

Appendix 3 – Consultation Responses from Internal and External Agencies

Stakeholder (LBH)	Comments	Response
<p>Design Officer</p>	<p><u>Location & Principle of Development</u></p> <ol style="list-style-type: none"> 1. The St Ann’s Hospital is a large, walled, historic hospital compound in the south-centre of the borough, approximately mid-way between Green Lanes to the west and Seven Sisters to the east. Its long northern boundary is the southern side of St Ann’s Road, a major east-west street connecting Green Lanes with South Tottenham, and its long southern boundary is the embankment of the Gospel Oak to Barking railway line, used for London Overground and goods services, whilst it’s shorter eastern and western boundaries are to residential streets and the backs of terraced houses. In recent years the health service has, in consultation with the council and other stakeholders, been redeveloping parts of the hospital, gradually moving health facilities into just the eastern half of the site. 2. The Health Authority commissioned a masterplan from Broadway Malyan 2012-2015, for the residential development of the western half of the existing hospital site, developed in consultation with council officers and granted planning permission in March 2015 (HGY/2014/1691, now expired). This was used to market the site to potential developers, whilst at the same time a community group developed a rival proposal for the site. This lead the GLA to broker a deal involving both of these applicants. At the same time and since, the Health Authority have been developing projects and carrying out their construction for the consolidation of the health care services on the retained hospital site, including a design award winning new Blossom Court mental health inpatient wards and more recent Imaging Centre and a number of smaller projects to adapt and update existing buildings and remove any facilities or plant relied on in what is now to be the residential development site. Council officers, including this Design Officer, have been fully involved in pre-app and other discussions on all the above schemes. 	<p>Comments have been taken into account. Materials to be controlled by condition.</p>

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	<p>3. The site is allocated in the council’s Local Plan, Site Allocations DPD (adopted July 2017) as SA28: St Ann’s Hospital Site, for “Enabling residential development to rationalise and improve the existing hospital site”. Site requirements are for the existing boundary wall to be integrated into the development, areas of SINC in the south of the site should be enhanced, the site developed as residential in order to enable a rationalisation and enhancement of the health facilities, a new connection towards Green Lanes provided at the south west corner, integrated into the cycle and pedestrian network, provision for a north-south route through the site, preserve and enhance the character of the conservation area, its significance, and its setting as per the statutory requirements, and provide new open space on the site which complements the nearby Chestnuts Park. Development guidelines include heights reduced to respect the amenity of neighbouring Warwick Gardens, and potential for being part of a decentralised energy network. Officers consider this proposal, like all those previous proposals mentioned above, to be wholly in accordance with the Site Allocation.</p> <p><u>Masterplan</u></p> <p>4. The application is a hybrid, with full planning permission applied for over part of the site, outline permission over the rest. The two follow a single coordinated Masterplan, and the outline portion includes a Design Code, which will for part of the approved documents if approved, and should help align and coordinate the outline sections of the site with the detailed design, form, and layout of the detailed portion of the site.</p> <p>5. The Masterplan is a coherent proposal that should successfully integrate the proposed development into its contrasting surroundings and improve connectivity. It demonstrates that the heights and built forms proposed would build up gradually from the prevailing two storey residential terraces to its west, interspersed as they are with three to five storey flatted blocks, and to the similar height but more campus-like retained hospital estate to the east. A phasing programme is included in the masterplan, indicating the works proceeding in an anticlockwise direction, from the</p>	

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	<p>detailed phase to the south-western corner, then to the south-east, finishing at the north-eastern corner. This is appropriate as it will limit disruption to existing residents and roughly time the later phases alongside later phases of the continuing hospital's works.</p> <p>6. The applicants have also demonstrated these proposals would be compatible with possible developments on the Arena Industrial Estate and its neighbours. The Arena Industrial Estate is another site allocated in the Site Allocations DPD and is located on the south side of the railway along the southern boundary of the site. The applicants have provided a simple but realistic example of how this site could be developed compatibly with St Ann's and have further demonstrated there would be no impact from the height of the proposals for this application on the development potential of Arena or vice versa.</p> <p>7. The most important aspect of the Masterplan is the extent to which it links the development into its surroundings. The pre-existing hospital site was characterised by being enclosed by a high wall, with limited access pints off St Ann's Road, its northern side, only. From the start, a key objective of both sites has been to make this walled boundary more permeable, whilst maintaining its integrity as a heritage asset making a significant contribution to the St Ann's Conservation Area.</p> <p>8. But the most crucial new connection at the south-west corner of the site, which will link the new neighbourhood on the former hospital with the corner of Stanhope and Warwick Gardens, is secured in the Masterplan, with the route of the link itself a detailed rather than outline component. This link is essential for not only promising to integrate the new residential community with the established residential community of "The Gardens", but providing a short, direct walkable and cyclable route from the proposed development to the shops, amenities, and public transport connections at Green Lanes. The connection is essential in also ensuring the whole new development will not act as a big cul-de-sac; the presence of clear, direct, through</p>	

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	<p>pedestrian routes, creating what is known as a good Space Syntax, being a proven factor in encouraging legibility, public safety of the public realm.</p> <p>9. The masterplan also safeguards connections from the development into the retained hospital site, which should align with the health authorities stated current preference that the St Ann’s site remain routinely open to the public, and not gated, including early opening of the route through towards the north-east corner of this application site. A second potential link location is noted to be safeguarded in this application’s masterplan, between blocks K and N1, which they note <i>could</i> follow depending on compatible completions on both properties. However, this may not be the only possible location for such a link (between K and J3, between J3 and J2 &/or south of J2 could all be possible and potentially preferable), and it will be important to secure by conditions that a link from this development into the southern end of the retained hospital site is secured as early as possible, even if it is initially a “meanwhile” or different link, due to the hospital site being incomplete or their plans having changed.</p> <p>10. Finally on connections, the site allocation envisaged this development helping to facilitate an improved connection to the south, over or more likely under the railway. The potential of this is supported by up to three bridges under the railway being shown on a number of historic maps and was raised as part of the Examination in Public on the Site Allocation for this and the Arena sites in the currently adopted Local Plan. The applicants have produced costings for building a new link from scratch, to demonstrate the unreasonable cost, but have not, as yet, investigated the existing ground around where historic maps show the former bridges.</p> <p>11. The applicants have also suggested that The transport and walking accessibility benefits of the new connection would be very limited, but officers consider a north-south link would be very useful, improving connectivity and permeability across what is presently a significant barrier with the only crossings a long distance to the east (Hermitage Road) and west (Green Lanes), as well as potentially contributing to longer term ambitions to create a “North South Green Link” connecting Woodberry Down, the Haringey Warehouse District, St Ann’s, Chesnut Park, West Green,</p>	

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	<p>Downhills Park, Lordship Rec and Tower Gardens. A potential location for such a bridge is nevertheless safeguarded in the masterplan that forms part of this application, although should the desirable or possible location of the bridge need to be amended, there should be no impediment to amending the landscaping, circulation routes and block locations.</p> <p><u>Design Code</u></p> <p>12. The Design Code will be an Approved Document, giving it greater weight in considering future Reserved Matters applications than the Design & Access Statement. As such it is crucial to ensuring that future phases will be built out to at least as good quality as the initial phases for which detailed planning permission is sought. In general, officers consider the Design Code (DC) is a really high-quality document that promises to be extremely powerful and useful in supporting and protecting high quality design and a coherent design across the development, tying the later phases, only applied for in outline and covered here in the DC, to the earlier phases applied for here in detail.</p> <p>13. The document is structured with Site Wide Codes, Landscape Codes and Architectural Codes. The general principles within the Site Wide codes are excellent. Placing some of the more detailed Conservation Area principles within the Site Wide codes, especially crucial views, gives them a welcome prominence, but could have been disadvantageously separated from the Architectural Codes by the Landscape Codes could have allowed them to be forgotten, but the applicants have improved cross referencing throughout the Code. Codes are described as either must or should be carried out. Unlike many other Codes, may is never used, which should give greater certainty. It could be argued that all Codes should be must, to give absolute certainty that the code will be followed exactly and strictly, giving absolutely no chance for their watering down, but it is reasonable to allow this much of flexibility in implementing the outline portion, and officers consider the most crucial elements are definitive.</p>	

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	<p>14. The Design Code is particularly strong on landscaping, both hard and soft, with a long and detailed section on Landscape and Public Realm coding. It is somewhat surprising to cover this before the detailed codes for buildings, but this reflects and helps to implement the overall intention for the development to be led by the green and natural landscape, and to be designed around the importance placed on preserving key existing trees and areas of landscaping within the site.</p> <p>15. A number of concerns raised by officers have been successfully resolved by amendments to the code. Where plots within the code (& outline section) face detailed plots (within the detailed section), the word reflect was frequently used, which could be an ambiguous term, but this has been replaced throughout the document with the clearer phrase “closely respond to”. A section on Residential Entrances has been added, specifying communal entrances must be on primary streets or spaces and tenure blind, and should be recessed, with clear, coherent integrated signage, lighting, intercoms, and post-boxes. The accompanying plan also shows house and individual ground floor flat and maisonette entrances, demonstrating there will be a front door opening onto all the major streets and spaces. Detailed codes on Refuse and Cycle Stores include that long lengths of ancillary frontages should be avoided, and more detail has been required design of required defensible space to ground floor windows to flats and houses.</p> <p><u>The Detailed Portion of the Application</u></p> <p><u>Development Pattern & Street Layout</u></p> <p>16. The centrepiece of the proposed development is an expansion on the existing parkland space at the centre of the existing hospital, where the greatest number of significant existing buildings to be retained are, into an enlarged “Peace Garden”. This will be delivered as part of the detailed design, form the heart of the development, connect directly across St Ann’s Road to the existing public park of Chestnuts Park opposite to the north, via the existing main hospital entrance, which be pedestrianised, and new pedestrian entrances. A broad, clear, primary Diagonal</p>	

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	<p>Path across the centre of the Peace Garden follows the main desire line of pedestrian routes across the site, receiving particular praise from the QRP for aiding clarity and legibility. This Peace Garden promises to be an exemplary, high quality, fully publicly accessible new park, providing amenity and recreation space for residents and neighbours, a setting for the more public-facing uses proposed for the landmark retained existing buildings and to demonstrate the centrality of nature conservation, retention of trees and provision of a biophilic neighbourhood in this proposal.</p> <p>17. As well as providing a pedestrian and biodiversity connection to Chesnut Park to the north, the masterplan introduces a north-south connection via a wider, tree-lined street, from the Peace Garden to the wooded embankment to the railway, designated a Site of Importance for Nature Conservation (SINC). The existing wooded fringe to the embankment will be expanded and have its biodiversity value increased through additional planting and better management, to provide a contrasting naturally wooded amenity space. These and further spaces around the site are also specifically opened up to allow particularly valuable trees to be preserved, whether because of their quality or the rarity of their species, and such spaces are designed to form an attractive and effective settings for such trees. A good example is the retained spotted thorn tree in the detailed part of the site. In this way the proposed development will compensate for the trees lost by creating better quality natural amenity spaces and better connections between them, allowing greater biodiversity.</p> <p>18. The masterplan and detailed design set up a coherent network of streets and squares around the central Peace Garden. The proposed primary street forms an effective ring around the development, distributing vehicular traffic and creating a legible framework for the development. It is at a consistent distance from the Peace Garden to allow a complete urban block of “mansion block” style flatted blocks enclosing a generous private courtyard between them and terraced “town houses” with generous private back gardens between the primary street and the east, north and west site boundary. A grid of secondary streets link the primary street and</p>	

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	<p>Peace Garden, and a series of smaller landscaped spaces punctuate some of the junctions between them, as well as providing an enhanced setting to retained buildings or particularly precious trees. On the south side, four evenly-spaced pavilion blocks mediate between the urban street grid and the natural landscaped wooded margin up to the railway (the SINC).</p> <p>19. The mansion blocks do not completely enclose their respective “city block”, as this could make the central private courtyard, and those flats that look onto it, dark, overshadowed, poorly ventilated and enclosed without a view out “into the world”. Instead, along the secondary streets and in some places onto spaces around special trees, gaps between mansion blocks are enclosed by railings containing gates. These will allow residents and potentially at times visitors to follow more informal routes through the landscaped courts, as well as allowing glimpsed views in and out and making maintenance and servicing more practical. The railings and gates sit within the well-developed language of landscaping features, incorporating reused interesting salvaged materials and features from the existing hospital, in one of the exemplary features of the proposed design.</p> <p><u>Form, Massing and Height</u></p> <p>20. The detailed proposals follow the masterplan, with height rising from three storey houses along the northern and western edge, with apartment blocks rising through five and six storeys along the eastern and southern sides of the primary street, facing the houses, to seven and nine storeys facing the Peace Gardens. The nine-storey block, Plot C, helps mark the Neighbourhood Square at the south-western corner of the Peace Garden, and has more of the character of a landmark block, marking the diagonal desire line route from the main entrance off St Ann’s Road to the south-western entrance off Stanhope & Warwick Gardens. Spaces between blocks generally, including this block, are commensurate with their heights, with more space around taller blocks, and the heights relate really well to the masterplan, context, and legibility of the site.</p>	

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	<p>21. All the mansion blocks, but particularly taller buildings, such as neighbouring Blocks C3 and D3 (7 & 9 storeys), which both face the park, are detailed appropriately to their height, with distinct base, middle and top, with the base and top covering two storeys in the taller block, which will give the mansion blocks a pleasing proportion and human scale. D3 is also designed to emphasise its slenderness and verticality, contrasting with the general horizontality of other more linear blocks, such as by opening up corner balconies and removing the topmost balconies' roofs. The QRP particularly noted the success of these design features in making the greater height of this block successful in appearance.</p> <p>22. The lower-rise terraces of townhouses to the development edges have a consistent three storey height. To the west, the townhouses will form a transition from the mansion blocks to the two and three storey terraced houses of the neighbouring Avenue Gardens area. To the north this will be compatible with the existing retained villa and gatehouse hospital buildings of one to three storeys, and the wall itself, along the northern boundary, where they will appear comparable to and compatible with the existing views of those existing buildings and into the hospital site from the north, with the taller mansion blocks rising gradually in steps through five and seven storeys. The QRP particularly noted this arrangement will allow the development to relate well to the retained wall and the conservation area.</p> <p>23. The generous number of retained buildings, more than in the original Broadway Malyan planning permission or as would be required by heritage designations, have convincing proposals for their adaptation and as the QRP notes, have the potential to significantly contribute to the character and distinctiveness of the development. Their settings are protected in public landscaped areas and relationships to new proposed housing carefully considered.</p> <p>24. Views of the development have been carefully considered from an early stage, with officers closely involved in agreeing appropriate viewpoints to assess the impact of the proposals on the surroundings, particularly on the St Ann's Conservation Area. Officers consider these views demonstrate the proposals will have a pleasing</p>	

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	<p>appearance in themselves and not have a detrimental impact on views of local landmarks or from sensitive local streets and spaces, including particularly views from within Chestnuts Park.</p> <p><u>Elevational Composition, Materials and Detailing</u></p> <p>25. The proposals' elevational composition includes gradation of mansion blocks into a clear and distinguished base, middle and top, and an orderly fenestration pattern of elegant windows and balconies, stacked to provide vertical or horizontal emphasis as is appropriate for their location and suited to their intended residential use. Communal entrances are well positioned on major streets or the park edge, clearly marked and generously proportioned. Additionally, ground floor flats on street frontage generally have their own front door, which generally animate flank or side returns of mansion blocks and sit within landscaped defensible space providing suitable privacy to ground floor residential windows, whilst they have corner recessed private external amenity spaces.</p> <p>26. Townhouses are composed with a more individual, domestic appearance. The long terraces to the western boundary are pleasingly repetitive, having a strong contemporary appearance and character somewhere between the Georgian terraces of Islington, that are plain and composed as a terrace, the nearby Edwardian terraces of The Gardens or The Ladder, busier, decorative and detailed more to express the individual house, and contemporary taste for more minimalist modern appearance suited to contemporary lifestyles. They have expressed entrance doors in short front gardens providing defensible space, housing refuse, cycle & ASHP stores.</p> <p>27. Flanks to the townhouses are simply detailed but animated with windows including, crucially, at ground level, to provide passive surveillance, and high brick walls to the sides of their long back gardens, which, along with a small 1st floor rear terrace, provide excellent private amenity and separation from existing neighbours. In the corresponding portion of the outline scheme to the eastern boundary of the development, to the retained hospital site, they have shorter, but sufficient, 7m back</p>	

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	<p>gardens, but this it to a different neighbour relationship, with proposed hospital car parking, with less of a privacy concern and more desire for passive surveillance from overlooking being available, although it will be important that they are provided with robust and attractive tall brick garden walls.</p> <p>28. Most sensitively, the houses to the north side, within the Conservation Area, against the high quality boundary wall and amongst the retained villas and gatehouses of the hospital buildings, respond more elaborately to elements of the historic context, with a gabled house form that allows them to turn the corner at the more significant ends of their shorter terraces, where entrances to the development off St Ann’s Road, through new openings in the hospital wall, are animated with an end-of-terrace “special” with its front door and many windows facing the entrance street. Gables, projecting bays and semi-dormer windows pick up on details found in the retained hospital buildings and reinterpret them with a contemporary twist, whilst still incorporating sound and appropriate materials and building details.</p> <p>29. Materials generally are dominated by a brick palette, with the range of brick colours and textures defined in the masterplan and design code, further detailed in the detailed portion for each individual building. This should provide variety with a coherence across the development, whilst reinforcing subtly different neighbourhood character to different parts of the development, but it will be important that high quality materials are confirmed by condition and that chosen materials are stuck to, or at least changed as little as possible, throughout the build-out of the phases of the development.</p> <p>30. The detailed portions detail buildings with darker bricks to define their bases, whether that’s one or two floors in the mansion blocks or taller buildings, or just the damp-proof course upstand to townhouses. In places, darker or lighter bricks are used to pick out special details, such as corners in the northern townhouses within the conservation area, or to spandrel panels below windows to the top floors of taller mansion blocks. Precast concrete (also known as artificial stone) is used in sparing particular places such as to balcony facias and soffits, banding between base, middle</p>	

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	<p>and top of mansion blocks, door surrounds to townhouses, and to mark new openings in the existing hospital boundary wall.</p> <p><u>Residential Quality</u></p> <p>31. Great care has been put by the applicants' architects into the design of the proposed new houses and flats, to ensure that they are spacious and suited to modern use patterns and the mix of sizes needed, whilst providing a frame and setting for exemplary quality streets, squares, parkland and gardens.</p> <p>32. 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, streets, and spaces are protected in implementation, preferably by retaining the current architects and landscape architects.</p> <p><u>Conclusions</u></p> <p>From a design point of view, these proposals are an exemplary masterplan, that should help to integrate this new residential neighbourhood into the wider context of neighbouring residential neighbourhood, public park and continuing hospital, whether or not the much desired but understandably more difficult connection under the railway can be achieved. This is supported by a robust and superbly detailed design code for the outline portion, and high-quality designs for a variety of good homes and excellent public realm in the detailed portion. The QRP have given the proposals their fulsome support.</p> <p>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 and landscape 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</p>	

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	<p>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.</p>	
Conservation Officer	<p>This development proposal has been supported by extensive pre-application discussion that has encouraged a sound contextual analysis and heritage assessment as steppingstones to achieve a sound design response to the heritage within and around the development site. The proposed scheme has been discussed with officers throughout its evolution and has been accordingly developed in its heritage setting through an extensive, conservation-led design exploration that has led to the submitted design response to the Conservation Area and related heritage assets .</p> <p>The extent and complexity of this heritage-sensitive development site has required a transformative yet sensitive conservation-led design approach where the special character of the conservation area and of its heritage buildings will be retained and experienced as part of a contemporary, new urban context that will provide a good opportunity to optimise the fruition and enjoyment of the currently underused hospital site, will deliver new homes for a wide-range of users, will provide greater public space and permeability into the hospital site and will ultimately improve the quality of the area by creating a new, high quality neighbourhood that complements and positively responds to the surrounding area. The principle of redevelopment of the Hospital site is supported from the heritage conservation standpoint as an opportunity to enhance the setting of the Conservation Area, and an opportunity to deliver public benefits</p> <p>The proposed development is clearly and comprehensively illustrated, including its heritage sensitivities and related impacts throughout the submitted Heritage Statement, Townscape Analysis, TVIA and Design and Access Statement. Phase 1A as illustrated in the detailed application involves the southern stretch of the Conservation Area that</p>	<p>Comments have been taken into account.</p>

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	<p>comprises the locally listed heritage buildings that front St Ann’s Road, the boundary wall, and the Peace Garden, located at the very heart of the development site. The proposed scheme has been developed according to a sound heritage-led and even more significantly, landscape-led design approach. This approach is very coherent with the soft and leafy character of the conservation area in proximity of the development site. Built forms are designed to complement and accentuate the site’s heritage, forming a focus of new routes and spaces, proposed massing and scale respond to and draw inspiration from the proportions and character of the surrounding townscape, the visual relationships between heritage assets, green spaces and Conservation Area are preserved with sensitive massing and landscaping, the historic fabric and appearance of the retained buildings are retained and complemented by green spaces and high-quality design and materials for new buildings, key views across and out of the Conservation Area are carefully assessed and impact from new development is mitigated by design.</p> <p>The first phase of development sees the retention of the heritage buildings located along St Ann’s road and around the centre piece Peace Garden so to respectively retain the architectural connection with the rest of the Conservation Area to the north and to allow to experience the surviving heritage buildings within the site as focal points for new streets and spaces, thus creating a gradual transition between the historic character of the site and its new, taller buildings forming part of the following development phases. It is proposed to salvage existing built materials and re-use these as part of the redesigned landscape to ensure history can be read at a variety of scales. This proposed retention, re-use and integration of historic buildings and fabric in the new landscape is a very positive step toward retention and unveiling of the historic character still surviving onsite. The pivotal landscaped space of the Peace Gardens provides with its soft openness a balancing feature between the northernmost, heritage part of the hospital located in conservation area and the emerging taller development proposed to the immediate south of the conservation area boundary.</p>	

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	<p>The scheme also includes a series of new openings through the northern brick boundary wall, whose linear geometry and enclosing nature are symbolically retained while creating pedestrian and cyclists' connections towards the conservation area and throughout the development site.</p> <p>The experience and fruition of the redeveloped hospital site is going to be finally enjoyed together with the quality of the historic environment of the conservation area and will encourage shared use of the neighbourhood's green spaces thus also enhancing the experience of the conservation area.</p> <p>The proposed scheme involves various development plots and various building typologies that respond to the character of the development site , bring definition to the spaces between the buildings, and help the legibility of streets and spaces, preserving character and supporting long-term communities.</p> <p>The proposed Plot A houses, designed as traditionally inspired brick terraces with distinctive gable ends fronting St Ann's Road, will be located to the west of Mayfield House and West gate lodge will frame a new vehicular and pedestrian entrance into the northwest end of the site, and have been convincingly designed to reflect the scale, massing, and layout of the conservation area. The proposed Plots C and D will be located further into the site, behind plot A and to the west of the retained Peace building and gardens, well beyond the conservation area boundary, and will gradually appear to the viewer with its taller and more contemporary apartment blocks in views out of the conservation area and into the development site. Both plots C and D form part of the evolving scenario of St Ann's hospital and their articulated plan form, facades and heights provide a reasonable response to the new layout, pedestrian and visual permeability of the development site revolving around the generous Peace Garden.</p> <p>From within the site in the northwest vehicular entrance will be defined by the new terraces thus reflecting the existing Site entrance at East Gate and West Gate Lodge. The proposed design of Plot A successfully responds to the character of the conservation area and features a context-led architectural language strongly rooted in the historic character of the site.</p>	

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	<p>The Plot B houses will run from the Water Tower to the ambulance station along the Western boundary and sit outside the St Ann's Conservation Area. Like the Plot A houses, they are offset from the boundary wall to create private back gardens and the overall scale and height is sensitively configured to respond to the scale of the existing built environment and to retain the existing Water Tower as a legible feature.</p> <p>The outline application is robustly supported by parameter plans and design codes and includes plot O, which is in conservation area, to the east of the retained East Gate Lodge and the proposal is for one row of 3 storey terraced houses facing the St. Ann's Road historic wall to the north and a new entrance to the east. Consistently with the design of Plot A the proposal outlines a gable elevation to the end terrace facing the Site entrance to provide an active frontage. Plot O also includes a 2 storey, pitched roof building to be erected to the east of the retained Mulberry House. The proposed building scale and roof shape is designed to maintain the visibility of St Ann's Church spire, identified as a landmark within the conservation area.</p> <p>The proposed transition from the scale and height of the conservation area to the new built environment of the development site is convincingly expressed through the proposed sequence, from St Ann's Road towards the south, of three storey terraces backed by taller apartment blocks that can be seen in the background of views across and out of the conservation area.</p> <p>The visual permeability promoted by the proposed scheme, with the tallest buildings located away from the conservation area boundary and a gradual stepping up in height, creates an interesting and varied roofscape and visually connects the conservation area, well legible in the foreground of views, to the new quarter, clearly legible in the background as a totally new urban environment.</p> <p>Both the Heritage Statement and the Built Heritage Assessment forming part of the Environmental Statement are very detailed and clear, these stem from the extensive pre-</p>	

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	<p>application discussion on heritage sensitivities and heritage impact and from pre-planning design workshops aimed at mitigating heritage impact through sensitive, context-led design solutions. The assessment of impact of proposed works and resulting development on the special interest of the identified heritage assets and on their views appears correct and it is not considered that the proposed development will have significant effects on the heritage assets.</p> <p>However, the progressively greater scale and height of the new development will have a minor adverse impact on the setting of the conservation area and this will lead to a low level of less than substantial harm to the significance of the conservation area. This is due to the loss of the established and enclosed, leafy and little developed character of the southern section of the Conservation area along and behind the boundary wall, this character will change with the new development which will provide an unprecedented, interesting yet distractingly taller and denser built background to the retained heritage buildings in southwards views across and out of the conservation area. But it is also important to consider that the proposed scheme seems to successfully deliver several enhancements to St Ann's Conservation Area by removing low quality 20th century development, by retaining positive historic buildings, materials and green spaces and making heritage buildings focal points within the new development. It is also a scheme that enhances the landscape quality and preserves both the special interest and key views of listed buildings and enhances the non-designated asset on site.</p> <p>The submitted application and related assessments show that the proposed development has been thoroughly and sensitively designed to address its heritage setting, to mitigate the impact caused by the increased scale, density, and height on the doorstep of the conservation area and its distinctive scale and townscape. The new development will deliver a new residential quarter of high-quality buildings and public spaces with massing, scale, design complementary to and respectful of their heritage setting and the proposed scheme is fully supported from the conservation standpoint.</p>	

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<p>Housing Officer</p>	<p>Affordable Housing Provision, dwelling and tenure mix</p> <p>The hybrid application outlines that new homes will be built in all phases – 1A, 1B, 2 and 3.</p> <p>The detailed planning permission in HGY/2022/1833 is for phase 1A only.</p> <p>Phase 1A Phase 1A will see 239 units provided in plots A-D consisting of:</p> <ul style="list-style-type: none"> • 38 London Affordable Rent (LAR) - Older Adult homes • 22 London Living Rent (LLR) homes • 34 Shared Ownerships homes • 145 Private Sale homes <p>Units such as the Older Adults homes are much needed as outlined in the Strategic review of Supported Housing (2017) and cited within Haringey’s guidance <i>Appendix C – Affordable and Specialist/Supported Housing Guidance</i>. This is welcomed.</p> <p>Additionally, the 22 LLR homes (intermediate) planned will be designated for keyworkers as defined and allocated by Barnet, Enfield and Haringey Mental Health Trust (BEHMHT). As noted in Haringey’s <i>Intermediate housing policy statement 2018</i>, whilst the Council does not prioritise key workers for intermediate housing, employer led housing developments are strongly encouraged in the borough and the Council welcomes initiatives from employers bringing forward land or other assets to develop housing for their employees. The rents should be set at a third of local incomes.</p> <p>The 34 Shared Ownership homes too are an intermediate product and make up part of the affordable housing provision. The application references <i>Haringey’s Intermediate</i></p>	<p>Comments have been taken into account. Affordable housing would be secured through planning obligation.</p>

Stakeholder (LBH)	Comments	Response
	<p data-bbox="465 272 1644 341"><i>housing policy statement 2018</i>, specifically the criteria for eligibility and parameters around marketing.</p> <p data-bbox="465 384 1709 453">The subsequent phases (1B, 2 and 3) will deliver many of the affordable homes and the breakdown for the whole site by tenure is as follows:</p> <ul data-bbox="611 496 1256 724" style="list-style-type: none"> • 275 London Affordable Rent • 38 London Affordable Rent – Older Adults • 93 London Living Rent • 117 Shared Ownerships • 56 Community Land Trust • 392 Private Sale homes <p data-bbox="465 767 1742 906">Overall, the site will see 154 units provided and then managed by Haringey council (inclusive of the 38 Older Adult homes), this low cost rented housing for general needs will be set at Council rents and this is compliant with Haringey’s Appendix C – Affordable and Specialist/Supported Housing Guidance.</p> <p data-bbox="465 949 1738 1129">The remainder will then be managed by Catalyst/Peabody and rented as London Affordable Rents. For low cost rented housing for general needs, the Council’s preference is for Social Rent, however it recognises that the general needs homes delivered by most Registered Providers on schemes funded by the Mayor of London are likely to be at London Affordable Rent. This is policy compliant.</p> <p data-bbox="465 1173 1720 1385">On the dwelling mix, the recommended dwelling mix for the affordable housing is 10% x1beds, 45% x 2beds, 45% x3 beds (10% x4beds or more). Whilst almost 30% of LAR units (excluding older adults LAR) are family sized units, it is noticeable that 1 bed’s account for circa 28% of the LAR units. Family-sized Social Rent/Affordable Rent homes for those in the most housing need are the most pressing priority for the council and as such we would welcome this being looked at some more.</p>	

Stakeholder (LBH)	Comments	Response
	<p>The development consists of 40% For Private Sale and 60% for Affordable Housing. This exceeds Haringey's minimum requirement of 40% of all new homes on new developments being affordable homes.</p> <p>No breakdown by habitable room was originally provided, however these have subsequently been received. The Affordable Housing (excluding CLT) provides general needs rent at 62% by habitable room, LLR at 15.6% by habitable room and then shared ownership at 22.4% by habitable room. This is compliant with Haringey's policy of a 60:40 split in favour of general needs accommodation for rent.</p> <p>Additionally, the 56 Community Land Trust homes which are classed as affordable and will likely be at LLR rents. The Affordable Housing Strategy - Community Land Trust document has now been received.</p> <p>97 units (10%) across the site will be wheelchair accessible and adaptable M4 (3) specification and the remaining 90% will be wheelchair adaptable M4 (2) specification. The wheelchair accessible and adaptable units are across all tenures on the site.</p> <p>The council's approach to Shared Ownership is set out in Haringey's Housing Strategy 2017-22 and Intermediate Housing Policy Statement 2018 and referred at the end of this document. Catalyst Housing's Shared Ownership Strategy has now been received. Whilst the cascade approach is to be maintained, it is proposed to change the income brackets within the bands over concerns around viability. Whilst this is noted, this does represent a diversion from Haringey's policy. This will require further consideration.</p> <p>Although we have now received the Shared Ownership Strategy, we would like to draw the applicants' attention to the following requirements relating to the pricing, allocation, letting, and marketing of the intermediate homes.</p>	

Stakeholder (LBH)	Comments	Response
	<p>Pricing</p> <p>The Council expects providers to ensure that all new affordable homes are genuinely affordable for Haringey residents.</p> <p>The Council expects that Shared Ownership housing is priced so that net housing costs, including mortgage costs, rents, and service charges, should not exceed 40% of a household's net income.</p> <p>As such, developers should be aware that Shared Ownership homes should be priced so that households with a maximum income of £40,000 for one- and two-bed properties, and £60,000 for larger properties will not spend more than 40% of their net income on mortgage costs, rents, and service charges.</p> <p>To be clear, that 40% threshold relates to pricing and not to allocation and letting.</p> <p>London Living Rent is required to be set at one third of average local household incomes.</p> <p>Allocation and letting of London Living Rent and Shared Ownership homes</p> <p>The Council's Intermediate Housing Policy requires that homes for Shared Ownership and London Living Rent (LLR) are targeted at households with a maximum income of £40,000 for one- and two-bed properties, and £60,000 for larger properties.</p> <p>Applicants for Shared Ownership must be first-time buyers unless they are purchasing to move into a larger home to meet their household needs.</p> <p>LLR homes must be limited to applicants with a gross household income of less than £60,000. However, they must be targeted at households with a maximum income of £40,000 for one- and two-bed properties.</p>	

Stakeholder (LBH)	Comments	Response
	<p>The Council is clear that local residents should benefit from new affordable housing and requires the use of priorities and marketing bands set out in the attached policy and summarised below. Developers are asked to note that robust mechanisms will be put in place to monitor and enforce these.</p> <p>Priorities are set to allocate properties when a number of individuals who meet the eligibility criteria have expressed an interest, and are as follows:</p> <p>Priority One:</p> <ul style="list-style-type: none"> • Haringey social housing tenants, including Housing Association tenants where Haringey has nominations rights to that property • Households on the housing register • Households who are required to move because of estate renewal, • Children of Haringey social housing tenants who are currently living with their parents <p>Priority Two</p> <ul style="list-style-type: none"> • Members of the armed forces • Applicants who live or work in the borough <p>Priority Three</p> <ul style="list-style-type: none"> • Any other applicants living or working in another London borough. <p>Where several applicants are in the same priority band, precedence will be given to households on the lowest income who meet the affordability criteria, and then to the applicant who first expressed an interest in the property.</p> <p>Marketing intermediate housing</p>	

Stakeholder (LBH)	Comments	Response
	<p>The Council sets clear guidelines for the marketing of intermediate products in order to ensure that these priorities are achieved.</p> <p>The attached Intermediate Housing Policy requires that intermediate housing is marketed in a phased way, with those living or working in Haringey with a maximum annual income of £40,000 for 1 and 2 bed properties and £60,000 for larger properties being prioritised until three months after completion.</p>	
Transportation Officer	<p><u>Trip Generation</u> The applicant has provided an assessment of future residential and non-residential trip generation, in support of the application.</p> <p>The residential trip generation indicates that nearly half of all journeys are anticipated to be made by active methods, with the highest share of journeys made on foot, while a further 36% are to be made by sustainable modes.</p> <p>Following pre-application discussion with LBH, a comparison between residential trip generation methodologies has been presented. The results show a higher proportion of active travel trips with the subsequently agreed methodology, with a lower number of vehicular trips, which supports the strategies within the proposed development. This strategy will be supported by a Travel Plan.</p> <p>Residential servicing trips are estimated at 301 across the whole day, with 18 in the AM peak. Trips during the busiest AM and PM hours, as requested by LBH, indicate up to 52 trips in the AM and 38 in the PM.</p> <p>For non-residential trip generation, as the site is to include no provision for on-site non-residential car parking, the vast majority of trips are to be made by active modes, with a total of 4394 trips across the day.</p>	<p>Comments have been taken into account. The recommended conditions and planning obligations will be secured, as appropriate.</p>

Stakeholder (LBH)	Comments	Response
	<p>Non-residential servicing trip generation is estimated at up to 63 trips by 32 vehicles.</p> <p>Total trip generation is estimated at a total of 6917 trips, with 3040 of those by foot, 353 by delivery or servicing vehicle and 569 by car.</p> <p>It is concluded that these are at acceptable levels for a development of this size.</p> <p><u>Road Junctions</u> As part of the Transport Assessment, the current performance of several junctions adjacent to the site have been assessed:</p> <ul style="list-style-type: none"> - St Ann's Road / La Rose Lane (Black Boy Lane) <ul style="list-style-type: none"> o Operating at acceptable levels, although some queues are higher than acceptable level of variation. - St Ann's Road / Hermitage Road <ul style="list-style-type: none"> o Hermitage Road approaching theoretical capacity, with higher queue rate during PM peak; other arms operating at acceptable levels. - St Ann's Road / Cornwall Road <ul style="list-style-type: none"> o Cornwall Road operating slightly above acceptable RFC during AM peak; other arms operating at acceptable levels. <p>Further to this, the future performance of these junctions has been assessed, to include the impact of the proposed development, in conjunction with the 2030 base estimates:</p> <ul style="list-style-type: none"> - St Ann's Road / La Rose Lane (Black Boy Lane) 	

Stakeholder (LBH)	Comments	Response
	<ul style="list-style-type: none"> ○ St Ann's (East) would operate at over the 0.85 RFC threshold; otherwise, little to no change between 2030 base and + development for either AM or PM peak. - St Ann's Road / Hermitage Road <ul style="list-style-type: none"> ○ St Ann's (West) would operate at 0.85 RFC, with no increase with the proposed development; queues would see a marginal increase, but not significant. - St Ann's Road / Cornwall Road <ul style="list-style-type: none"> ○ Cornwall Road would operate at 0.97 RFC under 2030 base estimates, with a minor increase with the proposed development. <p>However, there are instances where junctions (Hermitage Road and Cornwall Road) are currently operating with queues or nearing capacity. It is to be noted that since the submission of this planning application with the supporting information, there has been changes to the highways network with the introduction of the St Ann's Low Traffic Neighbourhood, which has removed all the north south movements via La Rose Lane (Black Boy Lane), Cornwall Road and The Avenue. Hence, the congestion noted above is unlikely to occur on La Rose Lane (Black Boy Lane) and Cornwall Road. Although it is very early in the trial of the proposed St Ann's LTN, early indication is that some traffic has been re-distributed to access the A503 via Hermitage Road, Vale Road and Eade Road. When considering the total vehicular traffic that will be generated by the development proposal, and the reduction in the number of access routes, it is likely that the forecasted vehicular distribution of traffic on Hermitage Road needs to be rebalanced. However, considering this area will be subjected to a future LTN proposal we will be seeking a contribution from the applicant to progress the design and consultation of this proposal to deal with any likely increase in vehicular traffic.</p>	

Stakeholder (LBH)	Comments	Response
	<p>It is considered that the potential traffic impacts from the proposed development on existing junctions would not be significant or at unacceptable levels to recommend refusal of the development proposal subject to conditions and S.106 mitigations covered later in this report.</p> <p><u>Trip Generation accident reduction Vision Zero</u> Paragraph 3.11.4 of the applicant submitted Transport Assessment shows that there are several collision hotspots on the local highways network including: Green Lanes/ Williamson Road to junction with Green Lanes St Ann's Road St Ann's Road junction with Hermitage Road Seven Sisters Road junction with Elizabeth Road/ Culvert Road Seven Sisters Road Junction with Elizabeth Road A10 Seven Sisters Road, We have considered that given the high number of pedestrian trips generated by the development proposal and the importance of walking as the main mode to access local transport interchanges we will require a contribution to the Council's accident reduction strategy for the sections of highways that is most critical to the development proposal, which is the Green Lanes corridor, and the St Ann's Road corridor as recommended by the Vision Zero Analysis submitted by the applicant. We will therefore be seeking a financial contribution towards this scheme which must be secured by the S.106 agreement.</p> <p><u>Public Transport Capacities</u> Assessment of impacts on existing public transport services from the proposed development have been presented by the applicant in support of the application.</p> <p>For the 2 x bus routes directly serving the site – routes 341 and 67 – it is calculated that there will be an increase of 17 x northbound trips / 8 x eastbound trips and 4 x northbound trips / 5 x southbound trips respectively during the AM peak, while it is calculated that there will be an increase of 13 x northbound trips / 6 x eastbound trips and 3 x northbound trips /</p>	

Stakeholder (LBH)	Comments	Response
	<p>4 x southbound trips respectively during the PM peak. It is concluded that the estimated additional trips would not result in significant impact on these services.</p> <p>For the Underground services serving the site – the Victoria line, from Seven Sisters station – it is calculated that line loading will increase by 148 x trips for southbound services / 5 x trips for northbound services in the AM peak. In both instances, capacity will remain at current occupancy levels of 72% and 12% respectively. It is calculated that line loading will increase by 4 x trips for southbound services / 113 x trips for northbound services in the PM peak. In both instances, capacity will remain at current occupancy levels of 59% and 15% respectively.</p> <p>Estimated additional trips have also been included for Piccadilly line services, from both Manor House and Turnpike Lane. It is calculated that line loading – from Manor House – will increase by 23 x trips for southbound services / 5 x trips for northbound services in the AM peak. In both instances, capacity will remain at current occupancy levels of 98% and 16% respectively. It is calculated that line loading – from Manor House – will not see any additional trips for southbound services / increase by 4 x trips for northbound services in the PM peak. In both instances, capacity will remain at current occupancy levels of 28% and 63% respectively.</p> <p>It is calculated that line loading – from Turnpike Lane – will not see any additional trips for southbound services / increase by 7 x trips for northbound services in the AM peak. In both instances, capacity will remain at current occupancy levels of 82% and 14% respectively. It is calculated that line loading – from Turnpike Lane – will not see any additional trips for southbound services / increase by 5 x trips for northbound services in the PM peak. In both instances, capacity will remain at current occupancy levels of 72% and 47% respectively. It is concluded that the additional trips would not result in significant impact on these services.</p> <p>For the Overground services serving the site – from Seven Sisters – it is calculated that line loading will increase by 24 x trips for southbound services / no additional trips for</p>	

Stakeholder (LBH)	Comments	Response
	<p>northbound services in the AM peak. While capacity will remain at the current occupancy level of 33% for northbound services, it will increase from 54% to 55% for southbound services. It is calculated that line loading will increase by 19 x trips for southbound services / not see any additional trips for northbound services in the PM peak. While capacity will remain at the current occupancy level of 33% for northbound services, it will increase from 37% to 38% for southbound services. It is concluded that the additional trips would not result in significant impact on these services.</p> <p>Estimated additional trips have also been calculated for Overground services serving the site – from Haringay Green Lanes, which will become more accessible following the creation of the link in the south-west corner of the site. It is calculated that line loading will increase by 4 x trips for westbound services / 12 trips x eastbound services in the AM peak. While capacity will remain at the current occupancy level of 34% for westbound services, it will increase from 13% to 14% for eastbound services. It is calculated that line loading will increase by 3 x trips for westbound services / 9 x trips for eastbound services in the PM peak. While capacity will remain at the current occupancy level of 10% for westbound services, it will increase from 12% to 13% for eastbound services. It is concluded that the additional trips would not result in significant impact on these services.</p> <p>For National Rail services serving the site – from Haringey station – it is calculated that line loading will not see any additional trips for southbound services / increase by 9 x trips for northbound services in the AM peak. While capacity will remain at the current occupancy level of 182% for southbound services – with no additional trips forecast from the proposed development – it will increase from 55% to 56% for northbound services. It is calculated that line loading will not see any additional trips for southbound services / increase by 7 x trips for northbound services in the PM peak. In both instances, capacity will remain at current occupancy levels of 76% and 112% respectively. It is concluded that the estimated additional trips are minimal and would not result in significant impact on these services, despite both AM peak southbound and PM peak northbound services currently running over capacity.</p>	

Stakeholder (LBH)	Comments	Response
	<p><u>Car Parking</u></p> <p>The main proposed details from the application are:</p> <ul style="list-style-type: none"> - 'Car-lite' development – residents will not be able to apply for permit within CPZ (current or future). - 167 x total car parking spaces. - 3% disabled parking provided up front. Additional 2% provision, based on future demand (not 7% additional, as per London Plan). - No provision for on-site non-residential parking. - EVCP included – 20% active of total provision, 80% of remaining provision. <p>The total of 167 x car parking spaces equates to a ratio of 0.17 spaces per dwelling. This is in accordance with London Plan Policy T6.1 (maximum residential parking standards). It was noted – by LBH – in pre-application discussion that this provision was considered low in serving the full range of future residents of the development considering 0.1 of the car parking spaces need to be allocated to wheelchair accessible units.</p> <p>Of the 167 x spaces, they are proposed to be apportioned equally between the affordable and private housing, with no proposal to sell the freehold to any space. Rather, the spaces will be allocated a permit /right to park across the site. Allocation of (affordable) parking is proposed to be prioritised according to dwelling size and work circumstances and on a first come, accessible spaces will be provided as priority. However, the allocation for the private housing is proposed to be on a first come first served basis, with no priority given to larger dwellings or Blue Badge holders. This proposal would go against, amongst other things, LBH DM Policy 32 and the requirement to provide parking for family sized units and Blue Badge holders. This was highlighted by LBH during pre-application discussion.</p> <p>Provision for accessible bays is proposed to be 3% of total parking spaces, with an additional 2% proposed based on future demand. This is lower than the London Plan</p>	

Stakeholder (LBH)	Comments	Response
	<p>recommended 7%. The London Plan states that “as a minimum as part of the Parking Design and Management Plan, how an additional seven per cent of dwellings could be provided with one designated disabled persons parking space per dwelling in future upon request as soon as existing provision is insufficient. This should be secured at the planning stage”. We will therefore require a condition to secure 10% car parking provision for wheelchair accessible units.</p> <p>The provision for car parking is proposed to be on-street within the development site, rather than located within any buildings. A minimum width of 2m is allowed for, with lengths of 6m (6.6m for accessible bays). Parking bays are delineated through the use of a different material to that of the internal road network and are all proposed to be constructed from permeable material. Accessible bays are planned to be located within 50m of their respective residential block.</p> <p>The applicant carried out a Parking Stress Survey in support of the application, looking at both residential and non-residential stress. The results of this indicated an average residential stress, within 200m of the site of, 70-71%, decreasing to 61-68% up to 500m of the site, with up to 146 x spaces available within 200m. The non-residential stress was recorded at a high of 17%, within 500m of the site. In any case, future residents will not be able to apply for permits to park within local CPZs (current or future) as part of arrangements discussed during pre-application and to be secured as part of the S.106 legal agreement.</p> <p>To further mitigate against car usage, the applicant has proposed the inclusion of 5 x car-club parking spaces (from the private allocation) within the site. This should be secured by S.106 legal agreement.</p> <p>The applicant has provided a Car Parking Management Plan in support of the application. This includes the above details, in addition to management measures and enforcement. If granted permission, a full Car Parking Management Plan will be required – secured by condition and monitored as part of the Travel Plan.</p>	

Stakeholder (LBH)	Comments	Response
	<p>The Car Parking Management Plan must ensure that car parking space for the private and housing association units are allocated in the following priority:</p> <ol style="list-style-type: none"> 1) Wheelchair accessible units or residents with a disability with the need for a car parking space 10% of all units in line with the London Plan. 2) Family size units 4/3 bed units 3) 2 bed four person units 4) 2 bed 3 person units 5) Any other units <p>Any changes to the above priority must be agreed in writing with the planning authority.</p> <p><u>Cycle Parking</u></p> <p>The main proposed details from the application are:</p> <ul style="list-style-type: none"> - Long and short-stay cycle parking to be provided, in accordance with London Plan (2021) minimum requirements and London Cycle Design Standards, for both the residential and non-residential elements of the development. - Pre-application discussion with TfL regarding aisle widths of 2.5m. - Further discussion concluded with an agreement of 1m between Sheffield stands. - The requisite quantum of cycle parking – as per London Plan minimum standards – to be contained within each respective block; individual homes will contain the required quantum of parking within the curtilage of each dwelling. <p>The applicant has proposed to provide 375 long-stay and 13 short-stay cycle parking spaces for the residential elements of Phase 1A, which are proposed to be split between their respective blocks.</p>	

Stakeholder (LBH)	Comments				Response
	Area	Schedule of accommodation	Cycle Parking – required	Cycle Parking – proposed	
	Block A – dwellings	3B5P – x 8	Long-Stay: <ul style="list-style-type: none"> - 2 x long-stay spaces per dwelling Short-Stay: <ul style="list-style-type: none"> - 2 x short-stay spaces 	2 x long-stay spaces per dwelling	
	Block B – dwellings	4B6P – x 18	Long-Stay: <ul style="list-style-type: none"> - 2 x long-stay spaces per dwelling Short-Stay: <ul style="list-style-type: none"> - 2 x short-stay spaces 	2 x long-stay spaces per dwelling	
	Block C – apartments	1B2P – x 62 >1B2P – x 44	Long-Stay: <ul style="list-style-type: none"> - 1.5 x long-stay spaces = 93 - 2 x long-stay spaces = 88 - Total = 181 Short-Stay: <ul style="list-style-type: none"> - 3 x short-stay spaces 	Long-Stay: <ul style="list-style-type: none"> - 182 x spaces Short-Stay: <ul style="list-style-type: none"> - 6 x spaces 	
	Block D – apartments	1B2P – x 42 >1B2P – x 65	Long-Stay:	Long-Stay: <ul style="list-style-type: none"> - 193 x spaces 	

Stakeholder (LBH)	Comments				Response
			<ul style="list-style-type: none"> - 1.5 x long-stay spaces = 63 - 2 x long-stay spaces = 130 - Total = 193 <p>Short-Stay:</p> <ul style="list-style-type: none"> - 3 x short stay-spaces 	<p>Short-Stay:</p> <ul style="list-style-type: none"> - 7 x spaces 	<p>The short-stay quantum has been calculated, per development block. However, it appears that it is proposed to be apportioned across the total quantum of residential units, located within close to the respective blocks within the public realm.</p> <p>Consequently, the proposed quantum of residential cycle parking is acceptable.</p> <p>However, it is not clear if questions from LBH during pre-application discussion – namely, around the provision of stands for the allocation of larger-cycle parking and if the ‘agreed’ aisle widths are acceptable or were agreed – have been addressed. For instance, the proposed two-tier cycle storage should have an aisle width of 2.5m beyond the lowered frame, not only from the upper rack itself. The apparent ‘agreement’ regarding this point is unclear. Therefore, provision of cycle parking should be secured by condition.</p> <p>The applicant has proposed to provide a quantum of long and short-stay cycle parking for the non-residential use classes, with the provision of short-stay cycle parking spread across the extent of the public realm, in close proximity to their respective building / location. However, the plans submitted do not indicate the exact nature of the storage infrastructure. This will need to be secured by condition, in accordance with London Plan Policy T5 and</p>

Stakeholder (LBH)	Comments	Response
	<p>London Cycle Design Standards and, where practicable, in accordance with prior agreed details with LBH for other cycle parking provision.</p> <p><u>Road Infrastructure</u> The main proposed details from the application are:</p> <ul style="list-style-type: none"> - The creation of 2 x new road accesses, from St. Ann's Road (B152). - The existing 1 x road access will be closed to road traffic. - The formation of new roads throughout the site, with the primary roads all to be two-lane, two-way routes, serving the 2 x new site accesses. - A number of secondary, one-way roads and links will provide access for parking, servicing and emergency vehicle access. <p>Vehicle swept paths have been provided, which indicate two-way traffic flow upon entry/exit to the site, including a refuse vehicle, demonstrating that there is sufficient width at the proposed entry / exit points. The proposed locations of the 2 x new road accesses would create priority 3-arm junctions with St Ann's Road.</p> <p>The two-way primary roads are proposed to be a minimum of 5.5m width, which is sufficient to provide two-way access for rigid vehicles, in addition to access for larger vehicles such as refuse vehicles and fire engines. All other one-way roads are proposed to be a minimum of 3.9m width, which is sufficient for access for one-way traffic, in addition to access for emergency services. The secondary roads provide useful connectivity throughout the site, with traffic flow limited to one-way only.</p> <p>Traffic modelling for the 2 x proposed new entrances indicates that there would be low RFC levels and virtually no queues expected in either the AM or PM peak.</p> <p>Road Safety Audits have not yet been carried out by the applicant. These will be required and secured by planning obligation. Subject to their acceptability, the creation of the 2 x</p>	

Stakeholder (LBH)	Comments	Response
	<p>new road accesses will require amendments to the existing highways network, with work to be secured by S278 agreement.</p> <p><u>Pedestrian and Cycle Infrastructure</u> The main proposed details from the application are:</p> <ul style="list-style-type: none"> - Utilising the 1 x existing access to the site as pedestrian only / non-vehicle. - The formation of pedestrian links throughout the site, including through the centrally located garden space (which is to be extended). - The creation of a new access in the south-west corner of the site, joining with Warwick Gardens / Stanhope Gardens. - The proposal to create new links with the adjacent St Ann's Hospital site. <p>The proposed south-west corner link is critical in providing an accessible link in that direction and improving the public transport accessibility for residents and users of the site (with agreement that it will allow the PTAL for part of the site to increase to 4). Works and amendments to the land outside of the site boundary will need to be secured by S.106 or other appropriate legal agreement.</p> <p>The applicant has referred to the creation of additional pedestrian / cycle links to the St Ann's Hospital site. It is considered that provision of these links is critical in providing accessible links to the east of the site. To ensure delivery of these proposed links, this should be secured by planning condition.</p> <p>All footways are proposed to be of a minimum width of 2m, which is acceptable. The site includes a number of crossing points and raised tables, delineated from other hard landscaped surfaces. Further, there are a number of segregated cycle routes across the site, including at the proposed south-west corner link.</p> <p><u>Future Highways Infrastructure Proposals</u></p>	

Stakeholder (LBH)	Comments	Response
	<p>There are a number of highways proposals and potential works close to the development site, some of which have been discussed with the applicant during pre-application discussions.</p> <p>The recently adopted Walking and Cycling Action Plan includes a proposal to create a protected cycle track along St Ann's Road, connecting Green Lanes (A105) and Seven Sisters (A503), which would serve the development site.</p> <p>In addition to the recently implemented St Ann's LTN, within close proximity to the development site is the Manor House LTN. We have considered that, with the changes to the highways network resulting from the introduction of the St Ann's LTN, that the traffic distribution for this link will be higher than that forecasted in the Transport Assessment supporting this application and will be seeking a contribution as part of the Manor House LTN consultation and design to restrict traffic on this link.</p> <p>The applicant has carried out an Active Travel Zone assessment, which has highlighted a number of potential improvements, including (but not limited to):</p> <ul style="list-style-type: none"> - Improvements to crossing facilities (at St Ann's Road / La Rose Lane). - Improvements to pedestrian footways (St Ann's Road, toward Grove Road and Chestnuts Park). - Improvements to street lighting and guard rails (St Ann's Road / La Rose Lane). <p>These proposals should be considered in light of the proposed development and its potential impact and requirements. Therefore, appropriate contributions toward studies and mitigation should be sought through planning obligations.</p> <p><u>Servicing</u> A Delivery and Servicing Plan has been submitted in support of the application. If granted permission, submission of a full Delivery and Servicing Plan will be required – secured by condition.</p>	

Stakeholder (LBH)	Comments	Response
	<p>Refuse collections will be made by both council (residential) and private (non-residential) contractors. For the residential elements, several bin stores are proposed throughout the site. All but 3 are to be located along primary routes, with those 3 in acceptable locations.</p> <p>5 x loading bays are included to support the non-residential elements of the proposed development, accommodating a range of larger vehicle sizes.</p> <p>Ambulance bays have been included within the parking plan, which is welcomed.</p> <p><u>Travel Plan</u> A Framework Residential Travel Plan has been submitted in support of the application. If granted permission, submission of a full Travel Plan will be required – secured by c S.106 legal agreement, including the requirement for monitoring for a period of no less than 5 years.</p> <p>An equivalent Travel Plan for the proposed Non-Residential / Commercial elements has not been submitted. However, considering the cumulative quantum of non-residential floor space of some 3,905sqm, we will require the applicant to submit a framework travel plan for the commercial aspect of the development proposal which is to be monitored for a period of not less than 5 years.</p> <p><u>Construction Logistics and Management Plan</u> Outline details of a Construction Logistics Plan have been provided in support of the application. The applicant has included an indicative programme of works, with the anticipated vehicle trips associated to each separate phase, along with routeing for construction vehicles. If granted permission, submission of a full CLP will be required – secured by condition and monitored byway of a S.106 obligation – with an updated and more accurate programme of works, including anticipated vehicle trips associated to each phase of work.</p>	

Stakeholder (LBH)	Comments	Response
	<p>On considering the above application, the Transportation Planning and Highways Authority would not object to this application subject to the following S.106 obligations and conditions:</p> <p>1. Car-Free Agreement The owner is required to enter into a Section 106 Agreement to ensure that the residential units are defined as “car free” and therefore no residents therein will be entitled to apply for a residents parking permit under the terms of the relevant Traffic Management Order (TMO) (current and future) controlling on-street parking in the vicinity of the development. The applicant must contribute a sum of £4000 (four thousand pounds) towards the amendment of the Traffic Management Order for this purpose.</p> <p>Reason: To ensure that the development proposal is car-free and any residual car parking demand generated by the development will not impact on existing residential amenity.</p> <p>2. Residential Travel Plan Within six (6) months of first occupation of the proposed new residential development a Travel Plan for the approved residential uses must be submitted to and approved by the Local Planning Authority detailing means of conveying information for new occupiers and techniques for advising residents of sustainable travel options. The Travel Plan shall then be implemented in accordance with a timetable of implementation, monitoring and review to be agreed in writing by the Local Planning Authority, we will require the following measures to be included as part of the travel plan in order to maximise the use of public transport:</p> <p>a) The developer must appoint a travel plan co-ordinator, working in collaboration with the Estate Management Team, to monitor the travel plan initiatives annually for a minimum period of 5 years.</p> <p>b) Provision of welcome induction packs containing public transport and cycling/walking information to every new resident.</p> <p>c) Provision of a car club with a minimum of 5 car club spaces and £50 in driving credit for each unit for a period of 2 years.</p>	

Stakeholder (LBH)	Comments	Response
	<p>d) The applicant is required to pay a sum of, £2,000 (two thousand pounds) per year per travel plan for 5 years to monitor the travel plan initiatives.</p> <p>Reason: To enable residential occupiers to consider sustainable transport options, as part of the measures to limit any net increase in travel movements by sustainable modes of transport.</p> <p>3. Commercial Travel Plans Within six (6) months of first occupation of the proposed new commercial element of the development a Travel Plan for the approved commercial uses must be submitted to and approved by the Local Planning Authority detailing means of conveying information for new occupiers and techniques for advising staff and visitors of sustainable travel options. The Travel Plan shall then be implemented in accordance with a timetable of implementation, monitoring and review to be agreed in writing by the Local Planning Authority, we will require the following measures to be included as part of the travel plan in order to maximise the use of sustainable modes of transport.</p> <p>a) The developer must appoint a travel plan co-ordinator, working in collaboration with the Estate Management Team, to monitor the travel plan initiatives annually for a minimum period of 5 years.</p> <p>b) Provision of welcome induction packs containing public transport and cycling/walking information to every new employee.</p> <p>c) The applicants are required to pay a sum of, £2,000 (two thousand pounds) per year per for a period of 5 years to monitoring the travel plan initiatives.</p> <p>Reason: To enable commercial occupiers to consider sustainable transport options, as part of the measures to limit any net increase in travel movements.</p> <p>4. Traffic Management Measures The applicant/ Developer will be required to contribute, by way of a Section 106 agreement, a sum of £80,000 (eighty thousand pounds) towards the feasibility, design and consultation</p>	

Stakeholder (LBH)	Comments	Response
	<p>relating to the implementation of traffic management measures in the area surrounding the site.</p> <p>Reason: To mitigate the impacts of the parking demand generated by the development proposal and to facilitate travel by sustainable modes to and from the site.</p> <p>5. Legible London Contribution To pay, by way of a Section 106 agreement, a sum of £110,000 (one hundred and ten thousand pounds) contribution towards Legible London Signage.</p> <p>Reason: To connect the St Ann's development to the closest rail stations (Seven Sisters and Harringay Green Lanes). TfL considers that at least 15 signs are needed to encourage travel by sustainable modes of transport to and from the proposed development.</p> <p>6. St Ann's Cycle Lane Feasibility Contribution The applicant will be required to contribute, by way of a Section 106 agreement, a sum of £150,000 (one hundred and fifty thousand pounds) towards feasibility and design of the proposed St Ann's protected cycle track.</p> <p>Reason: To facilitate travel by sustainable modes to and from the site.</p> <p>7. Manor House LTN Feasibility Contribution The applicant will be required to contribute, by way of a Section 106 agreement, a sum of £160,000 (one hundred and sixty thousand pounds) towards the feasibility, design and consultation relating to the implementation of the proposed Manor House LTN which is within close proximity of the site. Reason: To mitigate the impacts of the additional traffic generated by the development proposal.</p> <p>8. Section 278 (Highway Works) Agreement</p>	

Stakeholder (LBH)	Comments	Response
	<p>Before works commence on site to implement the development, the developer shall provide detailed designs and a Stage 1 and Stage 2 Road Safety audit for the works below to enable the developer to enter into the required S.278 agreement and must enter into an agreement with the Council as the Local Highway Authority under Section 278 of the Highways Act 1980 to undertake highway works comprising, but not limited to:</p> <ul style="list-style-type: none"> a) The creation of 2 x new vehicle accesses to the site from St Ann's Road. b) The reinstatement of the pedestrian footway outside the existing vehicle access. c) The creation of 2 x new pedestrian crossings on St Ann's Road (1 x signalised, 1 x Zebra). d) All associated lining and signing works. <p>Detailed designs and drawing showing the extent and nature of all proposed highway works shall be submitted to the Council so that an estimate of the cost of the works can be prepared by the council, the cost of the works to be paid in full by the applicant, all cost to be paid before the development is occupied.</p> <p>Reason: To ensure the highway works are undertaken to a high-level of standards and in accordance with the Council's requirements.</p> <p>9. Shadow S.278 agreement The creation of the new south-west pedestrian and cycle access to the site at the junction of Warwick Gardens and Stanhope Gardens, including all associated remediation works to the existing car park. Reason: To ensure the highway works are undertaken to a high-level of standards and in accordance with the Council's requirements.</p> <p>10. Accident reduction Vision Zero In order to address the accident clusters, which is likely to be made worse by the increase in walking trips generated by the development proposal we will be seeking a financial contribution of £120,000 (on hundred and twenty thousand pounds) to further investigate</p>	

Stakeholder (LBH)	Comments	Response
	<p>and implement measures to address accident clusters identified on St Ann's Road and the Green Lanes corridor.</p> <p>Reason: to mitigate any potential increase in collision resulting from the increase in pedestrian trips on the transportation and highways network and contribution towards achieving the Council's and TfL Vision Zero strategy</p> <p>11. Construction Logistics and Management Plan</p> <p>The applicant / developer is required to implement a Construction Logistics and Management Plan, prior to the commencement of development, and approved in writing by the local planning authority. The applicant will be required to contribute, by way of a Section 106 agreement, a sum of £10,000 (ten thousand pounds). The document shall include the following matters, but not limited to, and the development shall be undertaken in accordance with the details as approved:</p> <ul style="list-style-type: none"> a) Routing of excavation and construction vehicles, including a response to existing or known projected major building works at other sites in the vicinity and local works on the highways; b) The estimated number and type of vehicles per day/week; c) Estimates for the number and type of parking suspensions that will be required; and d) Details of measures to protect pedestrians and other highway users from construction activities on the highway. e) Limit movements during the critical school drop off and collection periods. <p>Reason: To provide the framework for understanding and managing construction vehicle activity into and out of a proposed development, encouraging modal shift and reducing overall vehicle numbers. To give the Council an overview of the expected logistics activity during the construction programme. To protect of the amenity of neighbour properties and to manage traffic safety.</p> <p>Conditions</p>	

Stakeholder (LBH)	Comments	Response
	<p>1. Cycle Parking The applicant will be required to provide long and short-stay cycle parking provision, for both residential and non-residential elements of the development, in line with the London Plan (2021) standards and the London Cycle Design Standards with the exception of double stackers where a minimum aisle width of 2.5 metres has been agreed a part of the pre-application process.</p> <p>Reason: To promote travel by sustainable modes of transport and to comply with the London Plan (2021) standards and the London Cycle Design Standards.</p> <p>2. Car Parking Management Plan The applicant will be required to provide a Car Parking Management Plan which must include details on the allocation and management of the on-site car parking spaces including all accessible car parking spaces (private and affordable housing) should be leased and allocated in the following order:</p> <ol style="list-style-type: none"> 1) Wheelchair accessible units or residents with a disability with the need for a car parking space which a minimum of 10% wheelchair accessible car parking provision in line with the London Plan. 2) Family size units 4/3 bed units 3) 2 bed four person units 4) 2 bed 3 person units 5) Any other units <p>Any changes to the above priority must be agreed in writing with the planning authority. Reason: To ensure that the allocation of the car parking spaces is in line with the London Plan and the Council's development management Policy 32 which seeks to prioritise parking to family sized units and disabled people.</p> <p>6. Delivery and Servicing Plan</p>	

Stakeholder (LBH)	Comments	Response
	<p>The applicant shall be required to submit a Delivery and Servicing Plan (DSP) for the local authority's approval. The DSP must be in place prior to occupation of the development. The delivery and servicing plan must also include a waste management plan which includes details of how refuse is to be collected from the site.</p> <p>Reason: To ensure that the development does not prejudice the free flow of traffic or public safety along the neighbouring highway.</p> <p>7. Connection between the hospital and residential sites. The developer will be required to submit a scheme, for approval which demonstrates that adequate pedestrian and cycle permeability is provided between both sites to encourage travel by sustainable modes of transport.</p> <p>Reason: to promote travel by sustainable modes of transport to and from the development proposals.</p>	
Carbon Management Officer	<p>Carbon Management Response 20/09/2022</p> <p>In preparing this consultation response, we have reviewed:</p> <ul style="list-style-type: none"> • Pre-Demolition and Pre-Refurbishment Audit prepared by Reusefully (dated 29 April 2022) • Energy Statement prepared by XCO2 (dated May 2022) • Circular Economy Statement prepared by XCO2 (dated May 2022) • Sustainability Statement, prepared by Bioregional (dated May 2022) • Whole Life Carbon Assessment prepared by XCO2 (dated May 2022) • Relevant supporting documents. <p>1. Energy – Overall</p>	<p>Comments have been taken into account. The recommended conditions and planning obligations will be secured, as appropriate.</p>

Stakeholder (LBH)	Comments	Response																																		
	<p>Policy SP4 of the Local Plan Strategic Policies, requires all new development to be zero carbon (i.e. a 100% improvement beyond Part L (2013)). The London Plan (2021) further confirms this in Policy SI2.</p> <p>The overall predicted reduction in CO₂ emissions for the development shows a site-wide improvement of approximately 73.3% in carbon emissions with SAP10 carbon factors, from the Baseline development model (which is Part L 2013 compliant). This represents an annual saving of approximately 812.5 tonnes of CO₂ from a baseline of 1,107.8 tCO₂/year. This is based on the development connecting to air source heat pumps only (and is reflected in the tables below). The proposal does not include a carbon reduction scenario based on connecting to the Decentralised Energy Network.</p> <table border="1" data-bbox="468 715 1668 1246"> <thead> <tr> <th colspan="4" data-bbox="468 715 1668 751"><i>Residential (SAP10 emission factors)</i></th> </tr> <tr> <th data-bbox="468 751 770 903"></th> <th data-bbox="770 751 1068 903">Total regulated emissions (Tonnes CO₂ / year)</th> <th data-bbox="1068 751 1368 903">CO₂ savings (Tonnes CO₂ / year)</th> <th data-bbox="1368 751 1668 903">Percentage savings (%)</th> </tr> </thead> <tbody> <tr> <td data-bbox="468 903 770 978">Part L 2013 baseline</td> <td data-bbox="770 903 1068 978">950.7</td> <td data-bbox="1068 903 1368 978"></td> <td data-bbox="1368 903 1668 978"></td> </tr> <tr> <td data-bbox="468 978 770 1015">Be Lean</td> <td data-bbox="770 978 1068 1015">702.2</td> <td data-bbox="1068 978 1368 1015">248.5</td> <td data-bbox="1368 978 1668 1015">26.1%</td> </tr> <tr> <td data-bbox="468 1015 770 1051">Be Clean</td> <td data-bbox="770 1015 1068 1051">702.2</td> <td data-bbox="1068 1015 1368 1051">0</td> <td data-bbox="1368 1015 1668 1051">0%</td> </tr> <tr> <td data-bbox="468 1051 770 1088">Be Green</td> <td data-bbox="770 1051 1068 1088">227</td> <td data-bbox="1068 1051 1368 1088">475.2</td> <td data-bbox="1368 1051 1668 1088">50%</td> </tr> <tr> <td data-bbox="468 1088 770 1169">Cumulative savings</td> <td data-bbox="770 1088 1068 1169"></td> <td data-bbox="1068 1088 1368 1169">723.7</td> <td data-bbox="1368 1088 1668 1169">76.1%</td> </tr> <tr> <td data-bbox="468 1169 770 1246">Carbon shortfall to offset (tCO₂)</td> <td data-bbox="770 1169 1068 1246">227</td> <td data-bbox="1068 1169 1368 1246"></td> <td data-bbox="1368 1169 1668 1246"></td> </tr> </tbody> </table> <table border="1" data-bbox="468 1283 1668 1394"> <thead> <tr> <th colspan="1" data-bbox="468 1283 1668 1319"><i>Non-residential refurbishments (SAP10 emission factors)</i></th> </tr> </thead> <tbody> <tr> <td data-bbox="468 1319 1668 1394">[Baseline set at the refurbishment notional baseline in line with Part L2B guidelines]</td> </tr> </tbody> </table>	<i>Residential (SAP10 emission factors)</i>					Total regulated emissions (Tonnes CO₂ / year)	CO₂ savings (Tonnes CO₂ / year)	Percentage savings (%)	Part L 2013 baseline	950.7			Be Lean	702.2	248.5	26.1%	Be Clean	702.2	0	0%	Be Green	227	475.2	50%	Cumulative savings		723.7	76.1%	Carbon shortfall to offset (tCO₂)	227			<i>Non-residential refurbishments (SAP10 emission factors)</i>	[Baseline set at the refurbishment notional baseline in line with Part L2B guidelines]	
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Stakeholder (LBH)	Comments				Response	
		Total regulated emissions (Tonnes CO₂ / year)	CO₂ savings (Tonnes CO₂ / year)	Percentage savings (%)		
	Part L 2013 baseline	157.1				
	Be Lean	95.2	61.9	39.4%		
	Be Clean	95.2	0	0%		
	Be Green	68.4	26.8	17%		
	Cumulative savings		88.7	56.5%		
	Carbon shortfall to offset (tCO₂)	68.4				
	Site-wide (SAP10 emission factors)					
		Total regulated emissions (Tonnes CO₂ / year)	CO₂ savings (Tonnes CO₂ / year)	Percentage savings (%)		
	Part L 2013 baseline	1,107.8				
	Be Lean	797.4	310.4	28%		
	Be Clean	797.4	0	0%		
	Be Green	295.3	502	45.3%		
	Cumulative savings		812.5	73.3%		
	Carbon shortfall to offset (tCO₂)	295.3				

Stakeholder (LBH)	Comments		Response
	Carbon offset contribution	£95 x 30 years x 295.3 tCO ₂ /year = £841,605	
	10% management fee	£84,160 (indicative)	
	<p>London Plan Policy SI2 requires major development proposals to calculate and minimise unregulated carbon emissions, not covered by Building Regulations. The calculated unregulated emissions are 597 tCO₂ (residential) and 73.8 tCO₂ (non-residential).</p> <p><u>Actions:</u></p> <ul style="list-style-type: none"> - The GLA guidance requires applicants to provide one strategy for the entire site with the design and expected CO₂ performance for the detailed and outline parts of the site presented separately. Please differentiate between the residential new build detailed and outline plots. - Please note that applicants should also consider the carbon emission targets that are likely to be in place at the time of submission of the reserved matters application to ensure that the scheme can meet any higher planning or regulatory targets. - These scenarios also need to be provided for the DEN connection scenario (site-wide, new build residential detailed, new build residential outline, refurbishment). <p>Energy – Lean</p> <p>The applicant has proposed a saving of 310.4 tCO₂ in carbon emissions (28%) through improved energy efficiency standards in key elements of the build, based on SAP10 carbon factors. This goes beyond the minimum 10% and 15% reduction respectively set in London Plan Policy SI2 for residential and non-residential uses, so this is supported.</p> <p>The following u-values, g-values and air tightness are proposed:</p>		

Stakeholder (LBH)	Comments			Response
		Residential new build	Commercial refurbishment	
	Floor u-value	0.10 W/m ² K	0.25 W/m ² K	
	External wall u-value	0.13 W/m ² K (0.30 W/m ² K to unheated spaces)	0.55 W/m ² K	
	Roof u-value	0.10 W/m ² K	0.12 W/m ² K (cold, pitched – 3%% improvement) 0.22 W/m ² K (warm, pitched)	
	Door u-value	1.00 W/m ² K	1.8 W/m ² K	
	Window u-value	0.80 W/m ² K	1.30 W/m ² K (28% improvement)	
	G-value	0.50	0.40	
	Air permeability rate	1-3 m ³ /hm ² @ 50Pa	10 m ³ /hm ² @ 50Pa	
	Ventilation strategy	Mechanical ventilation with heat recovery (MVHR)	MVHR (0.8 W/l/s Specific Fan Power)	
	Thermal bridging	Accredited Construction Details; y-value 0.10		
	Low energy lighting	LED or CFL lighting throughout. Occupancy sensors, daylight sensors.	LED or CFL lighting throughout. Occupancy sensors, daylight sensors.	
	Heating system (Baseline)	Gas boilers with gross efficiency of 89.5%	Gas boilers with gross efficiency of 84%	
	Cooling system	Not specified	Air source heat pumps (149.1 MJ/m ² area weighted average demand; 474,024	

Stakeholder (LBH)	Comments			Response
			MJ/year total cooling demand)	
	Space heating requirement	31 kWh/m ² /year average		
	Improvement from the target fabric energy efficiency (TFEE)	22.6% improvement		
	<p><u>Actions:</u></p> <p><i>New build</i></p> <ul style="list-style-type: none"> - Please identify on a plan where the MVHR units will be located within the dwellings. The units should be less than 2m away from external walls. What are the specific fan power and efficiency of the proposed MVHR units? - What is the proportion of glazed area? Consider how this performs against the LETI design guide indicating percentages of 10-20% (north), 10-15% (east + west), 20-25% south. - What is the expected thermal mass? - Walls to unheated spaces could be insulated further to reduce heat losses. - The air permeability between the main body and appendices are not consistent; this is reported at 1 and 3 m³/hm² @ 50Pa. - The overheating report and Be Lean sections confirm that no cooling is specified, however the Be Clean section states that there will be cooling demands for the new build residential flats. What justification is there for this cooling? <p><i>Refurbishments:</i></p> <ul style="list-style-type: none"> - The plans state that thermal performance details were to be provided in the Energy Statement. These have not all been provided. <ul style="list-style-type: none"> o The plans indicate that thermal dry wall lining is proposed in external walls, however no changes to the u-values have been reported in the Energy Strategy. If the baseline u-values are used, what works are being 			

Stakeholder (LBH)	Comments	Response
	<p>undertaken to improve the u-value? What type of insulation is proposed, will it be able to regulate moisture and humidity changes? What is the proposed thickness? Was any more thermally efficient insulation considered, and if so, why was it rejected?</p> <ul style="list-style-type: none"> ○ How are the existing windows proposed to be upgraded thermally? The ES indicates improvements but no detail; will the glazing be replaced, the frames, will double glazing be installed? ○ The plans indicate that existing doors will be replaced, but no improved u-values have been reported. ○ What are the different strategies for insulating the cold and warm roof spaces? What type and thickness insulation are proposed? ○ There is no mention of the fabric efficiencies of the new build elements within the retained buildings. ○ How did heritage considerations influence the proposals? <ul style="list-style-type: none"> - How will the air tightness be improved? What testing has been done to understand the baseline air tightness of the retained buildings? - How will thermal bridging between the old and new elements be reduced/mitigated? - What overheating mitigation will be implemented for the retained buildings; what shading will be incorporated? - Provide the energy demand summary for the non-residential uses, delivered energy requirement at point of use – MWh/year – by use. - What is the baseline/lean heating strategy? This should be a gas boiler, what is the gross efficiency figure of the boilers? <p>Overheating is dealt with in more detail below.</p> <p>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</p>	

Stakeholder (LBH)	Comments	Response
	<p>hierarchy of options (with connecting to a local existing or planned heat network at the top). Policy DM22 of the Development Management Document supports proposals that contribute to the provision and use of Decentralised Energy Network (DEN) infrastructure. It requires developments incorporating site-wide communal energy systems to examine opportunities to extend these systems beyond the site boundary to supply energy to neighbouring existing and planned future developments. It requires developments to prioritise connection to existing or planned future DENs. The development is within 500 meters of a planned future DEN, so the development is expected to secure connection subject to demonstration of technical feasibility and financial viability.</p> <p>The applicant has set out that:</p> <ul style="list-style-type: none"> - There is no existing network to connect to nearby. - The Woodberry Down network does not have capacity and will be run with ASHPs in the future, without relying on the connecting to a DEN. - The NHS buildings on the St Ann's site are heated through gas and would only connect to a site-wide/DEN if it was at a competitive price with gas. - Heat from tube ventilation shafts was considered too costly. - The planned connection to the Energy from Waste (EfW) plant at Edmonton, which is planned to power the borough-wide DEN in Haringey, is not considered to align with the programme of this proposal for Phase 1A. With the applicant's ESG policies, a temporary connection through gas boilers until the DEN becomes available to connect to, is considered contradictory. - They can agree to a commitment to connect to the DEN through the Section 106 agreement, with space provision to allow for connection where feasible, viable, and available in later phases (late heat exchangers, thermal storage and flow and return loop). - They will not be delivering a single centralised energy centre due to phasing and arguments around system diversity and reducing risk of fluctuations in cost to occupants. A single pipe to site boundary would be safeguarded. 	

Stakeholder (LBH)	Comments	Response
	<ul style="list-style-type: none"> - A communal Air Source Heat Pump system is proposed with solar PV (quantified under Be Green). 100% of heat would be delivered by ASHPs through three energy centres (ECs). The first EC would be in the detailed element on the roof of Block C3. <p>We would expect to see an energy strategy as follows:</p> <p><i>Short-term to 2027 = flexible for EITHER DEN or ASHP:</i></p> <ul style="list-style-type: none"> a. In the short-term, heat should be provided by gas boilers until either a connection is made to the area-wide DEN or baseload ASHPs are added (by end 2027). <p><i>In the medium term (Post 2027 or sooner if a decision is made not to progress the DEN) either:</i></p> <ul style="list-style-type: none"> a. A connection is made to the area-wide DEN and gas boilers could be retired; OR b. For ASHPs, gas boilers retained for peak periods with smaller baseload (c.20% of peak), ASHPs added to provide majority of heat at other times. <p><i>In the long-term, either:</i></p> <ul style="list-style-type: none"> a. The area-wide DEN is retained; or b. The peak gas boilers are replaced with peak ASHPs (i.e. the development needs to be designed to house ASHPs to meet 100% of the heat load). <p>The approach of using gas boilers:</p> <ul style="list-style-type: none"> a. In the short-term, acts as a bridge while a decision is made on the long-term heat source – it allows spend on the ASHP to be deferred as long as possible which supports the policy objective. b. In the medium term, it provides a similar carbon performance to using ASHPs at peak times but is considerably more economic than 100% ASHP in terms of capital costs and energy costs for future occupants. 	

Stakeholder (LBH)	Comments	Response
	<p>The applicant has objected to gas boilers in principle, but there is a policy basis for this in terms of prioritising the area-wide DEN and optimising running costs.</p> <p>In terms of the system design and ECs to meet the above, the phasing is unclear but there is scope for there to be multiple (probably no more than two) energy centres on a site-wide network.</p> <p>In terms of the London Plan and there being two Energy Centres:</p> <ul style="list-style-type: none"> • The key goal is a single, site-wide network and a single point of connection to the offsite DEN (EC2) – this can still be achieved. • The London plan has some flexibility for multiple ECs and phasing of ECs and temporary ECs. The arguments for this would be to address phasing/uncertainty in delivering the policy objective of a single network/connection point and so we would support multiple ECs. • In terms of the proposed three ECs and three networks, the phasing issues are unclear from the application, but their proposed solution seems to be mainly about managing their phasing risk – they do not seem to have tried to deliver the policy objectives of either: <ul style="list-style-type: none"> ○ a site wide network; ○ a single point of connection; ○ technology choice and spend profile to facilitate the area wide network. <p><u>Action:</u></p> <ul style="list-style-type: none"> - Address the energy strategy incorporating and responding the points above. - Consider how the heating and hot water of the retained buildings can be integrated within a policy compliant Be Clean solution with 1-2 ECs, rather than having individual ASHPs for each retained building. As a minimum, the larger retained buildings (Administration and Peace Buildings, with a floor area of over 500 m² each) should be connecting to the energy centre(s) on site as part of a site-wide network. 	

Stakeholder (LBH)	Comments	Response
	<p>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.</p> <p>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 and feasible options to deliver the heating strategy and Be Green requirements. A total of 502 tCO₂ (45.3%) reduction of emissions are proposed under Be Green measures.</p> <p>The solar array peak output would be 820.8 kWp, which is estimated to produce around 624,212 kWh/year of renewable electricity per year, equivalent to a reduction of 145.4 tCO₂/year. The array of 2,052x 400W panels would be mounted on a roof area of 3,946 m², facing south, assuming 20% system losses and 15% efficiency of panels.</p> <p><i>New build</i> A communal air-to-water ASHP system is proposed by phase, through three energy centres. This strategy would provide hot water and heating to the dwellings with a min. SCOP of 260%.</p> <p><i>Refurbishments</i> Individual ASHPs are proposed per building. This would provide hot water and heating to the spaces with a min. EER of 2.6 in cooling mode and COP of 2.6 in heating mode.</p> <p><u>Actions:</u></p> <ul style="list-style-type: none"> - The Water Tower plans only seem to indicate ASHP risers, where is its heating supply coming from? 	

Stakeholder (LBH)	Comments	Response
	<ul style="list-style-type: none"> - How would the space heating be delivered across the different space typologies? Would it meet 100% of the demand in the retained buildings? - What distribution loss factor has been used for the ASHPs? - How will the solar energy be used on site (before surplus is exported onto the grid)? <p>Energy – Be Seen</p> <p>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.</p> <p>The applicant should install metering equipment on site, with sub-metering by dwelling and non-residential unit. Display of energy usage and generation are proposed by unit. Public displays should also be provided in key areas to raise awareness of residents/businesses.</p> <p><u>Actions:</u></p> <ul style="list-style-type: none"> - Please provide information about the existing space heating demand of the retained buildings, based on energy bills. This will set a useful baseline to monitor energy use reductions as part of the Be Seen requirements. - What are the anticipated energy costs to occupants? This has been referred to, but no information has been provided. <p>2. Carbon Offset Contribution</p> <p>A carbon shortfall of 295.3 tCO₂/year remains in this ASHP scenario. The remaining carbon emissions will need to be offset at £95/tCO₂ over 30 years. This would amount to an offset of [£95 x 30 years x 295.3 tCO₂/year =] £841,605 plus a 10% management fee.</p>	

Stakeholder (LBH)	Comments	Response
	<p>An indicative offset contribution has been calculated above, however it is expected that changes are made to this proposal for this development to be policy compliant. Furthermore, a deferred carbon offset contribution mechanism will apply to this scheme as it is expected to connect to the DEN when this has been built.</p> <p>The applicant should present two carbon reduction table scenarios:</p> <ul style="list-style-type: none"> • Scenario 1: Connection to the DEN scenario (residual tCO₂ over 30 years) • Scenario 2: Alternative low-carbon communal heating scenario (residual tCO₂ over 30 years) <p>Two carbon offset payments will be calculated. The carbon offset contribution for scenario 1 will be due at the commencement of development and the difference in the offset contribution between the first and second scenarios will be deferred and indexed accordingly.</p> <ol style="list-style-type: none"> 1. Payment for the residual emissions in the DEN scenario (Scenario 1) would be due at commencement of development. 2. A deferred carbon offset contribution is calculated through the difference in the offset contribution: Scenario 2 – Scenario 1 = Deferred Payment. 3. If, after 2027 the development has <u>not</u> connected to the DEN, the deferred payment (+indexation) is due. 4. If, after 2027 the development has connected to the DEN, the deferred payment would not be due, but this amount would be available as a connection charge to the DEN. <p>3. 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</p>	

Stakeholder (LBH)	Comments					Response																														
	<p>systems. Through careful design, layout, orientation, materials and incorporation of green infrastructure, designs must reduce overheating in line with the Cooling Hierarchy.</p> <p><i>Detailed element</i></p> <p>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. The report has modelled 137 habitable rooms, 48 dwellings, two corridors, and 40 non-residential spaces under the London Weather Centre files within the detailed element of the proposals. Several iterations were modelled to test the necessary mitigation measures for the mandatory weather file – only the last iteration has been reported below (except for DSY1 2050s).</p>																																			
	<table border="1"> <thead> <tr> <th data-bbox="465 715 669 935"></th> <th data-bbox="669 715 904 935">TM59 – criterion A (<3% hours of overheating)</th> <th data-bbox="904 715 1117 935">TM59 – criterion B hours >26°C (pass <32 hours)</th> <th data-bbox="1117 715 1330 935">Number of habitable rooms pass TM59</th> <th data-bbox="1330 715 1516 935">Number of corridors pass TM59</th> <th data-bbox="1516 715 1702 935">Number of non-residential spaces pass TM52</th> </tr> </thead> <tbody> <tr> <td data-bbox="465 935 669 1011">DSY1 2020s</td> <td data-bbox="669 935 904 1011">137/137</td> <td data-bbox="904 935 1117 1011">89/89</td> <td data-bbox="1117 935 1330 1011">137/137</td> <td data-bbox="1330 935 1516 1011">2/2</td> <td data-bbox="1516 935 1702 1011">40/40</td> </tr> <tr> <td data-bbox="465 1011 669 1050">DSY2 2020s + DSY3 2020s</td> <td colspan="2" data-bbox="669 1011 1117 1050">(g-value 0.30; blinds)</td> <td data-bbox="1117 1011 1330 1050">0/137</td> <td data-bbox="1330 1011 1516 1050">(g-value 0.25; blinds; heavy thermal mass)</td> <td data-bbox="1516 1011 1702 1050">0/40</td> </tr> <tr> <td data-bbox="465 1050 669 1235">DSY2 2020s + DSY3 2020s</td> <td colspan="2" data-bbox="669 1050 1117 1235">(g-value 0.30; blinds)</td> <td data-bbox="1117 1050 1330 1235">5/137</td> <td data-bbox="1330 1050 1516 1235">(g-value 0.25; blinds; heavy thermal mass)</td> <td data-bbox="1516 1050 1702 1235">0/40</td> </tr> <tr> <td data-bbox="465 1235 669 1383">DSY1 2050s (blinds, shading,</td> <td data-bbox="669 1235 904 1383">27/137</td> <td data-bbox="904 1235 1117 1383">4/89</td> <td data-bbox="1117 1235 1330 1383">27/137</td> <td data-bbox="1330 1235 1516 1383">DSY1 2050s (blinds, shading,</td> <td data-bbox="1516 1235 1702 1383">33/40</td> </tr> </tbody> </table>						TM59 – criterion A (<3% hours of overheating)	TM59 – criterion B hours >26°C (pass <32 hours)	Number of habitable rooms pass TM59	Number of corridors pass TM59	Number of non-residential spaces pass TM52	DSY1 2020s	137/137	89/89	137/137	2/2	40/40	DSY2 2020s + DSY3 2020s	(g-value 0.30; blinds)		0/137	(g-value 0.25; blinds; heavy thermal mass)	0/40	DSY2 2020s + DSY3 2020s	(g-value 0.30; blinds)		5/137	(g-value 0.25; blinds; heavy thermal mass)	0/40	DSY1 2050s (blinds, shading,	27/137	4/89	27/137	DSY1 2050s (blinds, shading,	33/40	
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Stakeholder (LBH)	Comments						Response
	70% opening, 20l/s ventilation)				50% opening, 25-30l/s ventilation)		
	DSY1 2050s (with cooling)	137/137	89/89	137/137		40/40	
	DSY1 2080s (with cooling)	137/137	89/89	137/137		40/40	
	<p>Occupancy profiles for the non-residential areas are based on office, café, food preparation and community events area uses.</p> <p>All rooms pass the overheating requirements for 2020s DSY1. To pass this, the following measures will be built:</p> <ul style="list-style-type: none"> - Natural ventilation, with openable areas of 60% (residential) and 50% (non-residential) <ul style="list-style-type: none"> o Ground floor windows to typically open outwards and have fully retractable internal security louvres / shutters to provide secure natural ventilation particularly at night-time (with effective free areas of 45% if window is 90% open); o Living, kitchen, dining opening areas of 10% at night-time (security latch); - Glazing g-value of 0.50 (residential) and 0.4 (non-residential); - External shading through balconies; - MVHR with summer bypass; - Non-residential lighting density of 8 W/m²; - Thermal mass in exposed ceilings in non-residential spaces; - Equipment heat gains of 12.2 W/m in corridors; - Continuous extract of 20l/s in individual corridors operating at 24h per day; 						

Stakeholder (LBH)	Comments	Response
	<ul style="list-style-type: none"> - No active cooling. <p>Proposed future mitigation measures include (using passive solutions first):</p> <ul style="list-style-type: none"> - Solar control glazing (g-value 0.30); - Internal blinds; - Overhead shading of 0.5m; - Mechanical cooling with MVHR and cooling coil (delta T 15°C) or an active cooling system with active cooling more efficient and robust. <p><u>Overheating actions:</u></p> <ul style="list-style-type: none"> - Please include images indicating which sample dwellings were modelled and floorplans showing the modelled internal layout of spaces - The category of acceptable adaptive temperatures should be amended for the dwellings modelled in the block that will accommodate elderly residents. - The report does not accurately report on the fabric assumptions for the non-residential spaces; the roof u-values are much higher in the Energy Strategy. Please clarify / correct as required. - The Energy Strategy mentions perforated security shutters to the ground floor windows; however, these have not been shown or annotated onto the plans for the detailed phase of this proposal. Please correct. - The report does not follow the cooling hierarchy for mitigation measures; external shading has hardly been maximised to reduce solar gains in the current design. Please demonstrate what options were considered as part of the design process and why they were discounted, and please integrate external shading to the design as part of the design now to reduce overheating risk as far as possible for future weather files. The report notes that a redesign of the building would be required to integrate passive design solutions for more extreme weather files (which we have already seen recently), which means the current design should maximise all passive design solutions now. 	

Stakeholder (LBH)	Comments	Response
	<ul style="list-style-type: none"> - What pipework heat losses have been assumed for the pipes/HIUs within dwellings and within the corridors, and what is this information based on? Please clarify if the 'equipment' heat gains of 12.2 W/m in corridors are in fact the heating pipework losses. - For the required extract ventilation in corridors, please demonstrate that pipework heat gains have been minimised primarily, party walls with corridors have been insulated appropriately and air flow rates are balanced with necessary energy use. - Please confirm how the existing buildings can include exposed ceilings to allow for thermal buffering, and how they would be adapted practically to increase the thermal mass to 'heavy'? - What are the expected annual running costs, cooling demand (on an area-weighted average in MJ/m² and MJ/year, and kWh/m²/year) and cost to occupants for the active cooling system in the future. Please also confirm the efficiency of the equipment, whether the air is sourced from the coolest point / any renewable sources. - The development will need building user guides for future residents. - Confirm who will own the overheating risk when the building is occupied (not the residents). - Please set out the design guidelines for the outline plots to reduce overheating. Ensure that any noise pollution is mitigated appropriately along the railway. <p>4. Sustainability</p> <p>Policy DM21 of the Development Management Document requires developments to demonstrate sustainable design, layout and construction techniques.</p> <p><i>One Planet Living: Site-Wide Overarching Sustainability Principles</i></p> <p>The Sustainability Statement sets out the proposed measures to improve the sustainability of the scheme in line with the applicant's vision for the St Ann's new</p>	

Stakeholder (LBH)	Comments	Response
	<p>neighbourhood. The key principles are: people focused; place-led; new benchmark for housing; highly sustainable design; improved health and wellbeing; community growing and gardening; and child-friendly public realm. It covers all sustainability aspects including transport, equity and local economy, health and wellbeing, materials and waste, water consumption, flood risk and drainage, sustainable food, biodiversity, climate resilience, energy and CO2 emissions and landscape design. It is based on a local needs analysis.</p> <p>A number of notable aspects include:</p> <ul style="list-style-type: none"> - Strong emphasis on food growing - Large amounts of green spaces - Retention of buildings and re-use of building materials to create landscape features - Options to have on-site repair/library of things uses, and tree nursery - Multi-functional landscapes that provide amenity, play space and sustainable urban drainage features (swales, retention basin, tree pits, wet grassland and rain gardens), in addition to underground attenuation tanks. <p>Non-Domestic BREEAM Requirement Policy SP4 requires all new non-residential developments to achieve a BREEAM rating 'Very Good' (or equivalent), although developments should aim to achieve 'Excellent' where achievable.</p> <p>The applicant has also prepared a BREEAM Pre-Assessment Report for the commercial units. Based on this report, a score of 73.04% is expected to be achieved, equivalent to 'Excellent' rating. A potential score of 91.24% (Outstanding) could be achieved. This is supported.</p> <p>Living roofs All development sites must incorporate urban greening within their fundamental design, in line with London Plan Policy G5.</p>	

Stakeholder (LBH)	Comments	Response
	<p>The development is proposing living roofs in the development. All landscaping proposals and living roofs should stimulate a variety of planting species. Mat-based, sedum systems are discouraged as they retain less rainfall and deliver limited biodiversity advantages. The growing medium for extensive roofs must be 120-150mm deep, and at least 250mm deep for intensive roofs (these are often roof-level amenity spaces) to ensure most plant species can establish and thrive and can withstand periods of drought. Living walls should be rooted in the ground with sufficient substrate depth.</p> <p>Living roofs are supported in principle, subject to detailed design. However, the Design and Access Statements include sections that show substrate depths that are too shallow, and sedum-only roofs. Living roofs will need to comply with the standards as set out in the planning conditions.</p> <p>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. Amongst other benefits, these will increase biodiversity and reduce surface water runoff.</p> <ul style="list-style-type: none"> - The development achieves an Urban Greening Factor of 0.416, which complies with the interim minimum target of 0.4 for predominantly residential developments in London Plan Policy G5. - The development also achieves a biodiversity net gain, delivering 12.17% net additional habitat units on site. 	

Stakeholder (LBH)	Comments	Response												
	<p>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. The development should also seek to allocate publicly accessible 'cool spaces', following the <u>GLA's criteria for cool spaces</u> and to form part of the wider <u>cool spaces map</u>.</p> <p>Whole Life Carbon Policy SI2 requires developments referable to the Mayor of London to submit a Whole Life Carbon Assessment and demonstrate actions undertaken to reduce life-cycle emissions.</p> <p>The total calculated emissions based on the GIA (without grid decarbonisation) is estimated at:</p> <table border="1" data-bbox="468 858 1668 1342"> <thead> <tr> <th data-bbox="472 863 752 938"></th> <th data-bbox="752 863 1055 938">Residential new build</th> <th data-bbox="1055 863 1368 938">Commercial (refurbishment)</th> <th data-bbox="1368 863 1664 938">Whole site</th> </tr> </thead> <tbody> <tr> <td data-bbox="472 938 752 1273">Product & Construction Stages Modules A1-A5 (excl. sequestration)</td> <td data-bbox="752 938 1055 1273">812 kgCO₂e/m² Meets GLA benchmark (<850 kgCO₂e/m²). Band 'E' not meeting the LETI 2020 Design Target.</td> <td data-bbox="1055 938 1368 1273">26 kgCO₂e/m² Meets GLA's aspirational benchmark (<600 kgCO₂e/m²). Band 'A++' meeting the LETI 2030 Design Target.</td> <td data-bbox="1368 938 1664 1273">787 kgCO₂e/m² Meets GLA's benchmark (<850 kgCO₂e/m²). Band 'E' not meeting the LETI 2020 Design Target.</td> </tr> <tr> <td data-bbox="472 1273 752 1342">Use and End-Of-Life Stages</td> <td data-bbox="752 1273 1055 1342">279 kgCO₂e/m²</td> <td data-bbox="1055 1273 1368 1342">46 kgCO₂e/m²</td> <td data-bbox="1368 1273 1664 1342">272 kgCO₂e/m²</td> </tr> </tbody> </table>		Residential new build	Commercial (refurbishment)	Whole site	Product & Construction Stages Modules A1-A5 (excl. sequestration)	812 kgCO ₂ e/m ² Meets GLA benchmark (<850 kgCO ₂ e/m ²). Band 'E' not meeting the LETI 2020 Design Target.	26 kgCO ₂ e/m ² Meets GLA's aspirational benchmark (<600 kgCO ₂ e/m ²). Band 'A++' meeting the LETI 2030 Design Target.	787 kgCO ₂ e/m ² Meets GLA's benchmark (<850 kgCO ₂ e/m ²). Band 'E' not meeting the LETI 2020 Design Target.	Use and End-Of-Life Stages	279 kgCO ₂ e/m ²	46 kgCO ₂ e/m ²	272 kgCO ₂ e/m ²	
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Stakeholder (LBH)	Comments				Response
	Modules B-C (excl. B6 and B7)	Meets GLA's aspirational benchmark (<300 kgCO ₂ e/m ²). Modules A1-B5, C1-4 Band 'E' not meeting the RIBA 2030 Design Target.	Meets GLA's aspirational benchmark (<370 kgCO ₂ e/m ²). Modules A1-B5, C1-4 Band 'A++' meeting the RIBA 2030 Design Target.	Meets GLA's aspirational benchmark (<300 kgCO ₂ e/m ²). Modules A1-B5, C1-4 Band 'E' not meeting the RIBA 2030 Design Target.	
	Modules A-C (excl B6, B7 and incl. sequestration)	1,039 kgCO ₂ e/m ² Meets GLA target (<1200 kgCO ₂ e/m ²).	51 kgCO ₂ e/m ² Meets GLA's aspirational target (<970 kgCO ₂ e/m ²).	1,008 kgCO ₂ e/m ² Meets GLA target (<1200 kgCO ₂ e/m ²).	
	<p>The highest embodied carbon was found to come from Modules A1-A5 (70%), with the upper floors, substructure, and external works contributing the highest amounts respectively. Potential reduction measures included: cement replacement and aluminium hybrid windows.</p>				
	<p>Total estimated carbon emissions associated with the demolition of the existing buildings is 969,350 kgCO₂e GIA.</p>				
	<p>Circular Economy Policy S17 requires applications referable to the Mayor of London to submit a Circular Economy Statement demonstrating how it promotes a circular economy within the design and aim to be net zero waste. Haringey Policy SP6 requires developments to seek to minimise waste creation and increase recycling rates, address waste as a resource and requires major applications to submit Site Waste Management Plans.</p>				

Stakeholder (LBH)	Comments	Response
	<p>The principles used for this development are:</p> <ul style="list-style-type: none"> - Sourcing materials responsibly - Designing for durability and resilience (>60 years) - Implementing measures to optimise material use on site - Incorporating recommendations from the pre-demolition waste audit - Implementing waste minimisation targets during demolition and construction - Ensuring there is sufficient space for storage and segregation of operational waste - Designing flexible and adaptable buildings (commercial buildings' use changing between 5-25 years) <p>The report sets out the Key Commitments (Table 4-1), Bill of materials (Table 4-2) and Recycling and waste reporting form (Table 4-3). This is a fairly high level of information, and the applicant expects this to become more detailed as the detailed design progresses following permission.</p> <p>The Pre-Demolition and Pre-Refurbishment Audit summarises that the dominant materials on site by weight are 67% concrete, 23% brick, and 5% metals. It is estimated that 5% of materials are suitable for reuse. Where re-use is not feasible, recycling or local waste management options have been identified.</p> <p>The End-of-Life Strategy is based on repurpose and independent replacement of elements with shorter lifespans than the buildings. To extend the lifespan as long as possible, the strategy is to specify durable and standardised materials, designing for disassembly and reuse at the end of life, storing building information to facilitate disassembly, or refurbishment of buildings. Material passports will describe material characteristics, methods of disassembly and reuse, etc, but its use will depend on the implementation of BIM and the detailed design stage.</p> <p><u>Sustainability actions:</u></p>	

Stakeholder (LBH)	Comments	Response
	<ul style="list-style-type: none"> - Substrate depths of living roofs are not deep enough, the detailed design needs to include minimum 120mm substrates, with varying depths of 120-150mm. We cannot allow sedum-only roofs. - Has the applicant considered including blue roof features on some of the roofs, in addition to the living roofs and solar PV? - Could the SUDs/play space be available for kids during rainy weather? Year-round type playing / wet / water play? - The raingarden areas are not consistent between the SUDS plan and UGF plan, please rectify this. - UGF plan does not differentiate between intensive and extensive living roofs. - Please annotate the growing spaces on the landscaping plans. - Signage should be provided for edible planting across the site to help encourage residents and visitors to pick, educate about food growing, engage, and reduce food waste. - Will growing areas be supplemented by rainwater harvested water supplies, additional water supplies, tool sheds, seating, tables? - Could the neighbourhood square include seating (picknick tables, tables for games, etc) to encourage social interaction and events. - What is the development's climate change adaptation strategy? Identify in what ways the development will increase the resilience of residents and businesses and adapt their public realm/buildings to the impacts of climate change (increase in severity and frequency of weather events). Identify communal spaces (indoor and outdoor) where residents and people from the wider community can cool down if their homes are overheating, and what spaces will be suitable for people to enjoy outside the summertime (sheltered from the wind)? - The site is surrounded by a Low Traffic Neighbourhood and a School Street (to the east), and the level of car ownership in the area is currently low. The large amount of car parking proposed will not be attractive to use. Therefore, there is a high probability of spaces remaining vacant. This parking should be designed out, or ensure that there is a strategy to replace parking with better public realm uses. 	

Stakeholder (LBH)	Comments	Response
	<p>5. Conclusion</p> <p>Overall, it is considered that the application can be supported on the basis of its sustainability benefits, but it is not currently compliant with some carbon reduction policies and therefore cannot be fully supported. Further justification, clarifications and changes are required before we can support this application fully. Appropriate planning conditions will be recommended once this has been resolved.</p> <p>Planning Conditions (TBC)</p> <p>To be secured (with detailed wording TBC):</p> <ul style="list-style-type: none"> - Energy strategy (detailed; reserved matters) - DEN connection - Energy monitoring - Overheating (detailed residential, non-residential, reserved matters) - BREEAM certificates - Living roofs - Circular Economy (Pre-Construction report, Post-Completion report) - Whole-Life Carbon <p>Planning Obligations Heads of Terms (TBC)</p> <ul style="list-style-type: none"> - Be Seen commitment to uploading energy data - Energy Plan and Sustainability Review - Carbon offset contribution (and associated obligations for additional and deferred offset contributions), plus a 10% management fee (based on £2,850 per tonne of carbon emissions) - DEN connection (and associated obligations) - Heating strategy fall-back option if not connecting to the DEN 	

Stakeholder (LBH)	Comments	Response																												
	<p>Carbon Management Response 18/11/2022</p> <p>In preparing this consultation response, we have reviewed:</p> <ul style="list-style-type: none"> • St Ann’s Response to Carbon Comments, prepared by Lambert Smith Hampton (dated October 2022), including a table of responses dated 20th September 2022 • Energy Strategy Summary, prepared by Hill, Catalyst, XCO2 and LSH (dated October 2022) • Energy Strategy, prepared by XCO2 (dated 27 October 2022) • Further plans and information for the DEN strategy <p>Energy – Overall</p> <p>The tables below have been included as they are broken down by element of the proposals, as set out by the Energy Assessment Guidance.</p> <table border="1" data-bbox="465 943 1668 1399"> <thead> <tr> <th colspan="4" data-bbox="465 943 1668 979"><i>Detailed Application - Residential New Build (SAP10 emission factors)</i></th> </tr> <tr> <th data-bbox="465 979 770 1129"></th> <th data-bbox="770 979 1068 1129">Total regulated emissions (Tonnes CO₂ / year)</th> <th data-bbox="1068 979 1368 1129">CO₂ savings (Tonnes CO₂ / year)</th> <th data-bbox="1368 979 1668 1129">Percentage savings (%)</th> </tr> </thead> <tbody> <tr> <td data-bbox="465 1129 770 1206">Part L 2013 baseline</td> <td data-bbox="770 1129 1068 1206">228.2</td> <td data-bbox="1068 1129 1368 1206"></td> <td data-bbox="1368 1129 1668 1206"></td> </tr> <tr> <td data-bbox="465 1206 770 1246">Be Lean</td> <td data-bbox="770 1206 1068 1246">168.5</td> <td data-bbox="1068 1206 1368 1246">59.6</td> <td data-bbox="1368 1206 1668 1246">26.1%</td> </tr> <tr> <td data-bbox="465 1246 770 1286">Be Clean</td> <td data-bbox="770 1246 1068 1286">168.5</td> <td data-bbox="1068 1246 1368 1286">0</td> <td data-bbox="1368 1246 1668 1286">0%</td> </tr> <tr> <td data-bbox="465 1286 770 1326">Be Green</td> <td data-bbox="770 1286 1068 1326">54.4</td> <td data-bbox="1068 1286 1368 1326">114.1</td> <td data-bbox="1368 1286 1668 1326">50%</td> </tr> <tr> <td data-bbox="465 1326 770 1399">Cumulative savings</td> <td data-bbox="770 1326 1068 1399"></td> <td data-bbox="1068 1326 1368 1399">173.7</td> <td data-bbox="1368 1326 1668 1399">76.1%</td> </tr> </tbody> </table>	<i>Detailed Application - Residential New Build (SAP10 emission factors)</i>					Total regulated emissions (Tonnes CO₂ / year)	CO₂ savings (Tonnes CO₂ / year)	Percentage savings (%)	Part L 2013 baseline	228.2			Be Lean	168.5	59.6	26.1%	Be Clean	168.5	0	0%	Be Green	54.4	114.1	50%	Cumulative savings		173.7	76.1%	
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Stakeholder (LBH)	Comments				Response	
	Carbon shortfall to offset (tCO₂)	54.4				
	<i>Detailed Application - Non-residential refurbishments (SAP10 emission factors)</i> [Baseline set at the refurbishment notional baseline in line with Part L2B guidelines]					
		Total regulated emissions (Tonnes CO₂ / year)	CO₂ savings (Tonnes CO₂ / year)	Percentage savings (%)		
	Part L 2013 baseline	157.1				
	Be Lean	95.2	61.9	39.4%		
	Be Clean	95.2	0	0%		
	Be Green	68.4	26.8	17%		
	Cumulative savings		88.7	56.5%		
	Carbon shortfall to offset (tCO₂)	68.4				
	<i>Detailed Application – Site wide (SAP10 emission factors)</i>					
		Total regulated emissions (Tonnes CO₂ / year)	CO₂ savings (Tonnes CO₂ / year)	Percentage savings (%)		
	Part L 2013 baseline	385.3				
	Be Lean	263.7	121.6	31.6%		
	Be Clean	263.7	0	0%		

Stakeholder (LBH)	Comments				Response	
	Be Green	122.8	140.8	36.6%		
	Cumulative savings		262.4	68.1%		
	Carbon shortfall to offset (tCO₂)	122.8				
	<i>Outline application – Site wide (SAP10 emission factors)</i>					
		Total regulated emissions (Tonnes CO₂ / year)	CO₂ savings (Tonnes CO₂ / year)	Percentage savings (%)		
	Part L 2013 baseline	722.5				
	Be Lean	533.7	188.9	26.1%		
	Be Clean	533.7	0	0%		
	Be Green	172.5	361.2	50%		
	Cumulative savings		550	76.1%		
	Carbon shortfall to offset (tCO₂)	172.5				
	<p>Carbon offsetting The GLA sets out that the zero-carbon target applies to all residential and non-residential developments; for major refurbishments (a floorspace above 1,000 m²), the developments should meet the GLA’s carbon reduction targets and follow the energy hierarchy as well. In order to meet the GLA’s targets, an offset contribution will be required to offset the shortfall in emissions. The appropriate offset calculation will therefore need to be calculated.</p>					

Stakeholder (LBH)	Comments	Response								
	<table border="1" data-bbox="465 268 1671 683"> <thead> <tr> <th colspan="2" data-bbox="477 272 1659 309"><i>Carbon Offset Contribution Calculation</i></th> </tr> </thead> <tbody> <tr> <td data-bbox="477 309 770 421">Carbon offset contribution (Detailed only)</td> <td data-bbox="770 309 1659 421">£95 x 30 years x 122.8 tCO₂/year = £349,980 (indicative)</td> </tr> <tr> <td data-bbox="477 421 770 568">Carbon offset contribution (Detailed + Outline)</td> <td data-bbox="770 421 1659 568">£95 x 30 years x (122.8 + 172.5 tCO₂/year) = £841,605 (indicative)</td> </tr> <tr> <td data-bbox="477 568 770 678">10% management fee (Detail + Outline)</td> <td data-bbox="770 568 1659 678">£84,160 (indicative)</td> </tr> </tbody> </table> <p data-bbox="465 719 600 751">Be Lean</p> <p data-bbox="510 759 658 791">New build</p> <ul data-bbox="510 799 1644 1126" style="list-style-type: none"> - The MVHR positions are under review. - The glazing ratios have been provided. The southern ratio is justified in relation to the LETI guidance due to overheating potential. In the outline elements the applicant can reduce the glazing ratio further on east and west facades. - Medium thermal mass. - Air permeability range 1-3 m³/hm² @50Pa. - There will be no cooling for the residential spaces, as confirmed in the response but not in the updated ES. <p data-bbox="510 1129 748 1161">Refurbishments</p> <ul data-bbox="510 1169 1644 1378" style="list-style-type: none"> - Insulation type and technical properties and vapour control layer requirements, mitigation of thermal bridging, moisture and humidity will be developed at subsequent technical design stages. - Wall insulation will be a combination of blown cavity insulation (or similar) for cavity walls and internal wall insulation. U-values of 0.30 W/m²K have been modelled. 	<i>Carbon Offset Contribution Calculation</i>		Carbon offset contribution (Detailed only)	£95 x 30 years x 122.8 tCO ₂ /year = £349,980 (indicative)	Carbon offset contribution (Detailed + Outline)	£95 x 30 years x (122.8 + 172.5 tCO ₂ /year) = £841,605 (indicative)	10% management fee (Detail + Outline)	£84,160 (indicative)	
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Stakeholder (LBH)	Comments	Response
	<ul style="list-style-type: none"> - Windows and frames to be replaced with double glazing (1.3 W/m²K). - Doors to have u-values of 1.3 W/m²K, but 1.8 W/m²K has been modelled. Existing doors will be replaced. - Thickness of cold roof insulation will be developed at detailed design stage. - The new build elements to the retained buildings are envisaged to meet the same U-values and fabric performance of the new buildings on the project. - To condition the air tightness testing of the existing buildings, with plans to improve the air tightness. - Overheating mitigation for existing buildings: higher performance fabric, openable windows and solar control glazing. <ul style="list-style-type: none"> o <u>Action</u>: southern facades should incorporate external shading to reduce solar gains and the need for cooling, this shading should preferably be movable so it is used when it is necessary and daylight can be maximised at other times. <p>All</p> <ul style="list-style-type: none"> - Distribution losses – a figure of 1.05 has been used for the purposes of energy modelling, in line with SAP2012. The pipes will be designed in line with CP1 2020. Further scrutiny of the pipework heat losses and an efficient design will be undertaken as part of the planning condition stage. <p>Be Clean/Green</p> <p>The applicant has set out their revised approach to the heating strategy following a meeting between the council and applicant team on 28th September. This meeting focused primarily on the Be Clean strategy. The council followed up to clarify the position in line with the response above and following the meeting, via email on 28th September.</p> <p>The Energy Infrastructure Manager will provide separate comments on the site-wide energy strategy.</p>	

Stakeholder (LBH)	Comments	Response
	<p>The ES currently does not commit to connecting the two large, retained buildings (>1,000sqm) to the Phase 1a energy centre, despite showing this on plan submitted after the meeting took place. The GLA Energy Assessments Guidance states that all major refurbishments (of 1,000sqm or more) should follow the energy targets and energy hierarchy. This includes the requirement to follow the heating hierarchy to propose a low-carbon heating solution. The guidance further only excludes small commercial/retail units, described as having a small heating load often at the bottom of a tower block and under 500 sqm. The proposed large, retained buildings will have much higher heat loads than the units that are assumed under the exemption to connect to the DEN as they are freestanding with larger exposed areas, are over 1,000 sqm, and have old building fabric that will only be moderately improved. The applicant noted an estimated space heating demand of 125 kWh/m²/year during the meeting; this is considered high and a significant load that is worth connecting.</p> <p>This position is also supported by the GLA, so this requirement has been conditioned to ensure the development is acceptable on this point.</p> <p>Overheating</p> <ul style="list-style-type: none"> - The applicant has not provided any detail on which dwellings were modelled, and they only refer to a blurry image of the site without any annotations of buildings or which flats are modelled. <ul style="list-style-type: none"> o <u>Action</u>: Submit a clearer annotated plan and a list of the modelled dwellings, making it clear what building they are in and ensuring all habitable rooms have easy-to-identify numbers. Set out what number of dwellings are modelled per block. - The applicant seemed receptive to modelling the amended adaptive temperature for the block accommodating elderly residents. This is in line with the requirements set out in CIBSE TM59 under section 4.4. 	

Stakeholder (LBH)	Comments	Response
	<ul style="list-style-type: none"> ○ <u>Action</u>: Submit the revised modelling and results for Block B that will accommodate elderly residents. If these dwellings do not pass (all) files, please also include the necessary mitigation measures following the cooling hierarchy. - The applicant refers to an annotation of plans for detail on shutters. However, this is not sufficient. <ul style="list-style-type: none"> ○ <u>Action</u>: The detail of the security shutters has not been provided and should be provided prior to the determination. Such detail needs to be provided, even if it is indicative. - External shading, particularly where this is movable, will not significantly affect daylight levels. This is a suitable solution for some parts of the development. <ul style="list-style-type: none"> ○ <u>Action</u>: Will future redesign of the buildings be possible within the limitations of what will be built out? - Corridor heat gains of 12.2 W/m have been assumed with 42mm pipes. HIU heat losses of 131W were assumed for dwellings. An assumed 20L/s of continuous extract is required for the corridors; this will increase the energy demand and should be reduced. <ul style="list-style-type: none"> ○ <u>Action</u>: Pipe heat losses in corridors are expected to be about 6W/m. A more appropriate measure of expressing heat losses is W/m² to reflect the length of pipe per square meter of corridor. Please amend and consider reducing the heat losses within the detailed design. ○ <u>Action</u>: Reduce the pipework heat losses to reduce the energy demand of extract ventilation (capacity, running time, reduced heat losses, etc) - The applicant cannot foresee many opportunities to expose ceilings for additional thermal mass. <ul style="list-style-type: none"> ○ <u>Action</u>: The Energy Strategy and relevant overheating assessments need to be amended to reflect the limited opportunity for medium and 	

Stakeholder (LBH)	Comments	Response
	<p>heavy thermal mass in the existing buildings, as per the applicant's comments.</p> <ul style="list-style-type: none"> - Cooling demand modelled as 338.6MJ/m² (pg.118 of Energy Strategy) / 48.41kWh/m² (pg. 117 of Energy Strategy) with a cooling efficiency 2.6. - They will aim to position the vents in the coolest areas of the facades as far as feasible possible. <p>Sustainability</p> <ul style="list-style-type: none"> - SUDS areas can form wet play areas. - Signage can be incorporated into proposals. - RMAs will provide more detailed info on the growing areas. - Seating will be included in the neighbourhood square. - The climate change adaptation approach has been set out. <p>Outstanding items</p> <p>The applicant noted previously that the following was still under review/to be provided prior to the determination of the development. However, some aspects have not yet been provided:</p> <ul style="list-style-type: none"> • Carbon reduction figures for the detailed/outline elements; and the DEN scenarios • Strategy for using solar PV energy on site • Existing energy demand of retained buildings, which will inform detailed design and post-occupancy monitoring • Amendment of the adaptive temperature for the block that will accommodate elderly residents, and amended results. • Confirmation of who will own the overheating risk. • Consistency of SUDS plan and UGF plans. <p>These aspects need to be addressed, in addition to the actions listed above, before determination of this application.</p>	

Stakeholder (LBH)	Comments	Response
	<p>Planning Conditions</p> <p>To be secured:</p> <p><u>Energy Strategy - Detailed</u></p> <p>(a) Prior to the commencement of Phase 1a, a revised Energy Strategy shall be submitted to and approved by the Local Planning Authority. This shall be based on the approved Energy Strategy prepared by XCO2 (dated October 2022), delivering as a minimum a 76.1% (new build) and 56.6% (refurbishment) improvement on carbon emissions over 2013 Building Regulations Part L, with SAP10 emission factors, high fabric efficiencies, a low-carbon heating strategy, and a minimum 178 kWp solar photovoltaic (PV) array. The strategy will set out:</p> <ul style="list-style-type: none"> - Confirmation of how this phase will meet the zero-carbon policy requirement in line with the Energy Hierarchy; - Confirmation of achieving the highest possible fabric improvements, aiming for a minimum reduction of 26% reduction under Be Lean; - Specifications, location, pipework routes for the proposed heating and ventilation strategies; - Confirmation of the space heating demand of the retained and new buildings; - Air tightness testing results and strategy to improve air tightness in the existing buildings; - Strategy to reduce thermal bridging and insulation of existing buildings; - Confirmation that the two large retained buildings will be connected to the Phase 1a energy network; - Confirmation and details of how Phase 1a will form part of a site-wide network in future phases; - How the solar PVs have been maximised on Blocks A, C and D, and the retained buildings; 	

Stakeholder (LBH)	Comments	Response
	<ul style="list-style-type: none"> - The proposed heating, renewable energy and ventilation strategies (including their efficiency, output, location and pipework layout); - A metering strategy. <p>The final agreed energy strategy shall be installed and operation prior to the first occupation of the development. The development shall be carried out strictly in accordance with the details so approved and shall be operated and maintained as such thereafter.</p> <p>(b) Within six months of first occupation by block, evidence that the solar PV arrays have been installed correctly shall be submitted to and approved by the Local Planning Authority, including photographs of the solar array, installer confirmation, a six-month energy generation statement.</p> <p>Within six months of completion of each block, a final Energy Assessment must be submitted to the local planning authority to demonstrate achieved carbon emission savings on site. Evidence shall also be submitted to the Local Planning Authority that the development has been registered on the GLA's Be Seen energy monitoring platform.</p> <p>Reason: To ensure the development reduces its impact on climate change by reducing carbon emissions on site in compliance with the Energy Hierarchy, and in line with London Plan (2021) Policy SI2 and SI3, and Local Plan (2017) Policies SP4 and DM22.</p> <p><u>Energy Strategy – RMAs</u></p> <p>(a) Each application for the first reserved matters relating to Appearance, Layout or Scale submitted by phase/block shall be accompanied by an Energy Strategy. This phase block shall achieve the minimum requirements in line with the most up to date planning policy framework at the time of submission and shall achieve no less than a reduction in carbon emissions of 76% (residential) compared to a Building Regulations Part L 2013 compliant</p>	

Stakeholder (LBH)	Comments	Response
	<p>building with SAP10 carbon factors, or higher where revised policy requirements are in place at the time of submission.</p> <p>The strategy will set out:</p> <ul style="list-style-type: none"> - Confirmation of how this phase will meet the zero-carbon policy requirement in line with the Energy Hierarchy; - How the development aims to achieve minimum carbon reductions at the Be Lean Stage of 26% for the domestic new build; - Strategy to reduce thermal bridging; - Confirmation and details of how the proposed phase will form part of a site-wide network in future phases; - The proposed heating, renewable energy and ventilation strategies (including their efficiency, output, location and pipework layout); - A metering strategy. <p>The final agreed energy strategy shall be installed and operation prior to the first occupation of the development. The development shall be carried out strictly in accordance with the details so approved and shall be operated and maintained as such thereafter. The solar PV array shall be also installed with monitoring equipment prior to completion and shall be maintained at least annually thereafter.</p> <p>(b) Within six months of completion of each block, a final Energy Assessment must be submitted to the local planning authority to demonstrate achieved carbon emission savings on site. Evidence shall also be submitted to the Local Planning Authority that the development has been registered on the GLA's Be Seen energy monitoring platform.</p> <p>Within six months of first occupation by block, evidence that the solar PV arrays have been installed correctly shall be submitted to and approved by the Local Planning Authority, including photographs of the solar array, installer confirmation, a six-month energy generation statement.</p>	

Stakeholder (LBH)	Comments	Response
	<p>Reason: To ensure the development reduces its impact on climate change by reducing carbon emissions on site in compliance with the Energy Hierarchy, and in line with London Plan (2021) Policy SI2 and SI3, and Local Plan (2017) Policies SP4 and DM22.</p> <p><u>Future DEN Connection</u> Prior to the above ground commencement of construction work by phase or block, details relating to the future connection to the DEN must be submitted to and approved by the local planning authority. This shall include:</p> <ul style="list-style-type: none"> • Further detail of how the developer will ensure the performance of the DEN system will be safeguarded through later stages of design (e.g. value engineering proposals by installers), construction and commissioning including provision of key information on system performance required by CoP1 (e.g. joint weld and HIU commissioning certificates, CoP1 checklists, etc.); • Peak heat load calculations in accordance with CIBSE CP1 Heat Networks: Code of Practice for the UK (2020) taking account of diversification. • Detail of the pipe design, pipe sizes and lengths (taking account of flow and return temperatures and diversification), insulation and calculated heat loss from the pipes in Watts, demonstrating heat losses have been minimised together with analysis of stress/expansion; • A before and after floor plan showing how the plant room can accommodate a heat substation for future DEN connection. The heat substation shall be sized to meet the peak heat load of the site. The drawings should cover details of the phasing including any plant that needs to be removed or relocated and access routes for installation of the heat substation; • Details of the route for the primary pipework from the energy centre to a point of connection at the site boundary including evidence that the point of connection is accessible by the area wide DEN, detailed proposals for installation for the route that shall be coordinated with existing and services, and plans and sections showing the route for three 100mm diameter communications ducts; 	

Stakeholder (LBH)	Comments	Response
	<ul style="list-style-type: none"> • Details of the location for building entry including dimensions, isolation points, coordination with existing services and detail of flushing/seals; • Details of the location for the set down of a temporary plant to provide heat to the development in case of an interruption to the DEN supply including confirmation that the structural load bearing of the temporary boiler location is adequate for the temporary plant and identify the area/route available for a flue; • Details of a future pipework route from the temporary boiler location to the plant room. <p>Reason: To ensure the development reduces its impact on climate change by reducing carbon emissions on site in compliance with the Energy Hierarchy, and in line with London Plan (2021) Policy SI2 and SI3, and Local Plan (2017) Policies SP4 and DM22.</p> <p><u>Energy Monitoring Scheme</u> No development shall take place beyond the superstructure of the development until a detailed scheme for energy monitoring has been submitted to and approved in writing by the Local Planning Authority. The details shall include details of suitable automatic meter reading devices for the monitoring of energy use and renewable/ low carbon energy generation. The monitoring mechanisms approved in the monitoring strategy shall be made available for use prior to the first occupation of each building.</p> <p>Within six months of first occupation of any dwellings, evidence shall be submitted in writing to the Local Planning Authority that the development has been registered on the GLA's Be Seen energy monitoring platform.</p> <p>REASON: To ensure the development can comply with the Energy Hierarchy in line with London Plan 2021 Policy SI 2 and Local Plan Policy SP4 before construction works prohibit compliance.</p> <p><u>Overheating - Detailed</u></p>	

Stakeholder (LBH)	Comments	Response
	<p>Prior to the commencement of Phase 1a, a revised overheating model and report shall be submitted to and approved by the Local Planning Authority, based on acceptable principles as approved, taking into account any detailed design changes and responding the outstanding actions at application stage. The model will assess the overheating risk in line with CIBSE TM52 and TM59 (using the London Weather Centre TM49 weather DSY1-3 files for the 2020s, and DSY1 for the 2050s and 2080s) for the residential units and Community Hub and demonstrate how the overheating risks have been mitigated and removed through design solutions.</p> <p>This report will include:</p> <ul style="list-style-type: none"> - Revised modelling of the dwellings that will accommodate elderly residents in Block B with adaptive temperatures in line with the requirements set out in CIBSE TM59 under section 4.4. If these dwellings do not pass (all) files, please also include the necessary mitigation measures following the cooling hierarchy. - Reconfirmed details of the design measures incorporated within the scheme in line with the Cooling Hierarchy (including details of the feasibility of prioritising passive cooling and ventilation measures) to ensure adaptation to higher temperatures are addressed, the spaces do not overheat, and the use of active cooling is avoided; - Specification of mitigation measures; - Modelled pipework heat losses from the communal heating system that comply with CP1 2020, reducing the heat losses to reduce energy demand of extract ventilation in corridors; - A retrofit plan to mitigate the future risks of overheating by setting out how the future mitigation measures are shown to help pass future weather files and confirming that the retrofit measures can be integrated within the design (e.g., if there is space for pipework to allow the retrofitting of cooling and ventilation equipment) and include any replacement / repair cycles and the annual running costs for the occupiers; 	

Stakeholder (LBH)	Comments	Response
	<ul style="list-style-type: none"> - Submit a clearer annotated plan and a list of the modelled dwellings, making it clear what building they are in and ensuring all habitable rooms have easy-to-identify numbers. Set out what number of dwellings are modelled per block. - Specification and visual appearance of the proposed security shutters, and any further external shading measures proposed. <p>These mitigation measures shall be operational prior to the first occupation of the development hereby approved and retained (through a like-for-like in specification) thereafter for the lifetime of the development.</p> <p>Reason: In the interest of reducing the impacts of climate change, to enable the Local Planning Authority to assess overheating risk and to ensure that any necessary mitigation measures are implemented prior to construction, and maintained, in accordance with London Plan (2021) Policy S14 and Local Plan (2017) Policies SP4 and DM21.</p> <p><u>Overheating RMAs</u></p> <p>(a) Each application for the first reserved matters relating to Appearance, Layout or Scale submitted by phase/block shall be accompanied by a detailed Overheating Assessment. The Overheating Assessment shall be submitted for the written approval of the Local Planning Authority and shall be informed by Dynamic Thermal Modelling based on CIBSE TM59 for the residential spaces and TM52 for the non-residential spaces and TM49 weather files for London’s future weather/temperature projections. The assessment shall be undertaken in line with the following:</p> <ul style="list-style-type: none"> • The London Weather Centre dataset for all three DSYs; • Future weather patterns to projected impacts over the time periods DSY1 for 2050s and 2080s, all time periods should be modelled; • Mitigation for the 2020s period must be integrated into the design through passive design measures. The risks and the mitigation strategy for the periods of the 2050s and 2080s should be set out in a retrofit plan, confirming that measures can be fitted in the future and who will own the overheating risk; 	

Stakeholder (LBH)	Comments	Response
	<ul style="list-style-type: none"> • Specification and location of mitigation measures (especially where they are mitigating risk of crime, air or noise pollution); • Confirmation of the modelled pipework heat losses; • Include any replacement / repair cycles and the annual running costs for the occupiers; • Floor plans highlighting the modelled dwellings across the development and showing all rooms (with unique reference number). The applicant is expected to model the following most likely to overheat dwellings: <ul style="list-style-type: none"> ○ At least 15% of all rooms across the development site; ○ All single-aspect dwellings facing west, east, and south; ○ At least 50% of rooms on the top floor; ○ 75% of all modelled rooms will face South or South/west; ○ Strategy that mitigates any risk of crime / noise and / or air pollution in line with the AVO Residential Design Guide, with windows closed at all times (unless they do not need to be opened and confirmed in the Noise and the Air Quality Assessments). <p>(b) Any overheating mitigation measures set out in an approved Overheating Assessment shall be implemented before any of the dwellings in the Block to which they relate are first occupied and retained thereafter for the lifetime of the development.</p> <p>REASON: In the interest of reducing the impacts of climate change, to enable the Local Planning Authority to assess overheating risk and to ensure that any necessary mitigation measures are implemented prior to construction, and maintained, in accordance with London Plan (2021) Policy S14 and Local Plan (2017) Policies SP4 and DM21.</p> <p><u>Building User Guide</u> Prior to occupation of each plot/block, a Building User Guide for new residential occupants shall be submitted in writing to and for approval by the Local Planning Authority. The Building User Guide will advise residents how to operate their property</p>	

Stakeholder (LBH)	Comments	Response
	<p>during a heatwave, setting out a cooling hierarchy in accordance with London Plan (2021) Policy SI4 with passive measures being considered ahead of cooling systems for different heatwave scenarios. The Building User Guide should be easy to understand, and will be issued to any residential occupants before they move in, and should be kept online for residents to refer to easily.</p> <p>Reason: In the interest of reducing the impacts of climate change and mitigation of overheating risk, in accordance with London Plan (2021) Policy SI4, and Local Plan (2017) Policies SP4 and DM21.</p> <p><u>Living Roofs/Walls – Detailed and Outline</u></p> <p>(a) Prior to the above ground commencement of development by phase/block, details of the living roofs and/or living wall must be submitted to and approved in writing by the Local Planning Authority. Living roofs must be planted with flowering species that provide amenity and biodiversity value at different times of year. Plants must be grown and sourced from the UK and all soils and compost used must be peat-free, to reduce the impact on climate change. The submission shall include:</p> <ul style="list-style-type: none"> i) A roof plan identifying where the living roofs will be located; A ground floor plan identifying where the living walls will be rooted in the ground, if any; ii) A section demonstrating settled substrate levels of no less than 120mm for extensive living roofs (varying depths of 120-180mm), and no less than 250mm for intensive living roofs (including planters on amenity roof terraces); iii) Roof plans annotating details of the substrate: showing at least two substrate types across the roofs, annotating contours of the varying depths of substrate iv) Details of the proposed type of invertebrate habitat structures with a minimum of one feature per 30m² of living roof: substrate mounds and 0.5m high sandy piles in areas with the greatest structural support to provide a variation in habitat; semi-buried log piles / flat stones for invertebrates with a minimum footprint of 1m², rope coils, pebble mounds of water trays; 	

Stakeholder (LBH)	Comments	Response
	<p>v) Details on the range and seed spread of native species of (wild)flowers and herbs (minimum 10g/m²) and density of plug plants planted (minimum 20/m² with roof ball of plugs 25m³) to benefit native wildlife, suitable for the amount of direct sunshine/shading of the different living roof spaces. The living roofs will not rely on one species of plant life such as Sedum (which are not native);</p> <p>vi) Roof plans and sections showing the relationship between the living roof areas and photovoltaic array; and</p> <p>vii) Management and maintenance plan, including frequency of watering arrangements.</p> <p>viii) A section showing the build-up of the blue roofs (if any) and confirmation of the water attenuation properties, and feasibility of collecting the rainwater and using this on site;</p> <p>(b) Prior to the occupation of 90% of the dwellings of that block, evidence must be submitted to and approved by the Local Planning Authority that the living roofs/walls have been delivered in line with the details set out in point (a). This evidence shall include photographs demonstrating the measured depth of substrate, planting and biodiversity measures. If the Local Planning Authority finds that the living roofs/walls have not been delivered to the approved standards, the applicant shall rectify this to ensure it complies with the condition. The living roofs/walls shall be retained thereafter for the lifetime of the development in accordance with the approved management arrangements.</p> <p>Reason: To ensure that the development provides the maximum provision towards the creation of habitats for biodiversity and supports the water retention on site during rainfall. In accordance with London Plan (2021) Policies G1, G5, G6, S11 and S12 and Local Plan (2017) Policies SP4, SP5, SP11 and SP13.</p> <p><u>BREEAM – Detailed and Outline</u></p> <p>(a) Prior to commencement of the relevant block, a design stage accreditation certificate for every type of non-residential category (new build and refurbishment) must be submitted to the Local Planning Authority confirming that the development will achieve a</p>	

Stakeholder (LBH)	Comments	Response
	<p>BREEAM “Very Good” outcome (or equivalent), aiming for “Excellent”. This should be accompanied by a tracker demonstrating which credits are being targeted, and why other credits cannot be met on site.</p> <p>The development shall then be constructed in strict accordance with the details so approved, shall achieve the agreed rating and shall be maintained as such thereafter for the lifetime of the development.</p> <p>(b) Prior to occupation, a post-construction certificate issued by the Building Research Establishment must be submitted to the local authority for approval, confirming this standard has been achieved.</p> <p>In the event that the development fails to achieve the agreed rating for the development, a full schedule and costings of remedial works required to achieve this rating shall be submitted for our written approval with 2 months of the submission of the post construction certificate. Thereafter the schedule of remedial works must be implemented on site within 3 months of the Local Authority’s approval of the schedule, or the full costs and management fees given to the Council for offsite remedial actions.</p> <p>Reason: In the interest of addressing climate change and securing sustainable development in accordance with London Plan (2021) Policies SI2, SI3 and SI4, and Local Plan (2017) Policies SP4 and DM21.</p> <p><u>Climate Change Adaptation – Outline</u> Each application for the first reserved matters relating to Appearance, Layout or Scale submitted by phase/block shall be accompanied by annotated plans and details on what measures will be delivered to the external amenity areas that will help adapt the development and its occupants to the impacts of climate change through more frequent and extreme weather events and more prolonged droughts.</p>	

Stakeholder (LBH)	Comments	Response
	<p>Reasons: In the interest of addressing climate change and securing sustainable development in accordance with London Plan (2021) Policies SI2, and SI7, and Local Plan (2017) Policies SP4 and DM21.</p> <p><u>Circular Economy – Outline</u> Each application for reserved matters shall be accompanied by a detailed Circular Economy Statement in line with the GLA’s Circular Economy Statement Guidance, which shall be submitted to and approved in writing by the Local Planning Authority. The statement shall adhere to the principles set out in the draft Circular Economy Statement. The development shall be carried out in accordance with the details so approved.</p> <p>Reason: In the interests of sustainable waste management and in order to maximise the re-use of materials in accordance with London Plan (2021) Policies D3, SI2 and SI7, and Local Plan (2017) Policies SP4, SP6, and DM21.</p> <p><u>Circular Economy – Detailed and Outline</u> Prior to the occupation of any phase / building/ development, a Post-Construction Monitoring Report should be completed in line with the GLA’s Circular Economy Statement Guidance.</p> <p>The relevant Circular Economy Statement shall be submitted to the GLA at: circulareconomystatements@london.gov.uk, along with any supporting evidence as per the guidance. Confirmation of submission to the GLA shall be submitted to, and approved in writing by, the Local Planning Authority, prior to the occupation of any phase / building/ development.</p> <p>Reason: In the interests of sustainable waste management and in order to maximise the re-use of materials in accordance with London Plan (2021) Policies D3, SI2 and SI7, and Local Plan (2017) Policies SP4, SP6, and DM21.</p>	

Stakeholder (LBH)	Comments	Response
	<p><u>Whole Life Carbon – Detailed Outline</u> Prior to the occupation of each building, the post-construction tab of the GLA’s Whole Life Carbon Assessment template should be completed in line with the GLA’s Whole Life Carbon Assessment Guidance. The post-construction assessment should provide an update of the information submitted at planning submission stage. This should be submitted to the GLA at: ZeroCarbonPlanning@london.gov.uk, along with any supporting evidence as per the guidance. Confirmation of submission to the GLA shall be submitted to, and approved in writing by, the Local Planning Authority, prior to occupation of the relevant building.</p> <p>Reason: In the interests of sustainable development and to maximise on-site carbon dioxide savings in accordance with London Plan (2021) Policy SI2, and Local Plan (2017) Policies SP4 and DM21.</p> <p>Further DEN conditions may be added by the DEN Energy Infrastructure Manager.</p> <p>Planning Obligations Heads of Terms (TBC)</p> <ul style="list-style-type: none"> - Be Seen commitment to uploading energy data - Energy Plan and Sustainability Review for Phase 1 and all RMAs - Site-wide energy plan - Deferred carbon offset contribution mechanism (and associated obligations for additional and deferred offset contributions), plus a 10% management fee (based on £2,850 per tonne of carbon emissions) - DEN connection (and associated obligations) - DEN connection charge - Heating strategy fall-back option if not connecting to the DEN 	
Regeneration Officer	We’re both ok with the scheme.	

Stakeholder (LBH)	Comments	Response
		Comments have been taken into account.
Nature Conservation Officer	<p>A Strategic Ecology Report bringing together the Preliminary Ecological Appraisal and information collated in RIBA S1 report for the Proposed Development, comprising a desk study search for baseline information on designated sites, habitats and protected species. Lighting & bats Feasibility Report. Collectively seeking preliminary avoidance, mitigation and compensation measures for vegetation, trees, continued roosting opportunities for bats, sensitive lighting strategy, ecological enhancement opportunities measures, SuDS, bat roosts, wildlife rich landscape, Biodiversity Net Gain and good practice construction measures.</p> <p>The Environmental Statement specifies key mitigation measures, biodiversity protection during construction and operational phases. Management plans that would be secured by planning condition. A commitment to implementation of artificial bat roosts, nest-boxes for birds and habitat enhancement of the SINC. Green roofs and bee posts/bricks are also referenced.</p> <p>All have been prepared to current good practice guidance covering relevant legislation and policy</p> <p>Conclusion The report includes mitigation measures to be set out in the Construction Environmental Management Plan & Landscape and Ecological Management Plan. As such, the Construction Environmental Management Plan & Landscape and Ecological Management Plan should be secured by condition with reference to the Ecological Impact Assessment mitigation measures and approved prior to construction. The development seeks to enhance ecological features and the proposed mitigation and enhancement measures are satisfactory.</p>	Comments have been taken into account. Appropriate conditions will be secured.

Stakeholder (LBH)	Comments	Response
Tree Officer	<p>I hold no initial objections, from an arboricultural point of view to the above proposal (full and outlined). However, see my last comment of the e- mail.</p> <p>Overview An Arboricultural Impact Assessment has been carried out by The Environment Partnership with final signed off document dated 22/05/2022. The report has been done to the British Standard 5837: 2012 Trees in relation to demolition, design and construction-Recommendations.</p> <p>After attending site 09/08/2022 at around midday, I concur with much of the report including the tree quality classification. The executive summary leads with the tree population consisting of a wide range of species, including rare, unusual, and large individual specimens throughout the site, and the continuous tree cover on the south boundary. Over 50 tree species, shrubs, managed hedges, and plants were identified giving the site an arboretum feel. Much of the original planting and landscape has been associated with the naming of the current buildings on site.</p> <p>The north part of the site is within the St. Ann's Conservation Area (CA). There is also an individual and woodland (to the south of the site) model Tree Preservation Order (TPO). The deciduous woodland is a habitat of principal importance, and whilst non statutory, it is labelled a site of importance, and nature conservation (SINC).</p> <p>Baseline 226 individual trees, 32 groups, and seven hedges have been surveyed for the whole site. There are 39 trees and four groups within the CA.</p>	<p>Comments have been taken into account. Appropriate conditions will be secured.</p>

Stakeholder (LBH)	Comments	Response
	<p>There is no Ancient Natural Semi Woodland or links to Community Forests however, there is one recognised, due to its unique features, veteran tree on site T196 Hawthorn species. There are no highlighted ancient hedgerows.</p> <p>Tree quality canopy cover statistics: Category A high quality trees = 0.224ha Category B moderate quality trees = 1.329ha (largest amount) Category C low quality trees = 0.6010ha Category U unretainable trees = 0.0289ha</p> <p>Notable trees highlighted are Central lawn area T50, T51, T187, T209, T211, T215, T216, T218, East area T38, T50, T56, T59 and T196, South area T108, T110, T115, Water Tower T134, T135, T138, T140 North area T154, T155, and the adjacent courtyard T152, T159, and T162. TPO trees are T1-T11, T38, T40, T44, T50, T53, T99, T100-T112, T187, T191, T196, and woodland TPO W1</p> <p>Trees for Removal and Retention The individual tree canopy total cover for the surveyed site is 1,0733ha, with group trees 1,109ha, and hedgerows adding 174.6m. The detailed proposal would have the removal of 71 individual trees, 15 tree groups, and 96.5m of hedgerow. This amounts to a canopy loss of 0.5277ha. The outlined component would be a further canopy loss 0.4143ha equating to 43 individual trees and 15 groups or parts of groups as well as 164m of hedgerow. From the above figures there appears to be a discrepancy in the hedgerow figures for the site.</p> <p>There would be the removal of the following in 1a- Cat.A: 2 trees loss of 0.0153ha, Cat. B 46 trees loss of 0.2901ha, Cat.C 22 trees 0.2041ha, and Cat U 2 trees loss of 0.0182ha.</p>	

Stakeholder (LBH)	Comments	Response
	<p>Notable trees to be removed are T13, T134, T152, T159, & T162. TPOd trees to be removed T1- T11 & T53</p> <p>New Plantings It is planned to re plant with 189 new trees in 1a. This would have a new potential cover of 0.2748ha and a net loss of 0.2529ha. 1b, 2, and 3 proposed new planting would be a further 66 large trees, 105 medium trees, and 28 small trees. This would represent an approximate canopy cover at 20 years of 0.2852ha. Whilst there is room for more future planting, this is a net loss, at maturity, of 0.1251ha.</p> <p>Further Information A comprehensive bat survey has been carried out. Five roosts have been marked. Natural England have commented on seeking standing advice regarding licences and mitigation. This will be mandatory. A biodiversity report indicates a 12.2% vis the Biological Net Gain Calculator.</p> <p>Conclusion The trees to be removed are generally short lived small to medium tree species that are replaceable. TPO Woodland trees G14 that are within the SINC have been highlighted for removal. This must be a typo error and mistake. These trees are outside the curtilage of the development and cover the embankment along the rail line.</p> <p>Whilst there is a net loss of 0.3820 if all phases are delivered, the potential canopy growth should compensate for this along with the multi creation of matrix habitats that will improve the biodiversity net gain.</p>	

Stakeholder (LBH)	Comments	Response
	<p>From the Masterplans a wide diverse selection of trees has been selected for the site. This will allow the right cultivars and species for the site, wide all year-round interest, urban fitness, contrast, and canopy shape.</p> <p>The re plant trees will come in various sizes for instant impact and the smaller standard trees will establish over time with less risk of experiencing transport shock.</p> <p>Much of the new planting keeps in place the association with the named structures, new concepts, and the arboretum feel throughout the location.</p> <p>We will also require:</p> <p>A five year tree care after plan for limiting the loss and establishing independence within the landscape for the trees.</p> <p>A condition to replant for the loss of trees and areas highlighted for future tree planting.</p> <p>An on board Arboriculturist throughout the length of the project and for a period afterwards.</p> <p>Arboricultural method statements (AMS) for all and any works, operations, utilities, landscaping, and surfacing within the root protection areas (RPAs).</p> <p>Until we have assurance that the removal of G14 is a mistake, I cannot fully approve the scheme.</p> <p>Additional comments:</p> <p>1. If this [loss of G14] was decided at a pre- application stage with a small loss of SINC but also an extended area this appears acceptable.</p> <p>Many of the understory, category U removal for the delivery of the scheme should have regeneration from the seedbank at a later stage after completion.</p>	

Stakeholder (LBH)	Comments	Response
	<p>2) It will be for the applicant's agent to configure overall canopy future net gain and proposal for further planting.</p> <p>3) Hedgerow in the grand scheme compared to tree canopy is agreeable</p> <p>Further comments:</p> <p>As an overall AMS this is enough and can be conditioned.</p> <p>Should there be the need to carry any works within the RPA this can be discussed at the time.</p> <p>We would like the on board Arboriculturist to be available until completion for a project of this size.</p>	
Building Control Officer	No objections received.	Comments noted.
Flood and Water Management Officer	<p>Having reviewed the applicant's submitted document in form of Flood Risk Assessment and Drainage Strategy Report, N15301-PAM-ZZ-ZZ-RP-C-00001 Included:</p> <ul style="list-style-type: none"> a) Appendix A Topographical Survey b) Appendix B Thames Water Sewer Records c) Appendix C GPR Survey Drawings d) Appendix D Scheme Plans e) Appendix E Existing and Proposed Impermeable Area Plans f) Appendix F Greenfield Run-off Rates g) Appendix G Infiltration Test Results 	<p>Comments have been taken into account.</p> <p>Appropriate conditions will be secured.</p>

Stakeholder (LBH)	Comments	Response
	<p>h) Appendix H Proposed Drainage Drawings i) Appendix I Hydraulic Calculations j) Appendix L Thames Water Pre-Planning Enquiry</p> <p>We have the following comments to make on the submitted drainage proposals :</p> <ol style="list-style-type: none"> 1) Surface Water hydraulic simulations to be rerun to include a sensitivity check with a surcharged outfall into the existing TW sewer in St Ann's Road. 2) Appendix B, TW mapping shows 305mm Diameter outfall pipe from the site into St Ann's Road. This is confirmed in clause 2.1.1 (B). However, clause 8.0.2 states a 225mm Diameter outfall pipe to St Ann's Road. Confirmation by inspection of the existing pipe size for connection is requested. 3) Appendix K, we request that the applicant includes a drawing indicating proposed Exceedance Flood Flow paths showing, Proposed Surface and FFL levels. <p>Hope the above is helpful. Please do not hesitate to contact me should you require any further information.</p> <p>Additional comments:</p> <p>I have had a looked at the revised FRA and the relevant Appendices. We have no objection on this application and Happy for it to be approved subject to standard conditions of Drainage and it's maintenance.</p>	

Stakeholder (LBH)	Comments	Response
Waste Management Officer	<p>A pre application meeting to discuss this application and the operational waste management strategy (OWMS) for this development on the former St Anns Hospital site took place on 1st December 2021 with representatives from the council's waste and planning team present. The proposed waste strategy was discussed and the elements that did not completely comply with the councils current SPD, centring around the drag distances of bins from the proposed bins stores to the collection vehicle at the villa plots G and J being marginally above the specified 10m were looked at with alternative options suggested.</p> <p>This is a comprehensive OWMS which acknowledges national guidance, industry best practice and LB Haringey specific requirements as set out in our SPD. Access across the site, bin store sizing and drag distances, including that for blocks G and J, are all acceptable. An adjustment will need to be made in the type and number of communal food waste bins set out within the strategy. Guidance regarding food waste containment has been adjusted since the application was submitted with 140l wheeled bins now used in place of 360l bins (1 x 140l bin per 20 units). These will sit in the footprint on the 360l bins that have been allowed for within the bins stores of this development.</p> <p>The individual houses will be provided with fortnightly refuse collection (240l wheeled bin) and weekly mixed dry recycling (240l wheeled bin) and food waste collections (23l external caddy). The communal bins for all waste streams serving the flatted units in the blocks will be collected weekly (1100l bins for refuse and mixed dry recycling, 140l wheeled bins for food waste).</p> <p>Given the involvement of the waste team in pre application discussions and the acknowledgement of the comments from waste and planning officers during this which has been worked into the OWMS I can confirm that this can be supported</p> <p>Additional comments:</p>	<p>Comments have been taken into account. Appropriate conditions will be secured.</p>

Stakeholder (LBH)	Comments	Response
	<p>Regarding this additional information provided the applicant showing how provision for food waste within each communal refuse store has been accommodated given the need to change from 360l bins to 140l bins.</p> <p>I can confirm that this is acceptable with the waste team.</p>	
Pollution Officer	<p>Revised comments:</p> <p>Having considered all the relevant submitted supportive information i.e. Demolition Environmental Management Plan with reference WIE 18513 – 105 – R - 5 – 3 – 3 – DEMP prepared by Waterman Infrastructure & Environment Limited dated October 2022, Demolition & Construction Logistic Plan for Phase 1A/1B with reference WIE 18513.104.R.7.3.1.DCLP also prepared by Waterman Infrastructure & Environment Limited dated October 2022, Energy Statement prepared by XCO2 dated May 2022 with the proposed energy source for the development to be 100% Air Source Heat Pumps (ASHPs), Air Quality Assessment with reference 444238-01 (01) prepared by RSK Ltd dated May 2022 taken note of sections 3 (Assessment Scope & Methodology), (Baseline Air Quality Characterisation), 5 (Impact Assessment), 6 (Mitigation Measures & Residual Impacts) and 7 (Conclusions) and Contaminated Land Assessment with reference CLA – 21914J – 22 – 151 prepared by IDOM Ltd dated May 2022 taken note of sections 2 Phase 1 (Non – Intrusive Investigation), 4 (Ground Conditions), 5 (Environmental Assessment), 6 (Risk Assessment), 7 (Updated Conceptual Model), 8 (Detailed Remediation Strategy), 9 (Validation Reporting) and 10 (Conclusions), please be advise that we have no objection to the proposed development in relation to AQ and Land Contamination but the following planning conditions and informative are recommend should planning permission be granted.</p> <p>However, the applicant is advise that; a minimum of 450mm clean cover will be require for the communal landscaping rather than the proposed 300mm in the</p>	<p>Comments have been taken into account. Appropriate conditions will be secured.</p>

Stakeholder (LBH)	Comments	Response
	<p>remedial strategy whilst the private gardens remain 600m as submitted in section 8.5.2 of the contaminated land report.</p> <p>Moreover, whilst the attached Demolition Environmental Management Plan and Demolition & Construction Logistic Plan are noted and can form part of the information required for discharging the attached Demolition/Construction Environmental Management Plans condition, applicant will need to provide all the additional relevant information as it relates to the construction work for the development whilst also not neglecting information as it relates to proof of NRMM registration, Considerate Constructors Scheme registration as well as monitoring locations for dust and access to such monitoring results during the demolition and construction phase of the development.</p> <p>1. <u>Land Contamination</u></p> <p>Using the information already provided in section 8 (Detailed Remediation Strategy), of the Contaminated Land Assessment with reference CLA – 21914J – 22 – 151 prepared by IDOM Ltd dated May 2022, the applicant shall undertake before the occupation of the development:</p> <p style="padding-left: 40px;">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.</p> <p><u>Reason:</u> To ensure the development can be implemented and occupied with adequate regard for environmental and public safety.</p> <p>2. <u>Unexpected Contamination</u></p> <p>If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local</p>	

Stakeholder (LBH)	Comments	Response
	<p>Planning Authority) shall be carried out until a remediation strategy detailing how this contamination will be dealt with has been submitted to and approved in writing by the Local Planning Authority. The remediation strategy shall be implemented as approved.</p> <p>Reasons: To ensure that the development is not put at unacceptable risk from, or adversely affected by, unacceptable levels water pollution from previously unidentified contamination sources at the development site in line with paragraph 109 of the National Planning Policy Framework.</p> <p>3. NRMM</p> <p>a. Prior to the commencement of the development, evidence of site registration at http://nrmm.london/ to allow continuing details of Non-Road Mobile Machinery (NRMM) and plant of net power between 37kW and 560 kW to be uploaded during the demolition/construction phase of the development shall be submitted to and approved by the Local Planning Authority.</p> <p>Reasons: To protect local air quality and comply with Policy 7.14 of the London Plan and the GLA NRMM LEZ</p> <p>b. Evidence that all plant and machinery to be used during the demolition and construction phases of the development shall meets Stage IIIB of EU Directive 97/68/ EC for both NOx and PM emissions shall be submitted to the Local Planning Authority.</p> <p>Reasons: To protect local air quality and comply with Policy 7.14 of the London Plan and the GLA NRMM LEZ</p> <p>c. During the course of the demolitions, site preparation and construction phases, an inventory and emissions records for all Non-Road Mobile Machinery (NRMM) shall be kept on site. The inventory shall demonstrate that all NRMM is regularly</p>	

Stakeholder (LBH)	Comments	Response
	<p>serviced and detail proof of emission limits for all equipment. All documentation shall be made available for inspection by Local Authority officers at all times until the completion of the development.</p> <p>Reasons: To protect local air quality and comply with Policy 7.14 of the London Plan and the GLA NRMM LEZ</p> <p>4. <u>Demolition/Construction Environmental Management Plans</u></p> <p>a. Demolition works shall not commence within the development until a Demolition Environmental Management Plan (DEMP) has been submitted to and approved in writing by the local planning authority whilst</p> <p>b. Development shall not commence (other than demolition) until a Construction Environmental Management Plan (CEMP) has been submitted to and approved in writing by the local planning authority.</p> <p>The following applies to both Parts a and b above:</p> <p>a) The DEMP/CEMP shall include a Construction Logistics Plan (CLP) and Air Quality and Dust Management Plan (AQDMP).</p> <p>b) The DEMP/CEMP shall provide details of how demolition/construction works are to be undertaken respectively and shall include:</p> <p>i. A construction method statement which identifies the stages and details how works will be undertaken;</p> <p>ii. Details of working hours, which unless otherwise agreed with the Local Planning Authority shall be limited to 08.00 to 18.00 Monday to Friday and 08.00 to 13.00 on Saturdays;</p> <p>iii. Details of plant and machinery to be used during demolition/construction works;</p> <p>iv. Details of an Unexploded Ordnance Survey;</p> <p>v. Details of the waste management strategy;</p> <p>vi. Details of community engagement arrangements;</p>	

Stakeholder (LBH)	Comments	Response
	<p>vii. Details of any acoustic hoarding;</p> <p>viii. A temporary drainage strategy and performance specification to control surface water runoff and Pollution Prevention Plan (in accordance with Environment Agency guidance);</p> <p>ix. Details of external lighting; and,</p> <p>x. Details of any other standard environmental management and control measures to be implemented.</p> <p>c) The CLP will be in accordance with Transport for London's Construction Logistics Plan Guidance (July 2017) and shall provide details on:</p> <p>i. Dust Monitoring and joint working arrangements during the demolition and construction work;</p> <p>ii. Site access and car parking arrangements;</p> <p>iii. Delivery booking systems;</p> <p>iv. Agreed routes to/from the Plot;</p> <p>v. Timing of deliveries to and removals from the Plot (to avoid peak times, as agreed with Highways Authority, 07.00 to 9.00 and 16.00 to 18.00, where possible); and</p> <p>vi. Travel plans for staff/personnel involved in demolition/construction works to detail the measures to encourage sustainable travel to the Plot during the demolition/construction phase; and</p> <p>vii. Joint arrangements with neighbouring developers for staff parking, Lorry Parking and consolidation of facilities such as concrete batching.</p> <p>d) The AQDMP will be in accordance with the Greater London Authority SPG Dust and Emissions Control (2014) and shall include:</p> <p>i. Mitigation measures to manage and minimise demolition/construction dust emissions during works;</p> <p>ii. Details confirming the Plot has been registered at http://nrmm.london;</p> <p>iii. Evidence of Non-Road Mobile Machinery (NRMM) and plant registration shall be available on site in the event of Local Authority Inspection;</p> <p>iv. An inventory of NRMM currently on site (machinery should be regularly serviced, and service logs kept on site, which includes proof of emission limits for equipment for inspection);</p>	

Stakeholder (LBH)	Comments	Response
	<p>v. A Dust Risk Assessment for the works; and vi. Lorry Parking, in joint arrangement where appropriate.</p> <p>Additionally, the site or Contractor Company must be registered with the Considerate Constructors Scheme. Proof of registration must be sent to the Local Planning Authority prior to any works being carried out.</p> <p>Reason: To safeguard residential amenity, reduce congestion and mitigate obstruction to the flow of traffic, protect air quality and the amenity of the locality.”</p> <p>Informative:</p> <ol style="list-style-type: none"> 1. Prior to the demolition or construction on the existing land, 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. 	
Public Health	<p>1. Housing quality and design Key things we would like to see:</p> <ul style="list-style-type: none"> - Provision of affordable housing, responding to local housing needs - Good design through layout, orientation, and meeting space standards - Adaptable and accessible housing included <p>Comments: The development delivers mixed-use tenure and affordable housing (60% of homes are affordable by unit). The development will provide 90% M4(2) compliant dwellings and</p>	Comments have been taken into account.

Stakeholder (LBH)	Comments	Response
	<p>10% M4(3) compliant dwellings. The accessible units are spread across the development on different tenures. The proposal includes 38 homes for older adults (over 55s) with shared communal facilities on the ground floor of the building.</p> <p>2. Access to healthcare services and other social infrastructure Key things we would like to see:</p> <ul style="list-style-type: none"> - Nearby healthcare facilities e.g., GPs, Pharmacies - Access to a range of education establishments - Access to dedicated community space <p>Comments: The HIA clearly states the proximity to healthcare facilities, with capacity details, and proximity to education establishments. The HIA also references local dental practices within 1km of the site.</p> <p>Colleagues from NHS North Central London ICB have been consulted and submitted a response.</p> <p>3. Access to open space and nature Key things we would like to see:</p> <ul style="list-style-type: none"> - Access to parks - Play areas inclusive of all ages especially young children and adolescents - Range of formal and informal play spaces and equipment which should be age appropriate. The location of open spaces should avoid isolating specific areas and spaces to increase safety - Opportunities to integrate play spaces with other related health and environmental programmes such as food growing - Type of trees used to improve air quality and provide areas of shade - Opportunities for more greening e.g., green roofs and walls 	

Stakeholder (LBH)	Comments	Response
	<p>Comments: 20% of St Ann's ward is made up of open space, below the Haringey (25.2%) and London (27.2%) averages¹. The St Ann's ward has the fifth smallest proportion of open space of all Haringey wards and therefore, it is important to retain and grow green space throughout the site.</p> <p>Though the development is easily accessible to Chestnuts Park, it is good to see further opportunities for green and open space throughout, and the enhancement of the existing Peace Garden.</p> <p>There are formal and informal play opportunities throughout the site for under five years and five to 11 years. We would like to see the proposals detail the provision being provided for 12-16 years (i.e. Down Lane park nearby). It is important that there is play opportunity for all at this development.</p> <p>4. Air quality, noise and neighbourhood amenity Key things we would like to see:</p> <ul style="list-style-type: none"> - Provision of green space and trees can improve air quality and act as a noise barrier in urban areas - Construction management plans should lessen construction impacts, particularly air quality, construction traffic movements, noise levels, hours of working <p>Good design and the sensitive location and orientation of residential units can lessen noise impacts</p> <p>Comments: The HIA recognises the impact dust and particulate matter can have during the construction period and demonstrates the management of air quality and noise through a CEMP, to be prepared and secured prior to the start of construction.</p>	

¹ Haringey Council, (2020), *Haringey Ward Profile St Ann's*

Stakeholder (LBH)	Comments	Response
	<p>5. Accessibility and active travel Key things we would like to see:</p> <ul style="list-style-type: none"> - Details on the design of the secure cycle storage - Cycle storage for all users <ul style="list-style-type: none"> o Include larger cycle storage and enough space between o Easily accessed through no more than two sets of doors and well located (no narrow doorways and tight corners) - Promote cycling and walking as a sustainable option, connecting routes to wider networks <p>Comments: The proposal includes short and long stay cycle storage in secure and covered areas. It is encouraging to see of 5% spaces are fit for larger cycles (large enough to accommodate cargo bikes).</p> <p>The inclusion of welcome packs for future residents is a great idea particularly, as it aims to include information on sustainable and active travel – hopefully this will include all surrounding transport links (e.g., train station and bus stops). It would be useful to include location of healthcare services and other local provisions (e.g., community, leisure and active opportunities). Smokefree Housing – impact of smoking in homes on home maintenance and health impacts and support to stop smoking. Public Health would support this section if needed.</p> <p>6. Crime reduction and community safety Key things we would like to see:</p> <ul style="list-style-type: none"> - Development proposals incorporate ‘secured by design’ principles - Clear sight lines - Active use of public spaces with effective lighting 	

Stakeholder (LBH)	Comments	Response
	<p>Comments: It is encouraging to read in the HIA the incorporation of measures to ensure residents and visitors feel safe such as lighting systems, clear pathways and active frontages throughout.</p> <p>7. Access to healthy food Key things we would like to see: - Planning can assist by preserving and protecting areas for small-scale community projects and local food production, including allotments.</p> <p>Comments: The proposal states food growing, and edible planting is a key part of the development and the key shows sites for a growing hub, orchards, forest garden and residential courtyards that will include raised beds for food growing. This is very encouraging to see, offering opportunities for residents to be involved in food growing with access to some home-grown produce. It is good to see sites scattered throughout the development.</p> <p>We look forward to seeing how food growing on residential courtyards will be offered to residents.</p> <p>8. Access to work and training Key things we would like to see: - Providing job opportunities for all levels, apprenticeships to professionals</p> <p>Comments: 8.9% of St Ann's residents are unemployed. This is slightly higher than both the Haringey (8.6%) and London (7.3%) averages. We look forward to seeing more details on the provision of job opportunities and apprenticeships to the local population, through the commitment to sourcing construction workforce from the local area, and to support the</p>	

Stakeholder (LBH)	Comments	Response
	<p>8.9% unemployment rate and doing this with the support of colleagues working in Haringey Council.</p> <p>9. Social cohesion and lifetime neighbourhoods Key things we would like to see:</p> <ul style="list-style-type: none"> • Mixed-use developments in residential neighbourhoods can help to widen social options for people. • Intergenerational mixing to improve community cohesion and inclusive and Age-friendly design • Connectivity and permeability reducing community severance <p>Comments: The inclusion of housing for older people, adaptable homes and a high % of affordable units will create opportunity for intergenerational mixing, inclusive and age-friendly development.</p> <p>10. Minimising the use of resources Key things we would like to see:</p> <ul style="list-style-type: none"> - Require standards and criteria on hazardous waste disposal, recycling and domestic waste to that development proposal <p>Comments: Standards met.</p> <p>11. Climate change Key things we would like to see:</p> <ul style="list-style-type: none"> - The design proposal ensures that new housing and public realm can adapt to changes in temperature - Sustainable urban drainage systems in place to reduce the risk of flooding 	

Stakeholder (LBH)	Comments	Response
	<p>Comments: <i>Standards met.</i></p> <p>Conclusion The ethos of 'People and Landscape first' and developing a landscape of biodiversity and play is very encouraging from a public health perspective. The focus on people and their relationship with the green spaces on the site will ensure new residents are in good stead at using active travel, engaging with the outdoors and promotes a healthy place to live.</p> <p>The inclusion of a Health Impact Assessment ensures any negative impacts are minimised, whilst maximising positive health promoting environments.</p> <p>In conclusion, we believe this to be a comprehensive development that takes in to account the impacts on health and wellbeing of future residents, and we support the proposal.</p>	
Policy Officer	<p><u>Principle and Quantum of development</u></p> <p>Policy SP1 of the Local Plan Strategic Policies document sets out that the Council will promote development within Growth Areas and Areas of Change. The site allocation for this site sets out further details for the site including delivering a minimum of 456 residential units plus 5,100-sqm of other uses to enable a rationalisation and enhancement of the health facilities. An application for enhanced facilities on site was granted in 2018 and is now complete. Further works are ongoing to refurbish existing buildings. Policy SP14 of Haringey's strategic policies seeks to improve and protect health facilities, and alongside Policy S1 of the London Plan would resist the loss of health facilities unless re-provision is not needed or the loss would enable development of alternative or improved services. This principle is also set out within the site allocation.</p>	Comments taken into account.

Stakeholder (LBH)	Comments	Response
	<p>In this case, taking into account recent completed and ongoing works, the release of this site for development has been confirmed by the NHS to result in investment in refurbishment of buildings on the retained hospital campus to the east of the application site as well as the new, purpose-built mental health facility. The policy position (SP14 and LPS1) in this regard is therefore satisfied and the principle of residential and other uses being introduced onto this site is acceptable.</p> <p>Whilst the quantum of residential development is above the minimum in the site allocation, the site is a major development opportunity and can contribute to the Borough's housing target and as such is an important positive consideration. Policy SP2 of the Local Plan Strategic Policies document sets out that high quality new residential development in Haringey will be provided by ensuring that new development, amongst other things, meets the density levels set out in the Density Matrix of the London Plan. In July 2021 the Mayor published the new London Plan. This moves away from the use of a density matrix to a more holistic approach to making the best use of land and achieving sustainable densities. Policy D3 seeks to optimise site capacity through a design-led approach. This approach is consistent with policy DM11 of the Council's Development Management DPD which expects optimum housing potential of a site to be determined through a rigorous design-led approach. The quantum of 995 residential units can therefore be supported in principle, subject to detailed comments on the form and massing from the Council's Design Officer.</p> <p>With regards to the commercial and community floorspace proposed (flexible Class E /F1 and F2) of which a substantial component (3,905sqm) is proposed in refurbished existing buildings, which are located to the entrance of the development site and will help create a key destination for the new neighbourhood. The site allocation quantum for town centre floorspace is 148m2. The proposed quantum here is significantly above this, although noting that the proposed uses include workspace and community floorspace. London Plan Policy SD6 and Haringey Policy DM41 direct major new retail development to existing</p>	

Stakeholder (LBH)	Comments	Response
	<p data-bbox="465 276 1733 491">town centres. Given the flexible and wide ranging uses proposed it may lead to one type of town centre use arising that would trigger a need for an impact assessment on existing centres, therefore a commercial uses strategy should be secured. Generally however given the place-making objectives of the scheme, and the quantum of residential units, the proposed range of non-residential uses can be supported in helping to create a new community and would be appropriate in scale.</p> <p data-bbox="465 531 1733 675">The residential led development as enabling development for the redevelopment of the retained hospital generally accords with the Local Plan Strategic Policies document and relevant Site Allocation guidance and the principle of the proposal is therefore considered acceptable.</p> <p data-bbox="465 715 741 746"><u>Affordable Housing</u></p> <p data-bbox="465 786 1733 1010">The application documentation indicates the development will deliver a minimum of 60% affordable housing by habitable room, which exceeds the Councils target of 40%. 54% of the homes will be London Affordable Rent and 46% intermediate. The Council's target is for 40% of the affordable units to be intermediate products within this area and 60% to be affordable rent. The quantum exceeds the Borough target and the mix is within a few percent of the target and thus the quantum and mix can be supported.</p> <p data-bbox="465 1050 752 1082"><u>Transport & Access</u></p> <p data-bbox="465 1121 1733 1233">We note that detailed comments will be provided by the Transport team in connection with the application. The creation of a pedestrian and cycle link through this site to Warwick Gardens is in accordance with the site requirements and is supported.</p> <p data-bbox="465 1273 819 1305"><u>Amenity and Biodiversity</u></p>	

Stakeholder (LBH)	Comments	Response
	<p>The scheme will achieve an urban greening factor of 0.42 which exceeds London Plan Policy G5s target, and would also secure biodiversity net gain. This is supported.</p> <p><u>Flood Risk</u></p> <p>Comments on flooding and water management generally are reserved to the Council's drainage team.</p>	
Communities and Housing Support	<p>Just a couple of comments for me as my team had oversight of the internals before planning submission was made. and are happy with the proposed supported living schemes.</p> <p>1) Looking at the roof plan it is not easy to determine the number of PV's being included in the scheme. It is estimated that approximately 12% of residents over 60 are living in fuel poverty with this increasing for those with reduced mobility and long term health issues therefore I would be interested in understanding the impact of the sustainability measures being put into the C1 building and how this would benefit our residents?</p> <p>2) Outside the C1 building there is currently parking space provision. However many supported housing residents are reliant on taxi's and hospital transport to attend appointments and go shopping etc. Therefore, it would be useful for one of the parking spaces to be designated collection/drop off point rather than parking to prevent vehicles blocking the road.</p>	<p>Comments taken into account. Appropriate conditions will be secured.</p>

Stakeholder (External)	Comments	Response
Greater London Authority	*Comments provided in full in Appendix 4 below*	See below.
Transport for London	<p>I write to provide detailed strategic transport comments on this application reference 2022/0557. These reflect the matters raised in the GLA Stage 1 Planning Report GLA/2022/0557/S1/01 dated 30 August 2022. Please note that these comments are additional to any response that you may have received from colleagues within different parts of the Transport for London.</p> <p>Summary</p> <ul style="list-style-type: none"> - Further details on proposed highways and public realm works required. - Further detail on cycle parking required. - Improvements to travel plan required. - Revised trip generation and public transport impact assessment. <p>- Details on car parking ratio for each phase.</p> <p>Site location and context</p> <p>The site is bound by the B152 St Ann's Road to the north of the site, Warwick Gardens to the west, and Hermitage Road to the east. The London Overground Gospel Oak to Barking Reach railway viaduct is to the south. The nearest section of the Transport for London Road Network (TLRN) is the A503 Seven Sisters Road, 850 metres east. The A105 Green Lanes is part of the Strategic Road Network (SRN), 650 metres west.</p> <p>The site has a maximum public transport access level (PTAL) of 2 adjacent to St Ann's Road, served by the 67 and 341 bus routes. The site is not within PTAL walking distance of any stations but is approximately 1.1km from both Harringay Green Lanes London</p>	Comments noted. Conditions and planning obligations as appropriate would be secured.

Overground station, and Seven Sisters rail and underground station. The site is located approximately 1km to the west of Cycleway 1 at Tottenham High Road.

Vehicular, pedestrian and cyclist access

The proposals would retain the existing vehicle access point from St Ann's Road as a pedestrian and cyclist route only. The proposal would also introduce two vehicular access points to the east and west of the current site to St Ann's Road. However, it is not clear whether this would impact existing bus stops on this road and this should be clarified as any changes to bus assets would need to be agreed with TfL.

The site has a wider pedestrian, cyclist and vehicular access is supported and the applicant should provide further details with regards to the new access point to the south-west of the site. This should confirm that the design would align with the Healthy Streets agenda particularly at night and have 24hour access.

TfL would also expect the applicant to demonstrate how the site would link in to existing/ proposed cycle routes, facilitating and encouraging cycling as per London Plan Policy T5 point A.

The applicant should also show the wider pedestrian, cyclist and vehicular access through the site during the different construction phasing programme.

Highway works, public realm improvements and wayfinding

Given the scale of the proposals, the applicant is proposing works to the borough highway to compliment with the emerging low traffic neighbour to the north and is expecting to contribute to improve St Ann's Road between Green Lanes and Seven Sisters Road. TfL requests further information on this element on order to understand any impact on bus infrastructure. TfL welcomes the production of the detailed Healthy Streets TA and ATZ assessment. The ATZ assessment identified 6 key routes which were agreed with TfL. It is considered that the applicant should agree any necessary improvements with Haringey Council and the improvements should be inline with the relevant guidance.

TfL also welcome the new proposed link to Warwick Gardens and Stanhope Gardens, the link will come forward with the outline phase of development and will create a convenient walking and cycling route to Haringey Green Lanes and further increasing the PTAL of the site. TfL strongly support this link and this link should be secured via s106 agreement.

The applicant should also develop a wayfinding strategy for the wider masterplan site and surrounding areas to and from public transport hubs as new cycle and pedestrian links emerge. Any highways improvements or works should be secured via the appropriate mechanism.

Car parking & Controlled Parking Zone

The applicant is proposing a car lite scheme with a proposed parking ratio of 0.17 per dwelling, based on 995 homes which equates to a total of 156 spaces (including blue badge). TfL notes that this is London Plan compliant given the current and proposed PTAL for the outer London site. However, TfL seek clarity on the ratio for each detailed and outline phase. Regarding blue badge parking, the applicant is proposing 3% from the outset and an additional 2% if demand was to arise. It is noted that this was agreed with TfL and the London Borough of Haringey.

The applicant has created a Car Park Management Plan (CPMP) for the submission. Whilst this is welcomed, the plan should provide further information on the allocation of parking spaces. TfL suggests that the proposed split of the provision between private and affordable housing should be revised. It is noted that future occupants will have a 'right/permit' to park on site, details regarding reviewing these permits should be provided as part of the plan. Car parking quantum's (including BB) for the commercial seem acceptable for wider masterplan.

The site is not currently within a Controlled Parking Zone (CPZ) given the current land uses. Given the proposed parking strategy, the applicant should work with the Haringey Council to implement CPZs for this area to reduce any overspill parking and limit additional vehicle use. It is noted that the applicant is proposing 20% active and 80% passive provision for Electric Vehicle Charging Points (EVCP's). Whilst this is policy compliant – TfL would encourage 100% active for all spaces.

In addition to the above, all future occupants of the site would be exempt from applying for parking permits and this would be secured via S106.

Cycle parking

The applicant is committed to providing long and short stay cycle parking in accordance with the London Plan and London Cycle Design Standards across the whole site which is welcomed by TfL. However, it is requested that the applicant provides clarification that the

compliance for residential and commercial cycle parking in accordance with the LCDS. The applicant should also provide details on short stay cycle parking locations.

Regarding the outline application, TfL request further information on the expected layouts of the cycle parking. TfL would like clarification that the outline application area can accommodate London Plan complaint cycle parking spaces and this should be shown on plan.

Trip generation, highway impact and Vision Zero

TfL have a number of concerns over trip generation, highways impact and from a vision zero perspective.

Paragraph 3.11.4 shows that there are several collisions in hotspots through the local network, this should be investigated further from a Vision Zero perspective and seek changes to address these.

Table, 3.10 of the TA show mode share rates for inner London. However Haringey is defined as an outer London borough in the London Plan and this should be amended accordingly.

Table 6.4 shows the breakdown of an inner London site, which is inaccurate. Table 6.5 shows person trips which a deemed acceptable.

Table 6.6 shows expected trip rates for buses reduced from 16% to 7% and 42% walking mode share. TfL consider that the mode of travel should vary with time of travel, so higher walking share in the morning due to school travel, but more rail/bus trips because of the greater share of commuters. TfL would like to understand the basis of table 6.8.

Table 6.17 shows more bus trips than include in Table 6.18 and 6.19. It appears the applicant has underestimated the gross bus trips and may have reduced them further. For bus colleagues assessing the impact they do that against the current baseline. So, if the net away the 2014, then we still need to know the additional bus demand arising this development including the 2014 assumptions.

The applicant needs to address the above comments for TfL to be able to understand the impact on public transport.

Public realm proposals and active travel

The improvements of public realm within the site are welcomed. However, the applicant should work with London Borough of Haringey, reviewing the ATZ assessment to provide any potential improvements which may be required. TfL welcome further discussions with

the London Borough of Haringey and the developer to highlight the improvements. Any highways improvements should be secured by section 106 or 278 agreement as appropriate. As part of wayfinding, Legible London signage should also be updated/replaced/introduced on key routes to improve way finding to this proposed local destination. TfL welcomes further discussions upon this.

Travel planning

An outline travel plan setting out a range of measures to encourage active and sustainable travel has been submitted for the residential element of wider

masterplan. Officers note that several positive initiatives are included to boost active travel but further targets should be provided. In addition to this, the applicant has failed to provide information for the commercial travel plan of the scheme.

Details of travel planning measures and targets should be discussed further prior to determination. The final travel plan should be secured within the s106 agreement in accordance with London Plan policy T4.

Delivery & servicing

A Delivery and Servicing Plan (DSP) has been submitted as part of the submission. The management, overall level of servicing and locations are considered acceptable. However, the applicant should provide information on delivery and servicing whilst the different phases are being built. The applicant should identify whether the areas would be marked or signposted. The final DSP should be secured by planning condition.

Construction

The applicant has provided an Outline Construction Logistics Plan as part of the submission documents. The plan sets out indicative information about the construction programme including vehicle access routes, number of estimated construction vehicles and other measures.

Whilst TfL welcome the production of the document, TfL request further details and swept path analysis over for vehicles entering and exiting the site. Given the sheer volume of expected vehicles the plan should go into further detail for each phase and on site. In addition to the above, the plan should restrict delivery times from peak hours and school/start finishing times. The applicant should also clarify that all construction vehicles will

	<p>be Direct Vision Standard complaint. The applicant should also provide information on the construction staff facilities and cycle parking.</p> <p>The applicant should review their submission and update their CLP in accordance with TfL's latest guidance. The document should consider cyclist, pedestrians, and other road users. The final CLP should be secured by planning condition and TfL should be consulted prior to any commencement of works and reviewed at each stage.</p> <p>I trust that this provides you with a clear understanding of TfL's current position regarding the application.</p> <p>Kind regards, George Snape Area Planner – TfL Spatial Planning Email: GeorgeSnape@tfl.gov.uk</p>	
National Planning Casework Unit	<p>I acknowledge receipt of the environmental statement relating to the above proposal. I confirm that we have no comments to make on the environmental statement.</p>	<p>Comments noted.</p>
Network Rail	<p>Thank you for consulting Network Rail (NR) regarding the above planning application. Please see below the informative suggested by our Asset protection Team (ASPRO);</p> <p>Item 1. Issues - Encroachment on the boundary fence, interference with sensitive equipment, space for inspection and maintenance of the railway infrastructure.</p> <p>Reasons/Mitigations: The developer / designer must ensure that the development line is set back from the Network Rail fence line to achieve sufficient gap / space to inspect and maintain Network Rail fence line and provide an access for inspection and maintenance of the proposed development or other assets in the future without imposing any risks to the operational railway. This would normally be 2-5m from the boundary fence depending on the adjacent NR assets or boundary fence.</p> <p>Item 2. Issues - Stability of railway infrastructure and potential impact on the services.</p> <p>Reasons/Mitigations:</p>	<p>Comments taken into account and informatives secured.</p>

Existing railway infrastructures including embankment should not be loaded with additional surcharge from the proposed development unless the agreement is reached with Network Rail. Increased surcharge on railway embankment imports a risk of instability of the ground which can cause the settlement on Network Rail infrastructure (Overhead Line Equipment / gantries, track, embankment etc.).

Item 3. Issues - Potential buried services crossing under the railway tracks. Some of the services may be owned by Network Rail or Statutory Utilities that may have entered into a contract with Network Rail.

Reasons/Mitigations:

The developer is responsible for a detailed services survey to locate the position, type of services, including buried services, in the vicinity of railway and development site. Any utility services identified shall be brought to the attention of Senior Asset Protection Engineer (SAPE) in Network Rail if they belong to railway assets. The SAPE will ascertain and specify what measures, including possible re-location and cost, along with any other asset protection measures shall be implemented by the developer.

Item 4. Issues - Proximity of the development to the Network Rail infrastructure and boundary fence and adequate space for future maintenance of the development.

Reasons/Mitigations:

The developer must ensure any future maintenance does not import the risks to the operational railway. The applicant must ensure that the construction and subsequent maintenance of their development can be carried out without adversely affecting the safety of operational railway.

Item 5. Issues - Collapse of lifting equipment adjacent to the boundary fence/line.

Reasons/Mitigations:

Operation of mobile cranes should comply with CPA Good Practice Guide 'Requirements for Mobile Cranes Alongside Railways Controlled by Network Rail'. Operation of Tower Crane should also comply with CPA Good Practice Guide 'Requirements for Tower Cranes Alongside Railways Controlled by Network Rail'. Operation of Piling Rig should comply with Network Rail standard 'NR-L3-INI-CP0063 - Piling adjacent to the running line'. Collapse radius of the cranes should not fall within 4m from the railway boundary unless possession and isolation on NR lines have been arranged or agreed with Network Rail.

Item 6. Issues - Collapse of temporary structure near the railway boundary and infrastructure.

Reasons/Mitigations:

Any temporary structures which are to be constructed adjacent to the railway boundary fence (if required) must be erected in such a manner that at no time will any item fall within 3 metres from the live OHLE and running rail or other live assets. Suitable protection on temporary works (for example: Protective netting around scaffold) must be installed.

Item 7. Issues - Piling adjacent to the railway infrastructure if any. Issues with ground movement affecting the track geometry and surrounding ground and structure stability.

Reasons/Mitigations:

The developer must ensure that any piling work near or adjacent to the railway does not cause an operational hazard to Network Rail's infrastructure. Impact/Driven piling scheme for a development near or adjacent to Network Rail's operational infrastructure needs to be avoided, due to the risk of a major track fault occurring. No vibro-compaction/displacement piling plant shall be used in development.

Item 8. Issues - Trespasses and unauthorised access through an insecure or damaged boundary fence.

Reasons/Mitigations:

Where required, the developer should provide (at their own expense) and thereafter maintain a substantial, trespass proof fence along the development side of the existing boundary fence, to a minimum height of 1.8 metres. Network Rail's existing fencing / wall must not be removed until it is agreed with Network Rail.

Item 9. Issues - Interference with the Train Drivers' vision from artificial lighting and human factor effects from glare.

Reasons/Mitigations:

Any lighting associated with the construction works (including vehicle lights) must not interfere with the sighting of signalling apparatus and/or train drivers' vision on approaching trains. The location and colour of lights must not give rise to the potential for confusion with the signalling arrangements on the railway. The developers should obtain Network Rail's Asset Protection Engineer's approval of their detailed proposals regarding lighting.

Item 10. Issues - Errant vehicle onto the railway land.

Reasons/Mitigations:

If there is hard standing area / parking of vehicles area near the property boundary with the operational railway, Network Rail would recommend the installation of vehicle incursion barrier or structure designed for vehicular impact to prevent vehicles accidentally driving or rolling onto the railway or damaging the railway lineside fencing.

Item 11. Issues - Potential impact on the adjacent railway infrastructure from the construction activities.

Reasons/Mitigations:

The applicant shall provide all construction methodologies relating to works that may import risks onto the operational railway and potential disruption to railway services, the assets and the infrastructure for acceptance prior to commencing the works. All works must also be risk assessed to avoid disruptions to the operational railway.

Item 12. Issues - Structural stability and movement of Network Rail Assets.

Reasons/Mitigations:

Network Rail's infrastructures should be monitored for movement, settlement, cant, twist, vibration etc if there are risks from the proposed development (if there the proposed development import these risks in the operational railway) to mitigate the risk of adverse impact to the operational railway in accordance with Network Rail standard 'NR/L2/CIV/177 - Monitoring track over or adjacent to building or civil engineering works'.

Item 13. Issues - Invasive or crawling plants near the railway.

Reasons/Mitigations:

The developer must ensure that the locations and extent of invasive plant (if any, for example: Japanese Knotweed) are identified and treated in accordance with the current code of practice and regulations if exists on site. Any asbestos identified on site should be dealt in accordance with current standard, Health and Safety Guideline and regulations by the developer.

Item 14. Issues - Environmental pollution (Dust, noise etc.) on operational railway.

Reasons/Mitigations:

Contractors are expected to use the 'best practical means' for controlling pollution and environmental nuisance complying all current standards and regulations. The design and construction methodologies should consider mitigation measures to minimise the generation of airborne dust, noise and vibration in regard to the operational railway.

	<p>Item 15. Issues - Close proximity to Level Crossing: close proximity .</p> <p>Reasons/Mitigations: Traffic management should be in place and carefully mitigated any traffic jam near level crossing .</p> <p>Network Rail strongly recommends the developer contacts the Asset Protection Team AssetProtectionAnglia@networkrail.co.uk prior to any works commencing on site, and also to agree an Asset Protection Agreement with us to enable approval of detailed works. More information can also be obtained from our website https://www.networkrail.co.uk/running-the-railway/looking-after-the-railway/asset-protection-and-optimisation/</p>	
<p>London Overground</p>	<p>No comments received.</p>	<p>Noted.</p>
<p>Health & Safety Executive</p>	<p>Headline response from HSE Headline Response from HSE'content'</p> <p>1. Substantive response for the local planning authority Thank you for consulting HSE about this application. Nature of ResponseAdvice provided to the planning authorityNature of Response Scope of consultation 1.1 It is noted the above application is for the Hybrid Planning Application seeking permission for: 1.4 For the avoidance of doubt, the headline of this substantive response relates to Phase 1A (Blocks C2, C3, and D3) of the development, which comprises of residential blocks of flats. The relevant buildings have an uppermost floor height of 19.125m, 19.125m, and 25.425m respectively. These are relevant buildings for which a fire statement and detailed drawings have been submitted. It is noted that these three residential blocks</p> <p>1.2 1) Detailed planning for Phase 1A, for:</p>	<p>Comments have been taken into account and conditions secured as appropriate.</p>

a) The change of use, conversion and alteration of seven existing hospital buildings within Phase 1A for a flexible range of uses (Use Class E, F1 / F2);

b) The demolition of some existing buildings (in accordance with the demolition plan);

c) The erection of new buildings for residential uses (Use Class C3); and

d) Alterations to the existing access road and installation of new vehicular, pedestrian and cycle accesses; landscaping including enlargement of the Peace Garden, associated car and cycle parking spaces and servicing spaces.

2) The demolition of existing buildings and structures in Phases 1B, 2 and 3 (in accordance with the demolition plan);

3) Outline planning (all matters reserved except access) for Phases 1B, 2 and 3 for:

a) The erection of new buildings for residential development (Use Class C3), commercial business and service (Use Class E), and local community and learning (Use Class F1/F2); and

b) Associated pedestrian and cycle accesses; landscaping including enhancements to the St Ann's Hospital Wood and Tottenham Railsides Site of Importance for Nature Conservation (SINC) car and cycle parking spaces and servicing spaces.

1.3 The new-build elements of Phase 1A of the St. Ann's New Neighbourhood comprises four new blocks of flats and two rows of terraced dwellinghouses as described below:

Plots A1 and A2 terraced dwellinghouses (G+2) with a top storey height of 6m;

Plots B1 and B2 terraced dwellinghouses (G+2) with a top storey height of 6m;

Block C1 (G+4) with a top storey at 12.825m above ground level;

Block C2/C3 (G+6) with a top storey at 19.125m above ground level;

Block D3 (G+8) with a top storey at 25.425m above ground level; and

Block D1/D2 (G+5) with a top storey at 15.975m above ground level.

each contain a single stair representing the escape stair as well as the firefighting access route to the upper floors.

1.5 Regarding the second part of the hybrid application for the outline application, it is noted on the design and access statement that the layout, scale, appearance and landscaping are reserved matters.

1.6 Therefore, HSE is unable to provide a full comment for this part. Should the Local Planning Authority be minded to grant outline planning permission, we strongly recommend the following:

Outline planning permission

- the outline planning permission is subject to a suitable condition requiring the submission of a satisfactory fire statement with any reserved matters application, and
- that HSE is consulted in conjunction with the Local Planning Authority's consideration of any reserved matters application. 1.7 This would ensure the purpose of HSE being made a statutory consultee for such applications is achieved.

• 1.8 It is recommended that the applicant uses the fire statement form available on gov.uk to provide the fire safety information.

• 2.1 It is noted within the application documents provided that the single staircase provided in Blocks C2 and C3 respectively, serve an ancillary area, the refuse store. It is further noted the refuse store is also accessed externally. If the internal access to the refuse store in Blocks C2 and C3 were no longer provided, for example, such that there is no connection with the single stair, this would prevent the risk of fire spreading and, accordingly, further protect the single escape stair situated within the adjoining blocks C2 and C3. The fire safety standard states that where a staircase forms part of the only escape route from a flat, it should not serve ancillary accommodation. As this ancillary accommodation can be accessed directly from outside, resolving this issue is unlikely to affect land use planning considerations.

- 2.2 Additionally, the single staircase of Block D3 serves ancillary areas such as the plant room and refuse store. The fire safety standard states that where a staircase forms part of the only escape route from a flat, it should not serve ancillary accommodation regarded as a fire risk, such as a plant room. Resolving this issue is unlikely to affect land use planning considerations as there is already direct access to outside from the

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2 Supplementary information for the applicant

The following points do not contribute to HSE's overall headline response and are intended only as advice for the applicant. These comments identify items that could usefully be considered now to reduce the risk of making changes to the design at a later stage, which could have planning implications.

Means of escape

- refuse store. Providing a separate access to the plant room can be achieved with internal alterations, relying instead only on the nearby exit to outside.

- 2.3 The fire statement (section 13) states: *"The development will rely on the existing hydrants, however, the condition of these hydrants is to be verified."* This is noted and will be subject to later regulatory consideration.

- 2.4 The fire strategy report (paragraph 4.42) states: *"The location of the hob within the kitchen area has not yet been proposed. It is recommended that the hob be located at a distance of at least 1.8m away from the escape route through the access room. This will require further review once the proposed hob locations have been finalised."* This is noted and will be subject to later regulatory consideration.

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Facilities for the fire service

	Internal layout of flats	
London Fire Brigade	No comments received.	Noted.
NHS North London Central ICB	<p>We note that this hybrid planning application comprises detailed and outline elements and proposes up to 995 new residential dwellings. 60% of the proposed dwellings will be affordable and will include community led housing, London Affordable Rent, London Shared Ownership and London Living Rent.</p> <p>The proposals also involve the retention and refurbishment of seven buildings for non-residential uses and the inclusion of up to 4,150sqm (GIA) of non-residential floorspace. The proposed scheme has been divided into four development phases (Phases 1a, 1b, 2 and 3) with Phase 1a as the detailed component of the application.</p> <p>We recognise and support the benefits of the scheme, including the delivery of new affordable homes, the provision of older adults' accommodation and Community Land Trust homes, the creation of new Jobs and employment opportunities and the enhanced and enlarged Peace Garden.</p> <p>The wider St Ann's Hospital's masterplan has delivered a new hospital building for mental health patients which opened in August 2020. Barnet, Enfield and Haringey Mental Health NHS Trust sold the remaining surplus land to the Greater London Authority in 2018. A supporting letter outlining the</p>	<p>Comments have been taken into account. Planning obligations will be secured as appropriate.</p>

	<p>NHS Trusts' position is provided at Appendix 5 of the Planning Statement. It confirms that the healthcare services that were previously provided on the site are now provided on the retained and consolidated hospital site and therefore does not result in a loss of operational capacity for the Trust.</p> <p>In addition, one of the minimum requirements of the GLA was for the proposals to give nomination rights over in relation to 22 London Living Rent homes to the NHS Trust for a period of 10 years. This was included within the sale agreement between the GLA and the NHS Trust. These homes are located in Phase 1a and Phase 3.</p> <p>Whilst, the ICB supports the proposals, the introduction of a significant number of new homes into the area will have an adverse impact of local primary care services.</p> <p>The applicant's submitted Environmental Statement identifies six GP practices within 1.2km of the development site (Table 6.11 and Figure 6.5). Collectively, these practices have a FTE GP to patient ratio of 1:3039 which is above the recommended standard of 1:1800 and suggests that these practices are working at or above capacity. Paragraph 6.101 of the Environmental Statement implies that two practices have surplus capacity. This includes Grove Road Surgery. However, the building this practice is located in is inadequate to accommodate the additional patients generated by the development.</p> <p>Paragraph 6.102 incorrectly assumes that there are 1,776 'GP places' available. This is a crude measure and doesn't take into account deficiencies at the other practices, including the closest</p>	
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	<p>practice – St Ann’s Road Surgery. In total, there is a net deficiency of 25,642 ‘places’ by this measure across the six practices. However, this should be treated with caution as GP practices do not operate on the basis of available ‘places’ and maintain an open practice list with an available workforce. Also, practices are now operating across a Primary Care Network using an increasingly multi-disciplinary workforce to deliver a wider range of services. The closest practice at St Ann’s Road Surgery, which is located in St Ann’s Road, directly opposite the St Ann’s Hospital site and situated within the Laurels Healthy Living Centre. New residents/patients are very likely to register with this practice. This practice and the health centre do not have the capacity to accommodate the additional demand generated by the development. There is a site-specific impact from this development proposal which cannot be directly mitigated using the CIL payment from the development. CIL funding is not a material consideration in the determination of a planning application, as CIL cannot be used to make the development acceptable in planning terms. Therefore, a s106 contribution is considered necessary. The NHS HUDU Planning Contributions Model (HUDU Model) has been used to calculate the s106 requirement. Using information on the proposed housing mix in the Planning Statement and Environmental Statement (Appendix 6.1 Outputs from the GLA Population Yield Calculator), the model calculates a primary healthcare s106 requirement of £368,795. This cost is based on an alteration/refurbishment cost as the contribution will be used to provide additional capacity for St</p>	
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	Ann's Surgery at the Laurels Healthy Living Centre by refurbishing and improving existing floorspace, including converting non-clinical space into clinical use.	
Environment Agency	<p>We have no objection to the proposals if the following conditions are attached to any grant of planning permission. Without these conditions we feel that the development would pose an unacceptable risk to groundwater, and we would object. We ask to be consulted on the details submitted for approval to your authority to discharge these conditions and on any subsequent amendments/alteration.</p> <p>Condition 1 – Land Affected by Contamination</p> <p>No development approved by this planning permission shall take place until a remediation strategy that includes the following components to deal with the risks associated with contamination of the site shall be submitted to and approved, in writing, by the local planning authority:</p> <ol style="list-style-type: none"> 1. A preliminary risk assessment which has identified: <ul style="list-style-type: none"> • all previous uses • potential contaminants associated with those uses • a conceptual model of the site indicating sources, pathways and receptors • potentially unacceptable risks arising from contamination at the site. 2. A site investigation scheme, based on (1) to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site. 3. The results of the site investigation and the detailed risk assessment referred to in (2) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken. 4. A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (3) are complete and 	Comments have been taken into account and conditions will be secured as appropriate.

	<p>identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action.</p> <p>Any changes to these components require the express written consent of the local planning authority. The scheme shall be implemented as approved.</p> <p>Reason</p> <p>Controlled waters are particularly sensitive at this location because the proposed development site is located within a Source Protection Zone 2 and an inner groundwater protection zone (SPZ1). Areas in SPZ1 are the catchment areas for sources of potable water, high quality water supplies usable for human consumption. Groundwater at this location is therefore particularly vulnerable to polluting uses on the surface. All development proposals are carefully monitored within SPZ1. This is in line with paragraph 174 of the National Planning Policy Framework.</p> <p>Condition 2 – Verification Report</p> <p>No occupation of any part of the permitted development shall take place until a verification report demonstrating completion of works set out in the approved remediation strategy and the effectiveness of the remediation shall be submitted to and approved, in writing, by the local planning authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met.</p> <p>Reason</p> <p>To ensure that the site does not pose any further risk to human health or the water environment by demonstrating that the requirements of the approved verification plan have been met and that remediation of the site is complete. This is in line with paragraph 174 of the National Planning Policy Framework.</p> <p>Condition 3 - Long Term Monitoring and Maintenance Plan for Groundwater</p> <p>No development should take place until a long-term monitoring and maintenance plan in respect of contamination including a timetable of monitoring and submission of reports to the Local Planning Authority, shall be submitted to and approved in writing by the Local Planning Authority. Reports as specified in the approved plan, including details of any necessary contingency action arising from the monitoring, shall be submitted to and approved in writing by the Local Planning Authority. Any necessary contingency</p>	
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measures shall be carried out in accordance with the details in the approved reports. On completion of the monitoring specified in the plan a final report demonstrating that all long-term remediation works have been carried out and confirming that remedial targets have been achieved shall be submitted to and approved in writing by the Local Planning Authority.

Reason

To ensure that the site does not pose any further risk to the water environment by managing any ongoing contamination issues and completing all necessary long-term remediation measures. This is in line with paragraph 174 of the National Planning Policy Framework.

Condition 4 – Unidentified Contamination

If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the local planning authority) shall be carried out until the developer has submitted a remediation strategy to the local planning authority detailing how this unsuspected contamination shall be dealt with and obtained written approval from the local planning authority. The remediation strategy shall be implemented as approved.

Reason

No investigation can completely characterise a site. This condition ensures that the development does not contribute to, is not put at unacceptable risk from, or adversely affected by, unacceptable levels of water pollution from previously unidentified contamination sources at the development site. This is in line with paragraph 174 of the National Planning Policy Framework.

Condition 5 – Borehole Management

A scheme for managing any borehole installed for the investigation of soils, groundwater or geotechnical purposes shall be submitted to and approved in writing by the local planning authority. The scheme shall provide details of how redundant boreholes are to be decommissioned and how any boreholes that need to be retained, post-development, for monitoring purposes will be secured, protected and inspected. The scheme as approved shall be implemented prior to the occupation of any part of the permitted development.

Reason

To ensure that redundant boreholes are safe and secure, and do not cause groundwater pollution or loss of water supplies in line with paragraph 174 of the National Planning Policy

Framework and Position Statement N Groundwater resources of 'The Environment Agency's approach to groundwater protection'.

Condition 6 – Piling / Foundation works Risk Assessment with Respect to Groundwater Resources

Piling, deep foundations and other intrusive groundworks using penetrative measures shall not be carried out other than with the written consent of the local planning authority. The development shall be carried out in accordance with the approved details.

Reason

To ensure that any proposed piling, deep foundations and other intrusive groundworks do not harm groundwater resources in line with paragraph 174 of the National Planning Policy Framework and Position Statement N. Groundwater Resources of 'The Environment Agency's approach to groundwater protection'.

Condition 7 – Infiltration of Surface Water onto the Ground

No drainage systems for the infiltration of surface water to the ground are permitted other than with the written consent of the local planning authority. Any proposals for such systems must be supported by an assessment of the risks to controlled waters. The development shall be carried out in accordance with the approved details.

Reason

To ensure that the development does not contribute to, is not put at unacceptable risk from, or adversely affected by, unacceptable levels of water pollution caused by mobilised contaminants. This is in line with paragraph 174 of the National Planning Policy Framework.

Additional comments:

Environment Agency Position

Based on a review of the submitted information, our position regarding the proposed development has not changed. **We have no further comments and wish to retain all previously recommended conditions given in our original response referenced NE/2022/134751/01.**

Advice

The submission of just the method statement for our Condition 6 (Piling) (ref: NE/2022/134751/01) would not be sufficient for us to recommend discharge of the condition. The CFA Piling Method Statement document submitted is a piling method statement rather than a full assessment of risk to controlled waters arising from foundation works at the site. The foundation works risk assessment should consider potential risks to groundwater resources that could arise as a result of deep piling works. A groundwater monitoring programme should be designed to collect information prior to and during the works to demonstrate that any piling (or other deep penetrative) works are not having an adverse impact on groundwater quality in the area. The piling risk assessment and groundwater monitoring plan should provide a mitigation / action plan should an adverse impact to groundwater quality be noted during the works.

A brief introduction to the potential hazards associated with piling through contaminated soils can be found at

<https://webarchive.nationalarchives.gov.uk/ukgwa/20031222163520/http://www.environment-agency.gov.uk/commondata/105385/piling.pdf>

Monitoring wells installed to support a piling risk assessment should be installed to at least 5m deeper than the deepest piled foundation to capture any impacts from the proposed groundworks during and post construction.

Final comments

Thank you for contacting us regarding the above application. Our comments are based on our available records and the information submitted to us. Please quote our reference number in any future correspondence and provide us with a copy of the decision notice for our records. This would be greatly appreciated.

Further additional comments:

We have reviewed the comments on the document entitled “221019 Conditions Tracker (EA) v2”. Please find our comments regarding the proposed amended wording for our conditions originally recommended in our response referenced NE/2022/134751/01.

Condition 1 – Land Contamination

We note that the Contaminated Land Assessment (IDOM Report Ref CLA-21914J-22-151 dated May 2022) is sufficiently developed in order for us to recommend the discharge of Condition 1 part 1 (Preliminary Risk Assessment) and part 2 (Site Investigation). We would have no objection to the pre-commencement removal of these parts however we would recommend that reference is made to the fact that due process (i.e. PRA and site investigation completed) has been followed.

We would recommend that “different parts of the site” is changed to “different phases of the site”, in order for the condition to refer to defined areas of the site.

The verification plan is usually included as part of this condition. We would have no objection to this being a separate condition however we would expect to be formally consulted on this.

We would also request to see any proposed wording such a condition.

Condition 2 – Verification Report

No objection to the change but we would recommend that wording is changed to “Prior to the occupation of the relevant phase”.

Condition 3 – Long-term monitoring

The SPZ1 location of this site is related to nearby deep chalk abstractions. The chalk is protected by a thickness of London Clay and so the risk is relatively low. However, we would need to know what is being proposed regarding piling works. Should foundation works at the site extend through the London Clay to deeper units then there is a risk of pathway creation to the deeper chalk. In this instance we would expect a programme of monitoring to ensure there is no negative impact to the sensitive chalk aquifer and nearby potable abstractions. Should the piles terminate in the clay however then we would likely conclude that the risk is low, and no monitoring plan is necessary. Until this has been clarified we would wish to retain the recommendation of this condition.

Condition 4 – Unexpected Contamination

We recommend that this condition remains unchanged. Please note that the extent of any potential unidentified contamination will be unknown and will not necessarily be constrained to a particular phase of the site. The condition states that no further development take place in the event of discovery of unidentified contamination, unless otherwise agreed in writing with the Local Planning Authority. This gives scope for informed decisions to be made regarding the extent of development to be paused dependent on the extent of any unidentified contamination (should this be discovered).

	<p>Condition 5 – Borehole Management We would recommend that this condition remains unchanged. The original wording covers any additional boreholes to be installed at the site, as well as existing boreholes installed for site investigation. We still require detail at how existing boreholes at the site are being secured, protected and inspected, as well as decommissioning details for these boreholes. As such the condition should cover both existing boreholes and any subsequent boreholes that may be installed at the site.</p> <p>Condition 6 – Piling We note that no document relating to this condition has been approved by the Environment Agency. The suggested wording change references an approved “piling method statement” however we would expect a Foundation Works Risk Assessment (FWRA) to be submitted to satisfy this condition. Please refer to the advice provided in previous correspondence (EA Letter Ref: NE/2022/134751/02 dated 18th October 2022). Unless a FWRA is approved by the Environment Agency prior to planning permission being granted, we would wish to retain the original condition wording.</p> <p>Final comments Thank you for contacting us regarding the above application. Our comments are based on our available records and the information submitted to us. Please quote our reference number in any future correspondence and provide us with a copy of the decision notice for our records. This would be greatly appreciated.</p>	
<p>Natural England</p>	<p>Natural England has no comment on this application with regards to statutory designated sites.</p>	<p>Comments have been taken into account.</p>
<p>Thames Water</p>	<p>Waste Comments With the information provided Thames Water has been unable to determine the waste water infrastructure needs of this application. Thames Water has contacted the developer in an attempt to obtain this information and agree a position for SURFACE WATER drainage, but</p>	<p>Comments have been taken into account. The</p>

	<p>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:- 1. Surface water capacity exists off site to serve the development or 2. A development and infrastructure phasing plan has been agreed with the Local Authority in consultation with Thames Water. 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. Or 3. All Surface water network upgrades required to accommodate the additional flows from the development have been completed. Reason - Network reinforcement works may be required to accommodate the proposed development. Any reinforcement works identified will be necessary in order to avoid flooding and/or potential pollution incidents. 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.</p> <p>Thames Water would advise that with regard to FOUL WATER sewerage network infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.</p> <p>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://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes</p> <p>Water Comments Following initial investigations Thames Water has identified that, the proposed development is located within Source Protection Zone of a groundwater abstraction source. These zones</p>	<p>recommended conditions and informatives will be secured, as appropriate.</p>
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are used for potable water sources for public water supply for which Thames Water has a statutory duty to protect. Thames Water request that the following condition be added to any planning permission. "Development here by approved shall not commence until a Source Protection Strategy detailing, how the developer intends to ensure the water abstraction source is not detrimentally affected by the proposed development both during and after its construction has been submitted to and approved by, the local planning authority in consultation with the water undertaker. The development shall be constructed in line with the recommendations of the strategy. Reason - To ensure that the water resource is not detrimentally affected by the development. More detailed information can be obtained from Thames Waters' Groundwater Resources Team email GroundwaterResources@Thameswater.co.uk Tel: 0203 577 3603. 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.

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://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes>

If you are planning on using mains water for construction purposes, it's important you let Thames Water know before you start using it, to avoid potential fines for improper usage. More information and how to apply can be found online at [thameswater.co.uk/buildingwater](https://www.thameswater.co.uk/buildingwater).

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://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes> Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk

Supplementary Comments

WW: SW – Consider alternate discharge location. We confirm that there will be sufficient capacity in our sewerage network to accept the surface water discharge rate provided as part of the enquiry, however this does not preclude the requirement as set out by London Plan Policy SI 13 Sustainable drainage, subsection B (the drainage hierarchy). Management

of surface water from the site should follow policy London Plan Policy SI 13 Sustainable drainage, subsection B (the drainage hierarchy), development should 'aim to achieve greenfield run-off rates' utilising Sustainable Drainage and where this is not possible information explaining why it is not possible should be provided to both the LLFA and Thames Water. Typically greenfield run off rates of 5l/s/ha should be aimed for using the drainage hierarchy. The hierarchy lists the preference for surface water disposal as follows; Store Rainwater for later use > Use infiltration techniques, such as porous surfaces in non-clay areas > Attenuate rainwater in ponds or open water features for gradual release > Discharge rainwater direct to a watercourse > Discharge rainwater direct to a surface water sewer/drain > Discharge rainwater to the combined sewer. This site does propose to limit surface water runoff to the QBar greenfield run-off rate with a variety of green and grey SuDS, both the flow rate and SuDS are acceptable and according to the London Plan. However, there is a culverted watercourse in the vicinity of the site and a watercourse is preferred over the surface water sewer for surface water disposal. The report incorrectly states "6.4.1 There are no watercourses within the vicinity of the Site." There is a culverted watercourse in St. Ann's road, flowing west to east and then banking north into Chestnuts Recreation Ground. SW disposal into the culverted water course should be evaluated to discharge this condition. Additionally, "6.1.3 Rainwater harvesting has not been included within the proposed design at this stage but may be considered during the detailed design," rainwater harvesting should be strongly considered and expected to be implemented where applicable (for example rain barrels or automated irrigation system utilising the below ground storage) to reduce mains water consumption and reduce the overall volume of surface water discharged off the site, which is proposed to increase.

FW – Please note there is a record of a 152mm FW sewer in the southwest corner of the site.

Additional comments:

Waste Comments

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://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes>

With regard to SURFACE WATER drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water we would have no objection. Management of surface water from new developments should follow Policy SI 13 Sustainable drainage of the London Plan 2021. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. Should you require further information please refer to our website.

<https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes>

Thames Water would advise that with regard to FOUL WATER sewerage network infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.

Water Comments

Following initial investigations Thames Water has identified that, the proposed development is located within Source Protection Zone of a groundwater abstraction source. These zones are used for potable water sources for public water supply for which Thames Water has a statutory duty to protect. Thames Water request that the following condition be added to any planning permission. "Development here by approved shall not commence until a Source Protection Strategy detailing, how the developer intends to ensure the water abstraction source is not detrimentally affected by the proposed development both during and after its construction has been submitted to and approved by, the local planning authority in consultation with the water undertaker. The development shall be constructed in line with the recommendations of the strategy. Reason - To ensure that the water resource is not detrimentally affected by the development. More detailed information can be obtained from Thames Waters' Groundwater Resources Team email GroundwaterResources@Thameswater.co.uk Tel: 0203 577 3603. 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.

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](https://www.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://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes>

<p>Historic England</p>	<p>Historic England provides advice when our engagement can add most value. In this case we are not offering advice. This should not be interpreted as comment on the merits of the application.</p> <p>We suggest that you seek the views of your specialist conservation and archaeological advisers. You may also find it helpful to refer to our published advice at https://historicengland.org.uk/advice/find/</p> <p>It is not necessary to consult us on this application again, unless there are material changes to the proposals. However, if you would like advice from us, please contact us to explain your request.</p> <p>Please note that this response relates to designated heritage assets only. If the proposals meet the Greater London Archaeological Advisory Service's published consultation criteria we recommend that you seek their view as specialist archaeological adviser to the local planning authority.</p>	<p>Comments taken into account.</p>
<p>Historic England (GLAAS)</p>	<p>Thank you for your consultation received on 2022-07-18.</p> <p>The Greater London Archaeological Advisory Service (GLAAS) gives advice on archaeology and planning. Our advice follows the National Planning Policy Framework (NPPF) and the GLAAS Charter.</p> <p>Assessment of Significance and Impact</p> <p>The planning application is not in an area of archaeological interest.</p> <p>Although the site is not in one of the borough's Archaeological Priority Areas, its size merits consideration for archaeological impact under the GLAAS Charter. There is archaeological interest at the site around understanding and managing the mediaeval use of the site, including historical connections with the Knights of St John of Jerusalem, and the former settlement at Hanger Lane Since the 2014 consent, a record of the historic buildings was produced and some archaeological trench evaluation took place in the north east corner of</p>	<p>Comments have been taken into account. The recommended condition will be secured.</p>

the site in 2018, comprising three trenches. A further 19 trenches were planned at the site in phases, but I am not aware that they were ever carried out.

Planning Policies

NPPF Section 16 and the London Plan (2021 Policy HC1) recognise the positive contribution of heritage assets of all kinds and make the conservation of archaeological interest a material planning consideration. NPPF paragraph 194 says applicants should provide an archaeological assessment if their development could affect a heritage asset of archaeological interest.

NPPF paragraphs 190 and 197 and London Plan Policy HC1 emphasise the positive contributions heritage assets can make to sustainable communities and places. Where appropriate, applicants should therefore also expect to identify enhancement opportunities. If you grant planning consent, paragraph 205 of the NPPF says that applicants should record the significance of any heritage assets that the development harms. Applicants should also improve knowledge of assets and make this public.

Recommendations

I advise that the development could cause harm to archaeological remains and field evaluation is needed to determine appropriate mitigation. However, although the NPPF envisages evaluation being undertaken prior to determination, in this case consideration of the nature of the development, the archaeological interest and/or practical constraints are such that I consider a two-stage archaeological condition could provide an acceptable safeguard. This would comprise firstly, evaluation to clarify the nature and extent of surviving remains, followed, if necessary, by a full investigation.

I therefore recommend attaching a condition as follows:

Condition No demolition or development shall take place until a stage 1 written scheme of investigation (WSI) has been submitted to and approved by the local planning authority in writing. For land that is included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI, and the programme and methodology of site evaluation and the nomination of a competent person(s) or organisation to undertake the agreed works.

If heritage assets of archaeological interest are identified by stage 1 then for those parts of the site which have archaeological interest a stage 2 WSI shall be submitted to and approved by the local planning authority in writing. For land that is included within the stage

	<p>2 WSI, no demolition/development shall take place other than in accordance with the agreed stage 2 WSI which shall include:</p> <ul style="list-style-type: none"> A. The statement of significance and research objectives, the programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works B. Where appropriate, details of a programme for delivering related positive public benefits C. The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material. This part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the stage 2 WSI. <p>Informative Written schemes of investigation will need to be prepared and implemented by a suitably professionally accredited archaeological practice in accordance with Historic England's Guidelines for Archaeological Projects in Greater London. This condition is exempt from deemed discharge under schedule 6 of The Town and Country Planning (Development Management Procedure) (England) Order 2015.</p> <p>This pre-commencement condition is necessary to safeguard the archaeological interest on this site. Approval of the WSI before works begin on site provides clarity on what investigations are required, and their timing in relation to the development programme. If the applicant does not agree to this pre-commencement condition, please let us know their reasons and any alternatives suggested. Without this pre-commencement condition being imposed the application should be refused as it would not comply with NPPF paragraph 205.</p> <p>I envisage that the archaeological fieldwork would comprise the following:</p> <p>Evaluation An archaeological field evaluation involves exploratory fieldwork to determine if significant remains are present on a site and if so to define their character, extent, quality and preservation. Field evaluation may involve one or more techniques depending on the nature of the site and its archaeological potential. It will normally include excavation of trial trenches. A field evaluation report will usually be used to inform a planning decision (pre-determination evaluation) but can also be required by condition to refine a mitigation strategy after permission has been granted.</p>	

<p>Metropolitan Police Designing Out Crime Officer</p>	<p><u>Section 1 - Introduction:</u></p> <p>Thank you for allowing us to comment on the above planning proposal.</p> <p>With reference to the above application we have had an opportunity to examine the details submitted and would like to offer the following comments, observations and recommendations. These are based on relevant information to this site (Please see Appendices), including our knowledge and experience as a Designing Out Crime Officer and as a Police Officer.</p> <p>It is in our professional opinion that crime prevention and community safety are material considerations because of the mixed use, complex design, layout and the sensitive location of the development. To ensure the delivery of a safer development in line with L.B. Haringey DMM4 and DMM5 (See Appendix), we have highlighted some of the main comments we have in relation to Crime Prevention (Appendices 1).</p> <p>We have met with the project Architects and agent to discuss Crime Prevention and Secured Design at both feasibility and pre-application stage and have discussed our concerns around the design and layout of the development which was taken into account by the Architects. They have not made mention specifically in the Design and Access Statement or within the planning submission documents referencing design out crime or crime prevention, which is of concern at this 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.</p> <p>Whilst in principle we have no objections to the site, we have recommended the attaching suitably worded conditions and an informative. The comments made can be easily be mitigated early if the Architects and Developer ensure that 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).</p> <p>If the Conditions are applied, we request the completion of the relevant SBD application forms at the earliest opportunity.</p>	<p>Comments have been taken into account. The recommended conditions and informatives will be secured, as appropriate.</p>
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The project has the potential to achieve a Secured by Design Accreditation if advice given 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.

Informative:

The applicant must seek the continual advice of the Metropolitan Police Service Designing Our 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 developm

	<p>and subsequent Condition that has been implemented with crime prevention, security and community safety in mind.</p> <p>Should the Planning Authority require clarification of any of the recommendations/comments given in the appendices please do not hesitate to contact us at the above office.</p>	
<p>Metropolitan Police</p>	<p>I refer to the recent application at St Anns General Hospital. As you may be aware Policing is a 24/7 service resourced to respond and deploy on an "on demand" and "equal access" basis, and is wholly dependent on a range of facilities for staff to deliver this. Where additional development is proposed the MPS aims to deploy additional staffing and additional infrastructure at the same level that is required to deliver Policing to the locality. It would be complacent not to do this because without additional support unacceptable pressure will be put on existing staff, and our capital infrastructure, which will seriously undermine our ability to meet the Policing needs of this development, and maintain the current level of Policing to the rest of Borough and the wider London area. The impacts of the development are such that they cannot be met without additional staff deployed at a level consistent with the current Policing of the locality of the development. The following infrastructure is required for all Policing activities in London:</p> <p>Staff set up costs</p> <ul style="list-style-type: none"> <input type="checkbox"/> Uniforms <input type="checkbox"/> Radios <input type="checkbox"/> Workstation/Office equipment <input type="checkbox"/> Patrol vehicles <input type="checkbox"/> Mobile IT: The provision of mobile IT capacity to enable officers to undertake tasks whilst out of the office in order to maintain a visible presence. <input type="checkbox"/> CCTV technologies: Automatic Number Plate Recognition (ANPR) cameras to detect crime related vehicle movements. <input type="checkbox"/> Police National Database (PND): Telephony, licenses, IT, monitoring and the expansion of capacity to cater for additional calls. 	<p>Comments have been taken into account. The recommended obligation will be secured.</p>

- The provision of police office accommodation.

Other capital infrastructure includes specialist equipment in use by Forensics, our tactical teams e.g. in firearms and dog handling, freestanding IT and data recording in relation to vulnerable groups, prisoner detention, transportation and processing including cells at core locations.

The MPS has an active estates review function minimising our premises need, in order to meet existing Policing demand. We unfortunately just can't afford to have buildings under used and will dispose of surplus buildings wherever necessary using receipts to re-invest in the wider estate.

The disposition of the Metropolitan Police Service as regards developments

A primary issue for the MPS is to ensure that new development makes adequate provision for the future Policing needs that it will generate. Like some other public services our primary funding is insufficient to be able to fund additional capital infrastructure to support new development when and wherever this new development occurs. Further there are no bespoke capital funding regimes, e.g. like Building Schools for the Future or the Health Lift, to provide capital re-investment in our facilities. We fund capital infrastructure by borrowing. However, in a service where over 90% of our budget is staffing related, our capital programme can only be used to overcome pressing issues with our existing facilities, or to re-provide essential facilities like vehicles once these can no longer be used. This situation has been recognised by the Association of Chief Police Officers nationally for some time and there are public statements which explain our particular funding difficulties.

Faced with unprecedented levels of growth being proposed across London, the Metropolitan Police Service have resolved to seek developer contributions to ensure that existing levels of service can be maintained as this growth takes place. We are a regular and constant participant in the statutory Planning process evidencing the impact of growth through work with local Councils in their Plan making, preparation of guidance, preparations for CIL and the consideration of individual Planning applications. Police nationally encourage this approach to offset the impact of growth on the Police service.

The Policing impact of additional development at this site

The proposed development will increase the population of this settlement by circa 1,805 people. It is a fact that additional dwellings will bring additional Policing demands. I do not doubt that there will be a corresponding increase in demand from new residents for Policing services across a wide spectrum of support and intervention, as they go about their daily lives at the site, in the locality, and across the Policing sub region.

The National Policy position to support our request exists in the NPPF as securing sufficient facilities and services to meet local needs is a Core Planning Principle [p9 Section 3, paragraph 20]. In addition the NPPF specifically seeks environments where crime and disorder and the fear of crime do not undermine the quality of life and community cohesion [p27 Section 8, paragraph 92b] and sets out that Planning Policies and decisions should deliver this [p38, Section 8, paragraph 92b].

The Police contribution request

£70,905.61 is sought to mitigate the additional impacts of this development because our existing infrastructure does not have the capacity to meet these and because, like some other services, we do not have the funding ability to respond to growth whenever and wherever proposed. We anticipate using rates and Home Office revenues to pay for staff salaries and our day to day routine additional costs [e.g. call charges on telephony and radios, vehicle maintenance and so on]. As already confirmed these sources do not have the capacity to fund additional borrowing for the additional capital infrastructure necessitated by the development.

It should be noted that the contributions for the MPS are only sought that are related in scale and kind to this development, and we confirm that the contribution will be used wholly to meet the direct impacts of this development and wholly in delivering Policing to it.

Accordingly the development should make provision to mitigate the direct and additional Policing impacts it will generate and cannot depend on the Police to just absorb these within existing limited facilities and where Police have no flexibility in our funding to do this. This request is not forced by current spending reductions although strictures across the public sector re-enforce the need to ensure that developments do mitigate the direct impacts they cause.

Is the contribution necessary to make the development acceptable in planning terms?

	<p>Crime and community safety are Planning considerations and ensuring accessibility for the public to Policing is important to community safety, combating and reducing crime and the fear of crime.</p> <p>Without the necessary contribution the development will be unacceptable in Planning terms and permission should not be granted as indicated in NPPF Guidance. The lack of capacity in existing infrastructure to accommodate the population growth and associated demands occasioned by the development means that it is necessary for the developer of the site to provide a contribution so the situation might be remedied. The request is directly related to the development and the direct Policing impacts it will generate based on an examination of demand levels in the Borough in which it is situated, adjacent areas and existing Policing demands and deployment in relation to this.</p> <p>The request is wholly related to the scale and kind of the application development. Without the necessary contribution to meet Police needs there is a formal objection to the development on sustainability grounds and because the development is unacceptable without the necessary contribution.</p> <p>I refer to the Planning appeal decisions attached where the current approach of Police in seeking contributions was determined as compliant by Inspectors and the Secretary of State. I confirm that the methodology employed in this request is similar to that used in these appeals subject of course to local data about Policing demand and deployment to each development.</p> <p>Conclusion</p> <p>My conclusion at this stage is in several parts.</p> <p>a] the development will have impacts on Policing and these will need to be adequately mitigated if it is to be sustainable, and the safety of the local community assured. That has to be a mutual interest between the Borough and the Metropolitan Police Service.</p> <p>b] Necessary primary Policing infrastructure needs to be considered in the viability of the development alongside for example schools and medical facilities.</p> <p>Please do give this your consideration and I suggest that we meet at your earliest convenience to hear how the LPA will make adequate provision to meet Policing needs as a result of the development.</p>	
	No comments received.	Noted.

London Borough of Hackney		
National Grid	No comments received.	Noted.

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

GREATERLONDONAUTHORITY

Planning report GLA/2022/0557/S1/01

30 August 2022

St Ann's Hospital

Local Planning Authority: Haringey

Local Planning Authority reference: HGY/2022/1833

<p>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.</p>
<p>The proposal Hybrid planning application for redevelopment of the former St Ann's hospital site to provide up to 995 dwellings (60% affordable housing) and up to 5,000 sq.m (GEA) commercial and community floorspace with retained former hospital buildings and new buildings up to 9 storeys.</p>
<p>The applicant The applicant is Hill Residential Ltd, Catalyst Housing Ltd, and Catalyst by Design Ltd and the architect is Karakusevic Carson.</p>
<p>Strategic issues summary Land use principles: The comprehensive residential-led redevelopment of surplus hospital land is strongly supported, in accordance with the principles set out in the Site Allocation. The proposals seek to optimise the development potential of the site and the proposed density is supported in principle. Subject to suitable controls the proposed non-residential uses would facilitate a well-balanced mix of commercial and community activity across the site. A substantial amount of public open space is provided in addition to the private amenity spaces, and this is strongly supported. Affordable housing: The development provides 60% affordable housing and is therefore eligible for the Fast-Track Route, subject to the necessary planning obligations regarding affordability and an Early-Stage Viability Review being secured. Urban design and heritage: The proposals seek to optimise the development potential of the site and no strategic concerns are raised in respect of the layout, height, and massing of the development. Less than substantial harm to the character and appearance of the conservation area is identified but this is outweighed by the public benefits of the proposal. Transport: Further details are required in relation to the impact of the development on bus infrastructure, highways works, car and cycle parking, trip generation, travel planning, servicing, and construction. Energy: Further justification is required as to the proposals for heat and energy generation in accordance with the London Plan energy hierarchy, specifically regarding the connections to the future District Heating Network and the proposals for three separate energy centres to serve the development. Further information is required on sustainable development and environment.</p>
<p>Recommendation That Haringey Council be advised that the application does not yet comply with the London Plan for the reasons set out in paragraph 127 of this report. Possible remedies set out in this report could address these deficiencies.</p>

Context

1. On 21 July 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".
 - Category 1B "Development (other than that which only comprises the provision of houses, flats, or houses and flats) which comprises or includes the erection of a building or buildings – (c) outside Central London and with a total floorspace of more than 15,000 square metres."
 - Category 1C "Development which comprises or includes the erection of a building of one or more of the following descriptions – (c) the building is more than 30 metres high and is outside the City of London".
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; take it over for his own determination; or allow the Council to determine it itself.
4. The environmental information for the purposes of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 has been taken into account in the consideration of this case.
5. 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

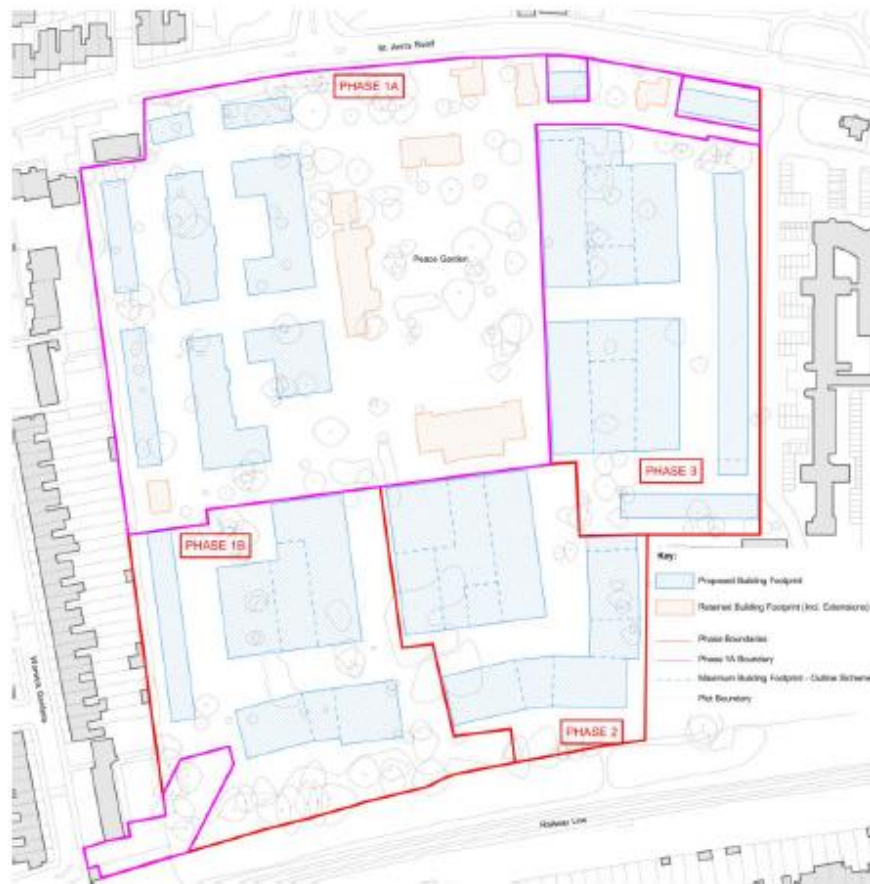
6. The application site comprises c. 7.2 hectares of land that used to form part of the St Ann's Hospital campus and contains a number of existing former hospital buildings. The 'new' St Ann's Hospital occupies just over one third of the original site and adjoins the site to the east, comprising various buildings ranging from 2-3 storeys in height. The application site is bound to the north by St Ann's Road, to the west by the rear gardens and parking courts of the houses and flats on Warwick Gardens, and to the south by the London Overground line.
7. The northern edge of the site falls within the St Ann's Conservation Area. Mayfield House, a large two-storey Victorian building located within the

application site, is locally listed and also falls within the conservation area. The part of the site adjacent to the railway embankment to the south is designated as a Site of Importance for Nature Conservation (SINC) and there are some mature trees covered by Tree Protection Orders on the site.

8. The application site currently has a public transport access level (PTAL) of 2 and is within walking distance of Green Lanes London Overground station, served by the Gospel Oak to Barking line. Seven Sisters station is 1.1km to the north east, served by the London Underground Victoria Line and the London Overground Liverpool Street to Cheshunt line. The nearest section of the Transport for London Road Network (TLRN) is the A503 Seven Sisters Road, 850 metres east. The A105 Green Lanes is part of the Strategic Road Network (SRN), 650 metres west. The site is adjacent to a bus stop providing services to Wood Green and Kingsland, and 160 metres from a bus stop providing services to Edmonton and Waterloo.

Details of this proposal

9. This is a hybrid application for residential-led development comprising the demolition of the majority of the existing buildings on the site and construction of new buildings to provide up to 995 new homes (60% affordable housing) and 5,000 sq.m. (GEA) non-residential floorspace to be flexible Use Classes E/ F1/ F2 (commercial/ learning and non-residential institutions/ community).
10. The application is divided into four phases: Phase 1a, which is subject to the detailed component of the application, and Phases 1b, 2 and 3 which are subject to the outline component. The site boundary and phasing boundaries are shown below together with the retained and proposed building footprints:



Phasing plan

Detailed component (Phase 1a)

11. The detailed component of the application proposes the change of use, conversion, and alteration of seven existing former hospital buildings for flexible Class E, F1, and F2 uses; the demolition of some existing buildings in accordance with the demolition plan; the erection of 8 new buildings for residential uses; alterations to the existing access road and the creation of a new vehicular, pedestrian and cycle access in the south west corner of the site to Warwick Gardens; and associated car, cycle and service parking.
12. Phase 1a is proposed to deliver 239 homes including 38 London Affordable Rent older adult homes; 22 London Living Rent homes; 34 Shared Ownership homes; and 145 private sale homes. This is in addition to 3,905 sq.m. (GEA) of commercial and community floorspace within the seven retained existing buildings.

13. In addition to the works within Phase 1a, the detailed component also includes the proposed demolition of buildings within Phases 1b, 2 and 3 in accordance with the demolition plan, which would not therefore be subject to consideration at reserved matters stage.

Outline component (phases 1b, 2 and 3)

14. The outline component of the application proposes the erection of new buildings for residential, commercial, service, and local community uses; associated pedestrian and cycle access; landscape enhancements; and associated car, cycle, and service parking.
15. Phases 1b, 2 and 3 are proposed to deliver up to 756 homes (Class C3). The indicative tenures for the outline component are 58 Community Land Trust homes; 284 London Affordable Rent homes; 73 London Living Rent homes; 86 Shared Ownership homes; and 255 market housing homes. Up to 1075 sq.m. (GEA) of new-build community and commercial floorspace would also be provided.
16. The outline component seeks approval of the Development Specification; Parameter Plans; and Design Code. These documents secure the quantum and quality of the development. All matters are to be reserved except for access.

Environmental statement

17. The hybrid application is accompanied by an Environmental Statement. For the purposes of the Environmental Impact Assessment the total number of homes is assessed as being up to 995 and the maximum quantum of non-residential floorspace is assessed as being up to 5,000 sq.m.

Case history

18. In 2014, a hybrid application was submitted for the entire St Ann's Hospital site. These proposals comprised:
 - A full application for the construction of 106 flats and 7 houses, ranging in height from 2 to 5 storeys; conversion of retained buildings to provide 7 houses and 148 sq.m of retail; car parking spaces; highway and public realm works; hard and soft landscaping; and access and associated development;
 - An outline application (with all matters reserved except for access) for the construction of new buildings and conversion of retained buildings ranging in height from 2 to 5 storeys to provide up to 350 residential units, new healthcare buildings, upgrade of existing access point off Hermitage Road; and open space and associated development.
 - An outline application (with all matters reserved except for scale and layout) for construction of a new mental health inpatient building up to 3 storeys in height and associated development.

19. In June 2014, this application was referred to the GLA at Stage 1 (Ref. D&P/3178). Haringey Council subsequently resolved to grant the application. The case was referred at Stage 2 in March 2015 (Ref. D&P3178/02) and the former Mayor was content to allow the council to determine the case, and so the application was granted. This planning permission was never implemented and has now lapsed.
20. The application site was previously owned by the Barnet, Enfield and Haringey Mental Health NHS Trust ('the NHS Trust') which still owns the land to the east of the site. Following a review of the future need for facilities by the NHS Trust, the decision was made in 2014 to sell a significant part of the former hospital site for residential-led development (i.e., the application site). This would create sufficient subsidy to deliver new and improved health facilities on the NHS Trust's remaining land. Accordingly, the application site was acquired from the NHS Trust by GLA Land and Property Limited in 2018.
21. An application was submitted in January 2018 for the construction of a two-storey hospital building for mental health patients on part of the retained 'new' St Ann's Hospital site, which will provide four wards for up to 70 inpatients. That application was granted by Haringey Council in May 2018 and the development is now complete.
22. Other works taking place to St Ann's Hospital on the retained site include the refurbishment of old wards and blocks for patient and support staff accommodation, the construction of a new patient, visitor and staff restaurant, staff education and training facilities, and a range of site infrastructure improvements including revised road layouts, landscaping, and car parking.

Strategic planning issues and relevant policies and guidance

23. 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 Haringey Development Management DPD, Strategic Policies DPD, Site Allocations DPD and Policies Map and the London Plan 2021.
24. The following are also relevant material considerations:
 - The National Planning Policy Framework and National Planning Practice Guidance;
 - National Design Guide.
25. Haringey Council is currently in the early stages of drafting a new Local Plan. The Regulation 18 stage of consultation concluded in March 2021. Detailed policies will not be formed until the Regulation 19 stage. Given that the draft Local Plan has not been published yet, the detail outlined within the Regulation 18 consultation documents are considered to hold very limited material weight in the decision-making process.

26. The relevant issues and corresponding strategic policies and guidance (supplementary planning guidance (SPG) and London Plan guidance (LPG)), are as follows:
- Good Growth - London Plan;
 - Housing - London Plan; Housing SPG; the Mayor's Housing Strategy; Play and Informal Recreation SPG; Character and Context SPG;
 - Affordable housing - London Plan; Housing SPG; Affordable Housing and Viability SPG; the Mayor's Housing Strategy;
 - Social infrastructure - London Plan; Social Infrastructure SPG; the Mayor's Health Inequalities Strategy;
 - Urban design - London Plan; Character and Context SPG; Public London Charter LPG; Housing SPG; Play and Informal Recreation SPG;
 - Heritage - London Plan;
 - Inclusive access - London Plan; Accessible London: achieving an inclusive environment SPG; Public London Charter LPG
 - Sustainable development - London Plan; Circular Economy Statements LPG; Whole-life Carbon Assessments LPG; 'Be Seen' Energy Monitoring Guidance LPG; Mayor's Environment Strategy;
 - Air quality - London Plan; the Mayor's Environment Strategy; Air Quality Neutral draft LPG; Control of dust and emissions during construction and demolition SPG;
 - Transport and parking - London Plan; the Mayor's Transport Strategy.

Land use principles

27. The application site is located within the Seven Sisters Corridor Area of Change which is designated as one of the main areas within the Haringey Strategic Policies DPD where growth will be directed. The site is also allocated within the Strategic Policies DPD. The site allocation (SA28) covers the whole of the former St Ann's Hospital site and provides an indicative capacity for 456 residential units, 148 sq.m. town centre uses, and 5,100 sq.m. of other uses.

Social infrastructure

28. Policy S1 of the London Plan sets out that development proposals that would result in a loss of social infrastructure for defined needs as identified in the borough's social infrastructure needs assessment should only be permitted where there are no realistic proposals for re-provision; or the loss is part of a wider public service transformation plan which requires investment in modern, fit-for-purpose infrastructure and facilities to meet future population needs; or to sustain and improve services. Furthermore, the policy states that redundant

social infrastructure should be considered for full or partial reuse as other forms of social infrastructure before alternative developments are considered, unless this loss is part of a wider public service transformation plan.

29. The release of the application site for development was considered following an extensive review of the future needs for facilities by the NHS Trust and this is reflected in the Site Allocation. The NHS Trust is using capital raised from the sale of the land for investment in refurbishment of buildings on the retained hospital campus to the east of the application site as well as the new, purpose-built mental health facility. All services which were provided on the site have now been consolidated into the retained campus. The applicant has submitted a letter outlining the NHS Trust's position which confirms that the redevelopment of the application site for other uses does not result in a loss of operational capacity or a loss of patient capacity, which is still provided by the new St Ann's Hospital campus. Accordingly, the proposals comply with London Plan Policy S1.

Residential-led development

30. London Plan Policy H1 sets out the requirements for boroughs to achieve the increased housing supply targets set out in Table 4.1, which identifies a ten-year housing completion target of 15,920 for Haringey. Accordingly, the application for residential-led development of the site, providing up to 995 new homes, is strongly supported in land use terms. The proposed density goes considerably beyond the indicative homes and commercial floorspace capacity in the Site Allocation, however GLA officers recognise that the site comprises a major development opportunity within the borough and is important in the delivery of development plan policies and targets, particularly with regard to affordable housing. As such the ambition to deliver a significant number of homes on this site within an identified Area of Change is strongly supported.

Commercial and community floorspace

31. The scheme includes the provision of up to 5,000 sq.m. (GEA) of commercial floorspace. 3,905 sq.m. of this will be delivered through the refurbishment of the seven retained buildings which are included within the detailed component and up to 1,075 sq.m. of new build floorspace which will be delivered within the outline component. All floorspace would be flexible Use Class E/ F1/ F2, to allow for a range of occupiers. The non-residential uses within the detailed component are largely located around the 'Peace Garden', the main open space for the new neighbourhood, and the site entrances. In this way these uses provide a focal point for the new neighbourhood and activation to the main spaces as well as maximum visibility for the public.
32. Within the outline component, the parameter plans indicate that the commercial floorspace within Phase 1b would be located close to the new route through to Warwick Gardens, providing activation and surveillance to this entrance and a sense of arrival into the development from this direction. The remainder would be located within Phase 3 on the east side of the Peace Garden.

33. London Plan Policy SD6 adopts a town-centre first approach, which recognises that town centres should be the focus for commercial development beyond the Central Activities Zone. The site is not within a designated centre and is approximately 1 mile (15 minutes' walk) east of Harringay Green Lanes district centre. There is a need to ensure that the flexible nature of the proposed commercial floorspace does not give rise to one type of use predominating which may trigger a need for an assessment of the impact on local centres. Where this can be appropriately managed, it is considered the proposed range of non-residential uses will facilitate a well-balanced mix of commercial activity and community use across the site and would be appropriate to the scale of the new neighbourhood. Accordingly, a commercial use strategy should be secured by planning obligation, and/or appropriate controls over the use of the flexible commercial space in planning conditions/obligations.
34. The list of proposed planning obligations in the Planning Statement indicates that affordable workspace is proposed to be secured within Phase 1a. This is strongly supported in accordance with London Plan Policy E3. Further details are required about the proposed quantum, affordability, and timing for the affordable workspace and how it will be secured if it is proposed within later phases.

Public open space

35. London Plan Policy G4 identifies that development proposals should create areas of publicly accessible open space where possible, particularly in areas of deficiency. The former hospital site included areas of open space that were technically accessible to the public, but were mainly used by patients, guests, and staff at the hospital. The proposed development would provide a substantial amount of public open space in the form of the Peace Garden park and a new neighbourhood square, as well as two smaller 'pocket parks' within Phases 1b and 2 ('Birch Grove' and 'Eastern Orchard'). GLA officers are satisfied that the development responds appropriately to Policy G4 in this regard.

Land use principles conclusion

36. The comprehensive residential-led redevelopment of surplus hospital land is strongly supported, in accordance with the principles set out in the Site Allocation. The proposals seek to optimise the development potential of the site and the proposed density is supported in principle. Subject to suitable controls the proposed non-residential uses would facilitate a well-balanced mix of commercial and community activity across the site. A substantial amount of public open space is provided in addition to the private amenity spaces, and this is strongly supported.

Housing

37. The proposed unit size and tenure for the detailed component (Phase 1a) is:

	Affordable			Market	Total
	London Affordable Rent	London Living Rent	Shared Ownership		
1b 2p	36	10	16	42	104
2b 3p	2	0	0	13	15
2b 4p	0	12	12	63	87
3b 4p	0	0	0	0	0
3b 5p	0	0	6	9	15
3b 6p	0	0	0	18	18
Total	38	22	34	145	239
	40% London Affordable Rent 60% Intermediate				

38. For the outline component (Phases 1b, 2 and 3) an indicative housing mix is shown below. Exact numbers, together with the unit size mix, will be subject to reserved matters applications.

	Affordable				Market	Total
	London Affordable Rent	Community led housing (LLR)	London Living Rent	Shared Ownership		
Total	284	58	73	86	255	756
	56% London Affordable Rent 44% Intermediate					

39. The indicative tenure mix for the scheme as a whole is shown in the table below:

	London Affordable Rent	Community led housing (LLR)	London Living Rent	Shared Ownership	Market	Total
Total	322	58	95	120	400	995
	54% London Affordable Rent					
	46% Intermediate					

Affordable housing

40. London Plan Policy H4 seeks to maximise affordable housing delivery, with the Mayor setting a strategic target of 50% for all new homes to be genuinely affordable. London Plan Policy H5 states that the threshold level of affordable housing is a minimum of 50% on public sector land where there is no portfolio agreement with the Mayor. Schemes can follow the Fast Track Route and are not required to submit viability information if they meet or exceed the relevant threshold on site without public subsidy; are consistent with the relevant tenure split; meet other policy requirements and obligations subject to the satisfaction of the council and the Mayor; and demonstrate they have sought grant to increase the level of affordable housing.
41. Policy H6 of the London Plan sets out a preferred tenure split of at least 30% low-cost rent (London Affordable Rent or social rent), at least 30% intermediate (London Living Rent and shared ownership) and the remaining 40% to be determined by the local planning authority. The affordability of intermediate units must be in accordance with the Mayor's qualifying income levels, set out in the Affordable Housing and Viability SPG, and the London Plan Annual Monitoring Report. Affordability thresholds must be secured in the s106 agreement along with the relevant viability review mechanism (Early Stage Review in this case).
42. The Haringey Strategic Policies DPD has an affordable housing target of 40%, and a guideline tenure mix of 60% social rented and 40% intermediate. GLA officers understand that Haringey Council has no concerns about this site providing more than the 40% target in this case.
43. This site was acquired by the GLA from the NHS Trust in 2018. London Plan Policy H4 sets out that 50% affordable housing should be provided on public sector land, and therefore this is the threshold of affordable housing required by Policy H5 for this development to follow the Fast Track Route, without public subsidy. Across the whole development, the Planning Statement confirms that the development would provide 60% affordable housing by both unit and habitable rooms on site. The proposed tenure split would be consistent with

London Plan Policy H6 with 54% London Affordable Rent and 46% Intermediate (by unit). This is acceptable, but more detailed figures should be provided comparing the exact tenure percentages by both unit number and habitable room to ensure full compliance with London Plan policy.

44. Catalyst Housing will deliver the community-led homes. It is GLAP's responsibility to select a community organisation to acquire and manage these homes. To maintain a policy-compliant tenure split, it should be secured within the s106 that these homes are to be provided London Living Rent or equivalent. The community organisation must have the opportunity to be involved in designing their housing by participating in the design process for the relevant reserved matters application and this should also be appropriately secured. If the future community organisation does not have the capacity to acquire all of the homes allocated to this use, then they would be replaced with standard affordable homes provided by Catalyst Housing at London Living Rent.
45. It is stated that the NHS Trust will be given nomination rights in relation to 22 of the London Living Rent homes across phases 1a and 3 for key worker staff accommodation. This should also be appropriately secured within the s106.
46. The affordable housing provision would therefore exceed the threshold for the Fast Track Route and would be policy-compliant subject to suitable planning obligations. As can be seen above, the detailed component would be front-loaded with the delivery of private sale housing and the outline phase would be weighted significantly towards affordable housing. To ensure the affordable housing is delivered in the later phases, an appropriate occupation restriction mechanism must be secured within the s106. GLA officers would welcome the opportunity to be involved in the drafting of a suitable wording.
47. All affordable housing must comply with qualifying rents/ income levels and criteria, as set out in the Mayor's Affordable Housing and Viability SPG, and the London Plan Annual Monitoring Report. Affordability thresholds for a range of incomes should be identified for the Shared Ownership units and secured in the s106. In accordance with London Plan Policy H5, an Early-Stage Viability Review must also be secured in the s106 to be triggered if an agreed level of progress on implementation is not made within the agreed period.

Housing choice/ mix

48. The housing size mix specified for the detailed component responds largely positively to London Plan Policy H10, which states that schemes should generally consist of a mix of unit sizes in relation to the number of bedrooms. A good number of larger family homes are provided however these are largely allocated to market housing whilst the affordable housing, especially the London Affordable Rent units, are exclusively smaller units. Indicative unit sizes according to tenure are not provided for the outline component or the scheme as a whole although it is indicated that 17% of all homes would be 3 or 4 bedrooms. The outline component should ensure that a range of unit sizes, including larger family homes, are delivered as affordable housing. Indicative unit sizes by tenure should be provided for review prior to Stage 2 and the

applicant should continue to engage with the council to ensure that the overall housing mix appropriately responds to the local need for affordable housing.

Specialist older person housing

49. London Plan Policy H13 supports the provision of specialist older person housing which does not provide an element of care but is specifically designed and managed for older people (minimum age 55 years). Table 4.3 of the London Plan sets an annual benchmark of 110 units per annum for Haringey. The application will make a significant contribution towards this target by proposing 38 units of older person housing (36 x 1-bed and 2 x 2-bed) to be delivered in Phase 1a at London Affordable Rent, which is strongly supported. The older person's accommodation sits within the north-west part of the site, adjacent to the new vehicle entrance on St Ann's Road, close to the Peace Garden.
50. GLA officers are satisfied that the older person housing has been designed in accordance with the principles of Policy H13, to the highest standards of accessible and inclusive design as set out in the Design and Access Statement and includes appropriate mobility scooter parking facilities at ground floor level. 1no. designated Blue Badge parking space is allocated to this part of the development. All building entrances are access directly from the street and due to the low anticipated traffic levels in the neighbourhood, it is expected that people will be able to be dropped off/ picked up at any point within 50 metres of any entrance. This is acceptable.

Urban design

51. 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. Comments are based on the detailed drawings for the detailed component and the illustrative masterplan, Parameter Plans, and Design Codes for the outline phases.

Optimising development capacity and residential density

52. London Plan Policy D3 encourages the optimisation of sites, having regard to a site's context and capacity for growth, and existing and planned supporting infrastructure capacity including transport. It also states that higher density developments should generally be promoted in locations that are well connected to jobs, services, infrastructure, and amenities by public transport, walking and cycling. Policy D3 also states that the higher the density of a development, the greater the level of design scrutiny that is required, particularly the qualitative aspects of the design.
53. The development would have a residential density of c. 138 units per hectare and the total number of homes and amount of non-residential floorspace significantly exceeds the Site Allocation. The scheme has been subject to

robust design process with officers from Haringey Council and three Quality Review Panels. No strategic concerns are raised with regards to the buildings' height, massing or separation distances and the level of residential quality is high. The provision of public and private open amenity spaces is also a strongly positive element of the scheme. The site currently has a relatively low Public Transport Accessibility Level (PTAL) of 1b-2 but the proposed improvements to connectivity, particularly the new south-west pedestrian and cycle link which provides a shortcut to Harringay Green Lanes station, are expected to increase the PTAL. The proposed development density is therefore supported in accordance with London Plan Policy D3.

Height, massing, and townscape

54. Haringey's Strategic Policies DPD defines tall buildings as those which are substantially taller than their neighbours, have a significant impact on the skyline, are of 10 storeys or over and are otherwise larger than the threshold size set for referral to the Mayor of London. The proposed buildings would have a maximum height of 9 storeys and in line with the criteria above, are not considered to be tall buildings in the context of this site.
55. The building height strategy, which sees the tallest buildings bordering the Peace Garden and the railway with lower heights on the site's east and west edges, is supported. The proposed taller buildings overlooking the Peace Garden park would potentially make for a safer public space as well as increasing the number of homes that benefit from this desirable outlook. Views provided within the Design and Access Statement from within the Peace Garden demonstrate that the proposed massing appropriately balances site optimisation with retaining the sense of openness to the park and would not be overbearing. At the various site boundaries, the reduced massing responds well to the existing context which includes the St Ann's Conservation Area and the prevailing terraced-house typology on Warwick Gardens to the west.

Development layout and public realm

56. The layout of the proposed development derives from a landscape-led masterplan approach, incorporating a generous quantum of public open space and a considered network of private green spaces that tie into the broader context. The proposed blocks and key routes are aligned to create new routes through the site in addition to the provision of a new pedestrian and cycling connection to Warwick Gardens, significantly reducing journey times to Green Lanes. The proposal also includes new vehicular, pedestrian, and cycle entrances onto St Ann's Road. In response to the wider context and in particular the relationship with Chestnuts Park on the north side of the road, the applicant should provide an update on the status of discussions with the council to open up the park's southern fence line to provide a direct through-connection from the development to the park.
57. The distribution of varied building typologies across the site, in conjunction with the retained heritage buildings and layout of the new routes, help to define character areas across the masterplan that would promote legibility and sense of place for future residents. The submitted Design Code for the outline

component is considered to be robust and will serve to secure design quality throughout the future phases.

58. The proposed development is a 'car-lite' scheme with a parking ratio of 0.17 car parking spaces per dwelling across the scheme. Notwithstanding the requirement to provide the appropriate quantum of residential parking for this location efforts have been made to minimise parking provision to serve the pedestrian-focused environment throughout the neighbourhood and this is strongly supported. The parking provision, which is located in the form of parallel parking bays along key vehicle routes, does not unduly dominate the public realm. Within the detailed component, the interfaces between the ground floor layouts (including entrances, cycle and bin stores, private amenity space and boundary treatments) and the public realm are well-considered to contribute to an activated public realm with a good level of natural surveillance.

Residential quality

59. London Plan Policy D6 promotes quality in new housing provision, with further guidance provided by the Mayor's Housing SPG. Detailed floorplan layouts have been provided for the detailed component as well as more detailed layouts for each typical unit type within Phase 1a. GLA officers are satisfied that the residential quality responds positively to the standards in the London Plan and the Mayor's Housing SPG. The privacy impacts between the proposed residential units, and the relationship of the new development to adjoining properties, has clearly been carefully considered and the Daylight and Sunlight Report submitted with the application shows that 98% of the rooms within the proposed development meet daylight criteria in accordance with the BRE recommendations.
60. The Daylight and Sunlight report also considers the impact of the development on light to neighbouring properties that adjoin the site. It concludes that whilst there will be some larger reductions to individual windows that exceed BRE recommendations, this is generally due to the presence of existing light-obstructing features on these buildings. The Council should be satisfied that the impacts to all properties are within acceptable limits when balanced against the public benefits of the proposal.

Fire safety

61. Policy D12 of the London Plan requires a fire safety statement to be submitted which has been prepared by a suitably qualified third-party assessor, demonstrating how the development proposals would achieve the highest standards of fire safety, including details of construction methods and materials, means of escape, fire safety features and means of access for fire service personnel. Policy D5 of the London Plan also seeks to ensure that developments incorporate safe and dignified emergency evacuation for all building users. In all developments, where lifts are installed, as a minimum, at least one lift per core (or more, subject to capacity assessments) should be a fire evacuation lift, suitably sized to be used to evacuate people who require level access from the buildings.

62. The applicant has submitted a Fire Strategy Report prepared by Tenos who are fire engineering consultants. It should be confirmed that the author of the report is a suitably qualified professional. The report includes much of the information required to address how the development proposals will function in terms of the fire safety requirements of Policy D12(B) of the London Plan but is currently structured around the requirements of the Building Regulations. The Fire Strategy Report submitted should also specifically reference the requirements of Policy D12 Part B. Specifically, further detail is required regarding features which reduce the risk to life: fire alarm systems, passive and active fire safety measures, and associated management and maintenance plans; and how it will be ensured that any future modifications to the buildings will take into account and not compromise the base build fire safety and protection measures. A declaration of compliance in relation to both Policies D5 and D12 should also be included within the revised Fire Safety Strategy report prior to Stage 2, as set out in the Fire Safety draft LPG. A condition should be secured for compliance with the updated strategy.

Inclusive access

63. Policy D5 of the London Plan seeks to ensure that new development achieves the highest standards of accessible and inclusive design – not just the minimum. All applications should ensure that the development can be entered and used safely, easily and with dignity by all; it is convenient and welcoming; and provides independent access without additional undue effort, separation, or special treatment. London Plan Policy D7 requires that at least 10% of dwellings are wheelchair user dwellings.
64. In accordance with London Plan Policy D7, 10% (97) of the proposed dwellings across the whole scheme will be wheelchair user homes and designed to meet Building Regulation requirement M4(3) 'wheelchair user dwellings' with all other homes meeting Building Regulation requirement M4(2) 'accessible and adaptable dwellings'. The Access Statement confirms that wheelchair user homes would be distributed across dwelling size, tenure, and phase to ensure that future residents requiring a wheelchair adaptable dwelling have as much choice as anyone else, as far as possible.
65. Other key access provisions include step-free, level or gently sloping pedestrian routes; accessible on-street drop-off points close to building entrances; accessible cycle parking provision. The provision of a separate Access Statement within the submission documents, prepared by an access consultancy, is welcomed. This document is comprehensive and the detailed inclusive design measures outlined should be secured by condition.

Heritage

66. The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the statutory duties for dealing with heritage assets. The Act requires that special regard be given to the desirability of preserving the special interest of listed buildings or their settings, and also places a duty upon local planning authorities in determining applications for development affecting conservation

areas to pay special attention to the desirability of preserving or enhancing the character or appearance of that area. If it is judged that harm to the heritage assets would arise from the proposed development, considerable importance and weight must be attributed to that harm, in order to comply with the statutory duties.

67. The NPPF states that 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 an asset's physical appearance or its setting. Where a proposed development will lead to either total loss or 'substantial harm' to the significance of the 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 harm or loss. Where a development will lead to 'less than substantial harm' then the harm should be weighed against the public benefits of the proposal including securing the optimum viable use.
68. Policy HC1 of the London Plan states that development should conserve heritage assets and avoid harm, which also applies to non-designated heritage assets.
69. The St Ann's Conservation Area extends along the northern edge of the site and encompasses a number of existing buildings that front St Ann's Road including Mayfield House, which is a large two-storey Victorian building and is also locally listed. There are no statutory listed buildings within or adjacent to the application site. The nearest listed buildings are the Grade II* listed Parish Church of St Ann, the Grade II listed St Ann's Church School, and the Grade II listed 1-5 Avenue Road, which are c. 350m to the east ('the listed building group'). The Grade II* listed Salisbury Public House is c. 500m to the west.
70. GLA officers broadly agree with the assessment of significance of the identified heritage assets within the Heritage Statement and the assessment of the impact of the proposals on that significance. The proposed retention and reuse of Mayfield House, which sits at the northern end of the Peace Garden, is strongly supported and its retention and refurbishment would improve its appearance, character, and function. These works would also, to some degree, enhance the character and appearance of the St Ann's Conservation Area.
71. The submitted Heritage Statement concludes that there will be a degree of harm arising to the setting of the St Ann's Conservation Area from the fact that the new built form being constructed is at a scale and height greater than that of the existing townscape context. This harm is judged to be 'less than substantial' and at the lower end of the scale. GLA officers agree with this conclusion. It is considered that there would be no harm caused to the setting of the listed building group to the east or the listed Salisbury Public House to the west due to the distance between these assets and the application site and the limited visibility of the new buildings in the setting of the assets.

72. The harm identified to the conservation area must be given considerable importance and weight. As harm has been identified, the proposals do not comply with London Plan Policy HC1 however, in accordance with the provisions of the NPPF, the harm must be weighed against the public benefits. GLA officers consider that the harm identified would be comprehensively outweighed by the public benefits of the proposal, namely the provision of housing, including a significant amount of affordable housing, as well as new public open space and community facilities, through the sustainable redevelopment of previously developed land.

Transport

Vehicular, pedestrian, and cyclist access

73. The proposals would retain the existing vehicle access point from St Ann's Road as a pedestrian and cyclist route only and would introduce two new vehicular access points to the east and west of the current site entrance. This is supported however it is unclear how this would impact upon existing bus stops on St Ann's Road. This must be clarified prior to Stage 2 as any changes to bus assets would need to be agreed with TfL.

Highway works, public realm improvements, and wayfinding

74. Given the scale of the proposals, the applicant is proposing works to the borough highway and is expecting to contribute to improvements to St Ann's Road between Green Lanes and Seven Sisters Road. Further information on this element is requested, in order to understand any impact on bus infrastructure. The applicant has submitted a Healthy Streets Transport Assessment and an Active Travel Zone assessment and the ATZ assessment identifies 6 key routes which were agreed with TfL. Any necessary improvements arising as a result of the ATZ should be agreed with Haringey Council and secured by way of a suitable legal agreement.
75. The proposed pedestrian and cycle link to Warwick Gardens is also welcomed and will create a convenient walking and cycling route to Haringay Green Lanes station, significantly increasing the PTAL of this site. This link is integral to the success of the development and should be secured within the s106. The applicant should develop a wayfinding strategy for the wider masterplan site and surrounding areas to and from public transport hubs as new cycle and pedestrian links emerge.

Car parking and Controlled Parking Zone

76. The applicant is proposing a 'car-lite' scheme with a proposed parking ratio of 0.17 car parking spaces per dwelling, based on 995 homes which equates to a total of 156 spaces (including Blue Badge). This is compliant with London Plan Policy T6.1 given both the current and proposed PTAL for this outer London site. Clarity should be provided on the ratio for each detailed and outline phase. Regarding the Blue Badge parking, the applicant is proposing 3% from the outset and an additional 2% if demand was to arise. It is noted that future occupants will have a permit to park on site, and details regarding reviewing

these permits should be provided. The quantum of car parking provided for the commercial element of the scheme appear acceptable.

77. The site is not within a Controlled Parking Zone (CPZ) at present given there was no need for the former hospital use to be subject to this. Given the proposed parking strategy, the applicant should work with Haringey Council to implement a suitable CPZ for this area to reduce any overspill parking and limit additional vehicle ownership and use. In addition, all future occupants of the site would be exempt from holding Council parking permits and this should be secured via the s106.
78. The application proposes 20% active and 80% passive provision for Electric Vehicle Charging Points (EVCPs). Whilst this is compliant with London Plan Policy T6 the applicant is encouraged to provide 100% active EVCP provision for all spaces.

Cycle parking

79. The applicant is committed to providing long and short-stay cycle parking in accordance with the London Plan and London Cycle Design Standards (LCDS) across the whole site, which is welcomed. However, it is requested that the applicant provides exact details to confirm compliance for the residential and commercial cycle parking with the LCDS. Details on short stay cycle parking locations should also be provided. Regarding the outline component, further information is requested on the expected layouts of the cycle parking. Clarification is required that the outline application area can accommodate at least London Plan Policy T5-compliant cycle parking spaces.

Trip generation and highway impact

80. The work carried out to explore the trip generation and highways impact is welcomed. However, the data provided requires amendments in order to fully understand the impact on the public transport and wider highways network. Further information has been provided in TfL's detailed comments to the Council.

Travel Planning

81. An outline Travel Plan, setting out a range of measures to encourage active and sustainable travel, has been submitted for the residential element of the wider masterplan. Officers note that several positive initiatives are included to boost active travel, but further targets should be provided. The applicant has not provided any information for the commercial travel part of the scheme. Details of travel planning measures and targets should be discussed further prior to Stage 2. The final Travel Plan should be secured within the s106 in accordance with London Plan Policy T4.

Servicing and Deliveries

82. A Delivery and Servicing Plan has been submitted. The management, overall level of servicing and locations are considered acceptable. However, the

applicant should provide information on delivery and servicing whilst the different phases are being built. The applicant should identify whether the areas would be marked or signposted. The final DSP should be secured by condition.

Construction

83. The applicant has provided an Outline Construction Logistics Plan (CLP) which gives construction details, including the expected number of trips, routing, working hours, and practices. Given the number of vehicle trips expected, it is requested that all trips are outside peak hours. In addition to this, further details are required, and these have been required in TfL's detailed comments to the Council. The final CLP should be secured by planning condition and TfL should be consulted prior to the commencement of any works.

Sustainable development

Energy strategy

84. The London Plan requires all major developments to meet a net-zero carbon target. Reductions in carbon emissions beyond Part L of the 2013 Building Regulations should be met on-site. Only where it is clearly demonstrated that the zero-carbon target cannot be fully achieved on site may a contribution to a carbon offset fund or reductions provided off site be considered.
85. An Energy Strategy (including Overheating Assessment) has been submitted with the application. The Energy Statement does not yet comply with London Plan Policies SI2, SI3 or SI4. The applicant is required to further refine the Energy Strategy and submit further information to fully comply with London Plan requirements. Full details have been provided to the Council and applicant in a technical memo that should be responded to in full, however outstanding policy requirements include: clarifications on the Be Lean carbon reductions for the detailed and outline components; further details to demonstrate the cooling hierarchy has been followed; demonstration that renewable energy has been maximised, including roof layouts showing the extent of PV provision and details of the proposed air source heat pumps; confirmation of compliance with this element of policy, with compliance to be secured within the S106 agreement; and further details on the heating strategy and on the design of future district heating network connection is required, the connection to the DHN must be secured by condition or obligation (see below).
86. For the domestic change of use part, the development is estimated to achieve a 76% reduction in CO2 emissions compared to 2013 Building Regulations. For the non-domestic new-build element, a 56% reduction is expected.
87. The development falls short of the net zero-carbon target in Policy SI2, although it meets the 35% reduction on site required by policy. As such, a carbon offset payment is required to be secured. This should be calculated based on a net-zero carbon target using the GLA's recommended carbon offset price (£95/tonne) or where a local price has been set, the borough's carbon offset price. This should be secured by planning obligation.

Energy infrastructure

88. The applicant has previously investigated the opportunity to connect to the Upper Lea Valley Energy from Waste district heating network via the Woodberry Down network. It has been confirmed that the Woodberry Down network does not have additional capacity to export heat to the proposed development and evidence of this correspondence has been submitted.
89. Instead, the applicant has been investigating a possible connection to the Haringey District Energy Network, which will be a key connection within a wider network connecting Edmonton Energy Recovery Facility in Enfield to developments in Haringey and Hackney. Where opportunities exist to connect to nearby existing or planned district heating networks, this should be the propriety for supplying heat to the development in accordance with the London Plan heating hierarchy. The Haringey DEN is at feasibility stage although there is a very strong commitment from Enfield, Haringey, and Hackney Councils to bring it forward and the project benefits from grant funding. Nevertheless, the applicant suggests there is insufficient certainty relating to the creation of the network until mid-2023, with Phase 1a of the proposed development proceeding earlier. As such, the current proposal is to provide a permanent on-site communal heat network for Phase 1a with connections to the DEN to be made in future phases if it becomes operational in that time.
90. The applicant has provided the latest note prepared in response to the Council in April 2022 on this matter. The note is not conclusive, and it is noted that the Council's position is still that Phase 1a's future connection to the network should be safeguarded with a temporary solution provided in the interim. Further correspondence and evidence of two-way communication with the Council should be provided as well as confirmation from the network operator that the network has capacity to serve the new development together with supporting estimates of the CO2 emission factor, installation costs, and timescales for connection. GLA officers' strong preference is also for Phase 1a to connect to the DEN in future and for a temporary solution in the meantime, unless a very strong justification can be presented for why this is not practically possible. The connection is to be secured through a suitable condition/ obligation.
91. The applicant is proposing three heat networks supplied by three energy centres for the different phases of the development. The applicant states that the number of energy centres has been kept to a minimum and energy centres for Phases 1b and 2 consolidated into one, and that it is not feasible to provide a single site-wide energy centre. Phasing is given as the main reason for this however it is unclear why more space cannot be allocated in the first phase to allow a site-wide energy centre in future. The size of the heat networks cannot be used as a reason for divergence from policy. GLA officers' strong preference is for a single site-wide heat network supplied by a centralised energy centre unless a very strong justification can be presented for why this is not practically possible.

Whole Life-Cycle Carbon

92. In line with London Plan Policy SI 2, the applicant has submitted a Whole Life-Cycle Carbon (WLC) Assessment. Detailed comments on the WLC Assessment are to follow directly to the applicant and Council.
93. The final Whole Life-Cycle Carbon Assessment that includes a completed GLA WLC Assessment template and follows the guidance in the LPG should be provided prior to Stage 2. Submission of a post-construction assessment, to report on the development's actual WLC emissions, should also be secured by condition.

Circular Economy

94. The applicant has submitted a Circular Economy Statement to support the application which is welcomed. The CE Statement is supported by an Operational Waste Management Plan, Site Water Management Plan, and Pre-Demolition Audit.
95. The current CE Statement references the consultation draft of the Circular Economy statements LPG, and therefore should be updated to reference the up-to-date requirements of the adopted version of the guidance (March 2022). The applicant has provided screenshots of the completed GLA Circular Economy template in Appendix C of the written report, demonstrating that it has been completed. This is welcome however it is requested that the applicant provides the completed template in the Excel format to the GLA for comment prior to Stage 2. In terms of the content of the document, the applicant must provide additional consideration in some areas and further information with respect to key metrics. Detailed comments have been provided to the council and the applicant in a technical note and should be responded to in full.
96. The Council should secure via condition the submission of a post-completion report setting out the predicted and actual performance against all numerical targets in the final Circular Economy Statement.

Water efficiency

97. The Sustainability Statement notes that the proposed dwellings will target a maximum indoor water consumption of 105 L/ person/ day, in line with the optional standard in Part G of the Building Regulations, and compliant with London Plan Policy SI 5. The Sustainability Statement notes that 3 Wat 01 credits are targeted for the non-residential uses on site, with water consumption reduced by 40%, also in line with Policy SI 5. Water efficient fittings, water meters, and a leak detection system are proposed, which is welcomed. Rainwater and greywater harvesting should also be included.
98. The proposed development generally meets the requirements of London Plan Policy SI5 but the applicant should also include detailed water harvesting and reuse proposals to reduce consumption of water across the site. This can be integrated with the surface water drainage system to provide dual benefit.

Digital connectivity

99. A planning condition should be secured requiring the submission of detailed plans demonstrating the provision of sufficient ducting space for full fibre connectivity infrastructure within the development in accordance with London Plan Policy SI6.

Environmental issues

Green infrastructure and urban greening

100. The proposed development presents a well-considered approach to the integrating of green infrastructure and urban greening. This includes the incorporation of green roofing and rain gardens, which support multifunctionality, in accordance with Policy G1 of the London Plan. The north-south green linkages (comprising both public private amenity space) between the SINC and Peace Garden is a positive addition, and it is encouraging this is secured within the Design Code.
101. The applicant has calculated the Urban Greening Factor (UGF) score of the proposed development as 0.42, which exceeds the target set by Policy G5 of the London Plan. As a hybrid scheme, it is important that the current quality and quantity of greening is secured through design codes and delivered through subsequent stages of planning. The UGF score of 0.42 should explicitly be written as a minimum within the Design Code and secured by condition. This should be enhanced where possible.

Biodiversity and nature conservation

102. In terms of biodiversity, London Plan Policy G6 states that proposals that create new or improved habitats that result in gains for biodiversity should be considered positively and that development proposals should aim to secure net biodiversity gain. The applicant has provided a Biodiversity Net Gain (BNG) report by London Wildlife Trust, which states that the proposals would achieve BNG of 12.2%. This is positive but the applicants are encouraged to treat this as a minimum and enhance it wherever possible.
103. The site lies partially within the 'St Ann's Hospital Wood' Site of Importance for Nature Conservation (SINC), identified as being of Local Importance which runs along the southern edge of the site adjacent to the railway embankment. This part of the site is also immediately adjacent to the 'Tottenham Railside' SINC, which includes the railway embankment itself, identified as being of Borough Importance.
104. In accordance with Part C of Policy G6 of the London Plan, the applicant should apply the following mitigation hierarchy to minimise development impacts: 1) avoid damaging the significant ecological features of the SINC; 2) minimise the overall spatial impacts and mitigate it by improving the quality or management of the rest of the site; and 3) deliver off-site compensation of better biodiversity value.
105. The potential impacts to the two SINC are considered in various documents including the Design and Access Statement, Design Code, Preliminary

Ecological Appraisal (PEA), and Strategic Ecology Report. The St Ann's Hospital Wood SINC has been considered as a fundamental part of the design, which is strongly welcomed. The woodland/ green area immediately adjacent to the SINC would be buffered from the new development by the landscaped areas around the blocks in Phases 1b and 2 which is positive. The new pathway forming the pedestrian/ cycle link to Warwick Gardens in the south west corner of the site has the potential to impact upon the SINC however this is a vital component of the scheme. The masterplan indicates that the SINC would effectively be fenced off from the pathway to manage access to it. Impacts upon the SINC from construction of the new path should be mitigated and managed as far as possible and mitigation secured by condition.

106. The recommendations and mitigation measures within the PEA and the Strategic Ecology Report should be followed and confirmed prior to Stage 2. A Construction Environment Management Plan, setting out how construction impacts will be avoided and mitigated, should be secured by condition.

Trees

107. The applicant has provided an Arboricultural Impact Assessment (AIA) which sets out that there are 226 individual trees and 32 groups of trees, and 7 hedges within influencing distance of the site. There is 1 Tree Preservation Order. The AIA states that, once proposed tree removal and replacement planting is considered, the proposals would result in a net reduction of c. 0.13 hectares of canopy cover by the time the new trees are mature. This is counter to the Mayor's London Environment Strategy target of increasing tree cover by 10% of current levels by 2050. Efforts to ensure the net tree canopy cover is not reduced should be explored and improved upon where possible.
108. The AIA also provides recommendations regarding any future reserved matters applications for the outline part of the scheme, including an Arboricultural Impact Assessment and Arboricultural Method Statement. This should be complied with. The applicant should provide a diverse range of proposed tree species in terms of biosecurity and also consider large-canopied trees to target urban heat island (UHI) effects and reduce the net loss of canopy cover within the proposals as they currently stand.

Flood risk

109. The site is within Flood Zone 1 but is greater than 1 hectare and within a Critical Drainage Area (CDA). A Flood Risk Assessment (FRA) has been submitted as required under the National Planning Policy Framework (NPPF). The FRA adequately assess the risk of flooding from fluvial/ tidal and pluvial sources, which is considered to be low. An assessment of sewer flood risk has not been provided and this is required.
110. The FRA states that groundwater monitoring found resting water levels as shallow as 0.85 below ground level which has the potential to impact upon below-ground features such as drainage/ SUDS and during construction. Appropriate groundwater control measures should be specified and secured by condition.

111. For the parts of the site located within the reservoir flood risk extents, the FRA recommends that building users/ residents seek refuge on the upper floors of the buildings and wait for advice from emergency services. The applicant must confirm whether the buildings in the affected area have internal access to upper floors, including communal areas where people can congregate. Further detail of the emergency planning and evacuation strategy should then be set out in a Flood Warning and Evacuation Plan (FWEP) secured by condition.
112. In conclusion the FRA provided does not yet comply with London Plan Policy SI 12 and further information is required in accordance with the above comments.

Sustainable drainage

113. The drainage strategy proposes to restrict runoff to the QBAR greenfield runoff rate for the 100-year event plus 40% climate change. This is supported in principle however the proposed impermeable area is stated to be 4.665 hectares including urban creep allowance, but the greenfield runoff rate has been calculated for 6.337 hectares. The greenfield runoff rate has therefore been over-estimated and should be revised to account for the proposed impermeable area only.
114. In terms of SuDS, the drainage strategy proposes green roofs, swales, an attenuation basin, tree pits, rain gardens, and permeable paving which is welcomed. The proposed detention basin is 1m deep. The applicant should confirm what provisions are included to manage the risk of groundwater ingress given the shallow groundwater found beneath the site. The drainage strategy states that rainwater harvesting has not been included at this stage but may be considered during detailed design; this is not considered to be acceptable for the detailed component. Rainwater harvesting proposals must be outlined at this stage to satisfy the requirements of London Plan Policy SI 13.
115. In conclusion the surface water drainage strategy for the proposed development generally complies with London Plan Policy SI 13, however some further information is required in accordance with the above comments.

Air quality

116. London Plan Policy SI 1 explains that to tackle poor air quality, protect health, and meet legal obligations development proposals must be at least Air Quality Neutral and major proposals must be supported by an Air Quality Assessment. Development proposals should use design solutions to prevent or minimise increased exposure to existing air pollution and make provision to address local problems of air quality.
117. Given the location of the proposed development in proximity to a number of human health receptors, construction dust mitigation relevant to a 'high risk' site, along with requirements for NRMM to comply with Low Emission Zone standards should be secured by condition in line with London Plan Policy SI 1 Part D. An assessment of the impacts from construction traffic emissions has not been carried out; this should either be carried out or further justification

129. **Affordable housing:** The development provides 60% affordable housing and is therefore eligible for the Fast-Track Route, subject to the necessary planning obligations regarding affordability and an Early-Stage Viability Review being secured.
130. **Urban design and heritage:** The proposals seek to optimise the development potential of the site and no strategic concerns are raised in respect of the layout, height, and massing of the development. Less than substantial harm to the character and appearance of the conservation area is identified but this is outweighed by the public benefits of the proposal.
131. **Transport:** Further details are required in relation to the impact of the development on bus infrastructure, highways works, car and cycle parking, trip generation, travel planning, servicing, and construction.
132. **Energy:** Further justification is required as to the proposals for heat and energy generation in accordance with the London Plan energy hierarchy, specifically regarding the connections to the future District Heating Network and the proposals for three separate energy centres to serve the development.
133. Further information is required on **sustainable development and environment**.

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

LOCAL REPRESENTATIONS:	Summary of Objection	Response
<p>393 RESPONSES</p> <p>389 IN OBJECTION</p> <p>4 IN SUPPORT</p>	<p><i>Material Planning Considerations</i></p> <p>Land Use</p> <ul style="list-style-type: none"> • Inappropriate non-residential uses • Lack of social and community infrastructure <p>Scale, Design and Heritage</p> <ul style="list-style-type: none"> • Overdevelopment of the site 	<ul style="list-style-type: none"> • There will be a range of non-residential uses within the development including workspace, including affordable workspace, a supermarket and other social and community uses. The exact range of uses is subject to further discussion between the applicant and the Council. Appropriate market testing closer to the date of provision is also required. Details would be secured through planning obligation. A substantial financial contribution will be secured through the community infrastructure levy towards community facilities and other local infrastructure. • Policy D3 of the London Plan requires developments to optimise site capacity with regard to good design and other considerations. In this case it is considered that the site is suitable for the size and scale of development proposed, as it has

	<ul style="list-style-type: none">• Excessive building height • Excessive density • Loss of local character	<p>been thoroughly assessed for its design quality including through four Quality Review Panels.</p> <ul style="list-style-type: none">• The building heights are taller in the centre of the site away from the lower scale surrounding built form. Building heights are no greater than three storeys in the most publicly visible locations, such as by St Ann's Road and Warwick Gardens. Residential amenity of existing homes and hospital buildings would be adequately protected. Local heritage would be appropriately respected and protected, and the design of the development is not out of keeping with the local character. • See response to 'overdevelopment' above. The development proposal optimises the capacity of the site to deliver much needed new housing and affordable housing. • The development has been reviewed by the Council's Design Officer and four Quality Review Panels who support its design. The new housing is provided in a contemporary style finished with materials and architectural detailing that reflects and respects local character. Key heritage features would be retained.
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	<ul style="list-style-type: none"> • Loss of heritage buildings and feature • Existing architects should be retained • Lack of boundary maintenance information • Loss of openness 	<ul style="list-style-type: none"> • Heritage features such as locally listed and non-designated heritage buildings, including the existing water tower, would be retained and re-used as part of this application. The boundary wall would be sensitively altered to improve visibility and access into the development and stitch it into the existing community. The Conservation Area would be suitably protected. The Council's Conservation Officer raises no objections to the development, given the wider benefits of this scheme balanced against the low level of less than substantial harm to the conservation area and their settings. • The existing architects will be retained through a planning obligation • The applicant will be responsible for general management and maintenance of the site. Details of general management and maintenance will be secured by condition. • The site is currently closed off by boundary walls on its northern and western sides which will be partially opened up by this proposal. The site is not currently a designated public open space or other specially protected area that is required to be protected in respect of its openness.
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	<p>Residential Amenity and Quality</p> <ul style="list-style-type: none"> • Loss of privacy • Loss of day/sunlight • Increased noise pollution • Negative impacts from construction work • Low quality homes 	<ul style="list-style-type: none"> • The separation distances between the proposed and existing properties is at least 20 metres in all cases. Upper floor balconies are also a common feature of residential neighbourhoods and as such any limited overlooking would not be excessive in the context of an urban residential neighbourhood as a result. • The day and sunlight reports submitted with the application show that there would be only a very limited loss of day/sunlight to neighbouring properties. • The proposed new neighbourhood would be predominantly residential and therefore not significantly noise creating. Non-residential uses would be located in the centre of the site, away from residential properties and the retained hospital. Noise and other disturbance from construction is a temporary nuisance that is controlled by non-planning legislation. • The new homes have been designed with input from the Council’s Design Officer and the Quality Review Panel from an early pre-application stage. All homes would meet relevant internal and amenity space standards, would have adequate internal light levels and most would be dual aspect.
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	<ul style="list-style-type: none"> • Unaffordable homes <p>Transport and Parking</p> <ul style="list-style-type: none"> • Lack of crossing over railway to south <ul style="list-style-type: none"> • Excessive parking • Insufficient parking • Loss of off-site car parking 	<p>Further analysis of the high residential quality of the development is provided in the committee report.</p> <ul style="list-style-type: none"> • The development would include 60% affordable housing across a range of tenures and affordability levels, as required by policy, in order to contribute towards a mixed and balanced local community. 32% of all homes would be provided in the low-cost London Affordable Rent tenure and half of these LAR homes are expected to be purchased by the Council and provided at Council rents. • The crossing over/under the railway to the south cannot be provided due to prohibitive cost and complexities of building over/under a busy railway line. The route would be safeguarded for provision in the future. • The development is required to provide parking on site for wheelchair users as a minimum. Residents of the 17% family homes on site, as well as residents who use vehicles for business purposes, are likely to require a parking space. Under-provision of parking where there is strong demand can lead to parking problems on site and in local streets. A restrained level of parking is provided which is compliant
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	<ul style="list-style-type: none"> • Increased traffic • Negative impact on transport infrastructure • Lack of public realm improvements Carbon Reduction, Sustainability and Pollution • Lack of microgeneration measures 	<p>with the London Plan Policy T6.1. Access to parking permits would be restricted which means existing off-site car parking would not be adversely affected.</p> <ul style="list-style-type: none"> • Increases in traffic from the development would be minor and not significant in the context of existing traffic levels. New crossings would be provided that would reduce vehicle speeds in the area and improve pedestrian safety. • The evidence submitted with this application shows that the impact on public transport would not be significant and the Council's Transportation Officer agrees with these findings. • There would be significant public realm improvements from the development including new crossings on St Ann's Road, a new connection to Warwick Gardens, and improved access points through the northern boundary wall through which the existing community can access the expanded Peace Gardens and other amenities on the site. • The development would include a significant number of photovoltaic panels which has been considered an acceptable
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	<ul style="list-style-type: none"> • Lack of carbon reduction measures • Negative impact on climate change • Increased air pollution Trees, Landscaping and Ecology • Excessive loss of trees and other foliage 	<p>amount of microgeneration by the Council's Climate Change Officer</p> <ul style="list-style-type: none"> • The development meets the minimum policy requirement of 35% reduction in carbon against 2013 Building Regulations. The residential parts of the development achieve a 76% carbon reduction which is a significant level of reduction and significantly above the minimum policy requirement. The remaining carbon would be offset through a financial contribution. • The development would meet the required planning policies with respect to carbon reduction, sustainability and other measures related to climate change. • The development would be at least air quality neutral. Any short-term increases in traffic and dust resulting from construction works would be temporary only. These matters would be mitigated where possible through construction and demolition management plans. • The loss of some trees on site is necessary to enable the development to be constructed. The trees being lost are primarily low-quality trees. A net increase
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	<ul style="list-style-type: none"> • Lack of wildlife conservation • Loss of existing ecology and biodiversity • Lack of ecological improvements <ul style="list-style-type: none"> • Insufficient green space <p>Other Considerations</p> <ul style="list-style-type: none"> • Loss of safety and security • Increased anti-social behaviour <ul style="list-style-type: none"> • Lack of surface water retention and mitigation 	<p>of 357 trees will occur on site. The Council's Tree Officer does not object to this application. Further information on this topic is provided in the committee report.</p> <ul style="list-style-type: none"> • The development would mostly retain the existing ecological zone to the south of the site and would significantly expand it further to the east. It would be protected during construction. There would be a biodiversity net gain on site once the development is constructed. • There is a significant net gain in open space and the development would meet the urban greening factor of 0.4 as required by Policy G5 of the London Plan. • The provision of new residential properties in the area would increase passive surveillance and thus safety and security. Measures, including potentially CCTV and number plate recognition, will be considered for the south-west link before it is opened for use. The Metropolitan Police has reviewed the application and raised no objections subject to conditions (Secured by Design) and planning obligations (Local Policing).
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		<ul style="list-style-type: none"> • The surface water drainage proposals for the development have been reviewed by the Council's Lead Local Flooding Officer and found to be acceptable.
	<p><i>Non-material considerations</i></p> <ul style="list-style-type: none"> • Reduction in property value • Information provided with the application is inaccurate or inappropriate • Inappropriate public consultation 	<ul style="list-style-type: none"> • Loss of property value is not a material planning consideration • The information provided is sufficient for the Council to make an informed judgement on this application • The applicant has undertaken several public consultation events and taken views into account where appropriate, as explained in the statement of community involvement submitted with this application

