

Appendix 1: Consultation Responses from internal and external agencies

Stakeholder	Comment	Response
Arboricultural Officer	<p>Response 22/12/2022</p> <p>I hold no initial concerns, from an arboricultural point of view to the above proposal.</p> <p>A tree survey, arboricultural impact assessment (AIA) has been carried out by Landmark Trees and is dated 29th July 2022. The report has been carried out to British Standard 5837 2012: Trees in relation to design, demolition and construction- Recommendations.</p> <p>I concur with much of the findings and statements including the tree quality classification. Four trees have been highlighted for removal to facilitate the development. These are T15, T17, T18, & T33. Three are low grade category C and one tree T33 Cypress tree is classed as category B (moderate quality).</p> <p>There is some encroachment into the root protection areas (RPAs) T31 Wild Cherry (category C) 12.7% and T32 Sycamore (category B) 1%. This is acceptable minimum encroachment.</p> <p>T22- T30 have existing hardstand within their root protection areas (RPAs). Any new hardstand will need to be permeable surface and no dig.</p> <p>Master Landscape Plans have been submitted with adequate tree planting to mitigate for the loss of the four trees We will require a species list, and a five-year aftercare plan to establish independence within the landscape and replace any losses. An on board Arboriculturist will need to be kept on board with the project until completion.</p> <p>I note several of the basement plans show encroachment into the RPA of the large mature London Plane street tree T26. This is not mentioned within the report.</p> <p>Until we have confirmation whether the RPA of T26 is compromised I must object to the proposal.</p> <p>The London Plane trees T26 & T27 will also require tree protection as this will be the access and egress for any future development.</p>	<p>Further detail for the RPA of T26 has been received and is considered acceptable, subject to conditions.</p>

	<p>Response 21/03/2023</p> <p>I concur with the statement below (<i>“In terms of the tree matter and specifically encroachment, our Arboriculturalist had originally calculated a 5% impact to the RPA of a healthy specimen of a robust species although the latest calculation slightly exceeds this at 6.04%. The impact is on disturbed ground and the other side of boundary wall foundations and so the impact should be rated as very low: the tree will not be compromised. The submitted report sets this out on page 16 and at para 6.1.7 which I hope is sufficient for your purposes”</i>). The species can take disturbance, and encroachment is minimum.</p> <p>There will be a need for replanting with an overall net gain of tree canopy. They have supplied a tree species list within the Arb report. This can be confirmed.</p>	
<p>Conservation</p>	<p>The development site includes two adjacent plots respectively located at Nos 44 and 46 Hampstead Lane, on the corner with Courtenay Avenue and on the southern boundary of the leafy and suburban Bishop’s part of Highgate Conservation Area that was historically the Bishop’s Wood, and later developed by the Ecclesiastical Commissioners from c.1900 to 1930 into a suburban area of large, detached houses set in mature gardens and surrounded by the ancient woodland.</p> <p>The original character of the Bishop’s area has substantially changed over the last decades due to the replacement of several original buildings with new houses of various scale, style and design quality which have complemented to varying degrees of success the original character of the area.</p> <p>This development site is surrounded by large green spaces such as the extensive Kenwood house parkland on the opposite side of the road within the London Borough of Camden and the generous playing fields of Highgate School flanking the development site along Courtenay Avenue.</p> <p>The Bishop’s area is still a high quality residential and largely landscaped development characterised by suburban villas of various age and style well set into their generous plots, with a prevailing original arts and crafts character in the area and in some cases designed by renowned architect CHB Quennel and his associates . The layout and spaciousness of the area, the significant gaps between houses that allow the enjoyment</p>	<p>Comments noted</p>

of incidental views into their generous gardens are key component of the special character of the Conservation Area.

Hampstead Lane is characterised as an historic ridge road with varying directions and gradient as a winding country lane flanked by a variety of houses with the development site prominently located in its western section that is characterised by large houses in substantial plots, large trees, and large green spaces.

Properties at Nos 44 and 46 are original yet much altered and unrefined late 1930s Arts and Crafts style houses erected by little known developers and of modest intrinsic architectural interest, low heritage value that provide a neutral contribution to the character and appearance of the Conservation Area. The application provides a comprehensive and detailed description of the historic evolution of the site that is corroborated by extensive archival evidence of the outline conformity of these houses to the prevailing original character without possessing any special architectural quality as demonstrated in the thorough assessment of the special interest and significance of these houses in the context of the Conservation Area.

The development site is prominently located along Hampstead Lane and Courtenay Avenue and forms integral part of the visual experience of this part of the Highgate Conservation Area. The siting, the proportions of existing and emerging buildings, together with their generous front and rear gardens, are the key, established, positive features of the Conservation Area to consider when assessing the proposed change on site and in the area. The development site is also largely screened by the dense and mature vegetation in views from any heritage asset within or around Kenwood Park whose leafy boundary along Hampstead Lane marks the inward-looking nature of the Kenwood estate despite its physical proximity to the Bishop's part of the Highgate Conservation Area.

The proposed scheme is for demolition of the houses at Nos 44-46 Hampstead Lane and erection of two linked three storey buildings with pitched roofs, basement level and further subterranean car park level; the above ground their storey buildings will be linked by a glazed structure visible along Hampstead lane. This new care home is to be erected on the unified sites at Nos 44-46 that are characterised by a down sloping topography to the rear of the sites along Courtenay Avenue, where the proposed residential basement level will be fully exposed in the proposed rear elevation as shown in the

submitted views along Courtenay Avenue. The loss of the neutral contributing buildings would cause no harm to the significance of the Conservation Area; however, the new development represents a change in terms of scale, architectural language and built presence on this corner of the conservation area. This neutrally contributing site can absorb a degree of change and change needs to conserve and complement the established features of the conservation area, hence the architectural expression of the proposed care home acknowledges and reinterprets the established, positive architectural features that define the prevailing built character of the area.

The proposal has been informed by a thorough understanding of the potential for re-development offered by the site and by the constraints imposed by the conservation area context.

The scale and proportions of the new development are indeed consistent with the progressive increase in built scale of this area, and very desirably retain the front and rear gardens with their amenity value as key features of the site and its area.

The proposed plan form is inspired by two houses connected by means of a link; this concept has been successfully inserted and developed within a generous site that still allows to express in a revisited, contemporary fashion the established relationship between buildings and their gardens.

The new scheme is elegantly contemporary yet complementary to the prevailing Arts and Crafts original character of the area and succeeds to express in an imaginative way the suburban, domestic character of the area through fluid, well-articulated masses, heights, traditional roof forms and materials. The new buildings are indeed characterised by red brick, an articulated and steeply pitched roofscape, an interesting and varied pattern of fenestration and semi dormers, a leafy boundary treatment, a well-integrated landscape scheme and a gently down-sloping rear elevation that connects with the rear garden.

The proposed care home, despite its scale, will blend in with the surrounding development in views along Hampstead Lane by virtue of its architectural expression and its affinity with the area character, landscape, and topography; the retention of the front garden and green boundary treatment, together with the mature trees along Hampstead Lane would substantially complement and mitigate the presence of the new development on that corner of the Conservation Area. The height of the proposed

	<p>development will not be significantly taller than the surrounding buildings and the new development will be located along the spacious Hampstead lane on the opposite side of the leafy and well screened northern boundary of the Kenwood House estate where the new development will have no impact on the significance of Kenwood House and its contributing setting.</p> <p>The generous rear garden, the established spatial and visual gap with No 1 Courtenay avenue and the carefully designed frontage along Courtenay Avenue will largely retain the established spatial relationship between buildings and between buildings and gardens where the rear elevation of the new Care Home will be experienced as part of the established residential environment along Courtenay Avenue in views from the playing fields of Highgate School.</p> <p>The harmoniously integrated architectural and landscape design, especially at the rear of the site, respect and take cues from the spatial and landscaped qualities that underpin and still legibly tie together this part of the Conservation Area.</p> <p>The site layout and plan form of the proposed scheme, the articulation of mass and height, the architectural expression, boundary treatment and landscape design altogether positively respond to the Conservation Area context, preserve the generous, now unified, rear garden feature, retain the established distance from property at No 1 Courtenay Avenue and the landscaped character of adjacent sites, and substantially help the new development to settle into its evolving heritage setting.</p> <p>The proposed scheme will not impact any important feature of any heritage asset, will instead add architectural and landscape quality to the site and will cause no harm to the Conservation Area, will conserve its significance and it is therefore supported from the conservation standpoint.</p>	
<p>Design</p>	<p><u>Site Location & Context</u></p> <p>The site is in the very far south-western corner of the Borough of Haringey; it faces Hampstead Lane, which forms the boundary with the Borough of Camden, with the boundary with the Borough of Barnet being one street, the width of a school playing field, to the west. It is therefore approximately mid-way between the centres of the two iconic hill-top, North London suburban “villages” of Highgate and Hampstead.</p>	<p>Comments noted</p>

However, this application site effectively forms the south-western corner of a large area of detached houses of consistent character, known as The Bishops. This is a residential site, containing two existing large detached houses, with further large detached houses adjacent to its east on Hampstead Lane and north along Courtenay Avenue, and continuing for the whole of Courtenay Avenue and eastwards along the north side of Hampstead Lane for several blocks. But the whole of the south side of Hampstead Lane is of very different character, mostly consisting of densely wooded, walled estates, including the Kenwood Estate directly opposite, where the only visible structures are high walls, gates and occasional lodges, interspersed with entrances to the vast public parkland of Hampstead Heath beyond. Meanwhile, the next property west on the north side of Hampstead Lane, occupying the opposite corner of Courtenay Avenue and for the whole of the next block, is a school playing field, belonging to private Highgate School, with the next street east being The Bishops Avenue, notorious for its 'millionaires' and oligarchs' mansions. The site can therefore be seen as being at the junction of three distinctly different character areas.

The site is within Haringey's Highgate Conservation Area, which included the whole of Courtenay Avenue and the whole of Hampstead Lane within the borough and the whole of Courtenay Avenue. Bishops Avenue and the north side of Hampstead Lane is contained within Barnet Council's Hampstead Garden Suburb Conservation Area, whilst Kenwood House, including its grounds, wall and lodges, are Statutory Listed. The Conservation Area will provide detailed heritage and building conservation comments but suffice it to say the principle of demolition and the quality of design of the proposed replacement are considered to meet the necessary conservation tests. The playing fields opposite, along with The Heath & the estates on the south side of Hampstead Lane, are designated Metropolitan Open Lane (MOL), which protects the openness of surroundings as well as uses of the designated area; this will be discussed in further detail under .

The ground slopes steeply to the north, down Courtenay Avenue, dropping about 5m across the width of the site, whilst it levels off quickly just south of Hampstead Lane, before falling steeply towards central London, albeit that this view is completely hidden here by the densely wooded Kenwood grounds. The site is not a Site Allocation, and there is no other policy designation on the site. The playing fields are part of Site Allocation SA41 which covers all of the Highgate School estate and has led to the writing and adoption of the Highgate School SPD, which controls development of the school

estate, but does not affect neighbouring sites such as this one. There is, therefore, no masterplanning requirement for this site.

Streetscape Character & Pattern of Development

The proposals retain the existing streetscape character of individual large houses, sitting in their own front, side and rear gardens, whilst scaling that up. This is considered appropriate in urban design terms, reflecting the corner site and main street frontage whilst respecting the strongly prevailing character of individual houses, by treating the building architecturally as two separate buildings with a light weight, transparent link (on which, more detail under Materials & Detailing below).

Front gardens with gates & trees are retained in this development. These will be predominantly soft landscaped, albeit with vehicular driveways for both houses and parking for seven cars. The front garden wall will be a key detail to get right to ensure the development is well integrated into its context. Whilst tall gates and fences have become the norm, and tall solid walls and fences are becoming more and more common in this neighbourhood, garden walls or fences were originally of modest height, to allow an eye-level view of the front of the house, including to its front door, and this would be by far preferable.

Both “houses” will clearly address the street, with plentiful windows facing both street frontages. Clearly visible front doors to both “houses”, with distinct, different purposes, mark and anchor each “house”. Around the Courtenay Avenue side, as the land falls away steeply, the lower ground floor will emerge, with a row of bedroom windows below entrance level emerging from a wide, level bottomed lightwell with sloped sides, from one floor below ground floor at the front to ground level at the rear. A wide gap between the rear of the proposed building and the first house on Courtenay Avenue will maintain a sense of hierarchy between the more important Hampstead Lane and the less important Courtenay. This gap is partially closed at what is by then the ground level (effectively below lower ground floor within the building), with two small single storey structures for services.

Form, Bulk, Height, and Massing

Additional height represents a modest increase on existing, including disguising the lower ground floor so that the prevailing appearance of the proposal from the front will be of a pair of large, two to three storey houses (the third storey being half in the roof). Such an increase in height is appropriate to the location, in urban design terms, as it is: on a major street (Hampstead Lane), at a street corner (of Courtenay Avenue with Hampstead Lane), opposite the large open space of the school playing fields to its immediate west, and opposite the densely wooded walled estate of Kenwood, from which neither the house nor any of its many open spaces are visible. It can also be seen as more appropriate to this proposed use as an institutional old peoples home for it to be made up of two slightly larger buildings than even the large single family houses of the streets to the north and east.

The large sweeping pitched roof form, made up of steeply pitched roofs broken up with gabled bays and dormer windows, is a strong and important part of how the proposal represents a contemporary reinterpretation of the Arts & Crafts style that is so prevalent in the Bishops area to the north and east of the site, as well as in the Garden Suburb area not far to the west, and is recognised as being such an important aspect of this part of the Conservation Area. Further elements that have been contemporarily reinterpreted include; asymmetrically breaking up of what would otherwise be a simple pitched form with gabled projecting bays, the insertion of tall brick chimneys and wide pitched dormers, asymmetrical windows within bays and facades, and strongly expressed front doors with decorative surrounds.

From the Courtenay Avenue side, and even more so from the rear, as the land falls away, the proposal inevitably takes on the appearance of a larger, taller building, as the lower ground floor appears from the sloping ground. The side elevation mitigates this by dropping the roof lower to the rear over the very short projecting wing to the Courtenay side and into this corner of the building proper. The rear will not be much visible from the public realm; Courtenay Avenue itself is a private road, gated close to its junction with Hampstead Lane, with concierge controlled access, and much of the rear will only be visible, if at all, from private back gardens, and at some distance, the private golf course far beyond, but the large numbers of large mature trees in this and other back gardens and along Courtenay Avenue will probably further hide it. Nevertheless, the slightly recessed central portion of the rear elevation is designed as a series of terraces and balconies, with the potential for balcony and trellis planting to further hide the building.

The form bulk and massing of the proposal breaks down its size in a number of ways including; the main (upper) ground level, where the entrances are, is set low to the ground level, itself well below street level on Hampstead Lane, design as two separate “houses”, linked only at ground floor and below, or at upper floors by only a light weight link (on which, more detail under Materials & Detailing below), breaking up the facades into several back and forward projecting bays, and that the second floor is contained within the roof, with their bedrooms and communal rooms lit by full and semi-dormer windows and windows in gables of bays.

The size, height, bulk, and massing of the proposal is unavoidably larger than the two existing houses, but only represents a modest increase, which can be considered reasonable considering the location., setting and different use, as well as being well disguised in an ingenious design, a contemporary reinterpretation of Arts & Crafts that balances referencing the context, breaking down the height and bulk and honestly expressing the contemporary, specialist residential function.

Elevational Treatment, Fenestration, Balconies, Materials & Detailing

This contemporary reinterpretation of Arts & Crafts is composed in a balanced, asymmetrical manner, made up of two “house” sections defined by their encompassing roofs, modified by asymmetrical gabled projecting bays, containing asymmetrical arrays of large, vertically proportioned windows. Window reveals will be deep to increase the weight and quality of the elevations, whilst dormer window surrounds are appropriately as light and slender as possible. Detailing of cills, lintels, dormer surrounds, eaves, verges, chimneys, main front door surrounds and decorative brick panels are simple and elegant but provide sufficient enlivening and decoration to raise these design features and compliment the overall composition.

The predominantly brick based architecture comes with an appropriate promise to choose good quality dark red, variegated multi-stock brickwork, to be confirmed in conditions. Roofs are proposed to be in bronze standing seam metal, of a similar colour to traditional clay tiles but more contemporary and with a simpler, smoother rhythm and pattern of parts, a contemporary reinterpretation of traditional construction. Similar bronze finishes will be used on metalwork such as window frames, dormer surrounds and where solid panels are inserted into windows, but each with subtly different colour,

reflectivity and therefore appearance. All will be subject to condition to protect quality and appropriate appearance.

The rear elevation only features balconies; as noted above looking onto a wooded landscape as the land falls away into the valley to the north where Highgate Golf Course sits. Chunky timber loggia detailing to those balconies that project, and glass balustrades within chunky timber frames and handrails, will provide light and views, especially important as many residents will be sitting or bed-bound, whilst providing a robust appearance that references the firm, simple garden structures of Arts & Crafts in a frankly contemporary manner. Given that the rear elevation will be barely visible from neighbours and probably completely invisible from any part of public realm, and that these residents are particularly unlikely to clutter their balconies, there is very little chance of the usual concerns at glass balustrades to residential balconies being relevant here.

The light weight link between the two “houses” at 2nd & 3rd floors is also to be detailed in chunky, robust timber framing with plain clear glass between. This also references Arts & Crafts garden features and secondary structures such as loggias and canopies, but more importantly giving it a good chance of appearing almost invisible. The link is carefully design to prevent clutter and light spillage (including recessed electric lighting), to ensure it will appear from outside to be transparent by day and dark by night.

External terraces and balconies to rear are designed to provide a bright, light weight outlook and provide views for residents, who are particularly likely to be sitting and /or bed-bound, so are generally given glass balustrades. But maximised vegetation to minimise impression of an over-large building when viewed from the rear, notwithstanding that all or almost all views of the rear of this proposal will be from within private gardens or the private, gated street of Courtenay Avenue.

Residential Quality

Although there are no adopted planning standards for older persons’ residential accommodation, the standard of accommodation proposed appears to be superb, with spacious bedrooms and plentiful, varied and attractively designed communal accommodation. Officers are confident that the care and detailed attention shown by the applicants into the design of bedrooms and communal facilities, all areas have been

designed to promote dignified living standards for the frail, elderly, and those suffering with dementia.

Bedrooms are generally single aspect, as is to be expected, facing north, west and south. The large number of trees to the southern front gardens and to the woodlands on the opposite side of Hampstead lane mean there is significantly reduced danger of overheating due to solar gain, whilst the north facing bedrooms will benefit from great sunny views across the steeply falling, predominantly wooded landscape of the houses along Courtenay Avenue, their generally large, wooded back gardens, and the Highgate Golf Course quite some distance away beyond.

Daylight, Sunlight, Privacy & Outlook

Of relevance to this section, Haringey policy in the DM DPD DM1 requires that:

“...D Development proposals must ensure a high standard of privacy and amenity for the development’s users and neighbours. The council will support proposals that:

- a. Provide appropriate sunlight, daylight and open aspects (including private amenity spaces where required) to all parts of the development and adjacent buildings and land;
- b. Provide an appropriate amount of privacy to their residents and neighbouring properties to avoid overlooking and loss of privacy detrimental to the amenity of neighbouring residents and residents of the development...”

The applicants provided Daylight and Sunlight Report on their proposals and of the effect of their proposals on neighbouring dwellings. These have been prepared fully in accordance with council policy following the methods explained in the Building Research Establishment’s publication “Site Layout Planning for Daylight and Sunlight – A Guide to Good Practice” (2nd Edition, Littlefair, 2011), known as “The BRE Guide”.

The assessment finds that the day and sunlight received by all neighbouring properties would largely meet the BRE recommended guidance. The few locations that do not quite meet the recommended levels consist of two ground floor flank windows in no. 42 Hampstead Lane, close to the boundary with the application site. These windows are believed to light a living room which also has large windows to the front and back, and as such is expected to retain good levels of illumination and daylight distribution.

	<p>The applicants' assessment also finds the proposals would achieve excellent levels of day and sunlight at or above the BRE Guide recommended levels.</p> <p>In the case of higher density developments, it would normally be noted that the BRE Guide itself states that it is written with low density, suburban patterns of development in mind and should not be slavishly applied to more urban locations; as in London, the Mayor of London's Housing SPG acknowledges. Therefore, full or near full compliance with the BRE Guide is not to be expected and the fact that it is wholly achieved here is considered an exceptional performance, albeit that it recognises this is one of the more suburban parts of the borough.</p> <p>The proposals are well set back from or turn to face away from boundaries to the neighbouring existing residential dwellings at 42 Hampstead Lane and 1 Courtenay Avenue. There is no expectation of any overlooking or loss of privacy concerns to either property.</p> <p><u>Conclusions</u></p> <p>This proposed development is to provide a much-needed form of specialist accommodation in a part of the borough that is not particularly well connected but nevertheless highly desirable, as reflects the exceptional quality of the predominantly green, wooded landscaped setting and being on the edge of the huge and beautifully landscaped public open spaces of Hampstead Heath. The proposal is just in a Conservation Area, but respects the form, pattern and style of that Conservation Area in a contemporary reinterpretation of Arts & Crafts that balances referencing the context, breaking down the height and bulk and honestly expressing the contemporary, specialist residential function. Height, bulk, and massing is unavoidably larger than the two existing houses, but only represents a modest increase, which can be considered reasonable considering the location., setting and different use, as well as being well disguised in an ingenious design. With a promise of high quality materials and detailing, this proposal has the potential to be an excellent addition to the architectural heritage of the borough, neighbourhood and this special location.</p>	
Ecology	Ecology Reports (Ecology Ecological Impact Assessment, Ecology Addendum and information collated in Bat Assessment Report) for the Proposed Development,	Conditions 1 – 3 have been suitably

	<p>comprising a desk study search for baseline information on designated sites, habitats and protected species. Site visits and Habitat Surveys collectively seeking preliminary avoidance, mitigation and compensation measures for vegetation, trees, continued roosting opportunities for bats, ecological enhancement opportunities measures and Biodiversity Net Gain are also referenced. All have been prepared to current good practice guidance covering relevant legislation and policy.</p> <p><u>Conclusion:</u> The development seeks to enhance ecological features and the proposed mitigation and enhancement measures are satisfactory. The mitigation measure within these reports should be secured by condition as follows;</p> <ol style="list-style-type: none"> 1. <u>Breeding Birds:</u> It is recommended that vegetation removal and demolition of 44-46 Hampstead Lane take place between September and mid- March to avoid the breeding bird season. If this timeframe is not feasible, a suitably qualified ecologist will carry out a pre-work site visit to ensure there are no active nests. Reason: To prevent disturbance of nesting birds 2. <u>Bats:</u> Prior to the demolition of both buildings which have been identified as providing low potential to support roosting bats, a toolbox talk to all contractors onsite will be carried out by a suitably qualified bat licenced ecologist. 3. <u>Lighting:</u> Lighting strategy to inform the mitigation of light pollution/spill. Outdoor lighting will aim to have as little light spill as possible, with light spread near to or below the horizontal; use light sources that emit minimum ultra-violet light to avoid attracting large numbers of insects; be as low-level and directional as possible; and be the minimal level required for health and safety. Reason: To prevent increase light spill on surrounding habitat & trees and to reduce permanent disturbance to foraging or commuting bats. 4. Between April and September works should not commence until at least 1 hour after dawn and should finish at least 1 hour before sunset and no lighting at night during construction will be proposed. Reason: To avoid causing disturbance to foraging and commuting bats, using the surrounding habits. 	<p>re-worded and included.</p> <p>Hours of construction are detailed as an informative and officers are satisfies that the standard hours of construction would not breach the parameters referred to in suggested condition 4.</p> <p>Compensatory measures for biodiversity net gain will form, part of landscaping condition, as per the suggested condition 5.</p>
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NHS (Haringey)	<p>There is significant evidence that older residents of care homes including those with dementia have a greater incidence of unplanned admissions to hospital and will require significant support from a range of health services.</p> <p>I understand that Malcolm Souch provided a figure of £236,700 for mitigation. The HUDU Model is updated regularly (typically annually) and having re-run the figures the overall figure is £304,567. This is assuming that not all the residents will be new to the area and that a new household will not necessarily move into their former homes with an overall additional 45 residents in the area. We note that the applicants are providing a flexible space on-site space for health care use but that how this is to be used may still to be agreed. If no-one has come back to you regarding how this is used, then I hope colleagues will do this next week. There are also additional revenue costs which are not being sought by the NHS from the developer but awareness that this is a cost to the NHS is important.</p> <p>Taking the various factors into account we request that the Council secures a contribution of £152,283 within the S106 agreement towards the expansion of health capacity within the area to meet the needs of the care home residents. This will be through the local Primary Care Network and NHS Trusts on the basis of the high incidence of unplanned hospital admissions of residents of this age and with complex health needs. I attach graphs illustrating the higher incidence of admissions of older people and GP/ nurse consultation rates. While this information is from Bexley the pattern is similar across London. The residents due to their health conditions are particularly vulnerable and it is important that the NHS is able to increase capacity to meet their needs. This approach has been supported by Inspectors at appeal, most recently in January this year for the proposed Danson Road Care Home, Bexley.</p>	Noted and included as a S106 obligation
Public Health	With regards to the pre-apps meetings attended with the developer. I am happy to see they have made changes made to our comments regarding design of the internals and outdoor space for their residents, however, to be sure they comply fully with dementia	A condition is attached regarding Stirling Design Accreditation. The

	<p>friendly design standards I would like to see that they have Contacted Stirling University to achieve DSDC accreditation.</p> <ul style="list-style-type: none"> • I would also like to see evidence that they have spoken to ICB to look especially at GP and NHS cover. We are satisfied that this can be covered in the medical management plan with private arrangement. • I also need to be satisfied that they there are no long-term financial implications on council (responding to incidents) If this can be covered by a financial contribution, as previously discussed then this should suffice. • They need to demonstrate they have implemented the guidance for dental care at the care home. A plan was previously sent in this regard, we just need to see they have plans to fulfil this. 	<p>internal layout is considered acceptable and more detail can achieve this.</p> <p>Provision of a private medical plan is attached as s106 obligation, as has financial contribution for NHS.</p>
<p>Pollution</p>	<p>Having considered all the relevant supportive information especially the Energy & Sustainability Statement dated 6th September 2022, Air Quality Assessment report with reference J10/12544A/10/1/F6 prepared by Air Quality Consultants Ltd dated September 2022 taken note of sections 9 (Mitigation) and 10 (Conclusions) as well as the Desk Study and Basement Impact Assessment Report with reference J21167A Rev. 0 prepared by GEA Limited dated December 2021 taken note of section 5.1 (Made Ground) that testing on four samples of the made ground have been analysed for a range of contaminants as a precautionary measure but this work is currently in hand and an updated version of this report will be issued upon completion of this testing, please be advise that we have no objection to the proposed development in respect to air quality and land contamination but the following planning conditions and informative are recommend should planning permission be granted.</p> <p>Whilst the applicant seems to have provided further information on the proposed life-safety generator, for emergency purposes only, we would still need to know the number of times the generator will be in use monthly or annually as well as the likely stack height in relation to the proposed buildings so that we can make an inform decision about the generator safety emission as submitted in section 1.6 of the AQ Assessment report with reference J10/12544A/10/1/F6 prepared by Air Quality Consultants Ltd dated September 2022. The current information submitted in the report is not sufficient for us to do this.</p> <p><u>1. Land Contamination:</u></p>	<p>Suitable conditions and Informative will be applied</p>

Before development commences other than for investigative work:

- a. Using the information already submitted in the Desk Study and Basement Impact Assessment Report with reference J21167A Rev. 0 prepared by GEA Limited dated December 2021, chemical analyses on samples of the near surface soil in order to determine whether any contaminants are present and to provide an assessment of classification for waste disposal purposes shall be conducted. The site investigation must be comprehensive enough to enable; a risk assessment to be undertaken, refinement of the Conceptual Model, and the development of a Method Statement detailing any additional remediation requirements where necessary.
- b. The risk assessment and refined Conceptual Model shall be submitted, along with the site investigation report, to the Local Planning Authority which shall be submitted to, and approved in writing by, the Local Planning Authority prior to that remediation being carried out on site.
- c. Where remediation of contamination on the site is required, completion of the remediation detailed in the method statement shall be carried out and;
- d. A report that provides verification that the required works have been carried out, shall be submitted to, and approved in writing by the Local Planning Authority before the development is occupied.

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

2. Unexpected Contamination:
If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until a remediation strategy detailing how this contamination will be dealt with has been submitted to and approved in writing by the Local Planning Authority. The remediation strategy shall be implemented as approved.
Reasons: To ensure that the development is not put at unacceptable risk from, or adversely affected by, unacceptable levels water pollution from previously unidentified contamination sources at the development site in line with paragraph 109 of the National Planning Policy Framework.

3. NRMM:

a. No works shall commence on the site until all plant and machinery to be used at the demolition and construction phases have been submitted to, and approved in writing by, the Local Planning Authority. Evidence is required to meet Stage IIIB of EU Directive 97/68/ EC for both NOx and PM. No works shall be carried out on site until all Non-Road Mobile Machinery (NRMM) and plant to be used on the site of net power between 37kW and 560 kW has been registered at <http://nrmm.london/>. Proof of registration must be submitted to the Local Planning Authority prior to the commencement of any works on site.

b. An inventory of all NRMM must be kept on site during the course of the demolitions, site preparation and construction phases. All machinery should be regularly serviced and service logs kept on site for inspection. Records should be kept on site which details proof of emission limits for all equipment. This documentation should be made available to local authority officers as required until development completion.

Reason: To protect local air quality and comply with Policy 7.14 of the London Plan and the GLA NRMM LEZ

4. Demolition/Construction Environmental Management Plans:

a. Demolition works shall not commence within the development until a Demolition Environmental Management Plan (DEMP) has been submitted to and approved in writing by the local planning authority whilst

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

The following applies to both Parts a and b above:

- a) The DEMP/CEMP shall include a Construction Logistics Plan (CLP) and Air Quality and Dust Management Plan (AQDMP).
- b) The DEMP/CEMP shall provide details of how demolition/construction works are to be undertaken respectively and shall include:

	<p>i. A construction method statement which identifies the stages and details how works will be undertaken;</p> <p>ii. Details of working hours, which unless otherwise agreed with the Local Planning Authority shall be limited to 08.00 to 18.00 Monday to Friday and 08.00 to 13.00 on Saturdays;</p> <p>iii. Details of plant and machinery to be used during demolition/construction works;</p> <p>iv. Details of an Unexploded Ordnance Survey;</p> <p>v. Details of the waste management strategy;</p> <p>vi. Details of community engagement arrangements;</p> <p>vii. Details of any acoustic hoarding;</p> <p>viii. A temporary drainage strategy and performance specification to control surface water runoff and Pollution Prevention Plan (in accordance with Environment Agency guidance);</p> <p>ix. Details of external lighting; and,</p> <p>x. Details of any other standard environmental management and control measures to be implemented.</p> <p>The development shall be carried out in accordance with the approved details. Additionally, the site or Contractor Company must be registered with the Considerate Constructors Scheme. Proof of registration must be sent to the Local Planning Authority prior to any works being carried out.</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><u>Informative:</u></p> <p>1. Prior to demolition or any construction work of the existing buildings, an asbestos survey should be carried out to identify the location and type of asbestos containing materials. Any asbestos containing materials must be removed and disposed of in accordance with the correct procedure prior to any demolition or construction works carried out.</p>	
<p>Refuse Management</p>	<p>I have looked at the documents (Design and Access Statement, Transport statement and Service statement) and noted that waste will be separated into recycling, refuse, food waste and clinical waste and that collections of all material streams, will be provided by a private contractor. The waste will be stored and moved to a collection point within the property and the logistics of this will be managed by on site staff. As long as the</p>	<p>Noted and informative added.</p>

	<p>waste contractor used is a licenced waste carrier and complies with the waste duty of care code of practice, there is no impact on Haringey.</p> <p>I couldn't see any details about container sizes, quantities and who would be providing those but in case of interest details about the waste and recycling containers and services Haringey provides can be found at https://www.haringey.gov.uk/environment-and-waste/refuse-and-recycling</p>	
Sustainable drainage (SuDS)	<p>After reviewing the Flood Risk Assessment and SuDS report reference number C2823 – R1 – REV – A along with all the Appendices as prepared by Nimbus Engineering Consultant, we have no comments to make on the above application. We are content with the submission and if the proposed scheme is constructed and maintained as per the attached Flood Risk Assessment and SuDS report, we are satisfied that the impact of surface water drainage have been addressed adequately.</p>	<p>These are noted and included in condition regarding SuDS.</p>
Sustainability	<p>Carbon Management Response 17/03/2023</p> <p>In preparing this consultation response, we have reviewed:</p> <ul style="list-style-type: none"> • Energy and Sustainability Statement prepared by PHP Engineering Services Solutions Ltd (dated 6 Sep 2022) • Biodiversity Net Gain report prepared by eight versa (dated 14 Oct 2022) • Relevant supporting documents. <p>1. Summary</p> <p>The development achieves a reduction of 37% carbon dioxide emissions on site against Part L2021, which is acceptable in principle. However further information and clarifications need to be provided to overcome concerns over the overheating assessment and mitigation strategy, and overall sustainability strategy. Appropriate planning conditions will be recommended once this information has been provided.</p> <p>2. Energy – Overall</p> <p>Policy SP4 of the Local Plan Strategic Policies, requires all new development to be zero carbon (i.e. a 100% improvement beyond Part L (2021)). The London Plan (2021) further confirms this in Policy SI2.</p>	<p>S106 obligation and relevant conditions attached.</p>

The overall predicted reduction in CO₂ emissions for the development shows a site-wide improvement of approximately 37% in carbon emissions with SAP10.2 carbon factors, from the Baseline development model (which is Part L 2021 compliant). This represents an annual saving of approximately 13 tonnes of CO₂ from a baseline of 35.2 tCO₂/year.

Please note that in comparison to the original application under ref. HGY/2021/2703, that scheme achieved a 58% reduction in on-site regulated emissions, but this was compared to a Part L 2013 baseline with SAP10 carbon factors instead. Since the introduction of Part L in June 2022, the calculations are undertaken differently so the two results cannot easily be compared in their overall carbon reduction.

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: 21.6 tCO₂.

<i>Non-residential (SAP10.2 emission factors)</i>			
	Total regulated emissions (Tonnes CO₂ / year)	CO₂ savings (Tonnes CO₂ / year)	Percentage savings (%)
Part L 2021 baseline	35.2		
Be Lean	29.5	5.7	16%
Be Clean	29.5	0.0	0%
Be Green	22.2	7.3	21%
Cumulative savings		13	37%
Carbon shortfall to offset (tCO₂)	22.2		
Carbon offset contribution	£95 x 30 years x 22.2 tCO ₂ /year = £63,270		
10% management fee	£6,327		
Total	£69,597		

Action:

- The proposed percentage carbon reduction by renewable sources in the executive summary p.2 does not correspond with the percentage reported later in the report. Please amend.
- What is the calculated Energy Use Intensity? How does this perform against GLA benchmarks for a similar use, i.e. hotels at 55 kWh/m²/year? The applicant also needs to set out how this has been calculated.
- What is the calculated Primary Energy Factor?
- Please submit the updated GLA Carbon Emission Spreadsheet for Part L 2021 to demonstrate that the solar PV generation has been appropriately reflected in the above energy hierarchy.

Energy – Lean

The applicant has proposed a saving of 5.7 tCO₂ in carbon emissions (16%) through improved energy efficiency standards in key elements of the build, based on SAP10.2 carbon factors. This meets the minimum 15% reduction set in London Plan Policy SI2 for non-residential developments, so this is acceptable.

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

Floor u-value	0.11 W/m ² K
External wall u-value	0.16 W/m ² K
Roof u-value	0.13 W/m ² K
Window u-value	1.20 W/m ² K
G-value	0.40
Air permeability rate	3 m ³ /hm ² @ 50Pa
Ventilation Strategy	MVHR with individual units with >80% efficiency heat recovery and 0.5 W/l/s Specific Fan power
Space cooling	VRF system with SEER of 4.92
Thermal Bridging	Psi-values compliant with accredited details. Window lintels to be keystone Hi Therm lintels or equivalent with a psi-value of 0.05 W/mK
Low energy lighting	Average 110 lm/cW
Heating system (Be Lean scenario)	Heat pump wit SCoP of 2.64

Space heating requirement	4.22 kWh/m ² /year
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Actions:

- Which spaces will be cooled? Please annotate this clearly on floorplans, or excerpts of the floorplans with annotations within the Energy report.
- Please identify on a plan where the MVHR units will be located within the studios. The units should be less than 2m away from external walls.
- How is lighting energy demand improved? Should consider daylight control and occupancy sensors for communal areas.
- What is the proportion of glazed area? Consider bringing this down to 10-20% (north), 10-15% (east + west), 20-25% south.
- Provide the average space heating requirement in kWh/m²/year. New buildings should meet the 15 kWh/m²/year target. The applicant also needs to set out how this has been calculated.

Overheating is dealt with in more detail below.

Energy – Clean

The applicant is not proposing any Be Clean measures. The site is not within reasonable distance of a proposed Decentralised Energy Network (DEN). A Combined Heat and Power (CHP) plant would not be appropriate for this site.

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.

The application has reviewed the installation of various renewable energy technologies. The report concludes that air source heat pumps (ASHPs) and solar photovoltaic (PV) panels are the most viable options to deliver the Be Green requirement. A total of 7.3 tCO₂/year (21%) reduction of emissions are proposed under Be Green measures.

The total solar array peak output would be 24 kWp. The 60 panels of 400W would be installed horizontally or at a low angle of 10° or less on the flat roof areas.

The communal air-to-water ASHP systems (min. SCOP of 3.99) will provide space heating to the habitable rooms through wet underfloor heating, as well as hot water generation and space cooling (SEER 4.92).

Actions:

- What is the roof area that will be covered by solar PV?
- How will the solar energy be used on site (before surplus is exported onto the grid)?
- A living roof should be installed under the solar PV, or if this is not feasible, the roof should be light coloured to reduce solar heat gains and the improve efficiency of the solar panels.
- How much of the heating/hot water demand will be met by the proposed types of heat pumps? If this cannot be met fully, how will this be supplemented?
- How will the ASHP units be mitigated in terms of visual and noise impact?

Energy – Be Seen

London Plan Policy SI2 requests all developments to ‘be seen’, to monitor, verify and report on energy performance. The GLA requires all major development proposals to report on their modelled and measured operational energy performance. This will improve transparency on energy usage on sites, reduce the performance gap between modelled and measured energy use, and provide the applicant, building managers and occupants clarity on the performance of the building, equipment, and renewable energy technologies.

- Please set out what the broad metering strategy will be for this development.
- What are the unregulated emissions and proposed demand-side response to reducing energy: smart grids, smart meters, battery storage?
- Demonstrate that the planning stage energy performance data has been submitted to the GLA webform for this development: (<https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance/be-seen-energy-monitoring-guidance/be-seen-planning-stage-webform>)

3. Carbon Offset Contribution

A carbon shortfall of 22.2 tCO₂/year remains. The remaining carbon emissions will need to be offset at £95/tCO₂ over 30 years.

4. Overheating

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

In accordance with the Energy Assessment Guidance, the applicant has undertaken a dynamic thermal modelling assessment in line with CIBSE TM59 with TM49 weather files and the cooling hierarchy has been followed in the design. The report has modelled a sample of the worst case 4 top floor bedroom units/studios, and 1 dining lounge. No hallways have been modelled.

Results are listed in the table below.

	TM59 – criterion A (<3% hours of overheating)	TM59 – criterion B (hours >26°C <33 hours)	% of habitable rooms pass	% of spaces pass
DSY1 2020s	0/5	0/5	0	0
DSY2 2020s	Not modelled.			
DSY3 2020s	Not modelled.			
DSY1 2050s	Not modelled.			
DSY1 2080s	Not modelled.			
Total number of areas modelled	Top floor: 4x bedroom unit (F2-01 West facing, F2-14 South/West Facing unit, F2-15, F2-16, F2-18 – South facing) 1 space – dining lounge			

None of the small sample of rooms pass the overheating requirements for 2020s DSY1, unless active cooling via VRF is implemented. Currently, the following mitigation measures are proposed:

- Individual continuous mechanical ventilation units with heat recovery (for safety reasons)

- Glazing g-value of 0.40
- MVHR
- Active cooling

Actions:

- It is not clear which TM49 weather files have been used for this assessment. TM49 weather files for the London Weather Centre should be used which will more accurately represent the urban heat island effect as specified by the [overheating guidance](#).
- The applicant has not modelled DSY 2 or 3 for the development. Please also model these and ensure the design has incorporated as many mitigation measures to pass DSY 2 and 3 as feasible. Any remaining overheating should inform the future retrofit plan.
- Modelling the minimum representative number of spaces:
 - o Please include images indicating which sample rooms were modelled and a screenshot of the floorplans showing the modelled rooms in the context of the wider internal layout of and orientation of the building.
 - o In addition, the model should include other communal areas: in particular, the south-west facing treatment room and north-east facing café on the ground, lounge and the quiet room on south-west part of the first floor should be modelled.
 - o One or two worst-case hallways need to be included, with a realistic assumption of the heat gains from communal heating pipework.
 - o The report should annotate on plans which spaces are modelled for overheating risk.
- The report should outline what internal gains and occupancy patterns have been modelled for the communal areas for e.g.: dining lounges.
- The report should set out which spaces will need to be supplied by active cooling, and what the energy demand will be.
- Please model the proposed mitigation measures to reduce the overheating risk. The development will not be policy compliant until it can demonstrate that DSY1 is passed as a minimum, with a heatwave/retrofit plan (see next point below) in place based on more extreme weather files.
- Model DSY 2 and 3 for the 2020s weather period, in addition to the 2050s weather period for DSY1. These files should be modelled with appropriate retrofit

mitigation measures as part of a future retrofit plan. These measures should be possible to incorporate within the current building design and layout.

- Identify on plan which communal spaces (indoor and outdoor) will be appropriate for residents to cool down if their units are overheating (in line with the GLA's guidance criteria on Cool Spaces).
- Confirm who will own the overheating risk when the building is occupied (not the residents).
- Confirm whether the MVHR will have a summer bypass.

5. Overall Sustainability

Policy DM21 of the Development Management Document requires developments to demonstrate sustainable design, layout and construction techniques. The energy and sustainability report fails to set out the proposed measures to improve the sustainability of the scheme, including transport, health and wellbeing, materials and waste, flood risk and drainage, biodiversity, climate resilience, energy and CO2 emissions and landscape design.

The report proposes to reduce the internal water consumption with water efficient fittings reducing the consumption to 105 litres/person/day with dual flush capacity, low tap and shower flow rates.

Actions:

- Set out what urban greening and biodiversity enhancement measures will be proposed (e.g., green infrastructure, bird boxes, bat boxes etc to connect to the green spaces around the site, living roofs, living walls, etc.). These need to be identified within the planning submission so that the detail can be conditioned.
- What electric vehicle charging points are proposed? This allows the futureproofing of the development by ensuring the required power has been installed.
- What long- and short-term cycle parking is proposed? Staff and visitors need to have short-stay cycle parking facilities.
- A target (%) for responsible sourced, low-impact materials used during construction.
- Justify the demolition of the existing buildings in terms of its impact on the whole life carbon of the development and the circular economy principles.
- Set out how any demolition materials can be reused.

- Set out how surface water runoff will be reduced, that it will be separated from wastewater and not discharged into the sewer.
- Climate change mitigation should also be considered for the external spaces (shading, etc) and the impact of the increase in severity and frequency of weather events on the building structures.

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.

Actions:

- Submit a non-domestic BREEAM Pre-Assessment report.
- A table should be submitted to demonstrate which credits will be met, how many are met out of the total available, under which category, which could be achieved, and which will not be met. This needs to include justification where targets are not met or 'potential' credits. This will enable better assessment of which credits should be targeted.

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.

The Biodiversity Net Gain calculation shows a net gain of 10.18%, which is above the 10% requirement as set out in the Environment Act 2021. This is supported in principle, but this should be evidenced with measurable and implemented biodiversity benefits.

Action:

- Provide the Urban Greening Factor Statement.

6. 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.

This application is not required to submit a full statement. No reference has been made to reducing whole-life carbon within the proposed development. The applicant is strongly encouraged to consider using low-carbon materials, sourced as locally as possible.

7. Circular Economy

Policy SI7 requires applications referable to the Mayor of London to submit a Circular Economy Statement demonstrating how it promotes a circular economy within the design and aim to be net zero waste. Haringey Policy SP6 requires developments to seek to minimise waste creation and increase recycling rates, address waste as a resource and requires major applications to submit Site Waste Management Plans.

This application is not required to submit a full statement. No reference has been made to consider and integrate circular economy principles within the proposed development. Furthermore, the current demolition has not been adequately justified under Policy SI7. The applicant should consider implementing circular economy principles, such as designing for disassembly and reuse.

8. Conclusion

Overall, it is considered that the application **cannot currently be supported.**

Planning Conditions

To be secured (with detailed wording TBC):

- Energy strategy
- Overheating
- BREEAM Certificate
- Living roofs
- Biodiversity

Planning Obligations Heads of Terms

- Be Seen commitment to uploading energy data.
- Energy Plan

- Sustainability Review
- Estimated carbon offset contribution (and associated obligations) of £69,597, inclusive of 10% management fee; full contribution to be calculated at £2,850 per tCO2 at the Energy Plan and Sustainability stages.

Carbon Management Response 29/03/2023

Further to the response from above, planning conditions were requested for this application. The outstanding requests for information have been included within the draft conditions below.

Planning Conditions

To be secured:

Energy Strategy

The development hereby approved shall be constructed in accordance with the Energy and Sustainability Statement prepared by PHP Engineering Services Solutions Ltd (dated 6 Sep 2022) delivering a minimum 37% improvement on carbon emissions over 2021 Building Regulations Part L, with SAP10.2 emission factors, high fabric efficiencies, air source heat pumps (ASHPs) and a minimum 24 kWp solar photovoltaic (PV) array.

(a) Prior to above ground construction, details of the Energy Strategy shall be re-submitted to and approved by the Local Planning Authority. This must include:

- *Confirmation of how this development will meet the zero-carbon policy requirement in line with the Energy Hierarchy;*
- *Confirmation of the necessary fabric efficiencies to achieve a minimum 15% reduction with SAP10.2 carbon factors;*
- *Details to reduce thermal bridging;*
- *Calculated Primary Energy Factor, Energy Use Intensity and its performance against GLA benchmarks for a similar use.*
- *Annotated floorplans showing which spaces will be cooled.*
- *Location, specification and efficiency of the proposed ASHPs (Coefficient of Performance, Seasonal Coefficient of Performance, and the Seasonal Performance Factor), with plans showing the ASHP pipework and noise and visual mitigation measures;*

- *Specification and efficiency of the proposed Mechanical Ventilation and Heat Recovery (MVHR), with plans showing the rigid MVHR ducting and location of the unit;*
- *Details of the PV, demonstrating the roof area has been maximised, with the following details: a roof plan; the number, angle, orientation, type, and efficiency level of the PVs; how overheating of the panels will be minimised; their peak output (kWp); and how the energy will be used on-site before exporting to the grid;*
- *Updated GLA Carbon Emission Spreadsheet for Part L 2021 to demonstrate that the solar PV generation has been appropriately reflected in the above energy hierarchy.*
- *Specification of any additional equipment installed to reduce carbon emissions;*
- *Details on how lighting energy demand has been improved.*
- *A metering strategy*

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

(b) The solar PV arrays and air source heat pump must be installed and brought into use prior to first occupation of the relevant block. Six months following the first occupation of that block, evidence that the solar PV arrays have been installed correctly and are operational shall be submitted to and approved by the Local Planning Authority, including photographs of the solar array, installer confirmation, an energy generation statement for the period that the solar PV array has been installed, and a Microgeneration Certification Scheme certificate.

(c) Within six months of first occupation, evidence shall be submitted to the Local Planning Authority that the development has been registered on the GLA's Be Seen energy monitoring platform.

(d) Within one year of first occupation, evidence shall be submitted to and approved by the Local Planning Authority to demonstrate how the development has performed against the approved Energy Strategy and to demonstrate how occupants have been taken through training on how to use their homes and the technology correctly and in

the most energy efficient way and that issues have been dealt with. This should include energy use data for the first year and a brief statement of occupant involvement to evidence this training and engagement.

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

Overheating

Prior to the above ground commencement of the development, an updated Overheating Report shall be submitted to and approved by the Local Planning Authority. The report will assess the overheating risk in line with CIBSE TM59 (using the London Weather Centre TM49 weather DSY1-3 files for the 2020s, and DSY1 for the 2050s and 2080s) and demonstrate how the overheating risks have been mitigated and removed through design solutions. These mitigation measures shall be operational prior to the first occupation of the development hereby approved and retained thereafter for the lifetime of the development.

This report shall include:

- Revised modelling of units modelled based on CIBSE TM59, using the CIBSE TM49 London Weather Centre files for the DSY1-3 (2020s) and DSY1 2050s and 2080s, high emissions, 50% percentile;*
- Demonstrating the mandatory pass for DSY1 2020s can be achieved following the Cooling Hierarchy and in compliance with Building Regulations Part O, demonstrating that any risk of crime, noise and air quality issues are mitigated appropriately evidenced by the proposed location and specification of measures;*
- Annotated floorplans showing which spaces/units have been modelled. The report should model all single-aspect dwellings, min. 75% of rooms facing south or south-west, min. 50% of top-floor rooms, rooms closest to any risk of crime / noise and / or air pollution source, with windows closed at all times.*
- In addition, the report should model other communal areas: in particular, the south-west facing treatment room and north-east facing café on the ground, lounge and the quiet room on south-west part of the first floor.*
- One or two worst-case hallways need to be included, with a realistic assumption of the heat gains from communal heating pipework.*

- Modelling of proposed mitigation measures required to pass future weather files, clearly setting out which measures will be delivered before occupation and which measures will form part of the retrofit plan;
- Confirmation who will be responsible to mitigate the overheating risk once the development is occupied.
- Confirmation whether the MVHR will have a summer bypass.

(b) Prior to occupation of the development, details of internal blinds to all habitable rooms must be submitted for approval by the local planning authority. This should include the fixing mechanism, specification of the blinds, shading coefficient, etc. Occupiers must retain internal blinds for the lifetime of the development or replace the blinds with equivalent or better shading coefficient specifications.

(c) Prior to occupation, the development must be built in accordance with the approved overheating measures and retained thereafter for the lifetime of the development:

- Individual continuous mechanical ventilation units with heat recovery
- Glazing g-value of 0.40
- Active cooling
- Any further mitigation measures as approved by or superseded by the latest approved Overheating Strategy.

REASON: In the interest of reducing the impacts of climate change, to enable the Local Planning Authority to assess overheating risk and to ensure that any necessary mitigation measures are implemented prior to construction, and maintained, in accordance with London Plan (2021) Policy SI4 and Local Plan (2017) Policies SP4 and DM21.

Sustainability Strategy

Prior to above ground commencement of development, details of the sustainability strategy shall be submitted to and approved by the Local Planning Authority. This shall include specifications, plans and sections that demonstrate sustainable design, layout, construction techniques and proposed measures to improve the sustainability of the scheme including but not limited to sustainable transport, health and wellbeing, reduction of material use and waste, water consumption, and flood risk, drainage improvements, and biodiversity enhancement. The report shall include:

- Urban greening and biodiversity enhancement measures;
- Details on electric vehicles charging points, cycle parking facilities;

- *A target percentage for responsibly sourced, low-impact materials used during construction;*
- *Justification for the demolition of the existing buildings in terms of its impact on the whole life carbon of the development and the circular economy principles;*
- *Details on how any demolition materials can be reused;*
- *Details on how surface water runoff will be reduced and overall sustainable drainage strategy;*
- *Climate Change mitigation measures to be considered for the external spaces and the impact of the increase in severity and frequency of weather events on the building structures.*

Reason: To ensure the development provides the maximum provision towards increasing the level of sustainability in line with London Plan (2021) policies G6, S17 and Haringey Local Plan Policy SP4, DM21, DM25, and DM29.

BREEAM Pre-Assessment

a) Prior to the commencement of development, a sustainability assessment should be submitted to the planning authority which achieves the highest possible standard have been achieved through measurable outputs to demonstrate how environmental sustainability has been integrated into the development. This may be achieved through a BREEAM Pre-Assessment with a minimum 'Very Good' rating but aiming for Excellent, or similar independently audited assessment where measurable outputs can be demonstrated. This should include a table to demonstrate which credits will be met, how many are met out of the total available, under which category, which could be achieved, and justification for which credits will not be met.

(b) Upon approval, the measures shall be implemented on site prior to occupation and maintained thereafter for the lifetime of the development. A post-construction certificate shall be submitted to the Council within six months of occupation of the development.

Reasons: In the interest of addressing climate change and securing sustainable development in accordance with London Plan (2021) Policies S12, S13 and S14, and Local Plan (2017) Policies SP4 and DM21.

Living Roofs

(a) Prior to the above ground commencement of development, details of the living roof be submitted to and approved in writing by the Local Planning Authority. Living roof must be planted with flowering species that provide amenity and biodiversity value at different times of year. Plants must be grown and sourced from the UK and all soils and compost used must be peat-free, to reduce the impact on climate change. The submission shall include:

- i) A roof plan identifying where the living roof will be located;*
- ii) A section demonstrating settled substrate levels of no less than 120mm for extensive living roofs (varying depths of 120-180mm), and no less than 250mm for intensive living roofs (including planters on amenity roof terraces);*
- iii) Roof plans annotating details of the substrate: showing at least two substrate types across the roof, annotating contours of the varying depths of substrate*
- iv) Details of the proposed type of invertebrate habitat structures with a minimum of one feature per 30m² of living roof: substrate mounds and 0.5m high sandy piles in areas with the greatest structural support to provide a variation in habitat; semi-buried log piles / flat stones for invertebrates with a minimum footprint of 1m², rope coils, pebble mounds of water trays;*
- v) Details on the range and seed spread of native species of (wild)flowers and herbs (minimum 10g/m²) and density of plug plants planted (minimum 20/m² with roof ball of plugs 25m³) to benefit native wildlife, suitable for the amount of direct sunshine/shading of the different living roof spaces. The living roof will not rely on one species of plant life such as Sedum (which are not native);*
- vi) Roof plans and sections showing the relationship between the living roof areas and photovoltaic array; and*
- vii) Management and maintenance plan, including frequency of watering arrangements.*
- viii) A section showing the build-up of the blue roof and confirmation of the water attenuation properties, and feasibility of collecting the rainwater and using this on site;*

(b) Prior to the occupation of 90% of the development, evidence must be submitted to and approved by the Local Planning Authority that the living roof has been delivered in line with the details set out in point (a). This evidence shall include photographs demonstrating the measured depth of substrate, planting, and biodiversity measures. If the Local Planning Authority finds that the living roof has not been delivered to the approved standards, the applicant shall rectify this to ensure it complies with the condition. The living roof shall be retained thereafter for the lifetime of the development in accordance with the approved management arrangements.

	<p><i>Reason: To ensure that the development provides the maximum provision towards the creation of habitats for biodiversity and supports the water retention on site during rainfall. In accordance with London Plan (2021) Policies G1, G5, G6, S11 and S12 and Local Plan (2017) Policies SP4, SP5, SP11 and SP13.</i></p> <p><u><i>Biodiversity</i></u></p> <p><i>(a) Prior to the commencement of development, details of ecological enhancement measures and ecological protection measures shall be submitted to and approved in writing by the Council. This shall detail the biodiversity net gain, plans showing the proposed location of ecological enhancement measures, a sensitive lighting scheme, justification for the location and type of enhancement measures by a qualified ecologist, and how the development will support and protect local wildlife and natural habitats.</i></p> <p><i>(b) Prior to the occupation of development, photographic evidence and a post-development ecological field survey and impact assessment shall be submitted to and approved by the Local Planning Authority to demonstrate the delivery of the ecological enhancement and protection measures is in accordance with the approved measures and in accordance with CIEEM standards.</i></p> <p><i>Development shall accord with the details as approved and retained for the lifetime of the development.</i></p> <p><i>Reason: To ensure that the development provides the maximum provision towards the creation of habitats for biodiversity and the mitigation and adaptation of climate change. In accordance with London Plan (2021) Policies G1, G5, G6, S11 and S12 and Local Plan (2017) Policies SP4, SP5, SP11 and SP13.</i></p>	
<p>Transport</p>	<p>This application is for demolition of the three existing houses and redevelopment of the site to provide an 66 bed private care home (Class C2), with associated basement car parking, cycle storage, amenity space, refuse and recycling storage, landscaping and access arrangements.</p> <p>This is a reduced size proposal/application compared to the 2021 application made under 2021/2703 which was for an 80 room facility. Therefore, overall transportation demands are to be lower than this previous application.</p>	<p>Conditions and s106 obligation included</p>

Location and access

This site is located to the north side of Hampstead Lane, in between the junctions with Compton Avenue and Courtney Avenue. It is in the south western corner of the Borough.

It has a PTAL value of 1b which is considered 'very poor' access to public transport services. Within TfL's walk distance criteria for inclusion into the site's PTAL value there is one bus service, which is accessible within a 3 to 4 minute walk of the site.

However, it is noted that there is more than one bus service accessible from the site, so the WEBCAT/PTAL assessment output does under report bus service availability to and from the site. The PTAL output refers to the 210 service only, however both the 210 and 603 services are available from Hampstead Lane stops closest to the site (2 minutes walk one direction, 4 minutes walk the other) and the H3 is accessible from the stops on the Bishops Avenue which are 4 to 6 minutes way depending on direction sought. It is noted that the 603 only operates two services a day as it is essentially a schools service, however it may be useful for some staff depending on their start and finish times.

The site is not within any of the Borough's CPZ's.

Proposal and transportation considerations

The proposal is for the redevelopment of the Site, following the demolition of the three existing properties, to provide a 66 bed specialist care home with associated car parking at basement and ground floor level and cycle parking at basement level.

It is detailed that there will be 20 daytime staff and 10 night time staff working at the home.

Car parking is proposed both at ground level and a basement level, 19 spaces in total (12 in the basement) and 48 cycle parking spaces are proposed for location within the basement.

Access arrangements

Pedestrian access is to be via the main lobby accessed from Hampstead Lane. Cyclists can also use this access into the site or from the vehicular crossovers. Cycle parking is located within the basement and can be accessed via a lift however the lift will need to be of sufficient size to accommodate and cyclist and their cycle.

The existing crossovers for the buildings currently at this site will be retained so there will be vehicular access into the site via crossovers off Hampstead Lane (3 No.) and Courtenay Avenue.

Two vehicle lifts accessed off Hampstead Lane will be provided at the eastern boundary of the Site to enable access into a basement car park. One vehicle will be for access and one for egress, therefore ensuring access is still maintained should one have a mechanical fault.

Full details of the car lift system and associated breakdown procedures will need to be provided and this information can be covered by a pre commencement condition, to provide reassurance of robust arrangements in the eventuality of a breakdown.

Clarity over access/layout arrangements proposed

The applicant has now provided the key dimensions to clarify what the dimensions are between parking bays at both levels, and the clear distances between parking bays and the edges of the access route and parking bays through the site progressing from west to east, and between the banks of bays in the basement.

It appears quite a tight layout, however swept path plots have been provided, which do demonstrate that manoeuvres are possible to be made to access the route through the site and into and out of parking bays and the service bay. The swept paths do show some slight overrunning of the landscaped areas immediately adjacent to a couple of the bays but this should not be problematical.

Overall, the throughput of vehicle movements during a typical day is such that the busiest hour in terms on entries/exits is the AM peak hour where there are 8 arrivals and 3 departures to the site, so the absolute number of movements navigating the site during any given hour are relatively low.

Trips and transportation demand

The TA details the numbers of trips predicted to be made by staff, visitors and delivery and servicing vehicles and these are not going to create any adverse impacts with respect to highway and public transport capacities and networks. The proposed mode split/shares for staff are in the table below:

Table 2.2: Method of Travel to Work Data	
Method of Travel	Percentage
Underground	14%
Train	8%
Bus	17%
Taxi	0%
Motorcycle	1%
Driving a Car	40%
Passenger in a Car	2%
Bicycle	3%
On Foot	15%
Total	100%

The mode share of 40% for staff sounds relatively high however it is recognised that those staff working a night shift may for personal security reasons prefer use of a private car or lift rather than public transport. The applicant is amenable to providing a shuttle bus arrangement to provide a more sustainable means of staff getting to and from the site and the details of this can be covered in the travel plan.

20 staff is the maximum number of staff predicted with the daytime shift, and visitors to patients are expected to be at 60% of patients per day. 17 delivery and servicing movements are predicted per day too.

Visitors to the care home

The car arrivals/departures for visitors are detailed at 47 arrivals and 47 departures per day, which is detailed as 71% of residents predicted to receive a visitor a day. The TA considers this an over estimate of the likely volume of visitors to patients at the care home.

Visitors will be required to pre-book an arrival slot through phoning the care home. A booking system will therefore ensure that the number of visitors is managed. Should visitors arrive without pre-booking a slot, they will be turned away by on-site staff. This should ensure that on street parking demands should be minimised overall by preventing build ups of visitors at any given time.

Parking demands and considerations

Discussion in the TA on parking demands generated by the development references that peak car parking demands will materialise between 1 and 2pm (10 cars), and the TA assumes use of 10 basement spaces for staff at that time (related to the day shift of 20 staff) and 9 spare spaces, so effectively the TA asserts peak visitor demands can just about be accommodated on site rather than adding to on street parking demands.

Parking stress survey

A parking stress survey provided within the TA which was undertaken during June 2021. This did record very high parking stresses during the daytime period, with only 2 spaces available out of 101 in the survey area during the 10AM to 11AM period. The TA does comment that the weather was warm and many visitors to the Heath were observed parking and accessing it.

As there are no formal CPZ arrangements in place it is not possible to control on street parking directly.

Car parking

A total of 19 car parking spaces were initially proposed for the site, of which 12 are provided at basement level predominantly associated with staff, and 7 provided at ground floor level for visitor use. A total of 4 spaces will be provided with active electric vehicle charging points, with the remaining spaces provided with passive provision.

The applicant has now revised their basement parking arrangements to incorporate 2 blue badge parking spaces, accordingly the overall provision has reduced to 18 spaces in total.

The 40% mode share referenced for staff accessing the site is the driver for the basement bays proposed, based on 30 staff in total. The remainder of the parking provision proposed is essentially to accommodate peak demands from visitors.

With regards to blue badge parking, it is noted that none was included within the original application documents. Given the nature of the development and potential visitors to residents, and to accord with the London Plan 6% of parking bays should be blue badge bays. 2 were suggested.

The applicant subsequently provided a proposal for the provision of 3 blue badge bays at ground level. However, these appeared to be overdrawn on three of the existing ground floor bays proposed, and given the tight layout at this level, they did not appear practical with the space available.

The applicant has further revised their parking layout for the basement to provide two blue badge bays at that level, this will suffice given there is a lift to get visitors to the ground floor. This will mean a reduction of one space in overall parking numbers within the basement but this will be acceptable overall.

Cycle parking

Cycle parking for the development will be in excess of London Plan 2021 standards, which requires a total of 6 long-stay and 4 short-stay spaces to be provided. A total of 48 cycle parking spaces will be provided at basement level in sheltered and secure storage.

It is noted that cycle parking is proposed for the basement, there should be separated long stay and short stay parking. Full details of the proposed arrangements for the cycle parking will need to be included, with the system intending to be used, and dimensioned drawings showing the layout, spacing, headroom, routes to the cycle parking from the building access (including widths of passageways, numbers of doors, and dimensions of any lifts to be used). It is essential that the cycle parking is of the highest quality and easy to use to encourage the use of cycles. The TfL London Cycle Design Guide document should be followed for design of the long stay and short stay cycle parking.

Details of sufficient shower, locker and changing room provision should also be made to encourage staff to cycle to and from work.

The above details in relation to cycle parking can be covered in a pre-commencement condition.

Delivery and servicing arrangements

It is proposed that all delivery and servicing activity can be accommodated on site, which if achievable is welcomed. A one-way route is proposed through the Site and therefore

access and egress should occur in forward gear. A service bay is included at ground floor level.

Waste will be stored at basement level in a dedicated storage area. Private refuse collections will take place and it is understood colleagues in the waste team are supportive of the proposed arrangements which include collection from both within the site and from the public highway with arrangements to store bins without impeding the footway.

Workplace Travel plan

A draft workplace travel plan has been included within the application. This does include the initiatives expected such as the issuing of packs to advise as to public transport services, however other documents in the application reference car sharing and use of a mini bus to pick up and drop off staff, but these don't appear in the draft travel plan.

A detailed final draft incorporating all sustainable transport measures such as those referenced above will be required by condition.

A Monitoring fee will be required to cover officer time in reviewing the travel mode surveys and any other travel plan or transportation related aspects of the development and travel plan once occupied and operational. This fee will be £10,000 for a 5 year travel plan and can be covered by the S106 agreement for the development should consent be granted.

Construction Logistics Plan

An outline Construction Logistics Plan has been submitted. This references a two year build out. It also comments that all construction activity can take place within the site without the need for any temporary arrangements on the highway, however widening of the existing vehicular access off Courtenay Avenue.

There is a basement excavation and construction included and full details of how this will be undertaken will be required, including import and export of materials and plant, and measures to avoid impacting the safe operation of the public Highway.

A fully detailed document will be required for any forthcoming application, covered by a pre commencement condition, to detail how the development will be built whilst

minimising the impacts on the highway and adjacent neighbours. This document will need to detail the contract programme and duration, numbers of vehicle movements and vehicle types, means of keeping the highway free of dirt and debris, wheel washing arrangements, and arrangements for loading and unloading. The CLP will need to be informed by the outcome of discussions with the Highway Authority with respect to the intended build and access/servicing of the construction work.

Potential use of treatment room at ground level

Transportation are aware that the applicant is considering the use of a room at ground floor for a GP/Dentist or similar. The applicant has confirmed that if this is to be the case, a single patient/client at a time is seen, so at most one or two extra trips compared to the submitted proposals will be generated, aside from any extra staff. This should not be a problem however this regime should be capped by condition so as to prevent uplifts in person trips resulting from an increase in use of this additional treatment facility.

Conclusion

This application is for redevelopment of three houses at the site to enable construction of a new 66 bed care home. There will be a maximum of 20 staff members working during the day shift and potentially 30 at changeover times. The application predicts that 60% of residents will receive a visitor each day, and there will be a booking system to manage visits and avoid 'bunching' of visitors at certain times that would potentially add to on street parking demands.

The proposed parking provision should cater for most if not all of the potential employee and visitor parking demands generated by the development. Delivery and servicing will be catered for within the site and off the public highway, and the proposed arrangements for waste storage and collections are supported by Haringey's waste team.

The applicant has revised the basement car parking arrangements to ensure two blue badge spaces are provided, and will need complete the draft travel plan, plus provide full details of the proposed cycle parking and cyclist facility arrangements to encourage modal shift by staff to sustainable and active modes.

Finally, given the extent of construction work and a basement dig and build, and the proximity of the site to other residential properties and the public highway, a detailed CLP will be required.

	<p>Summarising, subject to the following S106 items and conditions, transportation do not object to this application;</p> <ul style="list-style-type: none"> • S106 Items <ol style="list-style-type: none"> 1. Travel Plan Monitoring Fee (£10,000 over 5 years) • Conditions (all pre commencement) <ol style="list-style-type: none"> 1. Full details of the proposed arrangements for the car lift, including breakdown and maintenance arrangements 2. Provision of the car parking layout within the basement to include two blue badge bays – dimensioned layout and accompanying swept paths plots to be provided for review 3. Travel Plan 4. Cycle parking details to meet the requirements of TfL’s London Cycle Design Standards and full details of the proposed arrangements for staff lockers, changing and showers 5. Fully detailed Construction Logistics Plan required. 	
External		
Basement (CampbellReith)	<p>NON-TECHNICAL SUMMARY</p> <p>CampbellReith was instructed by London Borough of Haringey, (LBH) to carry out an audit on the Basement Impact Assessment submitted as part of the Planning Submission documentation for 44-46 Hampstead Lane (planning reference HGY/2022/2731).</p> <p>The Audit reviewed the Basement Impact Assessment (BIA) for potential impact on land stability and local ground and surface water conditions arising from basement development in accordance with LBH’s policies and technical procedures, and following the London Borough of Camden (LBC) Planning Guidance: Basements, which is considered to provide a robust approach to impact assessment.</p>	<p>This is just the non-technical summary but full version of the response can be found with the application documents.</p>

	<p>CampbellReith was able to access LBH's Planning Portal and gain access to the latest revision of submitted documentation and reviewed it against an agreed audit check list. The proposal includes the construction of a basement to a depth of c. 7.20m below ground level (bgl) below part of the footprint of the house.</p> <p>Screening and scoping assessments are presented, supported by desk study information.</p> <p>It has been demonstrated the qualifications of the individuals involved in the production of the land stability and hydrology assessment are in accordance with LBH guidance. The BIA states that the site is at low and very low probability of flooding from all sources, and this is accepted. A Flood Risk Assessment has been undertaken and recommends the incorporation of suitable solutions to ensure the proposal will not increase the surface water flood risk.</p> <p>Anticipated pile depths, propping requirements in the temporary case, and sequencing information have been presented in a structural engineer statement along with groundwater ingress mitigation measures.</p> <p>Clarification on geotechnical parameters to be adopted in the detailed design has been presented, as detailed in Section 4.</p> <p>The Ground Movement Assessment (GMA) has been revised in accordance with the comments raised as part of the original audit.</p> <p>The BIA has demonstrated that an assessment regarding removal of trees is not necessary as existing neighbouring foundations are not within the zone of influence of those trees.</p> <p>Queries and requests for information are summarised in Appendix 2. Considering the additional information presented, the BIA meets the requirements of LBH guidance on basements.</p>	
<p>Historic England (Archaeology)</p>	<p>Comments received for withdrawn application HGY/2021/2703:</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>Noted – condition and informative attached.</p>

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.

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.

The planning application lies in an area of archaeological interest. It sites within the recently-defined Archaeological Priority Area for the mediaeval hunting park of the Bishop of London, as set out in the borough's emerging Local Plan. The application site itself lies on the southern edge of the park's extent, Hampstead Lane having followed its boundary since at least the middle ages.

There is scope therefore for buried remains of the park pale (the earth bank and ditch that surrounded the park) and associated remains. I am not persuaded by the conclusions of the heritage statement regarding low archaeological potential. An unusual narrow strip of land crosses the site on nineteenth century mapping and this may reflect pre-modern land use.

The scheme and its associated works have potential to harm buried archaeological assets. A programme of work to identify and manage any such assets, including evidence of the mediaeval bishop's hunting park, would be appropriate in policy terms.

I have looked at this proposal and at the Greater London Historic Environment Record. 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.

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.

I therefore recommend attaching a planning condition as follows:

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 2 WSI, no demolition/development shall take place other than in accordance with the agreed stage 2 WSI which shall include:

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.

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>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: Trench evaluation across the site to reliably identify any affected features, including any line of the park pale.</p> <p>You can find more information on archaeology and planning in Greater London on our website.</p> <p>This response relates solely to archaeological considerations. If necessary, Historic England's Development Advice Team should be consulted separately regarding statutory matters.</p>	
<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>Noted and conservation officer comments received</p>

<p>London Fire Brigade</p>	<p>The London Fire Commissioner (the Commissioner) is the fire and rescue authority for London. The Commissioner is responsible for enforcing the Regulatory Reform (Fire Safety) Order 2005 (as amended) in London.</p> <p>The Commissioner has been consulted with regard to the above-mentioned premises and makes the following observations:</p> <p>The Commissioner is satisfied with the proposals.</p> <p>Other comments: As per Approved Document B B5 for access and facilities for the fire service.</p>	<p>Noted – condition will cover fire safety.</p>
<p>Metropolitan Police (Designing Out Crime)</p>	<p><u>Section 1 - Introduction:</u> 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 my knowledge and experience as a Designing Out Crime Officer and as a Police Officer.</p> <p>It is in our professional opinion that crime prevention and community safety are material considerations because of the mixed use, complex design, layout and the sensitive location of the development. To ensure the delivery of a safer development in line with L.B. Haringey DMM4 and DMM5 (See Appendix), we have highlighted some of the main comments we have in relation to Crime Prevention (Appendices 1).</p> <p>We have not met with the original project Architects to discuss the Crime Prevention and Secured by Design at pre-application stage and express any concerns around the design and layout of the development. There is mention of crime prevention and Secured by Design in the Design and Access Statement referencing design out crime or crime prevention. We request that the developer contacts us at the earliest convenience to ensure that the development is designed to reduce crime at an early.</p> <p>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>Noted – condition and informative attached.</p>

Whilst in principle we have no objections to the site, in light of the changes to the original design we have recommended the attaching of suitably worded conditions and an informative. The comments made can easily be mitigated early if the Architects ensure the ongoing dialogue with our department continues throughout the design and build process. This can be achieved by the below Secured by Design conditions being applied (Section 2). If the Conditions are applied, we request the completion of the relevant SBD application forms at the earliest opportunity.

The project has the potential to achieve a Secured by Design Accreditation if advice given is adhered to.

Section 2 - Secured by Design Conditions and Informative:

In light of the information provided, we request the following Conditions and Informative:

Conditions:

A. Prior to the first occupation of each building or part of a building or use, a 'Secured by Design' accreditation shall be obtained for such building or part of such building or use and thereafter all features are to be permanently retained. Accreditation must be achieved according to current and relevant Secured by Design guidelines at the time of above grade works of each building or phase of said development. Confirmation of the certification shall be submitted to and approved in writing by the Local Planning Authority.

Reason: In the interest of creating safer, sustainable communities.

Informative:

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

Section 3 - Conclusion:

We would ask that our department's interest in this planning application is noted and that we are advised of the final Decision Notice, with attention drawn to any changes within the development and subsequent Condition that has been implemented with crime prevention, security and community safety in mind.

<p>Thames Water</p>	<p><u>Waste Comments</u></p> <p>As required by Building regulations part H paragraph 2.36, Thames Water requests that the Applicant should incorporate within their proposal, protection to the property to prevent sewage flooding, by installing a positive pumped device (or equivalent reflecting technological advances), on the assumption that the sewerage network may surcharge to ground level during storm conditions. If as part of the basement development there is a proposal to discharge ground water to the public network, this would require a Groundwater Risk Management Permit from Thames Water. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 02035779483 or by emailing trade.effluent@thameswater.co.uk. Application forms should be completed on line via www.thameswater.co.uk. Please refer to the Wholesale; Business customers; Groundwater discharges section.</p> <p>The proposed development is located within 15 metres of a strategic sewer. Thames Water requests the following condition to be added to any planning permission. "No piling shall take place until a PILING METHOD STATEMENT (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement." Reason: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to significantly impact / cause failure of local underground sewerage utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. https://www.thameswater.co.uk/developers/larger-scale-developments/planning-yourdevelopment/working-near-our-pipes. Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB.</p>	<p>Trade effluence, public sewers will be covered as an informative</p>

Thames Water would recommend that petrol / oil interceptors be fitted in all car parking/washing/repair facilities. Failure to enforce the effective use of petrol / oil interceptors could result in oil-polluted discharges entering local watercourses. As you are redeveloping a site, there may be public sewers crossing or close to your development. If you discover a sewer, it's important that you minimize the risk of damage. We'll need to check that your development doesn't limit repair or maintenance activities, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. <https://www.thameswater.co.uk/developers/larger-scale/developments/planning-yourdevelopment/working-near-our-pipes>

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-yourdevelopment/working-near-our-pipes>

With the information provided, Thames Water has been unable to determine the Foul water infrastructure needs of this application. Thames Water has contacted the developer in an attempt to obtain this information and agree a position for FOUL WATER drainage, 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:- 1. Foul 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 Foul 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 sewage flooding and/or potential pollution incidents. The developer can request

	<p>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><u>Water Comments</u> If you are planning on using mains water for construction purposes, it's important you let Thames Water know before you start using it, to avoid potential fines for improper usage. More information and how to apply can be found online at thameswater.co.uk/buildingwater.</p> <p>On the basis of information provided, Thames Water would advise that with regard to water network and water treatment infrastructure capacity, we would not have any objection to the above planning application. Thames Water recommends the following informative be attached to this planning permission. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.</p> <p><u>Supplementary Comments</u> To allow for an accurate sewer capacity assessment of the FOUL SEWER NETWORK, please confirm proposed foul water pump rate and connection location.</p>	
NEIGHBOURING PROPERTIES	Objection	Officer Response
	<p>Principle:</p> <ul style="list-style-type: none"> • Questionable demand for this product; • Demand is for affordable but none provided; • Lack of clarity of end use / user; • Loss of local housing stock; • Residential not commercial area / area of change; • No assessment of suitability of retaining existing dwellings; 	<p>The proposed development would provide a high quality care home (Use Class C2) specialising in dementia care, of which there is a proven under-supply.</p> <p>There should be provision for choice in the market. There is no policy requirement for affordable housing contribution.</p>

	<ul style="list-style-type: none"> • Is in an Area of Limited Change (Local Plan SP1) 	<p>The application has been made on behalf of an end user (Care Concern Group) and will have obligations and conditions pertaining to specific use.</p> <p>The provision of the care home will favourably compensate to housing targets and choice of housing supply compared to the loss of 2 private dwellings.</p> <p>The use is compatible with residential areas.</p> <p>There is no suggestion the houses could not be retained for residential use. The proposed use would make retention unfeasible though, due to functional requirements.</p> <p>Areas of Limited Change support modest but still important contribution to local development needs. The compatibility of residential care home would retain the character of area and not create significant change, with clear local benefits.</p>
	<p>Design / Heritage:</p> <ul style="list-style-type: none"> • Out of character scale – bulky, relative scale, proximity to boundaries; • Contrary to detached dwelling in generous plot character; • Not Arts & Crafts style; • Too many examples of large replacement dwellings in the area; • Other large purpose built developments on the Bishops Road; • Overdevelopment and detrimental to Conservation Area character; 	<p>Officers assessment on Heritage issues have been comprehensively explained in the main body of the report and addresses the objections raised by residents. Officers consider the scale and massing of the proposed building to be acceptable on the site, especially given the public benefits of high quality dementia care provision. The glazed link will retain some visual separation of massing and space to rear and sides will be retained.</p>

	<ul style="list-style-type: none"> • Proximity to listed Kenwood Park and Garden, Kenwood House and associated buildings; • Demolition contrary to Highgate policies – if use not compatible with existing then consider other uses; • Existing buildings make positive impact; • No public benefits to outweigh harm; • Backland development; • Insufficient details regarding site levels; • Scale would tower over No.1 Courtenay Avenue; • No break in the frontage of the proposed building. 	<p>The design and architectural language has been praised by Conservation and Design Officers for the contemporary response to Arts & Crafts.</p> <p>Unlike other demolitions, this is not demolition and rebuilding a single dwelling, but for a specific purpose and providing high quality accommodation for public benefit.</p> <p>The specifics of this use and outstanding short fall in dementia care and quality of care accommodation in the area have been taken into account.</p> <p>The site is in close proximity to Kenwood House but is considered to retain a suitable relationship with that setting.</p> <p>The existing buildings are neutral contributors. The impact of demolition and public benefit is considered in depth in the officer report.</p> <p>This is comprehensive redevelopment rather than backland development. The rear garden would be retained.</p> <p>The elevations show sufficient context, as do CGIs. Final site levels will be confirmed through standard site levels condition.</p> <p>The increased massing would exacerbate the relationship with Courtenay Avenue, but these</p>
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	<p>Amenity:</p> <ul style="list-style-type: none"> • Disturbance from use; • Overlooking exacerbated by large windows, sloping site and removal of trees and commercial use of the site; • Overbearing / enclosing from larger scale; • Overshadowing. 	<p>This will be a managed facility, compatible with a residential area.</p> <p>Overlooking from windows would be onto side elevation of no.1 and the side to rear garden, which would have sufficient separation from the proposed rear elevation. The café would not be an intense use, but an ancillary area for visitors and residents of the facility to congregate.</p> <p>The scale would sit comfortably within the site and retain a suitable relationship with neighbours.</p> <p>The overshadowing would comply with BRE standards.</p>
	<p>Basement impact:</p> <ul style="list-style-type: none"> • Issue of stability, water diversion, ecology; • Water drainage and water table issues. 	<p>The BIA has been examined externally by technical engineers, who are satisfied with the findings and level of detail.</p>
	<p>Transport impacts:</p> <ul style="list-style-type: none"> • Unsustainable site – will encourage car use; • Low PTAL; • Parking stress; • Car use of staff questioned; • Bus services infrequent; 	<p>The PTAL is low but the site does have access to public transport, with three tube stations in close proximity.</p> <p>The proposed development would provide suitable on-site parking and management of</p>

	<ul style="list-style-type: none"> • Issues of servicing plan - narrowness / restricted width on Sheldon Avenue; • Increased traffic movements at entry to Courtenay Avenue – safety concerns; • Construction issues around gate and vehicle movements; • Visitor numbers at peak time; • Number of carers per patient questioned; • Safety issues from use of Courtenay entrance; • Pollution from additional cars; • Potential waste issues; • Pedestrian entrance should be removed as no permission granted from Courtenay Avenue residents. 	<p>visitors. Staff parking is based on TRICS data. Not contrary source for the assumed question of staff travel is given.</p> <p>Buses travelling in both directions on Hampstead Lane and The Bishops Avenue, which access tube stations. A travel plan will also encourage sustainable transport and transport for employees.</p> <p>The servicing will be from an and in and out system and compliance with a servicing and management plan. Thus will avoid issues of vehicles on either highway.</p> <p>The impact on pollution will be negligible and more broadly considered within an encouragement of sustainable transport.</p> <p>A private waste arrangement will be in place to ensure suitable collection and management.</p>
	<p>Impact on MOL:</p> <ul style="list-style-type: none"> • MOL should be given same weight as green belt; • Development adjacent to MOL should retain openness, character historical significance and not harm public enjoyment • No verified views from MOL 	<p>The development would retain separation from MOL and would not harm these designated areas. Trees on site would largely be retained and replaced where necessary. Trees around these areas would be retained. There is no obligation to protect views from MOL. Regardless, this is considered to respect that setting.</p>

	<p>Other issues:</p> <ul style="list-style-type: none">• Internal layout issues including some non-compliance with BRE;• Loss of trees – questionable level of replacement;• Lack of ambition for biodiversity;• Impact on sewage network;• Electricity use so high it would need own substation (generator room);• Lack of renewable energy solutions;• No assessment of embodied carbon.	<p>The internal layouts are considered to be sufficient to ensure good outlook, daylight and sunlight to residents.</p> <p>The trees and landscaping proposed will be required to have a crown coverage not less than existing.</p> <p>Landscaping, urban greening and biodiversity net gains will be covered by condition.</p> <p>Renewable energy solutions and low carbon measures are considered to suffice and an offset will be paid to cover any shortfall.</p> <p>Embodied carbon assessment only required for Mayoral referable schemes, but this will be factored in as part of a wider sustainability statement condition.</p>
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