Appendix 3: Internal and External Consultee representations

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Carbon Management Response 20/06/2023

In preparing this consultation response, we have reviewed:
• Energy Statement (BQ-WSP-XX-XX-ST-ES-0001-no_appendix_June2023) prepared by WSP (dated 13th June 2023)
• GLA Carbon Emission reporting spreadsheet dated May 2023
• HGY-2023-0261 Berol Quarter N17 – May response to the comments from CMT
• Noise and Vibration Assessment prepared by WSP (dated December 2022)
• Relevant supporting documents.

1. Summary
The development achieves a reduction of 72% carbon dioxide emissions. This increase in on-site savings is supported in principle. Some clarifications must be provided with regard to the Overheating Strategy. Appropriate planning conditions have been recommended to secure this which includes some outstanding requests for information.

2. Energy Strategy
The applicant has amended the carbon reduction values in the report and submitted the GLA’s carbon emission reporting spreadsheet.

<table>
<tr><td colspan="4">Site-wide (SAP10 emission factors)</td></tr>
<tr><td></td><td>Total regulated emissions (Tonnes CO_2 / year)</td><td>CO_2 savings (Tonnes CO_2 / year)</td><td>Percentage savings (%)</td></tr>
<tr><td>Part L 2013 Baseline</td><td>412.4</td><td></td><td></td></tr>
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Be Clean	121.7	200.4	49%
Be Green	115	6.7	2%
Cumulative savings		297.4	72%
Carbon shortfall to offset (tCO_2)	115		
Carbon offset contribution	£95 x 30 years x 115 tCO_2/year = £327,750		
10% management fee	£32,775		

2 Berol Yard:

	Residential			**Non-residential**		
(SAP10 emission factors)	**Total regulated emissions (tCO_2/ year)**	**CO_2 savings (tCO_2 / year)**	**Percentage savings (%)**	**Total regulated emissions (tCO_2/ year)**	**CO_2 savings (tCO_2/ year)**	**Percentage savings (%)**
Part L 2013 Baseline	205.8			33.4		
Be Lean savings	137.3	68.5	10.6%	27.9	5.5	16.5%
Be Clean savings	80.2	57	69%	21.5	6.4	19.1%
Be Green savings	75.3	4.9	1%	21.5	0	0%
Cumulative savings		75.3	81%		11.9	35.6%
Carbon shortfall to	39.7			21.5		

offset (tCO_2)						

Berol House:

	Refurbishment (non-residential)			**Extension (non-residential)**		
(SAP10 emission factors)	**Total regulated emissions (tCO_2/ year)**	**CO_2 savings (tCO_2 / year)**	**Percentage savings (%)**	**Total regulated emissions (tCO_2/ year)**	**CO_2 savings (tCO_2/ year)**	**Percentage savings (%)**
Part L 2013 Baseline	134			38.3		
Be Lean savings	80.4	53.6	40%	28.9	9.4	24.5%
Be Clean savings	34.5	19.1	34%	24.2	4.7	12.4%
Be Green savings	34.5	0	74%	19.3	4.9	12.8%
Cumulative savings		48.1	74%		19	49.7%
Carbon shortfall to offset (tCO_2)	34.5			19.3		

Energy Use Intensity / Space Heating Demand

The Energy Use Intensity exceeds the GLA target of 35kWh/m^2/year for residential and 55kWh/m^2/year for the non-residential part of the development. The applicant has shown commitment to improve the values in future design stages.

Space Heating Demand for residential part of the development falls short of the GLA target of 15kWh/m^2/year. For the non-residential part of the development, except Berol House refurbishment, other commercial spaces perform well against the GLA benchmark.

Building type	**EUI (kWh/m^2/year)**		**Space Heating Demand (kWh/m^2/year)**	**Methodology used**
Residential	56.5	Regulated only	20.8	SAP
Berol House Refurb	106.4	Regulated only	69.8	Part L2
Berol House Extension	50.6	Regulated only	6.9	Part L2
Berol Yard	65.6	Regulated only	10.	Part L2

Energy – Lean
The applicant has clarified:

- the windows to be replaced and sealed to improve the fabric efficiency and air tightness.
- the addition of the extension on top of the refurbished part of the development will remove the roof which will limit the heat transfer to the outside as the upper-level extensions will further improve the insulation.

Energy – Clean
The previous comments are outstanding.

Energy – Green
No further actions required.

Energy – Be Seen
No further actions required.

	3. Carbon Offset Contribution A carbon shortfall of 115 tCO_2/year remains. The remaining carbon emissions will need to be offset at £95/tCO_2 over 30 years. Applicant has confirmed to carry out the calculation in the next stage of the project programme to future proof the project. <u>Action:</u> - Energy modelling of the two scenarios is needed to calculate the deferred carbon offset contribution. Please provide the energy modelling for these scenarios. This is conditioned. **4. Overheating** The assessment does not report the overheating assessment for the refurbishment and extension part of the development. The applicant has not appropriately assessed the noise and air quality constraints in relation to the overheating risk. The overheating assessment should be done with closed windows for locations where the noise pollution is a constrain. The noise impact assessment Figure 5-3 and 5-4 shows the locations near the Watermead Way to have noise levels exceeding 55dB at night. The description of the noise constraint to opening windows is provided in paragraph 3.3 in the Approved Document – O. <u>Actions:</u> - Please perform overheating assessment for the refurbishment and extension part of the development. - Please remodel at the locations where noise pollution is a constraint with closed windows. **5. Sustainability** No further actions required. **Planning Obligations Heads of Terms** - Be Seen commitment to uploading energy data	

	- Energy Plan - Sustainability Review - Estimated carbon offset contribution (and associated obligations)), plus a 10% management fee; carbon offset contribution to be re-calculated at £2,850 per tCO2 at the Energy Plan and Sustainability stages. - DEN connection (and associated obligations) - Heating strategy fall-back option if not connecting to the DEN <u>The outstanding requests for information have been included within the draft conditions below.</u> **Planning Conditions** To be secured if approved: <u>Energy strategy:</u> *The development hereby approved shall be constructed in accordance with the Energy Statement prepared by WSP (dated 13th June 2023) delivering a minimum 72% improvement on carbon emissions over 2013 Building Regulations Part L, with SAP10 emission factors, high fabric efficiencies, connection to the Decentralised Energy Network, and a minimum 31kWp solar photovoltaic (PV) array.* *(a) Prior to above ground construction, details of the Energy Strategy shall be submitted to and approved by the Local Planning Authority. This must include:* - *Carbon reduction following the energy hierarchy for future connection to DEN and Low-carbon Plan B scenario;* - *The applicant needs to achieve the following: (1) A combined DLF (for the offsite and onsite network) of 1.25, (2) this should assume the offsite DLF is 1.05 (and so the onsite network will have a DLF of 1.25/1/05-1/19); and (3) to certify that the combined DLF through the PCDB.* - *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 10% reduction with SAP10 carbon factors;* - *Details on what measures will be undertaken to make the retained listed buildings more energy efficient (what type of insulation, how the building will be made more airtight, etc).* - *Details to reduce thermal bridging;* - *Calculated Primary Energy Factor, Energy Use Intensity and space heating demand and its performance against GLA benchmarks for a similar use;* - *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;* - *Specification of any additional equipment installed to reduce carbon emissions;* - *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 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. *Reason: To ensure the development reduces its impact on climate change by reducing carbon emissions on site in compliance with the Energy Hierarchy, and in line with London Plan (2021) Policy SI2, and Local Plan (2017) Policies SP4 and DM22.* <u>DEN Connection:</u> *Prior to the above ground commencement of construction work, details relating to the future connection to the DEN must be submitted to and approved by the local planning authority. This shall include:* • *Further detail of how the developer will ensure the performance of the DEN system will be safeguarded through later stages of design (e.g. value engineering proposals by installers), construction and commissioning including provision of key information on system performance required by CoP1 (e.g. joint weld and HIU commissioning certificates, CoP1 checklists, etc.);* • *Peak heat load calculations in accordance with CIBSE CP1 Heat Networks: Code of Practice for the UK (2020) taking account of diversification.* • *Detail of the pipe design, pipe sizes and lengths (taking account of flow and return temperatures and diversification), insulation and calculated heat loss from the pipes in Watts, demonstrating heat losses have been minimised together with analysis of stress/expansion;* • *A before and after floor plan showing how the plant room can accommodate a heat substation for future DEN connection. The heat substation shall be sized to meet the peak heat load of the site. The drawings should cover details of the phasing including any plant that needs to be removed or relocated and access routes for installation of the heat substation;* • *Details of the route for the primary pipework from the energy centre to a point of connection at the site boundary including evidence that the point of connection is accessible by the area wide DEN, detailed proposals for installation for the route*	

	that shall be coordinated with existing and services, and plans and sections showing the route for three 100mm diameter communications ducts; • *Details of the route for connecting the non-residentials Berol House with the energy centre in 2 Berol Yard;* • *Details of the location for building entry including dimensions, isolation points, coordination with existing services and detail of flushing/seals;* • *Details of the location for the set down of a temporary plant to provide heat to the development in case of an interruption to the DEN supply including confirmation that the structural load bearing of the temporary boiler location is adequate for the temporary plant and identify the area/route available for a flue;* • *Details of a future pipework route from the temporary boiler location to the plant room.* *Reason: To ensure the development reduces its impact on climate change by reducing carbon emissions on site in compliance with the Energy Hierarchy, and in line with London Plan (2021) Policy SI2 and SI3, and Local Plan (2017) Policies SP4 and DM22.* <u>Overheating</u> *(a) Prior to the above ground commencement of the development, revised Overheating Report shall be submitted to and approved by the Local Planning Authority. The submission shall assess the overheating risk and propose a retrofit plan for <u>both new build and refurbished</u> part of the development. This assessment shall be based on the TM52 and TM59 Overheating modelling undertaken by WSP (Energy statement dated 13th June 2023).* *This report shall include:* - *Revised modelling of units modelled based on CIBSE TM52/59, 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 distribution heat losses, external shading, crime, noise and air quality issues are assessed and mitigated appropriately evidenced by the proposed location and specification of measures; - *Modelling of 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 that the retrofit measures can be integrated within the design (e.g., if there is space for pipework to allow the retrofitting of cooling and ventilation equipment), setting out mitigation measures in line with the Cooling Hierarchy;* - *Confirmation who will be responsible to mitigate the overheating risk once the development is occupied.* *(b) Prior to occupation, the development must be built in accordance with the approved overheating measures and retained thereafter for the lifetime of the development as approved by or superseded by the latest approved Overheating Strategy.* *If the design of Blocks is amended, or the heat network pipes will result in higher heat losses and will impact on the overheating risk of any units, a revised Overheating Strategy must be submitted as part of the amendment application.* *REASON: In the interest of reducing the impacts of climate change, to enable the Local Planning Authority to assess overheating risk and to ensure that any necessary mitigation measures are implemented prior to construction, and maintained, in accordance with London Plan (2021) Policy SI4 and Local Plan (2017) Policies SP4 and DM21.* <u>Overheating Building User Guide</u> *Prior to occupation of the residential dwellings, a Building User Guide for new residential occupants shall be submitted in writing to and for approval by the Local Planning Authority. The Building User Guide will advise residents how to operate their property during a heatwave, setting out a cooling hierarchy in accordance with London Plan (2021)*	

	Policy SI4 with passive measures being considered ahead of cooling systems. The Building User Guide will be issued to residential occupants upon first occupation. *Reason: In the interest of reducing the impacts of climate change and mitigation of overheating risk, in accordance with London Plan (2021) Policy SI4, and Local Plan (2017) Policies SP4 and DM21.* <u>BREEAM Certificates</u> *(a) Prior to commencement on site, a design stage accreditation certificate for every type of non-residential category must be submitted to the Local Planning Authority confirming that the development will achieve a BREEAM "Very Good" outcome (or equivalent), aiming for "Excellent". This should be accompanied by a tracker demonstrating which credits are being targeted, and why other credits cannot be met on site.* *The development shall then be constructed in strict accordance with the details so approved, shall achieve the agreed rating and shall be maintained as such thereafter for the lifetime of the development.* *(b) Prior to occupation, a post-construction certificate issued by the Building Research Establishment must be submitted to the local authority for approval, confirming this standard has been achieved.* *In the event that the development fails to achieve the agreed rating for the development, a full schedule and costings of remedial works required to achieve this rating shall be submitted for our written approval with 2 months of the submission of the post construction certificate. Thereafter the schedule of remedial works must be implemented on site within 3 months of the Local Authority's approval of the schedule, or the full costs and management fees given to the Council for offsite remedial actions.* *Reason: In the interest of addressing climate change and securing sustainable development in accordance with London Plan (2021) Policies SI2, SI3 and SI4, and Local Plan (2017) Policies SP4 and DM21.*	

	Living roof(s) *(a) Prior to the above ground commencement of development, details of the living roofs must be submitted to and approved in writing by the Local Planning Authority. Living roofs must be planted with flowering species that provide amenity and biodiversity value at different times of year. Plants must be grown and sourced from the UK and all soils and compost used must be peat-free, to reduce the impact on climate change. The submission shall include:* *i) A roof plan identifying where the living roofs will be located;* *ii) A section demonstrating settled substrate levels of no less than 120mm for extensive living roofs (varying depths of 120-180mm), and no less than 250mm for intensive living roofs (including planters on amenity roof terraces);* *iii) Roof plans annotating details of the substrate: showing at least two substrate types across the roofs, annotating contours of the varying depths of substrate* *iv) Details of the proposed type of invertebrate habitat structures with a minimum of one feature per 30m^2 of living roof: substrate mounds and 0.5m high sandy piles in areas with the greatest structural support to provide a variation in habitat; semi-buried log piles / flat stones for invertebrates with a minimum footprint of 1m^2, rope coils, pebble mounds of water trays;* *v) Details on the range and seed spread of native species of (wild)flowers and herbs (minimum 10g/m^2) and density of plug plants planted (minimum 20/m^2 with root ball of plugs 25cm^3) to benefit native wildlife, suitable for the amount of direct sunshine/shading of the different living roof spaces. The living roofs will not rely on one species of plant life such as Sedum (which are not native);* *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 roofs 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 roofs have been delivered in line with the details set out in point (a). This evidence shall include photographs demonstrating the measured depth of substrate, planting and biodiversity measures. If the Local Planning Authority finds that the living roofs have not been delivered to the approved standards, the applicant shall rectify this to ensure it complies with the condition. The living roofs shall be retained thereafter for the lifetime of the development in accordance with the approved management arrangements. *Reason: To ensure that the development provides the maximum provision towards the creation of habitats for biodiversity and supports the water retention on site during rainfall. In accordance with London Plan (2021) Policies G1, G5, G6, SI1 and SI2 and Local Plan (2017) Policies SP4, SP5, SP11 and SP13.* <u>Circular Economy (Pre-Construction report, Post-Completion report)</u> *Prior to the occupation [of any phase / building/ development], a Post-Construction Monitoring Report should be completed in line with the GLA's Circular Economy Statement Guidance.* *The relevant Circular Economy Statement shall be submitted to the GLA at: circulareconomystatements@london.gov.uk, along with any supporting evidence as per the guidance. Confirmation of submission to the GLA shall be submitted to, and approved in writing by, the Local Planning Authority, prior to the occupation [of any phase / building/ development.* *Reason: In the interests of sustainable waste management and in order to maximise the re-use of materials in accordance with London Plan (2021) Policies D3, SI2 and SI7, and Local Plan (2017) Policies SP4, SP6, and DM21.* <u>Whole-Life Carbon</u> *Prior to the occupation of each building, the post-construction tab of the GLA's Whole Life Carbon Assessment template should be completed in line with the GLA's Whole Life*	

	Carbon Assessment Guidance. The post-construction assessment should provide an update of the information submitted at planning submission stage. This should be submitted to the GLA at: ZeroCarbonPlanning@london.gov.uk, along with any supporting evidence as per the guidance. Confirmation of submission to the GLA shall be submitted to, and approved in writing by, the Local Planning Authority, prior to occupation of the relevant building. *Reason: In the interests of sustainable development and to maximise on-site carbon dioxide savings in accordance with London Plan (2021) Policy SI2, and Local Plan (2017) Policies SP4 and DM21.* <u>Biodiversity</u> *(a) Prior to the commencement of development, details of ecological enhancement measures and ecological protection measures shall be submitted to and approved in writing by the Council. This shall detail the biodiversity net gain, plans showing the proposed location of ecological enhancement measures, a sensitive lighting scheme, justification for the location and type of enhancement measures by a qualified ecologist, and how the development will support and protect local wildlife and natural habitats.* *(b) Prior to the occupation of development, photographic evidence and a post-development ecological field survey and impact assessment shall be submitted to and approved by the Local Planning Authority to demonstrate the delivery of the ecological enhancement and protection measures is in accordance with the approved measures and in accordance with CIEEM standards.* *Development shall accord with the details as approved and retained for the lifetime of the development.* *Reason: To ensure that the development provides the maximum provision towards the creation of habitats for biodiversity and the mitigation and adaptation of climate change. In accordance with London Plan (2021) Policies G1, G5, G6, SI1 and SI2 and Local Plan (2017) Policies SP4, SP5, SP11 and SP13.*	

Carbon Management Response 24/05/2023

In preparing this consultation response, we have reviewed:

- Energy Statement (BQ-WSP-XX-XX-ST-ES-0001-amendedtable-no_appendix) prepared by WSP (dated 9th November 2022)
- HGY-2023-0261 Berol Quarter N17 – May response to the comments from CMT
- Whole Life Cycle Carbon Assessment prepared by WSP Rev 2 (dated 9th May 2023)
- Circular Economy Statement prepared by WSP Rev 3 (dated 17th May 2023)
- Relevant supporting documents.

1. Summary

The development achieves a reduction of 66.9% carbon dioxide emissions on site, which is supported.

2. Energy Strategy

The applicant has amended the carbon reduction values and shared the SAP and BRUKL sheets. The GLA's carbon emission reporting spreadsheet is missing.

Actions:

- Please submit the GLA's Carbon Emission Reporting Spreadsheet.

Energy Use Intensity / Space Heating Demand

Building type	**EUI (kWh/m^2/year)**		**Space Heating Demand (kWh/m^2/year)**	**Methodology used**

The applicant requests to share the EUI in the subsequent design stages.

	Actions:
	- For all sections of the development including residential, non-residential, extension and refurbishment:
	  o Provide the calculated Energy Use Intensity (excluding renewable energy) and comment on its performance against GLA benchmarks. Please submit the information in line with the above template.
	  o What is the calculated space heating demand? How does this perform against the GLA benchmark of 15 kWh/m2/year?
	
	Energy – Lean
	The SAP calculation for Berol House has been rerun as requested and the BRUKL sheets is submitted. The applicant has requested to condition the details of the MVHR units.
	
	Actions:
	- Refurbishments- provide more detail on the measures that will be undertaken to make the retained listed buildings more energy efficient (improving the air tightness, insulation, etc)
	
	Overheating is dealt with in more detail below.
	
	Energy – Clean
	From a planning perspective, we support temporary connection to gas boilers. However, in absence of the DEN, the applicant needs to comply with Part L.
	
	The submitted DEN connection route is supported in principle but it needs to be properly designed to consider the following:
	- Detailed building entry design
	- Expansion and stress – the straight N-S section may need an expansion loop
	- Coordination with other buried services e.g. drainage.
	- Coordination with above ground.	

	As the commercial units are >500m^2, they should be connected to a single site wide network (i.e. Berol House should be connected to Berol Yard). They would then be indirectly connected to the DEN via 1 Berol Yard. The applicant needs to achieve the following: 1. A combined DLF (for the offsite and onsite network) of 1.25 2. That this should assume the offsite DLF is 1.05 (and so the onsite network will have a DLF of 1.25/1/05-1/19); and 3. To certify that the combined DLF through the PCDB. The applicant will need to demonstrate that they will provide the following details prior to the commencement of construction: a) Buried pipe (dry and filled with nitrogen) to our specification from the GF plant room to a manhole at the boundary of the site (the DEN pipe will access the site in GF from Ashley Road in line with the Green link) and evidence of any obstructions in highway adjacent to connection point; please note that the pipes cannot be running through retail units where access in compromised; b) A good quality network within the building – 60/40 F&R, <50W/dwelling losses from the network – ideally to an agreed standard in the S106; c) A clear plan for QA of the network post-design approval through to operation, based on CP1; d) A clear commercial strategy identifying who will sell energy to residents and how prices/quality of service will be set. <u>Actions:</u> - As the commercial units are <500m^2 , the non-residential space should be connected to a single site wide network. Berol House and 2 Berol Yard should also be provided with a connection to the 2 Berol Yard energy centre. Please annotate that in the plans. **Energy – Green**	

The applicant has submitted a roof layout including the solar panels, other roofs will be used as amenity spaces. A 11.17kWp for dwellings are available in SAP calculation sheets, 19.9kWp for commercial. 30 degrees, 140m^2 on Berol Yard and 250m^2 on Berol House, output of 28.7MWh annually assumed in the assessment.
The applicant has agreed to amend the Solar Panel orientation to direct southward at the next design stage. A living roof has been proposed under the solar panels.

Energy – Be Seen
GLA Be Seen spreadsheet is submitted.

3. Carbon Offset Contribution

A carbon shortfall of 115 tCO_2/year remains. The remaining carbon emissions will need to be offset at £95/tCO_2 over 30 years.

A deferred carbon offset contribution mechanism will apply to this scheme as it is expected to connect to the DEN when this has been built. The applicant should present two carbon reduction table scenarios:

- Scenario 1: Connection to the DEN scenario (residual tCO_2 over 30 years)
- Scenario 2: Low-carbon alternative heating solution (residual tCO_2 over 30 years)

Action:

- Energy modelling of the two scenarios is needed to calculate the deferred carbon offset contribution. Please provide the energy modelling for these scenarios.

4. Overheating

The report has modelled 35 habitable rooms, 24 spaces and 2 corridors for the residential part of the development and 9 commercial spaces for the non-residential part.
Results are listed in the table below.

Residential:

	TM59 – criterion A (<3% hours	TM59 – criterion B hours	Number of habitable	Number of spaces	Number of

	of overheating)	>26°C (pass <33 hours)	rooms pass TM59	pass TM52	corridors pass
DSY1 2020s	100%	100%	35	24	2
DSY2 2020s	22%	0%	8	0	0
DSY3 2020s	11%	0%	4	0	0
DSY1 2050s	40%	0%	14	0	1
DSY1 2080s	11%	0%	4	0	0

All residential zones pass the overheating requirements for 2020s DSY1. In order to pass this, the following measures will be built:

- Natural ventilation, with windows fully opening inwards
- Infiltration rate of 0.15 ACH
- Glazing g-value of 0.40
- Dedicated shading elements introduced above some windows to block out direct solar gain on the south façade.
- Inset balconies for all flats to provide amenity space and shading.
- MVHR with summer bypass (40 l/s) for corridors.
- No active cooling

<u>Future weather files mitigation strategy:</u>

- External shutters.
- MVHR with summer boost bypass with a rate of 8l/s.
- 5kW MVHR cooling per flat.

<u>Non-residential:</u>

	TM59 – criterion A (<3% hours of overheating)	TM59 – criterion B hours >26°C (pass <33 hours)	Number of habitable rooms pass TM59	Number of spaces pass TM52	Number of corridors pass
DSY1 2020s	-	100%	-	9	-
DSY2 2020s	-	100%	-	9	-
DSY3 2020s	-	100%	-	9	-
DSY1 2050s	-	100%	-	9	-
DSY1 2080s	-	100%	-	9	-

All non-residential zones pass the overheating requirements. In order to pass this, the following measures were considered:

- Part F minimum ventilation rates.
- Active cooling system, electric chiller for overheated spaces.

Heat losses from the pipework is assumed to be 2W/m^2 in corridors and same ventilation strategy is used for all rooms for the assessment. No significant pollution risk is identified at the time of the assessment and the applicant confirms to re-evaluate it in line with guidance during future design stages.

The area weighted non-domestic cooling demand is 45.4 MJ/m^2 and Total non-domestic cooling demand is 342,983 MJ/Year. The applicant confirms Berkeley Square Development/Subsequent freeholder/building management company for the BTR homes will own the overheating risk post-occupancy.

The applicant confirms to develop a heatwave/building user guide to mitigate overheating risks for the occupants.

Overheating Actions:

- Considering the poor performance in future years, external shutters should be incorporated within this design, so the building is future proofed.

5. Sustainability

Intensive as well as extensive green roofs, standard trees, flower rick perennial plants, unplanted detention basins, permeable paving, sealed surfaces are proposed as urban greening and biodiversity enhancement measures.

Non-Domestic BREEAM Requirement

Policy SP4 requires all new non-residential developments to achieve a BREEAM rating 'Very Good' (or equivalent), although developments should aim to achieve 'Excellent' where achievable.

The applicant has prepared a BREEAM Pre-Assessment Report for the commercial units. Based on this report, a score of 57.5% is expected to be achieved, equivalent to 'Very Good' rating. A potential score of >65% could be achieved. Targeting such a low score will risk not achieving 'Very Good' as a very minimum and does not demonstrate the ambition to deliver a more sustainable development. It is recommended to aim for "excellent".

Whole Life-Cycle Carbon Assessments

The percentage assumption for the MEP was revised and B2-B3 were added in line with the GLA guidance. The revised total calculated emissions based on the GIA (without grid decarbonisation) is estimated at:

	Estimated carbon emissions	**GLA benchmark RESIDENTIAL**	**Embodied carbon rating (Industry-wide)**

Product & Construction Stages Modules A1-A5 (excl. sequestration)	414 $kgCO_2e/m^2$	Meets GLA benchmark (<850 $kgCO_2e/m^2$) but misses the aspirational target (<500 $kgCO_2e/m^2$).	Modules A1-A5 achieve a band rating of 'C', meeting the LETI 2020 Design Target.
Use and End-Of-Life Stages Modules B-C (excl. B6 and B7)	269 $kgCO_2e/m^2$	Meets GLA target (<350 $kgCO_2e/m^2$) and aspirational benchmark (<300 $kgCO_2e/m^2$).	
Modules A-C (excl B6, B7 and incl. sequestration)	658 $kgCO_2e/m^2$	Meets GLA target (<1200 $kgCO_2e/m^2$) and the aspirational benchmark (<800 $kgCO_2e/m^2$).	Modules A1-B5, C1-4 (incl sequestration) achieve a letter band rating of 'A', meeting the RIBA2030 Design Target.
Use and End-Of-Life Stages Modules B6 and B7	461 $kgCO_2e/m^2$	N/A- This is the Modules B6 and B7 only. The End of Life Stage (C1-4) figure is reported separately and is 40 $kgCO_2e/m^2$	
Reuse, Recovery, Recycling Stages Module D	-236.16$kgCO_2e/m^2$	N/A	

<u>The GLA requested further actions to be taken on whole-life carbon, which we support.</u>

Circular Economy

	<u>The GLA requested further actions to be taken on Circular Economy, which we support.</u> **Planning Obligations Heads of Terms** - Be Seen commitment to uploading energy data - Energy Plan - Sustainability Review - Estimated carbon offset contribution (and associated obligations)), plus a 10% management fee; carbon offset contribution to be re-calculated at £2,850 per tCO2 at the Energy Plan and Sustainability stages. - DEN connection (and associated obligations) - Heating strategy fall-back option if not connecting to the DEN **Planning Conditions** To be secured: <u>Energy strategy:</u> *The development hereby approved shall be constructed in accordance with the Energy Statement prepared by WSP (dated 9th November 2022) delivering a minimum 66.9% improvement on carbon emissions over 2013 Building Regulations Part L, with SAP10 emission factors, high fabric efficiencies, connection to the Decentralised Energy Network, and a minimum 31kWp solar photovoltaic (PV) array.* *(a) Prior to above ground construction, details of the Energy Strategy shall be submitted to and approved by the Local Planning Authority. This must include:* - *Carbon reduction following the energy hierarchy for future connection to DEN and Low-carbon Plan B scenario;* - *The applicant needs to achieve the following: (1) A combined DLF (for the offsite and onsite network) of 1.25, (2) this should assume the offsite DLF is 1.05 (and so the onsite network will have a DLF of 1.25/1/05-1/19); and (3) to certify that the combined DLF through the PCDB.* - *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 10% reduction with SAP10 carbon factors;* - *Details on what measures will be undertaken to make the retained listed buildings more energy efficient (what type of insulation, how the building will be made more airtight, etc).* - *Details to reduce thermal bridging;* - *Calculated Primary Energy Factor, Energy Use Intensity and space heating demand and its performance against GLA benchmarks for a similar use; submit the GLA's Carbon Emission Reporting Spreadsheet;* - *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;* - *Specification of any additional equipment installed to reduce carbon emissions;* - *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 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. *Reason: To ensure the development reduces its impact on climate change by reducing carbon emissions on site in compliance with the Energy Hierarchy, and in line with London Plan (2021) Policy SI2, and Local Plan (2017) Policies SP4 and DM22.* <u>DEN Connection:</u> *Prior to the above ground commencement of construction work, details relating to the future connection to the DEN must be submitted to and approved by the local planning authority. This shall include:* • *Further detail of how the developer will ensure the performance of the DEN system will be safeguarded through later stages of design (e.g. value engineering proposals by installers), construction and commissioning including provision of key information on system performance required by CoP1 (e.g. joint weld and HIU commissioning certificates, CoP1 checklists, etc.);* • *Peak heat load calculations in accordance with CIBSE CP1 Heat Networks: Code of Practice for the UK (2020) taking account of diversification.* • *Detail of the pipe design, pipe sizes and lengths (taking account of flow and return temperatures and diversification), insulation and calculated heat loss from the pipes in Watts, demonstrating heat losses have been minimised together with analysis of stress/expansion;* • *A before and after floor plan showing how the plant room can accommodate a heat substation for future DEN connection. The heat substation shall be sized to meet the peak heat load of the site. The drawings should cover details of the phasing including any plant that needs to be removed or relocated and access routes for installation of the heat substation;* • *Details of the route for the primary pipework from the energy centre to a point of connection at the site boundary including evidence that the point of connection is accessible by the area wide DEN, detailed proposals for installation for the route*	

	that shall be coordinated with existing and services, and plans and sections showing the route for three 100mm diameter communications ducts; • *Details of the route for connecting the non-residentials Berol House with the energy centre in 2 Berol Yard;* • *Details of the location for building entry including dimensions, isolation points, coordination with existing services and detail of flushing/seals;* • *Details of the location for the set down of a temporary plant to provide heat to the development in case of an interruption to the DEN supply including confirmation that the structural load bearing of the temporary boiler location is adequate for the temporary plant and identify the area/route available for a flue;* • *Details of a future pipework route from the temporary boiler location to the plant room.* *Reason: To ensure the development reduces its impact on climate change by reducing carbon emissions on site in compliance with the Energy Hierarchy, and in line with London Plan (2021) Policy SI2 and SI3, and Local Plan (2017) Policies SP4 and DM22.* <u>Overheating</u> *Prior to the above ground commencement of the development, revised Overheating Report shall be submitted to and approved by the Local Planning Authority. The submission shall assess the overheating risk and propose a retrofit plan. This assessment shall be based on the TM52 and TM59 Overheating modelling undertaken by WSP (Energy statement dated 9th November 2022).* *This report shall include:* - *Revised modelling of units modelled based on CIBSE TM52/59, 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 distribution heat losses, external shading, crime,*	

	noise and air quality issues are assessed and mitigated appropriately evidenced by the proposed location and specification of measures; - *Modelling of 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 that the retrofit measures can be integrated within the design (e.g., if there is space for pipework to allow the retrofitting of cooling and ventilation equipment), setting out mitigation measures in line with the Cooling Hierarchy;* - *Confirmation who will be responsible to mitigate the overheating risk once the development is occupied.* *(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:* - *Natural ventilation with fully inward openable windows;* - *Infiltration rate of 0.15 ACH* - *Window g-values of 0.4;* - *Mechanical ventilation with summer bypass (40l/s);* - *Hot water pipes insulated to high standards.* - *Any further mitigation measures including external shutters, as approved by or superseded by the latest approved Overheating Strategy.* *If the design of Blocks is amended, or the heat network pipes will result in higher heat losses and will impact on the overheating risk of any units, a revised Overheating Strategy must be submitted as part of the amendment application.*	

	REASON: In the interest of reducing the impacts of climate change, to enable the Local Planning Authority to assess overheating risk and to ensure that any necessary mitigation measures are implemented prior to construction, and maintained, in accordance with London Plan (2021) Policy SI4 and Local Plan (2017) Policies SP4 and DM21. <u>Overheating Building User Guide</u> *Prior to occupation of the residential dwellings, a Building User Guide for new residential occupants shall be submitted in writing to and for approval by the Local Planning Authority. The Building User Guide will advise residents how to operate their property during a heatwave, setting out a cooling hierarchy in accordance with London Plan (2021) Policy SI4 with passive measures being considered ahead of cooling systems. The Building User Guide will be issued to residential occupants upon first occupation.* *Reason: In the interest of reducing the impacts of climate change and mitigation of overheating risk, in accordance with London Plan (2021) Policy SI4, and Local Plan (2017) Policies SP4 and DM21.* <u>BREEAM Certificates</u> *(a) Prior to commencement on site, a design stage accreditation certificate for every type of non-residential category must be submitted to the Local Planning Authority confirming that the development will achieve a BREEAM "Very Good" outcome (or equivalent), aiming for "Excellent". This should be accompanied by a tracker demonstrating which credits are being targeted, and why other credits cannot be met on site.* *The development shall then be constructed in strict accordance with the details so approved, shall achieve the agreed rating and shall be maintained as such thereafter for the lifetime of the development.* *(b) Prior to occupation, a post-construction certificate issued by the Building Research Establishment must be submitted to the local authority for approval, confirming this standard has been achieved.*	

	In the event that the development fails to achieve the agreed rating for the development, a full schedule and costings of remedial works required to achieve this rating shall be submitted for our written approval with 2 months of the submission of the post construction certificate. Thereafter the schedule of remedial works must be implemented on site within 3 months of the Local Authority's approval of the schedule, or the full costs and management fees given to the Council for offsite remedial actions. *Reason: In the interest of addressing climate change and securing sustainable development in accordance with London Plan (2021) Policies SI2, SI3 and SI4, and Local Plan (2017) Policies SP4 and DM21.* <u>Living roof(s)</u> *(a) Prior to the above ground commencement of development, details of the living roofs must be submitted to and approved in writing by the Local Planning Authority. Living roofs must be planted with flowering species that provide amenity and biodiversity value at different times of year. Plants must be grown and sourced from the UK and all soils and compost used must be peat-free, to reduce the impact on climate change. The submission shall include:* *i) A roof plan identifying where the living roofs will be located;* *ii) A section demonstrating settled substrate levels of no less than 120mm for extensive living roofs (varying depths of 120-180mm), and no less than 250mm for intensive living roofs (including planters on amenity roof terraces);* *iii) Roof plans annotating details of the substrate: showing at least two substrate types across the roofs, annotating contours of the varying depths of substrate* *iv) Details of the proposed type of invertebrate habitat structures with a minimum of one feature per 30m^2 of living roof: substrate mounds and 0.5m high sandy piles in areas with the greatest structural support to provide a variation in habitat; semi-buried log piles / flat stones for invertebrates with a minimum footprint of 1m^2, rope coils, pebble mounds of water trays;* *v) Details on the range and seed spread of native species of (wild)flowers and herbs (minimum 10g/m^2) and density of plug plants planted (minimum 20/m^2 with root ball of plugs 25cm^3) to benefit native wildlife, suitable for the amount of direct*	

	sunshine/shading of the different living roof spaces. The living roofs will not rely on one species of plant life such as Sedum (which are not native); *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 roofs 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 roofs have been delivered in line with the details set out in point (a). This evidence shall include photographs demonstrating the measured depth of substrate, planting and biodiversity measures. If the Local Planning Authority finds that the living roofs have not been delivered to the approved standards, the applicant shall rectify this to ensure it complies with the condition. The living roofs shall be retained thereafter for the lifetime of the development in accordance with the approved management arrangements.* *Reason: To ensure that the development provides the maximum provision towards the creation of habitats for biodiversity and supports the water retention on site during rainfall. In accordance with London Plan (2021) Policies G1, G5, G6, SI1 and SI2 and Local Plan (2017) Policies SP4, SP5, SP11 and SP13.* <u>Circular Economy (Pre-Construction report, Post-Completion report)</u> *Prior to the occupation [of any phase / building/ development], a Post-Construction Monitoring Report should be completed in line with the GLA's Circular Economy Statement Guidance.* *The relevant Circular Economy Statement shall be submitted to the GLA at: circulareconomystatements@london.gov.uk, along with any supporting evidence as per the guidance. Confirmation of submission to the GLA shall be submitted to, and approved*	

	in writing by, the Local Planning Authority, prior to the occupation [of any phase / building/ development. *Reason: In the interests of sustainable waste management and in order to maximise the re-use of materials in accordance with London Plan (2021) Policies D3, SI2 and SI7, and Local Plan (2017) Policies SP4, SP6, and DM21.* <u>Whole-Life Carbon</u> *Prior to the occupation of each building, the post-construction tab of the GLA's Whole Life Carbon Assessment template should be completed in line with the GLA's Whole Life Carbon Assessment Guidance. The post-construction assessment should provide an update of the information submitted at planning submission stage. This should be submitted to the GLA at: ZeroCarbonPlanning@london.gov.uk, along with any supporting evidence as per the guidance. Confirmation of submission to the GLA shall be submitted to, and approved in writing by, the Local Planning Authority, prior to occupation of the relevant building.* *Reason: In the interests of sustainable development and to maximise on-site carbon dioxide savings in accordance with London Plan (2021) Policy SI2, and Local Plan (2017) Policies SP4 and DM21.* <u>Biodiversity</u> *(a) Prior to the commencement of development, details of ecological enhancement measures and ecological protection measures shall be submitted to and approved in writing by the Council. This shall detail the biodiversity net gain, plans showing the proposed location of ecological enhancement measures, a sensitive lighting scheme, justification for the location and type of enhancement measures by a qualified ecologist, and how the development will support and protect local wildlife and natural habitats.* *(b) Prior to the occupation of development, photographic evidence and a post-development ecological field survey and impact assessment shall be submitted to and approved by the Local Planning Authority to demonstrate the delivery of the ecological*	

	enhancement and protection measures is in accordance with the approved measures and in accordance with CIEEM standards. *Development shall accord with the details as approved and retained for the lifetime of the development.* *Reason: To ensure that the development provides the maximum provision towards the creation of habitats for biodiversity and the mitigation and adaptation of climate change. In accordance with London Plan (2021) Policies G1, G5, G6, SI1 and SI2 and Local Plan (2017) Policies SP4, SP5, SP11 and SP13.* --- **Carbon Management Response 16/05/2023** In preparing this consultation response, we have reviewed: • Energy Statement prepared by WSP (dated 9th November 2022) • Sustainability Statement prepared by WSP (dated November 2022) • Whole Life Cycle Carbon Assessment prepared by WSP (dated 8th November 2022) • Circular Economy Statement prepared by WSP (dated 5th December 2022) • Relevant supporting documents. **1. Summary** The development achieves a reduction of 66.9% carbon dioxide emissions on site, which is supported in principle. Some clarifications must be provided with regard to the Energy Strategy, and Overheating Strategy. Appropriate planning conditions will be recommended once this information has been provided. **2. Energy Strategy**	

Policy SP4 of the Local Plan Strategic Policies, requires all new development to be zero carbon (i.e. a 100% improvement beyond Part L (2013). The London Plan (2021) further confirms this in Policy SI2.

The overall predicted reduction in CO_2 emissions for the development shows an improvement of approximately 66.9% in carbon emissions with SAP10 carbon factors, from the Baseline development model (which is Part L 2013 compliant). This represents an annual saving of approximately 232.2 tonnes of CO_2 from a baseline of 347.2 tCO_2/year.

London Plan Policy SI2 requires major development proposals to calculate and minimise unregulated carbon emissions, not covered by Building Regulations. The calculated unregulated emissions are: 233.5/233.9 tCO_2.

Site-wide (SAP10 emission factors)

	Total regulated emissions (Tonnes CO_2 / year)	**CO_2 savings (Tonnes CO_2 / year)**	**Percentage savings (%)**
Part L 2013 Baseline	347.2		
Be Lean	289.7	57.5	16.6%
Be Clean	121.7	168	48.4%
Be Green	115	6.7	1.9%
Cumulative savings		232.2	66.9%
Carbon shortfall to offset (tCO_2)	115		
Carbon offset contribution	£95 x 30 years x 115 tCO_2/year = £327,750		
10% management fee	£32,775		

2 Berol Yard:

	Residential			Non-residential		
(SAP10 emission factors)	**Total regulated emissions (tCO_2/ year)**	**CO_2 savings (tCO_2 / year)**	**Percentage savings (%)**	**Total regulated emissions (tCO_2/ year)**	**CO_2 savings (tCO_2/ year)**	**Percentage savings (%)**
Part L 2013 Baseline	206.6			33.4		
Be Lean savings	184.8	21.8	10.6%	27.9	5.5	16.5%
Be Clean savings	41.5	143.3	69.3%	21.5	6.4	19.1%
Be Green savings	39.7	1.8	0.9%	21.5	0	0%
Cumulative savings		166.9	80.8%		65.2	35.6%
Carbon shortfall to offset (tCO_2)	39.7			21.5		

Berol House:

	Refurbishment (non-residential)			Extension (non-residential)		
(SAP10 emission factors)	**Total regulated emissions (tCO_2/ year)**	**CO_2 savings (tCO_2 / year)**	**Percentage savings (%)**	**Total regulated emissions (tCO_2/ year)**	**CO_2 savings (tCO_2/ year)**	**Percentage savings (%)**

Part L 2013 Baseline	68.8			38.3		
Be Lean savings	48.1	20.7	30.1%	28.9	9.4	24.5%
Be Clean savings	34.5	27.4	19.7%	24.2	4.7	12.4%
Be Green savings	34.5	0	0%	19.3	4.9	12.8%
Cumulative savings		48.1	49.8%		19	49.7%
Carbon shortfall to offset (tCO_2)	34.5			19.3		

Actions:

- The carbon reduction values for non-residential part- 2 Berol Yard, is inconsistent throughout the report ref. Table 5-5, 7-2, 8-3. Please amend and re-submit the energy report.
- Please submit the GLA's Carbon Emission Reporting Spreadsheet.
- Please justify how you have you modelled all representative dwelling type to capture all proposed dwelling types. Please submit SAP and BRUKL sheets for a representative selection of the development for the Baseline, Be Lean and Be Green scenarios.
- What is the calculated Primary Energy Factor?

Energy Use Intensity / Space Heating Demand

Applications are required to report on the total Energy Use Intensity and Space Heating Demand, in line with the GLA Energy Assessment Guidance (June 2022). The Energy Strategy should follow the reporting template set out in Table 5 of the guidance, including what methodology has been used. EUI is a measure of the total energy consumed

annually, but should exclude on-site renewable energy generation and energy use from electric vehicle charging.

Building type	**EUI (kWh/m^2/year)**	**Space Heating Demand (kWh/m^2/year)**	**Methodology used**

Actions:

- For all sections of the development including residential, non-residential, extension and refurbishment:
    - What is the calculated Energy Use Intensity (excluding renewable energy)? How does this perform against GLA benchmarks, i.e. at 35(resi), 65(school), 55(Office/Hotel) kWh/m2/year? Please submit the information in line with the GLA's reporting template.
    - What is the calculated space heating demand? How does this perform against the GLA benchmark of 15 kWh/m2/year? Please submit the information in line with the GLA's reporting template.

Energy – Lean

The applicant has proposed a saving of 57.5 tCO_2 in carbon emissions (17%) through improved energy efficiency standards in key elements of the build, based on SAP10 carbon factors. This goes beyond the minimum 10% and 15% reduction respectively set in London Plan Policy SI2, so this is supported.

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

New Build: 2 Berol Yard

	Residential	Commercial
Floor u-value	0.10 W/m^{2}K	0.11 W/m^{2}K
External wall u-value	0.15 W/m^{2}K	0.13 W/m^{2}K
Roof u-value	0.12 W/m^{2}K	0.11 W/m^{2}K

Door u-value	1.00 W/m^{2}K	1.00 W/m^{2}K
Window u-value	1.00 W/m^{2}K	1.00 W/m^{2}K
G-value	0.40	0.40
Air permeability rate	3 m^3/hm^2 @ 50Pa	3 m^3/hm^2 @ 50Pa
Ventilation strategy	Mechanical ventilation with heat recovery (MVHR 90% efficiency; 0.5 W/l/s Specific Fan Power)	Mechanical ventilation with heat recovery (MVHR 91% efficiency; 1.5 W/l/s Specific Fan Power)
Thermal bridging	Approved junction details	Default
Low energy lighting	100%	100%
Heating system (efficiency / emitter) Baseline only	93% gas boiler, radiators	Gas Boiler with 91%, fan coil units
Thermal mass	Medium	Medium
Improvement from the target fabric energy efficiency (TFEE)	15% improvement, from 43 to 36.6 kWh/year	N/A

<u>Refurbishment and Extension: Berol House</u>

	Refurbishment	Extension
Floor u-value	0.57 W/m^{2}K	0.13 W/m^{2}K
External wall u-value	1.72 W/m^{2}K	0.13 W/m^{2}K
Roof u-value	2.94 W/m^{2}K	0.11 W/m^{2}K
Door u-value	1.00 W/m^{2}K	1.00 W/m^{2}K
Window u-value	1.00 W/m^{2}K	1.00 W/m^{2}K
G-value	0.4	0.4
Air permeability rate	25 m^3/hm^2 @ 50Pa	3 m^3/hm^2 @ 50Pa
Ventilation strategy	Mechanical ventilation with heat recovery (MVHR 91%	Mechanical ventilation with heat recovery

	efficiency; 1.5 W/l/s Specific Fan Power)	(MVHR 91% efficiency; 1.5 W/l/s Specific Fan Power)
Low energy lighting	100%	100%
Heating system (efficiency / emitter) Be Lean only	200% with Fan Coil Units	Gas boiler 91% with Fan Coil Units
Thermal mass	Medium	Medium

<u>Actions:</u>

- Please clarify why 200% efficiency has been used for the heating system within the refurbished building for baseline and be lean calculation. A gas boiler with 84% efficiency should be used.
- Please identify on a plan where the MVHR units will be located within the dwellings. The units should be less than 2m away from external walls. This detail can also be conditioned.
- What is the proportion of glazed area? Consider following the LETI Climate Emergency Design Guide principles in façade design.
- Set out how the scheme's thermal bridging will be reduced. [if below 0.15, check how/why]. No measures are proposed to reduce heat loss from junction details, and it does not set out what the proposed Psi (Ψ) value is.
- Commercial including new build, and extension.
    - Submit the individual end use BER for specific end users in line w CIBSE Guide F.
- Refurbishments
    - Detail what measures will be undertaken to make the retained listed buildings more energy efficient (what type of insulation, how the building will be made more airtight, etc).

Overheating is dealt with in more detail below.

	Energy – Clean London Plan Policy SI3 calls for major development in Heat Network Priority Areas to have a communal low-temperature heating system, with the heat source selected from a hierarchy of options (with connecting to a local existing or planned heat network at the top). Policy DM22 of the Development Management Document supports proposals that contribute to the provision and use of Decentralised Energy Network (DEN) infrastructure. It requires developments incorporating site-wide communal energy systems to examine opportunities to extend these systems beyond the site boundary to supply energy to neighbouring existing and planned future developments. It requires developments to prioritise connection to existing or planned future DENs. The Be Clean strategy to connect to the DEN in Tottenham Hale is supported. However, an alternative strategy should be reported in case the DEN does not proceed or is costly. Some evidence should be provided that the DEN system was inputted into the SAP model and that the plant room is adequately sized for a substation. The proposed heating plant room is on a mezzanine on the north side of the building. The DEN pipe will access the site from Ashley Road in line with the Green Link - Ideally this would be • on the south side of the building • on the GF The applicant shall install a pipe from the edge of the site to the substation room at their cost (the route to be approved by the council and make sure it is not running through retail units where access is compromised) and so the heating plant room being on the north side is less of an issue. However, it is important that the heating plant is in the GH. The specification of the connection should comply with our specification which will ensure suitable access and will also secure a point of connection for emergency plant and several other things. The applicant will need to demonstrate that they will provide the following details prior to the commencement of construction:	

	e) Buried pipe (dry and filled with nitrogen) to our specification from the GF plant room to a manhole at the boundary of the site (the DEN pipe will access the site in GF from Ashley Road in line with the Green link) and evidence of any obstructions in highway adjacent to connection point; please note that the pipes cannot be running through retail units where access in compromised; f) A good quality network within the building – 60/40 F&R, <50W/dwelling losses from the network – ideally to an agreed standard in the S106; g) A clear plan for QA of the network post-design approval through to operation, based on CP1; h) A clear commercial strategy identifying who will sell energy to residents and how prices/quality of service will be set. <u>Actions:</u> - Please submit an alternative low-carbon strategy in case DEN doesn't proceed. A communal ASHP on the roof could be explored. This can include provisions to amend the scheme during construction if it were not required. - The non-residential space in Berol House and 2 Berol Yard should also be provided with a connection to the 2 Berol Yard energy centre. Please annotate that in the plans. - The report quotes two distribution loss factor (DLF) 1.2 and 1.3. Please amend this with a consistent value. A DLF of 1.25 would represent the combined DLF of DEN and the secondary network. **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 technologies. The report concludes that only solar photovoltaic (PV) is suitable for the proposed development with the district heat network in place to deliver the Be Green requirement. A total of 6.7tCO_2 (1.9%) reduction of emissions are proposed under Be Green measures.	

	The proposed roof mounted PV array would cover an area of 140m^2 and 250m^2 on the roof of 2 Berol Yard and Herol House respectively. <u>Actions:</u> - Please provide some commentary on how the available roof space has been maximised to install solar PV. Has your feasibility shown that other roofs will not be viable / will they be used for other purposes? - Please provide a detailed roof layout including the solar panels. - Please provide the capacity (kWp), total net area (m2) and annual output (kWh), assumed efficiency, angle and orientation of the proposed PV array.? - Why has a SE/SW orientation been assumed for PV when the plan below shows that the blocks have a direct southern orientation? - 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. **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. A public display of energy usage and generation should also be provided in the main entrance area to raise awareness of residents and businesses. <u>Action:</u> - Demonstrate that the planning stage energy performance data has been submitted to the GLA webform for this development: (<u>https://www.london.gov.uk/what-we-</u>	

	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 115 tCO_2/year remains. The remaining carbon emissions will need to be offset at £95/tCO_2 over 30 years. A deferred carbon offset contribution mechanism will apply to this scheme as it is expected to connect to the DEN when this has been built. The applicant should present two carbon reduction table scenarios: • Scenario 1: Connection to the DEN scenario (residual tCO_2 over 30 years) • Scenario 2: Low-carbon alternative heating solution (residual tCO_2 over 30 years) Action: - Energy modelling of the two scenarios is needed to calculate the deferred carbon offset contribution. Please provide the energy modelling for these scenarios. **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 for residential and TM52 for non-residential with TM49 weather files (London Weather Centre), and the cooling hierarchy has been followed in the design. It is unclear how many habitable rooms, homes/spaces and corridors have been modelled. Results are listed in the table below.	

Residential:

	TM59 – criterion A (<3% hours of overheating)	TM59 – criterion B hours >26°C (pass <33 hours)	Number of habitable rooms pass TM59	Number of spaces pass TM52	Number of corridors pass
DSY1 2020s	100%	100%			
DSY2 2020s	6%	6%			
DSY3 2020s	3%	3%			
DSY1 2050s	9%	9%			
DSY1 2080s	3%	3%			

All residential zones pass the overheating requirements for 2020s DSY1. In order to pass this, the following measures will be built:

- Natural ventilation, with windows fully opening inwards
- Infiltration rate of 0.15 ACH
- Glazing g-value of 0.40
- Dedicated shading elements introduced above some windows to block out direct solar gain on the south façade.
- Inset balconies for all flats to provide amenity space and shading.
- MVHR with summer bypass (40 l/s) for corridors.
- No active cooling

Future weather files mitigation strategy:

- External shutters.
- MVHR with summer boost bypass with a rate of 8l/s.

- 5kW MVHR cooling per flat.

Non-residential:

	TM59 – criterion A (<3% hours of overheating)	TM59 – criterion B hours >26°C (pass <33 hours)	Number of habitable rooms pass TM59	Number of spaces pass TM52	Number of corridors pass
DSY1 2020s	100%	100%			
DSY2 2020s	100%	100%			
DSY3 2020s	100%	100%			
DSY1 2050s	100%	100%			
DSY1 2080s	100%	100%			

All non-residential zones pass the overheating requirements. In order to pass this, the following measures were considered:

- Part F minimum ventilation rates.
- Active cooling system, electric chiller for overheated spaces.

Overheating Actions:

- It is unclear how many habitable rooms, homes/spaces and corridors have been modelled and how many of them pass against the criteria. Report the results for all rooms, spaces, and corridors in a table that is colour coded and clearly sets out the maximum hours above criteria A and B in order to pass the requirement, and a summary of the number of rooms/spaces that pass.

	- Please perform overheating assessment for the refurbishment and extension part of the development. - Set out the heat losses from pipework and heat interface units for community heating systems. - Properly clarify which rooms have been modelled. - Show which habitable spaces will be predominantly naturally ventilated or mechanically ventilated in the floor plans. - Confirm that the habitable rooms facing the main road are not subject to adverse noise or air pollution. Specify the strategy to overcome any risk of crime or adverse air/noise pollution that will impact whether occupants can rely on natural ventilation, in line with the AVO Residential Design Guide. This should include specification of adapted windows and elevations demonstrating where these will be installed. - Considering the poor performance in future years, external shutters should be incorporated within this design, so the building is future proofed. - Please confirm and if not modelled undertake further modelling for new build, extension and refurbished part of the development. Then, report for all rooms and spaces for the following: o Model the 2020s DSY 2 and 3 and DSY1 for the 2050s and 20280s. Ensure the design has incorporated as many mitigation measures to pass these more extreme and future weather files as far as feasible. Any remaining overheating risk should inform the future retrofit plan. o All single-aspect rooms facing west, east, and south; o At least 50% of rooms on the top floor; o 75% of all modelled rooms facing South or South/West; o Rooms closest to any significant noise and / or air pollution source, with windows closed at all times (with cross reference to the Noise and the Air Quality Assessments to demonstrate the most sensitive receptors and the AVO Residential Design Guide); o Habitable communal spaces; o Communal corridors, where pipework runs through;	

	○ Commercial/office areas, particularly where they will be occupied for a longer period of time. Assuming that active cooling will be provided is not sufficient. If the proposed uses are not yet clear, this aspect can be conditioned to ensure that the modelling is based on the potential future occupiers.; - Specify the active cooling demand (space cooling, not energy used) on an area-weighted average in MJ/m^2 and MY/year? Please also confirm the efficiency of the equipment, whether the air is sourced from the coolest point or any renewable sources. - Confirm who will own the overheating risk when the building is occupied (not the residents). - This development should have a heatwave plan/building user guide to mitigate overheating risk for occupants. **5. Sustainability** Policy DM21 of the Development Management Document requires developments to demonstrate sustainable design, layout and construction techniques. The sustainability section in the report sets out the proposed measures to improve the sustainability of the scheme, including transport and access, materials and waste, water consumption, flood risk and drainage, biodiversity, climate resilience, energy, CO_2 emission and pollution management. <u>Action:</u> - 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.) - What electric vehicle charging points are proposed? This allows the future-proofing of the dwelling/development by ensuring the required power has been installed. ***Non-Domestic BREEAM Requirement***	

	Policy SP4 requires all new non-residential developments to achieve a BREEAM rating 'Very Good' (or equivalent), although developments should aim to achieve 'Excellent' where achievable. The applicant has prepared a BREEAM Pre-Assessment Report for the commercial units. Based on this report, a score of 57.5% is expected to be achieved, equivalent to 'Very Good' rating. A potential score of >65% could be achieved. Targeting such a low score will risk not achieving 'Very Good' as a very minimum and does not demonstrate the ambition to deliver a more sustainable development. <u>Actions:</u> - The submitted score is not good enough and a potential score of more than 65% could be achieved. Please explore ways achieve this and re-submit the BREEAM pre-assessment report. - Submit the BREEAM pre-assessment for refurbishment and extension too. - Along with the graph, 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 (where they are available under the Shell and Core assessment). This will enable better assessment of which credits. ***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 development achieves an Urban Greening Factor of 0.32, which complies with the interim minimum target of 0.3 for predominantly non-residential developments in London Plan Policy G5.

Living roofs

All development sites must incorporate urban greening within their fundamental design, in line with London Plan Policy G5.

The development is proposing living roofs in the development. All landscaping proposals and living roofs should stimulate a variety of planting species. Mat-based, sedum systems are discouraged as they retain less rainfall and deliver limited biodiversity advantages. The growing medium for extensive roofs must be 120-150mm deep, and at least 250mm deep for intensive roofs (these are often roof-level amenity spaces) to ensure most plant species can establish and thrive and can withstand periods of drought. Living walls should be rooted in the ground with sufficient substrate depth.

Living roofs are supported in principle, subject to detailed design. Details for living roofs will need to be submitted as part of a planning condition.

Whole Life-Cycle Carbon Assessments

Policy SI2 requires developments referable to the Mayor of London to submit a Whole Life-Cycle Carbon Assessment and demonstrate actions undertaken to reduce life-cycle emissions.

The total calculated emissions based on the GIA (without grid decarbonisation) is estimated at:

	Estimated carbon emissions	**GLA benchmark RESIDENTIAL**	**Embodied carbon rating (Industry-wide)**
Product & Construction	495 $kgCO_2e/m^2$	Meets GLA benchmark (<850 $kgCO_2e/m^2$) but	Modules A1-A5 achieve a band

Stages Modules A1-A5 (excl. sequestration)		misses the aspirational target (<500 $kgCO_2e/m^2$).	rating of 'C', meeting the LETI 2020 Design Target.
Use and End-Of-Life Stages Modules B-C (excl. B6 and B7)	377 $kgCO_2e/m^2$	Does not meet GLA target (<350 $kgCO_2e/m^2$) and aspirational benchmark (<300 $kgCO_2e/m^2$).	
Modules A-C (excl B6, B7 and incl. sequestration)	846 $kgCO_2e/m^2$	Meets GLA target (<1200 $kgCO_2e/m^2$) and the aspirational benchmark (<800 $kgCO_2e/m^2$).	Modules A1-B5, C1-4 (incl sequestration) achieve a letter band rating of 'C', not meeting the LETI2020 Design Target.
Use and End-Of-Life Stages Modules B6 and B7	1046$kgCO_2e/m^2$	N/A	
Reuse, Recovery, Recycling Stages Module D	-245.3$kgCO_2e/m^2$	N/A	

The largest contributor to the building's WLC are the A1-A3 materials, accounting for approximately 53% of emissions. The majority of A1-A3 emissions are associated with the concrete, structural steel and rebar. Material replacement (B4) was the second largest contributor with 35.7% WLC emissions. A number of areas have been identified to

	calculate more accurately and opportunities to reduce the embodied carbon of the buildings. <u>Actions:</u> - Please take necessary actions to meet the GLA embodied carbon targets. Potentially through pre-commencement condition - The GLA requested further actions to be taken on whole-life carbon, which we support. ***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. The principles used for this development are: - Building in layers- ensuring that different parts of the building are accessible and can be maintained and replaced where necessary. - Design out waste - Designing for longevity, circa 50 years of building life, and disassembly at end of life - Designing for flexibility and adaptability - Minimise operational waste and provide adequate space for recycling The circular economy statement includes Bills of Materials (Appendix A), Pre-redevelopment audit (Appendix B), Operational Waste Management (Appendix C), and Lean Design Options and Design for disassembly (Appendix D). This is a fairly high level of information, and the applicant expects this to become more detailed as the detailed design progresses following permission. <u>The GLA requested further actions to be taken on Circular Economy, which we support.</u>	

LBH Conservation Officer	The proposed development comprising the refurbishment and extension of locally listed Berol House and the erection of an adjacent new building at 2 Berol Yard, sits in the south-eastern corner of the Ashley Road South Master Plan. The Hale has been over the last years a fast-changing part of the borough defined to the east by the River Lea valley with its open landscape, walkways, recreation spaces and wetland, and is bound to the west by Markfield park and the historic urban corridor of Tottenham High Road. The townscape character of the Hale has been so far very fragmented and has been defined by surviving Victorian and Edwardian residential streets, post-war estates, later infill developments, industrial and business buildings, railway line, now gradually complemented by emerging new high-rise developments that, together with their new private and public spaces and landscape design, are progressively reconfiguring this eastern part of the borough. Compatibly with the local interest of Berol House as industrial heritage, and its low susceptibility to change, alterations to the locally listed building and fundamental change to its setting have been accepted in principle as part of the much needed regeneration of the area, and accordingly, a two storey extension to Berol House, as well as redevelopment of the site at 2 Berol Yard, were previously consented together with the recently completed Gessner development and other emerging tall buildings which are contributing to the new, contemporary and more enclosed character of the area. Within this frame, the proposed refurbishment and three storey roof extension to Berol House, to provide office uses and an external terrace, constitutes an opportunity to sustainably retain, enhance and put into beneficial use the locally listed building while carefully reconfiguring it within its emerging new context. The building will be provided with new entrances and new internal route at ground level to improve permeability and will host retail and commercial uses at ground and first floor thus offering a more active frontage to Ashley Road.	Comments noted.

	The proposed additional two storeys will be sympathetically clad in terracotta tiles with dark power coated frames and detailing and will be crowned by a further, setback, top floor with double glazed curtain walling that will positively complement and improve the design of the host building and will sustain its use. The extended Berol House will be adjoined to the east, where there is currently a car park, by the new 30 storey development at 2 Berol Yard which includes residential uses, community and indoor amenity space with a podium garden, retail ground level to the south and west sides, whereas car and cycle parking and landscaping will complement the north and east sides of the site. The urban regeneration of this area will rest on a careful and integrated reconfiguration of buildings and places, such as the new pedestrian link 'Berol Walk' with trees connecting Berol House and 2 Berol Yard with The Gessner and One Ashley Road, or the new 'Gessner Lane' to the north, or the new public space designed to the south of Berol House and 2 Berol Yard that will host a winter garden until when it will connect in the future to a bridge link across Watermead Way as part of the masterplan aspiration to connect the Lea valley and Tottenham High Road. The mass and forms of 2 Berol Yard have been carefully articulated and will gradually step up in height in such a way to address its local and wider context and while including a podium garden fronting Watermead Way and Gessner Lane, plus further amenity space on the upper floors and roof level. The proposed scheme will altogether contribute to define the new urban character of the area through both the creation of a tall building on the existing car park backing Berol House and by conserving the built memory of the historic industrial use of the area as exemplified by Berol house. The re-design and extension of Berol House respects and complements the industrial heritage character of the host building while providing distinctive and well- composed improvements to the host building. The new building at 2 Berol Yard building would successfully complement both the existing and emerging	

	context through its articulated elevations, materials and variations in height that would help to break up the scale and form of the building and would frame, together with Berol House, new public spaces, and pedestrian routes. The new public realm would benefit from high quality finishes and hard and soft landscaping. The new frontages and uses proposed to ground floor will provide increased activity and visual interest with an overall positive effect on the townscape character of the development site and on the setting of the locally listed Berol House. The comprehensive townscape visual assessment supporting the application provides a clear understanding of the changing character of The Hale as experienced in the background of views across and out of Alexandra Palace Park, South Tottenham CA and Markfield park. The visual impact views include the cumulative schemes located within Tottenham Hale East as will be seen, among others, in views taken from various viewpoints along the Bruce Grove and Tottenham Green conservation areas along the Tottenham historic corridor. It is evident that there is already an ongoing high degree of change in scale and built form in the background of those views taken across the Tottenham Conservation areas and looking towards the Tottenham Hale station, and the transformation of this area is due to continue. However, the proposed development would only be visible in the far background of the views across and out of the conservation areas and related heritage assets as part of a group of tall new elements of various heights and taller built forms such as the Millstream Tower, will be more prominent than the proposed development in some of these views, and particularly in the winter. In views along Bruce Grove, where taller buildings are already characteristic of the wider townscape, the proposed development would be seen without harm in the context of historic townscape elements in the foreground. In the long range views the new development would have a slender profile, stepping form and varied materials it would create a coherent cluster of tall buildings and a clear focal point in the townscape thus reinforcing the location of Tottenham Hale station.	

	The 2 Berol Yard building would signpost, in conjunction with an emerging townscape of taller buildings around Tottenham Hale, the new urban character and spatial hierarchy of the area, where the proposed development would become part of a new, varied skyline that will define Tottenham Hale town centre through a 'wave' skyline profile as envisaged in the council vision for the area. The proposed development would very positively retain the locally listed Berol House, would conserve, and unveil its heritage significance and would improve the urban quality of its setting, without any negative impact on the legibility, primacy, and significance of other heritage assets in the borough, and while delivering much needed improvements to the urban character of its locality. The proposed development is supported from the conservation perspective.	
LBH Design Officer	**Summary** These proposals form one of the last jig-saw pieces in the ambitious high-density redevelopment of the north side of the Tottenham Hale transport interchange, transforming it from a beleaguered, windswept, traffic dominated isolated place of no character, to a dynamic, vibrant new town centre. In particular, in what they propose to do to Berol House, there should be a beautiful, elegant historic building at the heart of this new town centre, with a properly enlivened active frontage to all sides and the mix of workspaces and retail offers to provide for life, whilst the Berol Yard tower should aid in wayfinding, act as a marker to the Green Link, help provide the crucial bridge over the road and railway for that Green Link, tying it into the burgeoning community and wider assets. In addition, this site promises to provide a significantly increased number of much needed now homes, to high quality designs and amenity standards, with innovative amenity spaces and community facilities, yet with the superb access to existing nearby parkland and facilities that all developments in Tottenham Hale benefit from. And the proposed tower will be an elegant, interestingly composed, sculptural landmark, that responds creatively yet contextually to its surroundings and the emerging cluster of brick-based, high-rise, vibrant and distinctive buildings. **Principal of Development, Planning Policy Context and Masterplanning**	Comments noted.

	1. This proposal represents one of the last developments envisaged in the Tottenham Hale District Centre Framework (DCF; adopted by the Council, November 2015, further adopted as planning policy in the Tottenham Area Action Plan DPD, July 2017), that envisaged the transformation of the heart of Tottenham Hale into a high-rise, high-density new district centre clustered tightly around the transport interchange. Tottenham Hale is earmarked by the GLA to deliver 1,965 homes and is a Tall Building Growth Area and a Local Employment Area: Regeneration Area. 2. Specifically, this application is to replace previous permissions as part of a large masterplanned development known as Ashley Road South, by this developer in conjunction with the housing association Notting Hill Genesis. Ashley Road is the main existing north-south local street, and their original masterplan covered a large area of mostly industrial land either side of Ashley Road, between Down Lane Park to the north & west, Watermead Way to the east and a number of neighbouring landholdings to the south, most of which subsequently became the Argent Related development of five high-density, high-rise, mixed use blocks. 3. Crucially however, the council envisages a new east-west "Green Link" here; as enshrined in the AAP & DCF, this is intended to provide a direct and attractive pedestrian route linking Tottenham High Road, through the new Tottenham Hale town centre, to the Lee Valley Park to the east. It will require new bridges and crossings across roads, railways and watercourses, as well as new routes, acting as linear parks, through developments, but many stretches have already been secured including routes through the Hale Village and Hale Wharf development and bridges across Pymme's Brook, the Lee Navigation and a flood relief channel, all close to the east of this site, and conversion of Chesnut Road into a linear park to the west. This site will sit at a crucial point, where a pedestrian bridge over the dual carriageway of Watermead Way and the railway should take off. 4. The joint developers' masterplan, by architects John McAslan & Partners, was to retain one existing building, Berol House, a locally listed, four storey, brick, former pencil factory on the east side of Ashley Road. Between Berol House and Watermead Way, there was to have been a new further education college, which was designed in detail to an award-winning design, before unfortunately the original end user pulled out. The rest of the development was to be a series of medium to high	

rise residential blocks, generally with employment and town centre uses on parts of their ground and first floors. Two separate applications were made and granted, one for each landholding; for Berkeley Square, HGFY/2017/2044. Their residential blocks, The Gessner, immediately north of the college site and east of Berol House, as well as two blocks west of Ashley Road, have now been completed.

5. This proposal is therefore to replace the proposed college, and complete Berkeley Square's part of the Ashley Road South masterplan, but in a significantly modified form. The proposals make minor detailed modifications to the use and appearance of Berol House, which seek to strengthen its intended role as the heart of the new town centre and replace the intended college with a new tall building; both of these are discussed in detail in the relevant sections below.
6. It is within the site allocation Ashley Road South for the creation of an employment-led mixed-use quarter, creation of a new east-west route linking Down Lane Park and Hale Village, enhanced public realm and residential use. Berol House is a Locally Listed Buildings, but there are no designated or undesignated heritage assets in the immediate vicinity. The Conservation Officer has provided detailed heritage advice on this application.

Street Layout

7. The proposals do not radically change the street layout from that previously approved and to a considerable extent already emergent, but do make improvements, increasing the likely legibility and vibrancy of the streets and footways around and across the site and improving the site's contribution to wider street patterns and legibility. In particular active frontages are considerably increased in both the existing Berol House and new Berol Yard. There will be much greater definition of the space between the two, which will be pedestrian only and have active retail frontages to both sides, and about which the applicant's architects have thought carefully about the proportions, so that it will match those of successful streets, and which therefore promises to be a vibrant street, Berol Walk, containing street trees and outdoor seating, spilling out form the retail units.
8. Berol Walk will meet the east-west Green Link at a new small square, where the main residential entrance will be located, as well as the foot of the public stairs and a balcony looking down onto the square from the proposed first floor community

	facility. The square will provide a “moment” on the Green Link, a pint of puncture, as well as an opportunity to reorientate. The green link will proceed east and west as another tree lined pedestrian street, wider in its short western link to where it will form a key crossroads with Ashley Road, allowing the attractive, distinctive and historic gable end wall to Berol House to be appreciated, and eastwards to Watermead Way as a narrower pedestrian street more related to the neighbouring Argent development. 9. Streets form the main public realm creation of this proposal, and they are not lavishly landscaped with much greenery, but this is an urban location, and it is appropriate that the streets proposed will be of very high quality but predominantly hard paved materials. The proposals still include a significant provision of new street trees, along both the Green Link and Berol Walk, as well as street furniture and opportunities in the new square for art and seasonal installations (such as a Christmas Tree). It is also very impressive that they have come up with such a robust and simple external public landscape proposal, without extraneous clutter. There will also be a lot of green landscaping in the many green roof terraces, both accessible to residents/workers and for biodiversity only, on both buildings, with all of the play provision required for under 5s and 5-11s in the residential building provided on the podium gardens. 10. But the most important contribution this proposal makes to street layout is the contribution it makes to furthering development of the East-West Green Link, through an improved east-west street along the southern edge of their site and through provision of stairs, lifts and a financial contribution for the bridge over Watermead Way and the railway. The bridge is a crucial part of the long planned green link, connecting this and other major developments in Ashley Road and west to the waterside spaces and parkland of the Lee Valley, including Tottenham Marshes, The Baddock and Walthamstow Wetlands, free of traffic, and connecting those spaces and developments east of the railway into this new town centre, to the established (& soon to be improved) Down Lane Park and beyond to the established vibrant historic high street of Tottenham High Road. The height of this development will provide a visual marker for the green link and its bridge, which is part of the justification for its height, as well as seamlessly incorporating the necessary stairs and lift, to	

	generously proportion and clear, simple, legible, secure and decidedly grand form, so that in future the bridge need only land at this landing. To provide an immediate function for the stairs and lift, although intended to carry on after the bridge completion, a new community room is proposed off the landing; available to hire for societies, celebrations and functions. The s105 and CIL moneys raised in this development will also contribute to the delivery of the bridge itself, including sufficient funding to allow an immediate commitment to an early feasibility study. **Height, including Tall Buildings** 11. The heights proposed follow the strategy of the District Centre Framework, previous approval and approvals on neighbouring sites, but substantially increase the new Berol Yard residential building to 32 floors, compared to 8 , admittedly taller floors for the previously planned college, whilst the height of Berol House remains at 6 storeys. Housing targets and expectations of density have increased since those previous approvals, and active travel and public transport improvements have been or are being delivered, particularly the new station entrance, extra track and platform, and segregated cycle lanes on Ashley Road and Watermead Way. But the main justification for the significant height increase is in landmark creation for wayfinding, reanalysis of the tall building cluster, and the quality of architectural and landscape design. The tall building will be embedded within a podium and shoulder blocks, tying them into the wider grain and street pattern, and mitigating their scale, wind, daylight and sunlight effects. 12. Considering each criterion from Haringey's tall building policy is set in SP11 of our Strategic Polices DPD (adopted 2013 (with alterations 2017) and DM6 of our Development Management DPD (adopted 2017), skipping the 3rd & 4th bullets from the Strategic Policies, that reference the other document and the document used in preparing DM6: • The site is within the areas of both the adopted Tottenham AAP and the adopted District Centre Framework. Both support the principle of tall buildings in this location. The adopted District Centre Framework established in 2014 a principle that it would be acceptable to have a "wave" of height, with a cluster of the tallest buildings in Tottenham Hale around the station, dropping immediately away before rising somewhat and then dropping gradually down	

	to the existing retained hinterland. So the tallest building in the Argent Related development, at 38 storeys, is on the west side of the station square, whilst they then drop to 10-16 storeys, before rising to 20 storeys on the Welbourne site (& recently approved separate student housing). Similarly Hale Works at 34, dropping to 8-10 in Hale Village, then in the 20s fat Hale Wharf to the east. It was not initially identified that there would be quite the same wave to the north, but Argent's northern sites, The Gessner and the unbuilt but approved Notting Hill Genesis plot to its north are all medium-tall at over 15-20 storeys. This 32-storey tower at Berol Yard will relate to Argent's tallest and Hale Works as a triangle of well-spaced tall buildings, straddling and pinpointing the station, with its shoulder elements relating to the medium-tall neighbours and lower shoulder to Berol House, the mansion blocks to the west and lower elements of Argent and The Gessner. As such it can be seen as a reasonable adaption to the flexible but still coherent three-dimensional design of the Tottenham Hale tall buildings cluster; • The council prepared a borough-wide Urban Characterisation Study in 2016, which supported tall buildings in this location, beside the railway edge, well away from the historic heart of Tottenham or an pre-existing residential neighbourhoods, close to but not right on the edge of the large extensive open spaces of the Lee Valley, and marking the major transport interchange and emerging new town centre; • High quality design especially of public realm is promised in the proposals, as described in other sections above and below; • It will be capable of being considered a "Landmark" by being a wayfinder or marker for the East-West Green Link, location of the bridge, and the heart of the new town centre. The bridge in particular is identified in the QRP comments as providing particular justification for locating a tall building precisely here; • It should also be capable of being considered a "Landmark" by being elegant, well-proportioned, and visually interesting when viewed from any direction, by virtue of its particular, "clustered" design of distinct angled fragments. This is described more fully below, but the different fragments are designed to relate	

to their different context; lower ones to immediate neighbours, with matching brick colours and angles of façade, whilst taller fragments relate more to their longer views to the marshes and to central London;

- Consideration of impact on ecology and microclimate encompasses daylight, sunlight, and wind, examined in detail below, but this includes how the fragments and podium break up down draft and the angles of the taller fragments allow continued day and sunlight access to immediate neighbours including The Gessner. Impact on ecology could also include impact on the flight of birds and other flying creatures, but this proposal is not immediately adjacent to open countryside, a large open space or open waterway;
- And the urban design analysis and 3d model views of their proposal satisfactorily shows that the tower could be a successful and elegant landmark, contributing to the planned cluster of tall buildings.

Local, Wider & Strategic Views

13. The development forms part of an emerging cluster of tall buildings, including taller buildings than this developer has already permitted, under construction and already completed, around Tottenham Hale. London and Borough Strategic View Corridors all happen to be distant from this development, and therefore are not considered to be affected by this development.
14. Given the number of other tall buildings already approved (including some now built) in the cluster immediately around this site, there would probably be no locations where this proposal would be visible but there are currently or approved no other tall buildings visible. Nevertheless, following consultation between the applicants and officers, a number of close and distant views of the proposals have been produced, in each case including a version at the time of assessment and with the "cumulative impact" from other approved bus unbuilt or unfinished buildings collaged in. Furthermore, discussions between officers and the applicants have resulted in a number of improvements and corrections to those views, so that officers can now confidently confirm that they accurately show the townscape and visual impact of this proposal.
15. The applicants most recent and accurate views demonstrate that this proposal will sit within the cluster of built, under construction and planned all buildings marking the

centre of Tottenham Hale. It will not stand out but will sit assertively as one of the tallest buildings around the station square, also marking the green link and bridge. As such it will contribute appropriately to the legibility and distinctiveness of this important emerging centre and help make the cluster attractive and appealing in longer, medium and local views.

16. As the two proposed buildings are distinctly separate in the site layout and designed by different architects, I will deal with each separately, starting with Berol House, the retained and to be extended existing building, which is relatively straightforward, followed by 2 Berol Yard, which will be split into sections for each particular subject.

Detailed Design of Berol House

17. The architects for this, McAslans, designed the originally approved scheme for Berol House, and have now modified those proposals to suit the changes in this new application. Previously, the existing Berol House structure was to be upgraded for continued employment use, with a two-floor rooftop extension to contain new housing. Under this proposal, the proposed rooftop extension is to also be in employment use, and has been increased moderately, with a part third additional floor to the centre of the plan, whilst the ground floor is to be in town centre uses such as retail.
18. The detailed design of the additional floors, which was already considered acceptable, has been improved, with a more elegant cladding and fenestration pattern, with a terracotta frame to the two whole additional floors, with glazing between, coordinated with the rhythm and proportions to the existing floors, and with the third additional floor, which is significantly drawn in from the northern and southern ends, predominantly glazed. This amended design for the additional floors will be at least as elegant as the high-quality design previously approved.
19. The change to proposed uses on the ground floor is accompanied by significant design changes, creating more openings, and making pretty much all of the ground floor active frontage. The public cut-through about 2/3 of the way up the block is retained but relocated to the centre of the block, more appropriately using the arched openings under the central pediment, and this is where the main entrance to the stairs and lifts to the upper floors, which are now to be internal rather than in external glass boxes, are relocated. Ground floor units will have the ability to open to both

	sides. This should enable Berol House to make an improved contribution to a busy, lively, vibrant heart of the new Tottenham Hale Town Centre and celebrate its historic role. **Detailed Design of Berol Yard (the new-build residential tower)** **Architectural Expression, Fenestration & Materiality** 20. This is proposed to be a sophisticated composition of a series of rectilinear "fragments", rising up gradually to greater heights as their angles shift off the street grid, out of a square podium that fills the plot, giving the surrounding streets a human scaled sense of enclosure. The lowest block, in the south-eastern corner, aligns with the east-west Green Link and houses its stair, lift and community facility, whilst its height aligns with Berol House and the lower shoulders of the neighbouring Argent and other blocks. The second fragment is angled to face and address the proposed square, off which it is set back behind a 2nd floor podium, and main approach from the Ashley Road–Green Link crossroads and aligns in height with the medium-tall blocks. The third fragment faces west across the rooftops towards Tottenham High Road, again set-back behind a wider podium from Berol Lane. The fourth is angled away from the north side to face north-east across Tottenham Marshes and open up the side of The Gessner. The fifth faces south-east across the lower Lee Valley and Walthamstow Wetlands, with only the core rising slightly higher. This should be a truly interesting and appealing three-dimensional composition. 21. Materiality responds to the different fragments and their differing relationships. Brick colours relate to the buildings they face, whilst the tones get lighter as their height increases, so that the lowest block will be a unique dark green brick relating to the Green Link, the second fragment a darker red relating to the Argent building opposite it, the third a red-buff relating to Berol House, the fourth a lighter grey-brown relating to The Gessner and the fifth a light pink buff, with the core where it rises above being a darker material uniting the composition. 22. The fenestration pattern is of orderly, gridded facades of identical rectangular window openings, with the modelling providing interest, but fenestration varies where the columns of larger balcony openings occur and most of all at the top floor with the larger still openings for the communal facilities. The window design may be repetitive though, but it is an exceptionally carefully designed window, based on the classic	

	"Chicago" window of a larger central pane with two narrower side panes, enlivened by louvres and sun shading relating to function and aspect to avoid overheating and allow flexible opening options to provide good daylight and ventilation levels without being difficult to use. 23. The overall architectural approach, especially the gridded facades and use of brick, will also match the other new high and lower rise buildings making up this vibrant new town centre at Tottenham Hale. **Residential Quality (flat, room & private amenity space shape, size, quality and aspect)** 24. The proposals are for a mixture of different flat sizes from studios to three-bedroom, both affordable (33%) and market value, with 10% wheelchair adaptable. All flat and room sizes comply with or exceed minima defined in the Nationally Described Space Standards, as is to be routinely expected. Flats are designed to be attractive and usable to modern taste, with plentiful storage and open plan living-dining-kitchen generally with the kitchen area recessed. 25. All dwellings meet or exceed the private external amenity space in the London Plan, with generous, recessed private balconies. Privacy of lower floor balconies is achieved by being recessed and having at least partially solid balustrades. All flats (regardless of tenure) benefit as well from access to the large podium garden on the east side at second floor, the large, south facing, "Mediterranean Garden" roof terrace on the 18th floor and communal amenity room and two communal balconies off that on the 30th floor, exploiting the design which permits roof terraces in the steps in the blocks. 26. 67% of the proposed flats are dual aspect, by virtue of the design of "fragments" creating up to seven corner flats per floor, and the angling of the fragments ensures that there are no north facing single aspect flats. This is a very high proportion of dual aspect for a larger tall building. **Daylight, Sunlight and Wind Microclimate** 27. The applicants provided Daylight and Sunlight Reports on levels within their development and the effect of their proposals on relevant neighbouring buildings, prepared 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, 2022), known as "The BRE Guide". 28. These assessments show a good level of daylight and sunlight to the proposed dwellings, with 94% of habitable rooms in the proposed development meeting or exceeding the daylight levels recommended in the BRE Guide (where the living room level is taken for combined living-dining-kitchens) for average daylight factor (ADF) and 90% for daylight distribution (DD). Sunlight levels are a less impressive 54%, but this reflects the new guidance, which only came in during the design process, changing the criteria, and the significant number of flats in this proposal facing east, north-east or west, having less access to sunlight. 29. Regarding the proposals' effect on existing neighbouring buildings, those under construction and those with planning permission but not yet started, there are some impacts. Many of these impacts can be understood as being due to this site being currently undeveloped, so the neighbours achieve a much higher level of daylight than would reasonably be expected, although assessment comparing this proposal to the day and sunlight effect of the previously approved college shows there is still a noticeable loss in many cases, albeit much reduced. It should also be noted that many of the neighbours assessed are not yet inhabited, being under construction or merely planned, so residents will never experience the better day and sunlight levels without this development, or not for very long. 30. In the case of higher density developments, and this is one of the places in London of the highest density, it should 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. In particular, the 27% VSC recommended guideline is based on a low-density suburban housing model and in an urban environment it is recognised that VSC values in excess of 20% are considered as reasonably good, and that VSC values in the mid-teens are deemed acceptable. Paragraph 2.3.29 of the GLA Housing SPD supports this view as it acknowledges that natural light can be restricted in densely developed parts of the city. Therefore, full or near full compliance with the BRE Guide is not to be expected.	

	31. To assess the impact of the proposals on wind microclimate, the applicants carried out wind tunnel testing of a physical model and measured the findings against long term wind statistics applicable to the site, in accordance with the industry standard "Lawson" criteria. Their assessment has been checked by the council's own consultants and this response should be referred to.	
LBH Local Lead Flood Authority/Drainage	<u>Comments 02/05/2023:</u> Based on the details provided within the email dated 21 April 2023 I can confirm that the comments raised by us (LLFA) have been adequately addressed. <u>Comments 28/03/2023</u> I've had a look through the GLA response and in relation to surface water management, the issues flagged in regards to the use of SuDS are broadly aligned with the comments below. In particular, the GLA have requested clarity on the proposed discharge rates to TW public sewers, due to some inconsistencies highlighted between the text and calculations appended to the report. They have also requested evidence from TW to confirm sufficient capacity is available within the public sewer network to accommodate the proposed flow rates. I have essentially flagged these issues up within the response below and have highlighted that the response from TW contained within the appendices of their report indicates that there is insufficient capacity available to accept the proposed discharge rate provided by the developer/consultant as 6.3l/s (rather than 5.7l/s) The inclusion of rainwater harvesting has been discounted based on very little evidence, which has been flagged within the GLA response. Typically for a high occupancy to roof area ratio the rainwater roof catchment would not support its inclusion, particularly given that there is a green/blue roof. Lastly the GLA response highlights the need for a Flood Warning and Evacuation Plan. I am not sure whether our Emergency Planning team would request the inclusion of a	Noted that comments have been adequately addressed. Conditions added.

	specific condition in relation to the requirement to submit a FWEP, as based on a review of previous LLFA consultation responses provided to the planning team I have not seen one added, although this may well be just that the site is located within FZ1. In summary, there is broad alignment in the issues flagged within the LLFA consultation response and the GLA response you have forwarded across <u>Comments 13/03/2023</u> Thank you for consulting us on the above captioned planning application ref HGY/2023/0261 for full planning permission relating to the refurbishment and extension of Berol House to include Use Class E floorspace; and the redevelopment of 2 Berol Yard to provide new residential homes and Use Class E floorspace; with associated landscaping, public realm improvements, car and cycle parking, and other associated works at Berol Quarter, Ashley Road, London N17 9LJ. It is noted that this application is linked to HGY/2023/0241, which seeks to amend the original hybrid planning application consent issued under HGY/2017/2044 given that the Applicant no longer intends to deliver the final phases of permission ref. HGY/2017/2044 at the wider Berol Yard site and instead proposes to deliver the proposals submitted under HGY/2023/0261. It is acknowledged that in relation to drainage and flood risk, various details have been previously provided as part of the original planning application and subsequent reserved matters applications to discharge drainage related conditions attached to HGY/2017/2044, notably HGY/2018/2165 and HGY/2019/2068. Therefore, we note that many of the principals and approaches for the management of surface water run-off from the development have been established and agreed as part of the previous consultations on planning applications submitted in relation to this site. In terms of flood risk and drainage, Planning Application HGY/2023/0261 is supported by the report prepared by WSP, entitled ‘BEROL QUARTER Flood Risk Assessment & Outline Drainage strategy’ (Doc ref no. 70094918-WSP-XX-XX-RP-CV-00001), dated Dec	

	2022 and related drawings and documents. Further to review of the submitted details, we have made the following observations regarding the proposals, which are outlined below; 1) It is noted that in terms of discharge destination, the Applicant/Agent intends to discharge flows off site to the existing public surface water sewer located within Ashley Road. Whilst the LLFA and it appears TW have been previously consulted on the proposals and accepted proposed discharge rates we it is noted that Appendix C.1 of the above captioned report includes a pre planning enquiry from Thames Water, dated 21st November 2022 (TW Ref. DS6100012) to seek confirmation that sufficient capacity within the public sewer network. Section 11.4.1 of the FRA and Outline Drainage Strategy report states that 'Thames Water has responded to the Pre-Development enquiry for the Proposed Development confirming sufficient capacity at the proposed points of connection, as shown in Appendix C.1.' However, it is stated within the TW response that there is insufficient capacity within the existing system to accept the proposed discharge of 6.3l/s for all storm events up to and including 1 in 100 yr plus climate change event (+40% uplift) into the 225mm surface water sewer in Ashley Road located downstream of manhole TQ34894603. Clarification and confirmation from TW on this is considered essential given the viability of the drainage strategy is intrinsically linked to the availability of sufficient capacity to accept proposed surface water discharges from the development. If it is confirmed insufficient capacity is available, then either a) alternative proposals should be provided which restrict discharges to the accepted discharged rate that TW agree can be accepted by their public surface water system, or, b) provide confirmed scope of upgrading works required within the off-site public sewer system to accept the flows. It is anticipated that these would be implemented under a S98 Sewer Requisition under the WIA 1991 2) It is noted that the scheme as shown in the Drainage Layout (Drg. 70094918-WSP-XX-XX-M2-D-0501-P01) that the surface water drainage system will be reliant on a pumped outfall, due to level constraints in achieving a gravity discharge to the public system. As noted under Section 8.1.10 of the WSP report, pumping of surface water is considered to be unsustainable, however, it is accepted as being an established	

	principle of the proposed surface water strategy which has previously been considered and agreed as part of the previous planning applications relating to this site. Whilst the use of pumped outfall is established part of the proposed drainage strategy, we note that there has been no assessment of the residual flood risks associated with any potential failure of the package pumping station, nor has any details been provided on what provisions have been made in terms of emergency storage provision in the event of breakdown. Whilst it is acknowledged that less vulnerable uses are proposed at ground floor with more vulnerable residential uses located at first floor and above, some form of assessment of the risk of failure should be provided Further clarification in regards to the pumping station and assessment of residual flood risks are requested. 3) Currently the full planning application is support by outline details and calculations in the form of WinDES Source Control and 'Quick Storage' outputs, which are not considered to be acceptable for a full planning application Full calculations are required that include all relevant SuDs features and the associated storm network that consider a full range of rainfall data for each return period provided by Micro drainage modelling or similar simulating storms through the drainage system, with results of critical storms, demonstrating that there is no surcharging of the system for the 1 in 1 year storm, no flooding of the site for 1 in 30 year storm and that any above ground flooding for 1 in 100 year storm is limited to areas designated and safe to flood, away from sensitive infrastructure or buildings. These storms should also include an allowance for climate change. 4) For the calculations above, we request that the applicant utilises more up to date FEH rainfall datasets rather than usage of FSR rainfall method. At present the outputs provided within the submitted report do not clearly state which rainfall dataset has been adopted for the purposes of design. 5) Any overland flows as generated by the scheme will need to be directed to follow the path that overland flows currently follow. A diagrammatic indication of where it is anticipated that flooding will occur within the proposed network (if any) and an	

	indication of overland routes on plan demonstrating that these flow paths would not pose a risk to properties and vulnerable development. Following clarification of a number of the above items may result in the requirement to make some material amendment to the submitted drainage strategy, flood risk assessment, outline drainage strategy report and drainage layout drawings (size/siting of attenuation tanks, wet well, point(s) of discharge, etc. etc.) Subject to the above clarifications, we would consider the proposal to be broadly acceptable to us, subject to the following planning conditions to be implemented regarding the Surface water Drainage Strategy and its management and maintenance plan. **Surface Water Drainage condition** No development shall take place until a detailed Surface Water Drainage scheme for site has been submitted and approved in writing by the Local Planning Authority. The detailed drainage scheme shall demonstrate: a) A hydraulic calculations using XP Solutions Micro-Drainage software or similar approved. All elements of the drainage system should be included in the model, with an explanation provided for any assumptions made in the modelling. The model results should be provided for critical storm durations of each element of the system and should demonstrate that all the criteria above are met and that there is no surcharging of the system for the 1 in 2 yr rainfall, no flooding of the surface of the site for the 3.3% (1in30) rainfall, and flooding only in safe areas for the 1% (1in100) plus climate change. b) For the calculations above, we request that the applicant utilises more up to date FEH rainfall datasets rather than usage of FSR rainfall method.	

	c) Any overland flows as generated by the scheme will need to be directed to follow the path that overland flows currently follow. A diagrammatic indication of these routes on plan demonstrating that these flow paths would not pose a risk to properties and vulnerable development. d) The development shall not be occupied until the Sustainable Drainage Scheme for the site has been completed in accordance with the approved details and thereafter retained. **Reason : To endure that the principles of Sustainable Drainage are incorporated into this proposal and maintained thereafter.** **<u>Management and Maintenance condition</u>** Prior to occupation of the development hereby approved, a detailed management maintenance plan for the lifetime of the development, which shall include arrangements for adoption by an appropriate public body or statutory undertaker, management by Residents management company or other arrangements to secure the operation of the drainage scheme throughout the lifetime of the development. The Management Maintenance Schedule shall be constructed in accordance with the approved details and thereafter retained. **Reason: To prevent increased risk of flooding to improve water quality and amenity to ensure future maintenance of the surface water drainage system**	
LBH Pollution	Re: Planning Application HGY/2023/0261 at Berol Quarter, Ashley Road, London N17 9LJ. Thanks for contacting the Carbon Management Team (Pollution) regarding the above full planning permission for the refurbishment and extension of Berol House to include Use Class E floor space; and the redevelopment of 2 Berol Yard to provide new residential homes and Use Class E floor space; with associated landscaping, public realm	Noted conditions on Land Contamination, Unexpected Contamination, NRRM and Demolition/Construction Environmental

	improvements, car and cycle parking, and other associated works and I would like to comment as follows. Having considered all the relevant supportive information on pollution especially the Air Quality Assessment report with reference 70094918 prepared by WSP dated November 2022 taken note of sections 3 (Scope and methodology), 4 (Baseline conditions), 5 (Assessment of impacts), 6 (Mitigation & residual effects) and 7 (Conclusions) as well as the Design and Access Statement dated 12th December 2022, 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. 1. Land Contamination Before development commences other than for investigative work: a. A desktop study shall be carried out which shall include the identification of previous uses, potential contaminants that might be expected, given those uses, and other relevant information. b. Using this information, a diagrammatical representation (Conceptual Model) for the site of all potential contaminant sources, pathways and receptors shall be produced. The desktop study and Conceptual Model shall be submitted to the Local Planning Authority. If the desktop study and Conceptual Model indicate no risk of harm, development shall not commence until approved in writing by the Local Planning Authority. c. If the desktop study and Conceptual Model indicate any risk of harm, a site investigation shall be designed for the site using information obtained from the desktop study and Conceptual Model. The site investigation must be comprehensive enough to enable; a risk assessment to be undertaken, refinement of the Conceptual Model, and the development of a Method Statement detailing the remediation requirements. d. 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.	Management Plans. All aspects form part of the recommended conditions.

	e. Where remediation of contamination on the site is required, completion of the remediation detailed in the method statement shall be carried out and a report that provides verification that the required works have been carried out, shall be submitted to, and approved in writing by the Local Planning Authority before the development is occupied. Reason: To ensure the development can be implemented and occupied with adequate regard for environmental and public safety. 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: i. A construction method statement which identifies the stages and details how works will be undertaken; ii. Details of working hours, which unless otherwise agreed with the Local Planning Authority shall be limited to 08.00 to 18.00 Monday to Friday and 08.00 to 13.00 on Saturdays; iii. Details of plant and machinery to be used during demolition/construction works; iv. Details of an Unexploded Ordnance Survey; v. Details of the waste management strategy; vi. Details of community engagement arrangements; vii. Details of any acoustic hoarding;	

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

	The development shall be carried out in accordance with the approved details. Additionally, the site or Contractor Company must be registered with the Considerate Constructors Scheme. Proof of registration must be sent to the Local Planning Authority prior to any works being carried out. Reason: To safeguard residential amenity, reduce congestion and mitigate obstruction to the flow of traffic, protect air quality and the amenity of the locality." 5. Combustion and Energy Plant Prior to installation, details of the gas boilers to be provided for space heating and domestic hot water should be forwarded to the Local Planning Authority. The boilers to be provided for space heating and domestic hot water shall have dry NOx emissions not exceeding 40 mg/kWh (0%). Reason: As required by The London Plan Policy 7.14. 6. Combined Heat and Power (CHP) Facility Prior to the commencement of the development, details of the Combined Heat and Power (CHP) facility of the energy centre or centralised energy facility or other centralised combustion process and associated infrastructure shall be submitted in writing to and for approval by the Local Planning Authority. The details shall include: a) location of the energy centre; b) specification of equipment; c) flue arrangement; d) operation/management strategy; and e) the method of how the facility and infrastructure shall be designed to allow for the future connection to any neighbouring heating network (including the proposed connectivity location, punch points through structure and route of the link)	

	f) details of CHP engine efficiency The Combined Heat and Power facility and infrastructure shall be constructed in accordance with the details approved, installed and operational prior to the first occupation of the development and shall be maintained as such thereafter. Reason: To ensure the facility and associated infrastructure are provided and so that it is designed in a manner which allows for the future connection to a district system. Informative: 1. Prior to demolition 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.	
LBH Transportation	1. CONDITIONS: a. Cycle parking provision to comply with London Plan and LCDS. b. Construction Logistics and Management Plan. c. Delivery and Servicing Management Plan. d. Car and Cycle Park Management Plan including reduction of retained contractual parking spaces on site. e. Reassessment of car parking provision for disabled users – given that current proposals are deemed non-compliant. 2. S106 (HoT): a. Two separate Travel Plans and monitoring fees (£3000 each for Commercial and Residential Travel Plans). b. Provision of Car Club and £50 user credit for residents for a period of three years.	Following satisfactory responses to queries, no objection subject to recommended conditions and s106/s278 obligations.

	c. Car free agreement to restrict eligibility of all residents from obtaining CPZ parking permits. d. Permissive paths agreement – Berol Passage / Berol Walk / Berol Square / Gessner Lane / staircase / lift etc. e. Provision and safeguarding of Bridge abutment / staircase and lift. Tue 25/04/2023 18:43 Transport comments are as follows: Hello Philip, Further to our discussion, I summarise and confirm the following regarding the applicant's responses below: a. Cycle parking: Transport Planning would not support proposals for two-tiered cycle parking with provision of aisle width less than 2.5m. It is also inappropriate for cycle parking layout to be conditioned for later consideration. b. Blue Badge Car Parking: Transport Planning would not support failure to undertake the required 'careful consideration' and the corresponding low proposed level of Blue Badge Parking for Berol House. Please clarify time scale for reducing existing standard car parking. c. Please clarify time scales for interim and final layout for car parking / cycle parking layouts for Berol Yard. d. Regarding provision and utilisation of car club vehicles, the average figures provided for the year are not considered appropriate to assess provision for car club vehicles. Details of hourly utilisation throughout the weekday and weekends should be provided for existing conditions and assessment of details of future forecast demands / utilisation with committed and proposed development, are required. Details of Zipcar's criteria for triggering requirement for provision of additional car club vehicles should be provided. It is not acceptable for these matters to be left for consideration at some future date. Regards,	

	Shreekant Patel --- Wed 19/04/2023 20:34 Transport comments regarding the applicant responses are as follows: a. The LCDS for aisle widths adjacent two-tiered cycle parking is required to ensure users do not have to lift bicycles from the cycle stands and improve quality of cycle parking provision. I do not agree that site constraints and competing uses make it necessary or acceptable for aisle widths to be reduced because this is a new development that should be designed to meet LCDS – it is not retro-fitting for an existing building. Standards should not be compromised to facilitate new development above capacity of site or for viability reasons etc. b. Regarding provision for 'Blue Badge' car parking for Berol House, I do not accept or agree with the applicant or GLA comment, that provision of one disabled person parking space is policy compliant because: **i.** London Plan Policy 6.5 indicates at paragraph 10.6.23 - Standards for non-residential disabled persons parking are based on a percentage of the total number of parking bays. **Careful assessment will <u>therefore</u> be needed to ensure that these percentages make adequate provision in light of the need for disabled persons parking bays by Blue Badge holders**. The provision of disabled persons parking bays should be regularly monitored and reviewed to ensure the level is adequate and enforcement is effective. **All proposals should include an appropriate amount of Blue Badge parking, providing at least one space even if no general parking is provided.**	

	ii.	London Plan Policy T6.1 (Residential Parking) indicates at paragraph 10.6.12 - In implementing this policy, **if three per cent of a scheme is less than one space, this should be rounded up to one.** **The above references to 'providing at least one space even if no parking is provided', does not negate the need for ' careful assessment' and is intended to be used as 'rounding up' figure for when considering smaller developments, rather than an absolute figure for larger developments - as currently proposed.**	
	iii.	Given that Policy T6.1 (G) requires 10% of dwelling to be accessible with parking provision – it is necessary to consider both end of journeys - between home and work, and the corresponding parking provision at each trip end, when undertaking the required 'careful assessment of adequate / appropriate provision' of disabled persons parking, for employment/office use proposals. **No evidence presented of 'careful assessment' having been undertaken that demonstrates that provision of one 'Blue Badge' holder parking space is adequate /appropriate or policy compliant for the proposed office development. The applicant should consider the percentage of working age people with 'Blue Badge' parking permits, together with employee capacity at proposed Berol House employment space etc. to assess potential demand and provision for disabled persons parking. Please also consider the general duty of Local Authority under the Equalities Act 2010, when assessing provision for disabled person parking.**	
	iv.	There appears to be an error in statement ' However, the Applicant is keen to highlight that it expects the residential Blue Badge parking provision not to exceed demand,…'. It is not considered to appropriate to reallocate disabled persons parking spaces required for accessible units, for use by	

	disabled office employees / visitors. The required provision for each proposed use should be provided. c. Regarding Figure 6.12 and Figure 6.6 – Are the car parking spaces and the cycle parking both at ground floor levels or different levels? d. Regarding provision of Club bays, the current proposals are significantly different from those previously considered under Planning Ref: HGY/2017/2044. The TAR should assess / review the existing and committed demands for car club vehicles and demonstrate adequacy of provision of car club vehicles / capacity, to service the cumulative demands including from additional residential development proposals. A detailed proposal will be required. Regards, Shreekant Patel --- Tuesday, March 21, 2023 4:26 PM Transport comments are as follows: a. The site has excellent public transport accessibility (PTAL=6a) and is located within a CPZ. b. The proposals are for the refurbishment of Berol House to provide 5209m2 GEA Office use and 714m2 GEA retail/commercial use. In addition, the proposals includes development of 2 Berol Yard to provide 210 residential units, 706m2 retail / commercial use and 161m2 community use space. c. The proposal includes cycle parking provision for 48 long-stay and 30 short-stay cycle parking spaces for Berol House and 380 long-stay plus 24 short-stay spaces for 2 Berol Yard. The layout of cycle parking does not meet LCDS standards for aisle widths adjacent to two-tiered cycle parking. Revised submission of detailed	

	cycle parking layout with dimensioned plans that complies with LCDS, are required. d. The proposals for 2 Berol Yard will be car free except for provision for 'Blue Badge' car parking. This will initially include 3% provision for 6 'Blue Badge' holder parking spaces required for the residential units and one space for retail use. London Plan requirement for 10% of dwellings to be accessible and have parking spaces is not subject to reduction by reference to data from other sites. A parking management plan will be required to set out how this level of provision will be provided. The proposals for Berol House will include provision for one Blue Badge parking space. However, there will be 30 standard car parking spaces retained for existing tenants with contractual rights. The provision of one 'Blue Badge' parking space for the commercial use (5209m2 GEA) is not considered adequate. Further detailed assessment is required using number of employees / multiple occupiers and statistics of percentage of working age people with 'Blue Badge' permits. Clarification is required regarding the overlaps in layout of interim retained 30 car parking in Fig.6.12, the cycle parking illustrate at Figure 6.6 and the vehicular swept path for a refuse vehicle, below.	

Figure 6-12 Interim Car Parking Provision

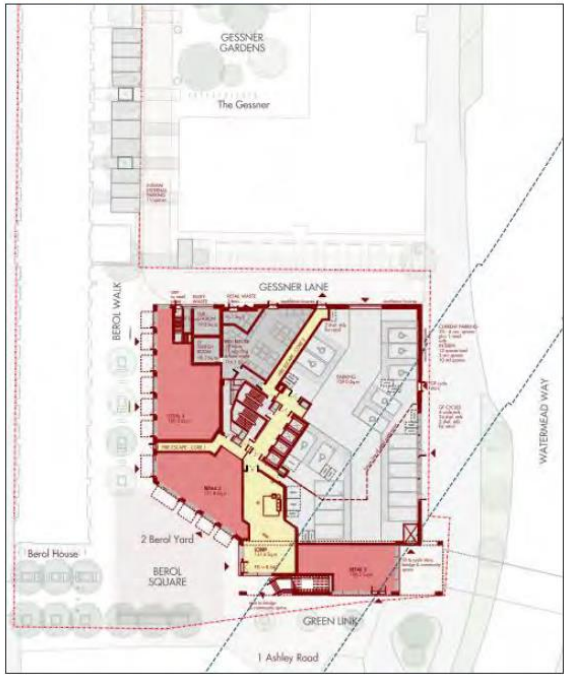

Figure 6-6 2 Berol Yard Ground Floor Cycle Facilities

e. Further detailed assessment is required regarding the demand and provision for car club vehicles, 2 year free

	membership for residents plus £100 user voucher etc. A s106 agreement for this will be required. The limited information included regarding existing car club bays in the vicinity is not considered adequate. f. East-west pedestrian movements through the Site will be via Berol Passage and Gessner Lane or Green Link. North-south pedestrian movements will be via Berol Walk. It is recommended these routes be designated and secured as public rights of way to enhance permeability. g. For 2 Berol Yard, servicing vehicles for retail units 1 and 2 will use the existing servicing bay on Watermead Way. Servicing vehicles for retail units 2, 3 and 4, and the residential lobby will use the servicing bay on Ashley Road. For Berol House, servicing vehicles for the retail units and office will be via the servicing bays on Ashley Road. h. Assessment of trip generation indicates there will be an overall net reduction in trips from the current proposals than from the previously consented development on this site. i. There is reference to a Bridge over Watermead Way and some provision for construction works (western abutment) being undertaken as part of this development. Please clarify what works are envisaged because these works may require a s106 / s278 agreement. j. Framework Travel Plans: A requirement for detailed travel plan to be submitted for approval prior to occupation should be secured via s106 agreement, This should allow for separate travel plans for the Commercial and residential uses. Each travel plan will also be subject to £3000 monitoring fee. k. Construction Logistics Management Plan. A condition is required for submission of a detailed construction logistics management plan for approval prior to start of any works on site. This should follow format of TFL Construction Logistics Plan	

	guidance. I understand there may have been a s106 charge for a highways / construction officer to coordinate traffic management works for the various adjacent development sites – this arrangement should be replicated / secured via s106 agreement for this development. l. A condition requiring submission of a car park management plan is required. This should include details of how car parking (for commercial and residential) will be allocated and managed. All car parking spaces should be leased and not sold with individual property. Under planning application HGY/2023/0241, the current Berol Quarter proposals would sever ties with previously consented development HGY/2017/2044 and be considered as a free-standing site. Please clarify: i. whether that means that all the infrastructure works secured with HGY/2017/2044 would need to be completed (representing a new base scenario), before the current application can be occupied because it would be reliant on loading bays on Ashley Road etc. ii. whether the proposed changes will affect any existing s278 agreements and s106 agreement obligations / funding for highway works and contribution for public realm improvements / design or DEN delivery etc. iii. There is reference to use of a booking system for delivery slots – however, given that deliveries will use loading bays on public highway, clarification is required regarding what is proposed. Regards Shreekant Patel Principal Transport Planner.	
LBH Waste Management	Fri 10/02/2023 I've had a look at the planning application documents for this development and in particular the operational waste plan and management strategy for Berol Quarter Ashley	Noted – Waste plan condition and obligation to secure funding for

	Rd, London N17. This is a detailed plan and provides clear information about how waste will be managed within individual units and externally. Reference was made to the recycling centre in Park View Rd (pg.4) but this site closed some years ago and the remaining Haringey recycling centre is in Western Rd, N22 6UG. The proposal at Berol Yard has mixed residential, commercial, and retail units and the developer has confirmed that the commercial and retail units will be collected by a private contractor. It stated the commercial tenants would store and segregate waste and recycling in their unit, but I wasn't clear if that is then taken to the external storage points for collection or if the external storage is available in addition to collection from the unit, so clarification on that point would be helpful. Containers for the residential units are calculated as outlined below and follow Haringey's guidance as do the pull distances of the containers to the vehicles. However, please note that Haringey can no longer provide 360 litre bins for food waste due to the weight and 140litre bins are used instead and would equate to 14 x 140 litre bins. **No. of units 210** / **Refuse (1,100 L bin)** / **Recycling (1,100 L bin)** / **Food waste (360 L bin)** Ratio units/bin: 6 / 10 / 35 1 collection/week: 35 bins / 21 bins / 6 bins **2 collections per week: 18 bins / 11 bins / 3 bins** Sizing of the bin store appears to have been based on a twice weekly collection of waste and recycling from the outset. While commercial waste collection companies can provide collections to suit the client, up to twice daily collections 7 days per week, we would however advise against sizing the bins store based on minimum size and maximum collections. The store should be sufficient to store waste for one week. Applicant response Fri 28/04/2023:	twice weekly collection if necessary included.

	We've reviewed the response from LBH Waste Management (attached) and have discussed with BSD and the architects. We note the officer is seeking clarification on a number of points. We've condensed these queries into the following bullet points where we also provide our response in red: • Will commercial tenants move their waste to the external waste store or is the intention for commercial waste to be collected from individual units- ***Waste from the commercial units would be collected from the centralised retail bin store located on the ground floor. Commercial tenants would be responsible for moving waste from their unit to the centralised bin store ready for collection.*** • The waste store should be sufficient to store waste for one week- ***As proposed, the waste store can only accommodate enough waste based on a twice weekly collection. The applicant intends to rely on private commercial waste collection services so in this context the capacity of the waste store is considered sufficient. To provide enough capacity to accommodate waste based on a once weekly collection, the size of the store would need to be increased resulting in the loss of car parking or commercial floorspace. On balance, when considering the clients operational intentions for the scheme, the current waste store provision should be considered acceptable.*** • Confirmation that proposed bin store can accommodate x 14 140L bins- ***It is noted 360L can no longer be provided. We can confirm that the current proposed residential wase store has the capacity to accommodate x 14 140L bins instead of x6 360L bins.***	
LBH Housing	We support the new proposals for rents on the DMR units to be set at 80% of market rent for studios and one-beds, 75% for two-beds, and 65% for three-beds as it aligns much better with our policy position on affordability. We would like to see a commitment to retaining rents calculated at these levels and using the same methodologies going forward.	Support from Housing colleagues is noted. The affordability of the DMR units shall be secured in the s106 legal agreement.

	We also welcome the commitment to develop an approach to allocations jointly with the Council and would like to see that approach covering both LLR and DMR units. That process will need to ensure allocations and lettings align with our Intermediate Housing Policy. We would also like a commitment to prioritise households with children for the two- and three-bed DMR units, and to ringfence two- and three-bed LLR units for households with children.	
LBH Education	These comments are from a school place planning perspective: There is sufficient primary and secondary capacity in Planning area 4 where this development is located to fulfil the potential child yield this development may result in.	Noted
LBH Regeneration	Planning Application Review: Alan Hayes Regeneration Manager, Tottenham Hale **Berol Quarter (Berol Yard)** HGY/2023/0261 **14.04.23** **1. Background** 1.1 This paper offers comments and observations on the recent planning application in relation to Berol Quarter (Berol Yard). The site was granted planning permission under a hybrid application, HGY/2017/2044, as part of the Ashley Road South masterplan. *1.2* The proposal, as described within the planning application HGY/2023/0261: *Full planning permission for the refurbishment and extension of Berol House to include Use Class E floorspace; and the redevelopment of 2 Berol Yard to provide new residential homes and Use Class E floorspace; with associated landscaping, public realm improvements, car and cycle parking, and other associated works.* 1.3 Application detail: 1.3.1 Reference: HGY/2023/0261 1.3.2 Applicant: Berol Quarter Ltd	Noted, conditions securing detail of cycle parking, hard and soft landscaping and wayfinding included.

	1.3.3 Agent: Lichfields 1.3.4 Architect: Allies and Morrison LLP 1.4 The application is due to go to planning committee in May of 2023. 1.5 The site is bordered to the east by Watermead Way, to the West by Ashley Road, to the north, by The Gessner development, and to the south, by the Ashley Road East development, both mixed-use schemes delivering a mix of residential and commercial uses. 1.6 The application has been referred to the GLA, in response to Categories 1A, 1B and 1C of the Schedule to the Order 2008. Comments from the GLA have been received by LBH via a Stage 1 report 27.03.23. 1.7 The purpose of this paper is to review and record comments against the application and its response to its surroundings in the context of the DCF, GOSS, SSS and regeneration projects delivered and forthcoming in Tottenham Hale. 1.8 It is imperative that new developments sit well in their context, responding well and have a good connection with the ground plane, public realm and landscaping. 1.9 As such, this review is concerned with activity and activation of the ground plane, public realm, landscaping, connection to context, and materiality in the context of Tottenham Hale, as illustrated and described in the application documents. 1.10 This review is *not* an assessment of the application in response to planning policy, a technical or statutory review, or a commentary on design quality of individual residential units.	

	1.11 On this basis, planning documentation reviewed here is largely limited to the Design & Access Statement, site plan, landscaping plans and ground floor plans. 1.12 Location and context:  	

	2. Application detail 2.1 The proposal comprises: 2.1.1 Berol House - The addition of 3 new floors of commercial accommodation located above the existing 3 storey building. Lower floors will be refurbished and the ground floor of the existing building facade will be modified to offer flexible retail accommodation and a publicly accessible route through the building. Berol House will provide 5,500sqm GIA commercial floorspace. 2.1.2 2 Berol Yard – Podium blocks and tower elements of 18-32 storeys providing 210 rental homes with a mix of 706sqm flexible retail and commercial floorspace at ground floor level, with a community space of 161sqm and enabling works for a bridge connection over Watermead Way. 2.1.3 Berol Square – a public space framed by the adjacent buildings of Berol House and 2 Berol Yard. The extension of Berol Walk, a vehicle-free space into which the adjacent retail units will spill out, creating a vibrant, engaging space. **3. Observations** 3.1 The following notes outline our comments and views on proposals with regards to layout, public realm, activity, access, movement, links and connection to context. 3.2 However, as noted above, this is not a full analysis of each document and report submitted, limited only to relevant drawings and the Design & Access Statement. **4. Layout**	

	4.1 Berol Square location is positive and forms a point to pause on the Green Link, as opposed to being located adjacent to Berol Passage and The Gessner. *Ref 22049_07_002 Site Plan* 4.2 Residential entrance – a single, generous entrance and lobby area is commendable, regardless of tenure. *Ref 22049_07_100 GF Plan* 4.3 Frontage to Gessner Lane risks feeling more like a service area, with little or no activation and vehicle access, parking and waste storage facing the more active frontage of The Gessner. Access and turning, movement and activation of this area will require careful consideration. *Ref 22049_07_100 GF Plan* 4.4 Frontage to Berol Walk – looks to be well activated, taken up by retail units. *Ref 22049_07_100 GF Plan* 4.5 Frontage to Berol Square & Green Link – looks to be well activated with retail frontage, residential entrance and access to Green Link stairs. *Ref 22049_07_100 GF Plan* 4.6 Frontage to Watermead Way – activated in part with retail unit, although it is noted the preferred route for pedestrians may become via Berol Square/Walk. *Ref 22049_07_100 GF Plan* 4.7 Berol House/Passage – a welcome move to improve site permeability and accessibility to Berol Walk, subject to measures being in place to reduce ASB. *Ref 22049_07_100 GF Plan* 4.8 Community Space - located at First Floor and accessed via lift beneath colonnade and adjacent to Watermead Way. No entry point indicated on plan, assume this is access from the bridge lobby at FF/mezzanine level? Location at an upper level will mean this space needs to rely more heavily on advertising and signage to attract users. *Ref 22049_07_101 FF Plan* **5. Public Realm & Landscaping** 5.1 Berol House – activation of ground floor/facades is welcomed, especially with dual aspect component omitting the feeling of 'front and back'. *Ref DAS p.53*	

	5.2 Landscaping to Berol Square – represents a good opportunity to vary the surface materials, defining the quality and use of the space. *Ref DAS p.183* 5.3 Landscaping to Berol Walk – use of granite and hexagonal paving. Detailed layouts required to ensure proposals align with established TH palette. *Ref DAS p.186* 5.4 Landscaping to Berol Walk (North) – follows established palette of The Gessner development. *Ref DAS p.188* 5.5 Green Link (east) – landscaping materials noted as matching adjacent Ashley Road East site and/or being delivered by LBH to Watermead Way. Detailed layout required to fully understand, along with material junctions, hexagonal paving and street furniture. *Ref DAS p.191* 5.6 Materials Strategy – notes this is in two parts, matching either the established palettes of The Gessner, or 2 Ashley Road. Detailed specification required to fully understand along with response to wider TH palette. *Ref DAS p.192* 5.7 Landscaping materials to be conditioned throughout – these need to match and/or compliment adjacent plots and established/proposed materials across TH – Berol Sq could be varied, within acceptable parameters. **6. Green Link** 6.1 There is a pinch point created just where the Green Link meets the public realm of Watermead Way and (future) bridge position. Detailed layouts to ensure materials, furniture and planting provide space and flow to movement through this area, in an accessible, welcoming environment, encouraging onward use of the Green Link. *Ref: DAS p.18, 19 / 22049_07_100 GF Plan* **7. Accessibility and inclusivity** 7.1 Blue Badge parking – notes provision for 7 accessible spaces within development and 15 within public realm. DAS sets out potential 8 spaces within public realm (Berol Walk), leaving 7 of the 15 listed above to be located elsewhere. Where are these to be located? *Ref DAS p.152 & p.189*	

	7.2 Pedestrian and Cycle movement – looks to be clear and legible with generous public realm and a hierarchy of use within the landscaping. *Ref DAS p.169* 7.3 Cycle parking - strategy seems to be to access upper level bike store via a single lift – need to ensure lift is large enough to comfortably use with larger bikes, and those with trolleys/trailers taking shopping/children. *Ref 22049_07_100 Mezzanine Plan* **8. Wayfinding/signage** 8.1 No mention of wayfinding or signage – details to be submitted to understand this is appropriate and in line with emerging strategies. **9. Conclusion / Summary** 9.1 The application has been reviewed from a regeneration perspective, with regard to and as set out above, has focused on activity and activation of the ground plane, public realm, landscaping, connection to context, and materiality in the context of delivered and emerging schemes across Tottenham Hale. 9.2 Overall, the quality of the application and design proposals is acknowledged, making a positive contribution to the masterplan, the local area and the public realm. 9.3 However, there are a number of observations and points requiring further clarity (potentially through conditions to allow the applicant time to provide the additional detail suggested or requested, to satisfy LBH of compliance with established strategies and materials palettes, for example): 9.3.1 Detail of the design of the Green Link adjacent to Watermead Way, and access to the future bridge link (these must be generous and welcoming) 9.3.2 Landscaping materials and specification in relation to wider TH context. 9.3.3 Ensuring accessibility and inclusivity through adequate and user-friendly cycle storage and accessible vehicle parking.	

	9.3.4 Clarity required on wayfinding/signage strategies to be developed in conjunction with emerging TH strategies.	
LBH Economic Regeneration	We have now had chance to review the details regarding our discussions around workspace and would like to explore the following matters as the basis for agreeing a way forward in the very near future: 1. **2 Berol Yard – [Made by Tottenham – Cultural and Arts Space]:** • We would need a longer lease as most capital grant giving bodies require a lease for at least 25 years. We would also want to factor in some time to enable the development of a programme to take advantage of any grant funding. • We would be seeking Peppercorn Rent and relief on auxiliary and service costs for the full term of the lease to help establish a sustainable business model. • We would like to see reference to space being provided to an organisation that will "create a cultural and creative front door and hub for the local community" rather than any specific reference to Made By Tottenham at this stage as the position of MBT is still being considered by its members; this said we would like the terms to include reference to providing the Council with first refusal for the space. • A payment to contribute to the staffing and activation budget for first 5 years to help establish a sustainable business model around the curation of the internal and external spaces provided. 2. **Additional Affordable Workspace:** • We would seek for this to be provided at a peppercorn rent (along with relief on auxiliary and service costs) for the duration of the term to help establish a sustainable business model. • We would also seek a payment and/or robust plan which contributes to the staffing and activation budget for this space to help engender the same	Noted.

	placemaking objectives that would have been met by Berol House encouraging visitors to explore the area, enticing them in, breaking down the barriers (in the case of Berol House the physical walls to create better permeability) 3. **2 Berol Yard - Public Art and Community Contributions:** • We would seek for this period to align with the lease for the cultural and creative front door and hub as both must work (and be seen to work) together as one.	
LBH Streets and Spaces Consultant	Thank you for the opportunity to comment on this application. Our interest, from a highway perspective is focused on the ground floor of the building and the way it relates to our planter and the cycle lane in Watermead Way that we are in the process of constructing. We hope that with further engagement with the designers and landowner we can make adaptations to both of our designs to ensure the two schemes work together. The principles behind the proposal are a safest interaction between cyclists and pedestrians in the area and a rationalised material treatment of the surfaces. Currently the paving within the redline ownership boundary is different to the Modal proposed on the Highway. We would suggest that the same principle as has been adopted around the rest of the Tottenham Hale public realm is adopted here, namely that the narrow section of smaller (100x200mm) modal is used along the edge of the building to "frame" it and then the Highway proposed modal sizing 400x300 and 300x200mm is used on the remaining private land to tie in with the highway (land ownership to be demarked with studs). This will make the footway feel more generous, will create a consistent corridor for pedestrian on Watermead Way and address the feeling of pinch points between the building columns and our planter. From our side we will amend our design to bring the tactile paving and end of the segregated cycle lane to be in line with the edge of the proposed building to reduce pedestrian/ cyclist conflict at this junction and pinch point.	Noted, hard landscaping conditions will secure further details in this regard.

	Other than the above we feel that the distances provided within the highway are adequate and that the proposals will contribute positively to this section of the Tottenham Hale scheme.	
EXTERNAL		
Environment Agency	Thank you for your email and apologies for the delayed response. Upon looking at our records, it appears we have not responded to this application as it falls outside of our remit for comment. Although this site falls within Flood Zone 2, the advice falls under our national flood risk standing advice Review individual flood risk assessments: standing advice for local planning authorities - GOV.UK (www.gov.uk)	Noted.
Mayor for London / Greater London Authority (GLA)	**Strategic issues summary** **Land use principles**: The development of this brownfield site for a high-density, mixed-use development is acceptable in principle **Affordable housing**: Overall, the affordable housing offering would comprise 35% Discount Market Rent housing, of which, 30% would be at London Living Rent levels and the remaining 70% at Discount Market Rent. With an appropriate tenure split between DMR and LLR the proposal is generally considered to be Fast Track compliant. **Urban design**: Whilst the site is within a location identified as appropriate for tall buildings, there are some concerns about height, massing, separation distances and width of the green link, which indicates potential over-development. **Transport:** Further information on the strategic transport issues arising from this development will be required to ensure full compliance with the London Plan. Other issues on sustainable development and environment also require resolution prior to the Mayor's decision-making stage. **Recommendation** That Haringey Council be advised that the application does not yet comply with the London Plan for the reasons set out in paragraph 108. Possible remedies set out in this report could address these deficiencies.	Noted conditions are recommended.

Context

1. On 06 February 2023 the Mayor of London received documents from Haringey Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008, the Mayor must provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

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

• Category 1A: "Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats"

• Category 1B: "Development (other than development which only comprises the provision of houses, flats or houses and flats) which comprises or includes the erection of a building or buildings outside Central London and with a total floorspace of more than 15,000 square metres" and

• Category 1C: "Development which comprises or includes the erection of a building of more than 30 metres high and is outside the City of London"

3. Once Haringey Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or, allow the Council to determine it itself.

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

Site description

5. The subject site comprises two plots, being 2 Berol Yard as well as Berol House. It forms an 'L' shaped parcel of land with a total area of 0.5 hectares. 2 Berol Yard is a

	vacant plot, most recently used as a construction site for neighbouring development and temporary car parking. Berol House is a three storey locally listed building utilised as an office building (circa 3,400 sqm). 6. The site sits within the Ashley Road South Masterplan (ARSM), Tottenham Hale, London. The brownfield site is located within the Lee Valley Opportunity Area. It is partly located within the Tottenham Hale Town Centre. The surrounding area is characterised by mostly redeveloped site comprising new residential buildings, new retail and commercial units at ground floor level along with new landscaped routes. 7. The site is highly accessible with a PTAL of 5-6a (where 1 is least accessible and 6b is most accessible). The nearest section of the Transport for London Road Network (TLRN) is the A503 The Hale, approximately 100 metres to the south-west of the site. Tottenham Hale Underground Station is 180m from the site. It is also within close proximity of Tottenham Hale Bus Station which is served by eight regular bus services. **Details of this proposal** 8. The proposal seeks planning permission for the refurbishment and extension of Berol House to include Use Class E floorspace; and the redevelopment of 2 Berol Yard to provide 210 new Built to Rent (BtR) residential homes as well as Class E floorspace; with associated landscaping, public realm improvements, car and cycle parking, and other associated works. The commercial portion of the development would deliver 6,359sqm. **Case history** 9. The applicant received planning permission at Berol Yard (ref: HGY/2017/2044) on 8 June 2018 for: *“Application for full planning permission for the demolition of the existing buildings within the Berol Yard site and retention of Berol House. Erection of two buildings between 8 and 14 storeys providing 166 homes, 694 sqm (GEA) of commercial floorspace (Class*	

	A1/A3/B1), 7,275 sqm (GEA) of education floorspace (Class D1), car and cycle parking, open space, landscaping and other associated works. Application for outline planning permission (all matters reserved) for the alteration and conversion of ground, first and second floors of Berol House with up to 3,685 sqm (GEA) of commercial floorspace (A1/A3/B1) and the introduction of a two-storey roof level extension introducing up to 18 homes, cycle parking and other associated works." 10. The permission has been partially built out with Building 4 and the associated public realm, now known as the Gessner, having been completed and occupied in 2021. The remaining two plots (Berol House and the College building) of the original hybrid planning application have been unable to be progressed 11. There is a Section 73 linked to this application for a minor material amendment to the permitted scheme at Berol Yard (planning permission ref: HGY/2017/2044). This application seeks to delete and amend existing conditions and add a condition to ensure that phases 3, 4, and 5 will be severed from HGY/2017/2044 upon implementation of any new planning permission being granted in respect of these phases. **Strategic planning issues and relevant policies and guidance** 12. For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area comprises the Haringey Local Plan: Strategic Policies DPD (2013 with alterations 2017); Haringey Local Plan: Development Management DPD (2017); Haringey Local Plan: Site Allocations DPD (2017); Tottenham Area Action Plan (2016); Tottenham Hale District Centre Framework (2015); and the London Plan 2021. 13. The following are also relevant material considerations: • The National Planning Policy Framework (2021) and National Planning Practice Guidance; • National Design Guide (2021).	

	14. The relevant issues, corresponding strategic policies and guidance (supplementary planning guidance (SPG) and London Plan guidance (LPG)), are as follows: • Good Growth - London Plan • Economic development - London Plan; the Mayor's Economic Development Strategy; Employment Action Plan; • Opportunity Area - London Plan; • Town centre uses - London Plan; • Housing - London Plan; Housing SPG; the Mayor's Housing Strategy; Play and Informal Recreation SPG; Character and Context SPG; Housing Design Standards draft LPG; • Affordable housing - London Plan; Housing SPG; Affordable Housing and Viability SPG; the Mayor's Housing Strategy; • Retail / Office - London Plan; • Urban design - London Plan; Character and Context SPG; Public London Charter LPG; Characterisation and Growth Strategy draft LPG; Optimising Site Capacity: A Design-Led Approach draft LPG; Housing SPG; Play and Informal Recreation SPG; Housing Design Standards draft LPG; • Fire Safety – London Plan; Fire Safety draft LPG; • Inclusive access - London Plan; Accessible London: achieving an inclusive environment SPG; Public London Charter LPG; • Sustainable development - London Plan; Circular Economy Statements LPG; Whole-life Carbon Assessments LPG; 'Be Seen' Energy Monitoring Guidance LPG; Energy Planning Guidance; Mayor's Environment Strategy; • Air quality - London Plan; the Mayor's Environment Strategy; Control of dust and emissions during construction and demolition SPG; Air quality positive LPG; Air quality neutral LPG; • Ambient noise - London Plan; the Mayor's Environment Strategy; • Transport and parking - London Plan; the Mayor's Transport Strategy; • Equality - London Plan; the Mayor's Strategy for Equality, Diversity and Inclusion; Planning for Equality and Diversity in London SPG; • Green Infrastructure - London Plan; the Mayor's Environment Strategy; Preparing Borough Tree and Woodland Strategies SPG; All London Green Grid SPG; Urban Greening Factor LPG;	

	• On 24 May 2021 a Written Ministerial Statement (WMS) was published in relation to First Homes. To the extent that it is relevant to this particular application, the WMS has been taken into account by the Mayor as a material consideration when considering this report and the officer's recommendation. Further information on the WMS and guidance in relation to how the GLA expect local planning authorities to take the WMS into account in decision making can be found here. (Link to practice note). **Land use principles** 15. The site is within the Lee Valley Opportunity Area (OA). As identified in London Plan Policy SD1 and Table 2.1, the Lea Valley OA has an indicative capacity for 21,000 new homes and 13,000 jobs. <u>Commercial and town centre uses</u> 16. The site is partially located within the Tottenham Hale Town Centre. London Plan Policies SD6, SD7, SD8 and SD9 support mixed use development in town centres. Additionally, London Plan Policies E1 and E2 support new office provision and mixed-use development, with the focus on identified geographic areas and town centres; and states that new offices should take into account the need for a range of suitable workspace, including lower cost and affordable workspace. 17. The Site Allocation 'Ashley Rd South Employment Area' (Ref: TH6) envisages the wider site for an employment-led mixed-use quarter north of Tottenham Hale District Centre, with capacity for 444 homes and 15,300sqm of commercial floorspace 18. It is understood that approximately 6,500sqm of non-residential floorspace has been constructed, or is approved, as part of the other consented schemes within the Allocation. 19. The education floorspace of approximately 7,200sqm would no longer be delivered at this site; as the College is no longer coming forward. However, the proposals would include 6,359sqm of non-residential floorspace across the site, including an uplift of	

	approximately 1,800sqm (3,685sqm existing and 5,492sqm proposed) in Berol House compared to that consented. Ground level non-residential uses would provide welcome activation to the public realm. The increase in non-residential uses in Berol House is welcomed in contributing to the Site Allocation aim for a mixed-use quarter. The proposals would deliver significant qualitative improvement in the commercial space on the site; replacing low grade accommodation with high quality units designed to appeal to a range of prospective end users, which is supported. 20. The applicant stated that much of Berol House is vacant and many other tenants are on short-term leases, understood to include below-market rents. The intention is for some tenants to be rehoused in the new Berol House. Details of the relocation strategy should be included in any application. 21. The non-residential uses have been established through the extant permission and these uses remain strongly supported in principle. <u>Housing</u> 22. London Plan Policy H1 sets out the requirements for boroughs to achieve the housing supply targets set out in Table 4.1, which identifies a ten-year housing completion target of 15,920 homes for Haringey. Additionally, Policy H1 recommends that boroughs optimise the potential for housing delivery on brownfield sites, especially sites with public transport access levels (PTALs) of 3-6 or which are located within 800 metres of a station or town centre; and housing intensification on low-density sites in commercial, leisure and infrastructure uses. 23. The site comprises a significant development opportunity within the Borough and the proposed residential use on this under-utilised site, partly within a town centre and with very good public transport connections, is supported in principle. The uplift in residential use compared to the consented scheme is also welcomed, subject to resolution of matters raised in this report.	

	Summary 24. The development of this brownfield opportunity area site for a high-density, mixed-use development is acceptable in principle. **Housing** <u>Affordable housing</u> 25. London Plan Policy H4 seeks to maximise affordable housing delivery, with the Mayor setting a strategic target for 50% of all new homes to be genuinely affordable. London Plan Policy H5 states that the threshold level of affordable housing is a minimum of 35%. Schemes can follow the 'fast track' viability route and are not required to submit viability information nor be subject to a late stage viability review if they meet or exceed the relevant threshold level of affordable housing on site without public subsidy; are consistent with the relevant tenure split; meet other relevant policy requirements and obligations to the satisfaction of the Council and the Mayor; and demonstrate that they have taken account of the strategic 50% target and have sought grant to increase the level of affordable housing. 26. London Plan Policy H11 and the Mayor's Affordable Housing and Viability SPG recognises the contribution of Build to Rent in addressing housing needs and increasing housing delivery, and establish a set of requirements for this tenure, which would need to be secured in the section 106 agreement for any permission, including: • The homes must be held under a covenant for at least 15 years (apart from affordable units, which must be secured in perpetuity); • A clawback mechanism must be put in place to ensure that there is no financial incentive to break the covenant; • The units must be self-contained and let separately; • There must be unified ownership and management of the private and affordable elements of the scheme;	

	• Longer tenancies (three years or more) must be available to all tenants with break clauses for tenants; • Rent and service charge certainty for the tenancy period on a basis made clear before the tenancy agreement is signed including any annual increases, which should be formula-linked; • On-site management; • Providers must have a complaints procedure in place and be a member of a recognised ombudsman scheme; and • Providers must not charge up-front fees of any kind to tenants or prospective tenants outside of deposits and rent-in-advance. 27. London Plan Policy H11 states that where a Build to Rent development meets these criteria, the affordable housing offer can be solely Discounted Market Rent (DMR) at a genuinely affordable rent, preferably London Living Rent level. DMR homes must be secured in perpetuity. To follow the fast-track viability route, Build to Rent schemes must deliver at least 35% affordable housing, and the Mayor expects at least 30% of DMR homes to be provided at an equivalent rent to London Living Rent, with the remaining 70% at a range of genuinely affordable rents. Schemes must also meet all the other requirements of Policy H5. Further guidance is provided in the Affordable Housing and Viability SPG. 28. The Haringey Local Plan states that 40% affordable housing is the expectation, with a tenure mix of 60% low-cost rent and 40% intermediate. However, the Tottenham AAP confirms that the housing priority in this area is for intermediate accommodation, due to the existing concentration of social housing in Tottenham. A portfolio approach has been used for the planning permissions across the masterplan area, whereby 35% affordable housing has been achieved with a tenure split of 70% intermediate, 30% affordable rent. 29. In terms of the applicant's own portfolio of sites in the masterplan area and planning applications, the applicant stated that 37% affordable housing has been achieved, and a breakdown has subsequently been provided. Within this, the previous consent for the wider site secured 14% affordable housing, which was agreed taking account of the	

	financial burden of the proposed College. It is understood that permission secured viability review mechanisms, including a late-stage review, which should have considered the removal of the College from viability considerations. 30. For the proposal site, 35% (by habitable room) affordable housing is proposed (refer to Table 1), which is welcomed, to be delivered at Discount Market Rent (DMR), of which 30% will be provided as London Living Rent (LLR). 31. The proposal would provide an uplift of 54 affordable homes above the extant planning permission (HYG/2017/2044). 32. Overall, 35% affordable housing is proposed as part of a Build to Rent scheme. The affordable housing would be Discount Market Rent housing, of which, 30% would be at London Living Rent levels and the remaining 70% at Discount Market Rent. With an appropriate tenure split between DMR and LLR the proposal is generally considered to be Fast Track eligible. However, qualification for fast track is subject to the other caveats being met including securing the affordability, and other requirements listed under Policy H11, through the s106. An update will be provided at the Mayor's decision making stage. **Urban design** 33. Chapter 3 of the London Plan sets out key urban design principles to guide development in London. Design policies in this chapter seek to ensure that development optimises site capacity; is of an appropriate form and scale; responds to local character; achieves the highest standards of architecture, sustainability and inclusive design; enhances the public realm; provides for green infrastructure; and respects the historic environment. <u>Development layout</u> 34. London Plan Policy D3 states that development proposals should provide active frontages and positive relationships between what happens inside the buildings and	

	outside in the public realm to generate liveliness and interest. They should encourage and facilitate active travel with convenient and inclusive pedestrian and cycling routes and legible entrances to buildings. 35. The existing footprint of Berol House would largely remain unchanged whilst 2 Berol Yard would form a roughly square shape building to the east. This would allow for the creation of the new public space, Berol Square. The new position of Berol Square (compared to the previous permission) allows for the square to be activated by retail frontages and to become a destination point. 36. At pre-application stage, concern was identified regarding the southern footprint of the building which projects out with a 6 storey element, effectively narrowing the green link. The applicant stated that this is intended to mitigate against road noise from Watermead Way; however, this is not acceptable justification and increased planting for such aims it recommended. The route is considered too narrow and would not give the green link the prominence ascribed to it in the masterplan. Although a colonnade is proposed, the 6 storey element would be perceived as the end of the route, with only a narrow uninviting route continuing to Watermead Way. 37. The two buildings would also share an improved pedestrian street, known as Berol Walk, that would enhance the quality of the Green Link. 38. The layout of the residential building has been appropriately designed to maximise dual aspect thereby improving access to daylight and sunlight. <u>Height, scale, and massing</u> 39. London Plan Policy D9 (Part B) states that tall buildings should only be developed in locations identified as suitable in development plans. Part C of Policy D9 also states that tall buildings must address their visual, functional, environmental, and cumulative impacts. Policy D9 further establishes that boroughs should determine where tall buildings are an appropriate form of development in Development Plans.	

	40. Tall buildings are defined in the Haringey Local Plan: Strategic Policies DPD as being buildings 10 storeys and over. Taller buildings are defined as those that are two to three storeys higher than the prevailing surrounding building heights. 41. Figure 2.2 in Haringey Council's Development Management DPD (July 2017) identifies the site as within the Tottenham Hale Potential Location Appropriate for Tall Buildings, although appropriate heights are not identified. As such, the proposal for a 30-storey (110.5 metre) residential building complies with the locational aspects of Part B of Policy D9. The 7 storey (20.8m) office building would not constitute a tall building. <u>Appropriateness of the site for tall buildings</u> 42. Part C of Policy D9 also sets out requirements for assessing tall buildings, including addressing their visual, functional, environmental, and cumulative impacts. Visual impacts 43. The context of the site has changed considerably in recent years as consented developments have been built out, with further sites under construction. The masterplan, as partly built out, clearly steps down from the Argent Related (38 storeys) and Hale Village (34 storeys) towers, both adjacent to the Station. 44. The applicant proposes a building of up to 30 storeys, made up of 5 massing blocks of 6, 18, 25 and two c.30 storey elements, around a central core. The proposed 30 storey elements would clearly be contrary to the masterplan generally reducing height along Watermead Way. Further refinement to the height of this proposal may be required in order to acceptably address the visual impacts of this building. 45. The site does not sit within any protected view corridor and the proposed buildings would not impede short or long range protected views. Functional impacts	

	46. The functional impacts are generally considered acceptable in relation to the internal and external design, building materials as well as the maintenance and building management arrangements. The entrances and exit routes are well defined and the building constructions should not interfere with aviation routes. Lastly, consideration should be given to transport matters raised in the below transport section. Environmental impacts 47. The applicant's technical information on microclimatic and environmental aspects is currently undergoing detailed review by the Council in order to assess the local impacts and identify whether additional mitigation measures are necessary to address these. This should include a full review of the potential daylight and sunlight impacts to neighbouring sites. 48. An update will be provided at the Mayor's decision-making stage. Cumulative impacts 49. London Plan Policy D9(C) requires development proposals to address the cumulative visual, functional, and environmental impacts of proposed, consented and planned tall buildings in an area. This assessment will be concluded at Stage 2. Tall buildings conclusion 50. The proposal is located within an area that is identified as suitable for tall buildings. Whilst the functional impacts are generally acceptable in strategic planning terms, the matters discussed above with respect to visual, environmental and cumulative impacts need to be addressed. A full assessment of Policy D9(C) will be concluded at Stage 2. <u>Public realm and landscaping</u>	

	51. Policy D8 states that development proposals should encourage and explore opportunities to create new public realm where appropriate. Proposals should ensure the public realm is well-designed, safe, accessible, inclusive, attractive, well-connected, related to the local and historic context, and easy to understand, service and maintain. 52. The applicant demonstrates consideration of access to public open space across the site, including Berol Square and Berol Walk with associated planting, in accordance with London Plan Policy G4. 53. As discussed above, the provision of the six-storey building would result in the provision of a narrow green link. This would not give the green link the prominence ascribed to it in the masterplan. <u>Architectural quality</u> 54. London Plan Policy D3 states that development proposals should be of high quality, with architecture that pays attention to detail, and gives thorough consideration to the practicality of use, flexibility, safety and building lifespan through appropriate construction methods and the use of attractive, robust materials which weather and mature well. 55. The architectural design of 2 Berol Yard has proposed a materials palette which complements the surrounding context. The use of brickwork incorporating a range of brick colours is generally supported. 56. The three-storey extension to Berol House is considered to be a sympathetic addition to the existing building, through the use of terracotta tiling to provide a cladded façade, with double-glazed windows. <u>Fire safety</u> 57. In line with Policy D12 of the London Plan the applicant has submitted a fire safety statement, prepared by a suitably qualified third-party assessor, AESG. This report	

	demonstrates how the development proposal would achieve the highest standards of fire safety, including details of construction methods and materials, means of escape, fire safety features and means of access for fire service personnel. It is noted that the tall residential building would be provided with two staircases. Haringey Council is required to secure the proposed measures within an approved Fire Statement. <u>Inclusive access</u> 58. Policy D5 of the London Plan seeks to ensure that new development achieves the highest standards of accessible and inclusive design (not just the minimum). The applicant has submitted design and access statement which ensured that the development: can be entered and used safely, easily and with dignity by all; is convenient and welcoming (with no disabling barriers); and provides independent access without additional undue effort, separation, or special treatment, and meets the requirements of paragraph 3.5.3 of Policy D5. 59. Haringey Council is required to secure the proposed measures with appropriate conditions. **Transport** <u>Healthy Streets TA and Active Travel Zone (ATZ) Assessment</u> 60. The applicant has provided a Healthy Streets TA and ATZ assessment as part of the submission document. The ATZ assessment has chosen several key routes from the site to an array of locations. However, it is recommended that amendments to the routes which should be carried out. This includes the inclusion of the nursery to the north of the site and exploring potential alternative routes to Cycleway 1. 61. It is also noted that the ATZ assessment has been carried out as a desk-based assessment. This method is no longer accepted, and it is requested that this is carried out on site as per TfL guidance.	

	62. Whilst the ATZ has highlighted some key improvements to the area, further scrutiny is required once the onsite assessment has been carried out. As part of the assessment, the applicant should consider routes to Cycleway 1 and assess whether it these meet the TfL Cycle Route Criteria and consider how the requirements could be met as a link. 63. Further discussions are required to consider the appropriate walking and cycling improvements that should be secured through legal agreement as necessary. <u>Vehicle, Pedestrian and Cyclist Access</u> 64. There are several proposed pedestrian access points to the site from Ashley Road and Watermead Way. The application site will link up with proposed Green Link and it will also provide a new access route through Berol House – referred to as Berol Passage. This should be secured with 24hr access via the appropriate mechanism. Vehicular access is gained from Gessner Lane, which is deemed acceptable, but TfL has concerns over the management of this space which is discuss further below. 65. TfL has concerns over cyclist access points and how the site integrates into the wider cycling network. This will be discussed further in the detailed comments to the London Borough of Haringey. <u>Trip generation and impact</u> 66. TfL requests that the applicant should conduct link load analysis of Tottenham Hale Station. The cumulative impact of all small-scale developments may cause major impact to the system. It is request that the applicant should provide the analysis based on NUMBAT 2019 data, with the scenarios of base, base + development and base + development + consented development. <u>Safeguarding and Infrastructure Protection</u>	

	67. The applicant should demonstrate that the relevant consultation and safeguards have been put in place to safeguard adjacent London Underground, TfL Buses and rail infrastructure. It should be show that this is being considered during construction and following completion of the development. <u>Car parking</u> 68. The applicant is proposing 7 blue badge parking spaces for 2 Berol Yard, which equates to 6 for the residential element and 1 for the retail element. This is London Plan compliant from the outset. However, the applicant has failed to identify potential future locations, should an additional 7% demand arise. The car parking for this element is located within an under croft; TfL requests further information on how this is accessed, particularly for the residential space. For Berol House the applicant is proposing 1 blue badge space which is policy complaint. 69. TfL also notes that there are interim parking arrangements as part of the proposal. TfL request further details on this element and in particular the retention of parking spaces. This should be provided via a Parking Design and Management Plan (PDMP) and this should be secured via condition. Furthermore, all future occupants should be exempt from resident and business parking permits, and this should be secured via s106 agreement. Clarification is also sought on the levels of proposed Electric Vehicle Charging Points (EVCP's), which should be provided in accordance with the London Plan minimums. <u>Cycle parking</u> 70. TfL has concerns over the quantum and design of the cycle parking. The quantum on the plans appears to be below London Plan minimum requirements. In addition to this, design does not accord with the London Cycle Design Standards (LDCS). Further detailed will be within the borough comments. Travel planning 71. The applicant has submitted an outline Framework Travel Plan for the site. Given the location of the site to public transport and potential links to the cycling network, it is	

	considered that the targets should be increased to reflect this. The final travel plan should be secured within the s106 agreement in accordance with London Plan policy T4. <u>Servicing</u> 72. The applicant has provided an outline Delivery and Servicing Plan (DSP) which shows all vehicles apart from refuse, servicing the site via two loading bays on Ashley Road and Watermead Way and swept path analysis has been provided. 73. It is noted that the application would result in the creation of a private road, referred to as Gessner Lane. Only refuse vehicles would be able to service the site using the road, however clarification is sought on the management of this space. The final DSP should be secured by planning condition. <u>Construction</u> 74. The applicant has provided an Outline Construction Logistics Plan (CLP). The plan should provide construction details including the expected number of trips, vehicle routing, working hours and practices. The applicant should commit to out of peak hours deliveries, particularly given the proximity of the site to Tottenham Hale Station. The applicant should also confirm the nearby bus stop will not be affected and confirm any potential footway closures. 75. The document should be secured by planning condition and TfL and other key London Underground Infrastructure colleagues should be consulted prior to any commencement of works. **Sustainable development** <u>Energy strategy</u>	

	76. The London Plan requires all major developments to meet a net-zero carbon target. Reductions in carbon emissions beyond Part L of the 2013 Building Regulations should be met on-site. Only where it is clearly demonstrated that the zero-carbon target cannot be fully achieved on-site a contribution to a carbon offset fund or reductions provided off site can be considered. 77. An energy statement has been submitted with the application. The energy statement does not yet comply with London Plan Policies SI2, SI3 and SI4. The applicant is required to further refine the energy strategy and submit further information to fully comply with London Plan requirements. Full details have been provided to the Council and applicant in a technical memo that should be responded to in full; however outstanding policy requirements include: • Be Green – demonstration that renewable energy has been maximised, including roof layouts showing the extent of PV provision and details of the proposed air source heat pumps; • Be Seen – confirmation of compliance with this element of policy, with compliance to be secured within the S106 agreement; • Energy infrastructure – further details on the design of district heating network connection is required, and the future connection to this network must be secured by condition or obligation; • Managing heat risk – further details to demonstrate the cooling hierarchy has been followed. 78. For the domestic element, the development is estimated to achieve a 81% reduction in CO2 emissions compared to 2013 Building Regulations. For the non-domestic element, a 46% reduction is expected. <u>Whole Life-cycle Carbon</u> 79. In accordance with London Plan Policy SI2 the applicant is required to calculate and reduce whole life-cycle carbon (WLC) emissions to fully capture the development's carbon footprint.	

	80. The applicant has submitted a whole life-cycle carbon assessment. The WLC assessment does not yet comply with London Plan Policy SI2 and the applicant should review and respond to the accompanying WLC template (to be issued separately). 81. A condition should be secured requiring the applicant to submit a post-construction assessment to report on the development's actual WLC emissions. The template and suggested condition wording are available on the GLA website. <u>Circular Economy</u> 82. London Plan Policy D3 requires development proposals to integrate circular economy principles as part of the design process. London Plan Policy SI7 requires development applications that are referable to the Mayor of London to submit a Circular Economy Statement, following the Circular Economy Statements LPG. 83. The Applicant has submitted a Circular Economy Statement which is welcomed. However, it does not appear that the Applicant has submitted the completed GLA CE template. 84. Without the completed GLA CE template, the submission is missing some of the reporting tables. The Applicant should submit the completed GLA CE template in Excel format in line with the requirements of the GLA guidance. 85. Where the Applicant has replicated several of the reporting tables within the written report, comments have been provided based on the information received to date. Please refer to the attached document for detailed comments. 86. It is noted that some narrative in the written report is guided by the previous guidance version (Draft for Consultation, October 2020). The Applicant should update this narrative to reflect the relevant Circular Economy principles per the adopted (March 2022) guidance and its accompanying template and tables.	

	87. It is welcomed that the Applicant proposes to retain and refurbish the existing building on the site however there is additional information required across a number of areas. 88. A condition should be secured requiring the applicant to submit a post-construction report. The template and suggested condition wording are available on the GLA website. <u>Digital connectivity</u> 89. A planning condition should be secured requiring the submission of detailed plans demonstrating the provision of sufficient ducting space for full fibre connectivity infrastructure within the development in line with London Plan Policy SI6. **Environmental issues** <u>Urban greening</u> 90. The proposed development presents a well-considered approach to integrating green infrastructure and urban greening. This includes the incorporation of biosolar green roofing which supports multifunctionality, in accordance with Policy G1 of the London Plan. The site forms part of a new green link within the Tottenham Hale District Centre Framework and it is positive to see the proposed design puts this into practice. 91. The applicant has calculated the Urban Greening Factor (UGF) score of the proposed development as 0.35. The Planning Statement sets out that the proposals are an equal mix of residential and commercial, therefore it is considered that this application meets the target set by Policy G5 of the London Plan. This should be treated as a minimum and any improvements to the quality and quantity of urban greening made where possible. 92. The applicant should confirm that there are no existing trees to be removed to facilitate the proposed development. The applicant should also clarify the number of trees proposed.	

	<u>Sustainable drainage and flood risk</u> Flood Risk Management 93. The site is located in Flood Zone 2. A Flood Risk Assessment (FRA) has been submitted as required under the National Planning Policy Framework (NPPF). The FRA adequately assesses the risk of flooding from pluvial, sewer and groundwater flooding, which is considered to be low. The FRA provided for the proposed development generally complies with Policy SI12 of the London Plan. 94. A Flood Warning and Evacuation Plan (FWEP) will need to be prepared (secured by condition) including consideration of the identified risk of reservoir flooding. Sustainable Drainage 95. Paragraph 8.4.8 of the drainage strategy proposes to restrict runoff to 5.7 l/s for the 100-year return period; however, paragraph 8.4.9 states the 'required attenuation to restrict the water flow to 17 l/s'; Microdrainage calculations in Appendix D use a restricted rate of 5.9 l/s. The proposed discharge rate needs to be consistent across the report and calculations. The proposed discharge rate should be restricted to the greenfield QBAR rate for all events up to the 100-year + 40% Climate Change. Correspondence with Thames Water confirming there is capacity to support the proposed flows should also be provided. 96. In terms of SuDS, the drainage strategy proposes green roofs, blue roofs and tree pits, which is welcomed. The strategy states that complexity, economic, and space constraints with the Proposed Development layout do not allow for the implementation of a rainwater harvesting system at the site. This is not considered appropriate justification. Every effort should be made to prioritise rainwater harvesting in line with the London Plan hierarchy.	

	97. The surface water drainage strategy for the proposed development generally complies with Policy SI13 of the London Plan. Water Efficiency 98. No water efficiency information has been provided for the proposed development. This is not in line with Policy SI5 of the London Plan. <u>Air quality</u> 99. An Air Quality Assessment has been prepared by WSP to accompany the planning application. The report has been reviewed and is of sufficient technical quality. However, the construction dust assessment has incorrectly labelled the magnitude of Trackout as 'large' instead of 'medium' based on 10 HDV outward movements and an unpaved road length of 50-100m. Whilst not correct, it is considered a conservative approach and thus acceptable. 100. The development is air quality neutral (London Plan Policy SI 1 (B) (2a). The development is compliant with London Plan policies: • The development is partially located within an AQFA, and the assessment results and conclusions imply the constraints and impacts on the AQFA have been considered (London Plan Policy SI 1 (B) (2d)). 101. The following conditions are recommended: • On-site plant and machinery must comply with the London Non-Road Mobile Machinery (NRMM) Low Emission Zone standards (London Plan Policy SI 1 (D)). • Measures to control emissions during the construction phase relevant to a medium risk site should be written into an Air Quality and Dust page 20 Management Plan (AQDMP), or form part of a Construction Environmental Management Plan, in line with the requirements of the Control of Dust and Emissions during Construction and Demolition	

	SPG. The AQDMP should be approved by the LPA and the measures and monitoring protocols implemented throughout the construction phase (London Plan Policy SI 1 (D)) <u>Biodiversity</u> 102. London Plan Policy G6 states that proposals that create new or improved habitats that result in positive gains for biodiversity should be considered positively. Policy G6 further states that development proposals should aim to secure net biodiversity gain. Trading rules should also be satisfied. 103. It is recommended the applicant provide quantitative evidence that the proposed development secures a net biodiversity gain in accordance with Policy G6(D). If biodiversity net gain is not achievable on the site, the applicant should review opportunities for biodiversity offsetting in consultation with the borough. 104. The applicant should prepare an Ecological Management Plan (EMP) to support long-term maintenance and habitat creation. The EMP should be secured by planning condition and approved, if the proposed development is granted planning consent. **Local planning authority's position** 105. Haringey Council planning officers are currently assessing the application. In due course the Council will formally consider the application at a planning committee meeting. **Legal considerations** 106. Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor	

	may decide whether to allow the draft decision to proceed unchanged; or, direct the Council under Article 6 of the Order to refuse the application; or, issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application (and any connected application). There is no obligation at this stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments. **Financial considerations** 107. There are no financial considerations at this stage. **Conclusion** 108. London Plan policies on office, residential development, affordable housing, design, transport, sustainable development, and environment are relevant to this application. Whilst the proposal is supported in principle, the application does not fully comply with these policies, as summarised below: • Land Use Principles: The development of this allocated, brownfield site for a high-density, mixed-use development is acceptable in principle. • Affordable housing: Overall, the affordable housing offering would comprise 35% Discount Market Rent housing, of which, 30% would be at London Living Rent levels and the remaining 70% at Discount Market Rent. With an appropriate tenure split between DMR and LLR the proposal is generally considered to be Fast Track compliant. • Urban design: Whilst the site is within a location identified as appropriate for tall buildings, there are some concerns about height, massing, separation distances and width of the green link, which indicates potential overdevelopment. • Transport: Further information on the strategic transport issues arising from this development will be required to ensure full compliance with the London Plan. • Sustainable development: Further information on Energy, Whole Life Carbon and Circular Economy is required to ensure full compliance with London Plan requirements. • Environment: Further information is required on sustainable drainage, air quality and biodiversity.	

	The GLA Officer subsequently commented following sight of the latest QRP comments: GLA Officers are now generally satisfied that the urban design considerations in relation to height, massing, separation distances are appropriately resolved. Nevertheless, a full assessment against Policy D9 (including functional and environmental impacts) should be provided within the planning committee report and will be considered by GLA Officers at Stage 2. The GLA Officer subsequently commented: The whole life carbon matters and circular economy matters are, on balance, considered to be largely addressed. Whilst some minor points have been raised within the attached spreadsheets, I am satisfied that these matters are acceptably resolved in this circumstance and no further work is required on behalf of the applicant team. I would recommend that the WLC Assessment Report (dated 25/05/2023) and the Detailed Circular Economy Statement (dated 25/05/2023) be included as an approved document on the draft decision notice.	
Greater London Archaeology Advisory Service (GLAAS)	<u>Assessment of Significance and Impact</u> Berol House and No.1 Berol Yard underwent historic buildings recording as a condition of the 2017 consent for conversion. The surviving loading hoist on the second floor of the south wing was identified as a significant feature. I recommend that the borough Conservation Officer's views be sought on the principle of the proposed impact on the historic fabric and the future of the loading hoist. I also recommend that the LPA secure measures for the public interpretation of the site's industrial history in an approved scheme, as encouraged by the London Plan. I would be pleased to advise the LPA further on this. The site lies in an Archaeological Area identified in the council's 2021 exercise, but I understand this work awaits adoption by LPA. I was not able to find an archaeological desk-based assessment accompanying the application.	Concern noted. The investigation can be carried out prior to development and any heritage assets found suitably displayed and recorded as necessary. Conditions and informatives achieve the asset protection.

	However, from a brief examination of superseded Ordnance Survey mapping, the site of the proposed new build appears largely undeveloped in the modern era. Its Enfield Silt geology preserve prehistoric and later activity elsewhere in the borough, including just to the south at Ferry Island and North Island. The First Edition OS shows a possible fossilised linear route, preserved as a parallel field boundaries and planting, crossing the site from Hale Farm which lies under Down Lane Recreation Ground, down to the Lea. <u>Planning Policies</u> NPPF Section 16 and the London Plan (2021 Policy HC1) recognise the positive contribution of heritage assets of all kinds and make the conservation of archaeological interest a material planning consideration. NPPF paragraph 194 says applicants should provide an archaeological assessment if their development could affect a heritage asset of archaeological interest. NPPF paragraphs 190 and 197 and London Plan Policy HC1 emphasise the positive contributions heritage assets can make to sustainable communities and places. Where appropriate, applicants should therefore also expect to identify enhancement opportunities. If you grant planning consent, paragraph 205 of the NPPF says that applicants should record the significance of any heritage assets that the development harms. Applicants should also improve knowledge of assets and make this public. <u>Recommendations</u> I advise that the development could cause harm to archaeological remains and field evaluation is needed to determine appropriate mitigation. However, although the NPPF envisages evaluation being undertaken prior to determination, in this case consideration of the nature of the development, the archaeological interest and/or practical constraints are such that I consider a two-stage archaeological condition could provide an acceptable safeguard. This would comprise firstly, evaluation to clarify the nature and extent of surviving remains, followed, if necessary, by a full investigation.	

	I therefore recommend attaching a condition as follows: **Condition** No demolition or development shall take place until a stage 1 written scheme of investigation (WSI) has been submitted to and approved by the local planning authority in writing. For land that is included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI, and the programme and methodology of site evaluation and the nomination of a competent person(s) or organisation to undertake the agreed works. If heritage assets of archaeological interest are identified by stage 1 then for those parts of the site which have archaeological interest a stage 2 WSI shall be submitted to and approved by the local planning authority in writing. For land that is included within the stage 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.	

	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. I envisage that the archaeological fieldwork would comprise the following: **Evaluation** An archaeological field evaluation involves exploratory fieldwork to determine if significant remains are present on a site and if so to define their character, extent, quality, and preservation. Field evaluation may involve one or more techniques depending on the nature of the site and its archaeological potential. It will normally include excavation of trial trenches. A field evaluation report will usually be used to inform a planning decision (pre-determination evaluation) but can also be required by condition to refine a mitigation strategy after permission has been granted. **Refer to Conservation Officer** As this proposal may affect a heritage asset of architectural, artistic, or historic interest so recommend that you seek the advice of your conservation officer. **Public engagement** A scheme of London Plan-compliant public heritage interpretation in public realm would be appropriate, secured through s106 and or design measures. I would be pleased to advise the LPA further on the industrial archaeological aspects of this	
Thames Water	Waste Comments There are public sewers crossing or close to your development. If you're planning significant work near our sewers, it's important that you minimize the risk of damage. We'll need to check that your development doesn't limit repair or maintenance activities, or inhibit the services we provide in any other way. The applicant is advised to read our	Noted, conditions and informatives included.

	guide working near or diverting our pipes. https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes Thames Water would advise that with regard to FOUL WATER sewerage network infrastructure capacity, we would not have any objection to the above planning application, based on the information provided. Following initial investigations, Thames Water has identified an inability of the existing SURFACE WATER network infrastructure to accommodate the needs of this development proposal. Thames Water has contacted the developer in an attempt to agree a position for foul water networks but has 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. “The development shall not be occupied until confirmation has been provided that either:- 1. All surface water network upgrades required to accommodate the additional flows from the development have been completed; or- 2. A development and infrastructure phasing plan has been agreed with the Local Authority in consultation with Thames Water to allow development to be occupied. Where a development and infrastructure phasing plan is agreed, no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan.” Reason - Network reinforcement works are likely to 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 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. The proposed development is located within 20m of a Thames Water Sewage Pumping Station. Given the nature of the function of the pumping station and the close proximity of	

	the proposed development to the pumping station we consider that any occupied premises should be located at least 20m away from the pumping station as highlighted as best practice in our Codes for Adoption . The amenity of those that will occupy new development must be a consideration to be taken into account in determining the application as set out in the National planning Policy Framework (NPPF) 2019 at paragraphs 170 and 180. Given the close proximity of the proposed development to the pumping station we consider that it is likely that amenity will be impacted and therefore object. Not with standing this objection, in the event that the Local Planning Authority resolve to grant planning permission for the development, we would request that the following informative is attached to the planning permission: “The proposed development is located within 20m of a Thames Water Sewage Pumping Station and this is contrary to best practice set out in Codes for Adoption (https://www.thameswater.co.uk/developers/larger-scale-developments/sewers-and-wastewater/adopting-a-sewer). Future occupiers of the development should be made aware that they could periodically experience adverse amenity impacts from the pumping station in the form of odour; light; vibration and/or noise.” 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. Water Comments Following initial investigations, Thames Water has identified an inability of the existing water network infrastructure to accommodate the needs of this development proposal. Thames Water have contacted the developer in an attempt to agree a position on water networks but have been unable to do so in the time available and as such Thames Water request that the following condition be added to any planning permission. No development shall be occupied until confirmation has been provided that either:- all water network upgrades required to accommodate the additional demand to serve the development have been completed; or - a development and infrastructure phasing plan has been agreed with Thames Water to allow development to be occupied. Where a development and infrastructure phasing plan is agreed no occupation shall take place	

	other than in accordance with the agreed development and infrastructure phasing plan. Reason - The development may lead to no / low water pressure and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development" The developer can request information to support the discharge of this condition by visiting the Thames Water website at thameswater.co.uk/preplanning. Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (telephone 0203 577 9998) prior to the planning application approval. There are water mains crossing or close to your development. Thames Water do NOT permit the building over or construction within 3m of water mains. If you're planning significant works near our mains (within 3m) we'll need to check that your development doesn't reduce capacity, limit repair or maintenance activities during and after construction, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes The applicant is advised that their development boundary falls within a Source Protection Zone for groundwater abstraction. These zones may be at particular risk from polluting activities on or below the land surface. To prevent pollution, the Environment Agency and Thames Water (or other local water undertaker) will use a tiered, risk-based approach to regulate activities that may impact groundwater resources. The applicant is encouraged to read the Environment Agency's approach to groundwater protection (available at https://www.gov.uk/government/publications/groundwater-protection-position-statements) and may wish to discuss the implication for their development with a suitably qualified environmental consultant. Supplementary Comments	

	Management of surface water from new developments should follow London Plan Policy SI 13 Sustainable drainage, subsection B (the drainage hierarchy). Typically, greenfield run off rates of 5l/s/ha should be aimed for using the drainage hierarchy. The hierarchy lists the preference for surface water disposal as follows; Store Rainwater for later use > Use infiltration techniques, such as porous surfaces in non-clay areas > Attenuate rainwater in ponds or open water features for gradual release > Discharge rainwater direct to a watercourse > Discharge rainwater direct to a surface water sewer/drain > Discharge rainwater to the combined sewer. Current surface water proposal is high for 1:1 and 1:30yr storm event.	
Transport for London	Comments are incorporated into the GLA response. However, the following further comments were received in relation to the WSP 'GLA Stage 1 – Response' dated 14th April 2023. <u>Healthy Streets TA & ATZ Assessment</u> 1. Yes, I way referring to the nursery to the north of the site, Bright Gem Nursery. It is acknowledged that there are highway improvements along Ashley Road to the junction of Burdock Road. However, the applicant has failed to include a nursery as part of the ATZ assessment, which residents of the site are likely to use. Without providing an onsite, on street assessment, it is poor standard to say that the existing situation is adequate. 2. With regards to the link from the site to Cycleway 1 – please can the applicant highlight this as it is not clear which route is being referred to. If this link does exist, as per the stage 1 comments, an assessment of the quality of this route should be carried out. 3. The applicant has failed to acknowledge that TfL do not accept desk-based ATZ assessment, and this should be carried out on site, and this will highlight any gaps and take in to consideration any commitment improvements already paid by the applicant. The ATZ assessment will allow TfL and the LB of Haringey to assess any potential improvements which will be in with the relevant planning tests where applicable.	Noted.

	Vehicle, Pedestrian and Cyclist Access 1. Access via Berol Passage should provide 24hr access 365 days a year and this should be secured via the S106. Additionally, TfL have concerns that 'permissive path rights' of access fall outside the Public London Charter with potential restrictions to access. All other routes should be public right of way, and this should be secured. Trip Generation 1. The request is in order to understand the various differing impact of the extant permission and proposed application. This development is likely to impact the transport network in a different direction to that of the previous application and this needs to be assessed and understood, therefore please provide a relative impact assessment in each direction. 2. With regards to the WFH situation, evidence from TfL Travel in London report https://tfl.gov.uk/corporate/publications-and-reports/travel-in-london-reports sets out the current observed position more generally. Our strategic models are based on longer term assumptions about home working, and planning decisions are based on that longer view. Also, there is a different people home working on the day of the Census, and emerging pattern of hybrid working as set out by TfL. Safeguarding and Infrastructure Protection 1. Noted. Car Parking 1. The applicant has failed to clarify access for residential and commercial blue badge spaces in the undercroft, for example would this space be open or be access via a remote control? 2. Note the provision for potential future blue badge spaces. Albeit the applicant should demonstrate how this public realm could be prevent from being used as 'informal' parking given the space. 3. The reduction in parking on site from existing tenants should be clarified.	

	4. Welcome the commitment to provide 100% active electric vehicle charging points. This should be secured appropriately. <u>Cycle Parking</u> 1. The design is noted, but the access to the long stay cycle parking is still deemed as being non LCDS compliant. <u>Travel Planning</u> 1. Noted. <u>Servicing</u> 1. Noted.	
London Underground/DLR Infrastructure Protection	Though we have no objection in principle to the above planning application, there are a number of potential constraints on the redevelopment of a site situated close to London Underground railway infrastructure. Therefore, we request that the grant of planning permission be subject to the following separate numbered conditions to be discharged in a phased manner as and when they are completed. 1. Before the pre-commencement/Site formation/Demolition stage begins, no works shall be carried out until the following, in consultation with TfL Infrastructure Protection, have been submitted to and approved in writing by the local planning authority. a) provide demolition details b) accommodate the location of the existing London Underground structures c) accommodate ground movement arising from the development construction thereof d) mitigate the effects of noise and vibration arising from the adjoining railway operations within the structures e) provide details on the use of tall plant/scaffolding for the demolition phase	Noted, conditions included.

	f) demonstrate that any EMC emissions from any plant or equipment to be used on the site or in the finished structure will not adversely affect LU equipment or signalling g) demonstrate that the design allows for any emissions from London Underground's tunnel, tracks and ventilation shafts or emissions from the proposed development h) written confirmation will be required from Thames Water/whomever that any increased drainage or sewage from the site will not be discharged directly or indirectly into London Underground's drainage system. 2. Before the sub-structure construction stage begins, no works shall be carried out until the following, in consultation with TfL Infrastructure Protection, have been submitted to and approved in writing by the local planning authority. a) prior to commencement of each phase of the development provide details of foundations, basement, and ground floor structures, or for any other structures below ground level, including piling (temporary and permanent) 3. Before the super-structure construction stage begins, no works shall be carried out until the following, in consultation with TfL Infrastructure Protection, have been submitted to and approved in writing by the local planning authority. a) provide details on the use of tall plant/scaffolding **Reason:** To ensure that the development does not impact on existing London Underground transport infrastructure, in accordance with London Plan 2021, draft London Plan policy T3 and 'Land for Industry and Transport' Supplementary Planning Guidance 2012 Your proposal is also adjacent to Network Rail and Crossrail 2. Please contact them directly to query what affect, if any, the proposal will have on the railway. *This response is made as LU/DLR Railway Infrastructure Manager under the "Town and Country Planning (Development Management Procedure) Order 2015". It therefore*	

	relates only to railway engineering and safety matters. Other parts of TfL may have other comments in line with their own statutory responsibilities	
Health and Safety Executive	Headline response from HSE – 'content' **Scope of consultation** 1.1. The above consultation relates to a relevant building of 30 storeys, with a maximum storey height of approximately 100m served by two staircases. 1.2. The fire statement states that the adopted fire safety standards are British Standards 9999:2017 and Draft BS9991:2021. It should be noted that the draft BS9991 is a consultation draft document which cannot be used as a design guide. HSE can only assess applications based on extant standards and, accordingly, has assessed the application in accordance with BS9991:2015. **Previous consultation** 1.3. HSE issued a pre-application advice note dated 26/09/2022 following a pre-application consultation meeting between the applicant and HSE held on 26/09/2022. 1.4. Following a review of the information provided with this consultation, HSE is content with the fire safety design, to the extent that it affects land use planning. *The following information does not contribute to HSE's substantive response and should not be used for the purposes of decision making by the local planning authority.* **Means of Escape** 2.1. Drawings show both staircases in close proximity opening into a shared lift lobby. The fire safety design standard, BS9991, states: 'Where two or more common stairs are provided they should be located such that they are situated remotely from each other.	The introduction of the additional stair and evacuation lift has resulted in the HSE being content with the proposals in terms of escape in the event of fire. The applicant has responded to these points and advises that they will develop the strategy as they move into more detailed design stages. The conditions would ensure that the commitments made in the submitted statements are realised.

	Where a common corridor connects two or more storey exits, measures should be provided to prevent both stairs from being affected by the smoke from a single fire'. 2.2. It will be for the applicant to demonstrate that both staircases can not be compromised by fire and smoke concurrently. In this instance, however, any necessary internal alterations are unlikely to affect land use planning considerations. This will be subject to scrutiny at later regulatory stages. 2.3. Similarly, section 7 of the fire statement indicates that evacuation lifts will be provided. It will be for the applicant to demonstrate that a tenable atmosphere will be provided for people waiting to use evacuation lifts. In this instance, however, any necessary internal alterations are unlikely to affect land use planning considerations.This will be subject to scrutiny at later regulatory stages.	
Natural England	Thank you for getting in touch about the above consultation, please find Natural England's response below. Natural England has no comment on this application with regards to designated sites. Natural England has not assessed this application for impacts on protected species. Natural England has published Standing Advice which you can use to assess impacts on protected species, or you may wish to consult your own ecology services for advice. Environmental gains Development should provide net gains for biodiversity in line with the NPPF paragraphs 174(d), 179 and 180. Development also provides opportunities to secure wider environmental gains, as outlined in the NPPF (paragraphs 8, 73, 104, 120,174, 175 and 180). We advise you to follow the mitigation hierarchy as set out in paragraph 180 of the NPPF and firstly consider what existing environmental features on and around the site can be retained or enhanced or what new features could be incorporated into the development proposal. Where onsite measures are not possible, you should consider off site measures. Opportunities for enhancement might include:	Noted

	• Restoring a neglected hedgerow. • Creating a new pond as an attractive feature on the site. • Planting trees characteristic to the local area to make a positive contribution to the local landscape. • Using native plants in landscaping schemes for better nectar and seed sources for bees and birds. • Incorporating swift boxes or bat boxes into the design of new buildings. • Designing lighting to encourage wildlife. • Adding a green roof to new buildings. Natural England's Biodiversity Metric 3.1 may be used to calculate biodiversity losses and gains for terrestrial and intertidal habitats and can be used to inform any development project. For small development sites the Small Sites Metric may be used. This is a simplified version of Biodiversity Metric 3.1 and is designed for use where certain criteria are met. It is available as a beta test version. Natural England's Environmental Benefits from Nature tool may be used to identify opportunities to enhance wider benefits from nature and to avoid and minimise any negative impacts. It is designed to work alongside Biodiversity Metric 3.1 and is available as a beta test version. Green Infrastructure Natural England's Green Infrastructure Framework provides evidence-based advice and tools on how to design, deliver and manage green infrastructure (GI) . GI should create and maintain green liveable places that enable people to experience and connect with nature, and that offer everyone, wherever they live, access to good quality parks, greenspaces, recreational, walking and cycling routes that are inclusive, safe, welcoming, well-managed and accessible for all. GI provision should enhance ecological networks, support ecosystems services and connect as a living network at local, regional and national scales.	

	Development should be designed to meet the 15 Green Infrastructure Principles. The Green Infrastructure Standards can be used to inform the quality, quantity and type of green infrastructure to be provided. Major development should have a GI plan including a long-term delivery and management plan. Relevant aspects of local authority green infrastructure strategies should be delivered where appropriate. GI mapping resources are available here and here. These can be used to help assess deficiencies in greenspace provision and identify priority locations for new GI provision. Access and Recreation Natural England encourages any proposal to incorporate measures to help improve people's access to the natural environment. Measures such as reinstating existing footpaths together with the creation of new footpaths and bridleways should be considered. Links to urban fringe areas should also be explored to strengthen access networks, reduce fragmentation, and promote wider green infrastructure. It is for the local planning authority to determine whether or not this application is consistent with national and local policies on the natural environment. Other bodies and individuals may be able to provide information and advice on the environmental value of this site and the impacts of the proposal to assist the decision-making process. We advise LPAs to obtain specialist ecological or other environmental advice when determining the environmental impacts of development. Your authority has a duty to have regard to conserving biodiversity as part of your decision making. Conserving biodiversity can also include restoration or enhancement to a population or habitat. Further information is available here.	
NHS North Central London	Thank you for consulting the NHS North Central London Integrated Care Board (NCL ICB) regarding the planning application HGY/2023/0261. The NHS Healthy Urban Development Unit supports the London ICBs engage in the planning process.	Noted, proportionate health contribution sought through S106 obligation.

We have reviewed the planning application and broadly welcome the proposal. However, we have significant concerns regarding the impact on health infrastructure. The Health Impact Assessment (Lichfields) submitted as part of the application documentation identifies the impact on health infrastructure as the only area where there is a clear adverse impact which requires mitigation. Paragraph 6.5 advises “this effect will be mitigated through CIL and/or Section 106 contributions to support existing healthcare facilities in the local area”. Unfortunately, the HIA only considered primary care rather than the full range of health infrastructure which will be impacted.

The NHS HUDU Planning Contributions Model (HUDU Model) as set out in Chapter 11 of the 2021 London Plan has been used to calculate the cost of mitigation for inclusion within the s106 agreement. The applicant refers to the development when complete accommodating 470 residents. However, in running the HUDU Model we have assumed that there will be a proportion of residents moving locally although new residents will be moving into those homes vacated. This may underestimate the new population with a figure of 335. Should the Council have local information regarding allocations policy and who is moving into the borough we could review this figure. The summary figures from the Model are included in the table below. We are not seeking the revenue costs although it is important to recognise that there will be additional revenue costs incurred by the NHS.

Final Summary	
Total Capital Cost	£547,397
Total Revenue Cost	£497,490
Combined Cost	£1,044,887
Total Number of Housing Units	210
Capital Cost Requirement Per Unit	£2,607

	Using information on the proposed housing mix in the Planning Statement, the model calculates the healthcare s106 requirement of £547,397 which includes primary care as well as acute and mental health capacity needs. However, with the planned space at the new Welbourne Centre it is hoped that additional capacity can be provided with reconfiguration and upgrading of existing sites, and therefore we ask for a minimum s106 contribution of £233,335 to “increase capacity of health infrastructure serving the proposed development”. In the event that further capacity is required from this and other schemes in this part of the borough we would welcome discussions with the Council in relation to potential CIL funding.	