

Appendix 2 – Plans and images

Aerial view

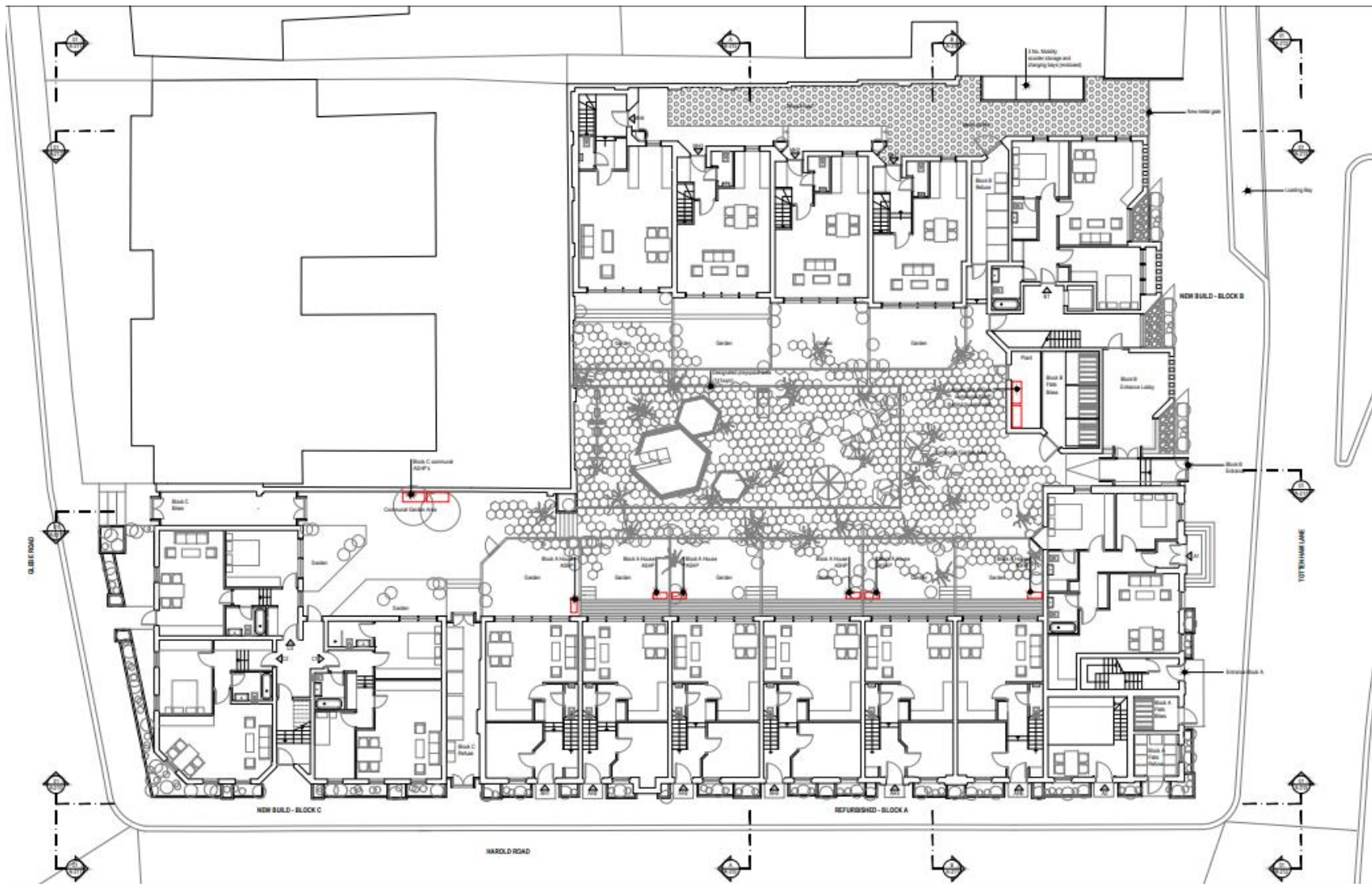


Aerial View Looking West

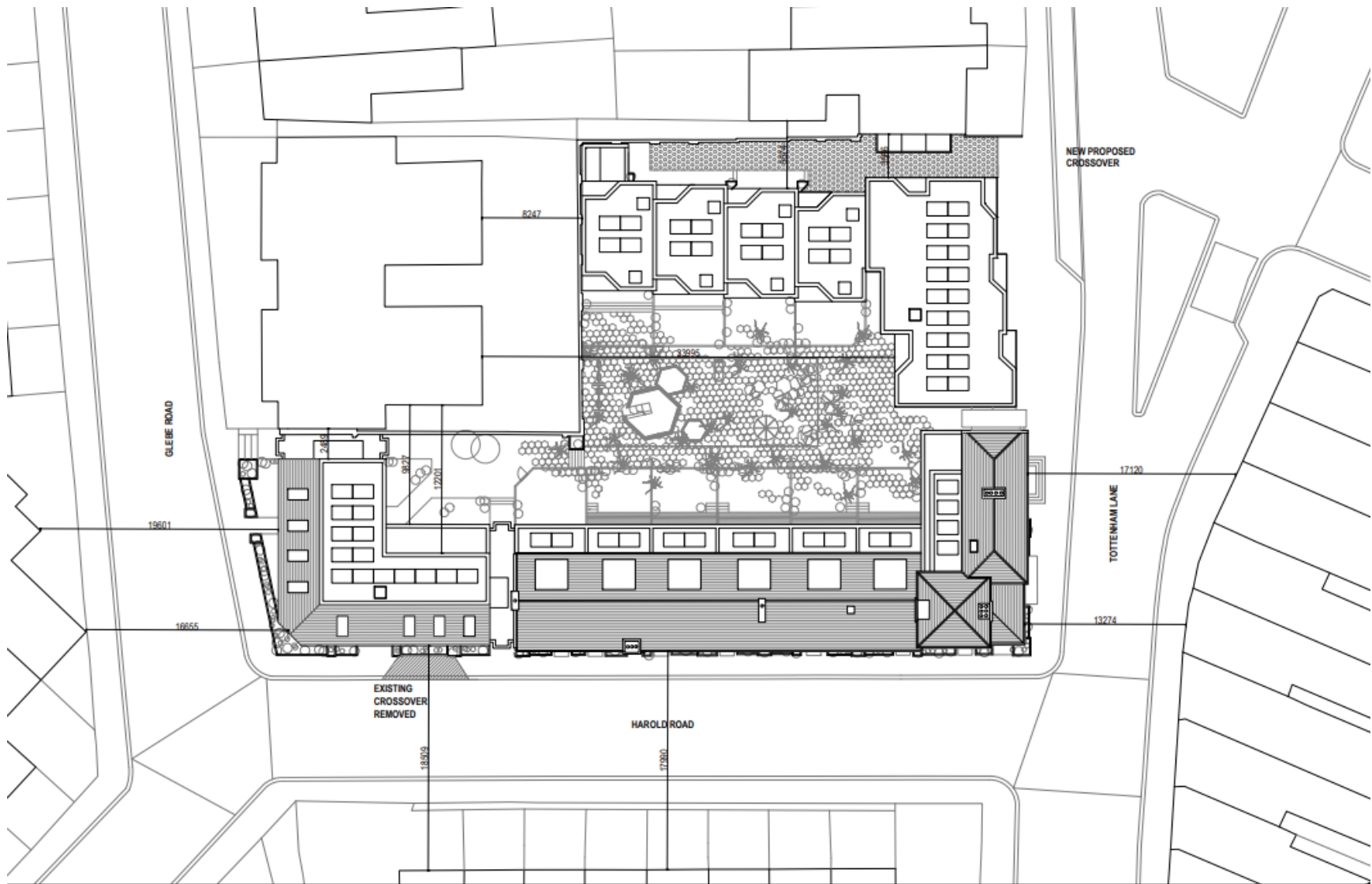


Aerial View Looking East

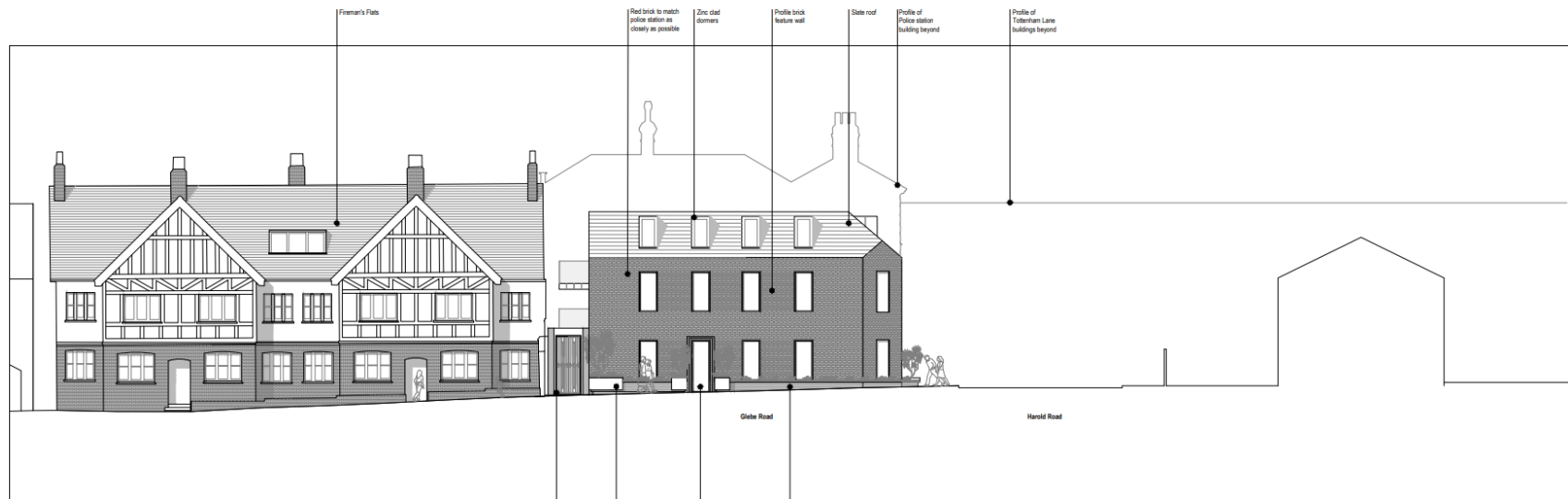
Proposed ground floor plan



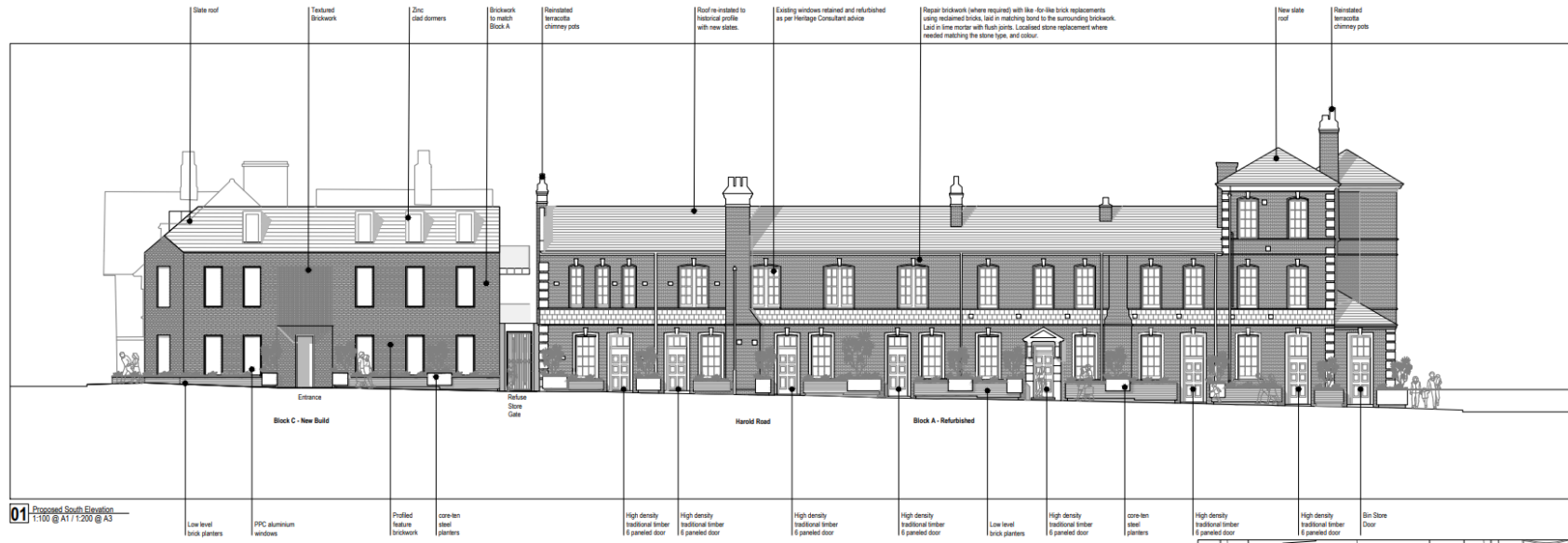
Proposed roof plan



Proposed west elevation



Proposed south elevation



CGI: Tottenham Lane



CGI: Mews Street



CGI: Block C Corner View



CGI: Landscaping



CGI: Nighttime View



Appendix 3 Consultation Responses from internal and external agencies

Stakeholder	Question/Comment	Response
INTERNAL		
Design	<p>Thank you for asking me to comment, I have been closely involved with this application all the way through the pre-application discussions, Quality Review Panels, and subsequent meetings, and am very familiar with the issues and constraints.</p> <p><u>Summary</u></p> <p>These proposals are a sophisticated and subtle response to what could be a challenging site, that achieves a design of exceptionally high quality, appropriate to context and promising to provide superb new homes. They bring back into use an architecturally notable former police station that acts as a local landmark, positive contributor to the conservation area and marker of a potentially attractive and important urban space. They then fill in the undesirable gaps at either side of the former police station in what promise to be striking, innovative, distinctive and unusual contemporary buildings that are nevertheless designed to complement their locations and settings on appropriate forms for their character. Provided sufficient quality is followed through in the selection of materials, design of details and quality of construction, this proposal has the potential to be an exemplary, award winning new residential development.</p> <p><u>Site Location, Principal of Development</u></p> <ol style="list-style-type: none"> 1. This application is for a site in the Hornsey neighbourhood of the borough of Haringey, just west of the centre of the borough. The site is a former police station, released by the Mayor's Office for Policing and Crime (MOPAC) in early 2021. MOPAC engaged Lambert Smith Hampton and Knight Frank to prepare a sketch proposal for development of the site for residential, and engaged Haringey Council planning department, including this design officer, in a pre-application meeting, following which officers confirmed that the site was considered suitable in principal for this sort of development. MOPAC's sketch proposal was for retention of the main 	Comment noted

existing building, converted to flats, and infill of new build housing, similar to this proposal, and was used to aid them in selling the site.

2. The site is located on the corner of Tottenham Lane, Harold Road and Glebe Road in Hornsey, to the West side of Tottenham Lane / north side of Harold Road / east side of Glebe Road. Tottenham Lane, an important street connecting Crouch End with Wood Green, splits at a small triangular public space in front of the site, with Church Lane continuing north and Tottenham Lane coming from the north-east, and immediately north of the site a row of large two/three storey terrace houses front Church Lane. A two/three storey flatted block known as Firemans Cottages, facing Glebe Road backs onto the north-west corner of the site, with flank walls and garden walls forming the site's northern & part of its western boundary. Tottenham Lane Local centre is located immediately east of the site including a shopping parade along Tottenham Lane opposite, and a further striking curved sopping parade to the north-east, enclosing the triangle where Church Lane splits off from Tottenham Lane, both with commercial units on the ground floor and residential flats on the upper floors.
3. The building on site is 'L' shaped in form (including "serifs"!) and comprises a retained part two storey, part three storey building known as Hornsey Police Station, primarily fronting Tottenham Lane, with a long lower wing fronting Harold Road. This was constructed in 1915, in a Baroque style by John Dixon Butler, architect to the Metropolitan Police. It is built in bright-red brick with decorative, molded brick and stone banding and window surrounds, six-over-six pane sash windows and a bold pedimented entrance inscribed 'POLICE'. It replaced an earlier police station of c1868 and originally formed part of a fine group of civic buildings including a public library, demolished in the 1960s after the library was relocated to Crouch End, and a fire station, also demolished, in what's now a gap between the police station building and the houses on Church Lane and at the corner of Harold Road. There are a number of ad-hoc single-storey structures contained within the service yard/car park which is accessed off Harold Road.

- | | | |
|--|--|--|
| | <p>4. The site is located within the Hillfield Conservation Area, which also includes the Firemans Cottages and all the other properties on Harold Road, but no other properties or spaces on Tottenham Lane, Church Lane or Glebe Road. The prominently sited Police Station building together with its tall red brick boundary walls, makes a positive contribution to the character and appearance of this part of the conservation area.</p> <p>5. The site is not a formal Site Allocation, as the whole of the site was in use as an active police station at the time the local plan was drawn up, but The Council agreed in response to the original MOPAC pre-application enquiry that the site is suitable for a residential conversion and infill development. The Conservation Area and heritage significance of the positive contribution made by the existing building are the main constraint on these proposals, and .</p> | |
|--|--|--|

Site Layout, Streetscape Character

6. The proposals would maintain and restore the main, monumental, original, three-storey police station building on the Tottenham Lane-Harold Road corner, as Block A, and the long, lower, two-storey wing down most of the Harold Road length of that side of the site converted to six townhouses, but demolishes various one and two storey ad-hoc later side extensions and outbuildings. A new four-storey block, Block B, matching the height of the original police station, would fill most of the gap between it and the first house (no. 1, actually converted into a hotel) on Church Lane. A narrow gap separates Block A & B, housing a lower communal entrance, with a wider gap between Block B & the White Lodge Hotel leading to a short private mews street, containing four new townhouses.
7. Block C is a new two-storey flatted block at the corner of Harold and Glebe Roads. Narrow gaps between Block C and the two storey existing wing to Block A, and Block C and the existing neighbouring Firemans Cottages, are filled with contrasting, single-storey infills housing refuse and bike stores. The three blocks, together with the two-storey existing wing behind Block A, the new mews houses behind Block B, and the back gardens wall of the neighbouring existing Firemans Flats therefore enclose a large

communal private courtyard amenity space, accessible to all residents of this development, yet secure from outsiders.

8. These proposals have a generally excellent, straightforward, direct and clearly legible relationship to the street, with existing and new buildings completely lining the surrounding streets, leaving no spaces that are of ambiguous ownership or purpose, and with front doors to the three flatted blocks, the converted townhouses along Harold Road and two of the ground floor flats (one each in Block A & C), having front doors facing and opening off the street, generally behind short defensible space front gardens, with all stretches of street around the site animated and passively surveilled by at least one front door as well as several ground floor habitable room window, generally to a living room or kitchen.
9. The one new street created by this development is the mews street on the northern edge of the site, but this is a very short street, just providing access to the four new townhouses behind Block B. This can be gated to maintain security, but even if entered it could not provide access to the rear of any properties, as the end mews house “wraps around” the end of the mews, which also adds to passive surveillance of the mews street from these houses, as well as all the passive surveillance from the rest of the mews houses and corner flats in lock B, so the only neighbouring property bordering the mews, the White Lodge Hotel at no. 1 Church Lane, has an existing high brick boundary wall.

Height, Bulk & Massing

10. The Height, Form, Bulk & Massing of this proposal take strong cues from the immediate surrounding context, which, given that the wider neighbourhood is characterised by consistency of building height, means it also follows closely the wider neighbourhood context. The retained main police station building is if three storeys, but is a tall three storeys, with high floor to ceiling heights, particularly of the ground floor that is also raised some four steps above pavement level. The neighbouring block B matches

its height to its eaves, but using consistent standard floor to ceiling heights and a lower ground floor level, comfortably fits four floors into that height.

11. Matching the existing police station's height is appropriate as there was previously a library and fire station of similar height and monumentality to the police station in what later became the gap. It is also appropriate as Tottenham Lane is an important street, with retail activity, busy traffic and regular busses, and what is more, opens out at this point with the modest triangular public space formed by Church Lane splitting off Tottenham Lane, bounded on its other two sides with retail parades. Although the police station holds the corner, the west side of this triangle is currently somewhat weakly enclosed, with the gap and the lower, two storey houses of 1-8 etc Church Lane, albeit that they are larger, grander than normal two storey houses, with raised ground floors, large front-facing gables and inhabited roofs. The height difference between the four storeys of Block B and 1 etc Church Lane will therefore also be a modest one additional storey.
12. In bulk and massing, Block B also matches that of the retained Block A, and is similar to those of the shopping parades on Tottenham Lane. Its flat roof is an expression of its contemporaneity, contrasting with the prevalent local pitched roofs locally, but is not completely out of character where some of the shopping parades have high parapets, and even the police station itself has a shallow pitched roof which can barely be seen from the street. It also allows its overall height to remain below those of its neighbours, even those a whole to storeys lower. The mews houses that run off the back of Block B follow its form but step down to three floors, and each house steps down another 300mm or so than the previous one, as the mews street itself gently slopes down, so that the last mews house's height is lower than the Firemans Cottages that back onto the end of the mews.
13. Going around the side, into Harold and Glebe Roads, the existing context is generally a more modest two storeys, with a particularly modest 1970s terrace on the opposite side of Harold Road and two storey Edwardian

houses on Glebe Road, albeit with inhabited roofs, front facing dormer windows and in the case of the immediately adjacent Firemans Cottages, large front-facing gables. The retained rear wing along Harold Road is also of two storeys, and therefore the new Block C on the corner of Harold and Glebe Roads, at two storeys, with modest minimalist front facing dormer windows, modestly matches the neighbours' height, bulk and massing. This also appropriately expresses the more residential, side street character of Harold and Glebe Roads. The bulk and height of the proposals onto the internal private communal courtyard reflects those of their street frontages, except that the two storey existing and proposed Harold and Glebe Road frontages become three storey to their rear, but this is essentially a private experience.

Block & House Form, Rhythm & Fenestration

14. With a large part of the development existing retained buildings, the dominant block and house form from the key corner of Tottenham Lane to most of its length along Harold Road is the monumental existing police station, with its regularly spaced identical, vertically proportioned sash windows interspersed with tall, decorated doorways. The applicants have chosen to emphasise their retention by designing the two new blocks to contrast with the existing in their detailed design, whilst following their height, bulk and aspects of their rhythm and proportions, and to do this in two contrasting manners that express their different locations and contexts. Block B, facing Tottenham Lane and the triangular public space, is designed following a “weaving” concept that celebrates its location on a vibrant place in the public realm, whereas Block C follows a “minimalist” design respectful of its quiet residential hinterland street location.
15. The “Weaving” concept takes design inspiration from template patterns from Victorian looms, a design concept from the age of the construction of the police station and its surroundings, but uses it in a totally contemporary design that nevertheless maintains the richness of decoration and detail and animation to the street front found in other residential buildings along Tottenham Lane and other Victorian-Edwardian high streets. The

“chequerboard” effect references and emulates the scale of the projecting porches, bay windows and dormers of surrounding Edwardian residential terraces and retail parades, whilst the overall composition is organised into three bays, matching the rhythm of the terraces of houses and retail parades. The chequerboard composition incorporates staggered balconies and planters to provide privacy to habitable rooms, further variation and greening opportunities, whilst the window pattern is predominantly of tall, thin windows matching those of the existing police station. The design approach is continued into the mews houses, where it further helps provide privacy to residents whilst providing passive surveillance.

16. The “Minimalist” design of Block C provides a far more calm, restful, domestic, side-street approach, with windows again matching the existing building but in a regularly spaced pattern. The communal entrance is marked by a deep angled brick recess with patterned brickwork above, animating Block C’s southern elevation, and with a corresponding but more modestly detailed front door to the ground floor flat animating its western elevation. The corner is simply faceted, with a mini gable addressing the diagonal route Harold Road takes after the Glebe Road junction. The roof, including its dormer windows, aligned with the main windows below, is in contrasting slate colour typical of the neighbourhood, but again detailed minimally with a secret gutter.
17. There is a fourth family of architectural forms in the development, after the existing Block A, woven Block B and minimalist Block C, in the “gateway-type” objects that fill the gaps. A tall, thin, between A & B provides the entrance to Block B and an entrance and view through to the central courtyard, and allows the level differences between pavement level and internal floor levels to be resolved. A second, between Blocks A and C, and a third between Block C and the neighbouring Firemans Cottages, provide refuse and cycle stores respectively. Each are designed to be robust metallic objects, in contrast to the brick of the existing and new buildings, and can be seen as of the same family as the gate over the mews entrance between Block B and no. 1 Church Lane. They also

provide roof terraces to the adjacent flat, and those in Block C also feature an additional cantilevered glass balustraded balcony to the adjacent second floor flat, between the two gables.

18. Finally, to the courtyard, to which all blocks face and open out in different ways but providing equal access to this shared communal private resource (albeit that the four flats converted from the main building of the police station would use fobs). All the new family houses, whether the four new ones in the mews street or the six converted from the rear wing to the Police Station, have generous private gardens, off which their family living-dining-kitchens open, as well as first &/or second floor balconies look down onto, which then open not the communal garden, whilst the communal entrances to Blocks B and C continue directly through to the communal courtyard, incidentally also providing a glimpse of this green oasis from the street.

Materials & Detailing

19. Brick is the dominant material, and will be a consistent red brick to match both the existing police station and other neighbouring buildings, so it should be a warm red brick with some moderate variation. It will, however, need to be conditioned, to be agreed before construction in consultation with Officers, as is to be expected. But the brick is detailed differently in each of the three blocks.
20. Block A, the converted existing, is a sensitive conversion to the front and side facing the street, with existing doors retained and used for flat entrances, bins and bike doors, and new doors sensitively inserted were required to the Harold Road side only to match existing in place of existing windows. Whilst the rear of Block A has greater modifications to replace removed outbuildings and lean-tos and provide sufficient residential accommodation, garden patio doors, a 2nd floor roof terrace for one of the flats and privacy between flats and houses in the internal corner; new build elements at the rear are detailed simply and plainly to not compete with the retained existing elements.

21. To Block B and the mews houses, the “weaving” pattern is expressed in projecting and recessed brick panels, some in patterned “hit & miss” brickwork, especially to the ground floor street frontage, to provide a robust, “rusticated” base, to give privacy to habitable room windows, especially bedrooms, and so the first floor windows read as matching the ground floor windows of the retained police station. Careful detailing of communal entrance, overhangs, projections, parapets, soffits, balcony and planter edges will be required and large scale (1:10 or 1:5) details of these should be required by condition.

22. Block C is detailed to be “minimalist”; using the same brick but with an invisible gutter and plain, slender cheeked metallic dormer windows. The metallic “gate-like” structures in the gaps between blocks will also require their metal and glass components to be specified and shown to be sufficiently functional and robust to suit their purpose, where impact damage and privacy concerns are a factor. Roof material is also to be decided, and large scale (1:10 or 1:5) bin store, bike store, balcony, gutter, ridge, dormer window and balcony details should be required to be conditioned.

Residential Quality (flat, room & private amenity space, size, quality, privacy and aspect)

23. All maisonette, flat and room sizes comply with or exceed minima defined in the Nationally Described Space Standards, as is to be routinely expected. All flats and houses are at least dual aspect, many triple, all with at least one sunny southerly or westerly aspect

24. Generous private gardens are provided to all houses, and balconies are provided to most flats, but many are north-facing, not all are of sufficient size to meet London Plan requirements, this has not been some flats to the retained converted existing building and to the outside corner of Block A, where the only possible place for a private balcony would overlook the street. However all flats have access to the generous landscaped shared

private communal central courtyard, which provides landscaped relaxation and childrens play space to more than meet needs and requirements.

25. The only existing residential neighbours in close proximity are the flats of Firemans Cottages. There will be some overlooking between these flats and the new dwellings, but distances are generally reasonable. One first floor bedroom window and one second floor living room window in the north side of Block C will be some 12m from the side wall of the rear wing of Firemans Cottages, which contains windows at ground and first floor, although they appear to be to kitchens and/or bathrooms. Their main habitable room windows appear to face the street or be east facing in the main building or rear gable of their back projection, which will have a long space of some 42m or 34m respectively. Furthermore, their outlook onto the communal landscaped courtyard will be a considerable improvement on the previous working yard to the police station.
26. The layout of the proposals is also careful to avoid overlooking between homes within the development with the narrowest distance between windows or balconies across the communal courtyard being over 18m, which is considered to be the maximum distance at which a face can be recognised, and is therefore considered sufficient distance to confer privacy. Furthermore, windows close to internal corners are avoided to avoid flanking privacy concerns. Considering the density of residential accommodation in and around the site and the complexity of this design, it is further testament to the quality and sophistication of this proposal that it creates no privacy concerns.

Daylight and Sunlight

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

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

	<p style="text-align: center;"> <i>a. Provide appropriate sunlight, daylight and open aspects (including private amenity spaces where required) to all parts of the development and adjacent buildings and land;</i> <i>b. Provide an appropriate amount of privacy to their residents and neighbouring properties to avoid overlooking and loss of privacy detrimental to the amenity of neighbouring residents and residents of the development...</i> </p> <p>28. The applicants provided Daylight and Sunlight Report on their proposals and of the effect of their proposals on neighbouring dwellings. These have been prepared fully in accordance with council policy following the methods explained in the Building Research Establishment’s publication “Site Layout Planning for Daylight and Sunlight – A Guide to Good Practice” (2nd Edition, Littlefair, 2022), known as “The BRE Guide”.</p> <p>29. The assessment finds that the impact of the development on existing neighbouring residential properties is very favourable for both daylight and sunlight, with only two windows and no rooms to neighbouring existing residential properties found to lose a noticeable amount of daylight, and no neighbours losing a noticeable amount of sunlight. This can be considered an exceptionally benign impact on neighbours, given that much of the site has been an open air car park and yard for many years, giving those existing neighbours better day and sunlight than Londoners would normally expect.</p> <p>30. The applicants’ assessment also finds that all the proposed dwellings in the development would achieve good levels of daylight to the proposed dwellings. This again is an exceptionally good result, given that most new developments in London struggle to reach the BRE Guide standards, which are written with low density, suburban patterns of development in mind. Therefore, full compliance with the BRE Guide is not to be expected and the fact that it is achieved here is considered an excellent performance.</p>	
Conservation	Comments dated 28/10/2022	Comment noted

Built Heritage Advice pertaining to an application for: Retention of existing Police Station building (Block A) with internal refurbishment, rear extensions and loft conversions to create 6 terrace houses and 4 flats. Erection of two buildings comprising of Block C along Glebe Road and Harold Road to create 8 flats and erection of Block B along Tottenham Lane and towards the rear of Tottenham Lane to create 7 flats and 4 mews houses including landscaping and other associated works.

The proposed development site (the Site) is located within the Hillfield Conservation Area and is occupied by Hornsey Police Station, which is no longer in use.

After the junction with Glebe Road, fronting Tottenham Lane, Hornsey Police Station is a three-storey building constructed in 1915 in a Baroque style to the designs of John Dixon Butler, architect to the Metropolitan Police. It is constructed of red brick with terracotta banding and window surrounds, six-over-six sash windows and a bold pedimented entrance inscribed 'POLICE'. It replaced an earlier police station of c.1868 and originally formed part of a fine group of civic buildings including a public library, demolished in the 1960s after the library was relocated to Crouch End, and a fire station, also demolished.

The Site is considered to make a positive contribution to the streetscape and wider conservation area. Whilst new-build development on the Site is supported, how it fits into its surrounding historic environment will be key to its success.

The amended proposals have largely addressed the concerns previously cited by the Council's Conservation Area. However, it is not considered that the amendments to the design of Block B fronting Tottenham Lane are sufficient to overcome concerns that the frontage may appear alien in its surroundings.

The proposed design, whilst well-designed and articulated, is overly-busy when considered in the immediate environs of Hornsey Police Station and would detract from its prominence and visual dominance within the streetscape and wider conservation area.

As such, it is considered that the proposals fail to preserve or enhance the character and appearance of the Hillfield Conservation Area, contrary to Paragraph 206 of the National Planning Policy Framework (NPPF).

A simpler frontage which is visually subservient to the adjacent police station mitigate the adverse impact on the heritage asset.

As such, it is considered that the proposals fail to preserve or enhance the character and appearance of the Hillfield Conservation Area, contrary to Paragraph 206 of the National Planning Policy Framework (NPPF).

Comments dated 03/07/2023

The amendments to Block C are welcome and it is now considered to preserve the character and appearance of Hillfield Conservation Area, in compliance with Paragraph 206 of the NPPF.

In terms of Block B, it is my view that the harm would be 'less than substantial', making Paragraph 202 of the NPPF relevant. If we consider this harm in the scale of lower, middle, and upper, it is my view that the harm to the heritage asset would be at the lower end of the scale.

With the exception of the low levels of 'less than substantial' harm arising from Block B, the remainder of the scheme is considered to preserve the character and appearance of the conservation area.

	<p>Overall, I consider paragraph 202 to be engaged and so the LPA must weigh the public benefits of the proposals against the low levels of less than substantial harm.</p>	
<p>Transportation</p>	<p>This application seeks to redevelop the redundant police buildings at this site for a residential development comprising 29 units.</p> <p><u>Location and access</u> This site is located on the corner of Harold Road and Tottenham Lane in Hornsey, to the north side of Harold Road/West side of Tottenham Lane.</p> <p>It currently has a PTAL of 3, considered 'moderate' access to public transport services. 5 different bus services are accessible within 3 to 5 minutes' walk of the site, and Hornsey Railway Station is a 5 to 6 minute walk away.</p> <p>It is however noted that the 2019 PTAL value of the site is detailed as level 4, looking at the outputs from TfL's WEBCAT website, it does appear that the difference in value is from a reduction in reported train services calling at Hornsey station. The PTAL report for 2021 doesn't include services running to Stevenage, however checking the Great Northern timetable, services to Stevenage do operate to and from Hornsey and therefore it could well be that there is an error leading to the reduced PTAL value reported by WEBCAT. A PTAL of 4 is acceptable.</p> <p>The site is also located within the Hornsey South CPZ, which has operating hours of 11.00 to 13.00 Monday to Friday.</p> <p><u>Development proposals</u> The existing buildings comprise a three storey office redbrick corner building fronting on to Tottenham Lane and Harold Road, as well as a two-storey red-brick building along Harold Road. There is also a car parking area internal to the site and highway access off Harold Road.</p>	<p>Observations have been taken into account. The recommended legal agreement clauses and conditions attached.</p>

The Metropolitan police were former occupiers and vacated the buildings in 2021. This use was previously observed to generate some on street parking demands and had number of on street car parking bays allocated for the sole use of police vehicles.

The proposal in this application is to convert the Former Police Station into 4 self-contained flats and 6 Terraced houses (Block A, Three Storeys), and construct a new residential building to contain 7 self-contained flats and 4 houses (Block B, Three Storeys to the rear and Four Storeys fronting Tottenham Lane) and a third building that will house 8 Flats (Block C 3 Storeys).

The breakdown of units is as follows;

- 6 No. 1 bedroom flats
- 11 No. 2 bedroom flats
- 2 No. 3 bedroom flats
- 6 No. 3 bedroom houses
- 4 No. 4 bedroom houses

29 new residential units in total.

There is no onsite car parking proposed, the applicant has provided (long and short stay) cycle parking to meet the requirements of the London Plan.

Transportation considerations

This is a 29 unit residential proposal, proposed as a car free development. A Transport Assessment accompanies the application, and there are a number of transportation characteristics to consider and discuss. These are as follows;

Access arrangements

As commented earlier, this is proposed as a car free development, so the existing vehicle crossover off Harold Road will be able to be fully reinstated and full height kerb and footway provided. Changes to the on street waiting and loading restrictions are also proposed and these are discussed later in this response. The

applicant will fund these changes and enter into a Section 278 Agreement with the Highway Authority to cover all of the associated physical works and administrative processes and procedures for the necessary changes.

Pedestrian and cycle access to the new units will be possible from the frontages to both Harold Road and Tottenham Lane.

There will be no internal facility for receiving delivery and servicing vehicles. The applicant has proposed conversion of the existing 'Police' bay on Church Lane/Tottenham Lane side of the site to a formal loading bay.

Proximity to local shops, services and facilities

The TA details the facilities that within walking distance of the site, it is considered that the site is quite well placed for foot access to local shops, services and facilities.

Hornsey High Street and Crouch End are accessible within around 8 and 12 minutes walk of the site, and banks, pharmacies, GP's, schools and local parks are within or less than this walk time/distance from the development, many within 8 to 10 minutes walk.

There are informal pedestrian crossing facilities in the locality of the site, in particular a raised table crossing of Church Lane which is on the foot route from the site towards Hornsey Station. In terms of formal cycling facilities in proximity of the site, there are on carriageway cycle lanes along parts of Tottenham Lane and signage directing towards LCN 7.

Parking considerations

As commented earlier this is proposed as a car free development. It is expected that additional parking demands will be generated by this proposal, given there will be 29 new units, and that 12 will be 'family sized' as in 3 or 4 bedrooms. The development proposal will require the implementation of 3 disable car parking

spaces on the public highways for the use of the development this is covered later in the report.

Existing parking conditions in the locality of the site

The applicant has included the results of a parking stress survey within their TA. This was carried out to accord with the requirements of the 'Lambeth' methodology.

The results were considered for the standard 5m car length and for a 6m car length sensitivity which represents the worst case scenario.

The stresses recorded within the survey area over two nights varied from 81.2% based on a 5m car length, to 86.8% when considering a 6m car length. Generally, once a parking stress is recorded in the range of 85% plus it is considered that an area is 'stressed' in parking terms.

The survey also recorded the overall numbers of available spaces within the survey area, which is another consideration alongside the parking stress level. There were 82 spaces available out of the 437 in the survey area on average (5m car length calculation) and 54 spaces if considering a 6m car length.

The survey recorded stresses and spare space availability on individual streets within the survey area, and most of the spare/available spaces were located on Harold Road and Tottenham Lane, with others recorded on all the streets within the survey. We have therefore concluded that although this area is suffering from high car parking pressure based on the worst case scenario there are a number of spaces available within the local area.

Potential parking demands

The 2011 census recorded average car ownership per household within the Hornsey Ward at 0.59 vehicles per household. Whilst it is acknowledged that car ownership has declined since this census, with the family sized houses and flats in particular there would be new parking demands expected to materialise.

The TA predicts (based on the historic census information) that new car parking demands for potentially 19 vehicles will materialise. However, the actual figure for potential new parking demands is expected to be lower than 19 cars for several reasons.

Firstly, the whole development will be formally permit free and car free via S106, so no permits would be issued to occupiers. Whilst the CPZ is only in force for two hours a day, this would to a degree acts as a deterrent.

Secondly, high quality cycle parking and good proximity to local shops and services would likely drive down the demands for car usage and ownership.

Thirdly, there will be a travel plan, and this includes measures such as personalised travel planning, provision of information on public transport, walking and cycling routes, and associated with the Travel Plan will be a car club facility, which are known to reduce vehicle ownership and private car journeys when provided for new developments.

The welcome pack for new occupiers will also include a £200 Voucher than can be used for purchase of or towards healthy lifestyle and active travel equipment such as walking and cycling accessories and the like. The Travel Plan also proposes provision of two travel Zones 1 to 6 travel cards for each residential unit for a year to encourage and embed use of public transport.

Potential increases in parking stress

The TA considers an uplift of 19 vehicles seeking to park in the locality of the site, and details that (based on a 5m car length) stresses could increase from 81.2% to 86.9%, which would result in 57 spaces remaining available within the 200m walk distance of the site. If considering the 6m sensitivity, stresses would increase to 92.9% with 29 spaces remaining available. These figures also include an anticipated 7 additional on street demands arising from recently consented applications in the locality that could add to local parking stresses.

As commented earlier Transportation do consider that the likely new demands that could arise should be lower than the 19 vehicles predicted by the TA which is considering a 'worst case' scenario.

Blue badge parking

There are three accessible units within the development, this aspect with respect to parking is discussed below.

The London Plan details that accessible units should be provided with 3% parking from the outset and the development should have the ability to provide 10%, i.e., a blue badge parking space for each residential unit. The Plan also comments that disabled parking for accessible units must be for resident's use only.

Ideally, the blue badge parking provision for the accessible units at this development would be located within curtilage. With the initial iteration of this development during the pre-application process this was the case, however as the project developed the amenity space considerations and advice from QRP steered the development towards being a car free proposal.

Initially concerns about not locating the blue badge parking for the disabled units within curtilage arose as they would not have been able to be allocated as per London Plan requirements to these occupiers. Also, the demands being on street would take up on street bays.

However, Haringey now operate a scheme whereby residents/occupiers can apply to have a designated on street blue badge bay. There are requirements relating to status and levels of PIP/DLA received. Occupiers of the three accessible units will be able to apply should they meet the criteria, and the applicant enters into a S.278 agreement for the provision of the proposed disable car parking pay. The allocation of the car parking spaces must be done via a parking management plan, which must be submitted to the Council for approval before the development is occupied.

Secure scooter storage for accessible unit occupiers

The applicant is also going to provide within curtilage secure scooter charging and storage.

An external secure scooter store/charging facility has been proposed for location within the gates of the Mews area to the development. The updated proposed ground floor plan in Annexe 2 shows these located to the north east corner of the site.

No details of the proposed unit are provided, and the commentary in this note doesn't detail how these are located with respect to the location of the accessible units within the development.

Assuming these are to be located in the optimum position for the occupiers of the accessible units, full dimensional details of the intended system/storage to be used and charging facilities will need to be clarified and confirmed, and this can be done by condition.

Summary of car parking considerations

With a PTAL level of 4 this development does meet the criteria of policy DM32 for formal designation as a car free/permit free development. Should this development eventually be consented and built out, it will be appropriate that it is formally designated as car free/permit free and the applicant will need to enter into a S.106 legal agreement to formalise this and meet the Council's administrative costs.

This development will create additional on street parking demands compared to present, the TA details this could be up to 19 vehicles however it is expected the actual demands will be lower given permit free status, a travel plan, car club provision and high quality cycle parking. Nonetheless, the locality of the site does already experience high parking stresses so transportation do consider and recommend that the applicant provides measures to further reduce the potential

car trip and parking demands arising from it, these will include to make financial contributions towards improving the accessibility of the site by active and sustainable modes, along with funding a 5 year provision of a car club facility for residents at the development.

Highway changes associated with the development

The applicant has proposed a revised highway arrangement at the site to suit this new development, which takes into account the reinstatement of the redundant crossover and reconfiguration of the on street waiting and loading arrangements.

Associated with the former Police Station operation was a long continuous 'Police' only parking bay running along Harold Road, this has been removed and 'standard' CPZ bays are now in place.

The proposed arrangement includes retention of the 'Doctor' parking bay and the provision of 4 blue badge bays, along with conversion of the 'Police' bay on Church Lane to a Loading bay. The existing blue badge bay on Harold Road has been retained along with the three new bays proposed for this development. Compared to existing arrangements there will be a light reduction in kerbside 'pay and display' space compared to present.

In order to implement this arrangement, the applicant will need to enter into a S278 agreement with the Highway Team within the Council and meet all of the Council's costs.

Cycle parking

To meet London Plan numerical requirements for long and short stay cycle parking, 56 long stay and 2 short stay cycle parking spaces are required. The applicant is proposing 68 long stay and 4 short stay albeit the short stay are not within the development curtilage.

For each of the house units in Block A the rear garden of each unit will accommodate a cycle storage unit for two cycles, whilst for each of the house

units in Block B an appropriately-sized internal dedicated cycle storage area with supporting locking mechanisms for two cycles would be provided.

For the flats within the development, there will be communal cycle parking storage provided with a store in each block. For blocks A and B two tier storage plus Sheffield Stands that can accommodate larger/oversize cycles will be provided, and for block C it is proposed for a wall mounted cycle parking/storage arrangement.

4 Sheffield stands will also be provided within the secure communal garden area for residential cycle parking, the TA comments these could accommodate oversize and larger cycles and would be an additional facility to the Sheffield Stands within the communal storage for blocks A and B.

The applicant also proposes provision of two Sheffield Stands for visitor cycle parking, that will be located on the Church Lane side of the development adjacent to the footway, within the public realm. These will be within the curtilage of this development and not on the public highway.

The numbers of long and short stay cycle parking spaces do meet the numerical requirements of the London Plan for Long and short stay cycle parking.

Full dimensional details demonstrating the proposed arrangements accord with the London Cycles Design Standards as produced by TfL will be required, this can be covered by a pre commencement condition.

Refuse and recycling storage and collection arrangements

The bin stores are sited to face the highway for on street collections. It is noted that colleagues within the Council's Waste Management team are supportive of the proposed storage and collection arrangements.

Delivery and servicing arrangements

The applicant is including /proposing that the existing but redundant 'Police' bay in Church Lane is converted to an on street loading bay that will be able to service the delivery and servicing demands for this development. This bay is 11.5m in length and its conversion would be acceptable as there would be no resultant loss of CPZ bays at this location and it would easily meet the demands of this site whilst also providing another loading facility for shops and business and other residential properties in the locality of the site.

Draft Travel Plan

A draft residential travel plan accompanies the application, this appears sound with respect to the scope and content of it, the objectives and mode share targets which seek to reduce car trips and increase walking, cycling and public transport mode share. It is noted that the 5 year target for cycle trips is 12% which is supported.

It is also noted that proposals to provide a £200 voucher for each residential unit for the purchase of active travel related equipment and the like, plus provision of two Zones 1 to 6 travelcards for each unit for a year is included and these initiatives are welcomed as they will contribute towards active and sustainable transport mode change.

The implementation of the residential travel plan can be included within the S106 and a monitoring fee of £3000/year for the 5 year life of the travel plan will also be required to cover officer time in supporting the travel plan and reviewing the occupiers' surveys, updates and other issues during the life of the travel plan.

Construction Phase

The TA includes a very brief commentary on the build out of the development, and a full Construction Logistics Plan or similar will be required prior to commencement of the works. This must be covered by a pre commencement condition.

The TA includes reference to details needing to be included such as slot booking for vehicle arrivals and departures, avoidance of vehicles arriving during the AM/PM peaks and school start and finish periods, the suspension of on street parking bays once the existing access can no longer be used for construction access, and materials loading/unloading /handling.

In order to manage the build out from the Highways/transportation perspective, the applicant will need to make a contribution of £10,000 to cover Officer time to attend to and oversee/manage all Highways related aspects of the build out, which will include matters such as suspensions of parking bays, licences for temporary arrangements, oversight of temporary arrangements for pedestrians, cyclists and vehicle traffic management, and co-ordination with operational aspects of the highway network such as utilities works, highway maintenance and other development sites in the locality.

Summary

This application is for the redevelopment of Hornsey Police Station to provide 29 new residential units. It is proposed as a car free development.

There are a number of transportation considerations. Whilst the development will not in itself create any adverse impacts with respect to trip generation and highway/public transport capacities, there will be an increase in local parking stresses resultant from the development, primarily from the family sized units. Local parking stresses are high; however, it is acknowledged that even with an uplift in local demands there will be residual spaces remaining. Nonetheless, it is essential that the development delivers measures to reduce the additional parking demands and encourage the uptake of active and sustainable travel modes.

To do this the development will be formally designated as permit/car free under policy DM32, there will be a travel plan, and a car club facility provided for 5 years from occupation. High quality cycle parking will be required, and a pre

commencement condition for submission of detailed drawings for the proposed arrangements will be imposed.

It will also be appropriate for the development to make a financial contribution towards improving accessibility of the site by active and sustainable means, and a contribution of £100,000 is considered appropriate for the upgrade of the unsignalized crossing facility on Tottenham Lane/ Church Lane gyratory to provide enhanced pedestrian access to and from the site and the introduction of an east-west cycle route at this location.

Finally, given the site's location adjacent to the highway, other residential properties and local shops and businesses, a Construction Logistics Plan will be required for approval prior to commencement of the construction works, to ensure the build out is appropriately managed and potential impacts on the public highway and neighbours are minimised and mitigated.

To summarise, this application does have the potential to create an increase in local parking stresses, however the potential highway safety implications that may arise from the development proposal are not considered significant to recommend refusal. As commented, several obligations and mitigation measures will be necessary to make this development acceptable in transportation terms, the Transportation and highways authority has considered fulfilment and provision of these will ensure that the potential impacts are not severe and will make the application acceptable.

The following section 106 obligations and conditions will need to be secured as part of the proposed development to ensure that the development proposal complies with the policy requirements of the London Plan, Haringey Local Plan and Haringey Development Management DPD. Subject to the following section 106 obligations and conditions, we have no objection to this development proposal:

1. Car-Free Agreement

The owner is required to enter into a Section 106 Agreement to ensure that the residential units are defined as “car free” and therefore no residents therein will be entitled to apply for a residents parking permit under the terms of the relevant Traffic Management Order (TMO) controlling on-street parking in the vicinity of the development. The applicant must contribute a sum of £4000 (four thousand pounds) towards the amendment of the Traffic Management Order for this purpose.

Reason: To ensure that the development proposal is car-free and any residual car parking demand generated by the development will not impact on existing residential amenity.

2. Car Club Membership

The applicant will be required to enter into a Section 106 Agreement to establish a car club scheme, which includes the provision of five years’ free membership for all residents and £100 (one hundred pounds in credit) per year/per unit for the first 2 years.

Reason: To enable residential occupiers to consider sustainable transport options, as part of the measures to limit any net increase in travel movements.

3. Construction Logistics and Management Plan

The applicant / developer is required to submit a Construction Logistics and Management Plan, 6 months (six months) prior to the commencement of development, and approved in writing by the local planning authority. The applicant will be required to contribute, by way of a Section 106 agreement, a sum of £10,000 (ten thousand pounds) to cover officer time required to administer and oversee the temporary arrangements, and ensure highways impacts are managed to minimise nuisance for other highways users, local residents and businesses. The plan shall include the following matters, but not limited to, and the development shall be undertaken in accordance with the details as approved:

- a) Routing of excavation and construction vehicles, including a response to existing or known projected major building works at other sites in the vicinity and local works on the highway;
- b) The estimated number and type of vehicles per day/week;
- c) Estimates for the number and type of parking suspensions that will be required; and
- d) Details of measures to protect pedestrians and other highway users from construction activities on the highway.

Reason: To provide the framework for understanding and managing construction vehicle activity into and out of a proposed development in combination with other sites in the Wood Green area and to encourage modal shift and reducing overall vehicle numbers. To give the Council an overview of the expected logistics activity during the construction programme. To protect of the amenity of neighbour properties and to main traffic safety.

4. Residential Travel Plan

Within six (6) months of first occupation of the proposed new residential development a Travel Plan for the approved residential uses shall have been submitted to and approved by the Local Planning Authority detailing means of conveying information for new occupiers and techniques for advising residents of sustainable travel options. The Travel Plan shall then be implemented in accordance with a timetable of implementation, monitoring and review to be agreed in writing by the Local Planning Authority, we will require the following measures to be included as part of the travel plan in order to maximise the use of public transport:

- a) The developer must appoint a travel plan co-ordinator, working in collaboration with the Estate Management Team, to monitor the travel plan initiatives annually for a minimum period of 5 years.
- b) Provision of welcome induction packs containing public transport and cycling/walking information to every new resident, along with a £200 voucher for active travel related equipment purchases, and two Zones 1 to 6 Travel cards for each unit for two years.

c) The applicants are required to pay a sum of, £3,000 (three thousand pounds) for five years £15,000 (fifteen thousand pounds) in total for the monitoring of the travel plan initiatives.

Reason: To enable residential occupiers to consider sustainable transport options, as part of the measures to limit any net increase in travel movements.

5. Section 278 (Highway Works) Agreement

Prior to the first occupation of the development, the developer shall enter into an agreement with the Council as the Local Highway Authority under Section 278 of the Highways Act 1980 to undertake highway works comprising, reinstatement of the redundant crossover on Harold Road, resurfacing of the footway to the perimeter of the site to ensure a high quality footway, and changes to the on street waiting and loading restrictions as proposed.

The applicant will be required to provide details designs for all associated works including a Stage 1 and Stage 2 Road Safety Audits being carried.

Reason: To ensure the highway works are undertaken to high-level standards and in accordance with the Council's requirements. To enable the amendment of the Traffic Management Order enabling the reinstatement of on-street parking outside the site, as well as lining and signing works.

6. Sustainable and active travel contribution

The applicant is to make a £100,000 (one hundred thousand pounds), with a component of the contribution going towards upgrading of the informal pedestrian crossing on Church Lane to a zebra crossing (£70,000) and the remainder (£30,000) to go towards development of the design and implementation of East - West cycle walking and cycling connections, as supported within the Haringey Walking and Cycling action Plan.

Reason – to improve the accessibility of the site by active and sustainable means, improve the pedestrian crossing facilities in the locality of the site, and by doing both contribute towards mode change and travel plan targets in the Travel Plan.

7. Cycle Parking

The applicant will be required to provide long and short-stay cycle parking provision, for both residential and non-residential elements of the development, in line with the London Plan (2021), cycle parking is to be design and implemented in line with the London Cycle Design Standards and full layout and dimensioned details will be required for review. These details are required prior to commencement of the development.

Reason: To promote travel by sustainable modes of transport and to comply with the London Plan (2021) standards and the London Cycle Design Standards.

8. Scooter parking

The applicant will be required to provide secure, weatherproof mobility scooter charging and parking/storage provision, for the occupiers of the accessible units within the development. Full layout and dimensional details will be required prior to commencement of the development.

Reason: To promote travel by sustainable modes of transport and to comply with the London Plan (2021) standards and the London Cycle Design Standards.

9. Delivery and Servicing Plan

The applicant shall be required to submit a Delivery and Servicing Plan (DSP) for the local authority's approval. The DSP must be in place prior to occupation of the development. The delivery and servicing plan must also include a waste management plan which includes details of how refuse is to be collected from the site.

Reason: To ensure that the development does not prejudice the free flow of traffic or public safety along the neighbouring highway.

<p>Carbon team</p>	<p>Carbon Management Response 20/03/2023</p> <p>In preparing this consultation response, we have reviewed:</p> <ul style="list-style-type: none"> • Energy and Sustainability Statement prepared by Build Energy Ltd (dated 13/04/2022) • Overheating Risk Assessment prepared by Build Energy Ltd (dated 14/04/2022) • Embodied Carbon Statement Chapter by Create Consulting Engineers Ltd (dated June 2022) • Circular Economy Statement prepared by Create Consulting Engineers Ltd (dated June 2022) • Urban Greening Statement prepared by Archanaeum (dated 22/07/2021) • Relevant supporting documents. <p>1. Summary</p> <p>The development achieves a reduction of 40.25% carbon dioxide emissions on site. It has been proven that higher on-site carbon reductions of around 75-80% can be achieved in this kind of development for the new build development as demonstrated in this report. The applicant should further improve the on-site carbon reductions in line with London Plan Policy SI2, for both the new build and refurbished elements of the development.</p> <p>Further information should also be provided on the refurbishment, Sustainability Strategy and Overheating Assessment which need to be resolved before this application can be fully supported. Appropriate planning conditions will be recommended once this information has been provided.</p> <p>2. Energy – Overall</p> <p>Policy SP4 of the Local Plan Strategic Policies, requires all new development to be zero carbon (i.e. a 100% improvement beyond Part L (2013)) for applications</p>	<p>Observations have been taken into account. Conditions and clauses in 106 recommended</p>

submitted before 1st January 2023. The London Plan (2021) further confirms this in Policy SI2.

The overall predicted reduction in CO₂ emissions for the development shows a site-wide improvement of approximately 40.25% 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 20.30 tonnes of CO₂ from a baseline of 50.71 tCO₂/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: 27.36 tCO₂.

<i>Site-wide (SAP10 emission factors)</i>			
	Total regulated emissions (Tonnes CO₂ / year)	CO₂ savings (Tonnes CO₂ / year)	Percentage savings (%)
Part L 2013 baseline	50.71		
Be Lean	45	5.70	11.26%
Be Clean	36.90	8.20	15.97%
Be Green	30.30	6.40	13.02%
Cumulative savings		20.30	40.25%
Carbon shortfall to offset (tCO₂)	30.30		
Carbon offset contribution	£95 x 30 years x 30.30 tCO ₂ /year = £ 86,355		
10% management fee	£8,635.5		
Total	£94,990.5		

<i>Residential New Build (flats and houses) in Blocks B and C (SAP10)</i>			
	Total regulated emissions (Tonnes CO₂ / year)	CO₂ savings (Tonnes CO₂ / year)	Percentage savings (%)
Part L 2013 baseline	23.31		
Be Lean	20.85	2.45	10.52%
Be Clean	16.46	4.39	18.85%
Be Green	12.51	3.95	16.94%
Cumulative savings		10.79	46.31%
Carbon shortfall to offset (tCO₂)	12.51		

<i>Residential Refurbished Building (flats and houses) in Block A (SAP10 emission factors)</i>			
	Total regulated emissions (Tonnes CO₂ / year)	CO₂ savings (Tonnes CO₂ / year)	Percentage savings (%)
Part L 2013 baseline	27.40		
Be Lean	24.10	3.20	12%
Be Clean	20.40	3.80	14%
Be Green	17.80	2.50	9%
Cumulative savings		9.50	35%
Carbon shortfall to offset (tCO₂)	17.80		

Actions:

- The carbon reduction tables in the submitted report are not entirely correct; the figures have not been adjusted above. The reported carbon emissions, savings and percentages do not correspond entirely. E.g. the site-wide shortfall is reported as 30.30, but when adding the new build and refurb shortfalls, this comes to 30.31. If using two decimal points, the figures all need to add up. The percentages also need to be correct, and not be cumulative (e.g. for the site-wide table). Please resubmit and also submit the GLA's Carbon Emission Reporting Spreadsheet.
- Please submit full SAP sheets for a representative selection of dwellings for the Baseline, Be Lean and Be Green scenarios. The SAP Compliance Full Specification is not sufficient for this.
- In new build developments of these typologies, we expect to see higher carbon reductions of above 70%, as detailed in the Towards Net Zero Carbon Report 2020.

Energy – Lean

The applicant has proposed a saving of 5.7 tCO₂ in carbon emissions (11.26%) through improved energy efficiency standards in key elements of the build, based on SAP10 carbon factors. This goes beyond the minimum 10% reduction set in London Plan Policy SI2, so this is supported.

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

	New build	Refurbishment
Floor u-value	0.10 W/m ² K	0.25 W/m ² K
External wall u-value	0.14 W/m ² K	0.30 W/m ² K
Roof u-value	0.10 W/m ² K	0.18 W/m ² K
Door u-value	1.00 W/m ² K	1.00 W/m ² K
Window u-value	1.40 W/m ² K	1.40 W/m ² K
G-value	0.63	0.63
Air permeability rate	3 m ³ /hm ² @ 50Pa MVHR or	Not stated

	OR 5 m ³ /hm ² @ 50Pa with Natural Ventilation (applicant to clarify)		
Ventilation strategy	Block B Flats - Mechanical ventilation with heat recovery (MVHR % efficiency; 0. W/l/s Specific Fan Power) and Block B houses and Block C Flats - Natural ventilation with extract fans	Natural ventilation with extract fans	
Thermal bridging	Accredited Construction Details	N/A	
Low energy lighting	100%	100%	
Heating system (efficiency / emitter)	89.5% efficient gas boilers (Be Lean only)	Radiators	
Space heating requirement	41.44 kWh/m ² /year	85.66 kWh/m ² /year	
Improvement from the target fabric energy efficiency (TFEE)	15.40% improvement, from 46.30 to 39.17 kWh/m ² /year	Not stated	
<p>Refurbishment: the external and party walls will be insulated with mineral wools/slabs insulation and a new slate roof is proposed with upgraded mineral insulation. The existing windows of the police station will be replaced with double glazed timber frame windows.</p> <p><u>Actions:</u> New build</p> <ul style="list-style-type: none"> - Please clarify why two air tightness figures have been quoted and amend with the correct one for the relevant block. Please also clarify where natural ventilation and/or MVHR will be proposed. - An air tightness of 5 m³/hm² @ 50Pa is not sufficiently ambitious, lower air tightness can easily be achieved with MVHR. 			

- 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.
- How is lighting energy demand improved? Should consider daylight control and occupancy sensors for communal areas.
- What is the proportion of glazed area? Consider following the LETI Climate Emergency Design Guide principles in façade design.
- Please set out the proposed Psi (Ψ) value.
- What is the construction of the building and what is the assumed thermal mass?
- Provide the average space heating requirement in kWh/m²/year. New dwellings should aim to meet the 15-20 kWh/m²/year target.

Refurbishments:

- Provide an estimate of the existing performance in un-refurbished condition. Outline the source of this data or assumptions, such as a building condition survey, an Energy Performance Certificate (EPC). Please also state clearly what figures have been used for the modelling, i.e. current conditions with evidence or the Building Regulations Part L notional figures?
- Detail what measures will be undertaken to make the retained building more energy efficient (what type of insulation, how the building will be made more airtight, etc)? Although this detail is included in the Circular Economy Statement, this should be cross-referenced in the Energy Strategy. The improvement of individual fabric elements is supported.
- Confirmation of the space heating demand of the retained building.
- More emphasis needs to be placed on reducing the energy demand from control systems like lighting, ventilation, equipment and appliances. It is not clear whether lighting will be replaced, advanced lighting/space conditioning controls, smart metering is proposed for the retained building.
- The air permeability should be measured; the application should provide air tightness testing results and a strategy to improve air tightness. This

will be conditioned. However, for current modelling, the notional air tightness figures of Part L should be used. This information was already requested at pre-application stage.

- What is the strategy to reduce thermal bridging, reducing thermal bridging is especially important in refurbished buildings where improvements are being made to the fabric.
- Why is MVHR not proposed for the refurbished dwellings? These are located along the road and are likely to have worse air quality; MVHR units can also filter out some air pollution with good levels of air tightness.

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

The applicant has modelled their communal ASHP strategy under Be Clean, however, this has been reported under Be Green below, in line with the GLA Energy Assessment Guidance.

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 solar photovoltaic (PV) panels are the most viable options to deliver the Be Green requirement. A total of 6.4 tCO₂ (13.02%) reduction of emissions are proposed under Be Green measures.

The solar array peak output would be 44.0 kWp, which is estimated to produce renewable electricity equivalent to a reduction of 6.4 tCO₂/year. The array of panels would be mounted on a total roof area of 170 m², at a 30° angle, facing south-west.

The development's heating strategy is not clearly set out in the report, and it is not well justified. The development is proposing the use of communal ASHP with minimum of 250% efficiency for Block B flats only. It states The Electric combi boiler will provide hot water and heating to Block B houses and Block C Flats with radiators. No heating system has been specified for the Block A retained building.

Actions:

- Why are different heating strategies proposed for the new build flats, new build houses and refurbished flats? What options were assessed during the design stage, and for what reasons were they discounted? A communal ASHP for the whole site should be considered, and was proposed at pre-application stage. Alternatively, the new build houses should have ASHP as these have higher efficiency rates and electric heating solutions should not be delivered where Passivhaus levels of fabric efficiency (with 15 kWh/m²/year maximum space heating demand).

- 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?
- How will the solar energy be used on site (before surplus is exported onto the grid)?
- A living roof should be installed under the solar PV, or if this is not feasible, the roof should be light coloured to reduce solar heat gains and the improve efficiency of the solar panels.
- How much of the heating/hot water demand will be met by the proposed types of heat pumps? If this cannot be met fully, how will this be supplemented?
- What is the Seasonal Coefficient of Performance (SCOP), the Seasonal Performance Factor (SFP) and Seasonal Energy Efficiency ratio (SEER) of the ASHP?
- Provide the make and model of the Electric combi boiler and its efficiency.

Energy – Be Seen

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

The development proposes the use of smart meters.

- Demonstrate that the planning stage energy performance data has been submitted to the GLA webform for this development:
(<https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance/be-seen-energy-monitoring-guidance/be-seen-planning-stage-webform>)

3. Carbon Offset Contribution

A carbon shortfall of 30.30 tCO₂/year remains. The remaining carbon emissions will need to be offset at £95/tCO₂ over 30 years. This includes the shortfall in reduction in emissions from the refurbished elements as these also need to comply with Policy SI2 to deliver a zero-carbon development.

4. Overheating

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

In accordance with the Energy Assessment Guidance, the applicant has undertaken a dynamic thermal modelling assessment in line with CIBSE TM59 with TM49 London Heathrow weather files, and the cooling hierarchy has been followed in the design. The report has modelled 34 habitable rooms, 25 dwellings and 0 corridors under the London Heathrow files.

All three blocks are modelled with openable windows, however due to the noise constraints of this site being adjacent to the roadway A103, and Harold Road, the TM59 criteria for predominantly mechanically ventilated dwellings should be applied (assuming windows need to remain closed) for all blocks.

Results are listed in the table below.

	TM59 – criterion A (<3% hours of overheating)	TM59 – criterion B hours >26°C (pass <33 hours)	Number of habitable rooms pass TM59	Number of corridors pass
--	---	--	--	---

DSY1 2020s	103/103	72/72	103	0/0
DSY2 2020s	Not Modelled	Not Modelled		
DSY3 2020s	Not Modelled	Not Modelled		
DSY1 2050s	Not Modelled	Not Modelled		
DSY1 2080s	Not Modelled	Not Modelled		

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

- Block A (retained): Natural ventilation;
Block B with MVHR Living Rooms – 30l/s & Bedrooms – 25l/s;
Block C with MVHR Living Rooms – 30l/s and Bedrooms – 20l/s, with openable areas of 0.8 and opening angle of 54.8%;
- Glazing – u-value of 1.4 W/m²K, g-value of 0.3 and 60%LT (Light Transmission);
- No active cooling.

No future mitigation measures have been proposed.

Overheating Actions:

- Redo the overheating modelling with the Central London weather file, which will more accurately represent the urban heat island effect.
- The worst-case corridor should be modelled in Block B (and others as applicable) where the communal heating system has been proposed. Details of the pipework heat gain assumptions must also be provided, for both the corridors and the gains within flats.

	<ul style="list-style-type: none">- The applicant has not modelled DSY 2 or 3 for the development. Please also model these and ensure the design has incorporated as many mitigation measures to pass DSY 2 and 3 as feasible. Any remaining overheating should inform the future retrofit plan.- The ventilation strategy needs to align with the likelihood that residents might be or feel constrained to open their windows for natural ventilation. This includes risk of crime at night, or sources of air or noise pollution. With these constraints, habitable rooms should be modelled as closed, unless suitable mitigation measures are proposed to allow for natural ventilation.<ul style="list-style-type: none">o Confirm that the habitable rooms facing the main road are not subject to adverse noise or air pollution. Rooms closest to any significant noise and / or air pollution source have to be modelled with windows closed at all times unless the pollution risk is mitigated (with cross reference to the Noise and the Air Quality Assessments to demonstrate the most sensitive receptors and the AVO Residential Design Guide).o What secure by design measures have been included in the design to prevent the risk of crime to ground floor and accessible habitable rooms that rely on natural ventilation? Will these windows be openable at night?- Please specify and model the future mitigation measures and demonstrate how this will improve the overheating results.- Identify communal spaces (indoor and outdoor) where residents can cool down if their flats are overheating.- Confirm who will own the overheating risk when the building is occupied (not the residents).- Please include images indicating which sample dwellings were modelled and floorplans showing the modelled internal layout of dwellings.- The applicant must demonstrate that the risk of overheating has been reduced as far as practical and that all passive measures have been explored, including reduced glazing and increased external shading. The	
--	---	--

applicant should also outline a strategy for residents to cope in extreme weather events, e.g. use of fans.

- 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 which includes materials and waste. Further information on measures to improve the sustainability including transport, health and wellbeing, materials and waste, water consumption, flood risk and drainage, biodiversity, climate resilience, energy and CO2 emissions and landscape design, is needed.

Action:

- What electric vehicle charging points are proposed? This allows the futureproofing of the dwelling/development by ensuring the required power has been installed.
- A target (%) for responsible sourced, low-impact materials used during construction.
- Set out how any demolition materials can be reused.
- Set out how surface water runoff will be reduced, that it will be separated from wastewater and not discharged into the sewer.
- Climate change mitigation should also be considered for the external spaces (shading, etc) and the impact of the increase in severity and frequency of weather events on the building structures.

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 0.43, which complies with the interim minimum target of 0.4 for predominantly residential developments in London Plan Policy G5.

The Biodiversity Net Gain calculation has not been reported.

Action:

- Submit Biodiversity New Gain Calculation.

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.

This application is not required to submit a full WLC statement. The following information is proposed to reduce the whole-life carbon emissions:

- An embodied carbon assessment of the infill wall composed of lightweight steel framing system and brickwork is calculated to have a self-weight of 240kg/m² and an embodied carbon measure of 86kgCO₂/m².
- Brick and blockwork infill wall has a calculated self-weight of 291kg/m² and an embodied carbon measure of 91kgCO₂ /m². The lightweight steel infill system has a high-strength to weight ratio, contributing to a reduction in weight of the supporting systems by 17.5% relative to blockwork construction.

- Substituting cement with less carbon-intensive cement replacement products, such as fly ash or PFA.
- The use of recycled bricks and locally sourcing them which can save carbon emission.

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:

- Designing for longevity, circa 50 years of building life, and disassembly at end of life
- Designing for flexibility and adaptability of open spaces and commercial spaces
- Retaining and refurbishing Grade II listed buildings
- Demolishing and recycling industrial/retail units
- Minimise operational waste and provide adequate space for recycling

The report sets out the Key Commitments (Section-4), Bill of materials (Section 4.1) and Recycling and waste reporting comment (Section 4.2). This is a fairly high level of information, and the applicant expects this to become more detailed as the detailed design progresses following permission.

6. Planning Obligations Heads of Terms

- Energy Plan and Sustainability Review
- Be Seen commitment to uploading energy data
- Estimated carbon offset contribution (and associated obligations) of £94,990.5 (including the 10% management fee; calculation based on £2,850 per tonne of carbon emissions)

7. Planning Conditions

To be secured, however amendments are expected to be submitted and outstanding items resolved before the conditions can be drafted.

Carbon Management Response 04/07/2023

In preparing this consultation response, we have reviewed:

- Energy and Sustainability Statement prepared by Create Consulting Engineers Ltd (dated April 2023)
- SS_CC_P22-2562 Carbon Management Response HGY_2022_2116-1.0- Applicant's response
- Overheating Risk Assessment prepared by Create Consulting Engineers Ltd (dated June 2023)
- Biodiversity Net Gain Assessment prepared by Arbtech (dated 24 June 2023)

1. Summary

The development now achieves a reduction of 81% carbon dioxide emissions on site calculated with Part L 2021, updated from 40% emissions from a Part L 2013 baseline with improved fabric efficiencies in the existing building.

Although this increase in on-site savings is supported in principle, we question the deliverability of this through the lack of evidence in other supporting documents as part of the planning application that the energy strategy can be delivered. The proposed building specifications are not aligned between the energy strategy, overheating strategy, and architectural plans, sections, and elevations. **We therefore object to this application.**

The Overheating Assessment has been updated with the right London Weather Centre file; the update to assessing the heat risk more realistically and

appropriately assessing the noise and air quality constraints in relation to the overheating risk is welcomed.

Some clarifications must be provided with regard to the Energy Strategy and Overheating Strategy detailed below.

Appropriate planning conditions will be recommended once this information has been provided.

2. Energy – Overall

With updated specifications, the development has been remodelled under Part L 2021 to a site-wide carbon reduction of 81%. This represents a saving of around 49.9 tCO₂/year from a baseline of 62 tCO₂/year.

The calculated unregulated emissions are 0.3 tCO₂/m²/year, updated from the 27 tCO₂/year previously calculated under the Part L 2013 baseline. The new figure is very low.

<i>Site-wide</i>			
	Total regulated emissions (Tonnes CO₂ / year)	CO₂ savings (Tonnes CO₂ / year)	Percentage savings (%)
Part L 2021 baseline	62.0		
Be Lean	43.0	19.1	31%
Be Clean	38.7	4.3	7%
Be Green	12.1	26.6	46%
Cumulative savings		59.9	81%
Carbon shortfall to offset (tCO₂)	12.1		

Carbon offset contribution	£95 x 30 years x 12.10 tCO ₂ /year = £ 34,485
10% management fee	£3,448.5
Total	£37,933.5

Actions:

- The unregulated emissions need to be reported in tonnes per year site-wide (including refurbishment and new build).
- Submit carbon reduction summary tables for both new build and refurbishment.
- With the amount of SAP sheets issued, it is very difficult to sift through the relevant sheets. Please add sub-chapters (cross referenced in the table of contents), separating out refurb and new build elements and only including the Baseline, Be Lean and Be Green sheets for a representative sample of dwellings.

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/m²/year)	Space Heating Demand (kWh/m²/year)	Methodology used
New Building	66.72 kWh/m ² /year	19.69 kWh/m ² /year	SAP Calculations
Refurbishment	49.70 kWh/m ² /year	16.96 kWh/m ² /year	SAP Calculations

Actions:

- The EUI and Space Heating Demand figures for the refurbishment are lower than the new build, which seems unlikely for a number of reasons, including that the values do not align below and are not aligned with the level of improvement to the Target Fabric Energy Efficiency.

Energy – Lean

The applicant has proposed a saving of 19.1 tCO₂ in carbon emissions (31%) through improved energy efficiency standards in key elements of the build, based on SAP10 carbon factors.

The applicant has incorporated improved fabrics for both new built and refurbished parts of the development – only the updated specs have been included below:

	New build	Refurbishment
Floor u-value	Unchanged - 0.10 W/m ² K	0.10 W/m ² K
External wall u-value	Unchanged - 0.14 W/m ² K	0.14 W/m ² K
Roof u-value	Unchanged - 0.10 W/m ² K	0.10 W/m ² K
Door u-value	0.98 W/m ² K	0.98 W/m ² K
Window u-value	1.20 W/m ² K	1.20 W/m ² K
Air permeability rate	3 m ³ /hm ² @ 50Pa	3 m ³ /hm ² @ 50Pa
Ventilation strategy	All dwellings from Block B&C - Mechanical ventilation with heat recovery (MVHR 91% efficiency; 0.88 W/l/s Specific Fan Power)	All dwellings from Block A - Mechanical ventilation with heat recovery (MVHR 91% efficiency; 0.88 W/l/s Specific Fan Power)
Thermal bridging	LABC equivalent psi values where available	LABC equivalent psi values where available
Low energy lighting	100%	100%

Heating system (efficiency / emitter)	89.5% efficient gas boilers (Be Lean only); Communal ASHPs for flats with 300% efficiency and Individual ASHPs for houses with 129% efficiency (Be Green only)	89.5% efficient gas boilers (Be Lean only); Communal ASHPs for flats with 300% efficiency and Individual ASHPs for houses with 129% efficiency (Be Green only)	
Improvement from the target fabric energy efficiency (TFEE)	6% improvement from 43.74 to 40.93 kWh/m2/year	6% improvement, from 51.43 to 48.29 kWh/m2/year	
<p>The proposed U-values of the external walls are achieved with 100mm insulation sandwiched between the external and internal brick layers and 37.5 mm insulated plaster board. Similarly, the roof's u-value is achieved with a combination of roof tiles, timber battens, membrane, 120mm insulation between timber joints, and 37.5 mm insulated plasterboard. The drawing provided in Appendix I demonstrates the implementation of this insulation. Specifically, for the walls, a total of 137.5mm insulation is utilized, while the roof incorporates 157.5mm of insulation.</p> <p><u>Actions:</u></p> <ul style="list-style-type: none"> - The g-value in the Energy Strategy is 0.68, but it is 0.25 in the Overheating Strategy. The two need to be aligned to ensure the modelling is correct for both strategies. The u-value can be higher for north-facing windows to retain more heat, and lower on all other elevations to reduce solar gains. In addition, the g-value between the existing and new build has not been differentiated. - The retained building is proposed to be retrofitted to achieve u-values of 0.14 (walls), 0.10 (floors, roof) and 1.20 windows. Information varies within the energy statement on how these u-values will be achieved, citing different insulation thicknesses. <ul style="list-style-type: none"> o Walls - the energy strategy says, a cavity will be created to insulate the existing walls from the outside it looks like it is a solid 			

wall and not a cavity wall. On the proposed plans, it does not appear that insulation is added. This is an issue as it is related to high carbon savings under Be Lean of the refurbished building. If the internal insulation was not accounted for, is likely that the internal floor area will be reduced. We are not sure if they will not meet the minimum space standards as a result.

- The windows appear to be single glazed (from google streetview), and the plans say they will be retained. Then how will a u-value of 1.20 be achieved?
- Please provide the updated building floor plans that includes the proposed insulation.
- Please provide commentary how the building airtightness will be improved in the existing building.

Energy – Green

The application has reviewed the installation of various renewable technologies. The report concludes that solar photovoltaic (PV) panels and ASHP are the most viable options to deliver the Be Green requirement. A total of 28.6 tCO₂ (46%) reduction of emissions are proposed under Be Green measures.

Communal ASHP (300%, COP of 3) is used for all flats including new built and refurb while individual ASHPs (129%, SCOP of 3.24) is used for all flats from new built and refurb. Electric combi has been modelled with minimum distribution loss space and efficiency of 300%.

The solar array peak output is proposed to be 26kWp, 6.5kWp for the refurbished unit and 19.5kWp for the new built unit. The total output of 26kWp is almost half than the total of 44kWp proposed initially. It is unclear why this has been reduced and how the available roof space has been maximised for solar PV installation.

Actions:

- Please provide a commentary on why a lower output solar PV is proposed, when during the meeting it was stated that solar PV was being maximised. This reduction is not supported, and it is unclear why less is being proposed. The policy is to be zero carbon by maximising carbon reduction on site. It is recommended to maximise the available roof space with solar PV installation, on other parts of the roof.
- The roof plan needs to be amended to include annotations of the solar PV panels and proposed living roof areas.

Energy – Be Seen

The development proposes the use of smart meters. Submission of data on Be Seen platform has not yet been confirmed, this remains outstanding.

3. Carbon Offset Contribution

A carbon shortfall of 12.1tCO₂/year remains. The remaining carbon emissions will need to be offset at £95/tCO₂ over 30 years. This includes the shortfall in reduction in emissions from the refurbished elements as these also need to comply with Policy SI2 to deliver a zero-carbon development.

4. Overheating

The applicant has resubmitted a dynamic thermal modelling assessment in line with CIBSE TM59 with TM49 London Weather Centre files. The report has modelled 68 bedrooms, 35 spaces and 4 corridors.

The report does not include floor plans showing the modelled internal layout of the dwellings.

The overheating assessment is performed with closed windows due to noise constraints as the baseline scenario.

- Baseline + Mitigation strategy 1 – Closed windows with mechanical ventilation
- Baseline + Mitigation strategy 2 – Closed windows mechanical ventilation with external blinds

- Baseline + Mitigation strategy 3 – Close windows with MVHR, external blinds and extract fans.

Results are listed in the table below:

	TM59 – criterion A (<3% hours of overheating)	TM59 – criterion B hours >26°C (pass <33 hours)	Number of habitable rooms pass TM52	Number of corridors pass
Baseline – Close windows and no mechanical ventilation				
DSY1 2020s	0/103	0/68	0/103	4/4
DSY2 2020s	0/103	0/68	0/103	0/4
DSY3 2020s	0/103	0/68	0/103	0/4
DSY1 2050s	Not modelled	Not Modelled	Not Modelled	Not Modelled
DSY1 2080s	0/103	0/68	0/103	0/4
Baseline + mitigation strategy 1				
DSY1 2020s	33/103	33/68	103/103	2/4
DSY2 2020s	0/103	0/68	103/103	0/4
DSY3 2020s	0/103	0/68	103/103	0/4
DSY1 2050s	Not modelled	Not Modelled	Not Modelled	Not Modelled
DSY1 2080s	0/103	0/68	65/103	0/4
Baseline + mitigation strategy 2				

DSY1 2020s	30/103	30/68	103/103	2/4
DSY2 2020s	0/103	0/68	103/103	0/4
DSY3 2020s	0/103	0/68	103/103	0/4
DSY1 2050s	Not modelled	Not Modelled	Not Modelled	Not Modelled
DSY1 2080s	0/103	0/68	65/103	0/4
Baseline + mitigation strategy 3				
DSY1 2020s	103/103	68/68	103/103	2/4
DSY2 2020s	103/103	68/68	103/103	0/4
DSY3 2020s	103/103	68/68	103/103	0/4
DSY1 2050s	Not modelled	Not Modelled	Not Modelled	Not Modelled
DSY1 2080s	35/103	0/68	60/103	0/4

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

- Closed windows
- MVHR with extract fans
- Glazing – u-value of 1.2 W/m²K, g-value of 0.25;

No future mitigation measures have been proposed.

The applicant confirms the building management team supervised by the freeholder/owner will own the overheating risk.

Overheating Actions:

- Please submit plans and sections showing the external shading including its specifications.
- Set out the heat losses from pipework and heat interface units for the communal heating system.
- Please include images and floorplans showing the modelled internal layout of dwellings.
- Set out a retrofit plan for future and more extreme weather files, demonstrating how these measures can be installed, how they would reduce the overheating risk, what their lifecycle replacement will be, and who will be responsible for overheating risk.
- This development should have a heatwave plan / building user guide to mitigate overheating risk for occupants.

5. Sustainability

The development is proposed as a car-free scheme. Recommendations have been made for responsible sourcing of materials and sustainable materials. Development of construction and demolition management plan is proposed along with pre-demolition audit.

Urban Greening / Biodiversity

The Biodiversity Net Gain Assessment shows the proposed plan results in a 100% net gain in habitat units which goes beyond the 10% target of biodiversity net gain.

Living roofs & Living walls

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

The applicants have noted that there will be living roofs and living walls (ref para 7.22 of energy statement and s3.2 of BNG Report) in the scheme, but no evidence has been submitted. Plan ref: 044_A-114 does not indicate annotation for living roofs, solar PV, and any plant equipment on the roof.

Actions:

- Please provide annotated plans including the living roofs, solar PV, and any plant equipment proposed on the roof.

Whole Life-Cycle Carbon Assessments

No further actions required.

Circular Economy

No further actions required.

6. Planning Obligations Heads of Terms

- Energy Plan and Sustainability Review
- Be Seen commitment to uploading energy data
- Estimated carbon offset contribution (and associated obligations) of £31,663.5 (including the 10% management fee; calculation based on £2,850 per tonne of carbon emissions)

7. Planning Conditions

To be secured, however amendments are expected to be submitted and outstanding items resolved before the conditions can be drafted.

Carbon Management Response 10/07/2023

In preparing this consultation response, we have reviewed:

- Energy and Sustainability Statement prepared by Create Consulting Engineers Ltd (dated 6th July 2023, Rev B) and appendices
- Overheating Risk Assessment prepared by Create Consulting Engineers Ltd (dated 7th July 2023) and appendices
- 044_A-214 Rev 05
- 044_A-215 Rev 04
- 044_A-216 Rev 06
- Link to the specification of external roller blinds

Summary

The applicant has remodelled the carbon emissions for the development, using the correct baseline in line with Building Regulations and using SAP10 carbon factors for unregulated emissions.

The applicant has now also included external blinds into their overheating mitigation strategy.

The development now achieves a site-wide reduction of 80% in on-site carbon dioxide emissions calculated with Part L 2021. This is achieved through a 81% reduction in the new build dwellings, with a 23% reduction under Be Lean, and a 80% reduction in the existing building with a 30% reduction under Be Lean.

Overall, this scheme will be retrofitting the existing building and build new residential dwellings around this, at a high standard. This ambition is supported. Suitable planning conditions have been recommended below to secure the benefits of this scheme.

Energy Strategy

Site-wide

	Total regulated emissions (Tonnes CO ₂ / year)	CO ₂ savings (Tonnes CO ₂ / year)	Percentage savings (%)
Part L 2021 baseline	52.6		
Be Lean	39	13.5	26%
Be Clean	31.4	4.9	9%
Be Green	10.3	23.8	46%
Cumulative savings		42.3	80%
Carbon shortfall to offset (tCO₂)	10.3		
Carbon offset contribution	£95 x 30 years x 10.3 tCO ₂ /year = £29,355		
10% management fee	£2,935		
Total	£32,290		

Overheating

Following discussions, the applicant has confirmed that external shading will form part of the overheating mitigation strategy. External shading will help reduce the overheating risk and ventilation demand. The shutters will be integrated into the windows. Updated elevations have been submitted.

Planning Obligations – Heads of Terms

To be secured:

- Energy Plan
- Sustainability Review
- Be Seen commitment to uploading energy data

- Estimated carbon offset contribution (and associated obligations) of £29,355 (calculation based on £2,850 per tonne of carbon emissions), plus a 10% management fee;

Planning Conditions

Energy Strategy

The development hereby approved shall be constructed in accordance with the Energy & Sustainability Strategy by Create Consulting Engineers (dated July 2023) delivering a minimum 80% improvement on carbon emissions over 2021 Building Regulations Part L, high fabric efficiencies, air source heat pumps (ASHPs) and a minimum 36.8 kWp 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:

- Confirmation of how this development will meet the zero-carbon policy requirement in line with the Energy Hierarchy following the GLA Energy Assessment Guidance;
- Confirmation of the necessary fabric efficiencies to achieve a minimum 26% reduction;
- Details to reduce thermal bridging;
- Location, specification and efficiency of the proposed ASHPs (Coefficient of Performance, Seasonal Coefficient of Performance, and the Seasonal Performance Factor), with plans showing the ASHP pipework and noise and visual mitigation measures;
- Specification and efficiency of the proposed Mechanical Ventilation and Heat Recovery (MVHR), with plans showing the rigid MVHR ducting and location of the unit;
- Details of the PV, demonstrating the roof area has been maximised, with the following details: a roof plan; the number, angle, orientation, type, and efficiency level of the PVs; how overheating of the panels will be minimised; their peak output (kWp); and how the energy will be used on-site before exporting to the grid;

- Specification of any additional equipment installed to reduce carbon emissions.

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) 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.

Retrofit

Prior to the commencement of any works to retrofit the existing building, an Energy Strategy shall be submitted to and approved in writing by the Local Planning Authority. This strategy shall:

- Set out how the development will aim for PAS 2035:2019 & 2030:2017 compliance, with all documentation lodged on the Trustmark data warehouse as appropriate

- Set out how it will reduce the development's carbon emissions prioritising improvements to the fabric, using SAP or Passive House Planning Package calculations;
- Set out the existing air tightness level (measured), and the air tightness strategy on how and where air tightness will be improved to a maximum of 3 m³/m²h @ 50Pa;
- Set out a detailed strategy to reduce thermal bridging, reducing risks of condensation and heat loss, with calculations of the proposed thermal bridge heat loss factors;
- Confirm details of what materials and thicknesses of insulation will be used and where, showing on detailed plans and sections; how the fenestration will be improved (preference for double or triple glazing in existing timber frames);
- Provide existing measured space heating demand (kWh/m²/year) and energy use (kWh/year) and set out the modelled space heating demand for the development (kWh/m²/year).

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.

Energy Monitoring

No development shall take place beyond the superstructure of the development until a detailed scheme for energy monitoring has been submitted to and approved in writing by the Local Planning Authority. The details shall include details of suitable automatic meter reading devices for the monitoring of energy use and renewable/ low carbon energy generation. The monitoring mechanisms approved in the monitoring strategy shall be made available for use prior to the first occupation of each building and the monitored data for each block shall be submitted to the Local Planning Authority, at daily intervals for a period of 5 years from final completion.

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

REASON: To ensure the development can comply with the Energy Hierarchy in line with London Plan 2021 Policy SI 2 and Local Plan Policy SP4 before construction works prohibit compliance.

Overheating

Prior to the above ground commencement of the development, an updated Overheating Report shall be submitted to and approved by the Local Planning Authority to confirm the overheating mitigation strategy in the Overheating Assessment prepared by Create Consulting Engineers (dated July 2023) that has been approved in principle.

This report shall include:

- Updated modelling of units modelled based on CIBSE TM59, using the CIBSE TM49 London Weather Centre files for the DSY1-3 (2020s) and DSY1 2050s and 2080s, high emissions, 50% percentile;
- Confirmation on which windows the external shutters will be installed;
- Demonstrating the mandatory pass for DSY1 2020s can be achieved following the Cooling Hierarchy with external shutters and in compliance with Building Regulations Part O, demonstrating that any risk of crime, noise and air quality issues are mitigated appropriately evidenced by the proposed location and specification of measures;
- 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 external blinds/shutters to all habitable rooms must be submitted for approval by the local planning authority. This should include the fixing mechanism, specification of the shutters, 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:

- External roller shutters;
- MVHR with extract fans;
- Glazing – u-value of 1.2 W/m²K, g-value of 0.25 (except north-facing façade with a g-value of 0.52);
- Hot water pipes insulated to high standards;
- Any further mitigation measures as approved by or superseded by the latest approved Overheating Strategy.

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

Building User Guide

Prior to occupation, a Building User Guide for new residential occupants shall be submitted in writing to and for approval by the Local Planning Authority. The Building User Guide will advise residents how to operate their property during a heatwave, setting out a cooling hierarchy in accordance with London Plan (2021) Policy SI4 with passive measures being considered ahead of cooling systems for

different heatwave scenarios. The Building User Guide should be easy to understand, and will be issued to any residential occupants before they move in, and should be kept online for residents to refer to easily.

Reason: In the interest of reducing the impacts of climate change and mitigation of overheating risk, in accordance with London Plan (2021) Policy S14, and Local Plan (2017) Policies SP4 and DM21.

Living Roofs and Walls

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

- i) A roof plan identifying where the living roofs will be located, and a ground floor plan identifying where the living walls will be rooted in the ground, if any;
- ii) A section demonstrating settled substrate levels of no less than 120mm for extensive living roofs (varying depths of 120-180mm), and no less than 250mm for intensive living roofs (including planters on amenity roof terraces);
- iii) Roof plans annotating details of the substrate: showing at least two substrate types across the roofs, annotating contours of the varying depths of substrate
- iv) Details of the proposed type of invertebrate habitat structures with a minimum of one feature per 30m² of living roof: substrate mounds and 0.5m high sandy piles in areas with the greatest structural support to provide a variation in habitat; semi-buried log piles / flat stones for invertebrates with a minimum footprint of 1m², rope coils, pebble mounds of water trays;

- v) Details on the range and seed spread of native species of (wild)flowers and herbs (minimum 10g/m²) and density of plug plants planted (minimum 20/m² with root ball of plugs 25cm³) 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 dwellings, 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.

Biodiversity Measures

(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,

	<p>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.</p> <p>(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.</p> <p>Development shall accord with the details as approved and retained for the lifetime of the development.</p> <p>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.</p> <p>Water Butts</p> <p>No dwellinghouse shall be occupied until details of the location of a water butt of at least 120L internal capacity to be installed to intercept rainwater draining from the roof of each dwelling has been submitted to and approved in writing by the Local Planning Authority and subsequently provided at each dwelling. The approved facilities shall be retained.</p> <p>Reason: To reduce the risk of flooding and demand for water, increase the level of sustainability of the development and in line with Haringey Local Plan Policy SP5, DM21, DM24 and DM25.</p>	
<p>Waste Management Team</p>	<p>Officers comments dated September 2022</p>	<p>Comments noted</p>

The information relating to refuse in section 5 of the Design Statement, Access and Servicing, is slightly confusing and will require clarification before this application can be signed off by the waste team.

It appears that the individual houses in this development will use the communal bin stores and the drawings show that the correct number of bins to accommodate the waste from these units alongside that of the flats. There is then reference to 'each house has refuse storage in line with council requirements' and individual receptacles are listed. If it can be confirmed that the 6 terraced houses in block A and the 4 mews houses in Block B will not have individual bins but will use the communal bin stores that would be helpful.

If this is confirmed, then bin requirements are set out below. Collections for all waste streams will be weekly.

- Block A flats (4) – 1 x 1100l refuse, 1 x 1100l mixed dry recycling, 1 x 140l wheeled bin for food waste
- Block A houses (6) and Block C flats (8) – 3 x 1100l refuse, 2 x 1100l mixed dry recycling, 1 x 140l wheeled bin for food waste
- Block B mews houses (4) and flats (7) – 2 x 1100l refuse, 2 x 1100l mixed dry recycling, 1 x 140l wheeled bin for food waste

Drag distances from the bin stores to the collection vehicle on the Harold Road side of the development appear will be within the 10m required distance. The bin store serving block B and the mews properties will be collected from Tottenham Lane. The drag distance here appears to be longer than the permitted 10m. Confirmation of the pull distance of the bins from this bin store will be needed, and if this is the case whether the proposed servicing strategy is for the collection vehicle to back up into the development to collect from here.

Applicants response dated 06 October 2022

	<p>The houses in Blocks A & B will share the communal bin stores. We have a loading bay allocated at the junction of the mews street and Tottenham Lane, the refuse vehicle will be able to pull in and bring the collection distance to 10m</p> <p>Officers comments dated 06 October 2022</p> <p>This is very helpful and clarifies the areas where more information was needed. As such, we can support this application from a waste management perspective.</p>	
Building Control	<p>I can confirm that I have no adverse comments to make with regards to the fire statement submitted for the above development.</p> <p>The scheme will however, be subject to a full check of the requirements of the Building Regulations 2010, when a formal application is submitted to Haringey Building Control.</p>	Comments noted
Flood & Water Management Lead	<p>Having reviewed the applicant's submitted following documents:</p> <ul style="list-style-type: none"> a) Flood Risk Assessment document reference number FRA - TT/VL/P22-2562/01 dated 21st July 2022 along with b) Thames Water Asset plans <p>We are content with the extent of detailed analysis included in the FRA and therefore we have no further comments to make on the proposed drainage design.</p>	Comments noted
Pollution		Comments noted Conditions included

Having considered only the submitted supportive information relevant to our aspect of work i.e. Energy and Sustainability Statement Report prepared by Build Energy Ltd dated 13th April 2022 taken note of the applicant proposed use of air source heat pump and solar PV panels as the source of energy for the development with no on-site parking facilities as submitted in the application, **please be advise that we have no objection to the proposed development in relation to AQ and Land Contamination but the following planning conditions and informative are recommend should planning permission be granted.**

However, where there is to be a change in the site energy source or provision is to be made for an on-site parking, an AQ Assessment and energy conditions will need to be recommend for the development and the application will need to come back to us for re-consideration at that stage. In the meantime, the following conditions are recommend.

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.
- 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. Prior to the commencement of the development, evidence of site registration at <http://nrmm.london/> to allow continuing details of Non-Road Mobile Machinery (NRMM) and plant of net power between 37kW and 560 kW to be uploaded during the demolition/construction phase of the development shall be submitted to and approved by the Local Planning Authority.

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

b. Evidence that all plant and machinery to be used during the demolition and construction phases of the development shall meets Stage IIIB of EU Directive 97/68/ EC for both NOx and PM emissions shall be submitted to the Local Planning Authority.

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

c. During the course of the demolitions, site preparation and construction phases, an inventory and emissions records for all Non-Road Mobile Machinery (NRMM) shall be kept on site. The inventory shall demonstrate that all NRMM is regularly serviced and detail proof of emission limits for all equipment. All documentation shall be made available for inspection by Local Authority officers at all times until the completion of the development.

Reasons: 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. Dust Monitoring and joint working arrangements during the demolition and construction work;
 - ii. Site access and car parking arrangements;
 - iii. Delivery booking systems;
 - iv. Agreed routes to/from the Plot;
 - v. Timing of deliveries to and removals from the Plot (to avoid peak times, as agreed with Highways Authority, 07.00 to 9.00 and 16.00 to 18.00, where possible); and
 - vi. Travel plans for staff/personnel involved in demolition/construction works to detail the measures to encourage sustainable travel to the Plot during the demolition/construction phase; and
 - vii. Joint arrangements with neighbouring developers for staff parking, Lorry Parking and consolidation of facilities such as concrete batching.
- d) The AQDMP will be in accordance with the Greater London Authority SPG Dust and Emissions Control (2014) and shall include:
- i. Mitigation measures to manage and minimise demolition/construction dust emissions during works;
 - ii. Details confirming the Plot has been registered at <http://nrmm.london>;
 - iii. Evidence of Non-Road Mobile Machinery (NRMM) and plant registration shall be available on site in the event of Local Authority Inspection;
 - iv. An inventory of NRMM currently on site (machinery should be regularly serviced, and service logs kept on site, which includes proof of emission limits for equipment for inspection);
 - v. A Dust Risk Assessment for the works; and
 - vi. Lorry Parking, in joint arrangement where appropriate.

Additionally, the site or Contractor Company must be registered with the Considerate Constructors Scheme. Proof of registration must be sent to the Local Planning Authority prior to any works being carried out.

Reason: To safeguard residential amenity, reduce congestion and mitigate obstruction to the flow of traffic, protect air quality and the amenity of the locality."

Informative:

1. Prior to the demolition or construction on the existing building and land, an asbestos survey should be carried out to identify the location and type of asbestos containing materials. Any asbestos containing materials must be removed and disposed of in accordance with the correct procedure prior to any demolition or construction works carried out.

I hope the above clarify our position on the application? Otherwise, feel free to contact us should you have any further query in respect of the application quoting M3 reference number WK/543814.

	The same comments were received on 6 July 2023 following re-consultation	
Housing	<p>The application sets out that the applicant wishes to develop the site of the existing Police Station. Block A the existing police building is to be retained and then a further two blocks added – Block B and Block C.</p> <p>Affordable housing provision</p> <p>The application seeks to deliver: 29 units in total: 10 houses and 19 flats. The units in Block A and Block B will be for private market sale and be a mixture of sizes. The units in Block C will be the affordable housing. The residential unit mix here will be 8 affordable housing units to 21 private for market sale units. The 8 units equate to 27.58% of all housing on the site. This is low.</p> <p>When assessing the proposal by habitable room as per <i>Appendix C – Affordable and Specialist/Supported Housing Guidance of Haringey’s Housing Strategy 2018</i>, no comprehensive breakdown by habitable room was provided, details have been requested. However, some figures were available in <i>Table 2: Residential Unit Mix in Planning Statement – REV 00: 22/07/2021</i> (pg. 15). These figures have been used for habitable room calculations. My assessment is that there will only be 20 habitable rooms (affordable housing) out of the 103 habitable rooms (entire development). Should these figures be correct, this would represent 19.4% by habitable room compared with 80.5% for the remaining units (private market sale). This would not be compliant</p>	<p>Comments noted</p> <p>The proposed affordable housing dwelling mix provides a higher proportion of one bed units. Whilst this does not meet the Council’s recommended dwelling mix for new affordable housing, Block C is constrained due to its layout and orientation and therefore 1 bed homes maximise the space within the block and in turn maximises the level of affordable units.</p>

with Haringey's Housing Strategy and Policies which states that the Council will seek 'to maximise the provision of affordable housing by requiring all development capable of providing 10 units or more residential units to provide affordable housing to meet an overall borough target of 40% by habitable rooms'.

On tenure split, the west of the borough does typically have lower provision of existing social rented homes, there is a need to deliver a higher percentage of the affordable homes in the rest of the borough outside the Tottenham AAP area as general needs housing – this is set out in detail in Appendix C of the Housing Strategy. The Council wishes to see as high a proportion as possible of the new affordable homes being delivered as homes for general needs. The tenure split of the affordable housing provided in this part of the borough should be 60% general needs low cost rented housing and 40% intermediate housing.

Dwelling mix

The recommended dwelling mix for the affordable housing is 10% x1beds, 45% x 2beds, 45% x3 beds (10% x4beds or more). The proposal outlined by the applicant provides the following number of units (accompanied by dwelling mix - percentage):

- 1bed 2persons x5 representing 62.5% of the proposed dwelling mix.
- 2beds 3persons x2 representing 25% of the proposed dwelling mix.
- 3beds 5persons x1 representing 12.5% of the proposed dwelling mix.

This does not meet Haringey's recommended dwelling mix for new affordable housing. The viability assessment provided is acknowledged.

Wheelchair adapted/adaptable units

As per the London Plan 3 units (10%) across the site will be wheelchair accessible and adaptable M4 (3) specification. The wheelchair accessible and adaptable units are however not across all tenures. X2 units in Block A and x1 unit in Block B will be to M4 (3) specification. Thus, none of the affordable housing units will be wheelchair adapted or adaptable for wheelchair users.

Rents

For low cost rented housing for general needs, the Council's preference is for Social Rent, however it recognises that the general needs homes delivered by most Registered Providers on schemes funded by the Mayor of London are likely to be at London Affordable Rent. We await further details on this. Social Rent or London Affordable Rent would be acceptable for the affordable housing units.

In addition, we would like to draw the applicants' attention to the following requirements relating to the pricing, allocation, letting, and marketing of the intermediate homes.

Pricing

The Council expects providers to ensure that all new affordable homes are genuinely affordable for Haringey residents.

The Council expects that Shared Ownership housing is priced so that net housing costs, including mortgage costs, rents, and service charges, should not exceed 40% of a household's net income.

As such, developers should be aware that Shared Ownership homes should be priced so that households with a maximum income of £40,000 for one- and two-bed properties, and £60,000 for larger properties will not spend more than 40% of their net income on mortgage costs, rents, and service charges.

To be clear, that 40% threshold relates to pricing and not to allocation and letting.

London Living Rent is required to be set at one third of average local household incomes.

Allocation and letting of London Living Rent and Shared Ownership homes

The Council's Intermediate Housing Policy requires that homes for Shared Ownership and London Living Rent (LLR) are targeted at households with a maximum income of £40,000 for one- and two-bed properties, and £60,000 for larger properties.

Applicants for Shared Ownership must be first-time buyers unless they are purchasing to move into a larger home to meet their household needs.

LLR homes must be limited to applicants with a gross household income of less than £60,000. However, they must be targeted at households with a maximum income of £40,000 for one- and two-bed properties.

The Council is clear that local residents should benefit from new affordable housing and requires the use of priorities and marketing bands set out in the attached policy and summarised below. Developers are asked to note that robust mechanisms will be put in place to monitor and enforce these.

Priorities are set to allocate properties when a number of individuals who meet the eligibility criteria have expressed an interest, and are as follows:

Priority One:

- Haringey social housing tenants, including Housing Association tenants where Haringey has nominations rights to that property
- Households on the housing register
- Households who are required to move because of estate renewal,
- Children of Haringey social housing tenants who are currently living with their parents

Priority Two

- Members of the armed forces
- Applicants who live or work in the borough

Priority Three

- Any other applicants living or working in another London borough.

Where several applicants are in the same priority band, precedence will be given to households on the lowest income who meet the affordability criteria, and then to the applicant who first expressed an interest in the property.

Marketing intermediate housing

The Council sets clear guidelines for the marketing of intermediate products in order to ensure that these priorities are achieved.

The attached Intermediate Housing Policy requires that intermediate housing is marketed in a phased way, with those living or working in Haringey with a maximum annual income of £40,000 for 1 and 2 bed properties and £60,000 for larger properties being prioritised until three months after completion.

	<p>Comments received dated 06/07/2023</p> <p>Thank you for asking for additional comments following the submission/completion of the viability assessment for the above site.</p> <p>As per the Housing Strategy and Policy team’s submission in September 2022, we would like to see the Affordable Housing offer closer to 40% by habitable room. We welcome though that the current affordable proposals are for London Affordable Rent (LAR) tenure.</p> <p>On the dwelling mix, it remains our view that the current mix is very 1-bed heavy and does not follow the recommended dwelling mix for new homes in the borough as set out in the Housing Strategy – our preferred mix is based on the size of homes needed by residents in the borough. As such if this could be reconfigured to provider fewer 1-beds and more of the much-needed family sized accommodation this would be welcomed; even if this resulted in slight reduction in units, it could still increase the Affordable Housing by Habitable Room and better balance the dwelling mix. We’d be happy to review this application again should further changes be made.</p> <p>Understandably viability would need to be considered here as well. The issue of viability is for planning to consider.</p> <p>In summary, as it stands the applicant proposes 8 (LAR) homes of 29 homes – x5 1B2P, x2 2B3P and x1 3B5P.</p>	
<p>Tree Officer</p>	<p>Officer comment dated 07 September 2022</p> <p>From an arboricultural point of view, I hold no objections to the proposal as there are no tree issues on site or trees to be incorporated into the development.</p>	<p>Comments noted</p>

	<p>We await the finalised master landscaping plans, specification and aftercare programme</p> <p>Officer comment dated 27 June 2023</p> <p>I am satisfied with the scope of comprehensive design, chosen trees and plant diversity</p>	
<p>Public Health</p>	<p>Response on storage:</p> <p>Thank you for clarifying the storage space meets London Housing Guidelines.</p> <p>Response on private amenity space:</p> <p>Although it is disappointing not to include private outdoor amenity space per unit, especially in light of the negative health impacts we have learnt through households not having a private outdoor space during the COVID-19 pandemic. We understand due to Heritage and Conservation restrictions that this cannot happen. This makes provision of a welcoming and inclusive communal space even more of a priority.</p> <p>Response to access and wheelchair accessible units:</p> <p>It is good to see the wheelchair units moved to Block A with level private access and a platform lift access for Block B. Will there be update plans shared?</p> <p>Response to play provision:</p> <p>We agree the shared amenity space is for everyone and accessibility is a key design element and Public Health would like to be assured the designs reflect this. It is great to hear you have highlighted the informal play space area and it would be useful to see a clearer design to ensure alignment with London Plan: Policy S4 Play and informal recreation and Haringey Council's Strategic Policy 13 Open Space and Biodiversity: "provide play spaces that are attractive, welcoming and engaging for all children and young people, children of both gender, disabled children and children from minority groups in the community".</p>	<p>Comments noted. The wheel chair accessible units are located in block B. A platform lift will be installed in block B</p> <p>Detailed design of the play equipment will be confirmed via condition</p> <p>The applicants have amended the ground floor plan of Block B to suit your comments on the cycle parking. The door to the rear of the 'connecting piece' has been removed to ensure that there are only 2 doors to access the cycle store. A</p>

We would like clarity on the image below (in reference to Landscape Strategy, page 5). It is stated that this is the natural stone slab layered to form the hexagonal stages. The surface and edges do not seem to look safe for children.



1. Horizontal stone image

Response on access to cycle storage:

Noted that a platform lift to Block B will be included and whole development will be built in accordance with Part M, we look forward to seeing this revised inclusion.

We appreciate from a potential maintenance perspective a bike can be seen as a nuisance coming through a main lobby but the London Cycling Design Standards by the GLA states, in [Chapter 8 Cycle Parking](#), that “accessing the parking area should involve passing through no more than two sets of doors” and at present it is three sets of doors. The concern here is around making cycling the more accessible and appealing option in this development and ensuring cycle storage is easy and safe to use, especially on a site with local parking constraints highlighted as an issue. This is line with Haringey Council’s [SP7 Transport](#) “promoting public transport, walking and cycling (including minimum cycle parking standards)” and is a Public Health preference to promote healthy, active lifestyles.

As mentioned, please do let us know if there is anything you would like to discuss further.

secondary door is proposed between the connecting piece and the Block B lobby to keep it weatherproofed and secure. From a design perspective, this amendment also enables the central garden area to be more visible from the street and creates a stronger sense of active frontage.

EXTERNAL

<p>Thames Water</p>	<p>Waste Comments The proposed development is located within 15 metres of a strategic sewer. Thames Water requests the following condition to be added to any planning permission. "No piling shall take place until a PILING METHOD STATEMENT (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement." Reason: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to significantly impact / cause failure of local underground sewerage utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. https://www.thameswater.co.uk/developers/larger-scale-developments/planning-yourdevelopment/working-near-our-pipes Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB</p> <p>There are public sewers crossing or close to your development. If you're planning significant work near our sewers, it's important that you minimize the risk of damage. We'll need to check that your development doesn't limit repair or maintenance activities, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. https://www.thameswater.co.uk/developers/larger-scale-developments/planning-yourdevelopment/working-near-our-pipes</p> <p>We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Groundwater discharges typically result from construction site dewatering, deep</p>	<p>Comments noted. Condition/Informativ e included</p>
----------------------------	---	--

excavations, basement infiltration, borehole installation, testing and site remediation. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. Should the Local Planning Authority be minded to approve the planning application, Thames Water would like the following informative attached to the planning permission: "A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 020 3577 9483 or by emailing trade.effluent@thameswater.co.uk . Application forms should be completed on line via www.thameswater.co.uk. Please refer to the Wholesale; Business customers; Groundwater discharges section.

With regard to SURFACE WATER drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water we would have no objection. Management of surface water from new developments should follow guidance under sections 167 & 168 in the National Planning Policy Framework. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. Should you require further information please refer to our website. <https://www.thameswater.co.uk/developers/larger-scale-developments/planning-yourdevelopment/working-near-our-pipes>

Water Comments 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-positionstatements>) and may wish to discuss the implication for their development with a suitably qualified environmental consultant

On the basis of information provided, Thames Water would advise that with regard to water network infrastructure capacity, we would not have any objection to the above planning application. Thames Water recommend the following informative be attached to this planning permission. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.

The proposed development is located within 5m of a strategic water main. Thames Water do NOT permit the building over or construction within 5m, of strategic water mains. Thames Water request that the following condition be added to any planning permission. No construction shall take place within 5m of the water main. Information detailing how the developer intends to divert the asset / align the development, so as to prevent the potential for damage to subsurface potable water infrastructure, must be submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any construction must be undertaken in accordance with the terms of the approved information. Unrestricted access must be available at all times for the maintenance and repair of the asset during and after the construction works. Reason: The proposed works will be in close proximity to underground strategic water main, utility infrastructure. The works has the potential to impact on local underground water utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. <https://www.thameswater.co.uk/developers/larger-scale-developments/planning-yourdevelopment/working-near-our-pipes> Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk.

The proposed development is located within 15m of a strategic water main. Thames Water request that the following condition be added to any planning permission. No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface water infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement. Reason: The proposed works will be in close proximity to underground water utility infrastructure. Piling has the potential to impact on local underground water utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. <https://www.thameswater.co.uk/developers/larger-scaleddevelopments/planning-your-development/working-near-our-pipes> Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk

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 3 activities during and after construction, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. <https://www.thameswater.co.uk/developers/larger-scale-developments/planning-yourdevelopment/working-near-our-pipes>

The proposed development is located within 15m of our underground water assets and as such we would like the following informative attached to any approval granted. The proposed development is located within 15m of Thames Waters underground assets, as such the development could cause the assets to fail if appropriate measures are not taken. Please read our guide 'working near our assets' to ensure your workings are in line with the necessary processes you need to follow if you're considering working above or near our pipes or other

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

Secure By Design

Application Number: HGY/2022/2116

Location: Hornsey Police Station 98 Tottenham Lane N8 7EJ

Proposal: Retention of existing Police Station building (Block A) with internal refurbishment, rear extensions and loft conversions to create 6 terrace houses and 4 flats. Erection of two buildings comprising of Block C along Glebe Road and Harold Road to create 8 flats and erection of Block B along Tottenham Lane and towards the rear of Tottenham Lane to create 7 flats and 4 mews houses including landscaping and other associated works

Dear Haringey Planning,

Section 1 - Introduction:

Thank you for allowing us to comment on the above planning proposal.

With reference to the above application we have had an opportunity to examine the details submitted and would like to offer the following comments, observations and recommendations. These are based on relevant information to this site (Please see Appendices), including my knowledge and experience as a Designing Out Crime Officer and as a Police Officer.

It is in our professional opinion that crime prevention and community safety are material considerations because of the mixed use, complex design, layout and the sensitive location of the development. To ensure the delivery of a safer development in line with L.B. Haringey DMM4 and DMM5 (See Appendix), we have highlighted some of the main comments we have in relation to Crime Prevention (Appendices 1).

I can confirm we have not met with the project design team to review Safety, Security or Crime Prevention.

We have concerns around some aspects of the design and layout of the development. At this point it can be difficult to design out fully any issues identified. At best crime can only be mitigated against, as it does not fully reduce the opportunity of offences.

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

Conditions/informative included

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

Section 2 - Secured by Design Conditions and Informative:

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

Conditions:

- A. Prior to the commencement of above ground works of each building or part of a building, details shall be submitted to and approved, in writing, by the Local Planning Authority to demonstrate that such building or such part of a building can achieve '**Secured by Design**' Accreditation. Accreditation must be achievable according to current and relevant **Secured by Design** guide lines at the time of above grade works of each building or phase of said development.

The development shall only be carried out in accordance with the approved details.

- B. Prior to the first occupation of each building or part of a building or its use, '**Secured by Design**' certification shall be obtained for such building or part of such building or its use and thereafter all features are to be retained.

Informative:

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

Section 3 - Conclusion:

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

Should the Planning Authority require clarification of any of the recommendations/comments given in the appendices please do not hesitate to contact us at the above office.

Yours sincerely,

Ian Waylen 1973CO

Designing Out Crime Officer
Metropolitan Police Service

<p>TFL</p>	<p>Having assessed the proposals, I can confirm that TfL Spatial Planning has no strategic comments to make on this planning application but has these specific observations:</p> <p>The development should comply with the transport policies set out in The London Plan 2021. In particular the car and cycle parking standards in tables 10.2 – 10.6 (inclusive). Cycle parking should comply with the London Cycling Design Standards (https://tfl.gov.uk/corporate/publications-and-reports/streets-toolkit).</p> <p>If the development is permitted I recommend the developer is reminded of the following: Tottenham Lane supports bus routes 41, N41 and N91. In the event that implementation of the development impacts users of those services such as alighting or accessing bus stops or requires the temporary re-routeing of bus services or other such arrangements, these must be agreed with TfL before the work. All vehicles associated with the development must only park / stop at permitted locations and within the time periods permitted by existing on-street restrictions.</p> <p>It is vital that construction work associated with the development is carried out in accordance with best practice, minimising impact upon vulnerable road users including cyclists on surrounding streets. TfL strongly encourages the use of construction contractors who are registered on the Fleet Operator Recognition Scheme and adhere to the CLOCS standard. Contractor vehicles should include side-bars, blind spot mirrors and detection equipment to reduce the risk and impact of collisions with other road users and pedestrians on the capital's roads. Further information can be found here: https://constructionlogistics.org.uk/.</p> <p>Comments received dated 05/07/2023</p> <p>Many thanks for consulting TfL on the above application; however considering the scale, nature and location of the proposal TfL has no objections or comments to provide.</p>	<p>Comments noted/informative included</p>
-------------------	---	--

<p>London Fire Brigade</p>	<p>The London Fire Commissioner (the Commissioner) is the fire and rescue authority for London. The Commissioner is responsible for enforcing the Regulatory Reform (Fire Safety) Order 2005 (as amended) in London.</p> <p>The Commissioner has been consulted with regard to the above-mentioned premises and makes the following observations:</p> <p>The Commissioner is satisfied with the proposals</p> <p>Other comments: Providing you provide sprinkler protection to extend the hose distance to 75m in houses that do not meet the 45m hose length in accordance with BS 9991 as outlined in your fire statement. As per Approved Document B B5 for access and facilities for the fire service.</p>	<p>Comments noted/informative included</p>
<p>Neighbouring Properties</p>	<p>Land Use and housing</p> <ul style="list-style-type: none"> - No affordable housing provision - Excessive number of dwellings proposed - Concerns the affordable housing is in a separate block - There should be no distinction between the private and affordable blocks - Concerns the affordable housing does not meet required space standards 	<p>Land Use and housing</p> <p>There is affordable housing provision.</p> <p>The number of dwellings proposed do not generate design or density concerns</p> <p>The affordable block would be of the same high quality residential scheme as the private block and all housing</p>

	<ul style="list-style-type: none"> - Concerns with the viability of the scheme - The level of social housing should be increased - On site affordable housing should not be exchanged for a commuted sum - Affordable housing and extra care sheltered housing should be a priority - Flat C2 has no dedicated amenity space and no view to the communal garden - The site should be retained to benefit the local community - The loss of the police station will result in more crime in the area 	<p>meets the required space standards.</p> <p>The Council's independent viability consultant has reviewed the applicant's viability report and found that the proposal provides the maximum viable amount of affordable housing</p> <p>Delivery of housing is essential to meeting Local Plan Housing targets.</p> <p>As noted in the principle of development section, the disposal of the former Police Station site forms part of a wider programme to deliver public services and that the Borough Commander has</p>
--	--	--

	<p>Impact on Heritage Assets</p> <ul style="list-style-type: none">- Design not in keeping with the Conservation Area- The height is not in keeping with the Conservation Area- The internal building should be refurbished rather than extended- Aluminium windows should not be allowed in the Conservation Area- The existing police station façade should be retained- Harm to the Conservation Area	<p>provided assurances that the policing of the area will remain available to meet the ongoing needs of the local population the proposed loss of the police station is considered acceptable</p> <p>Impact on Heritage Assets</p> <p>The proposed development will lead to a very low, less than substantial harm to the significance of the conservation area and its assets that is outweighed by the several significant public benefits of the development. The remainder of the scheme is considered to preserve the character and</p>
--	--	---

	<p>Size, Scale and Design</p> <ul style="list-style-type: none"> - The design is not in keeping with surrounding properties - The design is not in keeping with the existing Police Station building - The design of block C is bland - The design lacks character - The communal garden needs soft landscaping - Poor quality design - The scheme should be redesigned - The development should be significantly reduced in scale - Excessive height, bulk, massing and scale of block B - Concerns with the exact height of the mews houses - Overbearing in relation to neighbouring buildings - Overdevelopment of site - The design of the new blocks should be similar to the retained police station building - The low boundary wall on Tottenham Lane should be repaired - Block C should be set further back from the pavement - The skyline will be obscured by the development - The amendments to the scheme are not sufficient <p>Impact on neighbours</p> <ul style="list-style-type: none"> - Loss of privacy/overlooking/overshadowing - A daylight assessment should be carried out - Loss of daylight and sunlight - Noise and disturbance - The balconies of the mews houses at first floor level should be removed - The development is in close proximity to the Firemans Cottages 	<p>appearance of the conservation area.</p> <p>Size, Scale and Design</p> <p>From a design point of view, the proposed design and scale of the development remains a high-quality design that is in-keeping with the approved development and surrounding area in line with the relevant policies</p> <p>This proposed development is considered appropriate in this location</p> <p>Impact on neighbours</p>
--	---	---

	<p>Parking, Transport and Highways</p> <ul style="list-style-type: none"> - Pressure on parking - Road safety concerns - EV charging points should be provided for parking and cycle storage - The central communal space should be retained for parking - Parking should be provided - Concerns with delivery and servicing vehicles using the mews lane - Parking permits should be restricted for future occupants - Concerns parking with take place outside CPZ operation times - Disabled parking bays should be provided - Underground parking should be considered <p>Environment and Public Health</p> <ul style="list-style-type: none"> - Significant increase in pollution - Increased emissions - Noise pollution 	<p>As noted in the neighbouring amenity section the proposal would not have a significant impact on neighbouring properties in terms of privacy, daylight or sunlight. The proposal will not result in any greater noise or light levels than should be expected in an urban area.</p> <p>Parking, Transport and Highways</p> <p>The Transportation Officer has assessed these points and which have been covered in the main body of the report and concludes that the proposed development is considered acceptable, in regard to transport</p>
--	---	--

	<ul style="list-style-type: none"> - The courtyard space should be publicly accessible - The applicants should consider a new tree at the pedestrian crossing to provide more screening - Insufficient refuse provision - Planting will need to be maintained well 	<p>imposition of a condition.</p> <p>The scheme would provide CIL payment towards local infrastructure.</p> <p>The courtyard space being gated will help prevent anti-social behaviour</p> <p>Adequate new trees are provided within the communal amenity space</p> <p>The Council's Waste Management Officer is satisfied with the proposed arrangement for the refuse/recycling bin collection.</p> <p>The long term management of the planting is secured via a condition</p>
--	--	--

--	--	--

Appendix 4 QRP Reports

CONFIDENTIAL



London Borough of Haringey Quality Review Panel

Report of Formal Review Meeting: Hornsey Police Station

Wednesday 27 April 2022

Clockwise, Greenside House, 50 Station Road, London N22 8LE

Panel

Peter Studdert (chair)
Phil Armitage
Louise Goodison
Phyllida Mills
David Ubaka

Attendees

Robbie McNaugher	London Borough of Haringey
John McRory	London Borough of Haringey
Richard Truscott	London Borough of Haringey
Joe Brennan	Frame Projects
Kate Trant	Frame Projects

Apologies / report copied to

Valerie Okeiyi	London Borough of Haringey
Aikaterini Koukouthaki	London Borough of Haringey
Sam Uff	London Borough of Haringey

Confidentiality

This is a pre-application review, and therefore confidential. As a public organisation Haringey Council is subject to the Freedom of Information Act (FOI), and in the case of an FOI request may be obliged to release project information submitted for review.

CONFIDENTIAL

1. Project name and site address

Homsey Police Station, 98 Tottenham Lane, N8 7EJ

2. Presenting team

Chris Boyle	Archanaeum
Kuan Leng	Dixon 8
Rie Nijo	Rie Nijo Architects

3. Planning authority briefing

The site is located on the corner of Harold Road and Tottenham Lane in Hornsey, in the Hillfield Conservation Area. Immediately south of the carpark / service yard, partially comprising the site, is a row of two-storey houses on Church Lane, and to the southwest is the two-storey Firemans Cottages and two-storey terraced houses on Glebe Road. Tottenham Lane local centre is immediately east of the site, comprising a shopping parade with commercial units at ground floor and residential flats above.

The principal building currently occupying the site is the 'L'-shaped, part two-storey, part three-storey Homsey Police Station, built in 1915. Built of red brick with terracotta banding and window surrounds, the police station replaced an earlier one, c1868, and originally formed part of a group of civic buildings including a public library and fire station. Access to the police station's carpark/service yard is off Harold Lane.

The proposal comprises the refurbishment and extension of Homsey Police Station and the construction of two new residential buildings to provide 30 units and associated landscaping.

CONFIDENTIAL

4. Quality Review Panel's views

Summary

The panel broadly supports the proposals for Homsey Police Station, feeling that it has the potential for a high-quality scheme. The conceptual approach of 'weaving the past with the present' is promising in the context of the conservation area and existing historic building. However, it recommends that this idea is developed further. For example, it suggests that Block C could be more exuberant, using cues from the conservation area, to give this important corner block greater presence. The scale of Blocks A and B at Tottenham Lane seems appropriate given the surrounding area. However, the panel questions the scale of the mews housing element of Block B, which it suggests is likely to be more viable at two storeys than three. The panel is also concerned about how the level changes across the site are addressed currently and recommends further detailed sectional analysis of this aspect of the scheme. Similarly, the panel is not yet convinced by the proposed layouts of individual residential spaces and suggests further detailed consideration of this in order to improve the quality of the interior spaces. The panel has some concerns about the scheme's environmental and energy strategy, commenting that these appear to be being considered late in the scheme's development. It also has some concerns about the complexity of the landscaping of the internal courtyard.

Architecture

- The panel admires the conceptual approach to 'weaving the past with the present' and its potential to underpin the architectural approach. However, it feels that this concept would be further strengthened if more rigorously applied across the whole scheme.
- The panel would encourage retention of the existing police station staircases in Block A.
- The panel supports the use red brick throughout the scheme, seeing it as appropriate to the immediate context and adjacent conservation area, and in keeping with the materiality of the existing police station.
- it feels that the concept of 'weaving' could be taken much further to add variation, depth and interest to the facades and to the overall scheme.
- The panel questions the type and placement of the windows at various locations in the scheme. Further consideration of these may lead to improvements in the quality of daylight brought into the interiors across the development, as well as its external appearance.
- The panel is not yet convinced by the roof detailing of the new-build section of Block A and recommends careful consideration of the choice of materials for this roof, including the gutter detailing.



CONFIDENTIAL

- In relation to the above point, improving the quality of light brought into the top floor apartments in Block A will be a key determinant of the design of the roof.
- The panel admires the way that the Block B entrance offers a direct view into the courtyard, suggesting that decisions about the cladding of the entrance will be key to the success of its design.

Interior layouts

- The panel recommends further detailed consideration of the internal layouts of the houses and flats, to maximise the quality of the interior spaces for the users.
- For example, one of the new-build flats on Tottenham Lane proposes a dining area with no window. The panel appreciates that this is to prevent overlooking of the refuse store but suggests further thought about the quality of this unit.

Block C

- The panel suggests that Block C could be more exuberant, using cues from the conservation area, to give this important corner block greater presence.
- The panel asks for further thought about the relationship between Block C and the adjacent Firemans Cottages, where currently its first and second floor balconies are tight against the gable end walls.

Block B mews

- The panel is concerned about the mews component of Block B and the proposed scale of the houses at three storeys, where it feels that two storeys would be more appropriate.
- The associated problems caused by large, three- and four-bedroom houses in relation to provision for private vehicles / parking are also a concern, as is the restricted size of their living / dining spaces.
- The panel also suggests that two storeys will be more compatible with the narrow entrance to the mews from Tottenham Lane, and that the materiality of this entrance will be important to the success of that significant corner of the scheme.

Scheme layout

- The panel suggests relocating the refuse stores currently along Tottenham Lane. Whilst this location is ideal for refuse collection, there is a risk they will have a negative impact on that street frontage.



CONFIDENTIAL

- The panel recommends further sectional analysis of the two-metre level change across the site. Currently, this appears to be creating some uncomfortable relationships between elements of the development.
- For example, if the mews level was brought to the level of the courtyard space, this might increase the sense of this as a single generous garden space.

Landscape

- The panel feels that the courtyard is a generous offer, but that its design is overcomplicated by the introduction of multiple levels and recommends further consideration of this aspect of the landscape design.
- For the courtyard to be successful as a shared space, it will be important to resolve its relationship with the surrounding private gardens. For example, boundary treatments will need careful thought to ensure the courtyard is welcoming and attractive.
- The panel recommends further thought about how the landscape design responds to the site's sunpath.

Parking strategy

- The panel recognises the work done on the parking strategy so far, particularly given the complexities of changes to the local parking provision. It recommends that the details—particularly of the disabled parking—are pinned down swiftly.
- The panel recommends that further clarity is sought from the council regarding the extent to which parking previously allotted to the police station will contribute to the scheme's provision.
- Providing additional electric vehicle charging points on surrounding streets could contribute well to the parking strategy, which is not intended to increase the parking provision in the area.

Sustainability

- Further thought is needed to refine the development's environmental and energy approach. For example, it highlights that PVs located on flat roofs of the three-bedroom houses may be overshadowed by the second floor accommodation to their south.
- Generally, the panel recommends the positioning of PVs on roofs should be thought of as an integral part of the overall design approach.
- The panel suggests that the development's heating strategy could be improved with heat pumps rather than electric boilers.
- If heat pumps are provided, their location will need careful thought in terms of noise and visual impact.



CONFIDENTIAL

- The environmental and heritage aspects of retaining the existing single-glazed windows need to be developed further.
- The panel suggests the introduction of secondary glazing or new double glazed sash windows to match the existing appearance.
- The panel questions the scheme's form factor; the large surface area of the scheme poses a challenge in terms of thermal efficiency.

Next steps

The panel would be pleased to consider the proposals again at a chair's review, if required.



FRAME PROJECTS

London Borough of Haringey Quality Review Panel

Report of Chair's Review Meeting: Hornsey Police Station

Wednesday 17 August 2022

Room 5M1, Clockwise Wood Green, Greenside House, 50 Station Road, London N22
7DE

Panel

Peter Studdert (chair)
Louise Goodison

Attendees

Rob Krzyszowski	London Borough of Haringey
Robbie McNaugher	London Borough of Haringey
Valerie Okeiyi	London Borough of Haringey
Richard Truscott	London Borough of Haringey
Kate Trant	Frame Projects
Joe Brennan	Frame Projects

Apologies / report copied to

Suzanne Kimman	London Borough of Haringey
Aikaterini Koukouthaki	London Borough of Haringey
John McRory	London Borough of Haringey
Elizabetta Tonazzi	London Borough of Haringey
Deborah Denner	Frame Projects

Report of Chair's Review Meeting
17 August 2022
HQRP125_ Hornsey Police Station

1. Project name and site address

Homsey Police Station, 98, 96 and 94 Tottenham Lane, London N8 7EJ

Planning application reference: HGY/2022/2116.

2. Presenting team

Chris Boyle Archanaeum

3. Planning authority briefing

The site is located on the corner of Tottenham Lane, Harold Road and Glebe Road in Homsey, to the west side of Tottenham Lane / north side of Harold Road / east side of Glebe Road. The existing building is 'L'-shaped in form and comprises a retained part two-storey, part three-storey building known as Homsey Police Station, primarily fronting Tottenham Lane, with a long lower wing fronting Harold Road.

The site has a PTAL rating of 4, considered 'good' access to public transport services. Five different bus services are accessible within three to five minutes' walk of the site, and Homsey Railway Station is a five- to six-minute walk away.

The site is located within the Hillfield Conservation Area, which also includes the Fireman's Cottages and all the other properties on Harold Road, but no other properties or spaces on Tottenham Lane, Church Lane or Glebe Road. The prominently sited police station building, together with its tall red brick boundary walls, makes a positive contribution to the character and appearance of this part of the conservation area.

Since the previous Quality Review Panel meeting, the applicants have revised the scheme in response to the panel's and officers' comments, pre-app presentation to the planning committee and ward members and their public consultation. A planning application has now been submitted.

Officers support the principle of converting the existing police station and redeveloping the remainder of the site for residential use, subject to reassurances that it will not result in the overall reduction in public safety / policing services in the locality and the borough more generally.

The panel's formal response to the submitted scheme is requested.



4. Quality Review Panel's views

Summary

The panel appreciates the applicant's constructive response to comments made at the previous Quality Review Panel meeting (27 April 2022), and the subsequent improvements to the proposal, and is broadly supportive of the scheme. The panel feels that the revised proposal has the potential to create a high-quality development that will make a positive contribution to the local area. The architecture of the proposed new residential blocks seems appropriate given the materiality and scale of the largely brick Victorian and Edwardian buildings of the surrounding area. The panel still feels that the elevation of Block C at the corner of Glebe Road and Harold Road facing the conservation area needs more variety in materials. The panel also encourages further thought about the security of windows at low level, which need to be fully openable to maximise ventilation. It supports the layout and landscaping of the shared courtyard, and the design approach to the three gateways to the development, on Tottenham Lane and Harold Road. The panel emphasises the importance to the scheme's success of carrying through the detailing, to prevent its being subject to value-engineering as it approaches construction.

Architecture

- The panel is supportive of the 'weaving past and present' theme and feels that the new-build aspects of the scheme bring contemporary ideas to the development that sit well alongside the existing building.
- The panel underlines the importance of ensuring high-quality detailing throughout the scheme and that this cannot be diminished through value-engineering.
- The panel welcomes the progress made in the development of the internal layouts of the flats, which it sees as an improvement on the previous proposals.
- The panel suggests further consideration of the scheme's window detailing in relation to ventilation and safety, particularly in Block C. This might include the introduction of guardrails, or alternatives to fully opening windows.
- The panel still feels that, in contrast to the rich palette of the conservation area, the appearance of Block C is too uniform in texture and, in particular, is pleased that the Glebe Road elevation will be considered further.
- The panel has reservations about using brick as the roofing material for Block C — where, given the local context, this might be expected to be slate — but appreciates that this forms part of the 'weaving' theme. If brick is to be used, the panel stresses the importance of ensuring that this aspect of the scheme is well detailed in order to create a richness of texture.



- The panel finds successful the way that the architecture of the new additions flows from the existing police station frontage and is also happy that each unit has a 'front' and a 'back'.

Access strategy

- The panel supports the re-positioning of the refuse / bin stores on the site, feeling that, as well as eliminating their negative impact on the Tottenham Lane frontage, the new locations will be more functional.
- It also welcomes the parking provision for wheelchair-accessible and family units, noting that on-street parking for the development will be for 13 spaces (an increase of two spaces from the dedicated police parking of 11).
- The panel feels that access to the wheelchair-accessible units in Block B has been adequately addressed by the inclusion of a platform lift where there are three steps, level access to the lift, ample circulation space and access into / out of units, acknowledging that the details are to be finalised.

Landscape

- The panel welcomes the simplification of levels of the interior courtyard, the softer separation using trees and planting, and the more integrated landscaping, feeling that these revisions have created a calmer environment. As elsewhere, the panel stresses the importance of the high-quality detailing of this aspect of the development.
- Equally, the panel highlights that management of the development's communal spaces will be key to its success.

Next steps

The panel is confident that the issues outlined above can be addressed by the project team in consultation with Haringey officers and, on this basis, is happy to support the scheme.



Appendix 5 - Development Forum minutes

- Query on turning the corner at Glebe Road
- Out of keeping with the character of the area
- No defensible space
- The neighbouring houses have front gardens
- Too close to the corner
- Concerns the affordable housing block is different in character to the rest of the existing building
- Impact on neighbouring building from mews houses
- The mews houses will tower over the neighbours
- Overlooking/loss of privacy concerns
- Parking pressures
- Concerns with delivery/servicing vehicles
- Issue raised about refuse collection and emergency vehicles
- Subsidence to neighbouring properties from the mews house development
- Structural concerns
- Overbearing
- No CGI provided from the gardens of the neighbours on Church Lane and Glebe Road
- Impact on parking
- Parking permits will have a major impact
- Who will be responsible for the landscaping
- Block C the affordable block looks very plain
- There are no trees facing the street
- How about visitor permits
- The corner façade of block C on Glebe Road and Harold Road is imposing. Its needs to be softer in appearance
- Disruption from building works
- Query on parking capacity
- Concerns with construction vehicles
- Block C looks cheaper because it is the affordable block
- Who owns the police station site
- Will the Council commission their own traffic study
- Concerns with flytipping/overflowing refuse

Appendix 6 - Pre-application Committee minutes

Pre-Application Briefing to Planning Sub-Committee – Monday, 11 July 2022

1. DETAILS OF THE DEVELOPMENT

Reference No: PPA/2022/0006

Ward: Hornsey

Address: Hornsey Police Station 98 Tottenham Lane N8 7EJ

Proposal: Retention of existing Police Station building (Block A) with internal refurbishment, rear extensions and loft conversions to create 6 terrace houses and 4 flats. Erection of two buildings comprising of Block C along Glebe Road and Harold Road to create 8 flats and erection of Block B along Tottenham Lane and towards the rear of Tottenham Lane to create 7 flats and 4 mews houses including landscaping and other associated works

Applicant: Kuan Wai Leng Koukan Developments Ltd

Agent: Kuan Wai Leng Koukan Developments Ltd

Ownership: Private

Case Officer Contact: Valerie Okeiyi

2. BACKGROUND

- 2.1 The proposed development is being reported to the Planning Sub-Committee to enable members to view it ahead of the submission of the planning application. Any comments made now are of provisional nature only and will not prejudice the final outcome of any formally submitted planning application
- 2.2 It is anticipated that the planning application, once received, would be presented to the Planning Sub-Committee in November / December 2022. The applicant is currently engaged in pre-application discussions with Haringey Officers.

3. SITE AND SURROUNDS

- 3.1 The site is located on the corner of Harold Road and Tottenham Lane in Hornsey and to the north side of Harold Road/West side of Tottenham Lane. The building occupying the site is 'L' shaped in form and comprises a part two storey, part three storey building known as Hornsey Police Station. There are a number of ad-hoc single-storey structures contained within the service yard/car park which is accessed off Harold Road.
- 3.2 Immediately south of the car park/service yard is a row of two storey terrace houses on Church Lane and to the south west is the two storey building known as Fireman's Cottages and two storey terrace houses on Glebe Road.

Tottenham Lane Local Centre is located immediately east of the site and comprises of a shopping parade with commercial units on the ground floor and residential flats on the upper floors

- 3.3 The site has a public transport accessibility level (PTAL) of 4, considered 'good' access to public transport services. Five different bus services are accessible within 3 to 5 minutes' walk of the site, and Hornsey Railway Station is a 5 to 6 minute walk away.
- 3.4 The site is located within the Hillfield Conservation Area. The prominently sited Police Station building together with its tall red brick boundary walls, makes a positive contribution to the character and appearance of this part of the conservation area.

4. PROPOSED DEVELOPMENT

4.1 The proposed works would involve:

- The conversion of the existing Police Station (Block A) to residential units and the redevelopment of land around it (Blocks B and C) to create 29 flats/houses in total;
- Block A, along Tottenham Lane and Harold Road will include internal refurbishment, rear extensions and loft conversions and would comprise of 6 terrace houses and 4 flats;
- Block B (new build), along Tottenham Lane and towards the rear of Tottenham Lane would be 3 to 4 storeys in height and comprise of 7 flats and 4 mews houses;
- Block C (new build), along Glebe Road and Harold Road will be 3 storeys in height and comprise of 8 flats;
- Houses 1 and 2 in Block A and flat B3 on the first floor of Block B would be wheelchair accessible;
- Associated rationalised landscaping including, public realm improvements including amenity space and playspace;
- Cycle stores;
- Bin stores;
- Car free development with 3 wheelchair accessible onstreet parking bays on Harold Road.

5. PLANNING HISTORY

- 5.1 The site has planning history dating back to 1993 but nothing relevant to the scheme at pre-application stage.

6. CONSULTATION

6.1 **Public Consultation**

6.2 This scheme is currently at pre-application stage and therefore no formal consultation has been undertaken as yet. However, the applicant has recently undertaken their own pre-application engagement with the local community which consisted of a wide scale leaflet drop to properties in the local area informing residents of the pre-application scheme together with an arranged exhibition hosted by the developers which included a presentation of the scheme to local residents who attended

6.3 Quality Review Panel

6.4 The proposal was presented to the Quality Review Panel (QRP) on 27 April 2022. The report from the QRP Formal Review is attached as **Appendix 1**.

6.5 The Panel broadly supports the proposals for Hornsey Police Station, stating that the scheme is showing potential for achieving a high-quality scheme. The conceptual approach is supported in the context of the conservation area and the existing historic building (former police station). However, the panel did express suggestions of how the scheme could be improved and what aspects of the scheme required further thought and work. The panel was satisfied for officers to pursue further discussions with the developer and that it did not need to be presented to the QRP again.

6.6 Following the QRP meeting, the scheme has been amended in order to address officer and QRP comments and suggestions.

6.7 Development Management Forum

6.8 The pre-application proposal is to be presented at a Development Management Forum on 5th July 2022. Comments received will be fed back verbally to members on the 11th July.

7. MATERIAL PLANNING CONSIDERATIONS

7.1 The Council's initial views on the development proposals are outlined below:

Principle of the development

The Police Station currently occupying the site has been closed and redundant for some time – the closure of Hornsey Police Station formed part of the Metropolitan Police Service's rationalisation and investment programme to close old outdated buildings to reduce costs and provide modern, new facilities to support future policing across London. The money raised from the sale of the site is re-invested into modern ways of working, and supporting the Mayor's Office for Policing and Crime (MOPAC)'s Police and Crime Plan 2017 - 2021.

Although the Police Station has been closed and un-operational for some time now, in land use planning terms the pre-application proposal would result in the loss of the site as a community facility – Appendix F of the Council's Development Management DPD defines police buildings as a community facility. The Council essentially seeks to protect the loss of community facilities whilst maintaining and improving community safety in the Borough. Further, Policy D11 of the London Plan seeks to maintain a safe and secure environment.

The developer will be required as part of any formal submission of a planning application to evidence relevant planning policy justification for the loss of the Police Station site from community use to residential use. Policy DM49 Managing the Provision and Quality of Community Infrastructure states that A) the Council will seek to protect existing social and community facilities unless a replacement facility is provided which meets the needs of the community. It goes on to state that B) where a development proposal may result in the loss of a facility, evidence will be required to show that: a) the facility is no longer required in its current use; b) the loss would not result in a shortfall in provision of that use; and c) the existing facility is not viable in its current use and there is no demand for any other suitable community use on site. Policy DM49 C) also requires evidence and marketing information demonstrating that the premises has been marketed for use as a community facility for a reasonable length of time (minimum 12 months) and that no suitable user has been/or is likely to be found.

Given that the proposed closure and disposal of Hornsey Police Station forms part of the Metropolitan Police Service's rationalisation and investment programme, Officers consider that policy DM49 A), B)) b) and part of c) are met subject to reassurances that the loss of the police station will not result in the overall reduction in public safety/policing services in the locality and the Borough more generally. Further evidence is required to demonstrate that parts c) and C) of the policy are also met i.e. there is no demand for any other suitable community use on site, supported by marketing information.

Design, Appearance and Heritage Impact

Hornsey Police Station is a three-storey building, constructed in 1915, designed in a Baroque style by John Dixon Butler, architect to the Metropolitan Police. It is built in bright-red brick with terracotta banding and window surrounds, six-over-six pane sash windows and a bold pedimented entrance inscribed 'POLICE'. It replaced an earlier police station of c1868 and originally formed part of a fine group of civic buildings including a public library, demolished in the 1960s after

the library was relocated to Crouch End, and a fire station, also demolished. Hornsey Police Station is located within the Hillfield Conservation Area. The most recent appraisal identified the building, together with its tall red brick boundary walls, as making a positive contribution to the character and appearance of this part of the conservation area. The retention of the historic police station building (known as block A) is therefore supported.

Officers consider that taking into consideration the historic development of the site and the existing townscape, the site can accommodate additional development. Officers consider that the height, massing and scale of the proposed 'new build' part of the development to be acceptable within the site's context and existing built form of surrounding buildings.

The contemporary reinterpretation of the Police Station (Block C – which is the 'new build' part of the scheme) is promising subject to further refinements such as adding more interest to the corner gable and upper floor balconies. From a design point of view, the architectural concept of the 'weaved chequered board pattern' works well within its context.

In terms of Block B (also part of the 'new build' part of the scheme), the retention of the gap between the proposed development and the police station building maintains a clear separation between the historic building and the proposed contemporary development. The proposed brickwork for this block matches the brickwork of the Police Station, retaining some connection with the historic building while the contemporary design of the proposed block creates a contrast and distinct separation between old and new. The rhythm of the windows reflects the pattern of fenestration of the former Police Station and adds interest to the proposed block. From a Conservation point of view, although block B is considered a fine piece of architecture, the conservation officer has a concern that the building may appear alien in its surroundings. The design of the mews houses of block B towards the rear of Tottenham Lane would appear subservient in terms of height and scale.

The central communal landscaped garden has progressed. A good quality landscaped plan is fundamental to the success of the scheme. Public realm improvements are also proposed.

Residential Unit Mix and Affordable Housing

The proposal would provide 6 x 1 bed flats, 11 x 2 bed flats, 2 x 3 bed flats, 6 x 3 bed houses and 4 x 4 bed houses of which include 3 wheelchair accessible units. This range of unit sizes is considered appropriate in this location and optimises the use of the site to meet housing need particularly the need for family sized accommodation.

The scheme proposes 7 Affordable Housing Units of which 5 can be rented (London Affordable Rent) and 2 intermediate (Shared Ownership) this equates to 24% affordable units. The affordable units would be located in block C

The developer's viability report will be submitted as part of any formal planning application and thereafter independently assessed to ensure that the proposal provides the maximum amount of affordable housing that can viably be delivered as part of the proposed scheme.

Transportation and Parking

This site has a public transport accessibility level (PTAL) of 4, which is considered 'good' access to public transport services. Several bus services are accessible within 3 to 5 minutes' walk of the site, and Hornsey Railway Station is a 5 minutes walk from the site.

The site is also located within the Hornsey South CPZ, which has operating hours of 11.00 to 13.00 Monday to Friday.

The proposed scheme would be a car free development. With a public transport accessibility level of 4 the pre-application scheme does meet the criteria of Policy DM32 of the Development Management DPD for formal designation as a car free/permit free development. Cycle parking stores will be located in each block. The cycle parking to be provided will need to meet London Plan standards for residential in terms of absolute numbers. Any future planning application will require full details of cycle parking which will be scrutinised by officers to confirm it will be achievable within the development footprint. Three blue badge spaces for the accessible units would be provided which is policy compliant (10% of the overall number of residential units).

Discussions are ongoing with the Council's Transport Planning team who require a parking stress survey to be carried out for the existing arrangements to provide details on the existing parking conditions and provision. In addition to this the developer will likely be required to provide mitigation measures to reduce potential parking impacts and promote the use of sustainable and active modes of travel.

Impact on residential amenity

The windows of the proposed mews houses (Block B) towards the rear of Tottenham Lane would need to be designed to ensure they mitigate potential overlooking and loss of privacy issues to the rear garden and windows of the surrounding properties, in particular the neighbours on Glebe Road and Tottenham Lane.

Further assessment will be required in relation to existing and newly published BRE guidelines in relation to daylight / sunlight requirements so as to ensure that the amenity of neighbouring residents is not materially affected.

Other matters

Consideration on the following matters is also required – but has not yet been discussed in detail:

- Flooding and drainage (the site is in a critical drainage area);
- Energy strategy;

Appendix 7 - Financial Viability Assessment (FVA)



Our ref: DB/J043226

Valerie Okeiyi
Principal Planning Officer
Haringey Council
5th Floor Alexandra House,
Wood Green,
London
N22 7TR

16 June 2023

Dear Valerie

Former Hornsey Police Station, 98 Tottenham Lane, London, N8 7EJ

Further to our recent correspondence, we provide a summary of the negotiations which have been concluded with the applicant.

GL Hearn were instructed by LB Haringey to undertake a due diligence review of a Financial Viability Assessment (FVA) submitted in support of planning application HGY/2022/2116 submitted for a residential development at Former Police Station, 98 Tottenham Lane, Hornsey, London, N8 7EJ.

The proposal is for the following description of development:

"Retention of existing Police Station building (Block A) with internal refurbishment, rear extensions and loft conversions to create 6 terrace houses and 4 flats. Erection of two buildings comprising of Block C along Glebe Road and Harold Road to create 8 flats and erection of Block B along Tottenham Lane and towards the rear of Tottenham Lane to create 7 flats and 4 mews houses including landscaping and other associated works"

The following table summarises the key inputs and assumptions adopted within the proposed scheme to formulate the initial Residual Land Value for the March 2023 Financial Viability Review:

Confidential

GL Hearn Limited
6 Devonshire Square,
London, EC2M 4YE

T: +44 (0)20 7851 4900
glhearn.com

March 2023 Assumptions

Input	GLH Assumptions	Andrew Golland Assumptions
Residential Floor Area NSA (sq ft)	28,544	24,348
Construction Cost	£7.583m	£7.813m
Contingency	@5% inc. in build costs	@5% inc. in build costs
Finance Rate	6.75%	6.75%
Planning Obligations	£861,017	£861,017
Professional Fees	8% on Construction Costs	12% on Construction Costs
Residential Disposal Costs	£3.0% of GDV	£3.0% of GDV
Gross Development Value	£21.640m	£19.297m
Residual Land Value	£6.773m	£3.847m
Developer's Profit	17.5% on GDV	20% on GDV
Timescale		
Pre-Construction	3 Months	n/a
Construction	14 Months	n/a
Sale	6 Months	n/a

GL Hearn has subsequently had discussions with Andrew Golland Associates and Blackacre and have accepted the following inputs and assumptions:

Input	Agreed Upon Assumptions
Residential Floor Area NSA (sq ft)	28,544
Construction Cost	£7.703m
Contingency	@5% inc. in build costs
Finance Rate	7.50%
Planning Obligations	£868,617
Professional Fees	10% on Construction Costs
Residential Disposal Costs	£3.0% of GDV
Gross Development Value	£21.365m
Residual Land Value	£3.991m
Developer's Profit	17.5% on GDV
Pre-Construction	6 Months
Construction	18 Months
Sale	6 Months
Pre-Sale %	30%

In the initial proposal there was no mention of a proposed tenure split of the affordable housing, however the applicant has now proposed 8 units of London Affordable Rent following discussions. This is not in line with the boroughs policy of 60% Social Rent/Affordable Rent and 40% intermediate housing.

The proposed scheme has been appraised based on the above inputs, and has further been tested against a range of construction costs and residential sales, resulting in the following range of RLV:

		-5%	-2.5%	0%	+2.5%	+5%
Residential Gross Sales	-5%	£3.752m	£3.571m	£3.390m	£3.208m	£3.027m
	-2.5%	£4.053m	£3.871m	£3.690m	£3.509m	£3.327m
	0%	£4.353m	£4.172m	£3.991m	£3.809m	£3.628m
	2.5%	£4.654m	£4.473m	£4.291m	£4.110m	£3.928m
	5%	£4.955m	£4.773m	£4.592m	£4.410m	£4.229m

When compared to the Benchmark Land Value of the site which is £3.993m it is clear there is capacity for the scheme to provide additional affordable housing without impacting the viability of the site.

GL Hearn proposed Scheme RLV	BLV	Surplus / Deficit	Exceeds BLV Y / N
£3.991m	£3.993m	-£0.002m	N

The scheme as proposed (8 LAR units) both meets, and is capable of, supporting contributions towards the LPA's affordable housing provision. However the provision of an all London Affordable Rented scheme, is deemed acceptable in this instance for affordability and saleability on to an affordable housing provider reasons.

The Residual Land Value of the scheme has been assessed against the Existing Use Value (EUV) of the police station which was concluded to be £275psf. A 20% premium was considered to be reasonable to incentivise the landowner to sell the land and therefore the Benchmark Land Value was concluded to be £3.993m.

We have therefore concluded that the development is unable to provide additional affordable housing than proposed (8 LAR units) or a payment in lieu of on site provision.