Appendix 4 – Consultation Responses from internal and external agencies

Stakeholder	Question/Comment	Response
INTERNAL		
Design	Context Braemar Road Baptist Church is a striking and Statutory Listed (Grade II) late nineteenth century, non-conformist church, in an eclectic Gothic, Arts & Crafts influenced style, using a mixture of materials including red sandstone and a smooth dark red brick for quoins, string courses, door and window surrounds, with dramatically contrasting, richly textured, grey-to-white, knapped flint infill to wall panels. The church frontage faces the south-west side of Bounds Green Road, a major arterial road running south-east to north-west, from Wood Green to Southgate, with its main frond door and main gable window facing this street, and an off centre tower on the corner of Braemar Avenue on its right. This street runs along the side of the church, with aisle windows beneath its great pitched roof, a gabled transept and then the octagonal hipped altar end, being followed by later, early twentieth century additions and service entrances, in low, flat roofed, red brick boxes. Behind these is the "tin tabernacle", a simple, pre-fabricated, timber and corrugated iron structure facing Braemar Avenue; this was the initial church for the site whilst the permanent building was built, and subsequently became a church hall, but is now in an advanced state of collapse, and this along with the later extensions to the main church form the site for this planning application. Apart from the church, Braemar Avenue is a quiet cul-de-sac; a residential street made up of late nineteenth / early twentieth century, two-storey, terraced, predominantly red brick houses with strongly expressed gabled bay windows and short front gardens, typical of many streets in the area, and a contrast to busy Bounds Green Road, which, in addition to similar residential properties, has a number of larger, more monumental public and institutional buildings, like this church, as well as Trinity Gardens, a ribbon of parkland along its north-eastern side, opposite. The other, south-eastern side of the church is a further public park, Nightingale Gardens, which site over the shallow nineteenth century tunnel to the New River aqueduct. This linear park connects Bounds Green Road and Trinity Gardens with Station Road and Avenue Gardens to the south-west, close to Alexandra Palace Station, the nearest station, about a 10 minute walk away, with Wood Green Underground Station and the Metropolitan Town Centre of Wood Green some 15 minutes' walk to the south-east, and Bowes Park Station is a similar distance to the north. The side of the church and back of its outbuildings and tin tabernacle back onto Nightingale Park, but like the houses along Braemar Avenue make no attempt to address the park, being bounded by utilitarian timber or concrete boarded fences.	Comment noted

	As mentioned above, the church is Statutory Listed, Grade II, and as such the listing applies to the entire curtilage, including the later outbuildings and earlier Tin Tabernacle. Conservation Officer colleagues have provided detailed advice and comment on the building heritage and conservation qualities of these proposals, but it can be taken that from a design point of view the outbuildings and tin tabernacle are of much less heritage significance. It is also worth noting that pre-fabricated Tin Tabernacle temporary churches were build in very large numbers in the nineteenth century, and many others elsewhere (often starting out in better states of repair) have been preserved, including the very nearby Shaftsbury Hall, a community hall in Herbert Road, besides Bowes Park Station; https://maps.app.goo.gl/qUTJuszK1BgAXEe36. Proposals The proposals are to replace the outbuildings and tin tabernacle with new secondary church entrance, support facilities for the church and a new church hall, along with new residential properties including a home for the pastor and 14 other flats and maisonettes. The church and church hall entrance would be in a single storey, glazed link, attached to the church in place of the 20th century extensions, well set-back from Braemar Avenue via an attractively landscaped entrance courtyard, providing level access for their first time, with the opposite also fully glazed, looking onto and visible from Nightingale Gardens via a more open boundary fence for the first time. The remainder of the development is a building of four storeys plus a basement, containing the church hall, toilets and storage in the basement, as well as three basement and ground floor maisonettes facing Braemar Avenue, four flats on each of the first and second floors and two flats on the set-back third floor. This will appear as a three storey building, a gentle step up of one floor over the two storey houses adjacent and opposite, transitioning in height towards the taller church towers. The set back third floor will appear as a subsidiary roof structure, and its overall height will remain below the ridge height of the main church roof. This height therefore represents an acceptable transition from the low rise residential hinterland towards the greater height of more monumental buildings on the main Bounds Green Road frontage and is also appropriate for and compatible with the wider open space of Nightingale Gardens. The proposal's building line also steps back (as its height increases), in a series of gradual steps from the residential building line close to the pavement towards the much greater set-back of the main body of the church. The three distinct bays created in the three set-backs also match the rhythm of the terraced houses, expressed in their forward projecting bays. To the rear, the new building line steps forward in four gradual steps from the well-set back rear building line of the neighbouring houses, with their relatively long back	

	gardens, to align with the building line of the side wing of the church to the park side, giving the new flats a greater presence on, visibility from and views of Nightingale Park, whilst maintaining privacy to ground floor private gardens, with the new, more elegant, fence stepping up where the boundary of the church to the park becomes the residential boundary. The rhythm and proportions of the proposed fenestration will compliment and echo that of the residential terraced houses, with a predominantly vertical emphasis and larger windows matching those of the residential bay windows. There are modest balconies on the street frontage, recessed on the right side closest to the houses, semi-recessed corner balconies to the left side closest to the church, similarly transitioning on the park side from recessed close to the houses, through corner balconies, to fully projecting where the building is closest to the park, making full use of the open public space and providing animation to that park. Their balustrades are to be in a predominantly solid perforated metal providing privacy to residents and hiding any clutter. The main proposed materials are to be brick, in a carefully chosen variegated pink to compliment and provide a transition between both the houses and church. This will be complimented by metal panels to the sides of windows and to the set-back top floor, picking up on the contrasting knapped flint panels of the church and acting as a lighter, more roof and sky-like material for that set-back top floor, picking up on the slate of the residential roofs. These have already been subject to extensive discussion between officers and applicants but will be confirmed by condition requiring physical samples. Internally, the residential accommodation is universally of high quality, with room and flat sizes, as is to be expected, meeting or exceeding nationally described space standards, and private gardens, balconies or roof terraces meeting or exceeding London Plan private amenity space standards, notwithstanding that the location is also immediately adjacent to a large amount of public park space, containing childrens play facilities, sitting out and games areas. The new church facilities will improve its inclusivity for all users, providing much more visible, more welcoming, level access to the church, its hall and toilets. The new entrance and breakout area will be light and visible from both the street and the park, whilst the hall will be in the basement where noisy activities will be insulated from causing disturbance to the main church space and existing and proposed residential neighbours. The applicants have made it very clear over the course of pre-application discussions that views into and out of the church hall are not wanted, and therefore officers agree that a basement location is entirely suitable and appropriate. The applicants have assessed the daylight and sunlight levels achieved in the proposed homes and on existing neighbours, in accordance with the BRE Guide (2022). All the proposed homes achieve good levels	

	of daylight and sunlight to all their living rooms and the majority of their bedrooms, which is considered an exemplary achievement. No neighbouring existing residential properties would lose a noticeable amount of daylight to all their windows and there is no loss of sunlight to any neighbours. Some (five) windows to the immediate neighbour, no. 1 Braemar Avenue, would lose a noticeable amount of daylight, but these rooms would still also be lit by other windows that are unaffected, such that their room's daylight distribution is unaffected. The proposals have been carefully designed to avoid impact on trees, but such are the density of trees along the park boundary that some impact is unavoidable. The applicants have agreed with the council's relevant officers that one tree and a small number of smaller bushes can be removed on the boundary, to permit the development and give it greater visibility from and views of the park, and will be replaced with new trees within the park, providing better landscaping to the park as well as giving the park greater animation and passive surveillance from the development, including both some of the new housing and the new public frontage from the new church entrance space. The development is also expected to release funds for the church to make repairs to the original listed structure. Conclusion This proposal will be a modest but elegant new residential building, providing much needed new housing, as well as new, improved facilities for this church. It is designed to be complimentary to and act as a transition between the existing neighbouring housing and church, as well as improving its animation of the neighbouring park. Height, proportions, fenestration and materials are appropriate, elegant, promise to be durable, and give the proposals a confident, contemporary, yet complimentary appearance, picking up on neighbouring existing heights, proportions and materials in a modest contemporary interpretation. The proposed housing and new or replacement church facilities promise to be of excellent quality and greatly improve their relationship to the street and its neighbourhood, whilst being sensitive to the heritage and parkland settings. Show less	
Conservation	The development site sits in the setting of grade II listed, late Gothic Revival style, dark red brickwork and contrasting flintwork Braemar Avenue Baptist Church which is characterised by its prominent north corner tower footing Bounds Green Rd. To the immediate south of the church stands a corrugated iron Church hall in derelict conditions. The church hall was built at approximately the same time as the church. It is clad with corrugated metal with blue painted windows, has a rustic appearance, and makes a limited contribution to the street scene. Both the listed church and the development site are located on the western edge of Trinity	Comment noted and conditions attached

	Gardens Conservation Area, a predominantly Victorian residential area that includes three distinctive church buildings, which along with the Nightingale Primary School, form the local landmarks. The conservation area is here characterised by the landscaped openness of the Trinity Gardens and Nightingale Gardens which are a narrow-elongated park located to the immediate east of the development site and which extends south towards Wood Green Common and creates a green corridor by connecting Trinity Gardens with Avenue Gardens to the south. Trinity Gardens and Nightingale Gardens are included on the local list of Historic Parks and Gardens. Listed Braemar Avenue Baptist Church and St Michael's church are defining landmarks in east and west views across and into the conservation area along Bounds Green Road. Worth noting that only the northern section of Braemar Avenue is comprised within the Conservation Area here concluded by the striking Baptist Church with its prominent tower and The Towers, a positive contributor, large, red-brick Edwardian house located on the opposite side of the street. The proposed works entail: • Demolition of the temporary corrugate iron church hall • Demolition of the main church's 1950s extension • Construction of a new four storey above ground, mixed use building with recessed top floor and linked to the main church building at ground floor only. • Creation of glazed, walk-on lightwells to serve the basement level at pavement level. The development proposal has benefitted from extensive pre-application discussion and formal Design Review that have sought to address both the heritage sensitivity of the development site and the opportunity to manage change within heritage setting through informed and context- sensitive design. The architectural and visual primacy of the listed Church with its distinctive roofline and tower as a landmark of the Trinity garden Conservation Area have been at the forefront of pre-application discussion. The unsightly 1950's extension and the modest contribution of the dilapidated church hall to the significance of the listed church and its conservation area, all carefully debated upfront, confirmed and expanded on in the adopted conservation area appraisal and in the submitted heritage statement accompanying the application, have shown that there is an opportunity for repairing and decluttering the listed church from insensitive past alterations and to accommodate the evolving and expanding community use needs of the Church together with the opportunity to create much needed new residential development.	

	Once the principle of decluttering and redevelopment has been accepted from the planning and heritage conservation perspective, the development ambitions have been scaled down by embedding the necessary heritage impact testing throughout the design exploration process, by developing the proposed design not only on the context of the listed church, its immediate built and landscaped Conservation area setting and related views of the lusted building and views across and into this stretch of Conservation area, but also considering how the proposed development could respond and complement the urban character of the Braemar Avenue defined by its historic terraces adjoining the southern elevation of the Site. Both the proposed plan form, scale, proportions, height, roofline, façade composition, pattern of fenestration, façade treatment and materials of the proposed development have been designed within context, progressively drawing upon the established and distinctive geometries and features of the historic terraced houses on Braemar Avenue while aiming to design an honestly contemporary new building that has been visually tested for impact throughout its design evolution. The proposed repairs to the main church and removal of the unsightly 1950's extension to south elevation is a positive element of the proposed scheme and are very welcome. The impact of the new building and the need to link to the listed church has been explored and mitigated by design at pre-application stage in full light of the planning and heritage constraints and opportunities posed by the existing site configuration, whose southern part is already developed with the 1950s extension and the church hall. It has been acknowledged that the proposed footprint and scale of the proposed development building would exceed the footprint of the existing buildings and this has led to maximise the opportunity to develop the basement level, while steeping back the above ground plan form to be subordinate to the building line of the listed church and by breaking down and stepping back the above ground height and mass so to mediate between the scale and height of the listed church and the adjacent two storey terraced houses south of the church, just outside the conservation area boundary. The top floor of the proposed building has undergone various design testing and configurations and has been finally set back from all elevations further consistent visual testing in the setting of the listed building and its conservation area views aiming to successfully respect and retain both the full legibility, architectural and visual primacy of the listed building. The proposed building's western elevation has been brought forward and aligned to the building line of the terraced houses south of the listed building to respond to the different relationship with and heritage importance of the built context.	

	The ground floor link between the church and the new development has been sensitively designed as a lightweight, transparent, contemporary structure well set back form the main elevation of the church. All of the above design measures, as also proved in the accompanying visual testing, have successfully mitigated the potentially negative impact of the proposed development on the setting of the listed church and its conservation area character. The scheme so far achieved is a context-led, well-pondered, carefully designed, low impact response to a challenging heritage site. Further design refinement at detailed design stage can add to the design quality and contribute to raise the architectural quality of the area. The proposed repairs to the main church and demolition of the 1950's extension will enhance the character of the church as a focal building within the conservation area will have a positive impact on the character of the listed building and are fully supported. The loss of the corrugated iron church hall is considered to have a very low negative impact on the character and appearance of the conservation area but promises to deliver substantial public benefits as explained in the application. The proposed new building and related link will undoubtedly introduce unprecedented built form, scale, height and architectural language in the setting of the listed building and on this edge of the Conservation Area and will obscure the original scale and spatial relationship between the historic buildings on the listed site. However, by virtue of its careful design, forms, articulation of masses and heights the new building will preserve the architectural quality and visual primacy of the listed church in views of the conservation area, and while the built and visual setting of the listed building will change, the intrinsic qualities and the ability to appreciate the repaired and enhanced listed church within its conservation area environment will stay. It is possible to conclude that the overall impact of the proposed scheme would lead to a very low level of less than substantial harm to the significance of the listed building within its conservation area and test outlined in paragraph 202 of the NPPF should apply. Detailed design, material specification and method statements related to demolitions, repair works to the listed church and construction of proposed basement level and ground floor link should be submitted for approval to the planning authority before commencement of the relevant works. Additional comments dated 26/10/2023	

	The Conservation Officer advises that the tin tabernacle is their opinion curtilage listed, it pre-dates the listed church, but was ancillary to its construction and subsequent church functions and has been standing on the site in the same ownership as the church. However, the intrinsic designed value of the tin tabernacle is low, as not only its fabric is in a decayed state, not only the building suffers from evident structural issues (''*Structurally the building is in a significant state of disrepair, with visible bulging of the elevations, timber window degradation, iron corrosion and broken windowpanes.") ,* but all the architectural features that contributed to the architectural quality of the former church hall have been lost (*'' the building has lost much of its detailing over time. Lost detailing includes timber finials to the gabled roof apex on the front elevation, arched ecclesiastical panes to the upper section of each window, small gabled dormers in the roof slope and marginally more shaped bargeboards*.'') and this is articulated both in the heritage statement quoted above and in the planning statement. As per the heritage statement, and I concur with its findings: ''*The predominant significance of the hall lies in its historical value and former historical relationship with the church, through its demolition there would be harm to this relatively minor aspect of the significance of the listed building."* We are here dealing with a derelict, unsafe, historic building of limited significance, which is mostly related to its historic value stemming from its association with the listed church; this building has been totally deprived of its modest original architectural quality and character, it cannot be used and even when expensively refurbished it would not meet the increased operational needs of the church which ensure the continued beneficial use of the listed church building. Additionally, the adopted CA character appraisal stresses that the tin tabernacle *''has a rustic appearance, and makes a limited contribution to the streetscene."*	
Transportation	**Description** An application has been received seeking planning permission to demolish the existing Church Hall at the rear and redevelop the site to provide a four-storey building which will contain 15 residential dwellings, a basement church hall, and associated ground facilities. The development would provide cycle parking based on the proposed use class. The residential cycle provision would be 26 long-stay cycle spaces, 2 short stay and church cycle provision would be 4 long-stay and 7 short-stay. The basement church hall and the residential development will have separate entrances for pedestrians. The site is located at the beginning of a cul-de-sac. The submitted Transport Statement includes a proposal to introduce 2 on-street car parking spaces and convert 1 on-street space to a disabled bay. The location site currently has a single vehicle	Observations have been taken into account. The recommended legal agreement clauses and conditions attached.

	crossover which is not in use. The proposal includes the reinstatement of the footway as part of the development. The site is located within the Wood Green Outer CPZ, which restricts parking to permit holders only Monday to Saturday, 0800 – 1830. The proposal site has PTAL rating of 6a indicating that its access to public transport is very good when compared to London as a whole suggesting that there are opportunities for trips to be made to and from the site by modes other than the private car. The proposal site has convenient access to local shops, services, facilities and transport links. Alexandra Palace Station is only a c.6min walk and c.2min bike ride from the development. Furthermore, Wood Green Underground station is easily accessible from the site with it only being approximately: 10min bus ride, 10min walk, and 4min bike ride. **Unit mix** Proposed: 7 x 1 bedroom, 5 x 2 bedroom, and 3 x 3 bedroom dwellings. **Car parking** Planning policy requires that applications for planning permission be determined in accordance with the development plan unless material considerations indicate otherwise. The published London Plan 2021 Policy T6.1 Residential Parking requires that development proposals must comply with the relevant parking standards. For a development of this type, a 7 x 1 bedroom, 5 x 2 bedroom, and 3 x 3 bedroom dwellings with a PTAL ranking of 6a, the maximum number of car parking spaces permitted would be car-free, this is further supported by the by Haringey Development Management DPD, Policy DM32 which supports car-free developments. Therefore, the development is in accordance with this policy. The proposal includes the additional provision of 2 on-street car parking spaces on Braemar Avenue. However, as this would be a car free development with the residents not being able to attain a parking permit, therefore there would be no need to increase on-street parking bays as no new demand will be generated from the development. This is further supported by the local CPZ, which restricts parking to permit holders only for 6 days of the week and for the majority of the day. The London Plan 2021 T6.1 Residential Parking states that disabled person's parking should be provided for new residential developments delivering 10 or more units. As a minimum 3% of dwellings must have at least 1 designated disabled persons parking bay from the outset. This Policy further requires that new developments be able to demonstrate as part of a Parking Design and Management Plan, how an additional 7% of dwellings could be provided with 1 designated disabled person's parking space per dwelling in future upon request as soon as the existing provision is insufficient. However, the Highway Authority would require that the 10% be provided from the outset, which means that the development would need to make provision	

	for 2 blue badge/accessible parking spaces. Additionally, all disabled bays associated with the development must be for resident use only. **Car clubs** As per the pre-application advice, the Highway Authority would require the applicant to enter a S106 agreement with Haringey Council to provide car club facilities for potential occupants of the development to use. This would assist with reducing the rate of car ownership from residents of this development and help to offset any potential parking impacts. The developer has provided information on the location of nearby car club sites, with the closest being on Finsbury Road approximately 6min from the site. However, the Highway Authority would require the applicant to liaise with local car club operators who will advise on the local coverage and whether the applicant should be funding any new bays/cars in the locality to meet future car club demand from the development. The applicant will be required to provide 3 years car club membership for each residential unit, along with £50 driving credit, which has been already stated within the submitted Transport Statement for this site. **Cycle parking** The development would see the provision of 26 long-stay and 2 short-stay for the residential development and 4 long-stay and 7 short-stay for the church. Long-stay cycle parking for residents will be located both on the basement and ground levels. For a development of this type to comply with the London Plan Policy T5 Cycle, the church cycle parking provision would need to be based upon the following: long-stay: 1 space per 8 FTE staff and short-stay: 1 space per 100 sqm (GEA). However, cycle parking has been based upon proposed and existing GEA sqm, with no information being provided on the staff levels. Consequently, this makes determining if cycle levels meet policy requirements impossible and if proposed levels meet policy. It can be seen from the submitted plans that 8 of the residential long-stay bikes are located within gardens on the ground floor, with 2 of the cycle parking spaces only being accessible from within the dwelling. Consequently, the Highway Authority finds their location to be unsatisfactory, as residents would be forced to proceed through the dwelling to retrieve/store the bikes. This would deter their intended use, making them not fit for purpose. Furthermore, no exact information has been provided on the type of secure shelters for the garden cycle parking and how the basement level parking will be secured for residents, especially considering this will be used as an emergency route for the church. Therefore, the development is not in accordance with the published London Plan 2021 Policy T5 Cycle, which requires developments to '*provide the provision of appropriate levels of cycle parking which should be fit for purpose, secure and well-located and be in accordance with the minimum standards'*. These issues can be addressed with a pre-commencement planning condition requiring the applicant to submit details of	

	cycle parking in line with the London Plan and the London Cycle Design Standards (LCDS) which must be submitted and approved before development commences on site. **Highway works** As mentioned above, the development will see the reinstatement of the footway where the vehicle crossover has now become redundant on Braemar Avenue. This will enable safer crossing and traversal by pedestrians, especially for those with mobility issues. This is to be in accordance with the published London Plan 2021 Policy T4 Assessing and mitigating transport impacts, which states that '*development proposals should not include increase road danger'*. This is further supported by the Haringey Council's Development Management DPD Policy DM33 which states that the council will only support proposal for a new crossover where it does not result in a '*reduction in pedestrian or highway safety'.* The Highway Authority will require all the required improvements to the highway be secured and implemented through a S278 agreement. **Travel plan** The Highway Authority has reviewed the submitted Travel Plan for the church and finds it to follow standardised travel plan frameworks and accepts it. However, there will be a requirement for the Council to monitor the travel plan. This can be addressed with a planning obligation requiring monitoring of the travel plan over a 5-year period. **Trip generation** Trip generation for the proposal has been submitted as part of the Transport Statement. Trip generation has been provided for both church and residential use classes. The proposed church hall will have seating capacity for 97, it is envisaged that the hall will be used for both a Sunday school and occasional events. The Highway Authority believes that with the measures identified in the Travel Plan, the sites excellent PTAL, and extensive parking measures that no negative car trips are likely to be experienced. The residential trip data has been gathered from TRICS sites, based upon the following criteria suburban areas, PTAL 4 or higher, and weekdays. Considering the car free nature of the development and that residents would not be permitted from gaining a parking permit, it is felt by the Highway Authority that no detrimental car trip will be experienced, and that existing public transport infrastructure should be able to absorb any additional trips. **Service and Delivery** No Service and Delivery plan has been received as part of this proposal. However, some information has bene received within the Transport Statement pertaining to servicing of both the church and residential developments. It states that deliveries for the church will remain as present and that up to 2 deliveries per day would be expected for the residential development. Although, a much higher number of deliveries could	

	be expected over a day for the residential development as much shopping is currently done online. Therefore, the Highway Authority would require the applicant to submit a Service and Delivery Plan, which must be secured by way of a planning condition. **Refuse collection** The residential refuse and recycling can be accessed via a courtyard, which is located 11m into the development. This exceeds the maximum walking distance of 10m that is allotted for larger refuse bins from the collection point to the highway by the council's refuse operatives. This issue can be addressed as part of the service and delivery planning condition. **Construction and Logistics** An outlined Construction and Logistics Plan has been submitted as part of this proposal. Part of the plan makes reference to 4.3m of parking bays needing to be suspended for deliveries to the site and further entails the relocation of the on-street cycle hanger. For any changes to the Traffic Order or the suspension of any parking bays, the applicant will need to liaise with Haringey Council's Highways Team. These deliveries will take place between the hours of 09:45-14:15, which will be outside of the peak time and are done in a bid to avoid the School Streets scheme on Trinity Road. Swept path drawings have been supplied for a 10.3m vehicle, which will be the largest vehicle to service the site. Furthermore, most vehicles to visit the site will be over 7.5 tonnes. It is unclear from the swept path drawings on how a vehicle will be able to turn around on Braemar Avenue and proceed back onto Bounds Green Road. The drawings that have been supplied demonstrate the same manoeuvre, which is meant to illustrate both forward and reversing manoeuvres. Furthermore, it displays a vehicle turning onto Braemar Avenue on the wrong side of the road, which presents a severe risk to road safety. This is not in accordance with the published London Plan 2021 Policy T4 Assessing and mitigating transport impacts which states that '*development proposals should not include increase road danger'*. The Highway Authority would require that a Construction Logistics Plan (CLP) be submitted by the developer/applicant, this can be secured via a planning obligation. The developer/applicant will need to adhere to Transport for London's guidance when compiling the documents, construction activity should also be planned to avoid the critical school drop off and collection periods, the applicant will be required to pay a construction travel plan contribution of five thousand pounds (£5,000) for the monitoring of the construction activities on site. **Recommendation** There are no highway objections to this proposal subject to the following planning conditions and s.106 obligations.	

	Conditions 1. Delivery and Servicing Plan and Waste Management The owner 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 service and deliver plan must also include a waste management plan which includes details of how refuse is to be collected from the site, the plan should be prepared in line with the requirements of the Council's waste management service which must ensure that all bins are within 10 metres carrying distances of a refuse truck on a waste collection day. Reason: To ensure that the development does not prejudice the free flow of traffic or public safety along the neighbouring highway. 2. Cycle Parking The applicant will be required to submit to the Highway Authority plans showing accessible; sheltered, and secure cycle parking for 26 long-stay residential cycle spaces, with 2 residential long-stay spaces being located in a more accessible location for approval. REASON to be in accordance with the published London Plan 2021 Policy T5, the cycle parking must be in line with the London Cycle Design Standards (LCDS). Reason: To ensure that cycle parking is provided in line with the London Plan 2021 and the London Cycle Design Standard (LCDS). 3. Event Management Plan The applicant will be required to provide an event management plan/ local area management plan which includes the following information: a) Crowd management and dispersal including Stewarding. b) Travel Demand Management Plan in line with the Travel Plan which promotes travel by sustainable modes of transport to reducing travel by car and local car parking demand. c) Signage strategy to local transport interchange d) Taxi collection strategy including drop off and collection. Reason: To enable visitors to consider sustainable transport options, as part of the measures to limit any net increase in travel movements by car. **S.106 Obligations** 1. Construction Logistics and Management Plan	

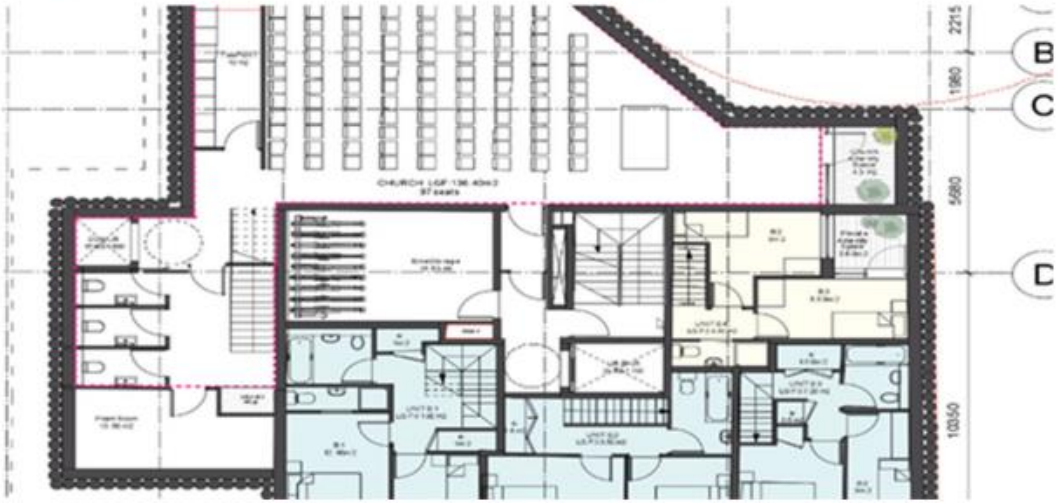
	The applicant/developer is required to submit a Construction Logistics and Management Plan, 6 months (six months) prior to the commencement of development, and approved in writing by the local planning authority. The applicant will be required to contribute, by way of a Section 106 agreement, a sum of £5,000 (five 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. d) Details of measures to protect pedestrians and other highway users from construction activities on the highway. e) The undertaking of a highway dilapidation survey. f) The implementation of the Construction Logistics and Community Safety (CLOCS) standard. 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 the amenity of neighbouring properties and to maintain traffic safety. <u>2. Car-Free Agreement</u> 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 be in accordance with the published London Plan Policy T6.1 Residential Parking, and 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 <u>3. Car Club Membership</u>	

	The applicant will be required to enter into a Section 106 Agreement to establish a car club scheme, which includes the provision of three years' free membership for all residents and £50 (fifty pounds in credit) per year/per unit for the first 3 years. Reason: To enable residential occupiers to consider sustainable transport options, as part of the measures to limit any net increase in travel movements. <u>4. Residential Travel Plan</u> 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. c) The applicants are required to pay a sum of, £2,000 (two thousand pounds) for five years £10,000 (ten 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. <u>5. Church Hall Travel Plan</u> A Church Hall travel plan must be secured by the S.106 agreement. As part of the travel plan, the following measures must be included in order to maximise the use of public transport. a) The applicant submits a Church Hall Travel Plan for the commercial aspect of the Development. b) and appoints a travel plan coordinator who must work in collaboration with the Facility Management Team to monitor the travel plan initiatives annually for a period of 5 years and must include the following measures:	

	c) Provision of commercial induction packs containing public transport and cycling/walking information, available bus/rail/tube services, map and timetables to all new staff, travel pack to be approved by the Councils transportation planning team. d) The applicant will be required to provide, showers lockers and changing room facility for the Church Hall element of the development. e) The developer is required to pay a sum of £2,000 (two thousand pounds) per year per travel plan for monitoring of the travel plan for a period of 5 years. This must be secured by S.106 agreement. Reason: To promote travel by sustainable modes of transport in line with the London Plan and the Council's Local Plan SP7 and the Development Management DMPD Policy DM 32. <u>6. Highway Improvements</u> The owner shall be required to enter into agreement with the Highway Authority under Section 278 of the Highways Act to pay for any necessary highway works, which includes if required, but not limited to, footway improvement works, access to the Highway, measures for street furniture relocation, carriageway markings, and access and visibility safety requirements. Unavoidable works required to be undertaken by Statutory Services will not be included in the Highway Works Estimate or Payment. The developer will be required to provide details of any temporary highways scheme required to enable the occupation of each phase of the development, which will have to be costed and implemented independently. The works include but are not limited to the removal of the crossover to the site to reinstate the footway and the creation of any on-street disabled car parking bays which will require electrification. Reason: To implement the proposed highways works to facilitate future access to the development site.	
Waste Management	Comments dated 27/01/2023 According to the Haringey planning guidance waste and recycling storage requirements are advised at 1 x 1,100L recycling bin per 10 households and 1 x 1,100L waste bin per 6 households. For this development, the waste storage bin capacity has been rounded down as there are 15 households but only 2 x 1,100L refuse bins but the recycling has over capacity with 2 bins for 15 dwellings. The total	Comments noted

	storage allocated is adequate but the developer may want to review the storage ratio between the waste and recycling. Also for note is that food waste can only be serviced in 140 litre containers not 360 litre as mentioned in the guidance. Comments dated 30/08/2023 Thank you for the update and confirming the waste and recycling containment arrangements which now comply with our guidance.	
Building Control	I have reviewed the Basement Impact Assessment and can confirm that it meets your requirements Comments dated 12/10/2023 I have looked at the fire strategy report and plans submitted and have the following comments; The plans and details will be subject to a full check under the Building Regulations when the application is submitted to Building Control, however the following initial fire safety issues have been raised; 1. Inward opening escape doors serving the church area within the new lower ground floor level, are unacceptable. 2. Lobby protection not show between the ground floor residential refuse area and the escape route serving the upper floors. 3. Inner rooms within the flats on the lower and upper levels do not comply with the guidance in AD B or BS 9991. Further justification required to accept proposed layout. 4. Fire fighting access not demonstrated to comply with Requirement B5 of the Regulations. Dry riser required if 45m hose length route is not shown to comply with Approved Document B. Firefighting provision to the church extension to also be considered. Comments dated 26/10/2023 Further to your e-mail and the earlier responses, it is clear that Approved Inspectors will be used to check for Building Control compliance, however the following fire safety queries have still not been addressed.	Comments noted. Details of a more detailed fire strategy/fire engineered design is secured via condition

	1. Inward opening escape final escape doors from the primary and secondary escape routes, serving the church areas are unacceptable for the numbers proposed. 2. The inner rooms issue to the flats on the 3rd floor has not been addressed. 3. Its is not clear whether the alternative escape route, from the lightwell in the lower ground floor flat, leads to a place of safety.	
Trees	Comment dated 10/05/2023 Both the revised encroachments within the RPAs are minimal and non-existent and as such along with the standard TPP, AMS conditions are acceptable. Comment dated 27/10/2023 T11 B category is a multi-stemmed Ash tree with tight included forks growing into the fence line. The crown is sparse and is cited with ash die back. This Ash tree is taller than T13 when viewed from Nightingale park. T13 B- category is heavily covered in ivy (making inspection of the base hard) and the crown line is below T11. There are actually two trees here, in proximity, that make the one crown when viewed from a distance. This tree has also been cited with ash die back. The crown has been affected by the surrounding trees and is not a symmetrical open crown growth shape. T11 has been classed as the slightly better tree, has a fuller crown and I concur. The loss of T13 will not have a significant impact on the line of mature trees in this area. However, our largest trees are our biggest assets. The mitigating proposed re planting for the loss of T13 will require a good urban fitness tree, overall canopy gain, and aftercare to establish independence within the landscape. Three trees should be planted for the loss. These trees should reach 20- 40m at maturity and have all round year interest. Corsican or Black Pine trees grouped would be a good choice.	Comment noted. Conditions included

Public Health	**Sent:** 18 October 2023 18:31 **Subject:** RE: Braemar Avenue Baptist Church, Braemar Avenue, Wood Green, London, N22 7BY - HGY/2022/4552 Hi Valerie, Apologies for the delay! All our potential queries have been answered by the applicants responses. *The applicants response is below* 1. *The drawing plans show a door between a church hall and residential communal area. We would like clarity on the access point between the church hall and residential units will be used for.* *This door provides a means of escape only. It will be secure and not used for any other purpose.* 2. *Unit 0.4 is close to the church and could impact noise levels affecting the resident's health and wellbeing. We would like the noise management plan to address this as this may be a concern.* *We agree to a noise management condition to secure the management plan.* 3. *We would like to know whether the cycle storage is being shared between the church community and residents.* *The cycle store in the basement serves the residential units only.*  	Comment noted

Surface and flood water	Comments dated 24/02/2023 Having reviewed the applicant's submitted Flood Risk Assessment report reference number 2220367-EWP-ZZ-XX-RP-C-0001 Revision P2 along with Sustainable Drainage Strategy Document 2220367-EWP-ZZ-XX-RP-C-0002, Revision P2 as prepared by Elliott Wood Consultant, we have following observations to make: 1) As a part of full application, source control outputs are not acceptable. Therefore, full calculations will be required including full range of rainfall data for each return period provided by Micro drainage modelling or similar simulating storms through the drainage system, with results of critical storms, demonstrating that there is no surcharging of the system for the 1 in 1 year storm, no flooding of the site for 1 in 30 year storm and that any above ground flooding for 1 in 100 year storm is limited to areas designated and safe to flood, away from sensitive infrastructure or buildings. These storms should also include an allowance for climate change. 2) For the calculations above, we request that the applicant utilises more up to date FEH rainfall datasets rather than usage of FSR rainfall method. 3) Any overland flows as generated by the scheme will need to be directed to follow the path that overland flows currently follow. A diagrammatic indication of these routes on plan demonstrating that these flow paths would not pose a risk to properties and vulnerable development Comments dated 08/09/2023 Having reviewed the submitted Flood Risk Assessment and Drainage Strategy Report (Doc. Ref. 2220367-EWP-ZZ-XXRP-C-0002 -P2), dated 16/12/22 in conjunction with the Technical Addendum Note (Doc. Ref. 2220367-EWP-ZZ-XXTN-C-0001), prepared by elliottwood Partnership Ltd dated 18th April 2023, we have no further comments to make on the this application. We are content that the impact of surface water drainage has been addressed appropriately	Comment noted
Carbon Management	**Carbon Management Response 25/08/2023** In preparing this consultation response, we have reviewed: • Energy Statement prepared by Energylab Consulting Ltd. (dated 21 Dec 2022)	Observations have been taken into account. Conditions and clauses in 106 recommended

- Sustainable Design and Construction Statement prepared by Energylab Consulting Ltd. (dated 21 Dec 2022)
- Urban Greening Factor Calculation
- Other relevant supporting documents.

1. Summary

The development achieves a reduction of 64% carbon dioxide emissions on site, which is supported in principle. However, Carbon Management cannot currently support this application as the development fails to demonstrate carbon reduction for both residential and non-residential uses separately and the baseline heating strategy for both uses is not clear. The development does not currently meet London Plan Policy SI2 and Local Plan SP4: 20% carbon dioxide emission reduction from on-site renewable energy generation as well as the London Plan Policy SI4 and Local Plan DM21: insufficient dynamic thermal modelling was undertaken to adequately assess the overheating risk throughout the development, mitigate the risk and reduce the impact on the urban heat island.

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

2. Energy Strategy

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

The overall predicted reduction in CO_2 emissions for the development shows an improvement of approximately 64% in carbon emissions with SAP10 carbon factors, from the Baseline development model (which is Part L 2021 compliant). This represents an annual saving of approximately 7.86 tonnes of CO_2 from a baseline of 12.33 tCO_2/year.

London Plan Policy SI2 requires major development proposals to calculate and minimise unregulated carbon emissions, not covered by Building Regulations.

Site-wide (SAP10 emission factors)			
	Total regulated emissions (Tonnes CO_2 / year)	**CO_2 savings (Tonnes CO_2 / year)**	**Percentage savings (%)**

Part L 2021 baseline	12.33		
Be Lean	11.15	1.18	10%
Be Clean	6.14	5.01	41%
Be Green	4.47	1.67	13%
Cumulative savings		7.86	64%
Carbon shortfall to offset (tCO_2)	4.47		
Carbon offset contribution	£95 x 30 years x 4.47 tCO_2/year = £12,739.5		
10% management fee	£1,273.95		

Actions:

- Please submit the GLA's Carbon Emission Reporting Spreadsheet.
- Please provide the carbon reduction summary tables for both residential and non-residential part of the development. Also, report the unregulated emissions.
- Summary tables should be provided alongside bar graphs as per Tables 3, 5, 6 & 7 in section 6 of the GLA guidance (although this should split out by outline and detailed, and residential and non-residential uses).
  https://www.london.gov.uk/sites/default/files/gla_energy_assessment_guidance_april_2020.pdf
- Please submit SAP and BRUKL sheets for a representative selection of the development for the Baseline, Be Lean and Be Green scenarios.
- What is the calculated Primary Energy Factor?

Energy Use Intensity / Space Heating Demand

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

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

Actions:

- What is the calculated Energy Use Intensity (excluding renewable energy)? How does this perform against GLA benchmarks, i.e. at 35 and 55 kWh/m2/year for residential and non-residential respectively? Please submit the information in line with the GLA's reporting template.
- What is the calculated space heating demand? How does this perform against the GLA benchmark of 15 kWh/m2/year? Please submit the information in line with the GLA's reporting template.

Energy – Lean

The applicant has proposed a saving of 1.18 tCO_2 in carbon emissions (10 %) site-wide through improved energy efficiency standards in key elements of the build, based on SAP10 carbon factors.

The development needs to demonstrate that energy efficiency measures alone will reduce regulated carbon emissions for residential uses by 10% and for non-residential uses by 15% against Part L 2021. The development must demonstrate this target has been achieved for residential and non-residential uses separately.

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

Floor u-value	0.10 W/m^{2}K
External wall u-value	0.14 W/m^{2}K
Roof u-value	0.11 W/m^{2}K
Door u-value	1.00 W/m^{2}K
Window u-value	1.00 W/m^{2}K
G-value	0.35
Air permeability rate	3 m^3/hm^2 @ 50Pa
Ventilation strategy	Mechanical ventilation with heat recovery (MVHR 90% efficiency;
Thermal bridging	Accredited Construction Details
Low energy lighting	100%
Thermal mass	Medium

Improvement from the target fabric energy efficiency (TFEE)	-8% improvement, from 28.11 to 30.54 kWh/m^2	

Actions:

- Please specify the heating strategy and ventilation system assumed under the Baseline and Be Lean scenarios (including the gross efficiency figure(s)). For residential applications the baseline should be a gas boiler. For non-residential applications the baseline should align with the proposed heating system, i.e. if proposing an air source heat pump, this should be specified with the efficiency values set out in Part L 2021 for that system under Be Lean.
- 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.
- Model the energy demand for the active cooling. Then include these energy demands into the carbon footprint of the development and update any offsetting requirements based on this.

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

Energy – Green

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 1.67 tCO_2 (13%) reduction of emissions are proposed under Be Green measures for the domestic part of the development.

	The solar array peak output is proposed to be 12.7kWp, which is estimated to produce around 11,277kWh/year of renewable electricity per year equivalent to a reduction of 1.67 tCO_2/year. The array of 38/40 panels (would be mounted on a roof area of 62 m^2, at a 5° angle, facing south. Actions: - Have you assessed the overshadowing of the tree canopy existing at the south-east corner of the development? - Has your feasibility shown the other roof above the church entrance hall will not be viable? - How will the solar energy be used on site (before surplus is exported onto the grid)? - Please provide a cost comparison (capital, operational and carbon cost) between the use of electric boiler and Air-source heat pumps. - It is recommended to make use of ASHP that can further reduce the on-site emissions and the running cost of heating than electric boiler. **Energy – Be Seen** London Plan Policy SI2 requests all developments to 'be seen', to monitor, verify and report on energy performance. The GLA requires all major development proposals to report on their modelled and measured operational energy performance. This will improve transparency on energy usage on sites, reduce the performance gap between modelled and measured energy use, and provide the applicant, building managers and occupants clarity on the performance of the building, equipment and renewable energy technologies. The applicant should install metering equipment on site, with sub-metering by dwelling and non-residential unit. A public display of energy usage and generation should also be provided in the main entrance area to raise awareness of residents/businesses. - Please confirm that sub-metering will be implemented for residential and non-residential units. - What are the unregulated emissions and proposed demand-side response to reducing energy: smart grids, smart meters, battery storage? - Demonstrate that the planning stage energy performance data has been submitted to the GLA webform for this development: (https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance/be-seen-energy-monitoring-guidance/be-seen-planning-stage-webform)	

3. Carbon Offset Contribution

A carbon shortfall of 4.47 tCO_2/year remains. The remaining carbon emissions will need to be offset at £95/tCO_2 over 30 years.

4. Overheating

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

In accordance with the Energy Assessment Guidance, the applicant has undertaken a dynamic thermal modelling assessment in line with CIBSE TM59 with TM49 weather files, and the cooling hierarchy has been followed in the design. The report has modelled 26 habitable rooms, 16 homes/spaces and 0 corridors.

The noise impact assessment reports an average noise level of 44dB during sleep hours in the proposed spaces which is higher than the 40dB limit. Due to this TM59 criteria for predominantly mechanically ventilated dwellings apply (assuming windows need to remain closed).

The assessment has reported the results of Model A and Model B.

Model A utilises solely passive measures with natural ventilation. All windows were modelled to open with 15% free area when temperatures exceeded 22°C.

Model B utilises continuous mechanical ventilation with heat recovery (MVHR). This allows for stale air to be extracted from spaces when humidity and temperature rise above a certain threshold, whilst supplying fresh air to the occupied spaces. Mitigation measure suggests active cooling which is not supported.

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 spaces pass TM52**	**Number of corridors pass**

Model A: DSY1 2020s	29/42	20/26	20/26	3/16	0/0
Model A: DSY1 2020s	36/42	21/26	21/26	15/16	0/0

For Model A, predominantly naturally ventilated rooms, 29 out of 42 rooms pass the overheating requirements for 2020s DSY1. In order to pass this, the following measures will be built:

- Natural ventilation, All windows to open 15% free area
- Glazing g-value of 0.35
- MVHR with summer bypass (XX l/s)

For Model B, predominantly mechanical ventilated rooms, 36 out of 42 rooms pass the overheating requirements for 2020s DSY1. In order to pass this, the following measures will be built:

- Glazing g-value of 0.35
- MVHR with 0.15 air changes per hour (ACH)
- Comfort cooling

Proposed future mitigation measures include:

- Active cooling

<u>Overheating Actions:</u>

- It is unclear which weather file is used for the assessment. Redo the overheating modelling with the Central London weather file for both residential and non-residential part of the development, which will more accurately represent the urban heat island effect following the guidelines as per the Haringey's Key Overheating Planning Application Requirements.
- Please perform the overheating assessment following the London Plan's cooling hierarchy and report results setting out the baseline scenario and additional modelled scenarios to test mitigation measure(s) required to pass the overheating assessment:
    - Baseline Scenario
    - Baseline Scenario + mitigation measure 1 i.e external shading
    - Baseline scenario + mitigation measure 1 + mitigation measure 2, etc
- Demonstrate the cooling hierarchy has been followed, and specify which overheating mitigation measures are proposed to reduce the overheating risk within the proposed design:
    - Internal heat generation, i.e. heat distribution infrastructure
    - Heat entering building, i.e. shutters, trees, vegetation, blinds

	o Manage heat through thermal mass and high ceilings o Passive ventilation, i.e. openable windows, shallow floorplates, dual aspect, stack effect o Mechanical ventilation, i.e. free cooling from outside air in shade, by-pass for summer mode - 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. - Specify the shading strategy, including technical specification and images of the proposed shading feature (e.g. overhangs, Brise Soleil, external shutters), elevations and sections showing where these measures are proposed. Internal blinds cannot be used to pass the weather files but can form part of the delivered strategy to reduce overheating risk for occupants (as long as it does not compromise any ventilation requirements). - Include images indicating which sample dwellings were modelled and floorplans showing the modelled internal layout of dwellings. - Undertake further modelling: o Model the 2020s DSY 2 and 3 and DSY1 for the 2050s and 20280s. Ensure the design has incorporated as many mitigation measures to pass these more extreme and future weather files as far as feasible. Any remaining overheating risk should inform the future retrofit plan. o All single-aspect rooms facing west, east, and south; o At least 50% of rooms on the top floor; o 75% of all modelled rooms facing South or South/West; o Rooms closest to any significant noise and / or air pollution source, with windows closed at all times (with cross reference to the Noise and the Air Quality Assessments to demonstrate the most sensitive receptors and the AVO Residential Design Guide); o Habitable communal spaces (e.g. communal living/dining rooms in care homes); o Communal corridors, where pipework runs through; o Commercial/office areas, particularly where they will be occupied for a longer period of time. Assuming that active cooling will be provided is not sufficient. If the proposed uses are not yet clear, this aspect can be conditioned to ensure that the modelling is based on the potential future occupiers.; - Specify the active cooling demand (space cooling, not energy used) on an area-weighted average in MJ/m^2 and MY/year? Please also confirm the efficiency of the equipment, whether the air is sourced from the coolest point / any renewable sources. - 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. - 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. - 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). - 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 design and construction report sets out the proposed measures to improve the sustainability of the scheme, including transport, health and wellbeing, materials and waste, water consumption, flood risk and drainage, biodiversity, climate resilience, energy and CO2 emissions and landscape design. A SuDs system has been considered and proposed for the development, specifying water butts to harvest rainwater from the domestic roof area. This water will then be utilised for gardening purposes within the proposed amenity spaces. All site waste is proposed to be collected by a licensed waste carrier and to be taken to a registered waste transfer station for sorting and recycling and reuse. A Site Waste Management Plan (SWMP) is proposed to be implemented to encourage the principles of the waste hierarchy which are to reduce, reuse and recycle waste. <u>Action:</u> - Set out what urban greening and biodiversity enhancement measures will be proposed (e.g. green infrastructure, bird boxes, bat boxes etc to connect to the green spaces around the site, living roofs, living walls, etc.) - A target (%) for responsible sourced, low-impact materials used during construction. - 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 0.4, which complies with the interim minimum target of 0.4 for predominantly residential developments in London Plan Policy G5. <u>Action:</u> - Please provide the biodiversity net-gain calculation. ***Living roofs*** All development sites must incorporate urban greening within their fundamental design, in line with London Plan Policy G5. The development is proposing living roofs in the development. All landscaping proposals and living roofs should stimulate a variety of planting species. Mat-based, sedum systems are discouraged as they retain less rainfall and deliver limited biodiversity advantages. The growing medium for extensive roofs must be 120-150mm deep, and at least 250mm deep for intensive roofs (these are often roof-level amenity spaces) to ensure most plant species can establish and thrive and can withstand periods of drought. Living walls should be rooted in the ground with sufficient substrate depth. Living roofs are supported in principle, subject to detailed design. Details for living roofs will need to be submitted as part of a planning condition. ***Non-Domestic BREEAM Requirement*** Policy SP4 requires all new non-residential developments to achieve a BREEAM rating 'Very Good' (or equivalent), although developments should aim to achieve 'Excellent' where achievable.	

	The applicant has not submitted a BREEAM Pre-Assessment Report for the non-residential part of the development. Although, the Sustainable design and construction statement addresses the required topics, the policy requires a quality assurance standard. Actions: - Submit the BREEAM Pre-Assessment report. - A table should be submitted to demonstrate which credits will be met, how many are met out of the total available, under which category, which could be achieved, and which will not be met. This needs to include justification where targets are not met or 'potential' credits (where they are available under the Shell and Core assessment). This will enable better assessment of which credits. **Carbon Management Response 12/10/2023** In preparing this consultation response, we have reviewed: • Energy Statement - Issue 3 prepared by Energylab Consulting Ltd. (dated 19 Sep 2023) • Sustainable Design and Construction Statement - Issue 2 prepared by Energylab Consulting Ltd. (dated 19 Sep 2023) • Overheating Risk Assessment Issue 2 – prepared by Energylab Consulting Ltd. (dated 19 Sep 2023) • Other relevant supporting documents. **1. Summary** The development achieves a reduction of 64% carbon dioxide emissions on site, which is supported in principle. However, Carbon Management cannot currently support this application as it is not clear how the non-residential part of the development complies to be zero carbon following the energy hierarchy in line with Policy SI 2 and Policy SP4. The development does not currently meet London Plan Policy SI2, Local Plan SP4, London Plan Policy SI4 and Local Plan DM21. Furthermore, Carbon Management cannot support the overheating straetgy of this application as it does not satisfactorily follow the Cooling Hierarchy or propose any retrofit plan for future overheating risk. Some further 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 Strategy

Policy SP4 and DM21 requires all new development to be net-zero carbon following the energy hierarchy and exceed the minimum carbon reduction requirements. The GLA Energy Assessment Guidance (Chapter 5.2, 6.2 p.11 & p.12) requires the results to be presented separately and demonstrate compliance with the energy hierarchy and the carbon targets for both residential and non-residential separately as set out in Policy SI 2 for residential uses, non-residential uses, and the entire site.

Site-wide (SAP10.2 emission factors)			
	Total regulated emissions (Tonnes CO_2 / year)	**CO_2 savings (Tonnes CO_2 / year)**	**Percentage savings (%)**
Part L 2021 baseline			
Be Lean			
Be Clean			
Be Green			
Cumulative savings			
Carbon shortfall to offset (tCO_2)			
Carbon offset contribution	£95 x 30 years x 30.30 tCO_2/year =		
10% management fee			
Total			

Residential (SAP10.2)			
	Total regulated emissions (Tonnes CO_2 / year)	**CO_2 savings (Tonnes CO_2 / year)**	**Percentage savings (%)**

Part L 2021 baseline	12.33		
Be Lean	11.15	1.18	10%
Be Clean	6.14	5.01	41%
Be Green	4.47	1.67	13%
Cumulative savings		7.86	64%
Carbon shortfall to offset (tCO_2)	4.47		

Non-residential (SAP10.2)			
	Total regulated emissions (Tonnes CO_2 / year)	**CO_2 savings (Tonnes CO_2 / year)**	**Percentage savings (%)**
Part L 2021 baseline	6.95		
Be Lean			
Be Clean			
Be Green			
Cumulative savings			
Carbon shortfall to offset (tCO_2)	6.28		

Actions:

- Please provide the carbon reduction summary tables for residential, non-residential, and site-wide of the development. Also, report the unregulated emissions.
- What is the calculated Primary Energy Factor?

Energy Use Intensity/Space Heating Demand

The EUI and space heating demand for residential part of the development is shared, while it is missing for the non-residential part.

Building type	EUI (kWh/m^2/year)	Space Heating Demand (kWh/m^2/year)	Methodology used
Residential	38.6	11.82	Part L1 - SAP 10.2 & none dwellings/& Landlord Circulation
Non-Residential	TBC	TBC	TBC

Actions:

- What is the calculated Energy Use Intensity (excluding renewable energy) for the non-residential use? How does this perform against GLA benchmarks, i.e. 55 kWh/m2/year?
- What is the calculated space heating demand? How does this perform against the GLA benchmark of 15 kWh/m2/year?

Energy – Lean

The carbon reduction for non-residential part of the development is missing.

The development needs to demonstrate that energy efficiency measures alone will reduce regulated carbon emissions for residential uses by 10% and for non-residential uses by 15% against Part L 2021. The GLA Energy Assessment Guidance (Chapter 6.2, p.12) requires the results to be presented separately for residential uses, non-residential uses, and the entire site, to demonstrate compliance with the energy hierarchy and the carbon targets as set out in Policy SI 2. The development must demonstrate this target has been achieved for residential and non-residential uses separately.

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

Air permeability rate	3 & 5 m^3/hm^2 @ 50Pa (ref. Be Lean SAP sheet)
Heating strategy (Be Lean only)	Gas Boiler with efficiency 66% and 92.4%
Improvement from the target fabric energy efficiency (TFEE)	8% improvement, from 30.48 to 28.14 kWh/m^2

Actions:

- Please provide the carbon reduction values under Be Lean for the non-residential part of the development and its compliance with the targets set in Policy SI2.

	- The air permeability of 3 and 5 are used for the Be Lean modelling which is not consistent. Similarly, the efficiency of the gas boiler used for Be Lean modelling is 66% and 92.4% which is also not consistent. Please amend this inconsistency for all the values. - 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. The applicant has requested this to be conditioned. However, it is recommended to plan this at an earlier stage if possible. Overheating is dealt with in more detail below. **Energy – Clean** No further comments. **Energy – Green** The applicant confirms the trees are below the proposed height of the building, and therefore will not obstruct the proposed PV panels. Also, due to the potential for significant overshading, panels are not proposed on top of the roof area above the church. The PV is proposed to serve all landlord and communal spaces and any additional energy production to be exported back to the grid. <u>Actions:</u> - Please provide a cost, embodied carbon comparison (capital, operational (for occupants) and carbon cost) between the use of electric boiler and air-source heat pumps (both individual and communal). Whilst the space heating demand for the residential dwellings is fairly low, using an electric heating solution should only be progressed where a quality-assured construction method and design delivers the low space heating demand as modelled. - Please set out how the existing church could be decarbonised as part of this application, or in the future. There is a good opportunity to include the decarbonisation of the main church within this development project, helping to reduce the church's carbon footprint and respond to the climate emergency. **Energy – Be Seen** The applicant has proposed installing monitoring devices for energy usage and PV arrays, like smart meters, to provide operational data. The metering equipment should be installed with sub-metering by dwelling and non-residential unit. A public display of energy usage and generation should also be provided in the main entrance area to raise awareness of residents/businesses.	

Actions:

- Please confirm that sub-metering will be implemented for residential and non-residential units.

3. Carbon Offset Contribution

A carbon shortfall of 4.47 tCO_2/year remains. The remaining carbon emissions will need to be offset at £95/tCO_2 over 30 years.

4. Overheating

The applicant has confirmed using the London Weather Centre files for the overheating assessment.

Residential

In accordance with the Energy Assessment Guidance, the applicant has undertaken a dynamic thermal modelling assessment in line with CIBSE TM59 with TM49 weather files, and the cooling hierarchy has been followed in the design. The report has modelled 26 habitable rooms, 16 homes and 0 corridors.

The noise impact assessment reports an average noise level of 44dB during sleep hours in the proposed spaces which is higher than the 40dB limit.

The assessment has reported the results of Model A, Model B and Model C. TM59 criteria for predominantly mechanically ventilated dwellings have been applied to the duplex ground/lower ground floor flats due to potential security risks associated with openable windows.

1. Model A utilises solely passive measures with natural ventilation. All windows were modelled to open with 15% free area when temperatures exceeded 22°C except the ground floor flats where TM59 criteria for predominantly mechanically ventilated rooms was applied.
2. Model B utilises the above passive measures with continuous mechanical ventilation with heat recovery (MVHR) with 0.15 air changes per hour (ACH).
3. Model C utilises the above measures with active cooling via a split-system for remaining high-risk spaces.

Results are listed in the table below.

	TM59 – criterion A	**TM59 – criterion B hours >26°C (pass <33 hours)**	**Number of habitable**	**Number of corridors pass**

	(<3% hours of overheating)		rooms pass TM59	
Model A: DSY1 2020s	25/42	15/26	15/26	Not modelled
Model B: DSY1 2020s	36/42	26/26	26/26	
Model C: DSY1 2020s	42/42	26/26	26/26	
Model C: DSY2 2020s	2/42	2/26	2/26	
Model C: DSY3 2020s	0/42	0/26	0/26	
DSY1 2050s	Not modelled			
DSY1 2080s	Not modelled			

Non-Residential
The applicant has also undertaken, a CIBSE TM52 Overheating Assessment for the proposed non-domestic church building. The assessment has been developed in line with the London Plan Cooling Hierarchy principles to mitigate overheating risk utilising a passive approach. Three models were assessed using the London Weather Centre files.

	Criteria 1 (%Hrs Top-Tmax>=1K)	Criteria 2 (Max. Daily Deg.Hrs)	Criteria 3 (Max. DeltaT)	Criteria failing
Model A: DSY1 2020s	1/3	0/3	2/3	1/3
Model B: DSY1 2020s	2/3	1/3	2/3	2/3
Model C: DSY1 2020s	3/3	3/3	3/3	3/3

<u>Overheating Actions:</u>

Mitigation measures

	- Please demonstrate the cooling hierarchy has been followed meaningfully by incorporating the installation of further passive measures, particularly solar shading (overhangs, external shutters, brise soleil) throughout the development. This is especially important for the top floor dwellings, south-facing window openings and single-aspect dwellings. - Specify the shading strategy, including technical specification and images of the proposed shading feature (e.g. overhangs, Brise Soleil, and external shutters). - Provide the elevations and sections plans to show where these measures are proposed. - Revise the ventilation strategy for the ground and lower ground floor dwellings, incorporating night-time natural ventilation with security features to meet the Part O requirements. Re-model those dwellings accordingly. - Specify the ventilation strategy, including floorplans showing which habitable spaces will be predominantly naturally ventilated or mechanically ventilated, specification of the proposed mechanical ventilation (efficiency and air changes), window opening areas. - Include images indicating which sample dwellings were modelled and floorplans showing the modelled internal layout of dwellings. - Confirm on an annotated plan within the statement which residential and non-residential spaces will require active cooling, after responding to the comments within this response. Include specification for the active cooling in the dwellings, if still required. Confirm whether the church reception will have active cooling. Future weather file modelling - The applicant has not modelled DSY 1 for the 2050s and 2080s. Please also model these and ensure the design has incorporated as many mitigation measures to pass these as feasible. Any remaining overheating risk should inform the future retrofit plan. - 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. Retrofit plan - Set out a retrofit plan for future and more extreme weather files, demonstrating how these measures can be installed at a later date within the proposed design, how they would reduce the	

	overheating risk, what their lifecycle replacement will be, and who will be responsible for overheating risk. - 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). - This development should have a building user guide to mitigate overheating risk for occupants. Please make sure the building user guide clearly mentions the windows can be opened 15^{o} if there are any noise issues during occupation, and opened further when there are no noise issues. **5. Sustainability** In addition to the sustainability proposals in the response above, the applicant has proposed to provide biodiversity enhancement measures such as: - New native hedgerows and trees (of local provenance) to be planted along plot/site boundaries, as specimen trees - Areas of the amenity grass within communal areas will be seeded with a species rich turf e.g. Wildflower Native Enriched Turf or Species Rich Lawn Turf to enhance diversity within the grassland sward (which will in turn attract insects, birds and bats) - The inclusion of green or brown roofs to enhance the biodiversity of the site post development. These roofs could be planted with species rich turf or alternatively different sized brown roof substrates and dead wood habitat which can also be planted with sedum Species. The following targets for circular economy have been proposed: - 100% reuse of demolition waste on site, - 95% construction waste to be diverted from landfill for reuse, recycling or recovery, - 95% excavation waste to be diverted from landfill for beneficial use, - 85% municipal waste rate by 2030, - 50% building materials to incorporate recycled content. The proposed new trees will not only provide additional greenery and boost biodiversity, but will form an externally shaded space for the residents. ***Urban Greening / Biodiversity***	

	London Plan Policy G6 and Local Plan Policy DM21 require proposals to manage impacts on biodiversity and aim to secure a biodiversity net gain. Additional greening should be provided through high-quality, durable measures that contribute to London's biodiversity and mitigate the urban heat island impact. This should include tree planting, shrubs, hedges, living roofs, and urban food growing. Specifically, living roofs and walls are encouraged in the London Plan. Amongst other benefits, these will increase biodiversity and reduce surface water runoff. The biodiversity net-gain calculation is missing. Action: - Please provide the biodiversity net-gain calculation. It is recommended to use the Biodiversity Metric 4.0. The calculation tools and user guide for the biodiversity metric are published on Natural England's Access to Evidence website. The user guide describes how to gather the information needed for the metric calculations. https://nepubprod.appspot.com/publication/6049804846366720 ***Living roofs*** No further comments. ***Non-Domestic BREEAM Requirement*** The applicant has not submitted a BREEAM Pre-Assessment Report for the non-residential part of the development. Although, the Sustainable design and construction statement addresses the required topics, the policy requires a quality assurance standard. Actions: - Submit the BREEAM Pre-Assessment report demonstrating that the development meets a 'Very Good' standard as a minimum, aiming for 'Excellent'. - A table should be submitted to demonstrate which credits will be met, how many are met out of the total available, under which category, which could be achieved, and which will not be met. This needs to include justification where targets are not met or 'potential' credits (where they are available under the Shell and Core assessment). This will enable better assessment of which credits. **Carbon Management Response 27/10/2023** In preparing this consultation response, we have reviewed: • Energy Statement - Issue 4 prepared by Energylab Consulting Ltd. (dated 19 Oct 2023)	

- Sustainable Design and Construction Statement - Issue 2 prepared by Energylab Consulting Ltd. (dated 19 Sep 2023)
- Overheating Risk Assessment Issue 3 – prepared by Energylab Consulting Ltd. (dated 20 Oct 2023)
- BREEAM Pre-Assessment prepared by EnergyLab Consulting Ltd. (dated 16th Oct 2023)
- Other relevant supporting documents.

1. Summary

The applicant has remodelled the carbon emissions for the development, using consistent building parameters and has now reported carbon reduction summary for both residential and non-residential uses as per the GLA energy assessment guidance. The applicant has also remodelled the overheating risks and included external blinds into their overheating mitigation strategy.

The development now achieves a site-wide reduction of 58% in on-site carbon dioxide emissions calculated with Part L 2021. Electric boilers are proposed for heating the new build dwellings which will require a quality-assured construction method and design to deliver the low space heating demand in later stage as currently modelled.

Suitable planning conditions have been recommended to secure the benefits of the scheme.

2. Energy Strategy

The revised overall predicted reduction in CO_2 emissions for the development shows an improvement of approximately 58% in carbon emissions with SAP10.2 carbon factors, from the Baseline development model (which is Part L 2021 compliant). This represents an annual saving of approximately 8.06 tonnes of CO_2 from a baseline of 13.09 tCO_2/year.

Site-wide (SAP10.2 emission factors)			
	Total regulated emissions (Tonnes CO_2 / year)	**CO_2 savings (Tonnes CO_2 / year)**	**Percentage savings (%)**
Part L 2021 baseline	13.09		
Be Lean	12.49	1.41	10%
Be Clean	7.71	4.78	34%
Be Green	5.84	1.87	13%

Cumulative savings		8.06	58%
Carbon shortfall to offset (tCO_2)	5.84		
Carbon offset contribution	£95 x 30 years x 5.84 tCO_2/year = £16,644		
10% management fee	£1,664.4		
Total	£18,308.4		

Residential (SAP10.2)			
	Total regulated emissions (Tonnes CO_2 / year)	**CO_2 savings (Tonnes CO_2 / year)**	**Percentage savings (%)**
Part L 2021 baseline	11.86		
Be Lean	10.73	1.13	10%
Be Clean	5.95	4.73	40%
Be Green	5.06	0.89	8%
Cumulative savings		6.80	53%
Carbon shortfall to offset (tCO_2)	5.06		

Non-residential (SAP10.2)			
	Total regulated emissions (Tonnes CO_2 / year)	**CO_2 savings (Tonnes CO_2 / year)**	**Percentage savings (%)**
Part L 2021 baseline	2.04		
Be Lean	1.76	0.28	14%
Be Clean	1.76	0	0%
Be Green	0.79	0.97	48%

Cumulative savings		1.26	61%
Carbon shortfall to offset (tCO_2)	0.79		

Energy Use Intensity/Space Heating Demand

Building type	**EUI (kWh/m^2/year)**	**Space Heating Demand (kWh/m^2/year)**	**Methodology used**
Residential	46.6	10.9	Part L1 - SAP 10.2 & none dwellings/& Landlord Circulation
Non-Residential	23.54	2.7	

Energy – Lean

The applicant has proposed a saving of 1.41 tCO_2 in carbon emissions (10%) through improved energy efficiency standards in key elements of the build, based on SAP10.2 carbon factors. The residential part of the development achieves 10% carbon reduction which marginally complies with the minimum 10% reduction set in London Plan Policy SI2. The non-residential part of the development achieves 14% carbon reduction which is below the 15% reduction set in London Plan Policy SI2. It is recommended to further improve the building fabric in later stages.

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

Floor u-value	0.09 W/m^{2}K
External wall u-value	0.14 W/m^{2}K
Roof u-value	0.10 W/m^{2}K
Door u-value	0.90 W/m^{2}K
Window u-value	0.90 W/m^{2}K
G-value	0.4
Air permeability rate	3 m^3/hm^2 @ 50Pa
Ventilation strategy	Mechanical ventilation with heat recovery (MVHR 90% efficiency;

Thermal bridging	Accredited Construction Details, y-value = 0.04
Low energy lighting	100%
Thermal mass	Medium
Improvement from the target fabric energy efficiency (TFEE)	-8% improvement, from 28.11 to 30.54 kWh/m^2

Actions:

- It is recommended that the building fabric is further improved following the fabric first approach of the energy hierarchy.

Overheating is dealt with in more detail below.

Energy – Clean
No further comments.

Energy – Green
The applicant confirms ASHP strategy is not feasible and viable option due to space, visual and noise impact on the adjacent residential buildings. The cost comparison between the use of electric boiler and ASHP presented in the report focuses on the capital costs, and embodied carbon concluding electric boiler to be viable option. This is further supported by the reduced running costs with low space heating demand than the GLA benchmark. Whilst the space heating demand for the residential dwellings is fairly low, using an electric heating solution should only be progressed where a quality-assured construction method and design delivers the low space heating demand as modelled.

Actions:

- Please make sure a quality-assured construction method and design delivers the low space heating demand in later stage as currently modelled. This will be conditioned.

Energy – Be Seen
The applicant confirms sub-metering to be implemented for residential and non-residential units.

3. Carbon Offset Contribution
A carbon shortfall of 5.84 tCO_2/year remains. The remaining carbon emissions will need to be offset at £95/tCO_2 over 30 years.

4. Overheating

Following discussion, the application has confirmed that external shading will form part of the overheating mitigation strategy. External shading will help reduce the overheating risks and ventilation demand. Updated elevations have been submitted.

The assessment has reported the results of Model A, Model B and Model C. TM59 criteria for predominantly mechanically ventilated dwellings have been applied to the duplex ground/lower ground floor flats due to potential security risks associated with openable windows.

1. Model A utilises solely passive measures with natural ventilation. All windows were modelled to open with 15% free area when temperatures exceeded 22°C except the ground floor flats where TM59 criteria for predominantly mechanically ventilated rooms was applied.
2. Model B utilises the above passive measures with continuous mechanical ventilation with heat recovery (MVHR) with 0.15 air changes per hour (ACH).
3. Model C utilises the above measures with active cooling via a split-system for remaining high-risk spaces.

Results are listed in the table below.

	TM59 – criterion A (<3% hours of overheating)	**TM59 – criterion B hours >26°C (pass <33 hours)**	**Pre-dominantly mechanically ventilated criteria**	**Number of habitable rooms pass TM59**
Model A: DSY1 2020s	15/27	5/16	2/15	17/42
Model B: DSY1 2020s	27/27	16/16	10/15	37/42
Model C: DSY1 2020s	27/27	16/16	15/15	42/42
Model C: DSY2 2020s	19/27	0/16	13/15	16/42
Model C: DSY3 2020s	18/27	0/16	1/15	2/42
DSY1 2050s	20/27	0/16	2/15	6/42
DSY1 2080s	0/27	0/16	0/15	0/42

Non-Residential
The applicant has also undertaken, a CIBSE TM52 Overheating Assessment for the proposed non-domestic church building. The assessment has been developed in line with the London Plan Cooling Hierarchy principles to mitigate overheating risk utilising a passive approach. Three models were assessed using the London Weather Centre files.

	Criteria 1 (%Hrs Top-Tmax>=1K)	**Criteria 2 (Max. Daily Deg.Hrs)**	**Criteria 3 (Max. DeltaT)**	**Number of spaces pass**
Model A: DSY1 2020s	1/3	0/3	2/3	1/3
Model B: DSY1 2020s	2/3	1/3	2/3	2/3
Model C: DSY1 2020s	3/3	3/3	3/3	3/3

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

- Natural ventilation, with openable areas restricted to opening angle of 15° due to noise impacts.
- Glazing g-value of 0.4
- External shading for a number of dwellings utilising balcony
- External shading devices/buildups and external louvres to all windows facing the main road and rooms facing south.
- MVHR with summer overpass
- A water-cooled split cooling system for spaces at high risk of overheating without the requirement of an external unit i.e. ground floor flats.

<u>Future mitigation measures:</u>

- The potential to include/install external windows shutters
- Installation of tinted windows and/or applying tinted films to window`s glass
- Update the proposed MVHR to provide comfort cooling with minimal extension to the existing kit (does not need any external outdoor units installation and all can be done within the utility cupboard)
- Planting additional trees where potentially possible

Overheating Actions:

- 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).
- This development should have a building user guide to mitigate overheating risk for occupants. Please make sure the building user guide clearly mentions the windows can be opened 15º if there are any noise issues during occupation, and opened further when there are no noise issues.

5. Sustainability

No further comments.

Urban Greening / Biodiversity

The biodiversity net-gain calculation is missing.

Action:

- Please provide the biodiversity net-gain calculation. It is recommended to use the Biodiversity Metric 4.0. The calculation tools and user guide for the biodiversity metric are published on Natural England's Access to Evidence website. The user guide describes how to gather the information needed for the metric calculations. https://nepubprod.appspot.com/publication/6049804846366720

Living roofs

No further comments.

Non-Domestic BREEAM Requirement

The applicant has now submitted a BREEAM Pre-Assessment Report for the non-residential units. Based on this report, a score of 61.53 % is expected to be achieved, equivalent to 'Very Good' rating. A potential score of 79.37 % could be achieved which should be aimed.

6. Planning Obligations Heads of Terms

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

	- Estimated carbon offset contribution (and associated obligations) of £12,739.5 (indicative), plus a 10% management fee; carbon offset contribution to be re-calculated at £2,850 per tCO2 at the Energy Plan and Sustainability Review stages. **7. Planning Conditions** ***Energy strategy*** *The development hereby approved shall be constructed in accordance with the Energy statement – Issue 4 prepared by Energylab Consulting Ltd. (dated 19 Oct 2023) delivering a minimum 58% improvement on carbon emissions over 2021 Building Regulations Part L, with SAP10.2 emission factors, high fabric efficiencies, and a minimum 12.7 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;* - *Confirmation of the necessary fabric efficiencies to achieve a minimum 10% reduction with SAP10.2 carbon factors* - *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;* - *Confirmation of the quality assured method to ensure the energy efficiency of the fabric is delivered as approved;* - *A metering strategy*	

	The development shall be carried out strictly in accordance with the details so approved prior to first operation and shall be maintained and retained for the lifetime of the development. The solar PV array shall be installed with monitoring equipment prior to completion and shall be maintained at least annually thereafter. *(b) The solar PV arrays and ASHPs must be installed and brought into use prior to first occupation of the relevant block. Six months following the first occupation of that block, evidence that the solar PV arrays have been installed correctly and are operational shall be submitted to and approved by the Local Planning Authority, including photographs of the solar array, installer confirmation, an energy generation statement for the period that the solar PV array has been installed, and a Microgeneration Certification Scheme certificate.* *(c) Within six months of first occupation, evidence shall be submitted to the Local Planning Authority that the development has been registered on the GLA's Be Seen energy monitoring platform.* *Reason: To ensure the development reduces its impact on climate change by reducing carbon emissions on site in compliance with the Energy Hierarchy, and in line with London Plan (2021) Policy SI2, and Local Plan (2017) Policies SP4 and DM22.* ***Overheating*** *Prior to the above ground commencement of the development, an updated Overheating Report shall be submitted to and approved by the Local Planning Authority. The submission shall assess the overheating risk and propose a retrofit plan. This assessment shall be based on the Overheating Risk Assessment Issue 3 – prepared by Energylab Consulting Ltd. (dated 20 Oct 2023).* *This report shall include:* - *Revised modelling of units modelled based on CIBSE TM59, using the CIBSE TM49 London Weather Centre files for the DSY1-3 (2020s) and DSY1 2050s and 2080s, high emissions, 50% percentile;* - *Demonstrating the mandatory pass for DSY1 2020s can be achieved following the Cooling Hierarchy and in compliance with Building Regulations Part O, demonstrating that any risk of crime, noise and air quality issues are mitigated appropriately evidenced by the proposed location and specification of measures;* - *Modelling of mitigation measures required to pass future weather files, clearly setting out which measures will be delivered before occupation and which measures will form part of the retrofit plan;*	

	- *Confirmation that the retrofit measures can be integrated within the design (e.g., if there is space for pipework to allow the retrofitting of cooling and ventilation equipment), setting out mitigation measures in line with the Cooling Hierarchy;* - *Confirmation who will be responsible to mitigate the overheating risk once the development is occupied.* *(b) Prior to occupation of the development, details of internal blinds to all habitable rooms must be submitted for approval by the local planning authority. This should include the fixing mechanism, specification of the blinds, shading coefficient, etc. Occupiers must retain internal blinds for the lifetime of the development, or replace the blinds with equivalent or better shading coefficient specifications.* *(c) Prior to occupation, the development must be built in accordance with the approved overheating measures and retained thereafter for the lifetime of the development:* - *Natural ventilation, with openable areas restricted to opening angle of 15°;* - *Glazing g-value of 0.4;* - *External shading for a number of dwellings utilising balcony;* - *External shading devices/buildups and external louvres to all windows facing the main road and rooms facing south;* - *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 for overheating*** *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. The building user guide should clearly mention the windows can be opened 15^{o} if there are any noise issues during occupation, and opened further when there are no noise issues.*	

	Reason: In the interest of reducing the impacts of climate change and mitigation of overheating risk, in accordance with London Plan (2021) Policy SI4, and Local Plan (2017) Policies SP4 and DM21. ***Living roof*** *(a) Prior to the above ground commencement of development, details of the living roof must be submitted to and approved in writing by the Local Planning Authority. Living roof must be planted with flowering species that provide amenity and biodiversity value at different times of year. Plants must be grown and sourced from the UK and all soils and compost used must be peat-free, to reduce the impact on climate change. The submission shall include:* *i) A roof plan identifying where the living roof will be located;* *ii) A section demonstrating settled substrate levels of no less than 120mm for extensive living roofs (varying depths of 120-180mm), and no less than 250mm for intensive living roofs (including planters on amenity roof terraces);* *iii) Roof plans annotating details of the substrate: showing at least two substrate types across the roof, annotating contours of the varying depths of substrate* *iv) Details of the proposed type of invertebrate habitat structures with a minimum of one feature per 30m^2 of living roof: substrate mounds and 0.5m high sandy piles in areas with the greatest structural support to provide a variation in habitat; semi-buried log piles / flat stones for invertebrates with a minimum footprint of 1m^2, rope coils, pebble mounds of water trays;* *v) Details on the range and seed spread of native species of (wild)flowers and herbs (minimum 10g/m^2) and density of plug plants planted (minimum 20/m^2 with root ball of plugs 25cm^3) to benefit native wildlife, suitable for the amount of direct sunshine/shading of the different living roof spaces. The living roof will not rely on one species of plant life such as Sedum (which are not native);* *vi) Roof plans and sections showing the relationship between the living roof areas and photovoltaic array; and* *vii) Management and maintenance plan, including frequency of watering arrangements.* *viii) A section showing the build-up of the blue roof and confirmation of the water attenuation properties, and feasibility of collecting the rainwater and using this on site;* *(b) Prior to the occupation of 90% of the dwellings, evidence must be submitted to and approved by the Local Planning Authority that the living roof has been delivered in line with the details set out in point (a). This evidence shall include photographs demonstrating the measured depth of substrate, planting and biodiversity measures. If the Local Planning Authority finds that the living roof has not been delivered to the approved standards, the applicant shall rectify this to ensure it complies with the condition. The living roof*	

	shall be retained thereafter for the lifetime of the development in accordance with the approved management arrangements. *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, a sensitive lighting scheme, justification for the location and type of enhancement measures by a qualified ecologist, and how the development will support and protect local wildlife and natural habitats.* *(b) Prior to the occupation of development, photographic evidence and a post-development ecological field survey and impact assessment shall be submitted to and approved by the Local Planning Authority to demonstrate the delivery of the ecological enhancement and protection measures is in accordance with the approved measures and in accordance with CIEEM standards.* *Development shall accord with the details as approved and retained for the lifetime of the development.* *Reason: To ensure that the development provides the maximum provision towards the creation of habitats for biodiversity and the mitigation and adaptation of climate change. In accordance with London Plan (2021) Policies G1, G5, G6, SI1 and SI2 and Local Plan (2017) Policies SP4, SP5, SP11 and SP13.* ***BREEAM Pre-Assessment*** *(a) Prior to commencement on site, a design stage accreditation certificate for non-residential category must be submitted to the Local Planning Authority confirming that the development will achieve a BREEAM "Very Good" outcome (or equivalent), aiming for "Excellent". This should be accompanied by a tracker demonstrating which credits are being targeted, and why other credits cannot be met on site.* *The development shall then be constructed in strict accordance with the details so approved, shall achieve the agreed rating and shall be maintained as such thereafter for the lifetime of the development.*	

	(b) Prior to occupation, a post-construction certificate issued by the Building Research Establishment must be submitted to the local authority for approval, confirming this standard has been achieved. *In the event that the development fails to achieve the agreed rating for the development, a full schedule and costings of remedial works required to achieve this rating shall be submitted for our written approval with 2 months of the submission of the post construction certificate. Thereafter the schedule of remedial works must be implemented on site within 3 months of the Local Authority's approval of the schedule, or the full costs and management fees given to the Council for offsite remedial actions.* *Reason: In the interest of addressing climate change and securing sustainable development in accordance with London Plan (2021) Policies SI2, SI3 and SI4, and Local Plan (2017) Policies SP4 and DM21.* ***Water Butts*** *No dwelling 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.* *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.*	
Pollution	Having considered all the following relevant supporting information i.e. Design and Access Statement, Basement impact Assessment with reference BIA/12942 prepared by Chelmer Global Ltd, dated 21st December 2022 and taken note of Sections 3 (Desk Study), 4 (Screening and Scoping Assessment), 5 (Site Investigation & Geotechnical Interpretation), 6 (Construction Methodology & Ground Movement Assessment) and 7 (Basement Impact Assessment), Energy Statement prepared by energylab_ Consulting Ltd, dated 21st December 2022 and taken note of the proposed use of electrical boilers and Photovoltaic (solar) panels as well as the applicant submitted Air Quality Assessment prepared by Aeolus Air Quality Consulting Ltd dated 19th December 2022 and taken note of Sections 3 (Methodology), 4 (Baseline Conditions), 5 (Potential Impacts), 6 (Mitigation Measures) and 7 (Conclusion). Please be advised 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. 1. Land Contamination	Comments noted Conditions included

	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. This shall be submitted to, and approved in writing by the Local Planning Authority prior to that investigation being carried out on site. 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, along with the site investigation report shall be submitted to, and approved in writing by, the Local Planning Authority. e. If the risk assessment and refined Conceptual Model indicate any risk of harm, a Method Statement detailing the remediation requirements, using the information obtained from the site investigation, and also detailing any post remedial monitoring shall be submitted to, and approved in writing by, the Local Planning Authority prior to that remediation being carried out on site. f. 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. Updated Air Quality Assessment Whilst the submitted Air Quality Assessment report Aeolus Air Quality Consulting Ltd dated 19th December 2022 is noted however, considering the distance of the proposed development to the monitoring sites used as baselines are not fully representative of the development site. An updated AQ assessment will need to be conducted so as to determine the actual existing baseline concentration in order to know the level of mitigation that will be required for the various floors of the development. Moreover whilst we also take note of the use of Photovoltaic Panels (PV) as the source of energy for the proposed development, the applicant will need to undertake a revised AQ Neutral Assessment which provides sufficient detail and calculations to support that the development is neutral in regards to transport emissions – including trip lengths and vehicle emission rates for the road transport emissions. Therefore, in other to minimise increased exposure to existing poor air quality and make provision to address local problems of air quality (particularly within Air Quality Management Areas (AQMAs) where development is likely to be used by large numbers of those particularly vulnerable to poor air quality, such as children or older people) • Actual baseline monitoring will need to be undertaking at or within the close proximity of the site itself rather than relying purely on baseline monitoring farther away from the site or Defra mapped background concentrations. • A revised Air Quality Neutral Assessment, that demonstrates the development is neutral in regards to transport emissions including trip lengths and vehicle emission rates for the road transport emissions must be undertaken and submitted for approval. Reason: To Comply with Policy 7.14 of the London Plan and the GLA SPG Sustainable Design and Construction. 4. 4 NRMM	

	a. No works shall commence on the site until all plant and machinery to be used at the demolition and construction phases have been submitted to, and approved in writing by, the Local Planning Authority. Evidence is required to meet Stage IIIB of EU Directive 97/68/ EC for both NOx and PM. No works shall be carried out on site until all Non-Road Mobile Machinery (NRMM) and plant to be used on the site of net power between 37kW and 560 kW has been registered at http://nrmm.london/. Proof of registration must be submitted to the Local Planning Authority prior to the commencement of any works on site. b. An inventory of all NRMM must be kept on site during the course of the demolitions, site preparation and construction phases. All machinery should be regularly serviced and service logs kept on site for inspection. Records should be kept on site which details proof of emission limits for all equipment. This documentation should be made available to local authority officers as required until development completion. Reason: To protect local air quality and comply with Policy 7.14 of the London Plan and the GLA NRMM LEZ 5. Demolition/Construction Environmental Management Plans c. 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 d. 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.	

	The development shall be carried out in accordance with the approved details. Additionally, the site or Contractor Company must be registered with the Considerate Constructors Scheme. Proof of registration must be sent to the Local Planning Authority prior to any works being carried out. Reason: To safeguard residential amenity, reduce congestion and mitigate obstruction to the flow of traffic, protect air quality and the amenity of the locality. Informative: 1. Prior to demolition of existing buildings where applicable, 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.	
EXTERNAL		
Thames Water	Waste Comments 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 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	Comments noted. Condition/Informative included

	water from new developments should follow Policy SI 13 Sustainable drainage of the London Plan 2021. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. Should you require further information please refer to our website. https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes 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-your-development/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 There are public sewers crossing or close to your development. If you're planning significant work near our sewers, it's important that you minimize the risk of damage. We’ll need to check that your development doesn’t limit repair or maintenance activities, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes Thames Water would advise that with regard to WASTE WATER NETWORK and SEWAGE TREATMENT WORKS infrastructure capacity, we would not have any objection to the above planning application, based on the information provided. Water Comments There are water mains crossing or close to your development. Thames Water do NOT permit the building over or construction within 3m of water mains. If you're planning significant works near	

	our mains (within 3m) we'll need to check that your development doesn't reduce capacity, limit repair or maintenance activities during and after construction, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes The proposed development is located within 15m of our underground water assets and as such we would like the following informative attached to any approval granted. The proposed development is located within 15m of Thames Waters underground assets, as such the development could cause the assets to fail if appropriate measures are not taken. Please read our guide 'working near our assets' to ensure your workings are in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk 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.	

Designing Out Crime	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

Transport for London	Thank you for consulting TfL. With regards to the above planning application, TfL has the following comments: The site of the proposed development is approximately 500 metres from the A105, High Road which forms part of the Strategic Road Network (SRN). TfL has a duty under the Traffic Management Act 2004 to ensure that any development does not have an adverse impact on the SRN. The proposed 40 cycle parking spaces are in line with London Plan policy T5 part B. A minimum of 27 of these spaces are required to be long stay and 5 are required to be short stay spaces. These should be located in a secure, sheltered and accessible location, and should meet design standards set out in Chapter 8 of the London Cycle Design Standards (LCDS) The Transport Statement states that this development will be a car-free development which is required, however on the proposed plans there are 2 new non-blue badge spaces, this is not in line with London Plan policy T6.1 part A, the PTAL of the site is 6a and should therefore be car free. Please notify TfL if there are any further works proposed within the London Underground Zone of Influence. Subject to the above conditions being met, the proposal as it stands would not result in an unacceptable impact to the Strategic Road Network (SRN).	Comments noted/condition included
Historic England	Thank you for your letter of 24 January 2023 regarding the above application for planning permission. Historic England provides advice when our engagement can add most value. In this case we are not offering advice. This should not be interpreted as comment on the merits of the application. We suggest that you seek the views of your specialist conservation and archaeological advisers. You may also find it helpful to refer to our published advice at https://historicengland.org.uk/advice/find/	Comments noted

	It is not necessary to consult us on this application again, unless there are material changes to the proposals. However, if you would like advice from us, please contact us to explain your request. Please note that this response relates to designated heritage assets only. If the proposals meet the Greater London Archaeological Advisory Service's published consultation criteria we recommend that you seek their view as specialist archaeological adviser to the local planning authority. The full GLAAS consultation criteria are on our webpage at the following link: https://www.historicengland.org.uk/services-skills/our-planning-services/greater-london-archaeology-advisory-service/our-advice/	
The Victorian Society	Braemar Avenue Baptist Church is a significant Grade II listed building within the Trinity Green Conservation Area. Built in 1907 by George Baines, the church is a characterful architectural composition with a distinctive tower and palette of materials. It has high aesthetic significance and makes a strong contribution to the Conservation Area and surrounding townscape. Next to the church is a former church hall, built before the present church, it is typical of lightweight, easy construct buildings of the 19th century, often used to accommodate churches and community uses. Although unlisted it is within the Conservation Area and has historic significance in communicating the social and religious history of the area. The proposals would see the demolition of the existing former church hall and the construction of a new 4 storey building accommodating church/community uses and dwellings. The demolition of the existing former hall building would harm the significance of the listed church by the loss of a building which communicates the church's history this would also harm the significance of the Conservation by the loss of a building that has historical significance. The proposed new building would negatively impact the setting of the listed building due to its height and any acceptable proposal must be lower than the ridge height of the listed building. The design of the proposed building also raises concern, it does not harmonise well with the listed building, or the neighbouring terraces, it could interact more successful if the form was further broken up and design features such as pitched roofs were utilised. We recommend the retention and restoration of the church hall building for church and community use. However, if you're authority is minded to accept the principle of a new building then we recommend that the design is reconsidered, and its height reduced.	Objections noted As set out in the Heritage Impact section, the Conservation Officer advises that the design value of the existing church hall is low, as its fabric is in a decayed state, suffers from evident structural issues and all the architectural features that contributed to the architectural quality of the former church hall have been lost The proposed development will lead to a very low, less than substantial harm to the

	the NPPF states: '206. Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance.' This proposal as submitted would not ensure that the significance of the Conservation area or listed building would be better revealed. I would be grateful if you could inform me of your decision in due course	significance of the conservation area and its assets that is outweighed by the public benefits of the development noted in the impact on heritage section.
Neighbouring Properties		
	Land Use and housing - No affordable housing provision - Concerns with the viability of the scheme - An independent review of the viability should be undertaken - Excessive number of dwellings proposed	**Land Use and housing** The Council's independent viability consultant has reviewed the applicant's viability report and concludes that the proposed development is unable to provide affordable housing on this site. The viability report also sets out that the development will enable the required restoration works to the listed church to be carried out. The number of dwellings proposed do not generate design or density concerns

	- Housing is not ancillary to the existing use as a Church Hall	Delivery of housing is essential to meeting Local Plan Housing targets.
	- The new community hall would not benefit the local community - A community needs assessment is required	As noted in the principle of development section, the new hall will be flexible to accommodate other activities for the local community such as a creche, coffee mornings, meeting space, 'kids' club and polling station. The new church hall may also be hired for other appropriate events, which can be a vital small income stream for the church. Further consultation with the local community will take place to determine other potential uses that are desired.
	- Poor residential accommodation at basement level	The residential accommodation at basement level is considered acceptable as the flats in question are maisonettes and therefore none of the flats would be entirely at

	Impact on Heritage Assets - Demolition of a listed building; - Demolition in a Conservation Area; - Consideration should be given to the retention and restoration of the existing church hall - Inappropriate development within the curtilage of the listed building - Design and scale not in keeping with the Conservation Area - Any proposal should be lower than the ridge of the listed building - Harm to the Conservation Area - The design and scale is harmful to the setting of the listed building - The NPPF on listed buildings and heritage assets has not been adequately addressed - The development fails the public benefit test in the NPPF - Heritage statement flawed - The listed buildings should be protected - The proposal would fail to preserve or enhance the historic character of the Conservation	basement level. Also the flats will be served by good sized lightwells to enable sufficient outlook from the rooms. **Impact on Heritage Assets** The proposed scheme has benefitted from extensive pre-application discussions with the Conservation Officer. As noted in the Heritage Impact section, the Conservation Officer advises that the design value of the existing church hall is low, as its fabric is in a decayed state, suffers from evident structural issues and all the architectural features that contributed to the architectural quality of the former church hall have been lost The proposed development will lead to a very low, less than substantial harm to the

	Size, Scale and Design - The architectural form does not respond to the context - The design is not in keeping with surrounding properties - The design is not in keeping with the church - Poor quality design - The scheme should be redesigned - The development should be significantly reduced in scale - Excessive height, bulk, massing and scale - Overbearing in relation to neighbouring buildings - Overdevelopment of site - The skyline will be obscured by the development - Balconies out of character with the street - Visual impact - Obtrusive - Poor basement layout	significance of the conservation area and its assets that is outweighed by the public benefits of the development noted in the impact on heritage section. **Size, Scale and Design** The proposed design and scale of the development provides a high-quality design and greatly improves their relationship to the street and its neighbourhood, whilst being sensitive to the heritage and parkland settings in line with the relevant policies This proposed development is considered appropriate in this location From a design point of view, the basement layout is entirely suitable and appropriate **Impact on neighbours**

	Impact on neighbours - Loss of privacy/overlooking/overshadowing - Loss of daylight and sunlight - Noise and disturbance - Increased sense of enclosure - Overbearing	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.
	Parking, Transport and Highways - Pressure on parking - Road safety concerns - Parking should be provided - Traffic congestion - Concerns with emergency vehicle access - Increased delivery vehicles - Concerns with the 2 new car parking spaces - Access concerns - Construction logistics plan is misleading - Transport statement flawed - More electric car charging facilities are needed	**Parking, Transport and Highways** 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 impacts
	Environment and Public Health - Significant increase in pollution - Noise report flawed. - Major disruption to the local community	**Environment and Public Health** Any dust and noise relating to demolition and construction works would

	- Impact on the quality of life of local residents - Public health concerns - Impact on the water system - Noise pollution - Pressure on existing infrastructure	be temporary impacts that are typically controlled by non planning legislation. Nevertheless, the demolition and construction methodology for the development would be controlled by the imposition of a condition As noted in the air quality section an Air Quality Assessment is required which Officers are satisfied can be adequately addressed at a later stage, and as such this matter can be secured by the imposition of a condition. A noise management plan and scheme for sound insulation of the basement extension is secured via condition The scheme would provide a CIL payment towards local infrastructure

	- Loss of mature trees - Concerns the basement development would result in structural damage to neighbouring buildings, damage to trees - Impact on Nightingale Gardens	Adequate new and replacement trees are provided The long term management of the trees is secured via a condition
	- Impact on biodiversity - Impact on wildlife - Impact on the bat colony	Details of ecological enhancement measures and ecological protection measures is secured via condition
	- Loss of garden land and open space	Whilst there will be a reduction in garden space the proposal the proposal would include comprehensive landscaping around the development and the existing landscaping will be improved.
	- Insufficient refuse provision	The Council's Waste Management Officer is satisfied with the proposed arrangement for the refuse/recycling bin collection.

	- Excessive basement **Sustainability** - No mention of low carbon energy resources - Concerns how a green roof with solar panels can coexist	Officers consider that the submitted Basement Impact Assessment meets the local plan policy requirement. The councils Building Control Officer has advised that it will be the responsibility of the structural engineer and the applicant to ensure that the basement construction is sound The basement development is considered acceptable subject to a detailed construction management plan condition to ensure there is no affects beyond category 1 impacts of the Burland Scale to ensure that the basement construction does not cause damage to adjacent properties **Sustainability** The Climate Change Officer has assessed these points and which have been covered in

	Others - Fire Safety and Building Regulations should be adhered to	the main body of the report and concludes that the proposed development is considered acceptable, in terms of its sustainability. **Others** Details of a more detailed fire strategy/fire engineered design is secured via condition

Appendix 5 - QRP Report

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FRAME PROJECTS

London Borough of Haringey Quality Review Panel

Report of Formal Review Meeting: Braemar Avenue Baptist Church

Wednesday 15 December 2021
Via video conference

Panel

Hari Phillips (chair)
Phil Armitage
Hugo Nowell
Joanna Sutherland
Lindsey Whitelaw

Attendees

John McRory	London Borough of Haringey
Richard Truscott	London Borough of Haringey
Elisabetta Tonazzi	London Borough of Haringey
Valerie Okeiyi	London Borough of Haringey
Adrian Harvey	Frame Projects
Adela Paparisto	Frame Projects

Apologies / report copied to

Deborah Denner	Frame Projects
Rob Krzyszowski	London Borough of Haringey
Robbie McNaugher,	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.

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1. Project name and site address

Braemar Avenue Baptist Church, Braemar Avenue, London N22 7BY

2. Presenting team

Andrew Budgen	Spacelab / Urbanlab
Sam Jackson	The Built Heritage Consultancy
Mandip Sahota	NTA Planning
Mohanad Alnaimy	Energylab

3. Aims of the Quality Review Panel meeting

The Quality Review Panel provides impartial and objective advice from a diverse range of highly experienced practitioners. This report draws together the panel's advice, and is not intended to be a minute of the proceedings. It is intended that the panel's advice may assist the development management team in negotiating design improvements where appropriate and in addition may support decision-making by the Planning Committee, in order to secure the highest possible quality of development.

4. Planning authority briefing

This site is located at the top of Braemar Avenue to the eastern side, at the junction with Bounds Green Road. The main grade II listed church building is built in a late Gothic Revival style in contrasting flintwork and dark red brickwork with terracotta dressings. To the north-western corner is a prominent tower that extends higher than the steeply pitched, gabled roof of the main church. On the southern elevation is the main entrance and extensions to the rear and southern elevation. To the south of the church is the original single storey, corrugated iron Church Hall, built as a temporary structure albeit older than the church itself, and is in a derelict condition. To the east is a public park known as Nightingale Gardens. The wider surrounding area is predominantly residential in character, but with a number of institutional and community buildings along Bounds Green Road and Trinity Gardens. The site lies in the north-western part of the Trinity Gardens Conservation Area, and it has a PTAL value of 6A. Officers would welcome the panel's views on the overall design quality of the proposals, and in particular its relationship to the sensitive context and on the proposed approach to trees.

5. Quality Review Panel's views

Summary

The panel thanks the design team for their comprehensive presentation and feels that the scheme offers a number of benefits, not least the improvements to the listed church and the provision of a valuable community facility. However, it is unconvinced by the case for the basement-level church hall and would like to see options explored for providing this at ground level to allow for a positive relationship with Nightingale Gardens.

The panel is comfortable with the proposed height and massing, and finds much that is positive in the architectural treatment. It does feel that the architecture could be more assertive and would like to see some of the earlier materials proposed reconsidered for inclusion in the façades. The approach to landscape is positive and the panel would like to see indigenous species selected, as well as a green roof that provides the most biodiverse solution possible. It feels that the ambitions as regards sustainability are good, and the challenge now is to bring them to life and integrate the approach into the design of the scheme. In particular, the panel feels that the embodied carbon of the proposals should be formally assessed and should guide the design and selection of materials.

Height, massing, and architectural treatment

- The panel is comfortable with the proposed height and massing of the building and feels that it achieves a successful transition from the housing along Braemar Avenue to the church.

- The proportions and verticality of the architecture are successful, although the panel feels that the elevations lack some confidence. A more assertive architectural language that relates more positively to its context, while recognising the supportive role the building plays in relation to the church, might be more appropriate.

- The panel questions whether the stepping back of the building to reveal the church is necessary and feels that this is detrimental to the building's design; it would like to see further visualisations to explore this. It also feels that the additional break in the left-hand bay unbalances the composition.

- The panel welcomes the design development of the architecture. However, it feels that the earlier materials, and particularly the metals, were more successful and had more potential than the red brick ultimately selected. The potential for integrating the metal into the façade, possibly replacing the proposed cladding material on the top floor, should be explored.

- The use of MVHR within the building is positive, but the panel would like to see the visual impact this will have on the elevations.

The church hall

- The panel questions the viability assumptions that underpin the decision to locate the church hall at basement level. It is similarly unconvinced by the acoustic argument, and feels that the opportunity to create a light, airy community space with a positive relationship to Nightingale Gardens outweighs the case for a basement solution.

- The view through the glass annex has the potential to contribute significantly to its setting, and the panel feels that a ground-level church hall would allow for more to be made of this.

- It questions whether there is scope for locating a ground-level hall at the back of the building, facing the park. The consequent loss of the residential units here could be offset by avoiding the need to excavate, to install a lift, and to provide a second kitchen.

- The panel would accept the additional public benefit of a ground-level hall as justification for not providing affordable housing on the site.

- As currently proposed, the ventilation of the basement hall requires further attention, and the panel questions where sufficient allowance has been made for ceiling height to accommodate the necessary plant.

Residential accommodation

- The dwellings on the southeast corner of the building may be overshadowed by trees and this should be rigorously tested. The ratio of glazing on the west elevation should be optimised for heat gain and daylighting.

- The single aspect dwellings, particularly on the ground floor, may be dark and lack sufficient ventilation.

- The panel notes that the location of the bin store, at the heart of the building, may well have a negative impact on the quality of the environment of the circulation around the core.

- The basement-level private amenity space may be at risk of flooding and this should be tested and appropriate drainage put in place.

- The arrangement of the fire escape routes, in relation to the stairs, ground floor dwellings and exits, should be assessed to ensure they comply with the fire regulations.

Sustainable design

- The sustainability ambitions for the scheme are positive, and the challenge will be in integrating this approach within the design process as a whole.
- The embodied carbon of the scheme should be properly and formally assessed, and this assessment should inform the development of the design and materials selected.
- The panel understands the reasons for choosing to avoid heat pumps but suggests that the need for an upgraded electricity supply be properly considered.

Landscape design and biodiversity

- The approach to landscape design is generally positive.
- The panel notes that the removal of the mature tree at the boundary with Nightingale Gardens may cause ground heave, and this will need to be properly considered, in consultation with the tree officer at Haringey.
- The panel would like to see it replaced with one, or potentially two, indigenous trees, and would prefer this to be the case for all trees introduced to the site.
- The panel would like to see the proposed green roof composed of indigenous species that provide an extensive, biodiverse living roof, rather than simply using sedum.

Next steps

- The panel would be happy to see the scheme again, if helpful.

Appendix 6 - Financial Viability Assessment (FVA)

BNP PARIBAS REAL ESTATE

DEVELOPMENT VIABILITY REVIEW – BRAEMAR AVENUE BAPTIST CHURCH, LONDON N22 7BY

In March 2023, London Borough of Haringey ("the Council") commissioned BNP Paribas Real Estate to advise on a viability assessment of the redevelopment ("the Development") of Braemar Avenue Baptist Church, London N22 7BY ("the Site") submitted by Redloft LLP ("RL") on behalf of Spacelab ("the Applicant").

Our report provided an independent assessment of RL's Viability Assessment Report to determine whether the affordable housing offer and Section 106 contributions as proposed have been optimised.

RL concluded that the proposed Development incorporating 100% private housing generated a deficit of -£686,040. We stated in our conclusion that given the purpose of the Development is to fund the reprovision of the church facilities, the outcome of the RL FVA indicates that this reprovision will not be possible, as there is unlikey to be any land payment. RL have not responded to this point in their most recent correspondence.

After review of the RL submission, we concluded that the proposed Development with 100% private housing generates a surplus of £33,196 against the viability benchmark. This surplus could be used as a commuted sum payment; or further Section 106 payments (should this be justifiable in planning terms).

For the reasons outlined in Section 5.4 of our original report, we recommended the Council include both early and late stage review mechanisms within the Section 106 Agreement.

RL further correspondence

RL have provided a response dated 11 April 2023 within which they have sought to provide further justification / evidence in support of their viability conclusion. We have reviewed the additional information provided and have responded in the same structure for ease of reference:

- **Professional fees:** In our March 2023 report, we reduced the professional fees allowance from 12% to 10%. We took into account factors such as site constraints and scheme complexity and did not consider a 12% allowance to be required for this scheme. We also took into account the monetary value of the percentage included within the appraisal.

  In their most recent correspondence, RL have referred to their experience of 'similar projects' they are working on. Further, RL have included a list of required consultants as well as an estimation for their fees in percentage terms. For the avoindance of doubt, we could also prepare a list of consultants and their respective fee requirements that results in a 10% allowance.

  Our experience supports our assumed professional fees allowance of 10% of construction costs. RL have not provided any further information as to what elements of this scheme make it more complex than other similar schemes. RL have not provided any justification / evidence that would warrant a change in our assumed allowance. We have therefore maintained our 10% professional fees allowance in our appraisal.

- **Consruction programme:** In our original report, we reduced the construction period from 22 months to 15 months. RL had not provided any evidence to support their assumed programme timetable; therefore, we based our assumption upon the RICS Build Cost Information Service ("BCIS") Duration Calculator.

  In their most recent correspondence, there is no site specific analysis; rather merely an unsupported assertion that the scheme would require a longer construction period. RL refer to site constraints and complexity but do not reference which particular elements would result in a prolonged timetable.

In contrast, as mentioned above, we have undertaken a benchmarking process which has resulted in our assumed construction period. RL have not provided any justification that would warrant a change in our position.

- **Planning obligations:** RL included the following planning obligations within their original appraisal for a 100% private housing scheme:

  - Borough CIL: £261,697; and
  - Mayoral CIL: £68,466.

  We adopted the above planning obligations on a 'subject to confirmation' basis.

  In their most recent correspondence, RL have provided updated planning obligation payments "on the basis of excluding the church extension, which is in use and therefore does not fall under Haringey CIL payment obligations." We have summarised the revised CIL payments below:

  - Borough CIL: £220,335.91; and
  - Mayoral CIL: £69,714.

  The total CIL payment is therefore £290,049.91. We have adopted the above payments in our appraisal on a 'subject to confirmation' and 'without prejudice' basis pending discussions with the Council.

- **Enabling costs:** In their original report, RL statd that there were 15 residential units within the proposed Development. However, it was also noted that "*as part of the enabling costs agreement between the applicant and the Church, Unit 1.2 will be assigned as a manse/vicar's residence and to be used at the Church's discretion.*"

  RL had originally included this unit as a private tenure apartment "*for the purpose of [the] viability assessment and in order to promote viability*". However, in their most recent correspondence, RL have stated that "*in light of progression on the commercial mattesr and discussions between the Applicant and Church, it has been confirmed the manse unit will not be income generating*". Therefore, RL have removed the unit from their appraisal resulting in a reduction to their GDV.

  We recommend the Council include provisions with the Section 106 Agreement preventing Unit 1.2 from being revenue generating. If this provision is not agreed to by the Applicant, we reserve the right to revisit our assumption of removing the unit from our assessment.

  As a result of removing Unit 1.2 from our appraisal, the total GDV has reduced from £7,068,880 to £6,502,080.

Updated Appraisal Results and Conclusion

In our original report, we concluded that the proposed Development with 100% private housing generated a surplus of £33,196 against the viability benchmark. This was in contrast to the deficit of -£686,040 concluded in the original RL assessment.

In their most recent correspondence, RL have updated their conclusion to report that the scheme with 100% private housing generates a defiit of -£628,042.

We have undertaken an updated appraisal, taking into account the amendments identified above. The proposed Development with 100% private housing generates a RLV of -£377,616 providing a deficit of -£377,616 against the viability benchmark.

We have maintained our recommendation that the Council include provisions for a review mechanism within the Section 106 Agreement.

In addition, we recommend the Council include provisions within the Section 106 Agreement preventing Unit 1.2 from being revenue generating. If this provision is not agreed to by the Applicant, we reserve the right to revsit our assumption of removing the unit from our assessment.

3 May 2023