

Appendix 2: Internal and External Consultee representations

Stakeholder	Question/Comment	Response												
INTERNAL														
LBH Carbon Management	<p>Carbon Management Response 30/01/2024</p> <p>In preparing this consultation response, we have reviewed:</p> <ul style="list-style-type: none"> • Energy Statement prepared by Expedition (dated 27 Oct 2023), including Overheating Assessment • Relevant supporting documents. <p>1. Summary</p> <p>The applicant submitted a revised energy statement, and the development now achieves a reduction of 43% carbon dioxide emissions on site against Part L 2021, which is lower than the previous statement which proposed a reduction of 53%.</p> <p>Although we recognise that inconsistencies in the previous energy modelling, particularly regarding fabric parameters, have led to changes in baseline values and subsequent carbon reduction figures, the overall decrease in carbon reduction is viewed as disappointing. It is recommended to explore more ways to further reduce carbon emissions on-site and maximise renewable energy generation as required by Policy SI2 and Policy SP4.</p> <p>Appropriate conditions have been recommended to secure the benefits of this scheme.</p> <table border="1" data-bbox="501 1126 1702 1382"> <thead> <tr> <th colspan="4" data-bbox="501 1126 1702 1163"><i>Non-residential (SAP 10.2 emission factors)</i></th> </tr> <tr> <th data-bbox="501 1163 801 1315"></th> <th data-bbox="801 1163 1102 1315">Total regulated emissions (Tonnes CO₂ / year)</th> <th data-bbox="1102 1163 1402 1315">CO₂ savings (Tonnes CO₂ / year)</th> <th data-bbox="1402 1163 1702 1315">Percentage savings (%)</th> </tr> </thead> <tbody> <tr> <td data-bbox="501 1315 801 1382">Part L 2021 baseline</td> <td data-bbox="801 1315 1102 1382">12.8</td> <td data-bbox="1102 1315 1402 1382"></td> <td data-bbox="1402 1315 1702 1382"></td> </tr> </tbody> </table>	<i>Non-residential (SAP 10.2 emission factors)</i>					Total regulated emissions (Tonnes CO₂ / year)	CO₂ savings (Tonnes CO₂ / year)	Percentage savings (%)	Part L 2021 baseline	12.8			Recommended conditions and s106 heads of terms included.
<i>Non-residential (SAP 10.2 emission factors)</i>														
	Total regulated emissions (Tonnes CO₂ / year)	CO₂ savings (Tonnes CO₂ / year)	Percentage savings (%)											
Part L 2021 baseline	12.8													

Be Lean	10.8	1.9	15%
Be Clean	10.8	0.0	0%
Be Green	7.3	3.5	27%
Cumulative savings		5.4	43%
Carbon shortfall to offset (tCO₂)	7.3		
Carbon offset contribution	£95 x 30 years x 7.3 tCO ₂ /year = £20,805		
10% management fee	£2,080.5		

Actions:

- Please model the commercial use separate for the warehouse living accommodation use in BRUKL. Please also set out the separate assumptions for the baseline for those two types of uses: fabric, ventilation, heating, occupation, water requirements.
- Please submit BRUKL sheets for BOTH uses for the Be Lean and Be Green scenarios.

Energy Use Intensity / Space Heating Demand

Building type	EUI (kWh/m²/year)	Space Heating Demand (kWh/m²/year)	Methodology used
Site-wide	39.26	18.96	

Actions:

- Please provide the Energy Use Intensity for commercial and warehouse living accommodation parts of the development separately.

Energy – Lean

The applicant has proposed a saving of 1.9 tCO₂ in carbon emissions (15%) through improved energy efficiency standards in key elements of the build, based on SAP10.2 carbon factors.

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

	Warehouse Living Accommodation	Commercial/Workspace
Floor u-value	0.10 W/m ² K	
External wall u-value	0.15 W/m ² K	
Roof u-value	0.10 W/m ² K	
Door u-value	1.20 W/m ² K	
Window u-value	1.20 W/m ² K	
G-value	0.40	
Personnel doors	1.6 W/m ² K	
Air permeability rate	3 m ³ /hm ² @ 50Pa	
Heating System (Be Green)	Air source heat pumps providing 100% of heating (and cooling); SCoP 280%, SEER 4.4	Air source heat pumps providing 100% of heating (and cooling); SCoP 264%, SEER 4.4
Waste Water Heat recovery?	No	No
Thermal bridging	Default Values	Default Values
Low energy lighting	Yes	Yes
Thermal mass	Medium weight	Medium weight

Actions:

- Submit the individual end use BER for specific end users in line w CIBSE Guide F.

Overheating is dealt with in more detail below.

Energy – Clean

The plant room layout includes pumps for district heating circuit and two buffer vessels for district heating system (1500 X 1500 base per vessel). However, more details are required including the connection point at the edge of the site, location of the connecting pipe, and other schematics.

Actions:

- Please submit a site plan showing the connection point at the edge of the site, location of a pipe between the connection point and plant room, and plant room size, layout and schematics according to the standards.

Energy – Green

As part of the Be Green carbon reductions, all new developments must achieve a minimum reduction of 20% from on-site renewable energy generation to comply with Policy SP4.

The revised report concludes that air source heat pumps (ASHPs) and solar photovoltaic (PV) panels are the most viable options to deliver the Be Green requirement. A total of 3.5 tCO₂ (27%) reduction of emissions are proposed under Be Green measures.

Block A and Block B has been identified suitable for PV installation; however, no Solar PV has been proposed in Block B as a Biodiversity meadow mix has been proposed in this space.

The solar array peak output would be 8kWp, which is estimated to produce around 25,500 kWh/year of renewable electricity per year. The solar PV will be installed on the roof of Block A with an area of 131m² oriented south-east and south-west with 35° inclination.

The PV array is proposed to connect to the landlord electricity distribution and will be monitored with a meter installed in accordance with Building Regulations and the Be Seen energy monitoring guidance. The meter is proposed to be connected to the BEMS for continuous monitoring of the electricity generated.

Actions:

- London Plan Policy SI2: Be Green requires development to maximise the opportunity for renewable energy generation on site and the Local Plan Policy SP4 requires all new development to achieve a minimum 20% reduction from on-site renewable energy generation. Therefore,
 - o It is recommended to explore the option of Bio-solar roof for Block B benefitting both on site renewable energy generation and biodiversity enhancement. This will maximise the possible renewable energy generation on-site as required by Policy SI2 and SP4.

Energy – Be Seen

No further comments.

Actions:

- 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>)

2. Carbon Offset Contribution

An indicative carbon shortfall of 7.3 tCO₂/year remains. The carbon offset contribution will be recalculated according to the revised energy statement. The remaining carbon emissions will need to be offset at £95/tCO₂ over 30 years.

3. Overheating

In accordance with the Energy Assessment Guidance, the applicant has undertaken a dynamic thermal modelling assessment in line with CIBSE TM59 with TM49 weather files. The report has modelled 101 bedrooms, 4 living rooms, 4 kitchen and 9 living/kitchen under the London Weather Centre weather files following the cooling hierarchy.

Due to the noise and air quality constraints of this site being adjacent to the busy Seven Sisters Road, the TM59 criteria for predominantly mechanically ventilated dwellings should apply (assuming windows need to remain closed).

The following scenarios were modelled:

1. **Baseline:** solar control glazing with a g-value of 0.4, no blinds, windows fully open during the day, night-time opening restricted to bedrooms in line with acousticians' specification, minimum ventilation rates for fresh air.
2. **Mitigation 1:** baseline with increased ventilation rate to 4ach to bedrooms at night to improve sleeping condition and naturally ventilated living rooms and kitchens.
3. **Mitigation 2:** baseline with comfort cooling limited to 35W/m² to bedrooms (predominantly mechanically ventilated dwellings) and naturally ventilated living rooms and kitchens.

Results are listed in the table below.

	TM59 – criterion A (<3% hours of overheating)	TM59 – criterion B hours >26°C (pass <33 hours)	Criterion 3: Fixed temperature test (predominantly mechanically ventilated)
Baseline: DSY1 2020s	118/118	0/101	
Mitigation 1:	118/118	0/101	

DSY1 2020s			
Mitigation 2: DSY1 2020s	17/17	-	101/101
DSY2 2020s	17/17	-	101/101
DSY3 2020s	0/17	-	101/101
DSY1 2050s	9/17	-	101/101
DSY2 2050s	0/17	-	101/101
DSY3 2050s	0/17	-	101/101
DSY1 2080s	0/17	-	101/101
DSY2 2080s	0/17	-	101/101
DSY3 2080s	0/17	-	101/101

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

- Restricted windows opening: 3% of the room floor area for windows facing south and 11% of the room floor area for windows facing north;
- Glazing g-value of 0.4, LT 60-70% and frame factor of 15%;
- Window recess 200mm deep;
- Horizontal brise soleil 600mm to all south facing bedrooms windows;
- Communal living room and kitchens have a set-back to the south elevation and projecting balconies;
- MVHR with 15 l/s for 1bed dwellings and 30 l/s for kitchen/living room spaces.

- Comfort cooling limited to 35W/m² for bedrooms only.

Overheating Actions:

- Please undertake the modelling of commercial spaces, if the proposed uses are not yet clear, this aspect can be conditioned to ensure that the modelling is based on the potential future occupier.
- For the shading strategy, include: technical specification and images of the proposed shading feature (e.g. overhangs, Brise Soleil), 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).
- Will comfort cooling be provided to all 101 bedrooms? Please specify the active cooling demand (space cooling, not energy used) on an area-weighted average in MJ/m² and MY/year? Please also confirm the efficiency of the equipment, whether the air is sourced from the coolest point / any renewable sources.
- 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.

4. Sustainability

No further comments.

5. Planning Obligations Heads of Terms

- Be Seen commitment to uploading energy data
- Energy Plan to recalculate the performance at commencement
- Sustainability review to confirm the performance prior to occupation

- Indicative carbon offset contribution (and associated obligations) of £20,805, plus a 10% management fee; an indicative carbon offset contribution to be re-calculated at £2,850 per tCO2 at the Energy Plan stage with a 50% payment prior to implementation, and actual carbon offset contribution calculation at Sustainability Review stage following completion and payment for the remaining amount due prior to occupation.
- DEN connection (and associated obligations) if this becomes available within the next 10 years.

6. Planning Conditions

Energy strategy

The development hereby approved shall be constructed in accordance with the Energy Statement prepared by Expedition (dated 27 Oct 2023), delivering a minimum 43% improvement on carbon emissions over 2021 Building Regulations Part L, with SAP10.2 emission factors, high fabric efficiencies, air source heat pumps (ASHPs) and a minimum 8kWp 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 15% 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 ASHPs pipework and noise and visual mitigation measures;*
- *Specification and efficiency of the proposed Mechanical Ventilation and Heat Recovery (MVHR), with plans showing the rigid MVHR ducting and location of the unit;*

- *Details of the PV, demonstrating the roof area has been maximised, with the following details: a roof plan; the number, angle, orientation, type, and efficiency level of the PVs; how overheating of the panels will be minimised; their peak output (kWp); and how the energy will be used on-site before exporting to the grid;*
- *Specification of any additional equipment installed to reduce carbon emissions;*

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

(b) The solar PV arrays and air source heat pumps 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.

DEN

Prior to the above ground commencement of construction work, details relating to the future connection to the DEN must be submitted to and approved by the local planning authority. This shall include:

- *Further detail of how the developer will ensure the performance of the DEN system will be safeguarded through later stages of design (e.g. value engineering proposals by installers), construction and commissioning including provision of key information on system performance required by CoP1 (e.g. joint weld and HIU commissioning certificates, CoP1 checklists, etc.);*
- *Peak heat load calculations in accordance with CIBSE CP1 Heat Networks: Code of Practice for the UK (2020) taking account of diversification.*
- *Detail of the pipe design, pipe sizes and lengths (taking account of flow and return temperatures and diversification), insulation and calculated heat loss from the pipes in Watts, demonstrating heat losses have been minimised together with analysis of stress/expansion;*
- *A before and after floor plan showing how the plant room can accommodate a heat substation for future DEN connection. The heat substation shall be sized to meet the peak heat load of the site. The drawings should cover details of the phasing including any plant that needs to be removed or relocated and access routes for installation of the heat substation;*
- *Details of the route for the primary pipework from the energy centre to a point of connection at the site boundary including evidence that the point of connection is accessible by the area wide DEN, detailed proposals for installation for the route that shall be coordinated with existing and services, and plans and sections showing the route for three 100mm diameter communications ducts;*
- *Details of the location for building entry including dimensions, isolation points, coordination with existing services and detail of flushing/seals;*
- *Details of the location for the set down of a temporary plant to provide heat to the development in case of an interruption to the DEN supply including confirmation that the structural load bearing of the temporary boiler location is adequate for the temporary plant and identify the area/route available for a flue;*
- *Details of a future pipework route from the temporary boiler location to the plant room.*

Reason: To ensure the development reduces its impact on climate change by reducing carbon emissions on site in compliance with the Energy Hierarchy, and in line with

London Plan (2021) Policy SI2 and SI3, and Local Plan (2017) Policies SP4 and DM22.

Metering strategy

Prior to the completion of the superstructure a quality assured metering plan, shall be submitted to and approved by the Local Planning Authority, this shall include:

- (a) relevant smart metering schematics for the individual Dwellings, commercial units, landlord areas, plant/energy centre area(s);*
- (b) information on third-party quality assurance mechanisms for the metering installation that follow industry best practice at the time of submission;*
- (c) correct calibration and operation that will measure and report the required data for each reportable unit in line with the Be Seen guidance, including metering information for the building energy consumption, energy centre performance, utility meters, renewable energy generation, battery storage and electric vehicle technologies, and exported energy.*

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.

Overheating (Warehouse living)

Prior to occupation of the development, details of external/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.

*The following overheating measures must be installed prior to occupation and be retained for the lifetime of the development to reduce the risk of overheating in habitable rooms in line with the *the Overheating Assessment from the Energy Statement Appendix C prepared by Expedition (dated 14 December 2022)*:*

- Internal blinds to all habitable rooms;
- Restricted windows opening: 3% of the room floor area for windows facing south and 11% of the room floor area for windows facing north;
- Glazing g-value of 0.4, LT 60-70% and frame factor of 15%;
- Window recess 200mm deep;
- Horizontal brise soleil 600mm to all south facing bedrooms windows;
- Communal living room and kitchens have a set-back to the south elevation and projecting balconies;
- MVHR with 15 l/s for 1bed dwellings and 30 l/s for kitchen/living room spaces.
- Comfort cooling limited to 35W/m² for bedrooms
- Hot water pipes insulated to high standards with maximum heat losses as modelled;

If the design of Block is amended, or the heat network pipes will result in higher heat losses and will impact on the overheating risk of any units, a revised Overheating Strategy must be submitted as part of the amendment application.

Reason: In the interest of reducing the impacts of climate change and mitigation of overheating risk, in accordance with London Plan (2021) Policy SI4, and Local Plan (2017) Policies SP4 and DM21.

Overheating (Commercial)

At least six months prior to the occupation of each non-residential area, an Overheating Report must be submitted to and approved by the Local Planning Authority if that space is to be occupied for an extended period of time or will accommodate any vulnerable users, such as office/workspace, community, healthcare, or educational uses.

The report shall be based on the current and future weather files for 2020s, 2050s and 2080s for the CIBSE TM49 central London dataset. It shall set out:

- *The proposed occupancy profiles and heat gains in line with CIBSE TM52*

- *The modelled mitigation measures which will be delivered to ensure the development complies with DSY1 for the 2020s weather file.*
- *A retrofit plan that demonstrates which mitigation measures would be required to pass future weather files, with confirmation that the retrofit measures can be integrated within the design.*

The mitigation measures hereby approved shall be implemented prior to occupation and retained thereafter for the lifetime of the development.

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

Building User Guide

Prior to occupation, a Building User Guide for new residential occupants shall be submitted in writing to and for approval by the Local Planning Authority. The Building User Guide will advise residents how to operate their property during a heatwave, setting out a cooling hierarchy in accordance with London Plan (2021) Policy SI4 with passive measures being considered ahead of cooling systems for different heatwave scenarios. The Building User Guide should be easy to understand, and will be issued to any residential occupants before they move in, and should be kept online for residents to refer to easily.

Reason: In the interest of reducing the impacts of climate change and mitigation of overheating risk, in accordance with London Plan (2021) Policy SI4, and Local Plan (2017) Policies SP4 and DM21.

BREEAM Excellent Certificate

a) Prior to commencement of above ground works, a design stage accreditation certificates for every type of non-residential category must be submitted to the Local Planning Authority confirming that the development will achieve a BREEAM “Very

Good” outcome (or equivalent), aiming for “Excellent”. This should be accompanied by a tracker demonstrating which credits are being targeted, and why other credits cannot be met on site.

The development shall then be constructed in strict accordance with the details so approved, shall achieve the agreed rating and shall be maintained as such thereafter for the lifetime of the development.

(b) Prior to occupation, a post-construction certificate issued by the Building Research Establishment must be submitted to the local authority for approval, confirming this standard has been achieved.

In the event that the development fails to achieve the agreed rating for the development, a full schedule and costings of remedial works required to achieve this rating shall be submitted for our written approval with 2 months of the submission of the post construction certificate. Thereafter the schedule of remedial works must be implemented on site within 3 months of the Local Authority’s approval of the schedule, or the full costs and management fees given to the Council for offsite remedial actions.

Reason: In the interest of addressing climate change and securing sustainable development in accordance with London Plan (2021) Policies SI2, SI3 and SI4, and Local Plan (2017) Policies SP4 and DM21.

Living roofs

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

i) A roof plan identifying where the living roofs will be located;

ii) A section demonstrating settled substrate levels of no less than 120mm for extensive living roofs (varying depths of 120-180mm), and no less than 250mm for intensive living roofs (including planters on amenity roof terraces);

iii) Roof plans annotating details of the substrate: showing at least two substrate types across the roofs, annotating contours of the varying depths of substrate

iv) Details of the proposed type of invertebrate habitat structures with a minimum of one feature per 30m² of living roof: substrate mounds and 0.5m high sandy piles in areas with the greatest structural support to provide a variation in habitat; semi-buried log piles / flat stones for invertebrates with a minimum footprint of 1m², rope coils, pebble mounds of water trays;

v) Details on the range and seed spread of native species of (wild)flowers and herbs (minimum 10g/m²) and density of plug plants planted (minimum 20/m² with root ball of plugs 25cm³) to benefit native wildlife, suitable for the amount of direct sunshine/shading of the different living roof spaces. The living roofs will not rely on one species of plant life such as Sedum (which are not native);

vi) Roof plans and sections showing the relationship between the living roof areas and photovoltaic array; and

vii) Management and maintenance plan, including frequency of watering arrangements.

viii) A section showing the build-up of the blue roofs and confirmation of the water attenuation properties, and feasibility of collecting the rainwater and using this on site;

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

Reason: To ensure that the development provides the maximum provision towards the creation of habitats for biodiversity and supports the water retention on site during

rainfall. In accordance with London Plan (2021) Policies G1, G5, G6, SI1 and SI2 and Local Plan (2017) Policies SP4, SP5, SP11 and SP13.

Biodiversity

(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.

Urban Greening Factor

Prior to completion of the construction work, an Urban Greening Factor calculation should be submitted to and approved by the Local Planning Authority demonstrating a target factor of 0.35 has been met through greening measures.

Reason: To ensure that the development provides the maximum provision towards the urban greening of the local environment, creation of habitats for biodiversity and the mitigation and adaptation of climate change. In accordance with London Plan (2021) Policies G1, G5, G6, SI1 and SI2 and Local Plan (2017) Policies SP4, SP5, SP11 and SP13.

Carbon Management Response 08/08/2023

In preparing this consultation response, we have reviewed:

- Energy Statement prepared by Expedition (dated 14 December 2022), including Overheating Assessment
- Sustainability Statement prepared by Expedition (dated 14 December 2022), including a BREEAM Pre-Assessment
- Circular Economy Statement prepared by Expedition (dated 14 December 2022)
- Relevant supporting documents.

1. Summary

The development achieves a reduction of 53% carbon dioxide emissions on site against Part L 2021, however, the u-values proposed in the report is inconsistent with the ones used for energy modelling which is unacceptable. Furthermore, the overheating assessment is very high level, and the modelled rooms/spaces does not represent the overheating risks for all rooms/spaces of the development.

Carbon Management cannot currently support this application. The development does not currently meet

- London Plan Policy SI4 and Local Plan DM21: insufficient dynamic thermal modelling was undertaken to adequately assess the overheating risk, mitigate the risk and reduce the impact on the urban heat island.

Further information needs to be provided to address this objection, in relation to the Energy Strategy and Overheating Strategy. This should be addressed prior to the determination of the application.

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 CO₂ emissions for the development shows an improvement of approximately 53% 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 5.1 tonnes of CO₂ from a baseline of 9.7 tCO₂/year.

London Plan Policy SI2 requires major development proposals to calculate and minimise unregulated carbon emissions, not covered by Building Regulations. The calculated unregulated emissions are: 5.5 tCO₂.

<i>Non-residential (SAP 10.2 emission factors)</i>			
	Total regulated emissions (Tonnes CO₂ / year)	CO₂ savings (Tonnes CO₂ / year)	Percentage savings (%)
Part L 2021 baseline	9.7		
Be Lean	7.1	2.6	27%
Be Clean	7.1	0.0	0%
Be Green	4.6	2.5	26%
Cumulative savings		5.1	53%

Carbon shortfall to offset (tCO₂)	4.6		
Carbon offset contribution	£95 x 30 years x 4.6 tCO ₂ /year = £13,110		
10% management fee	£1,311		

Actions:

- Model the commercial use separate from the warehouse living accommodation use in BRUKL. Please also set out the separate assumptions for the baseline for those two types of uses: fabric, ventilation, heating, occupation, water requirements.
- The energy statement does not include the GLA Carbon emissions reporting spreadsheet (Appendix D). Please submit the GLA's Carbon Emission Reporting Spreadsheet.
- Please submit BRUKL sheets for the two uses for the Baseline, Be Lean and Be Green scenarios.
- What is the calculated Primary Energy Factor?
- The Energy Statement does not include the plant room layout (Appendix C).

Energy Use Intensity / Space Heating Demand

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

Building type	EUI (kWh/m²/year)	Space Heating Demand (kWh/m²/year)	Methodology used
Site-wide	34.8	17.5	

Actions:

- Please provide the Energy Use Intensity for commercial and warehouse living accommodation parts of the development. How does this perform against GLA benchmarks, i.e. at 55 kWh/m²/year for non-residential (office/hotel)? Please submit the information in line with the GLA's reporting template.

Energy – Lean

The applicant has proposed a saving of 2.6 tCO₂ in carbon emissions (27%) through improved energy efficiency standards in key elements of the build, based on SA10.2 carbon factors. This goes beyond the minimum 10% and 15% reduction respectively for residential and non-residential part of the development as set in London Plan Policy S12, so this is supported. However, the applicant is required to share the carbon reduction values for residential and non-residential part of the development.

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

Floor u-value	0.10 W/m ² K
External wall u-value	0.15 W/m ² K
Roof u-value	0.10 W/m ² K
Door u-value	1.20 W/m ² K
Window u-value	1.20 W/m ² K
G-value	0.40
Air permeability rate	3 m ³ /hm ² @ 50Pa
Ventilation strategy	Mechanical ventilation with heat recovery (MVHR % efficiency; 0. W/l/s Specific Fan Power) Natural ventilation
Waste Water Heat recovery?	TBC
Thermal bridging	TBC
Low energy lighting	Yes

Heating system (efficiency / emitter)	TBC
Thermal mass	TBC
Improvement from the target fabric energy efficiency (TFEE)	TBC

Actions:

- Please specify the heating strategy and ventilation system assumed under the Baseline and Be Lean scenarios (including the gross efficiency figure(s)). 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.
- The proposed u-value for floor is 0.10 W/m²K and for external wall is 0.15 W/m²K, while the value in the BRUKL report is 0.2 W/m²K for floor and 0.10 W/m²K for wall. The u-values are inconsistent in the report and BRUKL sheet. Please amend these and re-resubmit the BRUKL sheets.
- Please identify on a plan where the MVHR units will be located within the warehouse living units. The units should be less than 2m away from external walls. This detail can also be conditioned.
- What is the proportion of glazed area? Consider following the LETI Climate Emergency Design Guide principles in façade design.
- Set out how the scheme's thermal bridging will be reduced.
- What is the construction of the building and what is the assumed thermal mass?
- Submit the individual end use BER for specific end users in line w CIBSE Guide F.

Overheating is dealt with in more detail below.

Energy – Clean

London Plan Policy SI3 calls for major development in Heat Network Priority Areas to have a communal low-temperature heating system, with the heat source selected from a hierarchy of options (with connecting to a local existing or planned heat network at

the top). Policy DM22 of the Development Management Document supports proposals that contribute to the provision and use of Decentralised Energy Network (DEN) infrastructure. It requires developments incorporating site-wide communal energy systems to examine opportunities to extend these systems beyond the site boundary to supply energy to neighbouring existing and planned future developments. It requires developments to prioritise connection to existing or planned future DENs.

The Be Clean strategy to connect to the DEN in Woodberry Down is generally acceptable. Some evidence should be provided that the DEN system was inputted into the SAP model and that the plant room is adequately sized for a substation.

The applicant will need to demonstrate that they will provide the following details prior to the commencement of construction:

- a) Buried pipe (dry and filled with nitrogen) to our specification from the GF plant room to a manhole at the boundary of their site and evidence of any obstructions in highway adjacent to connection point;
- b) A good quality network within the building – 60/40 F&R, <50W/dwelling losses from the network – ideally to an agreed standard in the S106;
- c) A clear plan for QA of the network post-design approval through to operation, based on CP1;
- d) A clear commercial strategy identifying who will sell energy to residents and how prices/quality of service will be set.

Energy – Green

As part of the Be Green carbon reductions, all new developments must achieve a minimum reduction of 20% from on-site renewable energy generation to comply with Policy SP4.

The application has reviewed the installation of various renewable technologies. The report concludes that air source heat pumps (ASHPs) and solar photovoltaic (PV)

panels are the most viable options to deliver the Be Green requirement. A total of 2.5 tCO₂ (26%) reduction of emissions are proposed under Be Green measures.

The solar array peak output would be 8kWp, which is estimated to produce around 390kWh/year of renewable electricity per year.

Actions:

- Please provide some commentary on how the available roof space has been maximised to install solar PV. Has your feasibility shown that other roofs will not be viable / will they be used for other purposes?
- How much of the roof area will be covered approximately, what is the assumed efficiency, angle and orientation of the panels?
- A living roof should be installed under the solar PV, or if this is not feasible, the roof should be light coloured to reduce solar heat gains and the improve efficiency of the solar panels.
- How much of the heating/hot water demand will be met by the proposed types of heat pumps? If this cannot be met fully, how will this be supplemented?
- What is the Seasonal Coefficient of Performance (SCOP), the Seasonal Performance Factor (SFP) and Seasonal Energy Efficiency ratio (SEER) of the ASHP?

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 unit. A public display of energy usage and generation should also be provided in the main entrance area to raise awareness of residents/businesses.

The applicant proposes the development to incorporate energy and smart meter in line with the GLA's Energy Monitoring Guidance and the sub-metering strategy will be developed during the detailed design stages. A building energy management system (BEMS) is proposed to operate, control and monitor the mechanical service installation. Comprehensive metering is proposed for performance and load monitoring of the complete systems, with the capacity to monitoring individual items of plants, low carbon technologies and district heating system.

Actions:

- 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

An indicative carbon shortfall of 4.6 tCO₂/year remains. The carbon offset contribution will be recalculated according to the revised energy statement. The remaining carbon emissions will need to be offset at £95/tCO₂ over 30 years.

4. Overheating

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

In accordance with the Energy Assessment Guidance, the applicant has undertaken a dynamic thermal modelling assessment in line with CIBSE TM59 with TM49 weather files. The report has modelled one habitable room and one living space from each block (3rd floor of west block and 6th floor of east block) under the London Heathrow files.

Due to the noise and air quality constraints of this site being adjacent to the busy Seven Sisters Road, the TM59 criteria for predominantly mechanically ventilated dwellings should apply (assuming windows need to remain closed), although this has not been addressed.

Results are listed in the table below.

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

DSY2 2080s					
DSY3 2080s					

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

- Natural ventilation, with openable side-hung windows
- Glazing g-value of 0.4
- Self-shading with balcony and overhangs.
- MVHR with 13 l/s for 1bed dwellings and 60 l/s for kitchen/living room spaces.
- No active cooling

The submitted overheating strategy is very high level and is not acceptable. TM49 weather files for the London Weather Centre should be used. The selected rooms and spaces for overheating assessment does not represent the overheating risks for all rooms/spaces of the development.

Overheating Actions:

- Redo the overheating modelling with the Central London weather file, 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:
 - o Baseline Scenario
 - o Baseline Scenario + mitigation measure 1 i.e external shading
 - o Baseline scenario + mitigation measure 1 + mitigation measure 2, etc
- Report the results in a table that is colour coded and clearly sets out the maximum hours above criteria A and B to pass the requirement, and a summary of the number of rooms that pass.

	<ul style="list-style-type: none">- Demonstrate the cooling hierarchy has been followed, and specify which overheating mitigation measures are proposed to reduce the overheating risk within the proposed design:<ul style="list-style-type: none">o Internal heat generation, i.e. heat distribution infrastructureo Heat entering building, i.e. shutters, trees, vegetation, blindso Manage heat through thermal mass and high ceilingso Passive ventilation, i.e. openable windows, shallow floorplates, dual aspect, stack effecto Mechanical ventilation, i.e. free cooling from outside air in shade, by-pass for summer mode- For the shading strategy, include: 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).- 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.- The habitable rooms facing the busy Seven Sisters road are subject to adverse noise or air pollution. Specify the strategy to overcome any risk of crime or adverse air/noise pollution that will impact whether occupants can rely on natural ventilation, in line with the AVO Residential Design Guide. This should include specification of adapted windows and elevations demonstrating where these will be installed.- Include images indicating which sample dwellings were modelled and floorplans showing the modelled internal layout of dwellings.- Undertake further modelling:<ul style="list-style-type: none">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	
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	<p>pass these more extreme and future weather files as far as feasible. Any remaining overheating risk should inform the future retrofit plan.</p> <ul style="list-style-type: none">○ All single-aspect rooms facing west, east, and south;○ At least 50% of rooms on the top floor;○ 75% of all modelled rooms facing South or South/West;○ 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 <u>AVO Residential Design Guide</u>);○ Habitable communal spaces (e.g. communal living/dining rooms in care homes);○ Communal corridors, where pipework runs through;○ Commercial/office areas, particularly where they will be occupied for a longer period of time. Assuming that active cooling will be provided is not sufficient. If the proposed uses are not yet clear, this aspect can be conditioned to ensure that the modelling is based on the potential future occupiers.; <ul style="list-style-type: none">- Specify the active cooling demand (space cooling, not energy used) on an area-weighted average in MJ/m² 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.	
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- Confirm who will own the overheating risk when the building is occupied (not the residents).
- This development should have a heatwave plan / building user guide to mitigate overheating risk for occupants.

5. Sustainability

Policy DM21 of the Development Management Document requires developments to demonstrate sustainable design, layout and construction techniques. The sustainability section in the report sets out the proposed measures to improve the sustainability of the scheme, including Energy and Carbon, Materials and Circular Economy, Environmental resilience, health and wellbeing, water consumption, flood risk and drainage, biodiversity, climate resilience, and landscape design.

Action:

- What electric vehicle charging points are proposed? This allows the futureproofing of the dwelling/development by ensuring the required power has been installed.

Non-Domestic BREEAM Requirement

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

The applicant has also prepared a BREEAM Pre-Assessment Report for the development, assessed as a Student Accommodation use (Shell & Core). Based on this report, a score of 72.4% is expected to be achieved, equivalent to 'Excellent' rating. A potential score of 74.1% could be achieved.

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 0.36, which is below the minimum target of 0.4 for residential developments in London Plan Policy G5. The applicant has also undertaken an indicative UGF assessment for the wider masterplan, which would be predominantly non-residential, and currently achieve a value of 0.34 against a target of 0.30.

The Biodiversity Net Gain calculation shows a net gain of 377.8%, which is above the 10% requirement as set out in the Environment Act 2021. This would be achieved through a mixture of shrubs, rain garden, scattered trees, wildflower turfs, and green living roofs. It is noted that there would be a 99% loss of hedgerow habitats.

Actions:

- The development should maximise urban greening opportunities and demonstrate further how 0.4 can be achieved or justify how other options have been explored.
- The development should seek further replacement of the existing hedgerow at different levels, to maximise the reprovion of this lost habitat for foraging and nesting. This would not be replicated appropriately through living roofs and trees.

Living roofs and walls

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, planters and food growing areas) to ensure most plant species can establish and thrive and can withstand periods of drought. The living roof should include a mixture of seeds and plug plants.

Not much detail has been provided for the living walls, which are intended to be delivered for many of the blank walls along the building or pedestrian route.

Actions:

- Living roofs are supported in principle, subject to detailed design and ensuring that the substrate depth is increased at detailed design stage. Details for living roofs will need to be submitted as part of a planning condition.
- Please submit a plan showing where the living walls will be delivered, that these will be rooted in the ground, what plants are proposed, and how the plants will be supported.

Circular Economy

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

Reference has been made to integrate circular economy principles within the proposed development, which is supported in principle.

A range of design measures and commitment have been proposed, including:

- Resource conservation – the design team will continuously review material efficiency strategies across design stages to ensure a lean design that reduces material quantities without inhibiting future flexibility. At RIBA Stage 2, the construction approach has been closely considered addressing material efficiency, flexibility and embodied carbon.
- Design for adaptability and flexibility – the design considers adaptability, flexibility and potential for expansion, with reference to and strategies focused on all six building layers: site, structure, skin, services, space and stuff.
- Design for disassembly – The proposals consider the (re)use of former shipping containers on the third smaller plot on the east of the slide to create temporary structures which can be easily disassembled and erected elsewhere. Whilst Block A and Block B are designed for a longer lifespan, these still consider their eventual reconfiguration and deconstruction through principles to maximise the potential for high-value reuse of construction materials and elements at the end of the buildings' life. The end-of-life strategy proposes a target of 50% of materials and elements for reuse at the buildings end-of-life.
- Climate change resilience – the development has considered the potential for increasingly severe weather events, in line with climate change projections, and responds to increased risks to overheating, flooding and water scarcity.
- Construction waste management - the development is targeting the diversion of 95% of construction, demolition, and excavation waste from landfill. This will be achieved through management of demolition and excavation waste, as well as the production of a site waste management plan setting out the targets for efficiency and reuse/recycling of materials on and off-site. Pre-demolition audit is not submitted and is proposed to be carried out prior to site works.

The applicant has proposed to continue to review and monitor progress against these principles and targets in the report. The applicant ensures CE principles and requirements to be embedded in all procurement documents, including appointment of contractors.

Action:

	<ul style="list-style-type: none"> - Please submit the pre-demolition audit. This can be conditioned. - Submit an Operational and Waste Management Plan. <p>6. Planning Conditions</p> <p>To be secured (with detailed wording TBC):</p> <ul style="list-style-type: none"> - Energy strategy - Overheating - BREEAM Excellent Certificate - Living roofs and living walls - Circular Economy (Pre-Construction report, Post-Completion report) - Whole-Life Carbon - Biodiversity <p>7. Planning Obligations Heads of Terms</p> <ul style="list-style-type: none"> - Be Seen commitment to uploading energy data - Energy Plan - Sustainability Review - Indicative carbon offset contribution (and associated obligations) of £13,110, plus a 10% management fee; an indicative carbon offset contribution to be re-calculated at £2,850 per tCO2 at the Energy Plan stage with a 50% payment prior to implementation, and actual carbon offset contribution calculation at Sustainability Review stage following completion and payment for the remaining amount due prior to occupation. - DEN connection (and associated obligations) - Heating strategy fall-back option if not connecting to the DEN 	
LBH Conservation	<p>The application site lies within viewpoints 1, the strategically important view of Central London from Alexandra Palace and view 23, the locally important view of Alexandra Palace from the corner of Seven Sisters Road, Amhurst Park and Eade Road. The site also lies near 13 designated heritage assets and 11 non-designated heritage assets, which are included on a table on page 13 of the THVIA. Alexandra Palace is</p>	<p>Noted. The public benefits of the proposal would outweigh the limited harm to the significance of</p>

	<p>not included in this list, even though the long-range views of the heritage asset are part of how its setting contributes towards its significance and is discussed below alongside the locally significant viewpoints. It is also noted that the locally listed No. 590 (former Weights and Measure Office) Seven Sisters Road would likely have intervisibility with the site.</p> <p><u>Alexandra Palace & views</u> The view southwards from Alexandra Palace towards the City of London is a strategic view and is considered to be sensitive to change. The impact on this view is sufficiently demonstrated and discussed in Representative view 1 in Appendix C. The proposed development would be a visible addition to the skyline but would not mask any landmarks, obstruct part of the vista, and would be read as part of the general built form of the city. While there would be an impact on the view, this would be neutral.</p> <p>In so far as it relates to this application, the architectural form and position of Alexandra Palace (a GII Listed Building) which allows long-range views of the listed building and contributes to the buildings landmark status. This contributes to the building's significance, and many views of Alexandra Palace re considered to be locally important, including view 23 identified in policy DM5, which the development site lies within.</p> <p>View 23 is taken form the corner of Seven Sisters Road, Amhurst Park and Eade Road towards Alexandra Palace. The THVIA states that this view is similar to representative 5, but it is not taken from the same point as that identified in DM9. However, given the sites location in relation to the viewpoint when viewed on site, it is unlikely to obstruct or impinge this view and would have a neutral impact.</p> <p><u>Woodberry Down Community JMI School</u> The school is a GII post war school built as part of the London School Plan in the late 1940s as part of the large-scale estates under construction nearby and is the earliest surviving example. The aspects of the schools setting which contribute to its significance are located on the south side of the river including the estates the school</p>	<p>Woodberry Down Baptist Church.</p>
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was built for. The development site forms part of the wider industrial area to the north of the school. As per the assessment contained in the *supplementary note on heritage effects* does not contribute to the school's significance and would be seen as part of a varied townscape and the development would have a neutral impact on its significance.

Stoke Newington Reservoirs, Filter Beds and New River Conservation Area

The Stoke Newington Reservoirs, Filter Beds and New River Conservation Area is unique and is of great historical importance, relating to the water supply of North London since the seventeenth century and contains historic infrastructure, several of which are listed buildings. The area directly adjacent to the site is the New River which was constructed in the C17 to supply water to north London and is part of the industrial heritage in this part of the city. The existing site does not contribute towards the significance of the conservation area and is seen as part of the wider industrial site. The proposed development would add additional mass and height along the northern boundary to the river, clearly demonstrated in representational view 6. This would be seen in conjunction with the existing taller buildings near Seven Sisters Road and would not harm the significance of the Conservation Area in itself. However, some care would need to be given to development of the wider area going forward to ensure that this does not cumulatively erode the open character of the north bank of the New River and views towards Alexandra Palace are not obscured.

Maynards Sweet Factory

Maynards Sweet Factory is a locally listed building located on the west of the development site and is part of the wider warehouse district. The historic similar land use and the low-level form of the area which allows an appreciation of the chimney as a prominent feature are important aspects of its setting. However, beyond these characteristics, the locally listed building is not sensitive to change to development within its setting. As the existing chimney would remain a prominent feature, the proposed development would have a neutral impact on the significance of the Maynards Sweet Factory

	<p><u>Woodberry Down Baptist Church</u> Woodberry Down Baptist Church is a locally listed building and is an attractive late C19 church designed by Paull and Bonella. The church was built in an imposing design and has some local landmark qualities. The church is prominent in several short to medium range views, including Vartry Road where the building terminates the view of the road westwards. Representative view 4 demonstrates the impact of the proposed development which given its scale on the skyline, would diminish the prominence and part of the landmark quality of the church. Accordingly, this would be considered to cause some harm to the significance of the non-designated heritage asset.</p> <p>It is noted, contrary to the <i>supplementary note on heritage effects</i> the development at the Woodberry Down Estate would not be seen in the view from Vartry Road.</p> <p><u>No. 590 (former Weights and Measure Office) Seven Sisters Road & 100 Amhurst Park</u> Both 590 Seven Sisters Road and 100 Amhurst Park have intervisibility with the site, however it would be seen as part of the background townscape for both heritage assets. As per the assessment contained in the <i>supplementary note on heritage effects</i> does not contribute to either of the locally listed buildings' significance and would be seen as part of a varied townscape and the development would have a neutral impact on its significance.</p> <p><u>Summary</u> Overall, the proposed development would have a neutral impact on the significance of the designated heritage assets, and the majority of the non-designated heritage assets, for which the site forms part of their setting. However, it is considered that there would be some harm to the significance of Woodberry Down Baptist Church as it would diminish the prominence and part of the landmark quality of the locally listed building and should be considered in line with paragraph 203 of the NPPF and policy DM9.</p>	
LBH Design Officer	<p>HGY/2023/0728 – 341a Seven Sisters Rd., London N15 6RD <i>Construction of two new buildings to provide new warehouse living accommodation (Sui Generis (warehouse living)), ground floor café/ workspace (Use Class E) and</i></p>	Comments noted.

associated waste collection and cycle parking. Erection of 10 stacked shipping containers (two storeys) to provide workspace/ artist studios (Use Class E), toilet facilities and associated waste collection and cycle parking. Landscape and public realm enhancements including the widening of and works to an existing alleyway that connects Seven Sisters and Tewkesbury Road, works to Tewkesbury Road, the creation of rain gardens, greening, seating, signage and artworks and all other associated infrastructure works, including the removal of an existing and the provision of a new substation to service the new development.

Applicant: Provewell
Agent: Jen Ross Consulting
Architects: Morris + Company

Principal of Development

The proposals are for a bold and potentially revolutionary new building, but of a type and use that has been over ten years in development and refinement by the applicant, in close consultation with the Council, including design officers. This is the concept of “Warehouse Living”, where properties are used for a mix of living and workspace, in generally fairly large, semi-communal arrangements, with lofty spaces, and several private bedrooms sharing communal living and home working spaces, often with shared bathrooms and other facilities as well. A great amount of creative customisation has been encouraged, to both interiors and to spaces between buildings, with residents planting and seating animating wherever space is available.

These arose organically in this and similar areas as conversion of existing industrial buildings; some old, others comparatively new and of fairly modern, steel and concrete construction. The concept is described fully in the applicants documents, but can be seen as welcome in planning policy senses, including for the relatively affordable, yet unsubsidised housing created, and for the retention of employment, often in growing creative sectors, notwithstanding that there have also been concerns, particularly over management and poor standards. But the council has consulted extensively with

landlords and residents and arrived at a planning policy acceptance of well managed Warehouse Living provided standards are restored and maintained, enshrined in the site allocations for this area, including SA34 covering most of this site, and Development Management policy DM39. As a form of living and working, it also seems to be growing in popularity.

This applicant, Provewell, are one of the main Warehouse Living landlords in this area, and have come to a greater understanding of and belief in the concept, including the realisation that if the tenure form is to survive and thrive, it cannot just be cannibalising existing industrial buildings, but must also involve new , purpose designed Warehouse Living buildings. This application is the first major purpose built Warehouse Living block in the district, and has the potential to be an exemplar of new build Warehouse Living. The application is considered to be fully in accordance with policy DM39, including an agreed masterplan for the whole site allocation. Provewell have accordingly, with a dedicated team of consultant, prepared and continued to evolve a highly detailed masterplan for this site allocation starting several years before this application, from the time of consultations on Haringey's Local Plan (adopted 2017), initially for of their existing building stock, but have spent several years designing and in pre-application discussions with the council on this and one other possible new build site within the site allocation, before refining the proposals for this site, to what we now see.

Location

The area that has come to become known as “The Warehouse District” covers two close by but separate areas of industrial or former industrial uses in the south of Haringay, between Green Lanes and Seven Sisters Road to their east and west, the Gospel Oak to Barking railway and New River north to south, but split by and distinguished from the residential street of Hermitage Road and not including other streets originally built as residential. This site allocation, almost all of which is believed to be in Provewell's ownership, forms about half of the industrial area south of the

residential houses along Hermitage Road; planning designations for the rest of the industrial area are for it to remain solely in employment use.

Most of the industrial area consists of low rise, 2-4 storey, inter-war and early post-war buildings, in large plots, with private alleyways and courtyard spaces between them, with comparatively few public streets through the area. Part of the applicants' masterplan is to open up the spaces between the buildings to create greater urban permeability, in a series of semi-private, pedestrian friendly walkways and courtyards, accommodating space for light van delivery, servicing and the small amount of car parking needed, but few Warehouse Living residents appear to want car parking; the community being keener on cycling. However, larger spaces, such as this application site, are no longer required for parking or articulated lorry delivery.

The conventional description of the site is that it is roughly triangular in plan, bounded by Eade Road to the south, the footpath steps to the north-east, Eade Road and the footpath meeting Seven Sisters Road at the south-eastern corner, and with further Warehouse Living plots to the north and west. Cara House, a multi-storey (6 storeys) 1960s office/light industrial building now converted to Warehouse Living, eats into the north-west corner of the site and is accessed off a yard to its south, which will be partly built upon in this proposal with the new Warehouse Living block extending along the Eade Road frontage, restoring an active, enclosing street frontage to this currently nebulous street.

The land also slopes up steeply from north to south, rising some 7.5m across this site, with Cara House itself entered two floors below its southern side on its northern side. North-east of the stepped footpath, a long terrace of a late Victorian shopping parade fronts Seven Sisters Road, with shops fronting the main road and two floors of flats below. In dark, soot-stained red brick, ornamental facades face Seve Sisters Road and the more blank flank, with just a few, small, secondary windows facing the site, with a more utilitarian rear including a basement now visible due to the slope to the north west, and with very ramshackle, single and two storey industrial buildings at their rear facing Tewkesbury Road, which runs from the foot of the steps north-east,

parallel to the main road. There is a four storey, 1960s, flatted residential block on the south side of Eade Road opposite the site and further residential blocks south of Seven Sisters Road.

This proposal will also act as a gateway marker to the Warehouse District, sited as it is on the only part of the district that actually touches Seven Sisters Road, albeit just at a point. It is therefore appropriate to act as a signpost and shop window to the district, and to house ground floor units that residents whose creative industry is such that they want a shop window for their products. This will also activate the ground floor, animated with retail frontage, which could include interesting, out-of-the-ordinary retail offers, enlivened with pocket public realm spaces and robust landscaping.

This proposal also promises to utterly transform the existing public flight of steps down at least two storeys height from Seven Sisters Road to Tewkesbury Road, from its current foul, stinking, narrow, un-passively-surveilled, rubbish-strewn and unkempt state into an attractive, broader, more broken up, soft landscaped, passively surveilled from the warehouse living above and animated by the active frontage of the corner retail unit at the top of the steps and from the several small workspace units, to be housed in “shipping container” structures either side of the path, forming a secondary courtyard.

Height, Bulk and Massing

As a landmark, “shopwindow” location for the Warehouse District, there is a case for the corner of this proposed development onto Seven Sisters Road meeting the “wayfinder” criterion for a tall or taller building, and this proposal does indeed meet the definition of a tall building, being of ten storeys in total. However, the full height of the proposal will only be visible from the “rear”, north side, on Tewkesbury Road, and within the neighbouring yard spaces, at the bottom of the hill; from the front on Seven Sisters and Eade Roads the lowest two floors will be below ground, and the top floor is set back behind a deep roof terrace, providing a large communal private amenity

space. Thus, the main building of the proposal will be a seven-storey building, from the front, rising to ten storeys at the rear.

Further along the Eade Road frontage, the proposal drops to four storeys, with a narrow gap providing access to Cara Yard and Cara House. This will act as a separate, smaller, warehouse living block, but with the same architectural language, fenestration and materiality, but of a height matching the surroundings. To the rear of the main block, either side of Tewkesbury Yard, a small number of single and two storey shipping container commercial units will sit in the immediate lee of the maximum height. The area of Tewkesbury Road and its yard spaces is already somewhat overshadowed by the effective five and six storey height of the Seven Sisters Road buildings and Cara House, but these small, intimate yard spaces will be even more overshadowed by the ten storeys of the main new building, but these are small scaled, intimate spaces, with lively vibrant street life and animated ground floors, and people's attention is unlikely to be on the more distant view. From further back down Tewkesbury Road it will complete the termination of the vista, but from further back it begins to act beneficially as a landmark and wayfinder of the location of the steps and gateway to the Warehouse District from Seven Sisters Road.

Taking the context out slightly wider, there are several significantly taller buildings up and down Seven Sisters Road a short distance from the site, especially in the Woodberry Down estate just to the south west. This large 1930s council estate of four to twelve storey blocks is currently in the process of being redeveloped at greater density, with genuinely tall buildings amongst the mix, rising to 31 storeys. The estate also crowns the top of the aforementioned hill, higher than the front of the site of this application, and therefore somewhat more distant views of these blocks are even more dominant on the skyline in views from areas just to the north. A range of near and middle distance views of the proposals demonstrate it will sit harmoniously in its gritty industrial context whilst providing a landmark that is still reasonably in harmony with its location on Seven Sisters Road.

Elevational Composition, Materials and Landscaping

The language of elevational composition and materiality chosen is to express the “gritty”, “industrial” character of the proposal and its Warehouse District setting, acting as a sign and gateway to the district from busy Seven Sisters Road. Therefore, a palette based on metal and concrete is used, with exposed fair faced concrete, cementitious board with corrugated patterns referencing the existing industrial buildings, paired with green coloured metal to windows, brises soleil, floor bands, external stairs, roof canopies etc., with lots of testing by the architects, to arrive at the most pleasing combinations of colours and textures.

Both warehouse living buildings share a common ground floor with a more lofty floor to ceiling height and whilst they must house ancillary spaces such as plant, refuse and cycle storage, are designed to maximise both floorspace and frontage in commercial, “shopfront” use. The most robust materials available within the palette are used here; solid concrete masonry, tough metal gates and doors, matching the robust metal to the business units in shipping containers.

The upper floors are laid out rationally, with that expressed in the rigorously elegant fenestration of repeated bedroom windows, banding demarcating floors and corner balconies, with the main corner further emphasised with double height living-working rooms opening onto double height corner balconies. The flank end elevation of the main taller building is further emphasised with use of a quirky round window onto the shared kitchens; the architects have demonstrated the local precedents for and functionality of this feature, but in design terms it can simply be justified as being appropriate on a taller, landmark building marking an important gateway and corner.

Landscaping is an important element of the new and improved public realm created in this proposal, particularly to the widened steps, the entrance “plaza” at the top on Seven Sisters Road and the Tewksbury Yard at the bottom. The steps will feature benches and planting troughs, the plaza and yard spaces trees, planters and further seating to encourage people to stop and dwell, using the commercial units. The semi-private communal yards, Cara Yard providing access to existing Cara House and the

two new warehouse living blocks, and the existing yard to the north of Cara House, will be had paved and hard working but nevertheless provide opportunity for resident greening. |Roofs including to the shipping containers provide further urban greening opportunities, including the green buffer requested by QRP.

Residential Quality, including Space Standards, Privacy, Day and Sunlight

The applicants have carried out extensive studies and research into appropriate residential standards, in consultation with officers and in the absence of local or national room space standards for this sui generis form of accommodation. These are convincing and demonstrate with the expectations of shared communal living and mixing living with working, for a reasonable price residents can acquire spacious, functional living and working accommodation.

The location and the proposed buildings' relationships to their neighbours help it avoid getting into any situations where privacy and overlooking become a concern; it is off set from the existing flats along Seven Sisters Road, the road width of both it and Eade Road give privacy to the flats opposite, the greatest danger would come to other warehouse living, particularly immediate neighbour Cara House, which will be a just about reasonable 15m from the rear bedroom windows of the lower, four storey new block, slightly closer to but at 45° to the taller block. Although greater separation would be preferable, the nature and character of warehouse living probably means less privacy can be expected, and these separations are not far off acceptable distances.

Day and sunlight has been assessed by the applicants' consultants in accordance with the BRE Guide (2021). Thire analysis shows that the significant majority of windows around the site meet the target daylight and sunlight values with the proposal in place. Where this is not the case, the window in question either meets the alternative target value or is obstructed to daylight and sunlight by the architecture of the neighbouring building itself. As such, the daylight and sunlight impact is considered acceptable. Internally, 93% of habitable rooms meet the target daylight value,

	<p>including all living rooms, and all rooms that contain a window that faces within 90° of due south meet the target annual sunlight value.</p> <p>In overshadowing terms, the neighbouring gardens at 347-351 Seven Sisters Road do not meet the target sunlight amenity value in March but are shown to be well sunlit in June and thus are likely to be well sunlit across the summer months when this space is most likely to be in use. It should also be noted that this space is obstructed to sunlight in the existing scenario by the position of 347-351 to the south-east of the space. Overall, given that the BRE Guide is written with suburban development patterns in mind, the day and sunlight achieved is considered very good for a high-density development in a heavily built up area of London.</p> <p><u>Conclusions</u></p> <p>This ambitious proposal could be a revolutionary contribution to providing affordable, effective and vibrant living and working condition as, and help make the Warehouse District a more vibrant and exciting destination, more visible and more able to show itself off and sell its wares. The proposals are nevertheless designed in a rigorous, coherent, logical and hard-edged manner appropriate for a gritty, hard-working location and needs for solidity and durability, softened by moments of joy, greenery and artistic creativity.</p> <p>Regards</p> <p>Richard Truscott Design Officer</p>	
LBH Housing Strategy and Policy	The applicant seeks permission to construct two buildings for new/replacement Warehouse Living accommodation – the applicant proposes 13 new Warehouse Living units, with 4-14 beds per unit. The breakdown proposed taken from pg. 141 <i>Design and Access Statement (DAS)</i> - February 2022 is:	Comments noted.

Block A

- 3 x 14 bed units
- 1 x 12 bed units
- 5 x 5 bed units
- 1 x 4 bed unit

Block B

- 3 x 5 bed units

The units are further broken down:

- 69 (68.35%) bedrooms are for single occupancy
- 21 (20.8%) bedrooms are double occupancy
- 11 (10.9%) of all bedrooms across the site are accessible

The applicant proposes to provide 101 bed spaces, with a projected occupancy of 122 people. Maximum occupancy assumes 30% double occupancy giving rise to maximum occupancy of 133 people.

We welcome the inclusion of accessible units across the single and double bedrooms.

The council's Private Sector Licensing team need to be consulted on these units to establish their compliance with regulatory and legal standards.

In the most up to date document, *The Planning Statement – February 2023* (pg. 17) there appears to be some discrepancy in the figures, the total bed spaces here total 98 not 101, it is indicated that Block B will have x3 5 bed units as opposed to the x3 6 bed units as outlined in the DAS. Further clarification is required.

Affordable Housing

Haringey's Housing Strategy re-states the Local Plan requirement that "development sites with capacity to provide 10 or more units will be required to provide the maximum

amount of affordable housing reasonable” with the borough-wide target that 40% of new housing should be affordable; and that 60% of that affordable housing should be for social rent. Where intermediate housing is provided, the Council has a strong preference for intermediate rent – and especially London Living Rent - over affordable ownership.

No affordable housing is proposed on site. The Housing Strategy and Policy team do not consider the Warehouse Living units – proposed as being let at around £950 a month - as a type of affordable accommodation in spite of the applicant’s statement that they are “mindful that affordability is a key issue” for existing warehouse residents:

- Existing warehouse tenants report that they pay between £550 and £750 per month inclusive of bills.
- For further context, we have compared the proposed rents with recognised affordable tenures London Affordable Rents (LAR) and London Living Rents (LLR). LAR for a self-contained one-bedroom home is currently £731.47 per month inclusive of service charges. LLR for self-contained one-bedroom homes in Seven Sisters is currently £945 per month inclusive of service charges.
- The application does not set out or suggest how rents will increase and further it makes no reference to length of tenure for tenants, security of tenure is important in providing certainty.
- The applicant does not reference bills or service charges. There is no reference in the documents to establishing eligibility to rent the units.

The GLA’s Policy H16 relates to Large-Scale Purpose-Built Shared Living and requires that all such schemes must follow the Viability Tested Route. A financial contribution is expected that is equivalent to 35 per cent of the units, or 50 per cent where the development is on public sector land or industrial land appropriate for residential uses in accordance with Policy E7 Industrial intensification, co-location and substitution. This

	<p>is to be provided at a discount of 50 per cent of the market rent. Where this is provided a scheme will not be subject to a late-stage viability review.</p> <p>As such, we cannot support the application unless the applicant agrees either to provide affordable housing on site that meets the Council’s strategic and policy requirements, or to provide an appropriate financial contribution. An independent financial viability assessment is required to establish that, and further comment from the Housing Strategy and Policy team can then be provided.</p> <p>Updated comments 17/01/2024.</p> <p>It is of course disappointing that there is no provision of affordable housing. We would have expected a scheme of this size to make some contribution towards meeting the pressing needs for genuinely affordable homes: and the lack of affordable housing means that the scheme does not comply with either our existing or emerging housing strategy.</p> <p>However, in light of the particular policy commitments relating to the Warehouse District and of the relatively small size of the surplus that has been identified, we accept that using the entire surplus for affordable workspace is a reasonable decision in policy terms. We accept that this is arguably more impactful than splitting the surplus between affordable workspace and a contribution towards affordable housing.</p>	
<p>LBH Lead Local Flood Authority (LLFA)/Drainage</p>	<p>Having reviewed the applicant’s submitted documents Flood Risk Assessment document reference number 1547-LSL-XX-XXRP-C-FRA, Revision R(01) dated January 2023, Surface Water Drainage Strategy Report reference number 1547-LSL:-XX-XX-RP-C-SWS, Revision R(03) dated January 2023 as prepared by London Structures Lab, along with planning statement and all other relevant drawings and data, we are generally content with the overall methodology as used and mentioned within the above report, subject to following planning conditions to be implemented</p>	<p>Noted that comments have been adequately addressed. Conditions added.</p>

regarding the Surface water Drainage Strategy and its management and maintenance plan.

Surface Water Drainage condition

No development shall take place until a detailed Surface Water Drainage scheme for site has been submitted and approved in writing by the Local Planning Authority. The detailed drainage scheme shall demonstrate:

- a. The diameter of 14mm,16mm & 17mm Online Orifice Outfall from blue roof will imply a higher maintenance to provide efficient control of runoff and possible blockages within the system. The velocity within the pipes are very high and its recommended that these falls are minimised. Also some of the down pipes are during directly into the storage features. You may want to consider trapped gullies at the bottom of the downpipes.
- b. According to the report, the EA flood mapping (3.4) shows surface water flooding in Overbury, Eade and Seven Sisters roads which implies that the existing Thames Water Sewers are overloading. Although, there is no flooding shown within the proposed calculations you may want to bear in mind that the development will be discharging into an already over capacity pipe in some storm situations and therefore you may want to consider NRV or enlargement of the storage system near the outfall to prevent the system 'back up '
- c. As the proposed development will be discharging into the Combine sewer, a confirmation of the allowable rate and point of discharge should be provided from Thames Water.
- d. A maximum design rainfall for 100 year event to the value of 50mm/hr seems to be default setting ? Please use more realistic maximum design rainfall within the calculations.

	<p>Reason : To endure that the principles of Sustainable Drainage are incorporated into this proposal and maintained thereafter.</p> <p><u>Management and Maintenance condition</u></p> <p>Prior to occupation of the development hereby approved, a detailed management maintenance plan for the lifetime of the development, which shall include arrangements for adoption by an appropriate public body or statutory undertaker, management by Residents management company or other arrangements to secure the operation of the drainage scheme throughout the lifetime of the development. The Management Maintenance Schedule shall be constructed in accordance with the approved details and thereafter retained.</p> <p>The maintenance plan should demonstrate :</p> <ul style="list-style-type: none"> e. As a part of weed maintenance for the permeable paving the use of a chemical 'Glyphosate' is banned in European countries and requires EA certification to use in UK. The implication is that this can easily be transferred to water receptors thereby defeating relative gains in pollution controls from porous surfacing etc. You may want to recommend a more environmentally friendly substance or method of weed control. f. You may also want to consider the usage of sub-base storage as a more reliable alternative to blue roofs where possible. <p>Reason: To prevent increased risk of flooding to improve water quality and amenity to ensure future maintenance of the surface water drainage system</p>	
LBH Pollution	<p><u>Re: Planning Application HGY/2023/0728 at 341A Seven Sisters Road, Tottenham, London, N15 6RD</u></p> <p>Thanks for contacting the Carbon Management Team (Pollution) regarding the above planning application for the Construction of two new buildings to provide new</p>	Noted conditions on Land Contamination, Unexpected Contamination, Air Quality, NRRM and

	<p>warehouse living accommodation (Sui Generis (warehouse living)), ground floor café/ workspace (Use Class E) and associated waste collection and cycle parking. Erection of 10 stacked shipping containers (two storeys) to provide workspace/ artist studios (Use Class E), toilet facilities and associated waste collection and cycle parking. Landscape and public realm enhancements including the widening of and works to an existing alleyway that connects Seven Sisters and Tewkesbury Road, works to Tewkesbury Road, the creation of rain gardens, greening, seating, signage and artworks and all other associated infrastructure works, including the removal of an existing and the provision of a new substation to service the new development at 341A Seven Sisters Road, Tottenham, London, N15 6RD and I would like to comment as follows.</p> <p>Having considered all the relevant applicant submitted information including Design and Access Statement, Phase 1 Desktop Study with reference 24822-A2SI-XX-XX-RP-Y-0001-01 prepared by A2 Site Investigation Ltd, dated 21 October 2022 taking note of Sections 4 (Site History), 5 (Environmental Setting), 7 (Conceptual Site Model and Preliminary Risk Assessment), 8 (Closing Remarks), Energy Statement prepared by Expedition Engineering, dated 14th December 2022 taking note of section 4 (Methodology), 5 (Energy strategy) and 6 (Conclusion) as well as Air Quality Assessment prepared by Air Quality Solutions Ltd and taken note of Section 3 (Methodology), 4 (Baseline), 5 (Assessment) and 6 (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.</p> <p>1. <u>Land Contamination</u> Before development commences other than for investigative work:</p> <ol style="list-style-type: none"> a. Using the information already submitted in Geo-Environmental Site Investigation Report with reference B2538/22/GEO/1 prepared by Earth Environmental & Geotechnical (Southern) Ltd dated 22nd December 2022, an intrusive site investigation shall be conducted for the site using information obtained from the desktop study and Conceptual Model. The 	<p>Demolition/Construction Environmental Management Plans. All aspects form part of the recommended conditions. The associated s106 legal agreement requires the developer to sign up to the Considerate Contractors scheme.</p>
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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.

- b. The risk assessment and refined Conceptual Model shall be submitted, along with the site investigation report, to the Local Planning Authority which shall be submitted to, and approved in writing by, the Local Planning Authority prior to that remediation being carried out on site.
- c. Where remediation of contamination on the site is required, completion of the remediation detailed in the method statement shall be carried out and;
- d. A report that provides verification that the required works have been carried out, shall be submitted to, and approved in writing by the Local Planning Authority before the development is occupied.

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

2. Unexpected Contamination

If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until a remediation strategy detailing how this contamination will be dealt with has been submitted to and approved in writing by the Local Planning Authority. The remediation strategy shall be implemented as approved.

3. Updated Air Quality Assessment

Whilst the submitted Air Quality Assessment report prepared by Air Quality Solutions Ltd, dated 22nd February is noted, considering the distance of the proposed development to the monitoring sites used as baselines we do not consider this to be fully representative of the development site which is beside a major road (Seven Sisters Rd). and the likely operational effect of the road on the proposed development occupiers, 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. We also take note of the use of air source heat pumps and photovoltaic panels as energy source as well as the trackout medium dust risk.

Therefore, in order 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),

- Applicant will need to provide us an addendum AQ assessment of the proposed development taken into consideration the likely operational impact on the development by its proximity to a major busy road, so as to be able to reach an informed decision on its significant effects on the proposed development site and the overall local air quality.
- Actual baseline monitoring will need to be undertaken 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.
- Applicant will need to revise predicted NO₂ Concentrations following such assessment.

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.

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 NO_x 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

- a.** Demolition works shall not commence within the development until a Demolition Environmental Management Plan (DEMP) has been submitted to and approved in writing by the local planning authority whilst
- b.** Development shall not commence (other than demolition) until a Construction Environmental Management Plan (CEMP) has been submitted to and approved in writing by the local planning authority.

The following applies to both Parts a and b above:

- a) The DEMP/CEMP shall include a Construction Logistics Plan (CLP) and Air Quality and Dust Management Plan (AQDMP).
- b) The DEMP/CEMP shall provide details of how demolition/construction works are to be undertaken respectively and shall include:
 - i. A construction method statement which identifies the stages and details how works will be undertaken;

- ii. Details of working hours, which unless otherwise agreed with the Local Planning Authority shall be limited to 08.00 to 18.00 Monday to Friday and 08.00 to 13.00 on Saturdays;
 - iii. Details of plant and machinery to be used during demolition/construction works;
 - iv. Details of an Unexploded Ordnance Survey;
 - v. Details of the waste management strategy;
 - vi. Details of community engagement arrangements;
 - vii. Details of any acoustic hoarding;
 - viii. A temporary drainage strategy and performance specification to control surface water runoff and Pollution Prevention Plan (in accordance with Environment Agency guidance);
 - ix. Details of external lighting; and,
 - x. Details of any other standard environmental management and control measures to be implemented.
- c) The CLP will be in accordance with Transport for London's Construction Logistics Plan Guidance (July 2017) and shall provide details on:
- i. Monitoring and joint working arrangements, where appropriate;
 - ii. Site access and car parking arrangements;
 - iii. Delivery booking systems;
 - iv. Agreed routes to/from the Plot;
 - v. Timing of deliveries to and removals from the Plot (to avoid peak times, as agreed with Highways Authority, 07.00 to 9.00 and 16.00 to 18.00, where possible); and
 - vi. Travel plans for staff/personnel involved in demolition/construction works to detail the measures to encourage sustainable travel to the Plot during the demolition/construction phase; and
 - vii. Joint arrangements with neighbouring developers for staff parking, Lorry Parking and consolidation of facilities such as concrete batching.
- d) The AQDMP will be in accordance with the Greater London Authority SPG Dust and Emissions Control (2014) and shall include:
- i. Mitigation measures to manage and minimise demolition/construction dust emissions during works;
 - ii. Details confirming the Plot has been registered at <http://nrmm.london>;

	<p>iii. Evidence of Non-Road Mobile Machinery (NRMM) and plant registration shall be available on site in the event of Local Authority Inspection;</p> <p>iv. An inventory of NRMM currently on site (machinery should be regularly serviced, and service logs kept on site, which includes proof of emission limits for equipment for inspection);</p> <p>v. A Dust Risk Assessment for the works; and</p> <p>vi. Lorry Parking, in joint arrangement where appropriate.</p> <p>The development shall be carried out in accordance with the approved details. Additionally, the site or Contractor Company must be registered with the Considerate Constructors Scheme. Proof of registration must be sent to the Local Planning Authority prior to any works being carried out.</p> <p>Reason: To safeguard residential amenity, reduce congestion and mitigate obstruction to the flow of traffic, protect air quality and the amenity of the locality.”</p> <p>Informative:</p> <ol style="list-style-type: none"> 1. Prior to demolition of existing buildings, an asbestos survey should be carried out to identify the location and type of asbestos containing materials. Any asbestos containing materials must be removed and disposed of in accordance with the correct procedure prior to any demolition or construction works carried out. 	
<p>LBH Private Sector Housing Team</p>	<p>Houses in multiple occupation should include bedrooms sized at 10m² for a single room and 15m² for a double room. There should be no more than 5 people to one bathroom and 3 rooms to one kitchen.</p> <p>A platform bedspace/bed deck/mezzanine would increase the floorspace available in each unit.</p>	<p>The scheme would include room sizes below the HMO standard, but the floor-to-ceiling heights would allow for a bed deck which would free up</p>

	<p>In many HMOs the bedroom is the only space the tenant has as there may be no communal areas so the 10m2 single room/15m2 double room floor space allows for this.</p>	<p>space below. This would make the usable floorspace similar to the HMO standard. Moreover, the units would have access to communal spaces which is not always the case in HMOs. As such the quality of accommodation is considered to be acceptable in this context.</p>
<p>LBH Transportation</p>	<p><u>HGY/2023/0728 - 341A Seven Sisters Road, Tottenham, London, N15 6RD</u></p> <p><u>Site location and access</u> This site is located within the Haringey Warehouse district, on the corner of Eade Road and Seven Sisters Road.</p> <p>Eade Road is a Haringey Highway, apart from a short length at the junction with Seven Sisters Road, which is designed as TLRN/Red Route, where TfL are the Highway Authority.</p> <p>The site has a PTAL value of 5, considered 'very good' access to public transport services, there are 4 bus services within 2 to 3 minutes walk of the site, Manor House Underground station is a 12 minute walk, and Stamford Hill railway station an 11 minute walk.</p> <p>The site is located within formal CPZ's, the west side of Seven Sisters Road is within the Green Lanes 'B' CPZ, and the eastern side Seven Sisters south, both CPZ's</p>	<p>No objection subject to recommended conditions and s106/s278 obligations.</p> <p>The £250,000 contribution cannot be sought due to there being no surplus due to the viability position.</p>

operate Mon to Fri between 0800 – 1830 Eade Road has a mix of pay and display and CPZ bays along it with lengths of single yellow line predominantly to the northern side of the road.

Existing uses at the site

The application site includes a vacant plot on the corner of Eade Road and Seven Sisters Road, 2 to 4 Tewkesbury Road, an area behind Cara House (which is not included in the site) and the southern end of Tewkesbury Road, and the foot connection from Tewkesbury Road to Seven Sisters Road, both of which are currently owned by LB Haringey.

The site wraps around but does not include Cara House, which is currently occupied by a mixed-use warehouse living space with 70 residential rooms and associated workspace uses. A 10 space car park currently services Cara House.

Proposed development

It is intended to create a warehouse living development, with the construction of two new buildings, to house 101 bedrooms that will utilise a shared living arrangement, which will have a maximum occupancy of 133 persons, along with ground floor café and workspace, waste storage and cycle parking. In addition to the new buildings will be the erection of 10 stacked shipping containers (over two storeys) to provide workspace/ artist studios (Use Class E), toilet facilities and associated waste collection and cycle parking. 648 sqm of commercial /class E space is proposed.

11 of the bedrooms will be fully accessible.

The 10 space car park currently servicing Cara house will be removed from the site, and it is intended to create two new blue badge bays on Eade Road which could be used by occupiers of the 11 accessible units.

Landscape and public realm enhancements are also proposed, to include the widening of an existing footpath (Haringey footpath 164 – 165, which is a formal right of way)

that connects Seven Sisters and Tewkesbury Road, and works to Tewkesbury Road, at the southern end to form a 'gateway' to this new development proposal. Tewkesbury Road is Haringey Public Highway. On footway cycle parking is also proposed for the footway on Seven Sisters Road which is TfL controlled.

Transportation considerations

Access arrangements

It is intended to retain the existing highway access to the site off Eade Road for use by delivery and servicing vehicles.

Pedestrians will have two accesses into the site, one from Eade Road to the south of the site and the second located to the north-east of Cara House from Tewkesbury Road. The applicant proposes widening the existing formal right of way/footpath 164 – 165 to improve the quality and environment of this access.

Cycle access will be as per pedestrian access arrangements.

Widening and changes to footpath connecting Tewkesbury to Seven Sisters Road

The existing route is part provided with stairs, and these are 1.5m wide at the narrowest point. There is a 7.2m level difference between Tewkesbury and the footway along Seven Sisters Road. The applicant is proposing improvements to this route and the taking on of ownership and maintenance responsibilities. It is noted that the minimum width along the re-provided route will be 3m.

This should provide an improved facility compared to present, however there are legal considerations and processes to complete for this to change from highways ownership to private, including stopping up, diversion and reestablishment of the formal right of way, and other considerations such as ensuring the route will be fully available for public use in perpetuity along with proposed maintenance arrangements.

Initial advice from Haringey's Legal Team has highlighted that there are complexities regarding actual ownership of the footpath that the applicant will need to resolve before progressing this aspect of the development. Whilst listed in the rights of way register for the Borough, the Borough do not own the land on which the footpath passes over and the land appears to have no title. This situation does require the applicant to resolve.

In addition to resolving the land ownership details and status Haringey will also have to decide whether to formally 're establish' the formal right of way status once realigned, given the obvious public usage of this at present and historically.

Full access considerations

Disability/mobility impaired access has been referenced with this aspect of the development, it is commented that provision of an appropriately graded ramp for the mobility impaired would be impractical and not possible given the 7.2m level change (a 190m long ramp would be required). The submission also comments that a lift will not be provided, based on installation and maintenance costs grounds along with related concerns of vandalism and the like. The alternative route suggested for those unable to navigate the stepped replacement route is to progress along Seven Sisters Road footway, connecting to Tewkesbury via Netherton, this is detailed as a 220m walk with a gradient.

Whilst it is recognised that the footpath changes proposed would result in an improved facility, access considerations are such that we require a fuller understanding of the reasons a lift is not proposed for inclusion in the development and how this position has been arrived at. It is disappointing that an opportunity to address this cannot be provided but in order to fully understand the reasoning for the applicant's decision not to improve full access, more information is required so a conclusion can be reached on the reasonableness of that position.

Southern end of Tewkesbury Road

The applicant's proposal is to create a shared surface type arrangement to front the northern side of the site at this location. This would need to be agreed with the Highway Authority.

Formal processes for stopping up of the Highway at the end of Tewkesbury Road would need to be successfully completed to implement these aspects of the overall proposal. There are a number of parties that could claim access rights should this be formally stopped up as highway.

Trip generation

The TA includes results of a survey taken for existing occupiers of Cara House, which has a similar demographic and this recorded 158 total trips during a day, with two days surveyed. The highest mode shares recorded were for journeys by foot (71 – 81%), with the cycle mode share varying between 5% and 7% and the car driving mode between 6% and 12%. The survey results have been used to derive a trip rate for the new development, and overall, there are no issues with what will be the increased number of trips arising from it in terms of capacities and numbers of movements in the peaks.

These survey results have been applied, however with the car mode adjusted to reflect the zero parking aspect of the new 101 rooms. The trip rates and numbers do not create any concerns.

Car parking considerations

Given the site has a PTAL of 5, and is located within a CPZ, and within an area with CPZ coverage, it is appropriate in principle, and accords with Policy DM32 for designation/formalising as a car free development. Should the development be granted consent the applicant will need to enter into the appropriate Planning Agreement to formalise this, and meet all of the Council's administrative costs (£4000). This needs to apply for both residential and business permits.

There is an existing 10 space car park for Cara House within the site, and this will be removed from the site and redeveloped. The TA doesn't include any information on usage of this car park, the assumption is that the cars currently parking there will be displaced on street, it is not known if any current users of the car park are CPZ permit holders or not, or would apply for permits. The travel mode survey undertaken for Cara House recorded car driver mode shares varying between 6% and 12%, if this was taken to derive potential extra on street demands from the 70 existing residents, this would indicate an additional 4 to 8 vehicles parking on street (if they chose pay and display or had/obtained CPZ permits). Provision of the car club facility would very likely reduce this potential demand.

A Parking stress survey was carried out during September 2022, which recorded overnight occupation of 16 spaces out of 39 along Eade Road on the busiest night of the parking survey, thus leaving 23 spaces unused and a parking stress level of 41%. Based on these existing demands, it is considered acceptable to convert two existing CPZ spaces to blue badge spaces, which would effectively leave 21 residual spaces, and raise existing parking stresses to 46%.

Future parking demands

The TA includes a commentary on 'transport characteristics of Londoners' analysis developed by TfL, this suggests the most likely future residents of the site are those within the 'Students & Graduates', 'Affordable Transitions' and 'Urban Mobility' categories, all of which have low car ownership characteristics.

The TA suggests a likely car ownership level of 4%, based on being 10% of the 2011 census levels of car ownership recorded across the ward. This may or may not be accurate, but it is acknowledged that car ownership from the demographic at this development will be low, and the low parking stresses recorded on Eade Road mean that parking issues and high stresses are not expected from this proposal.

The overspill from the existing car park doesn't seem to have been included in the assessment of parking demands arising from the development. It is noted that the car

club proposal for the development includes provision of a facility for Cara House occupiers as well this is both welcomed and should reduce any potential demands raising from the loss of the car park.

The additional demands arising outside of CPZ operating hours from Cara House and this development, however overall, these are not expected to be problematical given the existing on street car parking capacity available, the nature and likely demographic of the development and very good access to public transport services.

Blue badge parking

The applicant is proposing provision of two blue badge bays on Eade Road to be provided by converting two standard existing parking spaces. The London Plan requirement is for the ability to provide 3% from the outset (3 spaces), and 10% (10 spaces) to meet demands if required. This therefore does fall short of the absolute London Plan requirement. On street blue badge bays can be dedicated to blue badge holders living adjacent, and blue badge holders can also park within CPZ and pay and display bays. As commented above the low levels of existing parking should mean space being available should demands arise for up to 10 spaces.

Cycle parking arrangements

24 uncovered spaces are currently provided for the 70 rooms of Cara House. The applicant references 'retaining and improving' this existing cycle parking but doesn't detail how. Given there will be a loss of car parking (10 spaces) for Cara House, it is considered that an increased amount of and improved cycle parking provision to meet London Plan standards is provided for these occupiers.

For the new build component of the development, the applicant during the pre-application phase proposed cycle parking provision of 0.75 spaces per bedroom to mirror current London Plan standards for student accommodation. Transportation commented that this was considered too low and inappropriate given the applicant intention to provide a development that is sustainable and intended to promote active

travel, so the applicant has now revised their proposals to provide a cycle parking space for each room (101 spaces).

The intended breakdown is as follows;

- 32 two-tiered stands = 64 spaces
- 5 Sheffield stands = 10 spaces
- 3 enlarged Sheffield stands = 6 spaces
- 21 long-stay spaces within the living space

It is noted that there are a number of double rooms included within the proposal (maximum occupancy of 133 persons within 101 rooms), so provision of one space per room within the development could potentially leave a shortfall of cycle parking given both occupiers of a room could very well have cycles requiring storage, given the location, car free status and likely demographic of the development. Therefore, an increase in long stay cycle parking to reflect and meet these anticipated demands should be provided.

The applicant comments that existing residents of Cara House prefer to keep and store their cycles within their living space, hence the proposal for 21 internal long stay spaces within the live/work units. The applicant has referenced improving cycle parking for Cara House residents but has not been specific as to how,

Transportation do not consider accommodation of long stay cycle parking spaces within living areas to count towards overall cycle parking provision. Cycle parking needs to be defined and 'fixed' so as to be formal and established physically for use. Informal storage within living accommodation may work for existing occupiers of Cara House but there is no certainty the areas used for cycle parking will remain solely in use for cycle parking over time if occupiers choose to utilise the space for storage or anything else. The applicant therefore needs to revise their cycle parking proposals to demonstrate how formal permanent cycle parking to meet the requirements of the London Cycle Design Standards is met.

6 residential short stay spaces, which meets London Plan numerical minimum requirements is proposed in the form of 3 Sheffield Stands.

For the commercial component of the development (648sqm) 4 long stay and 23 short stay cycle parking spaces are proposed. The long stay spaces are proposed for location within the commercial units.

It is noted 8 short stay spaces (4 Sheffield Stands) are proposed for location within the western side footway of Seven Sisters Road. These are on TfL Highway, and accordingly would need TfL's approval to locate there. Should this not be the case, the applicant needs to detail where this short stay cycle parking would be located (preferably within the development). The applicant should confirm the clear width of footway available at this location should cycles be parked in any new Sheffield Stands there.

With regards visitor cycle parking, it is noted minimum standards are met, given the nature of the development and occupier demographic it is considered appropriate for the applicant to detail where further visitor parking can be located and provided.

Overall, the applicant needs to revise their cycle parking proposals to ensure full compliance with London Plan, including formal parking for each room, and a provision overall exceeding one space per room given 133 residents could occupy the development.

Fully detailed and dimensioned drawings are required, that demonstrate how the proposed arrangements meet the requirements of the London Cycle Design Standards.

Highway arrangements and changes resultant from the proposal

The applicant is proposing the provision of two new blue badge bays on Eade Road, adjacent to the existing and future site access. The kerbside here currently has single

yellow lining in place, preventing parking from 0800 – 1830 from Monday to Saturday. Loading can take place for short durations from the single yellow line during these periods.

In addition to this the applicant is proposing refuse collection take place from kerbside, and one of the bin stores is located adjacent to a length of red route markings for the TfL administered section of Eade Road adjacent to the junction with Seven Sisters Road.

The parking/dwelling of larger service vehicles that will be unable to park within the site (anything larger than a 2,0m wide van or truck) are also proposed to be kerbside to the development.

The applicant has not provided a proposed layout drawing showing the revised arrangements on street with the new blue badge bays, revised single yellow lining and highway changes proposed, the applicant also needs to address TfL concerns with regards loading activity potentially impacting the free movement of the Eade Road/Seven Sisters junction on the TLRN.

The applicant should indicate where it expects loading activity to take place from taking into account the provision of two new blue badge bays to the immediate west of the site access outside of TLRN restrictions.

Delivery and servicing arrangements

The TA includes a survey of existing delivery and servicing movements to the existing Cara House site carried out over two days. This recorded 14 to 19 service vehicle arrivals on the two survey days. Some parking took place within the site and some on street.

Based on the above, the TA proposes that 68 delivery and servicing trips will take place on average per day, and it is proposed to accommodate two service bays within the site to accommodate most of these. These two bays can accommodate vehicles up

to 4.6T or 2.0m wide, and larger vehicles are intended to park on street. Taking into account average dwell durations and the numbers expected, the applicant considers that the two on site bays should accommodate most of the delivery and servicing trips to the site made by vehicles able to be accommodated, with the remainder parking on Eade Road.

Swept path plots within TA appear to show the safety buffer (what dimension is this?) overrunning building edges and internal footways. Vehicle edges shown on plot appear very close to building edges on access manoeuvre. The applicant should expand on the manoeuvres and confirm adequacy of the proposed arrangements, including details of the access way widths and how the movements of vehicles pedestrians and cyclists will be managed.

Waste and recycling storage and collection arrangements

It is intended for residential collections to take place from kerbside of Eade Road, it is not clarified where commercial waste collections will be made from.

ATZ assessment

The TA includes an ATZ assessment that examined 5 walk routes from the site to varying facilities. This did not raise any particular issues along the routes, beyond regular comments over providing seats for rest along routes and the lack of tactile crossings at two locations on Hackney Roads, Woodberry Road and Amhurst Road.

TfL have commented that they would seek for improvements to be made for connections to the east of the site towards Cycleway 1, it is assumed this means along Amhurst Road which is a Hackney Road. In principle this would be supported as Cycleway 1 does serve Haringey in the areas east and north of this site.

TfL have also commented as to improving the pedestrian crossings of Eade Road and Seven Sisters Road at the junction of the two roads, both of which are under TfL control, it is not clear what improvements are envisaged. Again, in principle any

changes that improve facilities for pedestrians, cyclists and have a highway safety value are supported.

Travel Plan

A draft residential travel plan is included within the TA. Overall, this appears sound as a basis for a future worked up Travel Plan process that will be required for the development. The format and proposed content is fine, and it is noted that there is a mode share target of 95% for sustainable/active travel modes. There will be a Travel Plan Monitoring Fee of £3000/year for the 5 year life of the travel plan and this will be covered by the S1906 for the development.

Car Club facility

The applicant has obtained written advice from Zipcar with respect to this development proposal, which is for the provision of a vehicle and car club space, and for funding of three year's membership for each room at the development and all the rooms within Cara House (the Zipcar proposal references all 180 rooms but of course there would be 171 if consented) and a £50 driving credit per room.

In addition to this the recommendation includes funding for one year's business account for any commercial enterprise in the commercial floor space that requests it. The recommendation doesn't detail where the new vehicle/bay will be located, it will need to be accessible to all whether within the development or on the public highway.

Construction Logistics Plan

A draft construction Logistics Plan is referenced within the application, the comments included provide very outline details of the content to be included and given the site's size, location and proximity to the TLRN, plus the location of Cara House within what will be an operational construction site, a fully detailed draft of a worked up Construction Logistics Plan will be required for review and approval prior to commencement of any site works. The applicant will need to liaise and discuss intended means of access and servicing the site from the Highway with both Haringey

and TfL Network Management Officers, and the outcomes of these conversations will need to inform the finished CLP.

Summary and conclusion

This development for a mixed use residential and workspace development at Eade Road is intended as a highly sustainable development in transportation terms, and is well connected and located for public transport services.

It is proposed as a car free development, and includes an intention to improve for footpath connection from Tewkesbury Road to Seven Sisters Road.

As commented on earlier in this response, there are land ownership and status aspects of the proposal that do require resolution by the applicant to successfully implement the development as proposed. The resolution of these lies with the applicant, relating to the proposals to re-provide and improved foot connection and stop up the south end of Tewkesbury.

In addition to this, there are some queries raised and further details required by Transportation officers, relating primarily to the cycle parking proposals, and the eventual arrangements on the public highway where new blue badge bays and increased loading and servicing activity is expected.

The applicant needs to revisit and increase cycle parking provision for the residential component of the scheme and provide full dimensional details to demonstrate adherence to London Cycles Design Standards and ensure a high quality cycle parking facility will be provided for the occupiers and visitors to this development.

In addition to this, the applicant needs to provide further information with respect to the envisaged/proposed highway arrangement on street within Eade Road and in the proximity of the Eade Road/Seven Sisters Road junction to demonstrate how it is intended for disabled parking and loading will take place adjacent to the site access and TLRN.

Further details are also required with respect to the highway access and internal movements of delivery and service vehicles as the swept path plots appear very tight for space, so further details of the dimensions and swept paths plus commentary on how the movement of vehicles, pedestrians and cyclists will be managed are required.

The application includes proposals for taking over the formal right of way connecting Tewkesbury and Seven Sisters Road to provide an improved footpath, and to stop up the southern end of Tewkesbury Road to provide an improved arrangement at that side of the development. Processes to formalise this via the Highways Act need to be followed to achieve this and will require approvals from the appropriate Highways and Transportation Officers.

The above points need to be addressed prior to decision.

There will also be some conditions and S106 appropriate listed as follows;

Conditions

Cycle parking details for approval

Proposed Highway arrangements layout drawings for approval

Construction logistics plan

S106

Car free/permit free status (£4000)

Car club facility

Travel plan and travel plan monitoring fee (£3000/annum for 5 years)

S278 Agreement for Eade Road, Tewkesbury Road

Highways act agreements to stop up, realign and reestablish the footpath connecting Tewkesbury and Seven Sisters Road

Improvements to Eade Road/Seven Sisters Road pedestrian crossings

Improved connections to Cycleway 1

Comments on Applicant response dated 06/09/2023:

Tewkesbury Road

If the applicant wishes for the southern end of be retained as Public Highway they will have to agree that with Highways Officers. If they haven't approached Highways yet this can be part of future S278 discussions however there is no guarantee Highways will want to retain this as Public Highway.

Cycle parking Cara house

As the applicant hasn't forwarded details of the proposed improvement, that can be covered by condition. It is disappointing that the opportunity is not being taken to increase cycle parking provision.

Long stay cycle parking for new development

As do TfL, we expect formal cycle parking to be provided for inclusion within the overall long stay provision. If the units are of greater size than London Plan minimum standards, with greater floor to ceiling heights than normal, and there is space beneath the private stairs or in other internal locations, formal parking should be provided. The applicant should demonstrate/detail locations for provision of formal cycle parking internally.

We also consider given the current transportation policy direction and the nature of the development that double rooms should have more than one cycle space.

With regards the cycle parking proposed for the footway to Seven Sisters Road, that is to be agreed with TfL, our query remains as to what width of footway would remain at the location of the proposed on highway cycle parking.

Changed Highway arrangements

It appears the applicant is now not proposing conversion of existing CPZ bays to blue badge bays. Whilst the recorded parking stresses are low, the applicant is expected to

locate two new blue badge bays as close as possible to the development, the closest bays appear to be part footway parking bays so it will need to be determined if these are suitable for use as blue badge bays. This detail can be resolved during the s278 process.

Delivery and servicing arrangements

The explanation provided by the applicant is helpful and there should not be any issues arising from the anticipated numbers of movements, the sizes of vehicles that will enter and dwell within the site, and the amount of delivery and servicing vehicles. The length of single yellow line adjacent to the site access to the north side of Eade Road should suffice for temporary dwelling of externally parked service vehicles and refuse/recycling collections.

Swept path plots

The applicant has confirmed the safety buffer on the swept path plots is 500mm. This is reassuring, however it does still appear quite tight for a Fire appliance. For the smaller expected 4.6T delivery vehicles there should be no issues.

Transportation Planning Comments

HGY/2023/0728 - 341A Seven Sisters Road, Tottenham, London, N15 6RD

Date: 22/01/2024

Proposal: Construction of two new buildings to provide new warehouse living accommodation (Sui Generis (warehouse living)), ground floor café/ workspace (Use Class E) and associated waste collection and cycle parking. Erection of 10 stacked shipping containers (two storeys) to provide workspace/ artist studios (Use Class E), toilet facilities and associated waste collection and cycle parking. Landscape and public realm enhancements including the widening of and works to an existing alleyway that connects Seven Sisters and Tewkesbury Road, works to Tewkesbury Road, the creation of rain gardens, greening, seating, signage and artworks and all other associated infrastructure works, including the removal of an existing and the provision of a new substation to service the new development.

Description

The application is for a new warehouse living development, with the construction of two new buildings, to house 101 bedrooms that will utilise a shared living arrangement, 11 of the bedrooms will be fully accessible. The development proposal will have a maximum occupancy of 133 persons, along with ground floor café and workspace, waste storage and cycle parking. In addition to the new buildings will be the erection of 10 stacked shipping containers (over two storeys) to provide workspace/ artist studios (Use Class E), toilet facilities and associated waste collection and cycle parking. 648 sqm of commercial /class E space is proposed. The 10-space car park currently at the front of Cara house will be removed from the site, and the proposal includes the provision of two new blue badge bays on Eade Road which could be used by occupiers of the 11 accessible units. Landscape and public realm enhancements are also proposed, to include the widening of an existing footpath (Haringey footpath 164 – 165, which is a formal right of way) that connects Seven Sisters and Tewkesbury Road, and works to Tewkesbury Road, at the southern end to form a 'gateway' to this new development proposal. Tewkesbury Road is Haringey Public Highway. On footway cycle parking is also proposed for the footway on Seven Sisters Road which is TfL controlled.

The application site includes a vacant plot on the corner of Eade Road and Seven Sisters Road, 2 to 4 Tewkesbury Road, an area behind Cara House (which is not included in the site) and the southern end of Tewkesbury Road, and the foot connection from Tewkesbury Road to Seven Sisters Road, both of which are currently owned by LB Haringey. The site wraps around but does not include Cara House, which is currently occupied by a mixed-use warehouse living space with 70 residential rooms and associated workspace uses.

This site is located within the Haringey Warehouse district, on the corner of Eade Road and Seven Sisters Road. Eade Road forms part of Haringey's Highway network, apart from a short length at the junction with Seven Sisters Road, which is designed as TLRN/Red Route, making Transport for London the Highway Authority. The site has a

PTAL value of 5, considered 'very good' access to public transport services, there are 4 bus services within 2 to 3 minutes' walk of the site, Manor House Underground station is a 12-minute walk, and Stamford Hill railway station an 11-minute walk. The site is located within Green Lanes B CPZ, which restricts parking to permit holders only Monday to Friday 0800 – 1830. Eade Road has a mix of pay and display and CPZ bays along it with lengths of single yellow line predominantly to the northern side of the road.

Trip generation

The Transport Assessment has included the results of travel surveys over a two-day period taken of the existing occupiers of Cara House, which are of a similar demographic to the proposal. The survey showed the highest mode of travel to be to be walking/pedestrians, with representing between 61% and 81% for both entry and exits, the second highest mode of travel was for cycling. Consequently, this presents sustainable transport as the dominant method of travel. The survey results have been used to derive a trip rate for the new development, as both the new 101-bedroom dwellings will be built with the existing 70 bedrooms being retained. This gives rise to trip generation which has been calculated for 171 bedrooms. The following two-way trips numbers were calculated: Underground 157, Buses 121, Train 36, Pedestrian 30, Cycle 28, and Car 4, this is out of a total 375 two-way trips.

There are no issues with the increased number of trips arising from the development proposal in the peak hours. This is because these trip numbers can easily be absorbed by local public transport given the sites high PTAL and accessibility to transport links. Overall, LBH Transport Planning finds the trip generation to be satisfactory.

Car Parking

There is an existing 10 space car park for Cara House within the site, and this will be removed from the site and redeveloped. The TA doesn't include any information on usage of this car park, the assumption is that the cars currently parking there will be displaced on street, it is not known if any current users of the car park are CPZ permit holders or not or would apply for permits. The travel mode survey undertaken for Cara

House recorded car driver mode shares varying between 6% and 12%, if this was taken to derive potential extra on street demands from the 70 existing residents, this would indicate an additional 4 to 8 vehicles parking on street (if they choose to pay and display or had/obtained CPZ permits). Provision of the car club facility would very likely reduce this potential demand.

A Parking stress survey was carried out during September 2022, which recorded overnight occupation of 16 spaces out of 39 along Eade Road on the busiest night of the parking survey, thus leaving 23 spaces unused and a parking stress level of 41%. The applicant has proposed the provision of two blue badge bays on Eade Road adjacent to the site to provide by converting two standard existing parking spaces. No on-site blue badge bays have been proposed by the developer/applicant. They have conducted a parking stress survey to review parking on Eade Road at night over a two period. It showed on-street occupancy to be between 28% - 41%, and with the conversion of two of the permit bays to blue badge holders this would bring park stress to 30% - 43% respectively. This is well below the 85%, which indicates when a street has parking stress.

As no direct policy applies to warehouse living within the London Plan 2021, Policy T6.1 Residential Parking has been utilised instead. It states that 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. For development this would equate to 10 disabled bays having to be provided by the developer. However, as this development does not fit within residential nor student accommodation LBH Transport Planning would require the developer/applicant to provide 3 on-street disabled bays to offset any future demand from this proposal. These bays can be dedicated to blue badge holders living within the development, and blue badge holders can also park within CPZ and pay and display

bays. As commented above the low levels of existing parking should mean space being available should demands arise for up to 3 spaces or more. This will have to be managed by a parking management plan, linked to the Travel Plan which will identify future demands and trigger any necessary application to the Council.

The applicant will be required to provide three on street blue badge bays. This can be dealt with via way of a parking management plan secured by the S.106 agreement and a S278 process and further comments relating to this are included later in this response.

Future parking demands

The TA includes a commentary on ‘transport characteristics of Londoners’ analysis developed by TfL, this suggests the most likely future residents of the site are those within the ‘Students & Graduates’, ‘Affordable Transitions’ and ‘Urban Mobility’ categories, all of which have low car ownership characteristics.

The TA suggests a likely car ownership level of 4%, based on being 10% of the 2011 census levels of car ownership recorded across the ward. This may or may not be accurate, but it is acknowledged that car ownership from the demographic at this development will be low, and the low parking stresses recorded on Eade Road mean that parking issues and high stresses are not expected from this proposal.

The overspill from the existing car park doesn’t seem to have been included in the assessment of parking demands arising from the development. It is noted that the car club proposal for the development includes provision of a facility for Cara House occupiers as well this is both welcomed and should reduce any potential demands raising from the loss of the car park.

The additional demands arising outside of CPZ operating hours from Cara House and this development, however overall, these are not expected to be problematical given the existing on street car parking capacity available, the nature and likely demographic of the development and very good access to public transport services.

Given the site has a PTAL of 5, and is located within a CPZ, and within an area with CPZ coverage, it is appropriate in principle, and accords with Policy DM32 for designation/formalising as a car free development. Should the development be granted consent the applicant will need to enter into the appropriate Planning Agreement to formalise this and meet all of the Council's administrative costs (£4000). This needs to apply for both residential and business permits.

Cycle parking

The development site currently has 24 cycle spaces on-site which is located within the forecourt. The original cycle parking provision for this site were based upon the student accommodation standards within the published London Plan 2021 Policy T5 Cycle which are 0.75 spaces per bedroom for long-stay and 1 space per 40 bedrooms for short-stay. However, it was felt from previous discussions with the developer/applicant from LBH Transport Planning that the provision should be based upon the ratio of 1 cycle space per bedroom. Therefore, the developer has proposed to provide 101 long-stay residential cycle spaces on-site, which are based upon 101 bedrooms. These are broken down as follows:

- 32 two-tiered stands = 64 spaces
- 5 Sheffield stands = 10
- 3 enlarged Sheffield stands = 6 spaces
- 21 long-stay spaces within the living space

These long-stay residential cycle spaces will be stored within underneath staircases, against walls and below bed decks, as it is preferred by residents given its warehouse living status. 6 short-stay cycle spaces would be provided based upon both student and C3 Dwellings. Commercial cycle parking provision will be 4 long-stay and 23 short-stay. It is stated within the Transport Assessment that all short-stay cycle spaces are to be provided on the public on the public realm. Although, all cycle parking should be provided and located within the curtilage of the site. Overall, LBH Transport Planning finds the cycle parking to be satisfactory and in accordance with the published London Plan 2021 Policy T5 Cycle.

A condition should be attached to the planning permission requiring the applicant to submit details of cycle parking spaces in line with the London Plan and the London Cycle Design Standards (LCDS) which must be submitted and approved before development commences on site.

Car Club

The applicant/ developer has sought advice from Zipcar with respect to this development proposal. Zipcar have recommended that they would provide a single car at the development, and fully managed by themselves. Furthermore, funding for three years of membership would be provided for each room. A total of £16,700 would be needed in way of a contribution prior to the date of first occupation. This analysis by Zipcar have referenced 180 bedrooms in error, whereas this proposal is for 101 bedrooms, with the 70 existing being retained. Furthermore, the recommendation doesn't detail where the new vehicle/bay will be located, it will need to be accessible to all whether within the development or on the public highway. LBH Transport Planning will require the developer/applicant to enter into a S106 agreement with Haringey Council for them to provide car club facilities in the local vicinity of the location site for the potential occupants of the development. This would assist with reducing the rate of car ownership from residents of this development and help to offset any potential parking impacts on local residential streets when the CPZ is not in operation. The applicant will be required to provide 3 years car club membership for each residential unit, along with £100 driving credit, which has been already stated within the submitted Transport assessment by Zipcar.

Access

The Transport Assessment includes an Active Travel Zone (ATZ) assessment for the site. five routes have been included within the assessment which included the following destinations/routes:

- Finsbury Park
- Haringay Green Lanes Station and Supermarkets
- Woodbury Wetlands/Reservoir

- Stamford Hill Station and Spring Hill Practice
- Eade Road

Recommendations for improvements to these routes have been suggested, which include widening of the footway, improved street lighting, provision of benches, installation of low-level street planting and trees, tactile paving, and the installation of bins. Collision data has been sourced which covers a 3-year period from 2018 – 2020 and a 500m radius from the site location. During this period 14 serious collisions were recorded and no fatal collisions. The data submitted only included vulnerable road users who were pedestrians and cyclists. Two of the 14 were on Eade Road the remainder of the collision occurred on Seven Sisters Road. The developer has not presented any recommendations for improvements to road safety for both pedestrians and cyclists, as they have explained as they believe the low numbers of collisions near the site shows there are no issues with highway safety. LBH Transport Planning would require the developer to provide some funding towards the scoping and establishment of improvements to the highway for pedestrians and cyclists as their numbers will increase with the introduction of this development. This is supported by the trip generation, which show sustainable transport as having the highest trip numbers. The contribution is required in relation to the provision of new cycle infrastructure on St Anns Road to link in with CS1 and the introduction of the new C50 proposal linking Finsbury Park to Tottenham Hale.

We will therefore be seeking a contribution of £250,000 towards the feasibility design and consultation for proposal on both routes.

Highway works

Pedestrian access will be from both Eade Road and Tewkesbury Road. The developer/applicant has proposed the widening of the existing formal right of way/footpath 164 – 165 to improve the quality and environment of this access. The Council's site allocations DPD includes sites SA34 and SA35 at this location. The policy document does include within its requirements for these sites to have improved pedestrian permeability, and to provide improved connections from the Warehouse

District to Seven Sisters and Amhurst Roads. The existing route is part provided with stairs and is 1.5m wide at the narrowest point. There is a 7.2m level difference between Tewkesbury and the footway along Seven Sisters Road. The applicant is proposing improvements to this route to provide a minimum width of 3m along the footpath. LBH Transport Planning would require the applicant to enter into the necessary highways legal agreements to divert the path and to make the necessary improvements, the scheme will have to be the subject of further detailed design development and will have to be secured by a S.23 and S.278 under the highways act. Ultimately, this aspect of the application as proposed/presented is considered a fundamental part of it from the transportation and highways perspective, and successful implementation of the proposed arrangements will be necessary for a successful application.

Disability/mobility impaired access has been referenced with this aspect of the development; it is commented that provision of an appropriately graded ramp for the mobility impaired would not be physically possible given the 7.2m level change (a 190m long ramp would be required). The submission also comments that a lift will not be provided, based on installation and maintenance costs grounds along with related concerns of vandalism and the like. The alternative route suggested for those unable to navigate the stepped replacement route is to progress along Seven Sisters Road footway, connecting to Tewkesbury via Netherton, this is detailed as a 220m walk with a gradient. It is unfortunate that this connection cannot be made completely accessible, however the gradient and alignment make this impossible. The replacement route is only slightly longer than a switchback ramp route would be.

The applicant's proposal is to create a shared surface type arrangement to front the northern side of the site at this location. This would have to be the subject of further detailed design and approval and will have to be secured as part of a S.278 agreement.

Delivery and Servicing

A Draft Service and delivery plan has not been submitted as part of this application. The Transport Assessment includes information on existing trips to Cara House, with a survey being conducted which examined the existing delivery and servicing movements which was conducted over two days. This recorded 14 to 19 service vehicle arrivals on the two survey days. Although, some parking did take place within the site and on-street. Based on the above, the Transport Assessment proposes that 68 delivery and servicing trips will take place on average per day, and it is proposed to accommodate two service bays within the site to accommodate most of these. These two bays can accommodate vehicles up to 4.6T or 2.0m wide, and larger vehicles are intended to park on street. Considering average dwell durations and the numbers expected, the applicant considers that the two on site bays should accommodate most of the delivery and servicing trips to the site made by vehicles able to be accommodated, with the remainder parking on Eade Road. It should be noted that these servicing arrangements are meant for both the existing site, proposal site, which will equate to 171 bedrooms and the commercial element which could be a café, workspace, and art studio. As mentioned already the developer has proposed that delivery/refuse vehicles can park on-street on the yellow lines as when there is not enough room on-site or when they larger vehicles. However, the single yellow lines are not suitable as they have waiting time restrictions which utilise the same times as the CPZ. Furthermore, part of the site fronts onto the red route which does not allow for any waiting at any time. The developer will be required to submit a service and delivery plan which includes details refuse collection and service trips to the site, this must be submitted and approved before the site is occupied. This must include a new loading bay on-street. This can be addressed via way of a S278 agreement. LBH Transport Planning will also condition the submission of Delivery and Servicing Plan and Waste Management.

Travel Plan

A draft residential Travel Plan is included within the TA. Overall, this appears sound as a basis for a future worked up Travel Plan process that will be required for the development. The format and proposed content have been found to be acceptable, and it is noted that there is a mode share target of 95% for sustainable/active travel

modes. There will be a Travel Plan Monitoring Fee of £3000 per year for the first 5 years of the development and this will be covered by way of a S.106 obligation for the development.

Construction Logistics Plan

A draft construction Logistics Plan has been submitted can be found within the Transport Assessment. It provides an outline of the content to be included and given the site's size, location and proximity to the TLRN, plus the location of Cara House within what will be an operational construction site, a fully detailed draft of a worked-up Construction Logistics Plan will be required for review and approval prior to commencement of any site works. The applicant will need to liaise and discuss intended means of access and servicing the site from the Highway with both Haringey and TfL Network Management Officers, and the outcomes of these conversations will need to inform the finished CLP.

A high level of cycle parking should be made available for workers during all phases of construction, this will help to promote the uptake of cycling to the site. As the site is relatively well connected by public transport in the surrounding area no on-site car parking should be provided for workers which has already been referenced by the outline. This is further supported by local CPZs and town centre car parks. The following times, 08:00-09:00, 15:00-16:00, and 17:00-18:00, are recommended to be avoided by delivery and construction vehicles as to prevent vehicles from related to the development travelling when the road network is at its busiest e.g. school drop-off/pick-up times. Effort should be made to have a process in place to deal with delivery vehicles that turn up late or announced so that vehicles are not waiting on the public highway causing an obstruction.

LBH Transport Planning would require that a Construction Logistics Plan (CLP) be submitted by the developer/applicant, this can be secured via a S.106 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 fifteen thousand pounds (£15,000) for the monitoring of the construction activities on site.

Summary and conclusion

This development for a mixed use residential and workspace development at Eade Road is intended as a highly sustainable development in transportation terms and is well connected and located for public transport services. It is proposed as a car free development, which includes an intention to improve the footpath connection from Tewkesbury Road to Seven Sisters Road. The Borough's site allocations DPD requires improved pedestrian permeability, and the provision of improved connections from the Warehouse District to Seven Sisters and Amhurst Roads.

As commented on earlier in this response, there are land ownership and status aspects of the proposal that do require resolution by the applicant to successfully implement the development as proposed. The resolution of these lies with the applicant, relating to the proposals to re-provide and improved footpath connection and stop up the south end of Tewkesbury. Transportation consider delivery of the improved footpath is a fundamental part of this proposal, so a Grampian Condition should therefore be imposed to ensure that the necessary formalities are successfully completed so the improved footpath connection can be delivered as a precursor to overall delivery of the development.

Recommendation

LBH Transport Planning have no objections to this proposal subject to the following 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 delivery 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. It should demonstrate how the development will include the consolidation of deliveries and enable last mile delivery using cargo bikes.

Details should be provided on how deliveries can take place without impacting on the public highway, the document should be produced in line with [TfL guidance](#). The final DSP must be submitted at least 6 months before the site is occupied and must be reviewed annually in line with the travel plan for a period of 3 years unless otherwise agreed by the highway's authority.

Reason: To ensure that the development does not prejudice the free flow of traffic or public safety along the neighbouring highway and to comply with the TfL DSP guidance 2020

2. Cycle Parking

The applicant will be required to submit plans showing accessible; sheltered, and secure cycle parking for 101 long-stay, 6 short -stay residential, 4 long-stay, and 23 short-stay commercial spaces for approval. The quantity must be in line with the London Plan 2021 T5 Cycle and the design must be in line with the London Cycle Design Standard. No Development (including demolition) shall take place on site until the details have been submitted and approved in writing by the Council.

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).

S.106 Obligations

1. Car-Free Agreement

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

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

2. 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 £15,000 (fifteen thousand pounds) to cover officer time required to administer and oversee the 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 before and after completion.
- f) The implementation and use of the Construction Logistics and Community Safety (CLOCS) standard.
- g) The applicant will be required to contact LBH Highways to agree condition on surveys.
- h) Site logistics layout plan, including parking suspensions, turning movements, and closure of footways.
- i) Swept path drawings.

Reason: to ensure that the impacts of the development proposal on the local highways network are minimised during construction, and to coordinate construction activities in key regeneration areas which will have increased construction activities.

3. Car Club Membership

The applicant will be required to enter into a Section 106 Agreement to establish a car club scheme, including the provision of adequate car club bays and associated costs,

and must include the provision of five years' free membership for all residents and £100 (one hundred pounds in credit) per year/per unit for the first 5 years.
Reason: To enable residential occupiers to consider sustainable transport options, as part of the measures to limit any net increase in travel movements.

4. Residential Travel Plan

Within six (6) months of first occupation of the proposed new residential development a Travel Plan for the approved residential uses must be submitted to and approved by the Local Planning Authority detailing means of conveying information for new occupiers and techniques for advising residents of sustainable travel options. The Travel Plan shall then be implemented in accordance with a timetable of implementation, monitoring and review to be agreed in writing by the Local Planning Authority, we will require the following measures to be included as part of the travel plan in order to maximise the use of sustainable modes of active 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, £3,000 (three thousand pounds) per year for a period of five years £15,000 (fifteen thousand pounds) in total for the monitoring of the travel plan initiatives.
- d) Parking management plan which monitors the provision of disabled car parking spaces for the site and triggers any necessary provision on the local highways network.

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

5. Commercial Travel Plan

A commercial travel plan must be secured by the S.106 agreement and submitted 6 months before occupation. 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 Commercial Travel Plan for the commercial aspect of the Development 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:
- b) Provision of commercial induction packs containing public transport and cycling/walking information, available bus/rail/tube services, showers. Lockers, map and timetables to all new staff, travel pack to be approved by the Councils transportation planning team.
- c) The applicant will be required to provide, showers lockers and changing room facility for the commercial element of the development.
- d) 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.
- e) The first surveys should be completed 6 months post occupation or on 50% occupation whichever is sooner.

Reason: To promote travel by sustainable modes of transport in line with the London Plan 2021 and the Council's Local Plan SP7 and the Development Management DMPD Policy DM 32.

6. Highway Improvements

The owner shall be required to enter into agreement with the Highway Authority under Section 38, 177, 278 of the Highways Act, and S.247 of the Town and County Planning, 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, improved pedestrian and cycling infrastructure. The developer will be required to provide details of any temporary highways including temporary TMO's required to enable the

	<p>occupation of each phase of the development, which will have to be costed and implemented independently of the main S.278 works. The works include but are not limited to the removal of the crossover to the site to reinstate the footway and / or the creation of any on-street disabled car parking bays which will require electrification. The applicant will be required to provide a detailed design for including CCTV, lighting improvements, details will also be required in relation to the proposed works including but not limited to: widening, including adoption and long-term maintenance, the drawing should include, existing conditions surveys construction details, signing and lining, the scheme should be design in line with the 'Healthy Streets' indicators perspective, full list of requirements to be agreed with the highways Authority. In addition, the applicant will be required to submit detailed drawings of the highways works for all elements of the scheme including the reprovision of the footpath, these drawings should be submitted for approval before any development commences on site.</p> <p>Reason: To implement the proposed highways works to facilitate future access to the development site and to protect the integrity of the highways network.</p> <p><u>7. Highways improvement contribution.</u></p> <p>Give the increase numbers of cycling trips that will be generated by the site the developer will be required to make a contribution of £250,000 (two hundred and fifty pounds) towards the provision of cycling infostructure in the area surrounding the site, the contribution is for the provision of new cycle infrastructure on St Anns Road to link in with CS1 and the introduction of the new C50 proposal linking Finsbury Park to Tottenham Hale.</p> <p>Reasons: Improve cycle infostructure in area surrounding the site and promote sustainable development in line with the Councils Adopted Local Plan Policy SP1 and SP7.</p>	
LBH Trees - Arboricultural Officer	From an arboricultural point of view, I hold no objections.	Noted.

	<p>No arboricultural report has been submitted due to very few trees on site. There is a line of topped Leylandii trees that have been managed as a hedge (as seen from Google Street view and aerial). These trees are low grade and value. Comprehensive greening and landscape plans have been forwarded. These show trees and their species to be planted. The selection has good urban fitness, and interest.</p>	
<p>LBH Waste and Street Cleansing</p>	<p>22/08/2023 later comments - The calculation they have applied to the bins numbers and waste streams seems proportionate, given there are only bedroom rather than property numbers, so I agree with the quantities allocated based on the applied rationale.</p> <p>Other points I was going to raise such as servicing on a red route have already been discussed and agreed with colleagues in the waste team so I don't have any other comments except relating to my previous feedback about the food waste container size which should be 140 rather than 240 litres. Those containers numbers will need to be adjusted and would equate to 14 x 140 litre bins in total based on the guidance below. I have some reservations about that as in the 2013 guidance it would have required 7 food waste bins so if it's a pinch point, we could discuss what would be appropriate for this scheme.</p> <p>---</p> <p>22/08/2023 - The proposal for refuse and recycling vehicles to service bins from Eade Road seems reasonable although depending on the number of containers to be serviced they may be there for a while and cause an obstruction as the road is not very wide. There is mention of two bays which will be managed by booking slots with the site management for loading and deliveries to avoid multiple vehicles arriving on-site. (para 5.2.3) but this will not be practical for the RCV's, if it is intended for them too.</p> <p>I noticed there was reference to the use of 240 litre bins for food waste (para. 5.3.4) but we have can only service 140 litre bins for food waste so the bin allocation should</p>	<p>Noted. Waste condition recommended.</p>

be on that basis and it is noted that commercial waste and recycling storage will be separate from the domestic waste streams, which is welcomed.

I couldn't find any details on the numbers of waste and recycling containers proposed for the development but will be willing to comment on these if and when they are available. The latest guidance on waste and recycling storage (if it hasn't already been published) is available in the two tables below.

Refuse allocation	Capacity	Approximate bin dimensions
Per 1 bed, low-rise dwelling when supplied for sole use.	140 litres	550mm D x 500mm W x 1060mm H
Per low-rise dwelling with more than 1 bed, when supplied for sole use.	240 litres	740mm D x 590mm W x 1080mm H
Dry mixed recycling allocation		
Per single 1 bed dwelling when supplied for sole use.	140 litres	550mm D x 500mm W x 1060mm H
Per single 2/3 bed dwelling when supplied for sole use	240 litres	740mm D x 590mm W x 1080mm H
Food waste allocation		
Per dwelling	25 litres	350mm D x 300mm W x 360mm H
Garden waste collection is an opt-in subscription service with a weekly collection via 140L or 240L wheeled bins or by biobags. Lids must be closed, and no side waste/excess waste will be collected. Any property that has potential to produce garden waste must have adequate and suitable space to store and collect a 240 litre bin alongside all other bins, off of the highway.		

	<p>Haringey's standard waste and recycling capacity for communal collections is assessed by the following formula:</p> <table border="1" data-bbox="504 272 1608 858"> <thead> <tr> <th data-bbox="504 272 990 389">Refuse allocation</th> <th data-bbox="999 272 1160 389">Capacity</th> <th data-bbox="1169 272 1608 389">Approximate bin dimensions</th> </tr> </thead> <tbody> <tr> <td data-bbox="504 395 990 469">per 6 dwellings</td> <td data-bbox="999 395 1160 469">1100 litres</td> <td data-bbox="1169 395 1608 469">985mm D x 1260mm W x 1370mm H</td> </tr> <tr> <td data-bbox="504 475 990 564">Dry mixed recycling allocation</td> <td data-bbox="999 475 1160 564"></td> <td data-bbox="1169 475 1608 564"></td> </tr> <tr> <td data-bbox="504 571 990 644">per 10 dwellings</td> <td data-bbox="999 571 1160 644">1100 litres</td> <td data-bbox="1169 571 1608 644">985mm D x 1260mm W x 1370mm H</td> </tr> <tr> <td data-bbox="504 651 990 686">Food waste allocation</td> <td data-bbox="999 651 1160 686"></td> <td data-bbox="1169 651 1608 686"></td> </tr> <tr> <td data-bbox="504 692 990 737">per dwelling</td> <td data-bbox="999 692 1160 737">20 litres</td> <td data-bbox="1169 692 1608 737">140 litre wheeled bins</td> </tr> <tr> <td colspan="3" data-bbox="504 743 1608 858">Any proposal to incorporate rubbish chutes must include an 'Innovation and residential waste management plan'</td> </tr> </tbody> </table>	Refuse allocation	Capacity	Approximate bin dimensions	per 6 dwellings	1100 litres	985mm D x 1260mm W x 1370mm H	Dry mixed recycling allocation			per 10 dwellings	1100 litres	985mm D x 1260mm W x 1370mm H	Food waste allocation			per dwelling	20 litres	140 litre wheeled bins	Any proposal to incorporate rubbish chutes must include an 'Innovation and residential waste management plan'			
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Environment Agency	<p>Thank you for consulting us on the above application on 14 April 2023. As part of the consultation, we have reviewed the documents in line with our remit including the documents entitled:</p> <ul style="list-style-type: none"> • 'Seven Sisters / Eade Road: Planning Application for new warehouse living buildings 1547-LSL-XX-XX-RP-C-SWS Surface Water Drainage Strategy' prepared by London Structures Lab, dated January 2023 (Revision R(03)). • 'Harringay Warehouse District, Phase 1 Desk Study', prepared by A2 Site Investigation, dated 21 October 2022 (ref: 24822-A2SI-XX-XX-RP-Y-0001-01). <p>Environment Agency Position</p>	Noted.																					

Based on a review of the submitted information, we have no objection to the proposed development.

The Environment Agency agrees with conclusions made in the A2 Site Investigation Phase 1 that risks to groundwater are low due to the significant thickness of London Clay which will protect the deeper aquifer from which potable resources are drawn.

It is also noted that no piled foundations penetrating the London Clay are proposed and that infiltration drainage is not considered an option.

Based on this we have no further comments at this time. Should there be any change to these aspects of the development the Environment Agency requests to be reconsidered.

Advice to applicant

Water Resources

Increased water efficiency for all new developments potentially enables more growth with the same water resources. Developers can highlight positive corporate social responsibility messages and the use of technology to help sell their homes. For the homeowner lower water usage also reduces water and energy bills.

We endorse the use of water efficiency measures especially in new developments. Use of technology that ensures efficient use of natural resources could support the environmental benefits of future proposals and could help attract investment to the area. Therefore, water efficient technology, fixtures and fittings should be considered as part of new developments.

Residential developments

All new residential developments are required to achieve a water consumption limit of a maximum of 125 litres per person per day as set out within the Building Regulations &c. (Amendment) Regulations 2015.

	<p>However, we recommend that in areas of serious water stress (as identified in our report Water stressed areas - final classification) a higher standard of a maximum of 110 litres per person per day is applied. This standard or higher may already be a requirement of the local planning authority.</p> <p><u>Commercial/Industrial developments</u> We recommend that all new non-residential development of 1000sqm gross floor area or more should meet the BREEAM 'excellent' standards for water consumption.</p> <p>We also recommend you contact your local planning authority for more information.</p> <p>Final comments Thank you for contacting us regarding the above application. Our comments are based on our available records and the information submitted to us. Please quote our reference number in any future correspondence. Please provide us with a copy of the decision notice for our records. This would be greatly appreciated.</p>	
<p>Greater London Authority (GLA) / Mayor for London</p>	<p>Appendix 9: GLA Stage 1 response for full report.</p>	<p>Noted conditions are recommended.</p>
<p>Greater London Archaeology Advisory Service (GLAAS)</p>	<p>Having considered the proposals with reference to information held in the Greater London Historic Environment Record and/or made available in connection with this application, I conclude that the proposal is unlikely to have a significant effect on heritage assets of archaeological interest.</p> <p>In view of the scale of the impacts and the likely impacts of past quarrying and landfill, I do not advise archaeological investigation in relation to this scheme.</p> <p>No further assessment or conditions are therefore necessary.</p>	<p>Noted.</p>

	<p>This response relates solely to archaeological considerations. If necessary, Historic England's Development Advice Team should be consulted separately regarding statutory matters.</p>	
<p>Health & Safety Executive – Planning Gateway One (Building Safety Regulator)</p>	<p>Headline response from HSE = 'content'</p> <p>Scope of consultation</p> <p>1.1. The above consultation relates to an application for two blocks, A and B, and ten stacked shipping containers forming two storeys of commercial use. Blocks A and B have storey heights of 25.83m and 11.35m respectively.</p> <p>Previous consultation</p> <p>1.2. HSE issued a substantive response 'Concern' dated 12/05/2022, under the reference pgo-3123 in relation to a consultation received on 14/04/2022.</p> <p>1.3. HSE received a second consultation request on 26/07/2022, and responded on 16/08/2022, under the HSE reference pgo-3667, with the headline 'Concern'</p> <p>Consultation meeting</p> <p>1.4. A meeting was held on 05/10/2023, attended by the Planning Officer, the applicant's design team and HSE to discuss the scheme following the formal planning submission.</p> <p>Current consultation</p> <p>1.5. The current consultation was received on 13/11/2023 providing a document 'Fire Strategy-RIBA Stage 3' ('the applicant's response'). For the avoidance of doubt, this substantive response is in relation to the applicant's response.</p> <p>1.6. Following a review of the information provided in the planning application, HSE is content with the fire safety design as set out in the project description, to the extent it affects land use planning considerations.</p>	<p>Noted.</p>

<p>London Underground/DLR Infrastructure Protection</p>	<p>Though we have no objection in principle to the above planning application there are a number of potential constraints on the redevelopment of a site situated close to London Underground railway infrastructure.</p> <p>Therefore, we request that the grant of planning permission be subject to the following requested separate numbered conditions to be discharged in a phased manner as and when they are completed.</p> <p>1. Before the pre-commencement/Site formation/Demolition stage begins, no works shall be carried out until the following, in consultation with TfL Infrastructure Protection, have been submitted to and approved in writing by the local planning authority.</p> <ul style="list-style-type: none"> a) Provide an overview of the overall development including both design on temporary and permanent works. b) Provide detailed design and Risk Assessment and Method Statement (RAMS) for the demolition works. c) Identify and accommodate the location of the existing London Underground structures. d) Demonstrate that any EMC emissions from any plant or equipment to be used on the site or in the finished structure will not adversely affect LU equipment or signalling. e) Details of any changes in loading to LU's infrastructure considering sequence of temporary and permanent works. f) Carry out a staged ground movement assessment (GMA). Assess structure/tunnel impact due to ground movement arising from different stages of temporary and permanent works and associated construction activities. g) Mitigate the effects of noise and vibration arising from the adjoining railway operations within the structures. h) Written confirmation will be required from Thames Water or other water authority that any increased drainage or sewage from the site will not be discharged directly or indirectly into London Underground's drainage system. 	<p>Conditions attached.</p>
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| | <p>2. Before the sub-structure construction stage begins, no works shall be carried out until the following, in consultation with TfL Infrastructure Protection, have been submitted to and approved in writing by the local planning authority.</p> <ul style="list-style-type: none">a) Prior to commencement of each phase of the development, provide detailed design for foundations, basement and ground floor structures, or for any other structures below ground level, including piling (temporary and permanent).b) Site specific Risk Assessments and Method Statements (RAMS) for any activities (groundworks, piling) which TfL may deem to be a risk to LU. Individual RAMS should be issued a minimum of 6 weeks prior to the individual activity commencing.c) Details of any changes in loading to LU's infrastructure considering sequence of temporary and permanent works.d) Update/Complete the staged ground movement assessment (GMA). Assess structure/tunnel impact due to ground movement arising from different stages of temporary and permanent works and associated construction activities.e) No support to be taken from LU's land or structures. <p>3. Before the super-structure construction stage begins, no works shall be carried out until the following, in consultation with TfL Infrastructure Protection, have been submitted to and approved in writing by the local planning authority.</p> <ul style="list-style-type: none">a) Provide detailed design for all superstructure works (temporary and permanent)b) Site specific Risk Assessments and Method Statements (RAMS) for any activities (craneage, scaffolding, use of tall plant) which TfL may deem to be a risk to LU. Individual RAMS should be issued a minimum of 6 weeks prior to the individual activity commencing.c) Details of any changes in loading to LU's infrastructure considering sequence of temporary and permanent works.d) Update/Complete the staged ground movement assessment (GMA). Assess structure/tunnel impact due to ground movement arising from different stages of temporary and permanent works and associated construction activities. | |
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	<p>e) No support to be taken from LU's land or structures.</p> <p>Reason: To ensure that the development does not impact on existing London Underground transport infrastructure, in accordance with London Plan 2021, draft London Plan policy T3 and 'Land for Industry and Transport' Supplementary Planning Guidance 2012</p> <p><i>This response is made as Railway Infrastructure Manager under the "Town and Country Planning (Development Management Procedure) Order 2015". It therefore relates only to railway engineering and safety matters. Other parts of TfL may have other comments in line with their own statutory responsibilities.</i></p>	
<p>Metropolitan Police - Designing Out Crime Officer (DOCO)</p>	<p><u>Section 1 - Introduction:</u></p> <p>Thank you for allowing us to comment on the above planning proposal.</p> <p>With reference to the above application we have had an opportunity to examine the details submitted and would like to offer the following comments, observations and recommendations. These are based on relevant information to this site (Please see Appendices), including my knowledge and experience as a Designing Out Crime Officer and as a Police Officer.</p> <p>It is in our professional opinion that crime prevention and community safety are material considerations because of the mixed use, complex design, layout and the sensitive location of the development. To ensure the delivery of a safer development in line with L.B. Haringey DMM4 and DMM5 (See Appendix), we have highlighted some of the main comments we have in relation to Crime Prevention (Appendices 1).</p> <p>We have met with the design team to discuss Crime Prevention and Secured by Design pre-application stage and discussed our concerns around the design and layout of the development. Further discussions are required.</p>	<p>Condition and informative recommended.</p>

We request that the developer contacts us at the earliest convenience to ensure that the development is designed to reduce crime at an early.

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.

There has been no consultation with our department or subsequent mention of how the development intends to prevent crime when complete. There is no mention of crime prevention or Secured by Design in the Design and Access Statement referencing design out crime.

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:

Should planning consent be granted for this application, we would request the following conditions and informative:

Conditions:

A. Prior to the first occupation of each building or part of a building or use, a 'Secured by Design' accreditation shall be obtained for such building or part of such building or use and thereafter all features are to be permanently retained. Accreditation must be

	<p>achieved according to current and relevant Secured by Design guidelines at the time of above grade works of each building or phase of said development. Confirmation of the certification shall be submitted to and approved in writing by the Local Planning Authority.</p> <p>The development shall only be carried out in accordance with the approved details.</p> <p>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.</p> <p>C. The commercial aspects of the development must achieve the relevant 'Secured by Design' certification at the final fitting stage, prior to the commencement of business and details shall be submitted to and approved, in writing, by the Local Planning Authority.</p> <p>Reason: In the interest of creating safer, sustainable communities. Informative: In aiming to satisfy the condition 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.</p> <p>Section 3 - Conclusion: We would ask that our department's interest in this planning application is noted and that we are advised of the final Decision Notice, with attention drawn to any changes within the development and subsequent Condition that has been implemented with crime prevention, security and community safety in mind.</p> <p>Should the Planning Authority require clarification of any of the recommendations/comments given in the appendices please do not hesitate to contact us at the above office.</p>	
Natural England	SUMMARY OF NATURAL ENGLAND'S ADVICE	Noted.

	<p>NO OBJECTION</p> <p>Based on the plans submitted, Natural England considers that the proposed development will not have significant adverse impacts on designated sites and has no objection.</p> <p>European sites – Epping Forest Special Area of Conservation</p> <p>Based on the plans submitted, Natural England considers that the proposed development will not have likely significant effects on Epping Forest Special Area of Conservation and has no objection to the proposed development.</p> <p>To meet the requirements of the Habitats Regulations, we advise you to record your decision that a likely significant effect can be ruled out. The following may provide a suitable justification for that decision:</p> <ul style="list-style-type: none"> • The proposed site is outside of the 6.2km Zone of Influence (ZoI) for Epping Forest SAC, meaning that the proposal is unlikely to result in a significant increase in visitors/recreational disturbance risks. 	
<p>NHS London Healthy Urban Development Unit</p>	<p>Haringey GPs are under substantial pressure with limited space and recruiting additional clinicians, e.g., pharmacists and physiotherapists, to provide enhanced services to local people. To meet the health needs of the new residents of the proposed schemes, and to limit adverse impacts on existing residents, developments need to provide financial contributions via the relevant S106 agreement for the expansion of health infrastructure serving the locality.</p> <p>The NHS Long Term Plan (2019) and the Fuller Stocktake Report (2022) re-emphasise the importance of providing care close to the community and to provide services on a neighbourhood basis where possible. This means in addition to increasing and</p>	<p>The viability position means there is no surplus to support a contribution to the NHS.</p>

improving primary capacity NHS Trusts are seeking to provide increased facilities and services locally where appropriate.

The HUDU Planning Contributions Model, as set out in the 2021 London Plan, has been used to calculate the cost of mitigation for health. Please note that the HUDU Model does not currently incorporate the impact on Accident and Emergency and outpatient infrastructure nor the impact on the London Ambulance Service and therefore underestimates the cost of mitigation to the NHS.

341A Seven Sisters Road, Tottenham, London, N15 6RD HGY/2023/0728

This scheme comprises 101 bedspaces across two blocks.

We have run the HUDU Model for this scheme based on 69 additional residents which assumes that a proportion of the people will move locally. The final summary information from the HUDU Model is set out below. This shows an overall capital cost of £117,919 with a further revenue cost of £101,171. Discussions with the NHS Trusts and the ICB indicate that expansion of existing sites should be possible and therefore we have reduced the capital cost of mitigation to £65,761. At this stage we are not asking developers to cover the additional revenue costs, however, they should be made aware that there are significant pressures and costs on the NHS of development.

The request is the Council to secure **£65,761** within the S106 agreement to be paid on commencement and indexed linked to building costs.

Final Summary	
Total Capital Cost	£117,919
Total Revenue Cost	£101,171
Combined Cost	£219,090

	<table border="1"> <tr> <td data-bbox="510 199 913 272">Total Number of Housing Units</td> <td data-bbox="981 199 1155 272">101</td> </tr> <tr> <td data-bbox="510 279 913 346">Capital Cost Requirement Per Unit</td> <td data-bbox="981 279 1155 346">£1,168</td> </tr> </table>	Total Number of Housing Units	101	Capital Cost Requirement Per Unit	£1,168	<p>The additional population figures used reflect the different types of accommodation being provided within the schemes and the aim of the Council to meet existing housing need within the borough. The latter assumes that there will a net lower additional population than for many other schemes.</p>	
Total Number of Housing Units	101						
Capital Cost Requirement Per Unit	£1,168						
Thames Water	<p>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.</p> <p>With regard to SURFACE WATER drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water we would have no objection. Management of surface water from new developments should</p>	Noted, conditions and informatives included.					

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>

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

The proposed development is located within 15m of a strategic water main. Thames Water request that the following condition be added to any planning permission. No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface water infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement. Reason: The proposed works will be in close proximity to underground water utility infrastructure. Piling has the potential to impact on local underground water utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need

to follow if you're considering working above or near our pipes or other structures. <https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes> Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk

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

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 5m of a strategic water main. Thames Water do NOT permit the building over or construction within 5m, of strategic water mains. Thames Water request that the following condition be added to any planning permission. No construction shall take place within 5m of the water main. Information detailing how the developer intends to divert the asset / align the development, so as to prevent the potential for damage to subsurface potable water infrastructure, must be submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any construction must be undertaken in accordance with the terms of the approved information. Unrestricted access must be available at all times for the maintenance and repair of the asset during and after the construction works. Reason: The proposed works will be in close proximity to underground strategic water main, utility infrastructure. The works has the potential to impact on local underground water utility infrastructure. Please read our guide 'working near our assets' to ensure your

	<p>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.</p>	
<p>Transport for London</p>	<p>Thank you for consulting TfL with regards to this referable planning application. It is understood that the proposal comprises the construction of two new buildings to provide warehouse living units with additional workspace/ artist studios with associated public realm improvements.</p> <p>I write to provide detailed strategic transport comments on this application reference HGY/2023/0728. These reflect the matters raised in the GLA Stage 1 planning report GLA/2023/0294/S1/01 dated 19 June 2023. Please note that these comments are additional to any response that you may have received from colleagues within different parts of Transport for London (TfL).</p> <p>Site location and context The development is bound by the A503 Seven Sisters Road to the east, which forms part of the Transport for London Road Network (TLRN), Eade Road to the south and Tewkesbury Road to the north; all of which form part of the borough network. The closest section of the Strategic Road Network (SRN) is the A107 Amhurst Park which is approximately 50m to the south of the site.</p> <p>The nearest station is Stamford Hill (London Overground) Station, which is approximately 730m to the east of the site and offers services between Liverpool Street and Enfield Town. Whilst Manor House (London Underground) Station is approximately 850m to the southwest of the site and provides services south to central London and north towards Cockfosters.</p>	<p>No objection subject to recommended conditions and s106/s278 obligations.</p> <p>A contribution cannot be sought due to there being no surplus due to the viability position.</p>

Asset protection is required for the Victoria Line LU line which runs adjacent to the site, beneath Seven Sisters Road. However, there is no Victoria Line station within reasonable walking distance (960m)

There are 4 bus stops within PTAL walking distance of the site (640m), servicing the 253,254,259 and 279 services. The site therefore has a Public Transport Accessibility (PTAL) of 5 on a scale of 0-6b, where 6b is the highest.

Cycleway 1 (C1) is approximately 700m to the east of the site, is the nearest part of the current strategic cycle network. It runs between the City to Enfield.

Trip generation

TfL consider the proposed trip generation and mode share is acceptable in strategic transport terms, subject to addressing the matters outlined below.

Public realm improvements and Healthy Streets works

TfL welcomes the proposed public realm improvements surrounding the site. Currently, the public realm adjacent to the site between Seven Sisters Road and Tewksbury Road is a narrow, poorly lit alleyway. This feels unpleasant for users who also perceive personal safety risks. It is welcomed that the applicant is working with the LB of Haringey to improve the route which acts as a gateway to the wider Warehouse District. The ultimately agreed improvements should be secured in a s106 agreement and/or s278.

Improvements include widening the alleyway, providing improved lighting and cyclist facilities along the alleyway. However, the applicant and the Council should engage with TfL LU Infrastructure Protection to ensure that any changes to the alleyway and in particular its gradient do not impact upon the below ground Victoria Line.

In addition to this, the applicant is proposing healthy streets works including a type of pocket park to the end of Tewkesbury Road nearest their site which are welcomed. In order to support the delivery of this, it is requested that the LB of Haringey revise the

on-street parking and loading controls. The improvements to this road should be secured in the s106 to be delivered via a s278 agreement. The Council should also secure funding to cover the costs of reviewing and implementing changes to the parking and loading controls.

The applicant also appears to be proposing works to Seven Sisters Road which form part of the TLRN but limited detail is provided, more information is required ahead of determination of this application although full details can be worked up and agreed with TfL subsequently. Again, the improvements to Seven Sisters Road should be secured in the s106 agreement to be delivered via a s278 agreement with TfL.

The applicant should refer to TfL Streetscape Guidance when proposing works on TfL highway and TfL wider Streets Toolkit.

TfL also note that the site is approximately 700m to the west of Cycleway 1. TfL request that the applicant should work with TfL and LB of Haringey to improve links between the site and this Cycleway. And likewise the route to Stamford Hill for pedestrians. This is in accordance with Policy T5 of the London Plan.

It is also requested that the applicant should explore improvements to the crossing of Eade Road at its junction with Seven Sisters Road and onward links to Manor House. TfL also consider that there is scope for an improved pedestrian and cyclist crossing of Seven Sisters Road in this location, this would further improve pedestrian and cyclist desire lines.

These improvements would all help mitigate the impact of the development and promote sustainable and active travel, in line with London Plan Policy. They should be secured by s278 agreement with the appropriate authority and/or in the s106.

The applicant has provided an ATZ assessment as part of the submission. TfL welcomes the provision of the assessment however the application should also include a night-time ATZ assessment as part of the submission in order to identify walking and

cycling improvements which may be applicable after dark, particularly relevant given the proposed development and its location.

There is also scope for improvement of the daytime ATZ and the applicant should work with the relevant highway authority to deliver the identified walking and cycling improvements, in line with the Healthy Streets agenda, TfL may seek site specific mitigation for the wider network in addition to works proposed.

Pedestrian, cyclist, and vehicular access

Vehicular

Proposed vehicular access for service vehicles only would be gained via Eade Road, which forms part of the borough highway network. However, the site access point is adjacent to the TfL red route return in which TfL are the traffic authority. Access to the site would be via gates off street. It needs to be demonstrated that these arrangements would not result in queue backs onto Eade Road and Seven Sisters Road

Pedestrian and Cyclist

Pedestrian and cyclist access would be from various points including Eade Road, via gates separate to the vehicle access, the improved alleyway between Seven Sisters Road and Tewkesbury Road and from the rear on Tewkesbury Road. These should be secured by condition /s278 agreement.

Car parking

The redevelopment of the site will result in the removal of surface car parking. The proposal of no car parking is in line with London Plan Policy T6 (Car Parking) and supported by TfL It is particularly appropriate in a location such as this with a high PTAL and good potential access to the strategic cycle network and for improvements to the local links.

Two accessible parking spaces (Blue Badge) are proposed on street and the location should be clarified. All future occupants of the site would be exempt from applying for parking permits except Blue Badge holders and this should be secured via S106.

Cycle parking

It is noted that albeit there are no standards for warehouse living, the applicant considers the cycle parking requirement to be more akin student accommodation. However, TfL consider warehouse living to be most similar to residential dwellings given the greater length of occupancy and all year round living which is not usually seen with student halls and therefore the dwelling requirements are applicable.

The quantum currently being proposed is 1 long stay space per bedroom. TfL consider that in addition to this that the applicant should provide 1.5 long stay spaces for the double bedrooms. For the commercial elements the proposed long stay should be shown on plans to at least meet London Plan minimum standards and the LCDS, both as required in policy T5.

With regards to short stay cycle parking, the proposal adheres to the minimum London Plan requirements.

It is requested that the applicant should re-visit the proposed layout of the provision of long stay cycle parking, It is acknowledged that some existing residents store their cycles within their bedroom. However, TfL do not accept this as part of the provision of the London Plan quantum and this should be addressed within a new build scheme. The London Plan minimums (at least) should be provided in accordance with the London Cycle Design Standards.

Servicing

The existing building, Cara House adjacent to the site is used for warehouse living units. It does not form part of the application site but falls under the ownership of the applicant. However, it is serviced via the existing car park which does form part of the application site. The application is proposing to provide two servicing bays as part of the development to be shared between Cara House and the new building. The land on which existing car parking used by occupiers of Cara House would be incorporated in the development and the spaces would not be reprovided.

The applicant has provided expected delivery and servicing vehicle data which is deemed acceptable and has provided detailed swept path analysis that demonstrates vehicles can enter and egress the site in forward gear. The applicant has also provided cycle parking for the site but has failed to incorporate or highlight potential locations for cargo bike deliveries.

Further detail should be provided on the management of the servicing bays and the route between them and the proposed gates on Eade Road.

It is also noted that given the site constraints, larger vehicles will have to load and unload on the double yellow lines. TfL note that this area is in close proximity to the TfL red route return, where TfL is the traffic authority. The applicant should demonstrate that any large vehicles would not impact the network with swept path analysis and identify and agree a suitable loading location with the LB of Haringey. A detailed Delivery and Servicing Plan (DSP) in accordance with TfL guidance, should be secured via condition.

Travel planning

The inclusion of a Travel Plan in the submission material is welcome, though TfL would like to see ambitious targets for mode shift to walking and cycling which reflect the location of the site.

A Full Travel Plan should be secured and monitored through the section 106 agreement, in accordance with London Plan policy T4.

Construction

The applicant has provided an Outline Construction Logistics Plan (CLP) as part of the submission document. The document outlines key fundamentals of the construction programme and methodology. Whilst noting further detail will be clarified in a detailed document, post submission, the applicant should demonstrate measures to ensure

there will be no impact on London Underground infrastructure. Conditions to protect rail infrastructure will be necessary and provided in more detail.

TfL is concerned that any excavation works or below ground works may impact on TfL highway and other assets. TfL Technical Approval maybe required for such works. TfL recommends that any major structural works adjacent to the TLRN are submitted to Structural Technical Approval to assess.

Additional comments received on 08 February 2024:

I think the [applicant's responses] should not necessarily focus on the peak hour argument. Given the proposed type of use residents and future visitors will coming to the site at all hours of the day, particularly as the site is car free.

With regard to cycle parking, TfL still consider that the tenure is more akin to residential rather than student accommodation and therefore the applicant should provide 1.5 space per two person room as per the screenshot below rather than 1:1. Whilst the space constraints are acknowledged, in order to comply with London Plan policy the applicant should address the shortfall. If the shortfall is unable to be addressed on site, given the type of land use, TfL could consider an offsite provision in the vicinity, secured by the LB of Haringey.

Use Class		Long-stay (e.g. for residents or employees)	Short-stay (e.g. for visitors or customers)
C3-C4	dwellings (all)	<ul style="list-style-type: none">• 1 space per studio or 1 person 1 bedroom dwelling• 1.5 spaces per 2 person 1 bedroom dwelling• 2 spaces per all other dwellings	<ul style="list-style-type: none">• 5 to 40 dwellings: 2 spaces• Thereafter: 1 space per 40 dwellings

	<p>Secondly, regarding the potential improvements to the junction of Eade Road and Seven Sisters Road, TfL consider that in order to be London Plan compliant the applicant needs to improve walking and cycling links to the site. The current junction outside the site is of poor quality and given the expected increase in demand as a result of this development, an improved design should be explored in the interest of pedestrian and cyclist safety. If the improved location falls within the TfL highway boundary, this could potentially be addressed under the s278 works.</p> <p>Thirdly, with regard to links to Cycleway 1, the LB of Haringey should secure improved cycle links from the site via Vartry Road. The assessment would allow cyclists who may not feel comfortable to cycle on busy road, a suitable alternative. The assessment should be carried out in accordance with the TfL Cycle Route Quality Criteria and subject to the outcome of the assessment and the improvements should be discussed further.</p>	
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