

APPENDIX 4: Consultation Responses

Consultee Responses

Stakeholder	Comment	Response
Arboricultural Officer	The protection measures are agreed and a pre-site meeting has taken place to review the tree protection plan.	Noted
Carbon Management	<p>Carbon Management Response 26/04/2024</p> <p>In preparing this consultation response, we have reviewed:</p> <ul style="list-style-type: none"> • Energy Statement: Condition 79a – St Ann’s New Neighbourhood Phase 1B/2, prepared by Hodkinson (dated December 2023) <ul style="list-style-type: none"> ◦ Including the Ground Floor Plan showing (ref. N15302-KCA-ZZ-00-DR-A-10000, Rev P02 dated 27th April 2023) • Appendix B Design Modelling Inputs (dated December 2023) • RMA Phase 1b and 2 Indicative PV plan • District Heating Site Services Layout (drawing N15301-AWA-ZZ-00-DR-U-96018, Rev P02 dated November 2022) • Dynamic Overheating Report – St Ann’s New Neighbourhood Phase 1B/2, prepared by Hodkinson (dated December 2023) • RMA 1 Overheating Response letter, prepared by Lambert Smith Hampton (dated 14th March 2024) • Sustainability Statement – St Ann’s New Neighbourhood Phase 1B/2, prepared by Hodkinson (dated December 2023), including a BREEAM Pre-Assessment • Whole Life Cycle Carbon Emissions Assessment – St Ann’s New Neighbourhood, prepared by Hodkinson (dated December 2023) • Circular Economy Statement spreadsheet • Climate Change Adaptation Strategy – St Ann’s New Neighbourhood Phase 1B/2, prepared by Hodkinson (dated December 2023) 	These outstanding matters will be dealt with through the submission of conditions at a later date.

- Climate Change Report: Landscape Visual Addendum (December 2023)

1. Summary

The development achieves a reduction of 79% carbon dioxide emissions on site, under both Part L 2013 and Part L 2021. This is supported in principle.

However, Carbon Management cannot currently support the application on two grounds:

- Overheating strategy as it currently does not follow the Cooling Hierarchy and therefore does not meet the requirements of London Plan Policy S14 and Local Plan DM21. This was raised and stressed during a meeting with the applicant on 27th February 2024.
- Site-wide plan for the heating strategy, which does not currently show a single point of connection and adequate provision of pipework on the site to accommodate this. This has been repeatedly made clear during the determination of the hybrid application, and subsequently during a meeting with the applicant on 27th February 2024. The information provided is out of date and inadequate.

Some further clarifications must be provided with regard to the Energy Strategy, as requested during the meeting in February 2024. This includes the GLA Carbon Emission Reporting Spreadsheet and confirmation on how the non-residential space performs under Part L 2013.

Some further planning conditions have been recommended to secure the specific requirements of the commercial unit within this phase, which was not secured as part of the outline.

2. Energy Strategy

The overall predicted reduction in CO₂ emissions for the development shows an improvement of approximately 79% in carbon emissions, which has been achieved with both SAP10 under Part L 2013, and SAP10.2 carbon factors under Part L 2021. This represents an annual saving of approximately 348 tonnes of CO₂ from a baseline of 443 tCO₂/year under Part L 2013, and a saving of 301 tCO₂ from a baseline of 379 tCO₂ under Part L 2021.

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: 147.1 tCO₂.

Residential	Part L 2013 (SAP10 carbon factors)			Part L 2021		
	Total regulated emissions (Tonnes CO₂ / year)	CO₂ savings (Tonnes CO₂ / year)	Percentage savings (%)	Total regulated emissions (Tonnes CO₂ / year)	CO₂ savings (Tonnes CO₂ / year)	Percentage savings (%)
Baseline	443.2			379.1		
Be Lean	294.3	148.9	34%	307.3	71.7	19%
Be Clean	166.6	127.7	29%	70.7	236.6	65%
Be Green	95.3	71.3	16%	77.8	-7.1	-2%
Cumulative savings		347.9	79%		301.3	79%
Carbon shortfall to offset (tCO₂)	95.3					

Commercial unit	Part L 2013 (SAP10 carbon factors)			Part L 2021		
	Total regulated emissions (Tonnes CO₂ / year)	CO₂ savings (Tonnes CO₂ / year)	Percentage savings (%)	Total regulated emissions (Tonnes CO₂ / year)	CO₂ savings (Tonnes CO₂ / year)	Percentage savings (%)
Baseline				0.44		
Be Lean			%	0.36	0.1	23%

Be Clean			%	0.36	0	0%
Be Green			%	0.24	0.1	28%
Cumulative savings			%		0.2	47%
Carbon shortfall to offset (tCO₂)				0.2		

Actions:

- Please submit the GLA Carbon Emission Reporting Spreadsheet for Part L 2013.
- Please provide the performance of the non-residential element of this phase for Part L 2013. This unit forms part of the reserved matters remit, and therefore should be included in the energy strategy too.

Energy Use Intensity / Space Heating Demand

The reported EUIs are higher than the GLA benchmark of 35 kWh/sqm/year. The space heating demand appears to be within the benchmark of 15 kWh/sqm/year.

Building type	EUI (kWh/m²/year)	Space Heating Demand (kWh/m²/year)	Methodology used
Residential	41.53	11.67	SAP 10.2 Methodology
Small commercial unit	46.55	3.62	SBEM Methodology

Energy – Lean

The applicant has proposed a saving of 71.8 tCO₂ in carbon emissions (18% and 19% for residential/non-residential) through improved energy efficiency standards in key elements of the build. This goes beyond the minimum 10% and 15% respectively reduction set in London Plan Policy SI2, so this is supported.

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

	Residential new build	Commercial refurbishment
Floor u-value	0.13 W/m ² K	0.09 W/m ² K
External wall u-value	0.18 W/m ² K (0.20 W/m ² K to unheated spaces - corridors)	0.18 W/m ² K (wall) 0.25 W/m ² K (louvre panel)
Roof u-value	0.10 W/m ² K	
Door u-value	0.8 W/m ² K	Not provided
Window u-value	0.80 W/m ² K	1.00 W/m ² K
G-value	0.42 (south, east, west) 0.50 (north)	0.25 (indicative)
Air permeability rate	2.5 m ³ /hm ² @ 50Pa (flats) 3 m ³ /hm ² @ 50Pa (houses)	< 3 m ³ /hm ² @ 50Pa
Ventilation strategy	Mechanical ventilation with heat recovery (MVHR) + natural ventilation - Efficiency 86-87% for noise-affected dwellings - Efficiency 93% for all other	MVHR (1.2 W/l/s Specific Power, efficiency 85%)
Thermal bridging	Accredited Construction Details; ψ -value 0.15 W/mK	
Low energy lighting	100% Energy efficient lighting Target Efficiency of 80 lm/W	A target LED lamp efficacy 110 lm/W and a light output ratio of 1
Heating system (Be Lean)	Gas boilers with gross efficiency of 89.5%	ASHP heating COP of 2.86 and cooling COP of 6.7
FEE improvement	7% improvement, from 30.52 to 28.32 kWh/sqm	

Overheating is dealt with in more detail below.

Energy – Clean

The Be Clean strategy is to connect to the off-site DEN in the future when it becomes available, subject to the terms in the signed Section 106 agreement. A site plan has been submitted to demonstrate the route between energy centres and the site-wide connection point (drawing N15301-AWA-ZZ-00-DR-U-96018).

This is set out in section 6 of the Energy Strategy.

A heat network across phase 1b/2 with air-to-water ASHP system for Phases 1b and 2 (min. SCOP of 3.23) will provide hot water and space heating to the dwellings for 95% of demand (with electric boilers providing the remaining 5%). The interim solution is for a phase-wide air source heat pump-led heating strategy, with 95% ASHP and 5% electric boilers. The energy centre would be located in Block G. A distribution loss factor of 1.05 has been assumed in line with SAP 2012 allowances. This is acceptable at this time, but it should be noted that a Product Characteristics Database submission for a detailed calculation of the losses is required under Condition 74 and so the actual losses for the scheme will be reflected in as built calculations (and the s106 includes a Sustainability Review process which adjusts the carbon offset payment to reflect as built performance).

The interim heating solution results in savings of 29% under Part L 2013 with SAP10 carbon factors, and 62% under Part L 2021.

It is recognised that the heat network has not been fully designed at this time and that further information will be provided under Condition 74. Generally, the assumptions in the energy strategy are appropriate for calculating the likely carbon offset. The planning agreement allows for updated carbon offset calculations with as built information at a later stage and so the assumptions will be updated with more accurate information in order to finalise the offset amount.

Although it is understood that there will be multiple energy centres across the site, it has been agreed that these will be connected to a single network.

It is unclear how this will be achieved as the notional primary network drawing in Appendix F contradicts drawing N15301-AWA-ZZ-00-DR-U-96018 (the site wide district heating drawing).

The notional primary network drawing in Appendix F only shows how the buildings in Phase 1b/2 will connect together. It does not show how the network in Phase 1b/2 shall

connect to Phase 1a nor is there any explanation of how the pipes across phases 1a/1b/2 will allow connection to Phase 3.

Drawing N15301-AWA-ZZ-00-DR-U-96018 is dated from before the hybrid application was approved, and appears to show three separate networks for the three phases. These are interconnected by a network in the ownership of the off-site network (i.e. responsibility and cost for creating a unified heat load across the site has been moved from the developer to the off-site network). This is not what was agreed and is not acceptable.

The three phase networks should rather be connected by the developer to create the agreed single site-wide network. This site-wide network should be designed to facilitate a single point of connection to the off-site network (ideally near the northern edge of the site) and the on-site network should be designed to allow supply to the entire site from this point of connection. The applicant should provide further details to address the interconnection of the phases onto a single site-wide network capable of being supplied from a single point of connection to the off-site DEN network. This has been made clear during numerous meetings and correspondence with the applicant during the determination of the hybrid application, and is reflected in the Section 106 agreement and conditions 28 and 74.

Action:

- Before the energy strategy can be approved, an updated drawing/explanation should be provided for how the energy centres across the different phases will be connected to a single site-wide network delivered by the developer to facilitate future connection (e.g. including details of any hydraulic separation). This should also show the connection of relevant existing buildings (their connection is not currently shown on Drawing N15301-AWA-ZZ-00-DR-U-96018).

Energy – Green

The report concludes that air source heat pumps (ASHPs) and solar photovoltaic (PV) panels are the most viable options to deliver the Be Green requirement. A total of 7 tCO₂ would be increased compared to the notional specifications for renewable energy (-2%) under Be Green measures. This is, in part, because the phase wide ASHP

strategy has been modelled under Be Clean and because there is a high requirement for solar PV to offset the energy demand from the development.

The solar array peak output would be 362.8 kWp, which is estimated to produce around 309,655 kWh/year of renewable electricity per year. The array would be mounted on a roof at a 5-10° angle, facing southerly direction.

Individual ASHPs will supply space heating and hot water to the houses (COP of 3.6). The commercial unit will be supplied by a ASHP with a COP of 4.3.

Actions:

- The commentary on why the roofs of the houses will not have any PV is noted. However, providing PV on dwellings is a common approach across Haringey and London, and this will be a missed opportunity to ensure that the operational energy use and their emissions can be reduced for occupants.
- Please set out the thermal storage amount in Block G for this phase.

Energy – Be Seen

The metering strategy will be further developed at design stage. The total unregulated energy demands have been estimated at 1,418,868 kWh/year from residential, non-residential and landlord supplies.

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

3. Carbon Offset Contribution

A carbon shortfall remains. The remaining carbon emissions will need to be offset at £95/tCO₂ over 30 years with Part L 2013, and this will be dealt with via the relevant planning obligations in the S106.

4. Overheating

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

In accordance with the Energy Assessment Guidance, the applicant has undertaken a dynamic thermal modelling assessment in line with CIBSE TM59 with TM49 weather files, and the cooling hierarchy has been followed in the design. The report has modelled 70 out of 464 dwellings (15%), and 4 corridors under the London Weather Centre files.

The findings of the Part O acoustic review concluded that bedroom windows on east, south and west elevations of Blocks G1, G2, J2 and J2 (highlighted orange and yellow in the acoustic note) must have restricted opening during night time hours (23:00-07:00) in order to ensure internal noise levels remain within Part O limits. Despite these window restrictions required as a result of the noise constraints, the applicant has used criteria for homes that are predominantly naturally ventilated instead of those for predominantly mechanically ventilated.

Some changes have been made since the outline permission to reduce solar gains:

- Living room bifold doors to Block E houses replaced with double doors and a single window to reduce the fixed glazing and solar heat gain;
- Removed fixed panes of glazing below the transom on the south elevations of Blocks G and J, making the overall amount of glazing smaller and ensuring no fixed panes on these elevations, to reduce solar gain;
- Reduced G-value to east, south and west elevations to reduce solar gain;
- Increased the number of operable window panes on the more exposed west elevations to increase natural ventilation; and
- Ensured all window panes are fully operable, inward opening so they can be open to 90o to increase natural ventilation.

Results are listed in the table below.

Domestic: CIBSE TM59	Predominantly naturally ventilated		Predominantly mechanically ventilated	Number of corridors pass
	Criterion A (<3% hours)	Criterion B for bedrooms (less than 33 hours)	Number of habitable rooms pass (<3% hours)	
DSY1 2020s (no window restriction issues)	All pass			All pass
DSY1 2020s (acoustically impacted only)	Modelled but not counted by applicant		Not modelled	
DSY2 2020s	Modelled but not counted by applicant		Not modelled	4 pass
DSY3 2020s	Modelled but not counted by applicant		Not modelled	All pass
DSY1 2050s	Modelled but not counted by applicant		Not modelled	0 pass
DSY1 2080s	Modelled but not counted by applicant		Not modelled	0 pass
<p>The modelling that has taken place has only modelled the unrestricted scenario, and that restricted window openings for those impacted by noise.</p> <p>The following measures are proposed to be built:</p> <ul style="list-style-type: none"> - Natural ventilation in principle, with opening angle of 90° - Assumed closed bedroom windows for worst-affected facades by noise at night, and on 100mm restrictors for less affected windows. - Glazing g-value of 0.42 (east, south and west facades to apartments) and 0.50 (north facades and houses) - External shading currently only provided through overhanging balconies 				

- MVHR with summer bypass (ranging from 30-110 l/s, with higher ventilation levels along the noise-impacted facades)
- Bolt-on cooling (air tempering for peak temperatures) to MVHR levels along the noise-impacted facades
- Passive ventilation in the corridors.

Proposed future mitigation measures include:

- Ceiling fans
- Internal reflective blinds

The submitted overheating strategy is not currently considered acceptable.

The applicant provided further commentary on their overheating strategy. The response on using shading to help reduce overheating risk is not correct nor acceptable. Internal temperatures are built up through various heat sources, including solar gain during the nighttime. Therefore, reducing solar gains during the daytime will reduce the need for purge ventilation at night. This is why the Cooling Hierarchy requires any passive measures to be introduced first, to reduce the risk and need for cooling as much as possible first. Whilst it is acknowledged that the dwellings can pass if there were no constraints on the window openings, the Cooling Hierarchy must still be followed when considering acoustic mitigation (i.e. allowing for airflow), or window restrictions.

GLA Energy Assessment Guidance (2022), under pp 8.10 below, and 8.21, makes this very clear:

- Limitations on openable windows: In instances where security, air quality or noise concerns pose limitations to the opening of windows, applicants will be required to demonstrate that all passive design measures have been thoroughly investigated. This should include technical and cost feasibility assessments of the following fixed shading devices; external shutters, external blinds, awnings and ventilated louvres. Should natural ventilation not be proposed due to opening limitations, applicants are required to submit two separate overheating analyses; one with openable windows and one with closed windows. This will ensure that passive measures have been maximised and the façade design has been optimised regardless of the constraints posed by the site's location. Applicants should demonstrate that the assumptions of the overheating model are aligned with the noise and air quality assessments. Applicants are encouraged to refer to relevant published guidance which draws together these areas including Approved Document O and the *Acoustics, Ventilation and Overheating Residential Design Guide*²⁵ (January 2020).

8.21. It will be expected that applicants can fully demonstrate that all passive design measures have been thoroughly investigated before considering 'active cooling', this should include technical and cost feasibility assessments of the following fixed shading devices; external shutters, external blinds, awnings and ventilated louvres. Where design measures and the use of natural and/or mechanical ventilation are not enough to guarantee the occupants' comfort (in line with the cooling hierarchy set out in London Plan Policy SI 4), the developer should identify the cooling requirement of the different elements of the development in the energy assessment. Please note that this is the space cooling requirement, not the energy used by the equipment providing the cooling, i.e. it is not the electricity used by the electric chiller plant but the cooling energy supplied by the chiller.

The Cooling Hierarchy has therefore not been followed correctly. Modelling has been undertaken assuming that the active cooling solution will resolve any overheating risk in the 2020s. 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, g-values, and increased external shading in places where windows have no overhanging balconies. Furthermore, in the meeting it was acknowledged by our Design Officer that design is not a constraint in adding external shading to the facades at more risk.

Overheating Actions:

- Specify the shading strategy, including: technical specification and images of the proposed shading feature (e.g. overhangs, Brise Soleil, external shutters), elevations and sections showing where these measures are proposed. Then, redo the modelling with these measures integrated into the design.
- Please set out the results in numbers as a summary, based on the number of habitable rooms pass out of the total number modelled. Please also differentiate between the different ventilation requirements (i.e. difference between predominantly naturally and mechanically ventilated). It is very difficult to quantify and assess the results just set out like this in a table. This was also discussed in the meeting in February, and it appears the applicants have not understood what we requested based on their follow up email. The report only includes tables of results, but there is no summary of how many rooms pass or fail, this requires manual counting of the many rows (which takes too much work). The applicant will have these tables in excel format with an easy way to filter out the summary results.
- 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.

We recommend that a planning condition is included to undertake an overheating assessment for the small commercial unit, 6 months prior to occupation.

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 in line with the One Planet Framework. The key principles are: people focused; place-led; new benchmark for housing; highly sustainable design; improved health and wellbeing; community growing and gardening; and child-friendly public realm. It covers all sustainability aspects including transport, equity and local economy, health and wellbeing, materials and waste, water consumption, flood risk and drainage, sustainable food, biodiversity, climate resilience, energy and CO2 emissions and landscape design.

BREEAM New Construction Pre-Assessment

The applicant has prepared a BREEAM Pre-Assessment Report for the commercial unit. An 'Excellent' rating should be achievable according to the Pre-Assessment. The tracker assessed that a score of 74.9% is achievable for all three stages of the BREEAM Communities Assessment, which is an improvement to the 73.04% score at outline stage.

Living roofs

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

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

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

Climate Change Adaptation

A Climate Change Adaptation Strategy has been prepared, setting out the climate risks for this development, with a visual guide to where these measures will be implemented.

Whole Life-Cycle Carbon Assessments

Policy S12 requires developments referable to the Mayor of London to submit a Whole Life-Cycle Carbon Assessment and demonstrate actions undertaken to reduce life-cycle emissions.

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

	Estimated carbon emissions	GLA benchmark RESIDENTIAL	Embodied carbon rating (Industry-wide)
Product & Construction Stages Modules A1-A5 (excl. sequestration)	745 kgCO ₂ e/m ²	Meets GLA benchmark (<850 kgCO ₂ e/m ²) but misses the aspirational target (<500 kgCO ₂ e/m ²).	Modules A1-A5 achieve a band rating of 'E', not meeting the LETI 2020 Design Target.
Use and End-Of-Life Stages Modules B-C (excl. B6 and B7)	252 kgCO ₂ e/m ²	Meets GLA target (<350 kgCO ₂ e/m ²) and aspirational benchmark (<300 kgCO ₂ e/m ²).	
Modules A-C (excl. B6, B7 and incl. sequestration)	997 kgCO ₂ e/m ²	Meets GLA target (<1200 kgCO ₂ e/m ²), but not the aspirational benchmark (<800 kgCO ₂ e/m ²).	Modules A1-B5, C4 (incl. sequestration) achieve a letter band rating of 'D', not meeting the LETI2030 Design Target.
Modules A-C including operational emissions	1,400 kgCO ₂ e/m ²		
Use and End-Of-Life Stages Modules B6 and B7	kgCO ₂ e/m ²	N/A	
Reuse, Recovery, Recycling Stages Module D	kgCO ₂ e/m ²	N/A	

The highest embodied carbon in Modules A1-A3 is attributed to materials (47%) – further efforts to be focused on the façade and general structure. 6% emissions are

due to transport, so there will be efforts to source locally. 15% of all emissions are from the in-use stages, primarily due to the replacement of materials over 60 years. Operational energy makes up 29% of total emissions, including 19% for unregulated use.

The design has also progressed to reduce embodied emissions from the structure, optimising the materials through the PANDA analysis tool. A number of areas have been identified to calculate more accurately and to reduce the embodied carbon of the buildings: reduce material use (volume of non-load bearing walls, durability of materials, maintenance and repair considerations), recycled materials (recycled crushed concrete and gravel, concrete recycling), reuse of materials.

Circular Economy

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

The report goes into more details than the principles approved in the outline permission. The principles used for this development are:

- Sourcing materials responsibly
- Designing for durability and resilience (>60 years)
- Implementing measures to optimise material use on site
- Incorporating recommendations from the pre-demolition waste audit
- Implementing waste minimisation targets during demolition and construction
- Ensuring there is sufficient space for storage and segregation of operational waste
- Designing flexible and adaptable buildings (commercial buildings' use changing between 5-25 years)

The report sets out the Key Commitments (Table 4-1), Bill of materials (Table 4-2) and Recycling and waste reporting form (Table 4-3). This is a fairly high level of information, and the applicant expects this to become more detailed as the detailed design progresses following permission.

The Pre-Demolition and Pre-Refurbishment Audit summarises that the dominant materials on site by weight are 67% concrete, 23% brick, and 5% metals. It is estimated that 5% of materials are suitable for reuse. Where re-use is not feasible, recycling or local waste management options have been identified.

The End-of-Life Strategy is based on repurpose and independent replacement of elements with shorter lifespans than the buildings. To extend the lifespan as long as possible, the strategy is to specify durable and standardised materials, designing for disassembly and reuse at the end of life, storing building information to facilitate disassembly, or refurbishment of buildings. Material passports will describe material characteristics, methods of disassembly and reuse, etc, but its use will depend on the implementation of BIM and the detailed design stage.

6. Planning Conditions

Additional conditions should be secured.

Overheating (Commercial Unit Phase 1b/2)

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.

BREEAM Certificate (Commercial Units Phase 1b/2)

- a) Prior to commencement on site for the relevant non-residential unit, a Design Stage Assessment and evidence that the relevant information has been submitted to the BRE for a design stage accreditation certificate 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.*
- b) Within 6 months of commencement on site for the relevant non-residential unit, the Design Stage Accreditation Certificate must be submitted. 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.*
- c) Prior to occupation, the Post-Construction Stage Assessment and tool, and evidence that this has been submitted to BRE should be submitted for approval, confirming that the development has achieved a BREEAM “Very Good” outcome (or equivalent), aiming for “Excellent”, subject to certification by BRE.*
- d) Within 3 months of 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.

Carbon Management Response 22/05/2024

In preparing this consultation response, we have reviewed:

- Letter prepared by Lambert Smith Hampton (dated 17th May 2024), titled: RMA 1 Overheating Response 2 - Cost and Feasibility Study into Further Passive Cooling Measures

Energy

- The applicant has not provided the Part L 2013 carbon reporting spreadsheet for the non-residential element.
- The updated plan does not show the connection of relevant existing buildings.
- The applicant has not provided the thermal storage amount in Block G for this phase.
- The applicant has not demonstrated that the planning stage energy performance data has been submitted to the GLA webform for this development.

Overheating

Following another meeting with the applicant on 9th May to explain what is expected, the applicant submitted the abovementioned letter.

The letter acknowledges that at RIBA Design Stage 2, the applicant disregarded the investigation of any passive measures in favour of progressing an active cooling solution. This confirms the issue that Haringey has raised that the Cooling Hierarchy was not properly followed during the design stages.

The letter covers modelling results (based on closed windows) for 5 external shading options, cost analysis for shading measures and an estimate on what the cost implication might be on service charges.

It is questioned what is included in the 340 windows (and why this would need to be increased to 450 windows for the whole facades). It is assumed that windows/doors already covered by balcony overhangs would not need to be included.

The assessment is missing cost information for the proposed measures, it is therefore not contextualised. It is also questioned how the figures for the service charges have been estimated, as it assumes that the initial cost for these measures is paid for by the occupants and not the developer. It is worth reminding the applicant that the development must be policy compliant, which includes the need to reduce the overheating demand as far as possible before considering mechanical and active cooling measures. Therefore, shading measures are part of the policy-compliant baseline costs.

It is not clear which shading measures were implemented in the modelling for which rooms, i.e. particularly in relation to their orientation as some measures might be more appropriate than others.

Lastly, other acoustic mitigation measures were not fully looked into, to improve the natural ventilation opportunities. This may include acoustic panels or vents.

Shutters are discounted for various reasons:

- lose situation for developers – this is required as part of a policy-compliant scheme
- lose situation for end user – as part of the building user guide, there is a role to play to raise awareness of the function and benefits of shutters. These is typically an easier to understand solution than the technical solution of temperature lopping will be.

The note does not set out how the cooling demand would be reduced, would 1.5kW system capacity be reduced?

Conclusion

This scheme will need to demonstrate compliance with Policy SI3 and SI4, and therefore this additional planning condition is recommended to incorporate further

measures to make this scheme acceptable. Otherwise this application cannot be supported.

Connection of existing buildings to heat network

The applicant must demonstrate that the major refurbishment buildings will be connecting to the site-wide network through the provision of evidence demonstrating this connection (through plans, diagrams etc).

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.

Overheating Risk (Domestic)

Prior to the above ground commencement of development, a revised overheating model and report shall be submitted to and approved by the Local Planning Authority. The model will assess the overheating risk in line with CIBSE TM59 (using the London Weather Centre TM49 weather DSY1-3 files for the 2020s, and DSY1 for the 2050s and 2080s) and demonstrate how the overheating risks have been mitigated and removed through design solutions. These mitigation measures shall be operational prior to the first occupation of the relevant phase hereby approved and retained thereafter for the lifetime of the development. Air conditioning will not be supported unless exceptional justification is given.

This report will include:

- Incorporate further passive design measures (including at least acoustic mitigation and external shading) to reduce the overheating risk before applying mechanical and, where necessary, active cooling solutions.*
- Specifications of the design measures incorporated within the scheme in line with the Cooling Hierarchy.*
- Confirmation who will be responsible to mitigate the overheating risk once the development is occupied.*
- Modelling and feasibility of measures that form part of the retrofit plan to mitigate the future risks of overheating by confirming that the retrofit measures can be integrated within the design (e.g., if there is space for pipework to allow*

	<p><i>the retrofitting of cooling and ventilation equipment) and include any replacement / repair cycles and the annual running costs for the occupiers;</i></p> <p><i>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.</i></p> <p>Having considered the applicant submitted information relevant to this service including; Planning Statement prepared by Lambert Smith Hampton Ltd, dated 1st December 2023; Reserved Matter Compliance Statement, prepared by Lambert Smith Hampton Ltd, dated December 2023; Design and Access Statement with reference N15302-KCA-XX-XX-RP-A-00002, prepared by Karakusevic Carson Architects, dated 27th November 2023; Environmental Impact Assessment (EIA) Compliance with reference 333100157/E1/EH prepared by Stantec UK Limited, dated November 2023 and taken note that the above application is in accordance with the outline parameters assessed in the submitted ES, please be advised that the we have no objection to the proposed development in relation to AQ and Land Contamination regarding the information submitted to satisfy conditions 63 (Reserved Matters Compliance Statement) , 65 (Drawing References), 66 (Cycle Provision), 67 (Accessible Housing), 68 (Fire Statement), 69 (Ecological Impact Assessment), 70 (Circular Economy Statement), 71 (Surface Water Drainage Scheme), 72 (Boundary Walls) and 73 (Climate Change Adaptation).</p>	
Conservation	<p>this is a detailed application for the proposed development of the southern phases 1b and 2 forming part of the extensive redevelopment of the historic St Ann's Hospital site. The northern part of the development site is located within St Ann's Conservation Area characterised as a mid-19th century pre-railway development of Tottenham along one of the historic east-west routes connecting with Tottenham High Road. The large landscaped open space of Chestnuts Park fronts the wider development site and derives from the grounds of Chestnut House, a mansion dating from the 1850s that was demolished in the 1980s. Chestnut Park forms an attractive and well used public green</p>	Noted

space characterised by its sense of openness and by its mature trees, shrubs, railings and historic gates and gate piers that define its boundary.

The eastern stretch of the Conservation Area includes the locally listed piano factory building located on the north side of St Ann's Road at 182-184 St Ann's Road, the locally listed former St Mary's Priory located on the south side of St Ann's Road at No 277 where it stands in front of an important group of statutory listed buildings including St Ann's Parish Church, St Ann's School, and 1-5 Avenue Road. In closer proximity to the development site, at the junction of St Ann's Road and Hermitage Road still survives the locally listed St Ann's Police Station, converted into residential use as part of a new development along hermitage Road. The Conservation Area is also characterised by the later Victorian buildings of the St Ann's Hospital site and by Chestnuts School which is an impressive example of the work of the Tottenham School Board.

The St Ann's hospital site dates from the 1890s and has its origins as a Metropolitan Asylums Board fever hospital. Most of the buildings located within the site and in the conservation, area are the remnants of the original Victorian hospital, which was redeveloped in the mid-20th Century. These historic buildings are set behind the historic, brick boundary wall with brick plinth and copings and a series of buttresses and piers which enclose the southern side of St Ann's Road thus contributing to define its character.

The enclosed hospital site is perceived as part of the historic environment of the Conservation Area due to glimpses of those original hospital buildings that sit behind the boundary wall where the mature vegetation complements the green character of Chestnuts Park.

The original hospital buildings that characterise the Conservation Area are the locally listed Orchard House and Mayfield House together with the positive contributors Acacia House, Mulberry House, East Gate Lodge and West Gate Lodge.

The boundary wall of the hospital site provides a distinctive sense of enclosure along St Ann's Road, and the perceived separation between the hospital site and the residential development in Conservation Area are established, positive features of the area.

The Site is bounded to the east by the refurbished St Ann's Hospital Site with buildings of various style ranging from 2-3 storeys to the south it is bounded by the Overground railway line and to the west by the rear gardens of properties fronting Warwick Gardens.

The detailed application for the northern development phase 1A within Conservation Area was approved in 2023 as part of a Hybrid application that also included the Outline application for the following development phases 1B, 2 and 3 whose appearance, landscaping, layout, and scale were reserved for subsequent determination at Reserved Matters stage.

The Hybrid application ensured maximum retention of both those locally listed and those historic buildings that positively contribute to the character of the Conservation Area, retained the defining boundary wall to the site and the enclosed and leafy character of the St Ann's frontage of the hospital and Outlined a progressively taller new development towards the south of the wider site.

Retained buildings outside the Conservation Area were set to become focal points for new streets and spaces tied together by a consistently re-designed landscape that balances with its soft openness the spatial and visual relationship between retained and new buildings; the pivotal design of the generous Peace Gardens centrally located within the wider development site will positively mediate between the development in Conservation Area and the emerging taller development proposed to the immediate south of the Conservation Area boundary.

The approved Hybrid scheme involved various development plots and various building typologies meant to respond to the character of retained buildings and places, but also to create new character within in the wider development site and to bring definition to the spaces between the buildings.

This Reserved Matters Application (RMA) further develops the design of the southern phases of development 1B and 2 that extend to the immediate south of the scheme-defining Peace Gardens and includes the erection of new buildings for residential, commercial business, service, local community and learning uses, altogether with associated pedestrian and cycle accesses; landscaping including enhancements to the St Ann's Hospital Wood and Tottenham Railside's Site of Importance for Nature Conservation (SINC) car and cycle parking spaces and servicing spaces.

The new buildings in phases 1B and 2 promise to complement and complete the approved development in Phase 1A, whose retained Admin Building and Water Tower sit in close proximity to the RMA development that will frame the southern side of the Peace Gardens, will constitute the visual backdrop to The Admin Building in southern views across the wider development site, and will complete the definition of the axial Primary Street West characterized by the retained Water Tower .

The illustration of the transition from the scale of development in Conservation Area to the taller built environment framing the Peace Gardens and the illustration of the urban and architectural relationship between approved phase 1A and RMA phases 1B and 2, including the assessment of the heritage impact of proposed development, rest both on the information provided at Hybrid application stage that included Sitewide Masterplan and Sitewide Sections, sketches and CGI's of the whole Masterplan, Built Heritage Statement and TVIA as well as on contextual drawings to scale 1:500, 1:250 and 1:100 and images included in the Heritage Statement and Design and Access Statement forming part of this RMA application.

Views of The Admin Building and of the Water Tower as experienced from Phase 1A and their spatial and architectural relationships with new buildings and places in Phase 1B and 2 is captured in CGI Views and sketches included in the Design and Access Statement submitted with this MA application.

Conservation comments for the Hybrid consent concluded that the new development would provide an unprecedented, taller, and denser built background to the retained heritage buildings in southwards views across and out of the Conservation Area, it will have a minor adverse impact on the setting of the Conservation Area, and this will lead to a low level of less than substantial harm to its significance. These conclusions related to the assessment of the entire masterplan based on detailed design information for phase 1A and Outline design for phase 1B and 2. The heritage assessment triggered the need to weigh the harm against the public benefits of the proposal while placing great weight on the asset's conservation irrespectively of the level of harm to its significance.

This RMA application now provides greater design definition in relation to the tallest development Phases 1B and 2 and greater clarity about the consistency of design quality and connectivity between retained heritage buildings and new development that complies with the masterplan, parameter plans and design codes approved at Hybrid application stage and this is extensively illustrated in this application through group elevation drawings and images included both in the submitted Heritage Statement and in the Design and Access Statement. The architectural merits of phase 1B and 2 as fully compliant with the design guidance set at Outline application stage, and the landscape design quality of the proposed scheme are clearly articulated in the design officer's comments to this application and are acknowledged as potential mitigators to the

	<p>heritage impact. However, the impact of new development is largely due to its scale and height as perceived in the visual setting of the Conservation Area, and the level of design detail provided in this RMA application does not allow to fully appreciate how the detailed design of new buildings neighbouring the historic Admin Building and The Water tower has been directly influenced by the retained buildings and will possibly reinforce their presence within a substantially different and more imposing built environment. Accordingly, and based on the information provided with this RMA application, it is concluded that the proposed development in phases 1B and 2 will lead to a low level of less than substantial harm as anticipated at Hybrid consent stage, and the test indicated at paragraph 207 of the NPPF applies together with all the other relevant national and local policies.</p>	
<p>Design</p>	<p><u>Summary</u></p> <p>This application is for reserved matters approval for a substantial portion of the development that was granted outline approval in the previous hybrid permission. The proposals are in accordance with the Design Code and Masterplan previously approved, that will ensure it's compatibility with the detailed elements previously approved, for what will rapidly become a major new neighbourhood characterised by elegant, coolly detailed, durable and robust residential buildings framing retained heritage buildings from the former hospital housing community and business uses, amidst spectacularly high quality landscape features. The homes created in this phase will be at least as good quality, attractive, durable and supporting fulfilling, sustainable living, as those in the previous permission, including similar townhouses and flats within mansion blocks, as well as flats in pavilion buildings partially embedded into expanded existing natural woodland. Design quality is high, and has been commended by the council's independent, objective, expert Quality Review Panel, with all concerns resolved to design officers' satisfaction.</p> <p><u>Location & Planning Policy Context</u></p> <ol style="list-style-type: none"> 1. The St Ann's Hospital is a large, walled, historic hospital compound in the south-centre of the borough, approximately mid-way between Green Lanes to the west and Seven Sisters to the east. Its long northern boundary is the southern side of St Ann's Road, a major east-west street connecting Green Lanes with South Tottenham, and its long southern boundary is the embankment of the Gospel Oak to Barking railway line, used for the London Overground Suffragette Line and 	<p>Comments noted.</p>

goods services, whilst it's shorter eastern and western boundaries are to residential streets and the backs of terraced houses. In recent years the health service has, in consultation with the council and other stakeholders, been redeveloping parts of the hospital, gradually moving health facilities into just the eastern half of the site.

2. This application is for Reserved Matters Approval for a part of a site previously granted Outline Approval, as part of a Hybrid Planning Permission, [HGY/2022/1833](#). That hybrid permission included full planning permission over part of the site, outline permission over the rest, following a single coordinated Masterplan, and the outline portion included a Design Code, which form part of the approved documents, and should help align and coordinate the outline sections of the site with the detailed design, form, and layout of the detailed portion of the site. The Masterplan is a coherent proposal that should successfully integrate the proposed development into its contrasting surroundings and improve connectivity. It demonstrates that the heights and built forms proposed would build up gradually from the prevailing two storey residential terraces to its west, interspersed as they are with three to five storey flatted blocks, and to the similar height but more campus-like retained hospital estate to the east. A phasing programme is included in the masterplan, indicating the works proceeding in an anticlockwise direction, from the detailed phase to the south-western corner, then to the south-east, finishing at the north-eastern corner. This is appropriate as it will limit disruption to existing residents and roughly time the later phases alongside later phases of the continuing hospital's works.
3. The Hybrid Approval built upon several prior years of detailed discussions between the hospital owners (the Health Authority), the council, the Greater London Authority, the local community, and prospective developers. The Health Authority first commissioned a masterplan from Broadway Malyan 2012-2015, for the residential development of the western half of the existing hospital site, developed in consultation with council officers and granted planning permission in March 2015 (HGY/2014/1691, now expired). This was used to market the site to potential developers, whilst at the same time a community group developed a rival proposal for the site. This GLA then brokered a deal involving both of these applicants. At the same time and since, the Health Authority have been

developing projects and carrying out their construction for the consolidation of the health care services on the retained hospital site, including a design award winning new Blossom Court mental health inpatient wards, amore recent Imaging Centre and a number of smaller projects to adapt and update existing buildings and remove any facilities or plant relied on in what is now to be the residential development site.

4. Council officers, including this Design Officer, have been fully involved in pre-app and other discussions on all the above schemes, and it has been reviewed by Haringey's independent, objective, expert, Quality Review Panel (QRP) four times at hybrid application pre-application and application phase and once at the pre-application phase for this reserved matters application, with the conclusion of those reviewed being positive. For this application, the QRP were wholly and enthusiastically supportive of the proposals they saw, but with a few minor and detailed concerns, all of which have been addressed in amendments and further justification by the applicants, fully to officers' satisfaction.
5. The site is allocated in the council's Local Plan, Site Allocations DPD (adopted July 2017) as SA28: St Ann's Hospital Site, for "Enabling residential development to rationalise and improve the existing hospital site". Site requirements are for the existing boundary wall to be integrated into the development, areas of SINC in the south of the site should be enhanced, the site developed as residential in order to enable a rationalisation and enhancement of the health facilities, a new connection towards Green Lanes provided at the south west corner, integrated into the cycle and pedestrian network, provision for a north-south route through the site, preserve and enhance the character of the conservation area, its significance, and its setting as per the statutory requirements, and provide new open space on the site which complements the nearby Chestnuts Park. Development guidelines include heights reduced to respect the amenity of neighbouring Warwick Gardens, and potential for being part of a decentralised energy network. Officers consider this proposal, like all those previous proposals mentioned above, to be wholly in accordance with the Site Allocation.

Structure of the Application

6. This is the second phase and the first Reserved Matters Application to be submitted to the Council for planning approval, although it is labelled Phases 1b,

2 & 3, for the applicants own reasons, irrelevant to consideration of the application. There remains a similarly sized portion of the approved development that has not been submitted for Reserved Matters and therefore remains only in Outline Approval, to the east of the site, north-east of *this* application, which may be submitted in future for one or more subsequent reserved matters applications. As this application is for Reserved Matters, several matters are already considered to have been decided in the Hybrid Approval, and several others are only under consideration inasmuch as they are in accordance with the approved masterplan and design code. Matters decided in the hybrid approval or subject to the Masterplan/ Design Code are itemised below.

7. The following issues were decided in the hybrid planning permission and are not changed in this reserved matters application:
 - 7.1. Use; including the range of uses, which specifically for this application is overwhelmingly residential, with just one small business unit (Class E) in the south-western corner. A significant quantum of non-residential uses was included in the detailed portion of the hybrid permission, focussing on the retained buildings.
 - 7.2. Residential mix; including affordable / market housing, specific types of affordable housing offered, and the range of sizes of units in each, with the quantum and range of affordable housing continuing to be widely praised, including specifically by the QRP.
 - 7.3. Height; including the strategy of concentrating height around the edge of the central park (Peace Garden), including blocks H2 & 3 in this phase, and the pavilions along the southern edge of the site, all in this phase. Heights agreed also include tight detailed height ranges as part of the parameter plans, effectively absolutely defining possible heights of this reserved matters to those previously approved.
 - 7.4. Block pattern; in strategy and again in tightly defined approved parameter plans.
 - 7.5. Access, including site access points from the north and, for pedestrians and cyclists, south-west, and detailed building access strategy in the illustrative scheme and in detailed codes in the design code.

8. These further issues are only to be decided in this application as to whether the detailed proposals are in accordance with the approved Masterplan & Design Code:

- 8.1. Detailed Layout, which is covered in the design code, and for both the townhouses (in this Plot E), and mansion blocks (in this, Plots F & H) follow extremely closely virtually identical blocks already designed in the detailed portion of the hybrid permission (plot B for Plot E & Plot C for Plots F & H). Nevertheless, there are details, that are different between them, for which it is relevant to consider whether these reserved matters match up to the masterplan, design code and corresponding detailed designs from the hybrid approval, whilst Plots G and J, "The Pavilions" are in a typology unique to this phase.
- 8.2. Elevational Composition, similarly to detailed layout, with a clear model to follow for the townhouses and mansion blocks, and general principles for the pavilions.
- 8.3. Materials & Detailing, again similarly to detailed layout.
- 8.4. Landscaping, also covered in the design code and masterplan but detailed here for the first time for these elements, whilst considering that the greatest distinctiveness of the whole St Ann's development is to be found in the generous and high quality landscaping, with the buildings generally forming more of a background. Whilst the main central park space for the development, the Peace Garden, is detailed in the hybrid permission, and the designs of most of the streets of this reserved matters application follow those of the streets in the hybrid permission, the expanded woodland along the southern boundary is a major landscape feature only found in this phase, as are the spaces between the pavilions and the green street, which together draw the woodland into the heart of the site, are also unique to this phase.

Design Code

9. The Design Code is an Approved Document, giving it greater weight in considering this and future Reserved Matters applications than the Design & Access Statement. As such it is crucial to ensuring that future phases will be built

out to at least as good quality as the initial phases for which detailed planning permission was granted. In general, officers consider the Design Code (DC) is a really high-quality document that promises to be extremely powerful and useful in supporting and protecting high quality design and a coherent design across the development, tying the later phases, only previously applied for in outline, to the earlier phases approved previously in detail.

10. The document is structured with Site Wide Codes, Landscape Codes and Architectural Codes. The general principles within the Site Wide codes are excellent, placing some of the more detailed Conservation Area principles within the Site Wide codes, especially crucial views, giving them a welcome prominence. To avoid them being forgotten in the Architectural and Landscape Codes, there is cross referencing throughout. Codes are described as either **must** or **should** be carried out. Unlike many other Codes, **may** is never used, to give greater certainty, but reasonable flexibility in implementing the outline portion. Officers consider the most crucial elements are definitive.
11. The Design Code is particularly strong on landscaping, both hard and soft, with a long and detailed section on Landscape and Public Realm coding, to reflect and help to implement the overall intention for the development to be led by the green and natural landscape, and to be designed around the importance placed on preserving key existing trees and areas of landscaping within the site.

Detailed Layout

12. The townhouses (Plot E) have almost identical plan except for open plan living dining kitchen as they are for market sale, whereas Plot B have separate dining kitchen as they are for social rent. They have no differences in external appearance, promoting excellent tenure blind social integration.
13. The mansion blocks (Plots F & H) follow the same “classic city block” pattern of development as the equivalent mansion blocks in the detailed portion of the hybrid permission (Plots C & D), with two blocks wrapping most of the way around a central shared private courtyard garden, open apart from railings and gates at two sides aligned to provide views out and through and support placemaking. However, each plot’s precise layout responds to specific context, with one corner of Plot F, like a different corner of Plot D, opening up to form a pocket square, the “Birch Grove”, facing the retained water tower and around a

cluster of retained specimen trees, whilst the north faces of both Plot H, like the east face of Plots D, form taller point blocks facing the Peace Garden and animating a Neighbourhood Square, detailed in the hybrid permission, forming the busy south-western corner of the Peace Garden. Their internal layouts are similar, with central corridors around some single aspect, mostly dual aspect through and corner flats. In response to QRP concerns at some instances of dog-leg corridors, some simplifications of internal layout have been achieved, ground floor flats with their own access off the street have been maximised, and to their concerns about privacy of street facing ground floor bedrooms, defensible street-edge landscaping has been enhanced.

14. The pavilions (or villas) are not a typology designed in detail in the hybrid permission, unlike all others, but are designed in outline in the masterplan and illustrative scheme, and closely defined in the parameter plans and design code, which define their height, bulk, and approach to layout. Nevertheless, their detailed layout, including that of the commercial unit facing the south-western square in Block G1 are detailed in this reserved matters application. Most of the layout decisions are fixed in the outline proposal, including having five flats per floor, locating the main site-wide energy centre in two of them and in a single storey structure between the two (G1 and 2), and having a retail / commercial unit on the ground floor of G1, essential to provide animation and activity in the South West Square, where the South Western Entrance (included in the detailed part of the hybrid permission) enters the site from Stanhope Gardens.
15. In response to concerns from officers and the QRP that the initial reserved matters proposals for this unit did not sufficiently provide this animation, the amount of glazing to this unit has been increased, its' main customer entrance has been placed on a faceted corner so it will address both the Primary Street (to its north) and the square, and the reconstituted stone / concrete facia / sign zone has been extended, whilst the landscaping proposed for the square has been modified to ensure, especially if, as is hoped, the unit has outdoor seating in the square, pedestrian movement desire lines do not cross planting. This should provide some considerable reassurance that the unit can provide good animation to the pedestrian and cyclists' entrance, and attract footfall to the square, provided an operator can be attracted to the unit very early on, preferably as soon as the unit is completed. The QRP noted it would be strongly advisable for the

landlord (Peabody) to secure a tenant even at a loss at first, although this will await their commercial strategy, which is promised “in due course”.

16. Overall, residential and commercial detailed layouts in this reserved matters application promise to match the high quality detailed layouts in the hybrid permission, with a convincing commercial unit capable of animating the south-western square, provided it is let early to the right sort of business, and high quality new homes, indistinguishable between market and affordable (in several different tenures). As is to be routinely expected, all room and flat sizes meet or exceed statutory minima and are provided with plentiful private external amenity space. Day and sunlight levels, privacy from overlooking and being overlooked along with interesting outlook are all thought about carefully and achieve good results.

Elevational Composition

17. The townhouses are designed to appear as identical to those in the hybrid permission (Plot B). The house on the southern end of the row contains more additional side windows than those of the northern end and the ends of the rows in the hybrid permission, in recognition of its additional need to provide passive surveillance to the south-western square.
18. As noted above, the mansion blocks of Plots F and H follow closely the designs of those of Plots C & D approved in detail in the hybrid permission that included an illustrative scheme, parameter plans and design codes further requiring matching designs, including their elevational composition. The only differences are where their detailed locations suggest elaboration. The gable ends of Blocks F1 and F2 onto the Birch Grove feature contrasting brick and reconstituted stone cornices, whilst the northern end of Block H2, facing the Neighbourhood Square that forms the south-western corner of the Peace Garden, and with the retained former Admin Building in front but offset to its right, is significantly elaborated with an offset main entrance central to the part of its elevation visible, and with the most ornamental facade composition within the rules of the design code, appropriate to its pivotal position.
19. That Pavilions are a unique and different typology to any detailed in the hybrid permission, but in accordance with the masterplan, parameter plans and design codes then approved for them, retain the consistent, composed, brick-based

architecture of the wider development. But the pavilions are distinguished from the street-lining mansion blocks of the majority of the St Ann's site, in recognition of their urban morphology being object-type buildings set within natural or fairly natural surrounding landscape. This also responds to QRP concerns that the pavilions be more distinctive.

20. To achieve this distinctiveness within the consistent language across the new neighbourhood, brick detailing to the pavilions has been substantially further elaborated, including with rustication, contrasting bricks, elaborated, grouped and recessed windows, and fully projecting balconies, as described below under detailing. The enclosure of the rooftop plant to Block G2 has been designed to be reminiscent of the retained water tower, which is a contextually appropriate, honest expression of the character and use of that block, containing the site-wide energy centre. Southern elevations do not appear as backs, but just as elaborated as northern elevations, so that when viewed from the paths through the woodland and more significantly from the railway they will not appear as though they are the back of the development.
21. Overall, the elevational composition of the buildings of this reserved matters application do not mark a dramatic change from those approved in the previous hybrid permission, with even the more unique and object-like Pavilions being clearly and recognisably of the same language of composition. Design officers consider the consistency of the architectural approach to be a strong virtue of the scheme overall, emphasising the primacy of the retained existing buildings and range of landscaped spaces, to which the new predominantly residential buildings will provide a frame, setting and background, whilst providing elegant, attractive, and distinctive homes.

Materials & Detailing

22. Intrinsically connected to the elevational composition points above, the various plots of this reserved matters application have the same considerations and relations to the approved hybrid permission, its detailed design portions, masterplan, illustrative scheme, and design code. Much more than that though, it has been made clear throughout, and is defined in those hybrid permission approved documents, that the materials and detailing of all phases of the St

Ann's development are defined in that hybrid permission, or subject to conditions of that planning permission.

23. In particular, current application HGY/2024/0148 seeks discharge of Condition 56 (i) (External Facing Materials – Bricks Only) attached to Planning Permission Ref: HGY/2022/1833, the hybrid permission. This Design Officer has attended site to inspect brick sample panels, displayed in conjunction with colour swatches for joinery and metalwork proposed, for all buildings within the development, and indicated that they are considered acceptable; durable, attractive in appearance and in accordance with the proposed development. They also looked good and appropriate in context with the samples / colour swatches relevant for the joinery & metalwork throughout the development. There will also be a series of concrete / reconstituted stone for which samples will need to be approved, but it would therefore be appropriate for the same materials to be used in this and the remaining stages as those already chosen and approved for the first phase (i.e. for the detailed portion of the hybrid permission).
24. For building details, for the townhouses and mansion blocks, much of the same conditions will apply, that the key will be that the same or virtually indistinguishable details are used in this & subsequent phases as are used in the 1st phase detailed in the hybrid permission, in order to maintain consistency across the development. Nevertheless, this phase contains the pavilions, which are a unique typology in the wider development, giving rise to a few specific concerns with respect to their detailing, due to their woodland edge location at the southern edge of the site, overlooking the railway and acting as objects in space rather than street lining blocks.
25. The QRP suggested that the pavilions should be more distinctive and different in architectural expression and materials, reflecting their naturally landscaped setting, perhaps using other materials than brick. They also noted concerns that the pavilions' southern location, open aspect and that one of their 5 flats per floor is single aspect south facing, made them vulnerable to overheating, especially given the railway just to their south might make open windows noisy. The applicants' architects have strenuously defended their preference for the pavilions still being predominantly in brick, to protect the overall consistency of this new neighbourhood, in view of the proven durability and attractiveness of that material, and its compatibility with the retained heritage buildings and wider brick

dominated surrounding character. However, they have further modified the brick detailing to create greater contrast between the pavilions and the mansion blocks. Contrasting brick entrances and footings, rather than full storeys of dark brick on the mansion blocks, light contrasting brick banding to the proposed buff brick (central) villas, referencing the Peabody heritage, that detail being common to the many Peabody estates across London, a rusticated ground floor to the red brick villas (G1, J2 & 3), dramatic triple window details to the top floors, with recessed panels between, and brick reveals to the top floors rather than concrete to the mansion blocks, all should give the pavilions a distinctive contrasting character.

26. Balconies to the south facades to the pavilion have also been made fully projecting, giving better shading to rooms below them, in response to the QRP and officer's overheating concern, giving residents greater engagement with their landscaped setting and the buildings reflecting their object-in landscape rather than streetscape character, whilst these projecting balconies combined with the elaboration to the top floors should ensure they are not, as the QRP were concerned, read as the back of the development, but as another frontage. A comprehensive series of ventilation measures to accommodate the unavoidable presence of a few single aspect south facing flats in these blocks include making all their windows openable, use of lower G-values of 0.42 to their glazing (reducing sunlight overheating), MVHR with cooling bolt-on and a detailed overheating assessment proving this will not be a problem; but for details of this please refer to the Sustainability Officers' comments.
27. Design Officers are satisfied that the pavilions' materials and detailing will be distinctive and attractive, appropriate to their landscaped setting and objects-in-landscape character, whilst remaining consistent with the character and high quality of the rest of the development.

Landscaping

28. Aspects of the proposed landscaping, particularly the Primary Street around the development and the Gated Courtyards at the heart of the urban blocks (plots F & H), follow the designs previously approved in the hybrid permission, but the majority of their landscape elements of this phase are unique. These comprise the "Birch Grove" pocket park, the "Green Link" wooded swale street, the smaller

pocket parks between the pavilions and the wooded SINC (Site of Importance for Nature Conservation). Landscape designs for the Primary Street and Gated Courtyards within this reserved matters application are also functional and unremarkable, whereas it is the range of unique spaces, particularly the Peace Garden (approved in the hybrid), the SINC (in this), the four or five smaller public squares (one of which is in this, or two if the South-West Square is counted as separate from the SINC), and the Green Link (also in this).

29. The existing woodlands along the southern edge of the site, against the shallow embankment of the Gospel Oak to Barking railway line (London Overground Suffragette Line) is designated as a Site of Importance for Nature Conservation (SINC, of Local significance). The railway tracks and both embankments themselves are also designated as SINC (Grade II, a higher designation), as well as an Ecological Corridor, recognising its value to biodiversity both as habitat and movement corridor. It is planned, under the approved masterplan, parameter plans and design code, to be expanded northwards further into the site. It will be managed by a wildlife trust, and a light fence that will not be particularly visually intrusive but will provide clear psychological and gently persuasive separation from generally accessible public realm, including the South-West Path, to officers and QRP satisfaction, which should balance well conservation needs with its role providing amenity to residents.
30. The spaces between the pavilions further extend the natural, wooded landscaping and biodiversity opportunity into the site, then connecting via the wooded swale of the Green Street into the central Peace Garden, setting up a new ecological corridor connected to the existing one. The "Forest Garden" between Blocks G2 and J1 will be particularly effective at this, but the "Villa Court" between J1 and 2, a predominantly wooded space will also to an extent, although the space between G1 and 2 is largely taken up with the single storey structure for the site-wide energy centre, albeit with a green roof. The slightly informal layout of the villas, which means although they roughly follow the alignment of the primary street, they allow a variable width zone of informal landscaping including trees between the villas and their street frontage, should further embed the pavilions into the expanded SINC. Design officers are delighted with the naturally landscaped setting this will give the villas.

	<p>31. QRP questioned whether the space between Blocks G1 & 2 could be made wider, but this space width was fixed with the parameter plans approved as part of the hybrid, and officers are convinced the applicants have shown the wooded character of the SINC will be successfully drawn through this space, despite its more onerous functional requirements such as providing access to residents' bin and bike stores. They were also concerned at the freestanding bike stores on the wider edges of the gated courtyards, between the mansion blocks (in Plots F and H), having blank facades onto those courtyards, so they have been amended to a mesh. They were also concerned that the private gardens to the townhouses would in practice be rather short and dark, given the increasing density of bushy vegetation towards the southern end of the western boundary of the development, but that would be under residents' control, and they would have the further benefit of sunny 1st floor rear roof terraces. Overall, the QRP praised the ambitious landscaping and reassuring maintenance strategies of the development.</p> <p>32. The primacy, thoughtful detail and exemplary quality of the landscaping proposed as part of this reserved matters application, along with the convincing management plans for it and its integration with the buildings and uses, continue to demonstrate the centrality of high quality amenity space, attractive landscaping, careful and determined nature conservation, huge effort at retention of trees and provision of a biophilic neighbourhood in this proposal.</p>	
Flood & Water Management	<p>Having reviewed the submission, it has not included a "Flood Risk Assessment". As a part of any reserved matter application, the applicant must provide full Flood Risk Assessment and Drainage Strategy confirming the following:</p> <p>1. There will be no increase in runoff from the proposed development. Therefore calculations are required for the pre and post development Greenfield runoff rates, potential impacts of increased impermeable area, and the attenuation volumes required to reduce the runoff from the developed site.</p>	The information submitted partially satisfies the requirements of the condition and can only be discharged in part

	<p>2. Calculations should include a full range of rainfall data for each return period provided by Micro drainage modelling or similar simulating storms through the drainage system, with results of critical storms, demonstrating that there is no surcharging of the system for the 1 in 1 year storm, no flooding of the site for 1 in 30 year storm and that any above ground flooding for 1 in 100 year storm is limited to areas designated and safe to flood, away from sensitive infrastructure or buildings. These storms should also include an allowance for climate change.</p> <p>3. For the calculations above, we request that the applicant utilises more up to date FEH rainfall datasets rather than usage of FSR rainfall method.</p> <p>4. An evidence confirming that the site has an agreed point of discharge.</p> <p>5. Any overland flows as generated by the scheme will need to be directed to follow the path that overland flows currently follow. A diagrammatic indication of these routes on plan demonstrating that these flow paths would not pose a risk to properties and vulnerable development</p> <p>6. Please see below a link for the copy of our SuDS Guidance and requirement for Technical Assessment for preparing the submission along with attached a copy of Haringey's pro-forma, which will need to be completed and return as a part of any submission: Microsoft Word - Haringey SuDS Guide - Requirements for LLFA TA Issued Living Draft 11.03.2016 FINAL.docx</p>	
Placemaking	<p>St Anns Masterplan in the Context of wider Tottenham Regeneration</p> <p>The site sits within a "Placemaking Area" in the emerging Local Plan, and the "Seven Sisters Corridor Area of Change" in the Tottenham Area Action Plan (2017), linking to the West Green Road District Centre to the north and the Green Lanes District Centre to the west.</p>	Noted

A strategic engagement programme titled 'Tottenham Voices' was recently completed to develop priorities for the next ten years in Tottenham and better harness the opportunities from the London Borough of Culture '27, Euro '28, and beyond. Some of the key aspirations from residents included a desire for more opportunities to enjoy leisure and culture, reduced crime/improved perceptions of safety, and provision of safe spaces for young people.

The Regeneration Team support the applicant's proposals for significant numbers of affordable homes and new workspace/commercial uses. Building on the results of the "Tottenham Voices" engagement, the team would like to request further information with respect to the non-residential, night time economy, and play strategies for the site in order to contribute to the area's long term vitality and resilience, and ensure that it is an attractive and functional place to live.

The comments below set out how the Placemaking team encourage the applicant to maximise opportunities for employment, cultural, play, and community functions, where various socio-economic groups can interact and collaborate. This would also increase footfall and passive surveillance, contributing to a perception of safety and reduced crime.

Amenity and Play Space

We support the principle of a landscape led scheme, with opportunities for integrated play where possible. However, as the level of playspace has already been determined for Phase 1A, the proposed quantum of playspace for Phases 1B & 2 does not seem to reflect the child yield on this part of the site.

The DAS and Design Code 3.1.82 note that the scheme is reliant on Chestnuts Park as the focus for older children's play and that the play requirement for 12+ years is stated as 1,100m². Given how intensively Chestnuts Park is already used by all age groups (with St Anns an area of open space deficiency) this suggests that the development should deliver expansion of existing facilities at Chestnuts Park to enable indoor and outdoor 'safe spaces' for age 12+.

The Design Code notes that “*additional opportunities for integrated play within the public realm and public open space should be provided throughout the site*”. We propose that the applicant reviews the possible allocation of roof spaces as safe ‘hang outs’ for ages 12+ and as flexible community infrastructure which could contribute to passive surveillance of the streets below. This is especially important as Hermitage and Gardens only has one very small, shared community facility and the emerging Local Plan shows a need for increased access to shared community facilities in the Ward.

Southwest Square and Link to Warwick Gardens

We strongly support the move to increase permeability through the new link and acknowledge that this would need to be delivered at the same time as Phase 1B to support the levels of parking across the development.

We encourage the applicant to consider the detailed approach to the link as at present it has little passive surveillance and could feel hostile. We would encourage the applicant to consider how the following can be achieved:

1. How the commercial unit G1 on the SW square will be occupied, with long opening hours (could this be part of the affordable provision to attract a good tenant eg. a community cafe)?
2. Suitable levels of lighting, perhaps lighting to the flank wall of the Warwick Gardens flats alongside opportunities for public art, and wayfinding
3. CCTV cameras (reflecting the early secure by design consultation)
4. The design of the parking area to Warwick Gardens and the footway on Stanhope Gardens be considered e.g. with walkway improvements, a dedicated cycle route, boundary treatment and greening, supporting the increased footfall linking to Green Lanes and overground station.

SNCI

Whilst proposals to retain the ecological corridor are strongly supported, we would encourage the applicant to develop the thinking around boundary treatment, lighting, soft planting and management of the space to reduce potential for crime and ASB. A

good example is 'The Railway Fields', located opposite Haringey Green Lanes Station. This is managed by The Conservation Volunteers and is used as an environmental teaching centre for local schools.

The applicant is encouraged to consider how passive surveillance to the SNCI can be increased, as entrances to Plot G are located to the north and low-level or zero lighting is proposed along the SNCI (to safeguard ecology).

Culture, Public Art and Nighttime Economy

The site is close to the vibrant cultural and creative communities of the Gourley Triangle Creative Enterprise Zone and the Haringay Warehouse District. With Haringey recently named the 'Borough of Culture' for 2027, there is a unique opportunity through the masterplan to grow the area's artistic and cultural landscape.

As part of this, we would strongly support that new open spaces (eg. the South West Square) are designed with appropriate infrastructure (eg. power, water and storage) to enable public events, local markets and community festivals to take place.

We encourage the applicant to support the emerging night time economy with maximised opportunities for streetside dining, long open hours, illuminated wayfinding and light art. Where there are opportunities to use rooftop spaces, these could be made available for community hire, to contribute to the night time economy.

There are many opportunities for retained buildings to be developed as meanwhile uses, while the site is under development, to show off the full potential of the development to potential tenants.

Workspace

A workspace/commercial marketing strategy is needed to ensure this becomes part of the dynamic cluster of businesses in the area eg. creative industries in the warehouse district, F&B on Green Lanes & Seven Sisters Market and fashion/maker spaces on the Gourley Triangle.

The applicant is encouraged to provide the infrastructure and space for the site to become a destination for businesses within London, a key growth location, and ideal setting for start ups and small businesses. It will be important to liaise with local business forums (Green Lanes, West Green Road, also LBH's Town Centre Management and Regeneration team alongside key local business influencers and leaders) in building this strategy.

Location & Planning Policy Context

1. The St Ann's Hospital is a large, walled, historic hospital compound in the south-centre of the borough, approximately mid-way between Green Lanes to the west and Seven Sisters to the east. Its long northern boundary is the southern side of St Ann's Road, a major east-west street connecting Green Lanes with South Tottenham, and its long southern boundary is the embankment of the Gospel Oak to Barking railway line, used for the London Overground Suffragette Line and goods services, whilst it's shorter eastern and western boundaries are to residential streets and the backs of terraced houses. In recent years the health service has, in consultation with the council and other stakeholders, been redeveloping parts of the hospital, gradually moving health facilities into just the eastern half of the site.
2. This application is for Reserved Matters Approval for a part of a site previously granted Outline Approval, as part of a Hybrid Planning Permission, [HGY/2022/1833](#). That hybrid permission included full planning permission over part of the site, outline permission over the rest, following a single coordinated Masterplan, and the outline portion included a Design Code, which form part of the approved documents, and should help align and coordinate the outline sections of the site with the detailed design, form, and layout of the detailed portion of the site. The Masterplan is a coherent proposal that should successfully integrate the proposed development into its contrasting surroundings and improve connectivity. It demonstrates that the heights and built forms proposed would build up gradually from the prevailing two storey residential terraces to its west, interspersed as they are with three to five storey flatted blocks, and to the similar height but more campus-like retained hospital estate to the east. A phasing programme is included in the masterplan, indicating the

works proceeding in an anticlockwise direction, from the detailed phase to the south-western corner, then to the south-east, finishing at the north-eastern corner. This is appropriate as it will limit disruption to existing residents and roughly time the later phases alongside later phases of the continuing hospital's works.

3. The Hybrid Approval built upon several prior years of detailed discussions between the hospital owners (the Health Authority), the council, the Greater London Authority, the local community, and prospective developers. The Health Authority first commissioned a masterplan from Broadway Malyan 2012-2015, for the residential development of the western half of the existing hospital site, developed in consultation with council officers and granted planning permission in March 2015 (HGY/2014/1691, now expired). This was used to market the site to potential developers, whilst at the same time a community group developed a rival proposal for the site. This GLA then brokered a deal involving both of these applicants. At the same time and since, the Health Authority have been developing projects and carrying out their construction for the consolidation of the health care services on the retained hospital site, including a design award winning new Blossom Court mental health inpatient wards, amore recent Imaging Centre and a number of smaller projects to adapt and update existing buildings and remove any facilities or plant relied on in what is now to be the residential development site.
4. Council officers, including this Design Officer, have been fully involved in pre-app and other discussions on all the above schemes, and it has been reviewed by Haringey's independent, objective, expert, Quality Review Panel (QRP) four times at hybrid application pre-application and application phase and once at the pre-application phase for this reserved matters application, with the conclusion of those reviewed being positive. For this application, the QRP were wholly and enthusiastically supportive of the proposals they saw, but with a few minor and detailed concerns, all of which have been addressed in amendments and further justification by the applicants, fully to officers' satisfaction.
5. The site is allocated in the council's Local Plan, Site Allocations DPD (adopted July 2017) as SA28: St Ann's Hospital Site, for "Enabling residential development to rationalise and improve the existing hospital site". Site requirements are for the existing boundary wall to be integrated into the development, areas of SINC

in the south of the site should be enhanced, the site developed as residential in order to enable a rationalisation and enhancement of the health facilities, a new connection towards Green Lanes provided at the south west corner, integrated into the cycle and pedestrian network, provision for a north-south route through the site, preserve and enhance the character of the conservation area, its significance, and its setting as per the statutory requirements, and provide new open space on the site which complements the nearby Chestnuts Park. Development guidelines include heights reduced to respect the amenity of neighbouring Warwick Gardens, and potential for being part of a decentralised energy network. Officers consider this proposal, like all those previous proposals mentioned above, to be wholly in accordance with the Site Allocation.

Structure of the Application

6. This is the second phase and the first Reserved Matters Application to be submitted to the Council for planning approval, although it is labelled Phases 1b, 2 & 3, for the applicants own reasons, irrelevant to consideration of the application. There remains a similarly sized portion of the approved development that has not been submitted for Reserved Matters and therefore remains only in Outline Approval, to the east of the site, north-east of *this* application, which may be submitted in future for one or more subsequent reserved matters applications. As this application is for Reserved Matters, several matters are already considered to have been decided in the Hybrid Approval, and several others are only under consideration inasmuch as they are in accordance with the approved masterplan and design code. Matters decided in the hybrid approval or subject to the Masterplan/ Design Code are itemised below.
7. The following issues were decided in the hybrid planning permission and are not changed in this reserved matters application:
 - 7.1. Use; including the range of uses, which specifically for this application is overwhelmingly residential, with just one small business unit (Class E) in the south-western corner. A significant quantum of non-residential uses was included in the detailed portion of the hybrid permission, focussing on the retained buildings.

	<p>7.2. Residential mix; including affordable / market housing, specific types of affordable housing offered, and the range of sizes of units in each, with the quantum and range of affordable housing continuing to be widely praised, including specifically by the QRP.</p> <p>7.3. Height; including the strategy of concentrating height around the edge of the central park (Peace Garden), including blocks H2 & 3 in this phase, and the pavilions along the southern edge of the site, all in this phase. Heights agreed also include tight detailed height ranges as part of the parameter plans, effectively absolutely defining possible heights of this reserved matters to those previously approved.</p> <p>7.4. Block pattern; in strategy and again in tightly defined approved parameter plans.</p> <p>7.5. Access, including site access points from the north and, for pedestrians and cyclists, south-west, and detailed building access strategy in the illustrative scheme and in detailed codes in the design code.</p> <p>8. These further issues are only to be decided in this application as to whether the detailed proposals are in accordance with the approved Masterplan & Design Code:</p> <p>8.1. Detailed Layout, which is covered in the design code, and for both the townhouses (in this Plot E), and mansion blocks (in this, Plots F & H) follow extremely closely virtually identical blocks already designed in the detailed portion of the hybrid permission (plot B for Plot E & Plot C for Plots F & H). Nevertheless, there are details, that are different between them, for which it is relevant to consider whether these reserved matters match up to the masterplan, design code and corresponding detailed designs from the hybrid approval, whilst Plots G and J, "The Pavilions" are in a typology unique to this phase.</p> <p>8.2. Elevational Composition, similarly to detailed layout, with a clear model to follow for the townhouses and mansion blocks, and general principles for the pavilions.</p> <p>8.3. Materials & Detailing, again similarly to detailed layout.</p>	
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8.4. Landscaping, also covered in the design code and masterplan but detailed here for the first time for these elements, whilst considering that the greatest distinctiveness of the whole St Ann's development is to be found in the generous and high quality landscaping, with the buildings generally forming more of a background. Whilst the main central park space for the development, the Peace Garden, is detailed in the hybrid permission, and the designs of most of the streets of this reserved matters application follow those of the streets in the hybrid permission, the expanded woodland along the southern boundary is a major landscape feature only found in this phase, as are the spaces between the pavilions and the green street, which together draw the woodland into the heart of the site, are also unique to this phase.

Design Code

9. The Design Code is an Approved Document, giving it greater weight in considering this and future Reserved Matters applications than the Design & Access Statement. As such it is crucial to ensuring that future phases will be built out to at least as good quality as the initial phases for which detailed planning permission was granted. In general, officers consider the Design Code (DC) is a really high-quality document that promises to be extremely powerful and useful in supporting and protecting high quality design and a coherent design across the development, tying the later phases, only previously applied for in outline, to the earlier phases approved previously in detail.
10. The document is structured with Site Wide Codes, Landscape Codes and Architectural Codes. The general principles within the Site Wide codes are excellent, placing some of the more detailed Conservation Area principles within the Site Wide codes, especially crucial views, giving them a welcome prominence. To avoid them being forgotten in the Architectural and Landscape Codes, there is cross referencing throughout. Codes are described as either **must** or **should** be carried out. Unlike many other Codes, **may** is never used, to give greater certainty, but reasonable flexibility in implementing the outline portion. Officers consider the most crucial elements are definitive.
11. The Design Code is particularly strong on landscaping, both hard and soft, with a long and detailed section on Landscape and Public Realm coding, to reflect and

help to implement the overall intention for the development to be led by the green and natural landscape, and to be designed around the importance placed on preserving key existing trees and areas of landscaping within the site.

Detailed Layout

12. The townhouses (Plot E) have almost identical plan except for open plan living dining kitchen as they are for market sale, whereas Plot B have separate dining kitchen as they are for social rent. They have no differences in external appearance, promoting excellent tenure blind social integration.
13. The mansion blocks (Plots F & H) follow the same “classic city block” pattern of development as the equivalent mansion blocks in the detailed portion of the hybrid permission (Plots C & D), with two blocks wrapping most of the way around a central shared private courtyard garden, open apart from railings and gates at two sides aligned to provide views out and through and support placemaking. However, each plot’s precise layout responds to specific context, with one corner of Plot F, like a different corner of Plot D, opening up to form a pocket square, the “Birch Grove”, facing the retained water tower and around a cluster of retained specimen trees, whilst the north faces of both Plot H, like the east face of Plots D, form taller point blocks facing the Peace Garden and animating a Neighbourhood Square, detailed in the hybrid permission, forming the busy south-western corner of the Peace Garden. Their internal layouts are similar, with central corridors around some single aspect, mostly dual aspect through and corner flats. In response to QRP concerns at some instances of dog-leg corridors, some simplifications of internal layout have been achieved, ground floor flats with their own access off the street have been maximised, and to their concerns about privacy of street facing ground floor bedrooms, defensible street-edge landscaping has been enhanced.
14. The pavilions (or villas) are not a typology designed in detail in the hybrid permission, unlike all others, but are designed in outline in the masterplan and illustrative scheme, and closely defined in the parameter plans and design code, which define their height, bulk, and approach to layout. Nevertheless, their detailed layout, including that of the commercial unit facing the south-western square in Block G1 are detailed in this reserved matters application. Most of the layout decisions are fixed in the outline proposal, including having five flats per

floor, locating the main site-wide energy centre in two of them and in a single storey structure between the two (G1 and 2), and having a retail / commercial unit on the ground floor of G1, essential to provide animation and activity in the South West Square, where the South Western Entrance (included in the detailed part of the hybrid permission) enters the site from Stanhope Gardens.

15. In response to concerns from officers and the QRP that the initial reserved matters proposals for this unit did not sufficiently provide this animation, the amount of glazing to this unit has been increased, its' main customer entrance has been placed on a faceted corner so it will address both the Primary Street (to its north) and the square, and the reconstituted stone / concrete facia / sign zone has been extended, whilst the landscaping proposed for the square has been modified to ensure, especially if, as is hoped, the unit has outdoor seating in the square, pedestrian movement desire lines do not cross planting. This should provide some considerable reassurance that the unit can provide good animation to the pedestrian and cyclists' entrance, and attract footfall to the square, provided an operator can be attracted to the unit very early on, preferably as soon as the unit is completed. The QRP noted it would be strongly advisable for the landlord (Peabody) to secure a tenant even at a loss at first, although this will await their commercial strategy, which is promised "in due course".
16. Overall, residential and commercial detailed layouts in this reserved matters application promise to match the high quality detailed layouts in the hybrid permission, with a convincing commercial unit capable of animating the south-western square, provided it is let early to the right sort of business, and high quality new homes, indistinguishable between market and affordable (in several different tenures). As is to be routinely expected, all room and flat sizes meet or exceed statutory minima and are provided with plentiful private external amenity space. Day and sunlight levels, privacy from overlooking and being overlooked along with interesting outlook are all thought about carefully and achieve good results.

Elevational Composition

17. The townhouses are designed to appear as identical to those in the hybrid permission (Plot B). The house on the southern end of the row contains more additional side windows than those of the northern end and the ends of the rows

in the hybrid permission, in recognition of its additional need to provide passive surveillance to the south-western square.

18. As noted above, the mansion blocks of Plots F and H follow closely the designs of those of Plots C & D approved in detail in the hybrid permission that included an illustrative scheme, parameter plans and design codes further requiring matching designs, including their elevational composition. The only differences are where their detailed locations suggest elaboration. The gable ends of Blocks F1 and F2 onto the Birch Grove feature contrasting brick and reconstituted stone cornices, whilst the northern end of Block H2, facing the Neighbourhood Square that forms the south-western corner of the Peace Garden, and with the retained former Admin Building in front but offset to its right, is significantly elaborated with an offset main entrance central to the part of its elevation visible, and with the most ornamental facade composition within the rules of the design code, appropriate to its pivotal position.
19. That Pavilions are a unique and different typology to any detailed in the hybrid permission, but in accordance with the masterplan, parameter plans and design codes then approved for them, retain the consistent, composed, brick-based architecture of the wider development. But the pavilions are distinguished from the street-lining mansion blocks of the majority of the St Ann's site, in recognition of their urban morphology being object-type buildings set within natural or fairly natural surrounding landscape. This also responds to QRP concerns that the pavilions be more distinctive.
20. To achieve this distinctiveness within the consistent language across the new neighbourhood, brick detailing to the pavilions has been substantially further elaborated, including with rustication, contrasting bricks, elaborated, grouped and recessed windows, and fully projecting balconies, as described below under detailing. The enclosure of the rooftop plant to Block G2 has been designed to be reminiscent of the retained water tower, which is a contextually appropriate, honest expression of the character and use of that block, containing the site-wide energy centre. Southern elevations do not appear as backs, but just as elaborated as northern elevations, so that when viewed from the paths through the woodland and more significantly from the railway they will not appear as though they are the back of the development.

21. Overall, the elevational composition of the buildings of this reserved matters application do not mark a dramatic change from those approved in the previous hybrid permission, with even the more unique and object-like Pavilions being clearly and recognisably of the same language of composition. Design officers consider the consistency of the architectural approach to be a strong virtue of the scheme overall, emphasising the primacy of the retained existing buildings and range of landscaped spaces, to which the new predominantly residential buildings will provide a frame, setting and background, whilst providing elegant, attractive, and distinctive homes.

Materials & Detailing

22. Intrinsically connected to the elevational composition points above, the various plots of this reserved matters application have the same considerations and relations to the approved hybrid permission, its detailed design portions, masterplan, illustrative scheme, and design code. Much more than that though, it has been made clear throughout, and is defined in those hybrid permission approved documents, that the materials and detailing of all phases of the St Ann's development are defined in that hybrid permission, or subject to conditions of that planning permission.

23. In particular, current application HGY/2024/0148 seeks discharge of Condition 56 (i) (External Facing Materials – Bricks Only) attached to Planning Permission Ref: HGY/2022/1833, the hybrid permission. This Design Officer has attended site to inspect brick sample panels, displayed in conjunction with colour swatches for joinery and metalwork proposed, for all buildings within the development, and indicated that they are considered acceptable; durable, attractive in appearance and in accordance with the proposed development. They also looked good and appropriate in context with the samples / colour swatches relevant for the joinery & metalwork throughout the development. There will also be a series of concrete / reconstituted stone for which samples will need to be approved, but it would therefore be appropriate for the same materials to be used in this and the remaining stages as those already chosen and approved for the first phase (i.e. for the detailed portion of the hybrid permission).

24. For building details, for the townhouses and mansion blocks, much of the same conditions will apply, that the key will be that the same or virtually

indistinguishable details are used in this & subsequent phases as are used in the 1st phase detailed in the hybrid permission, in order to maintain consistency across the development. Nevertheless, this phase contains the pavilions, which are a unique typology in the wider development, giving rise to a few specific concerns with respect to their detailing, due to their woodland edge location at the southern edge of the site, overlooking the railway and acting as objects in space rather than street lining blocks.

25. The QRP suggested that the pavilions should be more distinctive and different in architectural expression and materials, reflecting their naturally landscaped setting, perhaps using other materials than brick. They also noted concerns that the pavilions' southern location, open aspect and that one of their 5 flats per floor is single aspect south facing, made them vulnerable to overheating, especially given the railway just to their south might make open windows noisy. The applicants' architects have strenuously defended their preference for the pavilions still being predominantly in brick, to protect the overall consistency of this new neighbourhood, in view of the proven durability and attractiveness of that material, and its compatibility with the retained heritage buildings and wider brick dominated surrounding character. However, they have further modified the brick detailing to create greater contrast between the pavilions and the mansion blocks. Contrasting brick entrances and footings, rather than full storeys of dark brick on the mansion blocks, light contrasting brick banding to the proposed buff brick (central) villas, referencing the Peabody heritage, that detail being common to the many Peabody estates across London, a rusticated ground floor to the red brick villas (G1, J2 & 3), dramatic triple window details to the top floors, with recessed panels between, and brick reveals to the top floors rather than concrete to the mansion blocks, all should give the pavilions a distinctive contrasting character.
26. Balconies to the south facades to the pavilion have also been made fully projecting, giving better shading to rooms below them, in response to the QRP and officer's overheating concern, giving residents greater engagement with their landscaped setting and the buildings reflecting their object-in landscape rather than streetscape character, whilst these projecting balconies combined with the elaboration to the top floors should ensure they are not, as the QRP were concerned, read as the back of the development, but as another frontage. A

comprehensive series of ventilation measures to accommodate the unavoidable presence of a few single aspect south facing flats in these blocks include making all their windows openable, use of lower G-values of 0.42 to their glazing (reducing sunlight overheating), MVHR with cooling bolt-on and a detailed overheating assessment proving this will not be a problem; but for details of this please refer to the Sustainability Officers' comments.

27. Design Officers are satisfied that the pavilions' materials and detailing will be distinctive and attractive, appropriate to their landscaped setting and objects-in-landscape character, whilst remaining consistent with the character and high quality of the rest of the development.

Landscaping

28. Aspects of the proposed landscaping, particularly the Primary Street around the development and the Gated Courtyards at the heart of the urban blocks (plots F & H), follow the designs previously approved in the hybrid permission, but the majority of their landscape elements of this phase are unique. These comprise the "Birch Grove" pocket park, the "Green Link" wooded swale street, the smaller pocket parks between the pavilions and the wooded SINC (Site of Importance for Nature Conservation). Landscape designs for the Primary Street and Gated Courtyards within this reserved matters application are also functional and unremarkable, whereas it is the range of unique spaces, particularly the Peace Garden (approved in the hybrid), the SINC (in this), the four or five smaller public squares (one of which is in this, or two if the South-West Square is counted as separate from the SINC), and the Green Link (also in this).

29. The existing woodlands along the southern edge of the site, against the shallow embankment of the Gospel Oak to Barking railway line (London Overground Suffragette Line) is designated as a Site of Importance for Nature Conservation (SINC, of Local significance). The railway tracks and both embankments themselves are also designated as SINC (Grade II, a higher designation), as well as an Ecological Corridor, recognising its value to biodiversity both as habitat and movement corridor. It is planned, under the approved masterplan, parameter plans and design code, to be expanded northwards further into the site. It will be managed by a wildlife trust, and a light fence that will not be particularly visually intrusive but will provide clear psychological and gently persuasive separation

from generally accessible public realm, including the South-West Path, to officers and QRP satisfaction, which should balance well conservation needs with its role providing amenity to residents.

30. The spaces between the pavilions further extend the natural, wooded landscaping and biodiversity opportunity into the site, then connecting via the wooded swale of the Green Street into the central Peace Garden, setting up a new ecological corridor connected to the existing one. The “Forest Garden” between Blocks G2 and J1 will be particularly effective at this, but the “Villa Court” between J1 and 2, a predominantly wooded space will also to an extent, although the space between G1 and 2 is largely taken up with the single storey structure for the site-wide energy centre, albeit with a green roof. The slightly informal layout of the villas, which means although they roughly follow the alignment of the primary street, they allow a variable width zone of informal landscaping including trees between the villas and their street frontage, should further embed the pavilions into the expanded SINC. Design officers are delighted with the naturally landscaped setting this will give the villas.
31. QRP questioned whether the space between Blocks G1 & 2 could be made wider, but this space width was fixed with the parameter plans approved as part of the hybrid, and officers are convinced the applicants have shown the wooded character of the SINC will be successfully drawn through this space, despite its more onerous functional requirements such as providing access to residents’ bin and bike stores. They were also concerned at the freestanding bike stores on the wider edges of the gated courtyards, between the mansion blocks (in Plots F and H), having blank facades onto those courtyards, so they have been amended to a mesh. They were also concerned that the private gardens to the townhouses would in practice be rather short and dark, given the increasing density of bushy vegetation towards the southern end of the western boundary of the development, but that would be under residents’ control, and they would have the further benefit of sunny 1st floor rear roof terraces. Overall, the QRP praised the ambitious landscaping and reassuring maintenance strategies of the development.
32. The primacy, thoughtful detail and exemplary quality of the landscaping proposed as part of this reserved matters application, along with the convincing management plans for it and its integration with the buildings and uses, continue

	to demonstrate the centrality of high quality amenity space, attractive landscaping, careful and determined nature conservation, huge effort at retention of trees and provision of a biophilic neighbourhood in this proposal.	
Pollution	Having considered the applicant submitted information relevant to this service including; Planning Statement prepared by Lambert Smith Hampton Ltd, dated 1 st December 2023; Reserved Matter Compliance Statement, prepared by Lambert Smith Hampton Ltd, dated December 2023; Design and Access Statement with reference N15302-KCA-XX-XX-RP-A-00002, prepared by Karakusevic Carson Architects, dated 27 th November 2023; Environmental Impact Assessment (EIA) Compliance with reference 333100157/E1/EH prepared by Stantec UK Limited, dated November 2023 and taken note that the above application is in accordance with the outline parameters assessed in the submitted ES, please be advised that the we have no objection to the proposed development in relation to AQ and Land Contamination regarding the information submitted to satisfy conditions 63 (Reserved Matters Compliance Statement) , 65 (Drawing References), 66 (Cycle Provision), 67 (Accessible Housing), 68 (Fire Statement), 69 (Ecological Impact Assessment), 70 (Circular Economy Statement), 71 (Surface Water Drainage Scheme), 72 (Boundary Walls) and 73 (Climate Change Adaptation).	Noted
Transport	<u>Cycle Parking</u> The application includes a plan for cycle parking provision, in support of RMA 1 for Phases 1b and 2 (22398-MA-CP01C - Cycle Parking App), as required under Condition 66 of the Hybrid planning permission (HGY/2022/1833). Condition 66 states that: “Each reserved matters application shall include details of long and short stay cycle parking provision, for both residential and non-residential elements of the development, in line with the London Plan (2021) standards and the London Cycle Design Standards (except aisle width requirements which may be deviated from with reasonable justification).	Noted

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

Within the aforementioned document, it is stated that:

Cycle parking will be provided in accordance with the London Cycle Design Standards through

the provision of:

- *5% of spaces to accommodate larger cycles - large enough to accommodate cargo bikes.*
- *20% of Sheffield Stands (with no tier above).*
- *1m between Sheffield Stands.*
- *No more than 2 sets of doors.*
- *2.5m aisle widths (in agreement with LBH & TfL at the Hybrid Application Stage (HGY/2022/1833)).*
- *Josta (gas assisted) two tier for remaining stands (See Figure 4.1), with:*
 - o *400mm spacing between racks.*
 - o *2.6m floor to ceiling height.*

The principle of these elements and the overall approach were discussed and agreed as part of the consent for HGY/2022/1833.

Residential:

Long Stay:

Cycle parking for each of the houses (Plot E) is proposed be located externally, in stores at the rear of the properties. However, little detail has been submitted regarding these, such as accessibility of the stores or relevant dimensions. These details will be required to fully satisfy the discharge of Condition 66 attached to the consented HGY/2022/1833.

Cycle parking for each dwelling within the apartment blocks (Plots F-J) is, for the most part, proposed to be located within their respective block, with supplementary courtyard stores to accommodate the remainder of the storage. Overall accessibility for the proportion of larger cycles appears to be in accordance with the previously agreed principles.

Short Stay:

Short-stay cycle parking is proposed to be apportioned across this relevant phase area, in the form of externally located Sheffield stands. Although some of the stands are proposed to be located outside of the site boundary of the Phase 1B & 2 RMA application, the principle of their proposed positioning on footways and other spaces is acceptable.

The quantum and design of the proposed cycle parking is acceptable. However, further details – such as dimensioned plans – will be required to fully satisfy the discharge of Condition 66, attached to the consented HGY/2022/1833.

Commercial:

Cycle parking is planned for the proposed commercial space of the development; it is proposed that this space will be within Use Class E, F1/F2, with a GIA of 99.3sqm.

Therefore, a worst-case scenario would require the following cycle parking:

- Long Stay
 - E
 - 1 space per 175sqm (A2-5)
 - 1 space per 150sqm (B1)
 - 1 space per 8 FTE staff (D1)
 - F1/F2
 - 1 space per 4 FTE staff (D1)
 - 1 space per 8 FTE staff (D2)
- Short Stay
 - E
 - 1 space per 40sqm (A2-A5)
 - 1 space per 500sqm (B1)
 - F1/F2
 - 1 space per 100sqm GEA (D2)

The proposed quantum of commercial / non-residential cycle parking is 1 x long stay space and 3 x short stay spaces.

Overall, the quantum of proposed cycle parking is acceptable. It is stated that the long-stay cycle parking will be located within its relevant block (Block G), separate from the residential provision; the short-stay cycle parking is proposed to be located externally

within the public realm, but is not designated to the specific commercial unit itself. Rather, it is proposed that up to 8 x stands (providing space for up to 16 x cycles), located in close proximity to the non-residential block (Block G) can accommodate short-stay requirements for both residential and non-residential. It would be preferable for both uses to be more clearly designated. However, given the over-provision of overall spaces, this proposal would be acceptable.

Car Parking

The principle of these elements and the overall approach were discussed and agreed as part of the consent for HGY/2022/1833.

A Car Parking Management Plan (**22398-MA-CPMP01G - Car Park Mgmt Plan.pdf**) has been submitted in support of this application and, in part, to fulfil the obligations under Condition 77 of the consented HGY/2022/1833.

Condition 77:

Prior to first occupation of the relevant phase a Car Park Management Plan shall be submitted to the local planning authority for its written approval, including details of the allocation and management of the on-site car parking spaces including all accessible car parking spaces (which shall be leased and not sold, in line with the requirements of the London Plan). Once approved the CPMP shall be implemented and followed thereafter,

unless otherwise agreed in writing in advance by the local planning authority.

Reason: To ensure those with a requirement for car parking are prioritised.

Some of the relevant key points from this RMA application are:

- 'Car-lite' development – residents will not be able to apply for permit within CPZ (current or future).
- 59 x car parking spaces (within Phases 1b and 2).
- 3% disabled parking provided up front. Additional 2% provision, based on future demand (not 7% additional, as per London Plan).
- EVCP included – 20% active of total provision, 80% of remaining provision.

The provision for car parking is proposed to be on-street within the development site, rather than located within any buildings. A minimum width of 2m is allowed for, with lengths of 6m (6.6m for accessible bays). Parking bays are delineated through the use of a different material to that of the internal road network and are all proposed to be constructed from permeable material. Accessible bays are planned to be located within 50m of their respective residential block. The proposed car parking spaces are all acceptable in terms of their measurements and location throughout the site.

The quantum of parking spaces, within the phases included within the RMA, equates to a ratio of 0.13 (the total parking ratio, as stated in the hybrid application – HGY/2022/1833 – was 0.17).

Provision for accessible bays is proposed to be 3% of total parking spaces, with an additional 2% proposed based on future demand. This is lower than the London Plan recommended 7%. The London Plan states that:

“as a minimum as part of the Parking Design and Management Plan, how an additional seven per cent of dwellings could be provided with one designated disabled persons parking space per dwelling in future upon request as soon as existing provision is insufficient. This should be secured at the planning stage”.

However, the proposed principle has been accepted as part of the hybrid consent (HGY/2022/1833). Nevertheless, with details of the final phase of the development to come forward, it would be important to recognise that increased provision of accessible bays may be required and should be considered.

Electrical Vehicle Charging Points are proposed to be provided for all spaces, with a total of 12 x active and 47 x passive EVCPs; this meets the required 20% active / 80% passive ratio, as per London Plan policy T6.1(C). Confirmation of the specification of EVCPs should be included as a separate planning condition.

The proposed overall strategy for car parking management includes:

- No freehold sale of parking spaces

- No allocation of specific spaces
- Enforcement by private contractor
- Various enforcement measures in the event of unauthorised parking

It is proposed, as stated within the Car Parking Management Plan (**22398-MA-CPMP01G - Car Park Mgnt Plan.pdf**), to allocate the spaces designated for the affordable dwellings, based on the following prioritised basis:

- First priority will be given to units with 3 bedrooms or more where a resident has a specific need for a vehicle to undertake their job;
- Second priority will be given to units with 3 bedrooms or more;
- Third priority will be given to units with 2 bedrooms or fewer where a resident has a specific need for a vehicle to undertake their job; and
- Fourth priority will be given to units with 2 bedrooms or fewer.

The principle of this is supported.

It is proposed, as stated within the Car Parking Management Plan (**22398-MA-CPMP01G - Car Park Mgnt Plan.pdf**), to allocate the spaces designated for the private dwellings, based on the following prioritised basis:

- Blue badge holders (in the first instance);
- Then on a first come, first served basis.

All car parking spaces must be allocated in line with the planning comments, attached to HGY/2022/1833:

1. Wheelchair accessible car parking 10%
2. Family sized units- 4 and 3 bed units
3. 2 bed 4 and 3 person units

Furthermore, it must be stated that all car parking spaces must be leased, not sold, in line with the London Plan.

For the commercial element, 1 disabled space for non-residential use (Plot G) has been proposed. This meets the requirement, as per London Plan policy T6.5.

The overall strategy for management of the car parking spaces must be clarified within the Car Parking Management Plan.

Travel Plan

A Residential Travel Plan has been submitted in support of the application, to satisfy the requirements of the S106 Agreement, Annex 1, Part 7 (Travel Plans) from HGY/2022/1833. This Travel Plan covers Phases 1b and 2 – the phases under consideration as part of the RMA - (as confirmed at point 1.6.2 - **22398-MA-TP01C-St Anns Travel Plan.pdf**); it is in the form of a Framework Travel Plan.

The Travel Plan demonstrates sufficient appreciation of the current transport context – both in terms of public transport accessibility and the local highway network, in addition to relevant local amenities. Further, the Travel Plan makes clear reference to the phased development of the site, and how that will impact accessing the site (4.4.1). The SW link (the connection to Stanhope Gardens / Warwick Gardens) is confirmed as being provided within the phases as part of this RMA, which is vital to improving the PTAL of the site and providing new access to / from the site by foot or cycle, central to the sustainable transport strategy of the report.

The Travel Plan is a live document, so will need to be updated as required. At this stage, the Framework Travel Plan is acceptable.

An equivalent Travel Plan for the proposed Non-Residential / Commercial elements has not been submitted as part of this RMA. Taking into account the cumulative quantum of non-residential floor space of some 3,905sqm, we will require the applicant to submit a framework travel plan for the commercial aspect of the development proposal which is to be monitored for a period of not less than 5 years. Given that the GIA for the Commercial development within this RMA is such a small amount of the overall Non-Residential / Commercial element of the site, it has been agreed that a combined Travel Plan would be submitted for all of these; therefore, this would need to be provided as part of the RMA for the final phase of the development, or when the bulk of the Non-Residential / Commercial elements are to be developed.

	<p><u>Delivery and Servicing</u></p> <p>A Delivery and Servicing Plan has been submitted in support of the application (22398-MA-DSP01D - St Anns DSP App.pdf) to support this RMA application; an outline DSP was submitted as part of the hybrid planning application.</p> <p>The proposals for non-residential servicing include a delivery / service bay, located directly outside of the relevant block (G) within the site. Trip generation data is the same as provided as part of the hybrid planning application (HGY/2022/1833), and is deemed to be acceptable.</p> <p>The proposals for residential servicing include plans for refuse collection and deliveries. Refuse collection can take place in close proximity to each relevant block. Trip generation is deemed to be at acceptable levels, considering the road network.</p> <p>Vehicle tracking indicates that there is sufficient space for refuse vehicles to access the site sufficient.</p> <p>As the plan is a live document, it will need to be updated as required (particularly after occupation of the commercial unit). At this stage, the DSP is acceptable.</p>	
Nature Conservation	<p>HGY-2022-1833 - Condition 69 – Ecological Impact Assessment</p> <p>To meet the requirements of Condition 69 (Ecological Impact Assessment), the applicant has appointed Middlemarch Environmental Ltd to provide the necessary</p>	Noted, compliance has been confirmed by the applicant.

documentation. They have provided a Construction Ecological Management Plan (CEcMP), a Landscape and Ecology Management Plan (LEMP) and an Ecological Mitigation Strategy (EMP), which have all been reviewed.

Construction Ecological Management Plan (CEcMP)

The CEcMP has been drafted in accordance with British Standard 42020:2013 “Biodiversity, Code of Practice for Planning and Development”

An Ecological Management Team will be appointed to ensure construction works proceed in accordance with the CEcMP with agreed responsibilities.

The Ecological Manager will be responsible for developing method statements and site protocols as required, providing guidance for the site team in dealing with environmental matters, and liaising with contractors/sub-contractors and any statutory or third party with an ecological interest in the scheme.

The Ecological Manager will ensure that all site personnel are appropriately briefed on the ecological issues as part of the site induction process. An Ecological Clerk of Works will be appointed by the client and/or the contractor to advise and oversee construction activities where appropriate and ensure the site team and sub-contractors comply with site protocols and control/mitigation measures.

The Ecological Clerk of Works will be responsible to the Ecological Manager and will approve all method statements and ensure that all relevant site ecological protocols are adhered to.

A series of Biodiversity Protection Zones will be identified to categorise the site according to ecological risk and to identify areas where certain construction activities are prohibited or restricted. It is proposed that a traffic light system will be implemented. The site has been divided into Red, Amber and Green Zones, with Red Zones being those areas of highest biodiversity interest and of greatest risk from construction.

The areas of the site falling into each of the Biodiversity Protection Zones are set out in the CEcMP. Red Zones are the areas that will be retained and protected throughout the development, and works will be subject to ongoing monitoring by the Ecological Clerk of the Works. No works can be undertaken within the Red Zones without prior consent from the Ecological Manager

To ensure adherence to the protective and mitigation measures, all personnel on site will receive a site induction prior to commencing any work activities. The site induction will highlight key issues, operations, times of year and areas in relation to ecology.

The Ecological Clerk of Works will monitor the works which will involve the issuing of ecological certificates, rectification notices and the completion of daily record sheets.

The Ecological Manager will produce a monthly report based on the record sheets, highlighting any issues raised during the programme.

Landscape and Ecology Management Plan (LEMP)

This plan details the management aims and objectives for the site and prescribes detailed yearly actions to be taken by the site's managers to deliver gains for biodiversity as set out in the Ecological Mitigation Strategy.

The LEMP will provide information regarding the long-term management of the site for a period of no less than 30 years. It is a live document will be subject to ongoing monitoring and review.

All management actions must be monitored against management prescriptions or conservation objectives to demonstrate that the aims of the LEMP are being fulfilled.

It is proposed that a Field Monitoring Report will be compiled in Years 1, 3, 5 and every five years thereafter. The reports will be informed by the Management Audits and Field Surveillance Visits to establish if the target habitat type, extent and condition have been fulfilled within the timeframes set out in the LEMP.

A review of the LEMP must be undertaken in Years 1, 3, 5 and every five years thereafter to ensure that the target habitat or condition thresholds are being achieved.

Field Monitoring Reports must be submitted to the Local Planning Authority for approval along with any proposed amendments to the management plan.

Ecological Mitigation Strategy (EMP)

The EMP has been drafted in accordance with British Standard 42020:2013 "Biodiversity, Code of Practice for Planning and Development"

This document sets out avoidance, mitigation, compensation and enhancement proposals that will be implemented to ensure that the favourable conservation status of key ecological features will be maintained at the site prior to the start of construction works, during them and after the completion of the development.

The proposed development will result in the loss of some habitats, although the most valuable habitat (St Ann's Hospital Wood SINC) will be retained and enhanced. However, new habitats will be created including, green roofs, bioswales/raingardens, species-rich grassland as well as extensive tree, shrub and hedge planting.

The landscape strategy has been designed to ensure the long-term retention of existing key habitats and to create linking wildlife corridors through and around the site, allowing species movement into the wider landscape.

The EMS has identified mitigation proposals to ensure the long-term protection of protected and notable species or species groups which have either been recorded at or

	<p>near to the site, or for which suitable habitats are present within the site. These species and species groups are: bats, birds, reptiles, terrestrial mammals and stag beetle.</p> <p>The ecological mitigation must be overseen by a suitably qualified Ecological Clerk of Works who will provide advice to construction and landscaping contractors and manage the interaction between mitigation requirements for each species throughout the development process.</p> <p>Provided that the measures outlined in the CEcMP (Report RT-MME-159856-02) are implemented, most of the predicted or potential ecological effects during construction can either be avoided entirely or reduced to negligible significance.</p> <p>Upon implementation of the LEMP and a carefully designed lighting strategy, it is predicted that the RMA1 development has the potential to result in minor beneficial effect on site biodiversity in the medium to long term</p> <p>A pre-commencement site meeting must take place with the Ecological Manager, the Ecological Clerk of Works, the site manager and Haringey's Nature Conservation Officer, to confirm all the protective measures to be implemented and the monitoring processes.</p>	
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External	Comment	Response
Environment Agency	<p>We have no objection to this application.</p> <p>We previously commented on the original hybrid planning application on the 26 September 2022 (our ref: NE/2022/134751/01, your ref: HGY/2022/1833). In our response letter we recommended several planning conditions to help protect groundwater. We have assessed the details submitted as part of this reserved matters application and we do not believe that there is any increase in risk to groundwater therefore we have no further comments to add. All conditions requested in our response dated 26 September 2022 should be retained and we look forward to being consulted when the applicant is ready to discharge them. Final comments In accordance with the planning practice guidance (determining a planning application, paragraph 019), please notify us by email within two weeks of a decision being made or End 2 application withdrawn. Please provide us with a URL of the decision notice, or an electronic copy of the decision notice or outcome.</p>	Noted

<p>Health and Safety Executive</p>	<p>Scope of consultation</p> <p>1.1. It is noted the above proposal application relates to the application for approval of reserved matters seeking approval of appearance, landscaping, layout and scale in respect of Phases 1b and 2 of the site pursuant to Condition 61 of Planning Permission Reference HGY/2022/1833. 1.2. The 'Fire Strategy Report (RIBA Stage 03 – dated 01/12/2023)' document describes the St Anns New Neighbourhood as comprising residential development split into several phases. • Phase 1b consists of 194 units across the Blocks E, F and G. • Phase 2 consists of 270 units across the Blocks H and J. • Block E will be townhouses</p> <p>1.3. The following blocks will have a height of the topmost storey of 11m and 18m and 18m in height to be afforded a second stair for robustness. In due consideration of the following factors, it is considered that a secondary stair is not necessary to achieve an appropriate level of robustness in design: • The building is to be afforded with mechanically assisted ventilation to be demonstrated as limiting the potential ingress of smoke into the stair and lift core under firefighting activities...”</p> <p>1.4. Blocks G2, H2-H4 and J1-J3 are relevant buildings and have been assessed accordingly; the remaining buildings are within the curtilage of a relevant building and have been considered as part of this assessment.</p> <p>1.5. It is noted that each of these blocks (Blocks G2, H2-4, J1-3) contains a single stair representing the escape stair as well as the firefighting access route to the upper floors.</p> <p>1.6. The fire statement dated 01/12/2023 states that the adopted fire safety design standards are BS 9991 and BS 9999. Previous consultation</p> <p>1.7. HSE received a consultation request on 19/08/2022 for the aforementioned development (HGY/2022/1833) and responded on 19/08/2022, under the HSE reference pgo-1620, with the headline: 'Content'. Planning history</p> <p>1.8. The Decision Notice for planning application HGY/2022/1833 states permission was granted on 10/07/2023. Current consultation</p> <p>1.9. HSE received a further consultation request regarding this development on 12/01/2024. The email from the LPA informed HSE that details from the applicant are available on the planning register, referred from this point onwards as “the applicant’s letter”. For the avoidance of doubt, this substantive response is in relation to the applicant’s letter.</p> <p>1.10. It was noted that 279 files were available on the planning register (HGY/2022/1833). The description of a number of these files was a series of numbers and letters and</p>	<p>Noted</p>
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therefore, the way the files were named on the planning register did not assist HSE to find relevant information.

1.11.The Decision Notice (HGY/2022/1833), relating to Condition 61, states: Reserved Matters Submission (Outline) No Phase within the Development hereby approved in the Outline Component shall be commenced unless and until details of the following: a) appearance b) landscaping c) layout; and d) scale (hereinafter referred to as the "reserved matters") in relation to that part of the Development have been submitted to and approved in writing by the Local Planning Authority. The "Outline Component" can be defined as "the Phases of the development to be shown on the construction phasing plan approved pursuant to Condition 3 in respect of which this decision notice grants outline planning permissions subject to the approval of the reserved matters detailed in Condition 61. Reason: In order to comply with the Town and Country Planning (Development Management Procedure) (England) Order 2015 (as amended) which requires the submission to and approval by, the Local Planning Authority of reserved matters.

1.12.It is noted that this application states: "Details are provided to partially satisfy Conditions 63, 65, 66, 67, 68, 69, 70, 71, 72 and 73 for Phases 1b and 2 of the site of Outline Planning Permission Reference HGY/2022/1833."

1.13.It is also noted that Condition 68, as stated in the Decision Notice for HGY/2022/1833, states: "Fire Statement (Outline) Each reserved matter(s) application for layout, scale and appearance shall be accompanied by a detailed fire statement (in order to meet Gateway One or equivalent). The development shall thereafter proceed in accordance with recommendations and mitigation measures recommended in the statement. Reason: To ensure that the development incorporates the necessary fire safety measures in accordance with the Mayor's London Plan Policy D12."

1.14.For the avoidance of doubt, HSE has assessed this application against the cited (extant) fire standards and guidance, not London Plan Policy D12. 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. However, HSE has identified some matters as supplementary information, set out below, that the applicant should try to address, in advance of later regulatory stages.

2. Supplementary information The following information does not contribute to HSE's substantive response and should not be used for the purposes of decision making by the local planning authority. Smoke ventilation system

2.1. Paragraph A7.2 of the Fire Strategy Report states: “Blocks G2, H2-4, J1-3 are assessed as being between 18m and 30m in uppermost storey height and afforded a single stair core for means of egress and fire service access. Whilst this does align with the guidance of Approved Document B1, it is noted that the NFCC position statement would advise for buildings of >18m in height to be afforded a second stair for robustness. In due consideration of the following factors, it is considered that a secondary stair is not necessary to achieve an appropriate level of robustness in design: • The building is to be afforded with mechanically assisted ventilation to be demonstrated as limiting the potential ingress of smoke into the stair and lift core under firefighting activities...

2.2. Additionally, B2.4.1 states: “The common corridors in all blocks (except Block E) are to be fitted with a mechanical smoke ventilation system in accordance with Clause 14.2.4 BS 9991.” 2.3. The above is noted. HSE can only provide advice to the LPA based on extant fire safety standards and is therefore unable to comment on future recommendations, which are likely to be subject to change. HSE has therefore assessed the residential application based on the extant version of BS9991:2015. However, it will be for the applicant to demonstrate compliance at later regulatory stages. Fire service access and facilities

2.4. Regarding fire service access and facilities, section B.6 of the Fire Strategy Report states: • “Block E (3-storey townhouses): All parts of the building can be reached from the roadway by a 45m hose. The aggregate floor area of all floors is less than 2,000m². • Block F-J: The buildings are provided with rising mains, as such roadway access to within 18m of all mains inlet is to be provided. • Commercial Unit Block G1: every point of the commercial unit on Ground Floor of Block G1 can be accessed within 45m. • at least 1 firefighting shaft is to be provided for: Block G2, Block H2-4, Block J1- 3.”

2.5. This is noted and appears acceptable. However, it will be for the applicant to demonstrate compliance at later regulatory stages. Hydrants

2.6. The response to the question about the reliance on the use of existing hydrants and whether they are currently usable / operable (fire statement, section 13) is given as “don’t know”. Whilst the response “don’t know” is a valid response on the form, it is not appropriate to this development, which relies on working fire hydrants to feed the proposed fire main. In circumstances such as this, best practice is to check the state of the existing hydrants with the water authority. Without knowing their operability, the proposal might be relying on a disused water main or faulty hydrant.

	<p>2.7. It will be for the applicant to demonstrate compliance at later regulatory stages. It should be considered that should additional hydrant installations be required, this may affect land use planning considerations such as the landscaping around the development.</p>	
<p>Historic England</p>	<p><u>Recommend No Archaeological Requirement</u></p> <p>Thank you for your consultation received on 2024-01-12.</p> <p>The Greater London Archaeological Advisory Service (GLAAS) gives advice on archaeology and planning. Our advice follows the National Planning Policy Framework (NPPF) and the GLAAS Charter.</p> <p>NPPF section 16 and the London Plan (2021 Policy HC1) make the conservation of archaeological interest a material planning consideration.</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>An archaeological evaluation was completed last October revealing a limited amount of evidence for foundations of post-medieval farm buildings. These remains are not considered of more than local significance.</p> <p>No further assessment or conditions are therefore necessary.</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>Noted</p>
<p>Natural England</p>	<p><u>Natural England has no comments to make on this reserved matters application.</u></p> <p><u>Natural England has not assessed this application for impacts on protected species. Natural England has published Standing Advice which you can use to assess impacts on protected species or you may wish to consult your own ecology services for advice.</u></p>	<p>Noted</p>

	<p><u>Natural England and the Forestry Commission have also published standing advice on ancient woodland, ancient and veteran trees which you can use to assess any impacts on ancient woodland or trees.</u></p> <p><u>The lack of comment from Natural England does not imply that there are no impacts on the natural environment, but only that the application is not likely to result in significant impacts on statutory designated nature conservation sites or landscapes. It is for the local planning authority to determine whether or not this application is consistent with national and local policies on the natural environment. Other bodies and individuals may be able to provide information and advice on the environmental value of this site and the impacts of the proposal to assist the decision making process. We advise local planning authorities to obtain specialist ecological or other environmental advice when determining the environmental impacts of development.</u></p>	
<p>Metropolitan Police (Designing Out Crime)</p>	<p>Response 30/05/2024</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>Noted</p>

We are in regular contact with project Architects and the Design manager who have engaged with us on regular basis to discuss Crime Prevention and Secured by Design through stages of the development. Concerns around the design and layout of the development have been taken into account by the developer and they take the opportunity to engage with our department as and when the need arises. They have not made mention specifically to crime prevention or designing out crime in the Design and Access Statement or within the planning submission documents, but the documents do make reference to specific guide lines in the external environment which would have been based on advice given from our department.

Whilst in principle we have no objections to the application, we would still recommend attaching of suitably worded conditions and an informative. The comments made can easily be mitigated early if the Architects and Developer ensure that 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 form at the earliest opportunity.

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

Section 2 - Secured by Design Conditions and Informative:

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

Conditions:

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

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

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

Informative:

The applicant must seek the continual advice of the Metropolitan Police Service Designing Out Crime Officers (DOCOs) to achieve accreditation. The services of MPS DOCOs are available **free of charge** and can be contacted via docomailbox.ne@met.police.uk or 020 217 3813.

Section 3 - Conclusion:

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

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

Yours sincerely,

Lee Warwick 463TP

Designing Out Crime Officer
Metropolitan Police Service

This report gives recommendations. Please note that Crime Prevention Advice and the information in this report does not constitute legal or other professional advice; it is given free and without the intention of creating a contract or without the intention of accepting

	any legal responsibility. It is based on the information supplied and current crime trends in the area. All other applicable health, safety and fire regulations should be adhered to	
Thames Water	Thames Water confirms the surface water condition referenced (Condition 71) can be discharged based on the information submitted.	Comments noted and condition / informative included