

Appendix 3: Internal and External Consultee Representations

Stakeholder	Comment	Response
INTERNAL		
Arboricultural Officer (Trees)	<p>From an arboricultural point of view, I hold no objections.</p> <p>An arboricultural report, arboricultural impact assessment, arboricultural method statements, tree constraints plan and tree protection plan has been submitted by Tim Moya Associates dated August 2024.</p> <p>The report has been carried out to British Standard 5837: 2012- Trees in Relation to Design, Demolition and Construction- Recommendations.</p> <p>I concur with most of the document including the tree quality classification.</p> <p>!9 trees are for removal.</p> <p>X1 category B and x2 category B groups. 16 are category C and two are category U.</p> <p>Removals include T2, 6, 7, 8, 12, 13, 15, 18, 19, 44 (B2), 52, 53, 54s17, S14, G49, G55.</p> <p>The loss of these trees will have little significance and be low impact on the surrounding area.</p> <p>A Biological Net Gain and Urban Green Plan have been carried out meeting above the set targets.</p> <p>An Ecological report and Bat report appear to mitigate for any loss of habitat. The Borough's Ecological Officer will need to confirm this.</p> <p>Landscape plans have been submitted with a gross gain, good diversity, urban fitness, and interest of new trees.</p> <p>Providing the whole report and drawings are conditioned I have no objections.</p>	<p>All Landscape plans and the report form part of the recommended approved drawings.</p> <p>Conditions would also secure an Arboricultural Method Statement.</p>
Carbon Management	<p>Carbon Management Response 22/11/2024</p> <p>In preparing this consultation response, we have reviewed:</p> <ul style="list-style-type: none"> • Energy Statement prepared by XCO2 (dated Oct 2024) • Be Seen Spreadsheet • Overheating Assessment (included as Appendix A of Energy Statement) • Pre-Demolition Audit prepared by XCO2 (dated Sept 2024) 	<p>Conditions recommended and head of terms included.</p>

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	<ul style="list-style-type: none"> • Pre-Development Audit prepared by XCO2 (dated Sept 2024) • Circular Economy Statement prepared by XCO2 (dated Sept 2024) • Circular Economy Planning Spreadsheet • WLCA Planning Spreadsheet • Sustainability Statement prepared by XCO2 (dated Oct 2024) • Landscape UGF calculation combined sites prepared by JULA ltd (dated Sept 2024) • Biodiversity Net Gain Assessment prepared by TMA (dated Sept 2024) • Preliminary Ecological Appraisal prepared by TMA (dated July 2024) • Relevant supporting documents. <p>Required missing information:</p> <ul style="list-style-type: none"> • GLA's Carbon Emissions Reporting Spreadsheet • SAP worksheet of sampled units for Be Lean and Be Green stages • BRUKL worksheet for Be Lean and Be Green stages for the commercial unit • BREEAM Pre-Assessment. <p><u>Application 1</u> concerns anything within the London Borough of Haringey boundary (Residential). <u>Application 2</u> is the remaining Selby proposal within the London Borough of Enfield (Selby Centre, sports halls, playing fields).</p> <p>1. Summary The development achieves a side-wide reduction of 91% carbon dioxide emissions on site for application 1, of which domestic has also achieved 91% reduction and non-domestic has achieved 51% reduction, which is supported in principle. Some clarifications must be provided with regard to the Energy Strategy and Overheating Strategy.</p> <p>Carbon Management cannot currently support this application for the following reasons:</p> <ul style="list-style-type: none"> • Overheating assessment should include additional sampling units to represent flats with high overheating risk. <p>2. Energy Strategy Policy SP4 of the Local Plan Strategic Policies, requires all new development to be zero carbon (i.e. a 100% improvement beyond Part L 2021). The London Plan (2021) further confirms this in Policy SI2.</p> <p>The overall predicted reduction in CO₂ emissions for the development shows an improvement of approximately 91% site wide (91% for residential and 55% for non-residential) in carbon emissions with SAP10.2 carbon factors, from the Baseline development model (which is Part L 2021 compliant). This represents a side-wide annual saving of approximately 181.3 tonnes of CO₂ from a baseline of 200 tCO₂/year.</p>	

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	<p>The EUI of the residential units is exceptionally high, which we cannot support.</p> <p>The applicant has explained the current calculation is based on simplistic assumptions used in the BREDEM methodology which overestimates the energy usage. It does not account for energy efficient white good which are proposed in this development and it assumes long hours of usage which would not match reality. In addition, the Meridian Heat Network has a low carbon factor resulting in low site-wide emissions, the applicant has further explained that the decentralised energy networks (DENs) must be modelled with a system efficiency of 100% impacting the associated energy consumption and EUI.</p> <p>However, the EUI based on BREDEM methodology does provide an indication of energy usage. The proposed EUI is over than double of the GLA benchmark. Applicant needs to provide a more accurate method of EUI estimation and/or explore ways to reduce the EUI to align with GLA benchmark.</p> <p><u>Actions:</u></p> <ul style="list-style-type: none">- The reason that the methodology currently overestimates the energy usage is insufficient to provide an explanation on why EUI is over than double of the GLA benchmark. Applicant to provide more detailed explanation.- Please can further explain why the DENs must be modelled with a system efficiency of 100% and that would impact on the EUI.- Applicant to explore ways to reduce the EUI to align with the GLA benchmark and to provide a more accurate method of EUI estimation to demonstrate the alignment if necessary.- <p>Energy – Lean</p> <p>The applicant has proposed a saving of 62.2 tCO₂ in carbon emissions (31 %) through improved energy efficiency standards in key elements of the build. This goes beyond the minimum 10% reduction set in London Plan Policy SI2, so this is supported.</p> <p>The following u-values, g-values and air tightness are proposed:</p> <table><tr><td>Floor u-value</td><td>0.10 W/m²K</td></tr><tr><td>External wall u-value</td><td>0.15 W/m²K</td></tr><tr><td>Roof u-value</td><td>0.10 W/m²K</td></tr><tr><td>Door u-value</td><td>1.00 W/m²K</td></tr><tr><td>Window u-value</td><td>1.20 W/m²K</td></tr><tr><td>G-value</td><td>0.50</td></tr><tr><td>Air permeability rate</td><td>3 m³/hm² @ 50Pa</td></tr><tr><td>Ventilation strategy</td><td>Mechanical ventilation with heat recovery for both residential and non-residential</td></tr></table>	Floor u-value	0.10 W/m ² K	External wall u-value	0.15 W/m ² K	Roof u-value	0.10 W/m ² K	Door u-value	1.00 W/m ² K	Window u-value	1.20 W/m ² K	G-value	0.50	Air permeability rate	3 m ³ /hm ² @ 50Pa	Ventilation strategy	Mechanical ventilation with heat recovery for both residential and non-residential	
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	Waste Water Heat recovery	TBC																								
	Thermal bridging	Y-value of 0.04-0.08 W/m²K																								
	Low energy lighting	All are low energy lighting including LED, compact fluorescent or fluorescent luminaires.																								
	Heating system (efficiency / emitter)	TBC																								
	Thermal mass	TBC																								
	Improvement from the target fabric energy efficiency (TFEE)	12.9% improvement, from 33.20 (TFEE) to 29.93 (DFEE) MWh/year																								
	Proposed percentage of glazed area: Table 3: Percentage of glazed area for each façade orientation for the proposed development																									
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<ul style="list-style-type: none">- Please specify the heating strategy and ventilation system assumed under the Baseline and Be Lean scenarios (including the gross efficiency figure(s)). For residential applications the baseline should be a gas boiler. For non-residential applications the baseline should align with the proposed heating system, i.e. if proposing an air source heat pump, this should be specified with the efficiency values set out in Part L 2021 for that system under Be Lean.- While the U-value of external walls is better than that of the notional dwelling, but the proposed U-value of external walls can be improved further.- Please confirm if waste water heat recovery is proposed.- Please identify on a plan where the MVHR units will be located within the dwellings. The units should be less than 2m away from external walls. This detail can also be conditioned.- Applicant to confirm if lighting will be 100% LED light fittings instead of compact fluorescent or fluorescent luminaires as the latter have lower luminous efficacy (lm/W).- The ES has indicated the development will aim to achieve a Y-value of 0.04-0.08 on average exceeding the Y-value of 0.08 for the notional building. This is to be achieved by focusing on using hi-therm lintels and materials with thermal breaks. This will be conditioned.																										

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	<p>- What is the construction of the building and what is the assumed thermal mass?</p> <p>Overheating is dealt with in more detail below.</p> <p>Energy – Clean London Plan Policy SI3 calls for major development in Heat Network Priority Areas to have a site-wide communal low-temperature heating system, with the heat source selected from a hierarchy of options (with connecting to a local existing or planned heat network at the top). Policy DM22 of the Development Management Document supports proposals that contribute to the provision and use of Decentralised Energy Network (DEN) infrastructure. It requires developments incorporating site-wide communal energy systems to examine opportunities to extend these systems beyond the site boundary to supply energy to neighbouring existing and planned future developments. It requires developments to prioritise connection to existing or planned future DENs.</p> <p>The development is within 600 meters of a planned future DEN, so the development is expected to secure a connection subject to demonstration of technical feasibility and financial viability.</p> <p>The applicant has proposed a connection to the planned Meridian Water Heat Network in Enfield to supply the full space heating and hot water demand. This is supported.</p> <p>Rather than a single site wide system, two separate systems are proposed for the non-residential and residential areas due to differences in management and phasing. It is also worth noting that because connection to MWHN has been confirmed, it is essentially a single system. This is therefore acceptable.</p> <p>The applicant has provided evidence of conversation with the energy provider, Energetik, who have confirmed a connection to the network is viable and potentially in line with the construction programme of the proposed development (November 2026). If the connection to the heat network is not available when required, the development has proposed a temporary boiler back-up strategy.</p> <table border="1"> <tr> <td>Carbon saving</td><td>126.9 tCO₂ (63%)</td><td>Site wide (Application 1)</td></tr> <tr> <td>Carbon factor</td><td>0.025, assuming a 'new' network (after accounting for primary and secondary heat losses)</td><td>Provided by Energetik using waste heat when the heat network commences operation in November 2026.</td></tr> <tr> <td>Distribution loss factor (DLF)</td><td>1.27</td><td>Details in Appendix G – assumes 15% losses within secondary network which should be secured through condition/obligation</td></tr> </table>	Carbon saving	126.9 tCO ₂ (63%)	Site wide (Application 1)	Carbon factor	0.025, assuming a 'new' network (after accounting for primary and secondary heat losses)	Provided by Energetik using waste heat when the heat network commences operation in November 2026.	Distribution loss factor (DLF)	1.27	Details in Appendix G – assumes 15% losses within secondary network which should be secured through condition/obligation	
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	Heating substation location	Plot 5, to supply heat to all proposed residential plots.	Separate heating substations are proposed for the Selby Centre, and the future sports hall which is being considered under Application 2.	
	Temporary heating strategy if connection is not yet available	Temporary gas boilers; north of Plot 5 within the red line	Details in Appendix H. Applicant to confirm if they are not permanent or they will function as permanent backup boilers to provide resilience if heat from the DEN is not available.	
	<p>The applicant has submitted location plans showing proposed locations of the temporary backup boilers and Energetik substations.</p> <p>The applicant will need to demonstrate that they will provide the following details prior to the commencement of construction:</p> <ul style="list-style-type: none"> a) Details of the buried primary (MWHN) pipe (dry and filled with nitrogen) the GF plant rooms to the boundary of the site and evidence of any obstructions in highway adjacent to connection point; b) A good quality secondary network within the housing development – e.g. 60/40 Flow & Return, <60W/dwelling losses from the network – ideally to an agreed standard in the S106 (noting that a 60W/dwelling heat loss is consistent with the assumed 15% losses included in the DLF of 1.27 assuming 3500kWh per dwelling); c) A clear plan for QA of the network post-planning approval through to operation, based on CP1; d) A clear commercial strategy identifying who will sell energy to residents and how prices/quality of service will be set. <p><u>Actions:</u></p> <ul style="list-style-type: none"> – We understand a temporary boiler back-up strategy is provided in case the construction phase of the development is out of sync with the DEN extension. – Please confirm if the construction phase is in line with DEN extension planned for November 2026. – What are the assumed heat losses from main network to site, within the secondary and tertiary networks (e.g. in corridors in W/sqm and by dwelling in W/dwelling)? – Please confirm if the DEN network will also provide space and water heating to the commercial unit. 			

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Stakeholder	Comment	Response
	 <p data-bbox="533 805 855 821">Figure 6. Proposed PV layout for the Selby Centre development.</p> <ul data-bbox="459 826 1758 991" style="list-style-type: none"> - What are the PV requirements of the notional dwelling in kgCO₂p.a. and kWh/m²? We are trying to understand the shortfall of PV output. - Applicant to confirm the proposed PV layout has taken considerations of the technical requirements of the biosolar roof beneath, as well as the roof maintenance access and fall restraint system. Would the gap highlighted below be sufficient for maintenance access? 	

Stakeholder	Comment	Response
	<div data-bbox="504 140 1198 774" data-label="Image"> </div> <ul style="list-style-type: none"> - The electricity generated from PV is proposed to supply to the domestic landlord areas only. This contradicts to the section about “flexibility and peak energy demand” in the ES which has stated the installation of PV will directly supply the residential units with electricity. Applicant to clarify. - If the electricity generated from PV is proposed to supply to landlord areas only. Applicant to review if this can be supplied to residents and the commercial unit directly as well before surplus is exported potentially back to the grid? <p>Energy – Be Seen London Plan Policy SI2 requests all developments to ‘be seen’, to monitor, verify and report on energy performance. The GLA requires all major development proposals to report on their modelled and measured operational energy performance. This will improve transparency on energy usage on sites, reduce the performance gap between modelled and measured energy use, and provide the applicant, building managers and occupants clarity on the performance of the building, equipment and renewable energy technologies.</p> <p>A monitoring strategy will be put in place to ensure that the actual energy performance of the development can be monitored and reported post-occupation. Performance and output of PV system will also be monitored.</p>	

Stakeholder	Comment	Response
	<p>Heating controls in dwellings will comprise of a charging system linked to the use of community heating and programmers and space conditioning in the non-domestic areas will be controlled by local time control and local temperature control.</p> <p>The applicant has confirmed that the smart meters will be installed to monitor the heat and electricity consumption of each dwelling; the display board will demonstrate real-time and historical energy use data and will be installed at an accessible location within the dwellings.</p> <p><u>Actions:</u></p> <ul style="list-style-type: none"> - Please confirm if smart meters will also be installed to the commercial unit too. - 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) <p>3. Carbon Offset Contribution</p> <p>A carbon shortfall of 18.9 tCO₂/year remains. The remaining carbon emissions will need to be offset at £95/tCO₂ over 30 years plus 10% maintenance fee.</p> <p>4. Overheating</p> <p>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.</p> <p>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. Out of the total 202 dwelling units, the report has modelled 57 units with an overall 270 habitable spaces including 116 kitchen / living / dining rooms (KLDs), 133 double bedrooms, 21 single bedrooms, and shared communal rooms and common spaces under the London Weather Centre files.</p> <p>The commercial unit has not been modelled.</p> <p>6 iterations have been modelled with 2020s weather files and 3 further iterations have used DSY1 2050's. Due to the noise constraints of this site being adjacent to an industrial site to the East, an analysis has been undertaken assuming all windows are able to open to a maximum of 10% of the floor area, other than the windows to the eastern façade of Block 5 which must remain closed overnight. This is represented in iteration 04.</p>	

Stakeholder	Comment	Response																																				
	<p>Given the East façade of Block 5 is the most acoustically restricted and therefore the windows on this façade have been modelled as closed at night, the associated flats will have higher overheating risk. However only a small portion of these flats on the East façade has been sampled, therefore the scope of the sample flats should be adjusted to include flats with higher overheating risk.</p> <p>All spaces in iteration 04 pass the overheating requirements for 2020s DSY1. In order to pass this, the following measures will be built:</p> <ul style="list-style-type: none">- Natural ventilation, with inward opening windows openable to at least 90°.- External shade including slight recesses to windows and balconies where present, protruding lintels and external walkways and columns- Internal shading blinds via opaque blinds (while not included in compliance calculation in line with GLA guidance)- Glazing g-value of 0.5- No active cooling <p>Proposed future mitigation measures include:</p> <ul style="list-style-type: none">- Movable external shutters- Cooling coils to the MVHR system <p>Results for domestic units are listed in the table below:</p> <table><tr><th rowspan="3">Domestic: CIBSE TM59</th><th rowspan="3">Design parameters</th><th colspan="3">Predominantly naturally ventilated</th></tr><tr><th>Criterion A KLDS (<3% hours)</th><th>Criterion A Bedrooms (<3% hours)</th><th>Criterion B for bedrooms (less than 33 hours)</th></tr><tr><th colspan="3">No. of rooms not meeting criteria</th></tr><tr><td colspan="5">DSY1 2020s</td></tr><tr><td>Iteration 01</td><td>Baseline including all external shading</td><td>109/116</td><td>129/154</td><td>154/154</td></tr><tr><td>Iteration 02</td><td>Increased natural ventilation with KLD windows open 24 hrs</td><td>0/116</td><td>0/154</td><td>0/154</td></tr><tr><td>Iteration 03</td><td>It_02 with 50% reduction to effective free area for required security measures to accessible KLD windows</td><td>0/116</td><td>0/154</td><td>0/154</td></tr><tr><td>Iteration 04</td><td>It_03 plus acoustic restrictions (EFA 10% of floor area and windows on east</td><td>0/116</td><td>0/154</td><td>0/154</td></tr></table>	Domestic: CIBSE TM59	Design parameters	Predominantly naturally ventilated			Criterion A KLDS (<3% hours)	Criterion A Bedrooms (<3% hours)	Criterion B for bedrooms (less than 33 hours)	No. of rooms not meeting criteria			DSY1 2020s					Iteration 01	Baseline including all external shading	109/116	129/154	154/154	Iteration 02	Increased natural ventilation with KLD windows open 24 hrs	0/116	0/154	0/154	Iteration 03	It_02 with 50% reduction to effective free area for required security measures to accessible KLD windows	0/116	0/154	0/154	Iteration 04	It_03 plus acoustic restrictions (EFA 10% of floor area and windows on east	0/116	0/154	0/154	
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Stakeholder	Comment					Response																
		façade of Block 5 are close). This reflects the current design proposal.																				
	DSY2 2020s																					
	Iteration 05	It_04 with DSY 2 weather file	104/116	1/154	154/154																	
	DSY3 2020s																					
	Iteration 06	It_04 with DSY 3 weather file	115/116	1/154	154/154																	
	DSY1 2050s																					
	Iteration 07	It_04 with DSY 1 2050s weather file	82/116	1/154	154/154																	
	Iteration 08	It_07 plus external shading	9/116	0/154	154/154																	
	Iteration 09	It_08 plus cooling coils to MVHR system	7/116*	0/154	0/154																	
	* Seven units have marginally failed by 0.1-0.4% and applicant has explained they therefore do not post a significant overheating risk.																					
Results for communal corridor are listed in the table below:																						
<table><tr><th rowspan="2">Domestic: CIBSE TM59</th><th rowspan="2">Design parameters</th><th colspan="2">Mechanical ventilation</th></tr><tr><th>% Annual hours > 28C</th><th>Criteria Met</th></tr><tr><td>Iteration_01</td><td>Mechanical ventilation 15 L/s in DSY1 2020s</td><td>0.13%</td><td>Y</td></tr><tr><td>Iteration 02</td><td>Mechanical ventilation 15 L/s in DSY2 2020s</td><td>1.55%</td><td>Y</td></tr><tr><td>Iteration 03</td><td>Mechanical ventilation 15 L/s in DSY3 2020s</td><td>2.06%</td><td>Y</td></tr></table>					Domestic: CIBSE TM59	Design parameters	Mechanical ventilation		% Annual hours > 28C	Criteria Met	Iteration_01	Mechanical ventilation 15 L/s in DSY1 2020s	0.13%	Y	Iteration 02	Mechanical ventilation 15 L/s in DSY2 2020s	1.55%	Y	Iteration 03	Mechanical ventilation 15 L/s in DSY3 2020s	2.06%	Y
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The submitted overheating strategy is not considered acceptable, additional sample units are required to include units with high overheating risk.																						
<u>Actions:</u> <ul style="list-style-type: none">- Sampling units should include more flats on the East façade with windows closed at night due to acoustic restrictions.- Please can you confirm if the scope of the sampling units has covered the following:<ul style="list-style-type: none">o All single-aspect rooms facing west, east, and south;o At least 50% of rooms on the top floor;o 75% of all modelled rooms facing South or South/West;o Rooms closest to any significant noise and / or air pollution source, with windows closed at all times (with cross reference to the Noise and the Air Quality Assessments to demonstrate the most sensitive receptors and the AVO Residential Design Guide);- Please provide the number and scope of the communal corridor modelled.																						

Stakeholder	Comment	Response
	<ul style="list-style-type: none"> - Please confirm if there are windows in communal corridors for natural ventilation? If so, please provide modelling of communal corridor with natural ventilation prior to mechanical ventilation. - Windows to the eastern façade of Block 5 have been modelled as closed, please can applicant clarify if the associated habitable rooms will be modelled as mechanically ventilated? - Please model mechanical ventilation with MVHR as proposed in the development before the incorporation of cooling coils in iteration 09, this helps to identify the extent of cooling coils needed. - Please confirm if the MVHR system has summer by-pass function. - Please demonstrate how the external shutters can be installed in the retrofit plan for future - Please confirm if the cooling coils in the retrofit fit plan do not form part of the current proposal and confirm the extent of this requirement. - Please specify the specification and the energy requirement of the cooling coil. - Identify communal spaces (indoor and outdoor) where residents can cool down if their flats are overheating. - This development should have a heatwave plan / building user guide to mitigate overheating risk for occupants. <p>5. Sustainability</p> <p>Policy DM21 of the Development Management Document requires developments to demonstrate sustainable design, layout and construction techniques. The sustainability section in the report sets out the proposed measures to improve the sustainability of the scheme, including transport, health and wellbeing, materials and waste, water consumption, flood risk and drainage, biodiversity, climate resilience, energy and CO2 emissions and landscape design.</p> <p>The following sustainability measures have been proposed:</p> <ul style="list-style-type: none"> • Water efficiency measures such as water efficient sanitary fittings, provision of water butt to reduce water consumption to less than 105 litres per person per day. • 4 SUDS measures including green roofs on all buildings, rain gardens, permeable pavement and attenuation basins (in Application 2) will be incorporated. • A total 400 long stay cycle spaces within buildings or courtyards and 15 short stay spaces for visitors have been provided. • The Ecological Appraisal has set out the recommendations to incorporate bird boxes, bat boxes, hedgehog boxes and invertebrate boxes. <p><u>Action:</u></p> <ul style="list-style-type: none"> - The recommendations from the Ecological Appraisal have not been incorporated into the drawings. Please set out the proposed locations and number of wildlife boxes. 	

Stakeholder	Comment	Response
	<ul style="list-style-type: none"> - Set out how water demand will be reduced, e.g. rainwater harvesting, grey water system. Please confirm if water butts will be provided. - Set out how surface water runoff will be reduced, that it will be separated from wastewater and not discharged into the sewer. <p><i>Non-Domestic BREEAM Requirement</i> Policy SP4 requires all new non-residential developments to achieve a BREEAM rating 'Very Good' (or equivalent), although developments should aim to achieve 'Excellent' where achievable.</p> <p>The applicant has not submitted a BREEAM Pre-Assessment Report for the commercial unit.</p> <p><u>Actions:</u></p> <ul style="list-style-type: none"> - Submit the BREEAM Pre-Assessment report, or an alternative accreditation scheme. - A table should be submitted to demonstrate which credits will be met, how many are met out of the total available, under which category, which could be achieved and which will not be met. This needs to include justification where targets are not met or 'potential' credits (where they are available under the Shell and Core assessment). This will enable better assessment of which credits. <p><i>Urban Greening / Biodiversity</i> All development sites must incorporate urban greening within their fundamental design and submit an Urban Greening Factor Statement, in line with London Plan Policy G5. London Plan Policy G6 and Local Plan Policy DM21 require proposals to manage impacts on biodiversity and aim to secure a biodiversity net gain. Additional greening should be provided through high-quality, durable measures that contribute to London's biodiversity and mitigate the urban heat island impact. This should include tree planting, shrubs, hedges, living roofs, and urban food growing. Specifically, living roofs and walls are encouraged in the London Plan. Amongst other benefits, these will increase biodiversity and reduce surface water runoff.</p> <p>The Biodiversity Net Gain calculation shows a net gain of 17.53%, which is above the 10% requirement as set out in the Environment Act 2021.</p> <p>The development has achieved an Urban Greening Factor (UGF) of 0.405 for Application 1. This has achieved the minimum requirement of 0.4 for residential development in line with London Plan Policy G5.</p> <p><u>Actions:</u></p> <ul style="list-style-type: none"> - The proposed UGF has just reached the minimum requirement, applicant is encouraged to further improve the UGF. For example, applicant can further introduce planting along the main pedestrian route. 	

Stakeholder	Comment	Response				
	<p>Living roofs</p> <p>All development sites must incorporate urban greening within their fundamental design, in line with London Plan Policy G5.</p> <p>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.</p> <p>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.</p> <p>Climate Change Adaptation</p> <p>Developments of this size should have a climate change adaptation strategy in place for residents and visitors to help the area become more resilient against the impacts of climate change. This should include adaptation to increased risk of flooding and wind-based impacts from more frequent and severe storm events, longer periods of drought (in relation to the soft landscaping and limiting occupant water use), more intense and longer heatwaves. The development should allocate publicly accessible ‘cool spaces’, following the GLA’s criteria for cool spaces and to form part of the wider cool spaces map.</p> <p>The Sustainability Statement has referred to the Overheating Section of the Energy Statement and the SUDS proposal in the Flood Risk Assessment as their strategies for Climate Change Adaptation.</p> <p><u>Action:</u></p> <ul style="list-style-type: none">- Identify in what ways the development will increase the resilience of residents and businesses and adapt their public realm to the impacts of climate change. <p>Whole Life-Cycle Carbon Assessments</p> <p>Policy SI2 requires developments referable to the Mayor of London to submit a Whole Life-Cycle Carbon Assessment and demonstrate actions undertaken to reduce life-cycle emissions.</p> <p>The total calculated emissions based on the GIA (without grid decarbonisation) is estimated at:</p> <table><tr><td></td><td>Estimated carbon emissions</td><td>GLA benchmark RESIDENTIAL</td><td>Embodied carbon rating (Industry-wide)</td></tr></table>		Estimated carbon emissions	GLA benchmark RESIDENTIAL	Embodied carbon rating (Industry-wide)	
	Estimated carbon emissions	GLA benchmark RESIDENTIAL	Embodied carbon rating (Industry-wide)			

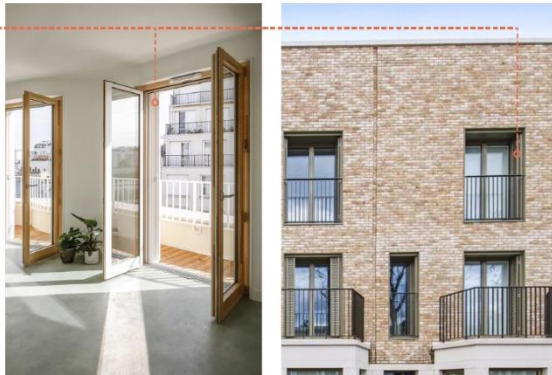
Stakeholder	Comment				Response
	Product & Construction Stages Modules A1-A5 (excl. sequestration)	827kgCO ₂ e/m ²	Meets GLA benchmark (<850 kgCO ₂ e/m ²) but misses the aspirational target (<500 kgCO ₂ e/m ²).	Modules A1-A5 achieve a band rating of 'E', not meeting the LETI 2020 Design Target.	
	Use and End-Of-Life Stages Modules B-C (excl. B6 and B7)	490kgCO ₂ e/m ²	Does not meet 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)	1193kgCO ₂ e/m ²	Meets GLA target (<1200 kgCO ₂ e/m ²) but missed the aspirational benchmark (<800 kgCO ₂ e/m ²).	Modules A1-B5, C1-4 (incl sequestration) achieve a letter band rating of 'E', not meeting the RIBA Built Target.	
	Use and End-Of-Life Stages Modules B6 and B7	554kgCO ₂ e/m ²	N/A		
	Reuse, Recovery, Recycling Stages Module D	-25kgCO ₂ e/m ²	N/A		
<p>Circular Economy</p> <p>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.</p> <p>The Circular Economy Statement has acknowledged the six circular economy principles in accordance with the GLA's Circular Economy Statements Guidance. The Circular Economy Statement is fairly high level.</p> <p>The following project specific strategies have been employed:</p> <ul style="list-style-type: none">At least 95%of demolition and excavation waste will be used and/or recycled. Special attention will be given to topsoil from excavation activities, such as no topsoil is sent to landfill.					

Stakeholder	Comment	Response
	<ul style="list-style-type: none"> • 100% of the timber will be sourced from FSC or PEFC source. • Main contractor will be required to prioritise products holding EM/ISO14001 responsible sourcing certification. • 100% concrete will be BES 6001 certified. • Steel reinforcement to contain 87% recycled content. • The stacked design of the units contributes to the efficient use of materials and minimize construction waste. • Use of lime mortar has been considered. • Assumed 30% GGBS replacement for concrete within the superstructure. <p><u>Actions:</u></p> <ul style="list-style-type: none"> - Applicant is strongly encouraged to develop further project-specific strategies in line with the circular economy principles. - The demand of GGBS has outstripped the supply in UK, currently GGBS is imported as noted in the CE report. This diminishes the benefits of using GGBS. Applicant is encouraged to explore alternative along with GGBS. - Use of lime mortar is encouraged. <p>6. Planning Conditions To be secured (with detailed wording TBC)</p> <ul style="list-style-type: none"> - Energy strategy - Overheating - BREEAM Certificate - Living roof(s) - Circular Economy (Pre-Construction report, Post-Completion report) - Whole-Life Carbon - Biodiversity - Be Seen commitment to uploading energy data - Energy Plan - Sustainability Review <p>7. Planning Obligations Heads of Terms</p> <ul style="list-style-type: none"> - Estimated carbon offset contribution (and associated obligations) of £53,900 (indicative), plus a 10% management fee; carbon offset contribution to be re-calculated at £2,850 per tCO2 at the Energy Plan and Sustainability stages. - DEN connection (and associated obligations) - Heating strategy fall-back option if not connecting to the DEN - Deferred offset contribution, if an alternative low-carbon heating strategy is implemented. 	

Stakeholder	Comment	Response		
	<p>Carbon Management Response 19/02/2025</p> <p>In preparing this consultation response, we have reviewed:</p> <ul style="list-style-type: none">• Written response prepared by the applicant dated 23rd Jan 2025 (this superseded the written response prepared by XCO2 dated 23rd Oct 2024)• SAP worksheet for Be Lean and Be Green stages• GLA Carbon emission reporting spreadsheet• Proposed heat network site plan (20049-LHE-ZZ-XX-DR-C-HEAT-08 - SELBY PROPOSED HEAT.pdf)• Plot 5 Typical Bays• Plot 6 Typical Bays• Plot 7 Typical Bays• 2. Selby urban Village_GLA CE Memo_Stage 1_12.11.2024• 2. Selby Urban Village_GLA WLC Memo_12.11.24• 20240568 Selby Urban Village - GLA consultation (Stage 1) - Energy Memo 2024 <p>1. Summary</p> <p>The development achieves a side-wide reduction of 91% carbon dioxide emissions on site for application 1, of which domestic has also achieved 91% reduction and non-domestic has achieved 51% reduction, which is supported in principle. Planning conditions have been recommended to secure the benefits of the scheme.</p> <p>It is understood that applicant will address GLA’s comments on Circular Economy, WLCA and Energy Memo separately in Stage 2 of the GLA’s referral process.</p> <p>2. Energy Strategy</p> <p>Applicant has clarified the cumulative percentage for residential is 91%, the mathematical discrepancy to the GLA carbon emission reporting spreadsheet was due to the rounding up of numbers. Therefore there is no change to the percentage reduction as shown in the table above.</p> <p>Applicant has further explained the high EUI was due to the default overestimation of unregulated energy from BREDEM methodology. In addition, the carbon factor benefit has not accounted for as the DEN must be modelled with an efficiency of 100% to be in line with BRE guidance.</p> <p>Energy – Lean</p> <p>The applicant has provided the following updates:</p> <table><tr><td>Waste Water Heat recovery</td><td>Not proposed as it is incompatible with DHN system.</td></tr></table>	Waste Water Heat recovery	Not proposed as it is incompatible with DHN system.	
Waste Water Heat recovery	Not proposed as it is incompatible with DHN system.			

Stakeholder	Comment		Response
	Low energy lighting	All lighting will be LED	
	Heating system (efficiency / emitter)	Residential: Gas-boilers with efficiency of 89.5%. Commercial: DEN for space heating and hot water (carbon factor of 0.23 kg CO ² /kWh and a primary energy factor of 1.05 kWhPE/kWh)	
	Thermal mass	250kJ/m ² K (concrete framed building with a solid brick façade)	
	Energy – Clean Applicant has confirmed the following: <ul style="list-style-type: none">- DHN has confirmed the connection will be feasible. A temporary energy strategy has also been developed if any delays occur.- Secondary network losses will be designed to meet CP1 criteria of less than 100W per dwelling. In the absence of specific HIU data, tertiary losses based on SAP 1.46kWh/day standing heat loss from HIU (equivalent to 60W per HIU).- Commercial unit is shell and core fit out only. Capped off connection points will be provided. Modelling has assumed connection to the DEN network.- Site plan (drawing number - 20049-LHE-ZZ-XX-DR-C-HEAT-08 - SELBY PROPOSED HEAT NETWORK.pdf) has been provided to show the location of pipe layout between the connection point and plant room. Actions: <ul style="list-style-type: none">- The standing heat loss from HIU is too high, it should be ideally below maximum 50W. Applicant to revise their strategy to reduce the standing heat loss. Energy – Green Applicant has confirmed the following: <ul style="list-style-type: none">- In response to the integrating additional PV panels to the lower roofs on Block 6 and 8, safe access to roof cannot be provided in those roofs as there are no cores underneath. In addition, the parapets of those roofs are deliberately low to reduce perceived massing and not overshadow the school playing fields.- Calculations for the shortfall of PV output compared with notional building: Calculation of notional PV is based on 40% of dwelling floor area / (6.5 x number of storeys in block). Total building savings per annum: notional PV 19.6tCO₂, proposed PV 11.8tCO₂.- Roof access around PVs: Applicant has confirmed they have spoken to specialist suppliers. No fall restraint system on roof is needed as the proposed parapet height is high enough to provide fall protection.- Applicant has confirmed electricity generated by the PVs will be supplied to the landlord areas with excess sold to the grid, instead of supplying to the residential units. As the implementation		

Stakeholder	Comment	Response
	<p>of sharing PV generated electricity would be too complex and costly at this point. However in detailed development stage applicant will investigate alternative utilisation of the PV array to support heating system for pumps / buffer vessels or directly into each flat.</p> <p>Further investigation into the utilisation of electricity generated by PVs on site in later design stage is encouraged.</p> <p>Energy – Be Seen Applicant has confirmed the following:</p> <ul style="list-style-type: none"> - Commercial unit is shell and core fit out only, therefore it is unknown if the occupant will install smart meters. - Planning stage Be Seen webform will be submitted after planning stage carbon emissions have been agreed. <p>Applicant is encouraged to integrate the requirement of smart meter installation into the lease agreement for the commercial unit.</p> <p>4. Overheating Applicant has clarified only the East façade of Plot 5 has risk of acoustic issues and all the habitable rooms on this façade are living rooms and kitchens, hence they are not required by Part O to be modelled closed at night due to noise restraints.</p> <p>The scope of the sampling units has been clarified as follows:</p> <ul style="list-style-type: none"> - Only Plot 5 has one single aspect unit typology and they have modelled the worst-scenario of this single-aspect on the top floor. - 58% of top floor rooms were modelled. - 75% of S/SW were modelled. - There are no significant sources of air pollution for this site. All habitable rooms on site had window restrictions of 10% effective free area relative to floor area, which was found to be sufficient to mitigate acoustic issues as per the Acoustic Assessment. Over 28% of all units were captured within the modelled sample. - Only the worst-case corridor on the top floor of plot 7 was sampled and it is modelled on mechanical ventilation, as there are no openable windows are proposed for the communal corridors as the responsibility of opening the communal windows cannot be placed on an individual resident. <p>Applicant has confirmed the following:</p> <ul style="list-style-type: none"> - MVHR will have summer by-pass function. - The depth of the façade and masonry construction will be deep enough to accommodate the folding shutters in the future. Examples of folding shutters have been included as below: 	

Stakeholder	Comment	Response
	<p>FUTURE PROOFING SHUTTERS Robust construction and deep facade</p> <p>Depth of facades and strength of solid masonry construction means that, if necessary, in the future, metal concertina shutters could be fitted to the residential facades</p>  <p><i>Metal concertina shutters, Jean-Cristophe Quinton, Paris</i> <i>Metal folding shutters, Elephant and Castle, London</i></p> <ul style="list-style-type: none"> - - Cooling coils are only required for the future retrofit scenario. The cooling coil specification is Nuaire MR-ECO-COOL-V unit and the energy requirement is 1.73kW. - Communal spaces where residents can cool down: Units include balcony spaces and communal courtyards. Residents will have access to the playing fields on the adjacent site. - Haringey Housing to provide the building user guide to mitigate overheating risk for occupants. <p>Sustainability The incorporation of recommendations from Ecological Appraisal and water butts will be conditioned.</p> <p>Non-Domestic BREEAM Requirement The applicant has not carried out a BREEAM Pre-Assessment as the commercial unit is only 85m2 and they have stated that a BREEAM assessment would compromise the viability of the unit.</p> <p>On balance, the site-wide has achieved an overall 91% carbon reduction, therefore it is acceptable that the BREEAM certification is not required. However applicant is required to submit a pre-assessment and ensure the benefits are integrated into the design. This will be conditioned.</p> <p>Climate Change Adaptation The following strategies have been proposed to increase the climate resilience of the residents and businesses:</p> <ul style="list-style-type: none"> - Planting includes drought resistant species; green roofs reduce urban heat island effect; building user guide to include section on overheating mitigation; balconies provide residents with external 	

Stakeholder	Comment	Response
	<p>shaded spaces during warmer periods; MVHR includes summer by-pass function; street trees and tree planting provide shading in courtyards and reduce local temperatures</p> <ul style="list-style-type: none"> - The team is proposing future retrofit strategy for more extreme weather, such as installation of cooling coils as part of the MVHR and/or window shutters. <p>Further work should be undertaken to ensure that the climate adaptation and resilience strategy responds to the London Climate Resilience Review, and any forthcoming action plans.</p> <p><i>Circular Economy</i></p> <p>A range of project specific strategies were developed, and will be continued to be developed throughout the detailed design stage to ensure compliance with all GLA targets:</p> <ul style="list-style-type: none"> - The site was developed to be cut and fill neutral. - Basements were avoided for all residential elements to avoid excavation. - Structural grids were optimised to minimise the requirement for transfer structures. Loadbearing walls have been avoided where possible, maximises flexibility for future redevelopment. - Standardised window sizes were used throughout to minimise waste. - SWMP and OWMP have been produced to provide guidance on waste minimisation. - The energy strategy proposes connection to the district heating network, reducing requirement for new plant. <p>In response to the supply issue of GGBS, applicant has clarified other supplementary cementitious materials options such as calcined clays and limestone fines will also be explored in the detailed design stage.</p> <p>Applicant has confirmed lime mortar will only be used for the Bull Lane playing fields element of the masterplan, but not for the residential part of the project due to differing design requirements and concern over costs. This is regrettable as applicant should explore the feasibility of the use of lime mortar in detailed development stage instead of rejecting the use of it from the outset due to concern over costs. Applicant is encouraged to reconsider the use of lime mortar when opportunities arise.</p> <p><i>Planning Conditions</i></p> <p><u><i>Energy Strategy</i></u></p> <p><i>The development hereby approved shall be constructed in accordance with the Energy Statement by XCO2 (dated Oct 2024) delivering a minimum 91% improvement on carbon emissions over 2021 Building Regulations Part L, with high fabric efficiencies, connection to DEN and a minimum 229 kWp solar photovoltaic (PV) array.</i></p> <p><i>(a) Prior to above ground construction, details of the Energy Strategy shall be submitted to and approved by the Local Planning Authority. This must include:</i></p>	

Stakeholder	Comment	Response
	<ul style="list-style-type: none"> - Confirmation of how this development will meet the zero-carbon policy requirement in line with the Energy Hierarchy; - Confirmation of the necessary fabric efficiencies to achieve a minimum 31% reduction; - Details to thermal bridging and demonstrate a Y-value of 0.04-0.08 W/m²K or lower has been achieved. - Specification and efficiency of the proposed Mechanical Ventilation and Heat Recovery (MVHR), with plans showing the rigid MVHR ducting and location of the unit; - Details of the PV, demonstrating the roof area has been maximised, with the following details: a roof plan; the number, angle, orientation, type, and efficiency level of the PVs; how overheating of the panels will be minimised; their peak output (kWp) and annual energy generation (kWh/year); inverter capacity; and how the energy will be used on-site before exporting to the grid; - Details of investigation into optimising the usage of electricity generated by PVs on site, in addition to using electricity in landlord areas with excess exported back to grid; - Specification of any additional equipment installed to reduce carbon emissions, if relevant; - A metering strategy <p>The development shall be carried out strictly in accordance with the details so approved prior to first operation and shall be maintained and retained for the lifetime of the development.</p> <p>(b) The solar PV arrays must be installed and brought into use prior to first occupation of the relevant block. Six months following the first occupation of that block, evidence that the solar PV arrays have been installed correctly and are operational shall be submitted to and approved by the Local Planning Authority, including photographs of the solar array, installer confirmation, an energy generation statement for the period that the solar PV array has been installed, and a Microgeneration Certification Scheme certificate. The solar PV array shall be installed with monitoring equipment prior to completion and shall be maintained at least annually thereafter.</p> <p>(c) Within six months of first occupation, evidence shall be submitted to the Local Planning Authority that the development has been registered on the GLA's Be Seen energy monitoring platform.</p> <p>(d) Within one year of first occupation, evidence shall be submitted to and approved by the Local Planning Authority to demonstrate how the development has performed against the approved Energy Strategy and to demonstrate how occupants have been taken through training on how to use their homes and the technology correctly and in the most energy efficient way and that issues have been dealt with. This should include energy use data for the first year and a brief statement of occupant involvement to evidence this training and engagement.</p> <p>Reason: To ensure the development reduces its impact on climate change by reducing carbon</p>	

Stakeholder	Comment	Response
	<p><i>emissions on site in compliance with the Energy Hierarchy, and in line with London Plan (2021) Policy SI2, and Local Plan (2017) Policies SP4 and DM22.</i></p> <p><u><i>DEN Connection</i></u> <i>Prior to the above ground commencement of construction work, details relating to the future connection to the DEN must be submitted to and approved by the local planning authority. This shall include:</i></p> <ul style="list-style-type: none"> <i>• Further detail of how the developer will ensure the performance of the DEN system will be safeguarded through later stages of design (e.g. value engineering proposals by installers), construction and commissioning including provision of key information on system performance required by CoP1 (e.g. joint weld and HIU commissioning certificates, CoP1 checklists, etc.);</i> <i>• Peak heat load calculations in accordance with CIBSE CP1 Heat Networks: Code of Practice for the UK (2020) taking account of diversification.</i> <i>• Detail of the pipe design, pipe sizes and lengths (taking account of flow and return temperatures and diversification), insulation and calculated heat loss from the pipes in Watts, demonstrating heat losses have been minimised together with analysis of stress/expansion;</i> <i>• A before and after floor plan showing how the plant room can accommodate a heat substation for future DEN connection. The heat substation shall be sized to meet the peak heat load of the site. The drawings should cover details of the phasing including any plant that needs to be removed or relocated and access routes for installation of the heat substation;</i> <i>• Details of the route for the primary pipework from the energy centre to a point of connection at the site boundary including evidence that the point of connection is accessible by the area wide DEN, detailed proposals for installation for the route that shall be coordinated with existing and services, and plans and sections showing the route for three 100mm diameter communications ducts;</i> <i>• Details of the location for building entry including dimensions, isolation points, coordination with existing services and detail of flushing/seals;</i> <i>• Details of the location for the set down of a temporary plant to provide heat to the development in case of an interruption to the DEN supply including confirmation that the structural load bearing of the temporary boiler location is adequate for the temporary plant and identify the area/route available for a flue;</i> <i>• Details of a future pipework route from the temporary boiler location to the plant room.</i> <p><i>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.</i></p> <p><u><i>Energy Monitoring</i></u></p>	

Stakeholder	Comment	Response
	<p><i>No development shall take place beyond the superstructure of the development until a detailed scheme for energy monitoring has been submitted to and approved in writing by the Local Planning Authority. The details shall include details of suitable automatic meter reading devices for the monitoring of energy use and renewable/ low carbon energy generation. The monitoring mechanisms approved in the monitoring strategy shall be made available for use prior to the first occupation of each building and the monitored data for each block shall be submitted to the Local Planning Authority, at daily intervals for a period of 5 years from final completion.</i></p> <p><i>Within six months of first occupation of any dwellings, evidence shall be submitted in writing to the Local Planning Authority that the development has been registered on the GLA's Be Seen energy monitoring platform.</i></p> <p><i>REASON: To ensure the development can comply with the Energy Hierarchy in line with London Plan 2021 Policy SI 2 and Local Plan Policy SP4 before construction works prohibit compliance.</i></p> <p><u><i>Overheating</i></u> <i>Prior to the above ground commencement of the development, an updated Overheating Report shall be submitted to and approved by the Local Planning Authority. The submission shall assess the overheating risk, confirm the mitigation measures, and propose a retrofit plan. This assessment shall be based on the Overheating Assessment by XCO2 (as attached in the Appendix A of the Energy Statement dated Oct 2024).</i></p> <p><i>This report shall include:</i></p> <ul style="list-style-type: none"> <i>- Revised modelling of units modelled based on CIBSE TM59, using the CIBSE TM49 London Weather Centre files for the DSY1-3 (2020s) and DSY1 2050s and 2080s, high emissions, 50% percentile with openable and closed window scenarios;</i> <i>- Demonstrating the mandatory pass for DSY1 2020s can be achieved following the Cooling Hierarchy and in compliance with Building Regulations Part O, demonstrating that any risk of crime, noise and air quality issues are mitigated appropriately evidenced by the proposed location and specification of measures by following the Cooling Hierarchy;</i> <i>- Modelling of mitigation measures required to pass current and future weather files, clearly setting out which measures will be delivered before occupation and which measures will form part of the retrofit plan;</i> <i>- Confirmation that the retrofit measures can be integrated within the design (e.g., if there is space for pipework to allow the retrofitting of cooling and ventilation equipment), setting out mitigation measures in line with the Cooling Hierarchy; this should include details to demonstrate sufficient depths have been allowed within the balcony and solid masonry construction to accommodate future external folding shutter;</i> 	

Stakeholder	Comment	Response
	<p>- Confirmation who will be responsible to mitigate the overheating risk once the development is occupied.</p> <p>(b) Prior to occupation of the development, details of internal blinds to all habitable rooms must be submitted for approval by the local planning authority. This should include the fixing mechanism, specification of the blinds, shading coefficient, etc. Occupiers must retain internal blinds for the lifetime of the development, or replace the blinds with equivalent or better shading coefficient specifications.</p> <p>(c) Prior to occupation, the development must be built in accordance with the approved overheating measures and retained thereafter for the lifetime of the development:</p> <ul style="list-style-type: none"> - Natural ventilation, with inward opening windows openable to at least 90°; - External shade including slight recesses to windows and balconies where present, protruding lintels and external walkways and columns; - Internal shading blinds via opaque blinds (while not included in compliance calculation in line with GLA guidance); - Glazing g-value of 0.5; - No active cooling; - Any further mitigation measures as approved by or superseded by the latest approved Overheating Strategy. <p>If the design of Blocks is amended, or the heat network pipes will result in higher heat losses and will impact on the overheating risk of any units, a revised Overheating Strategy must be submitted as part of the amendment application.</p> <p>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.</p> <p><u>Living roofs</u></p> <p>(a) Prior to the above ground commencement of development, details of the living roofs must be submitted to and approved in writing by the Local Planning Authority. Living roofs must be planted with flowering species that provide amenity and biodiversity value at different times of year. Plants must be grown and sourced from the UK and all soils and compost used must be peat-free, to reduce the impact on climate change. The submission shall include:</p> <ul style="list-style-type: none"> i) A roof plan identifying where the living roofs will be located; ii) A section demonstrating settled substrate levels of no less than 120mm for extensive living roofs (varying depths of 120-180mm), and no less than 250mm for intensive living roofs (including planters on amenity roof terraces); iii) Roof plans annotating details of the substrate: showing at least two substrate types across the roofs, annotating contours of the varying depths of substrate 	

Stakeholder	Comment	Response
	<p>iv) Details of the proposed type of invertebrate habitat structures with a minimum of one feature per 30m² of living roof: substrate mounds and 0.5m high sandy piles in areas with the greatest structural support to provide a variation in habitat; semi-buried log piles / flat stones for invertebrates with a minimum footprint of 1m², rope coils, pebble mounds of water trays;</p> <p>v) Details on the range and seed spread of native species of (wild)flowers and herbs (minimum 10g/m²) and density of plug plants planted (minimum 20/m² with root ball of plugs 25cm³) to benefit native wildlife, suitable for the amount of direct sunshine/shading of the different living roof spaces. The living roofs will not rely on one species of plant life such as Sedum (which are not native);</p> <p>vi) Roof plans and sections showing the relationship between the living roof areas and photovoltaic array; and</p> <p>vii) Management and maintenance plan, including frequency of watering arrangements.</p> <p>viii) A section showing the build-up of the blue roofs and confirmation of the water attenuation properties, and feasibility of collecting the rainwater and using this on site;</p> <p>(b) Prior to the occupation of 90% of the dwellings, evidence must be submitted to and approved by the Local Planning Authority that the living roofs have been delivered in line with the details set out in point (a). This evidence shall include photographs demonstrating the measured depth of substrate, planting and biodiversity measures. If the Local Planning Authority finds that the living roofs have not been delivered to the approved standards, the applicant shall rectify this to ensure it complies with the condition. The living roofs shall be retained thereafter for the lifetime of the development in accordance with the approved management arrangements.</p> <p>Reason: To ensure that the development provides the maximum provision towards the creation of habitats for biodiversity and supports the water retention on site during rainfall. In accordance with London Plan (2021) Policies G1, G5, G6, S11 and S12 and Local Plan (2017) Policies SP4, SP5, SP11 and SP13.</p> <p><u>Sustainability standards for non-residential unit</u></p> <p>(a) Within 6 months of commencement of above ground works, a BREEAM Pre-Assessment should be submitted to demonstrate what sustainability measures will be integrated within the commercial unit.</p> <p>(b) At least two months prior to the occupation of the commercial units, the employer requirements setting the sustainability requirements for the non-domestic units should be submitted to and approved by the planning authority. This should achieve the highest possible standard through measurable outputs to demonstrate how environmental sustainability has been integrated into the development, seeking to deliver as a minimum the credits as outlined in the BREEAM Pre-Assessment. These measures shall be maintained thereafter for the lifetime of the development.</p> <p>(c) Within six months after occupation, evidence of implementing the sustainability measures on site shall be submitted to the Local Planning Authority.</p>	

Stakeholder	Comment	Response
	<p><i>Reasons: 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</i></p> <p><u><i>Biodiversity Measures</i></u></p> <p><i>(a) Prior to the commencement of development, details of ecological enhancement measures and ecological protection measures shall be submitted to and approved in writing by the Council. This shall detail the biodiversity net gain, plans showing the proposed location of ecological enhancement measures, a sensitive lighting scheme, justification for the location and type of enhancement measures by a qualified ecologist, and how the development will support and protect local wildlife and natural habitats.</i></p> <p><i>(b) Prior to the occupation of development, photographic evidence and a post-development ecological field survey and impact assessment shall be submitted to and approved by the Local Planning Authority to demonstrate the delivery of the ecological enhancement and protection measures is in accordance with the approved measures and in accordance with CIEEM standards.</i></p> <p><i>Development shall accord with the details as approved and retained for the lifetime of the development.</i></p> <p><i>Reason: To ensure that the development provides the maximum provision towards the creation of habitats for biodiversity and the mitigation and adaptation of climate change. In accordance with London Plan (2021) Policies G1, G5, G6, SI1 and SI2 and Local Plan (2017) Policies SP4, SP5, SP11 and SP13.</i></p> <p><u><i>Urban Greening Factor</i></u></p> <p><i>Prior to completion of the construction work, an Urban Greening Factor calculation should be submitted to and approved by the Local Planning Authority demonstrating a target factor of 0.4 has been met through greening measures.</i></p> <p><i>Reason: To ensure that the development provides the maximum provision towards the urban greening of the local environment, creation of habitats for biodiversity and the mitigation and adaptation of climate change. In accordance with London Plan (2021) Policies G1, G5, G6, SI1 and SI2 and Local Plan (2017) Policies SP4, SP5, SP11 and SP13.</i></p> <p><u><i>Climate Change Adaptation</i></u></p> <p><i>Prior to the commencement of above ground works, submit annotated plans and details on what measures will be delivered to the external amenity areas that will help adapt the development and its occupants to the impacts of climate change through more frequent and extreme weather events and more prolonged droughts. It should also demonstrate further work has been undertaken to ensure that the climate adaptation and resilience strategy has responded to the London Climate Resilience Review, and any forthcoming action plans.</i></p>	

Stakeholder	Comment	Response
	<p><i>Reasons: In the interest of addressing climate change and securing sustainable development in accordance with London Plan (2021) Policies SI2, and SI7, and Local Plan (2017) Policies SP4 and DM21.</i></p> <p><u><i>Circular Economy</i></u> <i>Prior to the occupation of the development, a Post-Construction Monitoring Report should be completed in line with the GLA's Circular Economy Statement Guidance.</i></p> <p><i>The relevant Circular Economy Statement shall be submitted to the GLA at: circulareconomystatements@london.gov.uk, along with any supporting evidence as per the guidance. Confirmation of submission to the GLA shall be submitted to, and approved in writing by, the Local Planning Authority, prior to the occupation [of any phase / building/ development.</i></p> <p><i>Reason: In the interests of sustainable waste management and in order to maximise the re-use of materials in accordance with London Plan (2021) Policies D3, SI2 and SI7, and Local Plan (2017) Policies SP4, SP6, and DM21.</i></p> <p><u><i>Whole Life Carbon</i></u> <i>Prior to the occupation of each building, the post-construction tab of the GLA's Whole Life Carbon Assessment template should be completed in line with the GLA's Whole Life Carbon Assessment Guidance. The post-construction assessment should provide an update of the information submitted at planning submission stage. This should be submitted to the GLA at: ZeroCarbonPlanning@london.gov.uk, along with any supporting evidence as per the guidance. Confirmation of submission to the GLA shall be submitted to, and approved in writing by, the Local Planning Authority, prior to occupation of the relevant building.</i></p> <p><i>Reason: In the interests of sustainable development and to maximise on-site carbon dioxide savings in accordance with London Plan (2021) Policy SI2, and Local Plan (2017) Policies SP4 and DM21.</i></p> <p>Planning Obligations Heads of Terms</p> <ul style="list-style-type: none"> - Estimated carbon offset contribution (and associated obligations) of £53,900 (indicative), plus a 10% management fee; carbon offset contribution to be re-calculated at £2,850 per tCO2 at the Energy Plan and Sustainability stages. - Deferred offset contribution - DEN connection (and associated obligations) - Heating strategy fall-back option if not connecting to the DEN - Deferred offset contribution, if an alternative low-carbon heating strategy is implemented <p>Emailed comments sent 20/03/2025</p>	

Stakeholder	Comment	Response
	<p>Can you please add this extra condition? As this is only for council schemes to replace non-financial s106 obligations.</p> <p><u>Sustainability Review (condition)</u> <i>Prior to the occupation of the relevant building, an assessment should be provided to be approved in writing by the Council which shall include an as built detailed energy assessment of the Development prepared in accordance with London Plan and Council policies which:</i></p> <ul style="list-style-type: none"> <i>a. explains and provides evidence to demonstrate whether or not the Development has been constructed and completed in accordance with the Approved Energy Plan in particular whether the 100% CO2 emission reduction target has been met;</i> <i>b. explains and provides evidence to demonstrate whether or not the Development following Occupation complies with London Plan and Council policies;</i> <i>c. calculates and explains the amount of the Additional Carbon Offsetting Contribution (if any) to be paid by the Owners to the Council where the Development has not been constructed and completed in accordance with the Energy Plan;</i> <i>d. provides evidence to support (a) to (c) above including but not limited to photographic evidence, air tightness test certificates and as-built energy performance certificates; and</i> <i>e. such other information reasonably requested by the Council.</i> <p><i>Reason: To ensure the development reduces its impact on climate change by reducing carbon emissions on site in compliance with the Energy Hierarchy, and in line with London Plan (2021) Policy SI2, and Local Plan (2017) Policies SP4 and DM22.</i></p> <p>Can you please also replace the Energy Monitoring condition with the wording below? As this is only for council schemes to replace non-financial s106 obligations.</p> <p><u>Energy Monitoring</u> <i>(a) Prior to the completion of the superstructure a detailed scheme for energy monitoring has been submitted to and approved in writing by the Local Planning Authority. This shall include details of suitable automatic meter reading devices for the monitoring of energy use and renewable/low carbon energy generation. The monitoring mechanisms approved in the monitoring strategy shall be made available for use prior to the first occupation of each building.</i></p> <p><i>(b) Prior to each Building being occupied, the Owner shall provide updated accurate and verified 'as-built' design estimates of the 'Be Seen' energy performance indicators for each Reportable Unit of the development, as per the methodology outlined in the 'As-built stage' chapter / section of the GLA 'Be Seen' energy monitoring guidance.</i></p>	

Stakeholder	Comment	Response
	<p><i>(c) Within one year of first occupation, evidence shall be submitted to and approved by the Local Planning Authority to demonstrate how the development has performed against the approved Energy Strategy and to demonstrate how occupants have been taken through training on how to use their homes and the technology correctly and in the most energy efficient way and that issues have been dealt with. This should include energy use data for the first year and a brief statement of occupant involvement to evidence this training and engagement.</i></p> <p><i>(d) Upon completion of the first year of Occupation or following the end of the Defects Liability Period (whichever is the later) and at least for the following four years after that date, the Owner is required to provide accurate and verified annual in-use energy performance data for all relevant indicators under each Reportable Unit of the development as per the methodology outlined in the 'In-use stage' chapter / section of the GLA 'Be Seen' energy monitoring guidance document (or any document that may replace it).</i></p> <p><i>All data and supporting evidence should be submitted to the GLA using the 'Be Seen' reporting webform (https://www.london.gov.uk/what-wedo/planning/implementing-london-plan/london-plan-guidance-and-spgs/be-seen-energy-monitoring-guidance).) If the 'In-use stage' evidence shows that the 'As-built stage' performance estimates have not been or are not being met, the Owner should investigate and identify the causes of underperformance and the potential mitigation measures and set these out in the relevant comment box of the 'Be Seen' in-use stage reporting webform. An action plan comprising measures shall be submitted to and approved in writing by the GLA, identifying measures which would be reasonably practicable to implement and a proposed timescale for implementation. The action plan and measures approved by the GLA should be implemented by the Owner as soon as reasonably practicable.</i></p> <p><i>REASON: To ensure the development can comply with the Energy Hierarchy in line with London Plan 2021 Policy SI 2 and Local Plan Policy SP4 before construction works prohibit compliance.</i></p>	
Conservation Officer	<p>The proposed development at Selby road does not directly affect any heritage asset and does not raise any concern in term of indirect impact to heritage assets.</p> <p>There is no objection to this application from the heritage conservation stance.</p>	Noted.
Design Officer	<p><u>Site Location & Context</u></p> <p>The site is located In the north-east of the borough, and is for a project that crosses the border into Enfield, with the portion of the project on the Enfield side of the border treated as a separate planning application. The site comprises the existing "Selby Centre", a former secondary school converted into a community centre on the Haringey side of the border, along with "Bull Lane Playing Fields", a public open space on the Enfield side of the border. The existing former school buildings date from the</p>	Support noted.

Stakeholder	Comment	Response
	<p>1950s/60s and are of no townscape or architectural merit, whilst the open space is largely run down and overgrown.</p> <p>The proposals will refurbish the park to provide new sports pitches including a circular grass cricket pitch, gardens, childrens playspace, trees and other buffering vegetation, car and coach parking and a new Selby Centre community building. This is all in the London Borough of Enfield, so will not be commented on further here, save to say both appear to be of high quality design and will be of tremendous benefit to neighbouring and further afield residents of both boroughs. The former Selby Centre (originally school) buildings, in Haringey and therefore subject to this application, will all then be demolished and redeveloped for residential, save for the sports hall in the south-eastern corner of the site. This is considered to be of sufficiently good condition to be retained for now, as a cost saving, although outline planning permission is sought from Enfield for its intended future location in the park, with the intention, albeit not applied for in this permission, that when budgetary constraints allow this will relocate and be redeveloped for further housing. It is considered capable of being managed from the relocated Selby Centre, and does not impinge much on the proposed housing in this application.</p> <p>The site is surrounded by a mixture of generally low rise housing and industrial premises. The northern and western boundaries of the park are the back gardens of low rise, inter-war, "Homes for Heroes" Haringey council Weir Hall Estate (despite being in Enfield) that continues several blocks north and west. Its east side is the street known here as Bull Lane, which changes name to Queen Street where it crosses the border into Haringey. The street continues to the North Middlesex Hospital some 350m to the north and the North Circular 600m north, 300m south to White Hart Lane, with the Overground station 650m south-east. East of Bull Lane is industrial, as is the south side of the park, east of the existing Selby Centre that will become the new residential neighbourhood, including its immediate neighbour the "Booker" site recently granted planning permission for 3no. modern logistics units (HGY/2024/1203). The potential impact of <i>this application</i> on that and vice versa was considered at the time of that permission to be acceptable, as a back-to-back relationship, except that the logistics "estate" would open onto and present a more attractive frontage to the park to its north, when both are complete.</p> <p>To the south, south-east and south-west of the Selby Centre is a variety of inter and post war housing estates, including 1950s 3-storey flatted blocks east of Selby Road, continuing as two attractive crescents in Trafalgar and Allington Avenues to its east, 1980s flatted blocks on Dalbys Crescent tight to the south western corner of the Selby Centre, a further low rise, inter-war, cottage estate to its south west and the playing fields of Devonshire Hill Primary School immediately to its west, with the school buildings to its south. Beyond, across Weir Hall Road, The Weymarks are a pair of higher rise, seven storey, 1960s slab blocks. There is an established informal footpath from Weir Hall Road to the Selby Centre and park along the northern boundary of the school playing fields, with will be improved and regularised as part of this application.</p>	

Stakeholder	Comment	Response
	<p>The borough boundary runs along a slight ridge, with the land sloping gently to the north into the Edmonton area of Enfield and south to the Tottenham area of Haringey.</p> <p><u>Planning Policy Context</u></p> <p>The application site is Allocated in the adopted Site Allocations DPD (adopted June 2017) as “SA62: The Selby Centre”. The adopted Site Allocation is for “<i>Community use-led mixed use development including consolidation of community uses with potential housing development.</i>”. Site requirements include “<i>The future consolidated reprovion of all of the existing community uses should be secured before redevelopment can occur.</i>”</p> <p>••<i>Land should be restructured to make the best use of the land, with the potential for reprovion / enhancement of a community use taking account of existing uses.</i>”. There are no other nearby allocated sites in Haringey.</p> <p>Development Guidelines include “<i>There may be opportunities to link the open spaces in the area, specifically the Bull Lane and Weir Hall Road open spaces, to benefit wider areas of the Borough through the Green Grid network.</i>”.</p> <p>Other than the site allocation, no other planning designation apply.</p> <p><u>Streetscape Character & Pattern of Development</u></p> <p>The proposals are laid out in a simple street layout of exemplary clarity and usefulness. The existing Selby Road is to be extended through the site, up to the edge of the borough, providing an approach route to the new Selby Centre and park, which will also be accessible from Bull Lane. Pedestrians and cycles will be able to continue through the park, and refuse vehicles only will be able to pass through the service yard proposed for the rear of the Selby Centre building, but otherwise the new residential neighbourhood will remain a cul-de-sac for vehicles, whilst being better connected to more attractive through pedestrian and cycle routes.</p> <p>To provide a double sided street, with residential blocks on either side, Selby Road will “kink” slightly to the west on entering the new neighbourhood, whilst maintaining the possibility of through views to the new Selby Centre from further down the street. The kink is effected through an “entrance square”, animated by new residential blocks enclosing and looking onto it, with the primary “gateway” block closing the vista north up Selby Road containing a ground floor “corner shop” business unit to further animate the square; this is considered to resolve QRP concerns in their last report on this proposal.</p> <p>The primary street, continuation of Selby Road, then continues north, formally lined with elegant new residential blocks of consistent height and regularly spaced entrances, as well as street trees and landscaped pavements and parallel parking, to terminate in a park entrance square straddling the</p>	

Stakeholder	Comment	Response
	<p>borough boundary, overlooked and addressed by the main entrance to the new Selby Centre, new playspace in the park and the terminus of the improved path west to Weir Hall Road. The residential block on the west side turns to run alongside and face this path until it reaches the site boundary, enclosing that block's private communal centra court, and the block on the east side similarly turns east, facing and addressing the Selby Centre. Further south, this block turns to corm a C-shaped block in plan, with its southern wind facing a small street on the north side of the pavilion-like "gateway block" forming a route to the retained sports hall. The block on the western side of the main north-south street is E-shaped in plan, with a centra wing as well as a southern wind facing a secondary street running west from the entrance square, connecting to the end of Dalbys Crescent, a final L-shaped in plan block on the south side of this street resolves the complex relationship the proposed development has with Dalbys Crescent, with its north wing double sided onto this east-west street to its north and Dalbys Crescent's parking square to its south, while its easter wing being single sided facing Dalbys Crescent parking square and backing onto the Dalbys Crescent block that bridges the entrance to this 80s estate and has a back garden to back garden relationship to those houses north of the archway, in resolution of the QRP concern.</p> <p>Complex though some of the street and block relationships sound, especially where against Dalbys Crescent, the proposal is triumphant in resolving relationship with its neighbourhood and forming what should be an elegant, coherent, legible and logical relationship between residential blocks, public streets and squares and private gardens and courtyards. All public street and square frontages are animated by regularly spaced residential front doors and overlooked by residential windows, whilst all homes, even ground floor flats, are provided with appropriate levels of privacy to habitable rooms especially ground floor bedrooms. QRP concerns about legibility, character and quality of streets and spaces, relationship of blocks to existing neighbours, as well as landscaping, are considered to be very successfully met.</p> <p><u>Form, Bulk, Height, and Massing</u></p> <p>The proposals are for mansion blocks of remarkable consistency and quality of design. There are no longer any towers or blocks of over six storeys in the proposals, this being the consistent height proposed throughout the development (and for the entrance / south-western corner of the new Selby Centre), except where blocks step down to 5 and then 4 storeys to the west and south-west to be a more gentle, compatible neighbour to the school playing fields and existing 3 storey blocks in Dalbys Crescent. The QRP's concerns over the design of the towers is therefore no longer relevant.</p> <p>This consistency of height is nevertheless something of an increase over the prevailing one, two and three storey existing surroundings, but this is considered acceptable as the site is large enough to create its own context, there are buildings of seven storeys a short distance away (The Weymarks 200m to the west) and a little further, of over 20 storeys, closer to the centre of Tottenham (500m to the east). The development is intended to form a new local landmark and, in the case of the new Selby</p>	

Stakeholder	Comment	Response
	<p>Centre a new heart, which it would be appropriate to build up in height to, and the park, playing fields and Booker industrial/logistics site provide neighbours that are not harmed by these proposed blocks higher, yet still modest height, whilst the stepping down, and careful design mean it should be a good neighbour, not harming privacy and amenity, to the nearest residential neighbours in Dalbys Crescent.</p> <p>Despite being only of four, five and (generally) six storeys, the proposed blocks also have distinct base, middle and top, with engineering brick bases below ground floor cills and around entrance doors, and part recessed top floors in a lighter brick below raised cornices in stack-bonded brick.</p> <p><u>Elevational Treatment, Fenestration, Balconies, Materials & Detailing</u></p> <p>Any concern at monotony of these proposed consistent-height residential blocks is comprehensively avoided in elegant residential composition and detailing of the proposed blocks. Corners are marked with recessed balconies, generally with cycle stores on the ground floor providing subtle activity and animation, with the length of longer blocks broken up with further stacks of recessed balconies, establishing a rhythm of verticality. Communal entrances are recessed and celebrated in welcoming special materials, generally off the central green spine, clearly visible from the street and signposted, with the gateway block further embellished with a projecting pre-cast concrete canopy uniting with the shopfront, and with communal entrances leading to “joyful lobbies”; safe, welcoming and well-lit spaces with distinctive colour palettes to give individual identity.</p> <p>Ground floor flats and maisonettes wherever possible have their own front doors off the street, generally paired with immediate neighbours to add conviviality and reflect local precedent. “Deck access” dual aspect flats to the upper floors of most blocks are accessed off open access decks looking onto sociable private communal courtyards containing playspace and landscaping. The gateway block, in contrast, is a “point block”, with five flats per floor off a central internal core, and a 360°, outward facing character reflecting its more public location facing the entrance square and sports hall.</p> <p>Each block is further distinguished by being detailed in a different brick-based materials palette, with a different tone of primary brick to each block; a light buff to the gateway pavilion, richer red to the long block on the west side of the main street, and a darker buff to the shorter blocks on the east side and south west corner. In each case these are embellished and contrasted with consistent secondary materials and detailing, with pre-cast concrete cills, lintels, parapets, and balcony soffits and the lower half of their balustrades, light brick to recessed top floors and darker engineering brick to bases. Metal railings and balustrading are used consistently to the top part of balcony balustrades and to allow taller windows safely, allowing more elegant, vertically proportioned fenestration and more generous glazing, and ensuring balconies provide residents with privacy and hide their clutter whilst maintaining elegant proportions and good daylight access.</p> <p><u>Residential and Commercial Quality</u></p>	

Stakeholder	Comment	Response
	<p>All flat and room sizes comply with or exceed minima defined in the Nationally Described Space Standards, as is to be routinely expected, with flat layouts having been further refined since the last QRP to alleviate any concern at any flats being too cramped. Similarly, all residential units are provided with private amenity space in compliance with London Plan and Mayoral Housing SPG requirements.</p> <p>Considerable care has been taken in the layout of flats within blocks and in the layout of flats themselves to multiple aspect flats whilst preserving privacy to the proposed dwellings and existing neighbours. Where windows directly face neighbouring dwellings, they are never the only windows to those habitable rooms, so they do not overlook or are overlooked by neighbouring dwellings but get higher ventilation and a view of the sky. All flats are at least dual aspect, even those in the point block where that would normally not be possible, thanks to the double south-west corner over its entrance; indeed in other blocks, several flats are triple aspect. Whilst there are north-south oriented blocks, the majority are the optimal east-west orientation, evidence the QRP concern in this respect has also been allayed.</p> <p>As noted above, all flats benefit from private outdoor amenity space in the form of private gardens or balconies, as well as a shared communal courtyard / street containing childrens play space and seating, as well as pleasant, car-free, short walking access to nearby public parks and amenities including of course the new park and Selby Centre. Overall, for a relatively high density, yet relatively low-rise development in a tightly constrained site surrounded by neighbours, the proposal is a truly impressive achievement for residential quality.</p> <p><u>Daylight & Sunlight</u></p> <p>Of relevance to this section, Haringey policy in the DM DPD DM1 requires that:</p> <p><i>“...D Development proposals must ensure a high standard of privacy and amenity for the development’s users and neighbours. The council will support proposals that:</i></p> <ol style="list-style-type: none"> <i>Provide appropriate sunlight, daylight and open aspects (including private amenity spaces where required) to all parts of the development and adjacent buildings and land;</i> <i>Provide an appropriate amount of privacy to their residents and neighbouring properties to avoid overlooking and loss of privacy detrimental to the amenity of neighbouring residents and residents of the development...”</i> <p>The applicants provided Daylight and Sunlight Report on their proposals and of the effect of their proposals on neighbouring dwellings and the day and sunlight levels achieved in the proposed development. These have been prepared fully in accordance with council policy following the methods explained in the Building Research Establishment’s publication “Site Layout Planning for Daylight and Sunlight – A Guide to Good Practice” (3rd Edition, Littlefair, 2022), known as “The BRE Guide”.</p>	

Stakeholder	Comment	Response
	<p>The assessment finds that the day and sunlight received by all neighbouring properties would spectacularly meet the BRE recommended guidance. Of the 330 neighbouring residential windows tested, only 3 fail to meet the BRE Guide recommendations, and those three only by very narrow margins, the proposed office space in the recent planning permission for the Booker site would continue to receive good daylight levels, and all neighbouring outdoor amenity spaces would continue to receive excellent access to sunlight over the BRE Guide recommendations.</p> <p>The applicants' assessment also finds the habitable rooms in the proposals would achieve very good levels of day and sunlight at or above the BRE Guide recommended levels, with the majority of the proposed habitable rooms tested achieving the full BRE recommendations, and those that do not generally being on the ground floor and obstructed by landscape features or overshadowed by balconies above. In such cases it is considered a reasonable achievement, given that such rooms would benefit from ready access to outdoor amenity space receiving good levels of day and sunlight. All of the proposed communal amenity space / play space within the centre of the development would also receive plentiful sunlight as defined in the BRE Guide.</p> <p>As in the case of other higher density developments, it can be noted that the BRE Guide itself states that it is written with low density, suburban patterns of development in mind and should not be slavishly applied to more urban locations; as in London, the Mayor of London's Housing SPG acknowledges. Therefore, full or near full compliance with the BRE Guide is not to be expected, albeit that a high level of day and sunlight performance, close to the full BRE Guide recommendations, is convincingly predicted to be achieved.</p> <p><u>Conclusions</u></p> <p>The proposed "Selby Urban Village" development would create a new residential heart to an emerging neighbourhood adjacent to new excellent community sport and outdoor recreation facilities. The proposed new housing should be of very high quality, to very high standards, and in a very elegant, well composed, attractive, durable and robust series of residential blocks set in a series of legible, attractive and pedestrian friendly new and extended streets that will connect well and seamlessly integrate into their surrounding existing neighbourhood.</p> <p>The proposals have been enthusiastically welcomed by the Council's Quality Review Panel, and all their outstanding concerns at their last review have been comprehensively alleviated.</p>	
Drainage / Lead Local Flood Authority (LLFA)	Having reviewed the applicant's submitted Flood Risk Assessment and SuDS strategy report document reference number 20049-LHE-ZZ-XX-RP-C-01 Revision P2 dated 13 th September 2024 as prepared by Lewis Hubbard Engineering Consultant,	Conditions recommended.

Stakeholder	Comment	Response
	<p><u>Surface Water Drainage condition</u></p> <p>No development shall take place until a detailed Surface Water Drainage scheme for site has been submitted and approved in writing by the Local Planning Authority. The detailed drainage scheme shall demonstrate:</p> <ul style="list-style-type: none"> a. Detailed calculations including the Network Diagram cross referencing all the drainage elements and confirming a full range of rainfall data for each return period for 7 days 24 hours 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. b. The Causeway Calculations output submitted by the applicant for the combined catchment areas A1 and A4, covering a 1-in-100-year event plus climate change allowance, indicates a significant level of flooding. Given the site's location and extent of impermeable surfaces, this level of flooding is unacceptable. Therefore, appropriate mitigation measures must be implemented at the site. All flooding or exceedance routes should be carefully managed on-site, ensuring that any floodwater is directed towards designated areas that are safe for flooding, and kept clear of sensitive infrastructure or buildings. <p>Reason : To endure that the principles of Sustainable Drainage are incorporated into this proposal and maintained thereafter</p> <p><u>Management and Maintenance condition</u></p> <p>Prior to occupation of the development hereby approved, a detailed management maintenance plan for the lifetime of the development, which shall include arrangements for adoption by an appropriate public body or statutory undertaker, management by Residents management company or other arrangements to secure the operation of the drainage scheme throughout the lifetime of the development. The Management Maintenance Schedule shall be constructed in accordance with the approved details and thereafter retained.</p> <p>Reason: To prevent increased risk of flooding to improve water quality and amenity to ensure future maintenance of the surface water drainage system</p>	
Education	<p>We have a surplus of school places in the local area, long-term falls in birth rates and less than 40% of the development is 3-4 bed so I think we'll be fine from a school place planning perspective.</p>	Noted.

Stakeholder	Comment	Response
Employment And Skills	<p>Please find the S106 requirements below.</p> <ul style="list-style-type: none"> • Produce an submit an Employment and Skills Plan (ESP), including project and local histogram to be approved by the Council at least 20 Working Days prior to commencement. • Local labour – 20% of the peak workforce. <i>Local is typically defined as Haringey only but to align with Enfield requirements, I suggest we define it as Haringey and Enfield only . This removes Enfield’s flexibility of accepting neighbouring boroughs. We can be more flexible at the delivery stage, but I think the agreements should be as per my suggestion to ensure our residents are the primary beneficiaries.</i> • Apprenticeship – 1 (one) apprentice per £3million Development Cost, including an apprenticeship support fee of £1,500 • Skills Training – 25% of the local labour target • STEM and career education workshops – a minimum of 5 sessions and the format of such sessions to be agreed with the Assigned Officer • Work Placement – the target is based on the construction cost and is agreed at the ESP stage. • Work Experience – the target is based on construction cost and is agreed at the ESP stage. • Local Procurement – not less than ten percent (10%) of the total construction spend on goods, product and services during the Construction Phase is spent with Local SME’s. • Local Supply Support – the provision of at least 1 (one) meet the buyer event and/or 1 (one) supplier engagement activity. • Submission of monthly monitoring reports, including evidence and quarterly performance review meetings • Inclusion of ESP in tendering documents <p>Please note that there is typically a financial skills contribution as well as financial compensation for non-delivery.</p>	Obligations recommended.
Environmental Health - Noise	[Having reviewed the submitted Noise and Vibration Assessment the Noise & Nuisance Officer made the following comment] - Looks a standard assessment. And I agree with the findings.	Noise and Vibration Assessment conditioned.
Health in All Policies Officer (Public Health)	<p>The Public Health team have read through the Design and Action Statement, Health Impact Assessment, Equalities Impact Assessment and relevant drawings. We would like to acknowledge the work that has gone into this major application to address health inequalities, and the application recognises the relationship between planning and health and wellbeing, mitigating against potential health harming development.</p> <p>We welcome a scheme that delivers high quality, affordable housing with access to green and blue space, and sustainable transport options.</p> <p>Positive aspects of the scheme:</p>	Noted.

Stakeholder	Comment	Response
	<ul style="list-style-type: none"> • The inclusion of food-growing spaces will promote access to healthier and more affordable foods, promoting healthier lifestyles. • The development will contribute to local job creation, which has positive economic and social impacts for the community. • The provision of 590 new Council homes will increase housing availability and help address local housing needs. • The planned upgrade of childcare facilities offers support for parents/ carers whilst strengthening development opportunities for children. • HIA <p>Key considerations:</p> <ol style="list-style-type: none"> 1. Updated obesity figures are available through the Fingertips data platform. Ensure these are referenced to provide the most current information on local obesity rates and trends. (https://fingertips.phe.org.uk/profile/national-child-measurement-programme) 2. The pond adds significant aesthetic value to the development, but it's important to assess whether it is safe for children and young people. It would be useful to clarify what measures are in place to ensure the safety of children around this area. 3. Developers should be made aware of the risks related to suicide prevention in high-rise buildings. Are there any design features (e.g., barriers, safe spaces) that mitigate this risk? 4. Review the potential health impacts of artificial turf, particularly regarding toxicity, as highlighted in studies (Health impacts of artificial turf: Toxicity studies, challenges, and future directions - PubMed). Ensure the developers have considered these impacts in their design and maintenance plans. 5. Ensure there is a detailed accessibility report, which should cover physical and sensory access for all residents, including those with mobility challenges or neurodivergent conditions. 6. Ensure that street lighting is not overly bright, as excessive lighting can disrupt sleep patterns, especially in homes of children, neurodivergent individuals, and people with mental health concerns. Consider the impact of light pollution on residents. 7. The Health Impact Assessment (HIA) should take into account a broader range of climate change determinants, beyond just energy use. Consider the effects of factors such as flooding, heatwaves, and environmental sustainability on public health. 8. Although the HIA acknowledges single-parent families as a vulnerable group with a specific need, throughout the document this is not referenced or addressed. This is an important demographic to consider, particularly in terms of access to childcare, housing affordability, and support services. 	
Lighting	<p>I assume Haringey will be maintaining the lighting on this development, if so all lighting will need to be 4000K not 3000k and controlled by our central management system and equipment should comply with our specification.</p> <p>The public footpaths should be illuminated to P1 and roads to P2</p>	<p>The applicant has confirmed that everything is available in 4000k lighting would</p>

Stakeholder	Comment	Response
	<p>We do use bollard lighting or Kingfisher floodlights; all we do not use wall mounted lighting units to illuminate public highway or footpaths.</p>	<p>be used for the residential area.</p> <p>All products are also Digital Addressable Lighting Interface (DALI) and so should be compatible with the central system.</p> <p>The public footpaths would be illuminated to P1 and roads to P2 with the exception of the footpaths running along the residential roads.</p> <p>The residential area uses bollard lighting or Kingfisher floodlights. Wall mounted lighting is only to be used in the park area on the back and sides of the Selby building and changing pavilion.</p>
<p>Pollution / Air Quality / Contaminated Land</p>	<p>Having considered the applicant submitted information including: Design and Access Statement with reference 472-KCA-XX-XX-RP-A-0700-DAS, prepared by Karakusevic Carson Architects, dated September 2024; Phase 2 GeoEnvironmental Ground Investigation with reference 22/34764, prepared by Site Analytical Services Ltd., dated March 2022, taking note of section 3 (Site Details), 4 (Scope of Work) and 5 (Contamination Testing); Air Quality Assessment prepared by XCO2, dated September 2024 taking note of section 4 (Methodology), 5 (Baseline Air Quality and Exposure Assessment), 6 (Potential Impacts and Exposure), 7 (Air Quality Neutral Assessment), 8 (Mitigation), 9 (summary and Conclusions), Appenxdix A-D; Energy Statement prepared by XCO2, dated October 2024 taking note of the proposal to connect the development to the Meridian Heat Network and install PV panels with a contingency temporary boiler strategy if connection to the heat network is not available when required; please be advised that we have no objections to the proposed development in respect to air</p>	<p>Conditions included.</p>

Stakeholder	Comment	Response
	<p>quality and land contamination but the following planning conditions and informative are recommended should planning permission be granted.</p> <p>1. <u>Land Contamination</u> Before development commences other than for investigative work:</p> <ol style="list-style-type: none"> A desktop study shall be carried out which shall include the identification of previous uses, potential contaminants that might be expected, given those uses, and other relevant information. Using this information, a diagrammatical representation (Conceptual Model) for the site of all potential contaminant sources, pathways and receptors shall be produced. The desktop study and Conceptual Model shall be submitted to the Local Planning Authority. If the desktop study and Conceptual Model indicate no risk of harm, development shall not commence until approved in writing by the Local Planning Authority. If the desktop study and Conceptual Model indicate any risk of harm, a site investigation shall be designed for the site using information obtained from the desktop study and Conceptual Model. The site investigation must be comprehensive enough to enable; a risk assessment to be undertaken, refinement of the Conceptual Model, and the development of a Method Statement detailing the remediation requirements. The risk assessment and refined Conceptual Model shall be submitted, along with the site investigation report, to the Local Planning Authority which shall be submitted to, and approved in writing by, the Local Planning Authority prior to that remediation being carried out on site. Where remediation of contamination on the site is required, completion of the remediation detailed in the method statement shall be carried out and a report that provides verification that the required works have been carried out, shall be submitted to, and approved in writing by the Local Planning Authority before the development is occupied. <p><u>Reason:</u> To ensure the development can be implemented and occupied with adequate regard for environmental and public safety.</p> <p>2. <u>Unexpected Contamination</u> If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until a remediation strategy detailing how this contamination will be dealt with has been submitted to and approved in writing by the Local Planning Authority. The remediation strategy shall be implemented as approved.</p>	

Stakeholder	Comment	Response
	<p><u>Reasons:</u> To ensure that the development is not put at unacceptable risk from, or adversely affected by, unacceptable levels water pollution from previously unidentified contamination sources at the development site in line with paragraph 109 of the National Planning Policy Framework.</p> <p>3. <u>NRMM</u></p> <ul style="list-style-type: none"> a) Prior to the commencement of the development, evidence of site registration at http://nrmm.london/ to allow continuing details of Non-Road Mobile Machinery (NRMM) and plant of net power between 37kW and 560 kW to be uploaded during the construction phase of the development shall be submitted to and approved by the Local Planning Authority. b) Evidence that all plant and machinery to be used during the demolition and construction phases of the development shall meets Stage IIIA of EU Directive 97/68/ EC for both NOx and PM emissions shall be submitted to the Local Planning Authority. c) During the course of the demolitions, site preparation and construction phases, an inventory and emissions records for all Non-Road Mobile Machinery (NRMM) shall be kept on site. The inventory shall demonstrate that all NRMM is regularly serviced and detail proof of emission limits for all equipment. All documentation shall be made available for inspection by Local Authority officers at all times until the completion of the development. <p><u>Reason:</u> To protect local air quality and comply with Policy 7.14 of the London Plan and the GLA NRMM LEZ.</p> <p>4. <u>Management and Control of Dust</u></p> <p>While we take note of the Dust Management Plan outlined in Air Quality Assessment prepared by XCO2, dated September 2024, no works shall be carried out on the site until the specific locations of PM10 dust monitors and how these results will be made available to the Pollution for ongoing assessment has been submitted to and approved in writing by the Local Planning Authority. The works shall be carried out in accordance with the approved details thereafter.</p> <p><u>Reasons:</u> To Comply with Policy 7.14 of the London Plan and GLA SPG Dust and Emissions Control (2014).</p> <p>5. <u>Considerate Constructors Scheme</u></p> <p>Prior to the commencement of any works the site or Contractor Company must register with the Considerate Constructors Scheme. Proof of registration must be submitted to and approved in writing by the Local Planning Authority. Registration shall be maintained throughout construction.</p> <p><u>Reason:</u> To Comply with Policy 7.14 of the London Plan.</p> <p>6. <u>Combustion and Energy Plant</u></p>	

Stakeholder	Comment	Response
	<p>Where the temporary boiler strategy is implemented, prior to installation, details of the gas boilers to be provided for space heating and domestic hot water shall be submitted to and approved in writing by the Local Planning Authority. The boilers to be provided for space heating and domestic hot water shall have dry NOx emissions not exceeding 40 mg/kWh (0%). The development shall be carried out in accordance with the approved details thereafter.</p> <p><u>Reason:</u> To prevent an increase in local problems with air quality within an Air Quality Management Area (AQMA) as required by The London Plan Policy SI 1.</p> <p><u>Informative:</u></p> <ol style="list-style-type: none"> 1. Prior to refurbishment or any construction work of the existing buildings, an asbestos survey should be carried out to identify the location and type of asbestos containing materials. Any asbestos containing materials must be removed and disposed of in accordance with the correct procedure prior to any demolition or construction works carried out. 	
Transportation	<p>Transportation Planning Comments</p> <p>HGY/2024/2851, Community Centre, Selby Centre, Selby Road, Tottenham, London, N17 8JL</p> <p>Date: 24/02/2025</p> <p>Proposal: Demolition of all existing buildings comprising Selby Centre and the erection of four buildings. New buildings to comprise of residential accommodation (Use Class C3); and ancillary commercial accommodation (Use Class E (a), (b), & (g)). With car and cycle parking; new vehicle, pedestrian, and cycle routes; new public, communal, and private amenity space, and landscaping; and all associated plant and servicing infrastructure.</p> <p>Description An application has been received seeking planning permission to demolish the existing structures within the current Selby Centre and erect four new buildings. The new building will be comprised of new residential units (Use Class C3) and an ancillary commercial unit (Use Class E (a), (b), & (g)). Car and cycle parking will be provided, along with new pedestrian and cycle routes through the site.</p> <p>The site is currently used by the Selby Centre who provide a hub for the local community. It offers services such as an indoor sports hall, offices, community hall, education, and a</p>	Conditions and heads of terms included where reasonable and necessary.

Stakeholder	Comment	Response
	<p>restaurant. The site employs 152 fulltime and 167 part-time staff. The centre has a car park which has capacity for 143 spaces and is only accessed from Selby Road. The Selby Centre would be relocated inside the London Borough of Enfield and would have parking for 50 general spaces, 10 disabled bays and 2 minibus spaces.</p> <p>The proposal includes a commercial unit that is envisaged to be used as a supermarket and to build 202 new residential units. The applicant is proposing to provide a total of 21 disabled car parking spaces with electric vehicle charging points to support the residential aspect of the development. Further parking would be provided in the form of 2 blue badge bays for the sports centre. Provision would be made for 382 long-stay and 7 short-stay cycle parking.</p> <p>The proposal site has a PTAL rating of 2 as stated on Transport for London's WebCAT tool, this indicates that its access to public transport is poor when compared to London as a whole suggesting that there will be a strong reliance on vehicular trips to access the site. A manual PTAL calculation was undertaken by the applicant's transport consultants which concluded that based on the public transport service and distance from the site the PTAL of the site is 3 which is medium.</p> <p>The site is located within the Tottenham Event Day CPZ which is only in operation when there is a major event at the stadium. Therefore, currently there are no parking controls in operation to restrict any potential parking demand generated by the development proposal.</p> <p>The main entrance to the site will be from Selby Road which forms part of Haringey Councils adopted highways network. Selby Road and the surrounding residential streets have a speed limit of 20mph. The carriageway on Selby Road has a width of around 3.6m where there is on-street parking on both sides of the road. It should be noted that this site and the adjacent Bull Lane Sport Centre application are in close proximity to the Bull Lane bus gate which is enforced by a camera and restricts access north of the site to the A406 to buses only.</p> <p>The development is located near to the A1010 High Road that provides future residents with convenient access to shops, services, and transport links. The nearest station to the site is White Hart Lane Overground Station, it is around a 11min walk and a 2min bike ride from the development. Residents will have access to some bus services, nearby bus stops are served by the W3 which is a high frequency route traversing from west to east of the borough and the 318 that provides a vital service to North Middlesex University Hospital.</p>	

Stakeholder	Comment	Response
	<p>Unit mix Proposed: 44 x 1 bedroom, 79 x 2-bedroom, 67 x 3 bedroom, and 12 x 4 bedrooms dwellings.</p> <p>Commercial floor space Proposed: 91 sqm</p> <p>Trip generation Trip information for the proposed development was generated based upon sites from the TRICS database. The tip generation data is based on 3 sites within London which are local authority, affordable housing developments. Only one of these sites has a similar PTAL to the site (PTAL 3) with the other sites have PTAL of 5 and 6A.</p> <p>The current site trip information has been based on following uses: sports hall, community centre, and offices. Many of the sites used to forecast the existing facility trip generation are not located within London and so trip information will be very much different based upon connection to public transport and surrounding road networks.</p> <p>Existing two-way trips:</p> <ul style="list-style-type: none"> • Pedestrian: 196 • Cyclists: 36 • Public transport: 873 • Vehicle: 678 <p>The proposed multi-modal trip information has been rebalanced within the TA to reduce car and passenger trips in line with the sites car parking provision based on bus and rail trip from the 2011 census data. It should be noted that the proposal is likely to generate a higher number of car trips compared to the forecasted number of 28 vehicular trips due to the lack of any mechanisms to restrict the over spill of parking into the local area.</p> <p>Proposed two-way trips:</p> <ul style="list-style-type: none"> • Pedestrians: 790 • Cyclists: 28 • Public transport: 528 • Vehicle: 99 <p>Overall, the above data demonstrates that the new development will make impacts on decreasing the number of vehicles to/from the site, but this would be down to the overall number of car parking spaces being limited to only 21 disabled bays and 2 disabled bays</p>	

Stakeholder	Comment	Response
	<p>associated with the moved Selby Centre. But the number of pedestrian movements will be significantly increased as result of the redistributed trips from the site. additionally, any public transport trip may include walking trip given that residents will need to reach local bus stops and station by foot.</p> <p>Car parking Planning policy requires that applications for planning permission be determined in accordance with the development plan unless material considerations indicate otherwise. The published London Plan 2021 Policy T6.1 Residential Parking requires that development proposals must comply with the relevant parking standards. For a development of this type, a 44 x 1 bedroom, 79 x 2-bedroom, 67 x 3 bedroom, and 12 x 4 bedrooms dwellings with a PTAL rating of 3. Maximum parking standards apply which limits the number of car parking spaces that can be provided for a development of this nature which has a medium PTAL.</p> <p>Given the Medium PTAL of the site and its proximity to White Hart Lane train station and the W3 and 41 bus routes, the development will be designated as car capped development meaning the onsite car parking must be in accordance with Haringey's Development Management DPD, Policy DM32 which states the council will support proposals for new developments with limited or no on-site parking, where:</p> <ul style="list-style-type: none"> • There are alternative and accessible means of transport available. • Public transport accessibility is at least 4 as defined in the Public Transport Accessibility Index. • A Controlled Parking Zone (CPZ) exists or will be provided prior to the occupation of the development. • Parking is provided for wheelchair accessible units. <p>In order for the above site to fully accord with the development management policies, additional parking restrictions are required in the form of changes to the existing CPZ proposal from an event day only CPZ to an all week CPZ and additional restriction in any tenancy or lease to restrict occupiers (tenants and residents) from applying for any on-street car parking permit. The applicant/developer has agreed that they would be open to signing up to a S106 obligation to make the development Car-Capped.</p> <p>In line with DM32 and the published London Plan 2021 T6.1, disabled person's parking should be provided for new residential developments delivering 10 or more units. As a minimum 3% of dwellings must have at least 1 designated disabled persons parking bay from the outset. This</p>	

Stakeholder	Comment	Response
	<p>Policy further requires that new developments be able to demonstrate as part of a Parking Design and Management Plan, how an additional 7% of dwellings could be provided with 1 designated disabled person's parking space per dwelling in future upon request as soon as the existing provision is insufficient.</p> <p>As part of our ongoing effort to ensure that this policy can be complied with LBH Transport Planning would require that, the applicant demonstrate from the outset that the full 10% of wheelchair accessible space can provided from the onset. The applicant has demonstrated that the development proposal will be able to provide the required number of 21 accessible parking spaces. All accessible bays associated with the development must be for resident use only, leased not sold, and be designated according to the design guidance BS8300vol.1. Finally, all submitted plans received will need to demonstrate and show the correct dimensions for the bays, which includes the 1.2m hatched area for bays which current plans do not display.</p> <p>The site would include workspace/commercial floorspace with an area of 91 sqm, though the number of potential employees is not known. To be in accordance with the published London Plan 2021 Policy T6.5 Non-residential disabled person parking, which states that '<i>all proposals should include an appropriate amount of Blue Badge parking, providing at least one space even if no general parking is provided</i>'. Consequently, given the relatively small size of both the commercial units and its possible uses it is felt in this instance that they would not generate enough demand to justify the provision of a dedicated disabled bay.</p> <p>Two disabled bays within this application site would be created and for the sole use of the Sports Hall located in the London Borough of Haringey. Given that this could generate events and is outside the use of the residential element LBH Transport Planning will require a planning condition for the submission of an Event Management Plan which will help the council better understand how the bays will be used, reduce the impact on neighbouring residential streets and help support the use of sustainable forms of transport.</p> <p>Future parking demand</p> <p>A parking survey was conducted in September 2023, which utilised the Lambeth Methodology covering an area of 200m, and utilised 5m bay widths. Surveys were conducted over 5 days in total and were done either in the morning or later in the afternoon/evening.</p> <p>The developer/applicant has sent over further information which demonstrates that in worst case scenario the 202 dwellings could generate demand for up to 55 new parking spaces.</p>	

Stakeholder	Comment	Response
	<p>The survey conducted during the day demonstrated parking stress to be between 53% to 57%, with the levels in the evening being recorded at 54%. Additionally, there is 273 space spaces located within a 200m radius of the site. In all, the above levels show that there is sufficient on-street capacity to accommodate an increase in some parking from the development.</p> <p>Selby and Sport Centre include the reprovion 50 general spaces, 10 disabled bays, the existing car park has capacity for up to 123 spaces. The provision is a reduction when compared to the existing, in addition no assessment has been presented on how this reduction may impact on the local highway network.</p> <p>As above whilst we support a car-capped development and encourage the reduction in car parking demand to encourage the uptake of more sustainable modes of transport. For the development proposal to be in accordance with these policies, LBH Transport Planning requires a contribution towards parking management measures to ensure that the surrounding residential streets are not negatively affected by parking displacement generated by the proposal.</p> <p>Electric vehicle charging Policy T6.1 Residential Parking requires that '<i>20 per cent of spaces should have active charging facilities, with passive provision for all remaining spaces</i>'. The applicant will be providing EV charging in line with the London Plan.</p> <p>The published London Plan 2021 does not contain any specific guidance on the provision of electric charging points for community and sports hall. However, Haringey Council's Development Management DPD, Chapter 5 Transport & Parking 5.5 states that '<i>the Council also supports the provision of electric charging points in new developments with the aim of encouraging greater use of electric vehicles</i>'. Therefore, LBH Transport Planning would require that full provision of active charging points is provided from onset for the Selby Centre and Sports hall disabled parking spaces in an endeavour to maximise the support of electric vehicles travelling to/from site in the future. The above issues will be addressed via a pre-commencement planning condition.</p> <p>Cycle parking The sites total proposed cycle parking for both elements of the site were assessed against the published London Plan 2021 Policy T5 Cycle parking standards for compliance. Policy T5</p>	

Stakeholder	Comment	Response
	<p>Cycle requires that developments <i>'provide the provision of appropriate levels of cycle parking which should be fit for purpose, secure and well-located and be in accordance with the minimum standards</i>. Residential is as follows: 1 space per 1 bedroom dwelling, 1.5 spaces 2-person 1 bedroom, 2 spaces per all other dwellings long-stay, and short-stay 5 to 40 dwellings: 2 spaces and thereafter 1 space per 40 dwellings. The residential use proposes to make provision for 382 long-stay cycle parking and 7 short-stay cycle parking, the commercial unit has none proposed. Given the size of the commercial unit, cycle parking will be required in line with the London Plan 2021.</p> <p>Cycle parking will be provided via mixture of enlarged accessible stands, tow-tier, and Sheffield Stands. Currently no dimensions have been supplied which at this stage would allow for them to be compared with the guidance within the London Cycle Design Standards (LCDS).</p> <p>The location of the proposed long-stay spaces has been given, it will see cycle parking being located within multiple locations including inside homes, independent bike stores, and block stores. Furthermore, all long-stay bike stores have a single access into them, though the means of access are not currently known. The development meets the requirement for all new developments to have 5% of its cycle parking enlarged to accommodate larger adapted cycles within the LCDS. The short-stay cycle parking will be located across 6 areas and visitors will be able to lock their bikes against Sheffield stands, 6 stands are located adjacent to the Sport Halls.</p> <p>Details relating to the bike store will be secured by a pre-commencement planning condition requiring the applicant to submit details and plans of cycle parking spaces in line with the London Plan 2021 Policy T5 Cycle and Transport for London's London Cycle Design Standards (LCDS) which must be submitted and approved before development commences on-site.</p> <p>Access An Active Travel Zone (ATZ) has been produced and submitted as part of the Transport Assessment. 6 walking routes to key destinations were analysed and assessed against the Healthy Streets indicators. All walking routes started from the Enfield application site location, rather than the site main entrance on Selby Road for this application. These routes were:</p> <ul style="list-style-type: none"> • Route 1: Enfield site to North Middlesex University Hospital via Bull Lane • Route 2: Enfield site to White Hart Lane Overground Station via Haringey Sixth • Route 3: Enfield site to Tottenham Town Centre 	

Stakeholder	Comment	Response
	<ul style="list-style-type: none"> • Route 4: Enfield site to The Devonshire Hill Nursery and Primary School • Route 5: Enfield site to Duke Aldridge Academy • Route 6: Enfield site to Northumberland Park Railway Station <p>Some of the recommendations for improvements to these routes include the installation of a dropped kerb, extra lighting, footway resurfacing on White Hart Lane, new formal crossing near to the college, promotion of active travel with the college, widening of footways, improved landscaping and hedge removal, and new seating.</p> <p>LBH Transport Planning have sourced collision data that has been sourced from Transport for London (TfL). It covers a period from January 2017 – September 2024. Pedestrians and cyclists are the only modes of transport, and all casualty types included.</p> <p>The following has been observed near to the site:</p> <ul style="list-style-type: none"> • Junction/roundabout with White Hart Lane and Creighton Road south-west of the site 3 slight collisions. • White Hart Lane 3 slight collisions. • Creighton Road 1 serious and 3 slight collisions. <p>As the above ATZ routes have not assessed any walking routes to the west of the site including the main access on Selby Road. LBH Transport Planning will require as part of the scope of a S.278 agreement for footways on Selby Road to be resurfaced given that the site will generate 790- trips by foot from the site, which is a significant increase from the present usage, and as this will be the primary access it stands to reason that many will use it.</p> <p>Highways works.</p> <p>The development will include some changes to the adopted highway on Selby Road. These works include removal of existing vehicles access, new footways, new highway realignment, car club bay, removal of on-street resident bays on Selby Road, and new vehicular accesses. The application did include a proposal within the Transport Assessment for part of Selby Road to be stopped up via a s247 of the Town and Country Planning Act 1990. However, as the land is not being directly developed on a stopping up order will not be needed, but rather a S.278 agreement instead. The realignment to the highway on Selby Road would remove the existing turning head, however as there are existing residents on Selby Road this turning head is more than likely used for larger vehicles to turn round without becoming stuck. Subsequently, it</p>	

Stakeholder	Comment	Response
	<p>cannot be removed, and the plans will need to be updated to reflect this. The development would also look to create a new walking and cycling route through the site connecting from Bull Lane in the east to Weir Hall Road in the west. This new route will require the creation of a new access on Weir Hall Road. Changes are also being made to Dalby's Crescent estate; this includes road layout changes and reconfiguration/reallocation of parking for existing residents. As Dalby's Crescent is not an adopted highway but rather housing land it cannot be considered within any subsequent S.278 agreement.</p> <p>LBH Transport Planning would require a stage 1 and 2 Road Safety Audit to be completed during the design stage of any potential S.278 works. These works would be subject to further detailed design and approval and will have to be secured as part of a S.278 agreement between the council and applicant.</p> <p>Service and Delivery</p> <p>A draft service and delivery plan was submitted with the application which concluded that the scheme would generate 59 two-way movement for LGVs and 6 two-way HGV trips, this has been based upon comparable TRICs sites within London within similar sizes to this site over a 13-hour period. The existing servicing trips have been provided which show that there are only 16 LGV two-way trips over a 12-hour period, subsequently demonstrating that this site is producing a significantly higher number of trips on the local highway and on the site itself. It should be highlighted that the service and delivery plan does not mention the commercial unit and how it will be effectively serviced in order to prevent it from interfering with the normal operation of the residential element. Nor is any trip information and the location of where it would be served been provided. The above trip generation for the residential component could be higher as there has been a growth in online shopping since covid 19 this number may grow or see increases at different stages of the day.</p> <p>No proposal has been given on how the development will help to mitigate or control how deliveries are being made to residents nor the commercial unit. Swept path drawings have been sent through only showing how a 7.2m panel van using the turning head at the northern end of the development can leave in a forward gear. Drawings have been sent showing how a 7.2m panel van stopping and unloading at specific bays within the development road, although it is not clear how these bays will be distinguished from other existing bays through either material or markings.</p>	

Stakeholder	Comment	Response
	<p>Refuse vehicles should be able collect from the bin stores without the council operatives travelling further than 10m. The vehicles will travel north through the development to the turning head where bollards will be dropped for them to proceed to the relocated Selby Centre and Sport Centre in one direction.</p> <p>We will require a revised Service and Delivery Plan to manage deliveries accessing the site and to limit the number of trips to the site to manage the impact on the highway network, in accordance with the published London Plan 2021 Policy T7 Deliveries, servicing, and construction.</p> <p>Travel Plan A draft Travel Plan has been received only covering the sites residential use. Adjusted data from the 2011 census has been used to demonstrate the resident's mode of transport split over a 12-hour period and during the AM/PM peaks. LBH Transport Planning recommend that the 2021 census data be used in the analysis to establish mode split for developments given that the data is much more recent than the legacy data within the 2011 census. For simplicity the 12-hour data will be assessed which demonstrates the following two-way trips:</p> <ul style="list-style-type: none"> • Pedestrians: 790 • Cyclists: 28 • Bus: 251 • Rail: • 277 • Vehicle (drivers and passengers): 99 <p>As the above shows travel by foot is likely to be the highest mode of transport, though it cannot be understood if trips by foot include to destinations including where transport links would be taken for further travel. Vehicle trips generated by residents is still high at 99, this is especially astonishing for a site that would only provide 21 disabled bays. Three targets have been given which looks to decrease car use by 10%, increase cycling and walking by 5% all within five years. Some of these targets maybe slightly unrealistic due no real hard measure being given on how this will happen in practice.</p> <p>Overall, LBH Transport Planning find the current submitted Travel Plan draft not to be fully sufficient for a site of this size as some elements have been omitted from the document. Therefore, there will be a Travel Plan Monitoring Fee to be paid per year for the first 5 years for</p>	

Stakeholder	Comment	Response
	<p>the separate submission of residential and commercial travel plans that will be secured by way of a S.106 obligation.</p> <p>Car clubs The Transport Assessment includes a proposal to have a single car club bay installed on Selby Road. Given the scale of this proposal which is for 202 residential dwellings and a small commercial unit and to ensure that the site is being sufficiently supported to maximise its potential to increase uses of sustainable transport and deter the use of the private car usage the developer will be required to work with a car club operator to provide a new car club bay on-street within the vicinity of the development which residents can make use of.</p> <p>This will assist with reducing the rate of car ownership by residents of this development and help to offset any potential future car parking demands on local residential streets when as the CPZ restrictions do not fully operate all of the time and there is potential for the site to increase on-street parking demand. The applicant will also be required to provide 2 years of car club membership for each residential unit, along with £100 driving credit for each resident this will be secured via S.106 obligation. Full details on the car club provision must be submitted to the local authority for approval at least 6 months before the development is occupied as part of the travel plan.</p> <p>Construction and logistics A draft Construction Logistics Plan has been received as part of the Transport Assessment. The programme of works is expected to take at least 18 months. Vehicle routing for the site is proposed via White Hart Lane/Creighton Road including HGVs. Previous highways feasibility work conducted by the council concluded that these roundabouts are not unsuitable for large vehicles movements, especially those of 16.5m HGVs without damaging infrastructure or creating unsafe road conditions for other road users.</p> <p>More information is required on trip generation, swept paths, and possible forms of mitigation to offset construction. All routing will need to be agreed as part of the revised CLP which must be secured via a S.106 obligation.</p> <p>A staff construction travel plan will need to be created, effective monitoring is needed to ensure that no worker is travelling by car to the site and parking locally given.</p>	

Stakeholder	Comment	Response
	<p>Any parking restrictions or closure of the footways/suspensions of parking bays if required will need licenses that the developer/applicant will need to apply from the council and will need agreement on how these will be undertaken by the developer in a safe manner.</p> <p>Finally, before construction can begin a general highway survey will need to be carried at to ascertain the condition of the footway and highway to determine if vehicle accesses will need to be reinforced. A further survey will need to be undertaken after works has been completed to determine if the condition of the highway has deteriorated during construction.</p> <p>A fully detailed draft of a worked-up Construction Logistics Plan will be required for review and approval prior to commencement of any site works. The applicant will need to liaise and discuss intended means of access and servicing the site from the Highway with Haringey Council's Network Management and Transport Planning teams. The outcomes of these conversations will need to inform the finished CLP.</p> <p>A CLP should include the following:</p> <ul style="list-style-type: none"> • High provision of cycle parking for workers for all phases of construction to promote uptake of cycling to/from the site. • Givens the sites excellent connectivity to public transport which is demonstrated through its close proximity to public transport, and local parking restrictions no on-site car parking should be provided for workers. • The following times, 08:00-09:00, 15:00-16:00, and 17:00-18:00, will need to be avoided by delivery and construction vehicles as to prevent vehicles from related to the development travelling when the road network is at its busiest because of school drop-off/pick-up times and peak road congestion. • Effort should be made to have a process in place to deal with delivery/construction vehicles that turn up late or announced, as to prevent vehicles waiting on the public highway causing an obstruction or waiting on nearby residential streets given the sites location. <p>LBH Transport Planning would require that a Construction Logistics Plan (CLP) be submitted by the developer/applicant, this can be secured via a S.106 obligation. The developer/applicant will need to adhere to Transport for London's CLP guidance when compiling the document, construction activity should also be planned to avoid the critical school drop off and collection periods, the applicant will be required to pay a construction travel plan contribution of fifteen thousand pounds (£15,000) for the monitoring of the site's construction activities.</p>	

Stakeholder	Comment	Response
	<p>Recommendation There are no highway objections to this proposal subject to the following conditions, S.106 and S.278 obligations.</p> <p>Conditions <u>1. Delivery and Servicing Plan and Waste Management</u> The owner shall be required to submit a Delivery and Servicing Plan (DSP) for the local authority's approval. The DSP must be in place prior to occupation of the development. The service and delivery plan must also include a waste management plan which includes details of how refuse is to be collected from the site, the plan should be prepared in line with the requirements of the Council's waste management service which must ensure that all bins are within 10 metres carrying distance of a refuse truck on a waste collection day. It should demonstrate how the development will include the consolidation of deliveries and enable last mile delivery using cargo bikes.</p> <p>Details should be provided on how deliveries can take place without impacting on the public highway, the document should be produced in line with TfL guidance.</p> <p>The final DSP must be submitted at least 6 months before the site is occupied and must be reviewed annually in line with the travel plan for a period of 3 years unless otherwise agreed by the highway's authority. REASON: To ensure that the development does not prejudice the free flow of traffic or public safety along the neighbouring highway and to comply with the TfL DSP guidance 2020</p> <p><u>2. Cycle Parking</u> The applicant will be required to submit plans showing accessible; sheltered, and secure cycle parking for 382 long-stay and 7 short-stay for residents. The quantity must be in line with the London Plan 2021 T5 Cycle and the design must be in accordance with the London Cycle Design Standard. No Development (including demolition) shall take place on site until the details have been submitted and approved in writing by the Council.</p> <p>REASON: to be in accordance with the published London Plan 2021 Policy T5, and the cycle parking must be in line with the London Cycle Design Standards (LCDS).</p> <p><u>3. Electric Vehicle Charging</u></p>	

Stakeholder	Comment	Response
	<p>Subject to a condition requiring the provision of 6 active and 17 passive electric vehicle charging points to serve the on-site parking spaces from the onset.</p> <p>REASON: to be in accordance with published Haringey Council Development Management DPD, Chapter 5 Transport & Parking and the published London Plan 2021 Policy T6.1 Residential Parking.</p> <p><u>4. Disabled parking bays</u> The applicant will be required to submit and provide plans showing 10% of all units having access to a wheelchair accessible car parking spaces from the onset; this must be submitted for approval before any development commences on site. The spaces should be provided on-site. Furthermore, the plan will need to show a plan showing 21 residential and 2 Selby Sport Hall on-site car parking spaces.</p> <p>REASON: to ensure the development is in accordance with the published London Plan 2021 Policies T6.1 Residential parking, T6.5 Non-residential disabled persons parking, and the Department for Transport's Inclusive Mobility guidance.</p> <p><u>5. Car Parking Management Plan</u> The applicant will be required to provide a Car Parking Management Plan which must include details on the allocation and management of the on-site car parking spaces including all accessible car parking spaces (private and affordable housing) should be leased and allocated in the following order:</p> <ol style="list-style-type: none"> 1) Wheelchair accessible units or residents with a disability with the need for a car parking space 2) Family size units 4/3 bed units 3) 2 bed four person units 4) 2 bed 3 person units 5) Any other units <p><u>6. Event Management Plan</u> The applicant will be required to provide an event management plan/ local area management plan which includes the following information:</p> <ol style="list-style-type: none"> a) Crowd management and dispersal including Stewarding. 	

Stakeholder	Comment	Response
	<p>b) Travel Demand Management Plan in line with the Travel Plan which promotes travel by sustainable modes of transport to reducing travel by car and local car parking demand.</p> <p>c) Signage strategy to local transport interchange</p> <p>d) Taxi collection strategy including drop off and collection.</p> <p>REASON: To enable visitors to consider sustainable transport options, as part of the measures to limit any net increase in travel movements by car.</p> <p>S.106 obligations</p> <p><u>1. Car-capped Agreement</u></p> <p>The owner is required to enter into a Section 106 Agreement to ensure that the residential units are defined as "car capped " and therefore no residents therein will be entitled to apply for a residents parking permit under the terms of the relevant Traffic Management Order (TMO) controlling on-street parking in the vicinity of the development. The applicant must contribute a sum of £4000 (four thousand pounds) towards the amendment of the Traffic Management Order for this purpose.</p> <p>REASON: To ensure that the development proposal is car-free, and any residual car parking demand generated by the development will not impact on existing residential amenity.</p> <p><u>2. Construction Logistics and Management Plan</u></p> <p>The applicant/developer is required to submit a Construction Logistics and Management Plan, 6 months (six months) prior to the commencement of development and approved in writing by the local planning authority. The applicant will be required to contribute, by way of a Section 106 agreement, a sum of £15,000 (fifteen thousand pounds) to cover officer time required to administer and oversee the arrangements and ensure highways impacts are managed to minimise nuisance for other highways users, residents, and businesses. The plan shall include the following matters, but not limited to, and the development shall be undertaken in accordance with the details as approved:</p> <p>a) Routing of excavation and construction vehicles, including a response to existing or known projected major building works at other sites in the vicinity and local works on the highway.</p> <p>b) The estimated number and type of vehicles per day/week.</p> <p>c) Estimates for the number and type of parking suspensions that will be required.</p>	

Stakeholder	Comment	Response
	<ul style="list-style-type: none"> d) Details of measures to protect pedestrians and other highway users from construction activities on the highway. e) The undertaking of a highways condition survey before and after completion. f) The implementation and use of the Construction Logistics and Community Safety (CLOCS) standard. g) The applicant will be required to contact LBH Highways to agree condition on surveys. h) Site logistics layout plan, including parking suspensions, turning movements, and closure of footways. i) Swept path drawings. <p>REASON: to ensure that the impacts of the development proposal on the local highways network are minimised during construction, and to coordinate construction activities in key regeneration areas which will have increased construction activities.</p> <p><u>3. Car Club Membership</u> The applicant will be required to enter into a Section 106 Agreement to establish a car club scheme, including the provision of adequate car club bays and associated costs, and must include the provision of five years' free membership for all residents and £100 (one hundred pounds in credit) per year/per unit for the first 2 years.</p> <p>REASON: To enable residential and student occupiers to consider sustainable transport options, as part of the measures to limit any net increase in travel movements.</p> <p><u>4. Commercial Travel Plan</u> A commercial travel plan must be secured by the S.106 agreement and submitted 6 months before occupation. As part of the travel plan, the following measures must be included to maximise the use of public transport.</p> <ul style="list-style-type: none"> a) The applicant submits a Commercial Travel Plan for the commercial aspect of the Development and appoints a travel plan coordinator who must work in collaboration with the Facility Management Team to monitor the travel plan initiatives annually for a period of 5 years and must include the following measures: b) Provision of commercial induction packs containing public transport and cycling/walking information, available bus/rail/tube services, showers. Lockers, map and timetables to all new staff, travel pack to be approved by the Councils transportation planning team. c) The applicant will be required to provide, showers lockers and changing room facility for the commercial element of the development. 	

Stakeholder	Comment	Response
	<p>d) The developer is required to pay a sum of £3,000 (three thousand pounds) per year per travel plan for monitoring of the travel plan for a period of 5 years. This must be secured by S.106 agreement.</p> <p>REASON: To promote travel by sustainable modes of transport in line with the London Plan 2021 and the Council's Local Plan SP7 and the Development Management DMPD Policy DM 32.</p> <p><u>5. Residential Travel Plan</u></p> <p>Within six (6) months of first occupation of the proposed new residential development a Travel Plan for the approved residential uses must be submitted to and approved by the Local Planning Authority detailing means of conveying information for new occupiers and techniques for advising residents of sustainable travel options. The Travel Plan shall then be implemented in accordance with a timetable of implementation, monitoring, and review to be agreed in writing by the Local Planning Authority, we will require the following measures to be included as part of the travel plan to maximise the use of sustainable modes of transport.</p> <ul style="list-style-type: none"> a) The developer must appoint a travel plan co-ordinator, working in collaboration with the Estate Management Team, to monitor the travel plan initiatives annually for a minimum period of 5 years. b) Provision of welcome induction packs containing public transport and cycling/walking information to every new resident, along with a £200 voucher for active travel related equipment purchases. c) The applicant is required to pay a sum of, £3,000 (three thousand pounds) per year per travel plan for a period of five years. £15,000 (fifteen thousand pounds) in total for the monitoring of the travel plan initiatives. d) Parking management plan which monitors the provision of disabled car parking spaces for the site and triggers any necessary provision on the local highways network. <p>Reason: To enable residential occupiers to consider sustainable transport options, as part of the measures to limit any net increase in travel movements.</p> <p><u>6. Parking Management Contribution.</u></p> <p>We will require a contribution of £80,000 (Eighty Thousand Pounds) from the applicant to undertake a review of the current parking management measures on Selby Road and other roads contained within the Tottenham Event Day CPZ for the implementation of parking and loading measures and potential changes to the CPZ operational hours.</p>	

Stakeholder	Comment	Response
	<p>REASON: To implement parking management measures to mitigate the impacts of the additional car parking demand that will be generated by the development proposal on the local transport network.</p> <p><u>7.Highway Improvements</u></p> <p>The applicant will be required to enter into agreement with the Highway Authority under Section:</p> <p>38 and 278 of the Highways Act, to pay for any necessary highway works, which includes if required, but not limited to, footway improvement works, access to the Highway, measures for street furniture relocation, carriageway markings, and access and visibility safety requirements, improved pedestrian infrastructure. The developer will be required to provide details of any temporary highways including temporary TMO's required to enable the occupation of each phase of the development, which will have to be costed and implemented independently of the main S.278 works. The works include but are not limited to:</p> <ol style="list-style-type: none"> 1) The provision of a new Car Club Bay on Selby Road which is to be supported with a separate electric vehicle charging facility, type of EV charge to be agreed by the highway authority. 2) Reconstruction of footways nearby to the site to mitigate deterioration caused by the development on Selby Road. 3) The creation of a new pedestrian and cycle access onto Weir Hall Road footway/highway in order to connect with the developments new active travel link. 4) Reinstatement of footways where the current vehicle crossovers are no longer needed, as they will become redundant as result of the development on Selby Road 5) Realignment of the highway including a new road layout on Selby Road which looks to retain the existing turning head to allow for current residents to be effectively served by vehicles greater than 7m. <p>The scheme should be design in line with the 'Healthy Streets' indicators perspective, full list of requirements to be agreed with the Highways Authority. The applicant will be required to submit detailed drawings and a Stage 1, and 2 road safety audit of the highways works for all elements of the scheme including the details of the footpath, these drawings should be submitted for approval before any development commences on site.</p>	

Stakeholder	Comment	Response
	<p>REASON: to improve accessibility to the site by foot and to ensure that the site is in accordance with the London Plan 2021 Policy T2 Healthy Streets a to implement highway works to facilitate future access to the development site.</p>	
Waste / Cleansing	<p>Thank you for contacting Haringey's waste team about this application. The comments about this proposal at Community Centre, Selby Centre, Selby Road, Tottenham, London, N17 8JL, relate to the refuse and recycling arrangements of the completed development as outlined in the operational waste management strategy. They do not cover the demolition and construction waste produced during the building works.</p> <p>The operational waste management strategy outlines how the annual municipal waste quantities estimated to be generated by the development have been calculated. This equates to 916 tonnes of municipal waste although the volume of waste is expected to be lower.</p> <p>Consideration of further waste separation and waste minimisation measures have been included as part of this strategy which is welcome, as legislation and LB Haringey contracts may change in the future.</p> <p>Table 3-5 pg. 11 outlines the waste storage requirements for the properties with communal waste storage. These meet Haringey's waste supplementary planning guidance in terms of numbers, types, locations and configuration. The DAS confirms that drag distances from the bin stores to the refuse vehicles are within the 10m threshold and that surfaces are step free. Efforts to ensure unimpeded vehicle access to the bin stores and measures in place that mean there is no need for reversing and turns is also welcome.</p> <p>A full swept path analysis for the RCV manoeuvres within the Proposed Development is provided with this application and has been shared with Haringey's appointed waste contractor Veolia. They have not raised any concerns.</p> <p>L B Haringey does not have waste guidance for commercial waste. Collections from these premises are chargeable and can be provided either with Haringey / Veolia, or a private waste collector. We would ask that whoever is used, is a registered waste carrier, complying with the waste duty of care code of practice and can produce the relevant documentation if requested.</p>	<p>Noted that waste proposals are accepted.</p> <p>Conditions recommended securing Operational Waste Management Plan and Site Waste Management Plan.</p>
EXTERNAL		
Cadent Gas	<p>Your planning application – No objection, informative note required</p> <p>We have received a notification from the LinesearchbeforeUdig (LSBUD) platform regarding a planning application that has been submitted which is in close proximity to our medium and low pressure assets.</p>	<p>Informative recommended.</p>

Stakeholder	Comment	Response
	<p>We have no objection to this proposal from a planning perspective, however we need you to take the following action.</p> <p>What you need to do</p> <p>To prevent damage to our assets or interference with our rights, please add the following Informative Note into the Decision Notice:</p> <p><i>Cadent Gas Ltd own and operate the gas infrastructure within the area of your development. There may be a legal interest (easements and other rights) in the land that restrict activity in proximity to Cadent assets in private land. The applicant must ensure that the proposed works do not infringe on legal rights of access and or restrictive covenants that exist.</i></p> <p><i>If buildings or structures are proposed directly above the apparatus the development may only take place following diversion of the apparatus. The applicant should apply online to have apparatus diverted in advance of any works, by visiting cadentgas.com/diversions</i></p> <p><i>Prior to carrying out works, including the construction of access points, please register on www.linerearchbeforeudig.co.uk to submit details of the planned works for review, ensuring requirements are adhered to.</i></p> <p>Your responsibilities and obligations</p> <p>Cadent may have a Deed of Easement on the pipeline, which provides us with a right of access for a number of functions and prevents change to existing ground levels, storage of materials. It also prevents the erection of permanent/temporary buildings, or structures. If necessary Cadent will take action to legally enforce the terms of the easement.</p> <p>This letter does not constitute any formal agreement or consent for any proposed development work either generally or related to Cadent's easements or other rights, or any planning or building regulations applications.</p> <p>Cadent Gas Ltd or their agents, servants or contractors do not accept any liability for any losses arising under or in connection with this information. This limit on liability applies to all and any claims in contract, tort (including negligence), misrepresentation (excluding fraudulent misrepresentation), breach of statutory duty or otherwise. This limit on liability does not exclude or restrict liability where prohibited by the law nor does it supersede the express terms of any related agreements.</p>	

Stakeholder	Comment	Response
	<p>If you need any further information or have any questions about the outcome, please contact us at plantprotection@cadentgas.com or on 0800 688 588 quoting your reference at the top of this letter.</p>	
Environment Agency	<p>There are no constraints that we would comment on with regards to this application. Therefore, we have classed this an inappropriate consultation, and we have no formal comments to give.</p>	Noted.
Greater London Archaeology Advisory Service (GLAAS)	<p><u>Assessment of Significance and Impact</u></p> <p>The planning application lies adjacent to an area of archaeological interest (Archaeological Priority Area) identified in the Local Plan: [77751] The Lea Valley.</p> <p>The floodplain of the River Lea has been a focus of activity since the prehistoric period and accordingly it has the potential to contain archaeological remains from all periods. The submitted DBA (MOLA 2024) incorporates the results of a borehole survey which demonstrated that the top of River Terrace Gravel Deposits were encountered at depths which will be impacted by the development, and in one location contained peat. Such deposits have the potential to hold information about past human activity and the environment in prehistory. Moreover, the site has been relatively undeveloped until the 20th century, and the northern half has remained open throughout.</p> <p>There is therefore potential for deposits of archaeological significance to survive, and these would be negatively impacted by the scheme's piled foundations, drainage and service groundworks, as well as the inclusion of a basement.</p> <p><u>Planning Policies</u></p> <p>NPPF Section 16 and the London Plan (2021 Policy HC1) recognise the positive contribution of heritage assets of all kinds and make the conservation of archaeological interest a material planning consideration. NPPF paragraph 200 says applicants should provide an archaeological assessment if their development could affect a heritage asset of archaeological interest.</p> <p>NPPF paragraphs 195 and 203 and London Plan Policy HC1 emphasise the positive contributions heritage assets can make to sustainable communities and places. Where appropriate, applicants should therefore also expect to identify enhancement opportunities.</p> <p>If you grant planning consent, paragraph 211 of the NPPF says that applicants should record the significance of any heritage assets that the development harms. Applicants should also improve knowledge of assets and make this public.</p>	Conditions recommended.

Stakeholder	Comment	Response
	<p><u>Recommendations</u></p> <p>I advise that the development could cause harm to archaeological remains and field evaluation is needed to determine appropriate mitigation. However, although the NPPF envisages evaluation being undertaken prior to determination, in this case consideration of the nature of the development, the archaeological interest and/or practical constraints are such that I consider a two-stage archaeological condition could provide an acceptable safeguard. This would comprise firstly, evaluation to clarify the nature and extent of surviving remains, followed, if necessary, by a full investigation.</p> <p>I therefore recommend attaching two (2) conditions as follows:</p> <p>Condition 1 <i>No demolition or development shall take place until a stage 1 written scheme of investigation (WSI) has been submitted to and approved by the local planning authority in writing. For land that is included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI, and the programme and methodology of site evaluation and the nomination of a competent person(s) or organisation to undertake the agreed works.</i></p> <p><i>If heritage assets of archaeological interest are identified by stage 1 then for those parts of the site which have archaeological interest a stage 2 WSI shall be submitted to and approved by the local planning authority in writing. For land that is included within the stage 2 WSI, no demolition/development shall take place other than in accordance with the agreed stage 2 WSI which shall include:</i></p> <p><i>A. The statement of significance and research objectives, the programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works</i></p> <p><i>B. Where appropriate, details of a programme for delivering related positive public benefits</i></p> <p><i>C. The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material. This part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the stage 2 WSI.</i></p> <p>Informative Written schemes of investigation will need to be prepared and implemented by a suitably professionally accredited archaeological practice in accordance with Historic England's Guidelines for Archaeological Projects in Greater London. This condition is exempt from deemed discharge under schedule 6 of The Town and Country Planning (Development Management Procedure) (England) Order 2015.</p> <p>Condition 2 <i>No development shall commence until details of an appropriate programme of public engagement including a timetable have been submitted and approved in writing by the local planning authority. The development shall be carried out in accordance with the approved programme.</i></p>	

Stakeholder	Comment	Response
	<p>Informative: Historic England’s Guidelines for Archaeological Projects in Greater London provides advice on popular interpretation and presentation options.</p> <p>These pre-commencement conditions are necessary to safeguard the archaeological interest on this site. Approval of the WSI before works begin on site provides clarity on what investigations are required, and their timing in relation to the development programme. If the applicant does not agree to these pre-commencement conditions, please let us know their reasons and any alternatives suggested. Without these pre-commencement conditions being imposed the application should be refused as it would not comply with NPPF paragraph 211.</p> <p>I envisage that the archaeological fieldwork would comprise the following:</p> <p>Evaluation An archaeological field evaluation involves exploratory fieldwork to determine if significant remains are present on a site and if so to define their character, extent, quality and preservation. Field evaluation may involve one or more techniques depending on the nature of the site and its archaeological potential. It will normally include excavation of trial trenches. A field evaluation report will usually be used to inform a planning decision (pre-determination evaluation) but can also be required by condition to refine a mitigation strategy after permission has been granted.</p> <p>The development is split into two application sites between LBs Enfield (24/03470/FUL) and Haringey (HGY/2024/2851), but one archaeological contractor should be instructed to cover both. Specialist geoarchaeological and palaeoenviromental advice should be sought.</p> <p>You can find more information on archaeology and planning in Greater London on our website.</p>	
<p>Greater London Authority (GLA) / The Mayor of London</p>	<p>The full Stage 1 response can be found in Appendix 9 – The Strategic issues summary is included below:</p> <p>Land use principles: The redevelopment and enhancement of the social infrastructure and sports and recreational facilities on site is strongly supported.</p> <p>Affordable housing: The proposal delivers 202 affordable homes (100% by habitable room), at low cost rent, which is strongly supported.</p> <p>Urban design: Whilst the development doesn’t meet the locational requirements of policy D9, the proposed height, massing and design of the development is supported in principle. A</p>	<p>General support noted. Conditions recommended</p>

Stakeholder	Comment	Response
	<p>conclusion regarding compliance with part C of policy D9 will be made at the Mayors decision making stage.</p> <p>Other issues on transport, energy, whole life carbon and circular economy also require resolution prior to the Mayor's decision making stage.</p>	
London Borough of Enfield (LBE)	<p>Thank you for consulting the London Borough of Enfield LPA on the above application.</p> <p>I can confirm that we raise <u>no objection</u> to the submission as there would be no strategic implications to the Borough of Enfield.</p>	Noted.
Metropolitan Police - Designing Out Crime Officer (DOCO)	<p><u>Section 1 - Introduction:</u></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>At this stage I can confirm we have held meeting with the project design team at all stages of design and the project has embraced our concerns and these in the main are included within the application DAS.</p> <p>Whilst in principle we have no objections to the application intent, it's our experience that value engineering can remove many of the required security layers that would enable the project to achieve the required level of Secured by Design compliance.</p> <p>We therefore recommend the attachment of suitably worded conditions and an informative. The comments made can easily be mitigated early if the Architects ensure the ongoing dialogue with our department continues throughout the design and build process. This can be achieved by the below Secured by Design conditions being applied (Section 2). If the Conditions are applied, we request the completion of the relevant SBD application forms at the earliest opportunity.</p> <p>The project has the potential to achieve a Secured by Design Accreditation if advice given is adhered to.</p>	Condition and informative recommended.

Stakeholder	Comment	Response
	<p><u>Section 2 - Secured by Design Conditions and Informative:</u></p> <p>In light of the information provided, we request the following Conditions and Informative:</p> <p><u>Conditions:</u></p> <p>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.</p> <p>The development shall only be carried out in accordance with the approved details.</p> <p>B. Prior to the first occupation of each building, or part of a building or its use, 'Secured by Design' certification shall be obtained for such building or part of such building or its use and thereafter all features are to be retained.</p> <p>Reason: In the interest of creating safer, sustainable communities.</p> <p><u>Informative:</u></p> <p>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 0208 217 3813.</p> <p><u>Section 3 - Conclusion:</u></p> <p>We would ask that our department's interest in this planning application is noted and that we are advised of the final Decision Notice, with attention drawn to any changes within the development and subsequent Condition that has been implemented with crime prevention, security and community safety in mind.</p> <p>Should the Planning Authority require clarification of any of the recommendations/comments given in the appendices please do not hesitate to contact us at the above office.</p> <p>Appendix 1: Concerns and Comments</p>	

Stakeholder	Comment	Response
	<p>In summary we have overall site specific comments in relation to the following items. This list is not exhaustive and acts as initial observations based on the available plans from the architect and local authority planning portal.</p> <p>It has been noted that there have been several meetings with minutes and recommendations documented by the architects which facilitate early pre-application advice given by our department. Should this advice be taken, then SBD accreditation will be achieved.</p> <p>Site specific advice may change depending on further information provided or site limitations as the project develops:</p> <p>This list is not exhaustive and acts as concerns raised during consultation with the architects pre-application.</p> <p>Note - That the pre-application phase concentrated on the design of the layout of the development, the following also provides the material aspect of the physical target hardening requirements to achieve Secured by Design accreditation and this has not been discussed in detail with the architects or developers.</p> <p>Site specific advice may change depending on further information or site limitations as the project develops:</p>	

Stakeholder	Comment		Response
	A- Boundary Treatment		
	Height	Ideally side and rear boundary onto the public realm should be 2.4m (potentially 1.8m with 600mm trellis or 2.1m with a 300mm trellis). Any vertical transom (support) should be inward facing.	
	Party Boundary	Fencing between rear gardens should be at least 1800mm high and designed to avoid climbing aids. Any vertical transom (support) should be inward facing.	
	Fencing Material Wood	If wood material, ensure panels are vertical with no support beams allowing climbing opportunities. Panels to be mechanically secured in place to prevent lift removal.	
	Fencing Material Metal	Metal fabrication, should be robust, have an unfinished top rail (exposed tops), to deter loitering, sitting and climbing.	
	Railing Fencing	All perimeter railings to have a maximum 50mm spacing centre to centre, be set flush to the front of any wall. If strengthened with mid rail must be designed to deter climbing and mid rail to be inward facing.	
	Railing Fencing	Any perimeter boundary treatment (railings) should be between 1.1m and 1.35m - ideally designed to provide visual permeability.	
	Gating	Designed level to the front building line, any locking mechanism, hinges to be anti-climb and fitted with a dampened stop. Gating to be inclusive of a self-closer and the same height as the perimeter treatment including any trellising.	
	Recess	Where possible building lines should be flush to allow natural surveillance, any recesses should not exceed 600mm.	

Anti- Climb	If anti-climbing measures are introduced then signage should be used to comply with Occupiers Liability Act 1984.
Fencing Type	Any boundary treatments should be UKAS certified as recommended by a DOCO
Low Height boundaries	All low defensive wall/railings to be designed to deter sitting, loitering and climbing.

Access Control

Access Control	Access control at the vehicle and pedestrian gate is required to maintain security in communal areas. All panels to have audio/visual capability.
Access Panel	Access control panels (anti-vandal) should achieve the Secured by Design required standard – UL293.
Trades Button	No Trades Button on control panel
Audio/Visual Entry (Camera)	DDA (Part M) compliant camera alone is insufficient for first entry door. Primary camera location on access control panel to be considered to capture all visitors. Secondary camera will be required to the side/height that provides the resident a clear image of the visitor.
Data Retention Fob Access	Data retention of access control activations should be utilised throughout the site with the facility to store data for one calendar month before over writing. This data should be available to Police within 24 hours for evidential purposes should it be required. *Consideration to be given to appropriate and sufficient hard drive storage*
Integrated (Part B/ ADQ) Compliance	Access control systems should be Integrated to utilise both fire and security systems.
Emergency Release (Push To Exit)	Vehicle gate should be fob both ways with no induction plate and pedestrian gate should be access controlled for both residents and visitors. Any Green Break Glass panels must be a self-resettable type.
Plant Room/ Service Rooms	All service/plant door set/s accessible by public realm are required to be one of the following UKAS certified products subject to a crime risk assessment by a DOCO: LPS1175 issue 7 SR2 (or LPS 1175 Issue 8 B3) or STS202 Issue 3:2011 BR 2+ or LPS2081 SR2 B+ or Equivalent certification * Service/plant door/s should be self-closing, self-locking single doors*
Pedestrian & Vehicular Gates	Access controlled external pedestrian and vehicular gates that provide entry to the development should be accredited to LPS1175 SR2 or equivalent and include Magnetic locks - 2 x 500kg (minimum) resistance (1200lbs/psi) placed a third from the top and a third from the bottom. Designed level to the front building line, be anti-climb and fitted with a dampened stop.
Internet Of Things (IoT)	Due consideration to be given to the security/risk management to access control systems dependent upon how they interact with IoT.

Fire Access - Gates

Access Control Box(ACB)	<p>If the cause and effect of a fire over ride switch (FOS) activation poses a crime risk consideration to an Access Control Box should be made.</p> <p>The project fire consultant should be made aware of any Part B Security v's Safety conflicts</p>
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Doors	
Recessed Areas	Any recesses should not exceed 600mm, but consideration can be given to the Disability Discrimination Act (DDA) requirements. Be advised further by borough occupational therapist.
Accessible Doors Apartment and Townhouses	<p>All accessible residential Doors are required to be the following UKAS certified minimum standard: PAS24:2016</p> <p>This includes sliding and bi-fold door sets not designated as the primary access/egress routes.</p>
Street Opening Front Doors	Flat/Duplex/House front doors to meet a minimum standard of PAS24:2016 and ideally have a split spindle handle mechanism (requires key to gain access from outside of property) with internal thumb turn.
Residential Door Fittings	The security door viewer should be integral to the product specification. Awareness to DDA requirements for height and number of door viewers.
	The door chain or opening limiter should be affixed to the door set framing not cosmetic architrave.
	Any mail delivery letter plate with-in a PAS24:2016 door set should be compliant to TS008 and where possible incorporate and anti-fish cowl.
Locks	All locks are to be part of the accredited PAS24:2016 specification.

Postal Strategy	
External Secure Mailboxes	Secure mailboxes to serve each property should preferably be fixed to the external face of the building. External post boxes should be covered by CCTV and meet TS009 standards or MPS robust mailbox specification.

Windows	
Accessible Windows & Roof Lights	<p>All easily accessible windows (anything under 2m from another surface treatment) should be certificated to either:</p> <ul style="list-style-type: none"> *PAS24:2016 with BS EN356:2000 min. P2A glazing (consider P3A) *STS204 Issue 6:2016, *STS202 Issue 7:2016 Burglary Rating 1 *LPS1175 Issue 7.2:2014 Security Rating 1 or *LPS1175 Issue 8:2018 A1 Security Rating 1 or *LPS 2081 Issue 1.1:2016 Security Rating A. <p>Accessible windows includes any glass reached by climbing any number of floors via rain water pipes, balconies or via communal walkways (whether walkway accessed through secure door or not and be fitted with a restrictor)</p>

Glazed Apertures	All glazing in and adjacent to: *Residential, communal, front, back doors and ground floor windows *Communal windows that are easily accessible above ground floor level Should incorporate security glazing to the equal standard of the agreed door specification.
Lockable Window Handles	Any window within 2m of an accessible surface should have key operated locks. Where windows form an escape route, Part B (Fire) compliance should be adhered to. All ground floor, vulnerable and accessible windows must have a lockable window restrictor to prevent unauthorised access.
Access control	
Access Control Layers	Vehicle gate – Fob access both way for residents only Pedestrian Gate – Fob access for residents and Audio-visual access control for visitors
CCTV	CCTV can be used to support access control measures where access is gained into communal areas such as the rear garden and the front area

Cycle Stores	
External Cycle and Bulk Storage	Positioned as not to provide climbing aids to other vulnerable areas such as accessible window/s, door/s, balconies, flat roofs and podiums.
Timber Storage/Shed	Such timber sheds, must be of robust construction and designed to the SbD guidance (Sec 56). Requires at least 2 points of locking on the main door. If items of value are to be stored within the shed then a security anchor should be certificated to 'Sold Secure' Silver Standard LPS 1175 Issue 7.2:2014 Security Rating 1 or LPS 1175 Issue 8:2018 Security Rating A1.
Cycle Storage Lighting	Cycle storage lighting is required in all stores. In areas of no natural light or hours of darkness, a constant level of lighting is required for illumination. Connected lighting to provide low level lighting during inactivity and higher light levels when motion is detected. This development / application has cycle storage facilities and / or areas that may require the charging and storage of Lithium-ion powered vehicles or devices, within the building or the wider site footprint. The developer or developer's agent must be aware that it is their responsibility to inform the Responsible Person(s), Fire and Rescue Service and Building Control of these storage facilities and areas, to ensure that the necessary fire suppression measures for the charging and storage of lithium-ion products have been considered and specified.
Signage	No signage to be erected externally which would provide opportunity for offenders to identify cycle storage.
Bicycle Registry Management	Access to the cycle store should be prohibited. Only residents or users that register (name, address etc.) that information should be given access to the storage facility.
CCTV	CCTV must be installed around in cycle stores in public areas. Should have unhindered views of the racking at all times and should be vandal resistant.
Locking Points	There should be 3 locking points for cycles on the racks/stands provided. Cycle racking should be secured with anti-tamper fixings

Viewing Panel	Cycle store doors should allow light spill from with-in, either a small obscured viewing panel or robust louvre (as part of the door set).
Internal Signage	Ideally signage should be placed inside the store to reinforce importance of securing cycles by residents.

Balconies / Terraces & Door Canopies

Balconies	Enclosures to balconies at all levels should be designed to exclude handholds and to eliminate the opportunity for climbing up, down or across between balconies. If a free standing/bolt on balcony system is to be used, consideration must be given to the risk posed by climbing. To prevent this the design should incorporating physical obstructions to frustrate the climber.
Raised Planters	Raised planters should be designed to avoid space beneath to store items such as drugs or weapons and so they do not provide climbing aids to vulnerable areas or balconies
Door Canopies	Where possible, door canopies should be free standing and offer no means of climbing. They also should be of lightweight construction that would not support a person if climbed. If canopy is robust enough to withstand a person standing on top, all nearby windows will be classed as vulnerable and therefore will be required to be PAS24 P2A.

Lighting

Public Realm lighting	Whether adopted highways/footpaths/private estate roads or car parks should meet BS 5489:2020 standard.
Declaration of Conformity	See Secured by Design Homes 2024 section 19.5 Should be overseen by an independent and competent lighting engineer. They should be qualified to at least ILP Level 3 or 4 in line with the latest SBD guidance.
Internal lighting	Communal elements of any scheme, ideally should be a controlled by a photo electric sensor. This to ensure suitable levels of lighting at all times. Where no natural light is available two phased lighting can be used (low level for non-activity, higher level once movement is detected)
Lux levels	<p>Lux is the measurement of light reaching a surface (1 lux is the light emitted from one candle that is 1m away from a surface 1sqm). Examples of suitable Lux levels are listed below:</p> <ul style="list-style-type: none"> • Office interior (security) 05 Lux • Private car parks 10 Lux • Exterior Rural location 10 Lux • Exterior Urban location 20 Lux • Walkways 30 Lux • Loading bays 50 Lux <p>Further guidance is available in the "Lighting against crime" manual.</p>
Uniformity (Uo)	<p>The even distribution of light across the area being illuminated. A good lighting system is one designed to distribute an appropriate amount of light evenly with uniformity and should include the following:</p> <ul style="list-style-type: none"> • Values of between 0.25 and 0.40 • Using lamps with a rating of at least 60 (minimum) on the Colour Rendering Index. • Good lighting will use energy efficient lamps in suitable luminaries.

Stakeholder	Comment		Response
	Dusk-Till-Dawn Lighting	Lighting, where possible should consist of white light which is evenly distributed In Communal areas: • All entrances should have dusk till dawn lighting supported via a photo electric cell. Allowing lighting to controlled automatically. On Residential units: • All residential entrances (front, back, side doors) should also have dusk till dawn lighting, via a photo electric cell with a manual override. Allowing residents/the user local control.	
	Bollard lighting	Shall be avoided due to its history of vandalism and ease of been covered over. Up lighters and decorative lighting can be used but only in unison with columns providing the required standards of light for good clear facial recognition illumination.	
	Directional lighting	Can be used to support pedestrian routes. Should robust and vandal resistant and be part of an overall lighting strategy (as shown above) Directional lighting should not be a standalone solution to illumination.	
	Gates		
	Gate/s	Ideally gated full height or with infill panels above. Access control and gate/s to be as close to the forward building line as possible. There should be minimal gap beneath the gate. Designed to deter or prevent climbing. House and Duplex gates to include Self closer on the entrance leading to the street door Any gate design to be submitted and approved by DOCO	
	Ironmongery	All gates should be fitted using anti tamper proof hinges. All hinges and brackets must be fitted in such a way so as not to create a climbing aid.	
	Push to Exit	Egress button to be minimum of 1.5 metres away from gate and fully shrouded. Any associated cabling to be out of sight.	
	Pedestrian Gate/s	Designed to deter or prevent climbing. All pedestrian gates to have a minimum of 2 x 500kg resistance magnetic locks. Ideally positioned 1/3 from top and 1/3 from bottom. To be single leaf, self-closing and self-locking.	
	Climbing Points		
Rain Water Pipes	External rain water pipes should be square/rectangular, flush to the wall or recessed – if round they should be shrouded up to 3m minimum from ground level and have close/flush fitting brackets.		
Balcony to Balcony vulnerabilities	Consideration should also be given for opportunities to climb balcony to balcony both up and across Balustrade should be secured to the floor of the balcony and flush to the front removing any vulnerable grip points.		



Stakeholder	Comment		Response
	Balconies and adjacent features	Consider vulnerability of balconies by boundary walls along with <ul style="list-style-type: none">• Trees.• Door canopies.• Street furniture.• Neighbouring properties.• ACB and utility meters.• Any outbuildings such as cycle and refuse store.• Vehicles in parking areas.	
	Utility Meters		
	Utility Meters	All utility meters should be positioned where possible in external risers or cupboards removing the requirement for an official to enter the building to read them. Smart meters should be the default requirement for all developments.	
	Management Plan	If utility meter is to be located within residential unit representatives must have a scheduled appointment made with the concierge or Management Company to gain access to the building.	
	Car Parking		
	Location	Positioned as close as possible to buildings and overlooked by active windows. Should not be located close to boundary walls allowing vehicles to be used to climb into properties.	
	Lighting	Should be well lit to the latest standard of BS5489 (consider Park Mark guidance)	
		https://www.britishparking.co.uk/write/Documents/safer%20parking/SPS%20New%20Build%20Guidelines%20-%20web%20version.pdf	
	Alarm / C.C.T.V		
	Alarm Consideration	If an alarm is to be installed should meet BS EN 50131 (as minimum) which can include wireless systems. If an alarm is not fitted installers should provide a labelled 13amp fused spur on consumer unit for future use. https://www.policesecuritysystems.com/	

	CCTV Installation	<p>Please note where a development requires CCTV, this facility is to compliment other security measures, not to replace them. As a minimum police recommend coverage of the following areas:</p> <ul style="list-style-type: none">• Entrance & exit points including secondary coverage of call points,• Foyer / Lobby areas,• Post boxes and Postal rooms,• Cycle stores,• Refuse stores,• Underground or covered parking areas,• Top of stair cores <p>Due consideration to be given to other areas suitable for CCTV throughout the development as part of a site specific risk assessment.</p> <p>Homes 2019 (55.3.7) requests the system conforms to BS EN 62676: 2014 - video surveillance systems - and where applicable BS7958: 2015 CCTV management and operation codes of practice (COP) as outlined by the requirements of the Information Commissioner's Office.</p>
	Quality	Should be of good facial recognition and colour HD quality in both daylight and night vision.
	Housing & Signage	CCTV housing to be anti-vandal and potentially shrouded. Signage highlighting use of CCTV should displayed throughout the development.
	Storage & Access	<ul style="list-style-type: none">• Footage should be preserved for a minimum of 31 days.• Any CCTV system that captures footage of public areas must comply with the regulations outlined by the Information Commissioner's Office.• To be stored securely on a remote cloud system, or on a locked and secured hard drive i.e. within a secure area behind a PAS24:2016 door or SR1 lockable steel cabinet.• Police access to footage must be within a minimum of 24 hours and a maximum of 48 hours for evidential purposes.
Party Walling		
	Communal to Apartment Walling Preferred System	<p>Light weight framed walls either side of a secure door set (including 600mm around the whole door set) and partitioned walls between two dwellings or communal space shall meet the requirements below:</p> <ul style="list-style-type: none">• LPS1175 (Issue 7.2) SR1• LPS1175 (Issue 8) SR1/A1• STS202 Issue 7 BR1
	Apartment to Apartment Party Walling Alternative	<p>All avenues must be explored to meet the standards above, however the following are potential alternatives if the above cannot be achieved. To be agreed by DOCO.</p> <ul style="list-style-type: none">• E-WT-2 Timber Wall• E-WS-3 Light Steel Wall• E-WM-20 Masonry Wall <p>Installation of 9mm (min) timber sheathing or expanding metal in the areas concerned. Wherever possible C-Studs should have 300mm staggered centres.</p>
Public Realm & Landscaping		
	Permeability	<ul style="list-style-type: none">• Routes for pedestrians, cyclists and vehicles must be open, direct and not unnecessarily separated from one another.• Footpaths should not run to the rear of, and or provide access to gardens, rear yards or dwellings. If this is the case further mitigation will need to be discussed with the DOCO.
	Communal Areas	Communal areas such as playgrounds, seating or amenity areas should be designed to allow natural surveillance from nearby dwellings with safe routes for users to come and go.

Stakeholder	Comment	Response										
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<p>London Plan 2021 Policy D11: Safety, Security and Resilience to Emergency This policy links design out crime, counter terrorism prevention measures and acknowledges fire safety issues.</p> <p>Section B of policy D11 Boroughs should work with their local Metropolitan Police Service 'Design Out Crime' officers and planning teams, whilst also working with other agencies such as the London Fire Commissioner, the City of London Police and the British Transport Police to identify the community safety needs, policies and sites required for their area to support provision of necessary infrastructure to maintain a safe and secure environment and reduce the fear of crime. Policies and any site allocations, where locally justified, should be set out in Development Plans.</p> <p>Section C of policy D11 These measures should be considered at the start of the design process to ensure they are inclusive and aesthetically integrated into the development and the wider area. The policy considers not just crime, but also a wide range of hazards, such as fire, flood, extreme weather and terrorism. New buildings should therefore be resilient to all of these threats.</p>												

Stakeholder	Comment	Response
	<p>Paragraph 3.11.3 Measures to design out crime, including counter terrorism measures, should be integral to development proposals and considered early in the design process, taking into account the principles contained in guidance such as the Secured by Design Scheme published by the Police.... This will ensure development proposals provide adequate protection, do not compromise good design, do not shift vulnerabilities elsewhere, and are cost-effective. Development proposals should incorporate measures that are proportionate to the threat of the risk of an attack and the likely consequences of one.</p> <p>Paragraph 3.11.4 The Metropolitan Police (Designing Out Crime Officers and Counter Terrorism Security Advisors) should be consulted to ensure major developments contain appropriate design solutions, which mitigate the potential level of risk whilst ensuring the quality of places is maximised.</p> <p>Paragraph 3.12.10 Fire safety and security measures should be considered in conjunction with one another, in particular to avoid potential conflicts between security measures and means of escape or access of the fire and rescue service. Early consultation between the London Fire Brigade and the Metropolitan Police Service can successfully resolve any such issues.</p> <p>DMM4 (Policy DM2) Part A(d) "Have regard to the principles set out in 'Secured by Design'"</p> <p>DMM5: Para 2.14 - "Proposals will be assessed against the principles of secured by design'. The latest published guidance in this respect should be referred."</p> <p>An Independent Sustainability report by AECOM on Tottenham area action plan states: <i>"Crime is high in Tottenham with many residents concerned about safety, gang activity and high crime rates. Issues are particularly associated with Northumberland Park and Tottenham Hale"</i>.</p> <p>12.3 of same report states:</p> <ul style="list-style-type: none"> • Crime rates are relatively high across the borough and crime is particularly prevalent in Northumberland Park. There is a need to design schemes in order to reduce levels of crime, fear of crime and anti-social behaviour. Since unemployment is strongly correlated with acquisitive crime, there may also be a link to wider economic development. • There are no references to crime in the overarching policies, although it is recognised that housing and economic policies aim to support a very significant level of regeneration in the area. This could indirectly lead to reduced crime / fear of crime in the medium term through creating more high quality environments and more stable communities. AAP 06 includes requirements on urban design and character and seeks to maximise opportunities to create legible neighbourhoods, which may assist in creating safe, modern and high quality places. • There are no references to crime in the neighbourhood area sections; however they do set out key objectives which include considerations for safe and accessible environments. Furthermore, as noted above, the scale of regeneration proposed should indirectly lead to reductions in crime and fear of crime. Crime is particularly high in Northumberland Park and Tottenham Hale, hence this issue might be explicitly addressed in these sections; however, it is recognised that the DM Policies DPD includes Borough wide requirements in this regard. Also, AAP 06 sets out the Council's commitment to preparing Design Code Supplementary Planning Documents (SPDs) for Tottenham's Growth Areas, where opportunities for secure by design principles can be investigated. • In conclusion, the plan is likely to result in positive effects on the crime baseline if there is large scale regeneration (including jobs growth) and robust implementation of safer streets and other measures to design out crime in Tottenham, including particularly in Northumberland Park where crime levels are highest. 	

Stakeholder	Comment	Response														
	<div><div>Appendix 3 : Crime Figures</div><p>The crime figures provided below are publicly available on the Internet at http://www.met.police.uk/. The figures can at best be considered as indicative as they do not include the wide variety of calls for police assistance which do not result in a crime report. Many of these calls involve incidents of anti-social behaviour and disorder both of which have a negative impact on quality of life issues.</p><p>Haringey is one of 32 London Boroughs policed by the Metropolitan Police Service. It currently has crime figures above average for the London Boroughs and suffers from high levels of crime and disorder to its residents and business communities.</p><p>The following figures relate to recorded crime data from Police.uk for the below area:</p><div><div><div><div>Overview</div><div>Crime map</div><div>Stop and search</div><div>Statistics</div></div><div><table><tr><td>All Crimes (185)</td></tr><tr><td>All Crimes (185)</td></tr><tr><td>Anti-social behaviour (59)</td></tr><tr><td>Burglary (7)</td></tr><tr><td>Criminal damage and arson (6)</td></tr><tr><td>Drugs (14)</td></tr><tr><td>Other theft (10)</td></tr><tr><td>Possession of weapons (1)</td></tr><tr><td>Public order (15)</td></tr><tr><td>Robbery (4)</td></tr><tr><td>Shoplifting (1)</td></tr><tr><td>Theft from the person (10)</td></tr><tr><td>Vehicle crime (18)</td></tr><tr><td>Violence and sexual offences (40)</td></tr></table><div>July 2024</div></div></div></div></div>	All Crimes (185)	All Crimes (185)	Anti-social behaviour (59)	Burglary (7)	Criminal damage and arson (6)	Drugs (14)	Other theft (10)	Possession of weapons (1)	Public order (15)	Robbery (4)	Shoplifting (1)	Theft from the person (10)	Vehicle crime (18)	Violence and sexual offences (40)	
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Stakeholder	Comment	Response
		
		

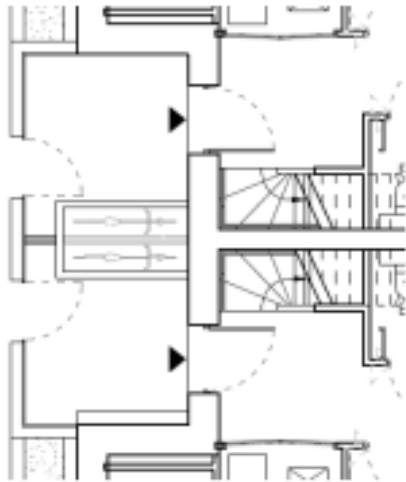
Stakeholder	Comment	Response
	<p>Whilst we cannot provide information down to street area the above information does indicate the level of ASB and associated crime that is typical for the ward, which should be a consideration when designing a development to ensure the reduction in fear of crime as well as crime itself.</p> <p>Anti-Social Behaviour (ASB)</p> <p>Particular attention must be drawn to the most prevalent type of incident that will be experienced – Anti-Social Behaviour (ASB). This category covers a multitude of types of incident that can range from what appears quite trivial annoyance to serious criminal acts. Often victims are able to shrug off the minor incidents and do not have the time or energy to report every occurrence, however en-mass these create a significant problem.</p> <p>Research by Ward, Thompson and Tseloni (2017) which was quoted in the victim commissioners report on ASB in 2019 stated:</p> <p><i>Less than a third of ASB incidents were reported to the three main reporting agencies - According to the 2015/16 CSEW, approximately 31% of ASB incidents were reported to the police, local authority or housing association/private landlord. Of those reported, most were reported to the police (of all agencies).</i></p> <p>It is therefore reasonable to assume that the statistics regarding ASB misrepresents the true scale of the problem – the actual figure of incidents is likely to be well over 150 incidents of ASB per month.</p>	
Natural England	<p>Given the amount of proposed new housing within this scheme (202 new homes) we would have no specific comments to make at this moment in time and can confirm that this would not require an HRA.</p> <p>Although we've not commented on other natural environment issues specifically that doesn't mean there might not be any however, we would suggest considering comments submitted by other interested parties on these matters.</p>	Noted.
Thames Water	<p>Waste Comments</p> <p>There are public sewers crossing or close to your development. If you're planning significant work near our sewers, it's important that you minimize the risk of damage. We'll need to check that your development doesn't limit repair or maintenance activities, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes</p> <p>The proposed development is located within 15 metres of a strategic sewer. Thames Water requests the following condition to be added to any planning permission. "No piling shall take place until a PILING METHOD STATEMENT (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) and piling layout plan including all Thames Water wastewater assets, the local topography and clearance between the face of the pile to the face of a pipe has been submitted to and approved in writing by the local planning</p>	Piling Method Statement, Foul Water, and Water conditions and informatives recommended.

Stakeholder	Comment	Response
	<p>authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement and piling layout plan. Reason: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to significantly impact / cause failure of local underground sewerage utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB</p> <p>Thames Water would advise that with regard to SURFACE WATER network infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.</p> <p>With the information provided, Thames Water has been unable to determine the Foul water infrastructure needs of this application. Thames Water has contacted the developer in an attempt to obtain this information and agree a position for FOUL WATER drainage, but have been unable to do so in the time available and as such, Thames Water request that the following condition be added to any planning permission. "No development shall be occupied until confirmation has been provided that either:- 1. Foul water Capacity exists off site to serve the development, or 2. A development and infrastructure phasing plan has been agreed with the Local Authority in consultation with Thames Water. Where a development and infrastructure phasing plan is agreed, no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan, or 3. All Foul water network upgrades required to accommodate the additional flows from the development have been completed. Reason - Network reinforcement works may be required to accommodate the proposed development. Any reinforcement works identified will be necessary in order to avoid sewage flooding and/or potential pollution incidents. The developer can request information to support the discharge of this condition by visiting the Thames Water website at thameswater.co.uk/preplanning. Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (e-mail: devcon.team@thameswater.co.uk) prior to the planning application approval.</p> <p>Water Comments</p> <p>There are water mains crossing or close to your development. Thames Water do NOT permit the building over or construction within 3m of water mains. If you're planning significant works near our mains (within 3m) we'll need to check that your development doesn't reduce capacity, limit repair or maintenance activities during and after construction, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes.</p>	

Stakeholder	Comment	Response
	<p data-bbox="409 142 1518 204"> https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes </p> <p data-bbox="409 240 1760 948"> Thames Water are currently working with the developer of application HGY/2024/2851 to identify and deliver the off site water infrastructure needs to serve the development. Thames Water have identified that some capacity exists within the water network to serve the Sports pavilion (peak flow of 1.33l/s) and 100 dwellings (up to domestic peak flow of 1.5 l/s) but beyond that upgrades to the water network will be required. Works are on going to understand this in more detail and as such Thames Water feel it would be prudent for an appropriately worded planning condition to be attached to any approval to ensure development doesn't outpace the delivery of essential infrastructure. There shall be no occupation beyond the Sports pavilion (peak flow of 1.33l/s) and 100 dwellings (up to domestic peak flow of 1.5 l/s) until confirmation has been provided that either:- all water network upgrades required to accommodate the additional demand to serve the development have been completed; or- a development and infrastructure phasing plan has been agreed with Thames Water to allow additional development to be occupied. Where a development and infrastructure phasing plan is agreed no occupation of those additional dwellings shall take place other than in accordance with the agreed development and infrastructure phasing plan. Reason - The development may lead to low / no water pressures and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development. Any necessary reinforcement works will be necessary in order to avoid low / no water pressure issues." Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (e-mail: devcon.team@thameswater.co.uk) prior to the planning application approval. </p> <p data-bbox="409 986 1727 1118"> Thames Water recommend the following informative be attached to this planning permission. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development. </p> <p data-bbox="409 1157 1742 1422"> The proposed development is located within 15m of our underground water assets and as such we would like the following informative attached to any approval granted. The proposed development is located within 15m of Thames Waters underground assets, as such the development could cause the assets to fail if appropriate measures are not taken. Please read our guide 'working near our assets' to ensure your workings are in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk </p> <p data-bbox="409 1460 784 1490"> Supplementary Comments </p>	

Stakeholder	Comment	Response
	<p>Thames Water are unable to confirm the foul water network has the capacity to accommodate this development as there is not enough detail set out within the drainage strategy. We will require the developer to confirm exactly the number of houses (and non housing development) that will be discharged to each specific manhole/part of our network and also confirming the size of the receiving sewer. We note this has been assessed at preliminary stages, but we need to ratify this information as part of the submitted drainage strategy and we have been unable to identify that level of detail.</p>	
<p>Transport for London (TfL)</p>	<p>Thank you for consulting TfL with regards to this referable planning application.</p> <p>I write to provide detailed strategic transport comments on this application reference 24/01905/FUL. These reflect the matters raised in the GLA Stage 1 planning report GLA/2024/0568 and GLA/2024/0587 dated 2 December 2024. Please note that these comments are additional to any response that you may have received from colleagues within different parts of Transport for London (TfL).</p> <p>The application seeks:</p> <p>Demolition of all existing buildings comprising Selby Centre and the erection of four buildings. New buildings to comprise of residential accommodation (Use Class C3); and ancillary commercial accommodation (Use Class E (a), (b), & (g)). With car and cycle parking; new vehicle, pedestrian, and cycle routes; new public, communal, and private amenity space and landscaping; and all associated plant and servicing infrastructure.</p> <p>I have responded separately to Enfield Council in relation to the application within their LPA area. The response below assesses some items, such as overall trip generation and Active Travel Zone together, and their mitigation, but some items such as car and cycle parking are assessed depending on the nature of the proposal.</p> <p>Site description and context</p> <p>The nearest part of the Transport for London Road Network (TLRN) is the A10 Bruce Grove which is accessed 750m to the west and the nearest part of the Strategic Road Network (SRN) is Tottenham High Road which is accessed approximately 900m to the east. Cycleway 1 is located along Bull Road immediately to the east of the site. There is a local Controlled Parking Zone, Tottenham Event Day, with controls Monday – Friday 1700-2030 and Saturday, Sunday and Public Holidays 1200-2000.</p> <p>There are two bus services in the vicinity of the site and White Hart Lane station is approximately 700m from the south of the site, served by London Overground.</p>	<p>Conditions and informatives attached and obligations secured where reasonable and necessary.</p>

Stakeholder	Comment	Response
	<p>The Public Transport Accessibility Level (PTAL) is rated between 1b-3 on a scale of 0-6, and with a PTAL rating of 3 in the location of the proposed residential units.</p> <p>Trip generation and impact</p> <p>It is estimated that there will be a net impact for the entire development of 761 two way trips across a weekday from 0700-1900, and within the AM peak hour an increase of 122 and within the PM peak hour an increase of 54 trips. There are the most significant net increases for pedestrians, National Rail and bus trips. There has not been an assessment of late evening or weekend off peak, where it could reasonably be assumed that there would be an increase in leisure trips to the enhanced facilities, where active travel should be promoted. There is unlikely to be a significant impact on the London Overground or National Rail networks to require mitigation.</p> <p>There is an increase in bus use of 22 trips in the AM peak, and while this would not require improvements to bus frequency, there is the opportunity to formalise bus stops instead of the existing Hail and Ride sections which TfL will wish to explore with Haringey and Enfield officers, to provide a more defined location especially for leisure users in off peak hours and hours of darkness and as part of the other requirements for site access, and footway improvements and recognising that providing fixed bus stops may potentially require removing on-street car parking. A contribution towards delivery of bus infrastructure may need to be secured.</p> <p>Active Travel Zone assessment</p> <p>The Transport Assessment includes an Active Travel Zone (ATZ) assessment which is welcomed. This was carried out in daytime hours, and it does not appear that there is any survey or commentary on conditions in night time / dark hours, which may be relevant in particular for evening leisure and community uses across the whole site.</p> <p>TfL is committed to improving women's safety and delivering the Mayor's Strategy to Reduce Violence Against Women and Girls. For information on the issue, TfL also recommends the newly published GLA guidance: Safety in Public Space; Women, Girls and Gender Diverse People.</p> <p>The scheme design creates improved pedestrian connections within and across the site, which is welcomed, and any highway improvements for pedestrian, cycle and vehicular access will need to be secured through a Section 278 agreement.</p> <p>The Transport Assessment includes an Active Travel Zone (ATZ) assessment which is welcomed although all but one of the routes assess routes to the east, and the creation of a new connection to Weir Hall Road to the west should be complemented by improvement to local highways and public realm. and connections to Cycleway 1 to the south.</p>	

Stakeholder	Comment	Response
	<p>Haringey and Enfield Councils are therefore urged to secure such improvements through an appropriate mechanism.</p> <p>Cycle parking</p> <p>Within this Haringey application area is residential cycle parking and some parking for the Selby Centre and leisure uses. The proposal is for 382 long stay and 7 short stay spaces and although this would meet the minimum standards required by London Plan Policy T5 in numerical terms, although there are some design points which will need to be clarified and addressed.</p> <p>The designs for cycle parking for the plots are a combination of secure stores, unit, ground floor, stores in public realm.</p> <p>The stores in the public realm include for oversized / accessible bicycles which is welcomed</p> <p>Some of the individual dwellings have stores which appear to be designed for one bicycle only, and it will need to be confirmed that these spaces will be laid out and retained permanently for cycle storage only.</p> <p>For the communal stores, there appears to be enough space for two tier racks to be accessed, and there is also provision of oversized spaces, however many of the doors to the public realm are 1.0m wide, and a minimum door width of 2.0m in line with London Cycle Design Standards should be provided.</p> 	

Stakeholder	Comment	Response
	<p><u>Short stay and leisure parking</u></p> <p>Part of the Haringey redline includes access paths into the site and towards the Selby centre and park and leisure uses, which include what appear to be standard sized Sheffield stands. We will strongly encourage a mix of different types of cycle parking, including children's bicycles and scooters. The cost would be low and there are no major space constraints. Indeed, without adequate provision scooters and bikes are much more likely to be left in inappropriate places blocking pedestrian or other access and being an obstacle to lose with visual impairment or other disabilities.</p> <p>All details of long stay and short stay cycle spaces should be secured by condition to ensure that cycle parking complies with TfL's London Cycling Design Standards (LCDS) guidance and in accordance with London Plan Policy T5.B.</p> <p>Car Parking</p> <p>The TA for the whole site sets out some different figures for the number of existing parking spaces on the whole site, where it appears that 143 car parking spaces are available within the site. The overall quantum of parking is proposed to be reduced from the existing which is welcomed, though there will need to be some clarification and justification of some matters.</p> <p>The residential element is car-free, with 21 disabled persons spaces, which is supported, so that every accessible unit will have access to one car parking space in line with London Plan. Residents of the site should be prevented from obtaining on-street car parking permits, secured by an appropriate planning mechanism.</p> <p>A car club space should be secured with membership for three years for residents, which may assist with demand for vehicles for family dwellings.</p> <p>The proposal for nine spaces in the Haringey boundary for the Selby Centre (where the building is in the Enfield / Outer London standards application area) but needs to be assessed in line with Haringey / Inner London standards application area) needs to be justified for the nature of land uses here. It is understood that the nine spaces would be within a secure area and managed and controlled by the Selby Centre.</p> <p>There are 60 spaces, including 10 disabled persons spaces, proposed for the sports fields and centre within the Enfield application redline where the Enfield TA assesses that the demand could peak at 100 spaces. These 60 spaces are due to be managed by Haringey Council to collect charges, and it will need to be clarified how this can be secured through an appropriate legal mechanism for Haringey to</p>	

Stakeholder	Comment	Response
	<p>manage and enforce, as a measure to control demand for vehicle trip generation, and without having any significant impact on on-street parking.</p> <p>The amount of active and passive electric vehicle charging points for all uses will need to be clarified and to be provided in line with the London Plan.</p> <p>A Car Parking Management Plan (or multiple plans for the relevant uses) will be required to manage and enforce the spaces.</p> <p>Deliveries and Servicing and Waste Management</p> <p>A draft Delivery and Servicing Plan (DSP) and an Operational Waste Management Plan is part of the submission,</p> <p>The final DSP and Waste Management Plan should be secured by planning condition, and traffic management order for the hours of operation of the loading bay.</p> <p>Construction</p> <p>The TA includes an Outline Construction Logistics Plan (CLP) which sets out how proposals are expected to be managed, with consultation with all users of the site, and restricting hours of deliveries to avoid local network peaks. It sets out the key measures for a commitment to meet CLOCS / FORS accreditation, use of a delivery scheduling system, and designated construction traffic routes ensuring all HGVs use appropriate strategic roads, which is welcomed.</p> <p>There should also be time limits to control when there are major events at Tottenham Hotspur stadium which require road closures and which can affect the performance of the local highway network. TfL also support the potential use of cargo bikes for delivery of materials.</p> <p>A full CLP and Construction Management Plan (CMP) will ultimately need to be secured by condition all produced in accordance with TfL best practice guidance.</p> <p>Travel Plan</p> <p>A framework Travel Plan (TP) has been submitted, and which given the amount of car parking on site sets targets to reduce car driver trips, and increase cycle and walking trips.</p> <p>It is welcomed that the Travel Plan co-ordinator will be appointed to liaise with the Assistant Director of Planning, Building Standards & Sustainability in the submission and agreement of the Travel Plan and to be responsible for promoting the Travel Plan to Occupiers of the Development.</p>	

Stakeholder	Comment	Response
	<p>The applicant should implement comprehensive measures to promote and maintain cycling, especially due to the proximity of Cycleway 1 and the leisure uses on site. We also recommend that the applicant provides a staff travel plan for the construction of the development.</p> <p>The Travel Plan should be secured, implemented and monitored as part of any Section 106 agreement.</p> <p>Summary</p> <p>TfL has no significant objections to the principle of the proposed development however further work is required in relation to the following:</p> <ul style="list-style-type: none"> • Clarifying with Haringey Council and Enfield Council the potential for creating fixed bus stops on streets in the vicinity of the site • Clarifying provision for the Selby Centre nine car parking spaces in line with London Plan standards • Access and layout to cycle parking <p>Appropriate S106 obligations should be included in Heads of Terms:</p> <ul style="list-style-type: none"> • A potential contribution to fixed bus stops – to be discussed with TfL and Haringey Council and Enfield Council • Other highways agreements for new or amended access points – to be secured with Haringey Council and Enfield Council • A contribution to Active Travel Zone and Healthy Streets measures – to be agreed with Haringey Council and Enfield Council • Travel Plan • Restricting occupiers applying for parking permits • Car club membership <p>Conditions should be secured for:</p> <ul style="list-style-type: none"> • Car and Cycle Parking and Design Management Plan, disabled persons and EVCP provision • Details of long stay and short stay cycle parking and facilities • Delivery and Servicing Plan • Waste Management Plan • Full Construction Logistics Plan and Construction Management Plan 	

Stakeholder	Comment	Response
UK Power Networks (UKPN)	Please be advised, as customer has accepted our quote for a diversion of equipment in the proposed area, my company would like to remove the objection comment previously made on this application.	Noted.