

REPORT FOR CONSIDERATION AT PLANNING SUB-COMMITTEE

1. APPLICATION DETAILS

Reference No: HGY/2024/1456

Ward: Tottenham Central

Address: 30-48 Lawrence Road, Tottenham, London, N15 4EG

Proposal: Alterations and extension to existing building (Class E) and erection of residential building (Class C3- Dwellinghouses) including ground floor commercial (Class E - Commercial, Business and Service), cycle and car parking, hard and soft landscaping, and all other associated works.

Proposed: 56 residential units (25 x 1 bedroom, 22 x 2 bedroom, and 9 x 3 bedroom).

Commercial floorspace

Existing: 1,834 sqm

Proposed: 1,050 sqm (revised)

Applicant: CNF Properties London Limited

Ownership: Private

Case Officer Contact: Gareth Prosser

Date received: 21/05/2024

1.1 The application has been referred to the Planning Sub-Committee for decision as it is a major application.

1.2 SUMMARY OF KEY REASONS FOR RECOMMENDATION

- The site is within an established neighbourhood with good access to public transport and existing neighbourhood facilities, where planning policy expects additional housing at a greater density than existing. This is subject to a design-led approach to the development of the site, which was carried out here to maximise the opportunities and location of the site to bring forward 56 new homes. In land-use terms, the proposal is strongly supported in principle.
- The development retains 1,050 sqm (GIA) of commercial use (Class E) on site. This comprises of four new units fronting Lawrence Road totalling 146 sqm, with the remaining 904 sqm (GIA) being the partial retention of the existing commercial building to the rear of the site. In total, the commercial element on site would be reduced from 1834sqm to 1050sqm; a net loss of 784sqm (approx. 42.75%).

- The development would be of a high-quality design which responds appropriately to the local context.
- Proposed Development seeks to deliver 19% affordable housing (by habitable room) which is the maximum viable amount, wholly in shared ownership tenure.
- The existing London Plane trees along Lawrence Road are to be retained. Six new trees are proposed on-site within a new ground floor courtyard and 4 street trees are secured off-site via condition, ensuring no net loss of trees on or around the site.
- The size, mix, tenure, and quality of accommodation are acceptable and either meet or exceed relevant planning policy standards. All flats have external amenity space.
- The proposal has been designed to avoid any material harm to neighbouring amenity in terms of a loss of sunlight and daylight, outlook, or privacy, in terms of excessive noise, light or air pollution.
- The proposed development is car free (except for 5 wheelchair-accessible spaces) and high-quality storage for cycles is provided. The site's location is accessible in terms of public transport routes and the scheme is also supported by sustainable transport initiatives.
- High performance energy saving measures form part of the proposal, which would also include air source heat pumps and photo-voltaic panels.
- The proposal would have a negligible impact on the historic built environment, which is considered acceptable when it is weighted against the public benefits of the proposal.
- 113sqm of children's play space proposed (10sqm/ child) provided as part of an overall communal amenity area of 465sqm.
- The proposed development will secure several planning obligations including financial contributions to mitigate the residual impacts of the development.

2. RECOMMENDATION

- 2.1 That the Committee authorise the Interim Head of Development Management & Planning Enforcement or the Assistant Director of Planning, Building Standards & Sustainability to **GRANT planning permission** subject to the conditions and informatives set out below and the completion of an agreement satisfactory to the Interim Head of Development Management & Planning Enforcement or the Assistant Director of Planning, Building Standards & Sustainability that secures the obligations set out in the Heads of Terms below.
- 2.2 That delegated authority be granted to the Interim Head of Development Management & Planning Enforcement or the Assistant Director Planning, Building Standards and Sustainability to make any alterations, additions or deletions to the recommended measures and/or recommended conditions as set out in this report and to further delegate this power provided this authority shall be exercised in consultation with the Chair (or in their absence the Vice-Chair) of the Sub-Committee.

- 2.3 That the agreement referred to in resolution (2.1) above is to be completed no later than 31st May 2025 within such extended time as the Head of Development Management & Planning Enforcement or the Assistant Director of Planning & Building Standards shall in her/his sole discretion allow; and
- 2.4 That, following completion of the agreement(s) referred to in resolution (2.1) within the time period provided for in resolution (2.3) above, planning permission be granted in accordance with the Planning Application subject to the attachment of the conditions.
- 2.9 Summary of the planning obligations for the development is provided below:
1. Carbon offset contribution:
 - Estimated carbon offset contribution of £36,480 (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;
 - 'Be Seen' commitment to upload energy performance data;
 - Energy Plan; and
 - Sustainability Review.
 2. Car-Free Agreement including a £4,000 contribution to amend the Traffic Management Order.
 3. Car Club Membership Subsidies at £100 (one hundred pounds in credit) per year/per unit for the first 2 years.
 4. Commercial Travel Plan including £2,000 per year per Travel Plan for monitoring of the travel plan for a period of 5 years.
 5. Residential Travel Plans including a £15,000 to monitoring of the travel plan initiatives.
 6. Highway Improvements
 7. Employment Initiatives - participation and financial contribution towards Local training and Employment Plan.
 - Apprenticeship support fees of £1,500;
 - Provide a support fee of £1,500 per apprenticeship towards recruitment costs;
 - 5% of the on-site workforce to be Haringey resident trainees;
 - Submission of an employment and skills plan;
 - No less than 20% of local labour. Residents shall be employed for a minimum of 26 weeks; and
 - One full time apprenticeship per £3mill of development cost (up to max. 10% of total construction workforce).
 8. Monitoring Contribution
 - 5% of total value contribution (not including monitoring);

- £500 per non-financial contribution; and
 - Total monitoring contribution to not exceed £50,000.
9. Construction Management Travel Plan obligation for £15,000.
10. Retention of Architect

2.10 Summary Lists of Conditions and Informatives

Summary of Conditions (the full text of the recommended conditions can be found in Appendix 1 of this report).

Conditions

- 1) Time Limit
- 2) Approved Plans
- 3) Materials and design detail
- 4) Energy Strategy
- 5) Overheating – Residential
- 6) Overheating - non-residential
- 7) Living roofs and walls
- 8) Delivery and Servicing Plan and Waste Management
- 9) Cycle Parking
- 10) Electric Vehicle Charging
- 11) Disabled parking bays
- 12) Car Parking Management
- 13) Thames Water
- 14) Land Contamination
- 15) Unexpected Contamination (Pollution)
- 16) NRMM (Pollution)
- 17) Construction Environmental Management Plans (Pollution)
- 18) Waste
- 19) Secured by Design
- 20) Secured by Design
- 21) Trees
- 22) Landscaping
- 23) Surface Water Drainage
- 24) Surface Water Drainage
- 25) Part M
- 26) Energy
- 27) Trees
- 28) Gates

Informatives

- 1) NPPF
- 2) CIL
- 3) Hours of Construction Work
- 4) Party Wall Act
- 5) Street numbering

- 6) Thames Water
- 7) Thames Water
- 8) Thames Water
- 9) Thames Water
- 10) Pollution
- 11) Secured by Design

2.11 In the event that members choose to make a decision contrary to officers' recommendation, members will need to state their reasons.

2.12 In the absence of the agreement referred to in resolution (2.1) above being completed within the agreed time period, set out in (2.3) provided for in resolution (2.1) above, the planning permission be refused for the following reasons:

- i) The proposed development, in the absence of a legal agreement securing the provision of 1) on-site affordable housing and 2) viability review mechanisms the proposals would fail to foster a mixed and balanced neighbourhood where people choose to live, and which meet the housing aspirations of Haringey's residents. As such, the proposals would be contrary to London Plan Policies GG1, H4, H5 and H6, Strategic Policy SP2, and DM DPD Policies DM11 and DM13, and Policy TH12.
- ii) The proposed development, in the absence of a legal agreement securing residential and commercial Travel Plans and financial contributions toward travel plan monitoring, 2) Traffic Management Order (TMO) amendments to change car parking control measures, 3) and car club contributions 4) Highway improvements, the proposals would have an unacceptable impact on the safe operation of the highway network and give rise to overspill parking impacts and unsustainable modes of travel. As such, the proposal would be contrary to London Plan Policies T1, T2, T3, T4, T5 and T6. Spatial Policy SP7, Tottenham Area Action Plan Policy SS2 and DM DPD Policy DM31.
- iii) In the absence of an Employment and Skills Plan the proposals would fail to ensure that Haringey residents benefit from growth and regeneration. As such, the proposal would be contrary to London Plan Policy E11 and DM DPD Policy DM40.
- iv) In the absence of a legal agreement securing the implementation of an energy strategy and carbon offset payments the proposals would fail to mitigate the impacts of climate change. As such, the proposal would be unsustainable and contrary to London Plan Policy SI 2 and Strategic Policy SP4, and DM DPD Policies DM 21, DM22 and DM48.
- v) In the absence of a legal agreement securing the developer's participation in the Considerate Constructor Scheme and the borough's Construction Partnership, the proposals would fail to mitigate the impacts of demolition and construction and impinge the amenity of adjoining occupiers. As such the proposal would be contrary to London Plan Policies D14, Policy SP11 and Policy DM1.

- 2.13 In the event that the Planning Application is refused for the reasons set out in resolution (2.11) above, the Head of Development Management (in consultation with the Chair of Planning Sub-Committee) is hereby authorised to approve any further Planning Sub-Committee Report application for planning permission which duplicates the Planning Application, provided that: i. There has not been any material change in circumstances in the relevant planning considerations, and ii. The further application for planning permission is submitted to and approved by the Assistant Director within a period of not more than 12 months from the date of the said refusal, and iii. The relevant parties shall have previously entered into the agreement contemplated in resolution (1) above to secure the obligations specified therein

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3. PROPOSED DEVELOPMENT AND LOCATION DETAILS

3.1 Proposed development

3.1.1. This is an application for:

- Partial demolition and refurbishment of existing light industrial building (Class E);
- Erection of a 7-storey building consisting of 56 residential units (Class C3); comprising 25 x 1 bed, 22 x 2 bed, 9 x 3 bed units;
- 1055 square meters of Commercial (Class E) on the ground floor;

- Cycle parking and refuse storage;
 - Hard and soft landscaping; and
 - Disabled Parking Bays.
- 3.1.2. The proposed 56 homes are contained within a 7-storey building forming a linear block of development along Lawrence Road with primary access for both the residential and commercial aspects located within the primary frontage.
- 3.1.3. The proposal includes cycle parking (103 long-stay cycle parking spaces and 23 short-stay cycle spaced for residents and 8 long-stay cycle parking and 2 short-stay cycle parking spaces for the commercial element). Refuse/recycling storage facilities are also provided.
- 3.1.4. The proposal includes photo-voltaic panels on the roof level of the partially retained commercial unit. Green roofs are included on the residential roof spaces
- 3.1.5. Five off-street wheelchair accessible car parking spaces with electric charging points would be provided.
- 3.1.6. Existing London Plane trees along Lawrence Road to be retained.
- 3.1.7. Following deferral of the case, at Officers' request, from the Planning Sub-Committee meeting of November 7th, 2024, given the Health and Safety Executive's (HSE) position on the proposal, the scheme has been revised in response to comments received by the HSE regarding Fire Safety. The revisions to ground and first floor levels include the following:
- Changes to rear elevation of the residential building (ground and first floors),
 - Reduced commercial unit, additional landscaping, trees and an enhanced entrance to the commercial building.
 - Open-air parking within new central courtyard (Ground Floor).
 - Communal deck reduced in scale (First Floor)
 - Car and cycle parking
- 3.1.8. The relevant parts of the report have been updated to reflect the current scheme.

Site and Surroundings

- 3.1.9. The site at 30-48 Lawrence Road is currently occupied by a large, light-Industrial building, which operates as a dry-cleaning business, with associated car parking that is located behind metal fencing. The site neighbours several, existing mixed-use developments on Lawrence Road, with some sites under construction.
- 3.1.10. The Clyde Circus Conservation Area borders the site to the east, incorporating Collingwood Road to the rear of the site. However, the site is not located within the conservation area and no statutory or locally listed buildings are located on site.
- 3.1.11. The site falls within Site Allocation SS2 'Lawrence Road', as identified in the Tottenham Area Action Plan. The West Green Road / Seven Sisters District Centre is located to the south-east of the site, just outside the Site Allocation. The surrounding area consists of a range of mixed residential and commercial land uses including, Victorian terraced

houses, blocks of flats and commercial buildings on Lawrence Road, alongside the recent developments at 50-56 Lawrence Road on the eastern side of the road and the Bellway development at the southern end of the road. Opposite, the sites under construction are 45-63 Lawrence Road and 67 Lawrence Road.

- 3.1.12. The site is located within the Seven Sisters CPZ, which operates Monday to Saturday from 0800 - 1830. The site has a Public Transport Accessibility Level (PTAL) of 3, which is considered to have 'moderate' access to public transport services. 3 bus services are within 3 to 4 minutes' walk of the site, and Seven Sisters Railway station is a 10-minute walk away.

3.2 Relevant Planning and Enforcement history

There is no relevant history on site. However, the following planning history on neighbouring sites on Lawrence Road are considered relevant to this proposal.

- HGY/2012/1983 - Land at Lawrence Road Demolition of existing buildings and erection of seven buildings extending up to seven storeys to provide 264 new residential dwellings, 500 sqm of flexible commercial/retail floorspace (A1/ A2/A3/D2 uses) with associated car parking, landscaping and infrastructure works. **Approved** 11.01.2013
- HGY/2016/2824 - 50-56 Lawrence Road (Mono house) Demolition of the existing buildings and redevelopment of the site to provide a 7 storey building fronting Lawrence Road and a part 5, 3 and 2 storey building which forms an intermediate block and mews to the rear comprising 47 residential units (use class C3) and 176sqm of commercial floor space (use class B1) on ground floor, including 8 car parking spaces and associated landscaping and cycle parking. **Approved** 26.05.2017
- HGY/2016/1212 - 45-63 Lawrence Road Demolition of the existing buildings and redevelopment of the site to provide a 7-storey building fronting Lawrence Road which includes a recessed top floor and four storey mews block to the rear, comprising 69 residential units (use class C3) and seven live work units on ground and first floor level, including 7 disabled parking spaces and associated works (Revised parking and landscaping arrangement). **Approved** 17.01.2018
- HGY/2016/1213 - 45-63 Lawrence Road Demolition of the existing buildings and redevelopment of the site to provide a building ranging from 4 to 7 storeys in height which includes a recessed top floor comprising 80 residential units (use class C3) and 566sqm of commercial floor space (Use class B1/A2) on ground and first floor level, including 8 disabled parking spaces, 1 car club space including associated works.' **Approved** 17.01.2018
- Formal pre-application engagement has been undertaken with the Local Planning Authority (LPA).

4. CONSULTATION RESPONSE

4.1 Quality Review Panel

- 4.1.1 The scheme has been presented to Haringey Quality Review Panel on three occasions.

- 4.1.2 Following the Quality Review Panel meeting in February 2024, the Panel states (in, Appendix 4) that the proposals have progressed well and supports them, subject to detailed comments on massing, architecture, layout and amenity space with the summary from the report below:
- 4.1.3 The panel thinks that the architecture is developing well and makes only detailed comments. It encourages variation in the spacing of balcony railings. It also encourages the use of more decoration in the western element of the residential building, and of subtle variations in colour for balconies and window frames, with lighter tones for the rear façade. Material colours should be conditions. The decision to raise the roof of the existing warehouse could be reconsidered but, if implemented, should be moved further from neighbours.
- 4.1.4 The panel suggests rotating the northern core to give residents direct access from the street and simplify security arrangements. Regardless, the quality of the passageway along the northern boundary is important and should be conditioned in any planning permission. The panel is pleased to see the addition of rooftop and sixth-floor amenity space. It thinks children's play should be located in the first-floor space, with upper spaces managed to avoid unsupervised child use. Screens should be considered to raise parapet heights. Defensible space is needed for first floor rooms overlooking the shared terrace. Daylight and sunlight analysis is needed to show what conditions will be like on the first-floor terrace.
- 4.1.5 Residential layouts are much improved, but the panel thinks the northernmost one-bedroom flats are too cramped and should be rethought, possibly as studios. Oversized flats are suited for use as wheelchair accessible units. Care should be taken to avoid overlooking from flats closest to the Vabel Building. First floor balconies should be increased in size to protect flats from service yard nuisance, and a management plan is needed to minimise disruption to residents. The panel supports the overall sustainability ambitions but asks for reassurance that top floor flats will not overheat in the absence of solar shading.
- 4.1.6 A table of comments by the Panel and the response of the applicant is set out in 'Impact on The Character and Appearance' section of this report.

4.2 Development Management Forum

- 4.2.1 A Development Management Forum was held on February 26th, 2024.

4.3 Planning Committee Pre-Application Briefing

- 4.3.1 A Committee Pre-Application Briefing took place on March 7th, 2024.

4.4 Application Consultation

- 4.4.1 The following responses were received:

Internal:

- 1) Carbon Management: No objection, following revisions, subject to conditions.

- 2) Pollution: No objection, subject to conditions.
- 3) Trees: No objection, following revisions, subject to conditions.
- 4) Transportation: No objections, subject to conditions, S.106 and S.278 obligations.
- 5) LBH Design: Support, subject to conditions.
- 6) LBH Conservation Officer: No objection raised.
- 7) LBH Waste: No objection raised.
- 8) LBH Drainage: No objections, subject to conditions.
- 9) LBH Inclusive Economy: No objections, contributions recommended.

External:

- 10) Thames Water: No objection, subject to conditions.
- 11) London Fire Brigade: No comments received.
- 12) Metropolitan Police Designing Out Crime Officer: No objections, subject to condition.
- 13) Health and Safety Executive: A concern raised, but no comments received on revisions to date.

5. LOCAL REPRESENTATIONS

5.1 The following were consulted:

- 807 Neighbouring properties
- Clyde Circus Residents Association (RA)
- Tottenham Conservation Area Advisory Committee (CAAC)
- 8 site notices were erected close to the site

5.2 The number of representations received from neighbours, local groups etc in response to notification and publicity of the application were as follows:

No of individual responses: 13

Objecting: 12

Support: 1

5.3 The following local groups/societies made representations:

- None

5.4 The following Councillor made representations:

- None

- 5.5 The issues raised in representations that are material to the determination of the application are set out in Appendix 1 and summarised as follows:

Objections

- Building too high/overbearing
- Loss of daylight/sunlight to nearby properties
- Overlooking/Loss of privacy
- Subsidence/Cracking to existing houses along Collingdale
- Increased noise and disruption
- Overdevelopment
- Loss of privacy (to 28 Lawrence Road)
- Insufficient social/affordable housing
- The rear flats of level 4 - 7 will directly overlook the gardens and windows of Collingwood Road residential properties. These should be amended to face the front of the street
- New facilities will not be available wider local community
- Disruption from construction works

Support

- Proposal will improve the streetscape and reduce pollution
- New commercial units will improve existing 'barren' frontage

- 5.6 The following issues raised are not material planning considerations:

- Impact on property values (**Officer Comment:** This is a private matter and therefore not a material planning consideration).
- Inadequate consultation (**Officer Comment:** The LPA sent letters to 800 addresses, displayed 8 site notices in the vicinity of the site and has undertaken a Development Forum. In addition, the applicant has also undertaken a community engagement workshop).
- Loss of private views (**Officer comment:** Private views are not a material consideration and cannot be considered in this assessment).

6. MATERIAL PLANNING CONSIDERATIONS

Statutory Framework

- 6.1 Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires planning applications to be determined in accordance with the statutory Development Plan unless material considerations indicate otherwise.

- 6.1.1 The main planning issues raised by the proposed development are:

1. Principle of the development;
1. Design and impact on the character and appearance of the surrounding area;
2. Character and appearance of the conservation area;
3. The impact on the amenity of adjoining occupiers;

4. Landscape and Biodiversity;
5. Housing Mix, Tenure and Quality of Accommodation;
6. Parking and highway safety/ waste recycling and servicing;
7. Sustainability, Energy and Climate Change;
8. Crime Prevention;
9. Flood risk & Drainage;
10. Air quality;
11. Land contamination;
12. Employment and Skills;
13. Trees; and
14. Fire Safety

6.2 Principle of the development

National Policy

- 6.2.1 The 2023 National Planning Policy Framework (NPPF) establishes the overarching principles of the planning system, including the requirement of the system to “drive and support development” through the local development plan process. It advocates policy that seeks to significantly boost the supply of housing and requires local planning authorities to ensure their Local Plan meets the full, objectively assessed housing needs for market and affordable housing.
- 6.2.2 The National Planning Policy Framework (NPPF) was last updated in December 2024. This version of the National Planning Policy Framework was amended on 7 February 2025 to correct cross-references from footnotes 7 and 8 and amend the end of the first sentence of paragraph 155 to make its intent clear. For the avoidance of doubt the amendment to paragraph 155 is not intended to constitute a change to the policy set out in the Framework as published on 12 December 2024.

Regional Policy - the London Plan

- 6.2.3 The London Plan (2021) Table 4.1 sets out housing targets for London over the coming decade, setting a 10-year housing target (2019/20 - 2028/29) for Haringey of 15,920, equating to 1,592 dwellings per annum.
- 6.2.4 London Plan Policy H1 ‘Increasing housing supply’ states that boroughs should optimise the potential for housing delivery on all suitable and available brownfield sites, especially sites with existing or planned public transport accessibility levels (PTALs) 3-6 or which are located within 800m of a station or town centre boundary.
- 6.2.5 London Plan Policy D6 seeks to optimise the potential of sites, having regard to local context, design principles, public transport accessibility and capacity of existing and future transport services. It emphasises the need for good housing quality which meets relevant standards of accommodation.

Local Policy

- 6.2.6 The Haringey Local Plan Strategic Policies DPD (hereafter referred to as Local Plan), 2017, sets out the long-term vision of the development of Haringey by 2026 and sets out the Council’s spatial strategy for achieving that vision.

- 6.2.7 Local Plan Policy SP2 states that the Council will aim to provide homes to meet Haringey's housing needs and to make the full use of Haringey's capacity for housing by maximising the supply of additional housing to meet and exceed the minimum target including securing the provision of affordable housing.
- 6.2.8 The Development Management DPD (2017) (hereafter referred to as the DM DPD) is particularly relevant. Policy DM10 seeks to increase housing supply and seeks to optimise housing capacity on individual sites such as this. Policy DM10 (A) states the Council will support proposals for new housing on sites allocated for residential development, including mixed-use residential development, within the Site Allocations DPD and Area Action Plans.
- 6.2.9 Policy DM40: Non-Designated Employment Land and Floorspace states that on non-designated employment sites within highly accessible or otherwise sustainable locations, the Council will support proposals for mixed-use, employment-led development where this is necessary to facilitate the renewal and regeneration (including intensification) of existing employment land and floorspace. All proposals for mixed-use development must satisfy the requirements of Policy DM38.
- 6.2.10 Policy DM38 Local Employment Area - Regeneration Areas, states that proposals must maximise the amount of employment floorspace to be provided within the mixed-use scheme, provide demonstrable improvements in the site's suitability for continued employment and business use, as well as ensure an appropriate standard of amenity for the development's users and neighbours, particularly where new residential floorspace is introduced as part of a mixed-use scheme. Any proposal should not conflict with or inhibit the continued employment function of the site and nearby employment sites.
- 6.2.11 The site forms part of Site Allocation SS2: 'Lawrence Road' as designated in the Council's Tottenham Area Action Plan (TAAP). The Allocation seeks the redevelopment of the site with a mixed-use development with commercial uses at ground floor level and residential above.
- 6.2.12 The requirements for the site, as set out under SS2 of the TAAP include the following;
- Development proposals will be required to be accompanied by a site-wide masterplan showing how the land included meets this policy and does not compromise coordinated development on the other land parcels within the allocation.
 - Re-provision of employment floorspace at ground floor level along Lawrence Road, with residential development above.
 - Proposals responding to the scale of the terraced housing prevailing in the Clyde Circus Conservation Area to the east and west will be supported.
 - The junction adjacent to the existing linear park to the north of the site should be reconfigured to reflect Clyde Road as part of the Mayor of London's Quietway cycle network.

- Development must be designed in a way that responds to the designated open space at the land linking Elizabeth Place and Clyde Circus to the north of the site.
- An assessment of the impact on the existing traveler site on Clyde Road should be undertaken for any adjacent or closely proximate development proposals.
- Existing good quality stock, notably 28 Lawrence Road, which can continue to meet the needs of contemporary commercial uses, should be preserved as part of a more comprehensive development.
- The existing street trees are a strong asset to the streetscape and should be preserved.
- This site is identified as being in an area with potential for being part of a Decentralised Energy (DE) network. Development proposals should be designed for connection to a DE network, and seek to prioritise/secure connection to existing or planned future DE networks, in line with Policy DM22.

6.2.13 The Council at the present time is unable to fully evidence its five-year supply of housing land. The 'presumption in favour of sustainable development' and paragraph 11(d) of the NPPF should be treated as a material consideration when determining this application, which for decision-taking means granting permission unless the application of policies in the NPPF that protect areas or assets of particular importance provides a clear reason for refusal or any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in the NPPF taken as a whole. Nevertheless, decisions must still be made in accordance with the development plan (relevant policies summarised in this report) unless material considerations indicate otherwise (of which the NPPF is a significant material consideration).

Assessment

6.2.14 Masterplanning and Site Allocation

Policy DM55 of the DMDPD states that, where developments form only a part of allocated sites, a masterplan shall be prepared to demonstrate the delivery of the site allocation, in this case SS2. The site is one of the last pieces of land undeveloped within the site allocation, with the redevelopment of the allocated land largely complete or nearing completion. The neighbouring building to the north (No. 28) is to be retained within the site allocation. As such, the wider area objectives would not be frustrated by the proposal.

6.2.15 The redevelopment of this site for new homes will contribute to the Borough's housing target for the period from 2015-2026 in accordance with Strategic Policy 2. In addition, the retention of significant commercial use on the site ensures a diverse, mixed-use residential development within the Site Allocations.

6.2.16 The proposed development has been designed to optimise the delivery of high-quality homes and spaces and to enhance the local environment having regard to neighbouring residential amenity and the character and appearance of the surrounding area. The land at 30-48 Lawrence Road, Tottenham is a brownfield location, close to sustainable

transport connections in an established residential area and the principle of residential use in this location is supported by national, regional and local policy, which identify housing as a strategic need.

Loss of commercial space

- 6.2.17 The proposed development retains a significant quantum of commercial (Class E) on site, with the existing unit being reduced and new commercial floorspace created within the new development. The proposed commercial floorspace would comprise 4 new units fronting Lawrence Road (146sqm), in addition to 904sqm retained of the existing unit. In total, the commercial element on site would be reduced from 1834sqm to 1050sqm; a net loss of 779sqm (approx. 42.75%). However, some of this loss results from the removal of the existing plant building and ancillary office space to the front of the building.
- 6.2.18 Whilst there is an overall loss of commercial space, on balance, this is considered acceptable, with much of the existing building retained, reused and improved. The remaining unit will be refurbished and enhanced including new rooflights and a roof extension above the central area of the structure to allow glazing to improve the quality of daylight within the repurposed building. Overall, given the improved quality of the commercial floorspace, its more preferable distribution across the site (specifically the creation of an active ground floor frontage) and the diversification of uses on site, the loss of commercial space is considered justified, with much improved quality commercial space in relation to the existing building on the site. Officers consider the proposal a more effective use of the site in terms of land use.
- 6.2.19 As such, the principle of new mixed-use development comprising residential accommodation, whilst retaining commercial uses on the site is considered acceptable subject to all other material considerations.

6.3 Design and Impact on The Character and Appearance of The Surrounding Area

National Policy

- 6.3.1 Chapter 12 of the NPPF (2023) states that good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.
- 6.3.2 It states that, amongst other things, planning decisions should ensure that developments function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development and be visually attractive due to good architecture, layouts, and appropriate and effective landscaping.

Regional Policy - London Plan

- 6.3.3 The London Plan (2021) policies emphasise the importance of high-quality design and seek to optimise site capacity through a design-led approach. Policy D4 notes the importance of scrutiny of good design by borough planning, urban design, and conservation officers (where relevant). It emphasises the use of the design review process to assess and inform design options early in the planning process (as taken place here).

- 6.3.4 Policy D6 concerns housing quality and standards and notes the need for greater scrutiny of the physical internal and external building spaces and surroundings as the density of schemes increases due the increased pressures that arise.

Local Policy

- 6.3.5 Policy SP11 of the Haringey Local Plan requires that all new development should enhance and enrich Haringey's built environment and create places and buildings that are high quality, attractive, sustainable, safe and easy to use.
- 6.3.6 Policy DM1 of the DM DPD requires development proposals to meet a range of criteria having regard to several considerations including building heights; forms, the scale and massing prevailing around the site; the urban grain; and a sense of enclosure. It requires all new development to achieve a high standard of design and contribute to the distinctive character and amenity of the local area.

Quality Review Panel (QRP)

- 6.3.7 The development proposal been presented to the QRP three times (including one Chair's Review) prior to the submission of this application. The most recent review took place on 21 February 2024. The Panel's summarising comments of this latest review are provided below.
- 6.3.8 'The panel thinks the proposals have progressed well and supports them, subject to detailed comments on massing, architecture, layout and amenity space'.
- 6.3.9 'The panel thinks that the architecture is developing well and makes only detailed comments. It encourages variation in the spacing of balcony railings. It also encourages the use of more decoration in the western element of the residential building, and of subtle variations in colour for balconies and window frames, with lighter tones for the rear façade. Material colours should be conditions. The decision to raise the roof of the existing warehouse could be reconsidered but, if implemented, should be moved further from neighbours.
- 6.3.10 'The panel suggests rotating the northern core to give residents direct access from the street and simplify security arrangements. Regardless, the quality of the passageway along the northern boundary is important and should be conditioned in any planning permission. The panel is pleased to see the addition of rooftop and sixth-floor amenity space. It thinks children's play should be located in the first-floor space, with upper spaces managed to avoid unsupervised child use. Screens should be considered to raise parapet heights. Defensible space is needed for first floor rooms overlooking the shared terrace. Daylight and sunlight analysis is needed to show what conditions will be like on the first-floor terrace.
- 6.3.11 'Residential layouts are much improved, but the panel thinks the northernmost one-bedroom flats are too cramped and should be rethought, possibly as studios. Oversized flats are suited for use as wheelchair accessible units. Care should be taken to avoid overlooking from flats closest to the Vabel Building. First floor balconies should be increased in size to protect flats from service yard nuisance, and a management plan is needed to minimise disruption to residents. The panel supports the overall sustainability

ambitions but asks for reassurance that top floor flats will not overheat in the absence of solar shading.'

- 6.3.12 'The panel is confident that the applicant can address its comments in discussion with Haringey officers'. The table below outlines the architect's response to Design review panel comments.

Panel Comments	Architect Response
Architecture	
The panel supports the suggestion that the spacing between balcony railings could increase as they ascend the building and encourages the design team to try this out.	This recommendation has been adopted to help increase privacy at lower floors.
The panel suggests that the projecting, western section of the residential building could be differentiated more from the element behind. Using stronger decoration would distinguish the two sections of the building and respond to the character of the neighbouring building at No. 28 Lawrence Road.	This section of elevation has enhanced brick detailing including banding and emphasizing parapets which does respond to No. 28 next door.
The panel also suggests that subtle colour could be introduced for balconies and window frames, to avoid too much black. This is particularly noticeable in the rear elevation of the residential building, where decks and soffits will have a significant impact. A more playful approach is encouraged, looking at lighter colours, particularly for the rear façade.	The applicant decided to keep a consistent colour across the metalwork of the building, but the black has been subdued to a dark grey in light of this comment
Ground floor	
The panel suggests that the northern residential core could be rotated, to provide direct residential access from Lawrence Road, via the western elevation. This would create a clear separation between the commercial and residential areas, making security easier to manage, and would also improve ground floor activation.	<p>The applicant has worked to ensure this is a pleasant space. This includes the entrance being fobbed/secure so that only residents and commercial users have access and to allow Commercial users to use this entrance as pedestrians, limits the central service yard to delivery.</p> <p>The revised submission converts the internal service yard into an outdoor courtyard with new trees and landscaping.</p>

Whether or not this change is made, the nature of the passageway along the north edge of the development needs consideration. It should feel safe and pleasant, and the panel encourages Haringey officers to condition the detailed design for these areas, including surface materials, soffits, and lighting, all of which will be important in creating a positive experience for users.	This is conditioned.
The panel also suggests considering whether rotating the bin stores by ninety degrees and locating them across the southern end of the service yard would be beneficial.	The ground floor has been reconfigured and the revised arrangement of bins and bikes, with resident access from the cores and service access only from the courtyard is satisfactory.
Commercial building	
The panel questions whether the cost of raising the roof of the existing industrial building will deliver proportionate benefits. It suggests reconsidering this approach. If the roof remains at its current height, impact on the first-floor amenity space would be reduced. It could also release budget that could be used to provide more affordable units.	This point is noted however the roof being raised unlocks the space and the quality of daylight provided which makes the commercial unit a much better-quality space.
If the applicant does decide to raise the roof, the panel asks that it is moved further away from the neighbouring houses to the east by at least a bay, to reduce the impact on their properties.	The applicant has moved the raised area away from the residential façade,
Residential layouts	
The panel recommends a detailed study of the potential for overlooking from bedrooms at the south-eastern corner of the residential building. They appear to have a view of the side of neighbouring balconies in the Vabel Building, but more detailed assessment is needed to ensure problems are avoided.	Following the QRP Chair review, the residential layouts were revised throughout the scheme creating a greater distance to the flank wall of the Vabel building, creating both a simpler rear elevation and allowing more south light to penetrate the scheme.
The panel suggests that the northernmost one-bed flats are too narrow, and that other options should be considered. For example, they may work better as generous studio flats, or with a living room and a bedroom alcove.	The 1 bed flats in question are oversized (57sqm and 54sqm) they have full height and, in some cases, full width glazing and large living and bedroom spaces, with generous circulation to the deepest part of the flats.

The panel is concerned that the flats immediately above the service yard entrance will suffer from noise, fumes and nuisance. It suggests that all the first-floor balconies should extend further from the building, as they do on floors above, which would protect these flats and provide more amenity space.	The depths of the first-floor balconies have been increased from 1.6m to 2.6m and also reduced the service yard opening.
The panel also emphasises the need to demonstrate how the service yard will be managed to reduce the impact of vehicle movements on residents, especially early in the morning and late at night.	The service yard is now primarily used and limited to 5 disabled parking bays for residents.
The panel notes that flats at the southern end of the residential building are oversized, and the additional space could be used more effectively. These units would be suitable locations for M4(3) wheelchair user adaptable flats, especially on the first floor where is also be direct access to the terrace amenity space.	Noted. The scheme supports options for providing 10% M4(III) adaptable units as required.
Amenity	
The panel supports the introduction of rooftop amenity space on the top and sixth floors. The potential for these spaces to provide children's play space will be limited. The panel suggests that dedicated, equipped children's play space, if included, should be provided in the first-floor amenity spaces.	The DAS sets out the amenity provision and demonstrates play area for younger children at first floor with communal space on the roof for older children and adults.
A glass screen should be considered for the rooftop spaces to provide a 1500mm high parapet, which would both reduce wind impacts and improved safety for children.	This is included behind the brick parapet.
The panel also notes the need to consider how rooftop amenity spaces are designed and managed, to ensure uses are suitable: adult and supervised children's play, rather than unattended children's play.	The upper floor has no child play equipment, the central area is a pergola covered space and a series of raised beds, encouraging adult residents to grow plants and encourage it to become a community space.
The panel asks for data to show how much daylight and sunlight will reach the first-floor amenity space. Although changes made to the massing will improve conditions, more analysis is required to demonstrate the quality of the space.	A daylight report is included in the submission, which concluded adequate daylight is achieved at first floor amenity. Paragraph 7.46 of the submitted Planning Statement summarises this, noting that 44% of the 1st floor children's playspace at the Proposed Development will receive at least 2 hours of sun-on-ground on 21st March, increasing to

	96% on 21st June. Whilst the playspace will fall marginally below the BRE guidelines, it will receive acceptable levels of direct sunlight throughout the summer months.
The panel strongly supports tenure neutral access to amenity spaces. It suggests the applicant considers locating affordable family units on the first floor, to provide easy access to the first-floor amenity space.	Affordable flats are proposed across several floors, including the first floor but the lift and stair that are used primarily by the affordable flat occupants have access to the first-floor amenity space.
It is important to consider how to mitigate the impact of the first-floor amenity space on the three-bed flat overlooking it. The panel asks for thinking on how a more substantial defensible space can be created, for example using planting, especially outside bedroom windows.	First Floor plans demonstrate the private amenity to these units and a planting schedule will be provided as part of any landscape condition.
Sustainability	
The panel suggests that the design team should revisit the risk of overheating in west-facing, sixth floor flats. As there are no balconies to provide external shading, unlike the floors below, it is important to be confident that conditions will remain comfortable throughout the year.	A Part O assessment has been carried out and forms part of the environmental reports submitted with the application. This assessment concludes that A sample of the 8 expected worst performing top floor and mid-floor residential units have been modelled. The predicted internal temperature was simulated considering all aspects of occupancy, solar gain and predicted internal heat gains. The calculation results show that all tested residential units meet the TM59 thermal comfort overheating criteria using the main TM49 weather file (DSY1) for the 'future near extreme summer', demonstrating that the building is resilient to overheating during its lifetime.

Commercial Unit

- 6.3.13 The existing, light industrial building on site is two storeys in height. The building has no architectural merit and the demolition of the front section of the building is acceptable. The proposal, whilst removing the front section, would extend the unit upwards. This extension has been set back from the edges of the existing roof as requested by officers and the Quality Review Panel, largely for reasons of amenity, however, the reduced roof extension also appears as a second, subordinate tier to the existing warehouse, providing a more modest massing.

- 6.3.14 The addition of sustainability measures such as a green roof and PV panels atop the of the new roof is considered an efficient use of what would otherwise be an unbroken expanse, improving the visual aesthetic of the unit which will be more prominent given the proposed residential units adjacent.

Residential

- 6.3.15 Officers consider the siting, height, massing and scale of the proposed block is acceptable within the site's context and surrounding built form, providing a transition between the contemporary new build units to the south (Vabel development) and the older, Victorian 'Studio 28' building to the north. The proposal matches the height of neighbouring developments, providing consistency along Lawrence Road as set out in Site Allocation SS2. The proposal would continue the established building line and complete the eastern street frontage.
- 6.3.16 The set-back 6th floor reflects the adjoining properties, tapering the massing and reducing the bulk of the building at the top floor level. The split façade design reflects the differing street lines between No28 Lawrence Road to the north and the Vabel building to the south, neatly and seamlessly bridging the gap between the two buildings.
- 6.3.17 Locating commercial (Class E) floorspace at the ground floor level is supported by Officers. The commercial units are designed to be flexible and attractive to a wide variety of tenants. These proposed units would create an active frontage onto Lawrence Road, which will be further animated by two pedestrian entrances to the residential units above.

Character and Materiality

- 6.3.18 The overarching character of Lawrence Road is brick with metal work; this is reflected in the proposed design. The proposed brick colour and texture is similar to the Vabel building to the south, reflecting the red tones along Lawrence Road. The choice of red bricks is both consistent with the wider street scene but also allows No.28, the only period property remaining on Lawrence Road (and the only yellow brick building) to retain its individuality and prominence.
- 6.3.19 Metal window frames match the colour and finish of all metal work across the façade. Vertical metal balustrade spacing is dense at lower floors to provide increased privacy from the street and to avoid residents applying additional coverings such as bamboo. The further up the building, the wider the spacing, up to a maximum of 90mm. The balconies and glazing reflect the vertical rhythm of the design which is established by the colonnade to the base of the proposal and is carried throughout the front façade to the sixth floor above.
- 6.3.20 At first floor, the external façade of the apartments is fully glazed to gain as much light as possible whilst also being recessed to balance overheating. The combination of the recess and the balconies provides protection from the street and commercial uses at ground floor level as recommended by the Quality Review Panel. At the remaining levels, window reveals give depth to the façade, enhanced by subtle detailing including recessed brickwork framing and contrasting banding adding interest, whilst visually breaking the expanse of the front façade. At ground floor level, the brickwork to the

columns also incorporates subtle decorative brick quoins referencing the neo-classical brickwork design of the neighbouring period property at No28.

- 6.3.21 To the rear, the materiality is consistent with the front façade but with a simpler design. Detailing such as the feature banding is also carried through, creating overall cohesive façades. The proposed deck access eliminates the requirement for internal corridors allowing for dual-aspect units which is considered positive and supported by the Quality Review Panel.
- 6.3.22 In conclusion, the proposal is considered to be an attractive and contemporary building which responds to the form and function of the proposed accommodation whilst having regard to the varied architecture within the surrounding townscape. As such the proposal is considered in accordance with the above policies.

6.4 Character and Appearance of the Conservation Area

- 6.4.1 London Plan (2021) Policy HC1 seeks to ensure that development proposals affecting heritage assets and their settings, should conserve their significance. This policy applies to designated and non-designated heritage assets. Local Plan Policy SP12 and DPD Policy DM9 set out the Council's approach to the management, conservation and enhancement of the Borough's historic environment.
- 6.4.2 DPD Policy DM9 states that proposals affecting a designated or non-designated heritage asset will be assessed against the significance of the asset and its setting, and the impact of the proposals on that significance; setting out a range of issues which will be taken into account. In relation to extensions or alterations to residential buildings, including roof extensions, Policy DM9 requires proposals to be of a high, site specific, and sensitive design quality, which respect and/ or complement the form, setting, period, architectural characteristics, detailing of the original buildings, including external features such as chimneys, and porches. The policy also requires the use of high-quality matching or complementary materials, in order to be sensitive to context.
- 6.4.3 The setting of a heritage asset is defined in the glossary to the NPPF as: "The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral". There is also the statutory requirement to ensure that proposals 'preserve or enhance' the conservation area.
- 6.4.4 The development site sits just outside the Clyde Circus Conservation Area boundary and forms part of a central area excluded from the surrounding Conservation Area designation due to its substantial alteration and markedly contemporary character. The eastern edge of the development site borders the rear gardens of the two storey, late Victorian houses fronting Collingwood Road. These dwellings are included in the Clyde Circus Conservation Area.
- 6.4.5 The Conservation Officer has assessed the proposal and states that the residential scale and consistent two storey townscape of the Conservation Area is intact and fully legible. The application demonstrates the impact of the proposal via two key views across the Conservation Area. The proposed development is considered to have a neutral impact on views to and from the conservation area.

- 6.4.6 The proposed view from Nelson Road shows that the proposed development would appear in the background of the original houses, but it will seamlessly sit alongside the existing buildings of similar height which already form the established visual setting of the conservation area, both as experienced along Nelson Road and as seen in views from Clyde Road.
- 6.4.7 The Conservation Officer states that the 'proposed development has been sensitively designed to complement the scale and height of the contemporary buildings within Lawrence Road, which form the existing and emerging context immediately surrounding the conservation area'.
- 6.4.8 The Conservation Officer considers the proposed scheme to have a neutral impact on the character and appearance of the conservation area, will cause no harm to its significance and will have a positive effect on the quality of its immediate surroundings. Accordingly, the proposed scheme is supported from the conservation stance, being in accordance with the above policies.

6.5 Impact on the amenity of adjoining occupiers

- 6.5.1 London Plan Policy D6 outlines that design must not be detrimental to the amenity of surrounding housing, and states that proposals should provide sufficient daylight and sunlight to surrounding housing that is appropriate for its context, while also minimising overshadowing. London Plan Policy D14 requires development proposals to reduce, manage and mitigate noise impacts.
- 6.5.2 Policy DM1 of the DM DPD states that development proposals must ensure a high standard of privacy and amenity for a development's users and neighbours. Specifically, proposals are required to provide appropriate sunlight, daylight and aspects to adjacent buildings and land, and to provide an appropriate amount of privacy to neighbouring properties to avoid material levels of overlooking and loss of privacy and detriment to amenity of neighbouring resident
- 6.5.3 The position and scale of the proposed development in relation to neighbouring buildings ensures that the outlook, privacy and level of sunlight/daylight enjoyed by existing residents will not be significantly affected.
- 6.5.4 The proposed development is sited and designed with regard to its impact on neighbouring residential amenity. The proposed residential building is located at the west of the site, continuing the established building line along Lawrence Road and filling the existing 'gap' in the street scene between the 'Vabel' development to the south and No 28 Lawrence Road to the north. Given that the proposal would simply continue the established street pattern, there are no concerns regarding the impact on the residential properties on the opposing side of Lawrence Road, to the west.

No. 28 Lawrence Road (North)

- 6.5.5 The proposed residential units retain a generous distance from the south façade of the main building which forms No 28 Lawrence Road. This 5 storey building is currently occupied by workshops, storage space and offices and the well glazed south elevation remains uninterrupted. The proposed residential block abuts a smaller 2-3 storey

structure just south of the main building which also forms part of No 28. The side elevation of this building is blank and as such allows for the proposed block to continue the pattern of development without impacting the amenity of this commercial building.

Vabel Building (South)

- 6.5.6 The neighbouring building to the south is the 7 storey, 'Vabel Lawrence' residential block. This was designed anticipating development on this site. This is a contemporary development which significantly informs the character, design, scale and massing of the proposal at 30-48 Lawrence Road. Objections have been received regarding the impact on the residents of this complex, in particular overlooking to the balconies on the south elevation of the 'North Apartments' which abuts the existing commercial building.
- 6.5.7 The proposed development will include predominantly dual aspect residential units above ground floor level and as such there is glazing to the rear. Most the glazing overlooks the existing commercial laundry. However, a column of windows on the south section of the proposed rear façade will create some views into the neighbouring Vabel development, mainly the balconies along the south façade of the 'north apartments'. These windows are from the bedrooms of the proposed units. It should be noted that the proposed apartments have been orientated towards Lawrence Road with the kitchen, dining and living spaces overlooking the main street and the less used areas, such as bedrooms, located to the rear, limiting casual overlooking of the north apartments. These balconies are already overlooked by windows in the rear elevation of the block of development facing Lawrence Road within the Vabel site.
- 6.5.8 In addition, all but one of the balconies are located on the front elevation facing Lawrence Road. One balcony is included at the 6th floor level, however the balustrade is constructed in brick, limiting overlooking from both the balcony and the residential unit itself.



- 6.5.9 Whilst it is recognised there is some overlooking to the Vabel development balconies, this is not considered to be significant for the above reasons. In addition, given the urban setting of the proposal, a degree of inter-visibility is inevitable and considered acceptable. The Vabel development itself is constructed with inter-visibility between its varying blocks.
- 6.5.10 As such, the council is satisfied the orientation of the residential units to Lawrence Road and the lack of balconies to the rear elevation is sufficient to reduce the impact on the amenity the Vabel residential units.

Collingwood Road

- 6.5.11 Whilst the rear of the proposed residential block is glazed, the block is over 50m away from the rear gardens to the terraced houses facing Collingwood Road. As stated above, the proposed apartments have been orientated towards Lawrence Road with the kitchen, dining and living spaces overlooking the main street and the less used areas such as bedrooms located to the rear, limiting casual overlooking. Deck access is proposed to the rear. Whilst this will involve residents coming and going, there is no space to linger and as such, no significant overlooking is envisaged, particularly given the significant distance from Collingwood Road.
- 6.5.12 The most significant potential impact to the residents of Collingwood Road is the roof extension of the retained commercial unit, currently occupied by a laundry. At the request of officers, the addition has been set back from the existing boundary between the commercial unit and the rear gardens of Collingwood Road. The additional volume is comparable in location to the third and fourth floors of the neighbouring Vabel development. Given this set-back, the increase in massing and scale to the commercial is not considered significant over and above the existing relationship between the Collingwood Road properties and the existing laundry.

Daylight to neighbouring properties

- 6.5.13 The applicant has submitted a comprehensive Daylight and Sunlight report. The study assessed the potential effects of the proposed development on daylight and sunlight to surrounding residential properties and to all proposed dwellings using methodologies recommended in the Building Research Establishment (BRE) guide.
- 6.5.14 The advice contained in the BRE guide is not mandatory and its numerical guidelines should be interpreted flexibly, with daylight and sunlight only one of many factors to consider when evaluating the acceptability of a scheme. This flexible approach is also echoed in the national and regional planning policy which state that a flexible should be adopted so long as a scheme does not cause unacceptable harm on existing and future residents.
- 6.5.15 The daylight results indicate that 80% of neighbouring windows and 86% of neighbouring rooms satisfy the BRE guidelines in daylight terms. These present a good level of adherence to the BRE guidelines and indicate that all neighbouring properties will remain with acceptable levels of daylight in the post development condition. Of those windows which do not satisfy guidelines, the majority will experience a low or medium

reduction beyond the BRE recommendations, which is considered acceptable in an urban context.

- 6.5.16 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, reasonably close to the full BRE Guide recommendations, is convincingly predicted to be achieved.
- 6.5.17 The sunlight results indicate that all neighbouring rooms considered will satisfy the BRE guidelines. The overshadowing results indicate that all neighbouring Collingwood Road gardens will satisfy the BRE guidelines.
- 6.5.18 Overall, the daylight and sunlight results show an acceptable adherence with the BRE guidelines indicating that the majority of neighbouring residential properties and Proposed Dwellings will benefit from acceptable levels of daylight and sunlight. The report states that, on balance, the proposed development is not out of context for the immediate surrounding area and will not cause unacceptable harm to existing and future residents.
- 6.5.19 In conclusion, the proposed development is consistent with the Council's local planning policy on daylight and sunlight, particularly having regard to paragraph 129 of the NPPF and Policy DM1 of the Local Plan.
- 6.5.20 As such the proposal is not considered to have a significant, detrimental impact on the amenity of the existing properties in accordance with the above policies.

6.6 Landscaping & Biodiversity

- 6.6.1 In addition to the general design-led policies in the previous section, London Plan (2021) Policy G4 seeks to "promote the creation of new areas of publicly accessible open space" as well as "enhance open spaces to provide a wider range of benefits for Londoners". London Plan Policy G5 requires major development proposals to contribute to the greening of London by including urban greening as a fundamental element of site and building design.
- 6.6.2 London Plan Policy G6 seeks to manage impacts on biodiversity and aims to secure biodiversity net gain. London Plan Policy S4 states the need to provide new play facilities as part of development proposals, with at least 10m² of play space per child provided which meets several criteria.
- 6.6.3 Local Plan Policy SP11 promotes high quality landscaping on and off-site and Policy SP13 seeks to protect and improve open space and providing opportunities for biodiversity and nature conservation, including provision of formal play space to standards set out in the Mayor's SPG Providing for Children's and Young People's Play and Informal Recreation.
- 6.6.4 DPD Policy DM1 of the DM DPD requires proposals to demonstrate how landscape and planting are integrated into the development and expects development proposals to

respond to trees on or close to a site. Policy DM21 expects proposals to maximise opportunities to enhance biodiversity on-site.

- 6.6.5 The application proposes partial redevelopment of the site providing new, high-quality housing whilst retaining commercial uses on the site. This offers the opportunity to significantly improve the site with high-quality landscaping as well as enhancing the visual and residential amenity of the immediate area.
- 6.6.6 The existing site offers very little greenery with some modest trees located within the site and more mature street trees located to the front of the site, on-street.
- 6.6.7 Aside from the aforementioned trees, the site is void of any vegetation or green spaces. The applicant proposes to improve the biodiversity present at the site by building around the existing street trees and creating a range of additional habitat types on-site. This includes the planting of six new trees (on-site) and surrounding planting, biodiverse green roofs at multiple floor levels and the incorporation of permeable paving. In addition, ground level planters as well as a sustainable drainage system (SuDS) are proposed.
- 6.6.8 The most significant landscaped areas are the roof levels (at 6th and 7th floors) and the communal space located at first floor level between the proposed residential block and the retained commercial unit to the rear of the site and the ground floor courtyard, created as part of the revised design. Smaller areas of landscaping are also proposed at the ground floor level facing the street.
- 6.6.9 The landscape proposals are considered to significantly increase biodiversity through planting (including green roofs) and species to the site. A condition requiring submission of a detailed landscaping design has been added.
- 6.6.10 In addition, the applicant will provide an additional 4 street trees (off-site)

The Urban Greening Factor (UGF)

- 6.6.11 The London Plan Policy G5 'Urban greening' states that major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs and nature-based sustainable drainage. The Mayor recommends a target score of 0.4 for developments that are predominately residential.
- 6.6.12 An assessment of the Urban Greening Factor (UGF) has been undertaken, based on the surface cover types and areas within the application boundary. The proposal has an Urban Greening Factor of 0.38, which is broadly inline with the London Plan target score of 0.4 for predominantly residential developments. For commercial developments the London Plan target is a factor of 0.3. As the proposal is a mix-use development, mixing both residential and commercial elements, the proposed UGF of 0.38 sits comfortably between the two targets and is considered acceptable.
- 6.6.13 The proposed development presents an indicative landscaping scheme to cater for the future residents and employees, ensuring the setting of the new homes is attractive,

green, and safe and complements and enhances the character and appearance of the surrounding area.

- 6.6.14 The proposal represents marked improvements to the hard and soft landscaping on-site and in its immediate environs and would result in a greener open space provision which is considered acceptable for this location, housing size/population, and typology. Subject to receipt of a detailed landscaping strategy, the proposal satisfies the above planning policies in this regard.

Ecology - Biodiversity Net Gain

- 6.6.15 London Plan Policy G6 seeks to manage impacts on biodiversity and aims to secure biodiversity net gain.
- 6.6.16 Local Plan Policy SP11 promotes high quality landscaping on and off-site and Policy SP13 seeks to protect and improve open space and providing opportunities for biodiversity and nature conservation.
- 6.6.17 Policy DM1 of the DM DPD requires proposals to demonstrate how landscape and planting are integrated into the development and expects development proposals to respond to trees on or close to a site. Policy DM21 of the DM DPD expects proposals to maximise opportunities to enhance biodiversity on-site.
- 6.6.18 Biodiversity Net Gain (BNG) is an approach to development which makes sure that habitats for wildlife are left in a measurably better state than they were before the development.
- 6.6.19 The Environment Act 2021 introduced a statutory requirement to deliver a BNG of 10%. This means a development will result in more or better-quality natural habitat than there was before development.
- 6.6.20 The applicant's Biodiversity Net Gain Assessment sets that the site has a Habitat Baseline value of 0.10 habitat units. This is due to the developed nature of the site which is mostly hardstanding or other built surfaces. The proposal includes a green roof, green wall, a sustainable urban drainage system, ground level planters and landscaping which results in a 446.2.% net gain of area-based habitat units. This is greatly in excess of the mandatory 10% net gain required.

6.7 Housing Mix, Tenure and Quality of Accommodation

Housing and Affordable Housing Provision

5 Year Housing Land Supply

- 6.7.1 The Council at the present time is unable to fully evidence its five-year housing land supply. The 'presumption in favour of sustainable development' and paragraph 11(d) of the NPPF should be treated as a material consideration when determining this application, which for decision-taking means granting permission unless the application of policies in the NPPF that protect areas or assets of particular importance provides a clear reason for refusal or any adverse impacts of doing so would significantly and

demonstrably outweigh the benefits when assessed against the policies in the NPPF taken as a whole.

- 6.7.2 Nevertheless, decisions must still be made in accordance with the development plan (relevant policies summarised in this report) unless material considerations indicate otherwise (of which the NPPF is a significant material consideration).
- 6.7.3 The NPPF 2023 states that where it is identified that affordable housing is needed, planning policies should expect this to be provided on site in the first instance. The London Plan also states that boroughs may wish to prioritise meeting the most urgent needs earlier in the Plan period, which may mean prioritising low-cost rented units.
- 6.7.4 Local Plan Policy SP2 states that subject to viability, sites capable of delivering 10 units or more will be required to meet a Borough wide affordable housing target of 40%, based on habitable rooms. Policy DM13 of the DM DPD reflects this approach and sets out that the Council will seek the maximum reasonable amount of affordable housing provision when negotiating on schemes with site capacity to accommodate more than 10 dwellings, having regard to Policy SP2 and the achievement of the Borough-wide target of 40% affordable housing provision, the individual circumstances of the site Development viability; and other planning benefits that may be achieved. For this site, 'other relevant planning benefits' include the provision of employment space, in line with the Tottenham Area Action Plan site allocation SS2 Lawrence Road, which has an impact on viability.
- 6.7.5 The Mayor of London's Affordable Housing and Viability (AHV) SPG states that all developments not meeting a 35% affordable housing threshold should be assessed for financial viability through the assessment of an appropriate financial appraisal, with early and late-stage viability reviews applied where appropriate.

Viability assessment and review

- 6.7.6 The applicant proposes nine affordable residential units delivered as 100% shared ownership (reflecting 19% affordable housing by habitable room). The proposal is supported by a viability appraisal showing that 40% affordable housing is not viable on this site. An independent assessment of the applicant's Viability Assessment Report has been undertaken by BNP Paribas Real Estate on behalf of the Council to determine whether the affordable housing offer and Section 106 contributions as proposed have been optimised.
- 6.7.7 The assessment concludes that current construction costs have resulted in the proposed development generating a negative profit of -4.92% against the target developer return. Therefore, BNP Paribas Real Estate consider the proposed nine affordable residential units delivered as 100% shared ownership (reflecting 19% affordable housing by habitable room) to be the maximum reasonable amount and in fact more than is viable on the site. The applicant has taken a commercial decision to provide more affordable housing than is viable on the basis that a late-stage review will not be required. This is accepted by officers as it is unlikely that a late-stage review would secure any greater provision of affordable housing.

Affordable Housing Mix

- 6.7.8 Tottenham Area Action Plan (TAAP) (2017) policy APP3 states that the Council will expect affordable housing to be provided in accordance with Policy SP2 of the Local Plan: Strategic Policies and DM13 of the DM DPD, with the exception of the affordable tenure split (DM13 A(b)) which in the Tottenham AAP area should be provided at 60% intermediate accommodation and 40% affordable rented accommodation. This policy demonstrates a greater preference in this area towards intermediate tenures over other tenures.
- 6.7.8 Local Plan Policy DM13 Affordable Housing subsection C states “The Council may seek to alter the tenure and/or mix of affordable provision to be secured on a case-by-case basis... to assist in improving development viability (e.g. through provision of a greater ratio of intermediate housing”. Paragraph 6.10 of the adopted Planning Obligations Supplementary Planning Document (SPD) states “There may be instances when the Council considers that an alternative mix between social/affordable rented and intermediate housing is appropriate”.
- 6.7.9 As set out in paragraph 6.7.4 and 6.7.5, the proposal would seek to deliver 19% shared ownership (intermediate) housing (by habitable room), which equates to 9 intermediate homes and 29 intermediate habitable rooms, as a result of the development not being currently viable. Alternative options were considered to ensure the maximum reasonable amount of Affordable Housing was achieved.
- 6.7.10 The viability review presented an alternative option equating to the same developer return as the proposed shared ownership homes, with the aim to deliver larger, social rented units, in line with the councils housing needs. This however, due to viability challenges, this would only deliver 9% affordable housing (by habitable room), resulting in three social rent units and one shared ownership unit.
- 6.7.11 While this would have delivered affordable housing more in line with the Councils housing needs, such a small quantity of affordable housing units and particularly social rented units, is considered insufficient to attract a registered housing provider to purchase the properties due to difficulties managing this small number of properties within a private development, due to the affordable housing requiring separate cores to manage. As such, officers consider the proposed nine affordable residential units delivered as 100% shared ownership (reflecting 19% affordable housing by habitable room) to be an acceptable provision in accordance with adopted planning policy and guidance in this instance. This aligns with the affordable strategy approved by LBH on the neighbouring Vabel Lawrence scheme that is now constructed and occupied. As such, given the need for a variety of high-quality housing in the borough the proposed unit mix is therefore considered acceptable.

Housing Mix

- 6.7.12 London Plan (2021) Policy H10 states that schemes should generally consist of a range of unit sizes. To determine the appropriate mix of unit sizes in relation to the number of bedrooms for a scheme, it advises that regard is made to several factors. These include robust evidence of local need, the requirement to deliver mixed and inclusive neighbourhoods, the nature and location of the site (with a higher proportion of one and two bed units generally more appropriate in locations which are closer to a town centre or station or with higher public transport access and connectivity), and the aim to optimise housing potential on sites.

- 6.7.13 The Local Plan Policy SP2 Housing and Policy DM11 Housing Mix of the Council's DM DPD adopt a similar approach.
- 6.7.14 Policy DM11 of the DM DPD states that the Council will not support proposals which result in an over concentration of 1 or 2 bed homes overall unless they are part of larger developments or located within neighbourhoods where such provision would deliver a better mix of unit sizes.
- 6.7.15 The proposal will provide 56 residential homes (25 x 1 bedroom, 22 x 2 bedroom, and 9 x 3 bedroom). Given that 16% of units proposed are family-sized units and given the significant provision of family-sized units on neighbouring sites along Lawrence Road, the number of one and two-bed units is not considered an overconcentration and is accepted.

Quality of Accommodation

- 6.7.16 The Nationally Described Space Standards set out the minimum space requirements for new housing. The London Plan (2021) standards are consistent with these. London Plan Policy D6 requires housing developments to be of high-quality design, providing comfortable and functional layouts, benefiting from sufficient daylight and sunlight, maximising the provision of dual aspect units and providing adequate and easily accessible storage space as well as outdoor amenity space. It provides qualitative design aspects that should be addressed in housing developments.
- 6.7.17 The Mayor of London's Housing SPG seeks to ensure that the layout and design of residential and mixed-use development should ensure a coherent, legible, inclusive and secure environment is achieved. Indoor and outdoor space/accommodation standards.

Indoor and outdoor space/accommodation standards

- 6.7.18 All dwellings achieve or exceed minimum space standards including bedroom sizes, gross internal area, and outside amenity space standards (balconies and terraces). All dwellings have a minimum floor to ceiling height of 2.65m. In addition, all dwellings are well laid out to provide useable living spaces and sufficient internal storage space. 42 of 56 (75%) units are dual aspect under the definition of Appendix 3 of the Housing Design Standards GLA document. All 3 bed family units are dual aspect.
- 6.7.19 Daylight and sunlight studies have been undertaken. The study is based on the numerical tests laid down in the relevant BRE guidance. It concludes that all dwellings, will benefit from daylight and sunlight level that are comparable with the other residential building fronting Lawrence Road. The overshadowing results show that the proposed amenity areas will benefit from good levels of direct sunlight.
- 6.7.20 Overall, the daylight and sunlight results show an acceptable adherence with the BRE guidelines. All dwellings are considered to be well laid out with sufficient space for storage to provide useable living spaces to meet modern living arrangements.
- 6.7.21 The proposal would result in an acceptable standard of accommodation for future occupiers in this regard.

Accessible Housing

- 6.7.22 London Plan Policy D5 seeks to provide suitable housing and genuine choice for London's diverse population, including disabled people, older people and families with young children. To achieve this, it requires that 10% of new housing is wheelchair accessible and that the remaining 90% is easily adaptable for residents who are wheelchair users. Local Plan Policy SP2 is consistent with this as is DPD Policy DM2 which requires new developments to be designed so that they can be used safely, easily and with dignity by all.
- 6.7.23 All dwellings achieve compliance with Building Regulations M4 (2) and over 10% of units achieve M4 (3) compliance. Five accessible car parking spaces are provided. The proposal is considered to provide an acceptable level of disabled parking provision, if further spaces are needed, they can be provided on street where additional parking will be available following the removal of the existing large crossover. The proposal is therefore acceptable in this regard.
- 6.7.24 All flats have level access via lifts. In addition, the landscaping/access to the development is accessible by all and all residential entrances are level threshold.

Noise - future occupiers

- 6.7.25 The NPPF states, in paragraph 180, that new development should mitigate and reduce to minimum potential adverse impacts resulting from noise and avoid noise giving rise to significant adverse impacts on health and the quality of life. London Plan Policy D14 specifically concerns noise and requires development proposals to reduce, manage and mitigate noise impacts. Local Plan Policy DM23 states that the Council will seek to ensure that new noise sensitive development is located away from existing or planned sources of noise pollution. Proposals for potentially noisy development must suitably demonstrate that measures will be implemented to mitigate its impact.
- 6.7.26 An Acoustic Assessment is submitted with this planning application. The assessment demonstrates that appropriate internal noise levels are achievable with the installation of nominal/glazing systems and typical trickle ventilators.
- 6.7.27 The Acoustic Assessment confirms the proposed private residential amenity will provide residents with suitable spaces and be acceptable in noise terms. The Proposed Development therefore complies with LBH Development Management Policy DM23
- 6.7.28 In accordance with the recommendations of the Noise Assessment, the development incorporates nominal/glazing systems and typical trickle ventilators.
- 6.7.29 In summary, the standards of accommodation and living conditions proposed are very high. For a scheme in this location with its site constraints, the proposal represents good quality units and living conditions which satisfy the above policies.

6.8 Parking and highway safety/ waste recycling and servicing

- 6.8.1 Paragraph 110 of the NPPF (2023) states that in assessing development proposals, decision makers should ensure that appropriate opportunities to promote sustainable transport modes have been taken up, given the type of development and its location. It

prioritises pedestrian and cycle movements, followed by access to public transport, including facilities to encourage this.

- 6.8.2 The London Plan (2021) Policy T1 sets out the Mayor's strategic target for 80% of all trips in London to be made by foot, cycle or public transport by 2041. This policy also promotes development that makes the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport. Policy T6 sets out cycle parking requirements for developments, including minimum standards. T7 concerns car parking and sets out that 'car-free' development should be the starting point for all development proposals in places that are well-connected by public transport. Policy T6.1 sets out requirements for car parking spaces that are proposed.
- 6.8.3 Local Plan Policy SP7 states that the Council aims to tackle climate change, improve local place shaping and public realm, and environmental and transport quality and safety by promoting public transport, walking and cycling and seeking to locate major trip generating developments in locations with good access to public transport. This approach is continued in DM DPD Policies DM31, DM32 and DM33.
- 6.8.4 DM32 is particularly relevant and states that the Council will support proposals for new development with limited or no on-site parking where there are alternative and accessible means of transport available, public transport accessibility is 3-4 as defined in the Public Transport Accessibility Index, a Controlled Parking Zone (CPZ) exists or will be extended prior to the occupation of the development, parking is provided for disabled people; and parking is designated for occupiers of developments specified as car capped.
- 6.8.5 The site is currently a warehouse occupied by a commercial laundry business, with a car park which has 20 parking spaces. The development would remove the existing spaces but provide 5 on-site Blue Badge car parking spaces which are located within an internal forecourt and accessed via a new vehicle crossover. The spaces would consist of 1 active and 4 passive electric vehicle charging points, which would be provided for the residential element of the proposal.

Car Free

- 6.8.6 A 'car-free' development is proposed meaning only wheelchair accessible parking is provided on site and permits would not be allocated to the new properties for on street parking. The site has a PTAL rating of 3 (denoting reasonably good Public Transport Access when compared to London as a whole). However, the southern part of Lawrence Road consists of PTAL 4 and 5 (denoting very good access to Public Transport). The site is located within the Seven Sisters CPZ that restricts parking to permits holder Monday to Saturday 08:00 – 18:30.
- 6.8.7 Given the site's location within a CPZ and the on-site provision of accessible parking in line with London Plan (2021) standards, the proposed development would qualify for a car-free status, in accordance with Policy DM32: Parking of the Development Management DPD.
- 6.8.8 Given the PTAL of the Lawrence Road (a mix of level 3 'moderate' to 5 'good') denoting its close proximity to public transport links, the lack of parking for the commercial element of the development is considered acceptable and in accordance with Policy

DM32 of the DM DPD which states the council will support proposals for new developments with limited or no on-site parking, where 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 and where parking is provided for wheelchair accessible units.

- 6.8.9 Accordingly, the LPA would restrict future occupiers from receiving on-street resident parking permits. The Council would use a legal agreement to secure this and require the applicant to advise all occupiers of the car-capped status of the proposed development.

Disabled Persons Parking

- 6.8.10 The London Plan Policy T6.1 Residential parking (Part G.1) states that disabled persons parking should be provided for new residential developments. Residential development proposals delivering ten or more units must, as a minimum ensure that for three per cent of dwellings, at least one designated disabled persons parking bay per dwelling is available from the outset. This equates to 1.68 or two car parking spaces. Given that the proposal is providing five spaces, the applicant is exceeding policy requirements.
- 6.8.11 Part G.2 of the above policy requires residential development proposals delivering ten or more units must, as a minimum demonstrate as part of the Parking Design and Management Plan, how an additional seven per cent of dwellings could be provided with one designated disabled persons parking space per dwelling in future upon request as soon as existing provision is insufficient. Seven per cent of 56 units equates to 4 spaces. Given that the proposal is providing five spaces (10% of 56 is 5.6 spaces), this provision is already largely satisfied, and officers are satisfied the remaining provision can be met if required in future.

Highway Works

- 6.8.12 The applicant proposes to remove the existing 11.6m vehicle access and reinstate the footway, this will enable on-street parking bays to be restored if needed. Furthermore, a new smaller 7m access is proposed to serve the 5 new disabled bays located within the ground floor. This would require the removal of 2 on-street parking bays. In all, these works would be considered minor to facilitate the operations of the site. A financial contribution is sought toward the repair of the footway at the front of the site. 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.

Trips Forecast & Future Parking Demands

- 6.8.13 Trip information has been provided which utilises data from survey sites from the TRICS database. Four comparable sites were assessed. No trip information has been provided for the commercial element of the proposal as there will be a slight reduction in the floor area by some 162sqm which is likely to generate fewer commercial trips when compared to the existing floor area of some 1,834 sqm. Whilst the impact of car trips is forecast to be low, both commercial and residential travel plans are to be secured via condition.

- 6.8.14 Parking management measures will be required in the form of a review of the current parking management measures which may include extended double yellow lines with double blips at junctions and a review of the current CPZ operational times. A contribution of £20,000 (twenty Thousand Pounds) from the applicant is required to undertake a review of the current parking management measures on Lawrence Road and the surrounding road for the implementation of parking and loading measures and potential changes to the CPZ operational hours.

Cycle Parking (residential)

- 6.8.15 The residential aspect of the development would see the provision of 103 long-stay cycle parking spaces and 23 short-stay cycle parking spaces. Policy requires provision of 100 long-stay and 2 short-stay space. Therefore, a significantly higher number of cycle parking spaces is proposed above policy requirements. As such, this is welcomed by officers.

Cycle Parking (Commercial)

- 6.8.16 LBH Transportation advises that the applicant will be required to provide 8 long-stay cycle parking spaces and 2 short-stay cycle parking spaces; which the applicant has agreed to.
- 6.8.17 LBH Transport Planning has requested that a condition be added securing provision of full details showing the cycling parking systems to be used, access to them, the layout and space around the cycle parking spaces with all dimensions marked up on plans. This has been added accordingly.

Waste and recycling

- 6.8.18 London Plan Policy D6 requires suitable waste and recycling storage facilities in all new developments, Local Plan Policy SP6 Waste and Recycling and DPD Policy DM4 require development proposals to make adequate provision for waste and recycling storage and collection.
- 6.8.19 Refuse and recycling will be located within two residential waste stores and a store for the workspace / commercial floorspace. The workspace / commercial tenants will be informed when signing their tenancy agreement for the workspace / commercial floorspace that they will be responsible for transferring their waste to the waste store ahead of collection.
- 6.8.20 Residential refuse collection for the proposed development is anticipated to be undertaken by the existing LBH refuse collections which service neighbouring properties. A private collection is likely to be arranged for the commercial floorspace.
- 6.8.21 As such, the proposal is considered acceptable with further details secured via condition.

6.9 Sustainable Energy and Climate Change

- 6.9.1 The NPPF requires development to contribute to the transition to a low carbon future, reduce energy consumption and contribute to and conserve the natural environment. The proposed development has sought to adopt a progressive approach in relation to

sustainability and energy to ensure that the most viable and effective solution is delivered to reduce carbon emissions.

- 6.9.2 London Plan Policy SI 2 - Minimising greenhouse gas emissions, states that major developments should be zero carbon, and in meeting the zero-carbon target a minimum on-site reduction of at least 35 per cent beyond Building Regulations is expected. Local Plan Policy SP4 requires all new developments to introduce measures that reduce energy use and carbon emissions. Residential development is required to achieve a reduction in CO₂ emissions. Local Plan Policy SP11 requires all development to adopt sustainable design and construction techniques to minimise impacts on climate change and natural resources.
- 6.9.3 DPD Policy DM1 states that the Council will support design-led proposals that incorporate sustainable design and construction principles and Policy DM21 expects new development to consider and implement sustainable design, layout and construction techniques.
- 6.9.4 The building is designed to minimise its environmental impact through various means and minimise carbon dioxide emissions in line with the prescribed energy hierarchy. The development employs an efficient building fabric, including well insulated walls and highly efficient glazing and incorporates air source heat pumps and PV Panels to maximise carbon savings.
- 6.9.5 Green roofs and sustainable drainage (SUDS) further contribute to the sustainable nature and biodiversity of the site.
- 6.9.6 An Energy and Sustainability Statement was submitted with the application, which demonstrates that consideration has been given to sustainable design principles throughout the design of the proposed scheme. The report has been revised in consultation with Carbon Management Officers.
- 6.9.7 The revised energy report has proposed a communal heating system which is in line with what was proposed and supported during pre-application discussions. The heating strategy has been revised from individual to a communal water loop air source heat pump.
- 6.9.8 The development now proposes an overall carbon reduction of 82% against Part L 2021. This is supported in principle.
- 6.9.9 An indicative carbon shortfall of 10.0 tCO₂/year remains. The remaining carbon emissions will need to be offset at £95/tCO₂ over 30 years. A Carbon Offset Contribution is outlined in the proposed Heads of Terms.
- 6.9.10 The applicant has proposed a saving of 7.6 tCO₂ in carbon emissions (14%) through improved energy efficiency standards in key elements of the build. This goes beyond the minimum 10% and 15% reduction respectively set in London Plan Policy SI2, so this is supported.
- 6.9.11 Given the proposed changes at ground floor level in response to the Health and Safety Executive's comments, a further revised Energy Statement is required to reflect these changes. This has been secured via condition.

Overheating

- 6.9.12 In accordance with the Energy Assessment Guidance, the applicant has undertaken a dynamic thermal modelling assessment in line with CIBSE TM59 with TM49 weather files, and the cooling hierarchy has been followed in the design. The overheating Assessment has been undertaken to minimise the risk of overheating within the proposed development and to reduce reliance on air conditioning. In line with the Cooling Hierarchy outlined within the London Plan, a number of measures to minimise the risk of heating have been employed within the proposed development. The submitted overheating strategy is considered acceptable.
- 6.9.13 In summary, the Council's Carbon Management Team has been consulted on the application. The applicant has submitted a revised heating strategy, and the development achieves a reduction of 82% carbon dioxide emissions on site, which is supported in principle.

6.10 Crime Prevention

- 6.10.1 London Plan Policy D3 states that development proposals should achieve safe, secure and inclusive environments. Local Plan Policy requires all development to incorporate solutions to reduce crime and the fear of crime by promoting social inclusion, creating well-connected and high-quality public realm that is easy and safe to use and apply 'Secured by Design' and Safer Places principles. DPD Policy DM2 seeks to ensure that new developments have regard to the principles set out in 'Secured by Design'.
- 6.10.2 The proposal has been assessed by The Metropolitan Police, Designing Out Crime Officer. The Officer states that the project has the potential to achieve a Secured by Design Accreditation and as such has no objections to the proposal subject to conditions. Suggested conditions and informative have been attached accordingly.

6.11 Flood Risk and Drainage

- 6.11.1 Local Plan Policy SP5 and Policy DM24 of the DM DPD seek to ensure that new development reduces the risk of flooding and provides suitable measures for drainage.
- 6.11.2 The applicant has submitted a Flood Risk Assessment and Sustainable Drainage Statement. These have been reviewed by LBH Flood & Water Management who has requested that additional information be submitted. As condition requiring this prior to above ground works has been added accordingly.

6.12 Air Quality

- 6.12.1 Policy DM23 of the DM DPD requires all development to consider air quality and improve or mitigate the impact on air quality in the borough and users of the development. An Air Quality Assessment ('AQA') was prepared to support the planning application and concluded that the site is suitable for residential use and that the proposed development would not expose existing residents or future occupants to unacceptable air quality. It also highlighted that the air quality impacts from the proposed development during its construction phase would not be significant and that in air quality terms it would not conflict with national or local planning policies.

- 6.12.2 Officers have reviewed the submitted AQA. The AQA confirms that the proposed development will be air quality neutral in terms of building emissions and air quality neutral in terms of transport emissions. The proposed development will therefore be at least air quality neutral overall. It can therefore be concluded that the proposed development is not considered to conflict with national, regional and local planning guidance.
- 6.12.3 Officers acknowledge that while concerns raised about construction works are noted, these are temporary and can be mitigated through the requirements of the construction management plan to include air quality control measures such as dust suppression. Appropriate measures have been recommended and, with these measures in place, it is expected that any residual effects will be 'not significant'.
- 6.12.4 The proposal is not considered an air quality risk or harm to nearby residents, or future occupiers. The proposal is therefore acceptable in this regard.

6.13 Land Contamination and Pollution

- 6.13.1 Policy DM23 (Part G) of the DM DPD requires proposals to demonstrate that any risks associated with land contamination can be adequately addressed to make the development safe.
- 6.13.2 A Preliminary Investigation Report (June 2003) has been undertaken, with special reference to historic and current potential contaminative activities and processes. Based on the information obtained during the compilation of this Preliminary Investigation and the preliminary conceptual site model, a potential for a low to moderate risk of contamination has been identified.
- 6.13.3 The Council's Pollution service have reviewed the scheme in detail and agree that the proposal is acceptable subject to conditions.
- 6.13.5 Subject to appropriate conditions to deal with land-contamination risk, the proposal would satisfy the above planning policy requirements and is acceptable in this regard.

6.14 Trees

- 6.14.1 DM Policy (2017) DM1 'Delivering High Quality Design' states that the Council will expect development proposals to respond to trees on and close to the site.
- 6.14.2 A total of 10 individual trees were surveyed by the applicant. All of the trees were considered to be category B (moderate value). No category A (Highest value) trees are present within or adjacent to the site. LBH Arboricultural Officer agrees with the allocated tree classification categories.
- 6.14.3 A total of 6 individual trees require removal to facilitate the proposed development. All trees (T3, T4, T5, T6, T8 and T9) are Silver Birch and are located just within the site boundary, peppered amongst the existing car-parking and near the front boundary fence. LBH Arboricultural Officer states that the removal of the Birch trees is acceptable as this is a short-lived species and are easily replaceable, this is set out below.

- 6.14.4 The remaining 4 trees (T1, T2, T7 and T10) are London Planes. These mature plane trees are street trees which form part of the avenue of plane trees which line Lawrence Road on both sides and are a significant contributor to the character and appearance of street. As such, their retention is considered essential.
- 6.14.5 The footprint of the proposed new building encroaches into the circular representation of the Root Protection Areas (RPAs) of these street trees (T1 and T2, and T7 and T10) The existing growing conditions within the RPAs of trees to be retained comprises of various structures (walls, steps), buildings, and hard surfacing (concrete, tarmac), which will have limited rooting viability beneath the surface. These areas would benefit from amelioration to improve the condition of the rooting environment for the future longevity of the trees. In addition, to mitigate the impact upon notional RPAs of retained trees resulting from the installation of proposed structures/surfacing to impacted RPAs (Trees T01, T02, T07 and T10), impacted trees will be subject to soil improvement, thereby offsetting any potential impact from the proposals. Soil amelioration would be carried out post-demolition of the existing building and surfacing, and prior to the installation of new structures and surfacing.
- 6.14.6 All retained trees will be protected in accordance with BS 5837:2012 specifications throughout the development. This report includes guidance on tree protection measures and providing these are adhered to, there will be no adverse impact on the long-term potential on the retained trees.
- 6.14.7 Notwithstanding the above assurances, the report sets out a series of recommendations prior and during construction that will ensure impacts to trees are minimised. Tree protection methods are secured via condition.

Replacement Trees

- 6.14.8 The proposal contains new green spaces including at ground floor and first floor levels, in addition to green roofs. Six new trees are proposed within the new ground floor courtyard space. The applicant has agreed to provide 4 additional street trees (off-site) to replace those lost on-site. Ten trees are proposed in total. As such there will be no net-loss of trees.
- 6.14.9 The Arboricultural Officer has been consulted and raises no objections, subject to conditions. In conclusion, the proposal ensures the protection of existing species, with no net loss of trees and is considered acceptable, subject to conditions.

6.15 Employment and Skills

- 6.15.1 Local Plan Policies SP8 and SP9 aim to support local employment, improve skills and training, and support access to jobs. The Council's Planning Obligations Supplementary Planning Document (SPD) requires all major developments to contribute towards local employment and training.
- 6.15.2 There would be opportunities for borough residents to be trained and employed as part of the development's construction process. The Council requires the developer (and its contractors and sub-contractors) to notify it of job vacancies, to employ a minimum of 20% of the on-site workforce from local residents (including trainees nominated by the Council). These requirements would be secured by legal agreement.

6.11.3 An employment skills and training plan, which is recommended to be secured by a s106 planning obligation, would ensure a target percentage of local labour is utilised during construction and a financial contribution towards apprenticeships. This would benefit priority groups that have trouble in accessing employment. The applicant would be required. As such, the development is acceptable in terms of employment provision.

6.15.3 As such, the development would have a positive impact in terms of employment provision.

6.16 Fire Safety

6.16.1 Proposals for relevant high-rise buildings which include two or more homes and are 18 metres or 7 storeys or more in height are subject to 'Planning Gateway 1' with regard to fire safety as set out in national regulations and guidance. This requires the developer to submit a fire statement and for the Health and Safety Executive (HSE) to be consulted. Subsequent fire safety Gateways relate to Building Control approval and Completion certificates.

6.16.2 London Plan Policy D12 states that: In the interests of fire safety and to ensure the safety of all building users, all development proposals must achieve the highest standards of fire safety and ensure that they:

- 1) identify suitably positioned unobstructed outside space
- 2) are designed to incorporate appropriate features which reduce the risk to life and the risk of serious injury in the event of a fire; including appropriate fire alarm systems and passive and active fire safety measures
- 3) are constructed in an appropriate way to minimise the risk of fire spread
- 4) provide suitable and convenient means of escape, and associated evacuation strategy for all building users
- 5) develop a robust strategy for evacuation which can be periodically updated and published, and which all building users can have confidence in
- 6) provide suitable access and equipment for firefighting which is appropriate for the size and use of the development.

B All major development proposals should be submitted with a Fire Statement, which is an independent fire strategy, produced by a third party, suitably qualified assessor.

6.16.3 The applicant has submitted a fire statement to meet the national and London Plan requirements which sets out how the development responded to the requirements set out in London Plan policy D12, resulting in a building which has been designed to ensure compliance with the fire safety guidelines. It has also recommended that a building management plan be delivered to ensure the highest standards of fire safety be maintained throughout the lifecycle of the building.

6.16.4 The HSE has responded to the revised application stating that they are 'content with the fire safety design as set out in the project description, to the extent it affects land use planning considerations'. As such, the proposal is considered acceptable.

6.17 Conclusion

- The site is within an established neighbourhood with good access to public transport and existing neighbourhood facilities, where planning policy expects additional housing at a greater density than existing. This is subject to a design-led approach to the development of the site, which was carried out here to capitalise on the opportunities and location of the site to bring forward new homes. In land-use terms, the proposal is strongly supported in principle.
- The development retains 1,050 sqm (GIA) of commercial use (Class E) on site. This comprises of four new units fronting Lawrence Road totalling 146 sqm, with the remaining 904 sqm (GIA) being the partial retention of the existing commercial building to the rear of the site. In total, the commercial element on site would be reduced from 1834sqm to 1050sqm; a net loss of 784sqm (approx. 42.75%).
- The development would be of a high-quality design which responds appropriately to the local context, particularly the neighbouring conservation area.
- Proposed Development seeks to deliver 19% affordable housing (by habitable room) as shared ownership.
- Existing London Plane trees along Lawrence Road to be retained. Six new trees are proposed on site. 4 replacement street trees agreed via condition.
- The size, mix, tenure, and quality of accommodation are acceptable and either meet or exceed relevant planning policy standards. All flats have private external amenity space.
- The proposal has been designed to avoid any material harm to neighbouring amenity in terms of a loss of sunlight and daylight, outlook, or privacy, in terms of excessive noise, light or air pollution.
- The proposed development is car free (except for 5 wheelchair-accessible spaces) and high-quality storage for cycles is provided. The site's location is accessible in terms of public transport routes and the scheme is also supported by sustainable transport initiatives.
- High performance energy saving measures form part of the proposal, which would also include measures that would safeguard the amenity of future occupiers from excessive noise levels.
- The proposal would have a negligible impact on the historic built environment, which is considered acceptable when it is weighted against the public benefits of the proposal.

All other relevant policies and considerations, including equalities, have been taken into account. Planning permission should be granted for the reasons set out above. The details of the decision are set out in the RECOMMENDATION.

7.0 COMMUNITY INFRASTRUCTURE LEVY (CIL)

Based on the information given on the plans, the Mayoral CIL charge will be £277,393.18 (3902sqm x £71.09) and the Haringey CIL charge will be £222,780.87 (3,783 x £58.89) . This

will be collected by Haringey after/should the scheme is/be implemented and could be subject to surcharges for failure to assume liability, for failure to submit a commencement notice and/or for late payment, and subject to indexation in line with the RICS CIL Index. An informative will be attached advising the applicant of this charge. It is expected that the applicant will be eligible to claim social housing relief.

8.0 RECOMMENDATION

GRANT PERMISSION subject to conditions in Appendix 1.

APPENDIX 1.

Subject to the following condition(s):

Time Limit

1. The development hereby authorised must be begun not later than the expiration of 3 years from the date of this permission, failing which the permission shall be of no effect.

Reason: This condition is imposed by virtue of the provisions of the Planning & Compulsory Purchase Act 2004 and to prevent the accumulation of unimplemented planning permissions.

Approved Plans

2. The development hereby authorised shall be carried out in accordance with the following approved plans and specifications:

Existing Plans:

23/082/100 A1 1/200 Existing Site Survey P1,
23/082/200 A1 1/100 Existing Ground Floor Plan P1,
23/082/201 A1 1/100 Existing First Floor Plan P1,
23/082/300A A1 1/100 Existing Elevations P1,
23/082/300B A1 1/100 Existing Elevations P1,
23/082/400 A1 1/100 Existing Sections P1,

038-BL-PL-XX-XX-DR-A--200 A1 1/100 Demolition Plans P1,
038-BL-PL-XX-XX-DR-A--201 A1 1/100 Demolition Elevations P1.

Planning Drawings:

038-BL-PL-XX-SI-DR-A-0001 Site A2 1/500 Site Location Plan P1,
038-BL-PL-XX-SI-DR-A-0002 Site A2 1/500 Site Block Plan P2,
038-BL-PL-XX-GF-DR-A-1501 A1 1/100 Ground Floor Plan P5,
038-BL-PL-XX-01-DR-A-1502 A1 1/100 First Floor Plan P3,
038-BL-PL-XX-02-DR-A-1503 A1 1/100 Second Floor Plan P1,
038-BL-PL-XX-03-DR-A-1504 A1 1/100 Third Floor Plan P1,
038-BL-PL-XX-04-DR-A-1505 A1 1/100 Fourth Floor Plan P1,
038-BL-PL-XX-05-DR-A-1506 A1 1/100 Fifth Floor Plan P1,
038-BL-PL-XX-06-DR-A-1507 A1 1/100 Sixth Floor Plan P1,
038-BL-PL-XX-RP-DR-A-1508 A1 1/100 Roof Plan P2,
038-BL-PL-B1-EL-DR-A-1710 A2 1/100 Lawrence Road Elevation Front / West P1,
038-BL-PL-B1-EL-DR-A-1711 A2 1/100 B1 Elevation Rear / East P2,
038-BL-PL-B1-EL-DR-A-1712 A2 1/100 B2 Elevation Front / West P2,
038-BL-PL-B1-EL-DR-A-1713 A2 1/150 Site Elevation Side / North (No.28) P2,
038-BL-PL-B2-EL-DR-A-1714 A2 1/150 Site Elevation Side South (Vabel) P2,
038-BL-PL-B2-EL-DR-A-1715 A2 1/100 B2 Elevation Rear / East P1,
038-BL-PL-XX-SE-DR-A-1620 A2 1/150 Section A P2,
038-BL-PL-XX-SE-DR-A-1621 A2 1/100 Section B Commercial Unit P1,
038-BL-PL-XX-XX-DR-A-7500 A2 1/750 Urban Greening Factor Plans P1,

038-BL-PL-XX-XX-DAS-A A2 DAS P1.

Planning Documents:

- Community Infrastructure Levy Additional Information Form;
- Application Form and Ownership and Notices as Relevant;
- Arboricultural Impact Assessment;
- Arboricultural Method Statement;
- Tree Survey;
- Biodiversity Net Gain Assessment;
- BREEAM Pre-Assessment;
- Daylight and Sunlight Report;
- Delivery and Servicing Plan;
- Design and Access Statement;
- Existing and Proposed Drawings;

- Site Location Plan;
- Site/Block Plan;
- Energy & Sustainability Statement Revision C prepared by FHP ESS (dated 22 Aug 2024);
- GLA Emissions Reporting Sheet;
- Flood Risk Assessment (incl. SuDS Report) (rev P3);
- Framework Travel Plan;
- Ground Gas Risk Assessment;
- Townscape, Visual and Heritage Impact Assessment;
- Outline Construction Logistics Plan;
- Preliminary Investigation Report;
- Statement of Community Involvement; and
- Transport Assessment.
- Affordable housing - Registered Provider feedback (Oct 2024)

Reason: In order to avoid doubt and in the interests of good planning.

Materials and design detail

3. Prior to the commencement of above ground works detailed drawings (including sections) to a scale of 1:20 to confirm the detailed design and materials of the:
 - a) Detailed elevational treatment;
 - b) Detailing of roof and parapet treatment;
 - c) Windows and doors (including plan, elevation and section drawings indicating jamb, head, cill, reveal and surrounds of all external windows and doors at a scale of 1:10), which shall include a recess of at least 115mm;
 - d) Details of entrances and porches which shall include a recess of at least 115mm;
 - e) Details and locations of down pipes, rainwater pipes or foul pipes and all external vents;
 - f) Details of balustrading;
 - g) Facing brickwork: sample panels of proposed brickwork to be used showing the colour, texture, pointing, bond, mortar, and brickwork detailing shall be provided;
 - h) Details of cycle, refuse enclosures and plant room; and
 - i) Any other external materials to be used;

Together with a full schedule of the exact product references for all materials shall be submitted to and approved in writing by the Local Planning Authority. The development shall thereafter be carried out solely in accordance with the approved details.

Reason: To safeguard and enhance the visual amenities of the locality in compliance with Policies DM1, DM8 and DM9 of the Development Management Development Plan Document 2017.

Energy Strategy

4. The development hereby approved shall be constructed in accordance with the Energy & Sustainability Statement Revision D prepared by FHP ESS (dated 28 Aug 2024) delivering a minimum 82% improvement on carbon emissions over 2021 Building Regulations Part L (indicative subject to remodelling the latest design changes of January 2025), with high fabric efficiencies, COMMUNAL air source heat pumps (ASHPs) and aiming for 48 kWp solar photovoltaic (PV) array.

(a) Prior to above ground construction, a revised Energy Strategy shall be submitted to and approved in writing by the Local Planning Authority. This must include:

- Confirmation of how this development will meet the zero-carbon policy requirement in line with the Energy Hierarchy;
- Confirmation of the necessary fabric efficiencies to achieve a minimum 14% reduction;
- Details to reduce thermal bridging;
- Location, specification and efficiency of the proposed ASHPs (Coefficient of Performance, Seasonal Coefficient of Performance, and the Seasonal Performance Factor), with plans showing the ASHP pipework and noise and visual mitigation measures;
- Specification and efficiency of the proposed Mechanical Ventilation and Heat Recovery (MVHR), with plans showing the rigid MVHR ducting and location of the unit;
- Details of the PV, demonstrating the roof area has been maximised on both residential and non-residential blocks, 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); inverter capacity; and how the energy will be used on-site before exporting to the grid;
- Specification of any additional equipment installed to reduce carbon emissions, if relevant;
- A metering strategy

The development shall be carried out strictly in accordance with the details so approved prior to first operation and shall be maintained and retained for the lifetime of the development.

(b) The solar PV arrays and air source heat pumps must be installed and brought into use prior to first occupation of the relevant block. Six months following the first occupation of that block, evidence that the solar PV arrays have been installed correctly and are operational shall be submitted to and approved by the Local Planning Authority, including photographs of the solar array, installer confirmation, an energy generation statement for the period that the solar PV array has been installed, and a

Microgeneration Certification Scheme certificate. The solar PV array shall be installed with monitoring equipment prior to completion and shall be maintained at least annually thereafter.

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

Reason: To ensure the development reduces its impact on climate change by reducing carbon emissions on site in compliance with the Energy Hierarchy, and in line with London Plan (2021) Policy SI2, and Local Plan (2017) Policies SP4 and DM22.

Overheating - Residential

5. Prior to the above ground commencement of the development, an updated Overheating Report shall be submitted to and approved in writing by the Local Planning Authority. The submission shall assess the overheating risk and propose a retrofit plan. This assessment shall be based on the Overheating Assessment reported on the Energy & Sustainability Statement Revision C prepared by FHP ESS (dated 22 Aug 2024)

This report shall include:

- Revised modelling of units modelled based on CIBSE TM59, using the CIBSE TM49 London Weather Centre files for the DSY1-3 (2020s) and DSY1 2050s and 2080s, high emissions, 50% percentile;
- Demonstrating the mandatory pass for DSY1 2020s can be achieved following the Cooling Hierarchy and in compliance with Building Regulations Part O, demonstrating that any risk of crime, noise and air quality issues are mitigated appropriately evidenced by the proposed location and specification of measures;
- Review the validity of the acoustic recommendations;
- Specify the ventilation strategy, including: floorplans showing which habitable spaces will be predominantly naturally ventilated or mechanically ventilated, specification of the proposed mechanical ventilation (efficiency and air changes), window opening areas. This should also incorporate the acoustic report recommendations;
- Modelling of mitigation measures required to pass future weather files, clearly setting out which measures will be delivered before occupation and which measures will form part of the retrofit plan;
- Confirmation that the retrofit measures can be integrated within the design (e.g., if there is space for pipework to allow the retrofitting of cooling and ventilation equipment), setting out mitigation measures in line with the Cooling Hierarchy;
- Confirmation who will be responsible to mitigate the overheating risk once the development is occupied.

(a) Prior to occupation, the development must be built in accordance with the approved overheating measures and retained thereafter for the lifetime of the development:

- Natural ventilation, with openable areas 50% to full openable areas.
- Glazing g-value of 0.60
- Extended exterior window reveals for external shading.

- Extended roof slab supported by columns, acting as an overhang is provided for the 6th floor West facing windows in flats 6.2-6.6
- MVHR with 0.5 ach/hour in habitable rooms.
- No active cooling.
- Any further mitigation measures as approved by or superseded by the latest approved Overheating Strategy.

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.

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.

Overheating - non-residential

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

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

- The proposed occupancy profiles and heat gains in line with CIBSE TM52
- The modelled mitigation measures which will be delivered to ensure the development complies with DSY1 for the 2020s weather file.
- A retrofit plan that demonstrates which mitigation measures would be required to pass future weather files, with confirmation that the retrofit measures can be integrated within the design.

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

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

Living roofs

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

- i) A roof plan identifying where the living roofs will be located and a ground floor plan identifying where the living walls will be rooted in the ground, if any;
- ii) A section demonstrating settled substrate levels of no less than 120mm for extensive living roofs (varying depths of 120-180mm), and no less than 250mm for intensive living roofs (including planters on amenity roof terraces);
- iii) Roof plans annotating details of the substrate: showing at least two substrate types across the roof, annotating contours of the varying depths of substrate
- iv) Details of the proposed type of invertebrate habitat structures with a minimum of one feature per 30m² of living roof: substrate mounds and 0.5m high sandy piles in areas with the greatest structural support to provide a variation in habitat; semi-buried log piles / flat stones for invertebrates with a minimum footprint of 1m², rope coils, pebble mounds of water trays;
- v) Details on the range and seed spread of native species of (wild)flowers and herbs (minimum 10g/m²) and density of plug plants planted (minimum 20/m² with roof ball of plugs 25m³) to benefit native wildlife, suitable for the amount of direct sunshine/shading of the different living roof spaces. The living roof will not rely on one species of plant life such as Sedum (which are not native);
- vi) Roof plans and sections showing the relationship between the living roof areas and photovoltaic array; and
- vii) Management and maintenance plan, including frequency of watering arrangements.

(b) Prior to the occupation of the development, evidence must be submitted to and approved by the Local Planning Authority that the living roof has been delivered in line with the details set out in point

(c) 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 has not been delivered to the approved standards, the applicant shall rectify this to ensure it complies with the condition. The living roof shall be retained thereafter for the lifetime of the development in accordance with the approved management arrangements.

Reason: To ensure that the development provides the maximum provision towards the creation of habitats for biodiversity and supports the water retention on site during rainfall. In accordance with London Plan (2021) Policies G1, G5, G6, S11 and S12 and Local Plan (2017) Policies SP4, SP5, SP11 and SP13.

Delivery and Servicing Plan and Waste Management

8. Prior to occupation/use a Delivery and Servicing Plan (DSP) shall have been submitted to, and approved in writing by, the Local Planning Authority. The service and delivery plan must 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.

Details shall be provided on how deliveries can take place without impacting on the public highway, the document should be produced in line with TfL guidance.

The final DSP must be submitted at least 6 months before the site is occupied/used and must be reviewed annually in line with the travel plan for a period of 3 years unless otherwise agreed in writing by the Local Planning 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

Cycle Parking

9. No development shall take place until further details of the type and location of secure and covered cycle parking facilities have been submitted to and approved in writing by the Local Planning Authority. The quantity must be in line with the London Plan 2021 T5 Cycle and the design must be in line with the London Cycle Design Standard. The development shall not be occupied until the cycle parking facilities have been installed in accordance with the approved details. Such spaces shall be retained thereafter for this use only.

Reason: to be in accordance with the published London Plan 2021 Policy T5, and London Cycle Design Standards (LCDS)

Electric Vehicle Charging

10. Prior to occupation/use provision of 1 active and 4 passive electric vehicle charging points to serve the on-site parking spaces shall be provided. The facilities shall thereafter be retained for the lifetime of the development.

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.

Disabled parking bays

11. Prior to occupation/use, plans showing 10% of all homes having access to a wheelchair accessible car parking space shall have been submitted to, and approved in writing by, the Local Planning Authority.. The spaces shall be provided on-site, the plan will need to show 5 accessible car parking spaces.

Reason: to ensure the development is in accordance with the published London Plan 2021 T6.1 Residential parking.

Car Parking Management

12. Prior to occupation/use, a Car Parking Management Plan shall have been submitted to, and approved in writing by, the Local Planning Authority. This shall 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:

1) Wheelchair accessible homes or residents with a disability, with the need for a car parking space only

Reason: to ensure the development is in accordance with the published London Plan 2021 T6 Residential parking.

Thames Water

13. 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 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.

Land Contamination

14. Before development commences other than for investigative work:
 - a. Using the information already submitted in Preliminary Investigation Report with reference 20922/PIR Rev1.1 prepared by Soils Ltd., 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.
 - b. The risk assessment and refined Conceptual Model shall be submitted, along with the site investigation report, to the Local Planning Authority which shall be submitted to, and approved in writing by, the Local Planning Authority prior to that remediation being carried out on site.
 - c. Where remediation of contamination on the site is required, completion of the remediation detailed in the method statement shall be carried out and a report that provides verification that the required works have been carried out, shall be submitted to, and approved in writing by the Local Planning Authority before the development is occupied.

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

Unexpected Contamination (Pollution)

15. If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until a remediation strategy detailing how this

contamination will be dealt with has been submitted to and approved in writing by the Local Planning Authority. The remediation strategy shall be implemented as approved.

Reasons: To ensure that the development is not put at unacceptable risk from, or adversely affected by, unacceptable levels water pollution from previously unidentified contamination sources at the development site in line with paragraph 109 of the National Planning Policy Framework.

NRMM (Pollution)

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

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

Construction Environmental Management Plans (Pollution)

17. a. Development shall not commence until a Construction Environmental Management Plan (CEMP) has been submitted to and approved in writing by the local planning authority.

The following applies to Part a above:

- a) The CEMP shall include a Construction Logistics Plan (CLP) and Air Quality and Dust Management Plan (AQDMP).
- b) The CEMP shall provide details of how construction works are to be undertaken respectively and shall include:
 - i. A construction method statement which identifies the stages and details how works will be undertaken;
 - ii. Details of working hours, which unless otherwise agreed with the Local Planning Authority shall be limited to 08.00 to 18.00 Monday to Friday and 08.00 to 13.00 on Saturdays;
 - iii. Details of plant and machinery to be used during construction works;
 - iv. Details of an Unexploded Ordnance Survey;
 - v. Details of the waste management strategy;
 - vi. Details of community engagement arrangements;

- vii. Details of any acoustic hoarding;
- viii. A temporary drainage strategy and performance specification to control surface water runoff and Pollution Prevention Plan (in accordance with Environment Agency guidance);
- ix. Details of external lighting; and,
- x. Details of any other standard environmental management and control measures to be implemented.

c) The CLP will be in accordance with Transport for London's Construction Logistics Plan Guidance (July 2017) and shall provide details on:

- i. Monitoring and joint working arrangements, where appropriate;
- ii. Site access and car parking arrangements;
- iii. Delivery booking systems;
- iv. Agreed routes to/from the Plot;
- v. Timing of deliveries to and removals from the Plot (to avoid peak times, as agreed with Highways Authority, 07.00 to 9.00 and 16.00 to 18.00, where possible); and
- vi. Travel plans for staff/personnel involved in construction works to detail the measures to encourage sustainable travel to the Plot during the construction phase; and
- vii. Joint arrangements with neighbouring developers for staff parking, Lorry Parking and consolidation of facilities such as concrete batching.

d) The AQDMP will be in accordance with the Greater London Authority SPG Dust and Emissions Control (2014) and shall include:

- i. Mitigation measures to manage and minimise construction dust emissions during works;
- ii. Details confirming the Plot has been registered at <http://nrmm.london>;
- iii. Evidence of Non-Road Mobile Machinery (NRMM) and plant registration shall be available on site in the event of Local Authority Inspection;
- iv. An inventory of NRMM currently on site (machinery should be regularly serviced, and service logs kept on site, which includes proof of emission limits for equipment for inspection);
- v. A Dust Risk Assessment for the works; and
- vi. Lorry Parking, in joint arrangement where appropriate.

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

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

Waste

18. No development shall take place until a detailed scheme for the provision of refuse and waste storage and recycling facilities has been submitted to and approved in writing by the Local Planning Authority. Such a scheme as approved shall be implemented and permanently retained thereafter.

Reason: In order to protect the amenities of the locality and to comply with Policy DM4 of The Development Management DPD 2017 and Policy D6 of the London Plan 2021.

Secured by Design

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

Reason: To ensure safe and secure development and reduce crime

Secured by Design

20. 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.

Reason: To ensure safe and secure development and reduce crime

Trees

21. No development shall start until all those trees to be retained, as indicated on the approved drawings, have been protected by secure, stout, exclusion fencing erected at a minimum distance equivalent to the branch spread of the trees and in accordance with BS 3998:2010 and to a suitable height. Any works connected with the approved scheme within the branch spread of the trees shall be by hand only. No storage of materials, supplies or plant machinery shall be stored, parked, or allowed access beneath the branch spread of the trees or within the exclusion fencing.

Reason: In order to ensure the safety and wellbeing of the trees on the site during constructional works that are to remain after building works are completed.

Landscaping

22. Prior to the first occupation/use of the development hereby approved full details of both hard and soft landscape works shall be submitted to and approved in writing by the Local Planning Authority, and these works shall thereafter be carried out as approved. Details shall include information regarding, as appropriate:

- a) Proposed finished levels or contours;
- b) Means of enclosure;
- c) Hard surfacing materials including details of tonal contrasts between pedestrian, cycle and vehicle priority areas;
- d) Minor artefacts and structures (e.g. Furniture, play equipment, refuse or other storage units, wayfinding measures, signs, lighting etc.); and

Soft landscape works shall be supported by:

- e) Planting plans including a CAVAT assessment of existing and proposed trees;
- f) Written specifications (including details of cultivation and other operations)

associated with plant and/or grass establishment);

g) Schedules of plants, noting species, plant sizes and proposed numbers/densities where appropriate; and

h) Implementation and long-term management programmes (including a five-year irrigation plan for all new trees).

The soft landscaping scheme shall include detailed drawings of:

i) Existing trees to be retained;

j) Existing trees which will require thinning, pruning, pollarding or lopping as a result of this consent; and

k) Any new trees and shrubs, including street trees, to be planted together with a schedule of species which must include no less than nine new semi-mature trees

l) 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;

m) detailed final urban greening factor plan showing that a factor of greater than 0.4 has been achieved.

The approved scheme of planting, seeding or turfing comprised in the approved details of landscaping shall be carried out and implemented in strict accordance with the approved details in the first planting and seeding season following the occupation of the building or the completion of development (whichever is sooner). Any trees or plants, either existing or proposed, which, within a period of five years from the completion of the development die, are removed, become damaged or diseased shall be replaced in the next planting season with a similar size and species. The landscaping scheme, once implemented, is to be retained thereafter.

Reason: In order for the Local Planning Authority to assess the acceptability of any landscaping scheme, thereby ensuring a satisfactory setting for the proposed development in the interests of the visual amenity of the area consistent with Policy DM1 of the Development Management DPD 2017 and Policy SP11 of the Local Plan 2017

Surface Water Drainage

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

a) 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.

Reason: To ensure that the principles of Sustainable Drainage are incorporated into this proposal and maintained thereafter.

Surface Water Drainage

24. Prior to occupation/use 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.

Reason: To prevent increased risk of flooding to improve water quality and amenity to ensure future maintenance of the surface water drainage system

Part M

25. All residential units on site shall be built to Part M4(2) 'accessible and adaptable dwellings' of the Building Regulations 2013 (as amended), and at least 10% (eight dwellings) shall be wheelchair accessible or easily adaptable for wheelchair use in accordance with Part M4(3) of the same Regulations, unless otherwise agreed in writing in advance with the Local Planning Authority.

Reason: To ensure that the proposed development meets the Council's standards for the provision of wheelchair accessible dwellings in accordance with Local Plan 2017 Policy SP2 and London Plan Policy D7.

Energy

26. The approved development shall not be implemented unless and until verified estimates of the 'Be Seen' energy performance indicators have been submitted to the GLA via their online portal and evidence of this, plus a metering strategy, has been submitted to the Local Planning Authority for its written approval. The development shall thereafter be carried out in accordance with the agreed details.

Reason: To contribute towards sustainable development, energy reduction measures and climate change mitigation.

Trees

27. Prior to any above ground works, full details of 10 replacement trees, showing the, size and species of the replacement trees together with details of soil preparation, staking, irrigation and maintenance of the trees shall be submitted to and approved in writing by the local planning authority. Street trees shall be planted within twelve months of the removal of the existing trees, whilst on-site trees shall be planted within 6 months of development completion and shall be maintained thereafter and shall comply with the recommendations contained with BS8545 (2014) Trees: From Nursery to independence in the landscape and thereafter implemented in accordance with the approved details.

Reason: To ensure the continued amenity and environmental benefits provided by the trees and the planting of appropriate species.

Gates

28. Prior to the first occupation/use of the development hereby approved, details of Vehicular Gates including their design, operation and positioning shall be submitted to, and approved in writing by, the Local Planning Authority. Once approved works shall be implemented in accordance with the approved details and retained as such thereafter.

Reason: To ensure suitable access controls for vehicles are provided and to ensure the safety of the public highway.

Informatives:

INFORMATIVE : In dealing with this application, Haringey Council has implemented the requirements of the National Planning Policy Framework and of the Town and Country Planning (Development Management Procedure) (England) (Amendment No.2) Order 2012 to foster the delivery of sustainable development in a positive and proactive manner.

INFORMATIVE: CIL

Based on the information given on the plans, the Mayoral CIL charge will be £277,393.18 (3902sqm x £71.09) and the Haringey CIL charge will be £222,780.87 (3,783 x £58.89). This will be collected by Haringey after/should the scheme is/be implemented and could be subject to surcharges for failure to assume liability, for failure to submit a commencement notice and/or for late payment, and subject to indexation in line with the construction costs index.

INFORMATIVE: Hours of Construction Work

The applicant is advised that under the Control of Pollution Act 1974, construction work which will be audible at the site boundary will be restricted to the following hours:-

- 8.00am - 6.00pm Monday to Friday
- 8.00am - 1.00pm Saturday
- and not at all on Sundays and Bank Holidays.

INFORMATIVE: Party Wall Act

The applicant's attention is drawn to the Party Wall Act 1996 which sets out requirements for notice to be given to relevant adjoining owners of intended works on a shared wall, on a boundary or if excavations are to be carried out near a neighbouring building.

INFORMATIVE: Street numbering

The new development will require numbering. The applicant should contact the Local Land Charges at least six weeks before the development is occupied (tel. 020 8489 5573) to arrange for the allocation of a suitable address.

INFORMATIVE: Thames Water

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.

INFORMATIVE: Thames Water

A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will

undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 020 3577 9483 or by emailing trade.effluent@thameswater.co.uk . Application forms should be completed on line via www.thameswater.co.uk. Please refer to the Wholesale; Business customers; Groundwater discharges section.

INFORMATIVE: Thames Water

Thames Water would recommend that petrol / oil interceptors be fitted in all car parking/washing/repair facilities. Failure to enforce the effective use of petrol / oil interceptors could result in oil-polluted discharges entering local watercourses

INFORMATIVE: Thames Water

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

INFORMATIVE: Pollution

Prior to demolition 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.

INFORMATIVE: Secured by Design

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.

Appendix 2 Consultation Responses from internal and external agencies

Stakeholder	Question/Comment	Response
INTERNAL		
Transportation	<p>Proposal: Alterations and extension to existing building (Class E) and erection of residential building (Class C3) including ground floor commercial (Class E), cycle and car parking, hard and soft landscaping, and all other associated works.</p> <p>Description</p> <p>An application has been received seeking planning permission to alter and extend the building which is a commercial Class E and erect a residential building Class C3, including ground floor commercial Class E, with associated cycle and car parking. The proposal site is currently a warehouse occupied by a commercial laundry business, with a car park which has 20 parking spaces. The development would provide 5 on-site disabled car parking spaces which are located within an internal forecourt and accessed via a new vehicle crossover. The spaces would be provided with 1 active and 4 passive electric vehicle charging points. The development would look to provide 103 long-stay cycle parking spaces and 23 short-stay cycle parking spaces for residents and for the commercial element of the proposal 12 long-stay cycle parking and 6 short-stay cycle parking spaces. It is currently unknown who will inhabit the workspace/commercial units, and no information has been provided on the number of potential employees.</p> <p>The proposal site has a PTAL rating of 3 indicating that its access to public transport is reasonably good when compared to London as a whole suggesting that there will be a strong reliance on the private car for trip making. However, it should be noted that the southern part of Lawrence Road consists of PTAL 4 and 5. The site is located within the Seven Sisters CPZ that restricts parking to permits holder Monday to Saturday 08:00 – 18:30.</p> <p>The proposal has an existing vehicle access which fronts onto Lawrence Road which is an adopted highway and has a width of approximately 10.2m, although this is further decreased to c.6.5m due to on-street resident bays located on both sides of the road. The proposal site has convenient access to shops, services, and transport links. Seven Sisters Underground Station is only around 11min walk and 3.min bike ride, furthermore the station also provides access to London Overground services. Multiple bus services can be accessed on West Green Road which provides connections to the west and to the east of the borough.</p>	Noted conditions/ Planning Obligations attached.

Stakeholder	Question/Comment	Response
	<p>Unit mix</p> <p>Proposed: 25 x 1 bedroom, 22 x 2 bedroom, and 9 x 3 bedroom.</p> <p>Commercial floorspace Existing: 1,834 sqm Proposed: 1,711 sqm</p> <p>Trip generation Trip information has been provided which utilises data from survey sites from the TRICS database, 4 residential site survey were used, and information has been provided on them with them being comparable in size to this site. No trip information has been provided for the commercial element of the proposal as there will be a slight reduction in the floor area by some 162sqm which is likely to generate fewer commercial trips when compared to the existing floor area of some 1,834 sqm.</p> <p>However, given the reduction in the number of available car parking space with the existing commercial unit having access to some 20 on-street car parking spaces, there is a risk that whilst there will be less trips generated by the new proposal the on street car parking demand may increase as a result of there being less car parking spaces available to facilitate the vehicular trips generated by the site.</p> <p>With regards to the residential trip information the site is predicted to produce the following two way person trip rates: 36 AM and 37 PM, the total daily two-way trip rates will be 372 trips. Modal split data has been presented in terms of Method of Travel to work data from the 2011 census. The modal split has been amended to reflect the car free nature of the site with only 5 disabled car parking spaces provided. The most used mode of transport is by the Underground with a percentage of 47%, second buses at 25.6%, third is walking at 9.2%.</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 25 x 1 bedroom, 22 x 2 bedroom,</p>	

Stakeholder	Question/Comment	Response
	<p>and 9 x 3-bedroom 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 moderately good PTAL., given the PTAL of the site and its close proximity to public transport links the development will be Car-Capped in line 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>The published London Plan 2021 T6.1 Residential Parking states that disabled person's parking should be provided for new residential developments delivering 10 or more units. As a minimum 3% of dwellings must have at least 1 designated disabled persons parking bay from the outset. This Policy further requires that new developments be able to demonstrate as part of a Parking Design and Management Plan, how an additional 7% of dwellings could be provided with 1 designated disabled person's parking space per dwelling in future upon request as soon as the existing provision is insufficient.</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 5 accessible parking spaces. All accessible bays associated with the development must be for resident use only, leased rather than sold, and be designated according to the design guidance BS8300vol.1.</p> <p>The site would include workspace/commercial floorspace with an area of 1,711 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 'all proposals should include an appropriate amount of Blue Badge parking, providing at least one space even if no general parking is provided'. On Lawrence Road south of the site there are 6 disabled bays, a parking stress survey was completed over two nights which shows the parking stress for</p>	

Stakeholder	Question/Comment	Response
	<p>the bays is between 67% and 83%.</p> <p>The applicant/developer has suggested that they would provide further funding towards the conversion of on-street residential bays if further demand is expected from the development in terms of disabled bays parking, this can be secured via a S.106 legal agreement. We will require a planning condition for the management of the 5 disabled car parking bays via a car parking management plan to manage how they will be allocated.</p> <p>Electric vehicle charging For the proposal to be in accordance with policy it will need to comply with the published London Plan 2021 Policy T6.1 Residential Parking which requires that '20 per cent of spaces should have active charging facilities, with passive provision for all remaining spaces'. The submitted Transport Statement makes mention that 1 disabled bay will be supported with via an active charging point, with the rest having passive capabilities. Therefore, the development is in accordance with this policy. LBH Transport Planning will require a pre-commencement condition stipulating that a more detailed plan be submitted for approval showing 1 active, and 4 passive vehicle charging points.</p> <p>Future parking demands A parking stress survey was conducted, which utilised the Lambeth Methodology covering an area of 200m, utilising 5.5m vehicle lengths, and was completed over two weekday nights. It showed on-street resident parking stress on both days averaged between 59% - 64%. However, Lawrence Road experienced higher parking stress of between 79%-87%, this illustrates that the road is close to its capacity. Parking management measures will be required in the form of a review of the current parking management measures which may include extended double yellow lines with double blips at junctions and a review of the current CPZ operational times. We will therefore require a contribution of £20,000 (twenty Thousand Pounds) from the applicant to undertake a review of the current parking management measures on Lawrence Road and the surrounding road for the implementation of parking and loading measures and potential changes to the CPZ operational hours.</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 Cycle requires that developments 'provide the provision of appropriate levels of cycle parking which</p>	

Stakeholder	Question/Comment	Response
	<p>should be fit for purpose, secure and well-located and be in accordance with the minimum standards. The residential use of the development would see the provision of 103 long-stay cycle parking spaces and 23 short-stay cycle parking spaces, the policy only requires that they provide 100 long-stay and 2 short-stay. Therefore, they are supplying a significantly higher number of cycle parking than what is required, this is welcomed by LBH Transport Planning. With regards to the workspace/commercial elements the developer/applicant has used Use Class B1 Business offices which requires 1 space per 150 for long-stay and 1 space per 500 sqm. The applicant will be required to provide 12 long-stay cycle parking spaces and 3 short-stay cycle parking spaces, the applicant is proposing to provide 12 long-stay cycle parking space and 6 short-stay cycle parking which is above what is required.</p> <p>The location and some details on the design of the cycle parking has been given. The residential long stay would be located within two large bike store that will utilise both two-tier racks and Sheffield stands. The two-tier racks in both locations will have aisle widths of 2.1m and 4.2m, though this does not meet the minimum aisle width of 2.5m within the LCDS for two-tier racks, but they exceed the minimum head height requirements of 2.6m. All of the Sheffield stands appear to have a space between each other of just 1m, this is not in line with the London Cycle Design Standard (LCDS) which requires perpendicular Sheffield stand cycle parking to have a minimum width between each other of 1.2m.</p> <p>The sites entire provision of short-stay cycle parking will be provided via Sheffield stand with 3 cycle stand locations fronting onto Lawrence Road and another will be located North of the site that can be accessed via gate from Lawrence Road. Overall, it does not appear that they will be sheltered which does not provide any protection from the elements, furthermore this would not be in accordance with the LCDS principles of cycle parking being fit-for-purpose, secure, and well-located. The long stay for the workspace/commercial element will be provided within the larger unit, though it is not understood how these will function as they appear to be provided on the main floorspace, and not out of the way. The smaller commercial units that front onto Lawrence Road do not appear to have access to long-stay cycle parking, therefore it is difficult how employees of these units will benefit from the sites secured cycle parking. All designs will need to be elaborated upon with the submission of plans for approval to identify how they will meet or exceed the standards set out in Transport for London's LCDS.</p> <p>Details relating to the bike store will be secured by a pre-commencement planning condition requiring the applicant to submit details of cycle parking spaces in line with the London Plan</p>	

Stakeholder	Question/Comment	Response
	<p>2021Policy 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>Highways works. Some highway works have been proposed as the development will remove the existing 11.6m vehicle access and reinstatement of the footway, this will enable on-street parking bays on-street to be restored if needed. Furthermore, a new smaller 7m access is proposed to serve the 5 disabled bays on-plot. Though this would require the removal of 2 on-street parking bays. In all, these works would be considered minor to facilitate the operations of the site, although as the footway is in quite some disrepair the development will need to contribute toward the repair of the footway that the site fronts onto. 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>Car clubs The closest car club bay is located on Bedford Road which is approximately around 5-minute walk from the site. Given the scale of this development with respect to the residential elements LBH Transport Planning will require the applicant/developer to work with a car club operator to provide extra bays within the vicinity of this site, which resident can make use of. This is to ensure that there is sufficient supply within the immediate area to satisfy future demand given the size of the future development. Additionally, 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 the CPZs are not in operation. Therefore, the applicant/developer will be required to liaise with local car club operators who will advise on the local coverage and whether the applicant should be funding any new bays/cars in the locality to the site to meet future demand from the development. The applicant will also be required to provide 5 years of car club membership for each residential unit, along with £100 driving credit for each resident. 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>Access An Active Travel Zone (ATZ) has been produced and submitted as part of the Transport Statement. 4 walking routes to key destinations were analysed and assessed against the Healthy Streets indicators.</p>	

Stakeholder	Question/Comment	Response
	<p>These routes were:</p> <ul style="list-style-type: none"> • Route 1: Site to/from Park View School via Downhills Park & Harris Primary Academy. • Route 2: Site to/from Seven Sisters Underground Station via Sainsbury's Local & West Green Road Post Office. • Route 3: Site to/from Seven Sisters Overground Station. • Route 4: Site to/from Tottenham Green Pools & Fitness. <p>Some of the recommendations for improvements to these routes include the installation of dropped kerbs and tactile paving, additional crossing point to the west of the Philip Lane/Downhills Park Road Roundabout, planting of new trees, improved bus services along Philip Lane, improved CCTV and lighting, repaving of the footways, addition of step-free access to Seven Sisters Overground, cycle infrastructure improvements, and new street furniture e.g. benches.</p> <p>The Transport Statement includes collision data that has been sourced from Transport for London (TfL). It covers a period of 5 years from until November 2023 and the data has been plotted on a map, with it only showing serious casualty collision.</p> <ul style="list-style-type: none"> • Cluster 1: near to the roundabout with Philip Lane and Downhills Park Road 2 serious collision one pedestrian and one cyclist. • Cluster 2: on West Green Road near to the junction with Seven Sisters 2 serious collisions, involved 2 pedestrians • Cluster 3: on the junction with the High Road, West Green Road, and Broad Lane, involved moped, cyclist, car, light goods vehicle, and pedestrian. <p>No recommendations have been given on addressing some of these clusters by the developer.</p> <p>Service and delivery.</p> <p>A draft service and delivery plan has been received as part of the application. All deliveries are proposed to be undertaken within a c.15m loading north of the site. The loading bay operates via the following times 08:00 – 18:30. No information has been presented on the bay's capacity given much of the road has been converted to residential dwellings. The smallest vehicle which is envisaged to make deliveries to the site would be a 5.4m long sprinter van and the biggest would be a 10m long rigid vehicle. Trip information has been provided for both the residential and commercial aspects of the development. The trip information has been gathered from on-</p>	

Stakeholder	Question/Comment	Response
	<p>site traffic surveys conducted over two periods on Lawrence Road. The residential dwellings and the commercial use are expected to generate between 17-19 trips a day, though the length of time that is based upon has not been given. These numbers could change depending on the end occupier of the commercial units and number of deliveries that the residents receive.</p> <p>Refuse collection will be completed on street via existing conditions in line with the current collection on Lawrence Road. There will be three bin stores that can be accessed within the car parking area. It is envisaged that for the residential use that staff working for a management company will move the bins from the stores to a location off the public footway in order for the bins to be within the 10m distances that refuse operatives can travel from the refuse vehicle to the bin location. No further information has been provided on where this exactly will take place. The commercial bins will be collected via a private operator.</p> <p>The above issues can be addressed via the submission of a service and delivery plan to manage deliveries access to the site and to limit the number of trips to the site in order to manage the impact on the highway network.</p> <p>Travel Plan A draft Travel Plan has been received which covers both uses of the development in the form of resident and employees. Baseline trip information has been provided for all uses of the site, with a focus on the ones that apply to the targets that they have set themselves. This includes increasing walking, cycling by 5% and a decrease of 10% in public transport usage. Given the total number of potential users to the site the number of public transport users should not be decreasing, whilst active travel sees improvements within the forecast. Furthermore, it is not understood why public transport usage levels should drop when modes like cycling are not always available to those with disabilities and other car usage decreases users should be switching to public transport. Overall, LBH Transport Planning generally accept the content of the document, though there are areas which have been highlighted that will need to be improved upon for when a document is received as part of the S.106 planning obligation. There will be a Travel Plan Monitoring Fee per year for the first 5 years for separate commercial, and residential travel plans of the development, and this will be covered by way of a S.106 obligation.</p> <p>Construction and logistics A construction logistics plan outline has been developed and submitted as part of the</p>	

Stakeholder	Question/Comment	Response
	<p>application. It sets out the principles of how the development will be built including: programme of works, vehicle routing/access, trip generation, monitoring, and existing conditions on Lawrence Road. Vehicle types have been provided, the largest will be a 16.4m HGV used for the purposes of deliveries, it an enter and leave without though it does block access to the site from its only vehicle entrance. deliveries would need to be planned where they are not occurring at the same time of other vehicles needing access to the site. The smallest vehicle will be an 8.3m concrete mixer. Overall, the drawings are acceptable, but some movements do appear to result in close proximity to parked cars, this may need to be reviewed with a further parking stress survey to determine occupancy levels during construction.</p> <p>A staff travel plan will be created, though this will need effective monitoring to ensure that no worker is travelling by car to the site and parking locally. Estimated trip information has been given which shows peak vehicle movements to/from the site will be as high as 60 a month from start of the programme of works to completion. Any parking restrictions or closure of the footways 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. Finally, before construction has begun a general highway survey will need to be carried at to ascertain the condition of the footway and highway and to determine if vehicle accesses will need to be reinforced.</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 Officers, and the outcomes of these conversations will need to inform the finished CLP.</p> <p>A CLP draft 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. • Gives 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 	

Stakeholder	Question/Comment	Response
	<p>and peak road congestion.</p> <ul style="list-style-type: none"> • 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 construction activities on site.</p> <p>Recommendation There are no highway objections to this proposal subject to the following conditions, S.106 and S.278 obligations.</p> <p>Conditions 1. Delivery and Servicing Plan and Waste Management The owner shall be required to submit a Delivery and Servicing Plan (DSP) for the local authority's approval. The DSP must be in place prior to occupation of the development. The service and delivery plan must also include a waste management plan which includes details of how refuse is to be collected from the site, the plan should be prepared in line with the requirements of the Council's waste management service which must ensure that all bins are within 10 metres carrying 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. 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.</p> <p>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>	

Stakeholder	Question/Comment	Response
	<p>2. Cycle Parking The applicant will be required to submit plans showing accessible; sheltered, and secure cycle parking for 103 long-stay and 23 short-stay cycle parking spaces for residents and for the commercial 12 long-stay cycle parking spaces and 6 short-stay cycle parking spaces for approval. The quantity must be in line with the London Plan 2021 T5 Cycle and the design must be in line with the London Cycle Design Standard. No Development (including demolition) shall take place on site until the details have been submitted and approved in writing by the Council. Reason: to be in accordance with the published London Plan 2021 Policy T5, and London Cycle Design Standards (LCDS).</p> <p>3. Electric Vehicle Charging Subject to a condition requiring the provision of 1 active and 4 passive electric vehicle charging points to serve the on-site parking spaces from the onset. 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>4. Disabled parking bays The applicant will be required to submit and provide plans showing 10% of all units having access to a wheelchair accessible car parking space from the onset; this must be submitted for approval before any development commences on site. The spaces should be provided on-site, the plan will need to show 5 disabled car parking spaces. Reason: to ensure the development is in accordance with the published London Plan 2021 T6.1 Residential parking.</p> <p>5. Car Parking Management Plan 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> <p>1) Wheelchair accessible units or residents with a disability with the need for a car parking space only.</p>	

Stakeholder	Question/Comment	Response
	<p>S.106 obligations</p> <p>1. Car-Free Agreement The owner is required to enter into a Section 106 Agreement to ensure that the residential units are defined as "car free" and therefore no residents therein will be entitled to apply for a residents parking permit under the terms of the relevant Traffic Management Order (TMO) controlling on street parking in the vicinity of the development. The applicant must contribute a sum of £4000 (four thousand pounds) towards the amendment of the Traffic Management Order for this purpose.</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>2. Construction Logistics and Management Plan The applicant/developer is required to submit a Construction Logistics and Management Plan, 6 months (six months) prior to the commencement of development and approved in writing by the local planning authority. The applicant will be required to contribute, by way of a Section 106 agreement, a sum of £15,000 (fifteen thousand pounds) to cover officer time required to administer and oversee the arrangements and ensure highways impacts are managed to minimise nuisance for other highways users, local residents and businesses. The plan shall include the following matters, but not limited to, and the development shall be undertaken in accordance with the details as approved:</p> <ul style="list-style-type: none"> a) Routing of excavation and construction vehicles, including a response to existing or known projected major building works at other sites in the vicinity and local works on the highway. b) The estimated number and type of vehicles per day/week. c) Estimates for the number and type of parking suspensions that will be required. d) Details of measures to protect pedestrians and other highway users from construction activities on the highway. e) The undertaking of a 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. 	

Stakeholder	Question/Comment	Response
	<p>i) Swept path drawings.</p> <p>Reason: To provide the framework for understanding and managing construction vehicle activity into and out of a proposed development in combination with other sites in the Wood Green area and to encourage modal shift and reducing overall vehicle numbers. To give the Council an overview of the expected logistics activity during the construction programme. To protect the amenity of neighbouring properties and to maintain traffic safety.</p> <p>3. Car Club Membership The applicant will be required to enter into a Section 106 Agreement to establish a car club scheme, including the provision of adequate car club bays and associated costs, and must include the provision of five years' free membership for all residents and £100 (one hundred pounds in credit) per year/per unit for the first 5 years. Reason: To enable residential and student occupiers to consider sustainable transport options, as part of the measures to limit any net increase in travel movements.</p> <p>4. Commercial Travel Plan A commercial travel plan must be secured by the S.106 agreement and submitted 6 months before occupation. As part of the travel plan, the following measures must be included in order to maximise the use of public transport.</p> <p>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:</p> <p>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.</p> <p>c) The applicant will be required to provide, showers lockers and changing room facility for the commercial element of the development.</p> <p>d)The developer is required to pay a sum of £2,000 (two thousand pounds) per year per travel plan for monitoring of the travel plan for a period of 5 years. This must be secured by S.106 agreement.</p> <p>e) The first surveys should be completed 6 months post occupation or on 50% occupation whichever is sooner.</p>	

Stakeholder	Question/Comment	Response
	<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>5. Residential Travel Plan</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 in order to maximise the use of sustainable modes of transport.</p> <p>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.</p> <p>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.</p> <p>c) The applicant is required to pay a sum of, £3,000 (three thousand pounds) per year for a period of five years. £15,000 (fifteen thousand pounds) in total for the monitoring of the travel plan initiatives.</p> <p>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> <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>6. Highway Improvements</p> <p>The applicant will be required to enter into agreement with the Highway Authority under Section: 278 of the Highways Act, to pay for any necessary highway works, which includes if required, but not limited to, footway improvement works, access to the Highway, measures for street furniture relocation, carriageway markings, and access and visibility safety requirements, improved pedestrian and cycling infrastructure. The developer will be required to provide details of any temporary highways including temporary TMO's required to enable the occupation of</p>	

Stakeholder	Question/Comment	Response
	<p>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: Works on Lawrence Road for the reconstruction/reinstatement of the footway and the installation of a new vehicle crossover, removal and installation of on-street parking bays, and the repair of the footway. The applicant will be required to provide a detailed design for including lighting improvements, details will also be required in relation to the proposed works including but not limited to: widening, including adoption and long-term maintenance, the drawing should include, existing conditions surveys construction details, signing and lining, the scheme should be design in line with the 'Healthy Streets' indicators perspective, full list of requirements to be agreed with the Highways Authority</p> <p>The applicant will be required to submit detailed drawings 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> <p>Reason: To implement the proposed highways works to facilitate future access to the development Site and to protect the integrity of the highways network.</p> <p>7. Parking management contribution. We will require a contribution of £20,000 (twenty Thousand Pounds) from the applicant to undertake a review of the current parking management measures on Lawrence Road and the surrounding road for the implementation of parking and loading measures and potential changes to the CPZ operational hours.</p> <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>ADDITIONAL/REVISED COMMENTS</p> <p>Access/gate</p> <p>Can you please include a pre-commence condition for plans to be sent to LBH Transport Planning for approval demonstrating the design of the vehicle gates, how it will be operated, submission of visibility splays and how the gate will be set back so that a vehicle can be fully berthed on their site not impeding the free flow of pedestrians on the public footway.</p>	

Stakeholder	Question/Comment	Response
	<p>S278 agreement The applicant will be required to enter into agreement with the Highway Authority under Section: 278 of the Highways Act, to pay for any necessary highway works, which includes if required, but not limited to, footway improvement works, access to the Highway, measures for street furniture relocation, carriageway markings, and access and visibility safety requirements, improved pedestrian and cycling infrastructure. The developer will be required to provide details of any temporary highways including temporary TMO's required to enable the 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: Works on Lawrence Road for the reconstruction/reinstatement of the footway and the installation of two new vehicle crossovers, removal and installation of on-street parking bays, and the repair of the footway.</p> <p>The applicant will be required to provide a detailed design for including lighting improvements, details will also be required in relation to the proposed works including but not limited to: widening, including adoption and long-term maintenance, the drawing should include, existing conditions surveys construction details, signing and lining, the scheme should be design in line with the 'Healthy Streets' indicators perspective, full list of requirements to be agreed with the Highways Authority.</p> <p>The applicant will be required to submit detailed drawings 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. Reason: To implement the proposed highways works to facilitate future access to the development Site and to protect the integrity of the highways network.</p> <p>Cycle parking</p> <p>The applicant will be required to submit plans showing accessible; sheltered, and secure cycle parking for 103 long-stay and 23 short-stay cycle parking spaces for residents and for the commercial 8 long-stay cycle parking spaces and 2 short-stay cycle parking spaces for approval. The quantity must be in line with the London Plan 2021 T5 Cycle and the design must be in line with the London Cycle Design Standard. No Development (including demolition) shall take place on site until the details have been submitted and approved in writing by the Council.</p>	

Stakeholder	Question/Comment	Response														
	<p>REASON: to be in accordance with the published London Plan 2021 Policy T5, and London Cycle Design Standards (LCDS).</p> <p>Again, can the cycling condition be secured as a pre-occupation as it will influence final design of the cycle parking that they build.</p>															
Carbon Management/ Energy & Sustainability	<p>In preparing this consultation response, we have reviewed:</p> <ul style="list-style-type: none">• Energy & Sustainability Statement Revision D prepared by FHP ESS (dated 28 Aug 2024)• Relevant supporting documents. <p>1. Summary</p> <p>The applicant has revised the Energy and Sustainability Statement and the energy assessment output sheets (BRUKL sheet), with minor amendments. The overall carbon reduction does not change, and the development achieves 82% carbon emission reduction against Part L 2021, which is supported.</p> <p>Appropriate conditions have been recommended.</p> <p>2. Energy Strategy</p> <p>The applicant has amended the u-values in the submitted BRUKL sheet which is consistent with the GLA carbon emission reporting spreadsheet and the energy report.</p> <p>The revised carbon reduction summary is presented in the table below:</p> <table><tr><th>Non-Residential</th><th colspan="3">Residential</th><th colspan="3">Non-residential</th></tr><tr><td>(SAP10 emission factors)</td><td>Total regulated emissions (tCO₂/y)</td><td>CO₂ savings (tCO₂/y)</td><td>Percentage savings (%)</td><td>Total regulated emissions (tCO₂/y)</td><td>CO₂ savings (tCO₂/y)</td><td>Percentage savings (%)</td></tr></table>	Non-Residential	Residential			Non-residential			(SAP10 emission factors)	Total regulated emissions (tCO ₂ /y)	CO ₂ savings (tCO ₂ /y)	Percentage savings (%)	Total regulated emissions (tCO ₂ /y)	CO ₂ savings (tCO ₂ /y)	Percentage savings (%)	Noted conditions/ Planning Obligations attached.
Non-Residential	Residential			Non-residential												
(SAP10 emission factors)	Total regulated emissions (tCO ₂ /y)	CO ₂ savings (tCO ₂ /y)	Percentage savings (%)	Total regulated emissions (tCO ₂ /y)	CO ₂ savings (tCO ₂ /y)	Percentage savings (%)										

Stakeholder	Question/Comment							Response		
	Part L 2021 Baseline	47.8			8.2					
	Be Lean savings	42.9	4.9	10%	5.3	2.9	35%			
	Be Clean savings	42.9	0.0	0%	5.3	0.0	0%			
	Be Green savings	10.7	32.2	67%	-0.6	5.9	73%			
	Cumulative savings		37.1	78%		8.8	108%			
	Carbon shortfall to offset (tCO ₂)	10.7			-0.6					
	Site-wide (SAP10.2 emission factors)									
		Total regulated emissions (Tonnes CO ₂ / year)		CO ₂ savings (Tonnes CO ₂ / year)		Percentage savings (%)				
	Part L 2021 baseline	56.0								
	Be Lean	48.2		7.8		14%				
	Be Clean	48.2		0.0		0%				
	Be Green	10.0		38.1		68%				
	Cumulative savings	-		45.9		82%				
	Carbon shortfall to offset (tCO ₂)	10.0								
	Carbon offset contribution	£95 x 30 years x 10.0 tCO ₂ /year = £28,500								
	10% management fee	£2,850								
	3. Carbon Offset Contribution									
	An indicative carbon shortfall of 10.0 tCO ₂ /year remains. The remaining carbon emissions will need to be offset at £95/tCO ₂ over 30 years.									

Stakeholder	Question/Comment	Response
	<p>4. Planning Conditions</p> <p>To be secured with amendments expected to the wording below once the revised information has been submitted.</p> <p>Energy strategy</p> <p><i>The development hereby approved shall be constructed in accordance with the Energy & Sustainability Statement Revision D prepared by FHP ESS (dated 28 Aug 2024) delivering a minimum 82% improvement on carbon emissions over 2021 Building Regulations Part L, with high fabric efficiencies, COMMUNAL air source heat pumps (ASHPs) and a minimum 48 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> <ul style="list-style-type: none"> - <i>Confirmation of how this development will meet the zero-carbon policy requirement in line with the Energy Hierarchy;</i> - <i>Confirmation of the necessary fabric efficiencies to achieve a minimum 14% reduction;</i> - <i>Details to reduce thermal bridging;</i> - <i>Location, specification and efficiency of the proposed ASHPs (Coefficient of Performance, Seasonal Coefficient of Performance, and the Seasonal Performance Factor), with plans showing the ASHP pipework and noise and visual mitigation measures;</i> - <i>Specification and efficiency of the proposed Mechanical Ventilation and Heat Recovery (MVHR), with plans showing the rigid MVHR ducting and location of the unit;</i> - <i>Details of the PV, demonstrating the roof area has been maximised on both residential and non-residential blocks, 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); inverter capacity; and how the energy will be used on-site before exporting to the grid;</i> - <i>Specification of any additional equipment installed to reduce carbon emissions, if relevant;</i> - <i>A metering strategy</i> <p><i>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.</i></p>	

Stakeholder	Question/Comment	Response
	<p><i>(b) The solar PV arrays and air source heat pumps must be installed and brought into use prior to first occupation of the relevant block. Six months following the first occupation of that block, evidence that the solar PV arrays have been installed correctly and are operational shall be submitted to and approved by the Local Planning Authority, including photographs of the solar array, installer confirmation, an energy generation statement for the period that the solar PV array has been installed, and a Microgeneration Certification Scheme certificate. The solar PV array shall be installed with monitoring equipment prior to completion and shall be maintained at least annually thereafter.</i></p> <p><i>(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.</i></p> <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>Overheating - residential</p> <p><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 and propose a retrofit plan. This assessment shall be based on the Overheating Assessment reported on the Energy & Sustainability Statement Revision C prepared by FHP ESS (dated 22 Aug 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;</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;</i> <i>- Review the validity of the acoustic recommendations;</i> <i>- Specify the ventilation strategy, including: floorplans showing which habitable spaces will</i> 	

Stakeholder	Question/Comment	Response
	<p><i>be predominantly naturally ventilated or mechanically ventilated, specification of the proposed mechanical ventilation (efficiency and air changes), window opening areas. This should also incorporate the acoustic report recommendations;</i></p> <ul style="list-style-type: none"> - <i>Modelling of mitigation measures required to pass future weather files, clearly setting out which measures will be delivered before occupation and which measures will form part of the retrofit plan;</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;</i> - <i>Confirmation who will be responsible to mitigate the overheating risk once the development is occupied.</i> <p><i>(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.</i></p> <p><i>(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:</i></p> <ul style="list-style-type: none"> - <i>Natural ventilation, with openable areas 50% to full openable areas.</i> - <i>Glazing g-value of 0.60</i> - <i>Extended exterior window reveals for external shading.</i> - <i>Extended roof slab supported by columns, acting as an overhang is provided for the 6th floor West facing windows in flats 6.2-6.6</i> - <i>MVHR with 0.5 ach/hour in habitable rooms.</i> - <i>No active cooling.</i> - <i>Any further mitigation measures as approved by or superseded by the latest approved Overheating Strategy.</i> <p><i>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.</i></p> <p><i>REASON: In the interest of reducing the impacts of climate change, to enable the Local</i></p>	

Stakeholder	Question/Comment	Response
	<p><i>Planning Authority to assess overheating risk and to ensure that any necessary mitigation measures are implemented prior to construction, and maintained, in accordance with London Plan (2021) Policy SI4 and Local Plan (2017) Policies SP4 and DM21.</i></p> <p>Overheating – non-residential <i>At least six months prior to the occupation of each non-residential area, an Overheating Report must be submitted to and approved by the Local Planning Authority if that space is to be occupied for an extended period of time or will accommodate any vulnerable users, such as office/workspace, community, healthcare, or educational uses.</i></p> <p><i>The report shall be based on the current and future weather files for 2020s, 2050s and 2080s for the CIBSE TM49 central London dataset. It shall set out:</i></p> <ul style="list-style-type: none"> - <i>The proposed occupancy profiles and heat gains in line with CIBSE TM52</i> - <i>The modelled mitigation measures which will be delivered to ensure the development complies with DSY1 for the 2020s weather file.</i> - <i>A retrofit plan that demonstrates which mitigation measures would be required to pass future weather files, with confirmation that the retrofit measures can be integrated within the design.</i> <p><i>The mitigation measures hereby approved shall be implemented prior to occupation and retained thereafter for the lifetime of the development.</i></p> <p><i>REASON: In the interest of reducing the impacts of climate change, to enable the Local Planning Authority to assess overheating risk and to ensure that any necessary mitigation measures are implemented prior to construction, and maintained, in accordance with London Plan (2021) Policy SI4 and Local Plan (2017) Policies SP4 and DM21.</i></p> <p>BREEAM Certificate a) <i>Prior to commencement on site for the relevant non-residential unit, a Design Stage Assessment and evidence that the relevant information has been submitted to the BRE for a design stage accreditation certificate must be submitted to the Local Planning Authority confirming that the development will achieve a BREEAM “Very Good” outcome (or equivalent), aiming for “Excellent”. This should be accompanied by a tracker demonstrating which credits are being targeted, and why other credits cannot be met on site.</i></p>	

Stakeholder	Question/Comment	Response
	<p>b) <i>Within 6 months of commencement on site, the Design Stage Accreditation Certificate must be submitted. The development shall then be constructed in strict accordance with the details so approved, shall achieve the agreed rating and shall be maintained as such thereafter for the lifetime of the development.</i></p> <p>c) <i>Prior to occupation, the Post-Construction Stage Assessment and tool, and evidence that this has been submitted to BRE should be submitted for approval, confirming that the development has achieved a BREEAM “Very Good” outcome (or equivalent), aiming for “Excellent”, subject to certification by BRE.</i></p> <p>d) <i>Within 6 months of occupation, a Post-Construction certificate issued by the Building Research Establishment must be submitted to the local authority for approval, confirming this standard has been achieved.</i></p> <p><i>In the event that the development fails to achieve the agreed rating for the development, a full schedule and costings of remedial works required to achieve this rating shall be submitted for our written approval with 2 months of the submission of the post construction certificate. Thereafter the schedule of remedial works must be implemented on site within 3 months of the Local Authority’s approval of the schedule, or the full costs and management fees given to the Council for offsite remedial actions.</i></p> <p><i>Reason: In the interest of addressing climate change and securing sustainable development in accordance with London Plan (2021) Policies SI2, SI3 and SI4, and Local Plan (2017) Policies SP4 and DM21.</i></p> <p>Living roof and walls</p> <p><i>(a) Prior to the above ground commencement of development, details of the living roofs must be submitted to and approved in writing by the Local Planning Authority. Living roofs must be planted with flowering species that provide amenity and biodiversity value at different times of year. Plants must be grown and sourced from the UK and all soils and compost used must be peat-free, to reduce the impact on climate change. The submission shall include:</i></p> <ul style="list-style-type: none"> <i>i) A roof plan identifying where the living roofs will be located;</i> <i>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);</i> <i>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</i> 	

Stakeholder	Question/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 development, 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 has/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, SI1 and SI2 and Local Plan (2017) Policies SP4, SP5, SP11 and SP13.</p> <p>Biodiversity</p> <p>(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, urban greening, and 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</p>	

Stakeholder	Question/Comment	Response
	<p><i>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>Sustainable design and construction <i>Prior to the commencement of development, a Sustainable Design and Construction Strategy must be submitted to and approved by the Local Planning Authority to demonstrate that the development promotes a circular economy, reduces the whole life carbon of the development with sustainable construction and materials, reduces the environmental impact of the construction process and delivers biodiversity net gain and urban greening benefits.</i></p> <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>Urban Greening Factor <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>5. Planning Obligations Heads of Terms</p> <ul style="list-style-type: none"> - Be Seen commitment to uploading energy data - Energy Plan - Sustainability Review - Estimated carbon offset contribution (and associated obligations) of £36,480 (indicative), plus a 10% management fee; carbon offset contribution to be re-calculated at £2,850 per 	

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	tCO2 at the Energy Plan and Sustainability stages.	
Conservation	<p>The development site sits just outside the Clyde Circus Conservation Area boundary and forms part of the central area that is excluded from the Conservation Area designation due to its substantial alteration and markedly contemporary character.</p> <p>The proposed alterations and extension to the existing two storey commercial shed aim to achieve a seven-storey residential building with a set-back top floor and a commercial ground floor. The eastern edge of the development site borders the rear gardens of the two storey, late Victorian houses fronting Collingwood Road and included in the Clyde Circus Conservation Area. Quite sensitively, the proposed scheme retains that part of the existing two storey warehouse located to the rear of the development site and adjoining the rear gardens of the original houses along Collingwood road in Conservation Area and proposes a readaptation of the former warehouse for workspace and commercial units.</p> <p>The built context along Lawrence road is much more varied and contemporary: the development site is flanked to the south by six to seven storeys contemporary buildings with commercial plinth; to the north of the development site property at No 28 is a four storey plus one storey roof extension building, one of the earliest on Lawrence Road.</p> <p>The residential scale and consistent two storey townscape of the Conservation Area within its boundary are intact and fully legible in those views across the conservation area as seen from within the protected area and the application demonstrates through two key views across the Conservation Area how the proposed development will have a neutral impact in views of the area. The proposed view from Nelson Road shows that the proposed development would appear in the background of the original houses fronting Nelson Road, but it will seamlessly sit alongside the existing buildings of similar height and it is worth stressing how those taller buildings located just outside the conservation area boundary, and fronting Lawrence road such as property at no 28 Lawrence Road, already form the established visual setting of the conservation area, both as experienced along Nelson Road and as seen in eastwards views from Clyde Road.</p> <p>Property at no 28 Lawrence Road is indeed apparent in those eastward views out of the</p>	Noted.

Stakeholder	Question/Comment	Response
	<p>conservation area as dynamically taken from Clyde road where it is neatly legible the architectural and townscape difference between the consistent residential frontage of the conservation area extending until Collingwood road, and the taller, largely modern developments located just outside the Conservation Area boundary, well set beyond the modern building of the Islamic Centre and fronting Lawrence road.</p> <p>The proposed development will very likely, yet minimally appear in the background of those westward views taken along Clyde Road just before the junction with Collingwood road and looking out of the conservation area. Glimpses of the new development will possibly sit behind the roofline of the original terrace located in conservation area on the south side of Clyde road with a neutral effect on the character, legibility, consistency, and significance of the conservation area that will only benefit from the architectural quality and urban enhancements deriving from the proposed scheme that has benefitted from extensive design advice from the design officer and Design Review panel. The proposed development has been sensitively designed to complement the scale and height the contemporary buildings within Lawrence Road, and this is the existing and emerging context immediately surrounding the conservation area where the proposed scheme belongs to and whose scale, design and character have informed the design of the proposed scheme so to seize the opportunity to improve and reinforce the architectural and urban quality of the setting of the conservation area whilst conserving its heritage significance.</p> <p>The proposed scheme will have a neutral impact on the character and appearance of the conservation area, will cause no harm to its significance and will have a positive effect on the quality of its immediate surrounding. Accordingly, the proposed scheme is supported from the conservation stance.</p>	
Waste	<p>Thank you for giving the waste team the opportunity to comment on this planning application for alterations and extension to the existing building and the development of residential and ground floor commercial units at 30-48 Lawrence Road, N15 4EG.</p> <p>Information about the waste and recycling provision for this development is in the Transport statement and the calculations used for the residential waste capacity is taken from BS 5906. This equates 8,400 litres waste generated per week in total which has been allocated as</p> <ul style="list-style-type: none"> • General Waste: 4 x 1,100L Eurobins • Dry Mixed Recycling: 4 x 1,100L Eurobins 	Noted. Condition added.

Stakeholder	Question/Comment	Response
	<ul style="list-style-type: none"> • Food Waste: 4 x 240L wheelie bins <p>However we would refer the applicant to our supplementary planning guidance for waste which is available on the Haringey website planning pages. Based on this guidance the container provision should be:</p> <ul style="list-style-type: none"> • General Waste: 9 x 1,100L Eurobins • Dry Mixed Recycling: 6 x 1,100L Eurobins • Food Waste: 4 x 140L wheelie bins <p>Please also note the following information from our guidance</p> <ul style="list-style-type: none"> • Communal collections, serving six or more dwellings, must use bulk waste bins, each of maximum size to meet total capacity needs, and be located no further than 10 metres from the nearest point where the collection vehicle can safely stop. • The route from waste storage points to collection point must be as straight as possible with no kerbs or steps. Gradients should be no greater than 1:20 and surfaces must be smooth, flat and of solid construction such as concrete. Dropped kerbs must be installed as necessary for bulk bins. • If access through security gates/doors is required, digital keypad locks are the preferred method. <p>Bin storage areas must also:</p> <ol style="list-style-type: none"> a) be large enough to fit as many containers as are necessary to facilitate once per week collection. b) if with ceilings, have roof heights sufficient to allow residents to freely stand up inside while fully opening/closing bin lids c) have internal layouts that allow all containers to be accessed by users. Any one container must be able to be safely and easily removed from/put back to its original location within the bin store without the need to move other waste containers. d) have all doors and pathways 200mm wider than any bins that are required to pass through or over them. e) have the necessary lighting to facilitate safe usage for residents and collection crews. f) be constructed for ease of cleaning e.g. non-porous and smooth walls/floors with suitable drainage. h) incorporate appropriate measures to prevent: <ol style="list-style-type: none"> i. any damage to parked vehicles and property during manoeuvring of bins within and to/from the collection vehicle, 	

Stakeholder	Question/Comment	Response
	<p>ii. any obstructions, including illegal parking, inhibiting collection operations iii. fire and anti-social behaviour.</p> <p>We do not have specific commercial waste guidance but commercial waste is a chargeable service which can either be provided by Haringey / Veolia or with a private waste collector. We would ask that whoever is employed, is a registered waste carrier, complying with the waste duty of care code of practice and can produce the relevant documentation if requested. Having a commercial arrangement would allow the business occupants flexibility so that they can increase/ decrease collections depending on the amount of waste generated. However we would advise against sizing of the bins store and number of bins based on minimum size/number and maximum collections. The store should be sufficient space to store waste for at least 4 days.</p>	
LBH Pollution	<p>Thank you for contacting the Carbon Management Team (Pollution) regarding the above application for the Alterations and extension to existing building (Class E) and erection of residential building (Class C3) including ground floor commercial (Class E), cycle and car parking, hard and soft landscaping, and all other associated works at 30-48 Lawrence Road, Tottenham, London, N15 4EG and I would like to comment as it relates to this service as follows.</p> <p>Having considered the relevant applicant submitted information including: Design and Access Statement prepared by Boehm Lynas, dated 16th May 2024; Energy and Sustainability Statement prepared by FHP ESS, dated 16th May 2024 and taken note of the proposal to use Air Source Heat Pumps and Solar Photovoltaic panels; Outline Construction Logistics Plan prepared by Caneparo Associates Ltd, dated May 2024 taking note of section 3 (Construction Programme and Methodology), 4 (Vehicular Routing and Site Access), 5 (Strategies to Reduce Construction Impacts), 6 (Estimated Vehicular Movements), 7 (Implementing, Monitoring and Updating); Air Quality Assessment with reference J10/14571A/10/1/F3 prepared by Air Quality Consultants, dated 15th May 2024 taking note of section 4 (Assessment Approach), 5 (Baseline Conditions), 6 (Construction Phase Impact Assessment), 7 (Operational Phase Impact Assessment), 8 (Air Quality Neutral), 9 (Mitigation), 11 (Conclusions); Preliminary Investigation Report with reference 20922/PIR Rev1.1 prepared by Soils Ltd, dated June 2023, taking note of section 4 (Environmental Records and Consultation), 5 (Data Collection Summary), 6 (Preliminary Conceptual Site Model), 7 (Recommendations), and Ground Gas Investigation with reference 20922/GGRA/Rev1.1 prepared by Soils Ltd., dated October 2023 taking note of</p>	<p>Noted. Conditions and informative added</p>

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	<p>sections 2 (Site Works), 3 (Exploratory Hole Details), 4 (Ground Model), 5 (Ground Gas Monitoring), 6 (Ground Risk Assessment), 7 (Conclusion), please be advised that we have no objection to the proposed development in respect to air quality and land contamination but the following planning conditions and informative are recommended should planning permission be granted.</p> <p>1. Land Contamination Before development commences other than for investigative work: a. Using the information already submitted in Preliminary Investigation Report with reference 20922/PIR Rev1.1 prepared by Soils Ltd., 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. b. The risk assessment and refined Conceptual Model shall be submitted, along with the site investigation report, to the Local Planning Authority which shall be submitted to, and approved in writing by, the Local Planning Authority prior to that remediation being carried out on site. c. Where remediation of contamination on the site is required, completion of the remediation detailed in the method statement shall be carried out and 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> <p>Reason: To ensure the development can be implemented and occupied with adequate regard for environmental and public safety.</p> <p>2. Unexpected Contamination If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until a remediation strategy detailing how this contamination will be dealt with has been submitted to and approved in writing by the Local Planning Authority. The remediation strategy shall be implemented as approved.</p> <p>Reasons: To ensure that the development is not put at unacceptable risk from, or adversely affected by, unacceptable levels water pollution from previously unidentified contamination sources at the development site in line with paragraph 109 of the National Planning Policy</p>	

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	<p>Framework.</p> <p>3. NRMM</p> <p>a. No works shall commence on the site until all plant and machinery to be used at the demolition and construction phases have been submitted to, and approved in writing by, the Local Planning Authority. Evidence is required to meet Stage IIIB of EU Directive 97/68/ EC for both NOx and PM. No works shall be carried out on site until all Non-Road Mobile Machinery (NRMM) and plant to be used on the site of net power between 37kW and 560 kW has been registered at http://nrmm.london/. Proof of registration must be submitted to the Local Planning Authority prior to the commencement of any works on site.</p> <p>b. An inventory of all NRMM must be kept on site during the course of the demolitions, site preparation and construction phases. All machinery should be regularly serviced and service logs kept on site for inspection. Records should be kept on site which details proof of emission limits for all equipment. This documentation should be made available to local authority officers as required until development completion.</p> <p>Reason: To protect local air quality and comply with Policy 7.14 of the London Plan and the GLA NRMM LEZ</p> <p>4. Construction Environmental Management Plans</p> <p>a. Development shall not commence until a Construction Environmental Management Plan (CEMP) has been submitted to and approved in writing by the local planning authority.</p> <p>The following applies to Part a above:</p> <p>a) The CEMP shall include a Construction Logistics Plan (CLP) and Air Quality and Dust Management Plan (AQDMP).</p> <p>b) The CEMP shall provide details of how construction works are to be undertaken respectively and shall include:</p> <p>i. A construction method statement which identifies the stages and details how works will be undertaken;</p> <p>ii. Details of working hours, which unless otherwise agreed with the Local Planning Authority shall be limited to 08.00 to 18.00 Monday to Friday and 08.00 to 13.00 on Saturdays;</p> <p>iii. Details of plant and machinery to be used during construction works;</p>	

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	<p>iv. Details of an Unexploded Ordnance Survey;</p> <p>v. Details of the waste management strategy;</p> <p>vi. Details of community engagement arrangements;</p> <p>vii. Details of any acoustic hoarding;</p> <p>viii. A temporary drainage strategy and performance specification to control surface water runoff and Pollution Prevention Plan (in accordance with Environment Agency guidance);</p> <p>ix. Details of external lighting; and,</p> <p>x. Details of any other standard environmental management and control measures to be implemented.</p> <p>c) The CLP will be in accordance with Transport for London's Construction Logistics Plan Guidance (July 2017) and shall provide details on:</p> <p>i. Monitoring and joint working arrangements, where appropriate;</p> <p>ii. Site access and car parking arrangements;</p> <p>iii. Delivery booking systems;</p> <p>iv. Agreed routes to/from the Plot;</p> <p>v. Timing of deliveries to and removals from the Plot (to avoid peak times, as agreed with Highways Authority, 07.00 to 9.00 and 16.00 to 18.00, where possible); and</p> <p>vi. Travel plans for staff/personnel involved in construction works to detail the measures to encourage sustainable travel to the Plot during the construction phase; and</p> <p>vii. Joint arrangements with neighbouring developers for staff parking, Lorry Parking and consolidation of facilities such as concrete batching.</p> <p>d) The AQDMP will be in accordance with the Greater London Authority SPG Dust and Emissions Control (2014) and shall include:</p> <p>i. Mitigation measures to manage and minimise construction dust emissions during works;</p> <p>ii. Details confirming the Plot has been registered at http://nrmm.london;</p> <p>iii. Evidence of Non-Road Mobile Machinery (NRMM) and plant registration shall be available on site in the event of Local Authority Inspection;</p> <p>iv. An inventory of NRMM currently on site (machinery should be regularly serviced, and service logs kept on site, which includes proof of emission limits for equipment for inspection);</p> <p>v. A Dust Risk Assessment for the works; and</p> <p>vi. Lorry Parking, in joint arrangement where appropriate.</p> <p>The development shall be carried out in accordance with the approved details. Additionally, the site or Contractor Company must be registered with the Considerate Constructors Scheme. Proof of registration must be sent to the Local Planning Authority prior to any works being</p>	

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	<p>carried out.</p> <p>Reason: To safeguard residential amenity, reduce congestion and mitigate obstruction to the flow of traffic, protect air quality and the amenity of the locality.”</p> <p>Informative:</p> <p>1. Prior to demolition 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.</p>	
<p>Flood and Water Management</p>	<p>Thank you for re-consulting us on the above planning application reference number HGY/2024/1456 for the alterations and extension to existing building (Class E) and erection of residential building (Class C3) including ground floor commercial (Class E), cycle and car parking, hard and soft landscaping, and all other associated works at 30-48 Lawrence Road, Tottenham, London, N15 4EG</p> <p>Having reviewed the applicant’s recently submitted Flood Risk Assessment and Drainage Strategy report reference number BWM Report: 5899-BWM-XX-XX-RP-C-0010-ISSUE 3 dated 27th August 2024 as prepared by BWM structural and civil consulting engineers and their Thames Water pre-planning enquiry letter confirming the sufficient capacity within their sewers, we are generally content with the strategy and methodology as used within the above report, subject to implementation of the following planning conditions regarding the Surface water Drainage Strategy and it’s management and maintenance plan.</p> <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>	<p>Noted. Conditions added.</p>

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	<p>b) 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</p> <p>c)</p> <p>d) so include an allowance for climate change.</p> <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> <p>Carbon Management Response 21/03/2025</p> <p>In preparing this consultation response, we have reviewed:</p> <ul style="list-style-type: none"> • Revised drawings prepared by boehm lynas (dated 6 Jan 2025) • Relevant supporting documents. <p>1. Summary</p> <p>The applicant has revised the proposal with changes in the commercial element of the development. The revised roof area has decreased which initially accommodated 120 panels of 400w each with total peak output of 48kWp. With the proposed changes, there is a direct impact on the number of solar panels that</p>	

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	<p>the roof can accommodate and the associated carbon reduction figures. A revised energy strategy is required to understand the carbon impacts of these changes. This has been conditioned.</p> <p>The energy condition has been amended as follows:</p> <p>Energy strategy <i>The development hereby approved shall be constructed in accordance with the Energy & Sustainability Statement Revision D prepared by FHP ESS (dated 28 Aug 2024) delivering a minimum 82% improvement on carbon emissions over 2021 Building Regulations Part L (indicative subject to remodelling the latest design changes of January 2025), with high fabric efficiencies, COMMUNAL air source heat pumps (ASHPs) and aiming for 48 kWp solar photovoltaic (PV) array.</i></p> <p><i>(a) Prior to above ground construction, a revised Energy Strategy shall be submitted to and approved by the Local Planning Authority. This must include:</i></p> <ul style="list-style-type: none"> - <i>Confirmation of how this development will meet the zero-carbon policy requirement in line with the Energy Hierarchy;</i> - <i>Confirmation of the necessary fabric efficiencies to achieve a minimum 14% reduction;</i> - <i>Details to reduce thermal bridging;</i> - <i>Location, specification and efficiency of the proposed ASHPs (Coefficient of Performance, Seasonal Coefficient of Performance, and the Seasonal Performance Factor), with plans showing the ASHP pipework and noise and visual mitigation measures;</i> - <i>Specification and efficiency of the proposed Mechanical Ventilation and Heat Recovery (MVHR), with plans showing the rigid MVHR ducting and location of the unit;</i> - <i>Details of the PV, demonstrating the roof area has been maximised on both residential and non-residential blocks, 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); inverter capacity; and how the energy will be used on-site before exporting to the grid;</i> - <i>Specification of any additional equipment installed to reduce carbon emissions, if relevant;</i> - <i>A metering strategy</i> <p><i>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.</i></p> <p><i>(b) The solar PV arrays and air source heat pumps must be installed and brought into use prior to first</i></p>	

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	<p><i>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.</i></p> <p><i>(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.</i></p> <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>	
LBH Arboriculture	<p>These Plane trees are surrounded by static environment making rooting viability hard to determine.</p> <p>However, the comments below are acceptable as mitigating solutions and I concur with the proposed actions.</p> <p>Incursion into the root protection areas is minimal and favourable conditions can be created.</p> <p>There is an existing crossover, until the explorative excavation to determine roots is carried out, we can only assume that this area has been strengthened in the past for vehicular access.</p> <p>Every part of the tree survey and method statement will need to be conditioned including the lining of any future foundation trenches.</p>	Noted. Conditions added.
LBH Design	<p><u>HGY/2024/1456</u></p> <p>30-48 Lawrence Road Tottenham London N15 4EG</p> <p><i>Alterations and extension to existing building (Class E) and erection of residential building (Class C3) including ground floor commercial (Class E), cycle and car parking, hard and soft landscaping, and all other associated works.</i></p> <p>Applicant: CNF London Properties Limited</p>	Noted.

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	<p>Agent: DP9 Limited</p> <p>Architects: Boehm-Lynas</p> <p><u>Contents</u></p> <p>Summary 96</p> <p>Context, & Structure of the Application..... 96</p> <p>Masterplan 100</p> <p>Height, Form, Bulk, Massing & Layout 100</p> <p>Elevational Composition, Fenestration and Materiality 102</p> <p>Residential Quality (Flat Layouts and Amenity Space) 104</p> <p>Impact on Amenity (Privacy, Daylight and Sunlight) 105</p> <p>Requested Conditions and Informatives..... 107</p> <p>Summary</p> <p>These proposals represent the final piece in a jigsaw of masterplanned transformation of the bulk of Lawrence Road from a struggling industrial area that attracted anti-social behaviour into a thriving higher density residentially led neighbourhood of dignified “mansion blocks”, of a consistent, elegant design with common features including regular rhythm, gradation into two storey base, three or four storey middle and recessed top floors, with employment integrated and with the existing tree lined street enhanced. This proposal largely follows the established pattern in its Lawrence Road frontage, whilst introducing its own distinctiveness, and creates what promise to be high quality new homes. It also introduces as significant amount of employment in the innovative form of reusing the rear part of the existing industrial building, to benefits of sustainability and economic development. There are a few details that will need to be conditioned, but generally the design is of a high quality and appropriate for the location and context.</p> <p>Context, & Structure of the Application</p> <p>1. The site is on the east side of Lawrence Road, just north of mid-way along its length. Lawrence Road is towards the south-east of Haringey, but not close to the borough’s boundaries. It is in the wider Tottenham area, but west of the High Road that forms its spine, and crucially west of the Liverpool Street to Enfield Town and Cheshunt Overground Railway, that for many marks the western boundary of the heart of Tottenham; it can therefore be seen as being on the eastern,</p>	

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	<p>Tottenham side of the mostly residential hinterland area of Haringey between the eastern (Tottenham High Road) and central (Green Lanes / Wood Green High Road) “spines” of the borough.</p> <p>2. Lawrence Road is just north-west of the western end of the busy shopping street and designated Town Centre of West Green Road. There are also local shops and amenities on Phillip Lane, to the north. Both streets also form primary east-west connections and bus routes between Tottenham High Road and Green Lanes, merging at West Green, half way between the two. Lawrence Road therefore sits within an elongated, triangular urban block formed by West Green Road, Philip Lane and the High Road, 1km east to west and ½ km north-south, the approximate length of Lawrence Road itself.</p> <p>3. The street forms a grand avenue, running north-south, connecting West Green Road with Philip Lane; it is the main street linking the two, and its junction with West Green Road forms the point where that latter street changes abruptly from a busy, vibrant and “tightly proportioned” shopping street into a broad, residential arterial road. Philip Lane has less consistency of character, alternating between short retail parades and residential terraces and rows of detached and semi-detached villas, varying from late 18th to early 20th century.</p> <p>4. Lawrence Road is lined with majestic mature trees. Until recently Lawrence Road itself was characterised by consistent terraces of 4 and 5 storey mid-20th century industrial buildings over its southern 2/3, with one a large late 19th / early 20th century industrial building of six high storeys, no. 28, marking the end of the “industrial street”. North of this is a street/linear park crossing; for the last third of the street is residential in character, starting with a pair of 1960s 6-storey blocks then dropping down to 2-storey up to Philip Lane. Grand 19th century public houses mark each end of Lawrence Road; The Fountain at the southern end and the former Botany Bay (now a supermarket) at the northern end.</p> <p>5. The Council have considered the whole industrial stretch (southern 2/3) of Lawrence Road as suitable for residential lead mixed use redevelopment for over 17 years and first adopted this view in the 2007 Lawrence Road Planning Brief (adopted as Supplementary Planning Guidance). The sites falls within the allocated site SS2 in the adopted Tottenham Area Action Plan (July 2017), which is simply for: <i>“Mixed use development with commercial uses at ground floor level and residential above.”</i></p> <p>6. The pertinent Site Requirements for the Site Allocation are:</p> <ul style="list-style-type: none"> • Development proposals will be required to be accompanied by a site-wide masterplan showing how the land included meets this policy and does not compromise coordinated 	

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	<p>development on the other land parcels within the allocation.</p> <ul style="list-style-type: none"> • Re-provision of employment floorspace at ground floor level along Lawrence Road, with residential development above. • This site is suitable for taller buildings facing both sides of Lawrence Road with newtype <i>[sic]</i> streets behind containing family housing. Proposals responding to the scale of the terraced housing prevailing in the Clyde Circus Conservation Area to the east and west will be supported, in line with the extant planning permission on the southern section of the site.¹ <p>And the relevant Development Guidelines are:</p> <ul style="list-style-type: none"> • Existing good quality stock, notably 28 Lawrence Road, which can continue to meet the needs of contemporary commercial uses, should be preserved as part of a more comprehensive development. • The existing street trees are a strong asset to the streetscape and should be preserved. • Approaches to ensuring the retention of the commercial use remains affordable in perpetuity will be supported in line with Policy DM38. • While taller development is suitable on the Lawrence Road frontage due to the deep set backs from the street, consideration should be given to avoid new development creating a canyon-like effect on this street.² <p>7. The form of redevelopment envisaged by the council over the whole of Lawrence Road is of mixed employment and residential with a consistent form of blocks facing the street with non-residential use on their lowest floors and active frontage, plus possible residential behind; the retention no. 28 and its established heights form an important governing principle for the masterplan of Lawrence Road. However, it was not considered a necessity that all the industrial sites were redeveloped or all developed in exactly this way. Proposals, including this, are therefore expected to accommodate both the existing context and possible future residential led redevelopment, in accordance with previous masterplans, on their neighbours.</p> <p>8. The first and largest site to be redeveloped in accordance with the masterplan was the Bellway site,</p>	

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	<p>known to the developers as “Lawrence Square”, designed by BPTW Architects, approved in 2013 as HGY/2012/1983. This is separated from the current application site by its immediate neighbour and the most recently completed development, nos. 50-56 to the south, application no. HGY/2016/2824. West of this site, on the other side of Lawrence Road, is no. 69, which was converted and extended under permitted development and applications numbered HGY/2017/0357 & HGY/2017/1821. This is followed directly opposite by no. 67 and nos. 45-63, two adjoining, intertwined sites for which complimentary planning applications (HGY/2016/1213 & HGY/2016/1212) to designs by Forge Architects and Kieran Curtis Architects, which are both currently nearing completion of their construction.</p> <p>9. North of 45-63, a linear park, improved by section 106 contributions from most of the above-mentioned developments, provides local amenity and play provisions including equipped playgrounds for 5-11 year olds and a basket ball court for 11-16 year olds, that continues the east west alignment of Clyde Road, that now turns off Lawrence Road east, just north of the site, into Clyde Circus, the ornamental heart of the neighbouring Conservation Area. Between this application site and Clyde Road, is no. 28, the one retained older building on Lawrence Road, an ornamental, late-Victorian baroque building converted into a mixture of small business units. It has two narrow yards running off Lawrence Road through an archway on its north and south side, with a smaller two storey building, facing the street with a projecting shopfront, beyond each and therefore forming the most immediate neighbour to this proposal</p> <p>10. Currently the application site, nos. 30-48 is the factory for the “Jeeves of Belgravia” dry cleaning business. This has a large car park at the front onto Lawrence Road, with a 2-storey red brick office building and a large, effectively 3 storey portal framed factory building behind filling their site. Along their southern boundary, there is a single storey lean-to (as well as a number of vent outlets in the main factory block above this lean-to). The Lawrence Road frontage of their site extends slightly past the front of no. 50-56, meaning the Lawrence Road frontage of this application site is slightly wider than its rear ¾. Jeeves of Belgravia have a large single storey plant installation, adorned with flues and vents, in this projection.</p> <p>11. Parallel to Lawrence Road to its east and west is series of quieter residential streets with a mixture of older houses, parts of the Clyde Circus Conservation Area; their back gardens back onto the eastern boundary of this site. The Bellway development backs onto long back gardens of houses on Grove Park Road, which ends in a short cul-de-sac level with the south-eastern corner of 50-56. This site, nos. 28 to its north and 50-56 to its south back onto much shorter back gardens of houses in Collingwood Road, also parallel to Lawrence Road but closer than Grove Park Road. It too terminates in a short cul-de-sac, with Nelson Road running north-east off it just before the cul-de-sac; this street will provide a view of taller buildings on the application site over the rooftops of the 2</p>	

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	<p>storey terrace of Collingwood Road.</p> <p>Masterplan</p> <p>12. The proposals are to retain about half of the existing large single storey portal framed main Jeeves building, which will be converted for use as several, flexible, smaller business units, with a new building “filling in” the frontage with a residential building. This solution arose out of extensive discussions between the applicants, officers and in three Quality Review Panel (QRP) reviews, members of the QRP, where it was agreed that in view of the relatively recent date of construction and good existing condition of the Jeeves factory building, it would be sensible to vary the Lawrence Road-wide masterplan followed on other sites for this site, and retain most of that existing building.</p> <p>13. Therefore the Lawrence Road masterplan “model” is modified for this development, with the rear of the site to be in employment use in the retained existing building, rather than replaced with a mews-type street and mews-type housing. There will still be a taller building fronting Lawrence Road, and overall a very similar height and bulk profile in this proposal to all the other sites that have previously been developed. Retention of most of the existing factory also recognises that the applicants themselves and their architects are particularly interested and expert in modern workspace, and would wish to provide more workspace as a proportion of the development as has been done in the rest of the new developments in Lawrence Road.</p> <p>14. This development is also for the whole of their site and is the last site expected to be developed in the Lawrence Road Site location, so the site allocation requirement for a masterplan is fulfilled in whole by their detailed proposals for the whole of their site and their demonstrations, convincingly made, that their proposals are well coordinated with their completed or under-construction neighbours. Therefore, there is no need for any separate masterplan in this application.</p> <p>Height, Form, Bulk, Massing & Layout</p> <p>15. The taller proposed new frontage building, and the retained part of the rear existing industrial building, will form one building mass, connected by a new linking single storey “podium” structure. Given the unique strategy (for Lawrence Road) in this development, this is considered to conform well to the overall strategy employed throughout Lawrence Road, of locating the greater height and activity to the street frontage.</p> <p>16. The proposed frontage building will rise to seven stories, with the top floor set back from the front and the northern part of the rear by about 2m, and from the northern side by about 6m. In form, the northern 1/3 of the frontage projects forward, and is expressed as a lower, six-storey element that matches the bulk and height of the neighbouring main building of no. 28, whilst the seven-storey remainder, in form overlapping “behind” the six-storey element, is almost the same height as the</p>	

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	<p>neighbouring nos. 50-56 to the south. It is slightly taller than 50-56, having a higher parapet, and a less obviously recessed top floor, but this reasonably reflects the rising land along the street and the gradual increase in height that 50-56 also exhibits over its neighbour to its south. The proposal also matches the height, bulk, form and massing of 67 and 42- 65 Lawrence Road, the properties directly opposite and to its north on the west side of the street, with no. 69 to the south being slightly lower in height.</p> <p>17. The existing factory, the rear part of which is retained, is a portal (pitched) roof form aligned east-west, its eaves and retained eastern gable extending within one metre of the northern, eastern and southern boundaries of the site. As existing, it is a single open volume, but equivalent to just under two storeys of the proposed frontage building at the eaves and just over two storeys at the ridge. This is the existing boundary condition for the neighbouring houses on Collingwood Road to the immediate east of this application site.</p> <p>18. The applicants propose to raise most of the central part of the roof by about 2 further metres, following the same pitch, to provide additional floorspace and head height within the flexible workspace they plan for the retained building, but this will be pulled in from each side. This will mean there should be no apparent change in height when seen from within the neighbouring houses on Collingwood Road, and the increase should be small and well set back from the studios in no. 28. The five-storey immediately neighbouring block to the south, part of the development of 50-56, turns its back on this application site so that the minor changes proposed from their respect should not be perceived. This proposal to modestly raise the central part of roof is therefore considered wholly acceptable in design.</p> <p>19. There is a small gap between the five and eight storey blocks of the neighbouring development at 50-56, from which a small part of the rear of the frontage block and the side of the podium will “peep” into the courtyard/mews space at the heart of 50-56. The proposed frontage building is designed to align with and act as a continuation of 50-56’s frontage building.</p> <p>20. At the northern boundary, the lower six-storey proposed frontage is shallower than the seven-storey, creating a step so that it corresponds to the depth of the adjoining two storey block form no. 28; behind this step the propped development opens out into a large outdoor courtyard, that provide entrance, servicing and parking for the commercial units, as well as having areas of soft landscaping and 6no. proposed new trees, with the second residential core also opening off the archway. This has the potential to be a charming feature that can be glimpsed from the street, and should form an entirely acceptable entrance to the workspace and some of the residential. The Quality Review Panel expressed concerns about this being an entrance to some of the residential, but in the completed design, with thoughtful landscaping, and provided it is well maintained, this is considered to be an entirely acceptable transitional space to the residents’ and workspaces’ front</p>	

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	<p>door.</p> <p>21. As this proposal is of similar height to its surroundings, only a small number of views of the development in context were considered to be required, with similar views being assessed as was required for the neighbouring Vabel development (nos. 50-56 Lawrence Road). Therefore two sketch views of the street frontage, from up and down Lawrence Road, and two views of its potential impact from the residential streets behind, to the east, that are also in the Clyde Circus Conservation Area, are included. The two views from Lawrence Road convincingly show this proposal fits in well with the height, form and pattern of development established for Lawrence Road, filling the last remaining gap.</p> <p>22. The view from Collingwood Road, the quiet residential street immediately to the east of the site, shows that it would not be visible over the rooftops of these modest two storey houses, due to the narrow width of this street and the considerable distance from these houses to the taller, street-fronting building in the development. The view from the far end of Nelson Road which ends in a T-junction with Collingwood and therefore can be expected to give a longer, less obstructed view of the development, reveals the top floors of the proposal poking above the rooftops of the two-storey, terraced houses on Collingwood, but clearly distant from those houses and not so as to appear oppressively taller, and much further back and therefore less dominant than views of 50-56 (Vabel) from this place.</p> <p>23. Overall, the proposed height, form, bulk, massing and layout conforms well to the established masterplan, acts as a highly compatible neighbour to adjoining sites and fills in the last remaining gap such that on its completion, the transformed main stretch of Lawrence Road should exhibit a consistency, as a grand, tree-lined avenue, lined with contemporary (& one historic), elegant, mansion blocks.</p> <p>Elevational Composition, Fenestration and Materiality</p> <p>24. The main elevational composition consideration is with the Lawrence Road street frontage, as is to be expected from such a frontage-oriented development. Whilst the rear of the frontage block is glimpsable, especially from the courtyard/mews space to the southeast of the site ("Bathurst Square"), within the podium of the development and from courtyard space within no. 28, the main drivers in the composition of the rear are its impact on residential quality.</p> <p>25. The proposed frontage to Lawrence Road closely follows the established elevational composition pattern; vertically of a two-storey base, three to four storey middle and one to two storey top; horizontally of a rhythm of regular width bays. The base is formed by both the ground floor commercial and ancillary residential accommodation and the first floor of flats, united by floor to ceiling glazing or metal doors and panels across the full width of the bays, with the 1st floor</p>	

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	<p>separated from the ground by deep projecting balconies at the full width between brick piers, very similar to both 50-56 and 67, with the brick piers to the forward projecting left portion being further enlivened with a projecting rib pater, reflecting the more decorative character of no. 28, the whole base acting architecturally as an arcade.</p> <p>26. Over the middle floors, the rhythm established by the base of piers is continues as two windows per bay. The windows are of strongly vertical proportions and on a strict regular pattern. Balconies project forward along much but not all of the elevation, with their balustrade spacing apparently reducing further up the building, and the windows to the 5th floor get a projecting frame, with a projecting stone horizontal course above and below those on the projecting element, in a further reflection of the more decorative composition of no. 28. To the top floor, the whole elevation is recessed behind a further projection in brick piers and parapet of the arcade from the base and providing shading to both balconies and windows to this floor that could otherwise be most exposed to solar gain, whilst reading as am architecturally strong, framing crown, recognising this development's status as the final crowning moment and (only just) the highest point in the transformed Lawrence Road, in what represents a very well thought out and pleasingly composed elevation.</p> <p>27. Notwithstanding its less visible status, and it's need to juggle with functional requirements, the rear is also well composed. External access decks link the two cores and provide access to dual aspect deck access flats in the centre of the plan, creating a strong horizontality, but to either side the elevational composition is of stacked regularly spaced windows of the same vertical proportions to those on the front elevation. The set-back section at the northern end, corresponding to the one floor lower, forward projecting element on the street frontage and continue its recessed brick and projecting band detailing. However, it should be noted that all windows on both elevations are shown as a single, plain sheet of glass, without any mullions, transoms, opening leaves, ventilation or accommodation of requirements to make them safe from falling; should any changes be required to the proposed design to achieve these requirements, which seems likely, there is a danger that the current elegant composition could be lost, and it is therefore suggested that a specific condition be included noting the need to maintain a consideration of the overall elevational composition, should any such changes be required.</p> <p>28. The proposed material palette is brick based, with their stated design intention in the Design & Access Statement being <i>"an orange / red brick ..., similar to the Vabel building to the south, which allows No.28 to remain individual in the street with a more yellow stock brick"</i>, with the coloured images showing a brick in a red range with considerable variation. Whilst the actual brick to be used would need to be confirmed in a condition, this intent is welcomed as appropriate and likely to be an attractive brick.</p>	

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	<p>29. There are also extensive amounts of metalwork, including to doors, window frames, balcony facias, balustrades and handrails; these are described as dark grey and shown as almost a black. Whilst this is also similar to the neighbouring Vabel building, the greater width of this proposal onto Lawrence Road, and greater horizontality of the rear, officers and the QRP have noted could lead to such a dark and consistent colour being over repetitive and rather gloomy; the QRP made a good suggestion that some subtle, lighter colour variation could be introduced, especially to the rear. As the QRP noted, a condition on metalwork colours and colour scheme should be included, with an informative noting this desire.</p> <p>Residential Quality (Flat Layouts and Amenity Space)</p> <p>30. 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>31. There are single aspect flats within the scheme; two on the 1st floor, three on each of the 2nd, 3rd, 4th & 5th floors, fourteen in total out of 56 (25%). All are all west facing, mostly 1 bedroom (one of two bedrooms on the 2nd, 3rd, 4th & 5th floors) and none of them are at ground level, so this is considered a very good, high number of dual aspect homes, for what is a higher density, urban location. What is more, all flats will have a more generous than normal high floor to ceiling height (2.65m), and as west facing flats will be able to use east and north facing communal external amenity space. Most will also have good sun shading to most of their west facing windows from projecting balconies above, but two single aspect flats on the 5th floor (as well as several other windows, in dual aspect on this floor) will not, although they apparently have projecting frames, which may provide sufficient protection from solar gain leading to overheating.</p> <p>32. There will be two stair and lift cores, accessed from separate street entrances, but they will connect together at each floor via the 1st floor podium or connecting decks on floors above. With just 10 affordable (shared ownership) flats, there will not be a separate core or entrance exclusively for those, so there will be no danger of perception of there being a “poor door”. Although there are proposed to be up to ten flats per floor, more than the recommended maximum of eight, given that these are split across two cores and many are accessed from external podiums and access decks overlooked by their own and neighbouring habitable room windows, any concern at anonymity of the development for residents should be avoided.</p> <p>33. Every flat will also have access to all three communal outdoor amenity spaces. Of these, the 1st floor podium will include children’s play facilities for doorstep play for younger children, with play</p>	

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	<p>facilities for older children being available in public facilities in Elisabeth Place, 100m from the development. The promises and aspirations in the Design & Access Statement for landscaping to all three roof terraces is very promising, though it has to be noted that the climbing plants to create a green wall onto the courtyard, from the the new west wall to the retained workspace, is not shown on plans or elevations, so its delivery should be specifically confirmed in the relevant condition. The quantum of playspace and private communal amenity space is considered good, as is the variety pf spaces offered, suited to different characters (child friendly, quiet, with expansive views etc), and adjoining flats are well buffered from the noisier parts of the amenity and paly space with defensive planting and their own areas of private roof terrace.</p> <p>Impact on Amenity (Privacy, Daylight and Sunlight)</p> <p>34. The applicants provided Daylight and Sunlight Reports on levels within their development and the effect of their proposals on relevant neighbouring buildings, prepared 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> <p>35. In the case of higher density developments, it should 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. In particular, the 27% Vertical Sky Component (VSC) recommended guideline is based on a low density suburban housing model and in an urban environment it is recognised that VSC values in excess of 20% are considered as reasonably good, and that VSC values in the mid-teens are deemed acceptable. Paragraph 2.3.29 of the GLA Housing SPD supports this view as it acknowledges that natural light can be restricted in densely developed parts of the city. Therefore, full or near full compliance with the BRE Guide is not to be expected.</p> <p>36. Nevertheless, their assessment finds the proposals achieve good levels of daylight and sunlight to most floors, with 63% of rooms will satisfy the BRE guidelines and further 9% will remain within 20% of recommended level. For sunlight, 77% of apartments will satisfy the BRE guidelines, and to external amenity space, the overall area passes easily, with the 1st floor podium falling just short (49%, where 50% is considered the requirement), and the other two spaces getting much larger amounts of sunlight. This is considered a very good level of daylight and sunlight for a relatively high density development in an urban area.</p> <p>37. For impact of the proposals on existing and previously permitted neighbours (including the flats nearing completion in the developments at 45-63 & 67 Lawrence Road, opposite), the daylight test indicates that 83% of the neighbouring windows and 85% of the neighbouring rooms tested satisfy the BRE guidelines, with all the rooms that fall below the BRE Guide recommendations being in</p>	

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	<p>wither no. 28 immediately north of the site or no. 67 opposite. This would not be an unacceptable result on its own, but when it is considered that the current state of the application site, with a large surface car park fronting a low rise industrial building, should be considered significant under-development of the site. When the daylight tests for the affected properties are re-run compared to a “mirror” of their own building on the application site, as the BRE Guide recommends in these circumstances, all the previously affected rooms are shown to be unaffected.</p> <p>38. The sunlight test indicates that all neighbouring properties satisfy the BRE guidelines, whilst the overshadowing test indicates that all neighbouring gardens will satisfy the BRE guidelines. Overall, these assessments show the proposals have very little if any detrimental affect on neighbours amenity and reasonable levels within the proposed development, a very good result for a relatively high density development in an urban location, considering that the BRE Guide is written primarily with suburban locations in mind.</p> <p>39. The proposals do not create any potential overlooking concerns, nor are overlooked, such as to raise concerns for privacy, except in the rear corners where flats could have a flanking view of the neighbouring properties at no. 28 (to the north) or no. 50-56 (to the south). There would not normally be any expectation of privacy from street facing windows anyway, before it is considered that the street, Lawrence Road, with its mature trees and the considerable ser-backs of these proposed and other existing buildings, creates a building-to-building distance of over 20m, in fact approaching 30m, when the maximum distance considered to raise any privacy concern is 18m.</p> <p>40. The layout of no. 28 to the north of the site means that most windows face south, onto either the blank flank of this development (which will be just over 10mm away), the 1st floor podium garden or the roof of the existing portal framed shed. Some windows will face secondary living room windows of the projecting rear 3-bedroom flat, at about 19m distance, which is just about acceptable, whilst the 45° distance to bedroom windows in the rear of the northern most 2-bed flat will also be about 18m away.</p> <p>41. The relationship between the southern end of the development and 50-56 is more complicated; its street-front block is parallel and will have no overlooking, its mews properties are much further away, and that development’s “intermediate” 5-storey block has a blank flank wall facing the two bedroom windows in the southernmost flat of this application scheme, but these projecting oriel type windows will be close to the side of those flats’ projecting south facing balconies, and only separated by about 5m. However, the side of these projecting balconies is not their primary outlook, and given the existing condition is industrial plant close to them, they have been designed with louvres screening to this side to prevent an outlook, which should also prevent overlooking.</p> <p>42. Within the development, the proposals are designed to avoid any overlooking. The main concern</p>	

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	<p>was the podium and deck access to the middle part of the east elevation, and the access decks and route have been separated off the building line by about 4m to give a reasonable separation, on the 1st floor via private roof terraces. Extensive reliance on balconies for private amenity space, including balconies facing the street, where privacy of balconies, and unsightly visibility of clutter on balconies could be a problem, should be mitigated by the applicants' stated intention that balcony balusters will be closely spaced on lower floors, becoming gradually more widely spaced as the building height increases, but this is not shown clearly on the application drawings so should be confirmed in a condition. Balconies to 1st floor flats are especially deep to provide a strong separation to the street, minimise disturbance to residential use from the street and from the service and car park access to the development from the street.</p> <p>43. Overall, these proposals benefit from being the final jigsaw piece in a well designed and successful masterplanned transformation of the Lawrence Road area into a modern mansion block neighbourhood of popular new homes that provide housing to high standards, successfully avoiding detrimental amenity impacts.</p> <p>Requested Conditions and Informatives</p> <p>44. Notwithstanding the overall design quality of this proposal, a small number of conditions and/or informatives are requested, to safeguard design quality, make up for shortcomings in the application documents and allow the full potential of the site and its neighbours to contribute to the Council's Placemaking Objectives:</p> <ul style="list-style-type: none"> • Materials, including proposed brick, copings, facias, soffits, gates, door and window frames. • Colours and colour scheme for metalwork; including an informative referencing the comments in para. 29. • Details, including: window cills, jambs and heads; parapets and copings; balcony balustrade, facia and soffits (recessed and projecting); doors and gates from the street. Balcony balustrade details to include gradation of spacing of balusters from close spaced on the 1st floor to more widely spaced progressively with each additional floor, with the intention of providing residents' privacy on their balconies from the street and hiding clutter on balconies in views from the street. • Detailed window design, incorporating openings, ventilation, fall prevention requirements, to be designed and coordinated to maintain an elegant overall elevational appearance with the designed proportions. 	

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	<ul style="list-style-type: none"> That security grills and shutters to “shopfront” style windows, at ground level onto the street, are only to be of the open type and fitted internally to the window. <p>Landscaping to be delivered to the quality promised, including the street frontage, courtyard between the frontage and rear of the proposal, and the three podium or rooftop private communal amenity spaces, and including the green wall to the west gable wall to the retained workspace building, facing onto the 1st floor roof terrace, and to be detailed in drawings submitted for condition (otherwise in accordance with standard landscaping conditions). It should also be noted that the landscaping to the south-western corner of the street frontage should, if possible, enable maximum permeability along the street, without the fence shown on the frontage between the application site and no. 50-56 (Vabel Lawrence).</p>	
EXTERNAL		
Thames Water	<p>Waste Comments</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 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>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</p>	Noted. Informatives attached.

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	<p>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>We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, testing and site remediation. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. Should the Local Planning Authority be minded to approve the planning application, Thames Water would like the following informative attached to the planning permission: "A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 020 3577 9483 or by emailing trade.effluent@thameswater.co.uk . Application forms should be completed on line via www.thameswater.co.uk. Please refer to the Wholesale; Business customers; Groundwater discharges section.</p> <p>With regard to SURFACE WATER drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water we would have no objection. Management of surface water from new developments should follow Policy SI 13 Sustainable drainage of the London Plan 2021. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. Should you require further information please refer to our website. https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes</p> <p>Thames Water would advise that with regard to WASTE WATER NETWORK and SEWAGE TREATMENT WORKS infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.</p> <p>Thames Water would recommend that petrol / oil interceptors be fitted in all car parking/washing/repair facilities. Failure to enforce the effective use of petrol / oil interceptors</p>	

Stakeholder	Question/Comment	Response
	<p>could result in oil-polluted discharges entering local watercourses.</p> <p>Water Comments There are water mains crossing or close to your development. Thames Water do NOT permit the building over or construction within 3m of water mains. If you're planning significant works near our mains (within 3m) we'll need to check that your development doesn't reduce capacity, limit repair or maintenance activities during and after construction, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes</p> <p>If you are planning on using mains water for construction purposes, it's important you let Thames Water know before you start using it, to avoid potential fines for improper usage. More information and how to apply can be found online at thameswater.co.uk/buildingwater.</p> <p>On the basis of information provided, Thames Water would advise that with regard to water network and water treatment infrastructure capacity, we would not have any objection to the above planning application. Thames Water recommends 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>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>On the basis of information provided, Thames Water would advise that with regard to water network infrastructure capacity, we would not have any objection to the above planning application. Thames Water recommend the following informative be attached to this planning permission. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters</p>	

Stakeholder	Question/Comment	Response
	<p>pipes. The developer should take account of this minimum pressure in the design of the proposed development.</p> <p>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>The applicant is advised that their development boundary falls within a Source Protection Zone for groundwater abstraction. These zones may be at particular risk from polluting activities on or below the land surface. To prevent pollution, the Environment Agency and Thames Water (or other local water undertaker) will use a tiered, risk-based approach to regulate activities that may impact groundwater resources. The applicant is encouraged to read the Environment Agency's approach to groundwater protection (available at https://www.gov.uk/government/publications/groundwater-protection-position-statements) and may wish to discuss the implication for their development with a suitably qualified environmental consultant.</p>	
Metropolitan Police Designing Out Crime	<p>Thank you for allowing us to comment on the above planning proposal.</p> <p>With reference to the above application we have had an opportunity to examine the details submitted and would like to offer the following comments, observations and recommendations. These are based on relevant information to this site (Please see Appendices), including my knowledge and experience as a Designing Out Crime Officer and as a Police Officer.</p> <p>It is in our professional opinion that crime prevention and community safety are material considerations because of the mixed use, complex design, layout and the sensitive location of the development. To ensure the delivery of a safer development in line with L.B. Haringey DMM4 and DMM5 (See Appendix), we have highlighted some of the main comments we have</p>	Noted, Conditions attached.

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	<p>in relation to Crime Prevention (Appendices 1).</p> <p>We have not met with the original project Architects but it has been demonstrated within the Design and Access statement that they intend to follow Secured by Design Guidelines. We request that the developer contacts us at the earliest convenience to ensure that the development is designed to reduce crime at an early stage.</p> <p>Metropolitan Police Service Designing out Crime Group do not provide a consultation service solely for the purposes of meeting the BREEAM Security Needs Assessment. However, the Metropolitan Police Service Designing out Crime Group can assist the developer to achieve the relevant BREEAM credit for Safety and Security via an application for Secured by Design accreditation (SBD). A signed and dated SBD Commercial application form should be emailed to the above email address. Please note full submissions should be accompanied with full product details – to include all door and window specifications etc.</p> <p>At this point it can be difficult to design out fully any issues identified, at best crime can only be mitigated against, as it does not fully reduce the opportunity of offences.</p> <p>To ensure that Secured by Design can be achieved, we have recommended the attaching of suitably worded conditions and an informative. The comments made can easily be mitigated early if the Architects and developer ensure that the ongoing dialogue with our department continues throughout the design and build process. This can be achieved by the below Secured by Design conditions being applied (Section 2). If the Conditions are applied, we request the completion of the relevant SBD application 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> <p>Section 2 - Secured by Design Conditions and Informative:</p> <p>In light of the information provided, we request the following Conditions and Informative:</p> <p>Conditions:</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</p>	

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	<p>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>Transport for London</p>	<p>Thank you for consulting TfL Spatial Planning.</p> <p>The site is located away from TfL assets and TLRN, and we will be largely content for Haringey Council to assess impact and mitigation on the local highway network and to determine this application, however there are references in the application to Active Travel Zone impacts and measures.</p> <p>As such TfL Spatial Planning wish to make the following comments.</p> <p>Car and cycle parking</p> <p>It is noted that the proposals remove an existing car park and provides five disabled persons parking spaces, which would be in line with London Plan policy. reduces the amount of car parking overall from that consented which is welcomed. Four disabled persons parking spaces will be provided from the outset, and the Car Park Design Management Plan shows where a further eight spaces, to reach a total of one space per 10 per cent of units would be accommodated should there be demand from eligible occupiers.</p> <p>It is noted that cycle provision is marginally above London Plan minimum standards, with 103 residential long-stay cycle parking spaces and which includes approximately 20 per cent - 23 spaces – as Sheffield stand spaces. This is complemented by an additional 16 spaces to the</p>	<p>Noted. Conditions and section 106 added to recommendation.</p>

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	<p>north of the site, including 4 enlarged Sheffield stand spaces. For residential visitors, 3 Sheffield stands providing 6 spaces are provided adjacent to Lawrence Road.</p> <p>It is very helpful to have an annotated plan in the Transport Statement of aisle widths and spacing between stands. For the Sheffield stands, 1.2 metres spacing between Sheffield Stands is the recommended minimum width for two conventional cycles, with 1.0 metres as an absolute minimum for two such cycles, and the majority of Sheffield stand parking are 1.0m apart. It would appear that there would be the opportunity to increase spacing between stands in the public realm at least.</p> <p>ATZ assessment</p> <p>It is welcomed that a daytime ATZ assessment has been carried out, although also disappointing that a dark hours night time assessment has not been carried out, especially given the nature of some of the observations and mitigations. The ATZ does suggest that, among other items, “opening the [Seven Sisters] match day station entrance at all times would increase footfall in the evenings, providing natural surveillance.” and for step-free access to the station. Opening the entrance for daily use is not something which is currently proposed, unless there were significant contributions from applications to mitigate impacts and to allow this entrance to be made suitable for daily use and staffed accordingly. Providing step free access would also require significant contributions from external sources.</p> <p>The assessment identifies some other relatively small scale works.</p> <p>As such, TfL would support Haringey Council in securing other measures such as improvements to footways, lighting, benches and tree planting.</p> <p>Impact</p> <p>The TA assessment uplift is not expected to give rise to a significant impact to require mitigation for bus or rail modes, although as above a contribution to public realm and streetworks would be welcomed.</p> <p>Summary</p>	

Stakeholder	Question/Comment	Response
	<p>There is no objection in principle to the development however:</p> <ul style="list-style-type: none"> • There should be amendments to spacing of Sheffield stand provision for oversized bicycles • There should be contributions to public realm works as identified in the ATZ assessment within Haringey Council control <p>ADDITIONAL COMMENTS:</p> <p>Access/gate</p> <p>Can you please include a pre-commence condition for plans to be sent to LBH Transport Planning for approval demonstrating the design of the vehicle gates, how it will be operated, submission of visibility splays and how the gate will be set back so that a vehicle can be fully berthed on their site not impeding the free flow of pedestrians on the public footway.</p> <p>S278 agreement</p> <p>The applicant will be required to enter into agreement with the Highway Authority under Section:</p> <p>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 and cycling 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: Works on Lawrence Road for the reconstruction/reinstatement of the footway and the installation of two new vehicle crossovers, removal and installation of on-street parking bays, and the repair of the footway.</p> <p>The applicant will be required to provide a detailed design for including lighting improvements, details will also be required in relation to the proposed works including but not limited to: widening, including adoption and long-term maintenance, the drawing should include, existing conditions surveys construction details, signing and lining, the scheme should be design in line with the 'Healthy Streets' indicators perspective, full list of requirements to be agreed with the Highways Authority.</p>	

Stakeholder	Question/Comment	Response
	<p>The applicant will be required to submit detailed drawings 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. Reason: To implement the proposed highways works to facilitate future access to the development Site and to protect the integrity of the highways network.</p> <p>Cycle parking</p> <p>The applicant will be required to submit plans showing accessible; sheltered, and secure cycle parking for 103 long-stay and 23 short-stay cycle parking spaces for residents and for the commercial 8 long-stay cycle parking spaces and 2 short-stay cycle parking spaces for approval. The quantity must be in line with the London Plan 2021 T5 Cycle and the design must be in line with the London Cycle Design Standard. No Development (including demolition) shall take place on site until the details have been submitted and approved in writing by the Council. REASON: to be in accordance with the published London Plan 2021 Policy T5, and London Cycle Design Standards (LCDS).</p> <p>Again, can the cycling condition be secured as a pre-occupation as it will influence final design of the cycle parking that they build.</p>	
Health & Safety Executive	<p>Scope of consultation</p> <p>1.1. The above planning application relates to a mixed-use development located in Lawrence Road, Tottenham, London. The development contains two buildings: a new 7- storey (GF plus L1 to L6; 19.45m to uppermost occupied floor) residential building, and an existing commercial building (GF plus L1; 4.08m to mezzanine level).</p> <p>1.2. The residential building will be served on all floors by two escape stairs, one of which is a firefighting stair forming part of a firefighting shaft. The firefighting shaft comprises: a firefighting stair, firefighting lift, and a dry rising fire main. The commercial building will be served by two escape stairs and will not be provided with a firefighting rising main.</p> <p>Previous consultations</p> <p>1.3. HSE issued a substantive response with the headline response: 'Concern,' on 7th of</p>	Noted.

Stakeholder	Question/Comment	Response
	<p>October 2024, under the reference pgo-5935, following a consultation received on 23rd of September 2024.</p> <p>1.4. HSE issued a substantive response with the headline response: ‘Concern,’ on 7th of November 2024, under the reference pgo-6057, following a consultation received on 17th of October 2024.</p> <p>1.5. HSE issued a substantive response with the headline response: ‘Concern,’ on 6th of December 2024, under the reference pgo-6218, following a consultation received on 15th of November 2024.</p> <p>Consultation</p> <p>1.6. A further consultation was received from the LPA on 10th of January 2025, providing amended design information (revised floor plan drawings), and a revised Fire Statement (dated 09/01/2025). For the avoidance of doubt, this substantive response relates to the applicant’s response/re-consultation application.</p> <p>1.7. Section 6 (building schedule) of the fire statement confirms that the design standards used are: BS9991 (‘Fire safety design, management, and use of residential buildings’), and BS9999 (‘Code of practice for fire safety in the design, management, and use of buildings’). HSE has assessed the application accordingly.</p> <p>1.8. Regarding the fire safety British Standard BS9991, HSE has assessed this application against BS9991: 2024, which came into effect on 30th of November 2024. HSE acknowledges that the planning application was validated on 21st of May 2024 and prepared before the extant standard came into effect, but revised/updated after the date when the extant standard came into effect.</p> <p>1.9. HSE raised a concern in the previous substantive response, regarding the fire service access, in particular, to the commercial building. The updated Site Location Plan and revised Proposed Ground Floor Plan drawings, show a new vehicle access into the proposed site/development.</p> <p>1.10. Section 10 (Fire service site plan) of the Fire Statement, states: “Fire service vehicle access is designed with a drive-through arrangement, eliminating the need for vehicles to turn</p>	

Stakeholder	Question/Comment	Response
	<p>around or reverse when exiting the site. The parking locations allow the fire service to mount their operations from 'safe air'." It is noted that the commercial building has access to within 45 metres of all areas of the building.</p> <p>1.11. The design change is noted. This will also be subject to assessment at later regulatory stages.</p> <p>1.12. Following a review of the information provided in the planning application, HSE is content with the fire safety design as set out in the project description, to the extent it affects land use planning considerations.</p> <p>Yours sincerely S.Bucur Sorin Bucur Fire Safety Information Assessor</p>	
<p>NEIGHBOURING PROPERTIES</p> <p>No of individual responses: 13</p> <p>Objecting: 12 Support: 1</p>	<p><u>Impact of neighbouring properties</u></p> <p>Officer comment: The position and scale of the proposed development in relation to neighbouring buildings ensures that the outlook, privacy and level of sunlight/daylight enjoyed by existing residents will not be adversely affected.</p> <p>Building too high/overbearing</p> <ul style="list-style-type: none"> • Loss of private views • Loss of daylight/sunlight to nearby properties • Overlooking/Loss of privacy • Subsidence/Cracking to existing houses along Collingdale • Increased noise and disruption • Overdevelopment • Loss of privacy (to 28 Lawrence Road) • Insufficient social/affordable housing • The rear flats of level 4 - 7 will directly overlook the gardens and windows of Collingwood Road residential properties. These should be amended to face the front of the street. • New facilities will not be available wider local community. 	<p>.Noted.</p>

Stakeholder	Question/Comment	Response
	<ul style="list-style-type: none"> • Disruption from construction works (Officer Comment: Conditions are applied requesting a Construction Management Plan. Hours of operation are limited) <p>Support</p> <ul style="list-style-type: none"> • Proposal with improve the streetscape and reduce pollution. • New commercial units will improve existing 'barren' frontage. <p>The following issues raised are not material planning considerations:</p> <ul style="list-style-type: none"> • Impact on property values (Officer Comment: This is a private matter and therefore not a material planning consideration) • Inadequate consultation (The LPA has sent letters to 800 addresses, displayed 8 site notices in the vicinity of the site and undertaken a Development Forum. In addition, the applicant also undertook a community engagement workshop) 	

Appendix 3 Plans and Images

Location Plan



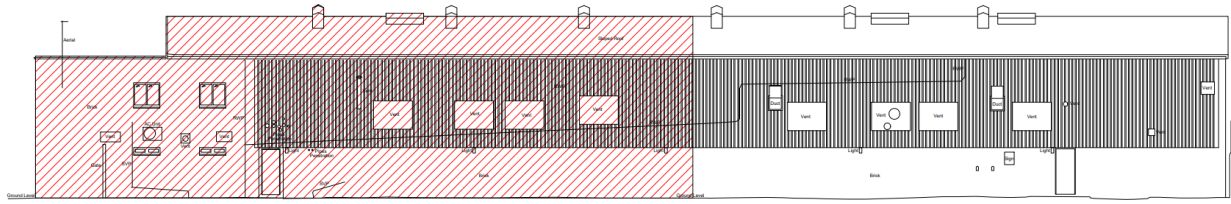
Aerial View Looking East (Towards Clyde Circus CA)



Aerial View Looking West (from Clyde Circus CA)



Partial demolition of existing commercial unit (red)



Front Elevtion (proposed)



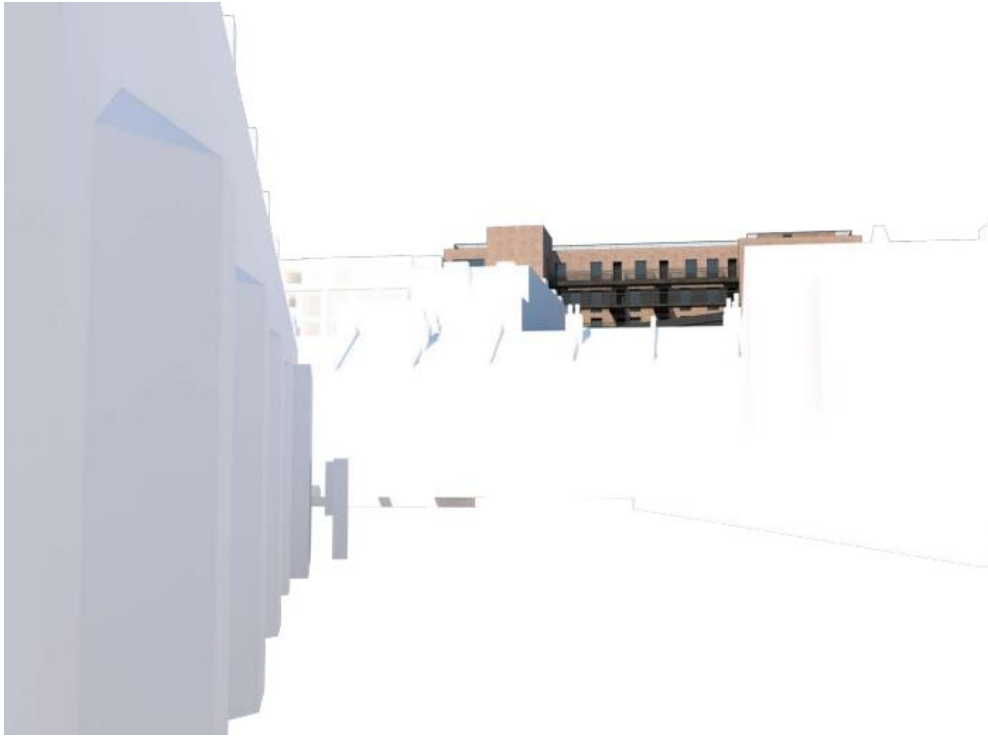
Rear View Looking west (towards Lawrence Road)



View From Lawrence Road (Looking North)



View From Conservation Area



Cross Section (Looking North)

Proposed Landscaping locations



Appendix 4 Quality Review Panel Report

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London Borough of Haringey Quality Review Panel

Report of Chair's Review Meeting: 30-48 Lawrence Road

Wednesday 21 February 2024
Alexandra House, 10 Station Road, London N22 7TY

Panel

Andrew Beharrell (chair)
Neha Tayal

Attendees

Carmel Keren	London Borough of Haringey
Rob Krzyszowski	London Borough of Haringey
Robbie McNaugher	London Borough of Haringey
John McRory	London Borough of Haringey (via Teams)
Biplav Pageni	London Borough of Haringey
Gareth Prosser	London Borough of Haringey
Richard Truscott	London Borough of Haringey
Tom Bolton	Frame Projects
Bonnie Russell	Frame Projects

Apologies / report copied to

Suzanne Kimman	London Borough of Haringey
Tania Skelli	London Borough of Haringey
Elizabetta Tonazzi	London Borough of Haringey
Bryce Tudball	London Borough of Haringey

Confidentiality

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

Report of Chair's Review Meeting
21 February 2024
HQRP137 _30-48 Lawrence Road

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1. Project name and site address

30 – 48 Lawrence Road, London N15 4EG

2. Presenting team

Michael Lynas	Boehm-Lynas
Jodane Walters	DP9 Limited

3. Planning authority briefing

The site at 30-48 Lawrence Road currently accommodates a large light industrial building, home to a dry-cleaning business and associated car parking.

The proposal is to part-retain the existing commercial building, removing the front ancillary office space and a full bay from the main warehouse. This will allow a new residential, mixed-use block to the Lawrence Road frontage, with potential commercial uses include a gym or occupation by multiple smaller businesses. A total of 56 residential units will also be created. The proposed homes are 90 per cent dual aspect, with both private and affordable housing. The proposal is car-free.

The scheme has been reviewed twice by the Quality Review Panel. Following the last meeting, held on 6 December 2023, the applicant has made a series of changes. These include modifying the entranceways, service areas and façade articulation. In addition, external amenity spaces have been substantially revised, along with changes to residential layouts and sustainability measures. The applicant currently proposes 19 per cent affordable housing.

Officers support the redevelopment of the site to align with the principles set out in the Tottenham Area Action Plan Phase 2 of the site allocation. They consider the architecture and layouts to be broadly acceptable, and asked for the panel's views on detailed aspects of the proposals, including security, ground floor access, mitigation of overheating, the experience of flats above the service yard entrance, character and quality of rooftop amenity space and the viability of the commercial units.



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4. Quality Review Panel's views

Summary

The panel thinks the proposals have progressed well and supports them, subject to detailed comments on massing, architecture, layout and amenity space.

The panel thinks that the architecture is developing well, and makes only detailed comments. It encourages variation in the spacing of balcony railings. It also encourages the use of more decoration in the western element of the residential building, and of subtle variations in colour for balconies and window frames, with lighter tones for the rear façade. Material colours should be conditions. The decision to raise the roof of the existing warehouse could be reconsidered but, if implemented, should be moved further from neighbours.

The panel suggests rotating the northern core to give residents direct access from the street, and simplify security arrangements. Regardless, the quality of the passageway along the northern boundary is important, and should be conditioned in any planning permission. The panel is pleased to see the addition of rooftop and sixth-floor amenity space. It thinks children's play should be located in the first-floor space, with upper spaces managed to avoid unsupervised child use. Screens should be considered to raise parapet heights. Defensible space is needed for first floor rooms overlooking the shared terrace. Daylight and sunlight analysis is needed to show what conditions will be like on the first-floor terrace.

Residential layouts are much improved, but the panel thinks the northernmost one-bedroom flats are too cramped and should be rethought, possibly as studios. Oversized flats are suited for use as wheelchair accessible units. Care should be taken to avoid overlooking from flats closest to the Vabel Building. First floor balconies should be increased in size to protect flats from service yard nuisance, and a management plan is needed to minimise disruption to residents. The panel supports the overall sustainability ambitions, but asks for reassurance that top floor flats will not overheat in the absence of solar shading.

These comments are expanded below.

Architecture

- The panel thinks that the architectural approach has developed positively since the previous review. Form and proportion are coming together well with the removal of the set-back top floor, and the residential building works better with the horizontal banding removed.
- The panel supports the suggestion that the spacing between balcony railings could increase as they ascend the building, and encourages the design team to try this out.
- The panel suggests that the projecting, western section of the residential building could be differentiated more from the element behind. Using stronger

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decoration would distinguish the two sections of the building, and respond to the character of the neighbouring building at No. 28 Lawrence Road.

- The panel also suggests that subtle colour could be introduced for balconies and window frames, to avoid too much black. This is particularly noticeable in the rear elevation of the residential building, where decks and soffits will have a significant impact. A more playful approach is encouraged, looking at lighter colours, particularly for the rear façade.
- Haringey officers should also condition brick and metalwork colours as part of a planning permission.

Ground floor

- The panel suggests that the northern residential core could be rotated, to provide direct residential access from Lawrence Road, via the western elevation. This would create a clear separation between the commercial and residential areas, making security easier to manage, and would also improve ground floor activation.
- Whether or not this change is made, the nature of the passageway along the north edge of the development needs consideration. It should feel safe and pleasant, and the panel encourages Haringey officers to condition the detailed design for this areas, including surface materials, soffits, and lighting, all of which will be important in creating a positive experience for users.
- The panel also suggests considering whether rotating the bin stores by ninety degrees and locating them across the southern end of the service yard would be beneficial.

Commercial building

- The panel questions whether the cost of raising the roof of the existing industrial building will deliver proportionate benefits. It suggests reconsidering this approach. If the roof remains at its current height, impact on the first-floor amenity space would be reduced. It could also release budget that could be used to provide more affordable units.
- If the applicant does decide to raise the roof, the panel asks that it is moved further away from the neighbouring houses to the east by at least a bay, to reduce the impact on their properties.

Residential layouts

- The panel thinks that the residential layouts have improved since the last review, including the proportion of dual aspect flats. The decision to separate access decks from the external wall works well in creating defensible space and reducing overlooking.



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- The panel recommends a detailed study of the potential for overlooking from bedrooms at the south-eastern corner of the residential building. They appear to have a view of the side of neighbouring balconies in the Vabel Building, but more detailed assessment is needed to ensure problems are avoided.
- The panel suggests that the northernmost one-bed flats are too narrow, and that other options should be considered. For example, they may work better as generous studio flats, or with a living room and a bedroom alcove.
- The panel is concerned that the flats immediately above the service yard entrance will suffer from noise, fumes and nuisance. It suggests that all the first-floor balconies should extend further from the building, as they do on floors above, which would protect these flats and provide more amenity space.
- The panel also emphasises the need to demonstrate how the service yard will be managed to reduce the impact of vehicle movements on residents, especially early in the morning and late at night.
- The panel notes that flats at the southern end of the residential building are oversized, and the additional space could be used more effectively. These units would be suitable locations for M4(3) wheelchair user adaptable flats, especially on the first floor where there is also direct access to the terrace amenity space.

Amenity

- The panel supports the introduction of rooftop amenity space on the top and sixth floors. The potential for these spaces to provide children's play space will be limited. The panel suggests that dedicated, equipped children's play space, if included, should be provided in the first-floor amenity spaces.
- A glass screen should be considered for the rooftop spaces to provide a 1500mm high parapet, which would both reduce wind impacts and improved safety for children.
- The panel also notes the need to consider how rooftop amenity spaces are designed and managed, to ensure uses are suitable: adult and supervised children's play, rather than unattended children's play.
- The panel asks for data to show how much daylight and sunlight will reach the first-floor amenity space. Although changes made to the massing will improve conditions, more analysis is required to demonstrate the quality of the space.
- The panel strongly supports tenure neutral access to amenity spaces. It suggests the applicant considers locating affordable family units on the first floor, to provide easy access to the first-floor amenity space.
- It is important to consider how to mitigate the impact of the first-floor amenity space on the three-bed flat overlooking it. The panel asks for thinking on how



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a more substantial defensible space can be created, for example using planting, especially outside bedroom windows.

Sustainability

- The panel supports the ambitious sustainability targets set for the development, and looks forward to seeing them delivered.
- The panel suggests that the design team should revisit the risk of overheating in west-facing, sixth floor flats. As there are no balconies to provide external shading, unlike the floors below, it is important to be confident that conditions will remain comfortable throughout the year.

Next steps

The panel is confident that the applicant can address its comments in discussion with Haringey officers.