

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.

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

Drawings

- D01-02 – 01 – Proposed Basement GA Plan
- D01-02 – 02 – Proposed Ground Floor GA Plan
- D01-02- 03 – Proposed First Floor GA Plan
- D01-02 – 04 – Proposed Second Floor GA Plan
- D01-02 – 05 – Proposed Third Floor GA Plan
- D01-02- 06 – Proposed Roof Plan
- D01-02 – 21 – Proposed Elevations
- D01-02 – 22 – Proposed Elevations – Colour
- D01-02 – 23 – Proposed Elevations – Context Indicated
- D01-02 – 24A – Proposed View Road Boundary Wall – Plan, Elevation & 3D Visual (Updated)
- D01-02 – 31 – Basement Floor – Planning Approved Overlay
- D01-02 – 32 – Ground Floor – Planning Approved Overlay
- D01-02 – 33 – First Floor – Planning Approved Overlay
- D01-02 – 34 – Second Floor – Planning Approved Overlay
- D01-02 – 35 – Third Floor – Planning Approved Overlay
- D01-02 – 36 – Proposed Elevations – Previous Planning Approved Outline Indicated
- D01-02 – 41 – Proposed Site Sections
- D01-02 – 51 – 3D Visual 1
- D01-02 – 52 – 3D Visual 2
- D01-02 – 53 – 3D Visual 3
- D01-02 – 54 – 3D Visual 4
- D01-02 – 55 – 3D Visual 5
- D01-02 – 56 – 3D Visual 6
- D01-02 – 57 – 3D Visual 7
- D01-02 – 71H Proposed Site Plan
- D01-02 – 81 – Site Location Plan
- D01-02 – SK44 – Proposed Basement GA Plan – Apartments – Accommodation Schedule (Additional)
- D01-02 – SK45 – Proposed Ground Floor GA Plan – Apartments – Accommodation Schedule (Additional)
- D01-02 – SK46 – Proposed First Floor GA Plan – Apartments – Accommodation Schedule (Additional)
- D01-02 – SK47 – Proposed Second Floor GA Plan – Apartments – Accommodation Schedule (Additional)
- D01-02 – SK48 – Proposed Third Floor GA Plan – Apartments – Accommodation Schedule (Additional)

- D01-02 – SK49 – ASHP Enclosure Visuals – Comparison (Additional)
- D01-02 – SK50 – ASHP Enclosure Visuals – Additional & Roof Plan (Additional)
 - o 2169-GUA-DR-L-001 10 Illustrative Landscape Masterplan (Updated)
 - o 21069-GUA-DR-L-002 9 Urban Greening Factor Plan (Updated)
 - o 21069-GUA-DR-L-003 8 Planting Schedules (Updated)
 - o 21069-GUA-DR-L-004 12 Landscape General Arrangement (Updated)
- 21047_Mary Feilding Internal Daylight Sunlight Report March 2025 + Appendices (Additional)
 - o 21034-MA-DR-TS01-REV A Appendices-1-4 (Updated) Report No: 13786_R02e (Updated)

Documents

Design & Access Statement; Heritage Assessment; • Ecological Assessment; • Energy Statement; • Circular Economy Statement and Appendices; • Surface Water and Foul Drainage Statement; • Healthy Streets Transport Assessment; • Framework Operational Site Waste Management Plan; • Sustainability Statement; • Air Quality Assessment; • Whole Life Cycle Carbon Emissions Assessment and Template; • Daylight and Sunlight Report; • Fire Statement; • Planning Statement

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

Detailed Drawings and External Materials

- 3 Prior to the commencement of building works above grade, 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) Details of windows and doors
 - d) Details of entrances, which shall include a recess of at least 115mm;
 - e) Details and locations of rain water pipes; and
 - f) Details of balconies, privacy screens and balustrading
 - g) Details of decorative brickwork (scale of 1:10 or 1:5)
 - h) Details of plant screening

Shall be submitted to, and approved in writing by, the Local Planning Authority. A sample panel of brickwork which demonstrates the proposed bricks, mortar and bonding pattern(s) shall be made available to be viewed on site, windows, roof, glazing, balustrade, shall also be provided. 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 D4 and HC1 of the London Plan 2021, Policy SP11 of the Local Plan 2017, Policies DM1 and DM9 of the Development Management Development Plan Document 2017, and Policy DH2 of the Highgate Neighbourhood Plan 2017.

Boundary Treatments

- 4 Prior to occupation of the development hereby permitted details of exact finishing materials to the boundary treatments and site access controls shall be submitted to, and approved in writing, by the Local Planning Authority. Once approved the details shall be provided as agreed and implemented in accordance with the approval.

Reason: In order to provide a good quality local character, to protect residential amenity, and to promote secure and accessible environments in accordance with Policy D4 of the London Plan 2021, Policies DM1, DM2 and DM3 of the Development Management Development Plan Document 2017 and Policy DH2 of the Highgate Neighbourhood Local Plan 2017.

Hard and Soft Landscaping

- 5 Prior to the commencement of the development hereby permitted above slab level 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. These details shall include information regarding, as appropriate:

- a) Proposed finished levels or contours;
- b) Means of enclosure including gates and boundary fencing;
- c) Hard surfacing materials;
- d) Minor artefacts and structures (e.g. Furniture, play equipment, refuse or other storage units, signs, lighting etc.); and
- e) Proposed and existing functional services above and below ground (e.g. Drainage power, communications cables, pipelines etc. Indicating lines, manholes, supports etc.).

Soft landscape works shall include:

- f) Planting plans;
- g) Written specifications (including details of cultivation and other operations associated with plant and/or grass establishment);
- h) Schedules of plants, noting species, plant sizes and proposed numbers/densities where appropriate; and
- i) Implementation and management programmes.

The soft landscaping scheme shall include detailed drawings of:

- j) Any new trees and shrubs to be planted together with a schedule of species.

The approved scheme of planting, seeding or turfing comprised in the approved details of landscaping shall be carried out and implemented in 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 for the lifetime of the development.

Reason: In order for the Local Planning Authority to assess the acceptability of any landscaping scheme in relation to the site itself, thereby ensuring a satisfactory setting for the proposed development in the interests of the visual amenity of the area and to accord with Policies D4 and G5 of the London Plan 2021, Policy SP11 of the Local Plan 2017 and Policies DM1 and DM2 of the Development Management Development Plan Document 2017.

External Lighting

- 6 Prior to occupation of the development hereby approved details of all external lighting to building facades, street furniture, communal and public realm areas shall be submitted to, and approved in writing by, the Local Planning Authority, in consultation with the Metropolitan Police. The agreed lighting scheme shall be installed as approved prior to occupation, and retained as such thereafter for the lifetime of the development.

Reason: To ensure the design quality of the development and also to safeguard residential amenity in accordance with Policies D4 and D11 of the London Plan 2021, Policy SP11 of the Local Plan 2017 and Policy DM1 of the Development Management Development Plan Document 2017.

Site Levels

- 7 No development shall proceed until details of all existing and proposed levels on the site in relation to the adjoining properties have been submitted to, and approved in writing by, the Local Planning Authority. The development shall be built in accordance with the approved details.

Reason: In order to ensure that any works in conjunction with the permission hereby granted respects the height of adjacent properties through suitable levels on the site in accordance with Policy D4 of the London Plan 2021, Policy SP 11 of the Local Plan 2017 Policy DM1 of the Development Management Development Plan Document 2017, and Policy DH2 of the Highgate Neighbourhood Local Plan 2017.

Secure by Design Accreditation

- 8 Prior to the commencement of above ground works to each building or part of a building hereby permitted, 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 guidelines at the time of above grade works of each building within the development.

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

Reason: To ensure a safe and secure development and reduce crime in accordance with Policies D4 and D11 of the London Plan 2021, Policy SP11 of the of Local Plan Strategic 2017 and Policies DM1 and DM2 of the Development Management Development Plan Document 2017.

Secure by Design Certificate

- 9 Prior to the occupation of each building or part of a building or use, 'Secured by Design' certification shall be obtained for such building or part of such building or its use and therefore all features are to be retained. This shall be submitted to, and approved in writing by, the Local Planning Authority.

Reason: To ensure a safe and secure development and reduce crime in accordance with Policies D4 and D11 of the London Plan 2021, Policy SP11 of the Local Plan 2017 and Policies DM1 and DM2 of the Development Management Development Plan Document 2017.

Secure by Design Accreditation at the final fitting stage

- 10 The care home and rehabilitation facility must achieve the relevant Secured by Design Accreditation at the final fitting stage, prior to residential occupation of such building in accordance with condition B (Secured by Design) and commencement of business. Details shall be submitted to and approved, in writing, by the Local Planning Authority

Reason: To ensure a safe and secure development and reduce crime in accordance with Policies D4 and D11 of the London Plan 2021, Policy SP11 of the Local Plan 2017 and Policies DM1 and DM2 of the Development Management Development Plan Document 2017.

Contaminated Land

- 11 Before the development hereby permitted commences other than for investigative work:

a) A desktop study shall be carried out which shall include the identification of previous uses, potential contaminants that might be expected, given those uses, and other relevant information. Using this information, a diagrammatical representation (Conceptual Model) for the site of all potential contaminant sources, pathways and receptors shall be produced. The desktop study and Conceptual Model shall be submitted to, and approved in writing by, the Local Planning Authority.

b) If the desktop study and Conceptual Model indicate any risk of harm, a site investigation shall be designed for the site, using information obtained from the desktop study and Conceptual Model. The investigation must be comprehensive enough to enable: an updated risk assessment to be undertaken, refinement of the Conceptual Model, and the development of a Method Statement Detailing the remediation requirements. The updated risk assessment and refined Conceptual Model along with the site investigation report, shall be submitted and approved in writing by the Local Planning Authority.

c) If the updated risk assessment and refined Conceptual Model indicate any risk of harm, a Method Statement detailing the remediation requirements and any post remedial monitoring, using the information obtained from the site investigation, shall be submitted to, and approved in writing by, the Local Planning Authority prior to that remediation being carried out on site. The remediation strategy shall then be implemented as approved.

d) Before the development is occupied and where remediation is required, a verification report demonstrating that all works detailed in the remediation method statement have been completed shall be submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure the development can be implemented and occupied with adequate regard for environmental and public safety in accordance with Policy DM23 of the Development Management Development Plan Document 2017.

Unexpected Contamination

- 12 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.

Reason: 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 and in accordance with Policy DM27 of the Development Management Development Plan Document 2017.

Non-Road Mobile Machinery (NRMM)

- 13 a) Prior to the commencement of the development, evidence of site registration at <http://nrmm.london/> to allow continuing details of Non-Road Mobile Machinery (NRMM) and plant of net power between 37kW and 560 kW to be uploaded during the construction phase of the development shall be submitted to, and approved by, the Local Planning Authority.
- b) Evidence that all plant and machinery to be used during the demolition and construction phases of the development shall meet Stage IIIA of EU Directive 97/68/EC for both NOx and PM emissions shall be submitted to, and approved in writing by, the Local Planning Authority.
- c) During the course of the demolition, site preparation and construction phases, an inventory and emissions records for all Non-Road Mobile Machinery (NRMM) shall be kept on site. The inventory shall demonstrate that all NRMM is regularly serviced and detail proof of emission limits for all equipment. All documentation shall be made available for inspection by Local Authority officers at all times until the completion of the development.

Reason: To protect local air quality and comply with Policy SI1 of the London Plan 2021 and the GLA NRMM LEZ.

Air Quality and Dust Management Plan

- 14 No works shall be carried out on the site until a detailed Air Quality and Dust Management Plan (AQDMP), detailing the management of demolition and construction dust, has been submitted to, and approved in writing by, the LPA. The plan shall be in accordance with the GLA SPG Dust and Emissions Control and shall also include a Dust Risk Assessment. The works shall be carried out in accordance with the approved details thereafter.

Reasons: To comply with Policy 7.14 of the London Plan 2021 and GLA SPG Dust and Emissions Control 2014.

Considerate Constructors Scheme

- 15 Prior to the commencement of any works on the site the Contractor Company must register with the Considerate Constructors Scheme. Proof of registration must be submitted to, and approved in writing by, the Local Planning Authority prior to commencement of any works. Registration shall be maintained throughout construction.

Reason: To Comply with Policy 7.14 of the London Plan 2021.

Energy Statement

- 16 The development hereby approved shall be constructed in accordance with the Energy Statement prepared by Hodkinson (dated Nov 2024) delivering a minimum 43.3% improvement on carbon emissions over 2021 Building Regulations Part L, with high fabric efficiencies, INDIVIDUAL air source heat pumps for apartments, communal air source heat pump for rehabilitation clinic, and a minimum 25kWp solar photovoltaic (PV) array.

(a) Prior to above ground construction, details of the 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 18% reduction;
- Details to reduce thermal bridging [majors only];
- Location, specification and efficiency of the proposed ASHPs (Coefficient of Performance, Seasonal Coefficient of Performance, and the Seasonal Performance Factor), with plans showing the ASHP pipework and noise and visual mitigation measures;
- Specification and efficiency of the proposed Mechanical Ventilation and Heat Recovery (MVHR), with plans showing the rigid MVHR ducting and location of the unit;
- Details of the PV, demonstrating the roof area has been maximised, with the following details: a roof plan; the number, angle, orientation, type, and efficiency level of the PVs; how overheating of the panels will be minimised; their peak output (kWp) and annual energy generation (kWh/year); 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 in accordance with the details so approved prior to occupation, 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 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 in writing 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 to

accord with Policy S12 of the London Plan, 2021 Policy SP4 of the Local Plan 2017 and Policy DM22 of the Development Management Development Plan Document 2017.

BREEAM

- 17a) Prior to commencement of the development hereby permitted for the care home and rehabilitation facility 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 shall be accompanied by a tracker demonstrating which credits are being targeted, and why other credits cannot be met on site.
- b) Within 6 months of commencement on site, the Design Stage Accreditation Certificate must be submitted. The development shall then be constructed in strict accordance with the details so approved, shall achieve the agreed rating and shall be maintained as such thereafter for the lifetime of the development.
- c) Prior to occupation, the Post-Construction Stage Assessment and tool, and evidence that this has been submitted to BRE shall be submitted for approval, confirming that the development has achieved a BREEAM "Very Good" outcome (or equivalent), aiming for "Excellent", subject to certification by BRE.
- d) Within 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.

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 to the Local Planning Authority for written approval with 2 months of the submission of the post construction certificate. Thereafter the schedule of remedial works must be implemented on site within 3 months of the Local Authority's approval of the schedule, or the full costs and management fees given to the Council for offsite remedial actions.

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

Living Roofs

- 18 (a) Prior to the above ground commencement of development hereby permitted, details of the living roofs must be submitted to, and approved in writing by, the Local Planning Authority. Living roofs must be planted with flowering species that provide amenity and biodiversity value at different times of year. Plants must be grown and sourced from the UK and all soils and compost used must be peat-free, to reduce the impact on climate change. The submission shall include:
- i) A roof plan identifying where the living roofs will be located;
- ii) A section demonstrating settled substrate levels of no less than 120mm for extensive living roofs (varying depths of 120-180mm), and no less than 250mm for intensive living roofs (including planters on amenity roof terraces);

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

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

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

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

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

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

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

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 Policies G1, G5, G6, S11 and S12 of the London Plan 2021, and Policies SP4, SP5, SP11 and SP13 of the Local Plan 2017.

Whole Life Cycle Carbon Emissions

- 19 The development hereby approved shall be constructed in accordance with the Whole Life Cycle Carbon Emissions Assessment prepared by Hodkinson (dated June 2024).

Prior to the commencement of the development hereby permitted, excluding demolition, an update to the approved Whole Life-Cycle Carbon assessment to reaffirm the proposed strategy or demonstrate improvements, shall be submitted to, and approved in writing by, the Local Planning Authority, demonstrating that the Whole Life-Cycle Carbon emissions savings of the development achieve at least the GLA's Standard Benchmark and setting out further opportunities to achieve the GLA's Aspirational Benchmark set out in the GLA's Whole Life-Cycle Assessment Guidance.

The assessment shall include details of measures to reduce carbon emissions throughout the whole life-cycle of the development and provide calculations in line with the Mayor of London's guidance on Whole Life-Cycle Carbon Assessments, and the development shall be carried out in accordance with the approved details and operated

and managed in accordance with the approved assessment for the lifetime of the development.

Reason: In the interests of sustainable development and to maximise on-site carbon dioxide savings in accordance with Policy SI2 of the London Plan 2021, Policy SP4 of the Local Plan 2017 and Policy DM21 of the Development Management Development Plan Document 2017.

Biodiversity Net Gain Plan

- 20 a) Prior to the commencement of the development hereby permitted, a Biodiversity Net Gain Plan shall be submitted to, and approved in writing by, the Local Planning Authority. This shall include the details of ecological enhancement measures and ecological protection measures, plans showing the proposed location of ecological enhancement measures, a sensitive lighting scheme, justification for the location and type of enhancement measures by a qualified ecologist, and how the development will support and protect local wildlife and natural habitats. A biodiversity net gain of 10% must be achieved firstly by maximising all on-site biodiversity enhancement measures, and then, if needed, through off-site credits.

(b) Prior to the occupation of development hereby permitted, photographic evidence and a post-development ecological field survey and impact assessment shall be submitted to, and approved in writing by, the Local Planning Authority to demonstrate the delivery of the ecological enhancement and protection measures are in accordance with the approved measures and in accordance with CIEEM standards.

The development shall accord with the details as approved, and the details shall be retained for the lifetime of the development.

Reason: To ensure that the development provides the maximum provision towards the creation of habitats for biodiversity and the mitigation and adaptation of climate change and to be in accordance with Policies G1, G5, G6, SI1 and SI2 of the London Plan 2017, and Policies SP4, SP5, SP11 and SP13 of the Local Plan 2017.

Urban Greening Factor

- 21 Prior to completion of the development hereby permitted, an Urban Greening Factor calculation shall be submitted to, and approved in writing by, the Local Planning Authority demonstrating how a factor of 0.4 has been met through greening measures. The development shall thereafter be retained in accordance with the approved details for the lifetime of the development.

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 and to be, in accordance with Policies G1, G5, G6, SI1 and SI2 of the London Plan 2021, and Policies SP4, SP5, SP11 and SP13 of the Local Plan 2017.

Overheating Report

- 22 Prior to above ground works of the relevant care home or domestic use, a final Overheating Report shall be submitted to, and approved in writing by, the Local Planning Authority. The submission shall assess the overheating risk with both open and closed windows in line with CIBSE TM52 and TM59 (using Category I for the care home element under the London Weather Centre TM49 weather DSY1-3 files for the

2020s, and future weather files DSY1 for the 2050s and 2080s) and demonstrate how the overheating risks have been mitigated and removed through design solutions and provide a retrofit plan.

This report shall include:

- Annotated plans showing which habitable rooms will be affected by noise constraints;
- Analysis I: Model all rooms with DSY1 2020s weather file and openable windows demonstrating how the rooms will not overheat, and the passive measures have been maximised in line with the Cooling Hierarchy;
- Analysis II: Modelling of all rooms with DSY1 2020s weather file and rooms affected by noise and/or air pollution, or risk of crime with closed windows, demonstrating how the rooms will not overheat, with appropriate overheating mitigation measures in line with the Cooling Hierarchy and the Acoustics Ventilation and Overheating Residential Design Guide.
- For both analyses, clearly setting out the baseline scenario and additional modelled scenarios to test mitigation measures required to pass the overheating assessment.
- Details of the design measures incorporated within the scheme in line with the Cooling Hierarchy (including details of the feasibility of prioritising passive cooling and ventilation measures) to ensure adaptation to higher temperatures are addressed, the spaces do not overheat, and the use of active cooling is avoided, including the fixing mechanism, specification, and shading coefficient of any internal and external shading features, and the energy demand of the active cooling for communal areas;
- 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 with confirmation that these can be integrated within the design (e.g., if there is space for pipework to allow the retrofitting of cooling and ventilation equipment);
- Confirmation who will be responsible to mitigate the overheating risk once the development is occupied.

Prior to occupation/use, the development must be built in accordance with the overheating measures as approved; and those measures shall be 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 Policy SI4 of the London Plan 2021, Policy SP4 of the Local Plan 2017 and Policy DM21 of the Development Management Development Plan Document 2017.

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Arboricultural Impact Assessment

- 23 The development hereby approved shall be constructed in accordance with the Arboricultural Impact Assessment prepared by Tyler Grange (Report No. 13786_R02 Rev E).

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 in accordance with Policy G7 of the London Plan 2021, Policy SP13 of the Local Plan 2017 and Policy OS2 of the Highgate Neighbourhood Plan 2017.

Demolition and Construction Management Plan

- 24 No development shall take place, including any works of demolition, until a detailed demolition and construction management plan for the entire development (including the basement) s has been submitted to, and approved in writing by, the Local Planning Authority. Only the approved details shall be implemented.

Reason: In the interests of residential amenity and safety, and Policy DM18 of the Development Management Development Plan Document 2017 and Policy DH7 of the Highgate Neighbourhood Local Plan 2017.

Cycle Parking

- 25 Prior to occupation/use plans showing accessible, sheltered, and secure long stay cycle parking - 8 for the care home element of the proposal, and 16 for the residential element shall have been submitted to, and approved in writing by, the Local Planning Authority. The design must be in line with the London Cycle Design Standard. The development shall not be occupied until the cycle parking has been provided; and it shall thereafter be retained for the lifetime of the development.

Reason: To be in accordance with the Policy T5 of the London Plan 2021.

Delivery and Servicing Plan

- 26 A final Delivery and Servicing Plan (DSP) shall have been submitted to, and approved in writing by, the Local Planning Authority 6 months prior to the development being occupied. The DSP must be in place prior to occupation/use of the development. The delivery and service plan must also include a waste management plan which includes details of how refuse is to be collected from the development. The plan shall 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 shall also 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 shall be produced in line with [TfL guidance](#). The final DSP must be reviewed annually in line with the travel plan for a period of 3 years, unless otherwise agreed, in writing in advance, by the Local Planning Authority, in consultation with the local highways 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.

Active and Passive EV Charging

- 27 of 2 active and 2 passive electric vehicle charging points to serve the on-site parking spaces from the onset must be provided in line with the London Plan.

Reason: To be in accordance with Chapter 5 of the Development Management Development Plan Document and Policy T6.2 of the London Plan 2021.

Wheelchair Accessible Car Parking

- 28 No development shall take place until full details demonstrating how wheelchair accessible car parking spaces will be provided for employees shall be submitted to and approved in writing by the Local Planning Authority

Only the approved details shall be implemented and retained thereafter.

Reason: In order to ensure the development is in accordance with Policy T6.5 of the London Plan 2021.

Car Parking Management Plan

- 29 No development shall take place until a car parking management plan is provided which must include details on the allocation and management of the on-site car parking spaces including all accessible car parking spaces.

Only the approved details shall be implemented and retained thereafter

Reason: To manage the on-site car parking provision of the proposed development so that it is used efficiently and only by authorised occupiers. To protect the amenity of the site users. To promote sustainable travel

Satellite Dishes/TV antennae

- 30 The placement of a satellite dish or television antenna on any external surface of the development is precluded, with the exception of a communal solution, details of which shall have been submitted to, and agreed in writing by, the Local Planning Authority prior to the occupation of the development hereby approved. The provision shall be retained as installed thereafter.

Reason: To protect the visual amenity of the locality in accordance with Policies DM1 and DM3 of the Development Management Development Plan Document 2017 and Policy DH5 of the Highgate Neighbourhood Plan 2017.

Extract flues/fans

- 31 Prior to occupation of the development hereby permitted, details of any extract fans or flues required shall have been submitted to, and approved in writing by, by the Local Planning Authority. The development shall thereafter be implemented and retained in accordance with the approval.

Reason: In order to ensure that the proposed development does not prejudice the enjoyment by neighbouring occupiers of their properties in accordance with Policy DM23 of the Development Management Development Plan Document 2017 and Policy DH9 of the Highgate Neighbourhood Plan 2017.

Care Home – C2 Use restriction

- 32 Notwithstanding the provisions of the Town & Country Planning (Use Classes) Order 1987, or any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order, the care home shall be occupied by Use Class C2 only with a rehabilitation clinic and shall not be used for any other purpose, unless approval

is obtained to a variation of this condition through the submission of a planning application

Reason: In order to restrict the use of the premises in the interest of the amenities of the area in line with Policy DM1 of the Haringey Development Management Development Plan Document 2017.

Telecommunications Infrastructure

- 33 Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) (amendment) (No.2) Order 2016 - Development not permitted: small antennas installed, replaced or altered on a building which is not a dwellinghouse, no telecommunications apparatus shall be installed on the buildings hereby permitted without the prior written agreement of the Local Planning Authority.

Reason: In order to control the visual appearance of the development in accordance with Policies DM1 and DM3 of the Development Management Development Plan Document 2017 and Policy DH5 of the Highgate Neighbourhood Plan 2017.

Fire safety

- 34 The development shall not be occupied/used unless it has been carried out in accordance with the fire statement submitted prepared by N Lambert dated 02/04/2024. .

Reason: In the interest of fire safety to comply with Policy D12 of the London Plan 2021.

Noise from Plant/Equipment

- 35 Noise arising from the use of any plant and associated equipment shall not increase the existing background noise level (LA90 15mins) when measured (LAeq 15mins) 1 metre external from the nearest residential or noise sensitive premises and vibration/structure borne noise derived from the use of any plant or equipment shall not cause nuisance within any residential unit or noise sensitive premises.

Reason: To protect residential amenity in accordance with Policies DM1 and DM23 of the Development Management Development Plan Document 2017 and Policy DH9 of the Highgate Neighbourhood Plan 2017.

Legacy of Mary Feilding

36. Prior to the commencement of development, options for honouring the history and legacy of Lady Mary Feilding as part of the proposed development shall be submitted to, and approved in writing by, the Local Planning Authority. These works shall thereafter be carried out as approved and retained for the lifetime of the development.

Reason: To preserve the local history of the site in the interest of local heritage in compliance with Policy HC1 of the London Plan 2021, Policy SP12 of the Local Plan 2017 and Policies DM1 and DM9 of the Development Management Development Plan Document 2017.

Air Quality Neutral

- 37 The development hereby approved shall not be occupied/used until it has achieved the Air Quality Neutral position, as set out in the hereby approved Air Quality Assessment prepared by Air Quality Consultants dated June 2024

Reason: To protect local air quality and comply with Policy SI1 of the London Plan 2021 and the GLA NRMM LEZ.

INFORMATIVES:

Positive and Proactive

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

CIL

Based on the information given on the plans, the Mayoral CIL charge will be £13,436.01 (189 sqm x £71.09) and the Haringey CIL charge will be £81,939.06 (189sqm x £433.54). These rates are based on the Annual CIL Rate Summary for 2024, which will increase if the decision notice is issued in 2025 in accordance with the published Annual CIL Rate Summary for 2025. 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.

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.

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.

Naming and Numbering: The new development will require naming and 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 suitable addresses.

Fire Brigade: The London Fire Brigade strongly recommends that sprinklers are considered for new developments and major alterations to existing premises,

particularly where the proposals relate to schools and care homes. Sprinkler systems installed in buildings can significantly reduce the damage caused by fire and the consequential cost to businesses and housing providers and can reduce the risk to life. The Brigade's opinion is that there are opportunities for developers and building owners to install sprinkler systems in order to save money, save property and protect the lives of occupiers.

Asbestos: 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.

Metropolitan Police Service Designing Out Crime The applicant must seek the 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.

Thames Water – underground assets

The proposed development is located within 15 metres of Thames Water's underground assets and as such, the development could cause the assets to fail if appropriate measures are not taken. Please read their 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 Thames Water pipes or other structures. <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-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

Thames Water – groundwater risk management

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.

Thames Water – water pressure

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.

Appendix 2 – Plans and Images



Site location plan



Birds eye view



Proposed floor plans



Comparative floorplan with the extant permission



Height and scale comparison with extant scheme



Illustrative view of residential building along North Hill



Illustrative view of care home and rehabilitation clinic from View Road



View Road Boundary Wall - 3D Visual 1



View Road Boundary Wall - 3D Visual 2

103-107 NORTH HILL, HIGHGATE



Appendix 1 Consultation Responses from internal and external agencies

Stakeholder	Question/Comment	Response
Design	<ol style="list-style-type: none"> <li data-bbox="495 379 1738 715">1. The council supports the introduction of the new C3 use class at North Hill, despite the loss of 20 special need housing units in the new proposal. The overall scale of the development above ground, the footprint and the elevations along the site frontages remain largely unchanged from the existing planning permission. The basement and associated light wells have been omitted along View road, and an additional light well has been incorporated in the North Hill frontage. The View Road façade with its gable ends, dormer windows, roof articulation and architectural detailing references Queen Anne style of architecture. In contrast the North Hill façade is stepped into three bay, and is a contemporary interpretation of a Georgian terrace. The window proportions decrease in height from the floor as they scale the building and the prominent soldier courses running across enhance the design of the North Hill frontage. The locality comprises a mix of classical, traditional, and modern architectural styles and those expressed in the elevations are prominently referenced in the area. <li data-bbox="495 746 1738 810">2. The layout of the proposed development is considerate of the neighbouring properties and generally consistent with the Council's local planning policy on daylight, sunlight, and shadowing. <li data-bbox="495 842 1738 1058">3. The North Hill residential flats are oriented along the NE - SW axis and provided with a rear amenity space and a well landscaped frontage, significantly improving the green cover along North Hill. The three-bedroom unit located in the basement is flanked by three light wells and accessed internally through the staircase and lift core, and externally through an outdoor staircase in the sunken garden. The sunken garden offers a safe amenity space for the family-sized dwelling, and its south aspect ensures it is well-lit despite the partially overhanging balconies two floors above on the first, second and third floors. <li data-bbox="495 1090 1738 1305">4. The projecting balconies of the residential flats are fitted with screens to the east and west to prevent overlooking on the neighbouring properties however, more clarity is needed on its design and materiality. Although the flats are considerate of their outlook, Bedroom 1 in the northern flat on the ground floor is not adequately screened by the landscaping in the rear communal garden. The shared space outside the bedroom will be well-used to access the cycle store and the seating area directly opposite it. Therefore, a dense screen, such as a 1.2m high hedge should be provided to block visibility to the bedroom. 	<p data-bbox="1760 347 1966 371">Comments noted</p> <p data-bbox="1760 411 2011 563">The landscaped plan has been revised to include a 1.2m high hedge to address point 4</p> <p data-bbox="1760 635 2029 754">The landscaped plan has been revised to include a green roof to address point 5</p>

	<p>5. On the third floor of the residential flats, a section of the slab has been indicated as a flat roof with no access to prevent overlooking on neighbouring properties. A green roof or some form of green cover should be provided here to avoid leaving it as a bare slab.</p> <p>6. There is a loss of green cover along the southern boundary abutting View Road to accommodate surface parking, compared to both the existing and the planning permission. Despite which there is a greater environmental and sustainability gain in not digging out and building a large basement per the existing planning permission. Additionally, the proposed landscaping and trees along this boundary seem sufficient to soften the visibility of the parked cars.</p> <p>7. The proposed retaining boundary wall along View Road replaces an old structure with established vegetation creeping over its parapet. The new wall consists of a low-lying brick wall interspersed with regularly spaced brick piers infilled with metal railings, and it is nearly the same height as the existing wall and provides better animation to the street. While it is necessary to replace the old boundary wall the new wall is neither better nor worse than the existing one.</p>	
Conservation	<p>Comments dated 12/03/2025</p> <p>The site lies within the Highgate conservation area and adjacent to a row of Grade II listed buildings, 109-119 North Hill. The townscape along North Hill is characterised by the varied and down-sloping topography of The Bank, and three to four storey buildings of various age well set-back from the pavement behind their front gardens with a wide streetscape. The main elevation of the existing office building of the Mary Feilding Guild Care Home fronts North Hill. The existing office building on North Hill is linked through a series of utilitarian extension buildings to the original 1920's care home building fronting View Road. View Road is a quiet residential street where several listed and locally listed large houses comfortably set in large sites are complemented by leafy front gardens and generous, deep rear gardens and contribute to a more suburban character.</p> <p>The previous scheme on this site was subject to an extensive set of negotiations and design refinement. Ultimately it was considered that whilst that previous scheme would be considered cause some less than substantial harm, this was at the lower end of the spectrum and the public benefits would outweigh this harm. The fundamental aspects of the proposed schemes design, and its assessment of the site and its context remain, the mass of the proposed buildings and their design is predominantly the same, however the newly proposed gap would be considered beneficial over the previous scheme, this would revert the site somewhat back to its historic urban grain, with two separate buildings to each street frontage and this is welcomed. whilst the introduction of balconies, and associated privacy screening would introduce some greater high level mass, this would still be considered an improvement in the relationship to the listed terrace as this would be a lot less</p>	<p>Comments noted Conditions included</p> <p>The proposed front boundary wall along View road has been revised to address the Conservation Officers concern</p> <p>The ASHP and screen have been repositioned to address the Conservation Officers concern</p>

	<p>dominant than the previously proposed greater built form. The quality of the detailing for the balconies and screening should be ensured through condition.</p> <p>However, most of the other changes proposed are in relation to new servicing requirements and parking which have had subsequent consequences for the landscaping. Several of these changes have been amended as part of new pre-application discussions and the general extent of proposed landscaping has been better retained.</p> <p>The height of the north hill facing block was carefully designed and tested. However, the proposals now include a much larger amount of plant to the roof and associated screening. The views show that this would be visible in views from the road, particularly from the south and would obscure the view of the chimney stack at No. 109, particularly during the winter months. The plant screening would appear to be the cause of this visual impact and on the plans the arrangement of the ASHPs appears to an inefficient layout with a large amount of space inside the screening. Whilst the use of ASHPs is supported, the plant needs to be arranged and screened appropriately to reduce its visual impact as much as possible. The proposed layout of the rooftop plant should be reconsidered designed to reduce its impact so there is as little screening as possible.</p> <p>There are some aspects of the proposed landscaping which need some more careful consideration than the basic outline indicated on the plans. The frontage to North Hill has been somewhat downgraded by the retention of the two car parking spaces. Whilst the proposed would still represent a beneficial change from the existing, the entrance is now less legible because of the various conflicting uses this small frontage now needs to negotiate, as the path no longer aligns with the building and the space feels a little muddled. These detailed design aspects can be resolved through an appropriate landscaping condition.</p> <p>The main alteration to the View Road is the alterations to the boundary wall and landscaping to include car parking. The previous scheme was supported in part because it <i>retaining a number of established features of this part of the conservation area such as the enclosed nature of the View Road building, the suburban, residential, verdant character of View Road</i>". The proposed new boundary wall is much lower and opens out onto the proposed car park, and would conflict with the principle of an enclosed sub-urban garden with a building sat behind greenery which was a positive characteristic of the previous scheme.</p> <p>The inclusion of a car park along View Road would be somewhat incongruous and would instead serve to make the extent of hard landscaping more noticeable from the street and would in its current form represent a downgrading of the proposed scheme. It is recommended that the boundary wall is retained existing so that this positive aspect of the previous scheme is maintained in the current application.</p> <p>Conservation still in principle supports this application, however the concerns over the roof plant and the boundary walls should be revisited to ensure that the scheme is not downgraded from its original application and that the proposals minimise any harm to the Highgate Conservation Area and the listed terrace.</p>	
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	<p>Comments dated 18/03/2025</p> <p>The revised plant area on the roof and the amendments to the boundary wall is welcomed and this overcomes the concerns raised, the viewpoints provided demonstrate that the plant to the roof in the proposed position would not be visible. Consequently, this proposal is now fully supported, subject to conditions to ensure the detailed design and materiality of the proposed development through to construction.</p> <ul style="list-style-type: none"> • Further details for the proposed materials <ul style="list-style-type: none"> ○ however this may need to be a non-withstanding condition, as some of the drawings have material specifications on them. ○ The further details of materials condition should include the external hard landscaping surfaces and a sample panel(s) of brickwork which demonstrates the proposed bricks, mortar and bonding pattern(s) to be viewed on site • Detailed landscaping design including boundary treatments & planting • Detail drawings of the proposed scale 1:10 or 1:20): <ul style="list-style-type: none"> a) privacy screens & balustrading b) Plant screening c) windows and doors d) decorative brickwork (scale of 1:10 or 1:5) <p>However, if the applicants are considering redesigning the landscape, rationalising the entrance layout to the flats on North Hill may be something they could consider now, rather than at AOD stage.</p>	
Transport	<p><u>Application proposal</u></p> <p>This application seeks to demolish the existing Mary Feilding Guild Care Home which closed during 2021 and construct a new care home and rehabilitation clinic with up to 50 beds, and rehabilitation facilities including a gym, physio room, hydro pool and consulting rooms. In addition to this facility a 9-unit residential component is included in the overall development. Associated car and cycle parking is included.</p> <p><u>Planning History</u></p> <p>The existing home accommodated 43 rooms and was closed as considered unviable by the current owners.</p>	<p>Observation s have been taken into account. The Recommend ed legal agreement clauses and conditions will be included in line with the planning obligations SPD</p>

	<p>Two previous applications have been consented for this site, for slightly larger and different proposals. These are HGY/2021/3481 (7 October 2022) and HGY/2022/4415 (14 February 2023).</p> <p>The extant permissions comprise a new care home of up to 70 beds (Class C2), together with a well-being and physiotherapy centre and associated facilities and services.</p> <p>This proposal, whilst including a residential component, is overall a slightly smaller proposal than those already consented.</p> <p><u>Location and access</u></p> <p>The site is located to the western side of North Hill, at the junction of North Hill with View Road (to the northern side of the junction). The site has frontages to both North Hill and View Road.</p> <p>The site has a PTAL value of 3, considered 'moderate' access to public transport services. 5 different bus services are accessible within 2 to 8 minutes walk of the site, and Highgate Underground Station is a 9-minute walk away.</p> <p>It is also located within the Highgate Outer CPZ, which has operating hours of 10.00 to 12.00 Monday to Friday.</p> <p>At present there are two vehicle crossovers/accesses off view Road and a long crossover off North Hill. There are parking spaces at the North Hill entrance and additional car parking is available within the site accessed from the crossovers off View Road.</p> <p><u>Development proposal and quantum</u></p> <p>Compared to the previously consented applications, this is both physically and in transportation terms a slightly smaller scale development.</p>	
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	<p>For the care home/rehabilitation component, there is a change in the type of operation proposed. The consented 70 bed development included 43 beds for long term palliative and dementia care, and 27 beds for rehabilitation, including well being and recuperation from surgery.</p> <p>This current proposal for a 50 bed facility is for the rehabilitation and post operative care only and not for the longer term and more intensive palliative and dementia care arrangements. The Transport Assessment details that 82 staff in total were required for the 70 bed arrangement, and 54 will be required for this revised proposal. Therefore, there will be a reduction of around a third in terms of staff numbers compared to the consented arrangements. The current proposals for rehabilitation care as opposed to a proportion of palliative and dementia care do require a lower ratio of staff per bed/patient and this is referenced within the TA.</p> <p>There are ten off street car parking spaces proposed for this part of the development, which includes two blue badge/disabled bays. An area for ambulances and delivery/service vehicles to park/dwell is also referenced. Cycle parking for 8 cycles is proposed for location within a secure store, the applicant intends for short term/visitor cycle parking to also be located within this store.</p> <p>In addition to the above 9 new residential units are proposed for a block facing North Hill, to include the following.</p> <ul style="list-style-type: none"> • 5 No. 1 bedroom units • 3 No. 2 bedroom units • 1 No. 3 bedroom unit. <p>Two off street car parking spaces (one blue badge) are proposed for these units, accessed off the existing highway access on the North Hill service road, and 16 cycle parking spaces, to be located externally within a secure, weatherproof store.</p> <p><u>Transportation considerations</u></p>	
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	<p>The following part of this response considers the transportation aspects of this application, with reference to the previously consented applications/proposals for this site.</p> <p><u>Access arrangements for all modes of transport</u></p> <p>The care home access will be off View Road, and the residential properties off North_Hill.</p> <p>It does not appear (nor is there any reference within the application documents) that any physical changes are proposed for the site accesses off the public highway. However, the existing crossover off the North Hill service road at the residential component is full width of the site and is not expected to be required at these dimensions for this development given the two parking space arrangement.</p> <p>For both accesses any physical or dimensional changes will need to be detailed, along with swept path plots if appropriate for manoeuvring onto or off of the public highway and within the site to access car parking spaces or drop off/pick up or service vehicle facility.</p> <p>Any changes to the physical accesses will necessitate entering into the appropriate Highways Act Agreement.</p> <p>Pedestrian and cycle access for the care home and rehabilitation centre will also be off View Road.</p> <p><u>Transportation demand and impacts</u></p> <p>Overall, it is noted that with a smaller care/rehabilitation facility, there are expected to be fewer trips and reduced overall transportation demands compared to the consented applications for the care home/rehabilitation component of the development.</p> <p><u>Trip generation</u></p> <p>A comprehensive trip generation is included within the Transportation Assessment. Details of staffing levels have also been provided, as commented earlier there will be fewer staff (54 in total) than the consented scheme from 2021. It is detailed the maximum staff on site will</p>	
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be 32 during 0730 – 0800. There will also be a lower number of visitors than previously considered for the consented scheme given the lower number of beds.

Details in the TA include the following.

- 100% bed occupancy assumed, two-week turnover on average (i.e. 10% turnover in terms of vehicle drop off/pick up on any day)
- Physio service for pre booked (no walk ups) up to 76 appointments a day, 0800 – 1830.
- 2 maintenance contractors on site at any time
- 4 wellness centre deliveries a day
- Delivery and service movements based on previous care home usage.
- A staff accumulation exercise is included which detailed maximum car parking demand based on census journey to work information with a car mode of 41%.
- Visitor trips to inpatients have been assumed at 32% as previously detailed, as in each patient on average has a visitor every three days. The peak number of visitors and car movements associated are between 1200 – 1300 and 1400 – 1500 with demand of 5 cars generated (assumption is all visitors visit using cars)
- For the 9 residential units, 9 inbound and 9 outbound vehicle trips a day are predicted.

A combined vehicular trip generation has been derived based on the above, and this has considered the vehicle trips referencing the updated current parking stress surveys carried out for this application (the results are discussed next in this response). This assessment has been based on the 6m long car iteration so a 'worst case' scenario.

Parking considerations

The care home will provide 10 off street spaces and 2 spaces are proposed for the 9 residential units. Two blue badge spaces are included within the 10 care home spaces and one of the two residential spaces. The applicant will need to ensure that London Plan requirements with respect to electric vehicle charging points is met and this will need to be conditioned.

	<p>The applicant has carried out a comprehensive parking stress survey for daytime periods as per the previously consented 2021 application. This has recorded some on street changes carried out by the Council since the last survey, which include the addition of new EV charging bays within the 500m walk distance, plus amendments to the level of Pay & Display parking available on Church Road, which has been reduced. The overall level of parking spaces has marginally increased from 242 to 251 bays within 200m due to revisions to crossovers and marked bays.</p> <p>The parking stress survey identified that stresses are of a similar pattern to the earlier surveys, high stresses in some streets and lower in others, with slight stress reductions compared to the previous application, but does identify there will be some parking overspill onto the surrounding streets resultant from this development.</p> <p>Whilst this proposal is essentially smaller this iteration has lower off-street parking given the removal of the basement parking from the proposals associated with high construction costs.</p> <p>The trip generation and parking demand/accumulation exercise referenced above has identified that during the period 1500 – 1600 the excess car parking demand needing to be accommodated on street from both components of the development is for 20 vehicles taking into account the 10 care home spaces and the 2 residential spaces. Assuming these demands will be primarily met on View Road, this would increase the recently surveyed daytime parking stresses within View Road. The TA reports this will result in parking stresses exceeding the normal 85% threshold with all spaces occupied, beyond which parking issues can be expected to occur, such as inappropriate parking and migration to adjacent streets. This occurs during the 0800 – 0900 and 1500 – 1600 periods only.</p> <p>Survey area wide, there are slight increases for the 200m walk distance comparing the consented and currently proposed developments, however it is noted that the 85% threshold for the survey area is only exceeded (87%) during the 0800 – 0900 period.</p> <p>Considering the existing parking conditions, and comparing the predictions for the two development scenarios, there are very slight increases in the survey area stresses predicted</p>	
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for the current application. It is of course taken on board though that these calculations are predicated on a 6m car length so it is not expected that the actual resultant stresses will be as predicted. Nonetheless, it is still the case that the applicant will need to make a financial contribution via S106 to fund the refinement of waiting and loading restrictions to help manage these additional pressures on street at the busiest times. It is understood the applicant is amenable to this.

Parking mitigation

The cumulative impact of this development and existing parking demand being at capacity or near capacity, will likely result in residents and visitors to the development seeking to park on yellow and double yellow lines, and within adjacent streets, which will impact on highways safety and flow of traffic on the highways network.

The TA has identified additional in street parking demands for 20 or so vehicles at the busiest times and View Road does experience quite high parking demands at present. There are a number of streets adjacent to this site that also already experience high parking stresses.

Refinements and alterations to on street waiting and loading arrangements are appropriate to manage the expected impacts and very importantly, these should be able to be implemented on the following streets: potential overflows of parking *Storey Road, North Hill, Church Road, Talbot Road*), where parking is forecasted due to the cumulative impact of this development and existing parking demand to be at capacity or near capacity and resident may seek to park on yellow and double yellow lines which will impact on highways safety and flow of traffic on the highways network.

Additional Parking Management Measures are required on:

North Hill Avenue, the potential of overspill resulting in parking on double yellow lines change to double yellow lines with blips, (possible red route)

North Hill Junction with North Hill Avenue, single and double lines, change to double yellow lines with blips (possible red route). North Hill possible blocking and change single yellow lines to double yellow lines.

Storey Road implement blips on double yellow lines no waiting at any time.

	<p>Church Road parking review post implementation a possible change of single yellow lines to double yellow with blips at junctions with Grange Road</p> <p>Review of parking restriction junction of junction Broad Lands Road / Broadlands Close with Grange Road, potential for additional double yellow lines.</p> <p>It is be noted that whilst there are currently high car parking pressures on some roads the overall parking pressures within the surveyed area has been assessed on the worst-case scenario. The contribution of £20,000 previously secured as part of the Planning application HGY/2021/3481 still appropriate and supported by the applicant is required for parking management measures, to address potential overflows of parking causing road safety concerns in the surrounding area from additional parking demands generated by the development.</p> <p>and with the measures secured as part of the S.106/S.278 agreement the scheme is acceptable.</p> <p><u>Active Travel Zone assessment and accident history review</u></p> <p>The applicant has included within their TA an ATZ assessment that has examined five routes to and from the development that can be used by both residential occupiers of the new dwellings plus visitors to the care home. This has identified similar issues with all routes, primarily relating to highway maintenance issues such as cutting back of vegetation/bushes and trees, footway paving maintenance and general removal of clutter where appropriate. There are also references to suggesting improvements to street lighting.</p> <p>It is acknowledged that there are no immediately appropriate measures arising from this assessment that are required to make this development acceptable and that they relate primarily to longer term highway maintenance issues.</p> <p>With regards historical accident data, the applicant has provided a review of all KSI accidents within the locality, and there are no patterns or issues arising from this data that are attributable to accessing this site. The 5 clusters identified are all along the A1 and improvements would be under the remit of TfL.</p>	
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Cycle parking arrangements

The applicant is proposing 8 long stay spaces for the care home, and 16 for the residential units. Considering London Plan numerical requirements, for the care home there should be 1 space per 5 FTE members of staff, and 1 visitor space for every 20 beds.

It is not detailed how many FTE staff there will be, however it is noted that the maximum staff attendance will be 32, so 7 long term spaces is appropriate. With 50 beds 3 short stay spaces are required. Cycle parking is proposed for an external cycle store located adjacent to the car parking area.

For the residential units, 15 long stay and 2 short stay cycle parking spaces are required. 16 spaces are proposed, shown indicatively in the rear garden area. There does not appear to be any visitor cycle parking displayed.

The full dimensional arrangements and layouts have not been provided within the application documents, the applicant will need to provide full dimensional details to demonstrate how London Plan numerical requirements for long and short stay cycle parking will be provided, and how the proposed arrangements will meet TfL's London Cycle Design Standards. This can be covered by a pre commencement condition.

Waste and recycling storage and collection arrangements

Bin stores are shown adjacent to the car parking area for the care home, and a rear garden store shown indicatively for the residential units. The applicant will need to ensure all waste and recycling storage and collection arrangements meet Haringey's standards. Pull distances appear to be satisfactory.

A Swept path for a collecting refuse vehicle has been included in the TA appendices, and this appears fine, however any parked ambulance or delivery/service vehicle in the designated informal area may block exit. This needs to be clarified as to the arrangements and likelihood of this happening within a Delivery and Servicing Plan.

	<p>There is some commentary on commercial waste management arrangements in the TA, detailing private contractors will be used but no details on the frequency or vehicle sizes/waiting and dwell locations.</p> <p>Collections from the North Hill service road, as per the adjacent properties will be carried out for the residential units.</p> <p><u>Delivery and servicing arrangements</u></p> <p>For the care home the TA details all waiting/visiting delivery and service vehicles will do so off of the highway. Some commentary on waste and recycling arrangements is above.</p> <p>Overall a detailed Delivery and Servicing Plan is required to demonstrate how all delivery and servicing activity for the care home will be managed and accommodated off of the highway, including clarity on the numbers and durations of visits, the vehicle sizes and management arrangements for visiting vehicles when considering ongoing use of the off street parking spaces. This DSP should be provided for review and approval prior to commencement of the construction works to ensure arrangements are acceptable.</p> <p><u>Travel planning</u></p> <p>A Travel Plan should be implemented for the care/rehabilitation home component of this application. The Travel Plan should ensure that the development proposal encourages travel by sustainable modes of transport to and from the development and is in line with the Councils Local Plan Policies SP1, SP4 and SP7.</p> <p>Provision of a Travel Plan can be covered by the S106 and a Travel Plan monitoring fee will be required.</p> <p><u>Construction phase</u></p> <p>A comprehensive Demolition and Construction Logistics Plan will be required for this development, detailing the duration of the build and how it will be carried out with respect to access and potential impacts on the highway and adjacent neighbours.</p>	
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	<p>The applicant will need to detail how impacts on the public highway and adjacent neighbours will be minimised and managed, and it is strongly recommended the applicant engages with Haringey's Network Management officers to discuss and agree any temporary measures, routing to and from the site, and especially with regards to Highgate Primary school which is close by to the site.</p> <p>This document will need to outline the construction period and programme, and the numbers and types of construction vehicles attending the site. All arrangements to minimise the impact on both the Public Highway and adjacent neighbours will need to be included in this document. This will include deliveries and collections being made outside of the peak AM and PM periods and school start/finish times. The applicant will need to liaise with the Highways Team (Network Management Officers) to arrive at the optimum arrangements for construction access and any temporary arrangements on the highway or parking courts within the estate and these details should inform the detailed draft.</p> <p>Monies to cover officer time oversight and monitoring build out of the development will be required as well, for Network Management and Highways officers to ensure any temporary arrangements on the highway are appropriately managed and that highway safety and smooth operation of the network is maintained. This must be secured by the S.106 legal agreement.</p> <p><u>Conclusion</u></p> <p>Overall, this is a slightly smaller proposal, and the transportation impacts are very similar with only slight differences. There is reduced trip generation, and similar car parking impacts. With the provision of S106 to enable parking mitigation measures, along with a travel plan, and CPZ permit free status for the care home and any staff, along with a number of conditions relating to cycle parking details, deliveries and servicing arrangements, and a Demolition and Construction Management Plan, this application can be supported by Transportation.</p> <p><u>Recommendation</u></p>	
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There are no highway objections to this proposal subject to the following conditions, S.106 and S.278 obligations.

Conditions

1. Cycle Parking

The applicant will be required to submit plans showing accessible; sheltered, and secure cycle parking 8 for the commercial element of the proposal and 16 residential car 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 Cycle, and London Cycle Design Standards (LCDS).

2. 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.

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

The final DSP must be submitted at least 6 months before the site is occupied and must be reviewed annually in line with the travel plan for a period of 3 years unless otherwise agreed by the highway's authority.

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

3. Electric Vehicle Charging

Subject to a condition requiring the provision of 2 active and 2 passive electric vehicle charging points to serve the on-site parking spaces from the onset.

	<p>Reason: to be in accordance with published Haringey Council Development Management DPD, Chapter 5 Transport & Parking and the published London Plan 2021 Policy T6.2 Office Parking.</p> <p><u>5. Disabled parking bays</u></p> <p>The applicant will be required to submit and provide plans demonstrating how employees who require a wheelchair accessible car parking spaces will be provided with one from the onset; this must be submitted for approval before any development commences on site.</p> <p>REASON: to ensure the development is in accordance with the published London Plan 2021 T6.5 Non-residential disabled person parking.</p> <p><u>6. Car Parking Management Plan</u></p> <p>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.</p> <p>S106 Obligations</p> <p><u>1. Construction Logistics Plan</u></p> <p>The applicant/developer is required to submit a Construction Logistics and Management Plan, 6 months (six months) prior to the commencement of development, and works cannot commence until this is approved in writing by the local planning authority.</p> <p>The applicant will be required to contribute, by way of a Section 106 agreement, a sum of £5,000 (five thousand pounds) to cover officer time required to administer and oversee the 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 and means of slot booking to avoid vehicles waiting on the highway and avoid the AM and PM peaks c) Estimates for the number and type of parking suspensions that will be required. 	
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	<p>d) Details of measures to protect pedestrians and other highway users from construction activities on the highway.</p> <p>e) The undertaking of a highways condition survey before and after completion.</p> <p>f) The implementation and use of the Construction Logistics and Community Safety (CLOCS) standard.</p> <p>g) The applicant will be required to contact LBH Highways to agree pre commencement condition surveys.</p> <p>h) Site logistics layout plan, including parking suspensions, turning movements, and closure of footways.</p> <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 locality 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><u>2. Commercial Travel Plan</u></p> <p>A commercial travel plan must be secured for each unit by way of a 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 per unit, £10,000 (ten thousand pounds) for monitoring of the travel plan for a period of 5 years. This must be secured by S.106 agreement.</p>	
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- e) The first surveys should be completed 6 months post occupation or on 50% occupation whichever is sooner.

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

3. Parking Management contribution

The applicant will be required to contribute £20,000 towards parking management measures in the local area to deal with potential overspill or parking outside the CPZ operational hours on Storey Road, North Hill, Church Road, Talbot Road and other roads within the local area.

Reason to mitigate the impact of the development proposal on the local highway network through the implementation of parking management measures.

4. Car-capped Agreement

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

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

5. Highway Improvements

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, and improved pedestrian infrastructure. The developer will be required to provide details of any temporary highways including temporary TMO's required to enable the occupation of each phase of the development, which will have to be costed and

	<p>implemented independently of the main S.278 works. The works include but are not limited to:</p> <ol style="list-style-type: none"> 1) The strengthening of the site's vehicle crossover to allow for an increase in heavy vehicle movements. 2) Reconstruction of existing crossover at North Hill at the former access to footways. 3) Reconstruction of footways nearby to the site to mitigate deterioration caused by the development, 4) Resurfacing of the carriageway outside of the site to ensure that the road network can support the increase in trips. <p>Although the highway access is not proposed for any physical changes the applicant may well need to carryout works to remedy any construction related damage to the public highway relating to the demolition/construction and build out/fit out of the development.</p> <p>Reason: to improve accessibility to the site by foot and to ensure that the site is in accordance with the London Plan 2021 Policy T2 Healthy Streets and to implement highway works to facilitate future access to the development site.</p>	
Lead Pollution	<p>Having considered the relevant applicant submitted information including: Energy Statement prepared by Hodkinson Consultancy and taken note of the proposal to install air source heat pumps and solar photovoltaics; Air Quality Assessment with reference J10/13064C/10/1/F2 prepared by Air Quality Consultants Ltd, dated 27th June 2024 and taken 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), 10 (Conclusions); Landscape General Arrangement prepared by Guarda Landscape, dated December 2022, please be advised that we have no objections 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>Comments noted. Conditions /informative included</p>

1. Land Contamination

Before development commences other than for investigative work:

- a) A desktop study shall be carried out which shall include the identification of previous uses, potential contaminants that might be expected, given those uses, and other relevant information. Using this information, a diagrammatical representation (Conceptual Model) for the site of all potential contaminant sources, pathways and receptors shall be produced. The desktop study and Conceptual Model shall be submitted to the Local Planning Authority. If the desktop study and Conceptual Model indicate no risk of harm, development shall not commence until the desktop study has been approved in writing by the Local Planning Authority.
- b) If the desktop study and Conceptual Model indicate any risk of harm, a site investigation shall be designed for the site, using information obtained from the desktop study and Conceptual Model. The investigation must be comprehensive enough to enable: an updated risk assessment to be undertaken, refinement of the Conceptual Model, and the development of a Method Statement Detailing the remediation requirements. The updated risk assessment and refined Conceptual Model along with the site investigation report, shall be submitted and approved in writing by the Local Planning Authority.
- c) If the updated risk assessment and refined Conceptual Model indicate any risk of harm, a Method Statement detailing the remediation requirements and any post remedial monitoring, using the information obtained from the site investigation, shall be submitted to, and approved in writing by, the Local Planning Authority prior to that remediation being carried out on site. The remediation strategy shall then be implemented as approved.
- d) Before the development is occupied and where remediation is required, a verification report demonstrating that all works detailed in the remediation method statement have been completed shall be submitted to and approved in writing by the Local Planning Authority.

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

2 Unexpected Contamination

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

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

	<p>3. NRMM</p> <p>a) Prior to the commencement of the development, evidence of site registration at http://nrmm.london/ to allow continuing details of Non-Road Mobile Machinery (NRMM) and plant of net power between 37kW and 560 kW to be uploaded during the construction phase of the development shall be submitted to and approved by the Local Planning Authority.</p> <p>b) Evidence that all plant and machinery to be used during the demolition and construction phases of the development shall meets Stage IIIA of EU Directive 97/68/ EC for both NOx and PM emissions shall be submitted to the Local Planning Authority.</p> <p>c) During the course of the demolitions, site preparation and construction phases, an inventory and emissions records for all Non-Road Mobile Machinery (NRMM) shall be kept on site. The inventory shall demonstrate that all NRMM is regularly serviced and detail proof of emission limits for all equipment. All documentation shall be made available for inspection by Local Authority officers at all times until the completion of the development.</p> <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 Management and Control of Dust</p> <p>No works shall be carried out on the site until a detailed Air Quality and Dust Management Plan (AQDMP), detailing the management of demolition and construction dust, has been submitted and approved in writing by the LPA. The plan shall be in accordance with the GLA SPG Dust and Emissions Control and shall also include a Dust Risk Assessment. The works shall be carried out in accordance with the approved details thereafter.</p> <p>Reasons: To Comply with Policy 7.14 of the London Plan and GLA SPG Dust and Emissions Control (2014).</p> <p>5. Considerate Constructors Scheme</p> <p>Prior to the commencement of any works the site or Contractor Company must register with the Considerate Constructors Scheme. Proof of registration must be submitted to and approved in writing by the Local Planning Authority. Registration shall be maintained throughout construction.</p> <p>Reason: To Comply with Policy 7.14 of the London Plan.</p> <p>Informative:</p> <p>1. Prior to refurbishment or any construction work of the existing buildings, an asbestos survey should be carried out to identify the location and type of asbestos containing materials. Any asbestos containing materials must be removed and disposed of in accordance with the correct procedure prior to any demolition or construction works carried out.</p>	
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Carbon Team	<p>Carbon Management Response 07/03/2024</p> <p>In preparing this consultation response, we have reviewed:</p> <ul style="list-style-type: none"> • Energy Statement prepared by Hodkinson (dated Nov 2024) • Overheating Report prepared by Harniss (dated June 2024) • Whole Life Cycle Carbon Assessment prepared by Hodkinson (dated June 2024) • Relevant supporting documents. <p>Summary</p> <p>The development achieves a reduction of 43.3% carbon dioxide emissions on site, which is supported in principle. However, the submitted overheating strategy does not provide details of the overheating measures recommended to mitigate the overheating risks of the development and how passive measures has been maximised in line with the London Plan's cooling hierarchy.</p> <p>Furthermore, the submitted Biodiversity Net Gain statement shows, there is a net loss rather than a gain which is not policy compliant. For compliance, the applicant is required to firstly, explore options to enhance the biodiversity on-site and only after on-site measures has been maximised, applicant to secure off-site credits.</p> <p>Some clarifications must be provided with regard to the Overheating Strategy and Biodiversity Net Gain Plan. Planning conditions have been recommended to secure the benefits of the scheme.</p> <p>Energy Strategy</p> <p>Policy SP4 of the Local Plan Strategic Policies, requires all new development to be zero carbon (i.e. a 100% improvement beyond Part L 2021). The London Plan (2021) further confirms this in Policy SI2.</p> <p>The overall predicted reduction in CO₂ emissions for the development shows an improvement of approximately 47.3% in carbon emissions with SAP10.2 carbon factors, from the Baseline development model (which is Part L 2021 compliant). This represents an annual saving of approximately 13.9 tonnes of CO₂ from a baseline of 29.4 tCO₂/year.</p>	<p>Comments noted. Conditions and legal agreement Clauses included</p>
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London Plan Policy SI2 requires major development proposals to calculate and minimise unregulated carbon emissions, not covered by Building Regulations. The calculated unregulated emissions are: 26.7 tCO₂.

<i>Site-wide (SAP10.2 emission factors)</i>			
	Total regulated emissions (Tonnes CO₂ / year)	CO₂ savings (Tonnes CO₂ / year)	Percentage savings (%)
Part L 2021 baseline	29.4		
Be Lean	24.1	5.3	18%
Be Clean	21.9	2.2	7.5%
Be Green	15.5	6.4	21.8%
Cumulative savings		13.9	47.3%
Carbon shortfall to offset (tCO₂)	15.5		
Carbon offset contribution	£95 x 30 years x 15.5 tCO ₂ /year = £44,175		
10% management fee	£4,417.50		

	Residential			Non-Residential		
	Total regulated emissions (Tonnes CO₂ / year)	CO₂ savings (Tonnes CO₂ / year)	Percentage savings (%)	Total regulated emissions (Tonnes CO₂ / year)	CO₂ savings (Tonnes CO₂ / year)	Percentage savings (%)
Baseline	10.5			18.9		

Be Lean	8.8	1.7	16.2%	15.3	3.6	19%
Be Clean	8.8	0.0	0%	13.1	2.2	11.6%
Be Green	3.3	5.5	52.4%	12.2	0.9	4.8%
Cumulative savings		7.2	68.6%		6.7	35.4%
Carbon shortfall to offset (tCO₂)	3.3			12.2		

Actions:

- Please submit the GLA's Carbon Emission Reporting Spreadsheet.

Energy Use Intensity (EUI) / Space Heating Demand (SHD)

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

	Proposed Development		GLA Benchmark
Building type	Residential	Rehabilitation Clinic	Residential/School/Office/Hotel/All other non-residential
EUI	TBC	TBC	Meets/Does not meet GLA benchmark of 35/65/55 kWh/m ² /year
SHD	TBC	TBC	Meets/Does not meet GLA benchmark of 15 kWh/m ² /year
Methodology used	TBC	TBC	

Actions:

- What is the calculated Energy Use Intensity (excluding renewable energy)? How does this perform against GLA benchmarks? Please submit the information in line with the GLA's reporting template.
- What is the calculated space heating demand? How does this perform against the GLA benchmark of 15 kWh/m²/year? Please submit the information in line with the GLA's reporting template.

Energy – Lean

The applicant has proposed a saving of 5.3 tCO₂ in carbon emissions (18%) 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.

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

Building Parameters	Residential	Rehabilitation Clinic
Floor u-value	0.10 W/m ² K (ground), 0.14 W/m ² K (above exposed floor), & 0.12 W/m ² K (above unheated space)	0.10 W/m ² K (ground),
External wall u-value	0.16 W/m ² K	0.21 W/m ² K
Roof u-value	0.10 W/m ² K (Flat) & 0.14 W/m ² K (terrace roof)	0.12 W/m ² K (Pitched and flat roof)
Door u-value	1.60 W/m ² K	
Window u-value	0.85 W/m ² K	1.3 W/m ² K (soft low E coating, G-values of 0.21, 0.28 & 0.32 and light transmittance of 0.60)
G-value	0.32	
Air permeability rate	3 m ³ /hm ² @ 50Pa	
Ventilation strategy	Mechanical ventilation with heat recovery (MVHR 87-89% efficiency; 0.51 to 0.58 W/l/s Specific Fan Power)	Naturally ventilated with intermittent extract fans for the wet rooms as ensuite (0.2 W/l/s, WCs, and 0.50 W/l/s for laundry and changing rooms.

Thermal bridging	Accredited Construction Details	
Low energy lighting	100%	All 110 lamp lumens per circuit-watt
Heating system (efficiency / emitter)	89.50%	ASHP with COP of 2.64 (heating) and COP of 2.86 (hot water)
Thermal mass	Low/Medium	

Overheating is dealt with in more detail below.

Energy – Clean

London Plan Policy SI3 calls for major development in Heat Network Priority Areas to have a communal low-temperature heating system, with the heat source selected from a hierarchy of options (with connecting to a local existing or planned heat network at the top). Policy DM22 of the Development Management Document supports proposals that contribute to the provision and use of Decentralised Energy Network (DEN) infrastructure. It requires developments incorporating site-wide communal energy systems to examine opportunities to extend these systems beyond the site boundary to supply energy to neighbouring existing and planned future developments. It requires developments to prioritise connection to existing or planned future DENs.

The applicant is not proposing any Be Clean measures. The site is not within reasonable distance of a proposed Decentralised Energy Network (DEN).

Energy – Green

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

The application has reviewed the installation of various renewable technologies. The report concludes that air source heat pumps (ASHPs) and solar photovoltaic (PV) panels are the most viable options to deliver the Be Green requirement. A total of 6.4 tCO₂ (21.8%) reduction of emissions are proposed under Be Green measures.

(See the green boxes in above roof plan). Please provide some commentary on how the available roof space has been maximised to install solar PV.

- A living roof should be installed under the solar PV, or if this is not feasible, the roof should be light coloured to reduce solar heat gains and the improve efficiency of the solar panels.

Energy – Be Seen

London Plan Policy SI2 requests all developments to ‘be seen’, to monitor, verify and report on energy performance. The GLA requires all major development proposals to report on their modelled and measured operational energy performance. This will improve transparency on energy usage on sites, reduce the performance gap between modelled and measured energy use, and provide the applicant, building managers and occupants clarity on the performance of the building, equipment and renewable energy technologies.

The applicant should install metering equipment on site, with sub-metering by dwelling and non-residential unit. A public display of energy usage and generation should also be provided in the main entrance area to raise awareness of residents/businesses.

- Please confirm that sub-metering will be implemented for residential and commercial units.
- What are the unregulated emissions and proposed demand-side response to reducing energy: smart grids, smart meters, battery storage?
- Demonstrate that the planning stage energy performance data has been submitted to the GLA webform for this development: (<https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance/be-seen-energy-monitoring-guidance/be-seen-planning-stage-webform>)

Carbon Offset Contribution

A carbon shortfall of 15.5 tCO₂/year remains. The remaining carbon emissions will need to be offset at £95/tCO₂ over 30 years.

Overheating

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

In accordance with the Energy Assessment Guidance, the applicant has undertaken a dynamic thermal modelling assessment in line with CIBSE TM59 with TM49 weather files under London Weather Centre files.

Some areas in the site which are within close vicinity of the roads North Hill & View Road will be required to be modelled with the TM59 criteria for predominantly mechanically ventilated dwellings (assuming windows need to remain closed).

Results are listed in the table below.

Domestic: CIBSE TM59	Predominantly naturally ventilated		Predominantly mechanically ventilated	Number of corridors pass
	Criterion A (<3% hours)	Criterion B for bedrooms (less than 33 hours)	Number of habitable rooms pass (<3% hours)	
Care Home – Category I				
DSY1 2020s	100%	100%	100%	100%
Apartments – Category II				
DSY1 2020s	100%	100%	100%	100%
DSY2 2020s	Not Modelled	Not Modelled	Not Modelled	Not Modelled
DSY3 2020s	Not Modelled	Not Modelled	Not Modelled	Not Modelled
DSY1 2050s	Not Modelled	Not Modelled	Not Modelled	Not Modelled
DSY1 2080s	Not Modelled	Not Modelled	Not Modelled	Not Modelled

All spaces in the proposed Care Home and Apartments pass the overheating requirements for 2020s DSY1. In order to pass this, the following measures will be built:

- Natural ventilation unless restricted by noise issues
- Improved Glazing g-value of 0.21, 0.28 and 0.32
- MVHR with enhanced flow rates from 30l/s to 45l/s
- Cooling system – highly efficient low carbon outdoor units with a fan coil unit to each room

	Non-domestic: CIBSE TM52	Number of habitable spaces that pass at least 2 out of 3 criteria 1: hours of exceedance 2: daily weighted exceedance 3: upper limit temperature	
	DSY1 2020s	100%	
	DSY2 2020s	Not Modelled	
	DSY3 2020s	Not Modelled	
	DSY1 2050s	Not Modelled	
	DSY1 2080s	Not Modelled	
	<p>All commercial and office spaces pass the overheating requirements for 2020s DSY1. In order to pass this, the following measures will be built:</p> <ul style="list-style-type: none">- Natural ventilation, with openable areas of 0.8 and opening angle of °- Improved Glazing g-value of 0.21.- MVHR with enhanced flow rates – 4ach- Cooling system <p>No future mitigation measure proposed.</p> <p>The submitted overheating strategy is not considered acceptable.</p> <p><u>Actions:</u></p> <ul style="list-style-type: none">- Modelling of DSY1 2020s weather file:<ul style="list-style-type: none">o with openable windows demonstrating how the rooms will not overheat to demonstrate that passive measures have been maximised in line with the cooling hierarchy.o with closed windows demonstrating how the rooms that are constrained by noise will not overheat, with appropriate overheating mitigation measures in line with Approved Document O.- Undertake further modelling:<ul style="list-style-type: none">o Model the 2020s DSY 2 and 3 and DSY1 for the 2050s and 2080s. Ensure the design has incorporated as many mitigation measures to pass these more extreme and future weather files as far as feasible. Any remaining overheating risk should inform the future retrofit plan.o All single-aspect rooms facing west, east, and south;o At least 50% of rooms on the top floor;		

	<ul style="list-style-type: none"> ○ 75% of all modelled rooms facing South or South/West; ○ Rooms closest to any significant noise and / or air pollution source, with windows closed at all times (with cross reference to the Noise and the Air Quality Assessments to demonstrate the most sensitive receptors and the AVO Residential Design Guide); ○ Habitable communal spaces (e.g. communal living/dining rooms in care homes); ○ Communal corridors, where pipework runs through; <ul style="list-style-type: none"> - Specify the shading strategy, including: technical specification and images of the proposed shading feature (e.g. overhangs, Brise Soleil, external shutters), elevations and sections showing where these measures are proposed. - 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. - Specify the active cooling demand (space cooling, not energy used) on an area-weighted average in MJ/m² and MY/year? Please also confirm the efficiency of the equipment, whether the air is sourced from the coolest point / any renewable sources. - The applicant must demonstrate that the risk of overheating has been reduced as far as practical and that all passive measures have been explored, including reduced glazing and increased external shading. The applicant should also outline a strategy for residents to cope in extreme weather events, e.g. use of fans. - Set out a retrofit plan for future and more extreme weather files, demonstrating how these measures can be installed, how they would reduce the overheating risk, what their lifecycle replacement will be, and who will be responsible for overheating risk. - Demonstrate how the future mitigation measures will improve the overheating results. - Identify communal spaces (indoor and outdoor) where residents can cool down if their flats are overheating. - Confirm who will own the overheating risk when the building is occupied (not the residents). - This development should have a heatwave plan / building user guide to mitigate overheating risk for occupants. <p>Sustainability</p> <p>Policy DM21 of the Development Management Document requires developments to demonstrate sustainable design, layout and construction techniques. The sustainability section in the report sets out the proposed measures to improve the sustainability of the scheme, including energy and carbon reduction, water reduction, waste management, circular economy, materials, pollution, flood</p>	
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risk and surface water run-off, building quality, transport and local amenities, biodiversity and ecology, sustainable construction and aftercare.

Non-Domestic BREEAM Requirement

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

The applicant has also prepared a BREEAM Pre-Assessment Report for the commercial units. Based on this report, a score of 63.88 % is expected to be achieved, equivalent to 'Very Good' rating.

Actions:

- A table should be submitted to demonstrate which credits will be met, how many are met out of the total available, under which category, which could be achieved, and which will not be met. This needs to include justification where targets are not met or 'potential' credits (where they are available under the Shell and Core assessment). This will enable better assessment of which credits.

Urban Greening / Biodiversity

All development sites must incorporate urban greening within their fundamental design and submit an Urban Greening Factor Statement, in line with London Plan Policy G5. London Plan Policy G6 and Local Plan Policy DM21 require proposals to manage impacts on biodiversity and aim to secure a biodiversity net gain. Additional greening should be provided through high-quality, durable measures that contribute to London's biodiversity and mitigate the urban heat island impact. This should include tree planting, shrubs, hedges, living roofs, and urban food growing. Specifically, living roofs and walls are encouraged in the London Plan. Amongst other benefits, these will increase biodiversity and reduce surface water runoff.

The Biodiversity Net Gain calculation shows a net loss of -20.75%, which is below the 10% requirement as set out in the Environment Act 2021. This is not policy compliant. In order to be policy compliant, the applicant is required to firstly, explore options to enhance the biodiversity on-site and only after on-site measures has been maximised, applicant to secure off-site credits. To secure this a biodiversity net gain plan has been conditioned.

The urban greening factor is 0.30.

Living roofs

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

The applicant proposes 129.4m² of green roof which is supported. All landscaping proposals and living roofs should stimulate a variety of planting species. Mat-based, sedum systems are discouraged as they retain less rainfall and deliver limited biodiversity advantages. The growing medium for extensive roofs must be 120-150mm deep, and at least 250mm deep for intensive roofs (these are often roof-level amenity spaces) to ensure most plant species can establish and thrive and can withstand periods of drought. Living walls should be rooted in the ground with sufficient substrate depth.

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

Whole Life-Cycle Carbon Assessments

Policy SI2 requires developments referable to the Mayor of London to submit a Whole Life-Cycle Carbon Assessment and demonstrate actions undertaken to reduce life-cycle emissions.

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

	Estimated carbon emissions	GLA benchmark	Embodied carbon rating (Industry-wide)
Product & Construction Stages Modules A1-A5 (excl. sequestration)	525kgCO ₂ e/m ²	Meets GLA benchmark (<850 kgCO ₂ e/m ²) but misses the aspirational target (<500 kgCO ₂ e/m ²).	Modules A1-A5 achieve a band rating of 'D', not meeting the LETI 2020 Design Target.
Use and End-Of-Life Stages	302kgCO ₂ e/m ²	Meets GLA target (<350 kgCO ₂ e/m ²) and almost meets the aspirational	

Modules B-C (excl. B6 and B7)		benchmark (<300 kgCO ₂ e/m ²).	
Modules A-C (excl B6, B7 and incl. sequestration)	796kgCO ₂ e/m ²	Meets GLA target (<1200 kgCO ₂ e/m ²) and the aspirational benchmark (<800 kgCO ₂ e/m ²).	Modules A1-B5, C1-4 (incl sequestration) achieve a letter band rating of 'C', not meeting the LETI2020 Design Target.
Use and End-Of-Life Stages Modules B6 and B7	1579kgCO ₂ e/m ²	N/A	
Reuse, Recovery, Recycling Stages Module D	-185kgCO ₂ e/m ²	N/A	

It is recommended to incorporate the measures recommended as high-level opportunities by the report to further reduce carbon emissions post planning.

Planning Conditions

To be secured with amendments expected to the wording below once the revised information has been submitted.

Energy strategy

The development hereby approved shall be constructed in accordance with the Energy Statement prepared by Hodkinson (dated Nov 2024) delivering a minimum 43.3% improvement on carbon emissions over 2021 Building Regulations Part L, with high fabric efficiencies, INDIVIDUAL air source heat pumps for apartments, communal air source heat pump for rehabilitation clinic, and a minimum 25kWp solar photovoltaic (PV) array.

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

- Confirmation of how this development will meet the zero-carbon policy requirement in line with the Energy Hierarchy;

	<ul style="list-style-type: none"> - Confirmation of the necessary fabric efficiencies to achieve a minimum 18% reduction; - Details to reduce thermal bridging [majors only]; - Location, specification and efficiency of the proposed ASHPs (Coefficient of Performance, Seasonal Coefficient of Performance, and the Seasonal Performance Factor), with plans showing the ASHP pipework and noise and visual mitigation measures; - Specification and efficiency of the proposed Mechanical Ventilation and Heat Recovery (MVHR), with plans showing the rigid MVHR ducting and location of the unit; - Details of the PV, demonstrating the roof area has been maximised, with the following details: a roof plan; the number, angle, orientation, type, and efficiency level of the PVs; how overheating of the panels will be minimised; their peak output (kWp) and annual energy generation (kWh/year); 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 <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 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>	
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BREEAM Certificate

- a) *Prior to commencement on site for the relevant non-residential unit, a Design Stage Assessment and evidence that the relevant information has been submitted to the BRE for a design stage accreditation certificate must be submitted to the Local Planning Authority confirming that the development will achieve a BREEAM "Very Good" outcome (or equivalent), aiming for "Excellent". This should be accompanied by a tracker demonstrating which credits are being targeted, and why other credits cannot be met on site.*
- b) *Within 6 months of commencement on site, the Design Stage Accreditation Certificate must be submitted. The development shall then be constructed in strict accordance with the details so approved, shall achieve the agreed rating and shall be maintained as such thereafter for the lifetime of the development.*
- c) *Prior to occupation, the Post-Construction Stage Assessment and tool, and evidence that this has been submitted to BRE should be submitted for approval, confirming that the development has achieved a BREEAM "Very Good" outcome (or equivalent), aiming for "Excellent", subject to certification by BRE.*
- d) *Within 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.*

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

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

Living roofs

- a) *Prior to the above ground commencement of development, details of the living roofs must be submitted to and approved in writing by the Local Planning Authority. Living roofs must be planted with flowering species that provide amenity and biodiversity value at different times of year. Plants*

must be grown and sourced from the UK and all soils and compost used must be peat-free, to reduce the impact on climate change. The submission shall include:

- i) A roof plan identifying where the living roofs will be located;*
- ii) A section demonstrating settled substrate levels of no less than 120mm for extensive living roofs (varying depths of 120-180mm), and no less than 250mm for intensive living roofs (including planters on amenity roof terraces);*
- iii) Roof plans annotating details of the substrate: showing at least two substrate types across the roofs, annotating contours of the varying depths of substrate*
- iv) Details of the proposed type of invertebrate habitat structures with a minimum of one feature per 30m² of living roof: substrate mounds and 0.5m high sandy piles in areas with the greatest structural support to provide a variation in habitat; semi-buried log piles / flat stones for invertebrates with a minimum footprint of 1m², rope coils, pebble mounds of water trays;*
- v) Details on the range and seed spread of native species of (wild)flowers and herbs (minimum 10g/m²) and density of plug plants planted (minimum 20/m² with root ball of plugs 25cm³) to benefit native wildlife, suitable for the amount of direct sunshine/shading of the different living roof spaces. The living roofs will not rely on one species of plant life such as Sedum (which are not native);*
- vi) Roof plans and sections showing the relationship between the living roof areas and photovoltaic array; and*
- vii) Management and maintenance plan, including frequency of watering arrangements.*
- viii) A section showing the build-up of the blue roofs and confirmation of the water attenuation properties, and feasibility of collecting the rainwater and using this on site;*

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

Reason: To ensure that the development provides the maximum provision towards the creation of habitats for biodiversity and supports the water retention on site during rainfall. In accordance with London Plan (2021) Policies G1, G5, G6, SI1 and SI2 and Local Plan (2017) Policies SP4, SP5, SP11 and SP13.

Whole Life Carbon

The development hereby approved shall be constructed in accordance with the Whole Life Cycle Carbon Emissions Assessment prepared by Hodkinson (dated June 2024).

Prior to the commencement of the development, excluding demolition, an update to the approved Whole Life-Cycle Carbon assessment to reaffirm the proposed strategy or demonstrate improvements, shall be submitted to and approved in writing by the Local Planning Authority, demonstrating that the Whole Life-Cycle Carbon emissions savings of the development achieve at least the GLA's Standard Benchmark and setting out further opportunities to achieve the GLA's Aspirational Benchmark set out in the GLA's Whole Life-Cycle Assessment Guidance.

The assessment should include details of measures to reduce carbon emissions throughout the whole life-cycle of the development and provide calculations in line with the Mayor of London's guidance on Whole Life-Cycle Carbon Assessments, and the development shall be carried out in accordance with the approved details and operated and managed in accordance with the approved assessment for the life-cycle of the development.

Reason: In the interests of sustainable development and to maximise on-site carbon dioxide savings in accordance with London Plan (2021) Policy SI2, and Local Plan (2017) Policies SP4 and DM21.

Biodiversity

(a) Prior to the commencement of development, a Biodiversity Gain Plan shall be submitted to and approved in writing by the Local Planning Authority. This shall include the details of ecological enhancement measures and ecological protection measures, plans showing the proposed location of ecological enhancement measures, a sensitive lighting scheme, justification for the location and type of enhancement measures by a qualified ecologist, and how the development will support and protect local wildlife and natural habitats. A biodiversity net gain of 10% must be achieved firstly by maximising all on-site biodiversity enhancement measures, and then, through off-site credits.

(b) Prior to the occupation of development, photographic evidence and a post-development ecological field survey and impact assessment shall be submitted to and approved by the Local Planning Authority to demonstrate the delivery of the ecological enhancement and protection measures is in accordance with the approved measures and in accordance with CIEEM standards.

Development shall accord with the details as approved and retained for the lifetime of the development.

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

Urban Greening Factor

Prior to completion of the construction work, an Urban Greening Factor calculation should be submitted to and approved by the Local Planning Authority demonstrating a target factor of 0.3 has been met through greening measures.

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

Planning Obligations Heads of Terms

- Be Seen commitment to uploading energy data
- Energy Plan
- Sustainability Review
- Estimated carbon offset contribution (and associated obligations) of £44,175 (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.

Carbon Management Response 19/03/2024

In preparing this consultation response, we have reviewed:

- Email response dated 19 March 2025
- Overheating Report prepared by Harniss (dated June 2024)
- Relevant supporting documents.

Overheating

	<p>No revisions have been submitted at this stage; therefore, the overheating strategy is still not considered acceptable and revised strategy is expected prior to above ground works.</p> <p>The applicant has agreed to undertake further modelling and submit a revised overheating report showing compliance with relevant CIBSE TM52 and TM59 compliance criteria and London Plan's Cooling hierarchy. This will therefore be conditioned.</p> <p>The applicant is also requested to refer to the cooling and overheating section of the GLA Energy Assessment Guidance 2022, particularly to section 8.10 which states that -</p> <p><i>"In instances where security, air quality or noise concerns pose limitations to the opening of windows, applicants will be required to demonstrate that all passive design measures have been thoroughly investigated. This should include technical and cost feasibility assessments of the following fixed shading devices, external shutters, external blinds, awnings and ventilated louvres. <u>Should natural ventilation not be proposed due to opening limitations, applicants are required to submit two separate overheating analyses: one with openable windows and one with closed windows.</u> This will ensure that passive measures have been maximised, and the façade design has been optimised regardless of the constraints posed by the site's location. Applicants should demonstrate that the assumptions of the overheating model are aligned with the noise and air quality assessments. Applicants are encouraged to refer to relevant published guidance which draws together these areas including Approved Document O and the Acoustics, Ventilation and Overheating Residential Design Guide²⁵ (January 2020)."</i></p> <p>The previous action points have been reiterated and expanded for simplification.</p> <p><u>Actions:</u></p> <ul style="list-style-type: none"> - Modelling of DSY1 2020s weather file: <ul style="list-style-type: none"> ○ Analysis I: All rooms modelled with openable windows demonstrating how the rooms will not overheat in line with the cooling hierarchy maximising all passive measures before introducing mechanical measures. This shall show that passive measures have been maximised in line with the cooling hierarchy. ○ Analysis II: All rooms modelled, and rooms affected by noise and/or air pollution with closed windows demonstrating how the rooms will not overheat, with appropriate overheating mitigation measures in line with Approved Document O. 	
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	<ul style="list-style-type: none"> ○ For both Analysis I & II, report results of the dynamic modelling in line with the TM52/TM59 compliance criteria, (Category I for Care Home) clearly setting out the baseline scenario and additional modelled scenarios to test mitigation measure(s) required to pass the overheating assessment. <ul style="list-style-type: none"> ▪ Baseline scenario ▪ Baseline scenario + mitigation measure 1 ▪ Baseline scenario+ mitigation measure 1 + measure 2, etc. ▪ Full results reported in a table that is colour coded and clearly sets out the maximum hours above Criteria A and B in order to pass the requirement, and a summary of the number of rooms that pass. - Undertake further modelling: <ul style="list-style-type: none"> ○ Model the 2020s DSY 2 and 3 and DSY1 for the 2050s and 2080s. Ensure the design has incorporated as many mitigation measures to pass these more extreme and future weather files as far as feasible. Any remaining overheating risk should inform the future retrofit plan. ○ All single-aspect rooms facing west, east, and south; ○ At least 50% of rooms on the top floor; ○ 75% of all modelled rooms facing South or South/West; ○ Rooms closest to any significant noise and / or air pollution source, with windows closed at all times (with cross reference to the Noise and the Air Quality Assessments to demonstrate the most sensitive receptors and the AVO Residential Design Guide); ○ Habitable communal spaces (e.g. communal living/dining rooms in care homes); ○ Communal corridors, where pipework runs through; - Specify the shading strategy, including: technical specification and images of the proposed shading feature (e.g. overhangs, Brise Soleil, external shutters), elevations and sections showing where these measures are proposed. - 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. - Specify the active cooling demand (space cooling, not energy used) on an area-weighted average in MJ/m² and MY/year? Please also confirm the efficiency of the equipment, whether the air is sourced from the coolest point / any renewable sources. - The applicant must demonstrate that the risk of overheating has been reduced as far as practical and that all passive measures have been explored, including reduced glazing and 	
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	<p>increased external shading. The applicant should also outline a strategy for residents to cope in extreme weather events, e.g. use of fans.</p> <ul style="list-style-type: none"> - Set out a retrofit plan for future and more extreme weather files, demonstrating how these measures can be installed, how they would reduce the overheating risk, what their lifecycle replacement will be, and who will be responsible for overheating risk. - Demonstrate how the future mitigation measures will improve the overheating results. - Identify communal spaces (indoor and outdoor) where residents can cool down if their flats are overheating. - Confirm who will own the overheating risk when the building is occupied (not the residents). - This development should have a heatwave plan / building user guide to mitigate overheating risk for occupants. <p>Planning Conditions</p> <p>The overheating condition have been updated to reflect the clarification provided.</p> <p>Overheating</p> <p><i>Prior to above ground works of the relevant care home or domestic use, a revised Overheating Report shall be submitted to and approved by the Local Planning Authority. The submission shall assess the overheating risk with both open & closed windows in line with CIBSE TM52 and TM59 (using Category I for the Care home element under the London Weather Centre TM49 weather DSY1-3 files for the 2020s, and future weather files DSY1 for the 2050s and 2080s) and demonstrate how the overheating risks have been mitigated and removed through design solutions and provide a retrofit plan.</i></p> <p><i>This report shall include:</i></p> <ul style="list-style-type: none"> - <i>Annotated plans showing which habitable rooms will be affected by noise constraints;</i> - <i>Analysis I: Model all rooms with DSY1 2020s weather file and openable windows demonstrating how the rooms will not overheat, and the passive measures have been maximised in line with the Cooling Hierarchy;</i> - <i>Analysis II: Modelling of all rooms with DSY1 2020s weather file and rooms affected by noise and/or air pollution, or risk of crime with closed windows, demonstrating how the rooms will not overheat, with appropriate overheating mitigation measures in line with the Cooling Hierarchy and the Acoustics Ventilation and Overheating Residential Design Guide.</i> - <i>For both analyses, clearly setting out the baseline scenario and additional modelled scenarios to test mitigation measures required to pass the overheating assessment.</i> 	
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	<ul style="list-style-type: none"> - Details of the design measures incorporated within the scheme in line with the Cooling Hierarchy (including details of the feasibility of prioritising passive cooling and ventilation measures) to ensure adaptation to higher temperatures are addressed, the spaces do not overheat, and the use of active cooling is avoided, including the fixing mechanism, specification, and shading coefficient of any internal and external shading features, and the energy demand of the active cooling for communal areas; - 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 with confirmation that these can be integrated within the design (e.g., if there is space for pipework to allow the retrofitting of cooling and ventilation equipment); - Confirmation who will be responsible to mitigate the overheating risk once the development is occupied. <p>Prior to occupation, the development must be built in accordance with the overheating measures as approved and retained thereafter for the lifetime of the development.</p> <p>REASON: In the interest of reducing the impacts of climate change, to enable the Local Planning Authority to assess overheating risk and to ensure that any necessary mitigation measures are implemented prior to construction, and maintained, in accordance with London Plan (2021) Policy SI4 and Local Plan (2017) Policies SP4 and DM21.</p>	
Flood and Water Management	<p>Thank you for consulting us on the above planning application reference number HGY/2024/3240 for the Demolition of existing buildings and redevelopment to provide a new care home and rehabilitation clinic (Class C2 - Residential Institution) fronting View Road and including up to 50 beds, hydro pool, salon, foyer/central hub, gym/physio room, lounge and dining rooms and consulting rooms, together with a new residential building (Class C3 - Dwelling Houses) fronting North Hill providing 9 flats (5 x1 bed, 3 x 2 bed and 1 x 3 bed), car and cycle parking, refuse/recycling storage, mechanical and electrical plant, hard and soft landscaping, perimeter treatment and associated works at 103-107 North Hill, Hornsey, London, N6 4DP</p> <p>Having reviewed the applicant's submitted Surface Water and Foul Drainage Statement report reference number 2100313-ACE-XX-XX-RP-C-0331 dated November 2024 as prepared by Ardent Consulting Engineers, we have no observation to make on the above planning application. We are satisfied that sufficient information have been received in terms of assessing the above full planning application and if the site is to be built, operate, manage and maintain as per the above referred Flood Risk Assessment and Drainage Strategy report, we are content that the impact of surface water drainage have been adequately addressed.</p>	Comments noted

Trees	The proposal is satisfactory	Comments noted
Waste Management	<p>I can confirm that the proposed refuse arrangements for the residential flats are acceptable, as long as the residential containers are moved to the temporary storage point at the front of the building prior to collection. For the residential units, containers should be provided for general waste, mixed dry recycling and food waste and for 9 flats we would advise the following:</p> <ul style="list-style-type: none"> • Refuse - 2 x 1,100 litre eurobins • Mixed dry recycling - 1 x 1,100 litre eurobin • Food waste - 1 x 140 litre wheelie bin <p>I noticed that 103 -107 North Hill has parking opposite so the road is single track where the bins are to be presented (although this is the current pick-up point) so the traffic team may have some comments about that.</p> <p>Our guidance advises a threshold of 6 units rather than 10 which is why we advise the use of eurobins but if wheelie bins are used instead, then there would need to be the following provision:</p> <ul style="list-style-type: none"> • General waste – 9 x 240 litre wheelie bins. • Mixed dry recycling – 5 x 240 litre wheelie bins • Food waste – 1 x 140 litre wheelie bin <p>The concern with residents presenting the bins for collection is the reliability of that happening. Will the occupants have their own bin and each be responsible for putting it out ? What will happen where they share the recycling / food waste containers and who will be responsible for presenting those for collection? How will they know about the arrangements?</p> <p>Applicants response</p> <p>In principle we are happy with the provisions highlighted in relation to the number of wheelie bins required for the flats. The intention is for each of the flats to have their own individual numbered / designated wheelie bin for general waste, a wheelie bin per floor to be shared between the flats for mixed dry recycling and then proposing the use of individual caddy bins to each flat for food waste.</p>	Waste comments noted. The Delivery and Servicing Plan condition will address waste collection concerns

	<p>Residents / occupants will oversee making sure that their individual general waste bin is moved to the collection point either before or on the day of collection. In terms of the mixed dry recycling bins, it would be the responsibility of the flats on each of the floors to make sure that this bin is moved to the collection point and decide between themselves who carries this out. Obviously, the individual caddy bins that we are proposing for food waste would also be the responsibility of the resident / occupant of the flat to again make sure that this bin is within the collection point when required. The arrangements for the bin collection will be explained to a potential buyer upon either purchasing or renting of the flats.</p>	
EXTERNAL		
Thames Water	<p>Waste Comments As required by Building regulations part H paragraph 2.36, Thames Water requests that the Applicant should incorporate within their proposal, protection to the property to prevent sewage flooding, by installing a positive pumped device (or equivalent reflecting technological advances), on the assumption that the sewerage network may surcharge to ground level during storm conditions. If as part of the basement development there is a proposal to discharge ground water to the public network, this would require a Groundwater Risk Management Permit from Thames Water. 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 will be undertaken to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 02035779483 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>The proposed development is located within 15 metres of our underground waste water assets and as such we would like the following informative attached to any approval granted. "The proposed development is located within 15 metres of Thames Waters underground assets and 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 Phone: 0800 009 3921</p>	<p>Comments noted Informatives included</p>

(Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB

There are public sewers crossing or close to your development. If you're planning significant work near our sewers, it's important that you minimize the risk of damage. We'll need to check that your development doesn't limit repair or maintenance activities, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. <https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes>

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 guidance under sections 167, 168 & 169 in the National Planning Policy Framework. 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/help/home-improvements/how-to-connect-to-a-sewer/sewer-connection-design>

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.

Thames Water would advise that with regard to WASTE WATER NETWORK and SEWAGE TREATMENT WORKS infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.

Water Comments


	<p>There are water mains crossing or close to your development. Thames Water do NOT permit the building over or construction within 3m of water mains. If you're planning significant works near our mains (within 3m) we'll need to check that your development doesn't reduce capacity, limit repair or maintenance activities during and after construction, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. 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>	
Transport for London	<p>Having assessed the proposals, I can confirm that TfL Spatial Planning has no strategic comments to make on this planning application other than to emphasise the development should comply with the transport policies set out in The London Plan 2021. In particular the car and cycle parking standards in tables 10.2 – 10.6 (inclusive). Cycle parking should comply with the London Cycling Design Standards (https://tfl.gov.uk/corporate/publications-and-reports/streets-toolkit) including the provision of at least 5 % wider bike space.</p> <p>TfL has no objection to this planning application, providing that the development itself including any works does not impact on the operation of bus services. Please contact me if you consider that there are any strategic as opposed to local transport issues raised by this case. If the development is permitted I recommend the developer is reminded of the following:</p> <p>North Hill supports various bus routes. In the event that implementation of the development requires the temporary re-routing of bus services or temporary or permanent closure or alteration of a bus stop or shelter or other such arrangements, these must be agreed with TfL before the work.</p>	Comments note Cycle parking condition included

<p>Historic England</p>	<div data-bbox="734 204 1014 271">  <p>Historic England</p> </div> <div data-bbox="521 359 1216 510"> <div> <p>Ms Valerie Okeiyi London Borough of Haringey River Park House 225 High Road Wood Green LONDON N22 8HQ</p> <p>Direct Dial: 020 7973 3712 Our ref: P01586399 19 December 2024</p> </div> </div> <div data-bbox="521 550 1243 1252"> <p>Dear Ms Okeiyi</p> <p>T&CP (Development Management Procedure) (England) Order 2015 & Planning (Listed Buildings & Conservation Areas) Regulations 1990</p> <p>103-107 NORTH HILL, HORNSEY, LONDON, N6 4DP Application No. HGY/2024/3240</p> <p>Thank you for your letter of 11 December 2024 regarding the above application for planning permission.</p> <p>Historic England provides advice when our engagement can add most value. In this case we are not offering advice. This should not be interpreted as comment on the merits of the application.</p> <p>We suggest that you seek the views of your specialist conservation and archaeological advisers. You may also find it helpful to refer to our published advice at https://historicengland.org.uk/advice/find/</p> <p>It is not necessary to consult us on this application again, unless there are material changes to the proposals. However, if you would like advice from us, please contact us to explain your request.</p> <p>Please note that this response relates to designated heritage assets only. If the proposals meet the Greater London Archaeological Advisory Service's published consultation criteria we recommend that you seek their view as specialist archaeological adviser to the local planning authority.</p> <p>The full GLAAS consultation criteria are on our webpage at the following link: https://www.historicengland.org.uk/services-skills/our-planning-services/greater-london-archaeology-advisory-service/our-advice/</p> <p>Yours sincerely</p> <div data-bbox="521 1300 1243 1364"> <div>  <p>4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA Telephone 020 7973 3700 HistoricEngland.org.uk</p> </div> </div> <p><small>Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any information held by the organisation can be requested for release under this legislation.</small></p> </div>	<p>Comment noted</p>
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Historic England

Steve Hurst
Business Officer
E-mail: steve.hurst@HistoricEngland.org.uk

LB Camden	<div data-bbox="501 268 784 360"> <p>Application ref: 2025/0009/P Contact: Sofie Fieldsend Tel: 020 7974 4607 Email: Sofie.Fieldsend@camden.gov.uk Date: 9 January 2025</p> </div> <div data-bbox="999 229 1182 271">  Camden </div> <div data-bbox="999 287 1182 466"> <p>Development Management Regeneration and Planning London Borough of Camden Town Hall Judd Street London WC1H 9JE Phone: 020 7974 4444 planning@camden.gov.uk www.camden.gov.uk/planning</p> </div> <div data-bbox="501 600 629 617"> <p>Dear Sir/Madam</p> </div> <div data-bbox="801 633 889 651"> <p>DECISION</p> </div> <div data-bbox="501 675 896 694"> <p>Town and Country Planning Act 1990 (as amended)</p> </div> <div data-bbox="501 713 1010 732"> <p>Request for Observations to Adjoining Borough - No objection</p> </div> <div data-bbox="501 754 649 831"> <p>Address: 103-107 North Hill Hornsey London N6 4DP</p> </div> <div data-bbox="501 852 1182 1029"> <p>Proposal: Demolition of existing buildings and redevelopment to provide a new care home and rehabilitation clinic (Class C2 - Residential Institution) fronting View Road and including up to 50 beds, hydro pool, salon, foyer/central hub, gym/physio room, lounge and dining rooms and consulting rooms, together with a new residential building (Class C3 - Dwelling Houses) fronting North Hill providing 9 flats (5 x1 bed, 3 x 2 bed and 1 x 3 bed), car and cycle parking, refuse/recycling storage, mechanical and electrical plant, hard and soft landscaping, perimeter treatment and associated works. Drawing Nos: See Haringey Council planning application ref. HGY/2024/3240</p> </div> <div data-bbox="501 1050 1128 1088"> <p>The Council, as a neighbouring planning authority, has considered your request for observations on the application referred to above and hereby raises no objection.</p> </div> <div data-bbox="501 1129 613 1147"> <p>Informative(s):</p> </div> <div data-bbox="519 1168 1149 1265"> <ol style="list-style-type: none"> Reason for no objection: The site is a significant distance from the London Borough of Camden. It is not considered to impact on its townscape and heritage assets, amenity of Camden residents, biodiversity, transport or air quality conditions in Camden. No objection is raised to the proposals as far as they relate to LB Camden. The </div>	Comment noted
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application should be determined under Haringey's planning policies.

In dealing with the application, the Council has sought to work with the applicant in a positive and proactive way in accordance with the National Planning Policy Framework. The council publishes its adopted policies online, along with detailed Camden Planning Guidance. It also provides advice on the website for submitting applications and offers a pre-application advice service.

Yours faithfully

A handwritten signature in black ink, appearing to read 'DP', is positioned above the printed name and title.

Daniel Pope
Chief Planning Officer

**The Greater
London
Archaeological
Advisory
Service
(GLAAS)**



Ms Valerie Okelyi
London Borough of Haringey
Level 6
River Park House
225 High Road
Wood Green
N22 8HQ

Your Ref: HGV/2024/3240
Our Ref: 228396

Contact: Valeria Powell
07443 316 448
Valeria.Powell@historicengland.org.uk

15 January 2025

Dear Ms Okelyi,

**TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)
NATIONAL PLANNING POLICY FRAMEWORK 2023**

103-107 North Hill, Hornsey, London, N6 4DP

Demolition of existing buildings and redevelopment to provide a new care home and rehabilitation clinic (Class C2 - Residential Institution) fronting View Road and including up to 50 beds, hydro pool, salon, foyer/central hub, gym/physio room, lounge and dining rooms and consulting rooms, together with a new residential building (Class C3 - Dwelling Houses) fronting North Hill providing 9 flats (5 x 1 bed, 3 x 2 bed and 1 x 3 bed), car and cycle parking, refuse/recycling storage, mechanical and electrical plant, hard and soft landscaping, perimeter treatment and associated works.

Recommend No Archaeological Requirement

Thank you for your consultation received on 11 December 2024.

The Greater London Archaeological Advisory Service (GLAAS) gives advice on archaeology and planning. Our advice follows the National Planning Policy Framework (NPPF) and the GLAAS Charter.

NPPF section 16 and the London Plan (2021 Policy HC1) make the conservation of archaeological interest a material planning consideration.



Historic England, 4th Floor, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA
Telephone 020 7973 3700 Facsimile 020 7973 3001
HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.
Correspondence or information which you send us may therefore become publicly available.

Comment noted

	<p>The planning application is not in an Archaeological Priority Area.</p> <p>Having considered the proposals with reference to information held in the Greater London Historic Environment Record and/or made available in connection with this application, I conclude that the proposal is unlikely to have a significant effect on heritage assets of archaeological interest. The site lies outside the Tier 3 Archaeological Priority Area for the mediaeval Bishop's Park. However key features of the park such as the park pale are unlikely to occupy this site as there is already a basement on the site. A watching brief next door at 101 North Hill in 2001 found no remains earlier than Victorian cellars.</p> <p>No further assessment or conditions are therefore necessary.</p> <p>This response relates solely to archaeological considerations. If necessary, Historic England's Development Advice Team should be consulted separately regarding statutory matters.</p> <p>Yours sincerely</p> <p>Valeria Powell</p> <p>Assistant Archaeology Adviser Greater London Archaeological Advisory Service London and South East Region</p>	
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PLANNING DECISION NOTICE

Valerie Okeiyi
Planning Placemaking and Housing Haringey Council
Alexandra House, (5th Floor)
10 Station Road
London
N22 7TR

Development Management Service
Planning and Development
Islington Town Hall
London, N1 2UD
Planning@islington.gov.uk
W www.islington.gov.uk

Case Officer: Stefan Kukula
E: planning@islington.gov.uk

Issue Date: 20 January 2025
Application No: P2025/0060/OBS

(Please quote in all correspondence)

TOWN AND COUNTRY PLANNING ACTS

BOROUGH COUNCIL'S DECISION: Observations to Adjoining Borough – No comments

Notice is hereby given, in respect to the request for observation(s), of the above stated response of Islington Borough Council, the Local Planning Authority, in pursuance of its powers under the above mentioned Acts and Rules, Orders and Regulations made thereunder. The response relates to the application / development referred to below, at the location indicated.

The observations (if any) of the Borough Council are noted below.

Location:	103-107, North Hill, Hornsey, London, N6 4DP
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Application Type:	Observations to Adjoining Borough	Application Received	07-Jan-2025
Application Valid:	07-Jan-2025	Application Target	03-Mar-2025

DEVELOPMENT:

Observations to Neighbouring Borough - London Borough of Haringey for planning application ref: HGY/2024/3240

Planning Officer: Valerie Okeiyi

Re: 'Demolition of existing buildings and redevelopment to provide a new care home and rehabilitation clinic (Class C2 - Residential Institution) fronting View Road and including up to 50 beds, hydro pool, salon, foyer/central hub, gym/physio room, lounge and dining rooms and consulting rooms, together with a new residential building (Class C3 - Dwelling Houses) fronting North Hill providing 9 flats (5 x1 bed, 3 x 2 bed and 1 x 3 bed), car and cycle parking, refuse/recycling storage, mechanical and electrical plant, hard and soft landscaping, perimeter treatment and associated works. [Haringey Council reference: HGY/2024/3240]'.

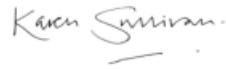
OBSERVATIONS:

The London Borough of Islington has no comments to make.

Certified that this document contains a true record of a decision of the Council

Comment noted

Yours faithfully

A handwritten signature in black ink, appearing to read "Karen Sullivan". The signature is written in a cursive, flowing style.

**KAREN SULLIVAN
SERVICE DIRECTOR - PLANNING AND DEVELOPMENT
AND PROPER OFFICER**

Designing Out Crime Officer



MORE TRUST | LESS CRIME | HIGH STANDARDS

C/O Valerie Okeiyi
London Borough of Haringey
Planning and Building Control
6th Floor River Park House
225 High Road
Wood Green
N22 8HQ

Designing Out Crime Office
Bow Road Police Station
111-117 Bow Road
Tower Hamlets E3 2AN
Email: ian.waylen@met.police.uk
Our ref: NE 6573
Date: 20/03/2025

Application Number: HGY/2024/3240

Location: 103-107 North Hill, Hornsey, London, N6 4DP

Proposal: Demolition of existing buildings and redevelopment to provide a new care home and rehabilitation clinic (Class C2 - Residential Institution) fronting View Road and including up to 50 beds, hydro pool, salon, foyer/central hub, gym/physio room, lounge and dining rooms and consulting rooms, together with a new residential building (Class C3 - Dwelling Houses) fronting North Hill providing 9 flats (5 x 1 bed, 3 x 2 bed and 1 x 3 bed), car and cycle parking, refuse/recycling storage, mechanical and electrical plant, hard and soft landscaping, perimeter treatment and associated works.

Section 1 – Introduction

Dear Haringey Planning,

Thank you for allowing us to comment on the above planning proposal.

With reference to the above application we have had an opportunity to examine the details submitted and would like to offer the following comments, observations and recommendations. These are based on relevant information to this site (Please see Appendices), including my knowledge and experience as a Designing Out Crime Officer and as a Police Officer.

It is in our professional opinion that crime prevention and community safety are material considerations because of the mixed use, complex design, layout and the sensitive location of the development. To ensure the delivery of a safer development in line with L.B. Haringey DMM4 and DMM5 (See Appendix), we have highlighted some of the main comments we have in relation to Crime Prevention (Appendices 1).

I can confirm we have not met with the project design team to review Safety, Security or Crime Prevention.

We have concerns around some aspects of the design and layout of the development. At this point it can be difficult to design out fully any issues identified. At best crime can only be mitigated against, as it does not fully reduce the opportunity of offences.

We request that the developer continues to contact us to ensure that the development is designed to reduce crime at an early.

[met.police.uk](https://www.met.police.uk)

Comments noted.
Conditions/Informative
included

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Whilst in principle we have no objections to the site, we have recommended the attaching of suitably worded conditions and an informative. The comments made can easily be mitigated early if the Architects ensure the ongoing dialogue with our department continues throughout the design and build process. This can be achieved by the below Secured by Design conditions being applied (Section 2). If the Conditions are applied, we request the completion of the relevant SBD application forms at the earliest opportunity.

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

Please provide my details to the applicant so we can discuss and address our concerns.

Section 2 - Secured by Design Conditions and Informative:

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

Conditions:

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

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

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

- C. Commercial aspects of the development must achieve the relevant **Secured by Design Accreditation** at the final fitting stage, prior to residential occupation of such building in accordance with condition B (Secured by Design) and commencement of business. Details shall be submitted to and approved, in writing, by the Local Planning Authority
Reason: In the interest of creating safer, sustainable communities.

Informative:

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

Section 3 - Conclusion:

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

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MORE
TRUST

LESS
CRIME

HIGH
STANDARDS

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

Yours faithfully,

Ian Waylen 1973CO
Designing Out Crime Officer
METROPOLITAN POLICE SERVICE

This report gives recommendations. Please note that Crime Prevention Advice and the information in this report does not constitute legal or other professional advice; it is given free and without the intention of creating a contract or without the intention of accepting any legal responsibility. It is based on the information supplied and current crime trends in the area. All other applicable health, safety and fire regulations should be adhered to.

Appendix 1: Concerns and Comments

In summary we have overall site specific comments in relation to the following items. This list is not exhaustive and acts as initial observations based on the available plans from the architect and local authority planning portal.

Site specific advice may change depending on further information provided or site limitations as the project develops:

This list is not exhaustive and acts as concerns raised during consultation with the architects pre-application.

Site specific advice may change depending on further information or site limitations as the project develops:
To be utilised in further discussions with the appointed developer at a later stage.

Boundary Treatment

- Ideally side and rear boundary onto the public realm should be 2.4m (potentially 1.8m with 600mm trellis or 2.1m with a 300mm trellis). Any vertical transom (support) should be inward facing
- Metal fabrication, should be robust, have an unfinished top rail (exposed tops), to deter loitering, sitting and climbing. We recommend 358 gauge weld mesh fence panels
- If fencing is constructed of wood material, ensure panels are vertical with no support beams allowing climbing opportunities. Panels to be mechanically secured in place to prevent lift removal
- All perimeter railings to have a maximum 50mm spacing centre to centre, be set flush to the front of any wall. If strengthened with mid rail must be designed to deter climbing and mid rail to be inward facing. Any perimeter boundary treatment (railings) should be between 1.8m - ideally designed to provide visual permeability
- Gates to be designed level to the front building line, any locking mechanism, hinges to be anti-climb and fitted with a dampened stop. Gating to be inclusive of a self-closer and the same height as the perimeter treatment including any trellising

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- Where possible building lines should be flush to allow natural surveillance, any recesses should not exceed 600mm
- If anti-climbing measures are introduced then signage should be used to comply with occupier's liability Act 1984
- Any boundary treatments should be UKAS certified as recommended by a DOCO
- All low defensive wall/railings to be designed to deter sitting, loitering and climbing.

Access Control

- Key fob access control with a data logging system is recommended as this is more efficient to deactivate/replace lost/stolen keys. It can also assist with identifying any misuse
- Data to be stored for one calendar month before being over written
- Access control panels to have audio/visual capability. Primary camera on panel to capture all visitors
- **No** Trade Button on control panels
- Emergency Exit (push to release) primary egress routes that are required to have an emergency escape mechanism should be self-resetting, shrouded and in best practice be alarmed
- Plant/Service room door set/s accessible by public realm are required to be one of the following UKAS certified products:
 - LPS1175 issue 7 SR2 (or LPS 1175 Issue 8 B3) or
 - STS202 BR 3 or
 - LPS2081 SR2 B+ or Equivalent certification
- Consideration required regarding the security/risk management to Internet Of Things (IOT)

Note: Service/plant door/s should be self-closing, self-locking single doors.

Communal Entrance

- Additional doorset required below external entrance canopy and for the foyer/Central Hub, to create a secure lobby. Doorsets should be flush with the building line to prevent any recesses and should be certified to LPS1175 B3 SR2 or STS202 BR3.
- Communal door sets should be self-closing, self-locking and incorporate a single leaf. External entry should be restricted by key fob, key, key code or proximity reader.
- Communal door sets should have vandal resistant audio/visual access control panels with electronic lock release – **NO Trade Buttons are permitted.**

Door/Window Specifications

- All easily accessible windows should be certificated to either PAS24:2022 P2A, STS204 Issue 3, LPS 1175 SR2/B3 or LPS 2081 Issue 1 Security Rating A.
- All glazing in and adjacent to communal, front, back doors and ground floor windows as well as windows that are easily accessible above ground floor level should incorporate one pane of laminated glass meeting the requirements of BS EN 356:2000 class P2A...
- Accessible windows includes any glass reached by climbing any number of floors via rain water pipes, balconies or via communal walkways (whether the walkway is accessed through a secure door or not).
- It also includes any area which has a hand hold within three meters of the ground. All easily accessible windows should have key operated locks. Where windows are required under Building Regulations to act as a fire escape route, the opening window must not have key operated locks.
- Windows that form an integral part of the doorframe should be shown to be part of the manufacturers certified range of door sets. Alternatively where windows are manufactured separately from the door frames, they should be certified to either PAS24:2022, STS202 or

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LPS2081. In such cases the window should be securely fixed to the door set in accordance with the manufacturer requirements.

- All ground floor and vulnerable windows must have a lockable window restrictor to prevent unauthorized access – however consideration needs to be given if the windows are escape windows.
- Where curtain walling is proposed the minimum standard that should be accepted is BS EN1627 RC3 with P4A glazing..
- We recommend that all doorsets providing access to individual residential units should be tested and certificated to PAS24:2022 and fitted with a locking mechanism that forms part of the doorsets tested range. Where the doorset will also form part of the fire strategy then dual certification will be necessary.
- The slave door of all double leaf internal doors must always be locked.
- External secure maintenance gates should be tested and certified to meet LPS1175 B3 SR2 or STS202 BR3. They should have key fob access control and meet the same height as the boundary treatment. Consider adding light trellis above.

Fire Escape Doorsets

The external fire escape doorsets from each stair core should be products that are tested and certificated to LPS 1175 SR2/B3 or STS 202 BR3. These doorsets should each be fitted with self-closing mechanisms and secured with at least two magnetic locks, mounted ¼ from the top and bottom, each with an individual holding force of 500kg. These doorsets should not have any external furniture, fob access or visitor call point, and should be alarmed to prevent misuse which could undermine the security of the development. There should be no external ironmongery on fire exits to prevent aiding forced entry.

Managers Office Doorsets

The doorsets to each of the managers' offices should be products that have been tested and certified to PAS24:2022 with any integral glazing to at least BS EN 356:2000 Class P3A. These doorsets should be secured using locking methods that form part of the doorsets tested and certified scope, with access controlled by staff. There should not be signage indicating the use of these offices as it could result in people bypassing the normal process for dealing with complaints and issues.

ACB (Access Control Box) / Fire Access

- An external fire over ride switch (FOS) should be protected with the use of an accredited security product such as a Gerda Box. Consideration to other suppliers of this type of fire switch protection method should be given, check SbD web site.
In addition to the use of an ACB see below re Premises Information Box (PIB).
[https://www.gerdasecurity.co.uk/productsandservices/frs-locking-system/access-control-box-\(acb\).aspx](https://www.gerdasecurity.co.uk/productsandservices/frs-locking-system/access-control-box-(acb).aspx)
- Premises information box (PIB) typically used to store site specific documentation such as communal access routes, fire risers etc. PIB is generally located behind the primary security layer and is intended for LFB use only (Refer to current Homes guidance)
- If the cause and effect of a fire over ride switch (FOS) activation poses a crime risk consideration to a Drop Key Protection Box should be made
- The project fire consultant should be made aware of any Part B Security v's Safety conflicts
[https://www.gerdasecurity.co.uk/productsandservices/frs-locking-system/drop-key-protection-box-\(dpcb\).aspx](https://www.gerdasecurity.co.uk/productsandservices/frs-locking-system/drop-key-protection-box-(dpcb).aspx)

Cycle storage

- Internal access doors to be ether:

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- LPS1175 issue 7 SR2 (or LPS 1175 Issue 8 B3) or
 - STS202 BR 3+ or
 - LPS2081 SRB or Equivalent certification
- Must be single leaf, self-closing and self-locking with access control ideally using magnetic locks
- Cycle storage lighting is required in all stores. In areas of no natural light or hours of darkness, a constant level of lighting is required for illumination. Connected lighting to provide low level lighting during inactivity and higher light levels when motion is detected
 - **No** external signage
 - CCTV must be installed in cycle stores. Should have unhindered views of the racking at all times and should be vandal resistant
 - There should be 3 locking points for cycles on the racks/stands provided. Cycle racking should be secured with anti-tamper fixings
 - Cycle store doors should allow light spill from with-in, either a small obscured viewing panel or robust louvre (as part of the door set)
 - Internal signage should ideally be placed inside the store to reinforce importance of securing cycles
 - If timber storage/sheds are to be used, then these must be of robust construction and designed to the SbD guidance (Sec 56). Requires at least 2 points of locking on the main door. If items of value are to be stored within the shed then a security anchor should be certificated to 'Sold Secure' Silver Standard LPS 1175 SR1 or LPS 1175 B3.

Bin Storage

External entrance door should be to LPS 1175 SR2/B3 standard incorporating self-closing hinges, a thumb turn on the inside of the door, PIR lighting and 358 close weld mesh reinforcement on the internal face of louvers, if they incorporate a slatted ventilation design. This should be data logged and fob controlled with 2 maglocks sited 1/3 from the top and bottom and able to withstand 1200lbs/500kg of pressure individually.

Alarm System

- The proposed site should benefit from an alarm system; the minimum requirement is a Grade 3 alarm system. Which should include anti-masking properties.
- All alarm systems to be compliant with PD 6662, and only certificated equipment should be used.
https://www.securedbydesign.com/images/ALARM_STANDARD_TECHNICAL_GUIDE_VERSION_2.pdf

Postal Strategy

Mailboxes should be covered by CCTV and meet TS009 standards or MPS robust mailbox specification below:

- A minimum of 1.5mm thick galvanized steel construction. Its depth and width must allow mail to fall below the fishing plate unrestricted
- Fitted with a 3-point locking mechanism supported with a minimum five pin cam lock
- BS EN 1303:2005 (Inc corrigendum Aug 2009) compliant five/six pin camlock must have anti-drill, anti-bump and anti-pick lock attributes
- Gap restricting aperture (anti-fishing max 260mmx40mm) The anti-fishing plate must be fabricated as part of the post box construction and extend into and across the full length of the letterbox opening to defend against the interference of mail, anti-leverage surrounding trim, welded claw on retrieval door to negate the ability to gain a leverage point and compromise the security of the mailbox
- Unit to have a minimum of 13Ltrs storage.

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Lightwell boundary treatment

Proposed designs include a low brick wall with railings or glazing panels above. The railings should be open topped and sit flush with the edge of the wall to make it more uncomfortable for any perpetrator to climb over. Glazing panels should also sit flush with the wall with no gaps underneath, to prevent perpetrators climbing over.

Lighting

- Public realm lighting whether adopted highways/footpaths/private estate roads or car parks should meet BS 5489:2020 standard
- Internal lighting Communal elements of any scheme, ideally should be a controlled by a photo electric sensor. This to ensure suitable levels of lighting at all times. Where no natural light is available two phased lighting can be used (low level for non-activity, higher level once movement is detected).
- Dusk-Till-Dawn lighting where possible should consist of white light which is evenly distributed. In communal areas all entrances should have dusk till dawn lighting supported via a photo electric cell. Allowing lighting to controlled automatically.
- Bollard lighting **shall be avoided** due to its history of vandalism and ease of covering. Up lighters and decorative lighting can be used but only in unison with columns providing the required standards of light for good clear facial recognition illumination.

Climbing Aids

- It is recommended that any climbing aids such as balconies, canopies, protruding brickwork/cladding etc., should not be positioned near any windows/doors and fixed flush with the building/boundary. This will mitigate against burglaries and domestic violence perpetrators.
- Canopies above entrances should be avoided to deter rough sleepers or the concealment of any perpetrators from misusing this area. If canopies are used then the depth must be below 600mm and they must be non-load bearing. If any canopy is robust enough to withstand a person standing on top, all nearby windows will be classed as vulnerable and therefore will be required to be PAS24 P2A.
- Any drain/rain pipes should ideally be internally installed. External drain/rain pipes should be of square design and sit flush against the building to prevent them being used as a climbing aid. They should be located away from any windows or balconies.

Roof Access

- AOV's should not be restricted from working, however can be reinforced potentially with fixed grille or railing (LPS 1175 SR1) to prevent unauthorised access
- Easily accessible roof lights should be a one of the following standards:
 - PAS24:2022 or
 - STS 204 or
 - LPS1175 SR1 or
 - STS202 BR1 or
 - LPS2081 SR A
- If roof door access is required for "maintenance only" the door should be PAS24:2022 as a minimum. This door should be secured ideally with a key. However, access control can be used in conjunction with a recommended locking mechanism and must be restricted to maintenance staff only.

CCTV / Alarm

- Any alarm installed should meet BS EN 50131 (as minimum)
- CCTV should complement other security measures, not replace them. As a minimum police recommend coverage of the following areas:
 - Entrance & exit points including secondary coverage of call points

- Foyer / Lobby areas
- Post boxes and Postal rooms
- Cycle stores
- Refuse stores
- Top of stair cores
- Image quality should be able to provide facial recognition and colour HD quality during daylight and night time
- CCTV housing to be anti-vandal and potentially shrouded. Signage highlighting use of CCTV should displayed throughout the development
- Footage should be preserved for a minimum of 31 days
- Any CCTV system that captures footage of public areas must comply with the regulations outlined by the Information Commissioner's Office
- To be stored securely on a remote cloud system, or on a locked and secured hard drive i.e. within a secure area behind a PAS24:2022 door or SR1 lockable steel cabinet
- Police access to footage must be within a minimum of 24 hours and a maximum of 48 hours for evidential purposes..

Management plan to incorporate

- The secure movement and handling of cash, including appropriate 'Safe grades' for cash storage/ retention on site.
- Securing of any valuable equipment and storing out of sight from windows etc.

Note - There are further concerns that need to be discussed with the applicant.

Lithium Ion Battery Devices and Vehicles Disclaimer

This development / application has cycle storage facilities and / or areas that may require the charging and storage of Lithium-ion powered vehicles or devices, within the building or the wider site footprint. The developer or developer's agent must be aware that it is their responsibility to inform the Responsible Person(s), Fire and Rescue Service and Building Control of these storage facilities and areas, to ensure that the necessary fire suppression measures for the charging and storage of lithium-ion products have been considered and specified.

The LFB guidance on this matter can also be passed to partners who ask for additional guidance.

https://www.london-fire.gov.uk/media/8064/gn_103-charging-and-storage-for-electric-powered-personal-vehicles.pdf

Appendix 2: Planning Policy**London Plan 2021****Policy D11: Safety, Security and Resilience to Emergency**

This policy links design out crime, counter terrorism prevention measures and acknowledges fire safety issues.

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Section B of policy D11

Boroughs should work with their local Metropolitan Police Service 'Design Out Crime' officers and planning teams, whilst also working with other agencies such as the London Fire Commissioner, the City of London Police and the British Transport Police to identify the community safety needs, policies and sites required for their area to support provision of necessary infrastructure to maintain a safe and secure environment and reduce the fear of crime. Policies and any site allocations, where locally justified, should be set out in Development Plans.

Section C of policy D11

These measures should be considered at the start of the design process to ensure they are inclusive and aesthetically integrated into the development and the wider area.

The policy considers not just crime, but also a wide range of hazards, such as fire, flood, extreme weather and terrorism.

New buildings should therefore be **resilient** to all of these threats.

Paragraph 3.11.3

Measures to **design out crime**, including counter terrorism measures, should be integral to development proposals and considered early in the design process, taking into account the principles contained in guidance such as the Secured by Design Scheme published by the Police.... This will ensure development proposals provide adequate protection, do not compromise good design, do not shift vulnerabilities elsewhere, and are cost-effective. Development proposals should incorporate measures that are proportionate to the threat of the risk of an attack and the likely consequences of one.

Paragraph 3.11.4

The Metropolitan Police (Designing Out Crime Officers and Counter Terrorism Security Advisors) should be consulted to ensure major developments contain appropriate design solutions, which mitigate the potential level of risk whilst ensuring the quality of places is maximised.

Paragraph 3.12.10

Fire safety and security measures should be considered in conjunction with one another, in particular to avoid potential conflicts between security measures and means of escape or access of the fire and rescue service. Early consultation between the London Fire Brigade and the Metropolitan Police Service can successfully resolve any such issues.

DMM4 (Policy DM2) Part A(d) "Have regard to the principles set out in 'Secured by Design'"

DMM5: Para 2.14 - "Proposals will be assessed against the principles of secured by design". The latest published guidance in this respect should be referred."

An Independent Sustainability report by AECOM on Tottenham area action plan states: "Crime is high in Tottenham with many residents concerned about safety, gang activity and high crime rates. Issues are particularly associated with Northumberland Park and Tottenham Hale".

12.3 of same report states:

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- Crime rates are relatively high across the borough and crime is particularly prevalent in Northumberland Park. There is a need to design schemes in order to reduce levels of crime, fear of crime and anti-social behavior. Since unemployment is strongly correlated with acquisitive crime, there may also be a link to wider economic development.
- There are no references to crime in the **overarching policies**, although it is recognised that housing and economic policies aim to support a very significant level of regeneration in the area. This could indirectly lead to reduced crime / fear of crime in the medium term through creating more high quality environments and more stable communities. **AAP 06** includes requirements on urban design and character and seeks to maximise opportunities to create legible neighbourhoods, which may assist in creating safe, modern and high quality places.
- There are no references to crime in the **neighbourhood area sections**; however they do set out key objectives which include considerations for safe and accessible environments. Furthermore, as noted above, the scale of regeneration proposed should indirectly lead to reductions in crime and fear of crime. Crime is particularly high in Northumberland Park and Tottenham Hale, hence this issue might be explicitly addressed in these sections; however, it is recognised that the DM Policies DPD includes Borough wide requirements in this regard. Also, AAP 06 sets out the Council's commitment to preparing Design Code Supplementary Planning Documents (SPDs) for Tottenham's Growth Areas, where opportunities for secure by design principles can be investigated.
- In **conclusion**, the plan is likely to result in positive effects on the crime baseline if there is large scale regeneration (including jobs growth) and robust implementation of safer streets and other measures to design out crime in Tottenham, including particularly in Northumberland Park where crime levels are highest.

The **Supplementary Planning Documents 'Designing Safer Places'** and **'Landscaping'** provide further additional guidance supporting the recommendations.

- **Section 17 of the Crime and Disorder Act 1988** states "It shall be the duty of each Authority to which this section applies to exercise its various functions with due regard to the likely effect of the exercise of those functions on and the need to do all it reasonably can to prevent Crime and Disorder in its area", as clarified by PINS953.
- **The National Planning Policy Framework (NPPF)**

"Planning policies and decisions should aim to ensure that developments create: *Safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion.*"

Appendix 3: Crime Figures

The crime figures provided below are publicly available on the Internet at <http://www.met.police.uk/>. The figures can at best be considered as indicative as they do not include the wide variety of calls for police assistance which do not result in a crime report. Many of these calls involve incidents of anti-social behaviour and disorder both of which have a negative impact on quality of life issues.

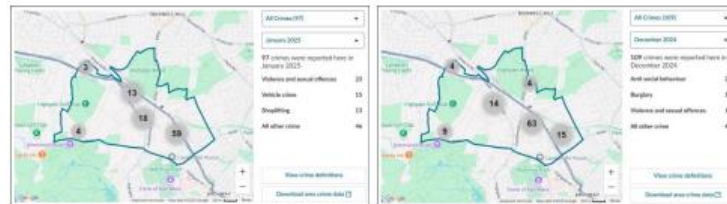
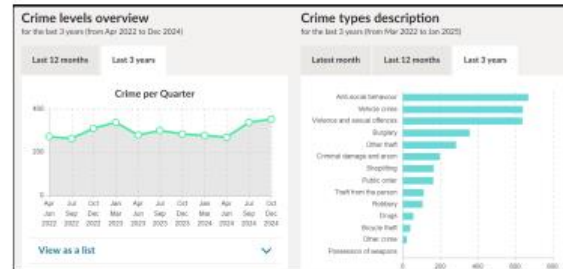
Haringey is one of 32 London Boroughs policed by the Metropolitan Police Service. It currently has crime figures above average for the London Boroughs and suffers from high levels of crime and disorder to its

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residents and business communities.

The following figures relate to recorded crime data from Police.uk for the below area:

Highgate ward

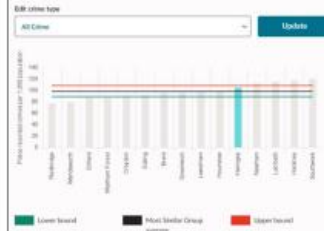


The most commonly reported crimes on this ward during January 2025 were: Violence, Vehicle crime, Shoplifting and Burglary. The crime levels over the last 36 months have fluctuated but appear to be increasing. These crime types along with Anti-social behaviour are also the most commonly reported crimes over the last 36 months.

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Crime in Haringey compared with crime in similar areas

In the year ending September 2024, the crime rate in Haringey was about the same as the average crime rate across similar areas.



The red and green lines show how far the crime rate would normally vary from the average. Haringey lies between the red and green lines, so its crime rate is normal for the group.

About this chart

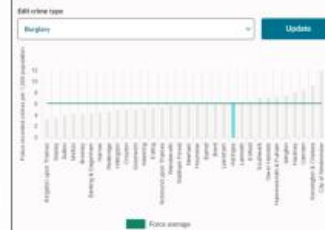
This chart compares the crime rate in your local area to the average crime rate across similar areas. It shows the total number of crimes over a twelve month period per thousand residents, for the crime type selected.

Where your area lies in relation to the red and green lines is more important than its rank among similar areas. If your area lies between the red and green lines, its crime rate is normal for the group. If your area lies above the red line, its crime rate is higher than normal for the group, and similarly, if your area lies below the green line, its crime rate is lower than normal. The areas shown in this chart are those that have been assessed to be most similar to your own. However, the circumstances within these areas do still vary and these variations can have an impact on the crime rates observed.

Source: ONS

Crime in Haringey compared with crime in other areas in the Metropolitan Police force area

In the year ending September 2024, the burglary rate in Haringey was higher than average for the Metropolitan Police area.



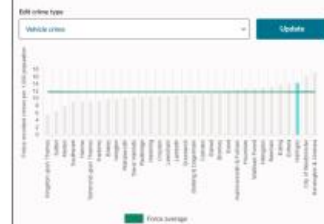
About this chart

This chart compares the crime rate in your local area to the average crime rate across the force area. It shows the total number of crimes over a twelve month period per thousand residents, for the crime type selected.

Source: ONS

Crime in Haringey compared with crime in other areas in the Metropolitan Police force area

In the year ending September 2024, the vehicle crime rate in Haringey was higher than average for the Metropolitan Police area.



About this chart

This chart compares the crime rate in your local area to the average crime rate across the force area. It shows the total number of crimes over a twelve month period per thousand residents, for the crime type selected.

Source: ONS

Crime in Haringey compared with crime in other areas in the Metropolitan Police force area

In the year ending September 2024, the criminal damage and arson rate in Haringey was lower than average for the Metropolitan Police area.



About this chart

This chart compares the crime rate in your local area to the average crime rate across the force area. It shows the total number of crimes over a twelve month period per thousand residents, for the crime type selected.

Source: ONS

- **Police.Uk** provides open source crime data, please see the Home Office crime classifications below as depicted on the Police.uk web site keeping in mind that not all crime takes place in the public realm.

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All crime: Total for all categories.

Anti-social behaviour: Includes personal, environmental and nuisance anti-social behaviour.

Bicycle theft: Includes the taking without consent or theft of a pedal cycle.

Burglary: Includes offences where a person enters a house or other building with the intention of stealing.

Criminal damage and arson: Includes damage to buildings and vehicles and deliberate damage by fire.

Drugs: Includes offences related to possession, supply and production.

Other crime: Includes forgery, perjury and other miscellaneous crime.

Other theft: Includes theft by an employee, blackmail and making off without payment.

Possession of weapons: Includes possession of a weapon, such as a firearm or knife.

Public order: Includes offences which cause fear, alarm or distress.

Robbery: Includes offences where a person uses force or threat of force to steal.

Shoplifting: Includes theft from shops or stalls.

Theft from the person: Includes crimes that involve theft directly from the victim (including handbag, wallet, cash, mobile phones) but without the use or threat of physical force.

Vehicle crime: Includes theft from or of a vehicle or interference with a vehicle.

Violence and sexual offences: Includes offences against the person such as common assaults, Grievous Bodily Harm and sexual offences.

This report gives recommendations. Please note that Crime Prevention Advice and the information in this report does not constitute legal or other professional advice; it is given free and without the intention of creating a contract or without the intention of accepting any legal responsibility. It is based on the information supplied and current crime trends in the area. All other applicable health, safety and fire regulations should be adhered to.

We strongly advise that independent third party certification is obtained from a manufacturer to ensure the fire performance of any of their door sets in relation to your needs and to ensure compliance with both current Building Regulations and the advice issued by the Department for Communities and Local Government on 22nd June 2017 following the Grenfell Tower Fire

	<ul style="list-style-type: none"> - Loss of privacy/overlooking - Loss of daylight and sunlight - Secure by Design concerns 	<p>unchanged from the extant permission</p> <p>Loss of privacy and overlooking is covered in the main body of the report. Nearby residential properties would not be materially affected by the proposal in terms of loss of privacy/overlooking as per the extant permissions.</p> <p>There are no daylight/sunlight and overshadowing concerns to neighbouring properties as the massing and scale of the proposal remains unchanged from the extant permissions</p> <p>The Secure by Design Officer does not object to the proposed development subject</p>
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	<ul style="list-style-type: none">- Concerns with additional traffic generation- The full impact on the nearby traffic flow needs to be fully understood- Highways and safety concerns	<p>to standard conditions requiring details of and compliance with the principles and practices of the Secured by Design Award Scheme</p> <p>The Transportation Officer has assessed these points and which have been covered in the main body of the report.</p> <p>With a smaller care/rehabilitation facility, there are expected to be fewer trips and reduced overall transportation demands compared to the extant permissions</p> <p>it is considered that the application is acceptable in transport and parking terms, and in terms of its impact</p>
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		on the public highway and the uncertainty in terms of parking stresses has been sufficiently addressed and includes a S106 contribution towards highways and traffic management measures.

