Appendix 3: Internal and External Consultee representations

<table>
<tr><th>Stakeholder</th><th>Comment</th><th>Response</th></tr>
<tr><td>Arboricultural Officer</td><td>That looks in order what was agreed a the PREAPP and application stage for Phase 3.

Can we have more details regarding the Category A apple tree.</td><td>A condition is recommended to address this.</td></tr>
<tr><td>Carbon Management</td><td><u>Carbon Management Response 17/07/2025</u>

In preparing this consultation response, we have reviewed:
• Energy Statement – Condition 79a – St. Ann’s Phase 3 prepared by Hodkinson (dated April 2025)
• Dynamic Overheating Report – St Ann’s Phase 3, prepared by Hodkinson (dated April 2025)
• Sustainability Statement – St Ann’s Phase 3, prepared by Hodkinson (dated April 2025) including a BREEAM Pre-Assessment
• Whole Life Cycle Carbon Emissions Assessment – St Ann’s Phase 3, prepared by Hodkinson (dated April 2025)
• Circular Economy Statement - St Ann’s Phase 3, prepared by Hodkinson (dated April 2025)
• Climate Change Adaptation Strategy – Condition 73 - St Ann’s Phase 3, prepared by Hodkinson (dated April 2025)
• Other relevant documents

1. Summary
The development achieves a reduction of 79% carbon dioxide emissions on site, under Part L 2021 with efficiency fabric energy performance, a low carbon communal heating system powered by ASHP, and 291.9 kWp of Solar PVs. This is supported in principle. Some clarifications must be provided with regard to the Energy Strategy and Overheating Strategy. Appropriate planning conditions will be recommended once this information has been provided.

2. Energy Strategy
The development achieves a reduction of 79% carbon dioxide emissions for residential and 36% for non-residential spaces on site, against Part L 2021. This represents an annual saving of approximately 225.3 tonnes of CO_2 from a baseline of 284.6 tCO_2/year.

London Plan Policy SI2 requires major development proposals to calculate and minimise unregulated carbon emissions, not covered by Building Regulations. The calculated unregulated emissions are: 54.87 tCO_2.

<table><tr><th>Residential</th><th>Part L 2013 (SAP10 carbon factors)</th><th>Part L 2021</th></tr></table></td><td>Pipework for condition 74 will be submitted prior to commencement as per the existing condition.

A BREEAM condition is recommended for the commercial unit.

Further meetings have been held to discuss the requirement for the additional overheating modelling and potential mitigation. These measures are considered to maximise efficiency but have not been required in previous phases, would be significant additional cost and work and would have any modest additional efficiency savings in are not considered necessary, especially given the highly</td></tr>
</table>

	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	331.6			283.1		
Be Lean	236	95.6	28.83%	236.5	46.5	16%
Be Clean	117.2	118.8	35.83%	73.7	162.8	58%
Be Green	71.4	45.8	13.81%	58.3	15.4	5%
Cumulative savings		260.2	78%		224.7	79%
Carbon shortfall to offset (tCO_2)	71.4			58.3		

Commercial unit	Part L 2013 (SAP10 carbon factors)			Part L 2021		
	Total regulated emissions (Tonnes CO_2 / year)	CO_2 savings (Tonnes CO_2 / year)	Percentage savings (%)	Total regulated emissions (Tonnes CO_2 / year)	CO_2 savings (Tonnes CO_2 / year)	Percentage savings (%)
Baseline				1.5		
Be Lean				1.0	0.5	33%
Be Clean				1.0	0.0	0%
Be Green				1.0	0.0	3%
Cumulative savings					0.6	36%
Carbon shortfall to offset (tCO_2)				1.0		

Actions:

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

Energy Use Intensity / Space Heating Demand

efficient measures already incorporated and benefit of nearly 1000 residential units and 60% affordable.

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

Building type	EUI (kWh/m^2/year)	Space Heating Demand (kWh/m^2/year)	Methodology used
Residential	43.07645141	4.58	SAP 10.2 Methodology
Small commercial unit	57.9	0.62	SBEM Methodology

Energy – Lean

The applicant has proposed a saving of 47.1 tCO_2 in carbon emissions (16% and 33% for residential and non-residential) through improved energy efficiency standards in key elements of the build. This goes beyond the minimum 10% and 15% respectively reduction set in London Plan Policy SI2, so this is supported.

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

	Residential new build	Commercial refurbishment
Floor u-value	0.13 W/m^{2}K	0.10 W/m^{2}K
External wall u-value	0.18 W/m^{2}K (0.20 W/m^{2}K to unheated spaces - corridors)	0.20 W/m^{2}K
Roof u-value	0.10 W/m^{2}K	0.14 W/m^{2}K
Door u-value	0.8 W/m^{2}K	Not provided
Window u-value	0.80 W/m^{2}K	1.00 W/m^{2}K
G-value	0.42 (south, east, west) 0.50 (north)	0.25 (indicative)
Air permeability rate	2.5 m^3/hm^2 @ 50Pa (flats) 3 m^3/hm^2 @ 50Pa (houses)	3 m^3/hm^2 @ 50Pa
Ventilation strategy	Mechanical ventilation with heat recovery (MVHR) + natural ventilation - SFP – 0.68-0.85 W/l/s Efficiency 86-87% for noise-affected dwellings - SFP – 0.61-0.66 W/l/s Efficiency 93% for all other	MVHR (0.90 W/l/s Specific Fan Power, efficiency 85%)
Thermal bridging	Accredited Construction Details; y-value 0.15 W/mK	
Low energy lighting	100% Energy efficient lighting Target Efficiency of 80 lm/W	A target LED lamp efficacy of 150 lm/W and a light output ratio of 1

Heating system (Be Lean)	Gas boilers with gross efficiency of 89.5%	ASHP heating COP of 2.86 and cooling COP of 8.5
FEE improvement	7% improvement, from 30.52 to 28.32 kWh/sqm	

Overheating is dealt with in more detail below.

Energy – Clean

The Be Clean strategy for Phase 3 of the St. Ann's development is to connect to a site-wide heat network, with provision for future connection to the off-site District Energy Network (DEN) originating from the Edmonton EcoPark Energy from Waste (EfW) facility.

Key elements of the strategy include:

- **Three energy centres** are planned across the site (Phases 1A, 1B/2, and 3) due to phasing and land ownership constraints. Phase 3 will include its own energy centre located in Block L2, with ASHPs on the roof of Blocks L1 and L2.
- **Primary heat source**: Air Source Heat Pumps (ASHPs) supplying 95% of demand, with electric boilers covering the remaining 5%.
- **SCOP**: A Seasonal Coefficient of Performance of 3.23 is assumed for the ASHPs.
- **Distribution**: All apartments will be connected via Heat Interface Units (HIUs), with no additional hydraulic separation planned.
- **Losses**: A distribution loss factor of 1.05 has been used in SAP calculations, consistent with earlier phases.
- **Future-proofing**: Space has been reserved in the Phase 3 energy centre to allow for future connection to the off-site DEN.

However, there are unresolved issues regarding the interconnection of the three phases:

- Drawing N15301-AWA-ZZ-00-DR-U-96018 appears outdated and implies reliance on the off-site network to interconnect the three phases, which contradicts the agreed approach.
- The developer is expected to deliver a single, unified on-site network across all phases, with a single point of connection to the off-site DEN (ideally at the northern edge of the site).
- Further details are required to demonstrate how the three phases will be interconnected and how the site-wide network will be designed to allow full supply from the future DEN.

This strategy is broadly acceptable in principle, but further clarification and updated drawings are required to ensure compliance with the Section 106 agreement and Conditions 28 and 74.

Action:

- Please submit an updated drawing and explanation showing how the energy centres across Phases 1A, 1B/2, and 3 will be interconnected by a single, developer-delivered site-wide heat network, including details of any hydraulic separation and

connections to existing buildings, in line with the commitments in the Section 106 agreement and Conditions 28 and 74.n updated drawing and accompanying explanation that clearly demonstrates how the energy centres across Phases 1A, 1B/2, and 3 will be interconnected to form a single, developer-delivered site-wide heat network.

Energy – Green

The report concludes that air source heat pumps (ASHPs) and solar photovoltaic (PV) panels are the most viable options to deliver the Be Green requirement for Phase 3. The strategy builds on the Be Clean approach, where ASHPs are already the primary heat source for the site-wide heat network, and further emissions reductions are achieved through the deployment of PV panels.

A total of 291.9 kWp of solar PV capacity is proposed across the Phase 3 roof spaces, with an estimated annual output of 191,195 kWh. The panels will be mounted at a 5–10° angle and oriented towards the south to maximise solar gain. An indicative roof layout has been provided in Appendix H of the Energy Strategy.

Individual ASHPs will supply space heating and hot water to the houses (COP of 3.6), while the commercial unit will be served by an ASHP with a COP of 5.0.

Actions:

- Please provide commentary on why the houses in Plot K and Block H do not have PV across their roof spaces. Providing solar PV on dwelling roofs is a common approach across Haringey and London, and this will be a missed opportunity to ensure that the operational energy use and their emissions can be reduced for occupants.
- Please confirm the thermal storage capacity proposed for Block L2 (Phase 3 energy centre), including any buffer tanks or hot water storage that will support the operation of the ASHPs and the site-wide network.

Energy – Be Seen

The metering strategy will be further developed at detailed design stage. The total unregulated energy demands have been estimated at 561,825kWh/year from residential, non-residential and landlord supplies.

Actions:

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

3. Carbon Offset Contribution

A carbon shortfall remains. The remaining carbon emissions will need to be offset at £95/tCO_2 over 30 years with Part L 2013, and this will be dealt with via the relevant planning obligations in the S106.

4. Overheating

The applicant has undertaken a dynamic thermal modelling assessment in line with CIBSE TM59 using TM49 weather files. The cooling hierarchy has been followed in the design.

Summary of TM59 Results

- Weather file used: DSY1 2020s, high emissions, 50th percentile
- Modelled units: 40 dwellings and 3 communal corridors
- Compliance: All units and corridors pass TM59 Criteria A and B
- Mechanical mitigation: Air tempering applied to Plot O houses due to noise constraints
- Passive measures:
    - Solar control glazing (g-value 0.42 east/south/west, 0.50 north)
    - External shading via balconies and deep reveals ranging from 85mm to 215mm
    - Additional shading provided by louvred shutters to the ground floors and a few specific east facing windows in Plot N;
    - MVHR with summer bypass mode (up to 90 l/s for apartments, 110 l/s for houses)
    - Secure openable windows and louvred shutters for ground floor units

Ventilation Strategy

- MVHR with summer bypass
- Openable windows with inward opening design
- Lockable louvred shutters for secure night ventilation
- Corridors ventilated via AOV system (0.5 ach)

Cooling Strategy

- Passive-first approach
- Air tempering (cooling coil bolt-on to MVHR) for noise-affected units
- No comfort cooling required elsewhere

Results are listed in the table below.

Domestic: CIBSE TM59	Predominantly naturally ventilated		Predominantly mechanically ventilated	Number of corridors pass
	Criterion A (<3% hours)	Criterion B for bedrooms (less than 33 hours)	Number of habitable rooms pass (<3% hours)	

DSY1 2020s (no window restriction issues)	All pass		All pass
DSY1 2020s (acoustically impacted only)	Modelled but not counted by applicant	Not modelled	
DSY2 2020s	Modelled but not counted by applicant	Not modelled	4 pass
DSY3 2020s	Modelled but not counted by applicant	Not modelled	All pass
DSY1 2050s	Modelled but not counted by applicant	Not modelled	0 pass
DSY1 2080s	Modelled but not counted by applicant	Not modelled	0 pass

Overheating Actions:

- Specify the shading strategy, including: technical specification and images of the proposed shading feature (e.g. overhangs, Brise Soleil, external shutters), elevations and sections showing where these measures are proposed.
- Please confirm the mitigation measures modelled for the results reported in Table 2: TM59 overheating results for dwellings (assuming no window opening constraints) under DSY1 2020s.
    - If MVHR has been modelled to show passing under no restriction's scenarios, this needs to be removed from the modelling.
    - A step-by-step approach is to be undertaken in line with the Cooling Hierarchy as set out in the Haringey Overheating guidance.
- Please confirm if the MVHR is modelled for the results reports in Table 6: TM59 overheating results for swelling with external shading devices.
    - If MVHR has been modelled, please remove it and model only the passive measures first.
    - A step-by-step approach is to be undertaken in line with the Cooling Hierarchy as set out in the Haringey Overheating guidance.
- Confirm if all dwellings with bedrooms facings south, south-west and south-east has maximised passive design measures to mitigate the overheating risks arising from solar gains, with external shadings for eg: louvred shutters.
- Please set out the results in numbers as a summary, based on the number of habitable rooms pass out of the total number modelled.
- Specify the active cooling demand (space cooling, not energy used) on an area-weighted average in MJ/m^2 and MY/year? Please also confirm the efficiency of the equipment, whether the air is sourced from the coolest point / any renewable sources.

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

5. Sustainability

Policy DM21 of the Development Management Document requires developments to demonstrate sustainable design, layout and construction techniques. The sustainability section in the report sets out the proposed measures in line with the One Planet Framework. The key principles are: people focused; place-led; new benchmark for housing; highly sustainable design; improved health and wellbeing; community growing and gardening; and child-friendly public realm. It covers all sustainability aspects including transport, equity and local economy, health and wellbeing, materials and waste, water consumption, flood risk and drainage, sustainable food, biodiversity, climate resilience, energy and CO2 emissions and landscape design.

BREEAM New Construction Pre-Assessment
The applicant has prepared a BREEAM Pre-Assessment Report for the commercial unit. An 'Excellent' rating should be achievable according to the Pre-Assessment. The tracker assessed that a score of 74.21% is achievable, which is an improvement to the 73.04% score at outline stage.

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

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

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

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

Whole Life-Cycle Carbon Assessments
Policy 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 RESIDENTIAL	Embodied carbon rating (Industry-wide)
Product & Construction Stages Modules A1–A5 (excl. sequestration)	556 $kgCO_2e/m^2$	Meets GLA benchmark (<850 $kgCO_2e/m^2$) but exceeds the aspirational target (<500 $kgCO_2e/m^2$)	Modules A1–A5 achieve a band rating of 'D', not meeting the LETI 2020 Design Target

Use and End-of-Life Stages Modules B–C (excl. B6 and B7)	273 $kgCO_2e/m^2$	Meets GLA target (<350 $kgCO_2e/m^2$) and aspirational benchmark (<300 $kgCO_2e/m^2$)	
Modules A–C (incl. sequestration, excl. B6 & B7)	816 $kgCO_2e/m^2$	Meets GLA target (<1200 $kgCO_2e/m^2$), but not the aspirational benchmark (<800 $kgCO_2e/m^2$)	Modules A1–C4 (incl. sequestration) achieve a letter band rating of 'D', not meeting the LETI 2030 Design Target
Modules A–C incl. operational emissions (B6 & B7)	1,086 $kgCO_2e/m^2$	N/A	
Carbon sequestration	–13 $kgCO_2e/m^2$	N/A	

The highest embodied carbon in Modules A1–A3 is attributed to construction materials (43%), with further emissions from site operations (7%) and transport (1%). Operational energy (regulated and unregulated) accounts for 25% of total emissions, while 21% of emissions are from in-use stages (B1–B5), primarily due to material replacement over the 60-year study period.

The design has incorporated lean principles to reduce upfront embodied emissions, including:

- Use of steel with 97% recycled content (saving 60 $kgCO_2e/m^2$)
- Pre-fabricated balconies (saving 10 $kgCO_2e/m^2$)
- 10% cement replacement in concrete (saving 12 $kgCO_2e/m^2$)
- Energy-efficient fabric and connection to a heat network using ASHPs (saving 473 $kgCO_2e/m^2$ over 60 years)

Further opportunities to reduce emissions include reducing non-load bearing walls, using durable façade materials, specifying pre-cast concrete slabs, and exploring innovative cement mixes with higher limestone content.

The WLCCE is compliant with GLA Policy SI2 and has been prepared using One Click LCA software in line with BS EN 15978 and RICS guidance. The assessment will be updated post-construction with product-specific data.

Circular Economy

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

The Circular Economy Statement for Phase 3 builds on the principles established in the outline consent and provides a detailed strategy for implementation. The following principles have been embedded into the design:

- Building in layers to allow for maintenance, replacement, and future adaptability.
- Designing out waste through standardisation, modular construction, and lean design.
- Designing for longevity, with durable materials and robust detailing.
- Designing for adaptability and disassembly, including mechanical fixings and accessible services.
- Using systems and materials that can be reused or recycled at end-of-life.

Key commitments include:

- A minimum of 95% of non-hazardous construction and demolition waste to be reused or recycled.
- Targeting 20% recycled content by value in construction materials (currently 18.46%).
- All timber to be FSC/PEFC certified.
- Operational waste targets of 65% (residential) and 75% (non-residential) recycling by 2030.
- Provision of adequate refuse and recycling storage, including food waste, across all units.
- Implementation of a Site Waste Management Plan and Operational Waste Strategy.

The report also outlines a detailed End-of-Life Strategy, including the use of the One Click LCA Circularity Tool, which estimates that 53.9% of materials can be returned to construction at end-of-life. Material passports and a disassembly manual will be developed post-construction to support future reuse and recycling.

The Circular Economy Statement includes a Bill of Materials, Recycled Content Calculations, and a Pre-Demolition Audit (Appendices B and C), which estimate that 1,155 tonnes of materials (5%) are suitable for reuse, with 98% of demolition waste expected to be diverted from landfill.

This is a comprehensive and policy-compliant approach that demonstrates a strong commitment to circular economy principles, with further detail to be provided at the post-construction stage.

6. Planning Conditions

To be secured (with detailed wording TBC)

- Energy Strategy
- Overheating (Domestic)
- Overheating (Commercial)
- BREEAM Certificate

<u>Carbon Management Response 14/08/2025</u>

In preparing this consultation response, we have reviewed:

- Energy and Carbon Response prepared by Lambert Smith Hampton (dated Aug 2025)
- Response to Overheating actions prepared by Hill Residential Limited (dated Aug 2025)
- GLA Carbon Emission Reporting Spreadsheet Part L 2013
- GLA Carbon Emission Reporting Spreadsheet Part L 2021
- Other relevant documents

1. Summary

The applicant has addressed the previously raised action points on Energy and Overheating and submitted the GLA carbon emission reporting spreadsheets for both Part L 2013 and Part L 2021 modelling. The energy strategy aligns with the hybrid application and will be monitored through Section 106 clauses and planning conditions secured as part of the hybrid consent.

The proposed overheating strategy is satisfactory in principle. Key measures include:

- Fully inward-opening windows to enable natural ventilation.
- Strategic placement of most bedrooms away from direct solar gains.
- Passive shading through overhangs and deep window reveals.

However, the development still includes several single-aspect units and bedrooms with south, south-west, and west-facing windows, which are at higher risk of overheating due to direct solar exposure. To mitigate this, additional passive shading measures are recommended in line with the London Plan Cooling Hierarchy, which would also help reduce cooling demand and associated energy use for better energy security of future occupants.

The submitted overheating assessment does not fully follow the Cooling Hierarchy. While all units pass the DSY1 2020s weather files, this is achieved primarily through mechanical ventilation with boosted airflow rates, rather than prioritising passive design measures first. This approach may lead to higher energy use and costs for future occupants and is against the Cooling Hierarchy.

Notably, the development's Energy Use Intensity (EUI) is approximately 30% higher than the GLA benchmark, reinforcing the need for passive cooling strategies such as external shading to reduce energy demand and improve resilience to heatwaves.

To ensure the development is resilient to future climate conditions and supports energy security for occupants, it is recommended that:

- A planning condition be secured requiring a revised overheating assessment prior to commencement of above-ground works.
- The revised assessment should address the concerns outlined above and demonstrate compliance with the London Plan Cooling Hierarchy, with a focus on passive mitigation measures.

2. Energy:

Be Clean

The applicant is required to demonstrates how the energy centres across Phases 1A, 1B/2, and 3 will be interconnected to form a single, developer-delivered site-wide heat network. This will be covered by Condition 74.

Be Green

The submitted roof plans show Solar PV has been maximised on the roofs of Plot L, M and N, while no PV is proposed for houses on Plot K and O. As per the applicant, Solar PV had been considered but was not included as a Be Green measures for houses to avoid burdens in terms of maintenance and scaffolding required for it, to future homeowners. This commentary is noted. However, providing PV on dwellings is a common approach across Haringey and London, and this will be a missed opportunity to ensure that the operational energy use and their emissions can be reduced for occupants.

The applicant confirmed 5 thermal storages with 8.000 L each (totally 40.000L).

Carbon Offset Contribution

A carbon shortfall remains. The remaining carbon emissions will need to be offset at £95/tCO_2 over 30 years with Part L 2013, and this will be dealt with via the relevant planning obligations in the S106.

Overheating

The applicant has submitted a technical note to address the overheating queries provided in the earlier response.

Shading Strategy:

Elevational drawings have been provided, although detailed specifications of the shading elements are not yet available. The applicant has committed to submitting these details at the detailed design stage, which should be secured via a planning condition requiring submission as part of the revised overheating assessment.

Cooling Hierarchy:

The strategy includes Mechanical Ventilation with Heat Recovery (MVHR) as part of the overheating mitigation measures. While MVHR may be acceptable as part of the final mitigation strategy, the current assessment does not adequately demonstrate how passive measures have been maximised prior to the introduction of mechanical solutions. This approach does not align with the London Plan Cooling Hierarchy, which prioritises passive design interventions.

The applicant has confirmed that MVHR was included in all modelling scenarios. However, passive measures—such as external shading, shutters, and brise soleil—should be prioritised, especially for bedrooms facing south-west or those with high solar exposure. To properly assess the effectiveness of passive design, the baseline scenario of the TM59 Overheating Assessment should exclude MVHR. While MVHR may be retained in the final strategy to meet Part F ventilation requirements, the applicant must first demonstrate that passive measures have been fully explored and optimised.

https://www.haringey.gov.uk/sites/default/files/2024-05/summary_overheating_planning_application_requirements.pdf

The applicant's assertion that bedrooms facing south, south-west, and south-east meet TM59 criteria without additional shading is not accepted, as MVHR was used in all scenarios to achieve compliance. Passive measures must be prioritised in accordance with the Cooling Hierarchy.

In summary, the proposed overheating strategy is satisfactory in principle. Key measures include:

- Fully inward-opening windows to enable natural ventilation.
- Secure openable windows and louvred shutters for ground floor units
- Solar control glazing (g-value 0.42 east/south/west, 0.50 north)
- External shading via balconies and deep reveals ranging from 85mm to 215mm
- Additional shading provided by louvred shutters to the ground floors and a few specific east facing windows in Plot N;
- MVHR with summer bypass mode (up to 90 l/s for apartments, 110 l/s for houses)

However, the submitted overheating assessment does not demonstrate compliance with the London Plan's Cooling Hierarchy and lacks evidence that passive design measures have been maximised prior to reliance on mechanical ventilation and cooling.

Given the window opening constraints of the site, the TM59 criteria for predominantly mechanically ventilated dwellings apply (assuming windows remain closed). However, in line with Energy Assessment Guidance 2022 (Section 8.10), applicants must submit two separate overheating scenarios:

1. One assuming openable windows.
2. One assuming closed windows.

This dual-scenario approach ensures that passive measures and façade design are optimised regardless of site constraints.

<u>Overheating Actions:</u>

- Naturally ventilated scenario – To demonstrate passive mitigation measures have been maximised regardless of the constraints posed by the site. Please undertake TM59 overheating assessment with passive measures introduced in steps for dwellings (assuming no window opening constraints) under DSY1 2020s.
    - MVHR should not be modelled in the baseline and passive mitigation measures stage, and should be only introduced after exploring all passive overheating mitigation measures such as external shutters, shadings, etc.
- Mechanically Ventilated Scenario for Units with windows opening constraints - Please undertake TM59 overheating assessment with passive measures introduced in steps for dwellings under DSY1 2020s.

	- MVHR should not be modelled in the baseline and passive mitigation measures stage, and should be only introduced after exploring all passive overheating mitigation measures such as external shutters, shadings, etc. - Report results of the dynamic modelling in line with the TMTM59 compliance criteria, clearly setting out the baseline scenario and additional modelled scenarios to test mitigation measure(s) required to pass the overheating assessment. - Baseline scenario - Baseline scenario + passive mitigation measure 1 - Baseline scenario + passive mitigation measure 1 + passive measure 2, etc. - All dwellings with bedrooms facings south, south-west and south-east must maximise passive design measures to reduce the solar gains for mitigating the overheating risks, with external shadings for eg: louvred shutters. We recommend that a planning condition is included to undertake an overheating assessment for the commercial unit, 6 months prior to occupation. Planning Conditions Additional conditions should be secured. *Overheating Risk (Domestic Phase 3)* *Prior to the above ground commencement of development, a revised overheating model and report shall be submitted to and approved by the Local Planning Authority. The model will assess the overheating risk in line with CIBSE TM59 (using the London Weather Centre TM49 weather DSY1-3 files for the 2020s, and DSY1 for the 2050s and 2080s) and demonstrate how the overheating risks have been mitigated and removed through design solutions. These mitigation measures shall be operational prior to the first occupation of the relevant phase hereby approved and retained thereafter for the lifetime of the development. Air conditioning will not be supported unless exceptional justification is given.* *This report will include:* - *Natural ventilated scenario - to demonstrate passive design measures have been maximised regardless of the constraints posed by the site. Modelling should introduce passive measures first before introducing MVHR in line with the Cooling Hierarchy;* - *Mechanically Ventilated Scenario for Units with windows opening constraints with passive measures introduced in steps in line with the Cooling Hierarchy;* - *Incorporate further passive design measures (including at least acoustic mitigation and external shading) to reduce the overheating risk before applying any mechanical cooling solutions especially to bedrooms with windows facing south, south-west and west;;* - *All dwellings with bedrooms facings south, south-west and south-east must maximise passive design measures to reduce*	

	the solar gains for mitigating the overheating risks, with external shadings for eg: louvred shutters. - *Specifications of the passive design measures incorporated within the scheme in line with the Cooling Hierarchy.* - *Confirmation who will be responsible to mitigate the overheating risk once the development is occupied.* - *Modelling and feasibility of measures that form part of the retrofit plan to mitigate the future risks of overheating by confirming that the retrofit measures can be integrated within the design (e.g., if there is space for pipework to allow the retrofitting of cooling and ventilation equipment) and include any replacement / repair cycles and the annual running costs for the occupiers;* *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.* *<u>BREEAM Certificate (Commercial Units Phase 3)</u>* *Prior to the fit out of this unit and in accordance with the submitted pre-assessment for the commercial unit in Phase 3, and prior to fit-out of this unit, 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 "Excellent" outcome (or equivalent), subject to certification by BRE.* *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.*	
Conservation	There is no objection from the heritage conservation perspective to the proposed detailed scheme related to phase 3 of the wider redevelopment of the St Ann's Hospital site.	Noted – Conservation have been involved through the preapp process and previous phases.

Design	<u>Summary</u> This application is for reserved matters approval for the final substantial portion of the development that was granted outline approval in a previous hybrid permission and for which the other outline portion was granted reserved matters approval in the previous planning permission. The proposals are in accordance with the Design Code and Masterplan previously approved, that will ensure its compatibility with the detailed elements previously approved. Design officers are confident this proposal will make a significant contribution to what will rapidly become a major new neighbourhood characterised by elegant, cooly detailed, durable and robust residential buildings framing retained heritage buildings from the former hospital housing community and business uses, amidst spectacularly high quality landscape features. The homes created in this phase will be at least as good quality, attractive, durable and supporting fulfilling, sustainable living, as those in the previous permissions. Design quality is high, and has been commended by the council's independent, objective, expert Quality Review Panel, with all concerns expressed by the panel resolved to design officers' satisfaction. <u>Design Code</u> The Design Code is an Approved Document, giving it greater weight in considering this and future Reserved Matters applications than the Design & Access Statement. As such it is crucial to ensuring that future phases will be built out to at least as good quality as the initial phases for which detailed planning permission was granted. In general, officers consider the Design Code is a really high-quality document that promises to be extremely powerful and useful in supporting and protecting high quality design and a coherent design across the development, tying the later phases, only previously applied for in outline, to the earlier phases approved previously in detail. The document is structured with Site Wide Codes, Landscape Codes and Architectural Codes. The general principles within the Site Wide codes are excellent, placing some of the more detailed Conservation Area principles within the Site Wide codes, especially crucial views, giving them a welcome prominence. To avoid them being forgotten in the Architectural and Landscape Codes, there is cross referencing throughout. Codes are described as either must or should be carried out. Unlike many other Codes, may is never used, to give greater certainty, but reasonable flexibility in implementing the outline portion. Officers consider the most crucial elements are definitive. The Design Code is particularly strong on landscaping, both hard and soft, with a long and detailed section on Landscape and Public Realm coding, to reflect and help to implement the overall intention for the development to be led by the green and natural landscape, and to be designed around the importance placed on preserving key existing trees and areas of landscaping within the site.	Noted – Design officer has worked closely with the applicant team in the refinements of what is an exemplary design in-keeping with previous phases.

	<u>Detailed Design</u> Much of this phase closely follows the detailed design of previously approved phases, but where necessary have been adapted to different particular locations and/or updated to comply with the latest regulations and guidance. The mansion blocks facing the Peace Garden consciously reflect those in the first phase, but have been modified to provide dual stair access where their height requires. Care has also been taken to respond to QRP concerns as much as possible, including ensuring natural light reaches communal corridors and that communal entrances are as welcoming as possible. The lower rise mansion blocks behind and the townhouses to their east and south are identical to those approved in the first and second phases, but the block of deck-access flats over maisonettes in the middle of the row of eastern townhouses in Plot N are unique to this phase. These have responded to design officer and QRP concerns regarding their relationship to the hospital and that their "rear" will be highly visible with a series of design refinements to reduce the extent of access balconies, with their lift and stair cores giving onto enclosed lobbies with windows, and introducing additional vertical brick columns for give the remaining access balconies a more elegant elevational composition balanced between horizontal and vertical elements. Finally, significant work has been done by the applicants and officers to refine, enrich, and embellish the townhouses in the northern part of this site, in Plots O1 and particularly O2, reflecting their occupying the most visible location in the entire development, forming the key corner and gateway from the open space in front of the retained hospital as well as sitting within the boundary of the St Ann's Conservation Area, amongst heritage assets of retained buildings and walls, and alongside St Ann's Road, as well as sitting in the view corridor of the striking local view, identified by design officers and the applicants' heritage consultants early in the design of the masterplan, from the northern edge of the housing development to the church spire of St Ann's Church. Therefore despite these townhouses being restricted to two storeys to preserve the view, and therefore having potentially lacked the "heft" to hold their key corner/gateway location, their designs, in particular that of the special design of the easternmost end house, has been enhanced to face in three directions and in particular to feature a striking raised dormer window over its stairs. This is considered to produce a worthy design to enhance and demarcate this important location whilst still providing a high quality townhouse offering a great living experience, as will all the other new homes proposed for this development.	
Noise	I have reviewed the noise assessment and in my opinion is agreeable on what the report details, and do not have any comments to make.	Noted.
Refuse Management	The proposed Refuse Strategy for Phase 3 of the development is broadly compliant with the requirements set out in the *Haringey Local Plan - Sustainable Design & Construction SPD*. The inclusion of	Signage will be provided through condition.

	dedicated refuse and recycling stores at ground floor level for each apartment and maisonette core is welcomed, as is the integration of domestic refuse storage within the front defensible space for houses. Key strengths of the strategy include: • **Proximity to collection points**: The majority of refuse stores are located within 10 metres of the highway, which aligns with best practice for drag distances and facilitates efficient collection. • **Accessibility**: Step-free access via flush or dropped kerbs is provided to all refuse stores, supporting inclusive design and ease of use for all residents. • **External access**: All stores are externally accessible, which is consistent with the agreed fire strategy and supports operational efficiency. To further strengthen the strategy, it is recommended that: • Clear signage and wayfinding be incorporated to ensure residents and collection crews can easily locate refuse stores. • Adequate ventilation and pest-proofing measures are confirmed in detailed design stages. • Ongoing management and maintenance plans are developed to ensure long-term cleanliness and usability of the refuse areas. Overall, the strategy demonstrates a thoughtful approach to waste management and is in line with Haringey's sustainability and accessibility objectives.	Ventilation is a requirement for Building Regulations but is referenced as an informative. The maintenance will be undertaken by site management
Sustainable Drainage (SuDS)	**Comments received 23/06/2025:** Having reviewed the applicant's submitted Flood Risk Assessment and Drainage Report document reference number 4310-MHT-ZZ-XX-T-C-0001 Issue P02 – 11 dated April 2025 as prepared by Meinhardt consultant for the reserved matter application, we have following concerns: 1. The proposed discharge rate of 15 l/s for all rainfall events is noted. However, we require that all surface water discharges be limited to the Greenfield runoff rate, including consideration of a 40% allowance for climate change across all rainfall events. It would be good to review your discharge strategy accordingly. Additional storage may be necessary to accommodate more extreme events without increasing runoff rates. 2. As part of the Reserved Matters application, a full suite of rainfall simulations is required. This must include, simulated storms over a 7-day period (not just 1 day) 3. The current Micro-Drainage model shows significant flooding during the 1 in 100 year + 40% climate change event, which is not acceptable. Therefore, please explore options such as providing additional storage capacity within the site and/or upsizing drainage pipes to increase conveyance capacity 4. We also require a clear indication of overland flow paths as generated by the proposed drainage scheme. Please provide a	A meeting was held on 22/08/2025 where the flow rates were discussed and it was agreed that whilst everything seemed to be acceptable there is a need for all results to be collated. Further information was submitted on 28/08/2025 but requires further review. Accordingly, it is considered that a condition be applied so that this can be reviewed.

	diagrammatic plan showing these routes and confirming that overland flows are directed away from buildings and sensitive infrastructure. **Follow up comments received: 18/08/2025:** Unfortunately, the applicant hasn't responded to the specific points we raised. Instead, they've provided justifications, claiming that Phase 3 discharges into Phase 1, for which the discharge rate has already been agreed. They're also disputing the rainfall parameters used and haven't demonstrated sufficient storage to account for the flood risk. Given the complexity and the time elapsed since our original response in June, we'll need to revisit the entire submission, including our comments on Phase 1, to ensure a thorough review. This will take a bit of time, I am afraid.	
Transportation	This RMA application is for Phase 3 of the St Anns hospital residential redevelopment, for appearance, landscaping, layout and scale. Transportation have reviewed the submitted document and are primarily focussing on the layout aspects of this REM application. The St Anns site redevelopment is for the provision of 995 residential units across all phases. Phase 3 of the site is located to the eastern side of the plot, and includes Plots K, L, M, N, O1 and O2. 291 units are included. <u>Layout and access arrangements</u> From the transportation perspective, the outline consent did include a number of elements of the development in detail, including the internal road and footways, along with alterations and connections to the existing public highway and site boundaries to enable the provision of new vehicular, pedestrian and cycle accesses, so these have already been consented. A north – south primary street runs within Phase 3 and connects to St Anns Road and to the southern part of the overall development site, and a secondary east west road connects to the centrally located peace garden and to the north side of the site and access to St Anns Road. The internal road layouts and junctions connecting to the existing highway network are in accordance with the approved Parameter Plans, following the masterplan proposals and completing the perimeter two-way primary access street within the development. The internal development road layout is as per the parent/outline consent, providing the two way primary (loop) and one way with a contraflow cycle facility secondary roads, the only change since the outline consent is the addition of one parking space in a location where originally three continuous spaces were to be provided, refinements to vehicle tracking checking of the design has enabled the addition of another on street space. The two way primary road is to be 5.5m wide as a minimum and the single direction secondary roads that will include a contraflow cycling facility 3.9m wide (minimum). All footways	Noted. A condition to secure delivery of requisite cycle stores is recommended.

	are to be 2.0m wide (minimum). The road and footway widths are confirmed within the design code and in the original design and access statement. Cycle Parking arrangements (reference condition 66) The submission includes the Phase 3 cycle parking provision document as produced by Markides Associates. This includes full details of the long and short stay cycle parking for residential units, non-residential floor area and for visitors. The long stay provision for the houses and maisonettes (34 spaces) will be within the rear gardens in secure weatherproof stores, there will be internal long stay stores for the flats (465 in total), plus 22 short stay associated with the residential units within the public realm across phase 3, and 3 long stay and 14 short stay for the non-residential land uses within this phase, located around phase 3 with The quantum meets the requirements of the London Plan and the proposed arrangements meet the requirements of the London Cycle Design Standards with respect to the provision of larger spaces (5%), 20% of spaces utilise Sheffield stands, and 75% utilise a two tier system, with appropriate manoeuvring space within the cycle stores. As submitted the proposed cycle parking arrangements are acceptable. Car parking management plan (reference condition 77) The on street car parking provision meets the quantum consented within the original application with 49 spaces to be provided. This includes the following; • 32 standard spaces (6.0m x 2.0m) • 8 blue badge spaces (6.6m x 2.0m) • 5 spaces able to be converted to 6.6m x 2.0m blue badge spaces (initially will be standard and there is the ability to extend and redesignate as required) • 2 visitor blue badge spaces (6.6m x 2.0m) • 2 non-residential visitor car parking spaces (6.0m x 2.0m) • 2 car club spaces (6.0m x 2.0m) All parking spaces will have an EVCP facility, 20% will be provided as active and the remaining 80% will be passive able to be brought into use as required in the longer term. It is noted that the potential blue badge provision of 5% is lower than the London Plan requirement of the ability to provide 10%, however this level of provision has been accepted with the earlier phase applications, and at present blue badge holders make up 2.9% of Haringey's population from census figures. The CPMP also outlines how development parking will be allocated and managed. No spaces will be sold, they will be leased and arrangements reviewed, the priority will be towards providing for the larger and family sized units. there will also be active enforcement and management of the parking provision within the development.	

As submitted the Car parking management plan is acceptable to Transportation.

Delivery and servicing Plan

A standalone DSP document is included within the submission, this details the use of a specific commercial loading bay slightly to the south of Block M. 10 vehicles per day are predicted visiting to use this facility.

With regards residential deliveries and servicing, it is intended for these vehicles (predicted at 49 vehicles per day) to utilise parking spaces available and potentially the commercial loading bay to park and dwell. The vast majority of visiting delivery and service vehicles are expected to be vans and Light goods vehicles.

Arrangements can be put in place to temporarily suspend parking bays for removals lorries and larger goods vehicles, the management of delivery and servicing will be by the travel plan co-ordinator.

Otherwise the DSP provide commentary on how commercial occupiers will be expected to follow the principles of the DSP as afar as possible, including timings outside of the peaks, notifying arrival times, and liaising as necessary with occupiers and the estate management team.

Swept path plots have been provided for refuse/recycling collection vehicles that will collect from the street. With the relatively low parking included and accordingly low car ownership predicted, this is not expected to be an issue with regards congestion. The swept path plots appear fine.

Residential Travel Plan

A Travel Plan document has been submitted for Phase 3, which incorporates the earlier plans for the earlier phases, thus producing a site wide residential travel plan. The scope and content of this document are appropriate and align with the earlier phase documents.

The plan includes details of connections to public transport services and local facilities, how pedestrian and cyclist access and connectivity to and from the development twill be improved, along with details of the car club and cycle parking arrangements to be provided. Two car club parking spaces are to be provided within phase 3 as part of the overall car club provision for the site as required with the S106 for the main original consent.

There is commentary on management and administration of the travel plan and on how mode shares will be set post occupancy surveys, there is reference to the wider London Plan targets for 80% of all journeys to be by sustainable and active modes, which is expected from the outset.

Summary

	This RMA application relates to phase 3 of the St Anns hospital redevelopment. From the transportation perspective, the proposed access and transport arrangements accord with the main/parent consent, and are acceptable to Transportation, as are the submissions relating to conditions 66 and 77.	

External	Comment	Response
Environment Agency	Environment Agency Position Based on a review of the submitted information, we have no comments on this reserved matters application, or the discharge of conditions 61, 62, 63, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 77, 79 and 80. Please continue to consult us on applications with regard to reserved matters and discharge of conditions for outline permission HGY/2022/1833, in which we responded to under references NE/2022/134751/01, NE/2022/134751/02 and NE/2022/134751/03 due to the site being situated on Source Protection Zone 1 and the presence of land contamination.	Noted.
Hackney Council	No objection.	Noted.
Historic England (GLAAS)	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. 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/ 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. 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.	GLAAS have provided comments on the hybrid permission and conditions are attached for investigations in the original hybrid permission decision notice.
HSE	Scope of consultation 1.1. The above application relates to the approval of Reserved Matters in respect of appearance, landscaping, layout and scale relating to Phase 3 associated with the outline component of planning permission HGY/2022/1833. Access is not a reserved matter under consideration in this application. 1.2. The development plots include: • Plot K Houses (3-storeys) • Courtyard Plots L & M (5-8 storeys) • Plot N Houses & Maisonettes (3-4 storeys) • Plot O Houses (2-3 storeys)	Noted. The information has been sent to the applicant and an informative is included with advice for Gateway 2 submission.

1.3. The Design and Access Statement (Executive Summary) states: “This second Reserved Matters Application (RMA 2) seeks detailed approval of the appearance, landscaping, layout and scale of Phase 3 of the outline component of the St Ann's New Neighbourhood Masterplan. This covers Plots K to O of the illustrative masterplan, submitted as part of the Hybrid Application.”

1.4. HSE has assessed the proposed buildings that meet the height threshold for relevant buildings. In so doing, HSE has referenced the storey heights detailed in the Fire Strategy Reports and not the stated building height(s) in the fire statement. Accordingly, Plots L 1, 2, and Plots M 1, 2 are relevant buildings. The other buildings are located within the curtilage of relevant buildings, and HSE has included them as part of this assessment.

1.5. Hybrid Planning Approval of the St Ann's New Neighbourhood Masterplan was granted in July 2023.

1.6. The fire statement dated 31/05/2025 states that the adopted fire safety design standard is BS 9991. HSE has assessed this application on that basis. It is noted the Fire Strategy Reports provided were helpfully detailed and informative.

Previous consultation
1.7. HSE received a consultation request on 18/07/2022 for the aforementioned address (planning reference: HGY/2022/1833 – detailed for Phase 1A) in relation to the outline application, and responded on 19/08/2022, under the HSE reference pgo-1620, with the headline: ‘Content’.

Current consultation
1.8. HSE received this consultation request on 02/06/2025 in relation to the reserved matters applications. For the avoidance of doubt, this substantive response is in relation to the reserved matters application.

Plot L
1.9. Paragraph A3.1 of the Fire Strategy Report (Plot L) states: “The proposed development of Plot L is two multi-storey residential blocks, L1 & 2 and L3, having stories of eight and six respectively, whilst also featuring an array of ancillary spaces and a courtyard in between the two blocks. Building L1 & 2 are >900m2 and therefore afforded 2 Firefighting shafts.” Additionally, paragraph C.6.4 of the same document states: “Building L1 & L2 is to be afforded 2 Firefighting shafts due to the floor area >900m2.” Plot M

1.10.Paragraph A3.1 of the Fire Strategy Report (Plot M) states: “The proposed development of Plot M are two multi-storey residential blocks, M1 & 2 and M3, having stories of fiveseven and six respectively, whilst also featuring a commercial unit and an array of ancillary spaces and a courtyard in between the two blocks. Building M1 & 2 are >900m2 and therefore afforded 2

	Firefighting shafts." Additionally, Paragraph C.6.4 of the same document states: "Building M1 & 2 is to be afforded 2 Firefighting shafts due to the floor area >900m2." 1.11.HSE welcomes the provision of two firefighting shafts in buildings L1, L2, M1 and M2. 1.12. Following a review of the information provided in the planning application, HSE is content with the fire safety design as set out in the project description, to the extent it affects land use planning considerations. 2. Supplementary information The following information does not contribute to HSE's substantive response and should not be used for the purposes of decision making by the local planning authority. Smoke ventilation system – Plot L and M 2.1. Paragraph 3.5.1 (L1 & L2) of the Fire Strategy Report (Plot L) states: "A performance based mechanical extract shaft is to be provided in the corridors allowing for the smoke to be extracted and removed from the corridor… CFD is to be used to verify the performance of the mechanical smoke control system." 2.2. Paragraph 3.5.1 (M1&2) of the Fire Strategy Report (Plot M) states: "A performance based mechanical extract shaft is to be provided in the corridors allowing for the smoke to be extracted and removed from the corridor…. CFD is to be used to verify the performance of the mechanical smoke control system." 2.3. Accordingly, the above is noted and it will be for the applicant to demonstrate that the means of escape are appropriate at later regulatory stages. Hydrants 2.4. Regarding the 3x fire statements provided, the response to the question about the reliance on the use of existing hydrants and whether they are currently usable / operable (fire statement, section 13) is given as "don't know". Whilst the response "don't know" is a valid response on the form, it is not appropriate to this development, which relies on working fire hydrants to feed the proposed fire main. In circumstances such as this, best practice is to check the state of the existing hydrants with the water authority. Without knowing their operability, the proposal might be relying on a disused water main or faulty hydrant. 2.5. It will be for the applicant to demonstrate compliance at later regulatory stages. It should be considered that should additional hydrant installations be required, this may affect land use planning considerations such as the landscaping around the development.	
Metropolitan Police (Designing Out Crime)	*Section 1 - Introduction:* Thank you for allowing us to comment on the above planning proposal.	The conditions are already in place in the hybrid

	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). We have met with the project Architects on several occasions to discuss Crime Prevention and Secured by Design at both feasibility, pre-application stage and at various technical stages for the current phases. Our concerns around the design and layout of the development which was taken into account by the Architects. They have only made mention to Secured by Design principles in the planning statement and there are no specific documents that reference design out crime or crime prevention, but this can be addressed with a suitably worded condition. At this point it can be difficult to design out fully any issues identified. At best crime can only be mitigated against, as it does not fully reduce the opportunity of offences. Whilst in principle we have no objections to the site, we have recommended the attaching of suitably worded conditions and an informative as per previous applications for the site. The comments made can easily be mitigated early if the Architects and Developer ensure that the ongoing dialogue with our department continues throughout the design and build process. This can be achieved by the below Secured by Design conditions being applied (Section 2). If the Conditions are applied, we request the completion of the relevant SBD application forms at the earliest opportunity. The project has the potential to achieve a Secured by Design Accreditation if advice given is adhered to. *Section 2 - Secured by Design Conditions and Informative:* In light of the information provided, we request the following Conditions and Informative: Conditions: A. Prior to the commencement of above ground works of each building or part of a building, details shall be submitted to and approved, in writing, by the Local Planning Authority to demonstrate that such building or such part of a building can achieve 'Secured by Design' Accreditation. Accreditation must be achievable according to current and relevant Secured by Design guidelines 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.	permission decision notice so are not required.

	B. Prior to the first occupation of each building or part of a building or its use, 'Secured by Design' certification shall be obtained for such building or part of such building or its use and thereafter all features are to be retained. Informative: The applicant must seek the continual advice of the Metropolitan Police Service Designing Out Crime Officers (DOCOs) to achieve accreditation. The services of MPS DOCOs are available free of charge and can be contacted via docomailbox.ne@met.police.uk or 0208 217 3813.	
Natural England	Natural England has no comments to make on this reserved matters application. Natural England has not assessed this application for impacts on protected species. Natural England has published Standing Advice which you can use to assess impacts on protected species or you may wish to consult your own ecology services for advice. Natural England and the Forestry Commission have also published standing advice on ancient woodland, ancient and veteran trees which you can use to assess any impacts on ancient woodland or trees. The lack of comment from Natural England does not imply that there are no impacts on the natural environment, but only that the application is not likely to result in significant impacts on statutory designated nature conservation sites or landscapes. It is for the local planning authority to determine whether or not this application is consistent with national and local policies on the natural environment. Other bodies and individuals may be able to provide information and advice on the environmental value of this site and the impacts of the proposal to assist the decision making process. We advise local planning authorities to obtain specialist ecological or other environmental advice when determining the environmental impacts of development. We recommend referring to our Site of Special Scientific Interest Impact Risk Zones (available on Magic and as a downloadable dataset) prior to consultation with Natural England. Further guidance on when to consult Natural England on planning and development proposals is available on gov.uk at https://www.gov.uk/guidance/local-planning-authorities-get-environmental-advice	
Transport For London (TFL)	Given the nature of the scheme which does not directly affect St Ann's Road or its bus routes, I only make brief comments on the cycle parking and access matters. Noted that a total of 272 cycle parking spaces will be provided for Phase 3. The LCDS has also been complied with the exception of	The positive comments on cycle stores are noted and delivery is captured

	aisle widths where both LBH and TfL have approved a reduced width. These principles are welcomed: 5% of spaces to accommodate larger cycles - large enough to accommodate cargo bikes. • 20% of Sheffield Stands (with no tier above) • 1m between Sheffield Stands. • No more than 2 sets of Doors. • 2.5m aisle widths (in agreement with LBH & TfL at the Hybrid Application Stage (HGY/2022/1833)). • Josta (gas assisted) two-tier for remaining stands (See Figure 4.1), with: – 400mm spacing between racks. – 2.6m floor to ceiling height Parking for houses: Location is at rear of a house – unless there are access points from garden onto public realm of St Ann's Road, users would need to take bicycles through their house, and the applicant should identify how secure parking could be provided towards the front door / main entrance to the house. Occupiers may choose to use the cycle store for other uses. Parking for flats: The plans show separate provision for oversized bicycles, which is welcomed, and which could assist with managing ease of access to a parking space for owners of a cargo bike or other oversized bike into such a dedicated store Short stay parking: This looks to be well planned to meet arrival points and desire lines into the site for visitors to the site. As such, with the exception of location of cycle parking for the homes which should be revised and clarified, TfL would not object to this application being discharged.	through condition. Potential siting of the rear bike stores to the front of the houses was considered but this would be in conflict with the refuse store and entrance. Clear access is provided through the units to the rear and is considered acceptable.
Thames Water	Waste Comments: Public sewers are crossing or close to your development. Build over agreements are required for any building works within 3 metres of a public sewer and, or within 1 metre of a public lateral drain. This is to prevent damage to the sewer network and ensures we have suitable and safe access to carry out maintenance and repairs. Please refer to our guide on working near or diverting our pipes:https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes Please ensure to apply to determine if a build over agreement will be granted. 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	Noted that existing conditions attached

	follow Policy SI 13 Sustainable drainage of the London Plan 2021. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. Should you require further information please refer to our website. https://www.thameswater.co.uk/help/home-improvements/how-to-connect-to-a-sewer/sewer-connection-design Thames Water would advise that with regard to FOUL WATER sewerage network infrastructure capacity, we would not have any objection to the above planning application, based on the information provided. Water Comments: Water Comments: N/A Supplementary Comments: Water - Previous comments remain.	