

Appendix 3: Consultation Responses from internal and external agencies/Neighbour Responses

Stakeholder	Question/Comment	Response
INTERNAL		
LBH Carbon Management	<p>Carbon Management Response 27/09/2024</p> <p>In preparing this consultation response, we have reviewed:</p> <ul style="list-style-type: none"> • Energy Statement prepared by IN2 (dated 26 July 2024) • Overheating analysis prepared by IN2 (dated 14 Aug 2024) • Sustainability Statement prepared by IN2(dated 26 July 2024) • Biodiversity New Gain Assessment prepared by Greengage (dated August 2024) • Whole Life Cycle Carbon Assessment prepared by IN2 (dated 30 July 2024) • Relevant supporting documents. <p>1. Summary</p> <p>The development achieves a reduction of 71% carbon dioxide emissions on site, which is supported in principle. However, Carbon Management would object to this application as the development does not currently meet:</p> <ul style="list-style-type: none"> • London Plan Policy SI4 and Local Plan DM21: The proposed dynamic thermal modelling does not properly follow the cooling hierarchy. The final overheating strategy is not inclusive of the high priority passive measures as per the cooling hierarchy. Also, the modelling of DSY2-3 2020s and future weather files DSY1 2050s and DSY1 2080s is missing. No future overheating mitigation measures proposed. • London Plan Policy SI7: The whole life carbon report shows very high Global Warming Potential of the proposed development which is far below from meeting the GLA and LETI benchmark. Also, it is unclear how and which of the recommended measures will be actioned. • London Plan Policies G5, G6 and Local Plan DM21: The urban greening factor and biodiversity net gain is below the policy requirement. <p>Further information needs to be provided to address this objection, in relation to the Energy Strategy, Overheating Strategy, Sustainability Strategy (UGF and BNG) and Whole Life-</p>	Recommended conditions and s106 heads of terms included.

Cycle Carbon Assessment. This should be addressed prior to the determination of the application.

2. Energy Strategy

Policy SP4 of the Local Plan Strategic Policies, requires all new development to be zero carbon (i.e. a 100% improvement beyond Part L 2021). The London Plan (2021) further confirms this in Policy SI2.

The overall predicted reduction in CO₂ emissions for the development shows an improvement of approximately 71% 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 14.9 tonnes of CO₂ from a baseline of 21 tCO₂/year.

London Plan Policy SI2 requires major development proposals to calculate and minimise unregulated carbon emissions, not covered by Building Regulations. However, the report does not include the unregulated carbon emissions.

Residential (SAP10.2 emission factors)			
	Total regulated emissions (Tonnes CO₂ / year)	CO₂ savings (Tonnes CO₂ / year)	Percentage savings (%)
Part L 2021 baseline	21.0		
Be Lean	18.1	2.9	14%
Be Clean	18.1	0.0	0%
Be Green	6.1	12.0	57%
Cumulative savings	-	14.9	71%
Carbon shortfall to offset (tCO₂)	6.1		
Carbon offset contribution	£95 x 30 years x 6.1 tCO ₂ /year = £17,385		
10% management fee	£1,738.50		

Actions:

- What are the total unregulated carbon emissions?

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	Residential
EUI	30.49 Wh/m ² /year	Meets GLA benchmark of 35/65/55 kWh/m ² /year
SHD	18.60 kWh/m ² /year	Does not meet GLA benchmark of 15 kWh/m ² /year
Methodology used	Bespoke calculation (provide details in column T) & CIBSE TM54	

Energy – Lean

The applicant has proposed a saving of 2.9 tCO₂ in carbon emissions (14%) through improved energy efficiency standards in key elements of the build. This goes beyond the minimum 10% set in London Plan Policy SI2, so this is supported.

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

Floor u-value	0.11 W/m ² K
External wall u-value	0.14 W/m ² K
Roof u-value	0.11 W/m ² K
Door u-value	TBC
Window u-value	1.20 W/m ² K
G-value	0.42
Air permeability rate	2.5 m ³ /hm ² @ 50Pa

Ventilation strategy	Mechanical ventilation with heat recovery (MVHR 87% efficiency; 1.32 W/l/s Specific Fan Power)
Thermal bridging	Accredited Construction Details
Low energy lighting	100%
Heating system (efficiency / emitter)	84.90%, underfloor / radiators

Actions:

- Under Baseline and Be Lean scenarios, the boiler efficiency should be modelled as 89.50% in line with the GLA energy assessment guidance and the approved Document Part L2021. Please amend.
- Please identify on a plan where the MVHR units will be located within the dwellings. The units should be less than 2m away from external walls. This detail can also be conditioned.
- How is lighting energy demand improved? Should consider daylight control and occupancy sensors for communal areas.
- What is the proportion of glazed area? Consider following the LETI Climate Emergency Design Guide principles in façade design.
- The fabric efficiencies and thermal bridging should be improved upon to reduce heat losses.
- If the air tightness of the scheme is improved, mechanical ventilation with heat recovery could be proposed to further reduce heat losses.
- Set out how the scheme's thermal bridging will be reduced. [if below 0.15, check how/why. No measures are proposed to reduce heat loss from junction details, and it does not set out the what the proposed Psi (Ψ) value is.
- What is the construction of the building and what is the assumed thermal mass?
- Provide the average % improvement on the FEES.

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). A Combined Heat and Power (CHP) plant would not be appropriate for this site.

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.

Proposed renewable technologies	air source heat pumps (ASHPs) and solar photovoltaic (PV) panels
Total carbon reduction under Be Green Measures	12.0 tCO ₂ (57%)

Solar photovoltaic (PV) panels	
Peak output	2.9 – 3.2 kWp
Orientation and angle	45 degrees

Heat pump system	
Type	Air to-water
Min. SCOP	2.30
Heating system	TBC
Percentage of hot water and heating supply	TBC

Actions:

- Please provide some commentary on how the available roof space has been maximised to install solar PV. The submitted roof plan shows the proposal has not maximised Solar PV installation in line with London Plan SI2.

	<ul style="list-style-type: none"> - What is the peak output of the PV array, total electricity generation, and how much of the roof area will be covered approximately, what is the assumed efficiency, and angle of the panels? - 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. - Please identify on the plans where the air source heat pumps will be located and how the units will be mitigated in terms of visual and noise impact. - How much of the heating/hot water demand will be met by the proposed types of heat pumps? If this cannot be met fully, how will this be supplemented? <p>Energy – Be Seen</p> <p>London Plan Policy SI2 requests all developments to ‘be seen’, to monitor, verify and report on energy performance. The GLA requires all major development proposals to report on their modelled and measured operational energy performance. This will improve transparency on energy usage on sites, reduce the performance gap between modelled and measured energy use, and provide the applicant, building managers and occupants clarity on the performance of the building, equipment and renewable energy technologies.</p> <p>The applicant should install metering equipment on site, with sub-metering by dwelling unit. A public display of energy usage and generation should also be provided in the main entrance area to raise awareness of residents.</p> <ul style="list-style-type: none"> - 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) <p>3. Carbon Offset Contribution</p> <p>A carbon shortfall of 6.1 tCO₂/year remains. The remaining carbon emissions will need to be offset at £95/tCO₂ over 30 years.</p> <p>4. Overheating</p>	
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London Plan Policy SI4 requires developments to minimise adverse impacts on the urban heat island, reduce the potential for overheating and reduce reliance on air conditioning systems. Through careful design, layout, orientation, materials and incorporation of green infrastructure, designs must reduce overheating in line with the Cooling Hierarchy.

In accordance with the Energy Assessment Guidance, the applicant has undertaken a dynamic thermal modelling assessment in line with CIBSE TM59 with TM49 weather files, and the cooling hierarchy has been followed in the design. The report has modelled 63 habitable rooms under the London Weather Centre files.

The noise impact assessment has recommended different windows opening restrictions based on blocks, room type, level and location. The assessment also recommends MVHR units to have appropriate attenuation for preventing external noise break-in via ductwork and for controlling the noise levels from the mechanical system itself. This should be developed at the detailed design stages.

Results are listed in the table below.

Domestic: CIBSE TM59	Predominantly naturally ventilated
	Percentage pass
DSY1 2020s	
Baseline	45%
Windows Restrictions	2%
External shading	13%
MVHR air tempering	100%
DSY2 2020s	Not modelled
DSY3 2020s	Not modelled
DSY1 2050s	Not modelled
DSY1 2080s	Not modelled

All spaces pass the overheating requirements for 2020s DSY1. In order to pass this, the following measures will be built:

- Natural ventilation, with openable areas informed by the noise impact assessment.
- Glazing g-value of 0.42
- MVHR with air tempering

	<p>No future mitigation measures were proposed:</p> <p>The submitted overheating strategy is considered not acceptable for the following reasons:</p> <ul style="list-style-type: none"> - The Overheating Assessment does not properly demonstrate and incorporate measures in line with the cooling hierarchy. The report has modelled some of passive measures including external shading, which is a high priority measure as per the cooling hierarchy, however, these measures do not form a part of the final strategy. The final overheating strategy should be inclusive of the passive measures incorporated inline with the cooling hierarchy. <p><u>Actions:</u></p> <ul style="list-style-type: none"> - Demonstrate how the Cooling Hierarchy has been followed and forms a part of the overall strategy. This is to ensure all passive measures have been incorporated which will result in lower cooling demand and associated low cost. - 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. - 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. Internal blinds cannot be used to pass the weather files but can form part of the delivered strategy to reduce overheating risk for occupants (as long as it does not compromise any ventilation requirements). - Undertake further modelling: <ul style="list-style-type: none"> o Model the 2020s DSY 2 and 3 and DSY1 for the 2050s and 20280s. 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 Habitable communal spaces (e.g. communal living/dining rooms in care homes); o Communal corridors, where pipework runs through; - 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. 	
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	<ul style="list-style-type: none"> - 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. - 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>5. Sustainability</p> <p>Policy DM21 of the Development Management Document requires developments to demonstrate sustainable design, layout and construction techniques. The sustainability section in the report sets out the proposed measures to improve the sustainability of the scheme, including transport, materials and waste, whole-life carbon, sustainable MEP design, water consumption, flood risk and drainage, biodiversity, urban greening, pollution, air quality, energy and CO2 emissions and landscape design.</p> <p>Urban Greening / Biodiversity</p> <p>All development sites must incorporate urban greening within their fundamental design and submit an Urban Greening Factor Statement, in line with London Plan Policy G5. London Plan Policy G6 and Local Plan Policy DM21 require proposals to manage impacts on biodiversity and aim to secure a biodiversity net gain. Additional greening should be provided through high-quality, durable measures that contribute to London's biodiversity and mitigate the urban heat island impact. This should include tree planting, shrubs, hedges, living roofs, and urban food growing. Specifically, living roofs and walls are encouraged in the London Plan. Amongst other benefits, these will increase biodiversity and reduce surface water runoff.</p> <p>The Biodiversity Net Gain calculation show a 9.97% decrease in BNG which does not comply with local and national policy, nor does it meet the minimum target of 10% as set out by the Environment Act (2021). The report BNG assessment recommends off-site compensation to meet the 10% increase target, equating to 0.72HU, however the no off-site compensation has been proposed in the submission. This is not acceptable.</p>	
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Similarly, the Urban Greening Factor calculation results to 0.31 which is below the policy requirement of 0.40. This is against Policy G5 and is not acceptable.

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.

This application is not required to submit a full statement. However, the applicant has submitted a full assessment which shows 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)	994 kgCO ₂ e/m ²	Does not meet GLA benchmark (<850 kgCO ₂ e/m ²) but is far from the aspirational target (<500 kgCO ₂ e/m ²).	Modules A1-A5 achieve a band rating of 'F', not meeting the LETI 2020 Design Target.
Use and End-Of-Life Stages Modules B-C (excl. B6 and B7)	721 kgCO ₂ e/m ²	Does not meet GLA target (<350 kgCO ₂ e/m ²) and is very far from the aspirational benchmark (<300 kgCO ₂ e/m ²).	
Modules A-C (excl B6, B7 and incl. sequestration)	1605 kgCO ₂ e/m ²	Does not meet 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 'G', not meeting the LETI2020 Design Target.

	<p>The proposed development is estimated to have a total GWP of 3,908,028 kgCO₂eq (excl. sequestered carbon), resulting in a carbon intensity of 1,931 kgCO₂eq/m², across its entire life cycle (A1-A5, B4, B6, and C1-C4). Majority of the carbon emissions result from the production of steel (27.9%) and concrete (21.5%) products to be used in foundations and structural frames.</p> <p>The WLC report recommends reduction of either the quantities or the recycled content of steel and concrete products used in foundations and structural frames. However, it is unclear what measures will be taken forward to reduce the total GWP of the proposed development.</p> <p>6. Planning Conditions To be secured (with detailed wording TBC)</p> <ul style="list-style-type: none"> - Energy strategy - Overheating - Sustainability - Whole-Life Carbon - Biodiversity Net Gain - Urban Greening - Water Butts <p>7. Planning Obligations Heads of Terms</p> <ul style="list-style-type: none"> - Be Seen commitment to uploading energy data - Energy Plan - Sustainability Review - Estimated carbon offset contribution (and associated obligations) of £17,385 (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. <p>Carbon Management Response 14/01/2024</p> <p>In preparing this consultation response, we have reviewed:</p> <ul style="list-style-type: none"> • Energy Statement prepared by IN2 (dated 26 July 2024) 	
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	<ul style="list-style-type: none"> • Overheating analysis prepared by IN2 (dated 12 Nov 2024) • Sustainability Statement prepared by IN2(dated 26 July 2024) • Biodiversity New Gain Assessment prepared by Greengage (dated August 2024) • Whole Life Cycle Carbon Assessment prepared by IN2 (dated 30 July 2024) • Relevant supporting documents. <p>1. Summary</p> <p>The development achieves a reduction of 71% carbon dioxide emissions on site, which is supported in principle. Some clarifications must be provided with regards to Overheating Analysis which has been conditioned.</p> <p>The development is not complaint to the London Plan Policies G5, G6 and Local Plan DM21, as the urban greening factor and biodiversity net gain is below the policy requirement. Off-site compensation must be made in order to make this acceptable.</p> <p>Planning conditions have been recommended to secure the benefits of the scheme.</p> <p>2. Energy Strategy</p> <p>The applicant confirms the total unregulated emission is 8.1 tCO2 per year.</p> <p>Energy – Lean</p> <p>Stage 2 MEP report for location of MVHR unit has been submitted which includes annotated locations of the ASHP, MVHR units, its ductworks and details on proposed Solar PV.</p> <p>The applicant confirms that the South, East and West elevations is designed in line with LETI guide. North elevation has been maximised for daylighting and energy balance and, visual and occupant comfort. High performance glazing to be used indicating good thermal and energy performance.</p> <p>The proportion of glazed areas are as follows:</p> <ul style="list-style-type: none"> • North: 41.5% • South: 25% • East: 6% • West: 4.7% 	
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	<p>The average improvement on the Fabric Energy Efficiency Standard is 2%.</p> <p>3. Carbon Offset Contribution A carbon shortfall of 6.1 tCO₂/year remains. The remaining carbon emissions will need to be offset at £95/tCO₂ over 30 years.</p> <p>4. Overheating The applicant has revised the overheating assessment and the final overheating measures includes external shutters. The submitted Shutter location drawings and MEP Report does not provide all the details of the propose shading features. Further details will be required at later stages and is conditioned.</p> <p>The development has opening restrictions due to noise issues, and mechanical ventilation criteria will apply. However, to ensure the façade design has been optimised and maximised passive measures, regardless of the constraints posed by the site's location natural ventilation criteria should also be modelled separately. The applicant has undertaken this, and the baseline results show only 45% of the assessed zones pass the natural ventilation criteria. This shows that the development has not maximised passive design measures. It is recommended to further explore passive design interventions and measures to improve the overheating risks of the development.</p> <p>All 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 informed by the noise impact assessment. - Glazing g-value of 0.42 - External shutters - MVHR with air tempering <p>The applicant confirms MVHR with air tempering is designed to accommodate for extreme weather files.</p> <p><u>Actions:</u></p> <ul style="list-style-type: none"> - Please explore design interventions to passively mitigate the overheating risks aiming for all or maximum units to pass with naturally ventilated criteria without noise restriction and mechanical cooling including MVHR. This will ensure the development 	
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	<p>has maximised passive measures, is resilient to overheating risks, and cooling energy bill is low.</p> <ul style="list-style-type: none"> - Undertake further modelling: <ul style="list-style-type: none"> o Model the 2020s DSY 2 and 3 and DSY1 for the 2050s and 20280s. 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. <p>5. Sustainability</p> <p>Urban Greening / Biodiversity No off-site compensation has been proposed in the submission. This is required to make it acceptable.</p> <p>Whole Life-Cycle Carbon Assessments No further comments.</p> <p>6. Planning Obligations Heads of Terms</p> <ul style="list-style-type: none"> - Be Seen commitment to uploading energy data - Energy Plan - Sustainability Review - Estimated carbon offset contribution (and associated obligations) of £17,385 (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. <p>7. Planning Conditions To be secured:</p> <p>Energy Strategy The development hereby approved shall be constructed in accordance with the Energy Statement prepared by IN2 (dated 26 July 2024) delivering a minimum 71% improvement on carbon emissions over 2021 Building Regulations Part L, with high fabric efficiencies, INDIVIDUAL air source heat pumps (ASHPs) and a minimum 3.2 kWp per building solar photovoltaic (PV) array.</p>	
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	<p>(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:</p> <ul style="list-style-type: none"> - Confirmation of how this development will meet the zero-carbon policy requirement in line with the Energy Hierarchy; - Confirmation of the necessary fabric efficiencies to achieve a minimum 14% reduction; - Details to reduce thermal bridging; - Location, specification and efficiency of the proposed ASHPs (Coefficient of Performance, Seasonal Coefficient of Performance, and the Seasonal Performance Factor), with plans showing the ASHP pipework and noise and visual mitigation measures; - Specification and efficiency of the proposed Mechanical Ventilation and Heat Recovery (MVHR), with plans showing the rigid MVHR ducting and location of the unit; - Details of the PV, demonstrating the roof area has been maximised, with the following details: a roof plan; the number, angle, orientation, type, and efficiency level of the PVs; how overheating of the panels will be minimised; their peak output (kWp); inverter capacity; and how the energy will be used on-site before exporting to the grid; - Specification of any additional equipment installed to reduce carbon emissions, if relevant; - A metering strategy <p>The development shall be carried out strictly in accordance with the details so approved prior to first operation and shall be maintained and retained for the lifetime of the development.</p> <p>(b) The solar PV arrays & 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.</p>	
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	<p>(c) Within six months of first occupation, evidence shall be submitted to the Local Planning Authority that the development has been registered on the GLA's Be Seen energy monitoring platform.</p> <p>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.</p> <p>Overheating</p> <p>Prior to the above ground commencement of the development, an updated Overheating Report shall be submitted to and approved by the Local Planning Authority. The submission shall assess the overheating risk and propose a retrofit plan. This assessment shall be based on Overheating analysis prepared by IN2 (dated 12 Nov 2024).</p> <p>This report shall include:</p> <ul style="list-style-type: none"> - Revised modelling of units modelled based on CIBSE TM59, using the CIBSE TM49 London Weather Centre files for the DSY1-3 (2020s) and DSY1 2050s and 2080s, high emissions, 50% percentile; - Demonstrating the mandatory pass for DSY1 2020s can be achieved maximising passive design measures in line with the Cooling Hierarchy under naturally ventilated criteria; - Demonstrating that any risk of crime, noise and air quality issues are mitigated appropriately evidenced by the proposed location and specification of measures. - Modelling of mitigation measures required to pass future weather files, clearly setting out which measures will be delivered before occupation and which measures will form part of the retrofit plan; - Confirmation that the retrofit measures can be integrated within the design (e.g., if there is space for pipework to allow the retrofitting of cooling and ventilation equipment), setting out mitigation measures in line with the Cooling Hierarchy; - Confirmation who will be responsible to mitigate the overheating risk once the development is occupied. <p>(c) Prior to occupation, the development must be built in accordance with the approved overheating measures and retained thereafter for the lifetime of the development:</p> <ul style="list-style-type: none"> - Natural ventilation, with openable areas informed by the noise impact assessment. 	
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	<ul style="list-style-type: none"> - Glazing g-value of 0.42 - External shutters - MVHR with air tempering - Hot water pipes insulated to high standards. - Any further mitigation measures as approved by or superseded by the latest approved Overheating Strategy. <p>If the design of dwelling is amended, or the heat network pipes will result in higher heat losses and will impact on the overheating risk of any units, a revised Overheating Strategy must be submitted as part of the amendment application.</p> <p>REASON: In the interest of reducing the impacts of climate change, to enable the Local Planning Authority to assess overheating risk and to ensure that any necessary mitigation measures are implemented prior to construction, and maintained, in accordance with London Plan (2021) Policy SI4 and Local Plan (2017) Policies SP4 and DM21.</p> <p>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.</p> <p>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.</p> <p>Water Butts No dwelling shall be occupied until details of the location of a water butt of at least 120L internal capacity to be installed to intercept rainwater draining from the roof of each dwelling has been submitted to and approved in writing by the Local Planning Authority and subsequently provided at each dwelling. The approved facilities shall be retained.</p> <p>Reason: To reduce the risk of flooding and demand for water, increase the level of sustainability of the development and in line with Haringey Local Plan Policy SP5, DM21, DM24 and DM25.</p>	
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LBH Noise	Having read the report, in my opinion this seems acceptable as the construction noise was having a factor on the noise readings and when built and occupied there wouldn't be construction noise.	Noted.
LBH Conservation Officer	<p>Comments 08/05/2025:</p> <p>The application site lies within the Highgate Conservation Area. The significance of the bishops sub-area derives from its development as a suburban extension to the original settlement of Highgate village, although in a form which is in direct contrast to the higher density, late-Victorian suburban development to the east of the historic village. From the outset, the type of housing created was intended for a wealthy clientele and this is reflected in the lower density of development consisting of large, detached houses contained within individual plots, with generously sized gardens. Several of the 1914-1930 Arts and Crafts houses survive set in generous plots with large front and rear gardens.</p> <p>However, Denewood Road has substantially developed since the 1950s, although several of its key characteristics have been retained. The original plot layout with generous well landscaped plots remain. Views of verdant gardens remain in front and in between houses with wide gaps between houses. Houses are generally well set back behind gardens, screened generously with mature trees and well soft landscaped gardens Denewood Road is currently characterised as a suburban and leafy, almost secluded residential road where the mature vegetation and front gardens reveal glimpses of the residential buildings along the road. Local views along and across Denewood Road illustrate the domestic townscape and prevailing landscape features which contribute to the surviving character of this part of the Conservation Area.</p> <p>The partially implemented consent (HGY/2018/3205) set out the principle of two main tranches of development a front block, facing Denewood Road, with a larger development behind. However the type of the development has changed from flats to townhouses, and the basement development has been omitted, resulting in ground level parking. The architectural form of the buildings has adopted a similar language to the previously existing and this is welcomed.</p>	<p><i>Noted. The amended plans have reduced the less than substantial harm to the conservation area in comparison to the original submission which when weighed against the public benefits of the scheme, are considered to be outweighed by the benefits. This is discussed in more detail in the Heritage Conservation section of the Committee report.</i></p>

	<p>However, the previous design was thoroughly tested and negotiated to reduce its impact on the surrounding important trees and to locate and organise the massing of the buildings to reduce their impact on the Conservation Area. The current application has approached the layout of the scheme differently. The main issues around this development and its impact on the significance of the Highgate Conservation Area, and the adjacent Goldsmiths Cottage compared to the previous application are the changes to the front block, its siting and design, and the proposed landscaping including the existing trees, proposed planting/materials and boundary treatments.</p> <p>The changes to the front block will have the greatest direct impact on the streetscene and how the development is perceived. The change in the orientation of the front block neutral, as the site lies between two sites which have contrasting approaches, most of the existing are not perpendicular to the angle of the street. However the built form has been brought much closer to the street, Whilst the current scheme is a similar height, the buildings are now sited very close to the front boundary, the setback of the building line varies between 2 to 4m and has brought the development around 4m closer to the front boundary. Whilst some elements of the group are single storey, with a terrace, This has increased the prominence of the terrace on the street, the CGIs show a much more domineering building because of its incongruous proximity to the street and the significantly reduced the depth of the front garden and available space for soft landscaping to help soften the impact of the building. The provision of balconies overlooking the street is not an existing feature of the street which would likely exacerbate this impact.</p> <p>The changes to the front block have significantly altered how the balance between the built form and the landscaping is appreciated from Denewood Road. The terrace is now a much more dominant addition, and this erodes the verdancy of the streetscene and characteristic pattern of houses set behind mature landscaped gardens and would be considered to cause harm to the significance of the Highgate Conservation Area as a result.</p> <p>The other main concern are the changes to the landscaping. There is a general loss of larger scale planting around the boundaries and to the front of the site. The loss of several mature trees will reduce the verdancy of the streetscene. Whilst some of these are in relation to their current condition, the loss of tree 4, the tallest and most visible from several viewpoints in the site and the surrounding streets such as View Road, View Close and Willowdene is likely to have a marked impact on the appreciable verdancy of the area, because of the loss of its</p>	
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	<p>height. The reduction in the depth for planting, and the proposed levels of planting to the north, north-west and south-west boundaries and the increased amount of hard landscaping does not provide the same softening effect as the previous scheme, or the existing site. This will also disrupt the balance between the built form and soft landscaping on the site.</p> <p>Altogether, this current scheme would now be considered to cause less than substantial harm to the significance of the Highgate Conservation Area, whereas the previously proposed scheme on this site was fully supported. The siting and design of the front block of housing, together with the landscaping proposals would contribute to the erosion of the historic plot layout and design of this part of the Conservation Area. This application scheme would reduce the suburban and leafy, character of the area. This level of harm could have been avoided or reduced through a more conservation led approach to the site layout and design.</p> <p>Additional comments following August amended plans/documents 02/09/2025:</p> <p>Further to my original consultation response, amendments have been made to the Denewood Road facing front block, and its layout to address some of the previously raised concerns.</p> <p>The front block is still closer than the previously approved scheme, but two units have been reduced in their depth, and the building line of the front block has been amended to stagger back, rather than forward, from the western most dwelling. This greater setback has helped to reduce some of the impact so that it would be less prominent within the streetscene than the original submission. These changes have allowed a little more space to the front and some increase to the amount of low to mid height planting. The changes to the front boundary wall are also considered a positive amendment and better reflects the boundary treatments immediately adjacent.</p> <p>The amendments to the front block have helped address some of the concerns raised, but given the other issues previous raised around the landscaping, it would still be considered to cause some less than substantial harm to the significance of the Highgate conservation Area, though this level of harm is less than the harm caused by the originally submitted scheme. This should be considered and balanced against the public benefits of the proposal in accordance with the provisions of the NPPF.</p>	
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<i>LBH Design Officer</i>		
<i>LBH Transportation</i>	<p>Transportation Planning Comments HGY/2024/2168, Newstead, Denewood Road, Hornsey, London, N6 4AL Date: 20/05/2025</p> <p>Proposal: Erection of three buildings to provide 11 residential dwellings, amenity space, greening, cycle parking and associated works</p> <p>Description</p> <p>An application has been received seeking planning permission to erect three buildings that will provide 11 residential dwellings, with associated car and cycle parking, refuse, and highway works.</p> <p>The development site was previously used as a 36-bedroom nursing home. The development would see the provision of 11 car parking spaces with one of the spaces designated as a disabled car parking bay. The parking spaces would be supported by electric charging points. The site will have 22 long-stay and 2 short-stay cycle spaces for residents and visitors.</p> <p>The proposal site has a PTAL rating of 1b as stated on Transport for London's WebCAT tool, this indicates that its access to public transport is very poor when compared to London as a whole suggesting that there will be a strong reliance on the private vehicle for trips to access the site. The site is located within the Highgate Underground Station Outer CPZ which restricts parking to permit holders Monday to Friday 10:00 – 12:00.</p> <p>The nearest station to the site is Highgate Wood Station, it is around a 14 min walk and a 6 min bike ride. Local bus services can be found on the A1 which includes several high frequency routes, where residents can get to areas such as Muswell Hill and Archway that offer access to shops, services, and transport links. The development location is not near to any of Transport for London's cycle infrastructure.</p>	<p><i>Recommended conditions and s106 heads of terms included subject to minor wording amendments.</i></p>

	<p>Denewood Road and surrounding residential streets have a speed limit of 20 mph. It should be noted that Denewood Road has a residual width of around 5.5m taking on street parking into consideration. The site is in close proximity to the A1 that forms part of Transport for London's Strategic Road Network. Two schools are located within proximity to site (Highgate School and Highgate Junior School).</p> <p>The site currently has an existing vehicle access on to Denewood Road, this application would see this access on to Denewood Road retained and moved to a new location. Pedestrians will be provided with a separate dedicated gated access to enter the site. It is to be noted that the application site was previously granted planning consent under planning reference HGY/2018/3205 for the construction of 13 residential dwellings.</p> <p>Unit mix Proposed: 3 x 3 bedroom and 8 x 4 bedroom dwellings.</p> <p>Trip generation</p> <p>Trip information has been forecasted which has been broken down into the existing, consented and proposed uses of the site. For the existing and consented scheme, the applicant has used previously submitted data from the approved application HGY/2018/3205. The trip information for the proposed development has been predicted with surveyed data from the TRICS database, the sites used have been provided within the Transport Statement.</p> <p>PTAL rating of the sites range from 1a to 4, 3 of the sites are within London, 2 sites were larger in the number of dwellings being created. The data was supplemented with by mode split data from the 2011 census. For comparison 2021 census data was also sent over which showed dramatic differences in public transport and car usage whilst work from home saw a 29% increase, though changes are attributed to Covid 19.</p> <p>Proposed two-way daily trips:</p> <ul style="list-style-type: none"> • Pedestrians: 8 • Cyclists: 6 • Public transport: 75 • Vehicle: 32 	
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	<p>Overall, the above data demonstrates that the new development will still produce significant number of trips by public transport. Although, it should be noted that private vehicle trips will still be much higher than active travel trips, this would be linked to the high number of general parking spaces proposed.</p> <p>Car parking</p> <p>Planning policy requires that applications for planning permission be determined in accordance with the development plan unless material considerations indicate otherwise. The published London Plan 2021 Policy T6.1 Residential Parking requires that development proposals must comply with the relevant parking standards. For a development of this type, a 3 x 3 bedroom and 8 x 4 bedroom dwellings with a PTAL rating of 1b. Maximum parking standards apply which limits the number of car parking spaces that can be provided for a development of this nature which has a low PTAL rating.</p> <p>Given the low PTAL of the site and its proximity to Highgate Underground train station and its proximity to bus services on the A1, the development will be designated as car capped development meaning the onsite car parking must be in accordance with Haringey's Development Management DPD, Policy DM32 which states the council will support proposals for new developments with limited or no on-site parking, where:</p> <ul style="list-style-type: none"> • There are alternative and accessible means of transport available. • Public transport accessibility is at least 4 as defined in the Public Transport Accessibility Index. • A Controlled Parking Zone (CPZ) exists or will be provided prior to the occupation of the development. • Parking is provided for wheelchair accessible units. <p>Additionally, the above is supported by the published London Plan 2021 T6.1 Residential Parking would allow for a greater amount of on-site parking at 17 spaces. Therefore, car capping the development to 11 spaces and making it permit free will ensure that the site does not generate high number of private vehicle trips onto the surrounding road network, helps to support local public transport options, and does not increase on-street parking stress.</p>	
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	<p>In line with DM32 and the published London Plan 2021 T6.1, disabled person's parking should be provided for new residential developments delivering 10 or more units. As a minimum 3% of dwellings must have at least 1 designated disabled persons parking bay from the outset. This Policy further requires that new developments be able to demonstrate as part of a Parking Design and Management Plan, how an additional 7% of dwellings could be provided with 1 designated disabled person's parking space per dwelling in future upon request as soon as the existing provision is insufficient.</p> <p>The applicant has demonstrated that the development proposal will be able to provide the required number of 1 fully accessible car parking space. The disabled car parking space should be designated according to the design guidance BS8300vol.1. Finally, all submitted plans received will need to demonstrate and show the correct dimensions for the bays, which includes the 1.2m hatched area for bays and comply with the Department of Transport's Inclusive Mobility 2021 guidance.</p> <p>Future parking demand</p> <p>No parking stress survey has been undertaken for this proposal. Consequently, LBH Transport Planning is unable to determine if there is effective on-street capacity to absorb any demand generated by the residents of the development. This is an additionally important factor given that the local CPZ that the site is within only operates for two hours a day Monday to Friday.</p> <p>The published London Plan 2021 Policy T2 Healthy Streets states that 'development proposals should reduce the dominance of vehicles on London's streets whether stationary or moving ', and DM32 which states that development will have limited or no on-site parking where 'a Controlled Parking Zone (CPZ) exists or will be provided prior to the occupation of the development. To be in accordance with these policies LBH Transport Planning will therefore require the securing of a S.106 obligation preventing residents from obtaining a parking permit.</p> <p>Electric vehicle charging</p> <p>Policy T6.1 Residential Parking requires that '20 per cent of spaces should have active charging facilities, with passive provision for all remaining spaces'. Therefore, the applicant</p>	
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	<p>will be required to provide 2 active and 9 passive electric charging points for the on-site parking. It is stated within the submitted Transport Statement that the development would exceed the standards within the London Plan 2021 but has not elaborated on how this would be done. Consequently, the above will be addressed via a pre-commence planning condition for the development to meet the minimum standards within the London Plan 2021.</p> <p>Cycle parking</p> <p>The sites total proposed cycle parking for both elements of the site were assessed against the published London Plan 2021 Policy T5 Cycle parking standards for compliance. Policy T5 Cycle requires that developments 'provide the provision of appropriate levels of cycle parking which should be fit for purpose, secure and well-located and be in accordance with the minimum standards. Residential is as follows: 1 space per 1 bedroom dwelling, 1.5 spaces 2-person 1 bedroom, 2 spaces per all other dwellings long-stay, and short-stay 5 to 40 dwellings: 2 spaces and thereafter 1 space per 40 dwellings. The development proposes to make provisions for 22 long-stay and 2 short-stay cycle spaces. Therefore, the development is in accordance with policy.</p> <p>The development will not be providing any enlarged Sheffield cycle spaces for cargo and adapted bikes on-site. Thus, the proposal is not in accordance with the published London Cycle Design Standards (LCDS) that requires all new developments to provide at least 5% of enlarged spaces from overall on-site parking provision.</p> <p>Locations for both the long and short stay cycle parking spaces has been provided. Parking will be located in the following areas: front and rear garden, a centralised bike store, and a single Sheffield stand. A centralised communal bike store will utilise two-tier cycle parking spaces, currently no information has been shared on their dimensions and designs. All rear garden bike stores can be accessed separately via side gates meaning that residents do not have to drag bikes through the properties and thus meaning that they are well-located. Details relating to the bike store will be secured by a pre-commencement planning condition requiring the applicant to submit details and plans of cycle parking spaces in line with the London Plan 2021 Policy T5 Cycle and Transport for London's London Cycle Design Standards (LCDS) which must be submitted and approved before development commences on-site.</p>	
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	<p>Travel plan</p> <p>No draft Travel Plan has been submitted as part of the application. Given that the site will generate private vehicle trips from its on-site parking and in order to maximise trips towards active travel and public transport by resident LBH Transport Planning will require a S.106 obligation for a Travel Plan and for payment of a monitoring fee to be paid per year for the first 5 years.</p> <p>Highway works</p> <p>The development would require some changes to the adopted highway on Denewood Road, these include the realignment of the new access, removal of a redundant crossover, restatement of the footway, removal of on-street parking, establishment of new parking bays, and associated road markings. The proposed internal layout and access changes have already been subjected to a Stage 1 Road Safety Audit. It has been independently audited with comments provided and the developer/applicant has provided a design response to issues identified by the auditor.</p> <p>The Transport Planning and highways department has concluded that the issues identified in the road safety audit can be addressed via further detailed design which will be subjected to a further Stage 2 Road safety audit which will be secured by a S.278 highway legal agreement between the council and the applicant.</p> <p>Access</p> <p>As previously stated, pedestrians will be provided with a separate pedestrian gated access adjacent to the vehicle entrance and bin stores. The plans were resubmitted includes a footpath with a width of 1.5m which should allow for easier movement of users consider the number of pedestrian trips generated by the development, the design is found to be acceptable.</p> <p>LBH Transport Planning has looked over data from Transport for London's Road Safety Collisions dashboard to examine the number of collisions in the vicinity of the site. The data captures collision from 2019 – 2024 and shows around the site itself on Denewood Road no collisions were identified, though further west from the site on Denewood Road a slight</p>	
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	<p>collision did take place involving a cyclist and a car. Clusters can be seen along the A1 involving fatal, serious and slight collisions over the same period.</p> <p>An objection has been received detailing heavy congestion and parking on Denewood Road produced by cars visiting the local schools located south of the site during peak pick-up and drop-off times. Evidence has been further submitted via a video from a resident showing cars parked along Denewood Road on single yellow lines and within bays. The existing access does seem to have vehicles park in front of it during school peaks times, though it should be noted that the existing site is not in use therefore vehicles are not hindering any access to the site. As the site is built out and the access moved there will be in constant use of the course of a day and will have appropriate associated road markings which will allow for illegal parking to be enforced.</p> <p>Car clubs</p> <p>Two car club bays are located within a 15-minute walk of the site, (Church Road and Hillside Gardens). Given the scale of this proposal which is for 11 residential dwellings and to ensure that the site is being sufficiently supported to maximise its potential to increase uses of sustainable transport and deter the use of the private car usage the developer will be required to work with a car club operator to provide a new car club bay on-street within the vicinity of the development which residents can make use of.</p> <p>This will assist with reducing the rate of car ownership by residents of this development and help to offset any potential future car parking demands on local residential streets as the CPZ restrictions do not fully operate all of the time and there is potential for the site to increase on-street parking demand. The applicant will also be required to provide 2 years of car club membership for each residential unit, along with £100 driving credit for each resident this will be secured via S.106 obligation. Full details on the car club provision must be submitted to the local authority for approval at least 6 months before the development is occupied as part of the travel plan.</p> <p>Service and delivery</p> <p>The submission does not include a service and delivery plan. However, some information has been received within the Transport Statement in relation to delivery vehicles swept paths</p>	
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	<p>and trips. Anything larger than a 7.5t box van with an overall length of 8m, swept path drawings demonstrate that the vehicle can effectively drive in and leave in a forward gear without issue.</p> <p>However, anything larger than a 7.5t box van will need to use an on-street parking bay as the site has not been set out to allow for a 10m vehicle, as no parking stress has been submitted it is difficult to determine what on-street availability is like. It is understood that this scheme utilises the same servicing arrangements as the consented application, though given the scale of the proposed dwellings requirements should made for bulkier deliveries capabilities on-site. Finally, swept path drawings have been presented for a 7.9m fire tender being able to enter and leave in a forward gear effectively in a forward gear. The sites bin store for the site will be located adjacent to the sites access from Denewood Road and will house 4 x large 1,100 litre Eurobins and 2 x 140 litre bins. It is assumed that refuse vehicles will either wait in front of the vehicle entrance impeding vehicles or will use a vacant parking bay nearby, although council operatives should be able to collect within the maximum 10m distance. No trip information has been provided for the sites overall servicing needs; therefore, it cannot be determined if the development will generate an overall increase/decrease from present usage or from the consented scheme.</p> <p>We will require a revised Service and Delivery Plan to manage deliveries accessing the site and to limit the number of trips to the site to manage the impact on the highway network, in accordance with the published London Plan 2021 Policy T7 Deliveries, servicing, and construction.</p> <p>Construction logistics</p> <p>A draft Construction Logistics Plan has been developed and submitted as part of the application. It sets out some of the basic principles of how the development will be built including: programme of works, vehicle routing/access, trip generation, monitoring, and existing site conditions, and demolition works phasing. The largest vehicle that is currently envisaged to visit the site during construction would be a 10.2m tipper lorry that will heavily rely upon strategic roads, with the Broadlands Road being its main point of access to the site. Trip generation shows that peak numbers would be around 12 a day during the piling phase.</p>	
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	<p>Significant detail is currently omitted at this stage within several sections of the document. Therefore, with any future submission more information is required on trip generation, swept paths, and possible forms of mitigation to offset construction. All routing will need to be agreed as part of the revised CLP which must be secured via a S.106 obligation.</p> <p>A staff construction travel plan will need to be created; effective monitoring is needed to ensure that no worker is travelling by car to the site and parking locally given. Before construction can begin a general highway, survey will need to be carried at to ascertain the condition of the footway and highway to determine if vehicle accesses will need to be reinforced. A further survey will need to be undertaken after works has been completed to determine if the condition of the highway has deteriorated during construction.</p> <p>A fully detailed draft of a worked-up Construction Logistics Plan will be required for review and approval prior to commencement of any site works. The applicant will need to liaise and discuss intended means of access and servicing the site from the Highway with Haringey Council's Network Management and Transport Planning teams. The outcomes of these conversations will need to inform the finished CLP.</p> <p>A CLP should include the following:</p> <ul style="list-style-type: none"> • High provision of cycle parking for workers for all phases of construction to promote uptake of cycling to/from the site. • Gives the sites excellent connectivity to public transport which is demonstrated through its close proximity to public transport, and local parking restrictions no on-site car parking should be provided for workers. • The following times, 08:00-09:00, 15:00-16:00, and 17:00-18:00, will need to be avoided by delivery and construction vehicles as to prevent vehicles from related to the development travelling when the road network is at its busiest because of school drop-off/pick-up times and peak road congestion. • Effort should be made to have a process in place to deal with delivery/construction vehicles that turn up late or announced, as to prevent vehicles waiting on the public highway causing an obstruction or waiting on nearby residential streets given the sites location. • <p>LBH Transport Planning would require that a Construction Logistics Plan (CLP) be submitted by the developer/applicant, this can be secured via a S.106 obligation. The developer/applicant will need to adhere to Transport for London's CLP guidance when</p>	
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	<p>compiling the document, construction activity should also be planned to avoid the critical school drop off and collection periods, the applicant will be required to pay a construction travel plan contribution of fifteen thousand pounds (£15,000) for the monitoring of the site's construction activities.</p> <p>Recommendation</p> <p>There are no highway objections to this proposal subject to the following conditions, S.106 and S.278 obligations.</p> <p>Conditions</p> <p>1. <u>Delivery and Servicing Plan and Waste Management</u></p> <p>The owner shall be required to submit a Delivery and Servicing Plan (DSP) for the local authority's approval. The DSP must be in place prior to occupation of the development. The service and delivery plan must also include a waste management plan which includes details of how refuse is to be collected from the site, the plan should be prepared in line with the requirements of the Council's waste management service which must ensure that all bins are within 10 metres carrying distance of a refuse truck on a waste collection day. It should demonstrate how the development will include the consolidation of deliveries and enable last mile delivery using cargo bikes.</p> <p>Details should be provided on how deliveries can take place without impacting on the public highway, the document should be produced in line with TfL guidance. The final DSP must be submitted at least 6 months before the site is occupied and must be reviewed annually in line with the travel plan for a period of 3 years unless otherwise agreed by the highway's authority.</p> <p>REASON: To ensure that the development does not prejudice the free flow of traffic or public safety along the neighbouring highway and to comply with the TfL DSP guidance 2020</p> <p>2. <u>Cycle Parking</u></p> <p>The applicant will be required to submit plans showing accessible; sheltered, and secure cycle parking for 22 long-stay, 2 short-stay, and 5% enlarged spaces for residents. The</p>	
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	<p>quantity must be in line with the London Plan 2021 T5 Cycle and the design must be in accordance with the London Cycle Design Standard. No Development (including demolition) shall take place on site until the details have been submitted and approved in writing by the Council.</p> <p>REASON: to be in accordance with the published London Plan 2021 Policy T5, and the cycle parking must be in line with the London Cycle Design Standards (LCDS).</p> <p><u>3. Electric Vehicle Charging</u></p> <p>Subject to a condition requiring the minimum provision of 2 active and 9 passive electric vehicle charging points to serve the on-site parking spaces from the onset.</p> <p>REASON: to be in accordance with published Haringey Council Development Management DPD, Chapter 5 Transport & Parking and the published London Plan 2021 Policy T6.1 Residential Parking.</p> <p><u>4. Disabled parking bays</u></p> <p>The applicant will be required to submit and provide plans showing 10% of all units having access to a wheelchair accessible car parking spaces from the onset; this must be submitted for approval before any development commences on site. The spaces should be provided on-site. Furthermore, the plan will need to demonstrate 1 residential disabled car parking space provided and retained as part of the development.</p> <p>REASON: to ensure the development is in accordance with the published London Plan 2021 Policies T6.1 Residential parking, T6.5 Non-residential disabled persons parking, and the Department for Transport's Inclusive Mobility guidance.</p> <p><u>5. Car Parking Management Plan</u></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 should be leased not sold and allocated in the following order:</p>	
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	<ol style="list-style-type: none"> 1) Wheelchair accessible units or residents with a disability with the need for a car parking space 2) Family size units 4/3 bed units 3) <p>S.106 Obligations</p> <p><u>1. Car-Free Agreement</u></p> <p>The owner is required to enter into a Section 106 Agreement to ensure that the residential units are defined as "car capped" and therefore no residents therein will be entitled to apply for a residents parking permit under the terms of the relevant Traffic Management Order (TMO) controlling on-street parking in the vicinity of the development. The applicant must contribute a sum of £4000 (four thousand pounds) towards the amendment of the Traffic Management Order for this purpose.</p> <p>Reason: To ensure that the development proposal is car-free, and any residual car parking demand generated by the development will not impact on existing residential amenity.</p> <p><u>2. Construction Logistics and Management Plan</u></p> <p>The applicant/developer is required to submit a Construction Logistics and Management Plan, 6 months (six months) prior to the commencement of development and approved in writing by the local planning authority. The applicant will be required to contribute, by way of a Section 106 agreement, a sum of £15,000 (fifteen thousand pounds) to cover officer time required to administer and oversee the arrangements and ensure highways impacts are managed to minimise nuisance for other highways users, residents, and businesses. The plan shall include the following matters, but not limited to, and the development shall be undertaken in accordance with the details as approved:</p> <ol style="list-style-type: none"> a) Routing of excavation and construction vehicles, including a response to existing or known projected major building works at other sites in the vicinity and local works on the highway. b) The estimated number and type of vehicles per day/week. c) Estimates for the number and type of parking suspensions that will be required. d) Details of measures to protect pedestrians and other highway users from construction activities on the highway. 	
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	<ul style="list-style-type: none"> e) The undertaking of a highways condition survey before and after completion. f) The implementation and use of the Construction Logistics and Community Safety (CLOCS) standard. g) The applicant will be required to contact LBH Highways to agree condition on surveys. h) Site logistics layout plan, including parking suspensions, turning movements, and closure of footways. i) Swept path drawings. <p>Reason: to ensure that the impacts of the development proposal on the local highways network are minimised during construction, and to coordinate construction activities in key regeneration areas which will have increased construction activities.</p> <p><u>3. Car Club Membership</u></p> <p>The applicant will be required to enter into a Section 106 Agreement to establish a car club scheme, including the provision of adequate car club bays and associated costs, and must include the provision of five years' free membership for all residents and £100 (one hundred pounds in credit) per year/per unit for the first 2 years.</p> <p>Reason: To enable residential occupiers to consider sustainable transport options, as part of the measures to limit any net increase in travel movements.</p> <p><u>4. Residential Travel Plan</u></p> <p>Prior to first occupation of the proposed new residential development a Travel Plan for the approved residential uses must be submitted to and approved by the Local Planning Authority detailing means of conveying information for new occupiers and techniques for advising residents of sustainable travel options. The Travel Plan shall then be implemented in accordance with a timetable of implementation, monitoring, and review to be agreed in writing by the Local Planning Authority, we will require the following measures to be included as part of the travel plan to maximise the use of sustainable modes of transport.</p> <ul style="list-style-type: none"> a) The developer must appoint a travel plan co-ordinator, working in collaboration with the Estate Management Team, to monitor the travel plan initiatives annually for a minimum period of 5 years. 	
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	<ul style="list-style-type: none"> b) Provision of welcome induction packs containing public transport and cycling/walking information to every new resident, along with a £200 voucher for active travel related equipment purchases. c) The applicant is required to pay a sum of, £3,000 (three thousand pounds) per year for a period of five years. £15,000 (fifteen thousand pounds) in total for the monitoring of the travel plan initiatives. d) Parking management plan which monitors the provision of disabled car parking spaces for the site and triggers any necessary provision on the local highways network. <p>Reason: To enable residential occupiers to consider sustainable transport options, as part of the measures to limit any net increase in travel movements.</p> <p><u>5.Highway Improvements</u></p> <p>The applicant will be required to enter into agreement with the Highway Authority under Section: 278 of the Highways Act, to pay for any necessary highway works, which includes if required, but not limited to, footway improvement works, access to the Highway, measures for street furniture relocation, carriageway markings, and access and visibility safety requirements, improved pedestrian infrastructure. The developer will be required to provide details of any temporary highways including temporary TMO's required to enable the occupation of each phase of the development, which will have to be costed and implemented independently of the main S.278 works. The works include but are not limited to: The provision of a new access on Denewood Road, removal of a redundant crossover, restatement of footways, removal of on-street parking, establishment of new parking bays, and associated road markings.</p> <p>The scheme should be design in line with the 'Healthy Streets' indicators perspective, full list of requirements to be agreed with the Highways Authority. The applicant will be required to submit detailed drawings, and a Stage 2 road safety audit of the highways works for all elements of the scheme including the details of the footpath, these drawings should be submitted for approval before any development commences on site.</p>	
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	Reason: to improve accessibility to the site by foot and to ensure that the site is in accordance with the London Plan 2021 Policy T2 Healthy Streets a to implement highway works to facilitate future access to the development site.	
<i>LBH Waste Management</i>	<p>The proposed use of communal waste containment is considered appropriate given the site's access constraints. While individual wheeled bins are preferred for street-level properties, communal bins are a practical solution where safe access for collection vehicles is limited. Weekly collections for refuse, mixed dry recycling, and food waste where bulk bins are concerned.</p> <p>It is recommended that the developer follow the original waste team guidance to allow contingency for service disruptions such as roadworks, access issues, vehicle breakdowns, or staffing shortages. Haringey's communal waste guidance is generous, and in line with the council's Recycling rate target (50% recycling by 2030), future developments should aim for a 50:50 split between refuse and recycling capacities.</p> <p>The current bin store location is optimal for collection, with drag distances within acceptable limits. If objections arise, an alternative location could be the single parking space near the entrance, subject to swept path analysis and refuse vehicle access. If feasible, this could allow for wheeled bin containment across the site.</p> <p>The three properties facing Denewood Road appear to have sufficient frontage to accommodate individual wheeled bins and could be placed on the standard fortnightly refuse and weekly recycling/food collection schedule. However, communal bin use for excess waste is likely.</p> <p>It is also recommended that the developer include a designated internal space for temporary bulky waste storage pending booked collections. Bulky items must not be left on public footways or highways, as this would be subject to environmental enforcement.</p>	<i>A condition is included for a detailed Delivery Servicing Management Plan to be submitted/approved prior to first use of the development.</i>
LBH Environmental Health (Pollution)	Thank you for re-contacting the Carbon Management Team (Pollution) regarding the above application for the erection of three buildings to provide 11 residential dwellings, amenity space, greening, cycle parking and associated works at Newstead, Denewood Road,	<i>The recommended conditions and informatives have</i>

	<p>Hornsey, London, N6 4AL and I would like to comment as it relates to this service as follows.</p> <p>Having considered the revised Air Quality Assessment, we are happy that this document addresses the points outlined in our original planning consultation comments dated 3rd October 2024. Therefore, please find our updated comments and recommended conditions below.</p> <p>Having considered the relevant applicant submitted information including: Design and Access Statement; Energy Strategy with reference 2315-IN2-ZZ-RP-Y[1]0001_Energy Strategy, prepared by IN2 dated 27 June 2024 taking note of the proposal to install Air Source Heat Pumps and PV Panels; Outline Construction Logistics Plan with reference 24043-MA-RP-D-OCLP-01-P02 - Denewood Road OCLP.docx, prepared by Markides Associates, dated 17 July 2024, taking note of section 3 (Construction Programme and Methodology), 4 (Vehicle Routing), 5 (Strategies to Reduce Impacts), 6 (Estimated Programme and Vehicle Movements), 7 (Implementing, Monitoring and Updating); Revised Air Quality Assessment with reference J10/15411B/10-F1 prepared by Air Quality Consultants Ltd., dated 8 October 2024 taking note of section 5 (Baseline Conditions), 6 (Construction Phase Assessment), 7 (Operational Phase Assessment), 8 (Air Quality Neutral), please be advised that we have no objection to the proposed change of use in respect of land contamination but the following planning conditions and informative are recommend should prior approval for the change of use be granted.</p> <p>1. Land Contamination Before development commences other than for investigative work:</p> <p>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.</p> <p>b. Using this information, a diagrammatical representation (Conceptual Model) for the site of all potential contaminant sources, pathways and receptors shall be produced. The desktop study and Conceptual Model shall be submitted to the Local Planning Authority. If the desktop study and Conceptual Model indicate no risk of harm, development shall not commence until approved in writing by the Local Planning Authority.</p> <p>c. If the desktop study and Conceptual Model indicate any risk of harm, a site investigation shall be designed for the site using information obtained from the desktop study and Conceptual Model. The site investigation must be comprehensive enough to enable; a risk</p>	<p><i>been added to the draft decision notice.</i></p> <p><i>There was a typo made by the Pollution Officer in their updated comments with regards to the air quality contribution figure, which is set out in the applicant AQA to be £51, 580.29 and not £33, 850.29.</i></p>
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	<p>assessment to be undertaken, refinement of the Conceptual Model, and the development of a Method Statement detailing the remediation requirements.</p> <p>d. The risk assessment and refined Conceptual Model shall be submitted, along with the site investigation report, to the Local Planning Authority which shall be submitted to, and approved in writing by, the Local Planning Authority prior to that remediation being carried out on site.</p> <p>e. Where remediation of contamination on the site is required, completion of the remediation detailed in the method statement shall be carried out and a report that provides verification that the required works have been carried out, shall be submitted to, and approved in writing by the Local Planning Authority before the development is occupied.</p> <p>Reason: To ensure the development can be implemented and occupied with adequate regard for environmental and public safety.</p> <p>2. Unexpected Contamination</p> <p>If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until a remediation strategy detailing how this contamination will be dealt with has been submitted to and approved in writing by the Local Planning Authority. The remediation strategy shall be implemented as approved.</p> <p>Reasons: To ensure that the development is not put at unacceptable risk from, or adversely affected by, unacceptable levels water pollution from previously unidentified contamination sources at the development site in line with paragraph 109 of the National Planning Policy Framework.</p> <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>	
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	<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 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 Local Planning Authority. 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 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 demolition or any construction work of the existing buildings, an asbestos survey should be carried out to identify the location and type of asbestos containing materials. Any asbestos containing materials must be removed and disposed of in accordance with the correct procedure prior to any demolition or construction works carried out.</p>	
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	<p>Updated comments after re-consultation, received 10/09/2025</p> <p>Thank you for re-contacting the Carbon Management Team (Pollution) regarding the above application for the Erection of three buildings to provide 11 residential dwellings, amenity space, greening, cycle parking and associated works (amended plans) at Newstead, Denewood Road, Hornsey, London, N6 4AL and I would like to comment as it relates to matters of this service as follows.</p> <p>Having considered the relevant applicant submitted information including: Design and Access statement prepared by Reddy Architecture + Urbanism, dated 13th November 2024; Landscape Design and Access Statement prepared by Cameo & Partners, dated August 2025 taking note of proposed private and communal soft landscaping; Energy Strategy with reference 2315-IN2-ZZ-RP-Y[1]0001_Energy Strategy prepared by IN2 dated 26th July 2024, taken note of the proposal to install Air Source Heat Pumps and PV panels ; Air Quality Assessment with reference J10/15411B/10-F1 prepared by Air Quality Consultants Ltd., dated 8 October 2024, taking note of sections 4 (Assessment Approach), 5 (Baseline Conditions), 6 (Construction Phase Impact Assessment), 7 (Operational Phase Impact Assessment), 8 (Air Quality Neutral), 9 (Mitigation), 10 (Conclusions), please be advised that we have no objection to the proposed change of use in respect of land contamination but the following planning conditions and informative are recommend should prior approval for the change of use be granted.</p> <p>1. Land Contamination Before development commences other than for investigative work:</p> <p>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.</p> <p>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</p>	
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	<p>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.</p> <p>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.</p> <p>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.</p> <p>Reason: To ensure the development can be implemented and occupied with adequate regard for environmental and public safety</p> <p>2. Unexpected Contamination</p> <p>If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until a remediation strategy detailing how this contamination will be dealt with has been submitted to and approved in writing by the Local Planning Authority. The remediation strategy shall be implemented as approved.</p> <p>Reasons: To ensure that the development is not put at unacceptable risk from, or adversely affected by, unacceptable levels water pollution from previously unidentified contamination sources at the development site in line with paragraph 109 of the National Planning Policy Framework.</p> <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>	
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	<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 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 Local Planning Authority. 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 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>6. Air Quality Neutral– Planning Obligation</p> <p>As outlined in the applicant submitted Air Quality Assessment, the development is not considered to be Air Quality Neutral and therefore an off-setting payment of £33,850.29 is</p>	
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	<p>required. Payment should be collected via section 106 agreements, expected to be paid in full prior to the occupation of the development and will contribute towards measures to reduce local emissions or concentrations.</p> <p>Reason: In-line with the Air Quality Neutral London Planning Guidance and Policy SI 1 of the London Plan.</p> <p>Informative:</p> <p>1. Prior to demolition or any construction work of the existing buildings, an asbestos survey should be carried out to identify the location and type of asbestos containing materials. Any asbestos containing materials must be removed and disposed of in accordance with the correct procedure prior to any demolition or construction works carried out.</p>	
LBH Arboriculture	<p>From an arboricultural point of view, and further to PREAPP discussions, I hold no objections to the proposal.</p> <p>An Arboricultural survey, impact assessment and method statement has been submitted by Partick Stileman Ltd dated 15/07/2024.</p> <p>The report has been carried out to British Standard 5837: 2012 Trees in relation to design, demolition and construction- Recommendations.</p> <p>I concur with much of the report including the tree quality classification.</p> <p>T2 Norway Maple is no longer being removed.</p> <p>Landscape plans have been submitted.</p> <p>The Biological Net Gain (BNG) has not been met but off site planting is being agreed. The BNG, Ecological report and off site planting will need addressing by the appropriate Officer.</p> <p>Providing all of the Arboricultural document is conditioned including the tree protection plan I hold no objections.</p>	<p><i>Noted. A landscaping scheme for the development shall be conditioned. The development will be conditioned to be carried out in accordance with the approved arboricultural method statement to ensure the safety and wellbeing of affected trees on site during the construction works. The Biodiversity Net Gain deficit shall be addressed off-site to ensure a 10% net gain. This will be</i></p>

		<i>required by condition and Section 106 agreement.</i>
Local Flood and Water Management Lead	<p>Thank you for re-consulting us on the above planning application reference number HGY/2024/2168 for Erection of three buildings to provide 11 residential dwellings, amenity space, greening, cycle parking and associated works at Newstead, Denewood Road, Hornsey, London, N6 4AL.</p> <p>As we understood, this is 14 day re-consultation following the receipt of amended drawings and revised documents, therefore, having reviewed the applicant's submitted :</p> <ol style="list-style-type: none"> 1. Drainage and SuDS strategy report reference number 23727-BMC-XX-XX-RP-C-0001 dated 15th July 2024 as prepared by Barrett Mahony Civil and Structural Consulting Engineers, and 2. Additional drainage calculations for all storms up and including the 7 days 24 hours for all return period showing results of critical storms, and results of all the storms dated 3rd September 2024 as prepared by Barrett Mahony Consultant, <p>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 build, manage and maintain as per the above referred Flood Risk Assessment / Drainage Design report, we are content that the impact of surface water drainage have been adequately addressed.</p>	<i>Noted. The Drainage and SuDS strategy report shall form part of the approved documents for the proposal.</i>
LBH Policy	<p><u>Key designations</u></p> <ul style="list-style-type: none"> • Highgate Conservation Area • Adjacent locally listed building <p><i>The site lies within the Highgate Neighbourhood Plan Area and so relevant policies of the adopted Highgate Neighbourhood Plan apply to this scheme.</i></p> <p><u>Principle of development</u></p> <p>The site is a small (less than 0.25ha) vacant brownfield site that formerly housed a care home, now demolished. There is an extant permission for 13 residential homes on the site. London Plan Policy H1 and H2 supports the optimal delivery of housing on brownfield sites, and emphasises the role small sites have in meeting housing need. Haringey's Local Plan</p>	<i>Noted</i>

	<p>seeks to maximise the delivery of homes on suitable brownfield sites (Policy S1), with an emphasis on delivering a mix of unit sizes suitable for the site and family sized affordable homes (Policy DM11). Policy SC1 of the Highgate Neighbourhood Plan also provides support for optimising the use of sites to help create communities that are inclusive with a mix of housing types and tenures. Therefore the principle of residential uses on this site are established and acceptable in principle.</p> <p><u>Quantum of development</u></p> <p>Policy SP2 requires that new development meets the density levels set out in the Density Matrix of the London Plan. In July 2021 the Mayor published the new London Plan. This moves away from the use of a density matrix to a design led approach to capacities to deliver appropriate densities. This approach is consistent with DM11 which expects optimum housing potential of a site to be determined through a rigorous design-led approach. The quantum of 11 residential use can therefore be supported in principle, subject to detailed comments on the form and massing from the Council's Design Officer.</p> <p><u>Mix of housing</u></p> <p>Policy DM11 of the Development Management DPD requires that proposals for new residential development should provide a mix of housing. The scheme proposes a total of 11 residential units. This is a reduction in two residential units compared to the extant permission. The mix should have regard to: a. Individual site circumstances, including location, character of its surrounds, site constraints and scale of development proposed. Given the context of surrounding larger family residential homes, and the need for family homes in the Borough as noted in the Haringey SHMA, a mix of 4, 3 bed and 7, 4 bed houses is considered acceptable.</p> <p><u>Affordable Housing</u></p> <p>The London Plan (2021) seeks to maximise affordable housing provision and Policy SP2 of the Strategic Policies requires that sites capable of delivering 10 units or more to meet a Borough wide affordable housing target of 40%, based on habitable rooms. Policy DM13 requires on-site provision of affordable housing, however in exceptional circumstances off-site contributions may be acceptable where the development secures a higher level of</p>	
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	<p>affordable housing on an alternative site, secures a more inclusive and mixed community and better address priority housing needs.</p> <p>It is noted that applicant site is small, and so the delivery of 40% affordable housing on site (4 units) is unlikely to be deliverable given there is no interest from a Registered Provider to take on 4 units in isolation. This number of units it is below the amount needed to make it feasible to manage the units. Therefore, and as previously accepted under the extant planning permission HGY/2018/3205, a financial contribution towards affordable housing off site will be acceptable in this instance. The amount secured should enable the delivery of at least 5 affordable units and so exceeding the site requirement, and will enable the affordable housing to be provided on an alternative site in Haringey where management can be secured, and to help in addressing housing needs.</p> <p><u>Amenity and Biodiversity</u></p> <p>It is noted that all residential units will achieve the minimum amenity provision required by London Plan Policy D4 and the Mayors Housing SPG standards, and that a net gain in biodiversity on site will also be achieved. 107 sqm of children place space is proposed as part of the proposals. The space will accommodate the requirements of a range of ages and is just above the policy requirement of 99.3 sqm. There are therefore no in principal objections to the scheme on this basis.</p> <p>Comments on heritage, transport, energy and design are provided by other teams within the Council.</p>	
LBH Design	<p><u>Context</u></p> <ol style="list-style-type: none"> 1. The site, formerly occupied by the Newstead Nursing Home, is located in the Bishops Area of the Highgate Conservation Area. It sits within an established residential street and is located near the corner of Denewood Road and Broadlands Road, backing onto View Close to the Northwest, and an open parking court and garage area to the Northeast. 2. The site has an extant planning permission (ref: HGY/2018/3205) for the demolition of the existing structure and the erection of three new two- and three-storey buildings, 	<i>Noted</i>

	<p>comprising 13 residential apartments, including one-, two- and three-bedroom units, alongside private and community amenity spaces, and an extensive basement.</p> <p>3. The revised scheme seeks to deliver 11 terrace houses, with a housing mix comprising three- and four- bedroom family homes, while retaining similar materials, massing, and built form as the approved scheme. Additionally, the proposal replaces the basement car park with surface-level parking. The revised scheme is endorsed by the council for delivering high-quality family homes in an area well served by open spaces and local amenity, and for delivering improved environmental and sustainability outcomes by eliminating the basement.</p> <p><u>Height, Form, Bulk, Massing & Layout</u></p> <p>4. The immediate built environment comprises buildings ranging between 2-3 storey in height, with the exception of 20 Broadlands Road and Broadlands Lodge which are 4.5 and 6 storeys respectively. The proposed development articulates Terrace A as 3 storeys; Terrace B is reduced in height by 1.5m through a split level and Terrace C incorporates loft rooms resulting in an intermediate 2.5 storey typology. This graduated variation in height and volumetric expression responds sensitively to the scale and rhythm, particularly along View Close and Denewood Road.</p> <p>5. The positioning of the terrace blocks attempts to maximise the separation distances from neighbouring properties thereby minimizing overlooking impacts. The architectural layouts address privacy concerns through staggered balconies preventing direct sightlines, and back gardens acting as buffer zones between blocks. Soft landscaping, including the introduction of a mature tree to the front boundary with 10 Willowdene, along with the retention of the hedge to site boundary with 6 View Close and existing trees on western boundary to 2A Denewood Road, enhance the green buffer and reinforce visual screening.</p> <p>6. The scheme, however, includes the removal of 8 trees from the northern, eastern and western boundaries. It compensates for their loss by 30 replacement planting of mature and semi-mature trees across the site. This includes the introduction of a sound absorbent fencing in area adjacent to the children's play area on the boundary with 2A Broadlands Lodge.</p>	
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Elevational Composition, Fenestration and Materiality

7. The Bishops area is distinguished by wide ranging architectural styles, most notably the Arts and Crafts vernacular. The proposed development interprets this tradition in a contemporary manner, incorporating design details and a material palette that complement the character of the conservation area. Architectural elements such as pitched roofs, projecting dormers, brick window heads and sills, stack bonded soldier courses, feature stone window surrounds and metal railings are expressed in a manner typical of the local vernacular. Additionally, the fenestration design and brick facades emulate the dominant red, orange and brown brick tones within the conservation area.
8. Although the frontage building, is not set as far back as the extant scheme, it follows the building line established by Courtyard House. The proposed front yards feature large multi-stemmed trees and additional greening, creating a soft, welcoming transition between the development's threshold and the public realm. A contextually appropriate dwarf brick boundary wall, punctuated by a few brick piers topped with metal railings, allows visual permeability and seamlessly integrates the landscaping to create a lush, verdant streetscape.

Residential Quality (Flat Layouts and Amenity Space)

9. The site has been designed as a gated development to limit the requirement for external vehicle access and to provide a pedestrian friendly environment for its inhabitants. The three terraces A,B and C provide diverse housing layouts options with stacked storeys, split levels and lofts respectively, resulting in greater variation in the unit mix across the site. All homes meet part M4(2) of the building regulations while one home is designated as an accessible dwelling designed to meet the space standards for part M4(3). All homes are dual aspect, and the end of terrace homes benefit from a triple aspect.
10. High quality landscape design provides a range of private and communal amenity space including private terraces, balconies and rear gardens, as well as a community garden and informal play space. The scheme has evolved over time **to provide more**

	<p>open space in the centre of the site, and the landscaping has been designed to provide level access to all dwellings.</p> <p><u>Daylight Sunlight</u></p> <p>11. The development complies with the requirements set out by the BRE guidance and does not unreasonably impact the daylight or sunlight to neighbouring dwellings. While some windows at 2A Denewood road are affected by the development and fail the Vertical Sky Component (VSC) test, they pass the No Skyline Assessment. According to the BRE decision chart, spaces are considered impacted only when they fail both of these assessments. Furthermore, the impacted windows - W6, W8, W13 - are secondary windows serving the space, which is primarily illuminated by large floor to ceiling east facing windows.</p> <p>12. The internal daylight and sunlight assessment for the proposed developments units confirm that all rooms and units exceed minimum recommendations of the BRE Guide using Spatial Daylight Autonomy (SDA) and Exposure to Sunlight (ETS) methods respectively. Further all proposed amenity spaces receive at least 2 hours of direct sunlight on March 21st thus achieving compliance with the BRE Guide.</p>	
EXTERNAL		
Thames Water	<p>Waste Comments</p> <p>The proposed development is located within 15 metres of a strategic sewer. Thames Water requests the following condition to be added to any planning permission. "No piling shall take place until a PILING METHOD STATEMENT (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) and piling layout plan including all Thames Water wastewater assets, the local topography and clearance between the face of the pile to the face of a pipe has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement and piling layout plan. Reason: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to</p>	<p>The comments from Thames Water are noted. Standard conditions/informatives as recommended have been added to the draft decision notice.</p>

significantly impact / cause failure of local underground sewerage utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. <https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes> Should you require further information please contact Thames Water.

Email: developer.services@thameswater.co.uk Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB

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 Policy SI 13 Sustainable drainage of the London Plan 2021. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. Should you require further information please refer to our website. <https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes>

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

	<p>may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 020 3577 9483 or by emailing trade.effluent@thameswater.co.uk . Application forms should be completed on line via www.thameswater.co.uk. Please refer to the Wholesale; Business customers; Groundwater discharges section.</p> <p>Thames Water would advise that with regard to WASTE WATER NETWORK and SEWAGE TREATMENT WORKS infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.</p> <p>Thames Water would recommend that petrol / oil interceptors be fitted in all car parking/washing/repair facilities. Failure to enforce the effective use of petrol / oil interceptors could result in oil-polluted discharges entering local watercourses.</p> <p>Water Comments</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>	
Met Police	<p><i>Comments received 01/11/2024 prior to applicant meeting Met Police</i></p> <p>With reference to the above application we have had an opportunity to examine the details submitted and would like to offer the following comments, observations and</p>	Noted. Recommended conditions on details for SBD accreditation

	<p>recommendations. These are based on relevant information to this site (Please see Appendices), including my knowledge and experience as a Designing Out Crime Officer and as a Police Officer.</p> <p>It is in our professional opinion that crime prevention and community safety are material considerations because of the mixed use, complex design, layout and the sensitive location of the development. To ensure the delivery of a safer development in line with L.B. Haringey DMM4 and DMM5 (See Appendix), we have highlighted some of the main comments we have in relation to Crime Prevention (Appendices 1).</p> <p>At this stage we have not met with the original project Architects to discuss Crime Prevention and Secured by Design at pre-application stage to discuss our concerns regarding the design and layout of the development. There is no mention of crime prevention or Secured by Design in the Design and Access Statement referencing design out crime or crime prevention. We request that the developer contacts us at the earliest convenience to ensure that the development is designed to reduce crime at an early.</p> <p>At this point it can be difficult to design out fully any issues identified, at best crime can only be mitigated against, as it does not fully reduce the opportunity of offences. Whilst in principle we have no objections to the site, in light of the changes to the original design 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.</p> <p>The project has the potential to achieve a Secured by Design Accreditation if advice given is adhered to.</p> <p>Section 2 - Secured by Design Conditions and Informative:</p> <p>In light of the information provided, we request the following Conditions and Informative:</p> <p>Conditions:</p>	<p>and certification have been included.</p>
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	<p>A. Prior to the commencement of above ground works of each building or part of a building, details shall be submitted to and approved, in writing, by the Local Planning Authority to demonstrate that such building or such part of a building can achieve 'Secured by Design' Accreditation. Accreditation must be achievable according to current and relevant Secured by Design guide lines at the time of above grade works of each building or phase of said development.</p> <p>The development shall only be carried out in accordance with the approved details.</p> <p>B. Prior to the first occupation of each building, or part of a building or its use, 'Secured by Design' certification shall be obtained for such building or part of such building or its use and thereafter all features are to be retained.</p> <p>Reason: In the interest of creating safer, sustainable communities.</p> <p>Informative:</p> <p>The applicant must seek the continual advice of the Metropolitan Police Service Designing Out Crime Officers (DOCOs) to achieve accreditation. The services of MPS DOCOs are available free of charge and can be contacted via docomailbox.ne@met.police.uk or 0208 217 3813.</p> <p>Section 3 - Conclusion:</p> <p>We would ask that our department's interest in this planning application is noted and that we are advised of the final Decision Notice, with attention drawn to any changes within the development and subsequent Condition that has been implemented with crime prevention, security and community safety in mind.</p> <p>Should the Planning Authority require clarification of any of the recommendations/comments given in the appendices please do not hesitate to contact us at the above office.</p> <p><i>Comments following meeting between applicant & Met Police on 26/11/24 and revisions to position of front gate and introduction of pedestrian path.</i></p>	
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As a compromise this would work for our requirements, if the architects could show a visual representation it would be appreciated.

Met Police comments received 19/09/2025

Section 1 - Introduction:

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).

At this stage we have met with the original project Architects to discuss Crime Prevention and Secured by Design at pre-application stage to discuss our concerns regarding the design and layout of the development. There is no mention of crime prevention in the Design and Access Statement referencing design out crime or crime prevention. We request that the developer contacts us at the earliest convenience to ensure that the development is designed to reduce crime at an early.

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, in light of the changes to the original design 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 a Secured by Design Accreditation if advice given is adhered to.

Section 2 - Secured by Design Conditions and Informative:

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

Conditions:

- A. Prior to the commencement of above ground works of each building or part of a building, details shall be submitted to and approved, in writing, by the Local Planning Authority to demonstrate that such building or such part of a building can achieve '**Secured by Design**' Accreditation. Accreditation must be achievable according to current and relevant **Secured by Design** guide lines at the time of above grade works of each building or phase of said development.
The development shall only be carried out in accordance with the approved details.
- B. Prior to the first occupation of each building, or part of a building or its use, '**Secured by Design**' certification shall be obtained for such building or part of such building or its use and thereafter all features are to be retained.

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 or 0208 217 3813.

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.

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

<p><i>Transport for London</i></p>	<p>Having assessed the proposals, we can confirm that TfL has no comments to make on this planning application regarding strategic transport issues. We would, however, expect the application to be determined in line with relevant London Plan policy and guidance plus that issued by TfL including the Mayor's Transport Strategy.</p> <p>Please contact us if you consider that there are any strategic as opposed to local transport issues raised by this case.</p>	<p>Noted. The application has been assessed against relevant national, London and local plan policy with regards to transportation considerations.</p>
<p>NEIGHBOURING REPRESENTATIONS (SUMMARY OF ISSUES)</p>	<p><i>Land Use and housing</i></p> <ul style="list-style-type: none"> - The density of development is considered excessive for the location of the site - Absence of evidence of planned increased infrastructure provision in locality in response to increased number of residents - A smaller scale lower density development with a greater range of dwelling sizes/apartments would address many of the concerns being raised <ul style="list-style-type: none"> - There are restrictive covenants that protect the right to light and air of neighbouring properties that need to be respected. 	<p>The issues of scale/density of development and resultant impacts are considered within the material planning considerations sections of the report, but are considered to be acceptable with regards to design and character considerations.</p> <p>Officer comment: Whilst it will be necessary for the applicant to ensure all legal matters regarding the development are resolved in order to implement any planning consent, matters of ownership are not a material</p>

	<p><i>Impact on the Conservation Area</i></p> <p><i>Size, Scale and Design</i></p> <ul style="list-style-type: none"> - There is a lack of set-back from the building line of neighbouring properties, which undermines the uniformity of the street scene. The lack of set-back fails to preserve or enhance the character and appearance of the conservation area. - The front balconies are out of keeping with development in the locality - There would be a negative impact on the street scene through the placement of the waste/recycle store - There are inaccuracies in the street elevation drawings not showing nos. 2A and 2 Denewood Road - Willowdene properties shown to be bigger than they are on street elevations - Broadlands Lodge shown on street elevations far more prominently than reality <p><i>Standard of accommodation</i></p>	<p>planning consideration that can impact on the assessment of the planning application.</p> <p>This matter is considered in the design and heritage sections of the report. This issue has been addressed to some degree through the submission of revised plans which have set the building back slightly further from the front boundary, and introduced additional soft landscaping.</p> <p>Officer comment: Issues with inaccuracies in the plans have been addressed through the submission of revised plans.</p>
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	<ul style="list-style-type: none"> - Insufficient child play space provided for the development <p><i>Parking, Transport and Highways</i></p> <ul style="list-style-type: none"> - The development will result in increased traffic - The development should provide additional off-street parking - Increased pressure on on-street parking capacity in the locality - Absence of separate pedestrian pathway in the site - The shared access road/is too narrow for 2-way traffic and is not considered wide enough for an emergency vehicle - There is a lack of pedestrian site splay to ensure the safety of pedestrians walking past the site - Single lane access could result in vehicles having to reverse out with limited site lines <p><i>Waste and Recycling</i></p> <ul style="list-style-type: none"> - Excessive distance for residents to travel to reach communal waste storage area - Insufficient waste/recycling storage capacity and space provided for future occupants 	<p>The development provides 107m² child play space which exceeds the 99.3m² requirement using the GLA Population Yield Calculator, and is of a satisfactory standard.</p> <p>Revised plans introduced a separate pedestrian entrance into the site, and a layby within the site to allow cars making egress to pull-in to allow vehicles entering into the site sufficient space to pass. The Transportation & Parking section of the report addresses matters of traffic, parking, access in more detail. Conditions have been included to ensure matters of parking and highway safety are adequately addressed.</p>
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	<ul style="list-style-type: none"> - Location of communal waste/recycle store adjacent to Courtyard House will result in loss of light, noise and odour pollution - Absence of space for storage of bulky waste <p><i>Residential Amenity</i></p> <ul style="list-style-type: none"> - There will be a visually overbearing impact on 2 and 2A Denewood Road from Terrace C - Terrace C will result in a loss of light, privacy and outlook from patio, garden and living areas of 2A Denewood Road - Nos. 2A and 2 Denewood Road not shown on the Daylight & Sunlight Analysis. 	<p>Whilst noted the travel distance is sizeable, it is not sub-standard to an extent that would warrant refusal. The level of waste storage has been reviewed by Council Waste Officers and deemed acceptable subject to the weekly collections undertaken for communal residential waste. The waste store is fully enclosed with no ventilation facing the boundary with Courtyard House. Such matters are considered in more detail in the Waste & Recycling section of the report. Further details of the enclosure and a Delivery, Servicing and Waste Management Plan are to be conditioned.</p>
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	<ul style="list-style-type: none"> - Loss of outlook resulting from development - Excessive loss of daylight and sunlight by neighbouring occupants - Loss of privacy, particularly with regards to no. 6 View Close, where there is a gap of only between 10-13 metres between units 4 and 5 to the bedroom windows. 	<p>Officer comment: An updated Daylight & Sunlight assessment was submitted that included the windows of no. 2a Denewood Road within the assessment. Whilst no. 2 Denewood Road does not appear to have been included in the latest analysis, no. 2a is the immediately adjacent neighbour to Terrace C of the development and therefore the more sensitive property of the pair with regards to the assessment of light conditions. All tested windows pass the relevant assessments with regards to daylight and sunlight.</p> <p>The development has been found to be acceptable with regards to the impact on natural light and sunlight conditions for</p>
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	<ul style="list-style-type: none"> - The sunken seating area of Terrace B may have an impact on the water table which could create settlement problems for no. 6 View Close. Management of maintenance of the boundary fence and landscaping should be made to be the developers. - The drag distance of waste/recycling store from blocks B and C will result in noise disturbance for neighbouring residents - The location of play area adjacent to Courtyard House and 2 Denewood Road would give rise to noise disturbance - Terrace C will overlook Courtyard House - Noise from ASHPs. Lack of clarity if they will cause noise disturbance - The noise impact assessment does not include property 2A Denewood Road despite it being immediately adjacent to terrace C - Block A will have an unacceptable impact on adjacent Willowdene property - Light pollution from terrace C on Broadlands Lodge - Location of bin store close to Courtyard will give rise to odour disturbance. The bin store would likely be higher than the boundary wall - No consideration given to the storage of white/bulky goods. 	<p>neighbouring occupants.</p> <p>The engineers employed by the applicant have outlined in a response dated 08/09/25 that the impact of the relatively shallow sunken gardens on groundwater flows will be negligible, outlining the proposal will not have a material impact on groundwater levels and no resultant settlement is anticipated.</p> <p>The updated Noise Impact Assessment included no. 2a Denewood Rd in the assessment.</p>
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	<ul style="list-style-type: none"> - Concern that the bin store has insufficient space to accommodate required level of refuse, recycling and food waste storage for a development of this scale. <p><i>Environment and Public Health</i></p> <ul style="list-style-type: none"> - Increased risk of flood risk during excessive rainfall events - What will be done to improve air quality in and around Denewood Road - Loss of trees would result in development not complying with biodiversity net gain requirements and offsite planting 	<p>Other matters of light, noise, outlook, privacy and other related matters are considered in the Impact on Amenity of Adjoining Occupiers section of the report.</p> <p>The proposal has been reviewed by the Local Lead Flood Risk Authority who has outlined sufficient information has been provided to demonstrate that the impact on surface water drainage has been adequately addressed.</p> <p>A financial contribution of £51,580.29 to account for the shortfall in meeting air quality neutrality requirements with regards to transport emissions over a 30-year period shall be secured as part of the</p>
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	<ul style="list-style-type: none"> - Additional habitat, planting and green open space should be added to the site <p><i>Trees and biodiversity</i></p> <ul style="list-style-type: none"> - There is a lack of clarity with regards to which trees have been felled in connection with the previous consent in the current AIA. Some are proposed to be felled for convenience of development. - Trees 6-13 need protection to provide screening of development - The development results in a loss of biodiversity - Impact of development on Acer tree adjacent to proposed bin store <p>Local groups/societies representations</p>	<p>Section 106 agreement.</p> <p>An offsite biodiversity gain management and monitoring plan to ensure a 10% net gain shall be secured as part of the section 106 agreement.</p> <p>The applicant has sought to include as much habitat, planting and green space as is possible within the site around the development.</p> <p>The submitted AIA outlines that most trees but not all which were shown for removal in the previous scheme were removed by the previous developers. The Council Arboricultural Officer has reviewed the scheme and found the proposal to be acceptable from an</p>
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	<p><u>Highgate CAAC:</u></p> <ul style="list-style-type: none"> - The scale of the development will be visually obtrusive to neighbours - Insufficient set-back of the front terrace. - Block A will have an unacceptable impact on the adjacent Willowdene property - Privacy concerns regarding the relationship between the proposed and existing properties - There is likely to be a noise impact on Goldsmiths Cottages from the positioning of the play area - Development overall out of keeping with Bishops' area of Highgate CA - Concerns of layout, form and entrance to the dwellings. - Poor levels of daylight received by some kitchens within development - The BNG level is very low and should have been based on 2018 levels <p><u>Highgate Neighbourhood Forum:</u></p> <ul style="list-style-type: none"> - The biodiversity assessment should have been carried out on the basis of the pre-degradation habitat type as the site baseline. More habitat and ecological mitigation/green space should be added to the site. 	<p>arboricultural perspective with suitable conditions applied.</p> <p>These matters concerning design, heritage and neighbouring amenity impact are addressed within the relevant sections of the material planning considerations of the report</p> <p>Works by the previous developer to implement the extant planning permission HGY/2018/3205 will have inevitably resulted in a reduced biodiversity value if it was against the current condition of the site, but this consent was granted prior to</p>
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	<ul style="list-style-type: none"> - The development building line is too close to the pavement. Additional planting should be provided on the boundary - There should be a management and maintenance plan to ensure the sustainability of any planting for the required period. <p><u>Highgate Society:</u></p> <ul style="list-style-type: none"> - Whilst the latest plans are an improvement in comparison to the previously consented scheme, the proposal still represents an overdevelopment of the site and breaches a number of design standards, causing harm to the conservation area. - The front block has been moved forward from consented scheme which will have adverse impact on the street scene, worsened by the step in the terrace, it would be dominant and have a deleterious effect on the conservation area. 	<p>the introduction of 10% Biodiversity Net Gain legislation in 2024. It would therefore be considered unreasonable to apply the pre-degradation biodiversity value of the site as the baseline.</p> <p>Amended plans have seen the building line of terrace A slightly set-back from the original submission with additional front boundary planting added. The issue has been considered in more detail in the design and heritage sections of the report.</p> <p>A Biodiversity Net Gain Plan shall be conditioned and part of the Section 106 agreement which will include details of management responsibilities and maintenance schedules.</p>
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	<ul style="list-style-type: none"> - Insufficient parking has been provided which may lead to occupants using access to parking permits, increasing pressure on on-street parking capacity. - Deliveries will likely take place from Denewood Road, which will cause congestion. - The height and density of the scheme is excessive, exacerbated by spartan, featureless, unmodulated design. - Poor positioning of the refuse store, in terms of close proximity to Courtyard House, travel distance for occupants to store, and vehicle safety - Private amenity spaces are smaller than rest of conservation area - Communal amenity spaces and child play areas are insufficient in scale - Lack of privacy for windows of 6 View Close by virtue close proximity of unit 4 - Height and positioning of development will result in light issues for 2a Denewood Road and 6 View Close. - There is a lack of greenery in the development - Objection to the loss of trees 	<p>These matters are considered in the design and heritage sections of the report.</p> <p>The development is recommended to be subject to a car-free agreement which will remove the rights of future occupants to obtain parking permits to be used in the CPZ. This will be included within the S.106 agreement.</p> <p>The Transportation Team have reviewed the scheme and found it to be acceptable with regards to highway and parking considerations. A delivery and servicing plan will be secured by condition.</p> <p>All of these matters are addressed in the design, heritage, amenity, standard of</p>
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		accommodation and urban greening/tress sections of the report.
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