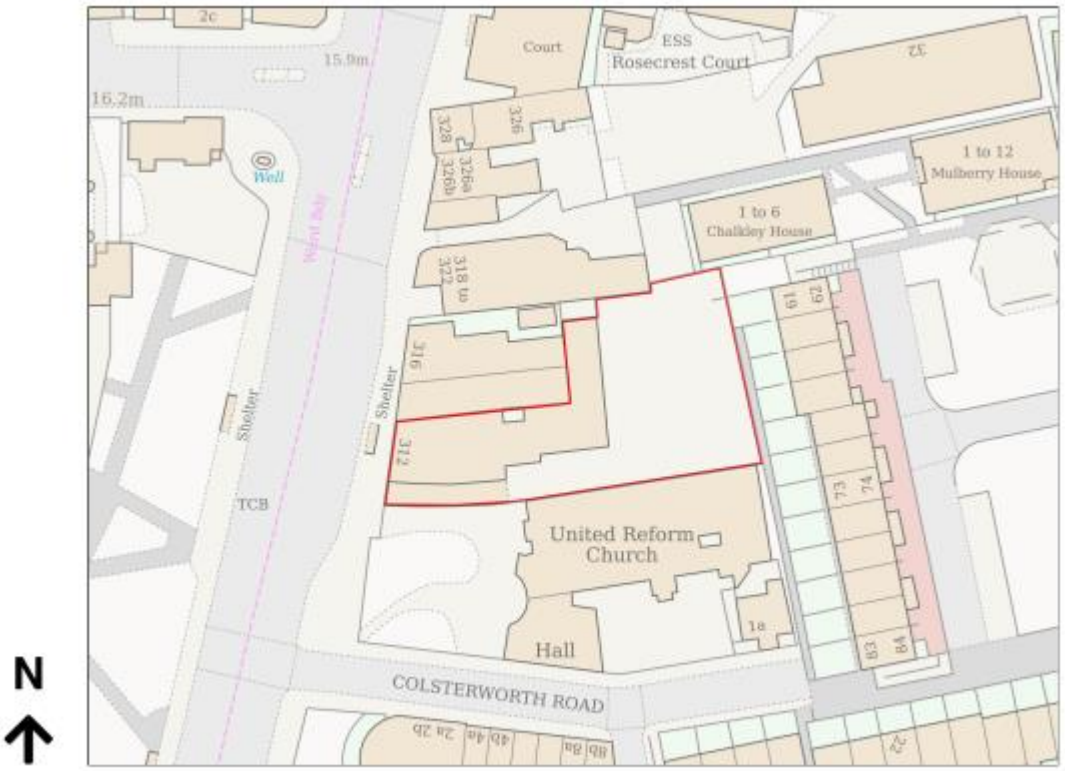
APPENDIX 2 – PLANS AND IMAGES



Site location plan

Birds eye view

Site photos (Original building)

The Site, 312 High Road Tottenham, with previous pink and grey cladding

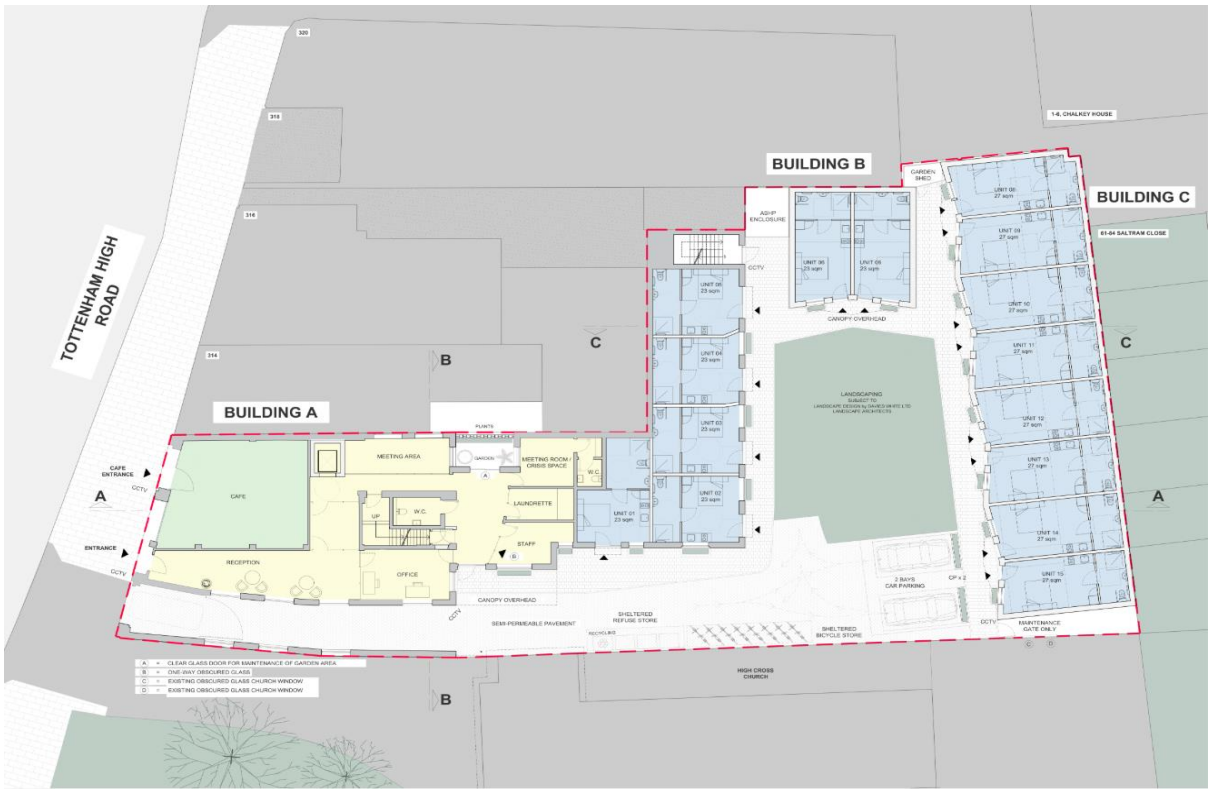
Side elevation of the Site and association with adjacent church and grounds

Extant front elevation with most cladding removed.

Rear elevation of 312 High Road Tottenham, with area of car parking to the rear.

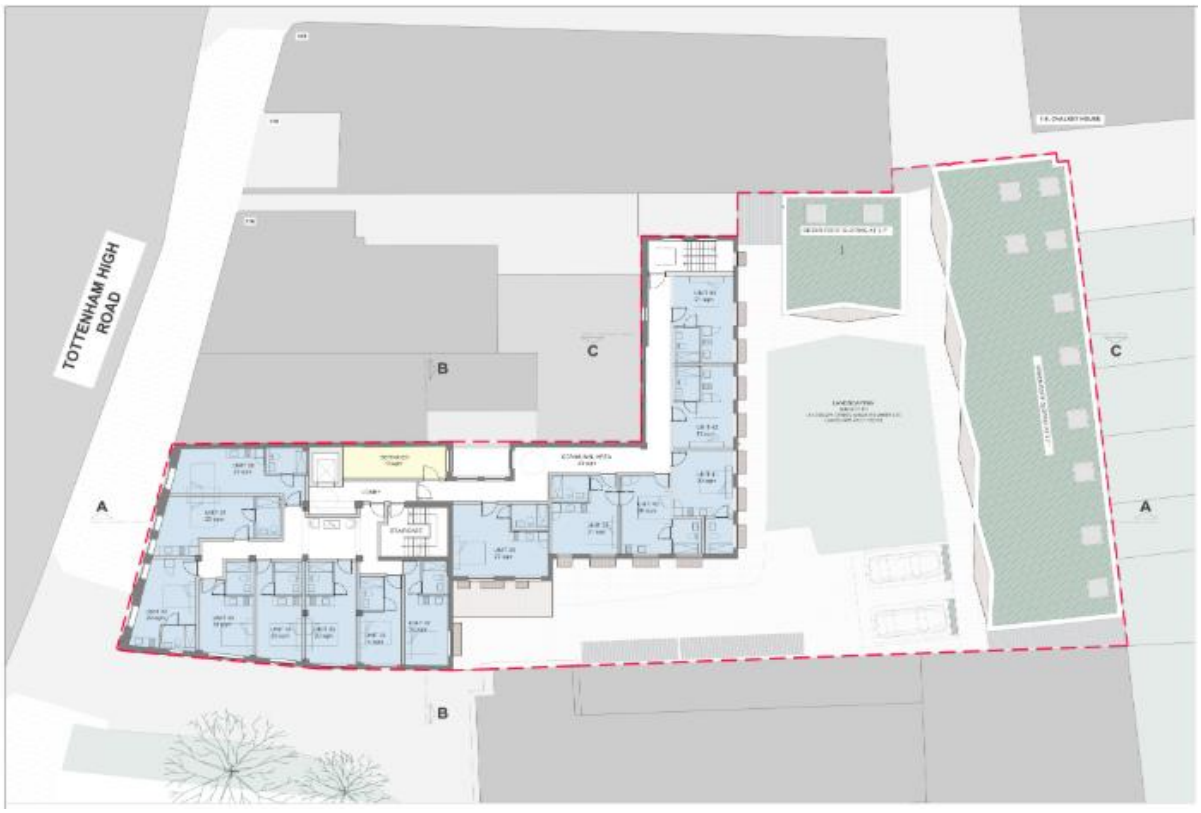
The eastern edge of the High Road includes a range of nineteenth century buildings in the foreground, with the Site and taller residential blocks in the distance.

View south-north along High Road illustrating large scale building to north of Site.



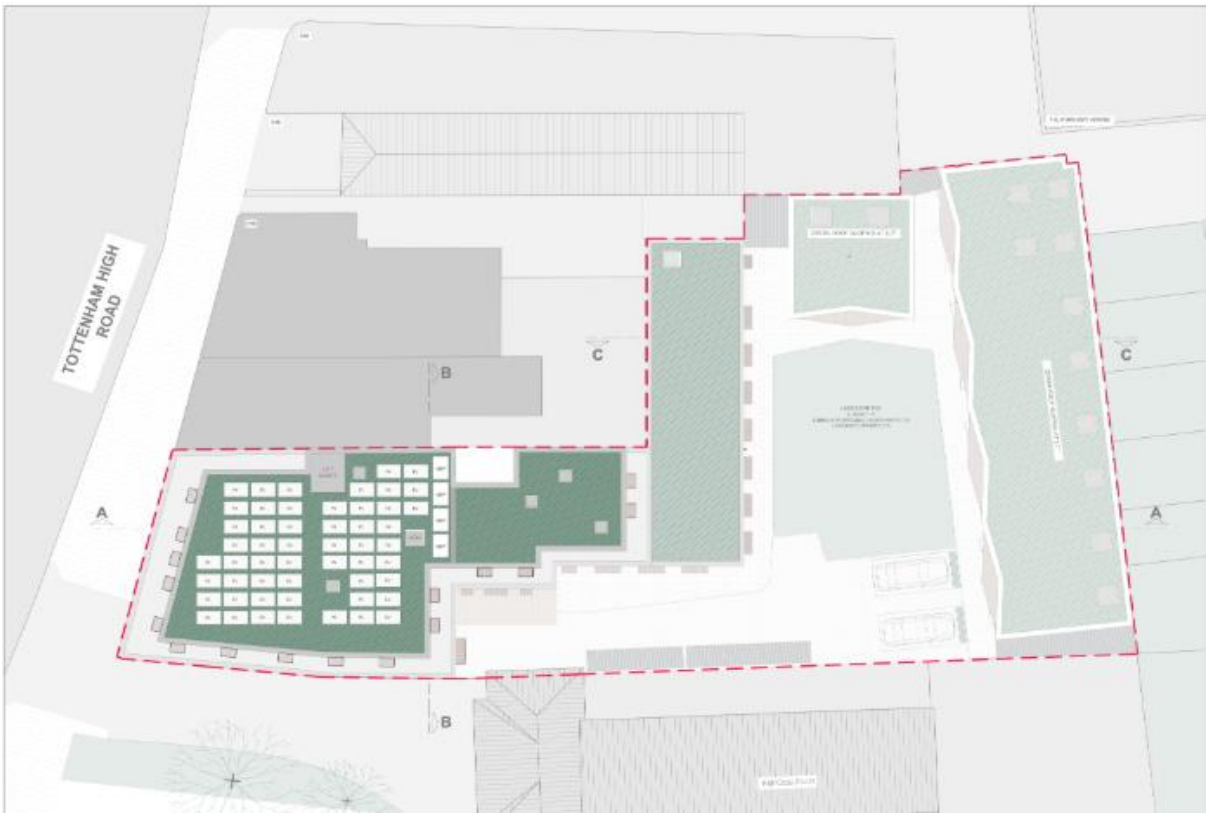
Proposed ground floor plan

Proposed first floor plan



Proposed second floor plan

Proposed third floor plan



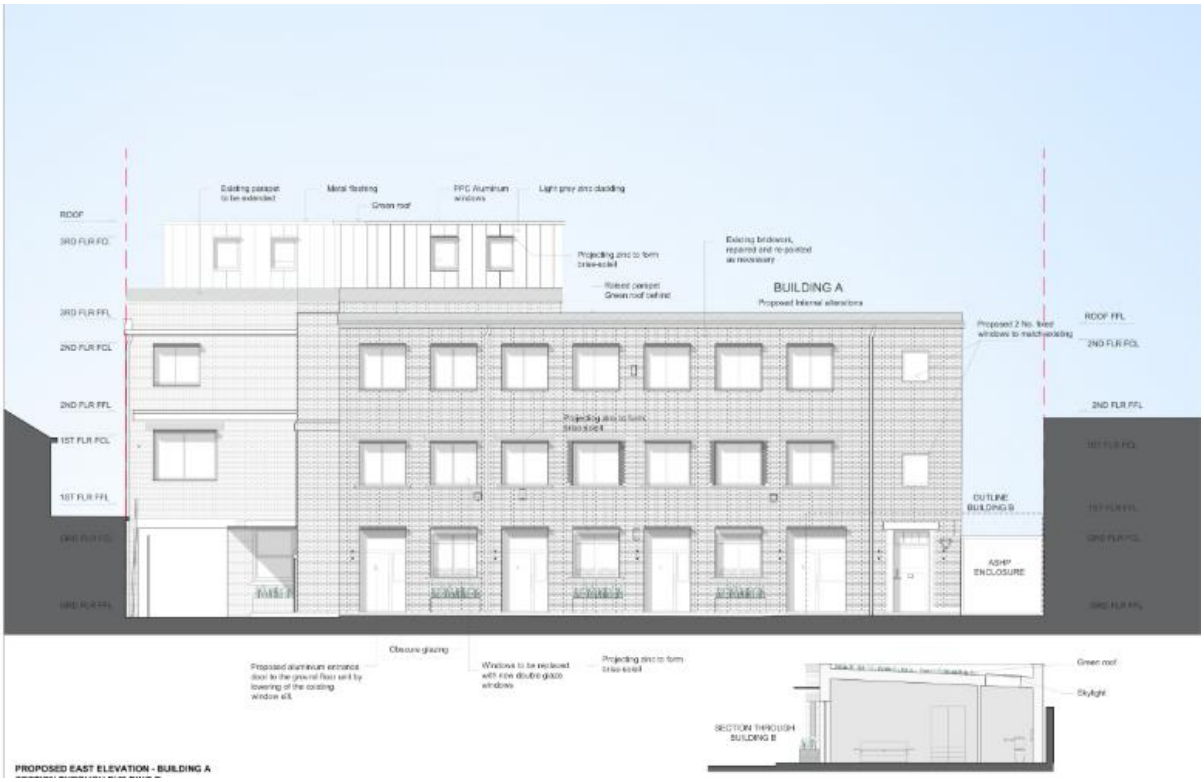
Proposed roof plan

Proposed west elevation (Front) Building A

Proposed west/south elevation (Street Scene)

Proposed south elevation – Building A

Proposed north elevation



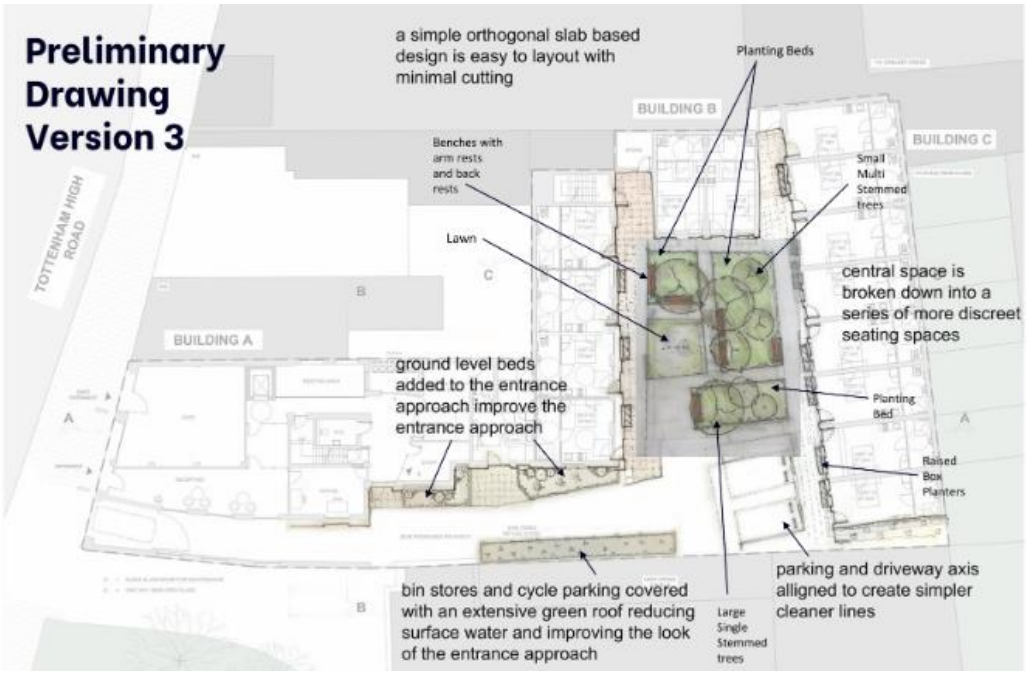
Proposed east elevation -Building A & Section through building B

Proposed section A-A

CG1 Views

CGI/ Street view

Preliminary Drawing Version 3



LANDSCAPE ARCHITECTS

Excel House Gardens

312 High St Tottenham

Preliminary Landscape Proposals CONCEPT

September 2025

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APPENDIX 3 – CONSULTATION REPONSES – INTERNAL AND EXTERNAL

Stakeholder	Question/Comment	Response
Design	HGY/2024/3386 - 312 High Road Tottenham London N15 4BN Refurbishment, conversion, and extension of the existing building, along with the construction of two new single storey buildings to the rear. Commercial use on part of the ground floor and self-contained residential uses on upper floors to provide short stay emergency accommodation. This proposal is for the refurbishment and extension of no. 312 High Road, Tottenham, to provide fifty-two bed-sitter units for emergency accommodation for the homeless, run by a private company for profit, but with the clients to be housed nominated and (it is assumed) paid for by local authorities. Site Location and Context The site is an existing property on the east side of the High Road, facing the west side of Tottenham Green, just north of the east side of The Green. Its immediate neighbour to the south is a garden in front of the High Cross United Reformed Church, the garden having been formed by the demolition of the old, Victorian gothic church following the construction of a modern (1950s?) replacement to its rear. The existing three storey building on the site is built right up to the back of pavement, like its two retail neighbours to the north, and to its side boundaries to either side, forming a party wall with no. 314 and a boundary wall, containing several (10no.) existing windows onto the church garden to the south. The building frontage features a tripartite split, with wider central windows and ground floor shopfront flanked by narrower windows or on the ground floor archways either side, to the left (north a double doorway, to the south a vehicular alleyway. This leads through to an open yard area where the building narrows, roughly in line with the frontage of the church. Further back the site widens considerably to the north, with the existing building wrapping around the corner but remaining shallow (single room) depth, with the site opening to a large, paved car park. Flatted blocks of two to three storeys to the east and north-east look onto this yard, but set behind small courtyard gardens. Tottenham Green immediately opposite and close by to the south is a historic village green now landscaped with mature trees, benches and lawns suitable for sitting out and children's play, with Tottenham High Road, cutting diagonally across the green, is a historic high street containing numerous shopping, cultural, civic and	Comments noted Conditions included The proposed conversion and extension is supporte in principle as a good use of land, for a desperately needed purpose in a location suited to this function and although the external design, composition and materials can genera be considered a goo design, especially th conversion and extension of the mai frontage building, concern was raised t the proposal should considered by the Quality Review Pane (QRP). This has sinc taken place, and the considered this development would deliver a high standa

	community facilities, as well as exceptionally dense regular bus services, which serve nearby tube and overground stations as well as the wider area. As such, the location of this application site is eminently suitable for emergency homeless people's accommodation. External Appearance The proposals are to add a set-back additional floor to the existing three storey buildings and add two single storey separate blocks in the courtyard, and introduce soft landscaping parts of the remainder of the courtyard. The existing building frontage is to be extensively remodelled, with a mid-20th century curtain walling façade to the 1st and 2nd floor frontage already confirmed as possible to be removable, revealing an older, early 20th century, vaguely Art Deco, brick and stone façade beneath. The applicants propose new timber windows in the original openings, and these changes overall will significantly improve its appearance from the street. Similar proposals will improve the ground floor, with matching render proposed for the pilasters between the shopfront window and archways. The central shopfront is proposed to serve an independent, stand-alone café-bar unit, with no connection to the homeless accommodation, which will have its main pedestrian access via the northern doorway, and servicing access, including deliveries, refuse, cycles and parking in three disabled parking places through the gated alleyway to the south. It is not clear where refuse and staff cycle storage for the café-bar unit would be, or if it is intended to share with the emergency homeless accommodation, which could create difficulties. Otherwise, provided it is viable and does not remain empty, the proposed café-bar unit is welcomed from a design point of view. The proposed rooftop extension is elegantly designed with a good set-back from the existing building edge on all sides, finished in an appropriate, light grey standing seam zinc metal cladding of visually recessive, roof-like appearance, and fenestrated with evenly spaced, elegantly vertically proportioned windows. This particular element has been improved following discussions with officer s in pre-app meetings. Stand Alone New Build Blocks Finally for consideration of the external appearance, two rows of single storey studio units are to be erected in the rear yard space, with part of the rest of the yard to be soft landscaped. A long row of 8no. units extends virtually the full length of the eastern boundary, whilst a short row of just two units closes off the northern end of the courtyard. Although in principle, this is a reasonable place to insert some new build additional units, they are not designed as a particularly convincing new build insertion, with precious urban space wasted around them by the 1m off-sets from all adjacent boundaries, their just being single storey seeming very unambitious, and the	of temporary accommodation.

	two northern-most units having obstructed views and daylight access from their proximity to the neighbouring shorter block. Overall, the impression is of an inflexible standard unit design not being adaptable to better suit location and context. Of greater concern, though, is whether the proposed units internal layout, and the complex's internal and external facilities, represent good design for the intended residents, which goes to what standards of accommodation are appropriate and what sorts of residents will be accommodated, and following on from that, what their accommodation needs are. Residential Standards As has been repeatedly stated in this and similar applications, there are no statutory or adopted policy standards for emergency accommodation for homeless people. It would appear that there is not even much published guidance, but I have been shown a very impressive research project and guidance prepared by the architects Morris+Co for Commonweal Housing, attached to this document. Titled "Family Emergency Accommodation Guidance" (hereafter referred to as "The Morris+Co Guidance"), it is aimed at defining what should be the minimum acceptable standard of emergency accommodation for families with children. In this respect, it is not clear to this officer, from the applicants' submitted information, whether children will be accommodated in this proposed development. But it is understood, and reinforced in The Morris+Co Guidance, that generally it is only parents of children who qualify for emergency accommodation on presenting as homeless. The Morris+Co Guidance further notes that the majority of homeless people who qualify for emergency housing are a single parent with one to four children. Therefore, unless children are to be specifically excluded from this institution, the accommodation will presumably have to be considered as suitable for children. The Morris+Co Guidance does not assume residents would enjoy the same standards in emergency accommodation as in permanent homes; it accepts that the purpose of emergency accommodation for homeless people is to provide a temporary, stop-gap, "roof over their heads" until permanent accommodation can be found, and recognises there is a need for this, that it is currently not possible to provide permanent accommodation to full conventional residential standards for every family containing children, who suddenly becomes homeless. It therefore assumes small units, taking up the minimum amount of space necessary, not for possessions, just assuming safe and healthy living in furnished accommodation. The biggest and most significant failure of this proposal to meet the standards in The Morris+Co Guidance is not	

	providing a separate bedroom. The Morris+Co Guidance is very clear that a separate bedroom is essential to allow staggered sleeping times and sufficient healthy sleep, especially for children, as well as space for a school child to concentrate on homework. The Morris+Co Guidance is also clear that bedrooms should have their own window. The Morris+Co Guidance also gives minimum dimensions, especially for and around beds and cots, in kitchen areas and dining areas and in bathrooms. It does not mind if kitchen and dining areas are open plan to the main living room, which can also double up as the adult's sleeping room, as befits temporary emergency accommodation. It should be noted that kitchen areas in particular are not generous by permanent accommodation standards. But it is far from clear that the single living-dining-kitchen-bedrooms in the proposed units this proposal would meet these crucial recommended sizes, especially as they are shown with just a single double bed, taking up a significant amount of the room (The Morris+Co Guidance , incidentally, recommends just single beds are provided), and no dining, sitting or playing areas are shown or appear to be available. The Morris+Co Guidance then goes on to derive minimum unit sizes, whilst noting that minima may not be achievable in all geometries. These range from 25m2 for the smallest unit, suitable for one adult and one child, to 52m2 for up to 5 people (2 adults and 3 children or 1 adult and 4 children). In these proposals, units range from 14m2 to 27m2, but only four units exceed The Morris+Co Guidance minimum of 25m2. It therefore seems clear that the proposed unit sizes are woefully inadequate for emergency accommodation for typical homeless families. The guidance goes on to recommend certain design standards for communal facilities, including a communal entrance close to a drop off / delivery bay, that is visible, subtle, safe secure and accessible, which would appear to be met, although at only 15m2, the "Waiting Area" is very small, and lacks the guide's recommended passive overlook and reception desk. There are staff offices and facilities, which can be assumed to be adequate, and two 1:1 meeting rooms, meeting recommendations, but no "Flexible Space", which the guide recommends be used for communal activities, meetings and homework clubs, nor any communal laundry facilities (and individual kitchenettes are not large enough to include washing and drying). Finally, there is an outdoor landscaped "Garden Communal Gathering Space", shown with benches on a green area indicative of it being intended to be soft landscaped, but no outdoor children's play space contrary to the guidance and wider adopted policy. The Urban Greening Factor submission shows most of this area being "Flower-rich planting herbaceous and Amenity grassland shrubs including planters", with the paths and paved areas as "Amenity grassland" which seems unrealistic if it is to be usable outside of the driest times of the year, but no more detailed landscape design is provided.	

	Summary Although the proposed conversion and extension is supported in principle as a good use of land, for a desperately needed purpose in a location suited to this function, and although the external design, composition and materials can generally be considered a good design, especially the conversion and extension of the main frontage building, the interior residential standards and space available, communal facilities and landscaping appear to be woefully inadequate and sub-standard for emergency homeless person's accommodation.	
Conservation	The property at No 312 Tottenham High Road, N15 is an early-20th century commercial building that had been cladded in the last decades with a curtain wall façade and is considered to detract from the character of the Tottenham Green Conservation Area. The development site sits on the east side of the High Road where it is surrounded by some relatively well-preserved heritage buildings such as the locally listed High Cross Church and Hall to the south of the development site, and locally listed Nos. 318 to 322 and No.324, located to the north of the development site. The immediate neighbour to the north is property at No. 316, this is a late-20th century addition, it is of note only for the blue plaque put up by the London Missionary Society in 1949 on the previous building on the site. Further to the north No. 318 is a late-19th century two-storey yellow stock brick building with a parapet and hipped slate roof set back from its neighbours. Building at No. 320, of mid-19th century appearance, has a parapet, a splayed corner, and sash windows with glazing bars, stucco surrounds, pilasters, and pediments. The inter-war shop front has granite stall risers and a recessed entrance with a black and white chequer tile floor inset with a mosaic monogram: 'AS & S Ltd'. Locally listed property at No. 324 dates from c1900 and is in red brick with buff-coloured faience blocks forming a framework of pilasters, parapet cornice and banding. The façade retains a largely intact original timber shop front and surround with Corinthian pilasters, partially hidden by modern signage and cabling. Altogether, the heritage buildings neighbouring the development site concur to illustrate the character of the earlier period of the area and complement the spacious, civic character of the Tottenham Green and Townhall approach. The proposed development is driven by the need for short-term, emergency, self-contained residential units, and the pre-application advice encouraging an assessment of the original design quality and façade conditions of the existing building has been fully embraced, and this approach has positively allowed to design for the retention, reconfiguration and extension of the existing three storey brick building, while decluttering, unveiling and reinstating the original design of its facades which is fully supported.	Comments noted

	The design proposal rests on a good understanding of the original design and character of the building, and by a discerning analysis of its built historic context including its more or less successful alterations. As part of a conservation-led, heritage-sensitive approach, the proposed zinc-cladded, single storey roof extension will be sensitively well-set back from the main street frontage and will sit behind an extended parapet that will help reducing the visible and perceived increase in height and bulk of the existing building. The additional storey will have a very modest impact on the unveiled historic character of the host building and on the setting of surrounding heritage assets, and should acceptably blend in with the varied age, design and height of the street frontage that already characterizes the eastern side stretch of the High Road comprised between Colsterworth street to the south and Monument Way to the north. The two new single storey buildings proposed to the rear of the existing building, together with some landscape design, will quietly complement the proposed design and uses of the existing building. The proposed development is very welcome within the heritage context of the Tottenham Green Conservation Area, due to its potential to declutter, unveil and reinforce the historic character of the conservation area stretch comprised between Colsterworth street and Monument Way. This scheme will cause no harm to the significance of surrounding heritage assets, and will likely enhance the quality of their setting, depending on detailed design and built quality. Accordingly, the application is fully supported from the heritage conservation perspective, however detailed design information such as specification and samples of proposed repairs, replacements and alterations to the existing elevations, and detailed design, specification material samples of the proposed roof extension and new buildings to the rear should be submitted for approval.	
Transport	Updated comments prepared 29/9/25 following scheme alterations associated with QRP This response supersedes the previous comments from late 2024 for this application, following scheme alterations resultant from QRP assessment of the application to improve the landscaping within the site. To make the required improvements, there has been a reduction and relocation of the blue badge parking, from 3 spaces to 2 spaces, and a reduction and relocation of the cycle parking, from 12 long stay and 6 short stays to 8 spaces in total. These are discussed within the response. <u>Development proposal</u>	Observation s have been taken into account. The Recommend legal agreement clauses a conditions will be included in line with t planning obligations SPD

	The applicant intends to refurb, convert, and extend the existing building, along with the construction of two new single storey buildings to the rear. The site is currently use for class F1 and it is intended to change to use class C2. The scheme retains commercial use on part of the ground floor and 52 partially self-contained residential uses in the rest of the site, providing short term emergency accommodation. The ground floor will also include a commercial restaurant and office space for support staff as well as a utility room. External amenity space is provided to the rear together with parking for 2 disabled users and 8 cycle parking spaces. <u>Location and access</u> This site is located to the eastern side of Tottenham High Road, adjacent to the High Cross Reform Church, and south of the junction of the High Road with Philip Lane. Tottenham High Road at this location is 'red route', and part of the Transport for London Road network (TLRN). TfL are therefore the Highway Authority, not Haringey at this site. The site has a PTAL value of 6B, considered 'excellent' access to public transport services, the highest value achievable with the WEBCAT assessment tool. There are 12 bus services within 2 minutes' walk of the site, and multiple services from bus stop adjacent to the site. Seven Sisters station is 7 minutes' walk away, and South Tottenham and Tottenham Hale Station 12 minutes' walk away. There are multiple shops and services accessible also within a short walk of the site. The site is also within the Seven Sisters CPZ, which operates Monday to Saturday between 0800 – 1830. <u>Existing use and proposed development.</u> At present there is a three-storey building at the site, plus a car park behind associated with it. The applicant details that there is existing commercial use at the ground floor, with office space and floor area for training. There are twelve car parking spaces that are leased out, for periods varying between one month and 12	

	months. The application form for the development does reference there are 27 car parking spaces in total. It is not clarified but it is assumed the 15 spaces not leased out are used by employees and visitors to the existing educational set up at the site. The application is for the following; • Retention of commercial at ground floor, to include a restaurant and office space for the emergency accommodation. The restaurant is referenced within the planning statement and application form but not the transport assessment. • Rear extension to the existing building and the construction of two new buildings to the rear on part of the existing car park • Provision of 52 short-term emergency self-contained residential units/flats in total across the existing/extended building and the two new buildings to the rear. • Internal cycle parking (12 spaces) and external cycle parking (6 spaces) is proposed along with 3 blue badge car parking spaces. <u>Access arrangements</u> There will be two pedestrian accesses, both will be from the High Road, and the side access to the car parking area is to be retained, to enable access for vehicles (2 blue badge parking spaces) and the externally located cycle parking. The vehicular entrance gates have been altered compared to the original submission; they have been set back to enable a car to pull off the highway prior to their operation. The proposed means of control of access and regime of opening hours will need to be provided and ultimately agreed with TfL. This must be subjected to a pre commencement condition. The applicant has also revised the arrangements for storage of the bins so that there is no obstruction to vehicular access at the gates.	

	Swept path plots will need to be provided for accessing the revised blue badge bays. <u>Trip generation</u> The Transportation assessment includes information on the likely Trip Generation resultant from the redevelopment. For the existing F1 use class TRICS predicts 17 vehicle arrivals/departures in the AM peak hour and 22 in the PM peak. For the emergency/short term 1 bed units proposed a lower vehicular trip generation of 5 vehicle arrivals/departures in the AM peak hour and 6 in the PM peak. With the blue badge only parking available it is likely to be lower than this in practice. Overall, it is expected that there will be a reduction in vehicle trips to and from the site given the change of use, loss of 27 parking spaces and essentially car free residential development. The likely number of person and vehicle trips should not create any network capacity or congestion issues. <u>Car parking considerations</u> There is an existing car park at the rear of this site, which is detailed in the application form as having a capacity for 27 cars. The Transportation Assessment references 12 spaces are leased out for periods between 1 month and 1 year. There is no commentary on the users of the remaining 15 spaces. It is assumed that these are used by visitors and employees to the current F1 use. Regarding these 12 spaces that are leased, it is unlikely that the current users of these spaces will create any additional on street issues as they will have alternatives for regular longer term parking in the form of the Council car parks in the locality, including Somerset Road Car Park (44 spaces), Tottenham Green Pool and Fitness (67 spaces), and Stoneleigh Road Car Parks A, B, & C (total of 104 spaces). As they are currently leasing spaces, they are longer term users and less likely to park opportunistically on local streets. The other 15 spaces that it is assumed are used by visitors and employees of the current site set up, their demands should disappear with the loss of the F1 facility at the site.	

	The development is proposed as car free and given the nature of the development and its location, this would be appropriate. Residential/Business Permit free status should also be implemented for which an agreement or planning obligation would be required. <u>Blue badge provision</u> Two off street spaces (which will also have electric vehicle charging facilities) are proposed. It is not clear how many fully accessible/wheelchair rooms there will be. The provision is effectively determined by the space available with the configuration of the development as proposed. The 2011 census recorded average car ownership at 0.44 vehicles per household. This is expected to have reduced since then, and given the nature of the development, it is expected car ownership will be very low. The two disabled spaces should be sufficient for the 55 units, if there are demands exceeding this provision, blue badge holders will need to park in adjacent streets within the CPZ, or the applicant will need to consider and accommodate areas within the development for secure, weatherproof scooter charging/parking to provide a facility for mobility impaired occupiers. <u>Cycle parking considerations</u> As commented earlier in this updated response, there will now be 8 cycle parking spaces provided within the development, which are to be located beneath a green roof adjacent to the bin stores. These will use Sheffield Stands which cycles can be locked to. Security will be provided both by the gated vehicular entrance and security in the reception so only authorised persons will be able to access the cycle parking. The London Plan numerical requirements for the C2 land use are for the provision of a long stay space for each 5 staff and one for every 20 bedrooms. The requirement for short stay cycle parking is for one space per 50 bedrooms. It has now been confirmed that 2 staff will work at the development. Therefore, the London Plan numerical requirements will be for 1 staff space and 3 for residents, plus 2 visitor spaces for the 52 bedrooms. Therefore, the provision of 8 spaces in total will exceed London Plan numerical requirements. Full dimensional details with layout drawings and installation specifications for the cycle parking system intended for use will be required prior to commencement of any physical works for the development, which must be covered by a pre commencement condition. All cycle parking should meet the requirements of the London	

	Cycle Design Standards as produced by TfL. It is noticed that the external cycle parking appears to be uncovered, any external visitor cycle parking will require weather protection and appropriate security. <u>Waste and recycling arrangements.</u> The bin store has been relocated within the external landscaped area of the site away from the vehicular access gates. This is an improvement on the original proposals. The applicant will need to ensure storage and collection arrangements meet the standards of Haringey's Waste team. <u>Construction Phase and arrangements</u> The submission includes a draft Construction Logistics Plan. This does provide useful information, it details an 18 month build out, references that smaller vehicles only (7.5 Tonne rigids) will be used during the build due to the restricted width and headroom at the site access, and that all loading/unloading will be carried out within the site and not on the public highway. It is also detailed that there will be on average between 1 to 4 construction related vehicles visiting the site each day, these will be slot booked and managed and will be restricted to between 0930 and 1430. The applicant should engage with TfL's Network Management officers to discuss the proposals for how the build will be accessed and serviced, including any temporary arrangements on the highway, marshalling arrangements, and how the safety of all highway users and in particular pedestrians and cyclists is safeguarded. The CLP can be updated prior to commencement to reflect the outcomes and requirements of discussions with TfL; this must be covered by a pre commencement condition. <u>Summary</u> This application proposal is for redevelopment and extension of the site at 312 High Road Tottenham to provide 52 short term emergency residential units. Since submission and scrutiny of the QRP, there have been design changes to improve the landscaping to the external areas of the site which has resulted in changes to car and cycle parking and the bin store location.	

	The 2 blue badge spaces and 8 cycle parking spaces proposed should be sufficient to meet likely demands and the cycle parking provision, whilst reduced, still exceeds London Plan numerical requirements. Overall, this development should result in a reduction in person and vehicle trips to and from the site and given the site's nature and location the car free/permit free arrangements are appropriate. Cycle parking is to be provided to meet London Plan numerical requirements, and a draft Construction Logistics Plan has been provided which indicates the main transportation aspects of the build out of the development. Subject to the following, Transportation do not object to this application. Conditions and S106 obligations 1. Delivery and Servicing Plan and Waste Management The owner shall be required to submit a Delivery and Servicing Plan (DSP) for the local authority's approval. The DSP must be in place prior to occupation of the development. The service and deliver 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 distances of a refuse truck on a waste collection day. Reason: To ensure that the development does not prejudice the free flow of traffic or public safety along the neighbouring highway. 2. Cycle Parking The applicant will be required to submit to the Highway Authority plans showing accessible; sheltered, and secure cycle parking for 8 cycles located in an accessible location for approval. REASON to be in accordance with the published London Plan 2021 Policy T5, the cycle parking must be in line with the London Cycle Design Standards (LCDS). 3. Electric Vehicle Charging	

	Subject to a condition requiring the provision of active electric vehicle charging points to serve the on-site parking spaces from onset. Reason: to be in accordance with published London Plan 2021 Policy. 5. Disabled Parking Bays The applicant will be required to submit and provide plans showing 2 no. on-site disabled persons parking bays. There should also be swept path plots provided to demonstrate ease of access for vehicles into the two blue badge bays. REASON: to ensure the development is in accordance with the published London Plan 2021 T6.5 non-residential disabled parking. 6. Access arrangements The applicant will be required to submit details regarding the operation of the proposed gates to ensure no vehicles wait inappropriately on the public highway, to avoid creating congestion and any highway safety issues. The proposed means of control of access and regime of opening hours will need to be provided and agreed with Transport for London (TfL). Reason: to maintain the free flow of traffic on the Transport for London Road Network S.106 Obligations 1. Construction Logistics and Management Plan The applicant/developer is required to submit a Construction Logistics and Management Plan, 6 months (six months) prior to the commencement of development, and approved in writing by the local planning authority. The applicant will be required to contribute, by way of a Section 106 agreement, a sum of £15,000 (fifteen thousand pounds) to cover officer time required to administer and oversee the temporary arrangements and ensure highways impacts are managed to minimise nuisance for other highways users, local residents and	

	businesses. The plan shall include the following matters, but not limited to, and the development shall be undertaken in accordance with the details as approved: a) Routing of excavation and construction vehicles, including a response to existing or known projected major building works at other sites in the vicinity and local works on the highway. b) The estimated number and type of vehicles per day/week. c) Estimates for the number and type of parking suspensions that will be required. d) Details of measures to protect pedestrians and other highway users from construction activities on the highway. e) The undertaking of a highway dilapidation survey. f) The implementation of the Construction Logistics and Community Safety (CLOCS) standard. Reason: To provide the framework for understanding and managing construction vehicle activity into and out of a proposed development in combination with other sites in the Tottenham area and to encourage modal shift and reducing overall vehicle numbers. To give the Council an overview of the expected logistics activity during the construction programme. To protect the amenity of neighbouring properties and to maintain traffic safety. 2. Car-Free Agreement The owner is required to enter into a Section 106 Agreement to ensure that the residential units are defined as “car free” and therefore no residents therein will be entitled to apply for a residents parking permit under the terms of the relevant Traffic Management Order (TMO) controlling on-street parking in the vicinity of the development. The applicant must contribute a sum of £4000 (four thousand pounds) towards the amendment of the Traffic Management Order for this purpose. Reason: To be in accordance with the published London Plan Policy T6.1 Residential Parking, and 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	

	3. Car Club Membership The applicant will be required to enter into a Section 106 Agreement to establish a car club scheme, which includes the provision of three years' free membership for all residents and £50 (fifty pounds in credit) per year/per unit for the first 3 years. Reason: To enable residential occupiers to consider sustainable transport options, as part of the measures to limit any net increase in travel movements. 4. Residential Travel Plan Within six (6) months of first occupation of the proposed new residential development a Travel Plan for the approved residential uses shall have been submitted to and approved by the Local Planning Authority detailing means of conveying information for new occupiers and techniques for advising residents of sustainable travel options. The Travel Plan shall then be implemented in accordance with a timetable of implementation, monitoring and review to be agreed in writing by the Local Planning Authority, we will require the following measures to be included as part of the travel plan in order to maximise the use of public transport: a) The developer must appoint a travel plan co-ordinator, working in collaboration with the Estate Management Team, to monitor the travel plan initiatives annually for a minimum period of 5 years. b) Provision of welcome induction packs containing public transport and cycling/walking information to every new resident, along with a £200 voucher for active travel related equipment purchases. c) The applicants are required to pay a sum of, £2,000 (two thousand pounds) for five years £10,000 (ten thousand pounds) in total for the monitoring of the travel plan initiatives. Reason: To enable residential occupiers to consider sustainable transport options, as part of the measures to limit any net increase in travel movements. 6. Highway Improvements The owner shall 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. Unavoidable works required to be undertaken by Statutory Services will not be included in the Highway Works Estimate or Payment. The developer will be required to provide details of any temporary highways scheme required to enable the occupation of each phase of the development, which will have to be costed and implemented independently. The works include but are not limited to the removal of the crossover to the site to reinstate the footway. Reason: To implement the proposed highways works to facilitate future access to the development site.	

Lead Pollution	Thank you for contacting the Carbon Management Team (Pollution) regarding the above application for the refurbishment, conversion, and extension of the existing building, along with the construction of two new single storey buildings to the rear. Commercial use on part of the ground floor and self-contained residential uses on upper floors to provide short stay emergency accommodation at 312 High Road, Tottenham, London, N15 4BN and I would to comment as it relates to matters of this service as follows. Having considered the relevant applicant submitted information including: Planning Statement dated 9 December 2024; Air Quality Assessment with reference 1016 - KP.ExcelHouse.1 prepared by Air Quality Experts Ltd., dated December 2024 taking note of sections 3 (Assessment Methodology and Significant Criteria); 4 (Baseline Conditions), 5 (Evaluation of Potential Effects); 6 (Mitigation Methods), 7 (Residual Effects and Conclusions) and Appendix A; Energy Statement prepared by T16 Design, dated 4 November 2024 taking note of the proposal to install a community ASHP along with PV Panels, please be advised that we have no objections to the proposed development in respect to air quality and land contamination but the following planning conditions and informative are recommended should planning permission be granted. 1. Land Contamination Before development commences other than for investigative work: a) A desktop study shall be carried out which shall include the identification of previous uses, potential contaminants that might be expected, given those uses, and other relevant information. Using this information, a diagrammatical representation (Conceptual Model) for the site of all potential contaminant sources, pathways and receptors shall be produced. The desktop study and Conceptual Model shall be submitted to the Local Planning Authority. If the desktop study and Conceptual Model indicate no risk of harm, development shall not commence until the desktop study has been approved in writing by the Local Planning Authority. b) If the desktop study and Conceptual Model indicate any risk of harm, a site investigation shall be designed for the site, using information obtained from the desktop study and Conceptual Model. The investigation must be comprehensive enough to enable: an updated risk assessment to be undertaken, refinement of the Conceptual Model, and the development of a Method Statement Detailing the remediation requirements. The updated risk assessment and refined Conceptual Model along with the site investigation report, shall be submitted and approved in writing by the Local Planning Authority. c) If the updated risk assessment and refined Conceptual Model indicate any risk of harm, a Method Statement detailing the remediation requirements and any post remedial monitoring, using the information obtained from the site investigation, shall be submitted to, and approved in writing by, the Local Planning Authority prior to that remediation being carried out on site. The remediation strategy shall then be implemented as approved. d) Before the development is occupied and where remediation is required, a verification report demonstrating	Comments noted. Conditions /Informative included

	that all works detailed in the remediation method statement have been completed shall be submitted to and approved in writing by the Local Planning Authority. Reason: To ensure the development can be implemented and occupied with adequate regard for environmental and public safety. 2. Unexpected Contamination If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until a remediation strategy detailing how this contamination will be dealt with has been submitted to and approved in writing by the Local Planning Authority. The remediation strategy shall be implemented as approved. Reasons: To ensure that the development is not put at unacceptable risk from, or adversely affected by, unacceptable levels water pollution from previously unidentified contamination sources at the development site in line with paragraph 109 of the National Planning Policy Framework. 3. NRMM a) Prior to the commencement of the development, evidence of site registration at http://nrmm.london/ to allow continuing details of Non-Road Mobile Machinery (NRMM) and plant of net power between 37kW and 560 kW to be uploaded during the construction phase of the development shall be submitted to and approved by the Local Planning Authority. b) Evidence that all plant and machinery to be used during the demolition and construction phases of the development shall meets Stage IV of EU Directive 97/68/ EC for both NOx and PM emissions shall be submitted to the Local Planning Authority c) During the course of the demolitions, site preparation and construction phases, an inventory and emissions records for all Non-Road Mobile Machinery (NRMM) shall be kept on site. The inventory shall demonstrate that all NRMM is regularly serviced and detail proof of emission limits for all equipment. All documentation shall be made available for inspection by Local Authority officers at all times until the completion of the development. Reason: To protect local air quality and comply with Policy 7.14 of the London Plan and the GLA NRMM LEZ 4. Management and Control of Dust While we take note that the Air Quality Assessment with reference 1016 - KP.ExcelHouse.1 prepared by Air Quality Experts Ltd. determines that the real-time PM10 continuous monitoring mitigation measure is Highly Recommended, no works shall be carried out on the site until specific locations of PM10 dust monitors and how	

	these results will be made available to the Pollution for ongoing assessment has been submitted to and approved in writing by the Local Planning Authority. The works shall be carried out in accordance with the approved details thereafter. Reasons: To Comply with Policy 7.14 of the London Plan and GLA SPG Dust and Emissions Control (2014). 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. Reason: To Comply with Policy 7.14 of the London Plan. Informative: 1. Prior to refurbishment or any construction work of the existing buildings, an asbestos survey should be carried out to identify the location and type of asbestos containing materials. Any asbestos containing materials must be removed and disposed of in accordance with the correct procedure prior to any demolition or construction works carried out.	
Carbon Team	**Carbon Management Response 11/09/2025** In preparing this consultation response, we have reviewed: • Energy Statement rev 2 prepared by T16 Design Ltd (dated July 2025) • Sustainability Statement prepared by T16 Design Ltd (dated Nov 2024) • TM59 Overheating Assessment rev 1 by T16 Design Ltd (dated July 2025) • Relevant supporting documents. Missing required information: • BREEAM Pre-Assessment Summary The development achieves a reduction of 70% carbon dioxide emissions on site, which is supported in principle. Some clarifications must be provided with regard to the Energy Strategy particularly for modelling of existing building refurbishment. A revised Overheating Strategy is also required to be submitted to address the	Comments noted. Conditions and legal agreement Clauses included

comments raised in the overheating section below. BREEAM pre-assessment report should also be provided for the commercial unit on ground floor. Appropriate planning conditions will be recommended once this information has been provided.

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 CO_2 emissions for the development shows an improvement of approximately 70% 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 14.0 tonnes of CO_2 from a baseline of 20.1 tCO_2/year.

London Plan Policy SI2 requires major development proposals to calculate and minimise unregulated carbon emissions, not covered by Building Regulations. The calculated site-wide unregulated emissions are: 13.2 tCO_2.

Site-wide (SAP10.2 emission factors)			
	Total regulated emissions (Tonnes CO_2 / year)	**CO_2 savings (Tonnes CO_2 / year)**	**Percentage savings (%)**
Part L 2021 baseline	20.1		
Be Lean	16.4	3.7	18%
Be Clean	16.4	0	0%
Be Green	6.1	10.3	51%
Cumulative savings		14.0	70%
Carbon shortfall to offset (tCO_2)	6.1		
Carbon offset contribution	£95 x 30 years x 6.1 tCO_2/year = £17,385		
10% management fee	£1,739		

Part L 2021	Residential		Commercial	
	Total regulated emissions (Tonnes CO_2 / year)	Percentage savings (%)	Total regulated emissions (Tonnes CO_2 / year)	Percentage savings (%)
Baseline	16.7		3.4	
Be Lean	13.8	17%	2.6	23%
Be Clean	13.8	0%	2.6	0%
Be Green	4.1	58%	2.0	17%
Cumulative savings		75%		40%

Actions:

- Please submit the GLA's Carbon Emission Reporting Spreadsheet.
- All proposed units in the existing building have been modelled as new build, but it should be modelled separately with the existing building modelled as the baseline.

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

EUI	Not provided	TBC Meets/Does not meet GLA benchmark of 35/65/55 kWh/m^2/year
SHD	Not provided	TBC Meets/Does not meet GLA benchmark of 15 kWh/m^2/year
Methodology used	-	

Actions:

- What is the calculated Energy Use Intensity (excluding renewable energy)? How does this perform against GLA benchmarks, i.e. at 35 (resi) kWh/m2/year? Please submit the information in line with the GLA's reporting template.
- What is the calculated space heating demand? How does this perform against the GLA benchmark of 15 kWh/m2/year? Please submit the information in line with the GLA's reporting template.

Energy – Lean

The applicant has proposed a saving of 3.7 tCO_2 in carbon emissions (18%) through improved energy efficiency standards in key elements of the build. The residential part of the development has achieved 17% reduction while the commercial has achieved 23% reduction, both reductions go beyond the minimum 10% and 15% reduction respectively set in London Plan Policy SI2, so this is supported.

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

Floor u-value	0.11 W/m^{2}K (new); 0.20 W/m^{2}K (refurbished)
External wall u-value	0.15 W/m^{2}K (new); 0.22 W/m^{2}K (refurbished)
Roof u-value	0.12 W/m^{2}K (new); 0.12 W/m^{2}K (refurbished)
Door u-value	2.20 W/m^{2}K (refurbished, personnel doors)
Window u-value (glazing)	1.20 W/m^{2}K (all)
G-value	Not provided.
Air permeability rate	3 m^3/hm^2 @ 50Pa (new); 8 m^3/hm^2 @ 50Pa (refurbished)
Ventilation strategy	Mechanical ventilation with heat recovery to all studios
Waste Water Heat recovery	Not provided.

Thermal bridging	Not provided.
Low energy lighting	Not provided.
Heating system (efficiency / emitter)	Residential: Gas boiler with an efficiency of 89.5% (Be lean) Non-residential: ASHP
Thermal mass	Not provided.
Improvement from the target fabric energy efficiency (TFEE)	Average value to be provided.

Actions:

- 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.

Refurbishments

- Applicant to provide the proposed retrofit strategy. For example what have been proposed to upgrade the existing building fabric to achieve the proposed U-values of the refurbishment of the existing building.
- The thermal performance of the proposed U-value of the external wall is not very high; applicant should explore the possibility to improve further.

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 site is not within reasonable distance of an existing Decentralised Energy Network (DEN). A Combined Heat and Power (CHP) plant would not be appropriate for this site.

	The site is within 500 meters of a planned future DEN, however it has been acknowledged that the size of the development is too small to warrant a connection to DEN financially. Energy – Green As part of the Be Green carbon reductions, all new developments must achieve a minimum reduction of 20% from on-site renewable energy generation to comply with Policy SP4. The application has reviewed the installation of various renewable technologies. The report concludes that air source heat pumps (ASHPs) and solar photovoltaic (PV) panels are the most viable options to deliver the Be Green requirement. A total of 10.3 tCO_2 (51%) reduction of emissions are proposed under Be Green measures. The solar array peak output would be 26 kWp. An array of 52 panels has been proposed on the roof of Building A. The communal ASHP systems (efficiency of 450%) will provide hot water and heating to the dwellings. <u>Actions:</u> - Applicant should consider to optimise the roof spaces available for PV installation. For example, biosolar roof system combining solar and green roofs can be considered for the two smaller buildings. - What is the amount of electricity generated by the solar panels of 26 kWp peak output and the equivalent carbon reduction? - How will the solar energy be used on site (before surplus is exported onto the grid)? - 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. - What is the Seasonal Coefficient of Performance (SCOP), the Seasonal Performance Factor (SFP) and Seasonal Energy Efficiency ratio (SEER) of the ASHP? Energy – Be Seen London Plan Policy SI2 requests all developments to ‘be seen’, to monitor, verify and report on energy performance. The GLA requires all major development proposals to report on their modelled and measured operational energy performance. This will improve transparency on energy usage on sites, reduce the	

performance gap between modelled and measured energy use, and provide the applicant, building managers and occupants clarity on the performance of the building, equipment and renewable energy technologies.

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

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

Carbon Offset Contribution

A carbon shortfall of 6.1 tCO_2/year remains. The remaining carbon emissions will need to be offset at £95/tCO_2 over 30 years.

Overheating

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

In accordance with the Energy Assessment Guidance, the applicant has undertaken a dynamic thermal modelling assessment in line with CIBSE TM59 with TM49 weather files. The report has modelled 21 representative studios.

The OH assessment has modelled only the as-designed scenario under predominantly naturally ventilated. The modelling has incorporated security constraint, but it is unclear if there is any acoustic constraint.

Results are listed in the table below.

	Predominantly naturally ventilated

Domestic: CIBSE TM59	Criterion A (<3% hours)	Criterion B for bedrooms (less than 33 hours)	Pass TM59 Criteria
DSY1 2020s	All pass	All pass	Yes
DSY2 2020s	All pass	Not provided.	Not provided.
DSY3 2020s	All pass	Not provided.	Not provided.

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

- Openable windows but with some openable windows restricted
- Glazing g-value of 0.53
- Proposed external shading (proposal unclear)
- MVHR with cooling bolt on

The submitted overheating strategy is not acceptable; a revised strategy is required to address the comments in the actions section.

Actions:

- Applicant to confirm if the modelling has been prepared using
    - Central London weather file, which will more accurately represent the urban heat island effect.
    - Type 1 occupancy (see CIBSE TM52) as the development includes vulnerable residents.
- Please confirm if the sampling units have covered the following requirements.
    - All single-aspect rooms facing west, east, and south;
    - At least 50% of rooms on the top floor;
    - 75% of all modelled rooms facing South or South/West;
    - Habitable communal spaces (e.g. communal living/dining rooms in care homes);
    - Communal corridors, where pipework runs through;
    - Any commercial/office areas, particularly where they will be occupied for a longer period of time. Assuming that active cooling will be provided is not sufficient. If the proposed uses are not yet clear, this aspect can be conditioned to ensure that the modelling is based on the potential future occupiers.;
- Applicant should demonstrate how the Cooling Hierarchy has been followed, the risk of overheating has been reduced as far as practical by prioritising all passive measures, such as reduced glazing and increased external shading, before the incorporation of active cooling.

- The proposed shading strategy is unclear. The proposed elevations have indicated the provision of brise-soleils; however, it is unclear if they have been modelled in the OH assessment. Please identify the dwellings units provided with external shading and provide the specifications.
- Please note 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).
- Applicant to clarify what site constraints have been modelled:
    - Point 2.3 in OH assessment has mentioned there is noise constraint. Please clarify.
    - Security constraints have been identified for the accessible windows. Please confirm if those windows have been modelled shut or with less than 100mm wide openable area.
    - Some accessible windows on ground floor are being modelled as unrestricted. Please clarify.

- Applicant should model different scenarios starting from baseline, then incorporating passive measures, before moving onto the final proposal with MVHR with cooling coils.
- If there are limitations on openable windows, applicants are required to submit two separate overheating analyses: one with openable windows and one with closed windows.
- Please confirm if MVHR with cooling coils will be provided to all dwelling units and please provide details. Applicant should prioritize passive measures to minimise the energy consumption associated with the use of MVHR with cooling coils.

	- 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. - Identify communal spaces (indoor and outdoor) where residents can cool down if their flats are overheating. - Confirm who will own the overheating risk when the building is occupied (not the residents). This development should have a heatwave plan / building user guide to mitigate overheating risk for occupants. Sustainability Non-Domestic BREEAM Requirement Policy SP4 requires all new non-residential developments to achieve a BREEAM rating 'Very Good' (or equivalent), although developments should aim to achieve 'Excellent' where achievable. <u>Actions:</u> - Submit the BREEAM Pre-Assessment report. - A table should be submitted to demonstrate which credits will be met, how many are met out of the total available, under which category, which could be achieved, and which will not be met. This needs to include justification where targets are not met or 'potential' credits (where they are available under the Shell and Core assessment). This will enable better assessment of which credits. Urban Greening / Biodiversity All development sites must incorporate urban greening within their fundamental design and submit an Urban Greening Factor Statement, in line with London Plan Policy G5. London Plan Policy G6 and Local Plan Policy DM21 require proposals to manage impacts on biodiversity and aim to secure a biodiversity net gain. Additional greening should be provided through high-quality, durable measures that contribute to London's biodiversity and mitigate the urban heat island impact. This should include tree planting, shrubs, hedges, living roofs, and urban food growing. Specifically, living roofs and walls are encouraged in the London Plan. Amongst other benefits, these will increase biodiversity and reduce surface water runoff. The applicant has stated the site is exempted from the BNG requirement as it impacts less than $25m^2$ of on-site habitat. But a new communal garden has been proposed. The Urban Greening Factor calculation has demonstrated the proposal has achieved a score of 0.406. This is supported.	

	Living roofs All development sites must incorporate urban greening within their fundamental design, in line with London Plan Policy G5. The development is proposing living roofs in the development. All landscaping proposals and living roofs should stimulate a variety of planting species. Mat-based, sedum systems are discouraged as they retain less rainfall and deliver limited biodiversity advantages. The growing medium for extensive roofs must be 120-150mm deep, and at least 250mm deep for intensive roofs (these are often roof-level amenity spaces) to ensure most plant species can establish and thrive and can withstand periods of drought. Living walls should be rooted in the ground with sufficient substrate depth. Living roofs are supported in principle, subject to detailed design. Details for living roofs will need to be submitted as part of a planning condition. ***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. No reference has been made to reducing whole-life carbon within the proposed development. The applicant is strongly encouraged to consider using low-carbon materials, sourced as local as possible. ***Circular Economy*** Policy SI7 requires applications referable to the Mayor of London to submit a Circular Economy Statement demonstrating how it promotes a circular economy within the design and aim to be net zero waste. Haringey Policy SP6 requires developments to seek to minimise waste creation and increase recycling rates, address waste as a resource and requires major applications to submit Site Waste Management Plans. This application is not required to submit a full statement. No reference has been made to consider and integrate circular economy principles within the proposed development. The applicant is strongly encouraged to consider implementing circular economy principles, such as designing for disassembly and reuse. Planning Obligations Heads of Terms	

- 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 tCO_2 at the Energy Plan and Sustainability stages.

Planning Conditions

To be secured (with detailed wording TBC)

- Energy strategy
- Overheating
- BREEAM Certificate
- Living roofs

Carbon Management Response 11/09/2025

In preparing this consultation response, we have reviewed:

- Energy Statement rev 2 prepared by T16 Design Ltd (dated July 2025)
- TM59 Overheating Assessment rev 4 by T16 Design Ltd (dated Sept 2025)
- GLA Carbon emissions reporting spreadsheet – Refurbishment
- GLA Carbon emissions reporting spreadsheet – New build
- Correspondence with applicants

1. Summary

The overall site-wide carbon reduction has not changed from the previous revision, it achieves a reduction of 70%, which is supported in principle. This response details the clarifications and changes. Planning conditions have been recommended to secure the benefits of the scheme.

2. Energy Strategy

The overall predicted reduction in CO_2 emissions for the development across all stages have not changed. However, applicant has confirmed the refurbishment and the new build of the residential have been modelled separately in accordance with GLA energy assessment guidance. The carbon reductions of the two have been summarized in the table below:

Part L 2021 Residential	**Refurbishment**		**New build**	
	Total regulated emissions (Tonnes CO_2 / year)	**Percentage savings (%)**	**Total regulated emissions (Tonnes CO_2 / year)**	**Percentage savings (%)**
Baseline	6.6		10.1	
Be Lean	5.4	17%	8.4	17%
Be Clean	5.4	0%	8.4	0%
Be Green	2.8	41%	1.3	70%
Cumulative savings		58%		87%

Energy – Lean

The applicant has clarified their proposed retrofit strategy. The existing building envelope including roofs, walls and floors will be refurbished to meet the building regulation requirements. For example, the internal face of the external face of the wall can be dry lined to achieve the required U-value.

Actions:

- Applicant should consider a whole house retrofit strategy. Special attention should be focused on vapour movement of the proposed refurbishment envelope build-ups to avoid interstitial condensation; applicant should prioritise using breathable materials.

2. Overheating

The applicant has confirmed the OH modelling has been prepared using Central London weather file and assessed under Type 1 occupancy.

The sampling has covered 50% of top floor, communal spaces and corridors. A total 21 representative units have been modelled. Due to nature of this development with mostly single-aspect small dwelling units, while not all single-aspect rooms facing west, east, and south have been modelled, the sampled units have covered nearly all different conditions. However, no units on second floor have been sampled, this will be conditioned.

The OH report has assessed the following scenarios:
1) Baseline without shading
2) Scenario 1 with external shading
3) Scenario 2 with MVHR cooling bolt-on

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

- Openable windows but with some openable windows restricted
- Glazing g-value of 0.53
- Proposed external shading – brise soleil with 550mm projection to windows on East side of South elevation, all elevations on third floor and East elevation
- MVHRs with cooling bolt on to all units

Applicant has confirmed they have maximised the provision of external shading to the development. There are no external shadings allowed to the original ornate west elevation of the main building for conservation reason and also the west end of the south elevation for boundary reason.

	Predominantly naturally ventilated

Domestic: CIBSE TM59 DSY 1 2020s	Criterion A (<3% hours)	Criterion B for bedrooms (less than 33 hours)	Pass TM59 Criteria
1 – Baseline	13/21 pass	1/21 pass	1/21 pass
2 – External shading	16/21 pass	1/21 pass	1/21 pass
3 – MVHR cooling bolt-on	21/21 pass	21/21 pass	21/21 pass

Non-domestic: CIBSE TM52	Number of habitable spaces that pass at least 2 out of 3 criteria 1: hours of exceedance 2: daily weighted exceedance 3: upper limit temperature
DSY1 2020s	All pass

3. Planning Obligations Heads of Terms

- 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 tCO_2 at the Energy Plan and Sustainability stages.

4. Planning Conditions

The following conditions are recommended to secure the benefits of the scheme.

Energy Strategy

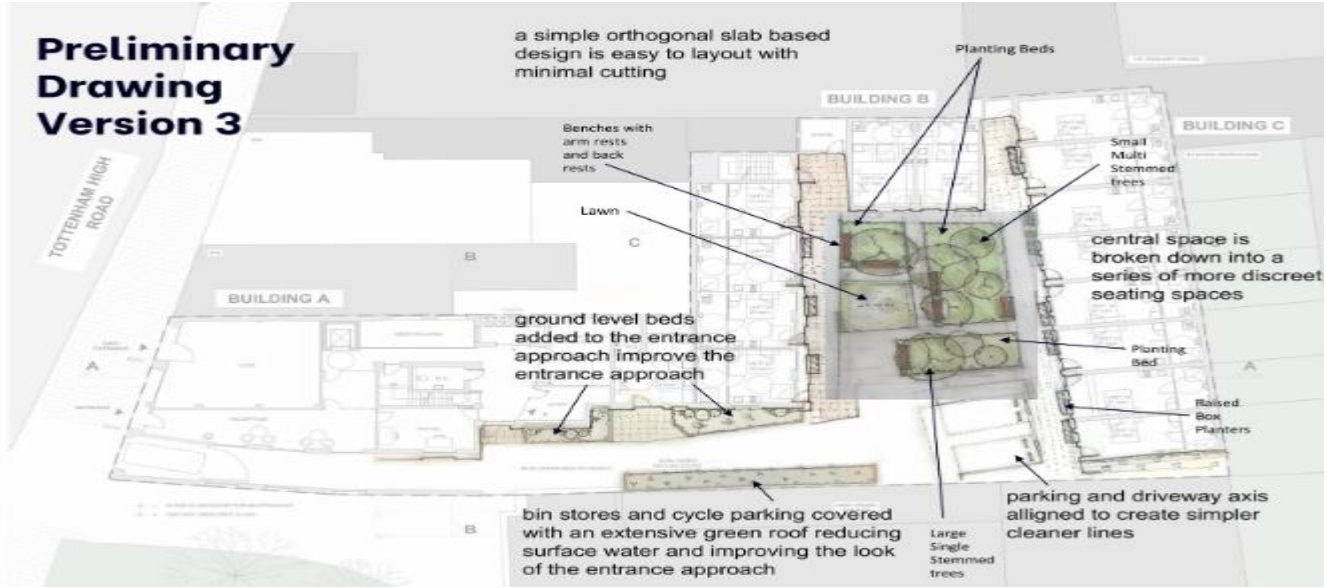
The development hereby approved shall be constructed in accordance with the Energy Statement rev 2 prepared by T16 Design Ltd (dated July 2025) delivering a minimum 70% improvement on carbon emissions over 2021 Building Regulations Part L, with high fabric efficiencies, communal air source heat pumps (ASHPs) and a minimum 26 kWp solar photovoltaic (PV) array.

	(a) Prior to above ground construction, details of the Energy Strategy shall be submitted to and approved by the Local Planning Authority. This must include: - *Confirmation of how this development will meet the zero-carbon policy requirement in line with the Energy Hierarchy;* - *Confirmation of the necessary fabric efficiencies to achieve a minimum 18% 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) and annual energy generation (kWh/year); inverter capacity; and how the energy will be used on-site before exporting to the grid;* - *Specification of any additional equipment installed to reduce carbon emissions, if relevant;* - *A metering strategy.* *The development shall be carried out strictly in accordance with the details so approved prior to first operation and shall be maintained and retained for the lifetime of the development.* *(b) The solar PV arrays/ air source heat pump(s) must be installed and brought into use prior to first occupation of the relevant block. Six months following the first occupation of that block, evidence that the solar PV arrays have been installed correctly and are operational shall be submitted to and approved by the Local Planning Authority, including photographs of the solar array, installer confirmation, an energy generation statement for the period that the solar PV array has been installed, and a Microgeneration Certification Scheme certificate. The solar PV array shall be installed with monitoring equipment prior to completion and shall be maintained at least annually thereafter.* *(c) Within six months of first occupation, evidence shall be submitted to the Local Planning Authority that the development has been registered on the GLA's Be Seen energy monitoring platform.* *Reason: To ensure the development reduces its impact on climate change by reducing carbon emissions on site*	

	in compliance with the Energy Hierarchy, and in line with London Plan (2021) Policy SI2, and Local Plan (2017) Policies SP4 and DM22. *<u>Overheating</u>* *(a) Prior to the above ground commencement of the development, an updated Overheating Report shall be submitted to and approved by the Local Planning Authority. The submission shall assess the overheating risk, confirm the mitigation measures, and propose a retrofit plan. This assessment shall be based on the TM59 Overheating Assessment rev 4 by T16 Design Ltd (dated Sept 2025) as a starting point, taking into account the outstanding requirements at application stage.* *This report shall include:* - *Further modelling of units to include all dwelling units based on CIBSE TM52/59, using the CIBSE TM49 London Weather Centre files for the DSY1-3 (2020s) and DSY1 2050s and 2080s, high emissions, 50% percentile with openable and closed window scenarios;* - *Demonstrating the mandatory pass for DSY1 2020s can be achieved following the Cooling Hierarchy and in compliance with Building Regulations Part O, demonstrating that any risk of crime, noise and air quality issues are mitigated appropriately evidenced by the proposed location and specification of measures by following the Cooling Hierarchy;* - *Modelling of mitigation measures required to pass current and future weather files, clearly setting out which measures will be delivered before occupation and which measures will form part of the retrofit plan;* - *Details and specifications of the brise-soleils; the number and location of brise-soleils should match that on the proposed elevations as a minimum;* - *To provide retrofit measures and confirm that they 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.* *(b) Prior to occupation, the development must be built in accordance with the approved overheating measures and retained thereafter for the lifetime of the development:* - *Openable windows but with some openable windows restricted* - *Glazing g-value of 0.53* - *Proposed external shading – brise soleil with 550mm projection to windows on East side of South elevation, all elevations on third floor and East elevation*	

	- *MVHRs with cooling bolt on to all units* - *Any further mitigation measures as approved by or superseded by the latest approved Overheating Strategy.* *REASON: In the interest of reducing the impacts of climate change, to enable the Local Planning Authority to assess overheating risk and to ensure that any necessary mitigation measures are implemented prior to construction, and maintained, in accordance with London Plan (2021) Policy SI4 and Local Plan (2017) Policies SP4 and DM21.* *<u>BREEAM</u>* *a) Prior to the commencement of development, a sustainability assessment should be submitted to the planning authority which achieves the highest possible standard have been achieved through measurable outputs to demonstrate how environmental sustainability has been integrated into the development. This may be achieved through a BREEAM Pre-Assessment with a minimum 'Very Good' rating, or similar independently audited assessment where measurable outputs can be demonstrated. This should include a table to demonstrate which credits will be met, how many are met out of the total available, under which category, which could be achieved, and justification for which credits will not be met.* *Reasons: In the interest of addressing climate change and securing sustainable development in accordance with London Plan (2021) Policies SI2, SI3 and SI4, and Local Plan (2017) Policies SP4 and DM21.* *<u>Living roofs</u>* *(a) Prior to the above ground commencement of development, details of the living roofs must be submitted to and approved in writing by the Local Planning Authority. Living roofs must be planted with flowering species that provide amenity and biodiversity value at different times of year. Plants must be grown and sourced from the UK and all soils and compost used must be peat-free, to reduce the impact on climate change. The submission shall include:* *i) A roof plan identifying where the living roofs will be located;* *ii) A section demonstrating settled substrate levels of no less than 120mm for extensive living roofs (varying depths of 120-180mm), and no less than 250mm for intensive living roofs;* *iii) Roof plans annotating details of the substrate: showing at least two substrate types across the roofs, annotating contours of the varying depths of substrate* *iv) Details of the proposed type of invertebrate habitat structures with a minimum of one feature per 30m^2 of living roof: substrate mounds and 0.5m high sandy piles in areas with the greatest structural support to*	

	provide a variation in habitat; semi-buried log piles / flat stones for invertebrates with a minimum footprint of 1m^2, rope coils, pebble mounds of water trays; *v) Details on the range and seed spread of native species of (wild)flowers and herbs (minimum 10g/m^2) and density of plug plants planted (minimum 20/m^2 with root ball of plugs 25cm^3) to benefit native wildlife, suitable for the amount of direct sunshine/shading of the different living roof spaces. The living roofs will not rely on one species of plant life such as Sedum (which are not native);* *vi) Roof plans and sections showing the relationship between the living roof areas and photovoltaic array; and* *vii) Management and maintenance plan, including frequency of watering arrangements.* *(b) Prior to the occupation of the development, evidence must be submitted to and approved by the Local Planning Authority that the living roofs have been delivered in line with the details set out in point (a). This evidence shall include photographs demonstrating the measured depth of substrate, planting and biodiversity measures. If the Local Planning Authority finds that the living roofs have not been delivered to the approved standards, the applicant shall rectify this to ensure it complies with the condition. The living roofs shall be retained thereafter for the lifetime of the development in accordance with the approved management arrangements.* *Reason: To ensure that the development provides the maximum provision towards the creation of habitats for biodiversity and supports the water retention on site during rainfall. In accordance with London Plan (2021) Policies G1, G5, G6, SI1 and SI2 and Local Plan (2017) Policies SP4, SP5, SP11 and SP13.*	
Community Safety	**Comments dated 30/09/2025** The location is in area with high crime volume and in close proximity to an area identified by the Home Office as being in the top areas in the UK for knife crime and serious violence. This was identified as part of a Home Office Project (the accelerator project) that is ongoing that has pulled in resources from the Home Office and Acedemia to problem solve and understand the issue better and possible solutions. Observations I would have relate to the • Identification of and risk assessment of those who may be placed into the accommodation • The cohorts of individuals likely to be placed, is there any further detail • What mitigation will be in place, could be put in place to support occupants	Comments noted The observation mad has been addressed report and as such Conditions and legal agreement Clauses included.

	I think it important that we try and understand this further, as we would not wish to create a crime generator in the locality that may be associated with such a project.	
Trees/landscaping	Comments dated 24/09/2025 From an arboricultural point of view, I hold no initial concerns. The design looks fine. Do we have a species list, and an aftercare programme.  Officers comment dated 01/07/2025 They will need to confirm that species list and aftercare programme. This is secured by condition.	Comments noted Condition included
Waste Management	Comments dated 01/10/2025	Comments noted

	Looking back at the responses from the applicant he does mention there will be recycling, and food waste include in the waste streams, therefore I don't suggest a condition is required here, and this application has my full approval.	The Delivery and Servicing Plan condi will address waste collection concerns
Housing Support Team	Has confirmed that there is an identified need for this type of accommodation and as such has provided their support.	Comments noted
Planning Policy	In accordance with Local Plan Policy DM15: Specialist Housing and London Plan Policy H12 Supported and specialised accommodation, there needs to be an identified/ established local need for the form of housing sought, having regard to the aims and recommendations of Haringey's Housing Strategy and Older People Strategy. The accommodation will need to be at a standard suitable for the intended occupiers. The Housing Strategy (2024-2029) confirms there is a strong need for suitable temporary accommodation. A robust assessment demonstrating how the proposal meets local needs and standards for temporary accommodation will be required, which should be informed by the recently adopted Housing Strategy, the Temporary Accommodation Placements Policy, which is in the process of being updated, and discussions with the Housing Strategy and Adult Social Care teams. This assessment should include the affordability of the proposed accommodation. The type of needs anticipated to be met through the proposed accommodation and how this responds to local needs i.e. is it for families, people with particular healthcare needs would be required. The assessment should also demonstrate how the proposal is suitable for people with those needs and meets the relevant standards. The Housing Strategy refers to the 'Setting the Standard' document, further criteria are outlined in the Temporary Accommodation Placements Policy and the applicants have been provided with the Family Emergency Accommodation Guidance.	Comments noted
EXTERNAL		

Historic England	Historic England Mr Kwaku Bossman-Gyamera Planning Regeneration & Economy Level 6 River Park House Wood Green N22 8HQ Your Ref: HGY/2024/3386 Our Ref: 228526 Contact: Valeria Powell 07443 316 448 Valeria.Powell@historicengland.org.uk 21 January 2025 Dear Mr Bossman-Gyamera, TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED) NATIONAL PLANNING POLICY FRAMEWORK 2024 312 High Road, Tottenham, London, N15 4BN *Refurbishment, conversion, and extension of the existing building, along with the construction of two new single storey buildings to the rear. Commercial use on part of the ground floor and self-contained residential uses on upper floors to provide short stay emergency accommodation.* Recommend Archaeological Condition Thank you for your consultation received on 24 December 2024. The Greater London Archaeological Advisory Service (GLAAS) gives advice on archaeology and planning. Our advice follows the National Planning Policy Framework (NPPF) and the GLAAS Charter. Assessment of Significance and Impact The planning application lies in an area of archaeological interest (Archaeological Priority Area) identified in the Local Plan: [77574] Tottenham Medieval Settlement.	Comments noted conditions and Informatives included

	The APA has the potential to contain archaeological remains dating from the prehistoric period through to the post-medieval period. It is situated on the alignment of the Roman road known as Ermine Street as it passes through Tottenham. The alignment of the Roman road is approximately marked by the modern High Road (A10) and Tottenham High Road (A1010). The road was created in the Roman period to connect Roman city of Londinium (London) to the main centres of the military occupation at Lincoln (Lindum Colonia) and York (Eboracum). Archaeological work carried out within the western part of the APA has found evidence of prehistoric activity dating to the late Bronze Age and early Iron Age, highlighting the potential for further prehistoric remains in this area, and recent excavations to the north of the site have found evidence of Mesolithic activity and there is the potential for similar finds at this site. The development proposals therefore have the potential to negatively impact any surviving archaeological resource. Planning Policies NPPF Section 16 and the London Plan (2021 Policy HC1) recognise the positive contribution of heritage assets of all kinds and make the conservation of archaeological interest a material planning consideration. NPPF paragraph 207 says applicants should provide an archaeological assessment if their development could affect a heritage asset of archaeological interest. NPPF paragraphs 202 and 210 and London Plan Policy HC1 emphasise the positive contributions heritage assets can make to sustainable communities and places. Where appropriate, applicants should therefore also expect to identify enhancement opportunities. If you grant planning consent, paragraph 218 of the NPPF says that applicants should record the significance of any heritage assets that the development harms. Applicants should also improve knowledge of assets and make this public. Recommendations I advise that the development could cause harm to archaeological remains and field evaluation is needed to determine appropriate mitigation. However, although the NPPF envisages evaluation being undertaken prior to determination, in this case consideration of the nature of the development, the archaeological interest and/or practical constraints are such that I consider a two-stage archaeological condition could provide an acceptable safeguard. This would comprise firstly, evaluation to clarify the nature and extent of surviving remains, followed, if necessary, by a full investigation. I therefore recommend attaching a condition as follows:		

Condition No demolition or development shall take place until a stage 1 written scheme of investigation (WSI) has been submitted to and approved by the local planning authority in writing. For land that is included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI, and the programme and methodology of site evaluation and the nomination of a competent person(s) or organisation to undertake the agreed works.
If heritage assets of archaeological interest are identified by stage 1 then for those parts of the site which have archaeological interest a stage 2 WSI shall be submitted to and approved by the local planning authority in writing. For land that is included within the stage 2 WSI, no demolition/development shall take place other than in accordance with the agreed stage 2 WSI which shall include:

A. The statement of significance and research objectives, the programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works
B. Where appropriate, details of a programme for delivering related positive public benefits
C. The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material. This part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the stage 2 WSI.

Informative Written schemes of investigation will need to be prepared and implemented by a suitably professionally accredited archaeological practice in accordance with Historic England's Guidelines for Archaeological Projects in Greater London. This condition is exempt from deemed discharge under schedule 6 of The Town and Country Planning (Development Management Procedure) (England) Order 2015.

This pre-commencement condition is necessary to safeguard the archaeological interest on this site. Approval of the WSI before works begin on site provides clarity on what investigations are required, and their timing in relation to the development programme. If the applicant does not agree to this pre-commencement condition, please let us know their reasons and any alternatives suggested. Without this pre-commencement condition being imposed the application should be refused as it would not comply with NPPF paragraph 211.

I envisage that the archaeological fieldwork would comprise the following:

	Evaluation An archaeological field evaluation involves exploratory fieldwork to determine if significant remains are present on a site and if so to define their character, extent, quality and preservation. Field evaluation may involve one or more techniques depending on the nature of the site and its archaeological potential. It will normally include excavation of trial trenches. A field evaluation report will usually be used to inform a planning decision (pre-determination evaluation) but can also be required by condition to refine a mitigation strategy after permission has been granted. You can find more information on archaeology and planning in Greater London on our website. This response relates solely to archaeological considerations. If necessary, Historic England's Development Advice Team should be consulted separately regarding statutory matters. Yours sincerely Valeria Powell Assistant Archaeology Adviser Greater London Archaeological Advisory Service London and South East Region	

APPENDIX 4 QRP REPORT

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FRAME PROJECTS

London Borough of Haringey Quality Review Panel

Report of Intermediate Review Meeting: 312 High Road

Wednesday 2 July 2025
Level 6 Collaboration Space, Alexandra House, 10 Station Road, London N22 7TY

Panel

Esther Everett (chair)
Dieter Kleiner
Miranda MacLaren

Attendees

Kwaku Bossman-Gyamera	London Borough of Haringey
Saloni Parekh	London Borough of Haringey
Tania Skelli	London Borough of Haringey
Catherine Smyth	London Borough of Haringey
Elisabetta Tonazzi	London Borough of Haringey
Richard Truscott	London Borough of Haringey
Alice Tsoi	London Borough of Haringey
Kirsty McMullan	Frame Projects
Bonnie Russell	Frame Projects

Apologies / report copied to

Suzanne Kimman	London Borough of Haringey
Rob Krzyszowski	London Borough of Haringey
John McRory	London Borough of Haringey
Ruth Mitchell	London Borough of Haringey
Biplav Pagéni	London Borough of Haringey
Gareth Prosser	London Borough of Haringey
Roland Sheldon	London Borough of Haringey
Ashley Sin-Yung	London Borough of Haringey
Kevin Tohill	London Borough of Haringey
Bryce Tudball	London Borough of Haringey

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1. Project name and site address

Excel House, 312 High Road, London N15 4BN

2. Presenting team

Milan Babic	Milan Babic Architects
Jerry Bell	CQPlanning

3. Planning authority briefing

The site is opposite Tottenham Green on the eastern side of High Road. It is located within the Tottenham High Road Historic Corridor/Tottenham Green Conservation Area, but it is not a listed building.

This site accommodates a three-storey building, known as Excel House, with a commercial use at ground floor. There have been substantial alterations to the front façade, as well as a single storey extension to the rear. The building is partially vacant and is currently occupied by short term tenants. It was previously used as a college training facility and events venue.

The proposal is for the refurbishment, conversion and extension of the existing building, alongside the construction of two new single storey buildings to the rear, to provide short-stay emergency accommodation. There will be 52 dwellings in total: ten in the single storey new buildings, and 42 in the refurbished existing building. The dwellings are intended to be single occupancy, for stays of between one night and a few months. The ground floor accommodates a public café, alongside office space for support staff, a utility room and ancillary spaces. External amenity space is provided to the rear.

Haringey's Housing Strategy Team has confirmed that there is an identified need for this type of accommodation. The provider has suggested that Haringey would have first refusal rights on referrals into the facility, but acknowledged that there may be scenarios where they would accept referrals from other local authorities. Haringey would have a nomination rights agreement.

Officers asked for the panel's comments on the quality of accommodation and amenity space, and whether this meets the needs of the user group; impact on the townscape and heritage setting; and sustainability, including internal thermal comfort for residents.

4. Quality Review Panel's views

Summary

The Haringey Quality Review Panel thanks the project team for engaging with the review process, and warmly welcomes the use of this site to provide much-needed emergency housing. The panel offers suggestions to support efficient delivery of the scheme, ensuring that resource is invested where it will add value to the residents' experience, and make management easier for the client.

By rationalising the ground floor plan, the scheme could deliver more for residents and reduce both build and running costs. This will also help the café to activate the high street frontage, helping with passive surveillance over the entrance sequence, and contributing to transforming the alleyway into a safe and welcoming access route. The internal circulation and meeting spaces should be inviting and straightforward to navigate, and must also comply with fire regulations. The amenity strategy should offer shared spaces with varying degrees of privacy.

A landscape architect's input would be hugely beneficial at this design stage, before a planning application, as it could provide a site-wide strategy for public, private and semi-private spaces, as well as dealing with site edge conditions, and ensuring that parking, refuse, and access are best accommodated to make the most of the site opportunities.

Residents' thermal comfort should be a priority for the sustainability strategy. Further work is needed to mitigate overheating across the scheme and its three conditions (heritage façade, existing building retrofit and new build). The new build structures should be far more ambitious in terms of sustainability and could work better as a single building.

The focus on single occupancy is appropriate, and the room sizes and layouts are successful. To make them exemplary, further detail should be developed to create a richer living experience, building on the client's understanding of resident needs, especially regarding storage. Opportunities for residents to learn new skills could be embedded in the shared spaces, to support their journey to recovery, wellbeing and independence.

The restoration of the existing building's historic façade is fully supported, and the top floor extension works well. However, the architecture of the extension could be developed to contribute more to the local context. The design of the new buildings could also be refined, to make them feel like home for residents.

Ground floor

- The panel supports the provision of a café. This will address the lack of café

options in the local area, activate the High Road frontage, and help with passive surveillance. It will also offer residents a convenient place to gain confidence in their ability to socialise in public spaces.

- The panel has significant concerns about the safety of the pedestrian and vehicle entrance off High Road, which is via an enclosed alleyway. While this will have CCTV, the undercroft space is dark even during daylight hours, and the café use will not provide additional overlooking at night. Locating the entrance foyer/waiting room adjacent to the alleyway will help with both daytime and nighttime surveillance.

- The alleyway will be gated for resident access only, but could still present a risk for vulnerable residents arriving home. It is important that it does not encourage antisocial behaviour or enable people to linger undetected.

- Further work is critical to improve the condition of the alleyway and ensure a safe and welcoming entrance experience. If possible, the bin store should be relocated as part of this so that residents do not have to walk past it on their way home.

- There should be an active, open entrance foyer with natural surveillance created by a series of communal and support spaces, becoming more private as residents move eastwards towards their individual rooms.

- At present, the location of the café prevents this arrangement and compromises the layout by subdividing the ground floor. This means that staff must manage three separate entrances: the first entry point from High Road into the waiting room to the north of the café, the residents' regular entrance via the alleyway to the south of the café, and the communal entrance to the east of the bin store.

- The panel recommends moving the café to the northern side of the High Road frontage, moving the waiting room and associated staff and communal spaces to the south, combining the entrances, and rationalising the circulation spaces.

- This would allow surveillance of a single shared point of entry, improving safety and building management. It would also reduce the amount of space given over to corridors.

- The panel understands that the complex ground floor layout is a result of working with an existing building. However, it is important in an emergency housing scheme that the internal layout is not challenging to navigate, and creates a place of sanctuary for residents.

- The bicycle store also takes up valuable indoor space. This should be relocated to a secure outdoor structure so that the internal ground floor space can be prioritised for support services.

- For example, the ground floor should have a crisis space with a shower and bathroom to address the needs of residents on first arrival, potentially direct from sleeping rough.

Landscape and amenity

- The panel recommends looking at the site from first principles in terms of constraints and opportunities. There should be a site-wite strategy to deal with parking, entrance sequence, refuse, bike storage, maintenance, staff, visitor and resident access. The panel recommends appointing a landscape architect who can help develop the site strategy.

- Access to green outdoor amenity space will be essential to resident wellbeing, improving their physical and mental health. A landscape architect will be able to design for variety and richness, while ensuring that the spaces can be managed effectively and maintained easily, to make the most of the communal garden to the rear – which is a positive feature.

- Given that the three parking spaces are for servicing, maintenance of the building and social worker visits, they are unlikely to all be in use at the same time for long stays. The panel therefore suggests rationalising the parking strategy, so it has less impact on the landscaping.

- The project team should test solutions where parking is moved to the south, away from the central garden; or where parking is more integrated into the landscape design.

- The panel is concerned that the gap between the rear of Buildings B and C and the site boundary will create a strip of wasted space. This is likely to gather litter, and could be a vermin, security and fire risk, particularly if residents smoke and drop cigarettes into this gap.

- While the requirement for maintenance access is understood, the panel also thinks that this strip of land could cause issues with the existing neighbours with private gardens immediately to the east.

- The panel asks for further work to develop a strategy for the site edges that will address these concerns. These areas could be gated, offering managed biodiversity. Alternatively, the building footprints could be positioned right up to the site boundary. The level change between the private gardens and the site would be a benefit for this solution.

- The panel understands that this user group has varied, but specific and complex needs, with many of those accessing emergency housing leading solitary lives. The amenity strategy should clearly respond this.

- The panel suggests developing a diagram to demonstrate the range of spaces from the public café to the private rooms, and the shared spaces in between. This will show how the scheme offers residents opportunities to interact with others in spaces of different degrees of intimacy, helping them to build up their confidence and social skills.

- The panel understands that too many amenity spaces would be difficult to manage. It recommends providing spaces within the garden that briefly bring people together enroute to their private rooms for moments of interaction.

- The panel encourages the project team to add some defensible space outside residents' ground floor windows. A small strip of planting would move people using the footpaths away from individual windows, offering some protection and privacy, which is particularly important for this user group.

- The covered walkways do not represent good value for money. The extent of the canopies should be reduced to only cover the areas directly over residential entrances. Alternatively, they could be removed, and the entrances could be recessed. This will create a moment of generosity for residents arriving home when it is raining, while saving costs.

Sustainability

- The panel asks for more detail on the sustainability strategy to be included in the planning submission materials. This will provide Haringey Council with confidence that sustainability has been fully considered and integrated. It should include the daylight and sunlight testing of the internal rooms and external amenity spaces.

- Given the potential for residents to have complex needs or to have experienced challenging living conditions, it is essential that the rooms provide a safe, comfortable, private environment to aid their recovery and wellbeing.

- As many of the rooms are single aspect, overheating is likely in some locations. The panel asks for more work to develop an effective overheating strategy, in balance with natural light.

- The application of brise soleil needs further thought as it is likely to conflict with heritage requirements, especially on the western High Road elevation. The panel suggests developing a diagram to inform the location of brise soleil, helping to ensure comfortable internal conditions.

- The rooms facing west in the top floor extension are particularly at risk of overheating due to their orientation and full height windows. Windows with a higher sill would allow sufficient daylight into the rooms but with a greatly reduced risk of overheating.

- There is an opportunity for the new build parts of the scheme to achieve far more in terms of sustainability, as they do not need to be retrofitted or to address heritage concerns. The panel asks for further work on this.

should be tested alongside the panel's suggestions for the courtyard landscaping and parking arrangement to ensure that they work together.

- There is potential to find efficiencies in the retrofit of the existing building. The project team should overlay the existing and proposed plans to scrutinise where money and materials could be saved by working closely with the existing layout.

Internal circulation and shared spaces

- The panel is concerned that the internal layouts do not meet current fire regulations. For example, there is no fire protected lobby around the lifts and no secondary means of escape from all internal spaces. The project team should check that the fire strategy has been fully addressed and integrated into the floor plans.

- The meeting rooms should allow views out, perhaps through glazed panels to ensure those inside feel safe while offering them privacy.

- The panel asks for further work to make the internal circulation more inviting, particularly the ground floor arrival sequence. The internal routes should be as straightforward as possible, corridor widths should be more generous, and consideration should be given to views at the end of corridors, helping with orientation and making them less intimidating.

Quality of accommodation

- It is positive that the project team is focusing on single occupancy rather than family accommodation, as it is not appropriate to mix the two user groups, and the scheme is not suitable for families in its current arrangement.

- The dimensions of the rooms and internal furniture layouts work well. The sample scheme completed by the same applicant also shows a quality of internal fit-out beyond the norm for emergency accommodation.

- The client has extensive experience delivering and managing emergency housing, and demonstrates a deep understanding of the occupants' needs. It is important that this is communicated in the planning submission, or in any future review materials, to build council and panel confidence in the proposal.

- To make the scheme exemplary, the project team is encouraged to invest more time developing the detail of the room layouts. These should build on the client's experience of how residents will live here, offering an environment where they can recover and gain independence.

- The project team should consider providing more storage for belongings, and spaces for activities such as drying clothes, eating, reading, and writing job applications within the privacy of their individual rooms.

- With careful design, these ambitions could be achieved in a low-cost way within the same room sizes – for example, by building in storage under the window sills. This would create a transformational experience for residents who may have previously been homeless. It would also provide a richer living experience, encouraging residents to feel pride in the spaces they inhabit.

- The panel also recommends embedding opportunities for residents to learn and develop in the communal spaces. For instance, if residents were allowed to use the laundry room, it would offer those who are willing and able the agency to look after themselves, and meet other people in the process.

- This would help to address the stigma often associated with emergency accommodation tenants and support them on their journey into settled sustainable housing.

Response to heritage

- The panel welcomes the removal of the 1970s cladding from the front and side elevations of the existing building, and the restoration of these façades to their original historic condition. This will contribute to the local townscape and the setting of the Tottenham High Road Historic Corridor/Tottenham Green Conservation Area.

- It would be good to understand the project team's analysis of the wider area, to ensure that the heritage response is informed by contextual research. This should also aid decision making, ensuring that money is invested where it will contribute the most value in terms of the building's character and context.

- Special attention should be placed on ensuring resident comfort within the rooms facing the High Road, to deal with sustainability considerations including overheating, given the heritage context.

Architecture

- The panel is comfortable with the proposed architecture, but suggests including a fuller explanation of the design approach as part of the planning submission documents.

- The setback and mansard roof of the single storey extension are successful.

- Further detailing to give the top floor extension more character and refinement would improve the building's external appearance and the way it sits in the High Road heritage setting.

- The detailing and material quality of the new build elements could also be improved, especially as they are not prefabricated. This would help to create a sense of pride for residents.

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Appendix: Haringey Development Management DPD

Policy DM1: Delivering high quality design

Haringey Development Charter

A All new development and changes of use must achieve a high standard of design and contribute to the distinctive character and amenity of the local area. The Council will support design-led development proposals which meet the following criteria:

a Relate positively to neighbouring structures, new or old, to create a harmonious whole;
b Make a positive contribution to a place, improving the character and quality of an area;
c Confidently address feedback from local consultation;
d Demonstrate how the quality of the development will be secured when it is built; and
e Are inclusive and incorporate sustainable design and construction principles.

Design Standards

Character of development

B Development proposals should relate positively to their locality, having regard to:

a Building heights;
b Form, scale & massing prevailing around the site;
c Urban grain, and the framework of routes and spaces connecting locally and more widely;
d Maintaining a sense of enclosure and, where appropriate, following existing building lines;
e Rhythm of any neighbouring or local regular plot and building widths;
f Active, lively frontages to the public realm; and
g Distinctive local architectural styles, detailing and materials.