APPENDIX 4: Internal and External Consultee Response

Stakeholder	Question/Comment	Response
Internal and external	The full consultee responses are set out below this table.	The consultee comments are directly addressed in the body of the report.
LBH Conservation	Further to my original consultation response the design and alterations proposed to the listed almshouses have been amended to help address the concerns raised. Since the initial submission, the heritage statement has been amended and added to cover aspects of the previously missing information and demonstrate more fully the considerable work and negotiation behind the design of the proposed development. The heritage statement now fully covers all aspects of the building, and more research has been undertaken to guide the impact assessment which has resulted in some changes to the alterations proposed. A condition survey of the building has now also been undertaken to help inform the baseline conditions of the building and the refurbishment of the buildings. This in conjunction with the structural survey and the impact assessment within the heritage statement have produced a much clearer and fuller assessment of the existing buildings and the works which will be required as part of the proposed development. This will allow appropriate conditions to control the detailed design stage of the development and ensure the significance of the listed buildings can be conserved appropriately. <u>Proposed pavilions and new flat block</u> The outstanding drawing inconsistences have been amended as part of the latest suite of drawings. The Victorian Societies comments on the design of the new flat blocks is noted, however the proposed flat blocks are located in in the corners and behind the courtyard buildings, which are not traditional locations for buildings within this layout. In this context a contemporary design is considered the appropriate response as they are discernibly new additions. Provided these buildings are of high quality, in both their materials and detailing, the new blocks should sit quietly in their context and have a neutral impact on the significance of the listed buildings, conserving their special interest. <u>Alterations to Existing Almshouses and Lodge House</u> As part of the application process there has been a considerable development of the conversion design. The changes in the design to the almshouses consist of: • Revision of the rear elevations to accommodate the retention of the original windows to the ground floor and the original rhythm of the rear elevations • Associated minor alterations to the ground floor layouts • Associated lower extent of demolition The amendments has alleviated the previously raised concerns that their loss would cause harm to the significance of the listed buildings and these amendments are welcomed and in line with the LPA's recommendations. The Victorian Societies comments may reflect that the original documents which included the loss of these windows and a schedule of the proposed window alterations will ensure these are kept and appropriately retrofitted. Whilst the condition survey and more detailed heritage statement demonstrate that the interior of the buildings have undergone a considerable redevelopment in the late C20 there are also a lot of modern finishes which, although unlikely, may be overlaid on top of more historic fabric. It is recommended that a contingency condition is attached to the listed building consent so that if any historic fabric is uncovered it can be appropriately accommodated within the design. As the buildings will undergo a large permanent change including areas of demolition and subdivision it is recommend that a level 1 building recording is undertaken in line with best practise and NPPF paragraph which states:	Noted. Conditions added.

	"*Local planning authorities should require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible. However, the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted."* Given the grade II status of the building, and the demonstrated condition of the interior of the building a level 1 recording, as set out in Historic Englands: *Understanding Historic Buildings: A Guide to Good Recording Practice.* A condition for a written scheme of investigation is recommended. <u>Servicing, Retrofitting & Renewables</u> As part of the development of the sustainability statement during the application process more works to retrofit the listed buildings and a deeper retrofit of the listed buildings is now envisioned. This will now include: • Secondary glazing to original windows • Internal wall insulation • Loft insulation • Under floor insulation • ASHPs to most units • Solar panels and ASHPs to the flat blocks have been refined to alter the number and location of these units and to ensure they are not visible from the ground There is a need to balance increasing the energy efficiency of the listed building against causing harm to the listed building. Conservation and sustainability have developed the sustainability strategy considerably with the applicant and these measures have been carefully considered as in principle the best way to balance both of these aspects of the proposal. The detailed design of these interventions will need to carefully take into account the significance of the listed buildings as well as technical considerations to ensure the long-term condition of the listed buildings. This will need to be controlled through the detailed design stage which can be accommodated through a set of conditions. <u>Landscaping</u> The various ancillary buildings and landscaping has been amended throughout the application. An appropriate design for the courtyard and the Bruce Grove street frontage is the most important part of the landscaping design to ensure it has an appropriate impact on setting of the listed buildings, the Conservation Area as well as the locally listed garden itself. These amendments include • Removal of car parking all around the central green and a reduction to the recommended number car parking bays • Retention of the existing mature trees • Plans have now been provided for the separate bike and bin store which has been further amended in height The amendments to this aspects of the proposed development are welcomed and represent positive changes to bring clarity to the scheme. The changes to the parking has improved the scheme, the central green will no longer be encased in car parking and there is now scope for a high quality landscaping design to soften the impact of the required spaces. It is considered that this level of information is enough to develop an appropriate landscaping design during the detailed design stage of the scheme, controlled through an set of appropriate conditions to ensure the proposals have a neutral or beneficial impact on the significance of the almshouses, the Conservation Area, and the locally listed garden. <u>Overall</u>	

	The scheme has undergone a high level of scrutiny and design development so that the impact of the proposed development has been either mitigated or reduced in line with best practice. The impact to the Conservation Area, the adjacent listed magistrates court and the locally listed garden will be neutral, subject to condition. Whilst the proposed development would cause some less than substantial harm to the significance of the listed buildings, this should be balanced against the heritage benefits of helping ensure the long-term condition and use of the buildings. Accordingly, Conservation supports this proposed scheme.	
LBH Design	I am very familiar with the site and proposals, having been involved in pre-app and application discussions for this and previous proposals for this site stretching back to 2015 at least! Summary The length of time taken to get these proposals to the point where they are a planning application ready to be decided by the committee, and the extent of pre-application discussion and review, investigation of design alternatives and detailed examination of the history, form and significance of the existing site are considered to have been justified in these subtle, sensitive, cautious and elegant proposals. Site Location, Principal of Development 1. This application site is an existing nineteenth century, purpose-designed “campus” of almshouses, built by the Worshipful Company of Drapers and Sailmakers, one of the ancient City Livery Companies of the City of London, in pursuit of their charitable aims. 2. The site is located on the east side of Bruce Grove at its northern end. This straight street originally formed a private ceremonial avenue of approach to Bruce Castle, which is just to the north of the site, linking it to Tottenham High Road to the south, in the direction of London, when that mansion of medieval origin had more extensive grounds. In subsequent years up to the nineteenth century as the castle went through different uses and its lands were sold off, Bruce Grove became a street, lined with grand 18th and early 19th century houses at its southern end, a long unbroken run of which survive on the west side. Bruce Grove now forms a part of the A10 and terminates at a T-junction with Lordship Lane, a major east west arterial, in front of what’s now the main frontage of The Castle. 3. The Drapers & Sailmakers Company originally acquired a large triangle east of Bruce Grove, south of Lordship Lane, on which they built their original quadrangle facing Bruce Grove, with terraces of small single bedroom, two-storey houses and the central chapel forming the other three sides, with short terraces continuing up and down the Bruce Grove frontage. Subsequently, a large triangle to the north-east, facing Lordship Lane and extending close to the back of the main range was sold to build Tottenham Magistrates Court, whilst smaller plots to the north-west corner, where Bruce Grove meets Lordship Lane, and in the southern corner, were sold for small private flatted blocks in the inter-war years. At some point a single storey laundry was built in the large remaining landscaped area to the east of the site, where the site reaches the back gardens of Victorian two-storey terraced houses on Elsden Road to the east, and in the 1970s the almshouses were extensively altered, from individual houses into small clusters of flats and bedsits, with some then-contemporary infill to the south. 4. The site and its existing buildings are statutory listed Grade II and are located within the Bruce Castle Conservation Area, which also includes the magistrates court, flatted blocks either side, properties on the opposite side of Bruce Grove, Bruce Castle itself and its park, and properties to the north and west of the castle. The separate Bruce Grove Conservation Area covers most of the southern end of Bruce Grove, as well as a significant section of Tottenham High Road, with most of the rest of the High Road covered by other Conservation Areas. But the rest of the	Noted. Conditions added.

	surrounding, mostly residential, hinterland, including Elsden Road who's houses back onto the eastern edge of the site, are not protected by Conservation Area status. 5. The site is not a formal Site Allocation, is just outside of the Tottenham AAP area, and apart from its Heritage and Building Conservation status has no specific planning policy designations. Site Layout 6. The proposals would retain and enhance the main quadrangle of original almshouses, centred on the chapel and open to Bruce Grove, with all of those almshouses returned to single dwellings and the chapel retained and improved as a community asset, available for religious and non-religious hire. The almshouses are then to be altered back from the 1970's flat conversions into individual houses, but "modernised" to better appeal to contemporary, open-market, home buyers; for it is intended they will then be sold for the highest price obtainable, rather than retained as almshouses or any form of subsidised housing or homes for any particular group. The applicants explain that the proceeds from these sales will only be used for the furtherance of their charitable aims, either locally or elsewhere in London. 7. The physical alterations to the almshouses are only internal and to their rears, so will not be visible at all from the central courtyard, and it is likely they will only be briefly glimpsed from Bruce Grove. However, some pairs of the original houses will be combined to create a single larger house, and where currently and originally two front doors shared the distinctive hipped porches, in most cases one door will be fixed closed, although with no change to their external appearance. Details of how different elements of the listed almshouses will be refurbished, including design of any replacement elements or components, and how their energy performance can be improved, are not provided with this application, and will have to be controlled through conditions and/or detailed Listed Building Consent Applications. 8. A short section of 1970's infill towards the southern end of the site, facing Bruce Grove, will be removed, recreating a gap between the short original terrace of almshouses facing the street south of the quadrangle and the original gatehouse, a larger, standalone version of their standard almshouse. This gap will be partly filled by a new detached house, designed with elements of a modern reinterpretation of the original almshouses and elements of a modern reinterpretation of the original gatehouse, and separated from that by a narrow roadway providing access to the proposed new flats behind. However, its' more important relationship will be its' closer relationship to the re-exposed (following removal of the '70s infill) flank elevation to the short row of original almshouses to its left, facing Bruce Grove. This relationship will be that it will act as a bookend, similar to and matching the bookend formed by the flank next to the other end of this terrace, as well as framing, alongside the gatehouse, a new opening into the space behind the almshouses. 9. This route through will lead to the largest new intervention, a part-two, part three storey block of one-bedroom flats, to be reserved for older people, the only definite instance in this development of the charitable housing aims being retained on site. This block effectively replaces the single storey, post-war, concrete, laundry building, albeit that it is substantially bigger, which is not a concern as this area of the site has a large amount of space available. Other than the laundry, this area is currently a rather unused, informally landscaped part of the site, some of which had in the past been used (but not, it is believed, for the past 10 years) as residents' allotments. The corner of this new block, along with trees and landscaping beyond and to the site, will be visible through this gap, as will the communal front door when viewed at an angle, as shown on page 46 of the applicants' Design & Access Statement, but following extensive discussions, the third floor has been pulled back at its north-western end, and preparation of measured three-dimensional views, it has been confirmed (see p. 50 of the DAS) that it will not be visible at human eye level from any place within the central quadrangle. 10. The final intervention is that two small blocks, each containing two flats, which will be inserted in the corners of the quadrangle. These will not be visible when viewed straight on, on the main	

	paths to the edges of the quadrangle, but a glimpse of them will be when viewed at an angle, from its landscaped centre. They are designed to be subservient to the long terraces of existing original almshouses, maintaining the same distance from both of the two flank elevations as the existing width of the gap between the existing side and main terraces. 11. This layout is considered acceptable in urban design terms. There is a clarity between public and private realms, with the only new areas of public realm being the short roadway/path to the communal front door of the flatted block, and the gated path to the small "wild garden" in the north-east corner of the site. Precise arrangements for access to this path and wild garden are unknown, and should probably be conditioned; potentially it would be safest for it to be locked with only residents, selected residents, or in extremis, site management or a reputable wildlife organisation having access, should issues of antisocial behaviour and/or crime be associated with this. 12. The route to the flatted block, although somewhat crooked, maintains a clear sight line from Bruce Grove to the front door, is short, well overlooked from the flatted block and surrounding houses, including the front door to the new gatehouse, and will be otherwise bounded by high hedges to the private gardens to the existing and new gatehouse and two of the ground floor flats. Details of the security of these boundaries should also be secured by condition. Streetscape Character, Height, Bulk & Massing 13. The existing character of the site is that of a campus or cloister, separated from the wider streetscape, with the character & psychological barrier of the fence and gates along Bruce Grove (albeit that the gates are not ever closed), the open green of the great courtyard and the consistent architectural form of the repeated almshouses and similar if grander chapel & gatehouse. Nevertheless, this is visible, "on display" from the busy street of Bruce Grove, and public access is not prevented. 14. Access for vehicular traffic to the lanes around the sides of the central courtyard and along the short arms to north and south alongside Bruce Grove through three sets of gates off Bruce Grove. Somewhat regrettably, residents' parking spaces are proposed to the central courtyard and both north & south lanes, rather than opportunities being taken from the less useful and less visible available space to the sides and rear. It is a well-known phenomenon that people value being able to see their car from their home, and that secluded poorly secured car-parking can be a security concern. However, in design terms it would be preferable for there to be no long-term parked vehicles in the central courtyard, for cars parked on the northern and southern arms to be on the boundary side, rather than the building side, and for any further parking required to be in well-overlooked or secure locations to the sides and rear of the almshouses, such as to the flanks of the terraces or around the Apartment Building entrance; it is suggested a condition and informative be included requiring details of the parking to be agreed, avoiding any more than the minimum long term parking in the central quadrangle. 15. The spaces behind the long rows of almshouses are proposed to remain as existing as of a much quieter character, albeit of two distinctly different characters. The land immediately behind the almshouses, where their single storey lean-to currently open onto a communal strip of grass and a concrete path, are proposed to be converted into individual private gardens. This is considered to be a great improvement in urban design terms, providing secure boundaries and clear sense of ownership. However, it would appear "dirty" access for garden deliveries, access to residents' cycle stores etc., would need to go through houses; a locked rear garden path giving controlled secure access to residents' back gardens could be advisable and would be an easy amendment to make. 16. Ground floor flats in the flatted block also have a private garden, in addition to their "balcony" recess, as they have exactly the same floor plans as upper floors, who's only outdoor amenity space is their recessed balcony. Both ground and first floor flats to the corner pavilions appear to also have their own private garden. The rest is part of the "wild garden" mentioned in paragraph	

	11 above, where the need to confirm security of boundaries by condition was mentioned and should be reinforced here. It would not be acceptable in design terms either for plot boundaries, especially those to shared paths or the public realm, to be ambiguous, or not to be well designed, in good quality, durable, attractive materials appropriate to this delicate heritage context, preferably either brick or hedges. Block & House Form, Rhythm, Fenestration, Materials & Detailing 17. Retained & modified existing original almshouses are of a design and form that will basically replicate, or form replacements of parts of existing lean-tos, some in the most secluded locations with modest “outrigger” extensions to their rears. These are carefully designed to satisfy heritage considerations, following close consultation with Conservation Officer colleagues, and are considered in design terms to be compatible, modest and elegant. 18. The one new house, next to the existing Gatehouse, is designed as a contemporary reinterpretation of the typical existing almshouse, whilst also responding to and to an extent reflecting that of the Gatehouse. Its simple design, including the blank end gable facing Bruce Grove, reflects the existing almshouses including their blank gable. 19. Both new blocks (the one larger apartments block & the two corner blocks) are of a simple design, a rectilinear form and a modest, recessive rhythm of fenestration, between their stronger projecting horizontal bands and flat roofs. Their forms mark them out as contemporary, avoiding competing with the existing almshouses or being mistaken for part of the original development. Considerable care has gone into ensuring they will provide good quality homes, in attractive, private, landscaped settings, with clear routes of approach, whilst being as hidden and tucked away from the main historic set pieces of the great central landscaped courtyard and of the Bruce Grove frontage. 20. Brick is the dominant material and will be a consistent buff brick to match the existing almshouses, with a darker buff brick to projecting horizontal banding, to provide a slight contrast similar to but less strident than the red brick horizontal bands of the existing almshouses. This should provide sufficient elevational richness to composition as requested by the QRP, without letting the new buildings stand out or compete with the listed existing buildings. Choice of brick will, as usual, need to be conditioned, to be agreed before construction in consultation with Officers. 21. Conditions should also control detailing of key details in both new build elements and alterations & extensions to existing buildings, to ensure durability, elegance and compatibility with the existing listed buildings, in consultation with both design and conservation officers. This should include balcony cills, balustrades, and soffits, parapets to flat roofs, eaves, verge and ridge details to pitched roofs and window details to new and extended or altered existing blocks, as well as junctions to existing buildings. Residential Quality (flat, room & private amenity space, size, quality, privacy and aspect) 22. All house and flat and room sizes comply with or exceed minima defined in the Nationally Described Space Standards, as is to be routinely expected. All flats and houses are at least dual aspect, many triple, and since the site alignment is at about 45 to the compass, northerly aspects are avoided, and almost all flats and houses benefit from at least one sunny south-easterly or south-westerly aspect, the only exceptions being the two flats in the left hand Corner Pavilion, and three flats in the Apartment Building, which are dual north-east and north-west facing, but benefit from views over particularly well landscaped areas within the site or its neighbours. 23. Generous private gardens are provided to all houses and ground floor flats, and balconies are provided to upper floor flats. All flats and houses have access to the generous landscaped shared private communal central courtyard, which provides landscaped relaxation and childrens play space to more than meet needs and requirements.	

24. The only existing residential neighbours in close proximity are the houses on Elsden Road to the east of the site and the flats at no. 68E Bruce Grove to the south of the site. No new buildings will be closer than the existing Gatehouse to no. 68E, so it will not experience any greater loss of privacy. The new apartment block will be closest to the houses on Elsden Road, but it will be set out at about 45˚ to these houses, and its closest corner will be about 18m from the nearest face of the houses' rear projection. As 18m is considered to be the closest distance where a human face can be recognised, distances greater than 18m are not considered to create any privacy concern, notwithstanding that the difference in angle will make the *really* experienced proximities greater still. There is also fairly dense vegetation along the boundary, in both this application site and the neighbouring houses gardens, and the landscape proposals for this application will further densify the vegetation.

25. The layout of the proposals is largely determined by the existing layout, with rear extensions to the original almshouses only modestly increasing their rear projections, and the four new build blocks set out within the form, pattern and separation between blocks of the existing to avoid overlooking between homes within the development. Considering the density of residential accommodation in and around the site and the complexity of this design, it is further testament to the quality and sophistication of this proposal that it creates no privacy concerns.

Daylight and Sunlight

26. Of relevance to this section, Haringey policy in the DM DPD DM1 requires that:

> *"…D Development proposals must ensure a high standard of privacy and amenity for the development's users and neighbours. The council will support proposals that:*
>
> *a. Provide appropriate sunlight, daylight and open aspects (including private amenity spaces where required) to all parts of the development and adjacent buildings and land;*
> *b. Provide an appropriate amount of privacy to their residents and neighbouring properties to avoid overlooking and loss of privacy detrimental to the amenity of neighbouring residents and residents of the development…"*

27. The applicants provided Daylight and Sunlight Report on their proposals and of the effect of their proposals on neighbouring dwellings. These have been prepared fully in accordance with council policy following the methods explained in the Building Research Establishment's publication "Site Layout Planning for Daylight and Sunlight – A Guide to Good Practice" (2nd Edition, Littlefair, 2022), known as "The BRE Guide".

28. In terms of day and sunlight impacts on existing neighbours, the same considerations as noted under privacy in paragraph 24 above reduce the likelihood of any detrimental impact, and the applicants consultants' report finds no loss of daylight to any neighbouring properties, and a small loss of sunlight (annual hours but no loss for winter hours). This is a good performance for development in an urban location, especially considering that the existing site is unusual in having no buildings above one storey in the area closest to the houses on Elsden Road, a condition residents could not reasonably expect to continue indefinitely.

29. Regarding the daylight and sunlight levels modelled to be achieved in the proposed development, results are less wholly positive, but this is considered largely understandable given that the development consists of conversion of listed buildings and careful sensitive insertions in spaces between them in a conservation area. 62% of habitable rooms are found to meet the BRE standard for daylight, 73% for sunlight, with existing converted listed almshouses particularly suffering regarding daylight, with existing small windows, which cannot be enlarged, whilst the new corner pavilions have understandably poorer sunlight performance due to their predominantly northerly or easterly outlook. Surprisingly low day and sunlight levels to the proposed new build apartment block are most probably due to their deeply recessed balconies

	being the main window location for their living rooms, done to minimise disturbance and overlooking from this new block to existing neighbours 30. Overall, given that residents will get compensatory benefits from living in a secluded, peaceful, lavishly landscaped, historic precinct in a desirable location close to amenities, residents of those new dwellings that have less good daylight and / or sunlight (and it is not generally the same who loose both), will have chosen to live here and will still benefit from generous amounts of well daylit, well sunlit landscaped private and communal amenity space.	
LBH Transport	Development proposal This application is for redevelopment of the charity owned dwellings within Edmansons Close in Tottenham. The intention is to bring the private housing provision at the site up to current standards given many of the existing units are both dated and too small. At present the site includes 61 residential units, including 48 studio flats, plus 1 No. 1 bed and 12 x 2 bed units, all of which are owned and maintained by The Draper's Almshouse Charity. Existing facilities for residents include a Community Hall for social activities within the old Chapel and a laundry building. The redevelopment proposals include the following; • Demolition of existing laundry building and 1970s infill building • Alterations and extensions to 44 existing almshouses to create 8 No. 1 bed, 12 No. 2 bed and 6 No. 3 bed units • Alterations to the existing Gatehouse to provide a 2 bed unit • Construction of a new build 3 bedroom almshouse to replace the 1970s infill building • Construction of a new apartment building comprising 7 No. studio units and 9 No. 1 bed units • Construction of 4 No. new build 2 bedroom units within two new pavilions (2 • units in each pavilion, 4 units in total) • Improvements to access arrangements and provision of five disabled car parking spaces. In total 52 residential units will be provided, a decrease of 9 compared to present. It is understood that the units are currently empty, with the last occupiers leaving in the last year or so. Location and access The site is accessed directly from Edmansons Close, which is a private road connecting to Bruce Grove. The site is located to the eastern side of Bruce Grove, south of Lordship Lane, and to the immediate west of the Magistrates Court. It has a PTAL value of 4/5 varying across the site, which is considered 'good' to 'very good' access to public transport services. 10 different Bus services are accessible within 2 to 8 minutes' walk of the site, plus Bruce Grove railway station is an 8 minute walk away too. Bruce Grove is on Transport for London's Road Network (TLRN) who are the Highway Authority rather than Haringey. The site is located within the Bruce Grove North CPZ, which has operating hours of 0800 – 1830 Monday to Saturday, plus extended hours on Match and event days. Transportation considerations This is a smaller development than existing in terms of unit numbers, however there are other changes in transportation characteristics to consider. There will be a proportion of family sized homes which are not provided at present. Trip generation As covered in the development description, there will be overall a reduction in total unit numbers, however 7 three bedroom/family sized units will be provided, that may have higher trip generation	Noted. Conditions added.

	capabilities compared to one or two bedroom units. In any instance overall the development is smaller than the existing site set up. The Trip Generation derivation included within the TA predicts total and vehicle trips for both existing and proposed configurations of the site. Given there will be an overall reduction the total numbers of person trips are predicted to reduce from 359 to 302 daily, and given there are only 5 accessible parking bays provided total vehicle trips will be minimal and not of any consequence in transport network and highway capacity terms. Access At present Edmansons Close operates a one way regime from north to south connecting to Bruce Grove at both ends. The existing road varies between 3.3 and 4.6m wide. This proposal retains that regime/arrangement but is including widening of the carriageway in places to facilitate easier access for refuse collection and other larger delivery and service vehicles. At present larger vehicles end up passing over the lawns in places. Swept path plots have been provided for a fire tender, refuse collection vehicle, and both 6m and 8.1m long delivery vans. These swept path plots appear fine. However, there doesn't seem to be anywhere in the application any clear details on the locations where the existing road alignment is to be changed/widened nor what the widths will change to. This should be clarified and details provided. Pedestrian access will remain as existing. Car parking considerations There are approximately 40 informal spaces at present along Edmansons Close. Given the demographic of some of the previous occupiers, very little car parking has historically taken place, which was predominantly from visitors to previous occupiers. The parking stress survey discussed below recorded only 6 cars parked overnight per evening, so existing demands are minor. Subsequent to the parking stress surveys it is understood that the existing units at the site have been vacated. The parking stress surveys were carried out during 2020, which could have been during the COVID lockdown. Although these comments are being drafted in 2025, the application was submitted in 2022, and it is generally considered that for the purposes of assessing this development proposal, they are sufficient as many occupiers were staying at home during the lockdowns. The parking stress survey found survey area wide parking stress at 54% on one night and 55% on the other, which meant there were 226 free spaces out of 497 within the 200m walk survey area. It is noted also that only 6 cars were parked within Edmansons Close both nights, with 29 spaces unused. The developer is proposing a considerable reduction in car parking, reducing to 5 No. blue badge spaces in total. This is appropriate in part when considering the London Plan which details for sites of PTAL 5, car free should be the default (except for accessible units). For PTAL 4, up to 0.5 – 0.75 spaces per dwelling is detailed. This site has values of both 4 and 5 across it and is quite close to shops and local services and public transport services so overall, taking this into account plus existing parking levels, the parking provision is considered appropriate. The site is located within the Bruce Grove North CPZ, which has comprehensive operating hours. The development will need to be formalised as permit free/car free as per policy DM32, so the applicant will need to enter into a S106 or similar agreement to formalise this, and meet the Council's administrative costs. Car club provision Transportation consider it appropriate that a car club facility is provided for occupiers of this redevelopment. It is not fully clear what the demographic of occupiers will be, given these are private units rather than housing association. The car parking levels proposed are appropriate but additional	

	demands could arise from some households so a car club could mitigate future parking demands within the wider area. This can be covered by the S106, and the applicant should obtain written recommendations from an appropriate car club provider for this development and implement them. It is expected this will include memberships for three years plus a driving credit for each unit, and potentially provision of a car/space within the locality of the site. Cycle parking For the residential provision proposed, to meet the numerical requirements of the London Plan, 81 residential cycle parking spaces and 3 visitor spaces should be provided. It is noted the applicant's proposals are for 2 visitor spaces, however London Plan standards do detail 2 visitor spaces for up to 40 units, the one space per 40 units after this so 3 are required. There doesn't appear to be any clear details provided for all of the proposed cycle parking arrangements. The updated Transport Statement (appendix D) is for car and cycle parking but only shows a single cycle store containing 18 spaces towards the southern end of the development. The TA references the houses will have secure weatherproof storage in back gardens, and the flats secure cycle stores within buildings. Transportation do require fully dimensioned layout and installation details for the long and short stay cycle parking, to demonstrate adherence with the London Cycle Design Standards. This information is required prior to commencement of any physical works at the site and a pre commencement condition is included. Delivery and servicing arrangements Delivery and service vehicles and refuse/recycling collection vehicles will progress along Edmansons Close, and a swept path plot for a collection vehicle is included within appendix E of the TA. The TA references location of bin stores within 25m of the collection point, and it is noted that Haringey's waste and recycling team have commented on the proposals and are supportive of the proposed arrangements. Travel Plan The TA includes description of a Framework Travel Plan for this development, and the proposed scope/content of it. TfL's Travel Planning guidance details for residential development of between 50 and 80 units, a Travel Plan Statement is appropriate rather than a Framework Travel Plan. Construction arrangements and logistics plan The applicant has included a draft of a Construction Logistics Plan. This is quite informative, and a number of aspects of the proposed arrangements are noted; • 2 year build out/programme • 1 way access arrangements into the hoarded site, to replicate the one way arrangement in place at present (North to South) • Slot booking will be used for all construction related arrivals, and an outline estimate is for 15 to 20 HGV's a day. This will need to be refined for the different phases of work and presented in an updated CLP prior to commencement of construction. • Largest vehicles to visit will be 10m tippers, 8.4m readymix lorries and 8m 7.5 tonne box and flatbed lorries. • Wheelwash arrangements will be utilised at the vehicle exit back onto Bruce Grove • All arrivals and departures will be restricted to between 0930 and 1530. Overall, this document is useful, however will require some updating/refinement with respect to construction vehicle numbers dependent on the programme activities and also it needs to be clarified if the existing buildings are all to be decanted completely or not.	

	Summary This proposal is for redevelopment of the existing Edmansons Close almshouses site, to provide up to date accommodation to modern standards. There will be a reduction in the total number of units from 61 to 52. From the transportation perspective, the travel demands will be very similar to (and slightly less) the existing units at the site. There will be a considerable reduction in car parking, with only 5 blue badge pays provided in total. This does suit current London Plan policies and reflects that existing parking demands are very low, as recorded with the Parking Stress Survey provided in the application. The whole development will be suitable for formal designation as car free/permit free to accord with Policy DM32, and it is appropriate for a car club facility to be provided. Cycle parking will be required to meet London Plan and London cycle design standards, clarity is needed in relation to the proposed arrangements for which a condition is included. A worked up Construction Logisitcs Plan will also be required given the site's access/location off the TRLN. Subject to the following S106 obligations and conditions, Transportation do not object to this application. S106 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 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, £3,000 (three thousand pounds) per year for a period of five years £15,000 (fifteen thousand pounds) in total for the ,monitoring of the travel plan initiatives. Reason: To enable residential occupiers to consider sustainable transport options, as part of the measures to limit any net increase in travel movements. 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	

	£10,000 (ten 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 Wood Green area and to encourage modal shift and reducing overall vehicle numbers. To give the Council an overview of the expected logistics activity during the construction programme. To protect the amenity of neighbouring properties and to maintain traffic safety. Conditions Cycle Parking The applicant will be required to submit to the Highway Authority plans showing 81 accessible; sheltered, and secure cycle parking for long-stay residential cycle spaces, with 3 residential long-stay spaces located in a more accessible location for approval before development commences on site. 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). Reason: To ensure that cycle parking is provided in line with the London Plan 2021 and the London Cycle Design Standard (LCDS)	
LBH Carbon Management	In preparing this consultation response, we have reviewed: • Energy Statement prepared by Hodkinson (dated 27 Feb 2025) • Dynamic Overheating Report prepared by Hodkinson (dated September 2024) • Relevant supporting documents. **1. Summary** The applicant has updated the energy statement which now proposes a site-wide carbon reduction of 65% (New Build – 75% and refurbishment 62%). This is achieved with efficient fabric elements, individual air-source heat pumps, direct electric heating (for small 1-bed almshouses) and 16kWp Solar Photovoltaic system. Although, there has been an improvement in the proposed building fabric specification of the refurbished almshouses, the very high Energy Use Intensity (EUI) and Space Heating Demand (SHD) is alarming, which results in high energy costs for the future occupants. The submitted Life Cycle costs analysis of the heating system for new build and refurbishment shows, the heating system's operational costs for refurbished almshouses is almost 2.5 times than that for new build. Acknowledging the heritage and conservation constraints in the existing dwelling, the applicant is required to maximise all opportunities to improve the energy efficiency of the existing dwelling and minimise the EUI and SHD for better energy security of the occupants. Planning conditions have been recommended to secure the benefits of the scheme. **2. Energy Strategy** An updated energy assessment has been carried out with the proposed fabric parameters and the assessment for the refurbishment now is based on the notional figures for existing building in line with the Energy Assessment Guidance 2022 and Approved Document L.	Noted. Conditions added.

The revised energy statement proposes an overall site-wide reduction of 65% in CO_2 emissions with SAP10.2 carbon factors, from the baseline development model (which is Part L 2021 compliant). This represents an annual saving of approximately 59.4 tonnes of CO_2 from a baseline of 91.9 tCO_2/year.

The calculated unregulated emission for the development is 57.5 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	91.9		
Be Lean	67.4	24.5	27%
Be Clean	67.4	0.0	0%
Be Green	32.5	34.9	38%
Cumulative savings		59.4	65%
Carbon shortfall to offset (tCO_2)	32.5		
Carbon offset contribution	£95 x 30 years x 32.5 tCO_2/year = £92,625		
10% management fee	£9,262.5		
Total	£101,887.5		

Residential New Build (SAP10.2)			
	Total regulated emissions (Tonnes CO_2 / year)	**CO_2 savings (Tonnes CO_2 / year)**	**Percentage savings (%)**
Part L 2021 baseline	17.1		
Be Lean	13.9	3.2	19%
Be Clean	13.9	0	0%
Be Green	4.3	9.6	56%
Cumulative savings		12.8	75%
Carbon shortfall to offset (tCO_2)	4.3		

Residential Refurbished Buildings (SAP10.2 emission factors)			
	Total regulated emissions (Tonnes CO_2 / year)	**CO_2 savings (Tonnes CO_2 / year)**	**Percentage savings (%)**
Part L 2021 baseline	74.8		
Be Lean	53.5	21.3	28%
Be Clean	53.5	0.0	0%
Be Green	28.2	25.3	34%
Cumulative savings		46.5	62%
Carbon shortfall to offset (tCO_2)	28.2		

Energy – Lean

Refurbishment:
The applicant is proposing an improvement to the external walls with a U-value to 0.55 W/m^{2}K subject to consideration of condensation, vapour management and overall health of the building envelope. The report suggests this can be achieved with the following measures:

- 37.5mm high performance PIR insulated plasterboard (12.5mm plasterboard included and integrated AVCL).
- Cellulose insulation blown behind existing plaster lining (e.g. if lath and plaster present)
- 10mm Aerogel blanket applied to inner face and plastered or 26mm Aerogel lined Magnesium Oxide board.
- 50mm natural fibre (wood, hemp, cellulose, mineral wool) between timber drylining, with 12.5mm plasterboard.

This is supported. However, the proposed U-value will not result in improvement against the notional u-value of external wall of an existing building (ref. to the table below). Therefore, it is recommended to aim for a u-value of 0.55 W/m^{2}K or better and not to reduce it which will worsen the energy efficiency of the building fabric.

	Residential Notional Specs for existing Building (Energy Assessment Guidance 2022)	**Refurbishment Baseline**	**Proposed Specs for Refurbishment (Be Lean)**
Floor u-value	0.25 W/m^{2}K	0.25 W/m^{2}K	0.40/45 W/m^{2}K (GF) 0.11 W/m^{2}K (1st & GF)
External wall u-value	0.30-0.55 W/m^{2}K	0.55 W/m^{2}K	0.55 W/m^{2}K
Roof u-value	0.16 W/m^{2}K	0.16 W/m^{2}K	0.11 W/m^{2}K
Door u-value	1.60 W/m^{2}K	3.00 W/m^{2}K	3.00 W/m^{2}K (front door) 1.40 W/m^{2}K (rear door)
Window u-value	1.60 W/m^{2}K	1.5 W/m^{2}K	Existing single glazed windows to be added with secondary glazing providing 2.5 to 2.9 W/m^{2}K
Air permeability rate	Default – determined by fabric element types	15 m^3/hm^2 @ 50Pa	8 m^3/hm^2 @ 50Pa
Heating system – Be Lean (efficiency / emitter)	Notional specs of the existing heating system as per Section 6 of the Approved Document L1	Gas Boiler with 89.5% efficiency 100%	Gas Boiler with 89.5% efficiency

Energy Use Intensity / Space Heating Demand
The reported Energy Use Intensity (EUI) and Space Heating Demand (SHD) for the new build and refurbishment part of the proposed scheme are as follows:

Building type	**EUI (kWh/m^2/year)**	**Space Heating Demand (kWh/m^2/year)**	**Methodology used**
New Build	55.8	22	

Refurbishment	100.9	105.3	SAP 10.2 for regulated, PHPP for unregulated

It can be noted that the EUI is very high than the GLA benchmark 35 kWh/m^2/year and is almost three times higher for the refurbishment. Similarly, the SHD for refurbishment is seven times higher than the GLA benchmark, which raises several concerns including the costs of energy bills for the future occupants. **The applicant is required to explore all possible measures to minimise both EUI and SHD, as much as possible.** The energy costs are also evidenced by the life cycle cost analysis presented in the report (ref. appendix E, shared below).

Heating Operational Costs	**Individual ASHPs – New Build**	**Individual Electric Boilers - Refurb**	**Individual ASHPs - Refurb**
Cost of Heat (£/year)	£380	£1,649	£2,226
Dwelling Plan Maintenance (£/year)	£276	£276	£195
Dwelling Plant Replacement (£/year)	£339	£339	£137
Total (£/year)	**£995**	**£2,264**	**£2,558**

Energy – Green

Refurbishments:

The applicant is proposed a full electric heating solution for the scheme including:

- Individual direct electric heating for one bed almshouses unit,
- Individual air source heat pumps for 2 and 3 beds almshouses and new build.

The applicant has explored opportunities to install Solar PV on the roof of the existing building. In line with the heritage and conversation considerations, the roof which are not visible from the road are deemed viable for solar PV installation, however as per the report these roofs are mostly oriented towards the north, which is less efficient orientation, therefore Solar PVs are not proposed as part of the refurbishment.

New Build:

The applicant is now proposing Solar PV system in all available new build roof spaces. A 16kWp solar PV system is proposed with 47 panels of 350W each at an angle of 5-10 degrees towards southerly direction. In line with the London Plan SI2, the applicant must maximise the opportunity of on-site energy generation and therefore, are required to provide evidence of maximising solar PV coverage on the available new build roof space at later stages.

3. Overheating

The applicant has remodelled the overheating analysis using the LWC weather files for DSY1-3 2020s. Fourteen representative dwelling units from the new proposed dwelling on site have been assessed. All dwellings pass the CIBSE TM59 criteria when assessed assuming no usability constraints in opening of the windows, which indicated the passive design measures have been maximised.

However, when applying the windows opening constraints during sleeping hours in the accessible units within the apartment blocks, a number of spaces fail the CIBSE TM59 criteria B – showing overheating risks. To mitigate this residual risk of overheating, it is proposed to install an ‘air tempering’ (also known as ‘peak lopping’) cooling coil bolt-on to the MVHR system within the affected dwellings. The air tempering system modelled is assumed to supply 0.97kW and 70l/s per dwelling.

The final overheating mitigation strategy for new dwellings are as follows:

- Natural ventilation with openable windows
- Solar control glazing with g-value of 0.40
- External shading provided by balconies to some apartments, as per design proposals
- External shading provided by an increase external reveal depth of 250mm
- External louvres sliding screens on south façade of the apartment building
- Enhanced mechanical ventilation rates of 2ach in bedrooms

Future mitigation strategies:
- The occupants will be provided with a Home User Guide to be prepared for distribution to residents at handover
- Installation of reflective blinds to further mitigate solar gains
- Use of plug-in fans to increase air-flow
- Utility cupboards and MVHR units to be designed to include air tempering cooling boil-on units as future mitigation measure.

The applicant has also undertaken a CIBSE TM59 analysis of the existing dwellings and the results show an increase from 7% to 100% passing of criteria A while all rooms fail Criteria B. Although bedrooms still fail, the number of nights exceeding the criteria has decrease from 31 nights annually to 7 nights.

For refurbished dwellings, the overheating mitigation measures are as follows:
- Improving glazing specifications
- Incorporating internal blinds
- Standing fans

4. Planning Obligations Heads of Terms

- Be Seen commitment to uploading energy data
- Energy Plan
- Sustainability Review
- Estimated carbon offset contribution (and associated obligations) of £92,625(indicative), plus a 10% management fee; carbon offset contribution to be re-calculated at £2,850 per tCO2 at the Energy Plan and Sustainability stages.

5. Planning Conditions

To be secured:

Energy strategy
The development hereby approved shall be constructed in accordance with the Energy Statement prepared by Hodkinson (dated 27 Feb 2025) delivering a minimum 65% site-wide improvement on carbon emissions over 2021 Building Regulations Part L (75% for new build and 62% for refurbishment) with high fabric efficiencies, individual air source heat pumps (ASHPs), direct electric heating (one bed almshouses) and a minimum 16kWp 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 fabric efficiencies of the new build to achieve a minimum of 19% reduction;*
- *Confirmation of the fabric efficiencies of the refurbishment will meet the following standards achieving a minimum of 28% reduction;*

	▪ *Floor U-value* *0.11 W/m²K* ▪ *Ground Floor U-value* *0.40 W/m²K* ▪ *External wall and internal partition U-value:* *0.55 W/m²K or better* ▪ *Roof U-value:* *0.11 W/m²K* ▪ *Front Door U-value:* *3.0 W/m²K* ▪ *Rear Door U-value:* *1.40 W/m²K* ▪ *Window U-value (with Secondary glazing):* *2.40 W/m²K* ▪ *Air permeability rate:* *8 m³/hm² @50Pa* - *Evidenced effort to reduce the Energy Use Intensity and Space Heating Demand to the GLA targets, limiting the development's heating demand to a maximum of 35 kWh/m²/year;* - *Details how thermal bridging will be reduced;* - *Location, specification and efficiency of the proposed ASHPs & direct electric heating systems (Coefficient of Performance, Seasonal Coefficient of Performance, and the Seasonal Performance Factor), with plans showing the 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 and air source heat pumps must be installed and brought into use prior to first occupation of the relevant block. Six months following the first occupation of that block, evidence that the solar PV arrays have been installed correctly and are operational shall be submitted to and approved by the Local Planning Authority, including photographs of the solar array, installer confirmation, an energy generation statement for the period that the solar PV array has been installed, and a Microgeneration Certification Scheme certificate. The solar PV array shall be installed with monitoring equipment prior to completion and shall be maintained at least annually thereafter.* *(c) Within six months of first occupation, evidence shall be submitted to the Local Planning Authority that the development has been registered on the GLA's Be Seen energy monitoring platform.* *Reason: To ensure the development reduces its impact on climate change by reducing carbon emissions on site in compliance with the Energy Hierarchy, and in line with London Plan (2021) Policy SI2, and Local Plan (2017) Policies SP4 and DM22.* ***Whole-House Retrofit Strategy and Monitoring*** *Prior to commencement of development a whole-house retrofit strategy detailing how the insulation will be installed to avoid damage to the fabric of the listed building, proposed monitoring arrangement shall be submitted and approved by the Local Planning Authority and all works will be required to conform with this strategy.* *This shall include but is not limited to:* - *Confirmation of the insulation proposed to meet the fabric efficiency requirements achieving a minimum of 28% carbon reduction;* - *Details of the Vapour Control Layer proposed for the building envelope;*	

	- *Analysis of effectiveness and impacts of proposed insulation strategy;* - *Hygrothermal analysis to key build-up with internal insulation and where necessary;* - *Submission of all thermal bridging junctions with plans showing how these are most optimally reduced;* - *Dew point analysis of the building envelope with internal insulation, thermal bridging junctions, and a strategy to mitigate any condensation risk and reduce the thermal bridging;* - *Provide details of technical specification of insulation materials (prioritising natural, breathable materials where possible);* - *Plans and sections should show what elements will be thermally improved, thickness and where;* - *Confirmation of air tightness delivery strategy;* - *The proposed ventilation strategy (including how indoor air quality will be dealt with);* *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, SI3, and Local Plan Policy SP4 and DM22 and DM49 of the Development Management* ***Overheating*** *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 Dynamic Overheating Report prepared by Hodkinson (dated September 2024) as a starting point, taking into account the outstanding requirements at application stage.* *This report shall include:* - *Revised modelling of units modelled based on CIBSE TM59, using the CIBSE TM49 London Weather Centre files for the DSY1-3 (2020s) and DSY1 2050s and 2080s, high emissions, 50% percentile 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;* - *Confirmation that the retrofit measures can be integrated within the design (e.g., if there is space for pipework to allow the retrofitting of cooling and ventilation equipment), setting out mitigation measures in line with the Cooling Hierarchy;* - *Confirmation who will be responsible to mitigate the overheating risk once the development is occupied.* *(b) Prior to occupation of the development, details of internal blinds to all habitable rooms must be submitted for approval by the local planning authority. This should include the fixing mechanism, specification of the blinds, shading coefficient, etc. Occupiers must retain internal blinds for the lifetime of the development, or replace the blinds with equivalent or better shading coefficient specifications.* *(c) Prior to occupation, the development must be built in accordance with the approved overheating measures and retained thereafter for the lifetime of the development:* - *Openable windows;* - *Fixed internal blinds with white backing;* - *Solar control glazing with g-value of 0.40* - *External shading provided by balconies to some apartments, as per design proposals* - *External shading provided by an increase external reveal depth of 250mm* - *External louvres sliding screens on south façade of the apartment building*	

	- *Enhanced mechanical ventilation rates of 2ach in bedrooms* - *Any further mitigation measures as approved by or superseded by the latest approved Overheating Strategy.* *If the design of Blocks is amended, will impact on the overheating risk of any units, a revised Overheating Strategy must be submitted as part of the amendment application.* *REASON: In the interest of reducing the impacts of climate change, to enable the Local Planning Authority to assess overheating risk and to ensure that any necessary mitigation measures are implemented prior to construction, and maintained, in accordance with London Plan (2021) Policy SI4 and Local Plan (2017) Policies SP4 and DM21.* ***Living roofs*** *(a) Prior to the above ground commencement of development, details of the living roofs must be submitted to and approved in writing by the Local Planning Authority. Living roofs must be planted with flowering species that provide amenity and biodiversity value at different times of year. Plants must be grown and sourced from the UK and all soils and compost used must be peat-free, to reduce the impact on climate change. The submission shall include:* *i) A roof plan identifying where the living roofs will be located;* *ii) A section demonstrating settled substrate levels of no less than 120mm for extensive living roofs (varying depths of 120-180mm), and no less than 250mm for intensive living roofs (including planters on amenity roof terraces);* *iii) Roof plans annotating details of the substrate: showing at least two substrate types across the roofs, annotating contours of the varying depths of substrate* *iv) Details of the proposed type of invertebrate habitat structures with a minimum of one feature per 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.* *viii) A section showing the build-up of the blue roofs and confirmation of the water attenuation properties, and feasibility of collecting the rainwater and using this on site;* *(b) Prior to the occupation of 90% of the dwellings 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.* ***Biodiversity*** *(a) Prior to the commencement of development, a Biodiversity Gain Plan shall be submitted to and approved in writing by the Local Planning Authority. This shall include the details of ecological enhancement measures and ecological protection measures, plans showing the proposed location of*	

	ecological enhancement measures, a sensitive lighting scheme, justification for the location and type of enhancement measures by a qualified ecologist, and how the development will support and protect local wildlife and natural habitats. A biodiversity net gain of 10% must be achieved. *(b) Prior to the occupation of development, photographic evidence and a post-development ecological field survey and impact assessment shall be submitted to and approved by the Local Planning Authority to demonstrate the delivery of the ecological enhancement and protection measures is in accordance with the approved measures and in accordance with CIEEM standards.* *Development shall accord with the details as approved and retained for the lifetime of the development.* *Reason: To ensure that the development provides the maximum provision towards the creation of habitats for biodiversity and the mitigation and adaptation of climate change. In accordance with London Plan (2021) Policies G1, G5, G6, SI1 and SI2 and Local Plan (2017) Policies SP4, SP5, SP11 and SP13.* ***Urban Greening Factor*** *Prior to completion of the construction work, an Urban Greening Factor calculation should be submitted to and approved by the Local Planning Authority demonstrating a target factor of 0.3 has been met through greening measures.* *Reason: To ensure that the development provides the maximum provision towards the urban greening of the local environment, creation of habitats for biodiversity and the mitigation and adaptation of climate change. In accordance with London Plan (2021) Policies G1, G5, G6, SI1 and SI2 and Local Plan (2017) Policies SP4, SP5, SP11 and SP13.*	
GLAAS	Recommend No Archaeological Requirement Thank you for your consultation received on 2022-12-06. The Greater London Archaeological Advisory Service (GLAAS) gives advice on archaeology and planning. Our advice follows the National Planning Policy Framework (NPPF) and the GLAAS Charter. NPPF section 16 and the London Plan (2021 Policy HC1) make the conservation of archaeological interest a material planning consideration. Having considered the proposals with reference to information held in the Greater London Historic Environment Record and/or made available in connection with this application, I conclude that the proposal is unlikely to have a significant effect on heritage assets of archaeological interest. I agree with the conclusions of the submitted desk -based assessment. No further assessment or conditions are therefore necessary. This response relates solely to archaeological considerations. If necessary, Historic England's Development Advice Team should be consulted separately regarding statutory matters.	Noted. Conditions added.
Metropolitan Police	Thank you for allowing us to comment on the above planning proposal, please find our representation fo the above application to London Borough of Haringey	Noted. Conditions added.

Section 1 - Introduction:

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

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

At this stage we have not met with the original project Architects to discuss Crime Prevention and Secure at pre-application stage to discuss our concerns regarding the design and layout of the developmer mention of crime prevention or Secured by Design in the Design and Access Statement, but it only refe and surveillance and does not offer any target hardening to the build environment. We request that th contacts us at the earliest convenience to ensure that the development is designed to reduce crime at a

At this point it can be difficult to design out fully any issues identified, at best crime can only be mitigated it does not fully reduce the opportunity of offences.

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

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

Section 2 - Secured by Design Conditions and Informative:

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

Conditions:

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

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

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

Reason: In the interest of creating safer, sustainable communities.

Informative:

	The applicant must seek the continual advice of the Metropolitan Police Service Designing Out Crime Of (DOCOs) to achieve accreditation. The services of MPS DOCOs are available **free of charge** and can b contacted via docomailbox.ne@met.police.uk or 0208 217 3813. ***Section 3 - Conclusion:*** We would ask that our department's interest in this planning application is noted and that we are advised **Decision Notice**, with attention drawn to any changes within the development and subsequent Conditi been implemented with crime prevention, security and community safety in mind. Should the Planning Authority require clarification of any of the recommendations/comments given in the please do not hesitate to contact us at the above office.	
Flood & Water Management	Thank you for consulting us on the above planning application reference number HGY/2022/4319 for the demolition of existing laundry building and 1970s infill building; alterations and extensions to 44 existing alms houses to create 8 x 1 bed, 12 x 2 bed and 6 x 3 bed units; alterations to existing Gatehouse to provide 1 x 2 bed unit; construction of 1 x new build 3 bed alms house to replace 1970s infill building; construction of a new apartment building comprising 7 x studio units and 9 x 1 bed units; construction of x new build 2 bed units within two new pavilions (2 units in each pavilion, 4 units in total); with landscapi improvements to access; car parking; and ancillary development thereto at Edmansons Close, Bruce Grove, London, N17 6XD Having reviewed the applicant's submitted SuDSmartpro report reference number 73492.02.01R2 revisi Final dated 16th February 2022 as prepared by Geo Smart Information Consultant along with SuDS Proforma, we are generally content with the overall methodology as used and mentioned within the abov report, subject to following planning conditions to be implemented regarding the Surface water Drainage Strategy and it's management and maintenance plan. Surface Water Drainage condition No development shall take place until a detailed Surface Water Drainage scheme for site has been submitted and approved in writing by the Local Planning Authority. The detailed drainage scheme shall demonstrate: a) A hydraulic calculations using XP Solutions Micro-Drainage software or similar approved. All element the drainage system should be included in the model, with an explanation provided for any assumptions made in the modelling. The model results should be provided for critical storm durations of each elemen the system, and should demonstrate that all the criteria above are met and that there is no surcharging o the system for the QBAR rainfall, no flooding of the surface of the site for the 3.3% (1in30) rainfall, and flooding only in safe areas for the 1% (1in100) plus climate change. b) For the calculations above, we request that the applicant utilises more up to date FEH rainfall dataset rather than usage of FSR rainfall method. c) Any overland flows as generated by the scheme will need to be directed to follow the path that overla flows currently follow. A diagrammatic indication of these routes on plan demonstrating that these flow paths would not pose a risk to properties and vulnerable development. d) The development shall not be occupied until the Sustainable Drainage Scheme for the site has been completed in accordance with the approved details and thereafter retained. Reason : To endure that the principles of Sustainable Drainage are incorporated into this proposal and maintained thereafter.	Noted. Conditions added.

	Management and Maintenance condition Prior to occupation of the development hereby approved, a detailed management maintenance plan for t lifetime of the development, which shall include arrangements for adoption by an appropriate public body or statutory undertaker, management by Residents management company or other arrangements to secure the operation of the drainage scheme throughout the lifetime of the development. The Managem Maintenance Schedule shall be constructed in accordance with the approved details and thereafter retained. Reason: To prevent increased risk of flooding to improve water quality and amenity to ensure future maintenance of the surface water drainage system	
Thames Water	Waste Comments Thames Water would advise that with regard to WASTE WATER NETWORK and SEWAGE TREATME WORKS infrastructure capacity, we would not have any objection to the above planning application, bas on the information provided. There are public sewers crossing or close to your development. If you're planning significant work near o sewers, it's important that you minimize the risk of damage. We'll need to check that your development doesn't limit repair or maintenance activities, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes With regard to SURFACE WATER drainage, Thames Water would advise that if the developer follows th sequential approach to the disposal of surface water we would have no objection. Management of surfac water from new developments should follow Policy SI 13 Sustainable drainage of the London Plan 2021 Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. Should you require further information please refer to our website. https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes Thames Water would recommend that petrol / oil interceptors be fitted in all car parking/washing/repair facilities. Failure to enforce the effective use of petrol / oil interceptors could result in oil-polluted discharg entering local watercourses. Water Comments The applicant is advised that their development boundary falls within a Source Protection Zone for groundwater abstraction. These zones may be at particular risk from polluting activities on or below the land surface. To prevent pollution, the Environment Agency and Thames Water (or other local water undertaker) will use a tiered, risk-based approach to regulate activities that may impact groundwater resources. The applicant is encouraged to read the Environment Agency's approach to groundwater protection (available at https://www.gov.uk/government/publications/groundwater-protection-position-statements) and may wish to discuss the implication for their development with a suitably qualified environmental consultant. On the basis of information provided, Thames Water would advise that with regard to water network and water treatment infrastructure capacity, we would not have any objection to the above planning applicati Thames Water recommends the following informative be attached to this planning permission. Thames	

	Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rat of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account this minimum pressure in the design of the proposed development. If you are planning on using mains water for construction purposes, it's important you let Thames Water know before you start using it, to avoid potential fines for improper usage. More information and how to apply can be found online at thameswater.co.uk/buildingwater.	
LBH Carbon Management Team (Pollution)	Thanks for contacting the Carbon Management Team (Pollution) regarding the above planning applicatio for the demolition of existing laundry building and 1970s infill building; alterations and extensions to 44 existing almshouses to create 8 x 1 bed, 12 x 2 bed and 6 x 3 bed units; alterations to existing Gatehous to provide 1 x 2 bed unit; construction of 1 x new build 3 bed almshouse to replace 1970s infill building; construction of a new apartment building comprising 7 x studio units and 9 x 1 bed units; construction of x new build 2 bed units within two new pavilions (2 units in each pavilion, 4 units in total); with landscaping improvements to access; car parking; and ancillary development thereto and I will like to comment as follows. Having considered all the relevant supportive information especially the Air Quality Assessment Report with reference J10/12246A/10/1/F3 prepared by Air Quality Consultants Ltd dated August 2022 taken note of sections 4 (Assessment Approach), 5 (Baseline Conditions), 6 (Construction Phase Impact Assessment) (Operational Phase Impact Assessment), 8 (Air Quality Neutral), 9 (Mitigation) and 11 (Conclusions) with the proposed installation of low-NOx gas boiler and Air Source Heat Pumps as well as the Phase I Contaminated Land Assessment with reference 73492.00.01R3 prepared by Geo-Smart Information Ltd dated Septem 2022 taken note of sub-sections 2.2 (Potential Sources of Contamination) with quite a few numbers of active and inactive industrial land uses within 51 – 250m of the site, 2.6 (Preliminary Risk Assessment) with moderate/low risk and 2.7 (Next Steps), please be advise that we have no objection to the proposed development in respect to air quality and land contamination but the following planning conditions and informative are recommend should planning permission be granted. 1. Land Contamination Before development commences other than for investigative work: a. Using the information already submitted in the Phase I Contaminated Land Assessment with reference 73492.00.01R3 prepared by Geo-Smart Information Ltd dated September 2022, chemical analyses on samples of the near surface soil in order to determine whether any contaminants are present and to provide an assessment of classification for waste disposal purposes shall be conducted. The site investigation must be comprehensive enough to enable; a risk assessment to be undertaken, refinement of the Conceptual Model, and the development of a Method Statement detailing any additional remediation requirements where necessary. b. The risk assessment and refined Conceptual Model shall be submitted, along with the site investigation report, to the Local Planning Authority which shall be submitted to, and approved in writing by, the Local Planning Authority prior to that remediation being carried out on site. c. Where remediation of contamination on the site is required, completion of the remediation detailed in the method statement shall be carried out and; d. A report that provides verification that the required works have been carried out, shall be submitted to, and approved in writing by the Local Planning Authority before the development is occupied. Reason: To ensure the development can be implemented and occupied with adequate regard for environmental and public safety. 2. Unexpected Contamination 2	

	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 carrie 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 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 developme site in line with paragraph 109 of the National Planning Policy Framework. 3. NRMM a. No works shall commence on the site until all plant and machinery to be used at the demolition and construction phases have been submitted to, and approved in writing by, the Local Planning Authority. Evidence is required to meet Stage IIIB of EU Directive 97/68/ EC for both NOx and PM. No works shall be carried out on site until all Non-Road Mobile Machinery (NRMM) and plant to be used on the site of net power between 37kW and 560 kW has been registered at http://nrmm.london/. Proof of registration must be submitted to the Local Planning Authority prior to the commencement of any works on site. b. An inventory of all NRMM must be kept on site during the course of the demolitions, site preparation and construction phases. All machinery should be regularly serviced and service logs kept on site for inspection. Records should be kept on site which details proof of emission limits for all equipment. This documentation should be made available to local authority officers as required until development completion. Reason: To protect local air quality and comply with Policy 7.14 of the London Plan and the GLA NRMM LEZ 4. Demolition/Construction Environmental Management Plans a. Demolition works shall not commence within the development until a Demolition Environmental Management Plan (DEMP) has been submitted to and approved in writing by the local planning authority whilst b. Development shall not commence (other than demolition) until a Construction Environmental Management Plan (CEMP) has been submitted to and approved in writing by the local planning authority. The following applies to both Parts a and b above: a) The DEMP/CEMP shall include a Construction Logistics Plan (CLP) and Air Quality and Dust Management Plan (AQDMP). b) The DEMP/CEMP shall provide details of how demolition/construction works are to be undertaken respectively and shall include: i. A construction method statement which identifies the stages and details how works will be undertaken ii. Details of working hours, which unless otherwise agreed with the Local Planning Authority shall be limited to 08.00 to 18.00 Monday to Friday and 08.00 to 13.00 on Saturdays; iii. Details of plant and machinery to be used during demolition/construction works; iv. Details of an Unexploded Ordnance Survey; v. Details of the waste management strategy; vi. Details of community engagement arrangements; vii. Details of any acoustic hoarding; viii. A temporary drainage strategy and performance specification to control surface water runoff and Pollution Prevention Plan (in accordance with Environment Agency guidance); ix. Details of external lighting; and, x. Details of any other standard environmental management and control measures to be implemented. c) The CLP will be in accordance with Transport for London's Construction Logistics Plan Guidance (Jul 2017) and shall provide details on: i. Monitoring and joint working arrangements, where appropriate; ii. Site access and car parking arrangements; iii. Delivery booking systems; 3	

	iv. Agreed routes to/from the Plot; v. Timing of deliveries to and removals from the Plot (to avoid peak times, as agreed with Highways Authority, 07.00 to 9.00 and 16.00 to 18.00, where possible); and vi. Travel plans for staff/personnel involved in demolition/construction works to detail the measures to encourage sustainable travel to the Plot during the demolition/construction phase; and vii. Joint arrangements with neighbouring developers for staff parking, Lorry Parking and consolidation o facilities such as concrete batching. d) The AQDMP will be in accordance with the Greater London Authority SPG Dust and Emissions Contr (2014) and shall include: i. Mitigation measures to manage and minimise demolition/construction dust emissions during works; ii. Details confirming the Plot has been registered at http://nrmm.london; iii. Evidence of Non-Road Mobile Machinery (NRMM) and plant registration shall be available on site in t event of Local Authority Inspection; iv. An inventory of NRMM currently on site (machinery should be regularly serviced, and service logs ke on site, which includes proof of emission limits for equipment for inspection); v. A Dust Risk Assessment for the works; and vi. Lorry Parking, in joint arrangement where appropriate. The development shall be carried out in accordance with the approved details. Additionally, the site or Contractor Company must be registered with the Considerate Constructors Scheme. Proof of registration must be sent to the Local Planning Authority prior to any works being carried out. Reason: To safeguard residential amenity, reduce congestion and mitigate obstruction to the flow of traf protect air quality and the amenity of the locality." 5. Combustion and Energy Plant Prior to installation, details of the gas boilers to be provided for space heating and domestic hot water should be forwarded to the Local Planning Authority. The boilers to be provided for space heating and domestic hot water shall have dry NOx emissions not exceeding 30 mg/kWh (0%). Reason: As required by The London Plan Policy 7.14. Informative: 1. Prior to demolition or any construction work of the existing buildings, an asbestos survey should be carried out to identify the location and type of asbestos containing materials. Any asbestos containing materials must be removed and disposed of in accordance with the correct procedure prior to any demolition or construction works carried out. I hope the above clarify our position on the application? Otherwise, feel free to contact us should you ha any further query in respect of the application quoting M3 reference number WK/554735	
LBH Waste	I've looked at the details of this planning application for the development of Edmansons Close, Bruce Grove, London, N17 6XD. From the information provided in the Design and Access statement there is reference to storage for all th waste streams Haringey collects. All properties should have separate containers for mixed dry recycling, food waste, refuse and garden waste if appropriate and the numbers and types of bins should meet the guidance attached for ease of reference. It is noted that carry distances for collection crews and residents are compliant with the guidance and tha vehicles can access as is currently the case. I would be happy to provide additional comments if more details are provided or if there is anything else should be aware of concerning this application.	Noted. Conditions added.
LBH Arboricuture	I can confirm that I am satisfied with the Landscape plan. • There is an overall net gain with 15 trees being removed and 23 new trees to be planted	Noted. Conditions added.

	• The Holm Oak, Oak and Lime will establish larger crowns meaning a canopy and timber gain • The current Cherry Kanzans are declining and come to the end of their lifespans • Good species diversity and urban fitness trees have been selected. This reduces monoculture planting and the risk of future pest & disease and threats from climate change. There is all year-round arboricultural interest • The new trees will have the space to grow in a non-static environment and will eventually be in scale to their surroundings adding to the landscape and streetscape The trees are heavy standards for instant impact. We will require a condition for a three to five-year aftercare program, and replacement for any loss of trees. NO DEVELOPMENT SHALL TAKE PLACE UNTIL a schedule of landscape maintenance for a period of five years has been submitted to and approved in writing by the Local Planning Authority. The schedule shall include details of the arrangements for its implementation. Development shall be carried out in accordance with the approved schedule.	
Ecology	Comments on the Bat Emergence Survey and Mitigation Report and the Preliminary Ecological Appraisa (PEA) for HGY/2022/4319. In summary, the proposed redevelopment at this site will have a minimal impact on ecology and particula bats, if all the recommendations set out in the reports are adhered to. <u>Bat Emergence Survey and Mitigation Report</u> Surveys including potential roost assessments, ground level tree assessments and emergence surveys bats were completed in July and August 2025. Therse update surveys completed between 2020 and 202 by CSA Environmental, which recorded a confirmed roost in the northern end of the main block of almshouses. The new surveys have recorded a very similar bat use and roosting on the site, with very lit change from previous assessments. The on-site buildings were assessed externally and internally, where appropriate, to assess their potenti to support roosting bats. In common with the 2022 assessment the sheds and outbuilding had negligible roosting potential, the almshouses had low to moderate potential, and the chapel had low potential. Four the trees on the site have potential roosting features for individual bats. These trees will be retained post development. The bat emergence survey recorded a single emergence of a common pipistrelle bat from the base of a chimney on an almshouse near the chapel. This is classed as an opportunistic day roost. The bat survey completed in 2022 recorded emergences from a different feature on the same building. The overall bat activity on the site was low. Most of the calls recorded on the site were associated with a low number of foraging bats. The roosts identified in 2022 and 2025 will not be impacted by the proposed works for this development and any potential disturbance can be mitigated for by following a Precautionary Methods Working Statement (PWMS), using the NE Disturbance procedure. Broadly the PWMS will cover the timing of works and sof stripping techniques of the roof with an ecological clerk of works supervision. All the recommendations set out in Sec 6.0 of the Bat Emergence Survey and Mitigation Report must be adhered to prior to and during the whole construction process. <u>Preliminary Ecological Appraisal (PEA)</u>	Noted.

	The PEA report presents results on surveys undertaken on 2 and 3 July 2025. This updates the PEA previously undertaken by CSA Environmental in December 2019. The outcomes of the current assessm are very similar to those of previous assessments and there has been a negligible degree of change in habitats present. No new ecological constraints have been recorded. The site primarily consists of terraced almshouses, a chapel and laundry building backing onto vegetate garden. An orchard with mature Cherry trees exists in front of the almshouses. The site boundary with Bruce Grove consists of lines of Lime pollards. To the east of the site there is bramble scrub, modified grassland, a line of Leylandii trees, and a non-native hedgerow. The proposed development is for renovations to most of the existing buildings and with demolition of one 1970s-built fill in block, construction of residential properties, landscaping, and ancillary development. Th development will have no impact on statutory or non-statutory sites nearby. Most of the on-site habitats w be retained and unaffected by the proposals with landscaping adding value to the site post development Overall, the site is considered to have low-moderate ecological value with suitable habitats for species including hedgehog, nesting birds, and invertebrates. Root protection areas must be put in place for the trees that will be retained. Risk to hedgehog and nesting birds can be mitigated by implementation of standard best practice measures during vegetation or ground material clearance. If the removal of an on site fox earth is necessary to facilitate development, appropriate measures must be taken to ensure any animals present are displaced humanely. The inactive den should only be destroyed once it is confirmed be unoccupied.	
Local Resident Objections	Object to the building proposals of the demolition of these buildings and the proposals to renovate them. **Principle** - do not agree that buildings should be changed from almshouses. They should remain with the same purpose and not be used for profit. Suggest a planning condition to retain for social housing. **Potential for Overlooking and Overshadowing** **Disturbance** - unacceptable intrusion in the form of noise nuisance, general disturbance, odour, etc. - the road is already busy. **Overbearing** - The scale of the works means that the property/premises has an oppressive impact on surrounding areas/houses. **Out-of-character** - current almshouses are beautiful to look at and proposals would damage the nature of the area. They should be held to the same standards. Apartment building is a mis-match. **Road Safety** - The development may lead to a significant impact upon road safety. Increase in traffic. **Cycle parking -** Lack of cycle parking details. **Loss of historic windows** **Mix of dwellings and design detail** - Would be good to see more 3 bed properties and drawings lack detail/visual interest. **Landscaping -** More opportunities for planting and enhancements should be made.	**Principle** – The almshouses have now fallen vacant due to their constrained design and inability to meet modern day standards and health and safety requirements. They are not social housing but have been operated by the Drapers' Almshouse Charity strictly in accordance with its charitable objectives. This means that residents have previously been selected based on being a resident in or having a connection to the local borough; being in need; and capable of independent living. No age restriction is applied to this, albeit it is noted that a number of the previous residents at Edmansons Close had been there for many years and were elderly. The Charity can choose to amend the above criteria at any time as it sees fit as long as it meets its charitable objectives. The proposals aim to retain the historic appearance of the almshouses making sensitive and restorative changes but to provide accommodation which is fit for modern day standards. The Viability Assessment submitted with the proposals and subsequent updates continue to show that the proposals remain unviable but the Drapers remains committed to bringing this site forward to deliver much needed housing rather than see it remain vacant. If any future profit were to be made then the Drapers Charity is required to re-invest this into its charitable purposes. The Council is to seek a review mechanism prior to commencement of works to this effect. **Potential for overlooking and overshadowing** - A comprehensive Daylight & Sunlight report by Hodkinson Consultancy was submitted with the application to assess the impact on light levels into the surrounding properties. It concludes that the

		proposed development will not significantly impact the levels of daylight or sunlight within the existing neighbouring buildings. **Disturbance –** Any impacts from Construction will be sensitively managed via submission of a detailed Construction Management Plan which will be a condition of any future planning permission, requiring approval from the local planning authority. **Overbearing –** The design of the proposals has been carefully designed to ensure that the pavilions, new almshouse and new extensions are modest and lower than the existing almshouses. The apartment building is stepped at two storeys closest to the almhouses and only three storeys further away. The scale and heights of the extensions and proposed new build elements are modest so that they do not adversely impact the almshouses or surrounding properties and no higher or overbearing than existing surrounding properties. The impact of this has been assessed in terms of Daylight & Sunlight as mentioned above which concludes there is no significant impact. The design team has also ensured that none of the new developments are visible from the front green/ area of open space. **Out of Character –** The design proposals are the result of many years of ongoing discussions with Haringey's planning and conservation officers. The proposals have also been independently reviewed by Haringey's Quality Review Panel on two separate occasions. The proposals have been informed by a detailed understanding of the listed buildings on the site and seek to better reveal significance through careful refurbishment. As a result of this approach, the proposals will, as a minimum, preserve the significance of the listed buildings and have the opportunity to better reveal significance through a carefully managed series of works which enhance significance. **Road safety –** The proposals have been revised during the course of the application to provide only 5 disabled car spaces in line with London Plan standards. This will mean that there will be much fewer vehicle movements than the previous existing situation. Any construction traffic will be sensitively managed through submission of a detailed Construction Management Plan which will be a condition of any future planning permission and require approval from the local planning authority. **Cycle Parking –** Cycle parking is to be provided within the gardens of each of the almshouses. Visitor cycle parking is to be provided via secure storage shelters – details and location to be agreed via planning condition with the Council. Cycle parking for the apartment building is to be provided within a separate sheltered secure cycle store as shown on the proposed ground floor plan. All cycle parking will be provided in accordance with London Plan standards. **Loss of historic windows –** The existing windows are generally considered to be in a reasonable condition but require redecoration and localised repair. We note that

		suggestions have been raised over the replacement of windows to improve the sustainability of the almshouses by the carbon management team but we consider that such an approach would involve the unnecessary loss of fabric. The existing timber sash windows will be repaired and repainted in a heritage colour, with secondary glazing installed behind to improve the environmental performance of the buildings. **Mix of dwellings and design detail –** The site puts forward a mix which has been derived having regard to local and borough wide objectives as well as site and development specific circumstances. This is in line with Local Plan policy DM11 and provides a much more suitable mix than the current mix on site which is limited to mainly studios, with some 1 bed and two bed units. Further design detail has been developed during the course of the application, following discussions with officers. Revised plans have been submitted accordingly which provide further detail where deemed necessary. Final details of materials will be subject to approval with the Council through planning condition. **Landscaping –** A detailed Landscape Management Plan was submitted with the planning application. Full details of both hard and soft landscaping will be subject to approval by the Council through detailed planning condition to ensure the proposed landscaping fully integrates with the site's heritage and maximises landscaping opportunities.