

APPENDIX 2 CONSULTATION RESPONSES FROM INTERNAL CONSULTEES/LOCAL RESIDENTS

Stakeholder internal	Comments	Responses
<p>Transportation</p>	<p>This major application, HGY/2025/3156 – 2 to 240 Block, Tiverton Road, Tottenham is for the development of the site to provide 17 new residential council homes arranged across two 4-storey blocks; together with associated communal amenity space, private outdoor space, landscaping, cycle parking and refuse storage.</p> <p>The site is in a PTAL 2 (low public transport accessibility) and is located within Green Lanes B CPZ (Monday-Friday: 8am-6:30pm). The Site is bound by Tiverton Road.</p> <p>Location and access</p> <p>The site is served by six different bus routes, accessed from bus stops on the A503 Seven Sisters Road, the A107 Amhurst Park, and the B152 St Ann’s Road to the east, south, and north of the site respectively. Stamford Hill train station is located around 960-metres from the site. Stamford Hill train station provides access to London Overground services on the Weaver line. The site’s public transport accessibility level (PTAL) is 2. Tiverton Road is subject to a 20mph speed restriction. Cycleway 1 (C1) which links Tottenham to the City of London can be accessed from Amhurst Park to the east of the site.</p> <p>The applicant is proposing a secure gated access to the close (the public realm area) in evenings. Details of how this will operate will need to be provided.</p> <p>Unit mix proposed</p> <p>The development is to be comprised of 2 blocks of 4 storeys, comprising of:</p> <p>Block A:</p> <ul style="list-style-type: none"> 3x1 bedroom/two-person flats. 5x2 bedroom flats. 1x3 bedroom flat. 1x4bedroom flat. <p>Block B:</p> <ul style="list-style-type: none"> 3x2 bedroom flats. 3x3 bedroom flats 1x4 bedroom flat. <p>The issues considered a part of our review of this planning application included: trip generation, impact of the trips on the public transport network (bus, rail and underground), walking routes (footway widths accessibility and accidents), an increase in cycling numbers an impact on the network, impact upon residential parking in the site vicinity, impact of the proposal on the highways network and the impact on the network resulting from construction/demolition traffic during the construction phase of the development proposal.</p> <p>The trip generation assumed for the AM (08:00-09:00) and PM (16:00-17:00) peak combined is 25 trips, with the majority of trips (18/25) being made by public transport. Table 5 of the Transport Assessment</p>	<p>Support noted conditions & planning obligations attached.</p>

contains errors in the trip generation analysis since the PM peak should be 17:00-18:00. Additionally, the dominant residential trip generation is underground which is not reflective of the site's geographic location in that it being distant from an underground station (Manor House - Piccadilly Line) and closer to local bus stops and London Overground stations at Stamford Hill and Harringay Green Lanes.

Transport impact - trip generation and the Transport Assessment

The applicant has provided a TRICs trip generation assessment in the Transport Assessment concerning residential multimodal trip generation for the 17 residential units, servicing and delivery trip generation for the 17 units and within this allocation vehicular trip generation associated with the 2 residential units which afford access to the residents disabled/mobility impaired persons parking bays.

No pre-existing trip generation has been provided for the wider estate to show the incremental impact of this development has been provided. This is of particular interest given the high parking stress on the site. The submitted assessment of trip generation together with travel to work mode shares is not considered robust for the following reasons:

1. The PM Peak is cited as 15:00-16:00, this should be 17:00-18:00.

2. Table 5: TRICs Residential Trip Generation Projections by Mode, excludes the car mode share.

This has been overlooked inappropriately on the basis of the proposal being a 'car free' development.

There are likely to be some residential car trips associated with the site, e.g. people being picked up/dropped off. Since the site is not in a PTAL 4 and above London Plan policy dictates that a site can't be enforced as car-free. Similarly Policy DM32 does not support car-free at this location.

3. The selected TRICs data sites are not comparable in terms of size of development to Tiverton Road.

4. The selected TRICs data sites are not comparable in terms of Public Transport Accessibility Levels (PTAL). The site is a PTAL 2 and the TRICs sites are 3 to 5.

5. The selected TRICs data sites offer no details concerning parking provision on-site or parking controls on adjacent highways or whether these sites are designated 'car-free'.

For the proposed residential use of the site (17 units), the majority of peak hour trips are forecast to be by public transport (10/15) – AM peak and PM Peak (8/10). Cycling and walking make up a large proportion of the remainder of modal share. The daily total for the site forecasts 129 trips (07:00-21:00) with the largest mode shares being 39 trips by underground, 32 by bus, 24 by cycle, 16 on foot and 12 by train.

This mode share trip generation is somewhat flawed in that it fails to recognise that the nearest underground station is Manor House (Picadilly Line) is 1.2km from the site, compared to nearby bus stops and Overground stations at Stamford Hill and Harringay Green Lanes. The mode share for underground trips needs to be re-apportioned to reflect the low PTAL (2) and closer proximity of the site to bus stops and London Overground stations.

Car parking

2021 London Plan Policy T6: Car Parking, requires new residential and non-residential developments to be car-free when in a PTAL 4-6b. Despite this, the applicant in s1.11 of the submitted Transport Assessment has stated the following "The 17 new residential dwellings will be 'car-free'. Future occupiers of the planned new dwellings will be ineligible to apply for a permit to park on the Tiverton Estate or in the

adjacent CPZ 'GL B'. This will be secured through a planning condition/Unilateral Undertaking Agreement and will also be a clause in the lease agreements.”

Even though the site is not in a PTAL 4-6b area, the 2021 London Plan specifically states that for new development car-free development should be the starting point for all development proposals:

“Car-free development should be the starting point for all development proposals in places that are (or are planned to be) well-connected by public transport, with developments elsewhere designed to provide the minimum necessary parking ('car-lite'). Car-free development has no general parking but should still provide disabled persons parking in line with Part E of this policy.”

To reinforce this commitment the applicant will be required to enter into a s106 agreement making the site car-free and prohibiting residents from applying for residential parking permits. Appropriate enforcement will be required to ensure this is adhered to, beyond simply making it a requirement of the leaseholder agreement for each of the new flats. The only exception to this will be for blue badge holders.

The applicant has undertaken a parking stress survey to Lambeth Methodology (30/04/25-01/05/25) which revealed a parking stress of 89% which saw 168 of the 189 kerbside CPZ parking opportunities occupied, including the full occupancy of the 3 disabled Tiverton Road estate residents only parking bays. Additionally, 11 vehicles were observed parked illegally. The results of the parking survey highlight a parking stress issue and potentially a wider issue of enforcement of managing the 39 Tiverton Estate residents only permit parking bays to ensure that only residents park there.

Two new disabled bays on Tiverton Road will be delivered because of the stopping-up of an existing dropped kerb crossover which currently provides access to three echelon parking bays within the site boundary. It is unclear if they will be dedicated to the 17 new dwellings and how this will be enforced.

The pre-existing site has been noted with high parking stress and issues with illegal parking. From the presented parking stress survey it is clear that the site's residents are highly dependant upon parking due to the relatively poor public transport offering (PTAL 2). In order to uphold the car-free nature and prohibition of new residents of the new dwellings (which is a departure from London Plan and DM policies) from applying for residential parking permits, regular monitoring of parking stress (to Lambeth methodology and to be agreed with the council) should be undertaken on the estate.

Cycle parking

The applicant is proposing (according to the Transport Assessment) 33 long-stay and 2 short-stay cycle parking spaces across Blocks A and B which is policy compliant (from a quantum perspective) with 2021 London Plan cycle parking standards, as per Policy T5 Cycling for this type of development which consists of:

Block A:

- 3x1 bedroom/two-person flats.
- 5x2 bedroom flats.
- 1x3 bedroom flat.
- 1x4bedroom flat.

Block B:

- 3x2 bedroom flats.

3x3 bedroom flats

1x4 bedroom flat.

Block A will be provided with 19 long-stay spaces consisting of 9 two-tier spaces over nine Sheffield stand spaces and one enlarged accessibility cycle parking space.

Block B will be equipped with seven two-tier spaces over seven Sheffield stand spaces.

A single Sheffield stand suitable for two bicycles will be provided for short-stay visitors to the dwellings.

However, closer examination of the proposed ground floor plan submitted (drawing no. P-00-D-003 – Rev S shows Block A being equipped with 20 BDS Value two-tier racks and 1 accessible/disabled cycle parking space giving a total of 21 long-stay cycle parking spaces.

Block B is equipped with 14 BDS Value two-tier racks. According to this plan, 35 long-stay cycle parking spaces are to be provided. This is inconsistent with the Transport Assessment which states a provision of 33 long-stay cycle parking spaces.

The use of two-tiered cycle parking is unsuitable for all users, in that it does not promote ease of access.

It also fails to comply with London Cycle Design Standards minimum aisle width requirement of 2.5m beyond the lowered-upper stand. The applicant is required to submit revised long-stay cycle parking provision proposals which afford ease of access and are LCDS and London Plan compliant.

On the proposed site plan, Block B cycle store, has an area dedicated to prams. Some indication should be given as to the capacity of this facility and the availability of this to residents in Block A.

Highways works

The applicant has committed in its Transport Assessment to rationalise the number of vehicular access points to/from the Tiverton Estate adjacent to the open space to the front of 24-96 Tiverton Road. This will see the pre-existing three access points reduced to two access points. The northern and southern accesses will be retained but the middle access point closed as a highway safety benefit from the scheme. The closure of the redundant vehicle access point will see the reinstatement of the kerb and footpath on Tiverton Road at this location. This will facilitate the provision of two additional kerb side disabled parking bays.

The applicant will be required to enter into a s278 agreement to secure this work. This is in addition to s.278 obligations to make good any damage to the highway and footways abounding the site incurred as a result construction works and agreed s.278 minor highways works enhancements to support active travel around the site perimeter.

Servicing and Delivery Management Plan

The applicant has not provided a standalone Servicing and Delivery Management Plan to mitigate the impact of servicing and delivery associated with the site. Servicing and delivery analysis has been undertaken as part of the Transport Assessment. It has provided an Operational Waste Management Plan in which it has outlined refuse collection arrangements.

A dedicated Servicing and Delivery Management Plan should be provided and secured by way of pre-commencement condition.

According to the Transport Assessment, the servicing and delivery strategy for the development site encompasses the following:

Refuse collection arrangements for the 17 new dwellings (including the re-provided existing bin store) will be accommodated from the internal estate road as per the existing established arrangements for the existing properties within this part of the Tiverton Estate. A LB Haringey refuse collection vehicle (RCV) enters, turns, and exits Tiverton Estate via Tiverton Road in a forward gear. Delivery vehicles will be accommodated from the internal estate road as per the existing arrangements for the neighbouring residential properties.

Servicing and delivery trip generation for the 17 dwellings forecasts 4 delivery trips (2 arrivals and departures) per day. It is also noted by the applicant that the incremental increase in deliveries to the estate will not be additional activity as such, since major delivery providers seek to consolidate deliveries. Although this is desirable, there is no guarantee to say this will occur in relation to this development, since e.g. with supermarket deliveries will deliver when a customer requires a delivery.

The servicing and delivery vehicles are proposed to be accommodated using existing internal roads that service existing residential blocks. However, the vehicular swept paths indicate that two-way traffic flows may be obstructed/constrained.

To promote ease of access for all vehicles navigating the internal access road serving the pre-existing site, re-arranged car park and waste collection point, a one-way system is required whereby vehicles and servicing and delivery vehicles enter from Tiverton Road by Block B and exit via Block A. This is to ensure that conflict between vehicles is mitigated. Appropriate signage and a 5mph speed limit should be provided. This helps to promote TfL Healthy Streets and Vision Zero concepts.

Site Access and wayfinding (Active Travel Zones)

Within the Applicant's Transport Assessment it has undertaken a TfL Active Travel Assessment of 3 routes to/from the proposed development site. These consist of:

Route 1: North from the site to St Ann's Road following Tiverton Road, Templeton Road and Hermitage Road (490m route).

Route 2: East from the site to Seven Sisters Road via the estate on a pedestrian link to Moreton Road/Flaxbury Road and then via a route from Pulford Road to Seven Sisters Road (230m route).

Route 3: West from the site to Green Lane via Tiverton Road south to Tavistock Road and then via Vale Road and Hermitage Road (1km route).

Additionally, the applicant will need to liaise with TfL and the council to agree on enhancing wayfinding, e.g. provision of a Legible London board near to the site through s.106 funding. It will need to conform to TfL Yellow Book guidance.

Wayfinding to/from the estate in general is very poor, e.g. from Stamford Hill and Haringay Green Lane stations it is very difficult to navigate to the estate.

The applicant in its Transport Assessment has not made any commitment to enhance Active Travel measures to/from the site. It noted in its Active Travel Assessment that generally roads/footways to/from the site on the above-mentioned routes. All junctions provide dropped kerbs but few provide tactile paving. Given the modest development site it would be unrealistic to seek s.106 contributions to provide additional

tactile paving on the 3 routes mentioned. However, a s.278 agreement will be required to be agreed to enhance the remaining 2 vehicular crossing points to the site on Tiverton Road by the provision of tactile paving.

Travel Plan Statement

The applicant has provided a Travel Plan Statement covering the site. The statement provides a commitment to making the site car-free, prohibiting residential parking permits for residents of the new dwellings, provision of 2 new disabled parking bays which meets the requirement of providing 10% of new dwellings with disabled parking and long and short-stay cycle parking meeting council standards. The above mentioned Travel Plan interventions will be secured via appropriately worded planning obligations. The Travel Plan Statement for the proposed development, needs to be seen in the context of the estate, to promote sustainable, active travel. This should adhere to TfL Travel Plan guidance and include (not limited to): promotional information packs, appointment of a travel plan co-ordinator, mode shift targets that are SMART, monitoring (via Modeshift) and initiatives for the whole estate including the new flats. Submission of a detailed Travel Plan including promotional information packs, appointment of travel plan coordinator, mode shift targets, monitoring (via Modeshift) and initiatives for the new flats.

Construction Management Plan

The applicant has not provided a detailed Construction Management Plan. This needs to be secured through a s.106 agreement. This is to ensure that the impact of both the construction and demolition phases is fully mitigated on both the local highway and transport network and the local community.

Recommendation

(a) There are no substantive transport objections to this proposal, subject to the following conditions, S.106 and S.278 obligations being agreed:

Conditions

The following conditions are required to be entered into by the applicant and the council to ensure that the transport impact of the development is mitigated on the highway/transport network and the local community.

1. Servicing and Delivery Management Plan

The applicant is required to provide a Servicing and Delivery Management Plan to ensure that servicing and delivery activity can be undertaken in a safe and effective manner.

No building or use hereby permitted shall be occupied or use commenced until a servicing and delivery management plan has been prepared encompassing all uses at the site. This should be submitted and approved by the Local Planning Authority. The measures shall thereafter be implemented in accordance with the approved servicing and delivery management plan for the lifetime of the development. The servicing and delivery management shall include the following:

- The contact details of a suitably qualified co-ordinator;
- How vehicle arrivals, departures, parking, stopping and waiting will be controlled to minimise any impact on the highway.
- Details of any freight consolidation operation, centre and the servicing and delivery booking and management systems.

- Measures to be implemented to avoid activity in high peak hours (08:00-09:00 and 17:00-18:00).
- Arrangements for accessing/egressing the site in forward gear and avoidance of having to transit roads in reverse gear.
- Trip generation figures for servicing and delivery activity for the additional dwellings on the site, including existing trip generation to understand uplift in such activity.
- Details for the management and implementation of a one-way system on the estate whereby all vehicles access the re-arranged car park and refuse collection point from the vehicular access point adjacent to Block B and exit to Tiverton Road adjacent to Block A. Appropriate signage and a 5mph speed limit will need to be provided.
- Details of the refuse storage facilities on all plans need to show clearly the waste storage capacity.

Reason: To conform with London Plan Policy T7 Deliveries, servicing and construction. To ensure that the development does not prejudice the free flow of traffic or public safety along the adjoining highway and impact the local community,

2. Cycle parking (Long and short-stay residential)

The applicant is required to agree to a condition relating to the provision of long, short-stay cycle parking for both the residential and workspace land uses at the development. This should conform to 2021 London Plan standards and London Cycle Design Standards (LCDS).

The applicant will be required to submit to the Highway Authority plans showing easily accessible (at ground floor level wherever possible); sheltered, weatherproof and secure cycle parking for 33 long-stay residential cycle spaces and 2 short-stay residential spaces for approval. An absolute minimum of 20% long-stay residential cycle parking should be to Sheffield Stand design specification. The design specification and quantum of cycle parking should be clearly annotated on submitted plans. Appropriate provision of bespoke long-stay cycle parking should be provided where appropriate (depending upon the development type) to accommodate mobility impaired persons cycles, cargo bikes and e-bikes. Long-stay cycle parking should be easily accessible from the public highway, minimising transit time through sets of doors etc.

The applicant must demonstrate that London Cycle Design Standards minimum aisle width requirement of 2.5m beyond the lowered upper stand is adhered to when two-tiered cycle parking is proposed.

Short-stay cycle parking provided should be in a central, easily accessible position to Sheffield Stand design specification.

Reason: To ensure that residential use cycle parking is in accordance with the published London Plan 2021 Policy T5, the cycle parking must be in line with the London Cycle Design Standards (LCDS) and to promote active travel.

3. Disabled/accessible parking bays

The applicant has proposed 2 additional disabled/accessible parking bays as a result of blocking up a vehicular access point on Tiverton Road. The applicant will need to agree to a condition to provide the following details:

The applicant will need to outline how these disabled parking permit bays will be managed to ensure that only disabled/mobility impaired residents park in the designated bays. It will need to show on relevant plans the dimensions and ability of a wheelchair user to safely access and egress their vehicle.

Reason: To conform to 2021 London Plan Policy T6 Car Parking. To ensure that appropriate provision of disabled/accessible parking provision is provided for the site and to accommodate future growth.

S.106 agreements

The following S.106 agreements will be required to be entered into by the applicant and the council to help mitigate the transport impact of the development.

1. Car-free development

The owner is required to enter into a Section 106 agreement to ensure that the residential units at the site 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. The only exception to this is for disabled residents at the site. Periodic monitoring of parking stress on the estate should be undertaken (frequency to be agreed with the council) to ensure that the parking stress justification remains valid for not permitting new residents of the new dwellings from applying for residential parking permits. For avoidance of doubt, 89% parking stress is the baseline figure (April/May 2025).

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.

2. Car Parking Management and Enforcement Plan.

The applicant will be required to provide a Car Parking Management and Enforcement Plan which includes but is not limited to:

- a) The applicant will need to show that the proposed additional 2 on-street accessible parking bays will be able to accommodate a wheelchair accessing and egressing their vehicle in a safe manner and the process for managing their use by residents. The accessible parking bays will require EV charging capability, the type of charging should be annotated on plans and agreed by the highways authority.
- b) Monitor the take up of wheelchair accessible parking for the first 5 years of occupation in line with the Travel Plan monitoring, provide wheelchair accessible parking in line with the London Plan as required by residents of the development.
- c) Monitor the enforcement of the car-free nature (which is tied into lease agreements) with residents of the new 17 residential dwellings which is a departure from London Plan policy which does not require car-free development for sites under PTAL 4. The site is a PTAL 2.
- d) Monitor the management of the 39 residential parking permits for pre-existing long standing residents to ensure that no residents of the new 17 units illegally park in the spaces or try and obtain residential estate parking permits.

Reason: To be in accordance with the published London Plan Policy T6.1 Residential Parking and to ensure that the development proposal is car-free and any residual car parking demand generated by the development will not impact on existing residential amenity.

3. Construction Management Plan

The applicant/developer is required to submit a Construction Management Plan, 6 months (six months) prior to the commencement of development, and approved in writing by the local planning authority. The applicant will be required to contribute, by way of a Section 106 agreement, a sum of £15,000 (fifteen thousand pounds) to cover officer time required to administer and oversee the temporary arrangements, and ensure highways impacts are managed to minimise nuisance for other highways users, local residents and businesses.

No development shall take place, including any demolition works, until a full Construction Management Plan has been submitted to and approved in writing by the Local Planning Authority. The approved plan shall be adhered to throughout both the demolition and construction periods. The plan shall provide for the following:

- A construction/demolition programme including length and phasing of works;
- 24 hour emergency contact number;
- Hours of operation;
- Delivery hours (avoiding peak times on traffic sensitive routes (08:00-09:00 and 17:00-18:00) and school pick-up/drop-off times (08:00-09:00 and 15:00-16:00)).
- Expected number and types of vehicles requiring access to the site:
 - o Deliveries, waste, cranes, equipment, plant, works, visitors;
 - o Size of construction vehicles;
 - o The use of consolidation operation/centre or scheme for the delivery of materials and goods.
 - o Phasing of works and how the number of and types of vehicles requiring access to the site may vary.
- Means by which a reduction in the number of movements and parking on nearby streets can be achieved (including measures to ensure satisfactory access and movement for existing occupiers of neighbouring properties during the construction/demolition phases):
 - o Programming;
 - o Waste management including using waste compaction;
 - o Construction/demolition methodology;
 - o Shared deliveries;
 - o Reverse/green logistics strategies to be employed;
 - o Car sharing;
 - o Travel planning;
 - o Local workforce;
 - o Parking facilities for staff and visitors;
 - o On-site facilities;

	<ul style="list-style-type: none"> o A scheme to encourage the use of public transport and active travel. • Routes for construction/demolition traffic avoiding weight and size restrictions to reduce unsuitable traffic on residential roads; • Locations for loading/unloading, waiting/holding areas and means of communication for delivery vehicles if space is unavailable within or near the site; • Mechanisms in place to deal with unexpected/late delivery vehicles to minimise queuing impact and any idling on the highway network; • Locations for storage of plant/waste/construction materials; • Arrangements for the turning of vehicles, to be within the site to ensure access and egress from the site in forward gear (unless absolutely unavoidable and appropriate safeguarding measures for vulnerable highway users are in situ); • Arrangements to receive abnormal loads, unusually large vehicles, the delivery of cranes, portacabins and specialist plant; • Swept path analysis showing access for the largest vehicles expected to regularly access the site and measures to ensure adequate space is available; • Any necessary traffic management measures such as the suspension of parking, loading, one way working, footway and road closures, portable signals, stop & go, lane closures, contraflow, priority working and give & take; • Provision of sufficient advance forewarning to the council and local community of any required parking bay/footway/road closures and indication of the length of suspension; • Measures to protect vulnerable road users (cyclists and pedestrians) such as hoarding; • Measures to protect street furniture such as lighting columns and traffic signs; • Method of preventing mud and construction/demolition debris being carried onto the highway such as wheel washing facilities and ensuring construction/demolition vehicles loads are fully covered and secured when exiting/entering the site; • Membership of the Fleet Operator Recognition Scheme (FORS). • Meets the Construction Logistics and Community Safety (CLOCS) silver standard and demonstrates a commitment to strive to secure gold standard; • Methods of communicating the Construction Management Plan to staff, visitors and neighbouring residents and businesses. <p>The plan shall include a plan which identifies where required:</p> <ul style="list-style-type: none"> • Hoarding lines with access gates (vehicle, pedestrian and cyclists). • Pedestrian, cycle and vehicle routing in to and within the site. • Temporary traffic management measures (including footway and road closures) and traffic marshal/banksman locations. • Locations for the loading/unloading, waiting/holding areas and storage of plant, waste and construction/demolition materials. • Crane and site welfare portacabin locations. 	
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- Parking (vehicle and cycle).
Prior to the installation of traffic management measures on traffic sensitive streets the location, date and time must be agreed by the Highways Authority.
The plan will be required to include a full highway condition survey prior to works commencing to ensure that damage to the footways and highways from the construction and demolition phases is made good (around the site perimeter). Development will not be permitted to occur (including investigation work, demolition, siting of site compound/welfare facilities and demolition) until a survey of the condition of the highway (including footways abutting the development site) has been submitted to and approved in writing by the Local Planning Authority (as part of the full Construction Management Plan). The extent of the area to be surveyed must be agreed by the Highways Authority prior to the survey being undertaken. The survey must consist of:
 - A plan to the scale of 1:1000 showing the location of all defects identified on the highway and footways (including cycle lanes);
 - A written and photographic record of all defects with corresponding location references accompanied by a description of the extent of the assessed area and a record of the date, time and weather conditions of the time of the survey.
 No building or use will be permitted to be occupied or the use commenced until any damage to the highway by any traffic arising from the undertaking of the works at the development has been made good to the satisfaction of the Highway Authority.
Where structure(s) are adjacent to/within 6m of the highway/local authority maintained land the applicant will need to secure the required Technical Approval (TA) from the technical approval authority (TAA). No development shall occur, including (full or partial) demolition works of any existing building (s) or structure(s), until Technical Approval (TA) has been granted by the technical approval authority (TAA) based on submission (s) outlining how any structures within 6 metres of the edge of the highway (and outside of this limit where the failure of any structures would affect the failure of any structures would affect the safety of highway users) will be assessed, excavated, constructed, strengthened or demolished. Technical approval submissions shall be submitted in writing, and TAA approval, if granted, shall be in the form of a signed Design & Check Certificate (D&C) and granted in writing by the Local Planning Authority. As part of the technical approval process a full structural report outlining how the demolition, excavation, design, strengthening and construction of structures will be managed to ensure during works temporary structural support is afforded and permanent support on completion of adjacent highway or locally maintained land where:
 - The proposed location is within 6 metres of the edge of the highway or any local authority maintained and/or;
 - The potential structural failure of any proposed structure(s) (if considered that the depth or extent(s) of the proposal(s) lie within the structural influence of the highway) would potential impact the highway or the safety of road users (particularly vulnerable ones).
 Reason: To be in accordance with London Plan Policy T7 Deliveries, Servicing and Construction. To be in the interests of safe operation of the highway in the lead into development both during the construction

phases of the development. To ensure the safety of vulnerable road users and the local community during the construction and demolition phases. To ensure that any damage to the adopted highway sustained throughout the development process can be identified and subsequently remedied at the expense of the developer. To ensure the works safeguard the structural integrity of the highway and/or local-authority maintained land during the construction phase of the development.

4. Residential Travel Plan

A site-wide residential travel plan must be secured covering new dwellings by a S.106 agreement to help maximise public and active travel modal usage.

No building or use hereby permitted shall be occupied or use commenced until a Residential Travel Plan residents comprising immediate, contingency, and long-term measures to promote and encourage alternatives to single-occupancy car usage, along with the contact details of the current Travel Plan Co-ordinator and a copy of the Travel Information Pack, has been prepared, submitted to, and approved in writing by the Local Planning Authority. The approved Travel Plan shall be implemented, monitored and reviewed in accordance with the agreed Travel Plan targets to the satisfaction of the council. The Travel Plan shall be written in accordance with the sustainable development aims of the London Plan and TfL Travel Plan guidance.

Specific to the residential use at the site, the following measures should 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 interventions annually for a minimum period of 5 years.
- (b) Undertaking of resident travel surveys in years 1,3 and 5 to monitor and track progress of the travel plan in meeting and exceeding targets, with appropriate remedial measures in situ in case of non-compliance.
- (c) Provision of welcome induction packs containing public transport and cycling/walking information to every new resident of the new dwellings, along with a £200 voucher for active travel related equipment purchases.
- (d) The applicant is required to pay a sum of £1,000 per annum for a period of 5 years £5,000 (five thousand pounds) in total for the monitoring of the travel plan.

Reason: To adhere to London Plan Policy T4: Assessing and mitigating transport impacts. To enable the proposed new dwellings) of the site to make an informed judgement about sustainable transport options, as part of measures to mitigate any net increase in trip generation associated with the new development.

5. Pedestrian wayfinding to/from the site

To encourage sustainable and active travel mode travel choices by users of the development and wider estate, the applicant will be required to provide a contribution towards the development and installation of wayfinding signage, we are therefore seeking a contribution of £10,000 (ten thousand pounds).

Reason: To conform to London Plan Policy T2 Healthy Streets. To promote active travel and wayfinding for residents and visitors to/from the site.

S.278 Agreements

	<p>The applicant shall be required to enter into agreement with the Highway Authority under Section 278 of the Highways Act to pay for any necessary highway works, which includes if required, but not limited to, footway improvement works, access to the Highway, measures for street furniture relocation, carriageway markings, and access and visibility safety requirements. This is to be agreed in writing with the Council Highways department. For clarity purposes, this relates to streets/highways abounding the site boundary, i.e. Tiverton Road. Unavoidable works required to be undertaken by Statutory Services will not be included in the Highway Works Estimate or Payment.</p> <p>The applicant has committed in its Transport Assessment to remove the middle vehicular access on Tiverton Road, reinstate the full kerb and provision of 2 disabled parking bays adjacent to the blocked up vehicular access point. The applicant will be required to enter into a s278 agreement to secure this work.</p> <p>The applicant will be required to enter into a s278 agreement to make good any footway/highway damaged during the construction phase. For avoidance of doubt, the highway asset baseline shall be the highway and footways abutting the site contained here within the pre-commencement survey undertaken by the applicant and agreed with LBH as an acceptable baseline.</p> <p>The applicant will be required to submit detailed drawings of the highways works for all elements of the scheme including the details of the footpath, these drawings should be submitted for approval before any development commences on site.</p> <p>Reason: To implement the proposed highways works to facilitate future access to the development Site and to protect the integrity of the highways network.</p>	
<p>Carbon comments</p>	<p>Carbon Management Response 23/12/2025</p> <p>In preparing this consultation response, we have reviewed:</p> <ul style="list-style-type: none"> • Sustainability Strategy prepared by XCO2 (dated November 2025) • Relevant supporting documents. <p>Summary</p> <p>The development achieves a reduction of 78% carbon dioxide emissions on site exceeding the planning energy requirements. This is achieved with highly energy efficient building fabric elements, high-performance glazing, mechanical ventilation with heat recovery, air source heat pumps and 19kWp Solar Photovoltaic Panels for on-site renewable energy generation.</p>	<p>Support noted and conditions attached</p>

The dynamic thermal modelling assessment (CIBSE TM59) confirms compliance for DSY1 2020s heatwave scenario. However, the report recommends external shading as a retrofit measure which goes against the Cooling Hierarchy. Passive measures should be prioritised and be integrated upfront rather than deferred to retrofit. It is therefore requested to include external shading in western and southern facades as a part of the overheating mitigation strategy, and this has been conditioned.

Local Plan Policy SP4 requires all new development to be zero carbon. A carbon offset contribution of £13,110 is therefore required to offset the remaining emissions of 4.6 tCO₂, calculated at £95 per tCO₂ over 30 years.

Planning conditions have been recommended to secure the benefits of the scheme.

Energy Strategy

The overall predicted reduction in CO₂ emissions for the development shows an improvement of approximately 78% in carbon emissions with SAP10.2 carbon factors, from the Baseline development model (which is Part L 2021 compliant). This represents an annual saving of approximately 16.2tonnes of CO₂ from a baseline of 20.8 tCO₂/year.

The calculated unregulated emissions are: 6.6 tCO₂.

<i>Residential (SAP10.2 emission factors)</i>			
	Total regulated emissions (Tonnes CO₂ / year)	CO₂ savings (Tonnes CO₂ / year)	Percentage savings (%)
Part L 2021 baseline	20.8		
Be Lean	17.0	3.8	18%
Be Clean	17.0	0.0	0%
Be Green	4.6	12.4	59%
Cumulative savings	-	16.2	78%
Carbon shortfall to offset (tCO₂)			
Carbon offset contribution	£95 x 30 years x 4.6 tCO ₂ /year = £13,110		
10% management fee	£1,311		

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

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

	Proposed Development	GLA Benchmark
Building type	Residential	Residential
EUI	40.75 kWh/m ² /year	Does not meet GLA benchmark of 35 kWh/m ² /year
SHD	15.7 kWh/m ² /year	Meets GLA benchmark of 15 kWh/m ² /year
Methodology used	Part L1 - SAP 10.2 & none dwellings / Part L1 - SAP 10.2 & none Landlord Circulation	

Energy – Lean

The applicant has proposed a saving of 3.8 tCO₂ in carbon emissions (18%) through improved energy efficiency standards in key elements of the build. This goes beyond the minimum 10% reduction set in London Plan Policy SI2, so this is supported.

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

Floor u-value	0.10 W/m ² K
External wall u-value	0.15 W/m ² K
Roof u-value	0.10 W/m ² K
Door u-value	1.20 W/m ² K
Window u-value	1.20 W/m ² K
G-value	0.40
Air permeability rate	3 m ³ /hm ² @ 50Pa
Ventilation strategy	Mechanical ventilation with heat recovery (MVHR % efficiency; 0. W//s Specific Fan Power) Natural ventilation
Thermal bridging	Accredited Construction Details
Low energy lighting	100%
Heating system (efficiency / emitter)	89%
Thermal mass	Medium

Improvement from the target fabric energy efficiency (TFEE)

12-18% improvement, from 46 to 38 MWh/year

Overheating is dealt with in more detail below.

Energy – Clean

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

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

Energy – Green

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

Proposed Renewable technologies	Type	Specification
Main space heating system and DHW system	Individual Air source heat pumps	Heating min. SCOP: 4.57
Solar PV residential	Peak output	19.1 kWp covering 92 m ² roof area

Energy – Be Seen

London Plan Policy SI2 requests all developments to 'be seen', to monitor, verify and report on energy performance. The GLA requires all major development proposals to report on their modelled and measured operational energy performance. This will improve transparency on energy usage on sites, reduce the performance gap between modelled and measured energy use, and provide the applicant,

building managers and occupants clarity on the performance of the building, equipment and renewable energy technologies.

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

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

Carbon Offset Contribution

A carbon shortfall of 4.6 tCO₂/year remains. The remaining carbon emissions will need to be offset at £95/tCO₂ over 30 years.

Overheating

London Plan Policy S14 requires developments to minimise adverse impacts on the urban heat island, reduce the potential for overheating and reduce reliance on air conditioning systems. Through careful design, layout, orientation, materials and incorporation of green infrastructure, designs must reduce overheating in line with the Cooling Hierarchy.

In accordance with the Energy Assessment Guidance, the applicant has undertaken a dynamic thermal modelling assessment in line with CIBSE TM59 with TM49 weather files. The assessment covered 47 habitable spaces (14 KLD/living rooms and 33 bedrooms) across 14 sample flats (72% representation of dwellings).

Passive measures have been incorporated where feasible, including external shading via balconies, low g-value glazing (0.5), and energy-efficient façades. Natural ventilation results are reported to evidence optimisation of the façade design in line with the Cooling Hierarchy.

The report includes sample dwelling layouts, communal corridor assessment, a retrofit plan for future/extreme weather, and a heatwave user guide. Future scenarios show strong resilience, with compliance for DSY1 2020 and mitigation strategies outlined for DSY2, DSY3, and future climate files (2050 and 2080). Active cooling may be required under extreme scenarios.

Scenario	Compliance	Remarks
Natural Ventilation (DSY1)	100% pass	All spaces pass showing maximised passive design.
Natural Ventilation (DSY1)	Fail	Some bedrooms fail under noise constraints;
MVHR with Tempered Air (DSY1)	100% pass	All rooms comply with TM59 criteria.
MVHR with Tempered Air (DSY2 & DSY3)	Pass	Good performance under short/long heatwaves.
Future DSY1 2050	Partial pass	Retrofit measures (external shutters, higher MVHR airflow) advised.
Future DSY1 2080	Fail	Active cooling required for full compliance.

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

- Natural ventilation with secure inward openable windows
- Glazing g-value: 0.5
- External shading via balconies and window reveals
- MVHR with summer bypass and optional cooling coils (60 l/s airflow)
- No active cooling at planning stage

Proposed future mitigation measures include:

- Internal blinds
- External shutters
- Comfort cooling (retrofit option)

Recommendation: Reliance on MVHR with tempered air remains necessary due to acoustic constraints. To better demonstrate compliance with the Cooling Hierarchy and London Plan Policy SI4, additional passive measures—such as increased external shading and reduced glazing ratios—should be integrated upfront rather than deferred to retrofit. It is therefore requested to include external shading as a part of the overheating mitigation strategy and this has been conditioned.

Planning Obligations Heads of Terms

- Be Seen commitment to uploading energy data
- Energy Plan
- Sustainability Review

- Estimated carbon offset contribution (and associated obligations) of £13,110 (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.

Planning Conditions

Energy Plan

(a) Prior to the commencement of development, an Energy Plan shall be submitted and approved by the Local Planning Authority. This shall be based on the submitted Sustainability Statement prepared by XCO2 (dated November 2025), delivering a minimum site-wide carbon emission reduction of 78% from a Building Regulations 2021 Part L compliant building. Once approved, this will form the Approved Energy Plan for the development.

The revised strategy shall include the following:

- *Confirmation of how this development will meet the zero-carbon policy requirement in line with the Energy Hierarchy including the carbon offset contribution;*
- *A minimum 19.1 kWp solar photovoltaic array and how the energy will be used on-site before exporting to the grid;*
- *A minimum site-wide carbon reduction of 18% under Be Lean with detailed SAP calculations for the residential element of the development;*
- *Calculations showing how thermal bridging will be reduced;*
- *Specification and location of the proposed ASHPs, their seasonal coefficient of performance, seasonal performance factor for heating, seasonal energy efficiency ratio for cooling (non-domestic units only), with plans showing the individual ASHP pipework and layout;*
- *A metering strategy.*

(b) Prior to the occupation of development, evidence that the ASHPs and solar PV panels comply with other relevant issues as outlined in the Microgeneration Certification Scheme or Heat Pump Product Certification Requirements shall be submitted to and approved by the Local Planning Authority.

(c) The solar PV arrays and 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, and an energy generation statement for the period that the solar PV array has been installed.

Should the zero carbon target not be able to be achieved on-site through energy measures, then any shortfall carbon emissions shall be offset at the cost of a rate of £2,850 per tonne of carbon, plus a 10%

management fee. Prior to commencement, the initial carbon offset contribution equivalent to 50% of the calculated carbon offset based on the approved Energy Plan.

The final agreed energy strategy shall be installed and operation prior to the first occupation of the development. The development shall be carried out strictly in accordance with the details so approved and shall be operated and maintained as such thereafter. The solar PV array shall be also installed with monitoring equipment prior to completion and shall be maintained at least annually thereafter.

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) Policy SP4.

Overheating Strategy

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 Overheating Assessment reports on the Sustainability Statement prepared by XCO2 (dated November 2025). This report shall include:

- *Updated modelling of all relevant units in accordance with CIBSE TM59, using CIBSE TM49 London Weather Centre DSY1–3 (2020s) and DSY1 2050s and 2080s high emissions, 50% percentile, for both openable and closed window scenarios.*
- *Demonstration that the mandatory pass for DSY1 2020s can be achieved following the Cooling Hierarchy and in compliance with Building Regulations Part O, including:*
 - o *Natural ventilation scenario (without MVHR tempering) to evidence passive design optimisation (openable windows scenario).*
 - o *Mechanical ventilation scenario with maximised passive measures to reduce reliance on MVHR tempering (closed window scenario).*
- *Modelling of mitigation measures including external shading 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.*
- *A heatwave plan and Home User Guide for occupants.*

(b) Prior to occupation, the development must be built in accordance with the approved overheating measures and retained thereafter for the lifetime of the development:

- Natural ventilation with secure inward openable windows
- Glazing g-value: 0.5
- External shading in West and south facades, such as Brise Soleil or external shutters, etc.
- MVHR with summer bypass and optional cooling coils (60 l/s airflow)
- No active cooling
- Any further mitigation measures as approved by or superseded by the latest approved Overheating Strategy.

If the design of Blocks are amended, or the heat network pipes will result in higher heat losses and will impact on the overheating risk of any units, a revised Overheating Strategy must be submitted as part of the amendment application.

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.

Energy Monitoring: Be Seen

(a) Prior to the completion of the superstructure a detailed scheme for energy monitoring has been submitted to and approved in writing by the Local Planning Authority. This shall include details of suitable automatic meter reading devices for the monitoring of energy use and renewable/low carbon energy generation. The monitoring mechanisms approved in the monitoring strategy shall be made available for use prior to the first occupation of each building.

(b) Within one year of first occupation, evidence shall be submitted to and approved by the Local Planning Authority to demonstrate how the development has performed against the approved Energy Strategy and to demonstrate how occupants have been taken through training on how to use their homes and the technology correctly and in the most energy efficient way and that issues have been dealt with. This should include energy use data for the first year and a brief statement of occupant involvement to evidence this training and engagement.

(c) Upon completion of the first year of Occupation or following the end of the Defects Liability Period (whichever is the later) and at least for the following four years after that date, the Owner is required to provide accurate and verified annual in-use energy performance data for all relevant indicators under each Reportable Unit of the development as per the methodology outlined in the 'In-use stage' chapter / section of the GLA 'Be Seen' energy monitoring guidance document (or any document that may replace it).

All data and supporting evidence should be submitted to the GLA using the 'Be Seen' reporting webform (<https://www.london.gov.uk/what-wedo/planning/implementing-london-plan/london-plan-guidance-and->

	<p><i>spgs/be-seen-energymonitoring-guidance).) If the 'In-use stage' evidence shows that the 'As-built stage' performance estimates have not been or are not being met, the Owner should investigate and identify the causes of underperformance and the potential mitigation measures and set these out in the relevant comment box of the 'Be Seen' in-use stage reporting webform. An action plan comprising measures shall be submitted to and approved in writing by the GLA, identifying measures which would be reasonably practicable to implement and a proposed timescale for implementation. The action plan and measures approved by the GLA should be implemented by the Owner as soon as reasonably practicable.</i></p> <p><i>REASON: To ensure the development can comply with the Energy Hierarchy in line with London Plan 2021 Policy SI 2 and Local Plan Policy SP4 before construction works prohibit compliance.</i></p> <p><u><i>Sustainability Review</i></u> <i>Prior to the occupation of the relevant building, a final assessment should be provided to be approved in writing by the Council which shall include an as built detailed energy assessment of the Development prepared in accordance with London Plan and Council policies which:</i></p> <ul style="list-style-type: none"> <i>a. explains and provides evidence to demonstrate whether or not the Development has been constructed and completed in accordance with the Approved Energy Plan in particular whether the 100% CO2 emission reduction target has been met;</i> <i>b. calculates and explains the amount of the Additional Carbon Offsetting Contribution (if any) at £2,850 per tonne of carbon to be paid by the Owners to the Council where the Development has not been able to achieve zero carbon target on-site. This shall be based on the as-built energy assessment submitted as a part of the Sustainability review;</i> <i>c. provides evidence to support (a) to (c) above including but not limited to photographic evidence, air tightness test certificates and as-built energy performance certificates; and</i> <i>d. such other information reasonably requested by the Council.</i> <p><i>Prior to completion, the Owner shall pay the final carbon offset contribution. This shall be calculated based on the as-built energy performance assessment undertaken at Sustainability Review stage, less the initial carbon offset contribution paid at Energy Plan stage.</i></p> <p><i>Reason: To ensure the development reduces its impact on climate change by reducing carbon emissions on site in compliance with the Energy Hierarchy, and in line with London Plan (2021) Policy SI2, and Local Plan (2017) Policies SP4 and DM22.</i></p>	
<p>Design Comments</p>	<p>Thank you for asking for my comments on the above application, with which I am very familiar, having been involved in the pre application process and the Quality Review Panel (QRP) sessions. Site & Location Context</p>	<p>Support noted and conditions attached.</p>

The application site is an area of open space and access/parking in front of the post war residential blocks at 2–240 Tiverton Road (N15 6RS). It currently comprises grass, small trees, raised beds, pavements, parking and an access road. It is framed by four to five storey residential blocks, estate roads and parking; a modest church and play area sit immediately to the north within further open green space.

The wider context is that the estate of post-war council housing extends for some way to the north-east, but with an abrupt transition to the predominantly industrial “Haringey Warehouse District” a short distance to the west. Its industrial character is subject to residential pressure as well as transition to modern creative industries and the Council has engaged with landowners, residents and the wider community to manage this, embracing the controlled concept of “Warehouse Living”, but this should increase the resident population whilst reducing heavy industrial traffic, including in and around this application site. Seven Sisters Road, with regular busses, local shops and facilities, is a short distance to the south-east.

Planning Policy Context

The principle of delivering new council homes on this underperforming open space—together with public realm and play improvements within and beyond the red line—has been established through the Council’s housing programme and Cabinet approvals, and has been the subject of s105 consultation with estate residents. At a strategic level, the proposals accord with the Council’s ongoing direct delivery of new council homes and associated estate improvements, including a commitment to build at least 3,000 homes at council rents by 2031. The Cabinet report for Tiverton confirms the design approach (including Passivhaus principles) and intention to secure wider public realm benefits as part of this project.

The application site and wider estate is not allocated or subject to any specific policy designations. The site is not within a conservation area; there are no designated heritage assets nearby. Design matters are assessed against adopted development plan policies, including London Plan design quality, inclusivity and sustainable design requirements, and the borough’s DM design policies, including DM1.

Streetscape Character & Pattern of Development

The two block arrangement continues the estate’s orthogonal east–west grain while carving out a new, shared, car free central courtyard. Regularly spaced front doors and windows to ground floor living rooms and kitchens animate and provide passive surveillance to all surrounding streets and spaces.

The proposals also set a coherent “child friendly street” ambition for the shared surface along the estate road, with complementary improvements proposed to the nearby open spaces: the play area by the Faith Baptist Church, the open space in front of 2–24 Tiverton Road, and Tewkesbury Road open space. This responds directly to the QRP’s request for a stronger, more compelling landscape vision beyond the red line. Securing these elements through the planning application package and conditions on the landscape design and landscaping materials supported by the submitted consultation material.

Form, Bulk, Height & Massing

Two 4 storey blocks are proposed. The QRP supported the overall massing, the use of brick, and the scale and articulation of windows, noting the need for a richer and more characterful architectural language. The

application confirms the two block approach and demonstrates (through elevations/visuals and bay studies) how a robust brick vernacular, well proportioned openings and balcony detailing can create a calm, contextual architecture while avoiding pastiche. The modest height and shoulder alignments sit comfortably within the existing four to five storey context.

Elevational Treatment, Fenestration, Balconies, Materials & Detailing

The scheme adopts a brick led architectural language with contemporary detailing. The QRP requested: (i) more legible and welcoming entrances with a clear hierarchy; (ii) lighter, more varied balcony structures—particularly to the courtyard elevations—with improved privacy (not solid) and larger balconies for family units; (iii) opportunities to vary fenestration in response to the spaces they face; and (iv) submission of embedded detail (bay studies, balcony soffits/railings, patterned brickwork).

The submitted design material indicates progress on each of these points and shows a tighter, more legible entrance strategy, refined balcony proportions/railings and clearer differentiation between street and courtyard elevations. These refinements should be locked down via conditions requiring full 1:20/1:5 details of: entrances and gates; balcony structures (including soffits / undersides and privacy treatments); brick and mortar specification and bonds; and windows / reveals.

Residential Quality

Aspect & layout. All homes are dual aspect, with approximately 85% triple aspect according to the architect’s project summary. This is an excellent outcome and directly addresses QRP concerns about day to day experience and outlook. Ground floor homes benefit from front doors and living room / kitchen windows to street / courtyard, along with improved defensible space landscaping, providing exemplary natural surveillance.

Private & communal amenity. Every home has private external amenity (garden, balcony or terrace), and residents share the central communal courtyard (which will also be open to the wider public during daytime, but locked at night), designed for doorstep play, seating and planting. The wider package includes improvements to local open spaces and a shared surface street, with a clear commitment to a “child friendly streets” approach, as the Panel sought.

Cycle & refuse. Dedicated cycle and refuse stores are integrated. The QRP asked that cycle stores be easy to access, located adjacent to the ground floor entrances for upper flats, and (where external) to face the courtyard for security while avoiding overt signage. The submitted plans/management notes indicate stores adjacent to entrances and internal access where possible, meeting this request in full.

Lifts & inclusive access. The absence of lifts at QRP stage was a concern, especially given the proportion of family sized units. The Panel suggested either two lifts (ideal) or one lift focused on one block which could become the family unit-focussed block. The submitted documents explain the inclusive design approach and step free access to all ground floor homes and communal spaces; a clear position on not providing lifts in lower rise blocks such as this is confirmed through the cabinet decision, including enhanced inclusive measures (eg., additional on plot storage for buggies, wider stairs/landings, and re provision options for households where mobility needs change over time).

	<p>Fire Strategy / Deck Access. The QRP supported testing of deck access solutions but requested confirmation that the approach meets fire regulations; any change would have significant design implications. The applicants will separately be required to secure a Gateway style fire statement and confirmation from a competent fire engineer that the proposed access strategy complies (eg., travel distances, protected routes, smoke control, dry risers/hydrants), with any consequential design changes to entrances/cores resolved prior to construction.</p> <p>Landscape & Public Realm</p> <p>Vision & scope. The QRP asked for a stronger vision and child friendly streets across the site, and for the beyond red line improvements to be secured. The submitted package demonstrates: a shared surface street with pedestrian priority; meanders / narrowing and material changes to calm traffic; and a programme of open space improvements at the church play area, Tewkesbury Road and 2–24 Tiverton Road. Public realm works include a new pedestrian crossing and disabled parking provision. These measures address QRP’s ask that pedestrians be prioritised on the shared street. Conditions should secure detailed public realm drawings (materials, kerb free transitions, dropped kerb/raised tables), wayfinding/lighting, and a Delivery & Maintenance Plan with responsibilities and opening hours (where spaces are publicly accessible).</p> <p>Levels & accessibility. The QRP advised a more holistic levels strategy (eg., integrating a gentle gradient across the courtyard to avoid steps/ramps). The application drawings move in this direction; a final coordinated levels plan should be conditioned to demonstrate continuous step free routes, maximum gradients, and threshold/door details.</p> <p>Boundary treatments & defensible space. The Panel sought clarity and quality in railings and boundary treatments, including reducing the 1,500mm courtyard terrace railings and enabling direct courtyard access for ground floor terraces. The scheme now indicates lowered private terrace railings and gated access to the courtyard where appropriate; detailed sections, heights and specifications should be secured by condition.</p> <p>Blue green infrastructure. As the site lies within a Critical Drainage Area, the QRP’s advice to “capture water on site” via rain gardens and re use is particularly relevant. The submission’s SuDS strategy (including rain gardens / permeable surfacing) and irrigation re use proposals are proposed.</p> <p>Daylight & Sunlight</p> <p>Of relevance to this section, Haringey policy in the DM DPD DM1 requires that:</p> <p>“...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:</p> <ol style="list-style-type: none"> 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...” 	
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The applicants have submitted two technical reports: (i) a Daylight, Sunlight & Overshadowing (DSO) assessment of neighbouring properties, and (ii) an Internal Daylight & Sunlight (ItDL) assessment of the proposed homes. Both are prepared in accordance with the Building Research Establishment's publication "Site Layout Planning for Daylight and Sunlight – A Guide to Good Practice" (3rd edition, Littlefair, 2022) (the "BRE Guide"), with internal daylight assessed using the BRE/BS EN 17037 illuminance based approach.

The assessment finds that the day and sunlight received by all neighbouring properties would largely meet the BRE recommended guidance. Across all five blocks, 381 windows and 315 rooms were assessed. 328/381 windows ($\approx 85\%$) meet the BRE VSC target (i.e., either $\geq 27\%$ VSC or $\geq 0.8\times$ existing). Of the 53 not meeting the target, impacts are distributed as follows: 30 windows experience minor loss (20–29.99%), 9 experience moderate loss (30–39.99%), and 14 (NB: the DSO executive summary totals list 29; see detailed tables) are recorded as $>40\%$; these are highly concentrated in 42–240 Tiverton Road (east) and 26–84 Tiverton Road (south) where deep overhangs reduce visible sky. NSL shows 308/315 rooms ($\approx 98\%$) pass, with 7 bedrooms (five in 42–240 and two in 26–84) experiencing minor to moderate losses. Living rooms and LKDs largely pass due to multiple windows and dual aspects. These outcomes indicate localised daylight reductions, mainly to bedrooms beneath overhangs, with primary living spaces generally maintained.

All 153 south facing tested windows across the three western blocks meet APSH and WPSH targets; no south facing windows required testing at the eastern or southern blocks because those elevations are $\geq 90^\circ$ from due south. 32/36 ($\approx 89\%$) assessed garden/amenity areas meet the BRE 21 March test. The four shortfalls lie within the long eastern block (42–240), where existing built form/overhangs limit sky access; the proposed adds some additional shading but the majority of areas continue to meet BRE guidance. In an urban estate context with existing overhangs and closely spaced blocks, these results represent a generally compliant daylight/sunlight performance for neighbours, with limited, localised shortfalls primarily to bedrooms rather than main living spaces, and no sunlight shortfalls. On amenity areas, the substantial majority meet the BRE test. On balance, the neighbour impacts are acceptable and accord with the BRE's urban context caveat when applied sensitively.

The applicant's internal study identifies 59 habitable rooms across 17 dwellings (39 bedrooms, 3 kitchens/dining, 14 LKDs, 3 living rooms) within the proposed development. Daylight was assessed via illuminance targets (BS EN 17037/BRE Appendix C) over $\geq 50\%$ of the reference plane for $\geq 50\%$ daylight hours; targets used were 100 lux (bedrooms), 200 lux (KDs) and 150 lux (LKDs/living rooms). Sunlight exposure to rooms was tested on 21 March with the BRE/BS EN 17037 expectation of ≥ 1.5 hours to at least one habitable room per dwelling (preferably a main living space).

With light coloured finishes (BRE high reflectance assumptions), 58/59 rooms ($\approx 98\%$) meet targets; the only remaining shortfall is the LKD in Block B Flat 1. This demonstrates a clear mitigation pathway via

lighter interior palettes, which can be conditioned for affected rooms. 56/59 rooms (≈95%) meet the sunlight exposure target; all dwellings meet the standard (i.e., ≥1.5 hours in at least one habitable room per dwelling, typically a living space). The three rooms not meeting are north facing: Block A Flat 1 (GF) bedroom, and Block B Flat 1 (GF) LKD and Block B Flat 2 (1F) bedroom; in each case, the dwelling still complies thanks to other rooms.

For a compact, estate infill layout of two 4 storey blocks, the internal performance is strong in both daylight and sunlight terms. The small number of daylight shortfalls (predominantly deep LKDs and north facing ground floor rooms) are minor in extent, have clear mitigations (light finishes; careful internal layout and lighting), and do not prevent every dwelling from achieving a compliant sunlight outcome. On balance, the proposed homes achieve good amenity in line with BRE/BS EN 17037 expectations.

As in the case of other higher density developments, it can be noted that the BRE Guide itself states that it is written with low density, suburban patterns of development in mind and should not be slavishly applied to more urban locations; as in London, the Mayor of London's Housing SPG acknowledges. Therefore, full or near full compliance with the BRE Guide is not to be expected, albeit that a high level of day and sunlight performance, close to the full BRE Guide recommendations, is convincingly predicted to be achieved.

Conclusions

The application takes forward a well considered two block infill that repairs and animates the estate's streets and spaces, provides 17 high quality dual (and largely triple) aspect council homes, and delivers child friendly public realm and open space improvements which broaden the benefits of development beyond the red line. The submitted material demonstrates a positive response to the QRP's recommendations—particularly in landscape vision, pedestrian priority street design, entrance legibility, balcony refinement and embedded detail—while a small number of items should be secured and finalised through robust conditions and/or obligations (notably detailed public realm/levels/blue green infrastructure and the architectural details pack). On this basis, officers support the scheme in design terms, subject to the conditions and obligations outlined above.

Suggested key conditions / obligations

Architectural details & materials: 1:20/1:5 bays, balconies (incl. soffits / undersides, railings, privacy), entrances / gates, window / reveal / brick bonding; on site sample panel including all proposed bricks, mortar and bonding, prior to superstructure.

Landscape & public realm (on and off site): Detailed drawings (materials, kerb free transitions, shared surface geometry, child friendly street features, street furniture/lighting/wayfinding), coordinated levels plan; Delivery & Maintenance Plan; triggers for delivery of off site improvements (church play area, Tewkesbury Road, 2–24 Tiverton Road); blue green infrastructure (SuDS, rain gardens, irrigation re use) with maintenance and samples of hard landscaping materials.

<p>Flood and Water Management</p>	<p>Having reviewed the applicant's recently submitted response letter (reference P25 0335/SB/01, dated 16 December 2025) as prepared by Graphics Structure Consultant, together with our subsequent response email dated 23rd December 2025, we are satisfied with the revised information and the overall methodology outlined in the letter. This is subject to the following planning conditions being secured regarding the Surface Water Drainage Strategy and its management and maintenance plan.</p> <p>Surface Water Drainage condition</p> <p>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:</p> <p>a) Calculations including the Network Diagram cross referencing drainage elements confirming a full range of rainfall data for each return period for 7 days 24 hours provided by Micro drainage modelling or similar simulating storms through the drainage system, with results of critical storms, demonstrating that there is no surcharging of the system for the 1 in 1 year storm, no flooding of the site for 1 in 30 year storm and that any above ground flooding for 1 in 100 year storm is limited to areas designated and safe to flood, away from sensitive infrastructure or buildings. These storms should also include an allowance for climate change.</p> <p>b) For the calculations above, we request that the applicant utilises more up to date FEH rainfall datasets rather than usage of FSR rainfall method.</p> <p>c) Any overland flows as generated by the scheme will need to be directed to follow the path that overland 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.</p> <p>d) An evidence from the Thames Water confirming that the site has an agreed rate and point of discharge.</p> <p>Reason : To endure that the principles of Sustainable Drainage are incorporated into this proposal and maintained thereafter.</p> <p>Management and Maintenance condition</p>	<p>Support noted and conditions attached.</p>

	<p>Prior to occupation of the development hereby approved, a detailed management maintenance plan for the 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 Management Maintenance Schedule shall be constructed in accordance with the approved details and thereafter retained.</p> <p>Reason: To prevent increased risk of flooding to improve water quality and amenity to ensure future maintenance of the surface water drainage system</p>	
<p>Waste Management</p>	<p>Having reviewed the Operational Waste Management Plan (October 2025) submitted for the development at 24–96 Tiverton Road, N15, the proposals for waste storage and collection are considered acceptable. The bin capacities for refuse, recycling and food waste meet the requirements set out in LB Haringey's Waste Management Guidance Note for Residential and Mixed-Use Developments. The location of bin stores within each block provides appropriate accessibility for residents, and drag distances to collection points are within the required 10 metres. Swept path analysis confirms that refuse vehicles can safely access and service the site from the internal estate road without causing obstruction to the public highway. The relocation of the existing estate bin storage area and the integration of new stores for Blocks A and B are acceptable and can be serviced in line with existing arrangements on the Tiverton Estate. No objections are raised, subject to the following condition: Condition – Final Waste Management Plan A detailed Final Operational Waste Management Plan shall be submitted to and approved by the Local Planning Authority prior to first occupation. This must include confirmation of store dimensions, door widths, materials, waste crew access arrangements and ongoing management responsibilities.</p>	<p>Support noted and conditions attached.</p>
<p>Pollutions</p>	<p>Thank you for contacting the Pollution Team regarding the above application for the Development of the site to provide 17 new residential council homes arranged across two 4-storey blocks; together with associated communal amenity space, private outdoor space, landscaping, cycle parking, and refuse storage at 2 to 240 Block, Tiverton Road, Tottenham, London, N15 and I would like to comment as it relates to matters of this service as follows.</p> <p>Having considered the applicant submitted information including: Design and Access Statement, prepared Bubble Architects, dated 12 November 2025; Energy & Sustainability Statement prepared by XCO2, dated 10 November 2025, taking note of the proposal to install Air Source Heat Pumps (ASHP) and solar PV; Air Quality Assessment prepared by XCO2, dated 10 November 2025, taking note of Section 4 (Methodology), 5 (Baseline Air Quality and Exposure Assessment), 6 (Potential Impacts), 7 (Air Quality Neutral Assessment), 8 (Mitigation), please be advised that we have no objections to the proposed development in respect to air quality and land contamination but the following planning conditions and informative are recommended should planning permission be granted.</p>	<p>Support noted and conditions attached.</p>

1. Land Contamination

Before development commences other than for investigative work:

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

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

2. Unexpected Contamination

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

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

3. **NRMM**

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

Reason: To protect local air quality and comply with Policy 7.14 of the London Plan and the GLA NRMM LEZ

4. **Management and Control of Dust**

While we take note of the Air Quality Assessment prepared by XCO2, dated 10 November 2025, no works shall be carried out on the site until the specific locations of PM10 dust monitors and how these results will be made available to the Pollution for ongoing assessment has been submitted to and approved in writing by the Local Planning Authority. The works shall be carried out in accordance with the approved details thereafter.

5. **Considerate Constructors Scheme**

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

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

Informative:

	<p>Prior to demolition or any construction work of the existing buildings, an asbestos survey should be carried out to identify the location and type of asbestos containing materials. Any asbestos containing materials must be removed and disposed of in accordance with the correct procedure prior to any demolition or construction works carried out.</p>	
Arboriculturist	<p>From an arboricultural point of view, I do have major concerns.</p> <p>The proposal has a high tree count removal.</p> <p>We will require a tree report carried out to British Standard 5837: 2012- Trees in relation to design, demolition and construction- Recommendations.</p> <p>Until we receive the above, I cannot comment further or support the application.</p>	<p>Comments noted. Tree reported submitted.</p>
Noise Team	<p>The noise team do not have any comments to make in regards to this application</p>	<p>Comments noted.</p>

Local resident's objections	ISSUE RAISED/COMMENTS MADE	OFFICER'S COMMENTS
No of individual responses:5 Objecting: 5 Supporting:0		
	Overdevelopment/high density	The proposal is a medium-rise development, set within generous green space. All homes would meet or exceed national space standards, and each would have their own private amenity space. The proposal is not considered an overdevelopment. Furthermore, London Plan has moved away from density metric calculations and instead support design led approach, that is development that take into account the surrounding, context and layout
	Additional parking is required	The proposal is car-free. This means new residents will not be eligible for estate parking permits, helping to protect existing parking provision for current residents. The proposals also include two dedicated disabled bays, which will be allocated for the sole use of the adapted homes. Furthermore, there no loss of parking which means that residents will continue to have access to the same level of provision. As such no additional parking is required.
	Loss of open space	The proposal would result in the reconfiguring of existing open space as such not considered as a loss of open space. Given the poor nature and usability of the existing space, officers consider that a new housing development, which would include well-designed green spaces including a

		new communal garden and a net increase in the number of trees on the site; providing a high quality, usable, accessible environment.
	Noise and disturbance	Construction noise and disturbance is temporary and is subject to restricted hours.
	Overcrowding	The proposed development would comprises of 17 new homes which are much needed to meet housing targets. The development has been carefully sited and designed to fit into its challenging context and to safeguard neighbouring residential amenity. In particular, the scale and form of the proposed buildings reflect the shape of the site, its boundary conditions and the nature of the local built environment and neighbouring residential and visual amenity. The new buildings have been carefully sited and at four-storeys to respond to the position and scale of neighbouring property and safeguard adjoining amenity. As such, it is not considered the proposed development would result in overcrowding.
	Proposed green space is gated	The proposed courtyard is designed to be secured during hours of darkness, to ensure access for residents only and to reduce anti-social behaviour. All enclosures would comply with Secure by Design requirements.
	Inadequate parking space for existing and new residents	There is no loss of car parking and the proposed development is a 'car free' and located within walking distance of public transport links. Residents of the proposed development will not be permitted to apply for parking permits. Only 2

		car parking spaces will be provided for people with disabilities. As such, there will not be a significant increase in transport and parking pressures.
	Green energy generation not considered	The applicant submitted an Energy Statement which demonstrated that following energy generation are considered suitable, energy efficient building fabric elements, high-performance glazing, mechanical ventilation with heat recovery, air source heat pumps and solar photovoltaic panels for on-site renewable energy generation. These were considered acceptable by the carbon officers and complies with relevant policies.
	Additional green space is required	A courtyard is proposed which would be located between the two new blocks and further enhancements to existing amenities space are also proposed. Therefore, it is considered that additional amenity has been incorporated.