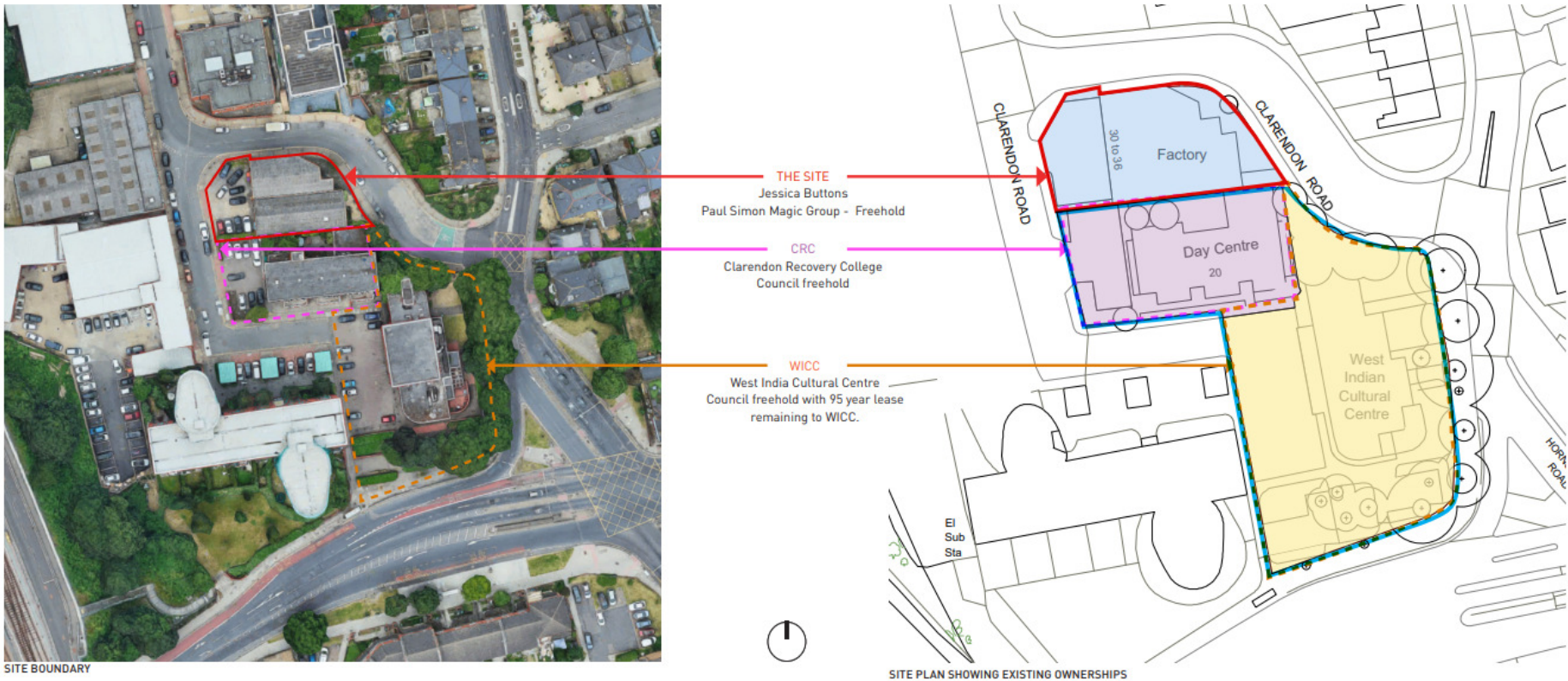
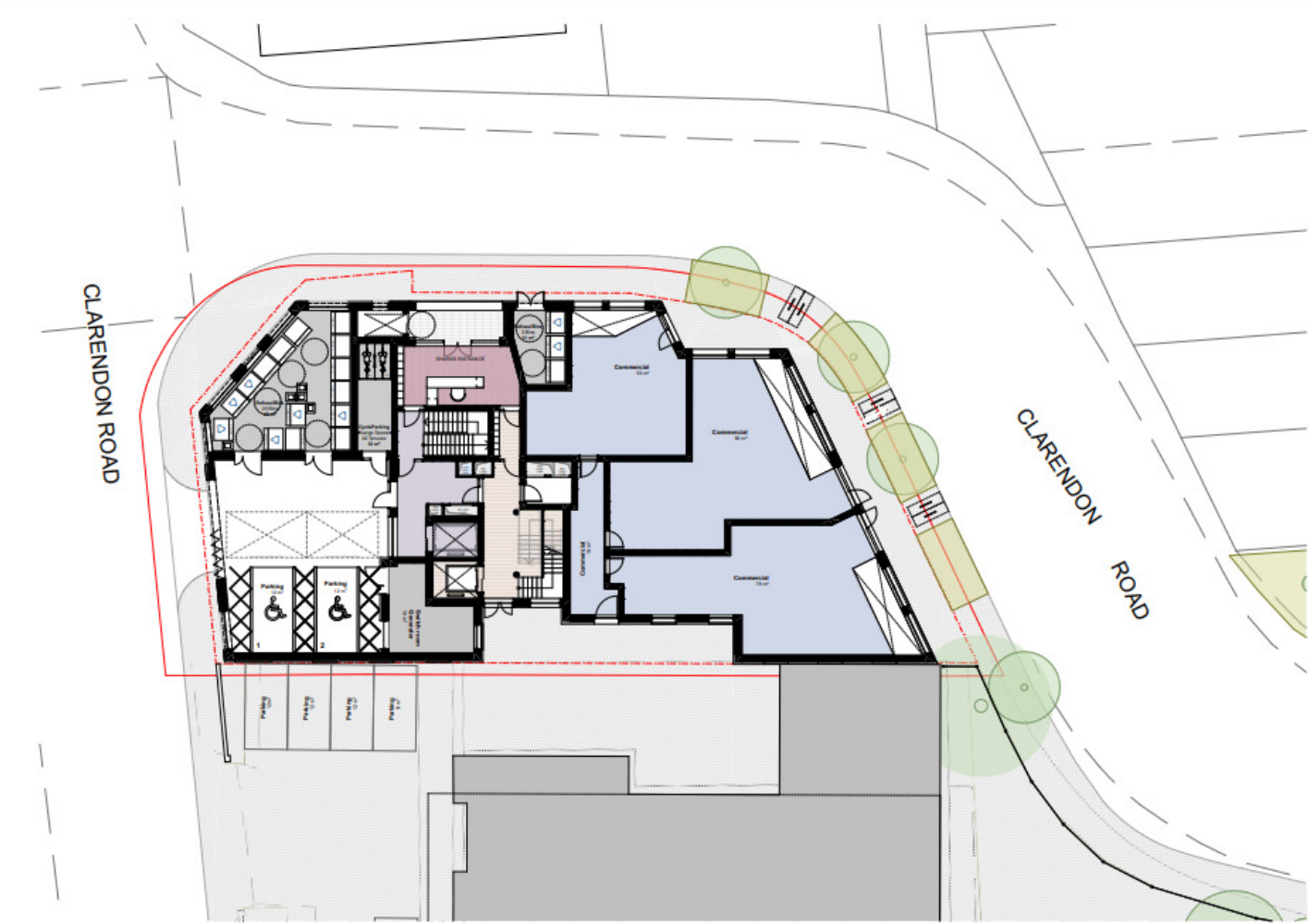


Appendix 2 – Plans and images



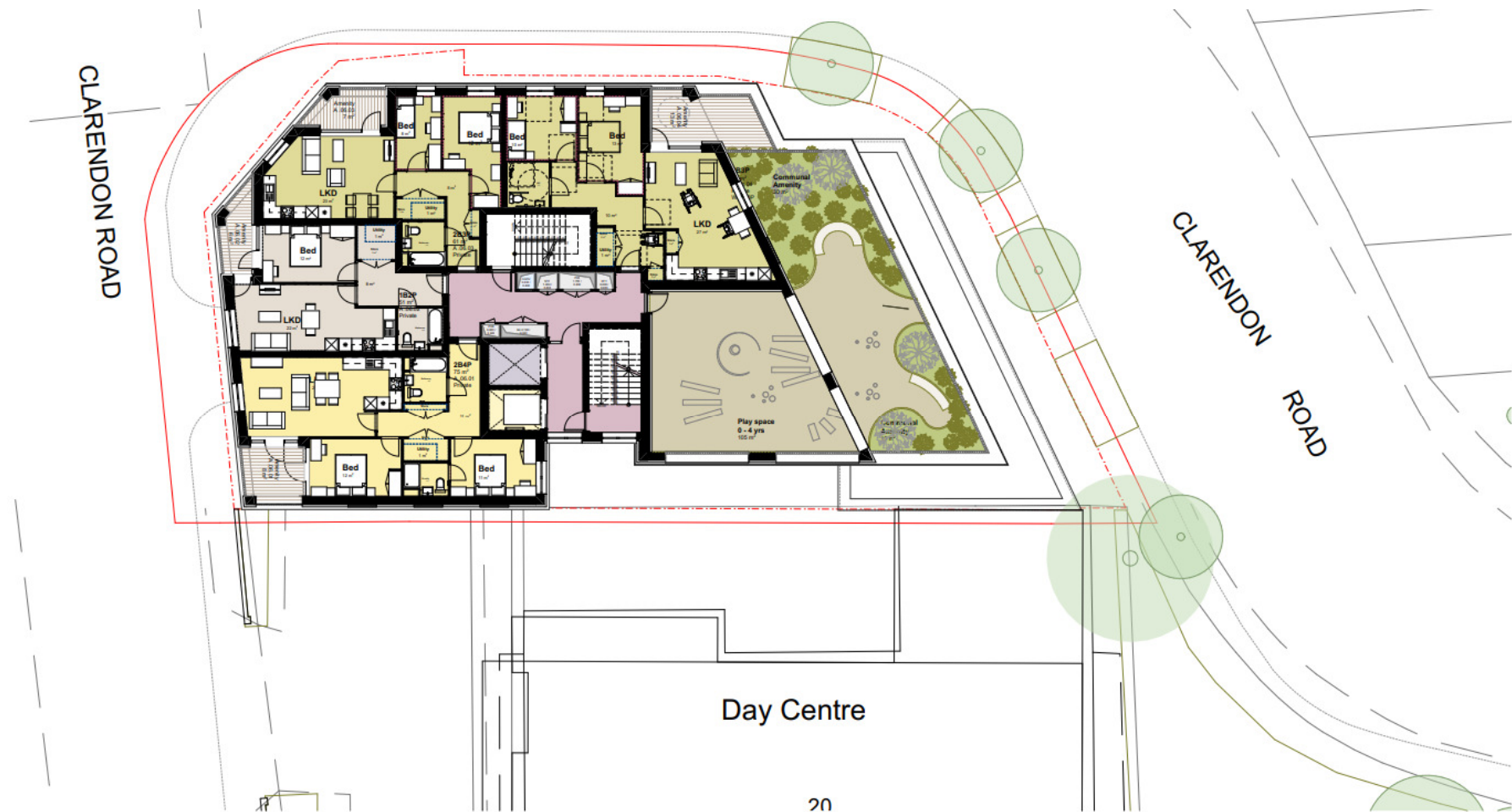
Proposed ground floor



Proposed first floor



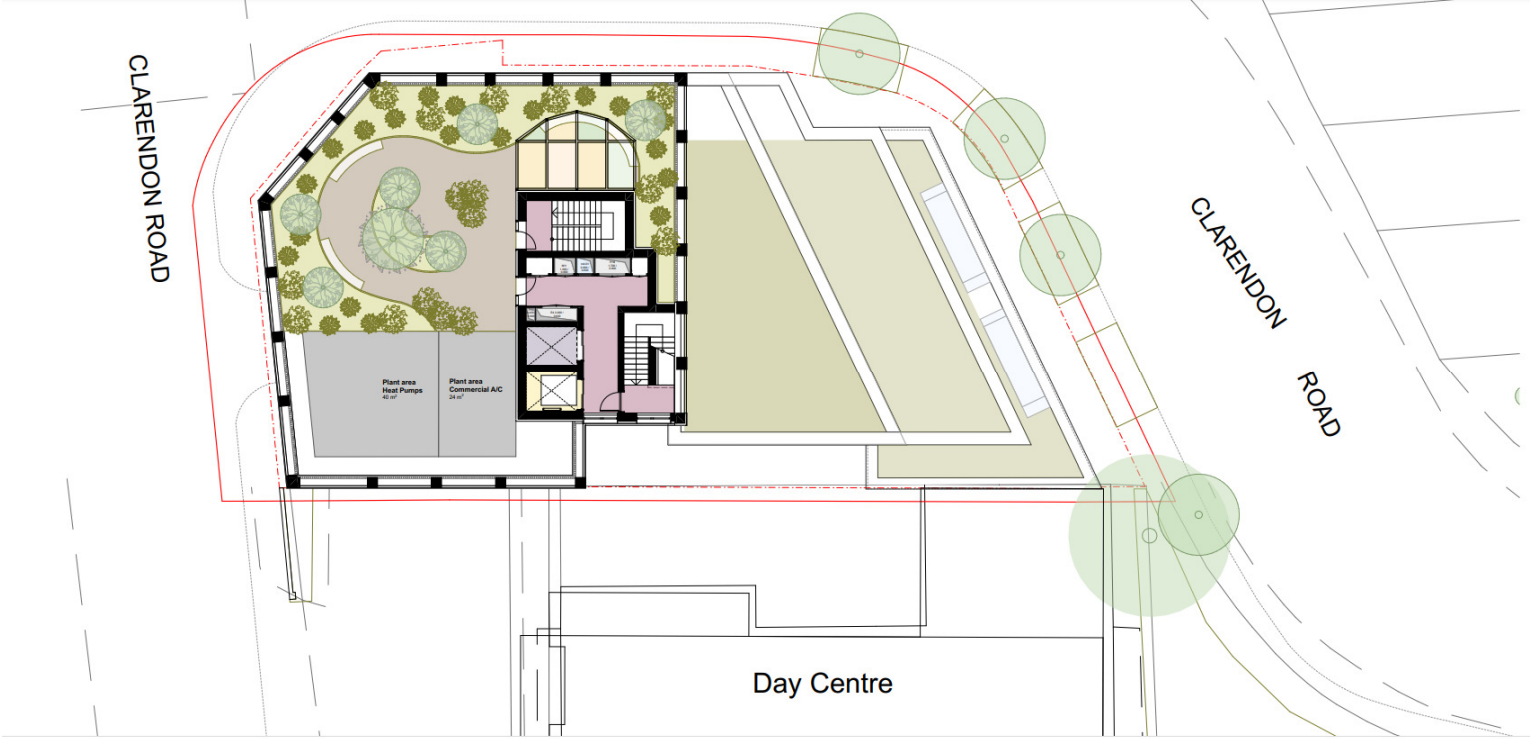
Proposed 6th floor



Proposed eighth floor



Proposed roof plan



Clarendon Road Approach View



Departing Clarendon Road



Appendix 3 Consultation Responses from internal and external agencies

Stakeholder	Question/Comment	Response
INTERNAL		
Design	Having been closely involved in discussions with the applicant for this development from pre-application, including for the former larger scheme that also included two neighbouring sites, I am very familiar with these proposals, the site and the relevant issues. As such I have no concerns with these proposals, which are well designed and appropriate to the site, and will provide much needed housing, new business units to increase employment and will fit in well with and help encourage the further development of this important part of the Haringey Heartlands Growth Area. Site Location & Context The site is towards the southern end of the Haringey Heartlands Growth Area. This London Plan and Haringey Local Plan designation covers a large area of existing and former industrial land between the Metropolitan Town Centre along Wood Green High Road to the east and the West Coast Main Line railway to the west. Butting up hard against the railway embankment, which is wooded and a designated Ecological Corridor, the Growth area only extends east as far as the back gardens of existing two and three storey, Victorian terraced housing where that exists between the town centre and industrial area, and here , towards the southern end of Heartlands, there are several such residential streets. Just south of the site, Heartlands ends at Turnpike Lane, a major east-west street connecting Turnpike Lane Station, at the southern end of Wood Green High Road, and a major transport interchange a 15 minute walk to the east, with Hornsey High Street, a 5 minute walk under the main railway line to the west. Surrounded by other industrial and community uses in a mixture of two and three storey buildings of up to forty years old, but generally more recent, either side of the straight, north-south spine of Clarendon Road. However, a 1990s housing block, Westpoint House, closes the end of Clarendon Road, cutting it off from Turnpike Lane, just one	Comment noted

Stakeholder	Question/Comment	Response
	property south of the site. A double curving recent road connects Clarendon to Hornsey Park Road, just north of its crossroads with Turnpike Lane and Wightman Road, a major interchange in a wide, nebulous space, dominated by busy traffic, turning lanes and numerous pelican crossings. Heading north, Clarendon Road becomes Mary Neuner Way where it enters the former gas works, currently being redeveloped by St William, in a large major development known as Clarendon Square, to designs by Panter Hudspith. This development has done much to firm up the model of how Heartlands should be developed, albeit that the amount of workspace and residential, and acceptable height, varies across the wider Heartlands area. The site is part of a Site Allocation, SA23: Clarendon Road South, for employment-led mixed-use development. The allocation requires re-provision of the West Indian Cultural Centre, maximum feasible quantum of employment floorspace (but that enabling residential will be acceptable), taller development acceptable on the west of the site, but the east side should take account of the scale of properties on Hornsey Park Road. Draft site allocation WGSA24 (consultation draft Wood Green AAP) also recognises the potential for the site to be used more intensively to create a new mixed-use development including community, employment and residential uses. An allocation in the forthcoming new draft Local Plan is likely to be similar. Masterplan As part of the site allocation requirement, given that the application site forms only a small part of a large adopted Site Allocation, itself part of a larger designated Growth Area, the applicants are required to demonstrate through masterplans that their proposals are compatible with both the existing context and likely, similar, SA23 compliant development on some or all of the other sites within this allocation and its neighbours, particularly those in closest proximity. The large major development at Clarendon Square, the former gas works site, a short distance to the north of this site and adjoining the northern edge of SA23 is the most significant and in many ways forms a suitable model for development of the whole of	

Stakeholder	Question/Comment	Response
	this allocated site. In particular, officers strongly recommend the model of fragmented blocks, forming a street edge interspersed with landscaped courts connected to the streets, with stepped and L-shaped blocks creating glimpses through to private rear courtyard amenity spaces, as well as of the gradation of heights from low to the backs of the existing two and three storey terraced houses east, to higher to the railway embankment to the west, is followed. Clarendon Square also includes a gentler rise of height from south to north, with their interface with the Chocolate Factory / Haringey Cultural Quarter site at Coburg Road, identified as the suitable place for Tall Buildings. This will aid wider legibility, identifying the heart of the growth area, where the cultural quarter is, be connected back to Wood Green High Road via a new east-west link and mark the Penstock Tunnel crossing under the wide barrier of the railway to the west, linking to Alexandra Park. Officers have long accepted that the Turnpike Lane interface, particularly its crossroads with Hornsey Park Road / Clarendon Road and Wightman Road, has an equally strong justification as a location for height, especially as the wide space of the crossroads is somewhat nebulous, albeit that it would be just as a point block at the southern end of the WICC site. Having said that, the only opportunity for a transition from that point block would be on this (& the CRC) site. This thinking leads to a longer north-south height profile that drops from tall to mansion-block (6-8 storey) north to south across Clarendon Square, then rises similarly gently across Clarendon South, justifying the 11-storey height proposed for this. This proposal has undergone a long and at times tortuous gestation, being originally part of a larger comprehensive proposal, which was also for the two neighbouring sites to its south, the Haringey Recovery College (CRC - immediately south) and West Indian Cultural Centre (WICC - beyond and to its south-east) that was developed right up to a planning application but fell through for unconnected reasons. Nevertheless, the applicants have convincingly demonstrated that this proposal would be completely compatible with an effective completion of the rest of the development on those two sites. They have also demonstrated convincingly that a separate development on just	

Stakeholder	Question/Comment	Response
	the CRC site, either as previously envisaged, with a similar height alongside the taller part of this proposal at the western end of the site, or on the most impactful alternative, with a similar height but pushed instead to the eastern end of the CRC site, would be compatible with these proposals. Other sites within the allocation are separated by at least the width of the street from this. Many are, it would appear, currently unlikely to be redeveloped in the short-to-medium term, including two that have recently been modestly extended, but we know at least one is in advanced current pre-app discussions. Nevertheless, officers are confident that the street width separation and a pattern of development that includes courtyards off the street, will maintain a pleasing streetscape and good residential amenity. This development can be considered compatible with that pattern of development, provided neighbouring sites maintain that pattern, and therefore can be considered compatible with potential future developments on the northern or western sides of the neighbouring streets to this site. Streetscape Character & Pattern of Development The site is on the corner of a junction, between the main north-south alignment of the original Clarendon Road and the point where the original' straight, north-south alignment of Clarendon Road was previously disrupted, by the construction of Westpoint Apartments closing off its previous connection to Turnpike Lane, and a new, double-curved street, also named Clarendon Road, connecting traffic to Hornsey Park Road, just north of its crossroads with Turnpike Lane and Whiteman Road. The eastward, "chicane" section of Clarendon Road is deeply unsatisfactory in urban design and streetscape terms, being pedestrian unfriendly with lack of legibility and limited active frontage, particularly at the current configuration of this application site, which very much fronts west, with side flank small windows and rear 3 high fences to the chicane portion, with CRC and the WICC doing much the same. At the same time its western frontage, like that of CRC, are set well back from the dead-end continuation of Clarendon Road, which itself peters out in residents parking for Westpoint and a car-park / service yard for WICC.	

Stakeholder	Question/Comment	Response
	Although redevelopment of the two neighbouring sites will be required to fully repair the streetscape here, this proposal goes a long way to improving things. The proposed building form and architectural treatment addresses the junction, with a faceted corner and the highest point marking the junction, whilst the most active frontage, with the residential main entrance and the three business units' front doors and "shopfront" windows facing north and east. The development also widens, moderately straightens and greens-up the chicane frontage, with a set-back building line, widened pavement, new street trees and raingardens. No significant new public realm is created in this proposal, so it does not directly contribute to creation of a courtyard garden or yard as established in the Clarendon Square precedent, but as the height cascades down in its eastern side in a series of landscaped roof terraces, providing private amenity and play space for residents of this proposal, its landscaped quality would become evident and connect to the "greenedup" eastern chicane of Clarendon Road. The small courtyard / lightwell space in the central third of this proposal's southern flank could also connect to the envisaged courtyard part of the CRC site, and the development does provide a nett gain in usable public space. Form, Bulk, Height, and Massing At eleven storeys, this proposal just meets definition of a Tall Building, defined as of 10 storeys or over in our adopted local plan, and rather more easily meets the stricter, more recent, government definition, of over six storeys. Nevertheless, the site is within a zone recognised in Haringey's Local Plan as suitable for tall buildings, and the design officer assessment is that the site and this proposal can be justified as a tall building. At eleven storeys, this proposal just meets definition of a Tall Building, defined as of 10 storeys or over in our adopted local plan, and rather more easily meets the stricter, more recent, government definition, of over six storeys. Nevertheless, the site is within a zone	

Stakeholder	Question/Comment	Response
	recognised in Haringey's Local Plan as suitable for tall buildings, and the design officer assessment is that the site and this proposal can be justified as a tall building. • The site is within the areas of both the adopted Local Plan and draft Wood Green AAP, both supporting the principle of tall buildings in this location; • The council prepared a borough-wide Urban Characterisation Study in 2016, which supported tall buildings in this location, as part of a cluster marking the southern end of the Heartlands Growth Area; • High quality design especially of public realm is being delivered by other developments within Heartlands, particularly Clarendon Square, and can be further expected as part of the WICC development, with which this proposal will be integrated; • The applicants Design & Access Statement demonstrates how they have considered local and more distant views of the proposal, further discussed below; • The proposal will be capable of being considered a "Landmark" by being a wayfinder and a marker within the masterplan, marking the junction in Clarendon Road and forming a subsidiary part of a n intended cluster at the key junction of the Turnpike Lane etc crossroads (where the tallest node will be on the WICC site), and forming a gateway to the heart of Tottenham Hale; • It will also be capable of being considered a "Landmark" by being elegant, well-proportioned and visually interesting when viewed from any direction as discussed below; • Consideration of impact on ecology and microclimate encompasses daylight, sunlight and wind, are assessed by others, but this proposal is not expected to have a significant impact, being well away from any protected biodiversity. Impact on ecology could also include impact on the flight of birds and other flying	

Stakeholder	Question/Comment	Response
	creatures, but this is only likely to be relevant adjacent to open countryside, a large open space or open waterway, which this is not; • The proposed tall buildings will be in proximity to a number of other tall and less tall buildings, but impact on them and of them on this proposal is considered in detail in the applicants views; • And the urban design analysis and 3d model views of their proposal satisfactorily shows that the tower could be a successful and elegant landmark, contributing to the planned cluster of tall buildings. • The detailed design of the tower has undergone extensive revision and refinement, in conjunction with numerous workshops with Officers, during the course of this application, particularly in making the tower more slender and elegant. For the design to be successfully “read” in more distant views, there has to be a significant contrast between the base, middle and top. This proposal is designed with a distinct two storey base, in a darker brick on a more open grid, expressing the commercial uses and residential entrances, and incorporating first floor flats behind terraces. The base will feature intricately detailed brickwork, reflecting details used in the Clarendon Square development and providing a more robust facade, where traffic & discolouration is likely to be greater. The middle is then formed by more domestically scaled windows in a two-storey grid of windows and recessed balconies, in a middle-toned brick, with the top expressed as a four-storey giant frame with infill of more textured brickwork. The form of the proposed tower is also expressed in the “cascade” of roof terraces down its eastern side, integrated into the two-storey grouping of the middle of the composition and better integrating this taller building into the lower rise buildings to its east.	

Stakeholder	Question/Comment	Response
	Elevational Treatment, Fenestration & Balconies These proposals have an orderly, elegant and exceptionally carefully designed elevational treatment, expressing the base, middle and top and the cascade of roof terraces as mentioned above. Openings, whether they are doors at ground level, or windows and recessed balconies throughout, are at least paired vertically. In the base (ground and first floor), the darker brick frame has a textured detailing, and windows are larger, with the small areas of remaining intervening brickwork flat. Over the middle, the main expanses of brickwork are flat with textured brick spandrels between paired windows and projecting horizontal bands between each pair of floors, integrated to the steps in the eastern façade. And finally, at and top, larger expanses of textured brickwork and larger windows are between the flat brick giant four storey frame that also hides rooftop plant and lift overruns. Windows are also vertically proportioned, except in the base, expressing the different residential and commercial uses. Importantly, window reveals, and brick profiling generally will be deep, giving a solidity and vibrancy to the well-considered façade modelling, and adding to residents' privacy. Roof terraces are screened behind high parapets, coordinated into the pairing of floors, supplemented by a low balustrades. Balconies are always recessed, for added privacy and to better integrate them into the building and façade composition. Balustrades are designed with vertical balusters to give light into and views out from them whilst giving some privacy and hiding clutter in more oblique views. Materials & Detailing The proposed materials palette is brick-based, with a crème brick proposed for most floors and a darker grey brick for the ground and first floor base, but a precise brick is not specified. The Design and Access Statement suggests it should be a crème and dark grey brick with a strong red-brown element and a degree of warmth and variation, which would be strongly supported on design grounds, and would be dependent on selection required by condition. Metalwork to windows, balustrades etc would be in complimentary colours, similarly agreed buy condition.	

Stakeholder	Question/Comment	Response
	Careful consideration has been given to design of doors and ground floor windows, to give a light and airy opening to the main residential entrance, flexible “shopfronts” to the commercial units and robust but interesting solid doors to more functional doors. In particular, the decorative patterns to these solid doors will permit ventilation, to refuse stores and car parking, yet hide potentially ugly functions and still provide visual interest and a surface discouraging of and resistant to vandalism and graffiti. Residential Quality All maisonette, flat and room sizes comply with or exceed minima defined in the Nationally Described Space Standards, as is to be routinely expected. All flats also have one or two recessed balconies providing private external amenity space, all of which are at least as large as the London Plan requirement. Most of the proposed flats (61%) have full dual aspect. Of the few that do not (two per floor on 1st-5th, one per floor on 6th-10th floors), all also have a side window onto their recessed balcony, all are east or west facing, the best direction for single aspect units, and all are single bedroom flats, so that all potential family sized flats have two aspects. In addition to each flat having at least one private balcony, there are three landscaped communal external amenity terraces, at the 6th floor, 8th floor and roof level. Those on both the 6th and 8th floors include large equipped childrens playspace, with that in the 6th floor including a large covered external play area as well as the area open to the sky; these meet the GLA policy requirement for playspace for the development for 0-4 and 5-11 year old children. The remainder of those two roof terraces and the whole of the rooftop accessible terraces will include planting beds for biodiverse ornamental plants and shrubs, seating benches, decking and potted small trees, with a pergola included on the rooftop terrace, considered a more “adult” communal amenity space.	

Stakeholder	Question/Comment	Response
	There will also be biodiverse green roofs to the inaccessible roofs at the 2nd floor and over the rooftop plant and lift/stair core. In addition to the new street trees, landscaping and raingardens to the chicane street, these will contribute to an overall high impression of verdant greenery for such a large and sitefilling development. Privacy & Outlook This proposed development will be relatively distant from any existing homes but is expected to be joined onto the neighbouring future part-residential development on the CRC site to the immediate south, and in close proximity to several others, as part of the expectation of continued intensification and redevelopment of the wider Haringey Heartlands area and the rest of this site allocation in particular. In expectation of the neighbouring development on the CRC site, this development generally turns its back on its southern flank, with windows to the lift and stair cores and a few secondary residential windows (to bedrooms, bathrooms, kitchens and circulation), onto the small lightwell, and no openings except the sides of west facing recessed balconies withing the flank walls against the boundary. There should be no objection to development on the CRC site being build right up to any part of their mutual boundary with no openings, or being close to any part of their mutual boundary, including some potential locations for windows to habitable rooms, that would not cause a privacy concern, in the relatively unlikely event that they needed north facing windows. These applicants' masterplan goes into detail of how a couple of possible neighbouring developments could match this site's development quantum without creating any privacy concerns. Other neighbouring potential development sites are all separated from this site by at least a street width, which should be close to or more than the 18m necessary to ensure privacy, notwithstanding that there is less expectation of privacy to street facing windows. It should also be noted that in many flats where bedrooms face the street, they are recessed behind balconies.	

Stakeholder	Question/Comment	Response
	Daylight & Sunlight 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..." 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, 2011), known as "The BRE Guide". The assessment finds that the impact of the development on existing neighbouring residential properties is generally favourable for both daylight and sunlight, with only 21 neighbouring existing residential windows found to lose a noticeable amount of daylight, and 15 neighbouring windows losing a noticeable amount of sunlight. Notably, none of the older residential properties on Hornsey Park Road or further east or south would lose a noticeable amount of daylight. The only residential properties affected would be 16 north facing windows in Westpoint apartments, 13 of which are only marginally affected and the remaining 3 are beneath overhanging balconies, and 5 windows in Katerina House (50 Clarendon Road), a recent conversion of workspace without planning permission that in all cases are to windows below overhanging balconies. Four relatively small windows to the rear of nos. 23 & 29 Hornsey Park Road that would lose noticeable amounts of sunlight are close to rear	

Stakeholder	Question/Comment	Response
	projections to their south making it difficult to avoid some loss, whilst the affected windows in 50 Clarendon Road (Katerina House) are again beneath projecting balconies. The assessment also finds that no existing neighbouring external amenity spaces would lose noticeable amounts of sunlight. Given that the existing building is a low 2 storey structure, meaning neighbours have been receiving more day and sunlight across the application site than would be expected, these results can be considered wholly acceptable. The applicants' assessment also finds the proposals would achieve good levels of daylight to the proposed dwellings. Only 12 rooms in the whole development would receive less than the BRE Guide recommended daylight levels, of which seven are very close to the recommendations. Just three relevant rooms (living rooms within 90° of south) fail to achieve the BRE recommended sunlight levels. All of the proposed outdoor communal amenity spaces meet the recommendations. In the case of higher density developments, it should 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. In particular, the 27% VSC recommended guideline is based on a low density suburban housing model and in an urban environment it is recognised that VSC values in excess of 20% are considered as reasonably good, and that VSC values in the mid-teens are deemed acceptable. Paragraph 2.3.29 of the GLA Housing SPD supports this view as it acknowledges that natural light can be restricted in densely developed parts of the city. Therefore, full or near full compliance with the BRE Guide is not to be expected and the fact that it is very nearly achieved here is considered an excellent performance. Conclusions This proposal is for a well-designed mixed use development that would provide a significant number of high quality new homes as well as improved workspace in and are	

Stakeholder	Question/Comment	Response
	identified as suitable for considerably increased intensity, density and height of development in adopted London and Haringey Planning Policy. The applicants have demonstrated it would be complimentary to a range of different likely development., or of no change, on neighbouring sites also within the Growth Area, and not be harmful to character and amenity of areas outside of the Growth Area. It would also encourage progress on development of the wider Haringey Heartlands Growth Area, form a marker of development and contribute to its extension into the Clarendon Road South site allocation, towards the anticipated landmark development at the key crossroads on Turnpike Lane. A high quality, brick based materials palette and detailing language compliment the well-considered, attractive proposed composition	
Transportation	<u>Development proposal</u> The proposals are for the demolition of the existing building and construction of an eleven storey building to provide 51 residential Units and 560sqm of commercial floorspace. The breakdown of the residential units is as follows; 19 N. 1 bedroom units 26 No. 2 bedroom units 6 No. 3 bedroom units. 5 of the residential units will be fully accessible/wheelchair units. 2 off street blue badge parking bays are proposed and 93 long stay, and 12 short stay cycle parking spaces as well. <u>Location and access</u> This site is currently the 'Jessica Buttons' factory and is located on Clarendon Road.	Observations have been taken into account. The Recommended legal agreement clauses and conditions attached.

Stakeholder	Question/Comment	Response
	It has a PTAL value of 4-5, considered 'good' to very good' access to public transport. Bus services are close by, Turnpike Lane Underground station is a 9 minute walk away, and Hornsey National rail station a 7 minute walk away. Areas of 'excellent' public transport accessibility (value 6A) are close by. It is also located within the Wood Green Outer CPZ which has operating hours of 0800 – 1830 Monday to Saturday. The Wood Green Inner CPZ boundary is close by, at the junction of Clarendon Road with Hornsey Park Road to the west of the site. <u>Transportation considerations</u> In assessing this application, we have to consider the current use of the site and the temporary use granted as a nursery and church as part of the decant due to a nearby development by the same applicant. The existing temporary church and nursery use forecasted that there will be some 220 attendees attending the Church with a total of 40 cars arriving and departing during the busiest time periods (09:00-10:00 and 13:00-14:00) the applicant provided a total of 9 car parking spaces on site and the remainder of the vehicles would have parked on street. The nursery element would result in 6 car trips during the critical AM and PM periods. <u>Access arrangements</u> A vehicular access will be required to the western side of the site which will require alteration to the existing crossover/access. The applicant's proposal includes changes to the waiting and loading restrictions and public realm changes at the site on the eastern side, the alteration to the public highways will need to be secured by a Section 278 Agreement under the Highways Act, with the applicant meeting all of the Councils and works costs. <u>Car parking considerations and permit free status.</u>	

Stakeholder	Question/Comment	Response
	As the site is located within a CPZ and has good to very good public transport accessibility, it meets the criteria of policy DM32 to be formally designated as a car free/permit free site. A car free s106 agreement will be required to restrict eligibility of all occupiers from obtaining CPZ parking permits. The developer will be responsible for cost (£4000) for amending the CPZ. Designation as a car free/permit free development accord with Haringey and London Plan policies and is appropriate. The TA includes details of a parking stress survey. This recorded survey wide stresses of 72% across the 500m wide/walk distance survey area. 277 spaces were recorded as available within this area. Looking at the streets closest to the site, it is noted there were only a low number of available spaces recorded in Clarendon Road and Mary Neuner Road, however 13 available spaces were recorded overnight within the Avenue. Given the very good access to public transport services, close proximity to local shops and services on the south side of Turnpike Lane, and car free status with comprehensive formal parking controls, it is not anticipated that there will be much car parking demand generated at all by this development proposal. Of the 51 units only 6 are family sized. There will also be a travel plan and Transportation will require and enhance car club provision to further mitigate any potential parking demands that could arise. All of these components will work together to reduce potential parking demands. The transport planning and highways authority is aware that there are local parking issues reported by residents, that are essentially resultant from events related parking pressures generated by the adjacent community centres and facilities. The Highways and parking team developed possible measures to address these issues following a number of requests received from residents prior to Covid 19 to increase parking controls on Clarendon Road N8. The parking team conducted a video traffic survey to understand the level of infringement of parking restrictions and on footways for a potential parking scheme in Clarendon Road N8. Results of this surveys shows a significant change in parking violations post the Covid 19 pandemic with no infringements being recorded during the duration of the surveys which were	

Stakeholder	Question/Comment	Response
	commissioned to take place whilst events were taking place at the local community centres. Ultimately the issues experienced can only be addressed by a mixture of active parking enforcement and behavioural change. Any potential parking impacts resultant from this development proposal are likely to be very minor and only result in additional parking outside of CPZ operational hours. It is therefore not possible for the Transportation Planning and highways authority to object to this application on parking grounds as there is sufficient parking restriction to prevent illegal parking in this location in the form of double yellow lines with blips, the issue is therefore one of enforcement. We have also concluded that the development proposal will result in less parking demand when compared to the existing use as a Church. <u>Blue badge parking</u> The London Plan requires provision of 3% blue badge parking from the outset and the ability to provide 10% if required. The two spaces proposed for off street meet the 3% requirement. The applicant has suggested conversion of existing on street bays to provide additional blue badge parking in close proximity to the site if demands require. Whilst the London Plan policy requires the ability to provide up to 10%, it is not necessarily expected that this full demand will materialise. The applicant will need to provide a plan for meeting the future demands of the occupiers of the accessible units at the site, and detail what steps are to be taken to react to demands and implement further bays, which would require agreement with the highways and parking teams at Haringey. This will be secured via the parking management plan which will be monitored as part of the travel plan which will be secured by the S.106 agreement. <u>Cycle parking</u> Cycle parking provision for 93 cycle spaces is proposed – comprising of 74 spaces (two tiered), 14 spaces (Sheffield stands) and 5 spaces for larger bicycles. These cycle spaces are located in the basement and an access lift measuring 1.2m x 2.3m will be	

Stakeholder	Question/Comment	Response
	provided. In addition, it is proposed to provide six 'Sheffield Stands' (12 cycle spaces) on Clarendon Road for short stay cycle parking. It is noted that the short stay/visitor cycle parking appears to be located within the highway adjacent to new areas of public realm that will be created by this development. Detailed drawing of the public realm works must be provided for approval and will be secured by the S278 Agreement. A pre commencement condition requiring submission of details of cycle parking provision for the commercial use (worst case for uses permitted within use Class E), for approval prior to occupation, is required. All cycle parking is to be designed and detailed to meet the London Cycle Design Standards. <u>Delivery and servicing arrangements</u> The application is supported by a draft delivery servicing management plan (DSMP). There is reference to one delivery and servicing visit for the commercial/office floor space, and 8 for the residential units. The applicant envisages all delivery and servicing activity to take place from the adjacent kerbside from the carriageway. Smaller service vehicles could use any available CPZ bays, larger vehicles would need to park to the perimeter of the development. This would require removal of or adjustments to the double yellow line restrictions with double blips that prevent any loading activity at present, which have been implemented to address the event related parking issues that have arisen. A pre commencement condition for the developer/applicant to agree a regime of adjustments to existing on street waiting and loading restrictions will be required to ensure that any proposed changes are safe and appropriate from the highway	

Stakeholder	Question/Comment	Response
	perspective. Any changes will need to be included within the S278 Agreement. A separate pre commencement condition for an enhanced delivery and servicing plan to address this issue will be required. It is noted that refuse and recycling collections are envisaged as taking place from both sides of the development and the proposed storage and collection arrangements will need to be supported by the Borough's waste team. The details for these should be included in the enhanced Delivery and Servicing Plan. <u>Car club facility</u> As commented earlier in this response, the further mitigate any potential parking impacts, the applicant should include a car club facility for the development. This must be covered by the section 106 agreement and should include the applicant providing details of the recommended provision by the car club operator. It is expected that this will include two years free membership for each unit plus a driving credit of £100 per unit. <u>Travel Plan</u> There is reference on the application to provision and implementation of a Residential Travel Plan. This must be secured by the S106 or by condition and submitted to the council for approval no less than 3 months before the development is occupied. <u>Construction Phase</u> The application is supported with an outline construction logistics plan, this must be secured by S106 agreement including a monitoring contribution of £10,000 (Ten thousand pounds), to monitor this development proposal and the other development proposals in the Wood Green area to ensure that activities are coordinated and safety and integrity of the highways network is maintained. We will require the applicant to	

Stakeholder	Question/Comment	Response
	submit detailed Construction Logistics Management Plan for approval prior to the start of any works. The applicant should be advised to undertake early discussions with Haringey Highways Construction Logistic Team to agree traffic management arrangements that may be required. <u>Summary</u> This application is for redevelopment of the site at 30 to 36 Clarendon Road, to provide 51 residential units and some commercial floor space. The development is proposed as car free except for two blue badge spaces to be located within the site. The development is appropriate to be dedicated as a car free development, in line with the London Plan Policy T6 Car Parking, and Haringey Development Management DPD Policy DM 32, as this location is located in an area with a high public transport accessibility level and a CPZ is in place to restrict parking. In addition any parking demands generated by the development is likely to be minor when combined with the proposed mitigation measures such as the permit free status, travel plan, car club and high-quality cycle parking provision, in addition local shops and services are located within a short distance of the development. It is recognised that there are existing parking issues and nuisance generated by some event activity at the community facilities located close by, this application should not worsen this situation and reduction in nuisance generated with this issue will have to come from behavioural change and ongoing parking enforcement. It is also to be noted that the proposed residential units will generate less trip and parking demand when compared to the existing use as a church and nursery. We will require the following section 106 obligation and conditions to be secured as part of the proposed development to ensure that the development proposal complies with the policy requirements of the London Plan, Haringey Local Plan and Haringey Development Management DPD, subject to the following conditions section 106 obligations and conditions we have no objection to this development proposal:	

Stakeholder	Question/Comment	Response
	1. 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 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 Club Membership The applicant will be required to enter into a Section 106 Agreement to establish a car club scheme, which includes the provision of two years’ free membership for all residents and £100 (one hundred pounds in credit) per year/per unit for the first 2 years. Reason: To enable residential occupiers to consider sustainable transport options, as part of the measures to limit any net increase in travel movements. 3. 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 £5,000 (five thousand pounds). 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;	

Stakeholder	Question/Comment	Response
	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; and d) Details of measures to protect pedestrians and other highway users from construction activities on the highway. 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 of the amenity of neighbour properties and to main traffic safety. 4. Cycle Parking The applicant will be required to provide long and short-stay cycle parking provision, for both residential and non-residential elements of the development, in line with the London Plan (2021), cycle parking is to be design and implemented in line with the London Cycle Design Standards. Reason: To promote travel by sustainable modes of transport and to comply with the London Plan (2021) standards and the London Cycle Design Standards. 5. Delivery and Servicing Plan The applicant shall be required to submit a Delivery and Servicing Plan (DSP) for the local authority's approval. The DSP must be in place prior to occupation of the development. The delivery and servicing plan must also include a waste management plan which includes details of how refuse is to be collected from the site. Reason: To ensure that the development does not prejudice the free flow of traffic or public safety along the neighbouring highway. 7. Residential Travel Plan	

Stakeholder	Question/Comment	Response
	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. c) The applicants are required to pay a sum of, £2,000 (two thousand pounds) per year per travel plan for five years £20,000 (twenty 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. 13. Section 278 (Highway Works) Agreement Prior to the first occupation of the development, the developer shall enter into an agreement with the Council as the Local Highway Authority under Section 278 of the Highways Act 1980 to undertake highway works comprising, new public realm scheme, cross over and footways works proposed on Clarendon Road. The applicant will be required to provide details designs for all associated works including a Stage 1 and Stage 2 Road Safety Audits being carried. Reason: To ensure the highway works are undertaken to high-level standards and in accordance with the Council's requirements. To enable the amendment of the Traffic	

Stakeholder	Question/Comment	Response
	Management Order enabling the reinstatement of on-street parking outside the site, as well as lining and signing works. <u>Conditions</u> 1. Service and delivery plan, the applicant will be required to submit a service and delivery plan which includes how refuse collections will be made by both the residential and commercial element of the development proposal. The plan must be submitted for approval before the development is occupied. Reason: To reduce the number of trips and reduce the impacts of the development proposal on the highways network.	
Carbon team	Carbon Management Response 10/05/2023 In preparing this consultation response, we have reviewed: • Energy Statement prepared by XCO2 (dated May 2023) • Overheating Risk Assessment prepared by XCO2 (dated 7 October 2022) • Sustainability/BREEAM Statement prepared by XCO2 (dated 19 October 2022) • Whole Life Cycle Carbon Assessment prepared by XCO2 (dated 17 October 2022) • Circular Economy Statement prepared by XCO2 (dated 17 October 2022) • Relevant supporting documents. 1. Summary The development achieves a reduction of 63.3% on site, which is supported in principle. The applicant should provide further clarifications with regards to the Energy Strategy and Overheating Strategy as mentioned in the following sections. Appropriate planning conditions will be recommended once this information has been provided.	Observations have been taken into account. Conditions and clauses in 106 recommended

Stakeholder	Question/Comment	Response																																																								
	2. Energy Strategy Policy SP4 of the Local Plan Strategic Policies, requires all new development to be zero carbon (i.e. a 100% improvement beyond Part L 2013). The London Plan (2021) further confirms this in Policy SI2. The overall predicted reduction in CO₂ emissions for the development shows an improvement of approximately 63.3% in carbon emissions with SAP10 carbon factors, from the Baseline development model (which is Part L 2013 compliant). This represents an annual saving of approximately 42.7 tonnes of CO₂ from a baseline of 67.5 tCO₂/year. London Plan Policy SI2 requires major development proposals to calculate and minimise unregulated carbon emissions, not covered by Building Regulations. The calculated unregulated emissions are: 30.8 tCO₂. <table><tr><th></th><th colspan="2">Residential</th><th colspan="2">Non-residential</th><th colspan="2">Site-wide</th></tr><tr><th><i>(SAP10 emission factors)</i></th><th>tCO₂</th><th>%</th><th>tCO₂</th><th>%</th><th>tCO₂</th><th>%</th></tr><tr><td>Baseline emissions</td><td>57.1</td><td></td><td>10.4</td><td></td><td>67.5</td><td></td></tr><tr><td>Be Lean savings</td><td>5.7</td><td>10%</td><td>4.0</td><td>38.6 %</td><td>9.7</td><td>14.3%</td></tr><tr><td>Be Clean savings</td><td>0.0</td><td>0%</td><td>0</td><td>0%</td><td>0.0</td><td>0%</td></tr><tr><td>Be Green savings</td><td>30.6</td><td>53.7 %</td><td>2.4</td><td>22.9 %</td><td>33.0</td><td>48.9%</td></tr><tr><td>Cumulative savings</td><td>36.3</td><td>63.6 %</td><td>6.4</td><td>61.4 %</td><td>42.7</td><td>63.3%</td></tr><tr><td>Carbon shortfall to offset (tCO₂)</td><td colspan="6">24.8</td></tr></table>		Residential		Non-residential		Site-wide		<i>(SAP10 emission factors)</i>	tCO ₂	%	tCO ₂	%	tCO ₂	%	Baseline emissions	57.1		10.4		67.5		Be Lean savings	5.7	10%	4.0	38.6 %	9.7	14.3%	Be Clean savings	0.0	0%	0	0%	0.0	0%	Be Green savings	30.6	53.7 %	2.4	22.9 %	33.0	48.9%	Cumulative savings	36.3	63.6 %	6.4	61.4 %	42.7	63.3%	Carbon shortfall to offset (tCO₂)	24.8						
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Stakeholder	Question/Comment		Response												
	Carbon offset contribution	£95 x 30 years x 24.8 tCO ₂ /year = £70,680													
	10% management fee	£7,068													
	Energy Use Intensity / Space Heating Demand Applications are required to report on the total Energy Use Intensity and Space Heating Demand, 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. The overall energy use intensity (EUI) of the proposed development is 448,040 kWh/year. The average proposed space heating demand is 29.59 kWh/m ² /year.														
	<table><tr><th>Building type</th><th>EUI (kWh/m²/year)</th><th>Space Heating Demand (kWh/m²/year)</th><th>Methodology used</th></tr><tr><td>Residential</td><td></td><td></td><td></td></tr><tr><td>Non-Residential</td><td></td><td></td><td></td></tr></table>			Building type	EUI (kWh/m ² /year)	Space Heating Demand (kWh/m ² /year)	Methodology used	Residential				Non-Residential			
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Residential															
Non-Residential															
<u>Actions:</u> - What is the calculated Energy Use Intensity (excluding renewable energy) for the residential and non-residential build? How does this perform against the GLA benchmarks, i.e. at 35 (residential) and 55 (non-residential) kWh/m2/year? Please re-submit the information in line with the GLA’s reporting template and specify the methodology used to calculate these figures. - What is the calculated space heating demand for the residential and non-residential build? How does this perform against the GLA benchmark of 15															

Stakeholder	Question/Comment	Response																											
	kWh/m2/year? Please submit the information in line with the GLA's reporting template and specify the methodology used to calculate these figures. Energy – Lean The applicant has proposed a site-wide saving of 9.7tCO₂ in emissions (14.3%) through improved energy efficiency standards in key elements of the build, based on SAP10 carbon factors. A total of 5.7 tCO₂ (10%) and 4.0 tCO₂ (38.6%) reduction of emissions are proposed for residential and non-residential part of the development respectively. This goes beyond the minimum 10% and 15% reduction for residential and non-residential development respectively set in London Plan Policy SI2, so this is supported. The following u-values, g-values and air tightness are proposed: <table border="1"> <thead> <tr> <th>Elements:</th><th>Residential</th><th>Non-Residential</th></tr> </thead> <tbody> <tr> <td>Floor u-value</td><td>0.10 W/m²K</td><td>0.10 W/m²K</td></tr> <tr> <td>External wall u-value</td><td>0.15 W/m²K</td><td>0.15 W/m²K</td></tr> <tr> <td>Roof u-value</td><td>0.10 W/m²K</td><td>0.10 W/m²K</td></tr> <tr> <td>Door u-value</td><td>1.30 W/m²K</td><td>1.20 W/m²K</td></tr> <tr> <td>Window u-value</td><td>1.20 W/m²K</td><td>1.20 W/m²K</td></tr> <tr> <td>G-value</td><td>0.50</td><td>0.40</td></tr> <tr> <td>Air permeability rate</td><td>3 m³/hm² @ 50Pa</td><td>2.5 m³/hm² @ 50Pa</td></tr> <tr> <td>Ventilation strategy</td><td>Mechanical ventilation with</td><td>Mechanical ventilation with heat recovery (MVHR 80% efficiency; 0.8 W/l/s</td></tr> </tbody> </table>	Elements:	Residential	Non-Residential	Floor u-value	0.10 W/m ² K	0.10 W/m ² K	External wall u-value	0.15 W/m ² K	0.15 W/m ² K	Roof u-value	0.10 W/m ² K	0.10 W/m ² K	Door u-value	1.30 W/m ² K	1.20 W/m ² K	Window u-value	1.20 W/m ² K	1.20 W/m ² K	G-value	0.50	0.40	Air permeability rate	3 m ³ /hm ² @ 50Pa	2.5 m ³ /hm ² @ 50Pa	Ventilation strategy	Mechanical ventilation with	Mechanical ventilation with heat recovery (MVHR 80% efficiency; 0.8 W/l/s	
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Stakeholder	Question/Comment			Response
		heat recovery (MVHR 95% efficiency; Specific Fan Power)	Specific Fan Power)	
	Thermal bridging	TBC	TBC	
	Low energy lighting	100%	100%	
	Heating system (efficiency / emitter)	Gas boiler with 90% efficiency	Gas boiler with 90% efficiency	
	Thermal mass	TBC	TBC	
	Improvement from the target fabric energy efficiency (TFEE)	21.4% improvement, from 53.9 to 42.4 kWh/m2.yr		
	<u>Actions:</u> - Please identify on a plan where the MVHR units will be located within the dwellings. The units should be less than 2m away from external walls. This detail can also be conditioned. - The fabric efficiencies and thermal bridging should be improved upon to reduce heat losses. - What is the construction of the building and what is the assumed thermal mass?			

Stakeholder	Question/Comment	Response
	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 development is within 500 meters of a planned future DEN, so the development is expected to secure connection subject to demonstration of technical feasibility and financial viability. The applicant proposes a site-wide heat network utilising ASHP allowing future connection including a single point of connection, capped off connections to non-domestic spaces and a single plant room. The applicant will need to demonstrate that they will provide the following details prior to the commencement of construction: a) Buried pipe (dry and filled with nitrogen) to our specification from the GF plant room to a manhole at the boundary of their site and evidence of any obstructions in highway adjacent to connection point; b) A good quality network within the building – 60/40 F&R, <50W/dwelling losses from the network – ideally to an agreed standard in the S106; c) A clear plan for QA of the network post-design approval through to operation, based on CP1;	

Stakeholder	Question/Comment	Response
	d) A clear commercial strategy identifying who will sell energy to residents and how prices/quality of service will be set. <u>Actions:</u> – Please provide a Connection to the DEN scenario that shows the carbon reduction following the Energy Hierarchy, and state what carbon factor has been used. – Please submit a site plan showing the connection point at the edge of the site, location of a pipe between the connection point and plant room, and plant room layout and schematics. Energy – Green As part of the Be Green carbon reductions, all new developments must achieve a minimum reduction of 20% from on-site renewable energy generation to comply with Policy SP4. The application has reviewed the installation of various renewable technologies. The report concludes that air source heat pumps (ASHPs) and solar photovoltaic (PV) panels are the most viable options to deliver the Be Green requirement. A total of 27.7 tCO₂ (47.7%) reduction of emissions are proposed under Be Green measures. The solar array peak output would be 16.69 kWp, with 2.8 kWp attributed to commercial area and 13.89kWp to the residential, which is estimated to produce around 12,482 kWh of renewable electricity per year, equivalent to a reduction of 2.9 tCO₂/year. The array of panels of 83.45m² will cover the roof with a southern orientation. A communal air-to-water ASHP system (COP of 2.6) will provide hot water and heating to the residential spaces for 100% of the demand. Individual ASHP systems (COP heating 2.6 & cooling 6.0) will provide space heating, hot water and space cooling to	

Stakeholder	Question/Comment	Response
	the non-residential spaces for 100% of demand. In total the ASHP technology will save 30.4 tCO₂/year in the development. <u>Actions:</u> - Please provide some commentary on how the available roof space has been maximised to install solar PV. - A living roof should be installed under the solar PV, or if this is not feasible, the roof should be light coloured to reduce solar heat gains and the improve efficiency of the solar panels. - Please identify on the plans where the air source heat pumps will be located and how the units will be mitigated in terms of visual and noise impact. - What analysis has been undertaken to assess the costs to occupants at peak demand, and what alternative options were explored to meet some of the peak demand with other heating sources? - What thermal storage capacity will be provided within the plant room, and how much will be provided for the non-domestic spaces? Thermal storage capacity should be maximised to reduce the cost to generate heat during peak periods. Energy – Be Seen London Plan Policy SI2 requests all developments to ‘be seen’, to monitor, verify and report on energy performance. The GLA requires all major development proposals to report on their modelled and measured operational energy performance. This will improve transparency on energy usage on sites, reduce the performance gap between modelled and measured energy use, and provide the applicant, building managers and occupants clarity on the performance of the building, equipment, and renewable energy technologies. The applicant should install metering equipment on site, with sub-metering by dwelling & non-residential unit. A public display of energy usage and generation should also be provided in the main entrance area to raise awareness of residents and businesses.	

Stakeholder	Question/Comment	Response
	- Please confirm that sub-metering will be implemented for residential and commercial units. - What are the unregulated emissions and proposed demand-side response to reducing energy: smart grids, smart meters, battery storage? 3. Carbon Offset Contribution A carbon shortfall of 24.8 tCO₂/year remains (based on a low-carbon heating solution). The remaining carbon emissions will need to be offset at £95/tCO₂ over 30 years. A deferred carbon offset contribution mechanism will apply to this scheme as it is expected to connect to the DEN when this has been built. The applicant should present two carbon reduction table scenarios: • Scenario 1: Connection to the DEN scenario (residual tCO₂ over 30 years) • Scenario 2: Low-carbon alternative heating solution (residual tCO₂ over 30 years) <u>Action:</u> - Energy modelling of the two scenarios is needed to calculate the deferred carbon offset contribution. Please provide the energy modelling for these scenarios. 4. Overheating London Plan Policy SI4 requires developments to minimise adverse impacts on the urban heat island, reduce the potential for overheating and reduce reliance on air conditioning systems. Through careful design, layout, orientation, materials and incorporation of green infrastructure, designs must reduce overheating in line with the Cooling Hierarchy.	

Stakeholder	Question/Comment	Response																																				
	In accordance with the Energy Assessment Guidance, the applicant has undertaken a dynamic thermal modelling assessment in line with CIBSE TM59 and TM52 with TM49 weather files, and the cooling hierarchy has been followed in the design. The report has modelled 6 retail spaces and 42 habitable spaces including 26 habitable rooms (22 double bedroom and 4 single bedroom), 16 spaces (7no. 1-bed KLDs, 8no. 2-bed KLDs and 1no. 3-bed KLDs) and 1 corridor under the London Weather Centre files. The acoustic assessment has set out that all bedrooms are expected to experience increased risk of noise. Therefore, the TM59 criteria for predominantly mechanically ventilated dwellings apply (assuming windows need to remain closed). Results are listed in the table below. <u>Residential:</u> <table><tr><th></th><th>TM59 – criterion A (<3% hours of overheating)</th><th>TM59 – criterion B hours >26°C (pass <33 hours)</th><th>Number of habitable rooms pass TM59</th><th>Number of spaces pass TM52</th><th>Number of corridors pass</th></tr><tr><td>DSY1 2020s</td><td>42/42</td><td>26/26</td><td>26/26</td><td>16/16</td><td>1/1</td></tr><tr><td>DSY2 2020s</td><td>0/42</td><td>0/26</td><td>0/26</td><td>0/16</td><td>0/1</td></tr><tr><td>DSY3 2020s</td><td>0/42</td><td>0/26</td><td>0/26</td><td>0/16</td><td>0/1</td></tr><tr><td>DSY1 2050s</td><td>0/21</td><td>13/13</td><td>13/13</td><td>0/8</td><td>0/0</td></tr><tr><td>DSY1 2080s</td><td>1/21</td><td>8/13</td><td>1/8</td><td>0/13</td><td>0/0</td></tr></table>		TM59 – criterion A (<3% hours of overheating)	TM59 – criterion B hours >26°C (pass <33 hours)	Number of habitable rooms pass TM59	Number of spaces pass TM52	Number of corridors pass	DSY1 2020s	42/42	26/26	26/26	16/16	1/1	DSY2 2020s	0/42	0/26	0/26	0/16	0/1	DSY3 2020s	0/42	0/26	0/26	0/16	0/1	DSY1 2050s	0/21	13/13	13/13	0/8	0/0	DSY1 2080s	1/21	8/13	1/8	0/13	0/0	
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Stakeholder	Question/Comment				Response
	<u>Non-residential:</u>				
		Mechanical Ventilation	g-value	Design Change	Number of retail spaces pass TM5
	DSY1 2020s	10 l/s/p	0.5	Natural Ventilation	0/6
	DSY1 2020s	10 l/s/p	0.3	Trim cooling MVHR with cooling coil	6/6
	DSY2 2020s	20 l/s/p	0.25	Trim cooling MVHR with cooling coil	6/6
	DSY3 2020s	20 l/s/p	0.25	Trim cooling MVHR with cooling coil	6/6
	DSY1 2050s	20 l/s/p	0.25	Trim cooling MVHR with cooling coil	6/6
	DSY1 2080s	20 l/s/p	0.25	Active cooling MVHR	6/6
	All rooms pass the overheating requirements for 2020s DSY1. In order to pass this, the following measures will be built:				
	- Ensure a minimum opening equivalent areas of the windows as proposed in the Table 9 of the report. - Glazing g-value of 0.50 for all residential windows and glazed doors. - Use of internal shading devices e.g., curtains or blinds of low shading coefficient to be recommended to the future tenants. - External fins at level 1 - Natural ventilation option (but not for the purposes of the modelling) – side hung by 90 degrees, inward opening.				

Stakeholder	Question/Comment	Response
	- Corridors to have 10 L/s mechanical extract fans in AOV riser. - MVHR 'trim cooling' for all residential apartments In the event of overheating, residents should make use of their balconies or the communal outdoor space at Level 6. Proposed future mitigation measures include: - 800mm deep external shading (to achieve 1m in total) as a horizontal feature on south and south-west glazing - G-value of 0.40 - Higher flow rates from MVHR at night, and air conditioning for the 3-bedroom flats Further retrofit plans are suggested for the more extreme weather files: - Juliet balconies with railing to replace fixed glazing at the end of their life; - External automated blinds; - Ceiling fans on the dwellings; - Active cooling for 2080s weather file. <u>Overheating Actions:</u> - Why is the shading not proposed on higher levels? Why is it not integrated within the current design? - What heat loss has been assumed for the pipework? - How would the lower g-value be achieved? - To what extent MVHR is being taken into consideration? - Specify the shading strategy, including: technical specification and images of the proposed shading feature (e.g. overhangs, Brise Soleil, external shutters), elevations and sections showing where these measures are proposed. Internal blinds cannot be used to pass the weather files, but can form part of the delivered strategy to reduce overheating risk for occupants (as long as it does not compromise any ventilation requirements).	

Stakeholder	Question/Comment	Response
	- Specify the ventilation strategy, including: floorplans showing which habitable spaces will be predominantly naturally ventilated or mechanically ventilated, specification of the proposed mechanical ventilation (efficiency and air changes), window opening areas. - Specify the active cooling demand (space cooling, not energy used) on an area-weighted average in MJ/m² and MY/year? Please also confirm the efficiency of the equipment, whether the air is sourced from the coolest point / any renewable sources. - Confirm who will own the overheating risk when the building is occupied (not the residents). - This development should have a heatwave plan / building user guide to mitigate overheating risk for occupants. 5. Sustainability Policy DM21 of the Development Management Document requires developments to demonstrate sustainable design, layout and construction techniques. The sustainability section in the report sets out the proposed measures to improve the sustainability of the scheme, including transport, health and wellbeing, materials and waste, water consumption, flood risk and drainage, biodiversity, climate resilience, energy and CO2 emissions and landscape design. The applicant proposes 100% of the timber used during construction to be sourced from accredited Forest Stewardship Council (FSC) or Programme for the Endorsement of forestry Certification (PEFC) source. Sustainable urban drainage systems (SUDS) is proposed, comprising blue roofs and below ground attenuation tanks incorporated on site. The discharge rate from the development to be restricted and achieving an 84.2% reduction on existing peak flows for the 100-year storm event. <i>Non-Domestic BREEAM Requirement</i>	

Stakeholder	Question/Comment	Response
	Policy SP4 requires all new non-residential developments to achieve a BREEAM rating 'Very Good' (or equivalent), although developments should aim to achieve 'Excellent' where achievable. The applicant has prepared a BREEAM Pre-Assessment Report for the commercial portion of the development. Based on this report, a score of 65.94% is expected to be achieved, equivalent to 'Very Good' rating. <u>Actions:</u> - The submitted table should specify which targets could be achieved and which will not be met. This needs to include justification where targets are not met or 'potential' credits (where they are available under the Shell and Core assessment). This will enable better assessment of which credits. <i>Urban Greening / Biodiversity</i> All development sites must incorporate urban greening within their fundamental design and submit an Urban Greening Factor Statement, in line with London Plan Policy G5. London Plan Policy G6 and Local Plan Policy DM21 require proposals to manage impacts on biodiversity and aim to secure a biodiversity net gain. Additional greening should be provided through high-quality, durable measures that contribute to London's biodiversity and mitigate the urban heat island impact. This should include tree planting, shrubs, hedges, living roofs, and urban food growing. Specifically, living roofs and walls are encouraged in the London Plan. Amongst other benefits, these will increase biodiversity and reduce surface water runoff. The development aims to achieves an Urban Greening Factor of 0.4 in line with Policy G5 of the London Plan for residential-led sites. <u>Actions:</u> - Provide Urban Greening Factor calculation showing it achieves the minimum 0.4 for residential-led sites.	

Stakeholder	Question/Comment	Response								
	- Provide the Biodiversity Net Gain calculation. <i>Living roofs</i> All development sites must incorporate urban greening within their fundamental design, in line with London Plan Policy G5. The development is proposing living roofs in the development. All landscaping proposals and living roofs should stimulate a variety of planting species. Mat-based, sedum systems are discouraged as they retain less rainfall and deliver limited biodiversity advantages. The growing medium for extensive roofs must be 120-150mm deep, and at least 250mm deep for intensive roofs (these are often roof-level amenity spaces) to ensure most plant species can establish and thrive and can withstand periods of drought. Living walls should be rooted in the ground with sufficient substrate depth. Living roofs are supported in principle, subject to detailed design. Details for living roofs will need to be submitted as part of a planning condition. <i>Whole Life-Cycle Carbon Assessments</i> Policy SI2 requires developments referable to the Mayor of London to submit a Whole Life-Cycle Carbon Assessment and demonstrate actions undertaken to reduce life-cycle emissions. The total calculated emissions based on the GIA (without grid decarbonisation) is estimated at: <table><tr><td></td><td>Estimated carbon emissions</td><td>GLA benchmark RESIDENTIAL</td><td>Embodied carbon rating (Industry-wide)</td></tr><tr><td>Product & Construction</td><td>633 kgCO₂e/m²</td><td>Meets GLA benchmark (<850 kgCO₂e/m²) but</td><td>Modules A1-A5 achieve a band</td></tr></table>		Estimated carbon emissions	GLA benchmark RESIDENTIAL	Embodied carbon rating (Industry-wide)	Product & Construction	633 kgCO ₂ e/m ²	Meets GLA benchmark (<850 kgCO ₂ e/m ²) but	Modules A1-A5 achieve a band	
	Estimated carbon emissions	GLA benchmark RESIDENTIAL	Embodied carbon rating (Industry-wide)							
Product & Construction	633 kgCO ₂ e/m ²	Meets GLA benchmark (<850 kgCO ₂ e/m ²) but	Modules A1-A5 achieve a band							

Stakeholder	Question/Comment				Response
	Stages Modules A1-A5 (excl. sequestration)		misses the aspirational target (<500 kgCO ₂ e/m ²).	rating of 'D', not meeting the LETI 2020 Design Target.	
	Use and End-Of-Life Stages Modules B-C (excl. B6 and B7)	395 kgCO ₂ e/m ²	Does not meet GLA target (<350 kgCO ₂ e/m ²) and aspirational benchmark (<300 kgCO ₂ e/m ²).		
	Modules A-C (excl B6, B7 and incl. sequestration)	973 kgCO ₂ e/m ²	Meets GLA target (<1200 kgCO ₂ e/m ²) and the aspirational benchmark (<800 kgCO ₂ e/m ²).	Modules A1-B5, C1-4 (incl sequestration) achieve a letter band rating of 'D', not meeting the LETI 2020 Design Target.	
	Use and End-Of-Life Stages Modules B6 and B7	738 kgCO ₂ e/m ²	N/A		
	Reuse, Recovery, Recycling Stages Module D	150 kgCO ₂ e/m ²	N/A		
	This shows that the majority of carbon emissions (42%) are associated with Module B6-B7 with Module A1-A5 contributing the second highest amount at 36% of WLC emissions.				

Stakeholder	Question/Comment	Response
	The highest embodied carbon in Modules A1-A5 is attributed to the superstructure (65%) and substructure (24%). In Modules B-C (excl B6 & B7) the highest contributors in embodied carbon are superstructure (50%), internal finishes (29%) and the services (14%). A number of areas have been identified to calculate more accurately and to reduce the embodied carbon of the buildings. The GLA requested further actions to be taken on whole-life carbon, which we support. <i>Circular Economy</i> Policy SI7 requires applications referable to the Mayor of London to submit a Circular Economy Statement demonstrating how it promotes a circular economy within the design and aim to be net zero waste. Haringey Policy SP6 requires developments to seek to minimise waste creation and increase recycling rates, address waste as a resource and requires major applications to submit Site Waste Management Plans. The principles used for this development are: - Building in Layers - Designing Out Waste - Designing for longevity, circa 50 years of building life, and disassembly at end of life - Designing for flexibility and adaptability - Design for Disassembly - Using Systems, Elements or Materials that can be Reused and Recycled The report sets Circular Economy Design Out Waste (Table 2-5), Design for Longevity (Table 6), Designing for adaptability or flexibility (Table 7), Strategies to promote the use of reusable or recyclable systems, elements or materials (Table 9), key commitments and implementation plan (Table 12). This is a fairly high level of	

Stakeholder	Question/Comment	Response
	information, and the applicant expects this to become more detailed as the detailed design progresses following permission. The GLA requested further actions to be taken on Circular Economy, which we support. 6. Planning Obligations Heads of Terms - Be Seen commitment to uploading energy data - Energy Plan - Sustainability Review - Estimated carbon offset contribution (and associated obligations) of £70,680 (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. - DEN connection (and associated obligations) - Heating strategy fall-back option if not connecting to the DEN 7. Planning Conditions To be secured, however amendments are expected to be submitted and outstanding items resolved before the conditions can be drafted. Carbon Management Response 17/05/2023 In preparing this consultation response, we have reviewed: • Energy Statement prepared by XCO2 (dated 11th May 2023) • Overheating Risk Assessment prepared by XCO2 (dated 15th May 2023) • BREEAM Summary of Performance & Rating dated 24th May 2023 • Biodiversity New Gain Calculation prepared by Ecology and Land Management (dated October 2022) • Basement Level Plans including District Heating. • Relevant supporting documents.	

Stakeholder	Question/Comment	Response												
	1. Summary The development achieves a reduction of 63.3% on site, which is supported. 2. Energy Strategy Energy Use Intensity / Space Heating Demand The energy use intensity (EUI) and space heating demand of the proposed development is as follows: <table><tr><th>Building type</th><th>EUI (kWh/m²/year)</th><th>Space Heating Demand (kWh/m²/year)</th><th>Methodology used</th></tr><tr><td>Residential</td><td>111.2</td><td>34.1</td><td>Part L Calculation (SAP)</td></tr><tr><td>Non-Residential</td><td>54.8</td><td>1.2</td><td>Part L Calculation (BRUKL)</td></tr></table> The applicant has clarified that the scheme has gone beyond the Building Regulations Part L 2013 and 2021 standards, low thermal bridging y-values and efficient MVHR systems. It is recommended to explore more options to decrease the Energy Use Intensity. Energy – Lean The applicant has proposed to meet and exceed the Part L 2013 thermal bridging y-value target of 0.15 by achieving a value of 0.08-0.10. An indicative thermal mass parameter of 250 kJ/m2K has been applied to all dwellings, this is based on a proposed steel frame construction with brick façade. The detail of MVHR is requested to be conditioned.	Building type	EUI (kWh/m ² /year)	Space Heating Demand (kWh/m ² /year)	Methodology used	Residential	111.2	34.1	Part L Calculation (SAP)	Non-Residential	54.8	1.2	Part L Calculation (BRUKL)	
Building type	EUI (kWh/m ² /year)	Space Heating Demand (kWh/m ² /year)	Methodology used											
Residential	111.2	34.1	Part L Calculation (SAP)											
Non-Residential	54.8	1.2	Part L Calculation (BRUKL)											

Stakeholder	Question/Comment	Response
	Energy – Clean Applicant to provide the following information on DEN in later stage. The applicant will need to demonstrate that they will provide the following details prior to the commencement of construction: e) Buried pipe (dry and filled with nitrogen) to our specification from the GF plant room to a manhole at the boundary of their site and evidence of any obstructions in highway adjacent to connection point; f) A good quality network within the building – 60/40 F&R, <50W/dwelling losses from the network – ideally to an agreed standard in the S106; g) A clear plan for QA of the network post-design approval through to operation, based on CP1; h) A clear commercial strategy identifying who will sell energy to residents and how prices/quality of service will be set. In order to calculate the carbon-offset a connection to DEN scenario must be calculated. The site plan that shows the connection point and the location between the connection point and plant room is required. <u>Actions:</u> – Please provide a Connection to the DEN scenario that shows the carbon reduction following the Energy Hierarchy, and state what carbon factor has been used. This can be conditioned. Energy – Green The development does not propose living roofs to minimise the distance between PV arrays maximising the overall on-site renewable energy generation. The roof area is proposed to be painted in a light colour to minimise the temperature of the areas below the panels.	

Stakeholder	Question/Comment	Response
	The ASHP units is proposed at roof level as per the plan in appendix H of the energy statement, and acoustic attenuation is proposed to minimise noise and sheltering of the units to minimise their visual impact. Smart energy meters are proposed as part of the proposed scheme. The feasibility to incorporate demand side flexibility measures is proposed to be explored at the next stages. The applicant proposed to confirm the technical details of thermal stores during the technical design stage. Energy – Be Seen The applicant confirms a monitoring strategy to be put in place ensuring monitoring and reporting of the actual energy performance of the development post-occupation which will include sub-metering for both the domestic and non-domestic spaces individually. 3. Carbon Offset Contribution A carbon shortfall of 24.8 tCO₂/year remains (based on a low-carbon heating solution). The remaining carbon emissions will need to be offset at £95/tCO₂ over 30 years. A deferred carbon offset contribution mechanism will apply to this scheme as it is expected to connect to the DEN when this has been built. The applicant should present two carbon reduction table scenarios: • Scenario 1: Connection to the DEN scenario (residual tCO₂ over 30 years) • Scenario 2: Low-carbon alternative heating solution (residual tCO₂ over 30 years) <u>Action:</u>	

Stakeholder	Question/Comment	Response
	- Energy modelling of the two scenarios is needed to calculate the deferred carbon offset contribution. Please provide the energy modelling for these scenarios. This can be conditioned. 4. Overheating An updated overheating assessment is submitted which follows the cooling hierarchy which includes external shading, lower g-value and cooling coil capacity as mitigation measures consecutively. The report has modelled all south and west facing windows including a 500mm overhang, plus all west facing windows including an additional 500mm side fin to the south side. These mitigation proposals have reduced the number of overheating hours by approximately 5%. The applicant has confirmed that the model accounts for 12.19 W/m heat loss per metre run of pipe. The MVHR system is proposed for all dwelling with a trim-cooling capacity of 2.2kW for the largest 3-bed flats and be able to provide constant air at 18.9°C with a flow rate of 60/90/120 l/s for the 1Bed/2Bed/3Bed respectively, for the whole flat. The efficiency and air changes of the proposed mechanical ventilation are as follows: Balanced whole flat MVHR: 0.7 (70%) heat recovery efficiency. SFP (1/2/3 wet rooms) = 0.42 / 0.50 / 0.61 W/l.s, respectively. Air source heat pumps (ASHP) is proposed for both heating and cooling of the non-residential portions of the development (e.g., for the 3 no. commercial units at ground level). The specification of the proposed ASHP is COP = 2.6 / EER = 6.0. Applicant confirms to provide building user guide or a formal heatwave plan at later stage and requests to condition this.	

Stakeholder	Question/Comment	Response
	5. Sustainability <i>Non-Domestic BREEAM Requirement</i> The applicant has prepared a BREEAM Pre-Assessment Report for the commercial portion of the development. Based on this report, a score of 64.72% is expected to be achieved, equivalent to 'Very Good' rating and a potential score of 72.47% can be achieved, equivalent to 'Excellent' rating. <i>Urban Greening / Biodiversity</i> The development aims to achieves an Urban Greening Factor of 0.431 in line with Policy G5 of the London Plan for residential-led sites. The bio-diversity net gain calculation is submitted which shows that the development will make a net contribution of habitat biodiversity units of 431.26% and a net loss of linear biodiversity units of -100%. <i>Living roofs</i> Living roofs are supported in principle, subject to detailed design. Details for living roofs will need to be submitted as part of a planning condition. <i>Whole Life-Cycle Carbon Assessments</i> The GLA requested further actions to be taken on whole-life carbon, which we support. <i>Circular Economy</i> The GLA requested further actions to be taken on Circular Economy, which we support. 6. Planning Obligations Heads of Terms - Be Seen commitment to uploading energy data - Energy Plan	

Stakeholder	Question/Comment	Response
	- Sustainability Review - Estimated carbon offset contribution (and associated obligations) of £70,680 (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. - DEN connection (and associated obligations) - Heating strategy fall-back option if not connecting to the DEN 7. Planning Conditions To be secured: <u>Energy strategy:</u> <i>The development hereby approved shall be constructed in accordance with the Energy Statement prepared by XCO2 (dated May 2023) delivering a minimum 63.3% improvement on carbon emissions over 2013 Building Regulations Part L, with SAP10 emission factors, high fabric efficiencies, communal ASHP and future connection to the Decentralised Energy Network, and a minimum 16.69kWp solar photovoltaic (PV) array.</i> <i>(a) Prior to above ground construction, a revised Energy Strategy shall be submitted to and approved by the Local Planning Authority. This must include:</i> - <i>Carbon reduction following the energy hierarchy for future connection to DEN and ASHP scenario;</i> - <i>Confirmation of how this development will meet the zero-carbon policy requirement in line with the Energy Hierarchy;</i> - <i>Confirmation of the necessary fabric efficiencies to achieve a minimum 10% reduction with SAP10 carbon factors;</i> - <i>Details to reduce thermal bridging;</i> - <i>Location, specification and efficiency of the proposed ASHP system (Coefficient of Performance, Seasonal Coefficient of Performance, and the Seasonal Performance Factor), with plans showing the ASHP pipework and noise and visual mitigation measures;</i>	

Stakeholder	Question/Comment	Response
	- <i>Specification and efficiency of the proposed Mechanical Ventilation and Heat Recovery (MVHR), with plans showing the rigid MVHR ducting and location of the unit;</i> - <i>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 how the energy will be used on-site before exporting to the grid;</i> - <i>Specification of any additional equipment installed to reduce carbon emissions;</i> - <i>A metering strategy</i> <i>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. The solar PV array shall be installed with monitoring equipment prior to completion and shall be maintained at least annually thereafter.</i> <i>(b) The solar PV arrays 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.</i> <i>(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.</i> <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>	

Stakeholder	Question/Comment	Response
	<u>DEN Connection:</u> <i>Prior to the above ground commencement of construction work, details relating to the future connection to the DEN must be submitted to and approved by the local planning authority. This shall include:</i> <i>• Further detail of how the developer will ensure the performance of the DEN system will be safeguarded through later stages of design (e.g. value engineering proposals by installers), construction and commissioning including provision of key information on system performance required by CoP1 (e.g. joint weld and HIU commissioning certificates, CoP1 checklists, etc.);</i> <i>• Peak heat load calculations in accordance with CIBSE CP1 Heat Networks: Code of Practice for the UK (2020) taking account of diversification.</i> <i>• Detail of the pipe design, pipe sizes and lengths (taking account of flow and return temperatures and diversification), insulation and calculated heat loss from the pipes in Watts, demonstrating heat losses have been minimised together with analysis of stress/expansion;</i> <i>• A before and after floor plan showing how the plant room can accommodate a heat substation for future DEN connection. The heat substation shall be sized to meet the peak heat load of the site. The drawings should cover details of the phasing including any plant that needs to be removed or relocated and access routes for installation of the heat substation;</i> <i>• Details of the route for the primary pipework from the energy centre to a point of connection at the site boundary including evidence that the point of connection is accessible by the area wide DEN, detailed proposals for installation for the route that shall be coordinated with existing and services, and plans and sections showing the route for three 100mm diameter communications ducts;</i> <i>• Details of the location for building entry including dimensions, isolation points, coordination with existing services and detail of flushing/seals;</i>	

Stakeholder	Question/Comment	Response
	• <i>Details of the location for the set down of a temporary plant to provide heat to the development in case of an interruption to the DEN supply including confirmation that the structural load bearing of the temporary boiler location is adequate for the temporary plant and identify the area/route available for a flue;</i> • <i>Details of a future pipework route from the temporary boiler location to the plant room.</i> <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 SI3, and Local Plan (2017) Policies SP4 and DM22.</i> <u>Overheating</u> <i>Prior to the above ground commencement of the development, revised Overheating Report shall be submitted to and approved by the Local Planning Authority. The submission shall assess the overheating risk and propose a retrofit plan. This assessment shall be based on the TM52 and TM59 Overheating modelling undertaken by XCO2 (Overheating Risk Assessment dated 15th May 2023).</i> <i>This report shall include:</i> - <i>Revised modelling of units modelled based on CIBSE TM52/59, using the CIBSE TM49 London Weather Centre files for the DSY1-3 (2020s) and DSY1 2050s and 2080s, high emissions, 50% percentile;</i> - <i>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 distribution heat losses, external shading, crime, noise and air quality issues are assessed and mitigated appropriately evidenced by the proposed location and specification of measures;</i>	

Stakeholder	Question/Comment	Response
	- <i>Modelling of mitigation measures required to pass future weather files including external shading, clearly setting out which measures will be delivered before occupation and which measures will form part of the retrofit plan;</i> - <i>Confirmation that the retrofit measures can be integrated within the design (e.g., if there is space for pipework to allow the retrofitting of ventilation equipment), setting out mitigation measures in line with the Cooling Hierarchy;</i> - <i>Confirmation who will be responsible to mitigate the overheating risk once the development is occupied.</i> <i>(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.</i> <i>(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:</i> - <i>Natural ventilation with fully inward openable windows;</i> - <i>Infiltration rate of 0.15 ACH</i> - <i>Window g-values of 0.4;</i> - <i>External shading – overhangs and side fins;</i> - <i>Mechanical ventilation with summer bypass (40l/s);</i> - <i>Hot water pipes insulated to high standards.</i> - <i>Any further mitigation measures as approved by or superseded by the latest approved Overheating Strategy.</i> <i>Active cooling is not permitted in this development.</i>	

Stakeholder	Question/Comment	Response
	<i>If the design of Blocks is amended, or the heat network pipes will result in higher heat losses and will impact on the overheating risk of any units, a revised Overheating Strategy must be submitted as part of the amendment application.</i> <i>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.</i> <u>Overheating Building User Guide</u> <i>Prior to occupation of the residential dwellings, a Building User Guide for new residential occupants shall be submitted in writing to and for approval by the Local Planning Authority. The Building User Guide will advise residents how to operate their property during a heatwave, setting out a cooling hierarchy in accordance with London Plan (2021) Policy SI4 with passive measures being considered ahead of cooling systems. The Building User Guide will be issued to residential occupants upon first occupation.</i> <i>Reason: In the interest of reducing the impacts of climate change and mitigation of overheating risk, in accordance with London Plan (2021) Policy SI4, and Local Plan (2017) Policies SP4 and DM21.</i> <u>BREEAM Certificates</u> <i>(a) Prior to commencement on site, a design stage accreditation certificate for every type of non-residential category must be submitted to the Local Planning Authority confirming that the development will achieve a BREEAM “Very Good” outcome (or equivalent), aiming for “Excellent”. This should be accompanied by a tracker demonstrating which credits are being targeted, and why other credits cannot be met on site.</i>	

Stakeholder	Question/Comment	Response
	<i>The development shall then be constructed in strict accordance with the details so approved, shall achieve the agreed rating and shall be maintained as such thereafter for the lifetime of the development.</i> <i>(b) Prior to occupation, a post-construction certificate issued by the Building Research Establishment must be submitted to the local authority for approval, confirming this standard has been achieved.</i> <i>In the event that the development fails to achieve the agreed rating for the development, a full schedule and costings of remedial works required to achieve this rating shall be submitted for our written approval with 2 months of the submission of the post construction certificate. Thereafter the schedule of remedial works must be implemented on site within 3 months of the Local Authority's approval of the schedule, or the full costs and management fees given to the Council for offsite remedial actions.</i> <i>Reason: In the interest of addressing climate change and securing sustainable development in accordance with London Plan (2021) Policies SI2, SI3 and SI4, and Local Plan (2017) Policies SP4 and DM21.</i> <u>Living roof(s)</u> <i>(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> <i>i) A roof plan identifying where the living roofs will be located;</i>	

Stakeholder	Question/Comment	Response
	<i>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);</i> <i>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</i> <i>iv) Details of the proposed type of invertebrate habitat structures with a minimum of one feature per 30m² 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 1m², rope coils, pebble mounds of water trays;</i> <i>v) Details on the range and seed spread of native species of (wild)flowers and herbs (minimum 10g/m²) and density of plug plants planted (minimum 20/m² with root ball of plugs 25cm³) 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);</i> <i>vi) Roof plans and sections showing the relationship between the living roof areas and photovoltaic array; and</i> <i>vii) Management and maintenance plan, including frequency of watering arrangements.</i> <i>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;</i> <i>(b) Prior to the occupation of 90% of the development, evidence must be submitted to and approved by the Local Planning Authority that the living roofs have been delivered in line with the details set out in point (a). This evidence shall include photographs demonstrating the measured depth of substrate, planting and biodiversity measures. If the Local Planning Authority finds that the living roofs have not been delivered to the approved standards, the applicant shall rectify this to ensure it complies with the</i>	

Stakeholder	Question/Comment	Response
	<i>condition. The living roofs shall be retained thereafter for the lifetime of the development in accordance with the approved management arrangements.</i> <i>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.</i> <u>Circular Economy (Post-Completion report)</u> <i>Prior to the occupation of development, a Post-Construction Monitoring Report should be completed in line with the GLA's Circular Economy Statement Guidance.</i> <i>The relevant Circular Economy Statement shall be submitted to the GLA at: circulareconomystatements@london.gov.uk, along with any supporting evidence as per the guidance. Confirmation of submission to the GLA shall be submitted to, and approved in writing by, the Local Planning Authority, prior to the occupation of development.</i> <i>Reason: In the interests of sustainable waste management and in order to maximise the re-use of materials in accordance with London Plan (2021) Policies D3, SI2 and SI7, and Local Plan (2017) Policies SP4, SP6, and DM21.</i> <u>Whole-Life Carbon</u> <i>Prior to the occupation of each building, the post-construction tab of the GLA's Whole Life Carbon Assessment template should be completed in line with the GLA's Whole Life Carbon Assessment Guidance. The post-construction assessment should provide an update of the information submitted at planning submission stage. This should be submitted to the GLA at: ZeroCarbonPlanning@london.gov.uk, along with any supporting evidence as per the guidance. Confirmation of submission to the GLA shall</i>	

Stakeholder	Question/Comment	Response
	<i>be submitted to, and approved in writing by, the Local Planning Authority, prior to occupation of the relevant building.</i> <i>Reason: In the interests of sustainable development and to maximise on-site carbon dioxide savings in accordance with London Plan (2021) Policy SI2, and Local Plan (2017) Policies SP4 and DM21.</i> <u>Biodiversity</u> <i>(a) Prior to the commencement of development, details of ecological enhancement measures and ecological protection measures shall be submitted to and approved in writing by the Council. This shall detail the biodiversity net gain, 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.</i> <i>(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.</i> <i>Development shall accord with the details as approved and retained for the lifetime of the development.</i> <i>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.</i>	

Stakeholder	Question/Comment	Response
Waste Management Team	Officers comments dated 12 December 2022 I've looked at the details of this proposed development at 30-36, Clarendon Road Off Hornsey Park Road, Wood Green, London, N8 0DJ. The number of household waste and recycling containers for the development are very slightly lower than calculated as they have been rounded down rather than up which I would advise against. We can't collect food waste from anything other than 140 litre bins as it is too heavy in larger containers although I appreciate this isn't reflected in the current guidance. Also from our perspective there is no requirement for waste and recycling from affordable housing and that for private rent or sale to be separated, being both from domestic sources. It may be more convenient to have one single waste / recycling storage room for domestic waste but this is at the developer's discretion. The only waste we would expect to be stored separately from residential is commercial waste and recycling and this is included as part of the development. The bin storage areas for all waste types are on the ground floor and accessible for servicing purposes. Officers comments dated 15 March 2023 Thank you for your email and for letting me know about the changes to refuse strategy and bin provision. I note they have now been amended to 140 litre food waste bins and include an additional recycling bin as well as the reconfiguration of the commercial and residential bin storage facilities. Based on these changes I don't have any further comments but please let me know if there is anything else you need to check concerning waste and recycling.	Comments noted
Building Control	I can confirm that the BiA provided for this scheme, meets the policy requirements subject to the following information being provided:	Comments noted.

Stakeholder	Question/Comment	Response
	1 Soil investigation from the site itself; 2 Unexploded (UXO) bombs survey; and 3 Ground movement assessment and effect on adjoining structures (including the method of monitoring).	Conditions included
Building Control	Fire Safety matters to be considered by the HSE under Gateway 1. A full detailed check of the fire strategy to be carried out on the submission to Building Control, or through the HSE, if submitted at a later date through the Gateway regime.	
Flood & Water Management Lead	Having reviewed the applicant's submitted: 1) Flood Risk Assessment and SuDS main Report Part 1, Version 2 dated October 2022 2) Flood Risk Assessment and SuDS Appendices Part 2, dated October 2022 3) Blue Roof Area for SuDS Strategy Drawing reference number 221070-GSL-ZZ-XX-SK-C-0003 Version 02 dated 11th October 2022 4) Exceedance Flow Plan reference number 221070-GSL-ZZ-XX-SK-C-0002, version 01, dated 11th October 2022 5) Preliminary Drainage Layout drawing reference number 221070-GSL-ZZ-XX-SK-C-0001, version 01, dated 11th October 2022 along with 6) SuDS Maintenance plan reference number 220170-GSL-XX-XX-RP-C-0001 dated October 2022 as prepared by Graphics Structures Consultant, we have no further comments to make on the above application. We are content that the impact of surface water drainage have been addressed adequately.	Comments noted.

Stakeholder	Question/Comment	Response
Pollution	<u>Re: Planning Application HGY/2022/3846 at 30-36, Clarendon Road Off Hornsey Park Road, Wood Green, London, N8 0DJ.</u> Thanks for contacting the Carbon Management Team (Pollution) regarding the above planning application for the demolition of the existing buildings and construction of a part two, six, eight and eleven storey building plus basement mixed use development comprising 51 residential units and 560 sqm of commercial floor space, with access, parking and landscaping and I will like to comment as follows. Having considered the applicant submitted design and access statement dated October 2022, Air Quality Assessment prepared by The PES Ltd dated 22nd September 2022 taken sections 5 (Baseline Air Quality), 6 (Potential Impacts), 7 (Air Quality Neutral Assessment), 8 (Mitigation) and 9 (Summary & Conclusions), Desk Study & Basement Impact Assessment Report with reference J20293 prepared by GEA Ltd dated December 2020 taken note of sections 2 (The Site), 3 (Screening Assessment), 4 (Scoping Assessment), 5 (Basement Impact Assessment), 6 (Development Issues) and 7 (Conclusions) and Energy Statement produced by XC02 dated October 2022 with the proposed use of PV panels and ASHP, please be advise that we have no objection to the proposed development in relation to AQ and Land Contamination but the following planning conditions and informative are recommend should planning permission be granted considering the nature of the proposed development. 1. <u>Land Contamination</u> Before development commences other than for investigative work: - Using the information already submitted in the Desk Study & Basement Impact Assessment Report with reference J20293 prepared by GEA Ltd dated December 2020, 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. - 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. - Where remediation of contamination on the site is required, completion of the remediation detailed in the method statement shall be carried out and; - A report that provides verification that the required works have been carried out, shall be submitted to, and approved in writing by the Local Planning Authority before the development is occupied. <u>Reason:</u> To ensure the development can be implemented and occupied with adequate regard for environmental and public safety. 2. <u>Unexpected Contamination</u> 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	Comments noted Conditions included

	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. 1. Updated Air Quality Assessment Whilst the submitted Air Quality Assessment report prepared by The PES Ltd dated 22nd September 2022 is noted however, considering the distance of the proposed development to the monitoring sites used as baselines not fully representative of the development site and the fact that we have many and new closer monitoring locations in our latest AQ annual status report 2022 which the applicant has failed to consider, and the likely operational effect of the (B) road on the proposed development occupiers, an updated AQ assessment will need to be conducted so as to determine the actual existing baseline concentration in other to know the level of mitigation that will be required for the various floors of the development. Moreover, whilst we also take note of the use of Photovoltaic Panels (PV) and Air Source Heat Pump (ASHP) as the source of energy for the proposed development, the applicant will need to undertake a revised AQ Neutral Assessment which is based on the number of car trips generated by different land-use classes, together with the associated trip lengths and vehicle emission rates for the road transport emission and the annual gas consumption for the boilers installed in the proposed building for the building emission except the applicant is in the position to confirm explicitly that the source of energy to all the planning use class (Residential and Commercial) will be PV panels and ASHP and the planning use class will only be residential. Otherwise, the current submission of the applicant on the AQ Neutral Assessment is vague and need to be re-calculated. Therefore, in order to minimise increased exposure to existing poor air quality and make provision to address local problems of air quality (particularly within Air Quality Management Areas (AQMAs) where development is likely to be used by large numbers of those particularly vulnerable to poor air quality, such as children or older people), • Applicant will need to provide us an addendum AQ assessment of the proposed development taken into consideration the likely operational impact on the development by its proximity to a busy road i.e. (B138) so as to be able to reach an informed decision on its significant effects on the proposed development site and the overall local air quality. • Actual baseline monitoring will need to be undertaken at or within the close proximity of the site itself rather than relying purely on baseline monitoring farther away from the site or Defra mapped background concentrations. • A revised Air Quality Neutral Assessment, taking into account emissions from the installation of any boilers, transport sources and all other sources of emissions within and outside the proposed development must be undertaken and submitted for approval Reason: To Comply with Policy 7.14 of the London Plan and the GLA SPG Sustainable Design and Construction. 2. 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.	Comments noted. Conditions included
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Reason: To protect local air quality and comply with Policy 7.14 of the London Plan and the GLA NRMM LEZ

3. **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 (July 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;
 - 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 of facilities such as concrete batching.
- d) The AQDMP will be in accordance with the Greater London Authority SPG Dust and Emissions Control (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 the event of Local Authority Inspection;
 - iv. An inventory of NRMM currently on site (machinery should be regularly serviced, and service logs kept 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.

Stakeholder	Question/Comment	Response
Housing	Summary Comments to the residential part of the proposed development only. The proposals have been amended following new guidance from the National Fire Chief Council's setting out the need for more than one staircase in new buildings of 18 metres or 7 storeys, as such comments from housing have been revised. Further amendments have been made tenure following comments last month and this is to reassess the plans following these amendments. The applicant seeks to provide 51 residential units – these are broken down by tenure as: • 9 low-cost rent units • 7 intermediate (for sale – shared ownership) units • 34 private for sale units Affordable housing provision The 9 low-cost rent units now proposed are: • 2x 1B2P • 1x 2B3P • 3x 2B4P • 2x 3B4P • 1x 3B5P The 7 intermediate (for sale – shared ownership) units proposed are: • 3x 1B2P • 2x 2B3P • 1x 2B4P • 1x 3B4P www.haringey.gov.uk	Comments noted

The 35 private units proposed are:

- 3x studio
- 14x 1B2P
- 6x 2B3P
- 12x 2B4P

Affordable housing provision

Together the low-cost affordable rent and intermediate units proposed provide 16 units out of the 51 units – these are classed as the affordable housing. This represents 31.3% of total units. However, *Haringey's Housing Strategy* sets out that affordable housing provision should be measured by habitable room. On this basis, the low-cost rent units provide 28 habitable rooms out of the total 132 habitable rooms which equates to 21.2% and the intermediate units provide 19 habitable rooms which equates to 14.4%. Combined this represents 35.6% affordable housing by habitable room. Whilst this is approaching compliance with *Haringey's Housing Strategy*, the proposal is shy of meeting the 40% affordable housing by habitable room overall borough target as set out in the Local Plan. If the scheme could move closer to this, we can provide further comment.

The private for sale units total 35 units of the 51 and represent 85 habitable rooms of the 132 habitable rooms across the proposed development, this equates to 64.4%.

Dwelling and tenure mix

On dwelling mix, the recommended mix for the affordable rented housing is:

10% 1 beds, 45% 2 beds, 45% 3 beds (10% 4 beds or more).

This application proposes 22.2% 1 beds, 44.4% 2 beds and 33.3% 3 beds. The low-cost rented provision is now much closer to Haringey's recommended mix and this sees the number of family-sized low-cost (social rent/affordable rent) homes for those in the most housing need increase. Whilst we do see a reduction from 10 units to 9, as family sized homes are the priority for the council, this change is welcome.

The recommended dwelling mix for the intermediate housing (for sale – shared ownership) is:

30% 1 beds, 60% 2 beds and 10% 3 beds.

This application proposes 42.9% 1 beds, 42.9% 2 beds and 14.2% 3 beds. The intermediate provision proposed is closer to meeting Haringey's recommended mix and provides a better balance from 1 to 3 beds homes.

Haringey wishes to see as high a proportion as possible of the new affordable homes being delivered as homes for general needs. The tenure split of the affordable housing provided in the borough should be 60% general needs low-cost social rented housing to 40% intermediate housing and be measured by habitable room. In this application, 59.6% is low-cost rented housing by habitable room versus 40.4% intermediate housing; this is therefore policy compliant.

For intermediate affordable housing, we strongly prefer London Living Rent, as this will generally be the more affordable intermediate product for Haringey residents, but Shared Ownership can be acceptable and is proposed here; in each case our intermediate housing policy applies.

Rents

The Council expects providers to ensure that all new affordable homes being developed are affordable for Haringey residents. For low-cost rented housing for general needs, the Council's preference is for Social Rent, however it recognises that the general needs homes delivered by most Registered Providers on schemes funded by the Mayor of London are likely to be at London Affordable Rent. Social Rent or London Affordable Rent would be acceptable for the affordable housing units. We await further details on this.

As already stated, we await further details around the intermediate (for sale – shared ownership) units proposed.

Wheelchair accessible units

The Design and Access Statement shows that there will be x5 wheelchair units – these are x1 1B2P flat and x1 3B5P flat in the affordable rented homes, these will be accessible and then there are x1 1B2P and x2 2B3P in the private for sale homes, these will be adaptable. This represents circa 10% of the development. It does not appear that there are any wheelchair M4 (3) units in the intermediate (for sale – shared ownership) homes, it would have been good to have the wheelchair adaptable and accessible units across all tenures. Haringey's position on wheelchair accessible units is set out in *Appendix C– Affordable and Specialist/Supported Housing Guidance* and states that “a minimum of 10% of all affordable homes should be wheelchair accessible, with an aspiration of 20%”.

Intermediate Housing Policy Statement

Finally, we would like to draw the applicants' attention to the following requirements relating to the pricing, allocation, letting, and marketing of the intermediate homes:

Pricing

The Council expects providers to ensure that all new affordable homes are genuinely affordable for Haringey residents.

The Council expects that Shared Ownership housing is priced so that net housing costs, including mortgage costs, rents, and service charges, should not exceed 40% of a household's net income.

As such, developers should be aware that Shared Ownership homes should be priced so that households with a maximum income of £40,000 for one- and two-bed properties, and £60,000 for larger properties will not spend more than 40% of their net income on mortgage costs, rents, and service charges.

To be clear, that 40% threshold relates to pricing and not to allocation and letting.

London Living Rent is required to be set at one third of average local household incomes.

Allocation and letting of London Living Rent and Shared Ownership homes

	The Council's Intermediate Housing Policy requires that homes for Shared Ownership and London Living Rent (LLR) are targeted at households with a maximum income of £40,000 for one- and two-bed properties, and £60,000 for larger properties. Applicants for Shared Ownership must be first-time buyers unless they are purchasing to move into a larger home to meet their household needs. LLR homes must be limited to applicants with a gross household income of less than £60,000. However, they must be targeted at households with a maximum income of £40,000 for one- and two-bed properties. The Council is clear that local residents should benefit from new affordable housing and requires the use of priorities and marketing bands set out in the attached policy and summarised below. Developers are asked to note that robust mechanisms will be put in place to monitor and enforce these. Priorities are set to allocate properties when a number of individuals who meet the eligibility criteria have expressed an interest, and are as follows: Priority One: •Haringey social housing tenants, including Housing Association tenants where Haringey has nominations rights to that property •Households on the housing register •Households who are required to move because of estate renewal, •Children of Haringey social housing tenants who are currently living with their parents Priority Two •Members of the armed forces •Applicants who live or work in the borough Priority Three •Any other applicants living or working in another London borough. Where several applicants are in the same priority band, precedence will be given to households on the lowest income who meet the affordability criteria, and then to the applicant who first expressed an interest in the property. <u>Marketing intermediate housing</u> The Council sets clear guidelines for the marketing of intermediate products in order to ensure that these priorities are achieved. The attached Intermediate Housing Policy requires that intermediate housing is marketed in a phased way, with those living or working in Haringey with a maximum annual income of £40,000 for 1 and 2 bed properties and £60,000 for larger properties being prioritised until three months after completion.	
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Stakeholder	Question/Comment	Response
Tree Officer	Comments dated 09 January 2023 I hold no initial objections, from an arboricultural point of view to the proposal. A tree survey has been submitted with the proposal. The report has been carried out by MJC Tree Services Ltd. and is dated 26th November 2020. The document has been carried out to British Standard 5837: 2012 Trees in relation to Design, Demolition and Construction- Recommendations and includes an Arboricultural Impact Assessment (AIA), Tree Protection Plan (TPP), Tree Constraints Plans, and Arboricultural Method Statements. I concur with much of the survey including the Tree Quality Classification. 14 trees have been identified for removal. The majority are low grade and replaceable trees. The plans show re planting of trees and shrubs. However, we will need to know the net gain of trees, proposed species, and aftercare programme to be planted as there is no Landscape Master plan. Providing the above information is provided, the tree survey has every statement, drawing, and site-specific arboricultural method statements conditioned, I do not see any major issues. Comments dated 20 January 2023 I have no objections to the submitted details with the updated tree survey. Providing this is conditioned I have no further issues.	Comment noted
Public Health	Thank you for the clarity and positive to see the entrance and lifts are accessible and inclusive to all tenures. No further comments from Public Health.	Comment noted

Stakeholder	Question/Comment	Response
EXTERNAL		
Thames Water	Waste Comments The proposed development is located within 15 metres of a strategic sewer. Thames Water requests the following condition to be added to any planning permission. "No piling shall take place until a PILING METHOD STATEMENT (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement." Reason: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to significantly impact / cause failure of local underground sewerage utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB With regard to SURFACE WATER drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water we would have no objection. Management of surface water from new developments should follow Policy SI 13 Sustainable drainage of the London Plan 2021. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. Should you require further information please refer to our website. https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes	Comments noted. Condition/Informative included

Stakeholder	Question/Comment	Response
	We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, testing and site remediation. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. Should the Local Planning Authority be minded to approve the planning application, Thames Water would like the following informative attached to the planning permission: "A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 020 3577 9483 or by emailing trade.effluent@thameswater.co.uk . Application forms should be completed on line via www.thameswater.co.uk. Please refer to the Wholesale; Business customers; Groundwater discharges section. Thames Water would advise that with regard to WASTE WATER NETWORK and SEWAGE TREATMENT WORKS infrastructure capacity, we would not have any objection to the above planning application, based on the information provided. Water Comments On the basis of information provided, Thames Water would advise that with regard to water network infrastructure capacity, we would not have any objection to the above planning application. Thames Water recommend the following informative be attached to this planning permission. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.	

Stakeholder	Question/Comment	Response
	The proposed development is located within 15m of our underground water assets and as such we would like the following informative attached to any approval granted. The proposed development is located within 15m of Thames Waters underground assets, as such the development could cause the assets to fail if appropriate measures are not taken. 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.	

Stakeholder	Question/Comment	Response
Secure Design By	<u>Re: Planning Application at:</u> 30-36 Clarendon Road, Off Hornsey Park Road, Wood Green, London, N8 0DJ <u>Proposal:</u> Demolition of the existing buildings and construction of an 11 storey plus basement mixed use development comprising 51 residential units and 560 m2 of commercial floor space, with access, parking and landscaping. Dear Haringey Planning, <u>Section 1 - Introduction:</u> Thank you for allowing us to comment on the above planning proposal. With reference to the above application we have had an opportunity to examine the details submitted and would like to offer the following comments, observations and recommendations. These are based on relevant information to this site (Please see Appendices), including my knowledge and experience as a Designing Out Crime Officer and as a Police Officer. It is in our professional opinion that crime prevention and community safety are material considerations because of the mixed use, complex design, layout and the sensitive location of the development. To ensure the delivery of a safer development in line with L.B. Haringey DMM4 and DMM5 (See Appendix), we have highlighted some of the main comments we have in relation to Crime Prevention (Appendices 1). We met with the original project Architects in March 2021 to discuss Crime Prevention and Secured by Design pre-application stage and discussed our concerns around the design and	Conditions included

layout of the development. Prior to the current application there has been no consultation with our department or subsequent mention of how the development intends to prevent crime when complete. There is no mention of crime prevention or Secured by Design in the Design and Access Statement referencing design out crime. In particular there is no mention how the developments fire strategy will compliment or conflict with the security strategy which will become a particular concern at RIBA Stage 4 and into the construction phase of the development.

We request that the developer contacts us at the earliest convenience to ensure that the development is designed to reduce crime at an early.

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

Whilst in principle we have no objections to the site, in light of the changes to the original design we have recommended the attaching of suitably worded conditions and an informative. The comments made can easily be mitigated early if the Architects ensure the ongoing dialogue with our department continues throughout the design and build process. This can be achieved by the below Secured by Design conditions being applied (Section 2). If the Conditions are applied, we request the completion of the relevant SBD application forms at the earliest opportunity.

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

Section 2 - Secured by Design Conditions and Informative:

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

Conditions:

A. Prior to the first occupation of each building or part of a building or use, a '**Secured by Design**' accreditation shall be obtained for such building or part of such building or use and thereafter all features are to be permanently retained. Accreditation must be achieved according to current and relevant Secured by Design guidelines at the time of above grade works of each building or phase of said development. Confirmation of the certification shall be submitted to and approved in writing by the Local Planning Authority.

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

B. The commercial aspects of the development must achieve the relevant **Secured by Design** certification at the final fitting stage, prior to the commencement of business and details shall be submitted to and approved, in writing, by the Local Planning Authority.

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

Informative:

The applicant must seek the continual advice of the Metropolitan Police Service Designing Out Crime Officers (DOCs) to achieve accreditation. The services of MPS DOCs are available **free of charge** and can be contacted via docmailbox.ne@met.police.uk or 0208 217 3813.

Stakeholder	Question/Comment	Response
	<u>Section 3 - Conclusion:</u> We would ask that our department's interest in this planning application is noted and that we are advised of the final Decision Notice, with attention drawn to any changes within the development and subsequent Condition that has been implemented with crime prevention, security and community safety in mind. Should the Planning Authority require clarification of any of the recommendations/comments given in the appendices please do not hesitate to contact us at the above office. Yours sincerely, Lee Warwick 1977CO Designing Out Crime Officer Metropolitan Police Service This report gives recommendations. Please note that Crime Prevention Advice and the information in this report does not constitute legal or other professional advice; it is given free and without the intention of creating a contract or without the intention of accepting any legal responsibility. It is based on the information supplied and current crime trends in the area. All other applicable health, safety and fire regulations should be adhered to.	

Stakeholder	Question/Comment	Response																
Health and Safety Executive	Advice to the local planning authority Advice to the local planning authority (LPA) from the Health and Safety Executive (HSE) as a statutory consultee for developments that include a relevant building. <table><tr><td>To LPA</td><td>Haringey</td></tr><tr><td>LPA planning ref no</td><td>HGY/2022/3846</td></tr><tr><td>Our ref</td><td>pgo-2982</td></tr><tr><td>Site address</td><td>30-36, Clarendon Road Off Hornsey Park Road, Wood Green, London, N8 0DJ</td></tr><tr><td>Proposal description</td><td>Demolition of the existing buildings and construction of a part two, six, eight and eleven storey building plus basement mixed use development comprising 51 residential units and 560 sqm of commercial floorspace, with access, parking and landscaping.</td></tr><tr><td>Date on fire statement</td><td>17/10/2022</td></tr><tr><td>Date consultation received</td><td>16/03/2023</td></tr><tr><td>Date response sent</td><td>13/04/2023</td></tr></table> 1. Substantive response for the local planning authority Thank you for consulting HSE about this application. Headline response from HSE Headline Response from HSE (content) Scope of consultation 1.1. The above consultation relates to a proposed relevant building consisting of 12 storeys served by two staircases. 1.2. The fire statement dated 17/10/2022 states that the adopted fire safety design standards are British Standard 9991 and Approved Document B Volume 2. HSE has assessed the application accordingly. 1.3. Following a review of the information provided with this consultation, HSE is satisfied with the fire safety design, to the extent that it affects land use planning.	To LPA	Haringey	LPA planning ref no	HGY/2022/3846	Our ref	pgo-2982	Site address	30-36, Clarendon Road Off Hornsey Park Road, Wood Green, London, N8 0DJ	Proposal description	Demolition of the existing buildings and construction of a part two, six, eight and eleven storey building plus basement mixed use development comprising 51 residential units and 560 sqm of commercial floorspace, with access, parking and landscaping.	Date on fire statement	17/10/2022	Date consultation received	16/03/2023	Date response sent	13/04/2023	Comments noted.
To LPA	Haringey																	
LPA planning ref no	HGY/2022/3846																	
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Date on fire statement	17/10/2022																	
Date consultation received	16/03/2023																	
Date response sent	13/04/2023																	

Stakeholder	Question/Comment	Response
	HSE Executive 2. Supplementary information <i>The following information does not contribute to HSE's substantive response and should not be used for the purposes of decision making by the local planning authority.</i> Means of escape 2.1. Drawings show bedroom windows in close proximity and perpendicular to escape route windows on upper floors. Additionally, a switch gear room window is perpendicular to the fire exit on the ground floor. This proximity and angle poses a risk of fire spread to the means of escape via windows. The adopted fire safety design standard states that walls recessed from openings in escape route walls should be fire resisting within 1.8m of the opening. In this instance, however, the resolution of this matter may not affect land use planning considerations. This will be subject to later regulatory assessment. Fire service access 2.2. The ground floor drawing shows that the firefighting shaft is not lobbied from the covered car park. The relevant fire safety design standard requires that a corridor leading to a firefighting shaft be lobbied from ancillary accommodation, and should not be used as circulation space. In this instance, however, the resolution of this matter may not affect land use planning considerations. This will be subject to later regulatory assessment. Yours sincerely 13/04/2023  Signed by: jon.bryan This response does not provide advice on any of the following: ▪ matters that are or will be subject to Building Regulations regardless of whether such matters have been provided as part of the application ▪ matters related to planning applications around major hazard sites, licensed explosive sites and pipelines ▪ applications for hazardous substances consent ▪ London Plan policy compliance	
NEIGHBOURING PROPERTIES	Land Use and housing - Concerns the commercial unit will remain vacant	The site allocation for the

Stakeholder	Question/Comment	Response
	- Excessive commercial use proposed - More housing developments are not needed in the area	site requires provision of commercial space and the provision would deliver the aims of the site allocation. Delivery of housing is essential to meeting Local Plan Housing targets. The applicant has provided evidence to show that the commercial market is buoyant at present
	Size, Scale and Design - Excessive height, bulk, massing and overdevelopment of site - Overbearing and not in keeping in relation to neighbouring buildings - The design is not in keeping with surrounding area - The height is not in accordance with the Clarendon Square development	Size, Scale and Design The proposed design and scale of the

Stakeholder	Question/Comment	Response
	- The design is contrary to the Haringey Heartlands Development Framework April 2005 - Obstruction to the skyline Impact on neighbours - Loss of privacy/overlooking/overshadowing - Loss of daylight and sunlight - Noise and disturbance	development remains a high-quality design that is in-keeping with the approved development and surrounding area in line with the policies and site allocation set out above This proposed development is considered appropriate in this location, Impact on neighbours As noted in the neighbouring amenity section above the proposal would not have a significant impact on

Stakeholder	Question/Comment	Response
	Parking, Transport and Highways - Parking pressure - Increased traffic generated - Concerns the development is car free - Turnpike Lane/Hornsey Park road junction is not pedestrian friendly - Road safety concerns - Increased deliveries and vehicle trips per day - Highway safety concerns - No access for emergency vehicles	neighbouring properties in terms of privacy, daylight or sunlight. The proposal will not result in any greater noise or light levels than should be expected in an urban area. Parking, Transport and Highways The Transportation Officer has assessed these points and which have been covered in the main body of the report and concludes that the proposed development is considered acceptable, in

Stakeholder	Question/Comment	Response
	Environment and Public Health - The development lacks greenery - The green space improvements located at roof level does not benefit the wider local area - Structural damage to infrastructure - Pressure on existing infrastructure - Noise and disturbance during construction - Impact on quality of life - Concerns the development provide no ground level garden to absorb heavy rainfall - Air quality concerns	regard to transport impacts Environment and Public Health Any dust and noise relating to demolition and construction works would be temporary nuisances that are typically controlled by non- planning legislation. Nevertheless, the demolition and construction methodology for the development would be controlled by the imposition of a condition The site currently achieves an

Stakeholder	Question/Comment	Response
		urban greening factor of 0.28 and the proposed development achieves an urban greening factor of 0.43 which exceeds the minimum target set out in the London Plan As noted in the flood risk and drainage section, the Flood Risk Assessment and Drainage Strategy report, Officers are satisfied that the impacts of surface water drainage will be addressed adequately. The scheme would provide

Stakeholder	Question/Comment	Response
		CIL payment towards local infrastructure. As noted in the air quality section an addendum Air Quality Assessment is required which Officers are satisfied can be adequately addressed at a later stage, and as such this matter can be secured by the imposition of a condition.

Appendix 4 Consultation Response– Greater London Authority Stage 1 Response

GREATER **LONDON** AUTHORITY

Planning report GLA/2023/0068/S1/01

27 March 2023

30-36 Clarendon Road, Off Hornsey Park Road

Local Planning Authority: Haringey

Local Planning Authority reference: HGY/2022/3846

Strategic planning application stage 1 referral Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008.
The proposal Demolition of the existing buildings and construction of a building up to 11-storeys (plus basement) to provide 51 residential units and 560 sq.m. of commercial floorspace with access, parking and landscaping.
The applicant The applicant is Paul Simon Magic Group and the architect is Stockwool .
Strategic issues summary Land use principles: The redevelopment of this allocated site within the Wood Green Growth Area would contribute to the continued regeneration of this Strategic Area for Regeneration and is supported in line with London Plan Policies H1, E2, SD10 and Objectives GG1 and GG2. Affordable housing: The scheme is proposing 36% affordable housing by habitable room, comprised of 60% affordable rent and 40% intermediate tenure. Confirmation of the affordable rent levels and the intermediate product is required, and an early stage viability review secured. Heritage & urban design: Broadly supported and the proposal complies with Policy D9B and may accord with the qualitative assessment criteria set out at Policy D9C; and no harm would be caused to any nearby heritage assets. Transport: Car-free nature of the proposal is supported and the improvements identified in the Active Travel Zone assessment should be secured via a Section 278 agreement; the amount of commercial cycle parking should be increased and all cycle parking designed to meet LCDS standards; and, various transport-related plans to be secured. Other issues on the energy strategy, WLC, circular economy, water, air quality, urban greening and biodiversity also require resolution prior to the Mayor's decision making stage.
Recommendation That Haringey Council be advised that the application does not yet comply with the London Plan for the reasons set out in paragraph 52. Possible remedies set out in this report could address these deficiencies.

Context

1. On 25 January 2023 the Mayor of London received documents from Haringey Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008, the Mayor must provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.
2. The application is referable under the following category of the Schedule to the Order 2008:
 - **Category 1C:** *"Development which comprises or includes the erection of a building of (c) more than 30 metres high and is outside the City of London."*
3. Once Haringey Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or, allow the Council to determine it itself.
4. The Mayor of London's statement on this case will be made available on the GLA's public register: <https://planning.london.gov.uk/pr/sl/>.

Site description

5. The application site is approximately 0.08 hectares and is bound by Clarendon Road to the north, east and west and the Clarendon Recovery College to the south. Located within a Strategic Area for Regeneration in the London Plan and the Haringey Heartlands section of the Wood Green Growth Area, the application site forms part of Site Allocation SA23 – Clarendon Road South and Draft site allocation WGS27 in the Wood Green Area Action Plan. The application site is also within the boundaries of the emerging Wood Green Opportunity Area.
6. The nearest part of the Strategic Road Network (SRN) is the A105, Green Lanes approximately 550 metres to the east of the site.
7. A 1970's 2-storey industrial unit containing approximately 595 sq.m. of employment floorspace, with nine car parking spaces, currently occupies the site. The ground floor is in use as a temporary nursery and the upper floor is in use for office and storage for the Jessica Buttons factory. The site, however, is neither designated as Strategic Industrial Land (SIL) nor a Locally Significant Industrial Site (LSIS).
8. Although not within a conservation area or occupied by any listed buildings, there are a number of heritage assets in proximity of the site including the statutory listed Grade II* Church of St John The Baptist and the Grade II Turnpike Lane Underground station, Alexandra Palace Park and Garden, and 69 and 71 High Street. Locally listed heritage assets such as numbers 31, 62 and 120 High Street are also in proximity.
9. There are two bus stops located approximately 80 metres south of the site on Turnpike Lane serving the 144,41, N41 and N91 routes. The closest station is Hornsey Station located approximately 300 metres south which serves Great

Northern rail services. Turnpike Lane underground station is also approximately 570 metres east, which serves the Piccadilly line. The site therefore has a public transport accessibility level (PTAL) of 5 on a scale from 0 to 6b where 0 is the lowest and 6b is the highest. The proposed Quietway 10 cycleway extends along Cross Lane, 500 metres to the west.

Details of this proposal

8. The applicant, Paul Simon Magic Group, is seeking full planning permission for the redevelopment of the site involving the demolition of the existing building and construction of an 11-storey building to provide 51 new residential units and 560 sq.m. of commercial floorspace.

Case history

9. The applicant requested a high-level pre-application meeting with the GLA in July 2020 to discuss the redevelopment of the current application site along with two adjoining properties forming part of the wider site allocation—Clarendon Recovery College (in use as a day centre) and the West Indian Cultural Centre. The application proposed a new state of the art African Caribbean Cultural centre, 100 residential units, a co-living space (100 rooms), gym and co-working space. It is understood that this master planned approach for the delivery of the three sites has not materialised due to land ownership issues.

Strategic planning issues and relevant policies and guidance

10. For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area comprises the Local Plan: Development Management DPD (2017); Local Plan: Site Allocations (2017); Local Plan: Strategic Policies 2013 (with alterations 2017); Local Plan: Tottenham Area Action Plan DPD (2017); and, the London Plan 2021.
11. The following are also relevant material considerations:
 - The National Planning Policy Framework and National Planning Practice Guidance;
 - National Design Guide;
 - Draft New Local Plan, November 2020; and,
 - Draft Wood Green Area Action Plan Regulation 18 Preferred Option Consultation Draft February 2018.
12. The relevant issues, corresponding strategic policies and guidance (supplementary planning guidance (SPG) and London Plan guidance (LPG)), are as follows:
 - Good growth *London Plan;*
 - Economic development *London Plan; the Mayor's Economic Development Strategy; Employment Action Plan;*
 - Employment land *London Plan;*

- Housing *London Plan; Housing SPG; the Mayor's Housing Strategy; Play and Informal Recreation SPG; Character and Context SPG; Housing Design Standards draft LPG;*
- Affordable housing *London Plan; Housing SPG; Affordable Housing and Viability SPG; the Mayor's Housing Strategy;*
- Office *London Plan;*
- Retail *London Plan;*
- Fire Safety *London Plan; Fire Safety draft LPG;*
- Urban design *London Plan; Character and Context SPG; Public London Charter LPG; Housing SPG; Play and Informal Recreation SPG; Housing Design Standards draft LPG; Optimising Site Capacity: A Design-led Approach draft LPG; Fire Safety draft LPG;*
- Inclusive access *London Plan; Accessible London: achieving an inclusive environment SPG; Public London Charter LPG;*
- Sustainable Development *London Plan; Circular Economy Statements LPG; Whole-life Carbon Assessments LPG; 'Be Seen' Energy Monitoring Guidance LPG; Urban Greening Factor LPG; Mayor's Environment Strategy;*
- Transport and parking *London Plan; the Mayor's Transport Strategy; Sustainable Transport, Walking and Cycling draft LPG.*
- Air quality *London Plan; the Mayor's Environment Strategy; Control of dust and emissions during construction and demolition SPG; Air Quality Neutral LPG; Air Quality Positive LPG;*
- Ambient noise *London Plan; London Environment Strategy;*
- Green infrastructure *London Plan; the Mayor's Environment Strategy; Preparing Borough Tree and Woodland Strategies SPG; All London Green Grid SPG; Urban Greening Factor LPG;*

13. On 24 May 2021 a Written Ministerial Statement (WMS) was published in relation to First Homes. To the extent that it is relevant to this particular application, the WMS has been taken into account by the Mayor as a material consideration when considering this report and the officer's recommendation. Further information on the WMS and guidance in relation to how the GLA expect local planning authorities to take the WMS into account in decision making can be found [here](#).

Land use principles

14. Good Growth Objective GG2 of the London Plan promotes the optimisation of land, particularly through the redevelopment of brownfield sites, as a key part of the strategy for delivering additional homes in London.
 15. The site is brownfield land falling within an area designated as a Strategic Area for Regeneration in the London Plan: and London Plan Policy SD10
-

emphasises the importance of the renewal of such designated areas to tackling spatial inequality. The application site also falls within Wood Green Growth Area and is part of Clarendon Road South site allocation in both the adopted Local Plan and the draft Wood Green Area Action Plan (WGAAP). It is identified for an employment-led mixed use development with an indicative capacity of 206 residential units and 5,390 sq.m. of employment floorspace in the Local Plan, and 201 and 8,435 sq.m. respectively in the draft WGAAP. Regarding the type of employment floorspace expected, the Local Plan does not provide any specifics; but the draft WGAAP notes that this should be a studio or SME office space.

Loss of industrial capacity

16. Although not designated as SIL or LSIS, given that the site contains an industrial building it is considered a non-designated industrial site for the purposes of London Plan Policy E4B. London Plan Policy E7C sets out three stand alone circumstances under which mixed-use or residential developments on non-designated industrial sites should be supported. One of the three instances where support should be provided is on sites that have been allocated in an adopted local development plan document for residential or mixed-use development.
17. As mentioned above, the site forms part of a wider site allocation in the adopted Local Plan and therefore the proposed redevelopment of the site accords with Policy E7C. Furthermore, it is understood that the proposed 560 sq.m. of commercial space would be used for predominantly workspace, office or retail use and marketed to local businesses. The provision of workspace and small office spaces is in keeping with the requirements of the site allocation and is also supported in line with London Plan Policy E2. The retail use is also acceptable as this would widen the scope for jobs and skills set; hence contributing aid in positively addressing spatial inequality and economic and social deprivation. In view of the site's location within a Strategic Area for Regeneration, the Council should seek to secure affordable workspace in line with London Plan Policy E3, as well an employment strategy to engender local employment and skills training as promoted in Policy SD10, Policy E11 and Good Growth Objective GG1.

Housing delivery

18. Policy H1 of the London Plan, in seeking to increase the supply of housing in London, sets borough housing targets and allocates to the London Borough of Haringey a target of 15,920 for the period 2019/20 to 2028/29. The scheme is proposing 51 new residential units, which would contribute to the above target and is therefore supported.

Conclusion on land use

19. In conclusion, the redevelopment of this allocated site within the Wood Green Growth Area would contribute to the continued regeneration of this Strategic Area for Regeneration and is supported in line with London Plan Policies H1, E2, H1, SD10 and Objectives GG1 and GG2.

Housing

20. The application is proposing 51 new homes, as set out in Table 1 below, which is supported. The applicant is encouraged to engage with the Council on the unit mix.

Table 1: Proposed housing mix

Tenure	Studio	1Bed	2Bed	3Bed	Units	Units by %	Habitable Rooms	Habitable Rooms by %
Affordable Rent	-	5	2	3	10	31%	28	36%
Intermediate	-	-	5	1	6		19	
Market	3	14	18	-	35	69%	85	64%
Total	3	19	25	4	51	100%	132	100%

Affordable housing

21. Policy H4 of the London Plan seeks to maximise the delivery of affordable housing, with the Mayor setting a strategic target of 50%. Policy H5 of the London Plan and the Mayor's Affordable Housing and Viability SPG set out a 'threshold approach', whereby schemes meeting or exceeding a specific percentage of affordable housing by habitable room, without public subsidy, and other criteria such as tenure mix are eligible for the Fast Track Route (FTR). Such applications are not required to submit viability information to the GLA and are also exempted from a late stage review mechanism.
22. On privately owned industrial land (as is the case here) where there is no net loss of industrial capacity, a minimum of 35% affordable housing by habitable room, without public subsidy, must be provided to be eligible for the Fast Track Route. In instances involving net loss of industrial capacity, a minimum of 50% affordable housing by habitable room (without public subsidy) and other criteria such as tenure mix must be met to qualify.
23. Appropriate tenure splits should be determined through the Development Plan process or by supplementary planning guidance. In this case, Haringey Local Plan sets a strategic target to achieve 60% of affordable housing as affordable rent (including social rent) and 40% as intermediate based on habitable rooms. The scheme is proposing 36% affordable housing by habitable room, comprised of 60% affordable rent and 40% intermediate tenure.
24. The applicant is advised that the proposed affordable rented units must be secured as or compare favourably with the Mayor's London Affordable Rent levels to be considered genuinely affordable. With regard to the intermediate units, the Mayor's preferred products are London Shared Ownership and London Living Rent and these should be provided in line with the household income cap set out in the London Plan and the Mayor's Affordable Homes Programme Fund. A range of rents at income caps below the £90,000 cap for London Shared Ownership (£60,000 for London Living Rent) should be secured

for the first three months of marketing in line with paragraphs 4.6.9 and 4.6.10 of London Plan Policy H6.

25. Ordinarily, as indicated at paragraph 22, a minimum of 50% affordable housing is required to qualify for the FTR where there is a net loss of industrial capacity. It is, however, acknowledged that the proposal responds to the requirements of the Local Plan site allocation in terms of the types of employment space proposed and also includes a small number of residential units (for delivery in a single phase). Therefore, subject to the affordable units being appropriately secured in line with the above requirements, the Council's acceptance of the unit mix and the application meeting all other relevant policy requirements, only an early stage viability review will need to be secured.
26. GLA officers also strongly advise proactive and early engagement on the wording of the draft S106 agreement prior to any Stage II referral being made, to ensure the wording is effective and aligns with policy requirements.

Heritage and urban design

Heritage

27. London Plan Policy HC1 states that proposals affecting heritage assets, and their settings should conserve their significance, avoid harm, and identify enhancement opportunities. The NPPF states that when considering the impact of the proposal on the significance of a heritage asset, great weight should be given to the asset's conservation and the more important the asset, the greater the weight should be. Policy HC1 relates to all heritage assets, including non-designated heritage assets. The NPPF states that in weighing applications that affect non-designated heritage assets, a balanced judgement is required having regard to the scale of any harm or loss and the significance of the heritage asset.
28. As stated earlier in this report, the Grade II* listed Church of St John The Baptist and the Grade II listed Turnpike Lane Underground station; Alexandra Palace Park and Garden; and 69 and 71 High Street are in proximity of the site. GLA officers, however, consider that the proposed development would not cause harm to the significance of these heritage assets in view of its physical and visual separation from the application site and the various interposing developments. The application therefore complies with London Plan Policy HC1.

Urban design

29. Chapter 3 of the London Plan sets out key urban design principles to guide development in London. Design policies in this chapter seek to ensure that development optimises site capacity; is of an appropriate form and scale; responds to local character; achieves the highest standards of architecture, sustainability and inclusive design; enhances the public realm; provides for green infrastructure; and respects the historic environment.
30. The scheme has been subject to an independent design review, having been presented to the borough's Quality Review Panel. This accords with London Plan Policy D4 and is welcomed. The Design and Access Statement submitted with the application outlines changes to the design in response to matters raised during this exercise. This is welcomed.

31. As the proposed number of units per hectare exceeds 350, a management plan detailing long-term maintenance implications, as detailed in paragraph 3.4.9 of Policy D4 will be required. This should be secured by condition.

Layout and public realm

32. The east facing and north-east corner frontages are well activated with the commercial spaces well situated. The shared entrance for all residential tenures is welcomed. The ground floor layout would benefit from more activation to the north-west corner and west facing frontage. The chamfered corner is quite prominent and should be considered for the location of the shared entrance. This would also distribute street level activation better around the base of the building.
33. The interaction of the proposed building's ground floor layout with the future phase building layout to the south should be considered carefully at the time that development comes forward.
34. The provision of new street trees and rain gardens is welcomed. It is noted these are beyond the development boundary. The LPA should ensure that new public realm paving is provided in a way that fully integrates it with the external finishes beyond the site, rather than following ownership boundaries.

Tall buildings, scale and massing

35. With a building over 10 storeys, the proposed development represents a tall building as defined by London Plan Policy D9A and paragraph 6.1.16 under Local Plan Policy SP11. Overall, the approach to height and massing distribution across the site is supported, with a downward transition in height in response to the ground plus 2-storey properties along Hornsey Park Road.
36. Notwithstanding the above, London Plan Policy D9B states that tall buildings should only be developed in locations identified as potentially suitable in development plans, and at D9C sets out a criterion against which tall buildings should be assessed. The criterion focuses on visual, functional, environmental and cumulative impacts.
37. Regarding Policy D9B, the site falls within the Wood Green Growth Area, which the Local Plan identifies as 'may be suitable' for tall buildings. This potential suitability is reiterated in the draft WGAAP, however, no specific building heights are indicated. An assessment against Policy D9C is therefore required to determine the site's suitability for the proposed tall building and this is set out below.

Visual impact

38. The development would appear in long range views as part of the emerging cluster of tall buildings along Clarendon Road. The variation in height, stepped massing and crown would make a positive contribution to the emerging skyline. In mid-range views the building would aid in wayfinding and legibility, with the tallest element of the building landmarking the point where the two branches of Clarendon Road intersect. Additionally, the building's materiality blends well with the townscape given the prevalence of brick in the existing and emerging context. With respect to immediate views, the ground floor is proposed to be well animated ensuring a direct relationship with Clarendon Road; and the height and design of the base would also relate well to the
-

nearby residential properties on Hornsey Park Road. Widened pavements, the introduction of tree planting and the overall improvement of the public realm are also going to help maintain a pedestrian scale.

39. No harm would be caused to the significance of any heritage assets or equally to the composition of any protected views. Given the approach to design and materials, no adverse impact from solar glare is expected. A high-quality standard of architecture is emerging, and the material palette aligns with the existing and emerging context. It is expected that the Council will secure a lighting strategy to ensure any light spill is appropriately mitigated.

Functional impact

40. With respect to functional impact, the building will be equipped with a suitably sized fire evacuation lift and two staircases to safeguard the safety of future occupants. In addition, parking, deliveries and servicing have been considered in the design and plans to monitor/manage these activities will be secured to ensure the building functions without causing disturbance or inconvenience to the public realm. Separate clearly defined entrances for the commercial and residential components are proposed at different points across the site, which along with the small number of homes, should prevent overcrowding.
41. The application site has a public transport accessibility level (PTAL) of 5 and the scheme promotes cycling with the inclusion of cycle parking into the scheme's design. Any potential impact on aviation, navigation and telecommunication interference should be addressed prior to the Mayor's final determination of the application.
42. With the delivery of new housing (including 36% affordable units) and replacement employment floorspace, the proposed redevelopment of the site should contribute positively to the continued regeneration of this London Plan designated Strategic Area for Regeneration. The proposal therefore does not raise any adverse functional impacts.

Environmental impact

43. In terms of the environmental impacts, the application is accompanied by a wind microclimate assessment, daylight and sunlight assessment and an acoustic assessment. As the Local Planning Authority, Haringey Council will undertake a full review of the environmental impacts as part of their assessment of the proposal and GLA officers will work with the Council to ensure that any necessary changes or environmental mitigation measures are appropriately secured prior to the Mayor's final determination.

Cumulative impact

44. Cumulatively, the proposed development would form part of an emerging cluster of tall buildings along Clarendon Road in the Haringey Heartlands locale and would contribute to its nascent diverse and hierarchical skyline. The proposal would also contribute to an enhanced streetscape, with improved active frontages, greening and pavements. The proposal therefore does not raise any significant adverse cumulative, functional and environmental impacts at this time.

Conclusion on Tall buildings

45. In conclusion, the proposal complies with Part B of Policy D9 as it is located in an area identified as potentially suitable in the development plan for tall buildings; and, the development may accord with the qualitative assessment criteria set out in Part C of Policy D9 subject to the satisfactory resolution of the outstanding impacts raised through the provision of further information and/or imposition of conditions to secure mitigation measures. Officers will draw a conclusion in relation to compliance with Policy D9 when the application is referred back to the Mayor at Stage II.

Residential quality

8. All units would meet the London Plan and Mayor's Housing SPG internal space standards. In addition, each unit would have access to its own private amenity space in the form of terraces or balconies. Communal amenity spaces are also proposed at roof level across the development. Efficient cores, with a maximum of six units per core, are proposed; and of the total number of units, 69% would be dual aspect with no single aspect north-facing units. However, it should be noted that the applicant is including homes in this figure that will be impacted by a future phase proposal of up to 8 storeys (indicative in masterplan). Therefore, as currently indicated, when this future phase comes forward the majority of homes in this stack will no longer be meaningfully dual aspect as both aspects will be looking on to the same recessed balcony only. The LPA should ensure that as the future phase design comes forward, the residential quality of this development is not compromised. The applicant should confirm whether the floor to ceiling height of the units will be at least 2.5 metres.
9. In accordance with Policy S4 of the London Plan, development proposals that include housing should provide play space for children based on the short and long-term needs of the expected child population generated by the scheme. The total play space required, using the GLA's 2019 child play space calculator, is 189 sq.m. Of this total, 153 sq.m. is required for children 11 years and under, and the application proposes to provide this amount on-site at roof level. The proposed play elements appear to be diverse; and the spaces would allow for passive surveillance and be accessible by all households regardless of tenure. The Council should ensure that the highest standards of inclusiveness design and safety are secured for these spaces. With respect to play space for children 12 years and over, the application identifies a number of existing off-site play facilities in the vicinity of the application site. The Council will determine whether these spaces are suitable in terms of their accessibility and play elements and apply seek any applicable financial contributions.

Architectural quality

10. The proposed materials palette is supported. The architectural appearance with richer detailing at the base where it will be experienced in close proximity at street level, and then variation of detailing within a common language through the middle and top of the building is appropriate. The proposal for decorative louvred doors to plant areas at ground floor level is positive to enhance their appearance.

Fire safety

11. A fire statement prepared by suitably qualified personnel at Mu.Studio has been submitted with the application and it includes a declaration of compliance stating that "[t]he technical content produced for this planning application is considered to suitably comply with the relevant legislation and requirements of London Plan Policies D5(B5), D12A and D12B, subject to suitable development and implementation during the Building Regulations process, construction, and occupation."
12. An evacuation lift is proposed as required by London Plan Policy D5. With respect to D12, the strategy adequately responds to the six criteria outlined under Policy D12(B). As the proposed building is over 30 metres in height, the design of the building was amended to include two staircases subsequent to the preparation of the fire statement.

Inclusive access

13. The proposal responds positively to London Plan Policy D7 and meets Building Regulation requirement M4 (2) 'accessible and adaptable dwellings' and Building Regulation requirement M4 (3) 'wheelchair user dwellings'. In line with London Plan Policy D5, the private and communal amenity spaces and approaches and entrances to the buildings have been inclusively designed. This is welcomed.

Transport

Healthy Streets and Active Travel Zone Assessment

14. The Mayor's Healthy Streets approach is central to delivering good growth in London and enabling people to travel by walking, cycling and public transport. It is expected that all streets and public realm within and around the site will be designed in line with this approach. This will aid in achieving the outcomes of the Mayor's Transport Strategy relating to healthy streets and healthy people, a good public transport experience, and delivery of good growth.
15. The Active Travel Zone assessment identifies the need for maintenance and footpath repaving improvements to encourage walking, pedestrian safety and access to all. These improvements should be secured by the Council. These improvements should be secured by the Council via a Section 278 agreement.

Buses

16. TfL is developing plans in conjunction with Haringey to expand the local network to improve access to the greater Haringey Heartlands development. This includes a proposal to run a bus route on Clarendon Road to Mary Neuner Road. As such, the applicant will need to ensure that Clarendon Road is accessible and suitable for two-way bus operation based on 12-metre electric double decker buses.

Parking

17. The proposed number of residential cycle parking is in line with London Plan Policy standards—93 long-stay and 3 short-stay spaces. The provision of 5% of the total number as accessible Sheffield stands is welcomed.

18. Currently only 12 short-stay spaces are proposed for the commercial element, which is not in line with London Plan policy and should be increased to 4 long-stay and 28 short-stay spaces given the potential for various uses within Use Class E.
19. All cycle parking should be designed in line with the London Cycling Design Standards, with access to the various cycle stores clearly shown on plans. This should be secured by condition.
20. The car-free nature of the scheme, apart from 2 residential disabled parking bays, is supported in line with London Plan Policy T6.1. The applicant should also provide 1 additional disabled parking bay for the commercial element in line with London Plan Policy T6.5. GLA officers are supportive of there being a permit-free agreement to prevent future residents obtaining a parking permit.

Transport-related plans

21. A full construction logistics plan should be secured by condition in line with London Plan Policy T7 and discharged in consultation with TfL prior to commencement. The full plan should detail all logistics and construction proposals to ensure that pedestrian and cyclist movement and safety and bus operations are maintained throughout construction. This will support sustainable travel in line with London Plan policies and the Mayor's Vision Zero goal to eliminate deaths and serious injuries from London's transport networks by 2041 and ensure compliance with London Plan policy T4(F).
22. A full delivery and servicing plan should also be provided and secured by condition in line with London Plan Policy T7. Deliveries and servicing should be arranged to occur outside of peak times.
23. An outline residential travel plan has been submitted. Funding for the implementation and monitoring of a full travel plan should be secured in the Section 106 agreement in line with London Plan Policies T1 and T4(B).

Sustainable development & Environmental issues

24. Unless otherwise stated, full technical responses under each policy area set out below have been provided to the Council and applicant.

Energy strategy

25. The London Plan requires all major developments to meet a net-zero carbon target. Reductions in carbon emissions beyond Part L of the 2013 Building Regulations should be met on-site. Only where it is clearly demonstrated that the zero-carbon target cannot be fully achieved on-site a contribution to a carbon offset fund or reductions provided off site can be considered.

Energy strategy compliance

26. An energy statement has been submitted with the application. The energy statement does not yet comply with London Plan Policies SI2, SI3 and SI4. The applicant is required to further refine the energy strategy and submit further information to fully comply with London Plan requirements. Full details have been provided to the Council and applicant in a technical memo that should be responded to in full; however, outstanding policy requirements include:

- Be Lean – updates to modelling for the non-domestic element;
- Be Clean – demonstration the load connected to the communal network is maximised;
- Be Green – demonstration that renewable energy has been maximised, including roof layouts showing the extent of PV provision and details of the proposed air source heat pumps;
- Be Seen – confirmation of compliance with this element of policy, with compliance to be secured within the S106 agreement;
- Energy infrastructure – further details on the design of district heating network connection is required, and the future connection to this network must be secured by condition or obligation;
- Managing heat risk – further details to demonstrate the cooling hierarchy has been followed.

Carbon savings

27. For the domestic element, the development is estimated to achieve a 71% reduction in CO₂ emissions compared to 2013 Building Regulations. For the non-domestic element, a 57% reduction is expected.

Whole Life-cycle Carbon

28. In accordance with London Plan Policy SI2 the applicant is required to calculate and reduce whole life-cycle carbon (WLC) emissions to fully capture the development's carbon footprint.
29. The applicant has submitted a whole life-cycle carbon assessment. The WLC assessment does not yet comply with London Plan Policy SI2. The WLC report appears to cover much of the assessment requirements; however, an Excel version of the GLA WLC template must be submitted to allow a full review to be completed against the guidance.
30. A condition should be secured requiring the applicant to submit a post-construction assessment to report on the development's actual WLC emissions. The template and suggested condition wording are available on the GLA [website](#)¹.

Circular Economy

31. London Plan Policy D3 requires development proposals to integrate circular economy principles as part of the design process. London Plan Policy SI7 requires development applications that are referable to the Mayor of London to submit a Circular Economy Statement, following the Circular Economy Statements LPG.
32. The applicant has submitted a Circular Economy Statement in accordance with the GLA guidance. However, at the time the statement was reviewed by GLA officers the completed GLA CE template, which is required to undertake a

¹ <https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance/whole-life-cycle-carbon->

thorough assessment, had not been submitted. The template was recently provided and detailed comments will be sent to the applicant and LPA in due course.

33. A condition should be secured requiring the applicant to submit a post-construction report. The template and suggested condition wording are available on the GLA [website](#)².

Digital connectivity

34. A planning condition should be secured requiring the submission of detailed plans demonstrating the provision of sufficient ducting space for full fibre connectivity infrastructure within the development in line with London Plan Policy SI6.

Urban greening

35. The proposed development presents a well-considered approach to integrating green infrastructure and urban greening across the masterplan. This includes the incorporation of rain gardens and biodiverse roofing which supports multifunctionality, in accordance with Policy G1 of the London Plan. The opportunity for the provision of biosolar roofing should be explored.
36. There appears to be existing greening to the south-east of the site, the applicant should consider creating a more considered green link into this network. As the site boundaries front onto the public highway, the applicant should further consider greening of the public realm. The future phasing plans within the Landscape Strategy should also further demonstrate green links and integration into London's wider green infrastructure network.
37. The applicant has calculated the Urban Greening Factor (UGF) score of the proposed development as 0.43, which exceeds the target set by Policy G5 of the London Plan. This should be treated as a minimum and any improvements to the quality and quantity of urban greening made where possible.
38. London Plan Guidance on Fire Safety restricts the use of combustible materials, limiting the use of green walls where they form part of the external wall of a building. The proposed urban greening should therefore be reviewed against this guidance and updated as appropriate. Where this review finds it necessary to remove a green wall, opportunities should be sought to make up any reduction in the UGF by improving the quality or quantity of greening across the wider masterplan. For further information on combustible materials see: <https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance/fire-safety-lpg>

Sustainable drainage and flood risk

Flood Risk Management

39. The site is in Flood Zone 1 and is within a Critical Drainage Area (CDA). A Flood Risk Assessment (FRA) has been submitted as required under the National Planning Policy Framework (NPPF). The FRA, however, needs to demonstrate that flood risk will not be displaced/increase elsewhere due to the

development. It should be demonstrated that any flooding up to the 100-year plus 40%CC should be safely contained within site and that any excess flood water is not displaced off site. Moreover, considering the development includes a basement, further information on the groundwater flood risk to the site needs to be provided than the information provided in the council SFRA. The FRA provided for the proposed development therefore does not comply with London Plan Policy SI12.

Sustainable drainage

40. The surface water drainage strategy for the proposed development does not comply with London Plan Policy SI13.
41. The proposed discharge rate should be reduced as close as possible to the QBAR greenfield rate, the proposed impermeable area used to avoid overestimation and pumping avoided. In addition, the proposed areas of permeable paving need to be shown on the drainage plan and a robust justification for the absence of rainwater harvesting provided.
42. Finally, the FRA should demonstrate that flood risk will not be displaced/increase elsewhere due to the development, hydraulic calculations should be provided (including a range of return periods and storm durations) and permeable paving included in the maintenance plan.

Water efficiency

43. The Sustainability Statement notes that the proposed dwellings will target a maximum indoor water consumption of 105 l/person/day, in line with the optional standard in Part G of the Building Regulations. For the non-residential element, 3 Wat 01 credits are targeted, with water consumption reduced by 40%. This complies with London Plan Policy SI5. Water efficient fittings are proposed, which is welcomed; but water meters and a leak detection system should also be proposed as well as water harvesting and reuse to reduce consumption of water across the site.

Air quality

44. London Plan Policy SI1 requires applications to be accompanied by an air quality assessment, which demonstrates how the development would not lead to further deterioration of existing poor air quality, create any new areas that exceed air quality limits (or delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits) or create unacceptable risk of high levels of exposure to poor air quality.
45. The application is accompanied by an air quality assessment and the development would be air quality neutral. However, further clarification particularly in relation to the operational phase exposure assessment is required.

Biodiversity

46. London Plan Policy G6 states that proposals that create new or improved habitats that result in positive gains for biodiversity should be considered positively. Policy G6 further states that development proposals should aim to secure net biodiversity gain. Trading rules should also be satisfied.

47. The applicant should provide quantitative evidence that the proposed development secures a net biodiversity gain in accordance with Policy G6(D). If biodiversity net gain is not achievable on the site, the applicant should review opportunities for biodiversity offsetting in consultation with the borough.
48. Recommendations in the Preliminary Ecological Assessment should be implemented, or robust justification should be given as to why they cannot be. The applicant should prepare an Ecological Management Plan (EMP) to support long-term maintenance and habitat creation. The EMP should be secured by planning condition and approved if the proposed development is granted planning consent.

Local planning authority's position

49. In due course the Council will formally consider the application at a planning committee meeting.

Legal considerations

50. Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged; or, direct the Council under Article 6 of the Order to refuse the application; or, issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application (and any connected application). There is no obligation at this stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

Financial considerations

51. There are no financial considerations at this stage.

Conclusion

52. London Plan policies on industrial land, strategic and local regeneration, skills and opportunities for all, housing, affordable housing, urban design, heritage, transport, sustainable development and environmental issues are relevant to this application. Whilst the proposal is supported in principle, the application does not fully comply with these policies, as summarised below:
 - **Land Use Principles:** The redevelopment of this allocated site within the Wood Green Growth Area would contribute to the continued regeneration of this Strategic Area for Regeneration and is supported in line with London Plan Policies H1, SD10 and Objectives GG1 and GG2.
 - **Affordable housing:** The scheme is proposing 36% affordable housing by habitable room, comprised of 60% affordable rent and 40% intermediate

tenure. Confirmation of the affordable rent levels and the intermediate product is required, and an early stage viability review secured.

- **Heritage and urban design:** Broadly supported and the proposal complies with Policy D9B and may accord with the qualitative assessment criteria set out at Policy D9C; and no harm would be caused to any nearby heritage assets.
- **Transport:** Car-free nature of the proposal is supported and the improvements identified in the Active Travel Zone assessment should be secured via a Section 278 agreement; the amount of commercial cycle parking should be increased and all cycle parking designed to meet LCDS standards; and, various transport-related plans to be secured.
- **Sustainable development & Environmental issues:** The development is estimated to achieve a 71% and 57% reduction in CO₂ emissions compared to 2013 Building Regulations for the domestic and non-domestic elements respectively; further information is required on the energy strategy as well WLC, circular economy, water, air quality, urban greening and biodiversity.

For further information, contact GLA Planning Unit (Development Management Team):

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We are committed to being anti-racist, planning for a diverse and inclusive London and engaging all communities in shaping their city.

Appendix 5 QRP Reports

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Haringey Quality Review Panel

Report of Formal Review Meeting: African Caribbean Cultural Centre

Wednesday 12 August 2020

Panel

Peter Studdert (chair)
Andrew Beharrell
Marie Burns
Andrew Taylor
Wen Quek

Attendees

Dean Hermitage	London Borough of Haringey
Richard Truscott	London Borough of Haringey
Tobias Finlayson	London Borough of Haringey
Cindy Reriti	Frame Projects
Lana Elworthy	Frame Projects

Apologies / report copied to

Emma Williamson	London Borough of Haringey
Robbie McNaugher	London Borough of Haringey
John McRory	London Borough of Haringey
Deborah Denner	Frame Projects
Sarah Carmona	Frame Projects

Confidentiality

This is a pre-application review, and therefore confidential. As a public organisation Haringey Council is subject to the Freedom of Information Act (FOI), and in the case of an FOI request may be obliged to release project information submitted for review.

1. Project name and site address

The African Caribbean Cultural Centre, Clarendon Road, London N8 0DD

2. Presenting team

John Woolstencroft	Stockwool Architects
Deborah Wartenberg	Stockwool Architects
Tulshi Patel	Stockwool Architects
Warren Standerwick	Standerwick Land Design
Frances Young	DLP Planning

3. Planning authority briefing

The proposed development is for the construction of a new African Caribbean Cultural Centre, B1 office space, gym floor space, 100 residential units, 100 co-living rooms, along with a new public square and amenity areas and improved access and parking. It forms part of the Haringey Heartlands growth area.

The site is located to the south west of Clarendon Road and north of Turnpike Lane. Shaped like an inverted, upside down letter L, the site wraps around the north and east flanks off the Westpoint Apartments (1 - 69 Turnpike Lane). The site is within the southernmost part of the Clarendon Road South Site Allocation (SA23) and the emerging Wood Green Area Action Plan Site Allocation (WGSA27). The site is suitable for a tall building in line with Development Management Policy DM6: Building Heights and emerging Wood Green Area Action Plan Policy WG6: Tall Buildings and Local Views Policy.

Officers welcome the panel's views on the design quality of the scheme and its potential to become a coherent part of the existing neighbourhood.

4. Quality Review Panel's views*Summary*

The Quality Review Panel considers that the scheme has a lot of potential for a rich provision of placemaking – offering a variety of uses for the local area, including a new African and Caribbean Cultural Centre (ACCC). However, it considers that the scale and massing need to be reconsidered. While panel members offer differing, equally valid, views on what they consider to be an acceptable height for the two tower blocks, the entire panel agrees that the scale and massing requires further extensive investigation and modelling, to determine the appropriate adjustments to strike a balance – hierarchy of scale and massing form – that sits comfortably within the wider site context. Continued discussion with Haringey planning officers is required, to ensure that the development is of the desired high standard of design. The panel offers comments on how the proposals can be further refined, including: architectural expression; landscape and public realm; plan, layout and use; and cycle strategy. These comments are expanded below.



Scale and massing

- Panel members have differing views on the proposed scale of the development. It considers that the scale and massing of the buildings, the relationship of the two tower blocks to each other, and the ability of the scheme to sit comfortably in the wider site context merit reconsideration, in discussion with the Haringey officers.
- It is essential that the scheme be considered within its wider site context. The panel feels that this would provide clarity regarding both the appropriate hierarchy of scale and the form of the massing.
- It considers that the massing needs to be simplified, to break up the forms and prevent the blocks from merging into a one large mass. For example, the lower shoulders of blocks A and B might be removed; and / or the plinth simplified.
- Some panel members feel that the 'clear logic and elegant proportions' of the original concept – the two storey non residential plinth with two simple and distinct tall buildings – was more successful.
- It questions the inclusion of shoulders on the two tower blocks. It is concerned that the shoulders result from a required number of units rather than being design led elements that contribute positively to the health and wellbeing of the residents. Further, the shoulders located on top of the ACCC compromise the design team's ability to provide a future proof flexible open space.
- There is also concern that two simplified tower blocks, rising out of a two storey podium, could appear very stark without high quality materials and careful detailed design. It is crucial that the evident level of care and consideration given to the initial studies be carried through to construction.
- Acceptability of height is dependent upon the inclusion of detailed drawings, submitted as part of the planning application and subsequent approved drawings, as opposed to merely including a condition.
- The panel supports a tall building on the Turnpike Lane junction, marking the entrance to the Haringey Heartlands.
- However, some panel members feel that 14 storeys is excessive. There are concerns that the height will undermine the prominence of the marker building for Homsey Station in the Railway Approach development to the south, and overwhelm Westpoint Apartments, adjacent to the west boundary of the site, which is a significant local landmark.
- The panel agrees that block A should be the taller of the two towers but wonders if the composition of the overall scheme might be improved if the heights of the two blocks were adjusted – increasing the height of block B and lowering the height of block A?



- An alternative approach might be to extrude the shoulders of block A to full height and remove the shoulders of block B, to provide a larger space for the podium garden?
- Greater flexibility would also result from pushing block B further toward the site's boundaries to both the north and the west. This move would increase the prominence of block B, at the south end of Clarendon Road, tighten the connection to the service courtyard and increase the site area available.
- The reconsideration of the scale and massing will require further extensive investigation and modelling, to determine the appropriate adjustments to strike a balance between the hierarchy of scale and the massing that sits most comfortably within the context of the wider site.
- The panel strongly recommends that detailed microclimate analysis be undertaken, in conjunction with the design development, to ensure that a high quality of life is assured for both future residents and the existing neighbourhood residents.

Architectural expression

- As noted above, that panel emphasises the necessity for quality materials and carefully considered detailing, to ensure that what is constructed is of the desired high standard for the site.
- The panel questions the inclusion of the metal banding – the divergence from the masonry brick and the proportions. It feels that the architectural expression of the elevations would be much stronger with the emphasis on the verticality of the building.

Landscape and public realm

- The panel wonders if one large, well managed podium garden would be more beneficial to the health and wellbeing of residents rather than five small and fragmented amenity spaces – located on the podium and the shoulders of the two tower blocks.
- The service courtyard could be further maximised. If the servicing could be controlled, there is the opportunity for a quiet spill out space for the ACCC with a favourable south / south west aspect.
- The panel also wonders if the green space along the south boundary might be better utilised as a high quality hardscape area, adjacent to the co-living and co-working entrance on Tumpike Lane.

- Further thought is required regarding the tree planting in the centre of Clarendon Road. The panel suggests that the trees would be better located along the pavement, to the west of Clarendon Road, to extend the existing tree line on Homsey Park Road and to provide additional shade and further improve the public realm of the proposed African Caribbean community garden adjacent to the ACCC's main entrance.
- The panel urges the provision of a shared surface on the area of Clarendon Road adjoining the main entrance to the ACCC, to aid in the calming of traffic and to increase the awareness of pedestrians.
- The panel agrees that part of character of this area is the role that alleyways play within the residential neighbourhood. It wonders if more could be made of this aspect within the new development?

Plan, layout and use

- The panel questions the inclusion of three different uses – co-working, residential accommodation and co-living – within block A. It is concerned that this programme is having an adverse effect on the massing and that it will result in a building that is overly complex to design and to construct.
- The diagram could be simplified by locating the co-living in block B and the residential accommodation in block A; avoiding a reduction in co-working floor space for core access to the co-living floors.
- The panel urges careful consideration of the co-living concept. Greater generosity is required for the communal facilities, to provide the required high quality of living for individuals who will reside in the co-living accommodation. The small bedroom spaces merit a generous communal space for every five / six bedrooms, rather than every 12 as proposed.
- The panel supports the location of the ACCC at the heart of the scheme. It welcomes the provision of the African Caribbean community garden, outside the main entrance on Clarendon Road.
- As noted above, the panel feels that the shoulders of the tower blocks, located directly above the ACCC, compromise the design team's ability to provide a future proof flexible open space.
- The panel notes the location of the bus stop adjacent to the entrance to block A, on Tumpike Lane. It suggests that the public transport link supports the provision of a secondary ACCC entrance from the service courtyard.
- The panel welcomes the provision of a café and an internal colonnade / gallery within the ACCC, offering opportunities to promote integration of the cultural centre with the surrounding neighbourhood.



- The satisfactory provision of an alternative location for the Clarendon Recovery College day centre, currently located on the site, is considered essential.

Cycle strategy

- The cycle strategy requires further development. A high demand for cycle storage is anticipated – from the ACCC, residents, co-working individuals, and visitors to the gym. It is essential that an adequate provision of easily accessible and secure cycle storage is available.
- Cycle parking should be provided at ground level to prevent individuals having to share the lifts with cyclists and their bicycles.

Next steps

- The panel encourages the design team to continue to develop the proposals taking into account the comments above, and in consultation with Haringey planning officers.
- The panel is available to review the African Caribbean Cultural Centre as the designs are developed further, if requested to do so by planning officers.

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Haringey Quality Review Panel

Report of Formal Review Meeting: African Caribbean Cultural Centre

Wednesday 18 November 2020

Video conference

Panel

Peter Studdert (chair)

Phil Armitage

Marie Burns

Tim Pitman

Wen Quek

Attendees

Dean Hermitage	London Borough of Haringey
John McRory	London Borough of Haringey
Richard Truscott	London Borough of Haringey
Shamiso Oneka	London Borough of Haringey
Tobias Finlayson	London Borough of Haringey
Sarah Carmona	Frame Projects
Kyriaki Ageridou	Frame Projects

Apologies / report copied to

Rob Krzyszowski	London Borough of Haringey
Robbie McNaugher	London Borough of Haringey
Deborah Denner	Frame Projects

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1. Project name and site address

The African Caribbean Cultural Centre, Clarendon Road, London N8 0DD

2. Presenting team

John Woolstencroft	Stockwool Architects
Deborah Wartenberg	Stockwool Architects
Warren Standerwick	Standerwick Land Design
Frances Young	DLP Planning
Scarlett Franklin	XCO2 Energy
Ransford Stewart	ACLC

3. Aims of the Quality Review Panel meeting

The Quality Review Panel provides impartial and objective advice from a diverse range of experienced practitioners. This report draws together the panel's advice and is not intended to be a minute of the proceedings. It is intended that the panel's advice may assist the development management team in negotiating design improvements where appropriate and in addition may support decision-making by the Planning Committee, in order to secure the highest possible quality of development.

4. Planning authority briefing

The proposed development is for the construction of a new African Caribbean Cultural Centre, B1 office space, gym floor space, 100 residential units, 100 co-living rooms, along with a new public square and amenity areas and improved access and parking. The site is located to the south west of Clarendon Road and north of Turnpike Lane. The site wraps around the northern and eastern flanks of Westpoint Apartments (1 - 69 Turnpike Lane). The site is within the southernmost part of the Wood Green Library Site Allocation and the emerging Wood Green Area Action Plan as Site Allocation 27. The site is suitable for a tall building in line with Development Management Policy DM6: Building Heights and emerging Wood Green Area Action Plan Policy WG6: Tall Buildings and Local Views Policy.

Integral to the site allocations is Development Management Policy DM55: Regeneration and Masterplanning. This policy requires that a masterplan for the wider site is produced that demonstrates that the proposal will not prejudice future, adjacent development. The site allocation provisions seek to secure and maximise the amount of employment floor space provided. The scheme is expected to provide 50% affordable housing and provide replacement community floor space to meet the existing need on site. The site is PTAL 5, so aside from the requirement to provide 10% 'blue badge' spaces, limited or no on-site car parking for the residential element of the development will be supported. Officers welcome the panel's views on the quality of the scheme's design overall.



5. Quality Review Panel's views

Summary

The panel welcomes the opportunity to review the proposals for the African Caribbean Cultural Centre as they continue to evolve. Overall, the panel applauds the work that the design team has done and feels that the revised scheme has responded well to previous feedback. The proposals promise a high-quality development subject to some further refinements. The distribution and mix of uses within the development are supported, and the panel feels that work to rationalise the configuration of the scheme has been successful. The architectural expression and landscape design are well-mannered, but there remains some scope for some further refinements. In addition, further work on the layout of the co-living accommodation, the co-working spaces, the residential entrances and the cycle parking is required, in order to improve the quality and liveability of the proposals. Subject to the comments outlined in detail below, the panel offers warm support for the scheme.

Scale and massing

- In general, the amendments to the massing and distribution of uses have been successful, and the rationalisation of how the uses are stacked has benefitted the proposals. The panel welcomes the relocation of Block B to the west and its reduction in depth, which gives more breathing space to the scheme overall.
- It considers that the scale of the scheme is acceptable but notes that it is at the limit of what is appropriate within the location. A building of 14 storeys on the corner (as proposed) would be visually commanding and would provide a strong edge to the open space of the wide corner.

Landscape and public realm

- The panel welcomes the revised landscape proposals for the scheme; the relocation of the street trees and the reconfiguration of the courtyard are both very positive improvements.
- It will be important to retain the ambition for quality in the materials, detailing and execution of the landscape proposals. The panel would like to see the ongoing involvement of a landscape architect in the project to help ensure that quality is protected.
- It welcomes the landscaped roof gardens and podium. However, adequate structure and anchoring details will be required to accommodate the types of planting proposed, and to ensure the robustness and longevity of the landscape scheme.

- The panel would encourage the design team to identify and understand the desire lines and levels of footfall locally to the scheme. A greater definition – through design – of what is ‘front’ and ‘back’ (or what is public and private/semi-private) will help to curate how people will move around and through the site and should avoid the scheme becoming too permeable.
- Lighting will contribute significantly to the character of the scheme and will be particularly important within the courtyard space.
- Catenary lighting could be used to differentiate the character of different areas and could be very attractive within the spill-out space for the cultural centre. The panel notes that careful consideration of siting would be required to ensure that service vehicles would not damage the catenary wire.

Plan, layout and use

- The panel understands the desire for the co-working facility to have a prominent entrance at the southern end of the building, but it wonders whether it may be beneficial to locate the entrance more centrally. This would avoid a very long and deep floor plan, which will create a restricted ‘bottle-neck’ as the co-working circulation runs through the primary core. It notes that the current layout may prove difficult in use and management.
- The panel recognises that the design team have worked hard to increase the generosity of the individual co-living rooms. However, it thinks that further consideration – and generosity – of the communal facilities is also required. To avoid the accommodation feeling very institutional with long, narrow corridors, an approach that establishes and reinforces smaller clusters of rooms should be adopted that will underpin the hierarchies of living, which will be extremely important for sociability. Informal social spaces are also needed, which will provide for a richness of interactions; for example, when a resident steps out of the lift.
- Other schemes for co-living are coming forward within London and further afield. It remains an emerging typology, and more thought needs to be given to avoiding potential management problems, while creating a new environment for living that will endure.
- The panel has concerns about the separation of residential entrances, with the affordable accommodation entrance located at the rear. It feels this should be rethought, with both tenures accessed directly from the street. This would avoid negative perceptions and ensure that all of the residential accommodation has a clear ‘address’ on the street.



Architectural expression

- The panel welcomes the crispness and quality of the detailing and of the materials proposed. This quality needs to be maintained, however, if the desired high standard for the site is to be achieved and the panel would support planning officers in securing this through planning conditions.
- The architectural language and the rhythm of brick and framed openings works well. The double order system used within the elevation is convincing and could potentially be explored further.
- The panel would encourage further thought on how the elevational treatment of the different faces of the building could vary in order to better respond to the different microclimate challenges (discussed in further detail, below).
- Further exploration of how the junction between the 14-storey element and the 12-storey element of Block A is visually conceived would also be supported. The panel would like to see a confident approach to the break in mass at the corner. For example, special folded/faceted bricks or recessed amenity spaces could help reinforce this break.
- The elevation of Block B onto Clarendon Road could be further developed and differentiated, to express its position as a 'turning point' within the form of the building.
- The lift is a significant vertical element on the west side of the scheme and will be highly visible across the railway and from Alexandra Park. The lift lobby and lightwell therefore need to be well-detailed.

Environmental design and sustainability

- The panel welcomes the general approach to sustainable environmental design but notes that the technical detailed design will be critical in ensuring that these ambitions are realised.
- While the provision of a district-wide heating network is anticipated within the London Plan, the current scheme should be designed to operate effectively and sustainably prior to establishment of this network as well as ready to connect to it in the future.
- While the fabric improvement standards proposed are acceptable, the panel would encourage the design team to look at how the energy efficiency of the building's envelope could be enhanced through passive design features. It notes that the four faces of the building are similar, yet all have different orientations and micro-climate challenges. Potential exists to refine the

detailed design of the different elevations in order to make them more responsive to climate and orientation.

- As there are different uses within different areas of the building, it will be important to integrate user-type profiles to enhance the energy efficiency approach across the whole development. For example, deep floor plans can be improved through careful design to increase access to light.
- Heat pumps have only been relatively recently adopted within commercial development, and a careful understanding of how to optimise their use within this setting could make a difference to the overall performance of the building.
- The panel notes that there is often a tension between the goals of biodiversity and solar energy generation through the inclusion of photovoltaic panels at roof level, as overshadowing can significantly reduce performance. In this regard, it is more realistic to adopt either photovoltaic panels or a living roof, rather than both in tandem.

Cycle strategy

- The panel would encourage further consideration of the arrangements for cycle parking, to ensure that it is convenient, accessible, and secure, for both the co-living and residential accommodation, ideally at ground or basement level. Providing a ramp or a lift to the basement would improve access and convenience.

Next steps

The panel is confident that the project team will be able to address the points above, in consultation with Haringey officers.

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London Borough of Haringey Quality Review Panel

Report of Chair's Review Meeting: Jessica Buttons site

Wednesday 17 August 2022

Room 5M1, Clockwise Wood Green, Greenside House, 50 Station Road, London N22 7DE

Panel

Peter Studdert (chair)
Louise Goodison

Attendees

Rob Krzyszowski	London Borough of Haringey
John McCory	London Borough of Haringey
Valerie Okeiyi	London Borough of Haringey
Richard Truscott	London Borough of Haringey
Robbie McNaugher	London Borough of Haringey
Kate Trant	Frame Projects
Joe Brennan	Frame Projects

Apologies / report copied to

Suzanne Kimman	London Borough of Haringey
Aikaterini Koukouthaki	London Borough of Haringey
Elizabeth Tonazzi	London Borough of Haringey
Deborah Denner	Frame Projects

Confidentiality

This is a pre-application review, and therefore confidential. As a public organisation Haringey Council is subject to the Freedom of Information Act (FOI), and in the case of an FOI request may be obliged to release project information submitted for review.

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1. Project name and site address

Jessica Buttons site, 30–36 Clarendon Road, London N8 0DJ

2. Presenting team

Yan Uren	Stockwool Architects
John Woolstencroft	Stockwool Architects
Frances Young	DPL Planning
Carly Tan	Paul Simon Magic Homes
Jack Sewell	XCO2
Warren Sanderwick	Sanderwick Land Design

3. Planning authority briefing

The Jessica Buttons site comprises a two-storey 1970s industrial building, located at the north of a mixed-use site that also includes the two-storey West Indian Cultural Centre in the south-east of the site and the Council's Day Centre (the Clarendon Recovery College) to the south-west.

The wider site is bound by Clarendon Road to the north, north-east and west, Homsey Park Road to the east and Turnpike Lane to the south and forms an important gateway site to the Haringey Heartlands.

Since the previous Quality Review Panel meeting on 18 November 2020, the applicants have revised the masterplan of the larger Clarendon Road site, retaining the principles from the previous proposal. This will include re-providing the African Caribbean Cultural Centre as part of a later phase. The present scheme will focus on the first phase to the north of the site known as the Jessica Buttons site.

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4. Quality Review Panel's views

Summary

The panel broadly supports the proposed scheme, which it feels makes a welcome contribution to the local area and has the potential to create a prominent gateway building. The panel understands the land ownership constraints informing the wider development and supports Masterplan A, which it feels is the more deliverable option and offers greater permeability given the surrounding context. The overall scale of the development seems appropriate, as well as the proposed mix of uses, particularly the commercial space along the Clarendon Road frontage. As design work continues, the panel would encourage further work to create greater variety and texture across the scheme's facades, to improve the appearance of the building, both from a distance and at ground / podium level. It also asks for further thought about the flat layouts in terms of daylighting levels, particularly at the lower floors. The panel also feels that daylighting of the scheme's entrance, and the clarity of layout and ease of circulation within this area is problematic and would benefit from a more generous and welcoming treatment. It also feels that the area occupied by the proposed disabled parking provision is excessive, and suggests that Highways are engaged further to consider how this might be reduced. While recognising the provision of green / amenity space at various levels throughout the building, the panel has concerns about the low level of green / amenity space at ground floor level.

Further details on the panel's views are provided below.

Access strategy

- While supportive of Masterplan A's permeability, the panel has concerns about the approach to the scheme from the south / Tumpike Lane. It suggests that further thought is given to how this vista might be opened up, and how the detailing of the building at ground level might support this.
- The panel suggests further consideration is given to the design and layout of the building's main entrance at ground level. The arrangement of the reception area, corridors and stair / lift access appears overly complex and unresolved.
- The panel recommends further work with Highways to address the disabled parking provision, where creating two bays with forward-access both in and out is leading to an excessive allocation of space. Re-allocating a proportion of the current parking provision to create a more generous entrance to the building at that location would be beneficial to the scheme overall.

Architecture

- The panel is broadly supportive of how the building sits within its surrounding context, with the tallest element of the scheme appropriately signalling as a 'gateway' building. However, the panel recommends further consideration of the detailing of the building to increase 'elegance' and 'delight'.



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- The treatment of each of the building's elevations would benefit from further thought, with a view to introducing variety across the facades. This might be achieved through changes in windows / materials / brickwork, with this detailing being sensitive to the context faced by each different elevation.
- The aim should be to lighten the appearance of the building, which the panel feels is currently quite heavy. The panel points to the brick textures and colours used in other recently completed buildings in the area as reference points.
- In addition, the panel would welcome further thought on the design of the building's base / podium, middle and top, with consideration given to the introduction of variety and texture through these levels.
- The panel also feels that the verticality of the building might be reduced by revisiting the current window treatment, and further consideration given to, for example, horizontal banding at junctures across its facades.
- The panel welcomes the increase in dual-aspect provision since the scheme's last review. However, the panel has concerns about daylighting to some of the deeper flats' interior spaces, particularly at the lower floors. It recommends further improvements to this aspect of the scheme are considered.

Landscape

- The panel welcomes the access afforded to the rooftop garden spaces for all tenures. However, it still has concerns about the level of this provision given the number of residents to be accommodated.
- Similarly, with the current scheme proceeding independently of prospective future development of the College and Cultural Centre sites, the panel expresses its concern about the low level of provision of amenity / green space at ground level.

Next steps

The panel is confident that its concerns can be addressed by the project team in consultation with Haringey officers and, on this basis, is happy to support the scheme.



- Query on the name of the development
- New blocks of flats already going up
- Housing crisis
- Excessive commercial space proposed
- Not enough infrastructure to support development
- Shared ownership is not affordable
- Private blocks should be affordable
- Obstruction to view from Westpoint apartment
- Loss of sunlight
- Overlooking/loss of privacy
- Will each flat in the Westpoint apartment be assessed for daylight/sunlight/overlooking
- How can neighbours have access to the above assessments
- Concerns the construction work will take place at different stages
- Concerns other site will not come forward for development
- Concerns the other 2 sites are outside the applicants ownership
- Why is the entire site not being developed
- Risky to develop the site piecemeal
- The development could look disjointed and unattractive
- A working group for the construction would be helpful
- Haringey's housing target should not be detrimental to its neighbours
- The Clarendon Square development is very disturbing
- Concerns commercial spaces are left vacant
- Concerns there would be overshadowing of gardens
- Overdevelopment
- The scheme does not accord with the masterplan
- The density of the scheme should be reduced
- Stepping down to 2 storeys at Hornsey park road is not correct
- Views are important
- The New River development is a good example

Appendix 7

Pre-application Committee minutes

Pre-Application Briefing to Committee

1. DETAILS OF THE DEVELOPMENT

Reference No: PPA/2020/0024

Ward: Noel Park Ward

Address: West Indian Cultural Centre (to now be known as African Caribbean Cultural Centre) site, Clarendon Road off Hornsey Park Road, N8 0DD

Proposal: Demolition of the three existing buildings and construction of a part 12/14 and part 6/8/10 storey building incorporating a two storey base to provide a new cultural centre, co-workspace, gym and cafe, 85 residential units and 140 co-living units, with access, public realm improvements and landscaping and car and cycle parking.

Applicant: Paul Simon Homes

Agent: Frances Young, DLP Planning Ltd

Ownership: Public (Council) and Private

Case Officer Contact: Tobias Finlayson

2. BACKGROUND

- 2.1. The proposed development is being reported to Planning Sub-Committee to enable members to view it ahead of a full planning application submission. Any comments made are of a provisional nature only and will not prejudice the final outcome of any formally submitted planning application.
- 2.2. It is anticipated that the planning application, once received, would be presented to the Planning Sub-Committee in summer 2021. The applicant has engaged in pre-application discussions with Council Planning Officers as well as presenting the scheme to the Quality Review Panel (QRP) on two occasions.

3. SITE AND SURROUNDINGS

- 3.1. The site is located to the south west of Clarendon Road and north of Turnpike Lane. Shaped like an inverted, upside down letter L, the site wraps around the northern and eastern flanks of the Westpoint Apartments (1-69 Turnpike Lane).
- 3.2. The site is neither listed nor within a conservation area. However, the site is within the southernmost part of the Clarendon Road South Site Allocation (SA23) and the emerging draft Wood Green Area Action Plan Site Allocation (WGSA27).

4. PROPOSED DEVELOPMENT

- 4.1. The proposal is for demolition of the three existing buildings and construction of a part 12/14 and part 6/8/10 storey building incorporating a two storey base to provide a new cultural centre, co-workspace, gym and cafe, 85 residential units and 140 co-living units, with access, public realm improvements and landscaping and car and cycle parking.

5. PLANNING HISTORY

30-36 Clarendon Road (Jessica buttons factory site):

- 5.1. 2019: Planning permission (HGY/2019/2664) granted for change of use to D1 non-residential institution use (church and nursery) for a temporary period of three years only.
- 5.2. 2002: Planning application (HGY/2002/0340) refused for change of use of property from textile storage to community social club.
- 5.3. 1973: Planning permission (OLD/1973/0214) granted for erection of 2 storey industrial building.

20 Clarendon Road ('Day Centre' site) and West Indian Cultural Centre site:

- 5.4. No relevant planning history.

6. CONSULTATIONS

Public Consultation

- 6.1. This scheme is currently at pre-application stage and therefore no formal consultation has been undertaken by the Local Planning Authority at this stage.

Applicant's Consultation

- 6.2. The applicant has been advised of the requirements of the National Planning Policy Framework (NPPF) and the Council's Statement of Community Involvement (SCI), which set out that a developer should engage with and consult the local community in planning and development issues on major developments prior to submitting an application.

- 6.3. Given the Covid pandemic, in lieu of in-person consultation events, the applicant held online consultation events on 14 and 16 November 2020. Any feedback/comments resulting from the applicant's own consultation will be included within its SCI submitted with any forthcoming planning application.

Development Management Forum

- 6.2. Due to the Covid pandemic, an in-person Development Forum (DMF) has not been held. It is anticipated that in lieu of the standard format DMF, an online version will be held before submission and likely early 2021. Should a formal planning application be submitted and brought to this Committee, feedback from the DMF will be included within the written report to the Planning Sub-Committee.

Quality Review Panel

- 6.4. The proposal has been reviewed twice by the Quality Review Panel (QRP), the first on 12 August 2019 and the second on 18 November 2020. The most recent QRP report is attached at **Appendix 1**. The summary of the QRP views is:

The panel welcomes the opportunity to review the proposals for the African Caribbean Cultural Centre as they continue to evolve. Overall, the panel applauds the work that the design team has done and feels that the revised scheme has responded well to previous feedback. The proposals promise a high-quality development subject to some further refinements. The distribution and mix of uses within the development are supported, and the panel feels that work to rationalise the configuration of the scheme has been successful. The architectural expression and landscape design are well-mannered, but there remains some scope for some further refinements. In addition, further work on the layout of the co-living accommodation, the co-working spaces, the residential entrances and the cycle parking is required, in order to improve the quality and liveability of the proposals.

Next steps

The panel is confident that the project team will be able to address the points above, in consultation with Haringey officers.

7. MATERIAL PLANNING CONSIDERATIONS

- 7.1. Officers' initial views on the development proposals are outlined below:

Principle of Development

- 7.2. The principle of a proposed mixed-use development broadly aligns with the longer-term land-use objectives for the site and the strategic land use designations in the Local Plan Strategic Policies, Site Allocations DPD, and the emerging Wood Green Area Action Plan.

Employment, community and residential uses:

- 7.3. The site allocation requirements include re-provision of the existing cultural centre as well as maintaining employment floor space provision, both of which the proposal does. In line with the site allocation, the scheme also includes conventional residential units to increase the viability of the new workspace. The residential units including affordable housing will also contribute to meeting the borough's housing provision targets.

Co-living:

- 7.4. The scheme proposes 140 co-living rooms with associated communal facilities and amenity space. This type of accommodation can provide an alternative to traditional flat shares and includes additional services and facilities, such as room cleaning, bed linen, on-site gym and concierge service. Appropriate conditions could be imposed on a planning consent ensuring that these units could not be rented out as short term accommodation such as AirBnB and other such type land uses.
- 7.5. The council does not have a specific land use planning policy on co-living. However, the Mayor's 'Publication London Plan' Policy H16 (Large-scale purpose-built shared living) is therefore the prevailing policy for co-living schemes and can be given significant weight. The scheme should align with Policy H16 (in full below) and would also need to comply with other policies such as, but not necessarily limited to, an appropriate housing mix that supports balanced communities.

Policy H16 Large-scale purpose-built shared living

A Large-scale purpose-built shared living development⁸¹ must meet the following criteria:

- 1) it is of good quality and design*
- 2) it contributes towards mixed and inclusive neighbourhoods*
- 3) it is located in an area well-connected to local services and employment by walking, cycling and public transport, and its design does not contribute to car dependency*
- 4) it is under single management*
- 5) its units are all for rent with minimum tenancy lengths of no less than three months*
- 6) communal facilities and services are provided that are sufficient to meet the requirements of the intended number of residents and offer at least*

- a) convenient access to a communal kitchen
 - b) outside communal amenity space (roof terrace and/or garden)
 - c) internal communal amenity space (dining rooms, lounges)
 - d) laundry and drying facilities
 - e) a concierge
 - f) bedding and linen changing and/or room cleaning services.
- 7) the private units provide adequate functional living space and layout, and are not self-contained homes or capable of being used as self-contained homes
- 8) a management plan is provided with the application
- 9) it delivers a cash in lieu contribution towards conventional C3 affordable housing. Boroughs should seek this contribution for the provision of new C3 off-site affordable housing as either an:
- a) upfront cash in lieu payment to the local authority, or
 - b) in perpetuity annual payment to the local authority
- 10) In both cases developments are expected to provide a contribution that is equivalent to 35 per cent of the units, or 50 per cent where the development is on public sector land or industrial land appropriate for residential uses in accordance with Policy E7 Industrial intensification, co-location and substitution, to be provided at a discount of 50 per cent of the market rent. All large-scale purpose-built shared living schemes will be subject to the Viability Tested Route set out in Policy H5 Threshold approach to applications, however, developments which provide a contribution equal to 35 per cent of the units at a discount of 50 per cent of the market rent will not be subject to a Late Stage Viability Review.

Design and Appearance

- 7.6. Adopted Local Plan policies identifies the site as being suitable for a tall building. In that policy context, whilst the detailed design is still to be finalised and assessed, at this stage, the proposed height, bulk and massing of the scheme could be considered acceptable. Further, during pre-application discussions, as part of the process, the scheme has been presented to the Quality Review Panel (refer to Appendix 2) which is broadly supportive of the scheme.
- 7.7. However, in addition to the required further detailed design, the above position is contingent on the scheme being acceptable with regard to other policy requirements such as impact on neighbouring residential amenity and microclimate, which would be fully assessed in detail should a formal planning application be submitted.

Density, Residential Mix and Quality

- 7.8. At this stage, the final density of the scheme is not yet known. However, it is noted that the London Plan density matrix is not taken forward in the new Publication London Plan, which instead takes a design led approach to site optimisation. Until formal adoption of policy, however, the density will be required to be taken into consideration as part of any scheme for the site.

Conventional residential units (C3):

- 7.9. As this stage, the mix of units would consist of 85 residential units, which would consist of 5% studio, 27% 1 bedroom, 55% 2 bedroom and 13% 3 bedroom. As the site is within an area identified in the draft Wood Green Area Action Plan as being more suitable for family sized units, the percentage of family sized units is considered low, especially when taking into account the co-living units in the overall mix. All conventional residential units will meet the space requirements set out in Policy D6 (Housing quality and standards) of the Publication London Plan and the Mayor's Housing SPG, having individual access to amenity space in the form of balconies and communal terraces. 56% of the units will be dual aspect and where only single aspect can be achieved, these units would be east or west facing.
- 7.10. On-site child play space will be provided for ages 0-11 years with the remaining age (12+) provision being met offsite by way of financial contribution.

Co-living:

- 7.11. The size of the scheme's co-living rooms ranges from 21-35m² (average 22.5m²) and the average amenity area per person is 9.5m² (6.4m² internal and 3m² external). The amenity areas are provided within the internal co-living communal facilities such as kitchen/dining, TV/cinema room, library and club room. Additional to these areas, co-living residents will have access to the co-work café and gym. The co-living external amenity is provided in dedicated roof terraces at 6th and 8th floors. Communal areas are located on the ground floor.
- 7.12. Unlike conventional residential units (C3), there is currently no Local Llan policy standards or guidelines for co-living minimum room sizes or amenity areas. However, the proposed room and amenity sizes both compare reasonably favourably to recently approved co-living schemes in other London Boroughs.

Affordable Housing

- 7.13. The scheme proposes 40% affordable housing within the conventional residential (C3) block of 85 units, which equates to 27 units overall. The tenure split is proposed to be 59% affordable rented (16 units) and 41% intermediate (11 units).
- 7.14. Regarding the co-living element of the scheme, the London Plan Policy advocates a cash in lieu contribution towards conventional C3 affordable housing off-site. The applicant has indicated that due to cross-subsidising others parts of the scheme such as the replacement community facility (The African Caribbean Cultural Centre), the co-living aspect of the scheme will be unable to provide any financial contribution for off-site affordable housing provision. However, in accordance with the London Plan, as the scheme includes co-living, it must be subject to the Viability Test Route and not the Fast Track Route. Therefore, whether or not it is viable for the co-living element of the scheme to provide a

contribution towards off site affordable housing provision, the proposal will be subject to further detailed scrutiny upon assessment of a planning application.

Impacts on Amenity of Surrounding Residents

- 7.15. Residential properties border the site to the west and are adjacent to the north, north east and east. Whilst the site is identified in the Development Management DPD as being suitable for a tall building, this needs to be considered against other relevant policies including those related to impact on neighbouring residential amenity. Furthermore, Site Allocation SA23 states that heights should be restricted where they adjoin the properties on Hornsey Park Road.
- 7.16. The applicant has advised initial daylight/sunlight testing indicates that the proposed scheme would meet the BRE Guidelines. Any forthcoming planning application will be required to include both a full daylight/sunlight report and a microclimate report, which will be fully scrutinised as part of the planning application assessment process. The views of nearby residents will also be sought via the DM Forum and formal planning application notifications.

Transportation and Parking

- 7.17. In line with policy, given the good accessibility level (PTAL 5), to promote sustainable modes of transport, in addition to compliant levels of cycle parking, both the conventional residential units and co-living use will be 'car free' aside from the appropriate number of 'blue badge' disabled spaces. Also, in line with current policy, the co-working use will not have any car parking but will have compliant levels of cycle parking. Given the existing community use parking, the scheme proposes retaining an appropriate number of spaces so as not to result in parking stress on the surrounding area.
- 7.18. Delivery and servicing will be accommodated to the rear of the site away from close proximity to the junction where there may be conflict with other vehicles.
- 7.19. These matters will be detailed further within the Transport Statement required to be submitted with any forthcoming planning application.

Landscaping

- 7.20. The scheme proposes to improve the public realm interface at the most important 'public' frontages to the north, east and south. This improvement will be aided through keeping servicing to the rear or back of the site. Indicative landscaping and planting plans show an increase in planting to the footway as well as wider pavements and a colonnade to the south in close proximity to the at grade play space. Detailed plans and specifications for such provision will be submitted with any forthcoming planning application.

Sustainability

7.21. The applicant is currently working with officers on ensuring carbon reduction and overheating targets are met. It is also expected that the proposed development be able to connect to the Wood Green District Energy Network (DEN). These matters will be detailed further within the energy and overheating assessments required to be submitted with any forthcoming planning application.

