

Appendix 4: Internal and External Consultee representations

Stakeholder	Question/Comment	
INTERNAL		
LBH Building Control	The fire strategy is satisfactory. The strategy is very advanced and clearly meets all the requirements from a Planning point of view.	Noted.
LBH Carbon Management (Energy and Sustainability)	Carbon Management Response 01/12/2023 In preparing this consultation response, we have reviewed: • Sustainability & Energy Statement Revision P04 (includes overheating analysis) prepared by Buro Happold (dated 30 Nov 2023) • Proposed GA Roof Plan prepared by F3 Architects • Relevant supporting documents. 1. Summary The development now achieves an on-site carbon dioxide reduction of 10% with a connection to District Energy Network (DEN) and 17% with onsite communal heat pump system. The applicant should explore more options to improve the fabric energy efficiency aiming for 15% reduction under Be Lean and maximise on-site renewable energy generation under Be Green scenario. The revised overheating assessment still fails to adequately assess the overheating risks throughout the development and modelling against future weather files is missing. Carbon Management would OBJECT to this application. The development does not currently meet: • London Plan Policy SI4 and Local Plan DM21: Development proposals should minimise adverse impacts on the urban heat island through design, layout, orientation, materials, and the incorporation of green infrastructure. The proposal instead adds on the urban heat island effect through the use of active cooling without proper justification and without following the cooling hierarchy. Appropriate conditions have been recommended. 2. Energy Strategy The revised energy strategy reports no difference in carbon reduction from the earlier report.	Conditions and s106 obligations recommended.

The report shows an improvement of approximately 10% in carbon emissions with SAP10.2 carbon factors, from the Baseline development model with connection to DEN. This represents an annual saving of approximately 3.0 tonnes of CO₂ from a baseline of 30.5 tCO₂/year.

Alternatively, the report also shows an improvement of approximately 17% in carbon emissions with SAP10.2 carbon factors, from the Baseline development model with connection to ASHP. This represents an annual saving of approximately 7.8 tonnes of CO₂ from a baseline of 46.1 tCO₂/year.

The unregulated emission is 33.4 tCO₂/year.

Non-Residential	Scenario 1: DEN			Scenario 2: ASHP		
<i>(SAP10 emission factors)</i>	Total regulated emissions (tCO ₂ /year)	CO ₂ savings (tCO ₂ / year)	Percentage savings (%)	Total regulated emissions (tCO ₂ /year)	CO ₂ savings (tCO ₂ /year)	Percentage savings (%)
Part L 2021 Baseline	30.5			46.1		
Be Lean savings	29.1	1.4	5%	43.9	2.2	5%
Be Clean savings	29.1	0.0	0%	43.9	0.0	0%
Be Green savings	27.5	1.6	5%	38.3	5.7	12%
Cumulative savings		3.0	10%		7.8	17%
Carbon shortfall to offset (tCO ₂)	27.5			38.3		
Carbon offset contribution	£95 x 30 years x 27.5tCO ₂ /year = £78,375			£95 x 30 years x 38.3tCO ₂ /year = £109,155		
10% management fee	£7,837.5			£10,915.5		

Energy Use Intensity / Space Heating Demand

Building type	EUI (kWh/m ² /year)	Space Heating Demand (kWh/m ² /year)	Methodology used
All other non-residential (DEN)	97.42	15.08	Part L2 - approved DSM & none
All other non-residential (ASHP)	66.95	14.97	Part L2 - approved DSM & none

Actions:

- The energy use intensity goes beyond the GLA benchmark. The applicant is required to undertake more effort to reduce the EUI further to the benchmark of 55 kWh/m²/year.
- The energy consumption for hot water constitutes about 40% of the overall energy consumption of the development. It is recommended to use Wastewater Heat Recovery to reduce energy and CO₂ associated production of hot water.
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Energy – Lean

The applicant has proposed a saving of 5% in carbon emission under both scenarios. This goes against the Energy Hierarchy and requirement to take a fabric first approach in line with London Plan Policy SI2 and Local Plan Policy SP4. However, it is understood that it is challenging for non-residential developments to reach the minimum 15% requirement against Part L 2021. Therefore, the development is required to maximise improvement in building fabric parameters as much as possible.

Overheating is dealt with in more detail below.

Energy – Clean

The submitted site plan shows the incoming DEN pipe work below ground to energy centre.

Energy – Green

Under the DEN scenario, a total of 1.6 tCO₂ (5%) reduction of emissions are proposed under Be Green measures with the installation of solar PV panels.

Under ASHP scenario, a communal air-to-water ASHP systems (min. SCOP of 2.5) and SEER of 4.21 will provide hot water, heating, and cooling to the development. A total of 5.7 tCO₂ (12%) reduction of emissions are proposed under Be Green measures.

The revised report proposed an estimate of 169 panels of 385W capacity mounted on a roof area of 486.5 m² covering 291.9m² with total peak output of 65kWp.

All new development must achieve a minimum 20% reduction from on-site renewable energy generation to comply with Policy SP4. It is required that the roof space is maximised to install solar PV.

Actions:

- Policy SP4 required all new development to achieve a minimum 20% reduction from on-site renewable energy generation. Please provide some commentary on how the available roof space has been maximised to install solar PV. Only 60% of the roof space has been used.

Energy – Be Seen

No further comments.

3. Carbon Offset Contribution

A carbon shortfall of 27.5 tCO₂/year remains. The remaining carbon emissions will need to be offset at £95/tCO₂ over 30 years.

The revised deferred carbon offsetting contribution is as follows:

	Carbon Offsetting Contribution (Connection to DEN scenario; tCO ₂)	Carbon Offsetting Contribution (Communal ASHP scenario; tCO ₂)
	Non-residential	Non-residential
Baseline	30.5	46.1
Total cumulative savings per annum (tCO ₂ , %)	(10 %)	(16%)
Shortfall to offset	27.4	38.7
Carbon offset payment due for scenario	£95 x 30 years x 27.5tCO ₂ /year = £78,375 (+10% management fee)	£95 x 30 years x 38.9tCO ₂ /year = £119,155 (+10% management fee)
Carbon Offsetting Contribution payment due at commencement of development	£78,375 (+10% management fee)	

Deferred Carbon Offsetting Contribution (+indexation) payment due <u>if not connecting to the DEN</u>	£40,780 (+10% management fee)
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4. Overheating

The revised overheating assessments fails to

- demonstrate meaningful compliance with London Plan’s cooling hierarchy.
- provide concrete and tangible evidence on why active cooling was proposed.
- model extreme design weather files: 2020s DSY2 and DSY3.

The report fails to demonstrate the modelling results for different passive mitigation scenarios in line with the cooling hierarchy. Active cooling is proposed which adds to the urban heat island effect. This is not supported without proper justification.

Overall, the submitted overheating strategy is not acceptable.

5. Sustainability

Urban Greening / Biodiversity

The submitted design and access statement shows the Urban Greening Factor for the site is calculated to be 0.41 and therefore meets the recommended target of 0.4 in line with Policy G5.

6. Planning Conditions

To be secured with amendments expected to the wording below once the revised information has been submitted.

Energy strategy

The development hereby approved shall be constructed in accordance with the Sustainability & Energy Statement Revision P04 prepared by Buro Happold (dated 30 Nov 2023) delivering a minimum 15% improvement on carbon emissions over 2021 Building Regulations Part L, with SAP10.2 emission factors, high fabric efficiencies, DEN connection, and a minimum 65 kWp solar photovoltaic (PV) array.

(a) Prior to above ground construction, details of the Energy Strategy shall be submitted to and approved by the Local Planning Authority. This must include:

	- <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 5% reduction with SAP10.2 carbon factors; it is advised to improve this aiming for the minimum 15% reduction.</i> - <i>Details to reduce thermal bridging;</i> - <i>Explore further ways to minimise the Energy Use Intensity including but not limited to incorporating waste-water heat recovery;</i> - <i>Location, specification and efficiency of the proposed alternative low carbon heating system (Coefficient of Performance, Seasonal Coefficient of Performance, and the Seasonal Performance Factor), with plans showing the pipework and noise and visual mitigation measures;</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, location of any additional equipment installed to reduce carbon emissions for example MVHR;</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> <i>DEN Connection</i> <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>	
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- *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.);*
- *Peak heat load calculations in accordance with CIBSE CP1 Heat Networks: Code of Practice for the UK (2020) taking account of diversification.*
- *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;*
- *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;*
- *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;*
- *Details of the location for building entry including dimensions, isolation points, coordination with existing services and detail of flushing/seals;*
- *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;*
- *Details of a future pipework route from the temporary boiler location to the plant room.*

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.

Metering strategy

Prior to the completion of the superstructure a quality assured metering plan, shall be submitted to and approved by the Local Planning Authority, this shall include:

- (a) *relevant smart metering schematics for the individual Dwellings, commercial units, landlord areas, plant/energy centre area(s);*

- (b) information on third-party quality assurance mechanisms for the metering installation that follow industry best practice at the time of submission;*
- (c) correct calibration and operation that will measure and report the required data for each reportable unit in line with the Be Seen guidance, including metering information for the building energy consumption, energy centre performance, utility meters, renewable energy generation, battery storage and electric vehicle technologies, and exported energy.*

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.

Overheating (Student Accommodation)

- (a) Prior to the commencement of development, an overheating model and report shall be submitted to and approved by the Local Planning Authority. The model will assess the overheating risk in line with CIBSE TM59 (using the London Weather Centre TM49 weather DSY1-3 files for the 2020s, and DSY1 for the 2050s and 2080s) and demonstrate how the overheating risks have been mitigated and removed through design solutions. These mitigation measures shall be operational prior to the first occupation of the development hereby approved and retained thereafter for the lifetime of the development. Air conditioning will not be supported unless exceptional justification is given.*

This report shall include:

- Remodelling of units, communal areas, and corridors based on CIBSE TM59, using the CIBSE TM49 London Weather Centre files for the DSY1-3 (2020s) and DSY1 2050s and 2080s, high emissions, 50% percentile;*
- Demonstrating the mandatory pass for DSY1 2020s can be achieved by meaningfully following the Cooling Hierarchy and in compliance with Building Regulations Part O, demonstrating that any risk of crime, noise and air quality issues are mitigated appropriately evidenced by the proposed location, specification and modelling results of the measures;*
- Specify the shading strategy, including technical specification and images of the proposed shading feature (e.g. overhangs, Brise Soleil, or external shutters).*
- Provide the elevations and sections plans to show where these measures are proposed.*
- Include images indicating which sample units were modelled and floorplans showing the modelled internal layout of dwellings.*

- *A Retrofit Plan; Modelling of mitigation measures required to pass future weather files, clearly setting out which measures will be delivered before occupation and which measures will form part of the retrofit plan; and Confirmation that the retrofit measures can be integrated within the design (e.g., if there is space for pipework to allow the retrofitting of cooling and ventilation equipment), setting out mitigation measures in line with the Cooling Hierarchy;*
- *Confirmation who will be responsible to mitigate the overheating risk once the development is occupied.*

If the design of development 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.

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.

Overheating (non-residential)

At least six months prior to the occupation of each non-residential area, an Overheating Report must be submitted to and approved by the Local Planning Authority if that space is to be occupied for an extended period of time or will accommodate any vulnerable users, such as office/workspace, community, healthcare, or educational uses.

The report shall be based on the current and future weather files for 2020s, 2050s and 2080s for the CIBSE TM49 central London dataset. It shall set out:

- *The proposed occupancy profiles and heat gains in line with CIBSE TM52*
- *The modelled mitigation measures which will be delivered to ensure the development complies with DSY1 for the 2020s weather file.*
- *A retrofit plan that demonstrates which mitigation measures would be required to pass future weather files, with confirmation that the retrofit measures can be integrated within the design.*

The mitigation measures hereby approved shall be implemented prior to occupation and retained thereafter for the lifetime of the development.

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.

Building User Guide

Prior to occupation, a Building User Guide for the 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 for different heatwave scenarios. The Building User Guide should be easy to understand, and will be issued to any residential occupants before they move in, and should be kept online for residents to refer to easily.

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.

BREEAM Certificate

(a) Prior to commencement of above ground works, 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.

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.

(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.

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.

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.

Living roofs

(a) Prior to the above ground commencement of development, details of the living roofs must be submitted to and approved in writing by the Local Planning Authority. Living roofs must be planted with flowering species that provide amenity and biodiversity value at different times of year. Plants must be grown and sourced from the UK and all soils and compost used must be peat-free, to reduce the impact on climate change. The submission shall include:

- i) A roof plan identifying where the living roofs will be located;*
 - ii) A section demonstrating settled substrate levels of no less than 120mm for extensive living roofs (varying depths of 120-180mm), and no less than 250mm for intensive living roofs (including planters on amenity roof terraces);*
 - iii) Roof plans annotating details of the substrate: showing at least two substrate types across the roofs, annotating contours of the varying depths of substrate*
 - iv) Details of the proposed type of invertebrate habitat structures with a minimum of one feature per 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;*
 - 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);*
 - vi) Roof plans and sections showing the relationship between the living roof areas and photovoltaic array; and*
 - vii) Management and maintenance plan, including frequency of watering arrangements.*
 - viii) A section showing the build-up of the blue roofs and confirmation of the water attenuation properties, and feasibility of collecting the rainwater and using this on site;*
- (b) Prior to the occupation of 90% of the development, evidence must be submitted to and approved by the Local Planning Authority that the living roofs have been delivered in line with the details set out in point (a). This evidence shall include photographs demonstrating the measured depth of substrate, planting and biodiversity measures. If the Local Planning Authority finds that the living roofs have not been delivered to the approved standards, the applicant shall rectify this to ensure it complies with the condition. The living roofs shall be retained thereafter for the lifetime of the development in accordance with the approved management arrangements.*

Reason: To ensure that the development provides the maximum provision towards the creation of habitats for biodiversity and supports the water retention on site during rainfall. In accordance with London Plan (2021) Policies G1, G5, G6, SI1 and SI2 and Local Plan (2017) Policies SP4, SP5, SP11 and SP13.

Biodiversity

(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.

(b) Prior to the occupation of development, photographic evidence and a post-development ecological field survey and impact assessment shall be submitted to and approved by the Local Planning Authority to demonstrate the delivery of the ecological enhancement and protection measures is in accordance with the approved measures and in accordance with CIEEM standards.

Development shall accord with the details as approved and retained for the lifetime of the development.

Reason: To ensure that the development provides the maximum provision towards the creation of habitats for biodiversity and the mitigation and adaptation of climate change. In accordance with London Plan (2021) Policies G1, G5, G6, SI1 and SI2 and Local Plan (2017) Policies SP4, SP5, SP11 and SP13.

Urban Greening Factor

Prior to completion of the construction work, an Urban Greening Factor calculation should be submitted to and approved by the Local Planning Authority demonstrating a target factor of 0.41 has been met through greening measures.

Reason: To ensure that the development provides the maximum provision towards the urban greening of the local environment, creation of habitats for biodiversity and the mitigation and adaptation of climate change. In accordance with London Plan (2021) Policies G1, G5, G6, SI1 and SI2 and Local Plan (2017) Policies SP4, SP5, SP11 and SP13.

	7. Planning Obligations Heads of Terms - Be Seen commitment to uploading energy data - Energy Plan - Sustainability Review - Estimated carbon offset contribution (and associated obligations) - DEN connection (and associated obligations) - To install solar PV in the roof area reserved for the low-carbon heating solution if connecting to the DEN. - Heating strategy fall-back option if not connecting to the DEN - Deferred carbon off-set contribution *** Carbon Management Response 10/11/2023 In preparing this consultation response, we have reviewed: • Sustainability & Energy Statement Revision P03 (includes overheating analysis) prepared by Buro Happold (dated 21 Aug 2023) • Relevant supporting documents. 1. Summary The development achieves an on-site carbon dioxide reduction of 10% with a connection to District Energy Network (DEN) and 16% with onsite heat pump. The applicant should explore more options to improve the fabric energy efficiency aiming to 15% reduction under Be Lean and maximise on-site renewable energy generation under Be Green scenario. Furthermore, the overheating assessment fails to adequately assess the overheating risks throughout the development and modelling against future weather files is missing. Carbon Management cannot currently support this application. The development does not currently meet: • London Plan Policy SI2: Be Green – Minimising greenhouse gas emissions and maximising opportunities for renewable energy by producing, storing, and using renewable energy on-site; • Local Plan SP4: working towards a low carbon Haringey and 20% carbon dioxide emission reduction from on-site renewable energy generation; • London Plan Policy SI4 and Local Plan DM21: no dynamic thermal modelling was undertaken to reduce the overheating risk and reduce the impact on the urban heat island. • London Plan Policies G5, G6 and Local Plan DM21: no urban greening or biodiversity net gain.	
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Further information needs to be provided to address this objection, in relation to the Energy, Overheating and Sustainability Strategy. This should be addressed prior to the determination of the application.

2. Energy Strategy

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

The overall predicted reduction in CO₂ emissions for the development shows an improvement of approximately 10% in carbon emissions with SAP10.2 carbon factors, from the Baseline development model with connection to DEN. This represents an annual saving of approximately 3.1 tonnes of CO₂ from a baseline of 30.5 tCO₂/year.

London Plan Policy SI2 requires major development proposals to calculate and minimise unregulated carbon emissions, not covered by Building Regulations. The applicant has not reported the unregulated emissions.

Non-Residential	Scenario 1: DEN			Scenario 2: ASHP		
<i>(SAP10 emission factors)</i>	Total regulated emissions (tCO ₂ /year)	CO ₂ savings (tCO ₂ / year)	Percentage savings (%)	Total regulated emissions (tCO ₂ /year)	CO ₂ savings (tCO ₂ /year)	Percentage savings (%)
Part L 2021 Baseline	30.5			46.1		
Be Lean savings	29.1	1.4	5%	46.1	0.0	0%
Be Clean savings	29.1	0.0	0%	44.6	1.5	3%
Be Green savings	27.4	1.7	6%	38.9	5.7	12%
Cumulative savings		3.1	10%		7.2	16%
Carbon shortfall to offset (tCO₂)	27.4			38.9		
Carbon offset contribution	£95 x 30 years x 27.4tCO ₂ /year = £78,090			£95 x 30 years x 38.9tCO ₂ /year = £110,865		

10% management fee	£7,809	£11,086.5
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Actions:

- Please submit a completely filled GLA's Carbon Emission Reporting Spreadsheet.
- Please submit BRUKL sheets for a representative selection of the development for the Baseline scenarios.
- What is the calculated Primary Energy Factor?

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.

Building type	EUI (kWh/m ² /year)	Space Heating Demand (kWh/m ² /year)	Methodology used

Actions:

- What is the calculated Energy Use Intensity (excluding renewable energy)? How does this perform against GLA benchmarks, i.e. at 55 kWh/m²/year? Please submit the information in line with the GLA's reporting template.
- What is the calculated space heating demand? How does this perform against the GLA benchmark of 15 kWh/m²/year? Please submit the information in line with the GLA's reporting template.

Energy – Lean

London Plan Policy SI2 requires non-residential developments to improve emissions by at least 15% under Be Lean. As per the DEN scenario, the applicant has proposed a saving of 1.4 tCO₂ in carbon emissions (5 %) through improved energy efficiency standards in key elements of the build, based on SAP10.2 carbon factors. This goes against the Energy Hierarchy and requirement to take a fabric first approach in line with London Plan Policy SI2 and Local Plan Policy SP4. The development relies solely on DEN to meet its energy targets and compensate for its poor performance under Be Lean. This is not supported.

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

Floor u-value	0.11 W/m ² K
External wall u-value	0.14 W/m ² K
Roof u-value	0.11 W/m ² K
Door u-value	1.00 W/m ² K
Window u-value	1.00 W/m ² K
G-value	0.30
Air permeability rate	3 m ³ /hm ² @ 50Pa
Ventilation strategy	Mechanical ventilation with heat recovery (MVHR 85% efficiency; 1.0 W/l/s Specific Fan Power)
Waste Water Heat recovery?	No
Thermal bridging	25% degradation of u-value
Low energy lighting	100%

Actions:

- Please identify on a plan where the MVHR units will be located within the dwellings. The units should be less than 2m away from external walls. This detail can also be conditioned.
- The fabric efficiencies and thermal bridging should be improved upon to reduce heat losses.
- If the air tightness of the scheme is improved, mechanical ventilation with heat recovery could be proposed to further reduce heat losses.
- Set out how the scheme's thermal bridging will be reduced. [if below 0.15, check how/why. No measures are proposed to reduce heat loss from junction details, and it does not set out the what the proposed Psi (Ψ) value is.
- What is the construction of the building and what is the assumed thermal mass?
- Provide the average % improvement on the FEES.
- Submit the individual end use BER for student housing and Class E use in line w CIBSE Guide F.

Overheating is dealt with in more detail below.

Energy – Clean

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

	boundary to supply energy to neighbouring existing and planned future developments. It requires developments to prioritise connection to existing or planned future DENs. The applicant has liaised with Energetik and have confirmed significant works in progress in relation to a new Meridian Water energy Centre and construction of main distribution networks. The energy centre located at the “Ecopark” North East of the HRW development will be operational in 2026. The development is 400 meters from the ‘to be installed’ DEN service within the Fore street, so the development is expected to secure connection subject to construction of the programme. The Be Clean strategy to connect to the DEN in Fore Street is generally acceptable. Some evidence should be provided that the DEN plant room is adequately sized for a substation. 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; 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 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 size, layout and schematics according to the standards. 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. Under the DEN scenario, a total of 1.7 tCO₂ (6%) reduction of emissions are proposed under Be Green measures with the installation of solar PV panels. An estimate of 165 panels would be mounted on a roof area of 486.5 m² covering 291.9m².	
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	Under ASHP scenario, a communal air-to-water ASHP systems (min. SCOP of 2.5) and SEER of 4.21 will provide hot water, heating, and cooling to the development. <u>Actions:</u> - Please provide some commentary on how the available roof space has been maximised to install solar PV. Has your feasibility shown that other roofs will not be viable / will they be used for other purposes? Only 60% of the roof space has been used. This can be further increase with spaces for shading, access, and maintenance. - What is the peak output of the PV array, how much of the roof area will be covered approximately, what is the assumed efficiency, angle and orientation of the panels? - How will the solar energy be used on site (before surplus is exported onto the grid)? - 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 alternative low carbon system be located and how the units will be mitigated in terms of visual and noise impact. 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 non-residential unit. A public display of energy usage and generation should also be provided in the main entrance area to raise awareness of residents/businesses. Energy metering will be provided to meet the requirements of the Building Regulations 2021, CIBSE TM39, Metering Instruments Directive (MID) Class 2 Accuracy and the “Be Seen” strategy for the GLA. Smart energy meters/ energy display devices will be installed which have the ability to be read remotely. <u>Actions:</u> - Please demonstrate how the sub-metering will be implemented for student housing and commercial use spaces. - Demonstrate that the planning stage energy performance data has been submitted to the GLA webform for this development: (https://www.london.gov.uk/what-we-	
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[do/planning/implementing-london-plan/london-plan-guidance/be-seen-energy-monitoring-guidance/be-seen-planning-stage-webform\)](#)

3. Carbon Offset Contribution

A carbon shortfall of 27.4 tCO₂/year remains. 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. Two carbon offset payments will be calculated. The carbon offset contribution for scenario 1 will be due at the commencement of development and the difference in the offset contribution between the first and second scenarios will be deferred for 10 years and indexed accordingly.

1. Payment for the residual emissions in the DEN scenario (Scenario 1) would be due at commencement of development.
2. A deferred carbon offset contribution is calculated through the difference in the offset contribution: Scenario 2 – Scenario 1 = Deferred Payment.
3. If, after 10 years the development has not connected to the DEN, the deferred payment (+indexation) is due.
4. If, after 10 years the development has connected to the DEN, the deferred payment would not be due but this amount would be available as a connection charge to the DEN.

The initial carbon offset contribution amount is expected to decrease, and the deferred carbon offset would therefore increase. The revised figures will be established through the Energy Plan process in the s106 which includes an updated carbon offset calculation prior to commencement.

The Section 106 agreement will set out within what timeframe the Deferred Carbon Offset payment would be payable, based on the ultimate date by which the development should confirm whether they connect to the DEN.

Connection charge

In the event that the scheme connects to the DEN, a connection charge should be payable. In order that this is reasonable, the charge will be capped as follows.

Maximum connection charge = deferred carbon offset contribution + any avoided costs of implementing the ASHP backup solution (depending on phasing, the ASHP solution may have been implemented in which case the avoided costs are zero). This is payable when they are connecting to the DEN.

An indicative offset contribution has been calculated below, however it is expected that further emissions are reduced under the Be Lean and Be Green stage for this development to be policy compliant.

	Carbon Offsetting Contribution (Connection to DEN scenario; tCO₂)	Carbon Offsetting Contribution (Communal ASHP scenario; tCO₂)
	Non-residential	Non-residential
Baseline	30.5	46.1
Total cumulative savings per annum (tCO ₂ , %)	(10 %)	(16%)
Shortfall to offset	27.4	38.7
Carbon offset payment due for scenario	£95 x 30 years x 27.4tCO ₂ /year = £78,090 (+10% management fee)	£95 x 30 years x 38.9tCO ₂ /year = £110,865 (+10% management fee)
Carbon Offsetting Contribution payment due at commencement of development	£78,090 (+10% management fee)	
Deferred Carbon Offsetting Contribution (+indexation) payment due <u>if not connecting to the DEN</u>	£32,775 (+10% management fee)	

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.

In accordance with the Energy Assessment Guidance, the applicant has undertaken a dynamic thermal modelling assessment in line with CIBSE TM59 with TM49 weather files, and the cooling hierarchy has been reported to be followed in the design. It is not clear how many rooms and communal spaces were modelled.

Due to the noise constraints of this site being adjacent to High Road, the TM59 criteria for predominantly mechanically ventilated dwellings apply (assuming windows need to remain closed).

Results are listed in the table below.

	Windows Opening	% bedrooms passing TM59 – criterion A (<3% hours of overheating)	% bedrooms passing TM59 – criterion B hours >26°C (pass <33 hours)
DSY1 2020s	100 mm restriction	73.8%	0.00%
DSY1 2020s	30° opening	100%	22.3%
DSY1 2020s	50° opening	100%	94.5%
DSY1 2020s	70° opening	100%	100%
DSY1 2020s	90° opening	100%	100%
DSY2 2020s	Not Modelled	Not Modelled	Not Modelled
DSY3 2020s	Not Modelled	Not Modelled	Not Modelled
DSY1 2050s	Not Modelled	Not Modelled	Not Modelled
DSY1 2080s	Not Modelled	Not Modelled	Not Modelled

Active cooling is proposed which is not supported.

Overall, the submitted overheating strategy is not acceptable.

Overheating Actions:

- It is unclear which weather file is used for the assessment. Redo the overheating modelling with the Central London weather file for bedrooms, communal spaces and commercial units of the development, which will more accurately represent the urban heat island effect following the guidelines as per [the Haringey's Key Overheating Planning Application Requirements](#).
- Due to the acoustic constraints of this site being adjacent to High Road, the TM59 criteria for mechanical ventilated buildings apply.
- Undertake further modelling:
 - o Model the 2020s DSY 2 and 3 and DSY1 for the 2050s and 20280s. Ensure the design has incorporated as many mitigation measures to pass these more extreme and future weather files as far as feasible. Any remaining overheating risk should inform the future retrofit plan.
 - o All single-aspect rooms facing west, east, and south;
 - o At least 50% of rooms on the top floor;
 - o 75% of all modelled rooms facing South or South/West;

	○ Rooms closest to any significant noise and / or air pollution source, with windows closed at all times (with cross reference to the Noise and the Air Quality Assessments to demonstrate the most sensitive receptors and the <u>AVO Residential Design Guide</u>); ○ Habitable communal spaces (e.g. communal living/dining rooms; ○ Communal corridors, where pipework runs through; ○ Commercial/office areas, particularly where they will be occupied for a longer period of time. Assuming that active cooling will be provided is not sufficient. If the proposed uses are not yet clear, this aspect can be conditioned to ensure that the modelling is based on the potential future occupiers.; - The applicant must demonstrate that the risk of overheating has been reduced as far as practical and that all passive measures have been explored, including reduced glazing and increased external shading. The applicant should also outline a strategy for residents to cope in extreme weather events, e.g. use of fans. Mitigation measures - Please demonstrate the cooling hierarchy has been followed meaningfully by incorporating the installation of further passive measures, particularly solar shading (overhangs, external shutters, brise soleil) throughout the development. - Specify the shading strategy, including technical specification and images of the proposed shading feature (e.g. overhangs, Brise Soleil, and external shutters). - Provide the elevations and sections plans to show where these measures are proposed. - Include images indicating which sample units were modelled and floorplans showing the modelled internal layout of dwellings. Retrofit plan - Set out a retrofit plan for future and more extreme weather files, demonstrating how these measures can be installed at a later date within the proposed design, how they would reduce the overheating risk, what their lifecycle replacement will be, and who will be responsible for overheating risk. - Identify communal spaces (indoor and outdoor) where students can cool down if their bedrooms are overheating. - Confirm who will own the overheating risk when the building is occupied (not the residents). - This development should have a 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	
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	and wellbeing, materials and waste, embodied carbon, water consumption, flood risk and drainage, biodiversity, climate resilience, energy and CO2 emissions and landscape design. <u>Action:</u> - Set out what urban greening and biodiversity enhancement measures will be proposed (e.g. green infrastructure, bird boxes, bat boxes etc to connect to the green spaces around the site, living roofs, living walls, etc.) - A target (%) for responsible sourced, low-impact materials used during construction. - Climate change mitigation should also be considered for the external spaces (shading, etc) and the impact of the increase in severity and frequency of weather events on the building structures. <i>Non-Domestic BREEAM Requirement</i> 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. Based on this report, a score of 58.5 % is expected to be achieved, equivalent to 'Very Good' rating. Targeting such a marginal score will risk not achieving 'Very Good' as a very minimum and does not demonstrate the ambition to deliver a more sustainable development and should take necessary steps to achieve higher score. The report shows a potential score of above 70% could be achieved, which should be targeted. <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. Urban Greening Factor and Biodiversity Net Gain has not been submitted. <u>Action:</u> - Please submit the Urban Greening Factor - <u>Please provide the biodiversity net-gain calculation.</u> It is recommended to use the Biodiversity Metric 4.0. The calculation tools and user guide for the biodiversity metric are	
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	published on Natural England's Access to Evidence website. The user guide describes how to gather the information needed for the metric calculations. https://nepubprod.appspot.com/publication/6049804846366720 6. Planning Conditions To be secured with amendments expected to the wording below once the revised information has been submitted. - Energy strategy - Overheating - BREEAM Certificate - Biodiversity 7. Planning Obligations Heads of Terms - Be Seen commitment to uploading energy data - Energy Plan - Sustainability Review - Estimated carbon offset contribution (and associated obligations) - DEN connection (and associated obligations) - Heating strategy fall-back option if not connecting to the DEN	
LBH Conservation Officer	Dear Phil, The proposed works include internal and external alterations to grade II listed buildings at Nos 819/821 High Road including façade works, internal alterations and reinstatement of hipped roof, demolition works to the rear so to redevelop for purpose-built student accommodation and supporting flexible commercial, business and service uses. Works also include hard and soft landscaping, parking, and associated works. The development site is located to the west of the North Tottenham Conservation Area which is characterised as an almost intact 19th century townscape incorporating notable surviving examples of earlier periods. Despite a few changes, the townscape of this part of the High Road retains a high degree of historical continuity and displays a notable variety and contrast in architectural styles and materials. The Conservation Area includes the best surviving townscape section of the High Road as well a distinctive sequence of 18th and 19th century buildings, some statutory listed, including properties at Nos. 790 to 802, and 808-810, and some locally listed that create a densely built, almost continuous frontage of two-three storey historic buildings that greatly contribute to the sense of enclosure and character of the historic High Road.	Support noted.

	The site comprises part of the west side of the historic street frontage of the North Tottenham Conservation Area formed by locally listed and nationally listed buildings at Nos 819-829 High Road, and extends further to the west, beyond the Conservation Area boundary and includes the Peacock Industrial estate and Builders Yard. The site is currently in commercial and residential use with the grade II listed 819-821 Georgian properties hosting a mix of commercial uses on the ground floor and residential uses above. It is fundamental to consider that the urban and architectural context of the development site and related heritage assets is rapidly changing with the Tottenham Hotspur Football Club stadium and related ancillary buildings now dominating the street scene of the east side of the High Road; the design of further consented development on land surrounding the Stadium is being finalised and the approved High Road West masterplan has also established the emerging urban scale that will immediately surround the proposed development site. The site is also located in the setting of some of the most highly graded and best-preserved Georgian houses forming part of the remarkable Northumberland terrace at Nos 790-810, located on the opposite side of the Tottenham High Road frontage. Properties at Nos 819-821 are grade II listed as an early C18, relatively well-preserved pair of three-storey Georgian townhouses with late C19 shops on the ground floor and a symmetric façade composition complemented by original features. These buildings have been progressively converted, redeveloped, altered externally and to a greater degree internally and have lost their original use. But despite all these alterations this pair retains many original C18 features and the legibility of their original façade and spatial composition that still contribute to their special interest and historic character. These properties are in relatively good conditions having been in continued use over recent years and have benefited from regular standard maintenance after having been substantially refurbished in the late 1980s. The shopfronts have been partially altered, then reconstructed and have lost the original decoration and architectural qualities. The significance of the listed houses rests on their most intact original features that bear high aesthetic and historic value, while their surviving shopfronts are of medium value both and as a group. The locally listed C19 buildings at 823 - 829, although of more modest intrinsic architectural and historic special interest, are interesting two-storey buildings that bear group value and positively contribute to the varied character of the Conservation Area. The properties have been internally and externally substantially altered over the centuries, substantial roof replacements and repairs have been carried out, however the elevations and related architectural features are in generally good conditions with some decay towards the top and to the shopfront apparently due to roof	
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	defects. Insensitive rendering has generally obscured some of the decorative features to front and both front and rear elevations seem to suffer from water infiltration due to poor roof detailing. The rear of these buildings is altered and cluttered, obtrusively located satellite dishes and services contribute to detract from the character of the buildings, while property at No 829 is a poor quality early C20 replacement building, with later flat roof and flat roofed extensions along Brunswick Square. The significance of the buildings at 823-827 High Road derives from the quality of their facade composition, architectural detailing, and surviving C19 shopfront that positively contribute to the street frontage of this part of the Conservation Area. These buildings have medium aesthetic and historic value consistently with their local listing and importance. The submitted heritage statement and related map drawings illustrating the heritage significance of the listed buildings forming part of this application very helpfully illustrate the historic development of the heritage buildings impacted by this proposal and their hierarchy of significance. It is apparent throughout the heritage related analysis and descending development proposal that a thorough understanding of the conditions and significance of heritage assets have informed the development proposal so to retain, enhance and where necessary reinstate the original features of the heritage assets forming part of this development proposal. The proposed development responds to the wider regeneration strategy and emerging built scenario for the area as set out in the High Road West Masterplan Framework that does not include the High Street frontage, but provides guidance in terms of massing, heights and uses for new development to be enabled at the back of the historic frontage of the High Road with new buildings that sensitively complement the established urban scale with a transitional new height. The principle of redevelopment with a progressive increase in height on the currently light industrial site at the back of the historic frontage descends from the adopted masterplan and is therefore accepted in principle from conservation grounds. Map regression, condition surveys and historic evidence accompanying the application, convincingly demonstrate that the progressive alteration of the historic buildings still surviving on site and the deterioration of both the architectural and urban design qualities of the site at the back, which has slowly yet dramatically shifted from its originally Georgian and Victorian residential character to the current very utilitarian light industrial character, provides an opportunity for enhancement of the adjacent heritage assets through well- detailed and sensitive refurbishment and high quality redevelopment in their setting. The application convincingly articulates the heritage significance of the affected heritage assets and assesses the impact of the proposed refurbishments, demolition works and erection of new buildings on the listed and locally listed properties.	
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	Accordingly, the proposed works include internal and external alterations to grade II listed buildings at Nos 819 - 821 High Road so to enable the conversion of these properties into student accommodation and commercial services. The proposed scheme also includes the demolition of the locally listed building at No 829 High Road, the demolition of the existing buildings and structures located at the back of these listed and locally listed buildings so to enable the ancillary space, amenity space, and a range of flexible commercial uses as well as hard and soft landscaping and parking. The design proposal has been developed and sensitively refined to create high quality accommodation, landscape and landscape as part of the new development while striving to retain the special interest and significance of both the Conservation Area and its contributing designated and non-designated heritage assets and the overall scale, mass and gradual increase in height of the proposed development have been comprehensively illustrated and tested in contextual elevations, cross-sections and views taken both across the Conservation Area and along its historic frontage and have convincingly demonstrated that the impact of the proposed development on the heritage frontage of the High Road is modest, especially in comparison to the much taller and denser emerging development envisaged by the masterplan for this regeneration area, and would lead to a low level of less than substantial harm to the significance of the Conservation Area. The impact of the proposed new increasingly taller buildings on the setting of the historic frontage of the Conservation Area is mitigated by the careful increase in mass and heights of the new development that is well set-back from the street frontage while the proposed landscaping works improve the public realm and connectivity between the High Road and the new development. Concurring with the findings of the heritage statement supporting the application, the proposed works to grade II listed 819-821 High Road will reinstate the original use of the buildings and will unveil their original architecture as fully legible and separate from the new development despite the overall increase of scale and height at its back and a progressively taller and more densely built wider context, by reversing those unsympathetic alterations that have been cumulatively carried out to the townhouses over many years, including removal of the rear extensions, the flat felt roof, cement render, overpainting, prominent services, satellite dishes and cabling. Heritage sympathetic repairs and reinstatement of original external and internal features, the removal of clutter and unsightly extensions, the reinstatement of the historic layout of the upper floors would re The redevelopment at the rear of 819-821 High Road will improve the built as well as the hard landscaped private and public spaces surrounding the listed buildings building would be enhanced by the repairs and refurbishment.	
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	The proposed works to the locally listed buildings at Nos 823-827 will declutter their frontages and rear elevations by removing unsympathetic extensions, doors and windows and will repair their historic fabric and facades, will sensitively reinstate original chimneys, doors, windows, and fixtures this leading to a significant enhancement of the quality of these buildings. The locally listed building at 829 High Road is a much altered and poorly designed Edwardian building that has lost most of its original features such as roof, chimneys, elevations and has low heritage value. As a corner building fronting the High Road in Conservation Area and extending to the rear along Brunswick Square, Its proposed demolition has been debated throughout the pre-application process and although undesirable, is proving necessary to create an appropriate vehicle and pedestrian access to the development site from the High Road along Brunswick Square which is currently poorly maintained and insufficient to provide public access and to maximise the importance of Brunswick Square as a key east-west pedestrian route that connects the High Road with the remainder of the masterplan area to the west. The loss of this locally listed building of modest heritage value and the alteration of the narrow alleyway at Brunswick Square, both meant to be positive components of the character of the Conservation Area, would lead to a low level of less than substantial harm to the significance of the Conservation Area, however we agree with the findings of the submitted heritage statement and impact assessment that highlight how this low level of harm, besides being justified and necessary to provide adequate access to the development site, would be outweighed by the proposed enhancements to the fabric and setting of the more valuable heritage buildings, by the provision of a well-designed access route into the site and by descending public benefits. The proposed redevelopment of the light industrial site, together with the proposed refurbishment of the listed and locally listed buildings that significantly contribute to the street frontage of the Conservation Area and to the landscaped reconfiguration of Brunswick Square would largely conserve the significance of the listed and locally listed buildings, would enhance the quality of this part of the conservation area and would significantly enhance the setting of both listed and locally listed buildings. However, the erection of new, large buildings at the back of the High Road and the proposed demolition of the locally listed building at 829 High Road will lead to a low level of less than substantial harm to the significance of the Conservation Area and the test set out at paragraph 196 of the NPPF should apply with due consideration of the heritage benefits and wider public benefits provided by the proposed scheme. The application provides a comprehensive set of information related to new development and its materiality, however, method statement for the proposed demolitions affecting locally listed and nationally listed buildings, together with detail drawings, material specification and material samples	
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	of proposed repairs, replacements and built alterations to heritage buildings should be submitted for approval as part of planning conditions. Kind Regards, Elisabetta Elisabetta Tonazzi ARB RIBA Conservation Architect Principal Conservation Officer Placemaking and Housing Haringey Council	
LBH Design Officer	<u>HGY/2023/2306 - 819-829 High Road, Tottenham, London, N17 8ER</u> <i>Full planning application for the demolition of existing buildings and structures to the rear of 819-829 High Road; the demolition of 829 High Road; and redevelopment for purpose-built student accommodation (Sui Generis) and supporting flexible commercial, business and service uses (Class E), hard and soft landscaping, parking, and associated works. To include the change of use of 819-827 High Road to student accommodation (Sui Generis) and commercial, business and service (Class E) uses.</i> Applicant: Tottenham Hotspur Football & Athletic Co Ltd Agent: Quod Architects: F3 Architects LLP <u>Summary</u> These proposals, for a site identified for development in Site Allocations and several Masterplans, albeit with retention and restoration of the buildings fronting the High Road, are a change of function, with only minor design changes, to a previously approved residential lead mixed use scheme, including a cinema, by the same applicant and design team. The previous approval was considered a well thought through and elegantly designed response to this site, of appropriate height, bulk and massing, elegant and attractive form, proportions and fenestration, appropriate to the heritage significance of the retained buildings in the site and the setting of the High Road, an important part of the North Tottenham Conservation Area, and attractive, durable materials, all aspects of which are either unchanged or not changed in any detrimental way. The different use now proposed, for purpose-built student accommodation (PBSH), is not a use specifically identified in the site allocation or previous masterplans that covered this site, but is in principle a use compatible with this emerging town centre location, the wider masterplans and nearby	Support noted.

	applications previously approved and adopted and the heritage significance of this sensitive stretch of the High Road. The design of this PBSA, as a double courtyard, is a very convincing form of student accommodation, bearing obvious similarities to the time-honoured and highly regarded “Oxbridge College” form and typology that has long been proved to provide comfortable and inspirational student accommodation, with the required security and community character, in a vibrant town centre setting. Its amenity for residents, practical design and impacts on neighbours are shown to be acceptable. In addition to the usual conditions on details and materials, a condition would be recommended to ensure public realm created by this development is adoptable or indistinguishable from the public realm created by neighbouring developments in the rest of the wider masterplans, with matching surface treatments and street furniture and no restrictions on access and use different to the rest of the completed masterplan <u>Principal of Development, and Masterplanning and Street Layout</u> 1. The site forms part of Site Allocation NT5 from the Tottenham AAP (adopted July 2017) and the related High Road West Masterplan Framework, and is at least part included in approved masterplans for the Goods Yard and Depot and High Road West schemes. This same applicants’ Goods Yard and Depot planning permission (HGY/2022/0563, following earlier applications) is detailed permission was accompanied with an illustrative masterplan that included all of the northern half of the NT5 site allocation, including all of this application site. The High Road West approval (HGY/2021/3175) covers virtually the whole of the site allocation, about twice the area as the Goods Yard & Depot masterplan, but excluding several buildings facing the High Road, including those that are part of this site. These applicants also have planning permission for a somewhat smaller site at no 807 High Road, to the south of this site; that site is also within the Site Allocation, Masterplan Framework and Goods Yard/Depot illustrative masterplan, and half in, half out of the High Road West masterplan, for residential lead mixed uses part-in, part-behind the High Road frontage. 2. This is not the first proposal by this applicant for this site. The same team applied for and received planning permission for a residential lead mixed use scheme, with a cinema and other business uses on most of the ground floor, at the Planning Sub-Committee of 10th January 2022 (HGY/2021/2283). This was a very similar scheme in bulk, height, massing and design, including landscaping to the surrounding public realm. The main change is to use; the cinema and residential in the approved scheme is to be replaced by purpose-built student accommodation (PBSA). In design terms the main change is that the two courtyard spaces are no longer to be at podium level, with cinema and back of house (for both cinema and residential) ancillary accommodation and extensive parking occupying virtually the whole of the ground floor and a large basement. Instead, both courtyards will descend to ground level, and	
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	with no basement, be landscaped, and there will be much less parking, although about the same amount of servicing. 3. The applicants' previously approved cinema & residential scheme was broadly in accordance with the site allocation, masterplan framework, the masterplans that accompanied the Goods Yard & Depot and High Road West schemes. The different use now proposed, for PBSH (purpose-built student accommodation), is not a use specifically identified in the site allocation or previous masterplans that covered this site, but is in principle a use reasonably compatible with this emerging town centre location and of the emerging masterplan for active town centre frontage along the High Road frontage with related ancillary uses immediately behind, transitioning to a higher density, higher rise but predominantly residential use to the western edges of the masterplans' areas. This PBSA proposal does not contain the employment focussed "yard spaces" envisaged immediately behind the High Road in full, with potential for north-south connections through the yards, parallel to the High Road, but nor did the previous (extant) planning approval for this site, and this has been one of the most difficult aspirations from the original masterplan framework to maintain in real planning applications; this proposal does at least provide the physical form of courtyard spaces. 4. The site is part in and part just outside of the North Tottenham Conservation Area, which covers all the buildings along the site's High Road frontage, and are all Statutorily or Locally Listed or assessed as Positive Contributors to the Conservation Area. The Conservation Officer will provide an assessment and comments on the proposals from a heritage and building conservation point of view. However, in design terms it can be noted that the main entrance and most public facing facilities of the PBSA, as well as associated town centre facing retail/leisure uses are very appropriately and attractively accommodated in restored and repaired ground floor traditional shopfronts to these existing buildings, whilst the proposed residential above, connected to the PBSA, should be a successful use compatible with the sensitive heritage conversion of these buildings. 5. The site is just outside of the existing designated North Tottenham Local Centre, which is to the south up to Percival Court and for a greater length opposite, but is part of the existing retail frontage, with active retail frontage housing town centre uses within this and to both sides, by and large in vibrant, busy, active, town centre use despite not being so designated. It is intended that North Tottenham will become a new District Centre, incorporating the new High Road West developments on the High Road, White Hart Lane and the new Moselle Square, as well as the Spurs Stadium and related town centre developments and the existing local centre, and this PBSA, with its public facing ground floor communal uses and adjoining shop (like) units could also, along with its neighbouring busy active retail uses, could probably also form part of	
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	this district centre. This proposal will certainly be compatible with maintaining an active frontage of a torn centre character on this important part of the High Road. 6. The proposals would form most of a complete city block in the wider High Road West area, consisting of retained and restored existing buildings on the High Road and new build forming extended street frontages to the south side of the existing Brunswick Square alleyway and part of the north side of the existing Percival Court alleyway. The final side of the block would face the existing Peacock Industrial Estate. However, in the context of all of the envisaged masterplans, Brunswick Square and Percival Court would be extended as east-west streets further into the development and the boundary of this site and the Peacock Industrial Estate, the western edge of this proposed city block, would form a major north south street connecting White Hart Lane to the south to a major new public park starting at the north-west corner of this site and extending north. 7. All the approved masterplans and hybrid or detailed planning permissions for High Road West and the Goods Yard / Depot site contain visions for heights where height rises slowly from the retained existing 2-4 storey High Road (and White Hart Lane) frontages through mansion blocks of 5-8 storeys to tall and taller buildings only along the far western edge of the allocation site, against the railway (and away from White Hart Lane). Both the previous approval for this site and these proposals are modest in height and in accordance with these masterplanned height strategies. <u>Street Layout and Public Realm</u> 8. The High Road frontage represents the primary frontage of this development and is the most durable and simple to resolve side to the development. The existing buildings on the site along with the rest of the properties along this and the opposite side of the High Road, effectively from just north of the Tottenham Hotspurs Stadium to the south, as far as just south of the boundary of the borough to the north, form a consistent, well enclosed and defined “village core” to the North Tottenham Conservation Area and commercial heart of the local community, with a consistently built-up urban wall of buildings, many over 200 years old, including a high number of notable Statutorily and Locally Listed Buildings. The building line narrows the street at either end but widens out for much of the middle, including this site, the pavements are wide and have been recently and regularly repaved in high quality durable pavement requiring no improvement. In retaining and reusing nos. 819-827 with active frontages to public uses, this proposal will strengthen this good quality high street frontage. 9. The narrow entrances to the existing alleyways of Brunswick Square and Percival Court, like others along here, strengthen the sense of enclosure and distinctiveness of this stretch of the High Road. It is therefore regrettable that the applicants have found it necessary to propose demolition of no. 829, in order to make the entrance to Brunswick Square wide enough for	
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	essential servicing including fire engine access. In urban design terms this reduces the sense of enclosure, the fairly consistent street wall and the distinctive difference between this open-yet-enclosed stretch of the High Road and the narrow, claustrophobic alleyways. However, the proposal includes an archway over most of the width of no. 829, which will re-establish much of the sense of enclosure and street wall and provide a clear threshold transition to Brunswick Square. 10. The quality of the public realm and enclosing building architecture of both alleyways, Brunswick Square on the northern edge of the site and Percival Court just to its south, are currently poor, with unmade surfaces to some parts, poor quality tarmac to others, and complete lack of separate pedestrian pavement, whilst the enclosing buildings include blank walls, grills and shuttered doors in buildings of poor quality, badly maintained materials and finishes. Therefore, notwithstanding regret at the necessary widening of the entrance to Brunswick Square the development will <i>hugely</i> improve that side of the alleyway, with active frontage animated by entrances and ground floor windows, overlooking from residential windows and balconies on floors above and <i>much</i> improved surface materials, new street trees and street furniture to the part of their site they propose adding to the width of Brunswick Square, also providing a safe pedestrian zone. 11. Nevertheless, it is regrettable that the applicants have not agreed to improve the <i>whole</i> of the surface of Brunswick Square in the same materials (or similar matching but of adoptable standards, as it is Adopted Highway). It is also a shame that the existing buildings on the north side are generally of a poor architectural quality, although it does include one active shopfront, making what's currently the only good contribution to the streetscape of either alleyway. It is also regrettable that they have not agreed to contribute to improve Percival Court, although that is understood to be trickier as it is not adopted and of uncertain ownership, but it <i>is</i> welcomed that the area of turning head / circulation space in their south-west corner is detailed as a continuation of the public realm of this alleyway, albeit in better materials, and no longer proposed to be gated, except for the single disabled residents' parking space and alleyway off to the northern side off Percival Court, which will be gated and for legitimate users only. 12. The path up their western side, labelled as "Peacock Mews", is intended as the "meanwhile" gated approach to the front doors of the ground and first floor accommodation along that side, and is carefully and considerably detailed to provide a screen at ground level between those residential approaches, front doors and windows and the industrial activities of the neighbouring Peacock Industrial Estate. It is also capable of easily transitioning into being just the publicly open pavement along the east side of the primary north-south public street into the future development of the rest of the High Road West masterplan. The including of small ground floor commercial units at both north-west and south-west corners of the proposal would form ideal	
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	traditional “corner shops”, and if viable would further help integrate this into the completed masterplan and make a vibrant contribution to the new neighbourhood. 13. However, it is important to ensure by condition or otherwise that the public realm created in this development as extensions to Percival Court and Brunswick Square and their new Peacock Mews can be adopted or incorporated into the public realm of the wider masterplan, with matching surface treatments and street furniture and no restrictions on access and use different to the rest of the completed masterplan. I would recommend that the two alleyways, Brunswick Square and Percival Court, should eventually become pedestrian and cycle only at their eastern end, and otherwise have pedestrian pavements in the same stone or block paver and level (marked by a small kerb) as the vehicular roadway, whilst the street to the west of this site could be conventional. <u>Height, Bulk & Massing</u> 14. As mentioned above, the proposed height of the proposal confirms to what is envisaged in the masterplans with lower rise to match the retained existing High Road fronting buildings closest to them, then rising gradually to four, five and six storeys around the podium courtyard and seven at the north-western corner, an acceptable height within the meaning of the “mansion block” typology. These heights are likely to fit in well with the rest of the masterplan. The proposed height, bulk and massing also matches that approved in the applicants’ previous cinema and residential proposal. 15. In terms of bulk and massing, the proposals step in on all sides form the applicants red-line boundaries, although this is driven as much by necessity, to provide access, servicing and fire compliance, as it is inspired by a desire to avoid overcrowding the surroundings. Nevertheless the scale and bulk proposed is appropriate to the intended street frontages concerned, with the intended street to the west, where the proposed bulk and height of development is greatest, being the wider and more important, conventional street, and the scale and bulk of the Brunswick Square frontage here proposed noticeably reducing in both height and plan depth, commensurate with it being a narrow, tighter alleyway; even in its proposed, wider state. 16. Two ground floor courtyards are proposed; to the front (east) between the back of the retained High Road buildings (their later rear extensions having been removed) and the “central” wing that would also have gaps to its northern and southern sides; to the back (west) a mostly enclosed courtyard. The eastern courtyard would be of irregular shape, taking up the difference in alignment between the existing buildings on the High Road and the new, aligned with the western boundary (and future street), allowing the western courtyard garden to be rectangular and spacious.	
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	17. To the south, their boundary steps away from Percival Court, around nos. 813-817 High Road and their long rear projection that forms the northern frontage to most of Percival Court. This neighbour fills their site apart from a small, part covered yard at the western end, but is of only one storey and modern utilitarian construction, apart from the 3 storey Georgian High Road frontage. The proposal creates a narrow servicing and fire escape passageway between along their southern boundary. The eastern courtyard is open to the south except for a single storey wing, maintaining a separation to 813-7 except where 819 is joined on as existing. The northern side of the eastern courtyard is only enclosed by a three-storey wing with a gap to the rear of the existing 827 and a glazed link to the rest of the new development, giving the separation between the existing High Road frontages of heritage significance and the main new build a spacious quality. 18. Nevertheless, the southern end of the central wing and southern wing, enclosing the western court, form a close neighbour to the rear part of the side of 813-7, currently single storey but with its own development potential that could be impinged by this application proposal. The southern wing of this application scheme is also only of shallow plan depth and steps up gradually from four storeys at the southern end of the central wing, to five storeys only close to where it meets the western side, so that the south-eastern corner of the western podium garden gets only two storey. However, any development on that site would also be bound by the adopted masterplan, including maintaining a respectful lower of matching height to their High Road frontage until at least well back into their site. This application scheme contains a gap within their land between the rear of 813-7 and the projection at their south-western corner where they step out to the building line of the north side of Percival Court. The taller four and five storey parts of the southern would look onto the gap rather than the rear of 813-7. The proximity of this proposal can be seen as acceptable provided it is accepted that some communal living-dining-kitchens (only) in this south-eastern corner, where clusters would have dual aspect onto one of the two courtyards, could be very close to a reasonable neighbouring development. 19. At both western corners, the proposals rise up and mark the corners with an extra storey (six at the southern end, seven at the northern), marking what will become, in the masterplan, significant crossroad street corners and in the northern case also the southern end of the proposed new public park. In urban design terms this is an appropriate response to their intended location. They also mark the culmination of the very gradual stepping up and significant separation of new built form from the historic existing High Road frontage. <u>Form, Composition and Materiality</u> 20. Externally, the proposals will have slightly different fenestration and minor changes to form and roof profile, compared to the approved scheme, relevant to student housing rather than	
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	flats. These proposals follow a brick based architecture, using a simple palette of bricks suggested to be in harmony with those found in the surrounding neighbourhood, particularly in the High Road, most of which is an important Conservation Area with a number of statutorily listed buildings. This is proposed to be mostly a fairly dark, red brick around the northern, western and southern “outer” facades, with a lighter, buff brick onto the courtyards and the first floor of the bit linking the new build to the rear of 827 on Brunswick Square. 21. A mid-tone, bronze-coloured metal cladding is proposed for the several places with a set-back top floor; to the link element at the rear of 827 and to the taller elements along the western end of Brunswick Square, around the corner, down the whole of the western side and to the corner of Percival Court. This will act as a roof-like element and give an apparent lightness and apparent lower height to these, as well as giving a more pleasing proportioning, of “Base”, “Middle” and “Top” to these somewhat taller elements, consistent with the “mansion block” typology. 22. The “Base” is the other part of that elevational grading and is here expressed sometimes in recesses and in use of a dark grey brick, occasionally both; the recesses elegantly house and reduce the prominence of potentially ugly and frontage deadening necessary ground floor bin store, bike store and plant room doors, as well as coordinating with shopfronts. This leaves a “Middle” that varies from one to three, four and five storeys each of regularly spaced and sized window openings, often set within a recess of the same metal cladding as the Top, giving them a consistent, elegant, vertical proportion. 23. The Middle sections of the proposed elevations are further embellished with a series of stacks of recessed balconies; at each outside corner of the outer red brick perimeter and in four regularly spaced stacks along the longer western façade, dividing that latter façade into an orderly, rhythmic, façade that also mark the recessed front doors to the ground floor maisonettes to this façade. The northern, Brunswick Square façade also contains one further, striking element; a two storey high arched opening. This provides both access to further servicing (gated) and a view into the courtyard garden; and out from that garden to the street, also potentially a surprising and pleasing shaft of light into the narrow street. 24. Overall, one can consider that whilst the form and composition of the proposal is complex and filled with subtle touches of cleverness, this is necessary and appropriate to respond successfully to the complex context, of dramatically different and challenging existing neighbours to all four sides, including the rear of the high quality, heritage significant buildings on the High Road and narrow alleyways to the north and south, as well as the likelihood of some of the surrounding context changing dramatically in the relatively short term. They are better not considered by their elevations so much as by their likely glimpsed views and key	
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corners, as demonstrated in the elegantly urban views of the proposals in the applicants Design and Access Statement.

Residential Quality (room & private amenity space shape, size, quality and aspect)

25. The proposals are for Student Housing, to which the Nationally Described Space Standards on minimum room and flat sizes do not apply. However the applicants have provided evidence that the bedroom sizes proposed are more generous than average for student housing currently being built, which itself would be considerably better than that historically provided, and is considered by educational institutions to meet or exceed their recommendations. Some of the student accommodation is in the form of larger, standalone bed-sitting rooms (studios), but the majority are clusters of seven to twelve stud-bedrooms with a shared sitting-dining kitchen. Studios and clusters are accessed off three stair and lift cores located in the north-west, south-west and north-east corner of the second courtyard, along with three ground and 1st floor “maisonette clusters” accessed directly off the west side of the courtyard, as well as with their own door off the western side Peacock Mews / future north-south street.
26. As is expected in student housing, individual rooms / units do not have private external amenity space. However, the development includes two external communal courtyards, a roof terrace at the fourth floor, that should receive generous sunshine. There will also be internal shared amenities, including communal lounges, communal laundry, gymnasium all at ground floor around the first courtyard. Almost all studios and study-bedrooms are inevitably single aspect, however many of the clusters are dual aspect, with most of the shared sitting-dining-kitchens located on corners with dual aspect. As the layout currently follows the street pattern, some units will therefore be single aspect north facing. But the overall quality of private and communal accommodation is exemplary for student housing.
27. There are also six independent flats proposed for the converted and extended retained existing buildings on the High Road frontage, converted from the existing 1st and 2nd floors and from the added mansard roof proposed for nos. 819 & 821. These are intended to be subsidiary to the student housing, such as for visiting academics, but would have their own front doors off the High Road; in 819 & 821 both accessing a 1st floor studio flat with separate kitchen and roof terrace & 2nd-3rd floor two bed maisonette; in 825 accessing a three bedroom flat above 823 & a two bedroom flat above 825, each with their own west-facing balconies. All these flats would be dual aspect, and their room and overall sizes comply with or exceed minima defined in the Nationally Described Space Standards, as is to be routinely expected.

Daylight, Sunlight and Privacy

28. The applicants provided Daylight and Sunlight Reports on levels within their development and the effect of their proposals on relevant neighbouring buildings, prepared 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" (3rd Edition, Littlefair, 2022), known as "The BRE Guide". 29. The applicants' assessments were carried out against both the existing and planned positions, including nearby approved proposals and proposals currently in for planning, including the "Goods Yard and Depot Site" and High Road West. This is likely to have made good day and sunlight harder to achieve than the existing condition, but it could be that subsequent developments elsewhere will be detrimental to day and sunlight in this development. There could be an argument that as the first to come forward, this development would have the right to "take the light", but the applicants' consultants acknowledge in their report that the Enterprise House appeal decision (Appeal Ref: APP/E5900/W/17/3191757) requires developers to consider reasonable development expectations on neighbouring sites by at least assessing their proposals against a "mirror development" of their proposals on neighbouring likely development sites. This has been done for assessing the impact of this proposal on neighbouring existing buildings, but not for assessing the impact of likely future neighbouring developments in this development, or of the likely impact of this proposal on likely neighbouring developments. 30. Their assessment finds the proposed development achieves good levels of daylight and sunlight in most of the PBSA and flats over the High Road frontage, with of the 328 rooms assessed, 246 (75%) would meet the target daylight illuminances adopted in their assessment (100 lux for bedrooms, 150 lux for shared LKDs, studios, bed-living rooms and indoor amenity spaces, and 200 lux for a KD and a kitchen). This comprises 237 rooms (77%) in the PBSA building and 9 (47%) in the High Road buildings. In the bedrooms, the desk would typically be positioned close to the window where the median illuminance would generally be at least 200 lux. The applicants' consultants note reasonably that requirement for the design to balance daylight with passive solar gain and overheating considerations precludes the provision of more or larger windows or the use of glazing with higher visible light transmittance, and to provide further context, daylight provision was also assessed using the ADF methodology under the superseded 2011 edition of the BRE guide, finding much higher daylight results, partly because more conservative internal surface reflectance must now be used in calculations. 31. For sunlight to their proposals, their assessment finds that 64 out of 88 (73%) of cluster flats and studios would satisfy the guideline for normal residential development of at least 1.5 hours of sunlight on 21 March, and five out of seven of the indoor communal amenity spaces would exceed or be close to that target. Of the three outdoor amenity spaces, one would satisfy the guideline of at least 2 hours of sunlight over 50% (the 4th floor roof terrace - in fact over all of its area), although the courtyards, perhaps not surprisingly, would not receive much sunlight in March (although they would in June), meaning the students would have access to well sunlit	
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	external space on this roof terrace, if not so often in the more overlooked courtyards used more for fresh air and circulation. 32. The assessment of the impact of these proposals on existing neighbouring developments shows that there would be only very minor noticeable loss of daylight and noticeable loss of sunlight, namely: 831-833 High Road, 813-817 High Road and 811a High Road. In the case of 831-833, which is on the north side of Brunswick Square, the loss would be the same for a mirror image of their building on the applicants' site, so the loss is not unreasonable and currently benefits from unexpectedly good daylight due to there being only single and two storey buildings opposite them on the application site. To 813-187 one living room would lose a barely noticeable amount of daylight, taking it down to nearly 26% Vertical Sky Line (just below the 27% recommendation); only bedrooms would lose more and then not catastrophically so. The rooms affected in 811a are in an unbuilt proposed development, and would retain a good VSC of the low 20s%. 33. 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. In this case, the levels of day and sunlight achieved are reasonable, if not great (when concerns at the full effects of likely neighbouring developments are born in mind), but this should be balanced against being part of a vibrant high density development right on a busy high street, and as part of a masterplan that will deliver significant public realm, public amenity and regeneration benefits. 34. Privacy between habitable rooms within the development is tight, as is inevitable in a fairly high density, low rise development, and is most probably similar to those existing dwellings in close proximity to the High Road, but there are relatively few existing residential dwellings in close proximity. There are existing 1st and 2nd floor flats over the High Road frontage in 813-817 immediately to the south of the application site, with windows facing west across the roof of their single storey rear extension, south-east of this proposed development, as well as 1st and 2nd floor flats over the High Road frontage of 831-833 High Road, on the north side of Brunswick Square, immediately north of the development. There is also a permitted development on the	
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	south side of Percival Court (807 High Road) containing residential 1st, 2nd and 3rd floor windows facing north. No existing external amenity spaces would be overlooked. 35. Both the cases on the opposite sides of the alleyways should have less expectation of privacy from windows facing the street, but across an alleyway with close proximity, greater effort should be made to avoid overlooking. Nevertheless the distance of the proposal from both 807 and 813-817 is approaching or over the 18m beyond which the human face cannot be recognised, normally considered the threshold over which distance confers privacy. The only privacy issue would seem to be for 831-833, and only from two study-bedrooms, in the “link” building between the main quadrangle and the rear of 827, which would have windows and its roof terrace close to the existing dwellings’ windows, but these are designed to direct the line of sight away from the existing neighbours. 36. A consideration of the effects of wind microclimate or other environmental effects would not be relevant to the design assessment on this low to medium rise development.	
LBH Lead Local Flood Authority/Drainage	Thank you for consulting us on the above planning application reference number HGY/2023/2306 for the full planning application for the demolition of existing buildings and structures to the rear of 819-829 High Road; the demolition of 829 High Road; and redevelopment for purpose-built student accommodation (Sui Generis) and supporting flexible commercial, business and service uses (Class E), hard and soft landscaping, parking, and associated works. To include the change of use of 819-827 High Road to student accommodation (Sui Generis) and commercial, business and service (Class E) uses at 819-829 High Road, Tottenham, London, N17 8ER After reviewing the applicant’s submitted Drainage Strategy document reference number HRW-BHE-PW-XX-RP-CI-03000 – 0049225 Revision PO3 dated 16th August 2023 as prepared by Buro Happold Consultant and other related documents and drawings accompanying the planning application, we have no comments, or major concerns relating to the above full planning application. We are therefore content with the submission, and if the proposed scheme is constructed and maintained as per the above attached Drainage Strategy report, we are satisfied that the impact of surface water drainage has been appropriately addressed.	Noted the proposed SuDS features are acceptable subject to management and maintenance being secured by condition.
LBH Pollution & Air Quality/Contaminated Land	<u>Re: Planning Application HGY/2023/2306 at 819-829 High Road, Tottenham, London, N17 8ER</u> Thank you for contacting the Carbon Management Team (Pollution) regarding the above planning application for the demolition of existing buildings and structures to the rear of 819-829 High Road; the demolition of 829 High Road; and redevelopment for purpose-built student accommodation (Sui	Noted conditions on Land Contamination, Unexpected Contamination, NRRM and

	Generis) and supporting flexible commercial, business and service uses (Class E), hard and soft landscaping, parking, and associated works. To include the change of use of 819-827 High Road to student accommodation (Sui Generis) and commercial, business and service (Class E) uses and I would like to comment as follows. Having considered all the relevant submitted information including; Design and Access Statement, prepared by F3 Architects dated August 2023; Sustainability and Energy Statement with reference HRW-BHE-PW-XX-RP-YS-0005, prepared by Buro Happold Ltd, dated 21st August 2023 taking note of the proposal to make use of the existing DEN as well as Air Source Heat Pumps and solar PV panels; Land Contamination Assessment (Phase 1) with reference HRW-BHE-PW-XX-RP-CG-0001, prepared by Buro Happold Ltd, dated 11th August 2023 taking note of sections 5 (Preliminary Geoenvironmental Risk Assessment) and 6 (Conclusions and Recommendations); Air Quality Assessment with reference J10/14484A/10/2/F2, prepared by Air Quality Consultants Ltd, dated 23rd August 2023 and Site Construction Management Plan prepared by Arcadis dated the 5th July 2023, please be advised 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. 1. <u>Land Contamination</u> Before development commences other than for investigative work: - Using the information already submitted in Land Contamination Assessment (Phase 1) with reference HRW-BHE-PW-XX-RP-CG-0001, prepared by Buro Happold Ltd, dated 11th August 2023, an intrusive site investigation shall be conducted for the site using information obtained from the desktop study and Conceptual Model. 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 the remediation requirements. - 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.	Demolition/Construction Environmental Management Plans which are all recommended.
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Reason: To ensure the development can be implemented and occupied with adequate regard for environmental and public safety.

2. Unexpected Contamination

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

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

3. NRMM

- a. No works shall commence on the site until all plant and machinery to be used at the demolition and construction phases have been submitted to, and approved in writing by, the Local Planning Authority. Evidence is required to meet Stage IIIB of EU Directive 97/68/ EC for both NOx and PM. No works shall be carried out on site until all Non-Road Mobile Machinery (NRMM) and plant to be used on the site of net power between 37kW and 560 kW has been registered at <http://nrmm.london/>. Proof of registration must be submitted to the Local Planning Authority prior to the commencement of any works on site.
- b. An inventory of all NRMM must be kept on site during the course of the demolitions, site preparation and construction phases. All machinery should be regularly serviced and service logs kept on site for inspection. Records should be kept on site which details proof of emission limits for all equipment. This documentation should be made available to local authority officers as required until development completion.

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

4. Demolition/Construction Environmental Management Plans

- a. Demolition works shall not commence within the development until a Demolition Environmental Management Plan (DEMP) has been submitted to and approved in writing by the local planning authority whilst
- b. Development shall not commence (other than demolition) until a Construction Environmental Management Plan (CEMP) has been submitted to and approved in writing by the local planning authority.

	The following applies to both Parts a and b above: a) The DEMP/CEMP shall include a Construction Logistics Plan (CLP) and Air Quality and Dust Management Plan (AQDMP). b) The DEMP/CEMP shall provide details of how demolition/construction works are to be undertaken respectively and shall include: i. A construction method statement which identifies the stages and details how works will be undertaken; ii. Details of working hours, which unless otherwise agreed with the Local Planning Authority shall be limited to 08.00 to 18.00 Monday to Friday and 08.00 to 13.00 on Saturdays; iii. Details of plant and machinery to be used during demolition/construction works; iv. Details of an Unexploded Ordnance Survey; v. Details of the waste management strategy; vi. Details of community engagement arrangements; vii. Details of any acoustic hoarding; viii. A temporary drainage strategy and performance specification to control surface water runoff and Pollution Prevention Plan (in accordance with Environment Agency guidance); ix. Details of external lighting; and, x. Details of any other standard environmental management and control measures to be implemented. c) The CLP will be in accordance with Transport for London's Construction Logistics Plan Guidance (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;	
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	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. <u>Reason:</u> To safeguard residential amenity, reduce congestion and mitigate obstruction to the flow of traffic, protect air quality and the amenity of the locality.” <u>Informative:</u> 1. Prior to demolition or any construction work of the existing buildings, an asbestos survey should be carried out to identify the location and type of asbestos containing materials. Any asbestos containing materials must be removed and disposed of in accordance with the correct procedure prior to any demolition or construction works carried out. Notwithstanding the above, should the submitted energy strategy be revised to include a combustion plant, the applicant will have to submit an updated Sustainability and Energy Statement and Air Quality Assessment in order to determine the likely operational effect of the development on local air quality. I hope the above clarifies our position on the submitted application? Otherwise, feel free to contact us should you have any further query in respect to the applications quoting M3 reference number WK/581444. Kind Regards, Edward Ritchie Pollution Officer Carbon Management, Placemaking and Housing, Haringey Council	
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LBH Transportation	Transportation Planning Comments HGY/2023/2306, 819-829 High Road, Tottenham, London, N17 8ER Date: 30/11/2023 Proposal: Full planning application for the demolition of existing buildings and structures to the rear of 819-829 High Road; the demolition of 829 High Road; and redevelopment for purpose-built student accommodation (Sui Generis) and supporting flexible commercial, business and service uses (Class E), hard and soft landscaping, parking, and associated works. To include the change of use of 819-827 High Road to student accommodation (Sui Generis) and commercial, business and service (Class E) uses. Description An application has been received seeking planning permission to demolish the existing building to the rear of 819-829 High Road and redevelop the site for purpose-built student accommodation (Sui Generis) and flexible use commercial, business, and service use (Class E). The site would make provision for 1 on-site disabled parking bay. However, no electric vehicles charging points would be provided for the space. The residential cycle parking provision would be 215 long-stay, 9 short-stay and commercial cycle parking 4 long-stay and 9 short-stay. The site is currently used as a private hire venue on the Peacock Industrial Estate and has approximately 50 car parking spaces on-site. It can be accessed from Brunswick Square. Brunswick Square is adopted highway and Percival Court is privately owned. The site is in close proximity to Tottenham Hotspur Stadium. The commercial units will have a gross external floor area of 238 sqm GEA. The site is located within the Tottenham North CPZ, which restricts parking to permit holders only Monday to Saturday between the hours of 0800 – 1830, with extended hours on events days and extra hours on Sundays and Public Holidays. There are pay by phone parking bays located on High Road with a max stay of 2 hours and different operating times on event days. The proposal site PTAL rating ranges from 4-5 indicating that its access to public transport is very good when compared to London as a whole suggesting that there are opportunities for trips to be made to and from the site by modes other than the private car. The proposal site has convenient access to local shops, services, facilities and transport links. White Hart Lane Overground station is easily accessible from the location site with it only being approximately: a 4min walk and 2min bike ride. The site is served by several bus routes on High Road and White Hart Lane. Unit mix Proposed: 287 x student rooms. Car parking Planning Policy requires that applications for planning permission be determined in accordance with the development plan unless material considerations indicate otherwise. The published London Plan 2021 Policy T6 Car parking 10.6.5 states that ‘<i>where no standard is given, the level of parking should be determined on a case-by-case basis taking into account of Policy T6 Car Parking, current and future PTAL and wider measures of public transport, walking and cycling connectivity</i>’. This policy	Following satisfactory responses to queries, no objection subject to recommended conditions and s106 obligations. Some requests have not been sought where these go beyond what was previously requested under the extant permission and there have been little or no material changes in that regard.
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	will be utilised because no guidelines are specifically given to student accommodation within the London Plan 2021. This policy states that car free development should be a starting point for all proposals in places that are or planned in locations which are well connected to public transport, with developments elsewhere designed to provide the minimum necessary parking ('car-lite'). This is further supported with Haringey Council's published Development Management DPD, Policy DM32 Parking states that the council will support proposal for new developments with limited or no on-site parking, where: • There are alternative and accessible means of transport available. • Public transport accessibility is at least 4 as defined in the Public Transport Accessibility Index. • A Controlled Parking Zone (CPZ) exists or will be provided prior to the occupation of the development. • Parking is provided for disabled people. • Parking is designated for occupiers of developments specified as car capped. Taking into account the above policies and the sites car free nature, apart from the single provision of disabled parking bay, the development is in accordance with policy. To further ensure that the development does not produce any local vehicle trips the applicant would be required to enter into a S106 agreement prohibiting students from acquiring a residents parking permit. With regards to disabled parking bays the Highway Authority appreciates the provision of on-site disabled parking for students of the development. Supplementary information has been provided by the applicant's transport consultants on the method used to work out the disabled parking provision for the site. The applicant should identify and allow for the possible increase in the provision of on-site disabled parking bays as when the demand for it arise, as the number of those occupying the site will be around 287. Consequently, there may be a higher possibility of residents requiring use of a parking space due to disability and number of those living on-site. This supported by the London Plan 2021 Transport 10.6.23 which states that '<i>The provision of disabled persons parking bays should be regularly monitored and reviewed to ensure the level is adequate and enforcement is effective</i>'. All designated disabled person's parking bays and enlarged bays should be designed in accordance with the design guidance provided in BS8300: Vol 1. Trip generation Trip generation has been submitted as part of the application and included within the Transport Assessment. TRICs survey sites have been used as the basis of the analysis, with all 6 sites being used within London and bedroom numbers ranging from 103 – 1,100. Most of these sites have been surveyed before Covid 19 and its subsequent lockdowns, which could allude to differences in travel patterns from surveys conducted during Covid 19. Therefore, these sites might not truly reflective of	
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	what current travel trips might be from student accommodation. Trips for all modes of transport have been provided on for the AM and PM peaks only, with these trips being quite low for the number of bedrooms that are being provided for this proposal. It is more highly likely that most trips will be spread throughout the day as student accommodation does not tend to have the same AM/PM travel as residential developments. Additionally, this development it more likely to provide more cycling trips as a result of the high provision of on-site cycle parking. Overall, the Highway Authority finds the trip generation to be acceptable. Car club The Highway Authority would require the developer to enter into a S106 agreement with Haringey Council for them to provide car club facilities in the local vicinity of the location site for the potential occupants of the development to make use of. This would assist with reducing the rate of car ownership from residents of this development and help to offset any potential parking impacts on local residential streets when the CPZ is not in operation. The Highway Authority would require the applicant to liaise with local car club operators who will advise on the local coverage and whether the applicant should be funding any new bays/cars in the locality to the site to meet future car club demand from the development. The applicant will be required to provide 3 years car club membership for each residential unit, along with £50 driving credit, which has been already stated within the submitted Transport Statement for this site. Cycle parking The proposal site cycle parking provision for the student accommodation will be based upon standards within the published London Plan 2021 Policy T5 Cycle which are 0.75 spaces per bedroom for long-stay and 1 space per 40 bedrooms for short-stay. Use Class B1 long-stay 1 space per 150 sqm (GEA) and Use Class A3 short-stay 1 space per 40 sqm (GEA) have been used to determine the commercial on-site cycle parking by the developer. No justification or evidence has been given on the different Use Classes that have been used to determine this site's commercial cycle provision or information which displays the workings out for the provision. Overall, the development would see the provision of 215 long-stay and 9 short-stay for the student accommodation and 4 long-stay and 9 short-stay for the commercial properties. The Highway Authority finds the student accommodation cycle provision to be satisfactory as it is in accordance with policy. Plans have been received detailing the location of the on-site cycle parking for long-stay would be spread over 5 internal locations, with bikes being able to be parked on two-tier racks. These locations can be accessed from inside the courtyard of the development and outside on Brunswick Square and High Road. Short-stay cycle parking will be provided in the form of Sheffield stands on Brunswick and Percival Square. No information apart from floor plans have been provided on the exact design of the secure long-stay cycle parking for both the student accommodation, commercial units and how parking will be secure for students. This issue can be addressed with a pre-commencement planning condition requiring the applicant to submit details of cycle parking spaces in line with the	
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	London Plan and the London Cycle Design Standards (LCDS) which must be submitted and approved before development commences on site. Electric vehicle charging It appears with the provision of the 1 disabled parking bay on-site that it would not be supported with any electric vehicle charging points. The published London Plan 2021 does not contain any specific guidance on the provision of electric charging points for student accommodation. Although, Haringey Council's Development Management DPD, Chapter 5 Transport & Parking 5.5 states that <i>'the Council also supports the provision of electric charging points in new developments with the aim of encouraging greater use of electric vehicles'</i>. Therefore, the Highway Authority would request that full provision of an active charging point is provided from onset for the disabled parking space to maximise the support of electric vehicle travel to the site. This issue can be addressed by way of a planning condition. Access The submissions Transport Assessment has included an Active Travel Zone (ATZ) assessment which has covered a 20-minute cycle distance from the site. It includes an assessment of the environment and main routes for both pedestrians and cyclists to the site, along with key destinations. These routes have been assessed using Healthy Streets and suggestions on how they can be improved for both. These routes are as follows: from the Site to Upper Edmonton High Street, from the Site to Northumberland Park Rail Station, from the Site to Bruce Castle Park, from the Site to St. Paul's Church on Park Lane, and from the Site to Lordship Lane. Collision data has been included within the ATZ by the developer for a three-year period to November 2020. However, the data has been presented in a table with the junction locations given, which can make the data hard to follow and understand. Consequently, the Highway Authority has examined collision data via Transport for London's Road Safety Data Reports that only included pedestrians and cyclists in the mode of transport. It can be seen in the vicinity to the junction with Northumberland Park and High Road that 4 slight and 1 serious collision took place that involved both cyclists and pedestrians, this has taken place near to Percival Court. 2 slight collisions involving a cyclist and pedestrian at the junction Brunswick and High Road. Additionally, 2 slight and 1 serious collisions happened on the junction with White Hart Lane and High Road. Therefore, the Highway Authority would require the developer to provide funding towards a highway improvement scheme which will address issues surrounding pedestrian and cyclist road safety within the vicinity of the site. Highways works As previously mentioned, Brunswick Square is an adopted road which the developer wishes to propose several changes to it as part of this application. The road will be widened as to provide a better and safer environment for vehicles servicing and delivering to the site and those occupants who cycle to/from it. The southern side of Brunswick Square is envisaged to have a footway and provide pedestrian route to the Printworks building. The road will have a max speed of 20 mph which is reflective of that on High Road. All works that take place on the adopted highway will be subjected	
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	to a S.278 agreement between the applicant and the Council. The applicant will be required to enter the S.278 agreement before any works commence on site. Clarification is required on the widening of Brunswick Square and adoption of the new strip of land byway of a S.38 agreement including the commuted sum for maintenance. Service and Delivery A draft Service and Delivery Plan has been received which sets out some detail for the site. All of the sites proposed servicing and deliveries would take place on two new loading bays which are located on the southern part of Brunswick Square. Refuse collection is anticipated to take place on the loading bays and be done by a private refuse collector, the bays are nearby to the sites refuse stores. Vehicle types that are expected to service the commercial units are expected to be a combination of heavy and light good vehicles, with a maximum length of 8m and weight of 7.5t. The student accommodation would have services/deliveries by Light Goods Vehicles (LGV) of 6m length and Medium Goods Vehicles (MGV) of 8m length. A turning head located northern part of the development, and which leads onto Brunswick Square would be provided for vehicle servicing/delivering to turn around and leave in a forward gear back onto High Road. Some swept path drawings have been provided as a part of the Transport Statement which displays the loading bays being fully occupied with a vehicle leaving whilst a vehicle is still parked up. However, it is difficult to distinguish between the different type of vehicles that are shown in the drawings. Nothing has been suggested on how the turning head will be managed to prevent vehicles from parking inside of it and blocking access for vehicles visiting the site to fully manoeuvre and leave in a forward gear. The Highway Authority will condition the submission of Service and Delivery Plan. Construction and logistics A draft Construction and Logistics Plan has been developed and submitted a part of this submission, which sets out the basic principles to the development construction. Provision should be made for on-site cycle parking for workers, as this will promote cycling to the site, and it is well supported by local cycle infrastructure. Given the sites connectivity to public transport and the locality of CPZs no on-site car parking should be provided for workers. Deliveries will be made between the hours of 08:00 – 15:00, although this would mean that deliveries are being made within the peak times. The following times: 08:00-09:00, 15:00-16:00, and 17:00-18:00 are recommended to be avoided by the delivery vehicles. This is to avoid peak time traffic and school drop-off/pick up times by both construction and delivery vehicles visiting the site. There is mention of Brunswick Square being used for access and egress of vehicles, though no details were given on whether the access would be widened before the stage which would require larger vehicles to visit the site as it is currently only has a width c.3.4m. Effort should be made to have a process in place to deal with deliveries that turn up late or announced as to deal to avoid any negative impact to the highway. Overall, the Highway Authority welcomes the inclusion of a draft Construction and Logistics Plan, though a more detailed documented is needed.	
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	The Highway Authority would require that a Construction Logistics Plan (CLP) be submitted by the developer/applicant, this can be secured via a S.106 obligation. The developer/applicant will need to adhere to Transport for London's guidance when compiling the documents, construction activity should also be planned to avoid the critical school drop off and collection periods, the applicant will be required to pay a construction travel plan contribution of fifteen thousand pounds (£15,000) for the monitoring of the construction activities on site. Recommendation There are no highway objection to this proposal subject to the following conditions and s.106 obligations. Conditions <u>1. Delivery and Servicing Plan and Waste Management</u> The owner shall be required to submit a Delivery and Servicing Plan (DSP) for the local authority's approval. The DSP must be in place prior to occupation of the development. The service and deliver plan must also include a waste management plan which includes details of how refuse is to be collected from the site, the plan should be prepared in line with the requirements of the Council's waste management service which must ensure that all bins are within 10 metres carrying distances of a refuse truck on a waste collection day. Reason: To ensure that the development does not prejudice the free flow of traffic or public safety along the neighbouring highway. <u>2. Cycle Parking</u> The applicant will be required to submit to the Highway Authority plans showing accessible; sheltered, and secure student accommodation cycle parking for 215 long-stay cycle spaces, with 9 long-stay, and commercial cycle parking for 4 long-stay and 9 short-stay. The applicant will be required to submit plans to the Highway Authority in detail showing the design and type of on-site cycle parking for both short and long stay, the details should be submitted before development commences on site. Reason: To ensure that cycle parking is provided in line with the published London Plan 2021 Policy T5 Cycle and Transport for London's published London Cycle Design Standard (LCDS). <u>4. Electric Vehicle Charging</u> Subject to a condition requiring the provision of 1no. active electric vehicle charging points to serve the on-site parking disabled persons parking bay spaces from onset. Reason: to be in accordance with published Haringey Council Development Management DPD, Chapter 5 Transport & Parking. <u>5. Disabled Parking Bays</u>	
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	The applicant will be required to submit and provide plans showing 1 no. on-site disabled persons parking bays. REASON: to ensure the development is in accordance with the published London Plan 2021. S.106 Obligations <u>1. Construction Logistics and Management Plan</u> The applicant/developer is required to submit a Construction Logistics and Management Plan, 6 months (six months) prior to the commencement of development, and approved in writing by the local planning authority. The applicant will be required to contribute, by way of a Section 106 agreement, a sum of £15,000 (fifteen thousand pounds) to cover officer time required to administer and oversee the temporary arrangements, and ensure highways impacts are managed to minimise nuisance for other highways users, local residents and businesses. The plan shall include the following matters, but not limited to, and the development shall be undertaken in accordance with the details as approved: a) Routing of excavation and construction vehicles, including a response to existing or known projected major building works at other sites in the vicinity and local works on the highway. b) The estimated number and type of vehicles per day/week. c) Estimates for the number and type of parking suspensions that will be required. d) Details of measures to protect pedestrians and other highway users from construction activities on the highway. e) The undertaking of a highway dilapidation survey. f) The implementation of the Construction Logistics and Community Safety (CLOCS) standard. Reason: to ensure that the impacts of the development proposal on the local highways network are minimised during construction, and to coordinate construction activities in key regeneration areas which will have increased construction activities. <u>2. Car-Free Agreement</u> 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. <u>3. Car Club Membership</u> The applicant will be required to enter into a Section 106 Agreement to establish a car club scheme, which includes the provision of three years’ free membership for all residents and £50 (fifty pounds in credit) per year/per unit for the first 3 years. Reason: To enable residential occupiers to consider sustainable transport options, as part of the measures to limit any net increase in travel movements.	
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	<u>4. Student Accommodation Travel Plan</u> Within six (6) months of first occupation of the proposed new student accommodation development a Travel Plan for the approved residential uses shall have been submitted to and approved by the Local Planning Authority detailing means of conveying information for new occupiers and techniques for advising residents of sustainable travel options. The Travel Plan shall then be implemented in accordance with a timetable of implementation, monitoring and review to be agreed in writing by the Local Planning Authority, we will require the following measures to be included as part of the travel plan in order to maximise the use of public transport: a) The developer must appoint a travel plan co-ordinator, working in collaboration with the Estate Management Team, to monitor the travel plan initiatives annually for a minimum period of 5 years. b) Provision of welcome induction packs containing public transport and cycling/walking information to every new resident, along with a £200 voucher for active travel related equipment purchases. c) The applicants are required to pay a sum of, £2,000 (two thousand pounds) for five years £10,000 (ten thousand pounds) in total for the monitoring of the travel plan initiatives. Reason: To enable residential occupiers to consider sustainable transport options, as part of the measures to limit any net increase in travel movements. <u>5. Commercial Travel Plan</u> The Applicant will be required to enter a Section 106 agreement to secure a commercial Travel Plan. As part of the travel plan, the following measures must be included in order to maximise the use of public transport: a) The applicant submits a commercial Travel Plan for the commercial aspect of the Development and appoints a travel plan coordinator who must work in collaboration with the Facility Management Team to monitor the travel plan initiatives annually for a period of 5 years and must include the following measures: a) Provision of welcome workplace induction packs containing public transport and cycling/walking information, available bus/rail/tube services, map and timetables to all new residents, travel pack to be approved by the Councils transportation planning team. c) The applicant will be required to provide, showers lockers and changing room facility for the workplace element of the development. d) The developer is required to pay a sum of £2,000 (two thousand pounds) per year per travel plan for monitoring of the travel plan for a period of 5 years. This must be secured by S.106 agreement. Reason: To promote travel by sustainable modes of transport in line with the London Plan and the Council's Local Plan SP7 and the Development Management DMPD Policy DM 32. <u>6. Highways works</u>	
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	The applicant will be required to provide a detailed design for Brunswick Square, including CCTV, lighting improvements, details will also be required in relation to the proposed widening, including adoption and long-term maintenance, the drawing should include, existing conditions surveys construction details, signing and lining, the scheme should be design in line with the 'Healthy Streets' indicators perspective. The owner will be required to enter into agreement with the Highway Authority under Section 38, 278 of the Highways Act to pay for any necessary highway works, which includes if required, but not limited to, footway improvement works, access to the Highway, measures for street furniture relocation, carriageway markings, and access and visibility safety requirements. Unavoidable works required to be undertaken by Statutory Services will not be included in the Highway Works Estimate or Payment. In addition, the cost estimate will be based on current highways rates for the permanent highways scheme. The developer will be required to provide details of any temporary highways scheme required to enable the occupation of each phase of the development, which will have to be costed and implemented independently of the cost estimate for the permanent works. The applicant will be required to enter into the required agreements before development commences on site. Reason: To implement the proposed highways works to facilitate future access to the development <u>7. Highways Local Safety/ Vision Zero contribution</u> In line with the comments and the review of the ATZ submitted as part of the development proposal, we will require the applicant to pay a contribution of one hundred thousand pounds (£100,000) toward the Council accident reduction strategy to reduce pedestrian and cycle collision on the corridor between the Junction of Park Lan j/w the High Road and High Road j/w Brantwood Road. Reason: to mitigate the against the additional pedestrian and cycling trips that will be generated by the site and the potential increase in pedestrian and cycling collision, in line with the Mayors Vision Zero strategy and the Borough's collision reduction strategy.	
Tree Officer	From an arboricultural point of view, I hold no objections to the submitted landscape plans showing the courtyard and entrance planting. The tree species choice has good urban fitness and interest. An aftercare plan to establish the trees and plantings should be secured by condition. Aftercare management shall last five years until establishment with replacements required for any losses during that space of time.	Noted – Condition recommended.
LBH Waste Management	<u>Comments dated 17/10/2023.</u> I've looked at the additional information provided by the applicant, and these have addressed the concerns I raised. On this basis I don't have any other comments. <u>Applicant comments dated 17/10/2023.</u>	Noted – Acceptable proposals in terms of waste.

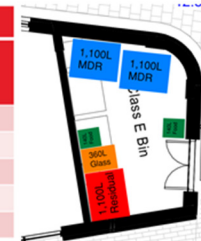
In response to the comments made by the NIwa & Waste Strategy Manager on 3rd October, Arup and F3 have reviewed the commercial waste stores and can confirm that the stores would not need to be resized to accommodate four days waste. Their response is copied below.

Commercial waste

- According to the DAS pg. 154 commercial waste calculations are based on 2 days storage and refuse and recycling are to be collected daily. We accept that commercial waste collection companies can provide up to twice daily collections, 7 days per week, however we would advise against sizing of the bins store and number of bins based on minimum size/number and maximum collections. The store should be sufficient space to store waste for at least 4 days. Four days waste can be accommodated. No additional bins would be required for the southwest bin store. One additional 1,100 litre Eurobin and one additional 140 litre wheelie bin would be required (for MDR and food waste respectively). The updated requirements are shown below in the right-hand tables and the image below shows that the additional bins for the northeast store can be accommodated without increasing the size of the store

Northeast bin store commercial two-day waste storage					Northeast bin store commercial four-day waste storage				
Waste Stream	Uncompacted Waste (m³)	Waste container		Space required (m²)	Waste Stream	Uncompacted Waste (m³)	Waste container		Space required (m²)
		Description	Number Required				Description	Number Required	
Residual	0.44	1,100 litre bin	1	3.55	Residual	0.88	1,100 litre bin	1	3.55
MDR	0.78	1,100 litre bin	1	3.55	MDR	1.56	1,100 litre bin	2	7.10
Glass	0.03	360 litre bin	1	1.50	Glass	0.05	360 litre bin	1	1.50
Food Waste	0.11	140 litre bin	1	1.00	Food Waste	0.23	140 litre bin	2	2.00
Total	1.36	-	4	9.60	Total	2.73	-	6	14.15

Southwest bin store commercial two-day waste storage					Southwest bin store commercial four-day waste storage				
Waste Stream	Uncompacted Waste (m³)	Waste container		Space required (m²)	Waste Stream	Uncompacted Waste (m³)	Waste container		Space required (m²)
		Description	Number Required				Description	Number Required	
Residual	0.17	1,100 litre bin	1	3.55	Residual	0.35	1,100 litre bin	1	3.55
MDR	0.10	1,100 litre bin	1	3.55	MDR	0.19	1,100 litre bin	1	3.55
Glass	0.02	360 litre bin	1	1.50	Glass	0.03	360 litre bin	1	1.50
Food Waste	0.07	140 litre bin	1	1.00	Food Waste	0.14	140 litre bin	1	1.00
Total	0.35	-	4	9.60	Total	0.71	-	4	9.60



- In the WMP there is reference to specialist waste streams such as WEEE, batteries and lightbulbs which will require the site to be licenced or have exemptions for such waste so evidence of this should be available if requested once the development is inhabited. The developer has confirmed that any waste from maintaining lawns, trees, hedges and flower beds will be disposed of by the appointed contractor. Noted

Purpose built student accommodation (PBSA)

- *As outlined in the Waste management plan it is proposed that student accommodation waste is collected weekly and storage space has been provided in accordance with the generation rates provided by LBH waste officers with one bedroom counted as one dwelling (see attached email for agreed calculations). Space has also been provided for food waste storage and for bulky waste. Student waste stores are provided for each core unit for students to deposit their waste. The waste from the PBSA blocks A,B &C will be consolidated to a single area accessible from Brunswick Place for collection. These measures are acceptable and meet or requirements. Noted*

Comments dated 03/10/2023.

I've had a look at the DAS and waste management plan (WMP) for this development and have the following comments.

Commercial waste

- According to the DAS pg. 154 commercial waste calculations are based on 2 days storage and refuse and recycling are to be collected daily. We accept that commercial waste collection companies can provide up to twice daily collections, 7 days per week, however we would advise against sizing of the bins store and number of bins based on minimum size/number and maximum collections. The store should be sufficient space to store waste for at least 4 days.
- In the WMP there is reference to specialist waste streams such as WEEE, batteries and lightbulbs which will require the site to be licenced or have exemptions for such waste so evidence of this should be available if requested once the development is inhabited. The developer has confirmed that any waste from maintaining lawns, trees, hedges and flower beds will be disposed of by the appointed contractor.

Purpose built student accommodation (PBSA)

- As outlined in the Waste management plan it is proposed that student accommodation waste is collected weekly and storage space has been provided in accordance with the generation rates provided by LBH waste officers with one bedroom counted as one dwelling (see attached email for agreed calculations). Space has also been provided for food waste storage and for bulky waste. Student waste stores are provided for each core unit for students to deposit their waste. The waste from the PBSA blocks A,B &C will be consolidated to a single area accessible from Brunswick Place for collection. These measures are acceptable and meet our requirements.

EXTERNAL		
Active Travel England	In relation to the above planning consultation and given the role of Transport for London (TfL) in promoting and supporting active travel through the planning process, Active Travel England (ATE) will not be providing detailed comments on development proposals in Greater London at the current time. However, ATE and TfL have jointly produced a standing advice note, which recommends that TfL is consulted on this application where this has not already occurred via a Stage 1 referral to the Mayor of London. Our standing advice can be found here: https://www.gov.uk/government/publications/active-travel-england-sustainable-development-advice-notes	Noted.
National Gas Transmission assets	Regarding planning application HGY/2023/2306, there are no National Gas Transmission assets affected in this area.	Noted.
Georgian Group	No comments to make.	Noted.
Greater London Archaeology Advisory Service (GLAAS)	819-829 High Road, Tottenham, London, N17 8ER Full planning application for the demolition of existing buildings and structures to the rear of 819-829 High Road; the demolition of 829 High Road; and redevelopment for purpose-built student accommodation (Sui Generis) and supporting flexible commercial, business and service uses (Class E), hard and soft landscaping, parking, and associated works. To include the change of use of 819-827 High Road to student accommodation (Sui Generis) and commercial, business and service (Class E) uses <u>Recommend Two (2) Archaeological Conditions</u> Thank you for your consultation received on 2023-09-18. The Greater London Archaeological Advisory Service (GLAAS) gives advice on archaeology and planning. Our advice follows the National Planning Policy Framework (NPPF) and the GLAAS Charter. <u>Assessment of Significance and Impact</u> The planning application lies in the Ermine Street Archaeological Priority Area identified in the borough's Local Plan [77008].	Conditions and informatives attached as recommended.

	The application site lies on the projected line of the Roman road of Ermine Street and remains of the road and contemporary roadside activity where it crosses the Moselle can therefore be expected. This potential is illustrated by the Roman finds at Snell Park made to the north of the application site in 1956 near where the road crosses Pymme's Brook. Later remains of roadside settlement on the site or in the close vicinity are present in historical records from the fourteenth century and mapped from the seventeenth century. Topographically and geologically, the site occupies the River Lea's low terrace. The Leyton gravels here (often mapped as Kempton Park) are often capped by brickearth and as a result have potential for early and later prehistoric remains. The Corcoran Lea Valley monograph puts prehistoric archaeological potential in this zone as moderate - disagreeing with the applicants' consultants who describe it as low - and it also puts Roman potential as being much higher than the applicants' archaeological assessment does. I am disappointed that they have not addressed this since their earlier assessment. Roman burials can be reasonably expected given the established pattern of funerary activity close to the headwaters of the Lea's tributary valleys, in this case the Moselle to the south and Pymme's Brook to the north, and the already mentioned presence of the Roman road. Alongside prehistoric and Roman potential at the site suggested by its geography, hydrology and geology, there are also possible mediaeval and post-mediaeval remains, illustrated by the listed buildings on site and nearby and the nineteenth century occupation of the site by the Brunswick Brewery. As with the last application, there continue to be missed opportunities for such an extensive development to reflect and celebrate local heritage and address policy aims in that area. Demolition of the locally listed 829 High Road and the rear of 827 High Road would merit historic buildings recording, pre-loss. <u>Planning Policies</u> NPPF Section 16 and the London Plan (2021 Policy HC1) recognise the positive contribution of heritage assets of all kinds and make the conservation of archaeological interest a material planning consideration. NPPF paragraph 194 says applicants should provide an archaeological assessment if their development could affect a heritage asset of archaeological interest. NPPF paragraphs 190 and 197 and London Plan Policy HC1 emphasise the positive contributions heritage assets can make to sustainable communities and places. Where appropriate, applicants should therefore also expect to identify enhancement opportunities.	
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If you grant planning consent, paragraph 205 of the NPPF says that applicants should record the significance of any heritage assets that the development harms. Applicants should also improve knowledge of assets and make this public.

Recommendations

I advise that the development could cause harm to archaeological remains and field evaluation is needed to determine appropriate mitigation. However, although the NPPF envisages evaluation being undertaken prior to determination, in this case consideration of the nature of the development, the archaeological interest and/or practical constraints are such that I consider a two-stage archaeological condition could provide an acceptable safeguard. This would comprise historic buildings recording, archaeological evaluation to clarify the nature and extent of surviving remains, followed, if necessary, by a full investigation.

I therefore recommend attaching two (2) planning conditions as follows:

CONDITION 1:

No demolition or development shall take place until a stage 1 written scheme of investigation (WSI) has been submitted to and approved by the local planning authority in writing. For land that is included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI, and the programme and methodology of site evaluation and the nomination of a competent person(s) or organisation to undertake the agreed works.

If heritage assets of archaeological interest are identified by stage 1 then for those parts of the site which have archaeological interest a stage 2 WSI shall be submitted to and approved by the local planning authority in writing. For land that is included within the stage 2 WSI, no demolition/development shall take place other than in accordance with the agreed stage 2 WSI which shall include:

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

Informative Written schemes of investigation will need to be prepared and implemented by a suitably professionally accredited archaeological practice in accordance with Historic England's Guidelines for Archaeological Projects in Greater London. This condition is exempt from deemed discharge

under schedule 6 of The Town and Country Planning (Development Management Procedure) (England) Order 2015.

CONDITION 2:

No demolition shall take place until a written scheme of historic building investigation (WSI) has been submitted to and approved by the local planning authority in writing. For buildings that are included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI, which shall include the statement of significance and research objectives, and

A. The programme and methodology of historic building investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works

B. The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material. this part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the WSI

Informative: The written scheme of investigation will need to be prepared and implemented by a suitably professionally accredited heritage practice in accordance with

Reason: Built heritage assets on this site will be affected by the development. The planning authority wishes to secure building recording in line with NPPF, and publication of results, in accordance with Section 12 of the NPPF

These pre-commencement conditions are necessary to safeguard the archaeological interest on this site. Approval of the WSI before works begin on site provides clarity on what investigations are required, and their timing in relation to the development programme. If the applicant does not agree to these pre-commencement conditions, please let us know their reasons and any alternatives suggested. Without these pre-commencement conditions being imposed the application should be refused as it would not comply with NPPF paragraph 205.

I envisage that the archaeological fieldwork would comprise the following:

Evaluation

An archaeological field evaluation involves exploratory fieldwork to determine if significant remains are present on a site and if so to define their character, extent, quality and preservation. Field evaluation may involve one or more techniques depending on the nature of the site and its archaeological potential. It will normally include excavation of trial trenches. A field evaluation report will usually be used to inform a planning decision (pre-determination evaluation) but can also be required by condition to refine a mitigation strategy after permission has been granted.

	And: Historic Building Recording Historic building recording is an investigation to establish the character, history, dating, form and development of a historic building or structure which normally takes place as a condition of planning permission before any alteration or demolition takes place. The outcome will be an archive and a report which may be published. To RCHME Level 3 with a public outreach element included. You can find more information on archaeology and planning in Greater London on our website. This response relates solely to archaeological considerations. If necessary, Historic England's Development Advice Team should be consulted separately regarding statutory matters. Yours sincerely Adam Single Archaeology Adviser Greater London Archaeological Advisory Service London and South East Region	
Health and Safety Executive	1. <u>Substantive response for the local planning authority</u> Headline response from HSE 'content' Scope of consultation 1.1. The above consultation relates to the erection of a new residential student development comprising of 1,514 beds in four 8 storey residential blocks: - Block A - comprises residential accommodation (residential flats, maisonettes, studios, residential bedsits, cluster flats), common amenity spaces and ancillary accommodation. With a block height of circa 12.5m. - Block B - comprises residential accommodation (residential flats, maisonettes, studios, residential bedsits, cluster flats), commercial units, common amenity spaces and ancillary accommodation. With a block height of circa 18.5m.	Response noted.

	- Block C - comprises residential accommodation (residential flats, maisonettes, studios, residential bedsits, cluster flats), commercial units, common amenity spaces and ancillary accommodation. With a block height of circa 15.5m. 1.2. It is understood all three blocks are served by single staircases. Block B has a firefighting shaft, all staircases served by a dry rising main. Block B is a relevant building. The remaining blocks are buildings within the curtilage of a relevant building. 1.3. It is noted that the adopted fire safety design standard is British Standard 9991 ('BS9991') for residential areas, British Standard 9999 ('BS9999') for commercial areas and ADB Volume 1 used for requirements of sprinklers and external walls. HSE has assessed the application accordingly. 1.4. Following a review of the information provided in the planning application, HSE is content with the fire safety design as set out in the project description, to the extent it affects land use planning considerations. HSE has identified a number of items as supplementary information, set out below. The applicant is advised to consider these matters in advance of later regulatory stages. 1. <u>Supplementary information</u> <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> Fire Statement 2.1. HSE acknowledges that the RIBA 3 Fire Strategy, provided with this application is comprehensive. This is welcomed and has supported the HSE's assessment process. Photovoltaic Panels 2.2. The roof plan drawings for each block show the proposed installation of photovoltaic panels (PV panels). Where the roof top installation of PV panels is proposed, it should be noted that fire safety standards require suitable support of cabling to avoid obstruction of escape routes and firefighting access due to the failure of fixings and consideration should be given to ensure that all power supplies, electrical wiring and control equipment is provided with appropriate levels of protection against fire. New studio apartments 2.3. Section 4.5.3 of the RIBA 3 Fire Strategy details the Studio accommodation provision. 2.4. Fire safety standards state that "the kitchen should be enclosed in open-plan flats having an area exceeding 8m x 4m. Cooking appliances in open-plan flats having an area smaller than 8m x 4m	
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	should not be adjacent to the entrance of the flat.” Cooking facilities should be located at the most remote part of the flat to protect the means of escape. Any design changes necessary will not affect land use planning in this instance and will be subject to later regulatory consideration. Cluster accommodation 2.5. Plan drawings show single means of escape from cluster accommodation in Blocks A, B and C is by way of a common corridor/lobby serving studio dwellings. 2.6. Fire safety standard 9991 states that: <i>“The cluster should be lobbied from any staircases serving the building (i.e. a protected lobby should be formed between the cluster front entrance door and the stair door)”</i>. Where travel distance is measured to a stair lobby door the lobby should not directly connect with any dwelling, storage space or any other space containing a potential fire hazard. 2.7. Any design changes necessary are unlikely to affect land use planning in this instance and will be subject to later regulatory consideration. 2.8. HSE welcomes that the cluster kitchens(s) in Blocks A, B and C of the building on most levels are located at the end of the corridor away from the final exit (cluster entrance door). However, it is noted that the position of the cluster kitchen on the top floor of Block B results in cluster bedrooms having to pass the kitchen door to exit the cluster. 2.9. The cited fire safety standard states kitchens should be located at the remote end of the corridor away from the final exit to the cluster and it will be for the applicant to demonstrate compliance at later regulatory stages. Additionally, any necessary internal alterations are unlikely to affect land use planning considerations. Means of escape 2.10. Section 3.3 of the RIBA 3 Fire Strategy states that mechanical smoke extract will be located in all stair core lobbies. The CFD for the mechanical system will be carried out at the detailed design stage; this CFD will also be used to assess and validate the tenability conditions within the common corridors for means of escape and firefighting. 2.11. It will be for the applicant to demonstrate that the means of escape is capable of being safely and effectively used at all material times, including during firefighting operations, and that the proposed fire engineered solution(s) provides an equivalent level of fire safety to that of code compliance.	
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	2.12. This matter will be considered at a later regulatory stage. If the CFD analysis does not support the design, then this may affect land use planning considerations. Habitat/green roof 2.13. A habitat or green roof may constitute a fire hazard as it requires a regular management and maintenance regime. Paragraph 12.3 of Approved Document B volume 1 ('ADBv1') states; <i>"separation distance is the minimum distance from the roof, or part of the roof, to the relevant boundary. Table 12.1 sets out separation distances by the type of roof covering and the size and use of the building. In addition, roof covering products (and/or materials) defined in Commission Decision 2000/553/ EC of 6 September 2000, implementing Council Directive 89/106/EEC, can be considered to fulfil all of the requirements for the performance characteristic 'external fire performance' without the need for testing, provided that any national provisions on the design and execution of works are fulfilled, and can be used without restriction".</i> 2.14. It will be for the applicant to demonstrate that the proposed habitat roofs are viable in relation to fire safety. This will be subject to further consideration at a later regulatory stage. 2.15. It will be for the applicant to demonstrate that the proposed green roofs are viable in relation to fire safety. This will be subject to further consideration at a later regulatory stage. 2.16. This document Fire Performance of Green Roofs and Walls (publishing.service.gov.uk) will provide guidance on the fire performance aspects of green roof and wall construction and maintenance. Fire service access and facilities 2.17. The applicant's proposal within the RIBA 3 Fire Strategy shows access and parking adjacent to the firefighting shaft in Block B and is proposed to incorporate the undercroft access to the western courtyard off Brunswick Street. 2.18. Although the proposed access appears to be acceptable, the landscaping layout seems to be restrictive, particularly regarding firefighting operations in a developing fire situation. The inclusion of a designated fire appliance parking space would help secure the straightforward commencement of firefighting operations. 2.19. Firefighting operational guidance published by the National Fire Chiefs' Council stipulates that firefighter 'entry control points' should be established in a safe position, in safe air, near the scene of operations. Furthermore, firefighters must consider the potential for escalation of the incident, and the best access to and egress from the scene of operations.	
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	2.20. Any design changes necessary are unlikely to affect land use planning in this instance Health and Safety Executive and will be subject to later regulatory consideration. However, care should be taken to ensure firefighting operations are not impeded by a cluttered environment in the courtyard when developing the landscape design. Some of the indicative designs shown in the application would not provide for reasonable firefighting access and facilities. Yours sincerely Gareth Underhill Fire Safety Information Assessor	
Historic England	Historic England have authorised the Local Planning Authority (LPA) to determine the application for listed building consent (HGY/2023/2307) as they see fit. They suggested that the LPA seek the views of their specialist conservation advisers.	Noted officers have sought the views of their specialist conservation advisers.
London Fire Brigade (LFB)	No comment on the proposals received.	Comments have been received from the HSE and LBH Building Control who find the proposals acceptable.
Metropolitan Police - Designing Out Crime Officer (DOCO)	<u>Re: Planning Application at:</u> 819-829 High Road, Tottenham, London, N17 8ER <u>Proposal:</u> Full planning application for the demolition of existing buildings and structures to the rear of 819-829 High Road; the demolition of 829 High Road; and redevelopment for purpose-built student accommodation (Sui Generis) and supporting flexible commercial, business and service uses (Class E), hard and soft landscaping, parking, and associated works. To include the change of use of 819-827 High Road to student accommodation (Sui Generis) and commercial, business and service (Class E) uses. Dear Haringey Planning, <u>Section 1 - Introduction:</u> Thank you for allowing us to comment on the above planning proposal.	Condition and informative recommended.

	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 2022 and August 2023 to discuss Crime Prevention and Secured by Design at pre-application stage and discussed our concerns around the design and layout of the development. This has been demonstrated within the Design and Access statement, but has omitted the recent change of design criteria to include student accommodation the main feature 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 stage. 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 criteria, in particular around the student accommodation, we have recommended the attaching of suitably worded conditions and an informative. The comments made can easily be mitigated early if the Architects that ensure that 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. <u>Section 2 - Secured by Design Conditions and Informative:</u> In light of the information provided, we request the following Conditions and Informative: <u>Conditions:</u> A. Prior to the commencement of above ground works of each building or part of a building, details shall be submitted to and approved, in writing, by the Local Planning Authority to demonstrate that such building or such part of a building can achieve 'Secured by Design' Accreditation. Accreditation must be achievable according to current and relevant Secured by Design guide lines at the time of above grade works of each building or phase of said development. The development shall only be carried out in accordance with the approved details.	
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	B. Prior to the first occupation of each building, or part of a building or its use, 'Secured by Design' certification shall be obtained for such building or part of such building or its use and thereafter all features are to be retained. Reason: In the interest of creating safer, sustainable communities. Informative: The applicant must seek the continual advice of the Metropolitan Police Service Designing Out Crime Officers (DOCOs) to achieve accreditation. The services of MPS DOCOs are available free of charge and can be contacted via docomailbox.ne@met.police.uk or 0208 217 3813. <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 any 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	
National Grid	There are no National Grid Electricity Transmission assets affected in this area.	Noted.
NHS London Healthy Urban Development Unit	HGY/2023/2306 - The Printworks Full planning application for the demolition of existing buildings and structures to the rear of 819-829 High Road; the demolition of 829 High Road; and redevelopment for purpose-built	Noted, however Haringey's Planning Obligations SPD and Annual Infrastructure

	student accommodation (Sui Generis) and supporting flexible commercial, business and service uses (Class E), hard and soft landscaping, parking, and associated works. To include the change of use of 819-827 High Road to student accommodation (Sui Generis) and commercial, business and service (Class E) uses. <u>HUDU Response to Haringey Planning Application</u> Haringey GPs, acute and mental healthcare services are under substantial pressure with limited space and recruiting additional clinicians, e.g., pharmacists and physiotherapists, to provide enhanced services to local people. This is a particular concern in the North Tottenham Area. To meet the health needs of the new residents of the proposed schemes, and to limit adverse impacts on existing residents, developments need to provide financial contributions via the relevant S106 agreement for the expansion of health infrastructure serving the locality. The site lies within the High Road West area allocated as site NT5 in the Tottenham Area Action Plan (2017). The High Road West Masterplan Framework (2014) acknowledges that additional healthcare provision is needed in the area, particularly primary care services. The site benefits from an extant planning application to provide 72 new homes, a cinema and supporting commercial units. The HUDU Planning Contributions Model calculated a primary healthcare requirement of £35, 845 for this development. This took into account that the two closest GP practices (Tottenham Health Centre and Somerset Gardens Family Health Centre have no surplus capacity as measured by the ratio of FTE GPs per registered patients which is above the standard benchmark). Acute and mental health services were excluded from this calculation. The ICB have been in discussions regarding the re-provision of Tottenham Health Centre and note that this forms part of the High Road West regeneration plans. In addition to this there is scope for extended or improved services at the Somerset Family Health Centre. It is also noted that the Lordship Lane Health Centre, which provides sexual health services, is less than a ten minute walk to the site which would provide services to the new population. The NHS Long Term Plan (2019) and the Fuller Stocktake Report (2022) re-emphasise the importance of providing care close to the community and to provide services on a neighbourhood basis where possible. This means in addition to increasing and improving primary capacity NHS Trusts are seeking to provide increased facilities and services locally where appropriate. The HUDU Planning Contributions Model, as set out in the 2021 London Plan, is required to be used to calculate the cost of mitigation for health. (please note that the HUDU Model does not currently incorporate the impact on Accident and Emergency and outpatient infrastructure nor the impact on the London Ambulance Service and therefore underestimates the cost of mitigation to the NHS).	Funding Statement make clear that health contributions should be dealt with through Strategic CIL rather than S106 planning obligations. Therefore the need for additional health care provision should be addressed by considering the use of Strategic CIL to support a new facility to cater for the needs arising from the wider High Road West site rather than through S106 planning obligations.
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	The current scheme consists of 287 student bedspaces consisting of 222 cluster bedrooms and 54 studios in a new build block and 9 cluster bedrooms and 2 studios in the existing buildings. The benefits of the scheme are recognised and supported including the delivery of student accommodation across London including affordable units and the enhancement of the green spaces. It is noted that the previous application was determined on the basis that Haringey’s Planning Obligations SPD and Annual Infrastructure Funding Statement suggests that health obligations are available through Strategic CIL rather than S106 payments and therefore no S106 contribution was secured. It is also noted that the latest CIL charging schedule has increased the amount of CIL from £15 per square metre to £85. Whilst health and wellbeing facilities are included on the Strategic Community Infrastructure Levy Infrastructure List, the list is indicative and there is no guarantee that CIL receipts will be allocated towards health infrastructure in north Tottenham to mitigate the direct impact of development. Therefore HUDU maintain that a s106 payment is required. The HUDU Planning Contributions Model has been used the calculate the contribution. The requirement would meet the tests in CIL Regulation 122 as it is considered necessary, reasonable and directly related to the development. It should be noted that the HUDU model has been updated since the previous comments on the scheme to take account changes in costs of construction and other assumptions. Also it is noted that the previous request the focus was on primary care only. Following the pandemic there has been significant pressure on hospital and acute services, including mental health, and therefore mitigation from development is considered to be necessary. We have run the HUDU model for this based on 287 additional residents which assumes that the students will not be local. The standard assumptions in regards to age have been HGY/2023/2306 – The Printworks 819-827 High Road modified to take into account the fact that the majority of students will be in a younger age bracket (15-44). The final summary information from the HUDU model is set out below. <table><tr><td colspan="2">Final Summary</td></tr><tr><td>Total Capital Cost</td><td>£303,060</td></tr><tr><td>Total Revenue Cost</td><td>£236,634</td></tr><tr><td>Combined Cost</td><td>£539,694</td></tr><tr><td>Total Number of Housing Units</td><td>287</td></tr><tr><td>Capital Cost Requirement Per Unit</td><td>£1.056</td></tr></table>	Final Summary		Total Capital Cost	£303,060	Total Revenue Cost	£236,634	Combined Cost	£539,694	Total Number of Housing Units	287	Capital Cost Requirement Per Unit	£1.056	
Final Summary														
Total Capital Cost	£303,060													
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	The HUDU Planning Contributions Model calculates a total healthcare (primary, acute and mental health) capital s106 requirement of £303,060 This shows an overall capital cost of £303,060 with a further revenue cost of £236,634. It is noted that the assumptions used in the model regarding the age profile and the use of local services by students who may continue to remain registered with doctors outside of Haringey, may lead to an inflated overall figure. Also, the age range of students will also likely result in more use of digital services. Funding for extra provision will be available as part of the High Road West development. Discussions with the NHS Trusts and the ICB indicate that expansion of existing sites should be possible and therefore we have reduced the capital cost of mitigation by 50% to £151,530. At this stage we are not asking developers to cover the additional revenue costs. However, they should be made aware that there are significant pressures and costs on the NHS of development. The request is the Council to secure £151,530 within the S106 agreement to be paid on commencement and indexed linked to building costs. It is however, noted that the viability assessment to support the latest charging schedule suggests that £20/sqm should be allotted to s106 contributions. The gross internal floor area gained (including change of use) is 8857sqm which when multiplied by 20 = £177,140.00. This would be the total amount that would be expected to be sought on top of CIL. As it is understood that there are further contributions to be sought for the development which would potentially raise the level of contributions above this amount. In light of this HUDU would welcome the opportunity to be kept informed of any negotiations regarding viability and would strongly suggest that, if the full required contribution cannot viably be sought through a s106 contribution primary care is prioritised and this is highlighted in any future meetings regarding CIL spending. <u>**Update Mon 27/11/2023</u> <i>I've checked the model and the breakdown is as follows the breakdown for mental Health - £66,814 and for acute - £151,295</i> <i>That makes a full contribution of £218,109 if we exclude healthcare and, following the same logic as before because there is capacity in existing sites £109,055 at 50%.</i> **	
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	Other points related to health are summarised below: Standard of Accommodation The Design and Access Statement submitted with the proposal states that the cluster bedrooms would be a minimum of 12.5sqm in size and each would contain an en-suite bathroom. This exceeds the standard for single occupancy and is welcomed. It is stated that up to 12 rooms may be included within a cluster sharing a kitchen. It is suggested that this ratio should be re-considered and a lower number of students per kitchen would offer a greater standard of accommodation. The standard and premium studios proposed do not meet the floorspace requirement of policy D6 of the London Plan. However, as student accommodation is occupied on a temporary basis, and it would be expected that the living accommodation is not utilised as much during daylight hours as residential flats for other purposes this could be acceptable. A condition would be recommended to ensure that each unit of accommodation is only occupied by one student. It is noted that the Daylight and Sunlight assessment does not comply with the minimum standards for all the rooms. This again could be relaxed due to the nature of student accommodation. Transport The accommodation is proposed to be car-free which is welcomed. There are accessible pedestrian accesses and bus stops on the High Road, White Hart Lane and Northumberland Park to serve the development. 237 cycle spaces are proposed, which although less than the number of students proposed to occupy the units is likely to be sufficient to encourage and promote cycling as a means of transport for the students. Further advice should be sought from the Local Authority Transport colleagues. Green Spaces A courtyard garden is proposed in the centre of the main body of amenity accommodation with a planting strategy to provide an attractive environment. Consideration should be given to securing a management plan for the landscaping area enforceable be condition. There is also a potential for food planting for the occupiers of the building which could be pursued. I trust that the above comments are useful in pursuing the application. However, please contact me if you require any clarification or if I can be of further assistance. We would request that we are consulted on any further amendments to the scheme which may effect primary and acute care	
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	provision and on any subsequent planning applications on the site and, as stated above, would welcome any involvement regarding the negotiation of the s106 contribution. Yours Sincerely F McElwain Faye McElwain MRTPI HUDU (Healthy Urban Development Unit) Planning Officer	
Thames Water	Waste Comments There are public sewers crossing or close to your development. If you're planning significant work near our sewers, it's important that you minimize the risk of damage. We'll need to check that your development doesn't limit repair or maintenance activities, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes 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	Noted - conditions are recommended.

	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 Thames Water would recommend that petrol / oil interceptors be fitted in all car parking/washing/repair facilities. Failure to enforce the effective use of petrol / oil interceptors could result in oil-polluted discharges entering local watercourses. Thames Water would advise that with regard to FOUL WATER sewerage network infrastructure capacity, we would not have any objection to the above planning application, based on the information provided. Water Comments Following initial investigations, Thames Water has identified an inability of the existing water network infrastructure to accommodate the needs of this development proposal. Thames Water have contacted the developer in an attempt to agree a position on water networks but have been unable to do so in the time available and as such Thames Water request that the following condition be added to any planning permission. No development shall be occupied until confirmation has been provided that either:- all water network upgrades required to accommodate the additional demand to serve the development have been completed; or - a development and infrastructure phasing plan has been agreed with Thames Water to allow development to be occupied. Where a development and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan. Reason - The development may lead to no / low water pressure and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development" The developer can request information to support the discharge of this condition by visiting the Thames Water website at thameswater.co.uk/preplanning. Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (e-mail: devcon.team@thameswater.co.uk) prior to the planning application approval. 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	
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	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. There are water mains crossing or close to your development. Thames Water do NOT permit the building over or construction within 3m of water mains. If you're planning significant works near our mains (within 3m) we'll need to check that your development doesn't reduce capacity, limit repair or maintenance activities during and after construction, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes 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. Please read our guide 'working near our assets' to ensure your workings are 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	
Transport for London	Re: HGY/2023/2306 - 819-829 High Road, Tottenham, London, N17 8ER <u>Full planning application for the demolition of existing buildings and structures to the rear of 819-829 High Road; the demolition of 829 High Road; and redevelopment for purpose-built student accommodation (Sui Generis) and supporting flexible commercial, business and service uses (Class E), hard and soft landscaping, parking, and associated works. To include the change of use of 819-827 High Road to student accommodation (Sui Generis) and commercial, business and service (Class E) uses.</u> Thank you for consulting TfL this proposal, TfL offers the following comments: 1. The site of the proposed development is on High Road, which forms part of the Strategic Road Network (SRN). TfL has a duty under the Traffic Management Act 2004 to ensure that any development does not have an adverse impact on the SRN. 2. The proposal includes 219 long stay and 18 short stay cycle parking spaces, totally 237 spaces, which is welcomed. TfL requires the details of such provision be conditioned for approval prior to commencement, ensuring that design of the facilities would be in line with the London Cycle Design Standard (LCDS) and London Plan cycle parking standards.	The applicant has identified that limited space is available for further disabled bays to be accommodated on-site or off-street along the roads surrounding the site. One disabled parking space is appropriate in the context of the provision of similar developments in London and the constrained environment on-site and on-street.

	Shower and Changing facilities should also be provided for the commercial, business and service land use accordingly. 3. It is welcomed that only disabled parking bay would be provided, and the proposal would be 'car free' without any general parking provision. The applicant shall also identify alternative locations and possible location for additional disabled facilities should such demand rise. 4. While trip generation and mode share assessments has been undertaken in the submitted TA, it appears that the applicant has not considered the likely destinations of the future residents of the student accommodations, which peak trips mainly would be for tertiary education institutions; therefore, the applicant shall review both assessments taking into account of the possible destinations of the residents, as this would impact mode share and trip rate for individual transport modes. A directional assessment shall also be provided for bus trips to be made. 5. The site sits within the HRWM, and any development impact to the London Overground (LO) should be considered cumulatively with any other sites seeking planning permission in the area. This should be considered assuming the proposed trip generation methodology - Cumulative rail impacts from the development in the wider area will be significant and the additional proposed sites are likely to put further strain on the station and services at White Hart Lane. 6. TfL requires that further work to be carried to understand the larger accumulative impact that this site will have on all the transport modes. As the development should be looked at and analysed in a wider site context, looking at the impact it has alongside the other developments and proposed developments within the High Road Western Masterplan. As the accumulative data needs to be analysed to check for potential pressure on surrounding transport services. 7. It is noted that an ATZ assessment has been carried out which is welcomed. Haringey Council is strongly encouraged to secure package of local walking, cycling and public realm improvements in light of findings. 8. Due to the site's proximity to the Tottenham Hotspur Stadium, the applicant needs to be aware of the impact that events at the stadium can have on construction arrangements and ease of access to the site. Construction arrangements should be aligned with major stadium events.	The development proposals should be understood in the context of the extant permission (Application Reference: HGY/2021/2283) The TA shows that the net impact of the changes brought forward by the current application would be a reduction in trips by all modes in the AM and PM peak hours. The proposals would therefore have no unacceptable impact on the transport network. The impact on London Overground, including the context of the wider cumulative development was considered in detail for The Goods Yard and The Depot (Application Reference: HGY/2021/1771). This assessment included The Printworks and concluded that no unacceptable impacts on London Overground arose. As the development proposals would result in a reduction in trips
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	9. Stage 1 Road Safety Audit and Healthy Street review should be undertaken for all proposed highway changes/ improvements. 10. In line with the London Plan policy T2 and T7F, a draft Delivery & Servicing Plan (DSP) has been submitted and is acceptable. It is nevertheless expected that the submission and approval of the final Delivery & Servicing Plan (DSP) should be secured by condition. 11. In line with Draft London Plan policy T7, a draft Construction Logistics Plan has been submitted which is in accordance with TfL's CLP guidance. This is welcomed. The submission and approval of the final Plan should nevertheless be conditioned. 12. A draft Framework Travel Plan has been submitted, which is supported. The final Travel Plan shall be secured by s106 agreement. It should promote and support active and sustainable travel and include specific measures to deliver this objective rather than the use of taxis, other private hire vehicles or private cars (save for disabled people) In conclusion, TfL requires that the applicant to address issues raised above satisfactorily, this ensures that the proposal would be London Plan compliant and would not result in an unacceptable impact to the SRN and local transport network (including public transport services. Please do not hesitate to contact me if I can be of any further assistance. Kind regards PakLim Wong Planning Officer City Planning, Transport for London	compared to the extant permission the findings of that assessment remain valid. As the development proposals do not result in significant changes to the streetscape compared to the extant permission a further healthy streets assessment is not required. A planning condition requiring a combined Stage 1 and 2 Road Safety Audit is recommended.
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