

Appendix 3: Consultation Responses from internal and external agencies

Stakeholder	Question/Comment	Response
INTERNAL		
LBH Carbon Management	Carbon Management Response 09/08/2024 In preparing this consultation response, we have reviewed: • Applicant's response dated 9 July 2024 • Relevant supporting documents. 1. Summary The applicant has provided justification for the proposed energy strategy, which is satisfactory and therefore, the energy strategy is supported. 2. Energy Strategy The applicant has provided justification for the higher Energy Use Intensity, which is associated with energy intense activities that are niche purpose to the type of the development i.e. an engineering building. Energy – Clean The applicant has submitted plan showing the proposed incoming DEN pipe route. Energy – Be Seen The applicant has shared the Be Seen submission confirmation. 3. Carbon Offset Contribution No changes in the overall carbon reduction, therefore, a carbon shortfall of 8.1 tCO₂/year still remains. The remaining carbon emissions will need to be offset at £95/tCO₂ over 30 years. 4. Overheating The applicant has confirmed that London Weather Centre files have been used in the modelling in line with the Energy Assessment Guidance 2022, testing DSY1, DSY2 and DSY3 2020s.	Recommended conditions and s106 heads of terms included. Minor amendments were agreed between the applicant and Carbon Management Officers to amend the wording of the conditions, including acceptance that the DEN connection would no longer be required. The proposal would therefore be acceptable.

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	The internal heat gains is very high due to the type of engineering equipment used in the buildings, therefore mechanical cooling is proposed to maintain compliance with TM52. The shading features have been included in the architectural elevations and sections. <table><tr><td>Non-domestic: CIBSE TM52</td><td>Number of habitable spaces that pass at least 2 out of 3 criteria 1: hours of exceedance 2: daily weighted exceedance 3: upper limit temperature</td></tr><tr><td>DSY1 2020s</td><td>16/16</td></tr><tr><td>DSY2 2020s</td><td>16/16</td></tr><tr><td>DSY3 2020s</td><td>16/16</td></tr></table> All spaces pass the overheating requirements for 2020s DSY1. In order to pass this, the following measures will be built: - MVHR - G-value of 0.40 - Air permeability of 1 m³/hm² @ 50Pa - Internal blinds (not included in the modelling) The following actions are covered by the recommended overheating condition. <u>Actions:</u> - Undertake further modelling: - o Also, model 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. - Set out a retrofit plan for future weather files, demonstrating how these measures can be installed and who will be responsible for overheating risk. 5. Sustainability The submitted bird and bat box plan has proposed the following:	Non-domestic: CIBSE TM52	Number of habitable spaces that pass at least 2 out of 3 criteria 1: hours of exceedance 2: daily weighted exceedance 3: upper limit temperature	DSY1 2020s	16/16	DSY2 2020s	16/16	DSY3 2020s	16/16	
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DSY1 2020s	16/16									
DSY2 2020s	16/16									
DSY3 2020s	16/16									

Stakeholder	Question/Comment	Response
	- 2 no. sparrow terrace - 1 no. swift box - 1 no. general nest box - 2 no. bat box - 3 no. insect houses 6. Planning Obligations Heads of Terms - Be Seen commitment to uploading energy data - Energy Plan - Sustainability Review - Estimated carbon offset contribution (and associated obligations) of £23,085 (indicative), plus a 10% management fee; carbon offset contribution to be re-calculated at £2,850 per tCO2 at the Energy Plan and Sustainability stages. 7. Planning Conditions To be secured: <i>Energy Strategy:</i> As recommended previously. <i>Living Roof:</i> As recommended previously. <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> • <i>Further detail of how the developer will ensure the performance of the DEN system will be safeguarded through later stages of design (e.g. value engineering proposals by installers), construction and commissioning including provision of key information on system performance required by CoP1 (e.g. joint weld and HIU commissioning certificates, CoP1 checklists, etc.);</i> • <i>Peak heat load calculations in accordance with CIBSE CP1 Heat Networks: Code of Practice for the UK (2020) taking account of diversification.</i> • <i>Detail of the pipe design, pipe sizes and lengths (taking account of flow and return temperatures and diversification), insulation and calculated heat loss from the</i>	

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	<i>pipes in Watts, demonstrating heat losses have been minimised together with analysis of stress/expansion;</i> <i>• A before and after floor plan showing how the plant room can accommodate a heat substation for future DEN connection. The heat substation shall be sized to meet the peak heat load of the site. The drawings should cover details of the phasing including any plant that needs to be removed or relocated and access routes for installation of the heat substation;</i> <i>• Details of the route for the primary pipework from the energy centre to a point of connection at the site boundary including evidence that the point of connection is accessible by the area wide DEN, detailed proposals for installation for the route that shall be coordinated with existing and services, and plans and sections showing the route for three 100mm diameter communications ducts;</i> <i>• Details of the location for building entry including dimensions, isolation points, coordination with existing services and detail of flushing/seals;</i> <i>• Details of the location for the set down of a temporary plant to provide heat to the development in case of an interruption to the DEN supply including confirmation that the structural load bearing of the temporary boiler location is adequate for the temporary plant and identify the area/route available for a flue;</i> <i>• Details of a future pipework route from the temporary boiler location to the plant room.</i> <i>Reason: To ensure the development reduces its impact on climate change by reducing carbon emissions on site in compliance with the Energy Hierarchy, and in line with London Plan (2021) Policy SI2 and SI3, and Local Plan (2017) Policies SP4 and DM22.</i> Overheating <i>Prior to the above ground commencement of the development, an updated Overheating Report shall be submitted to and approved by the Local Planning Authority. The submission shall assess the overheating risk and propose a retrofit plan. This assessment shall be based on CIBSE TM54 – Operational Energy Report prepared by Introba Consulting Ltd (dated February 2024)</i>	

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	<i>This report shall include:</i> - <i>Revised modelling of units modelled based on CIBSE TM52, using the CIBSE TM49 London Weather Centre files for the DSY1-3 (2020s) and DSY1 2050s and 2080s, high emissions, 50% percentile;</i> - <i>Demonstrating the mandatory pass for DSY1 2020s can be achieved properly following the Cooling Hierarchy and in compliance with Building Regulations Part O, demonstrating that any risk of crime, noise and air quality issues are mitigated appropriately evidenced by the proposed location and specification of measures;</i> - <i>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;</i> - <i>Confirmation that the retrofit measures can be integrated within the design (e.g., if there is space for pipework to allow the retrofitting of cooling and ventilation equipment), setting out mitigation measures in line with the Cooling Hierarchy;</i> - <i>Confirmation who will be responsible to mitigate the overheating risk once the development is occupied.</i> <i>(b) Prior to occupation of the development, details of internal blinds to all habitable rooms must be submitted for approval by the local planning authority. This should include the fixing mechanism, specification of the blinds, shading coefficient, etc. Occupiers must retain internal blinds for the lifetime of the development, or replace the blinds with equivalent or better shading coefficient specifications.</i> <i>(c) Prior to occupation, the development must be built in accordance with the approved overheating measures and retained thereafter for the lifetime of the development:</i> - <i>Openable windows;</i> - <i>Fixed internal blinds with white backing;</i> - <i>Window g-values of 0.40 or better;</i> - <i>Air permeability of 1 m³/hm² @ 50Pa</i> - <i>Mechanical ventilation with heat recovery;</i> - <i>Hot water pipes insulated to high standards.</i> - <i>Any further mitigation measures as approved by or superseded by the latest approved Overheating Strategy.</i>	

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	<i>If the design of Blocks is amended, or the heat network pipes will result in higher heat losses and will impact on the overheating risk of any units, a revised Overheating Strategy must be submitted as part of the amendment application.</i> <i>REASON: In the interest of reducing the impacts of climate change, to enable the Local Planning Authority to assess overheating risk and to ensure that any necessary mitigation measures are implemented prior to construction, and maintained, in accordance with London Plan (2021) Policy SI4 and Local Plan (2017) Policies SP4 and DM21.</i> Biodiversity Net Gain <i>(a) Prior to the commencement of development, details of ecological enhancement measures and ecological protection measures shall be submitted to and approved in writing by the Council. This shall detail the biodiversity net gain, plans showing the proposed location of ecological enhancement measures, a sensitive lighting scheme, justification for the location and type of enhancement measures by a qualified ecologist, and how the development will support and protect local wildlife and natural habitats.</i> <i>(b) Within six months of occupation, photographic evidence and a post-development ecological field survey and impact assessment shall be submitted to and approved by the Local Planning Authority to demonstrate the delivery of the ecological enhancement and protection measures is in accordance with the approved measures and in accordance with CIEEM standards.</i> <i>Development shall accord with the details as approved and retained for the lifetime of the development.</i> <i>Reason: To ensure that the development provides the maximum provision towards the creation of habitats for biodiversity and the mitigation and adaptation of climate change. In accordance with London Plan (2021) Policies G1, G5, G6, SI1 and SI2 and Local Plan (2017) Policies SP4, SP5, SP11 and SP13.</i> BREEAM Certificate <i>(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</i>	

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	<i>confirming that the development will achieve a BREEAM “Very Good” outcome (or equivalent), aiming for “Excellent”. This should be accompanied by a tracker demonstrating which credits are being targeted, and why other credits cannot be met on site.</i> <i>The development shall then be constructed in strict accordance with the details so approved, shall achieve the agreed rating and shall be maintained as such thereafter for the lifetime of the development.</i> <i>(b) Within six months of occupation, a post-construction certificate issued by the Building Research Establishment must be submitted to the local authority for approval, confirming this standard has been achieved.</i> <i>In the event that the development fails to achieve the agreed rating for the development, a full schedule and costings of remedial works required to achieve this rating shall be submitted for our written approval with 2 months of the submission of the post construction certificate. Thereafter the schedule of remedial works must be implemented on site within 3 months of the Local Authority’s approval of the schedule, or the full costs and management fees given to the Council for offsite remedial actions.</i> <i>Reason: In the interest of addressing climate change and securing sustainable development in accordance with London Plan (2021) Policies SI2, SI3 and SI4, and Local Plan (2017) Policies SP4 and DM21.</i> Carbon Management Response 17/06/2024 In preparing this consultation response, we have reviewed: • Energy Assessment Report prepared by Introba Consulting Ltd (dated February 2024) • CIBSE TM54 – Operational Energy Report prepared by Introba Consulting Ltd (dated February 2024) • Applicant’s response dated 7 June 2024 • Relevant supporting documents.	

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	1. Summary The development achieves a reduction of 36% carbon dioxide emissions on site. 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 cooling demand is higher than the notional cooling demand which indicates the need for design interventions incorporating passive design solutions to improve the energy efficiency of the building fabric and mitigating overheating risks. The overheating assessment has not properly followed the cooling hierarchy – exploring possible passive design solutions to mitigate overheating risks and reducing overall cooling demand before introducing mechanical forms of cooling. Further information needs to be provided in relation to the Energy and Overheating Strategy. This should be addressed prior to the determination of the application or should be addressed through planning conditions. Appropriate conditions have been recommended. 2. Energy Strategy The applicant has now submitted the GLA carbon emission reporting spreadsheet which show the Energy Use Intensity and space heating demand as follows: <table border="1"> <thead> <tr> <th></th><th>Proposed Development</th><th>GLA Benchmark</th></tr> </thead> <tbody> <tr> <td>Building type</td><td>School</td><td>School/College</td></tr> <tr> <td>EUI</td><td>72.68 kWh/m²/year</td><td>Does not meet GLA benchmark of 65kWh/m²/year</td></tr> <tr> <td>SHD</td><td>12.57 kWh/m²/year</td><td>Meets the GLA benchmark of 15 kWh/m²/year</td></tr> <tr> <td>Methodology used</td><td>Part L2 – SBEM & none</td><td></td></tr> </tbody> </table> <u>Actions:</u>		Proposed Development	GLA Benchmark	Building type	School	School/College	EUI	72.68 kWh/m ² /year	Does not meet GLA benchmark of 65kWh/m ² /year	SHD	12.57 kWh/m ² /year	Meets the GLA benchmark of 15 kWh/m ² /year	Methodology used	Part L2 – SBEM & none		
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	- 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 65 kWh/m²/year. Energy – Lean The applicant has proposed a saving of 3% in carbon emission. 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. The proposal has considered numerous principles from the LETI Climate Emergency Design Guide for the façade design and have proposed the following ratio of glazed windows: - North Façade = 14.20 % - East Façade = 26.42 % - West Façade = 16.95 % - South Façade = 19.05 % <u>Actions:</u> - Please explore fabric energy efficiency measures in line with the fabric first approach as set in the London Plan Policy SI2. Overheating is dealt with in more detail below. Energy – Clean The proposed building has been designed allowing for a future connection to the district network and the submitted drawings show a dedicated plant space on the roof level for DEN plant. <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 layout and schematics according to the standards.	

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	Energy – Green The proposed solar PV covers 60% of the available roof space and the other roof spaces are not feasible for installing solar panels as it is taken up by plant or is not accessible as per the report. The generated energy is proposed to be consumed on-site by college equipment and main plant. It is recommended to explore further opportunities to maximise on-site renewable energy generation in line with the London Plan Policy SI2. The proposed heat pumps is designed to provide 100% heating and hot water, while immersion heaters are also provided in hot water cylinders for resilience of the system. Energy – Be Seen The applicant has shared the Be Seen reporting spreadsheet. <u>Actions:</u> - Please provide the evidence of submission to the GLA Be Seen portal. 3. Carbon Offset Contribution A carbon shortfall of 8.1 tCO₂/year remains. The remaining carbon emissions will need to be offset at £95/tCO₂ over 30 years. 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 TM52 with TM49 weather files, and the cooling hierarchy has been followed in the design. The report has modelled 8 classrooms, workshops and offices under the London Heathrow files.	

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	Non-domestic: CIBSE TM52	Number of habitable spaces that pass at least 2 out of 3 criteria 1: hours of exceedance 2: daily weighted exceedance 3: upper limit temperature	
	DSY1 2020s	16/16	
	DSY2 2020s	16/16	
	DSY3 2020s	16/16	
	DSY1 2050s		
	DSY2 2050s		
	DSY3 2050s		
	DSY1 2080s		
	DSY2 2080s		
	DSY3 2080s		
	All spaces pass the overheating requirements for 2020s DSY1. In order to pass this, the following measures will be built: No future mitigation measures are proposed. <u>Actions:</u> - It is unclear which weather files is used for the assessment. Please confirm if Central London weather files and if not please remodel with the LWC weather files, which will more accurately represent the urban heat island effect. Please follow the guidelines as per the Haringey's Key Overheating Planning Application Requirements. - The cooling demand is very high than the notional cooling demand. Please follow the cooling hierarchy in order and step by step, and first implement all passive measures to reduce the overheating risk and the cooling demand before introducing any mechanical form of cooling. - External shading features such as overhangs, Brise Soleil, etc) should be explored and proposed to reduce the cooling demand as much as possible. - o Specify the shading strategy, including technical specification and images of the proposed shading feature, elevations and sections showing where these		

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	measures are proposed. Provide the technical specification and images of the proposed shading feature, elevations and sections showing where these measures are proposed. - Internal blinds cannot be used to pass the weather files but can form part of the delivered strategy to reduce overheating risk for occupants (as long as it does not compromise any ventilation requirements). - Submit an annotated plan specifying the ventilation strategy and overheating risk mitigation strategy. - Undertake further modelling: - o Also, model 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. - Set out a retrofit plan for future weather files, demonstrating how these measures can be installed and who will be responsible for overheating risk. 5. Sustainability The applicant has proposed improvements to the existing cycle facilities including the upgrading of existing covered shelter and adding extra Sheffield standards resulting 20 additional spaces for cycle storage. The applicant has agreed to provide annotated plans of the proposed urban greening and biodiversity enhancement measures. <u>Actions:</u> - Please provide the annotated plans of the proposed urban greening and biodiversity enhancement measures (e.g. green infrastructure, bird boxes, bat boxes etc to connect to the green spaces around the site, living roofs, living walls, etc.) 6. Planning Obligations Heads of Terms - Be Seen commitment to uploading energy data - Energy Plan - Sustainability Review	

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	- Estimated carbon offset contribution (and associated obligations) of £23,085 (indicative), plus a 10% management fee; carbon offset contribution to be re-calculated at £2,850 per tCO2 at the Energy Plan and Sustainability stages. 7. Planning Conditions To be secured with amendments expected to the wording below once the revised information has been submitted. <i>Energy strategy</i> <i>The development hereby approved shall be constructed in accordance with the Energy Assessment Report prepared by Introba Consulting Ltd (dated February 2024) delivering a minimum 36% improvement on carbon emissions over 2021 Building Regulations Part L, with SAP10 emission factors, high fabric efficiencies, communal air source heat pumps (ASHPs) and a minimum 45.6kWp solar photovoltaic (PV) array.</i> <i>(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> - <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 3% 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>Location, specification and efficiency of the proposed ASHPs (Coefficient of Performance, Seasonal Coefficient of Performance, and the Seasonal Performance Factor), with plans showing the ASHP pipework and noise and visual mitigation measures;</i> - <i>Specification and efficiency of the proposed Mechanical Ventilation and Heat Recovery (MVHR), with plans showing the rigid MVHR ducting and location of the unit;</i> - <i>Details of the PV, demonstrating the roof area has been maximised, with the following details: a roof plan; the number, angle, orientation, type, and efficiency level of the PVs; how overheating of the panels will be minimised; their peak output (kWp); and how the energy will be used on-site before exporting to the grid;</i> - <i>Specification of any additional equipment installed to reduce carbon emissions;</i>	

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	- <i>A metering strategy</i> <i>The development shall be carried out strictly in accordance with the details so approved prior to first operation and shall be maintained and retained for the lifetime of the development. The solar PV array shall be installed with monitoring equipment prior to completion and shall be maintained at least annually thereafter.</i> <i>(b) The solar PV arrays/ air source heat pump(s) must be installed and brought into use prior to first occupation of the relevant block. Six months following the first occupation of that block, evidence that the solar PV arrays have been installed correctly and are operational shall be submitted to and approved by the Local Planning Authority, including photographs of the solar array, installer confirmation, an energy generation statement for the period that the solar PV array has been installed, and a Microgeneration Certification Scheme certificate.</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> <i>• Further detail of how the developer will ensure the performance of the DEN system will be safeguarded through later stages of design (e.g. value engineering proposals by installers), construction and commissioning including provision of key information on system performance required by CoP1 (e.g. joint weld and HIU commissioning certificates, CoP1 checklists, etc.);</i> <i>• Peak heat load calculations in accordance with CIBSE CP1 Heat Networks: Code of Practice for the UK (2020) taking account of diversification.</i>	

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	• <i>Detail of the pipe design, pipe sizes and lengths (taking account of flow and return temperatures and diversification), insulation and calculated heat loss from the pipes in Watts, demonstrating heat losses have been minimised together with analysis of stress/expansion;</i> • <i>A before and after floor plan showing how the plant room can accommodate a heat substation for future DEN connection. The heat substation shall be sized to meet the peak heat load of the site. The drawings should cover details of the phasing including any plant that needs to be removed or relocated and access routes for installation of the heat substation;</i> • <i>Details of the route for the primary pipework from the energy centre to a point of connection at the site boundary including evidence that the point of connection is accessible by the area wide DEN, detailed proposals for installation for the route that shall be coordinated with existing and services, and plans and sections showing the route for three 100mm diameter communications ducts;</i> • <i>Details of the location for building entry including dimensions, isolation points, coordination with existing services and detail of flushing/seals;</i> • <i>Details of the location for the set down of a temporary plant to provide heat to the development in case of an interruption to the DEN supply including confirmation that the structural load bearing of the temporary boiler location is adequate for the temporary plant and identify the area/route available for a flue;</i> • <i>Details of a future pipework route from the temporary boiler location to the plant room.</i> <i>Reason: To ensure the development reduces its impact on climate change by reducing carbon emissions on site in compliance with the Energy Hierarchy, and in line with London Plan (2021) Policy SI2 and SI3, and Local Plan (2017) Policies SP4 and DM22.</i> Overheating <i>Prior to the commencement of development, an overheating model and report shall be resubmitted to and approved by the Local Planning Authority. The model will assess the overheating risk in line with CIBSE TM52 (using the London Weather Centre TM49 weather DSY1-3 files for the 2020s, and DSY1 for the 2050s and 2080s) and demonstrate how the</i>	

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	<i>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.</i> <i>This report will include:</i> - <i>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;</i> - <i>Specify the shading strategy, including technical specification and images of the proposed shading feature (e.g. overhangs, Brise Soleil, or external shutters).</i> - <i>Provide the elevations and sections plans to show where these measures are proposed.</i> - <i>Include images indicating which sample units were modelled and floorplans showing the modelled internal layout of buildings.</i> - <i>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;</i> <i>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.</i> <i>Reason: In the interest of reducing the impacts of climate change, to enable the Local Planning Authority to assess overheating risk and to ensure that any necessary mitigation measures are implemented prior to construction, and maintained, in accordance with London Plan (2021) Policy SI4 and Local Plan (2017) Policies SP4 and DM21.</i>	

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	BREEAM Certificate <i>(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.</i> <i>The development shall then be constructed in strict accordance with the details so approved, shall achieve the agreed rating and shall be maintained as such thereafter for the lifetime of the development.</i> <i>(b) Prior to occupation, a post-construction certificate issued by the Building Research Establishment must be submitted to the local authority for approval, confirming this standard has been achieved.</i> <i>In the event that the development fails to achieve the agreed rating for the development, a full schedule and costings of remedial works required to achieve this rating shall be submitted for our written approval with 2 months of the submission of the post construction certificate. Thereafter the schedule of remedial works must be implemented on site within 3 months of the Local Authority’s approval of the schedule, or the full costs and management fees given to the Council for offsite remedial actions.</i> <i>Reason: In the interest of addressing climate change and securing sustainable development in accordance with London Plan (2021) Policies SI2, SI3 and SI4, and Local Plan (2017) Policies SP4 and DM21.</i> Living roof <i>(a) Prior to the above ground commencement of development, details of the living roofs must be submitted to and approved in writing by the Local Planning Authority. Living roofs must be planted with flowering species that provide amenity and biodiversity value at different times of year. Plants must be grown and sourced from the UK and all soils and compost used must be peat-free, to reduce the impact on climate change. The submission shall include:</i>	

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	<i>i) A roof plan identifying where the living roofs will be located; A ground floor plan identifying where the living walls will be rooted in the ground, if any;</i> <i>ii) A section demonstrating settled substrate levels of no less than 120mm for extensive living roofs (varying depths of 120-180mm), and no less than 250mm for intensive living roofs (including planters on amenity roof terraces);</i> <i>iii) Roof plans annotating details of the substrate: showing at least two substrate types across the roofs, annotating contours of the varying depths of substrate</i> <i>iv) Details of the proposed type of invertebrate habitat structures with a minimum of one feature per 30m² of living roof: substrate mounds and 0.5m high sandy piles in areas with the greatest structural support to provide a variation in habitat; semi-buried log piles / flat stones for invertebrates with a minimum footprint of 1m², rope coils, pebble mounds of water trays;</i> <i>v) Details on the range and seed spread of native species of (wild)flowers and herbs (minimum 10g/m²) and density of plug plants planted (minimum 20/m² with root ball of plugs 25cm³) to benefit native wildlife, suitable for the amount of direct sunshine/shading of the different living roof spaces. The living roofs will not rely on one species of plant life such as Sedum (which are not native);</i> <i>vi) Roof plans and sections showing the relationship between the living roof areas and photovoltaic array; and</i> <i>vii) Management and maintenance plan, including frequency of watering arrangements.</i> <i>viii) A section showing the build-up of the blue roofs and confirmation of the water attenuation properties, and feasibility of collecting the rainwater and using this on site;</i> <i>(b) Prior to the occupation of 90% of the development, evidence must be submitted to and approved by the Local Planning Authority that the living roofs have been delivered in line with the details set out in point (a). This evidence shall include photographs demonstrating the measured depth of substrate, planting and biodiversity measures. If the Local Planning Authority finds that the living roofs have not been delivered to the approved standards, the applicant shall rectify this to ensure it complies with the condition. The living roofs shall be retained thereafter for the lifetime of the development in accordance with the approved management arrangements.</i> <i>Reason: To ensure that the development provides the maximum provision towards the creation of habitats for biodiversity and supports the water retention on site during rainfall. In</i>	

Stakeholder	Question/Comment	Response
	<i>accordance with London Plan (2021) Policies G1, G5, G6, SI1 and SI2 and Local Plan (2017) Policies SP4, SP5, SP11 and SP13.</i> <i>Biodiversity Net Gain</i> <i>(a) Prior to the commencement of development, details of ecological enhancement measures and ecological protection measures shall be submitted to and approved in writing by the Council. This shall detail the biodiversity net gain, plans showing the proposed location of ecological enhancement measures, a sensitive lighting scheme, justification for the location and type of enhancement measures by a qualified ecologist, and how the development will support and protect local wildlife and natural habitats.</i> <i>(b) Prior to the occupation of development, photographic evidence and a post-development ecological field survey and impact assessment shall be submitted to and approved by the Local Planning Authority to demonstrate the delivery of the ecological enhancement and protection measures is in accordance with the approved measures and in accordance with CIEEM standards.</i> <i>Development shall accord with the details as approved and retained for the lifetime of the development.</i> <i>Reason: To ensure that the development provides the maximum provision towards the creation of habitats for biodiversity and the mitigation and adaptation of climate change. In accordance with London Plan (2021) Policies G1, G5, G6, SI1 and SI2 and Local Plan (2017) Policies SP4, SP5, SP11 and SP13.</i> Carbon Management Response 24/05/2024 In preparing this consultation response, we have reviewed: • Energy Assessment Report prepared by Introba Consulting Ltd (dated February 2024) • Sustainable Design and Construction Statement by Introba Consulting Ltd (dated February 2024) • BREEAM Pre-Assessment prepared by SRE Ltd (dated February 2024)	

Stakeholder	Question/Comment	Response
	• Urban Greening Factor Assessment by Assystem Energy & Infrastructure Ltd (dated February 2024) • Biodiversity Net Gain Assessment by Assystem Energy & Infrastructure Ltd (dated February 2024) • Relevant supporting documents. 1. Summary The development achieves a reduction of 36% carbon dioxide emissions on site. 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. It was requested in the pre-app advice that to action the college's ambition to become carbon neutral by 2030 and to be exemplary within the borough and North London, the applicant should aim for a net zero-carbon development on-site and explore the best low whole-life carbon design solutions with maximised on-site renewable energy generation, enhanced biodiversity, and urban greening. As mentioned in the pre-app advice, it is recommended to carry out a whole life carbon assessment and submit a circular economy statement to demonstrate how exemplary scheme this is. Carbon Management cannot currently support this application. The development does not currently meet: • London Plan Policy SI2 and Local Plan Policy SP4: the development does not achieve the policy objective's minimum 15% on-site carbon reduction under Be Lean and does not maximise opportunities to reduce energy use through the Energy Hierarchy. Haringey's evidence base demonstrates that a higher carbon reduction is achievable for a school building for a similar typology. • 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.	

Stakeholder	Question/Comment	Response																																
	Further information needs to be provided to address this objection, in relation to the Energy Strategy, Overheating Strategy, and approach to whole life carbon and circular economy principles. 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 36% in carbon emissions with SAP10.2 carbon factors, from the Baseline development model (which is Part L 2021 compliant). This represents an annual saving of approximately 4.5 tonnes of CO₂ from a baseline of 12.6tCO₂/year. London Plan Policy SI2 requires major development proposals to calculate and minimise unregulated carbon emissions, not covered by Building Regulations. The calculated unregulated emissions are: 11.3 tCO₂. <table><tr><th><i>(SAP10 emission factors)</i></th><th>Total regulated emissions (tCO₂/ year)</th><th>CO₂ savings (tCO₂/ year)</th><th>Percentage savings (%)</th></tr><tr><td>Part L 2021 Baseline</td><td>12.6</td><td></td><td></td></tr><tr><td>Be Lean savings</td><td>12.2</td><td>0.4</td><td>3%</td></tr><tr><td>Be Clean savings</td><td>12.2</td><td>0.0</td><td>0%</td></tr><tr><td>Be Green savings</td><td>8.1</td><td>4.1</td><td>33%</td></tr><tr><td>Cumulative savings</td><td></td><td>4.5</td><td>36%</td></tr><tr><td>Carbon shortfall to offset (tCO₂)</td><td>8.1</td><td></td><td></td></tr><tr><td>Carbon offset contribution</td><td colspan="3">£95 x 30 years x 8.1 tCO₂/year = £23,085</td></tr></table>	<i>(SAP10 emission factors)</i>	Total regulated emissions (tCO ₂ / year)	CO ₂ savings (tCO ₂ / year)	Percentage savings (%)	Part L 2021 Baseline	12.6			Be Lean savings	12.2	0.4	3%	Be Clean savings	12.2	0.0	0%	Be Green savings	8.1	4.1	33%	Cumulative savings		4.5	36%	Carbon shortfall to offset (tCO ₂)	8.1			Carbon offset contribution	£95 x 30 years x 8.1 tCO ₂ /year = £23,085			
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Stakeholder	Question/Comment		Response													
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	<u>Actions:</u> - Please submit the full GLA’s Carbon Emission Reporting Spreadsheet.															
	Energy Use Intensity (EUI) / Space Heating Demand (SHD) Applications are required to report on the total Energy Use Intensity (EUI) and Space Heating Demand (SHD), in line with the GLA Energy Assessment Guidance (June 2022). The Energy Strategy should follow the reporting template set out in Table 5 of the guidance, including what methodology has been used. EUI is a measure of the total energy consumed annually, but should exclude on-site renewable energy generation and energy use from electric vehicle charging.															
	<table><tr><td></td><td>Proposed Development</td><td>GLA Benchmark</td></tr><tr><td>Building type</td><td></td><td>School/College</td></tr><tr><td>EUI</td><td>___ kWh/m²/year</td><td>Meets/Does not meet GLA benchmark of 65kWh/m²/year</td></tr><tr><td>SHD</td><td>___ kWh/m²/year</td><td>Meets/Does not meet GLA benchmark of 15 kWh/m²/year</td></tr><tr><td>Methodology used</td><td>TBC</td><td></td></tr></table>			Proposed Development		GLA Benchmark	Building type		School/College	EUI	___ kWh/m²/year	Meets/Does not meet GLA benchmark of 65kWh/m²/year	SHD	___ kWh/m²/year	Meets/Does not meet GLA benchmark of 15 kWh/m²/year	Methodology used
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<u>Actions:</u> - What is the calculated Energy Use Intensity (excluding renewable energy)? How does this perform against GLA benchmarks, i.e. at 65 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																

Stakeholder	Question/Comment	Response																										
	London Plan Policy SI2 requires non-residential developments to improve emissions by at least 15% under Be Lean. The applicant has proposed a saving of 4.5 tCO₂ in carbon emissions (3%) 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 ASHP 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: <table><tr><td>Floor u-value</td><td>0.12 W/m²K</td></tr><tr><td>External wall u-value</td><td>0.15 W/m²K</td></tr><tr><td>Roof u-value</td><td>0.12 W/m²K</td></tr><tr><td>Door u-value</td><td>1.00 W/m²K</td></tr><tr><td>Window u-value</td><td>1.00 W/m²K</td></tr><tr><td>G-value</td><td>0.40</td></tr><tr><td>Air permeability rate</td><td>1 m³/hm² @ 50Pa</td></tr><tr><td>Ventilation strategy</td><td>Air Handling Unit + VAV System SFP 1.2 and Heat Recovery 80%</td></tr><tr><td>Waste Water Heat recovery?</td><td>TBC</td></tr><tr><td>Thermal bridging</td><td>Accredited Construction Details</td></tr><tr><td>Low energy lighting</td><td>100%</td></tr><tr><td>Heating system (efficiency / emitter) Be Lean</td><td>ASHP 264%</td></tr><tr><td>Thermal mass</td><td>TBC</td></tr></table> <u>Actions:</u> - Please identify on a plan where the VAV system will be located within the buildings. The units should be less than 2m away from external walls. This detail can also be conditioned. - What is the proportion of glazed area? Consider following the LETI Climate Emergency Design Guide principles in façade design.	Floor u-value	0.12 W/m²K	External wall u-value	0.15 W/m²K	Roof u-value	0.12 W/m²K	Door u-value	1.00 W/m²K	Window u-value	1.00 W/m²K	G-value	0.40	Air permeability rate	1 m³/hm² @ 50Pa	Ventilation strategy	Air Handling Unit + VAV System SFP 1.2 and Heat Recovery 80%	Waste Water Heat recovery?	TBC	Thermal bridging	Accredited Construction Details	Low energy lighting	100%	Heating system (efficiency / emitter) Be Lean	ASHP 264%	Thermal mass	TBC	
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Stakeholder	Question/Comment	Response
	- Set out how the scheme's thermal bridging will be reduced. 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? Commercial - Submit the individual end use BER for specific end users in line w CIBSE Guide F. - How will the passive ventilation work? Please provide a diagram to demonstrate the system and confirm how many air changes per hour this will achieve. 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 Be Clean strategy to connect to the DEN in Tottenham Hale or extended network which is generally acceptable. The proposed building has been designed allowing for a future connection to the district network. Some evidence should be provided that the DEN system was inputted into the SAP model and that the plant room is adequately sized for a substation. <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 layout and schematics. Energy – Green	

Stakeholder	Question/Comment	Response
	As part of the Be Green carbon reductions, all new developments must achieve a minimum reduction of 20% from on-site renewable energy generation to comply with Policy SP4. The application has reviewed the installation of various renewable technologies. The report concludes that air source heat pumps (ASHPs) and solar photovoltaic (PV) panels are the most viable options to deliver the Be Green requirement. A total of 4.1 tCO₂ (33%) reduction of emissions are proposed under Be Green measures. The solar array peak output would be 45.6kWp, which is estimated to produce around 27,063 kWh/year of renewable electricity per year, equivalent to a reduction of 3.68tCO₂/year. 54 m² of panels with 30 degrees of inclination are proposed on the South-East side of the roof. 122.4 m² are horizontally placed (0-degree angle) above the green roof area (60% of the whole area). 40m² are horizontally placed (0-degree angle) mounted on frames above the MEP systems (22% of the whole area). The communal air-to-water ASHP systems (heating SCOP of 3.30, DHW SCOP of 3.40 and SEER of 4.50) will provide hot water and heating to the buildings. The location of the proposed Solar PV panels is as below:	

Stakeholder	Question/Comment	Response
	<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? - 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 air source heat pumps will be located and how the units will be mitigated in terms of visual and noise impact. - How much of the heating/hot water demand will be met by the proposed types of heat pumps? If this cannot be met fully, how will this be supplemented? Energy – Be Seen	

Stakeholder	Question/Comment	Response
	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. A public display of energy usage and generation should also be provided in the main entrance area to raise awareness of residents/businesses. - What are the unregulated emissions and proposed demand-side response to reducing energy: smart grids, smart meters, battery storage? 3. Carbon Offset Contribution A carbon shortfall of 8.1 tCO₂/year remains. The remaining carbon emissions will need to be offset at £95/tCO₂ over 30 years. 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. No thermal dynamic overheating assessment has been done. The SAP methodology is not sufficient to assess overheating risk. <u>Actions:</u> - Demonstrate the cooling hierarchy has been followed - o Internal heat generation, i.e. heat distribution infrastructure - o Heat entering building, i.e. shutters, trees, vegetation, blinds - o Manage heat through thermal mass and high ceilings - o Passive ventilation, i.e. openable windows, shallow floorplates, dual aspect, stack effect	

Stakeholder	Question/Comment	Response
	○ Mechanical ventilation, i.e. free cooling from outside air in shade, by-pass summer mode - Undertake a Thermal Dynamic Overheating Assessment to demonstrate any potential overheating risk has been mitigated. This must be done in line with CIBSE TM52 with TM49 weather files. - The assumptions and inputs should be clearly reported within the overheating assessment. - Model the following most likely to overheat rooms: ○ At least 15% of all rooms across the development site; ○ At least 50% of rooms on the top floor; ○ 75% of all modelled rooms will face South or South/western facing; ○ Rooms/spaces closest to any significant noise and / or air pollution source, with windows closed at all times (unless they do not need to be opened and confirmed in the Noise and the Air Quality Assessments); ○ Communal spaces; ○ Heat losses from pipework and heat interface units for community heating systems - Model all three Design Summer Years 1-3 (DSY), in the urban dataset; - Model all future weather patterns to projected impacts over the time periods 2020s, 2050s and 2080s, the risks, impacts and mitigation strategy set out for each; - Implement mitigation measures and demonstrate compliance with DSY1 for 2020s weather file (high emissions, 50% percentile); - Set out a retrofit plan for future weather files, demonstrating how these measures can be installed and who will be responsible for overheating risk. 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, materials and waste, water consumption, flood risk and drainage, biodiversity, climate resilience, energy and CO2 emissions and landscape design. <u>Action:</u>	

Stakeholder	Question/Comment	Response
	- Annotate on plans the proposed urban greening and biodiversity enhancement measures (e.g. green infrastructure, bird boxes, bat boxes etc to connect to the green spaces around the site, living roofs, living walls, etc.) - How will the development increase staff uptake of active travelling (through safe, secure and weatherproof cycle facilities). <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 for the proposed development. Based on this report, a score of 68.15% is expected to be achieved, equivalent to 'Very Good' rating. A potential score of 77.58% could be achieved. <i>Urban Greening / Biodiversity</i> All development sites must incorporate urban greening within their fundamental design and submit an Urban Greening Factor Statement, in line with London Plan Policy G5. London Plan Policy G6 and Local Plan Policy DM21 require proposals to manage impacts on biodiversity and aim to secure a biodiversity net gain. Additional greening should be provided through high-quality, durable measures that contribute to London's biodiversity and mitigate the urban heat island impact. This should include tree planting, shrubs, hedges, living roofs, and urban food growing. Specifically, living roofs and walls are encouraged in the London Plan. Amongst other benefits, these will increase biodiversity and reduce surface water runoff. The Biodiversity Net Gain calculation shows a net gain of 80.81%, which is above the 10% requirement as set out in the Environment Act 2021. The development achieves an Urban Greening Factor of 0.30. This complies with the interim minimum target of 0.3 for predominantly non-residential developments in London Plan Policy G5. <i>Living roofs</i>	

Stakeholder	Question/Comment	Response
	All development sites must incorporate urban greening within their fundamental design, in line with London Plan Policy G5. A BioSolar roof, incorporating a biodiverse green roof with wildflowers, supported by a 150mm substrate depth, is proposed across the eastern side of the building, with the remainder of the building comprising artificial surfaces. All landscaping proposals and living roofs should stimulate a variety of planting species. Mat-based, sedum systems are discouraged as they retain less rainfall and deliver limited biodiversity advantages. The growing medium for extensive roofs must be 120-150mm deep, and at least 250mm deep for intensive roofs (these are often roof-level amenity spaces) to ensure most plant species can establish and thrive and can withstand periods of drought. Living walls should be rooted in the ground with sufficient substrate depth. Living roofs are supported in principle, subject to detailed design. Details for living roofs will need to be submitted as part of a planning condition. <i>Whole Life-Cycle Carbon Assessments</i> Policy SI2 requires developments referable to the Mayor of London to submit a Whole Life-Cycle Carbon Assessment and demonstrate actions undertaken to reduce life-cycle emissions. As part of the pre-application advice note, the applicant was advised to carry out Whole Life Carbon assessment and submit Circular Economy Statement to demonstrate the College's ambition to become carbon neutral by 2030. <u>Action:</u> - It is recommended to submit a Whole Life Carbon Assessment as mentioned in the Pre-app note. <i>Circular Economy</i> Policy SI7 requires applications referable to the Mayor of London to submit a Circular Economy Statement demonstrating how it promotes a circular economy within the design	

Stakeholder	Question/Comment	Response
	and aim to be net zero waste. Haringey Policy SP6 requires developments to seek to minimise waste creation and increase recycling rates, address waste as a resource and requires major applications to submit Site Waste Management Plans. The principles used for this development are: - Designing out waste - Designing for longevity - Designing for adaptability or flexibility - Designing for disassembly - Using systems, elements or materials that can be reused and recycled. <u>Action:</u> - It is recommended to submit a detailed Circular Economy Statement as mentioned in the Pre-app note. 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 - Living roof(s) - Circular Economy (Pre-Construction report, Post-Completion report) - Whole-Life Carbon - 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) of £23,085 (indicative), plus a 10% management fee; carbon offset contribution to be re-calculated at £2,850 per tCO2 at the Energy Plan and Sustainability stages.	

Stakeholder	Question/Comment	Response
LBH Conservation Officer	<u>Site</u> The proposed development is located on the western edge of Tottenham Green Conservation Area, which is here characterised as an established, spacious civic space. The development site sits behind the 1970s tower block of the College and is surrounded by statutorily Listed Buildings located immediately to the north of the site and by the locally listed MCC Tottenham Technical College. The development site appears constrained by its densely built immediate context set just behind the spacious historic frontage of the Conservation Area where the established group of Listed Buildings including the Old Fire station, Tottenham Town Hall and The former County School benefit contribute to the imposing civic character of the area through consistent height, similar architectural style and generous gaps between buildings that afford uncluttered views towards the rear of the historic frontage. The buildings surrounding the development site range from the 2 storey cottages and the 3-storey listed old firemen's station to the north, the 8-storey tower block to the east, and the 4-storey residential development to the south and west. The 8-storey tower Block of the college rises above the listed old Fire Station in eastward views along Townhall approach, as well as in northward views of the locally listed college building along the High Road. It is considered to detract from the character of the Conservation Area due to its uncharacteristic scale and height that dominate in views well above the established roofline provided by the listed and locally Listed Buildings forming the historic frontage of the area. <u>Proposal</u> It is proposed to develop a five-storey new building to host the Construction Centre of the College. At pre-application stage officers challenged the spatial and architectural relationship of the proposed new building with its immediate built and	Noted. In this instance, the less than substantial harm to heritage assets arising from the development are considered to be outweighed by the public benefits.

Stakeholder	Question/Comment	Response
	landscape context within the campus, officers were informed that the proposed building would be the first step of a campus-wide master plan, enabled by the demolition and replacement of the existing three storey gym/lecture theatre block, and that further phases of the masterplan will restore the original quadrangle that shaped the development of the main 2005 building. As per pre-application discussion, the proposed development of the Construction Centre is intended to facilitate the masterplan's reconfiguration of the campus and the activation of the proposed Centenary Courtyard space, thus enhancing the designed quality of the School site, and benefitting the Conservation Area as well as enhancing the setting of the locally listed college building. <u>Comments</u> The masterplan improvements to the wider school site should be the basis to comprehensively assess the design success and the impact of the proposed building on its setting. However, the college-wide masterplan is only rapidly illustrated in the final section 5 of the submitted Design and Access statement, where it is unclear how the design and landscape design of the proposed building will relate to the other elements of the masterplan that does not form part of the drawings and designed context to this development proposal. At pre-application stage conservation and design officers advised on the challenges posed by the constrained site, including the spatial and architectural relationship of the proposed building with the rest of the campus, and stressed the importance to coherently enhance the campus through a comprehensive masterplan vision for the future improvement of the college site, so to also enhance the setting of the Conservation Area and of its relevant listed and locally listed assets adjoining the College. The application only includes few contextual drawings showing the proposed building within its campus context, but these only show massing models of the existing buildings, no townscape elevation drawings showing the proposed elevations together with those of the adjoining buildings within and outside the campus have been submitted. The lack of detail about the existing and proposed built context, and the submitted drawings illustrating the proposed building in isolation indicate that the proposed design is not masterplan-led or heritage-led. Instead, the application seems to confirm that the proposed	

Stakeholder	Question/Comment	Response
	design and facades composition are originated by the educational needs of the school, by the 'toolbox' concept, and by broad references to the materiality of the surrounding built environment to be complemented by an array of textured brick detailing to characterise the unprecedented design of the new Construction Centre. It is noted that the proposed design does not seem to be complemented by any soft landscape design integrated with any masterplan ambition and basic hard paving is proposed around the building perimeter and to fill the gap between the western and southern sides of the building and their site boundary, contrarily to their "Centenary Courtyard Proposal" included at the end of the Design and Access Statement. The proposed Construction Centre is illustrated in the application as an individual building to be erected within the existing campus, and therefore needs to be assessed based on its own design merits, as per detailed design officer's comments, and based on its impact of the heritage assets surrounding the development site. Therefore, no site-wide enhancements and public benefits deriving from the illustrative concept of a potential masterplan so unclearly and unconvincingly related to the proposed building can be considered to outweigh any heritage harm at this stage. The proposed scheme has been tested in views of the heritage buildings and their Conservation Area, and no northward view of the High Road frontage has been submitted to show the impact of proposed development on the gap between the College and the locally listed residential building at Sycamore Gardens, but it is understood that the new building will be totally hidden behind the existing frontage buildings of the College and the mature trees along the High Road would further screen the College to the view. It is therefore considered that there will be no negative impact on the locally important college building. The submitted views analysis shows how the new five storey building will only be partially screened in views of the Conservation Area frontage as dynamically experienced from the High Road; this is in part due to its dense built context, but it is especially due to the new building being set just behind the 8-storey large tower block.	

Stakeholder	Question/Comment	Response
	As shown in the views included in the submitted Design and Access statement, the new building will intrude in the background of the listed Tottenham Town hall and Former Fire Station both in views from the Tottenham Green and from Town Hall approach. It will also dominate in the background of the positive contributors firemen cottages as seen from Isobel Place. The new Construction Centre building will undesirably, yet modestly appear behind the listed and locally listed frontage of the Conservation Area in several views, where it would still partially obscure the established gap between the listed Town Hall and the listed Fire Cottage. Filling into visual gaps erodes the established qualities of the setting that have so far contributed to preserve the original character of the Listed Buildings and their Conservation Area. However, due to its relatively modest height, and due to its upper floor being set back in plan from the northern boundary, the new building will not detract from the visual primacy and architectural contribution of the Listed Buildings to the street scene, and it would therefore only have a modestly negative impact on the nationally important Fire Station and Town hall and on their Conservation Area frontage. It is concluded that the proposed development would lead to a low level of less than substantial harm and the assessment of its design quality and public benefits should inform the test set out at Paragraph 208 of the NPPF.	
LBH Design Officer		
LBH Transportation	Transportation Planning Comments HGY/2024/0464, College Of North East London Tottenham Centre, High Road, Tottenham, London, N15 4RU Date: 18/07/2024 Proposal: Demolition of the existing gym/lecture theatre block and the erection of a part four/part five-storey building (2,625 square metres GIA) to host a new Construction and Engineering Centre at the College.	Recommended conditions and s106 heads of terms included. The proposal would therefore be acceptable.

Stakeholder	Question/Comment	Response
	Description An application has been received seeking planning permission to demolish an existing building and build a new part-four/part-five-storey, that will be used for a new Construction and Engineering Centre. The new building will have a floor space of 2,625 sqm. The development would increase the College's on-site cycle parking by 20 spaces. There are currently 17 car parking spaces located within the site that are to be removed and a further existing 20 to be retained that front onto the High Road. However, no new disabled car parking has been proposed. Overall, the college employs 200 fulltime equivalent staff and 2,348 equivalent fulltime student's study on the site. The new building will allow for a maximum increase in occupancy of 35 staff and 352 students. The site is near to the A10 High Road which forms part of Transport for London's Road Network. The development fronts onto Town Hall Approach, which is an adopted highway, and has a speed limit of 20 mph. A bus gate can be found south of the site at the junction with the High Road. The proposal site sits within the Seven Sisters CPZ, which restrict parking to permit holders Monday to Saturday 08:00 – 18:30. The proposal site has a PTAL rating ranges of 6a indicating that its access to public transport is excellent 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 High Road gives convenient access to shops, services, facilities and transport links. The closest station is Seven Sisters Underground that is only around a 6-min walk. The entrance to the Overground from the station is slightly further away on Seven Sisters Road. Cycleway 1 is located outside of the development; it forms a key part of Transport for London's cycle network. Floorspace Existing: 1,030 sqm Proposed: 2,625 sqm Car parking The proposal does include the removal of 17 general parking spaces within the site itself. They are currently being used by staff; no information has been provided on where the trips themselves are likely to be displaced. The development will retain 20 car parking spaces including 3 disabled car parking spaces located in a car park that can be accessed from the	

Stakeholder	Question/Comment	Response
	High Road. The transport assessment concluded that these spaces would be sufficient for both the wider campus and the new building. no numbers have been given on how many staff/students use these spaces. Transport policy still requires that new developments provide disabled parking with the London Plan 2021 Policy T6.5 Non-residential disabled person parking requires that education uses provide 5% designated bays of total parking and 5% enlarged bays. Therefore, the college will need to provide 1 additional disabled space to be in line with policy, this assessment has been based upon the 17 general car parking left over as 3 within the car park have already been allocated as disabled bays. The policy does further explain that all proposal should include an appropriate level of disabled parking, with at least providing one bay. This issue can be addressed by way of planning condition, which would reallocate one of more of the existing car parking space to form a disabled car parking space. A parking survey has been provided in support of the planning application, the parking stress survey was conducted in the evening after local restrictions had ended, it utilised 6m car lengths for on-street counting, included a number of different bay types, and counted bays within local car parks. The survey found capacity within local car parks ranged from 30% - 68% and on-street resident bays that within the Seven Sisters CPZ it ranged from 78% - 86%. Overall, there appears to be more spare capacity within the local car parks than on-street, though this can be linked with drivers not having pay for on-street bays. It is noted that some roads displayed a percentage of high parking stress where a road is considered not to have enough on-street capacity to absorb more. Trip generation No formal trip information has been received from the developer on this application, as they believe the development will not see any increase in the number of students. However, the development would result in an increase in floor area which from a Transportation planning perspective could result in generation of additional trips to the site. We have concluded based on the submitted technical report which is supported by a survey and given the reduction in the onsite car parking space that the developer proposal is likely to have following mode share: • Walk 25%	

Stakeholder	Question/Comment	Response
	• Cycle 8% • E Scooter 1% • Bus 33% • Rail (train/underground) 25% • Car (as driver) 3% • Car (as passenger) 5% • Cycle parking There are currently only 50 cycle spaces that service the entire campus, that utilise a mix of both long-stay/short-stay parking types. The proposal is only seeking to add an additional 20 cycle spaces, with the following mix being used 4 long-stay and 16 short-stay. It has not been clearly stated how the proposed levels would conform to existing policy requirements within both the published London Plan 2021 Policy T5 Cycle and Transport for London's London Cycling Design Standards (LCDS). It has been noted by both the Council and the applicant that Transport for London's (TfL) own comments welcome this modest uplift, whereas LBH Transport Planning believe that college does not go far enough to meet the London Plan 2021 standards. Cycle parking provision for this development has been assessed against the London Plan 2021 Policy T5 Cycle parking standards for compliance Policy T5 Cycle requires that developments <i>'provide the provision of appropriate levels of cycle parking which should be fit for purpose, secure and well-located and be in accordance with the minimum standards.</i> The requirements for Universities/Colleges are 1 space per 4 FTE staff + 1 space per 20 FTE students for long-stay, and 1 space per 7 FTE students for short-stay. Therefore, the college would need to provide the following 27 long-stay and 50 short-stay spaces as part of the new building. Consequently, this provision is significantly larger than what has been proposed by the applicant, the proposal does only relate to the demolition and construction of a single, but because this is a new planning application it needs to be in accordance with current planning guidance. It has been stated within the Transport Statement that the site currently has facilities for changing and showers on-site within the gym, with lockers for both staff and students. The	

Stakeholder	Question/Comment	Response
	condition and suitability of these facilities are not known given that the gym itself will be relocated and will have other uses. This is supported by TfL's own comments that highlight whether the facilities will be satisfactory for the entire college and this development given its use as a gym. The provision of good commentary facilities is supported by the LCDS that recommends good cycle parking should be designed with this. Finally, the location of the cycle parking is somewhat far from the proposed building, this brings into question the suitability of the proposed cycle provision as both the London Plan 2021 Policy T5 Cycle and the LCDS which requires cycle parking to be fit-for-purpose, secure, and well-located. All issues can be addressed with a pre-commencement planning condition requiring the applicant to submit details of cycle parking spaces in line with the London Plan 2021 Policy T5 Cycle and Transport for London's London Cycle Design Standards (LCDS) which must be submitted and approved before development commences on site. Travel plan A draft Travel Plan has been received and included within the submission. It has been provided as a site wide document that covers all employees and students, rather than limited to this application. This document unfortunately does not include any current trip information from the site; therefore, a baseline cannot be currently seen until a formal document has been sent under a planning condition. It would have been more beneficial for surveys to have been undertaken and submitted with the application to give a better insight into the current models split from the site. The Travel Plan includes incentives to increase the mode share of cycling to the site, though this would be difficult given that the college will not see the provision of cycle parking increased. Both walking and cycling only show an increase of mode share of 3% for staff and 0.75% for students from the baseline year into year 1, which is incredibly low given the sites connectivity to active travel infrastructure. Furthermore, given that cycle parking is only being marginally increased it is still not understood how both students and staff are expected to take up cycling to the college in greater numbers ever as there is clearly not enough for current numbers. The travel plan is looking to have a reduction of 8.5% of car use by staff by the first year, it can be assumed that this large success would be done through the removal of the 17 car parking spaces. However, no measures have been identified on how further reduction in use would be sort.	

Stakeholder	Question/Comment	Response
	Overall, LBH Transport Planning accepts some of the content of the document, although the areas that have been highlighted will need to be substantially improved upon the receipt of a new document as part of the S.106 obligation. There will be a Travel Plan Monitoring Fee per year for the first 5 years for a college travel plan this will be covered by way of a S.106 obligation. Servicing and delivery The application does include a draft Service and Delivery Plan. Service and delivery access is currently done via the College's gated vehicle entrance from Town Hall Approach, it is normally used for the delivery of large goods and provides access to staff car parking for 17 vehicles. The college is currently serviced for waste and recycling, with other deliveries associated being with material and equipment for teaching and office supplies. The servicing area is to be retained, though there will be a loss in the 17 car parking spaces. However, this has not led to an increase in the area itself for vehicles, this is because the yard area is to be reduced in size although the developer states there is still enough room for vehicles to manoeuvre internally. 3 skips and 2 compactors are currently used to house the sites waste and recycling, when full they are removed by a vehicle. Current arrangements are to remain as they are presently. The larger vehicle type size ranges from 10.2m 18 tonne to an 8.9m 12 tonne box van, with the smallest being of 8m length. Swept path drawings have been provided showing a large 12m vehicle being able to turn on-plot and leave in a forward gear. Deliveries are to take place outside of the peak. LBH Transport Planning will condition the submission of a Delivery and Servicing and Waste Management Plan. This will need to include details of refuse collections and service trips to the site, this must be submitted and approved before the site is occupied and secured via a pre-occupation planning condition. Construction Logistics Plan A draft Construction Logistics Plan (CLP) has been received as part of the submission. The document covers some of the following: challenges, programme of works, vehicle routing/access, trip generation, and monitoring. Some issues have been identified and	

Stakeholder	Question/Comment	Response
	already raised with the applicant's transport consultants regarding vehicle manoeuvres and routing. The largest vehicle to visit the site would be a 16.5m HGV, it would need to reverse onto the site from Town Hall Approach by driving through the bus gate and then reverse whilst mounting the kerb and then block the CS1 cycle lane to leave in a forward gear from the site. This would increase road safety risk, as it could potentially cause a collision with both pedestrians and cyclists. Furthermore, unless reinforced the kerb, concrete slabs and tarmac would become damaged from such heavy vehicles. There are other concerns around some vehicle routing from supplied swept path drawing of 16.5m HGVs proceeding onto/out of the junctions with Philip Lane/High Road and Philip Lane/Town Hall Approach. This is because vehicles proceed either near to or over hand onto the footway, meaning that these manoeuvres would have to be executed proficiently to prevent harm to pedestrians or other road users. The above would not be in accordance with the published London Plan 2021 Policy T4 Assessing and mitigating transport impacts which states that '<i>development proposals should not increase road danger</i>' and Policy T7 Deliveries, servicing and construction which states '<i>during the construction phase of development, inclusive and safe access for people walking or cycling should be prioritised and maintained at all times</i>'. A more fully detailed draft of a worked-up Construction Logistics Plan will be required for review and approval prior to commencement of any site works. The applicant will need to liaise and discuss intended means of access and servicing the site from the Highway with Haringey Council's Network Management Officers, and the outcomes of these conversations will need to inform the finished CLP. Transport for London's borough Service Delivery Manager for buses should be consulted, as to prevent construction affecting local bus movement on Town Hall Approach. A Road Safety Audit will need to be completed before any CLP construction can begin, as it will inform decision making on the movement of larger 16.5m HGVs. A CLP draft should include the following: • High provision of cycle parking should for workers for phases of construction to promote uptake of cycling to/from the site.	

Stakeholder	Question/Comment	Response
	• Gives the sites excellent connectivity to public transport which is demonstrated through its high PTAL rating, and local parking restrictions no on-site car parking should be provided for workers. • The following times, 08:00-09:00, 15:00-16:00, and 17:00-18:00, will need to be avoided by delivery and construction vehicles as to prevent vehicles from related to the development travelling when the road network is at its busiest because of school drop-off/pick-up times and peak road congestion. • Effort should be made to have a process in place to deal with delivery/construction vehicles that turn up late or announced, as to prevent vehicles waiting on the public highway causing an obstruction or waiting on nearby residential streets. LBH Transport Planning 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 CLP guidance when compiling the document, 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 objections to this proposal subject to the following conditions and S.106 obligations. Conditions <u>1. Delivery and Servicing Plan and Waste Management</u> The applicant shall be required to submit a Delivery and Servicing Plan (DSP) for the local authority's approval. The DSP must be in place prior to occupation of the development. The service and delivery 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	

Stakeholder	Question/Comment	Response
	within 10 metres carrying distances of a refuse truck on a waste collection day. It should demonstrate how the development will include the consolidation of deliveries and enable last mile delivery using cargo bikes. Details should be provided on how deliveries can take place without impacting on the public highway, the document should be produced in line with TfL guidance. The final DSP must be submitted at least 6 months before the site is occupied and must be reviewed annually in line with the travel plan for a period of 3 years unless otherwise agreed by the highway's authority. Reason: To ensure that the development does not prejudice the free flow of traffic or public safety along the neighbouring highway and to comply with the TfL DSP guidance 2020 <u>2. Cycle Parking</u> The applicant will be required to submit plans showing accessible; sheltered, and secure cycle parking for 27 long-stay and 50 short-stay spaces for approval. The quantity must be in line with the London Plan 2021 T5 Cycle and the design must be in line with the London Cycle Design Standard. No Development (including demolition) shall take place on site until the details have been submitted and approved in writing by the Council. REASON: to be in accordance with the published London Plan 2021 Policy T5, and the cycle parking must be in line with the London Cycle Design Standards (LCDS). <u>4. Disabled parking bays</u> The applicant will be required to submit and provide plans showing 1 disabled parking, this must be submitted for approval before any development commences on site. REASON: to ensure the development is in accordance with the published London Plan 2021 T6.5 non-residential disabled. <u>5. Car Parking Management Plan</u>	

Stakeholder	Question/Comment	Response
	The applicant will be required to provide a Car Parking Management Plan which must include details on the allocation and management of the on-site car parking spaces including all accessible car parking spaces and how they are allocated. 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 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 before and after completion. f) The implementation and use of the Construction Logistics and Community Safety (CLOCS) standard. g) The applicant will be required to contact LBH Highways to agree condition on surveys. h) Site logistics layout plan, including parking suspensions, turning movements, and closure of footways. i) Swept path drawings. <u>2. College travel plan</u>	

Stakeholder	Question/Comment	Response
	A college travel plan must be secured by the S.106 agreement and submitted 6months before occupation. 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 college Travel Plan and appoint 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 3 years and must include the following measures: b) Provision of college induction packs containing public transport and cycling/walking information, available bus/rail/tube services, showers. Lockers, map and timetables to all new staff, travel pack to be approved by the Councils transportation planning team. c) The applicant will be required to provide, showers lockers and changing room facilities. d) The developer is required to pay a sum of £3,000 (three thousand pounds) per year per travel plan for monitoring of the travel plan for a period of 3 years. This must be secured by S.106 agreement. e) The first surveys should be completed 6 months post occupation or on 50% occupation whichever is sooner. 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.	
LBH Waste Management	The plans have been reviewed and it is understood that the external area around the proposed building will be reorganised in respect of refuse and recycling facilities. The DAS volume 5 and the Delivery Servicing Management Plan provide comprehensive	A condition is included for a detailed Delivery Servicing

Stakeholder	Question/Comment	Response
	details about the new arrangements. It is noted that some of the existing recycle and waste compactors will be removed and replaced with a new compactor. According to the Delivery Servicing Management Plan, tracking analysis has been undertaken to show that the largest waste/recycling collection vehicle can turn within the new layout to collect the skips/compactors. Veolia will be contacted to assess if the access arrangements meet Haringey's guidelines and if there are concerns, the planning officer will be informed.	Management Plan to be submitted/approved prior to first use of the development.
LBH Environmental Health (Pollution)	Thank you for contacting the Carbon Management Team (Pollution) regarding the above application for the Demolition of the existing gym/lecture theatre block and the erection of a part four/part five-storey building (2,625 square metres GIA) to host a new Construction and Engineering Centre at the College at College Of North East London Tottenham Centre, High Road, Tottenham, London, N15 4RU and I would like to comment as follows: Having considered the relevant applicant submitted information including: Design and Access Statement prepared by AtkinsRealis, dated 1st February 2024; Air Quality Assessment with reference 7689 prepared by Redmore Environmental Ltd., dated 14th February 2024 taking note of section 4 (Baseline), 5 (Construction Phase Assessment), 6 (Operational Phase Assessment), 7 (Air Quality Neutral Assessment); Energy Assessment Report with reference 10379-IRB-01-XX-T-OS-5101 prepared by Introba Consulting Ltd. taking note of the proposal to make use of Air Source Heat Pumps and photovoltaics; Geo-environmental and Geotechnical Assessment with reference 1922791-01(00) prepared by RSK Environment Ltd, dated May 2023 taking note of section 3 (Desk-Based Assessment), 6 (Initial Conceptual Site Model), 7 (Site Investigation Strategy & Methodology), 8 (Site Investigation Factual Findings), 12 (Conclusions and Recommendations), please be advised that we have no objection to the proposed development in respect to air quality and land contamination but the following planning conditions and informative are recommend should planning permission be granted. 1. 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	The recommended conditions and informatives have been added to the draft decision notice.

Stakeholder	Question/Comment	Response
	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. 2. NRMM a. No works shall commence on the site until all plant and machinery to be used at the demolition and construction phases have been submitted to, and approved in writing by, the Local Planning Authority. Evidence is required to meet Stage IIIB of EU Directive 97/68/ EC for both NOx and PM. No works shall be carried out on site until all Non-Road Mobile Machinery (NRMM) and plant to be used on the site of net power between 37kW and 560 kW has been registered at http://nrmm.london/. Proof of registration must be submitted to the Local Planning Authority prior to the commencement of any works on site. b. An inventory of all NRMM must be kept on site during the course of the demolitions, site preparation and construction phases. All machinery should be regularly serviced and service logs kept on site for inspection. Records should be kept on site which details proof of emission limits for all equipment. This documentation should be made available to local authority officers as required until development completion. Reason: To protect local air quality and comply with Policy 7.14 of the London Plan and the GLA NRMM LEZ 3. Demolition/Construction Environmental Management Plans a. Demolition works shall not commence within the development until a Demolition Environmental Management Plan (DEMP) has been submitted to and approved in writing by the local planning authority whilst b. Development shall not commence (other than demolition) until a Construction Environmental Management Plan (CEMP) has been submitted to and approved in writing by the local planning authority. The following applies to both Parts a and b above:	

Stakeholder	Question/Comment	Response
	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	

Stakeholder	Question/Comment	Response
	Emissions Control (2014) and shall include: i. Mitigation measures to manage and minimise demolition/construction dust emissions during works; ii. Details confirming the Plot has been registered at http://nrmm.london; iii. Evidence of Non-Road Mobile Machinery (NRMM) and plant registration shall be available on site in the event of Local Authority Inspection; iv. An inventory of NRMM currently on site (machinery should be regularly serviced, and service logs kept on site, which includes proof of emission limits for equipment for inspection); v. A Dust Risk Assessment for the works; and vi. Lorry Parking, in joint arrangement where appropriate. The development shall be carried out in accordance with the approved details. Additionally, the site or Contractor Company must be registered with the Considerate Constructors Scheme. Proof of registration must be sent to the Local Planning Authority prior to any works being carried out. Reason: To safeguard residential amenity, reduce congestion and mitigate obstruction to the flow of traffic, protect air quality and the amenity of the locality.” Informative: 1. Prior to demolition or any construction work of the existing buildings, an asbestos survey should be carried out to identify the location and type of asbestos containing materials. Any asbestos containing materials must be removed and disposed of in accordance with the correct procedure prior to any demolition or construction works carried out	
LBH Regeneration	CoNEL Application HGY/2024/0464: Placemaking Team Comments 02.05.24 Thank you for contacting the Placemaking Team regarding application no. HGY/2024/0464 – <i>“Demolition of the existing gym/lecture theatre block and the erection of a part four/part five-storey building (2,625 square metres GIA) to host a new Construction and Engineering Centre at the College”.</i>	The comments with regards to the public realm, street frontage and entrance design are noted, but largely are matters for future redevelopment of the site that have not

Stakeholder	Question/Comment	Response
	CoNEL College in the Context of the Wider Seven Sisters Placemaking Vision CoNEL is a key anchor institution within Tottenham Green, serving as a cultural, educational, and civic hub in Tottenham. As part of the emerging Local Plan, there is a vision to enhance the status of Tottenham Green as a ‘Culture Quarter’ by increasing accessibility, delivering new community uses and improving the public realm. Complementing the Local Plan, the Council is currently developing "Shaping Tottenham", a collaboration between Tottenham's communities, the council, and its partners to develop a ten year strategy for Tottenham. This will capitalise on opportunities from the London Borough of Culture '27, Euro '28, and beyond, and, as relevant to this application, aims to: • Activate the High Road with engaging activities in a public realm that is safer and more attractive for community use. • Make the productive economy more accessible to the public, including through improved signage and wayfinding. • Invest in and expand industrial estates and the creative/green economy. • Enhance the connection between education, young people, and employers, improving access to work experience and positive role models. In the context of "Shaping Tottenham," there is strong support for the concept of a new, state-of-the-art facility for vocational courses. There is also backing for the proposal to develop a comprehensive masterplan for the CoNEL site, ensuring its future as an educational and innovation hub. The comments below outline the Placemaking Team's vision for the new Construction and Engineering Centre and how the masterplan could further align with the broader vision for Tottenham Green and Seven Sisters. Street Frontage and Entrance Design The While the college currently has some street presence, the illustrative masterplan presents an opportunity to improve the arrival experience and create a public area where the existing car parking is located. This area has potential to showcase the college's activities and inspire local engagement with young people, while supporting the Culture Quarter's goal of making activities more visible and accessible from the Green.	been addressed within this proposal, which is for a building to the rear of the site. However, a condition is being imposed to require additional cycle parking to be provided that would serve to encourage and facilitate greener travel methods.

Stakeholder	Question/Comment	Response
	Initial improvements could include better signage and lighting at the boundary with the High Road and the Green itself, enhancing visibility of the centre's activities and addressing safety concerns expressed by young people, especially outside of college hours. A Public Realm that Supports Active Travel Given the site's excellent PTAL rating of 6a, and the focus of the Construction and Engineering Centre on promoting green skills, a strong commitment to active travel is recommended. In the context of the illustrative masterplan, the Placemaking Team encourages the applicant to consider whether allocating space in the forecourt for active travel (e.g., through expansive, secure, and well-designed cycling facilities) could reduce the need for parking and encourage greener travel methods. This change could also allow for the expansion of student-oriented facilities and enhancements to the public realm via improved landscaping. Futureproofing the Site and Protecting Educational Uses Building on the emerging approach to 'Shaping Tottenham' which looks to expand opportunities for young people in the borough through increased access to high quality jobs, the Placemaking Team strongly support a review of the proposed approach to the disposal of the Construction and Engineering building for residential uses. The team encourages the applicant to consider the opportunity for the site to remain as an educational facility instead. Under the banner of 'Shaping Tottenham' the Placemaking team would encourage the applicant to work collaboratively with the team on to ensure that land use, design and phasing protects and maximises opportunities for young people through productive uses where possible. Co-Production and Community Wealth Building The development of the site presents a unique opportunity for students to engage with and learn about innovation, design, technology, sustainability, and construction. The applicant is encouraged to involve students in proposals for the design and construction of the new facility as much as possible.	

Stakeholder	Question/Comment	Response
LBH Inclusive Economy Service	Within the borough's Inclusive Economy Framework 'Opportunity Haringey' under the theme of Good Work and Skills, CoNEL are instrumental in our ambition to transform employment and training opportunities for residents in key growth sectors. The net zero transition in particular will create wholesale change across industries and create jobs in Haringey. CoNEL's investment in their Tottenham campus for a modern construction and green skills centre, will be critical in this regard, equipping them for state of the art delivery and cementing their place for years to come in the borough's education, training and economic infrastructure. As well as providing training for residents, they will also work closely with the council and other training providers to upskill local businesses and the residents they employ to be ready for opportunities that the retrofit market will bring. The council also works sub-regionally with CoNEL and partners to strengthen this approach as part of our ambition to become carbon neutral by 2041. In supporting this application and as well as the required employment and skills plan, we would be keen to work closely with CoNEL and their contractors/suppliers to maximise the benefits of local jobs and training on any construction programme, as well as explore the green skills ambitions and circular economy opportunities further."	The support of the Inclusive Economy Service is noted.
EXTERNAL		
Historic England	Historic England provides advice when our engagement can add most value. In this case we are not offering advice. This should not be interpreted as comment on the merits of the application. We suggest that you seek the views of your specialist conservation and archaeological advisers. You may also find it helpful to refer to our published advice at https://historicengland.org.uk/advice/find/ It is not necessary to consult us on this application again, unless there are material changes to the proposals. However, if you would like advice from us, please contact us to explain your request. Please note that this response relates to designated heritage assets only. If the proposals meet the Greater London Archaeological Advisory Service's published consultation criteria	Noted officers have sought the views of their specialist conservation advisers.

Stakeholder	Question/Comment	Response
	we recommend that you seek their view as specialist archaeological adviser to the local planning authority.	
History England (GLAAS)	Having considered the proposals with reference to information held in the Greater London Historic Environment Record and/or made available in connection with this application, I conclude that the proposal is unlikely to have a significant effect on heritage assets of archaeological interest. The planning application lies in an area of archaeological interest (Archaeological Priority Area) identified in the local: (77574) Tottenham Medieval Settlement. Although the proposed development site contains a potential for post-medieval and some prehistoric material, the previous development of the site will likely have resulted in extensive truncation of any below-grounds archaeological assets. No further assessment or conditions are therefore necessary. This response relates solely to archaeological considerations. If necessary, Historic England's Development Advice Team should be consulted separately regarding statutory matters.	Noted officers have sought the views of their specialist conservation advisers.
War memorials Trust	This application affects the setting of the Grade II listed Tottenham war memorial, to which the Trust grant funded conservation and repair works in 2014. The Trust has a limited remit and therefore can only make comments in relation to the war memorial on site and not any wider heritage concerns. Accepting that the original setting has changed significantly since the memorial was first erected, the Trust would not consider the proposed development to adversely affect this listed asset.	Noted.
Transport for London	The College of Haringey, Enfield and North East London (CONEL) directly fronts on the A10 High Road with existing vehicle access points, Tottenham, which forms part of the Transport for London Road Network (TLRN). Delivery/ Service vehicle access to the site is via Town Hall Approach, which is a strategic cycle route (CS1). Town Hall Approach south of the access is bus and cycle only, where red route controls apply. There is a segregated cycle path for north bound cyclists up the access, with shared provision north of the access. There also cycle parking by this access.	During discussions at a meeting held on 18th June 2024, it was accepted by TfL that a Healthy Streets Transport Assessment (TA) including an

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	The site has a Public Transport Accessibility of Level of 6a with 6b on eastern boundary, 6b being the highest possible on a scale of zero to 6b. The nearest London Underground station is Seven Sisters served by the Victoria Line, and served by 8 bus routes, plus two night routes. The application is supported by a number of transport related documents, which I reviewed below, I also consulted colleagues on the application, they may have further comments to make, which I plan to share with you next week. <u>Transport Statement</u> The TS references national guidance with regards to need for a Transport Statement or Transport Assessment, however, TfL guidance on Healthy Streets Transport Assessments is aligned with London Plan strategic transport policy (T1), TfL is open to discuss how its applied, around Active Travel Zone, and also consideration after dark travel, taking account of the Mayor's Night Safety Charter and Safety in Public Space: Women, Girls and Gender. I do not know if CONEL has signed up to the charter, it would be helpful to understand if this has been considered in terms of future access to the site. The TS states no increase in staff or students. The application forms says the existing F1 floor area is 1030 square metres, which is to be demolished, and 2,625 square metres new floor space, this appears to be an uplift. We understand the assumption relates to future application to demolish an existing larger building nearby, if that is to be demolished, how should this be considered given this	assessment of Active Travel Zones would not be necessary given that the proposals will result in no uplift in staff and student numbers at the college and given that LBH accepted that a TS without assessment was acceptable at the pre-application stage. The applicant indicates that the Travel Plan will be updated to include a positive commitment to reviewing after dark travel and for this to align with wider work that the college is undertaking in this regard, including signing up to the Mayor's Night Safety Charter. The applicant technical transport response indicates no electric charging points are proposed.

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	is not part of this application. There is a reduction in car parking of 17 spaces, which TfL welcomes, and increase of cycle parking of 20 spaces. They propose to retain 3 Blue Badge spaces to the front of the college is welcome. Are there any proposals for Electric Vehicle Charging Points on site? The proposal to increase cycle provision from 40 spaces to 60 spaces is welcome by TfL. These should be designed in accord with London Cycle Design Standards (LCDS) and secured by condition. Provision for larger and adaptable bikes should be made or at least allowed for in the existing provision. Useful to understand if there is any data on cycle usage and what growth potential has been identified. Changing facilities and lockers are welcome, are they sufficient for the college as a whole, given this associated with the college gym, how is this managed? It says deliveries remain as currently, with smaller vehicles using the loop road, and larger reversing in from the Town Hall Approach Road, this is assumed, it would be useful to what actual happens, as this appears to be less than ideal from a road safety perspective on a strategic cycle route. How does this site accommodate cargo bikes, if not now, maybe worth considering in the future, TfL published its Cargo Bike Action Plan last years: https://content.tfl.gov.uk/tfl-cargo-bike-action-plan-2023-acc.pdf I believe Haringey local policies would align with the strategic approach to transport set out in the	However, the college has a wider strategy that is being reviewed and are committed to accommodating EV demand. The applicant has confirmed that existing car parking and cycle parking in the site is for the use of the college site as a whole and not specific to any particular building / facility. This would remain the case for the redevelopment scheme albeit for the reduced level of on-site car parking and increased level of cycle parking provision. There will be a requirement for a travel plan to be secured by a S.106 agreement, which will work towards securing a commitment to

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	London Plan, in general these proposals seem to align with these objectives, reduced car parking and increase cycle parking provision. The national policy test of severe impact needs to be considered in London context, where we need mode shift to support good growth objectives of the London Plan, without that mode shift there would be severe impact. In this case, there are opportunities to improve access by active modes and review servicing and delivery arrangements in line with current best practice. <u>Travel Plan</u> The Travel Plan refers to 200 full time equivalent staff and 2,345 full time equivalent students. Without data about current travel behaviour its difficult to judge if the objectives and targets are achievable or calibrated in a reasonable manner. This might some to revisit at a later time. The Haringey action plan https://www.haringey.gov.uk/sites/haringeygovuk/files/adopted_walking_and_cycling_action_plan_2022.pdf says 3% of all trips are by bike, TfL may expect higher bike share for a college on CS1, though not weakness in the quality of provision identified in action plan. This suggests even with the additional cycle parking more cycle parking should be planned if not part of this planning application, at least as part of the Travel Plan, particularly as the site is on CS1, and through wider engagement between CONEL, Haringey and TfL. Given changes to car parking start at the construction stage, this suggests the Travel Plan should prepared prior to demolition. <u>Delivery and Servicing Management Plan</u> TRICS data has been used to predict future delivery and servicing trips to site, whilst elsewhere,	increasing cycle parking provision across the college site. A detailed CLP shall be required by conditioned, subject to a monitoring fee secured by a S.106 contribution.

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	there is reference to current operations. Why not survey existing operations on site to establish a baseline. The aim to avoid peaks is welcome, recommend this is managed through a booking system. TfL would recommend only suppliers with Silver or Gold membership of Fleet Operators Recognition Scheme (FORS), given the interface with CS1, also compliance with Direct Vision Standards. This can be monitored through the booking system, compliance would depend on colleges relationship with suppliers. As stated above, large vehicle reversing on Town Hall Approach Road or on site, represents a road safety hazard that should be eliminated. <u>Outline Construction Logistics Plan</u> TfL colleagues may have further comments on this, as the proposed access arrangement would need TfL agreement, and changes to traffic orders, or dispensation from TfL. Shared access between the demolition and subsequent construction contractor with continue operational use, will make enforcement and management difficult. Lack of information on how site delivery works currently doesn't help build confidence. Usually, contractors are able to manage operations through qualified traffic marshals, where there is identified to the public, whether they could also manage other deliveries to site would depend on the colleges approach. The proposal to drive vehicles into the bus and cycle only area and reverse into site appears to be safety risk. If this can be avoided that would a good idea. If its unavoidable, TfL would recommend a Road Safety Audit is prepared, for planning a Stage 1 RSA before the application is approved, the	

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	auditors would need to acceptable to Haringey and TfL.	
Thames Water	Waste Comments We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, testing and site remediation. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. Should the Local Planning Authority be minded to approve the planning application, Thames Water would like the following informative attached to the planning permission: "A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 020 3577 9483 or by emailing trade.effluent@thameswater.co.uk . Application forms should be completed on line via www.thameswater.co.uk. Please refer to the Wholesale; Business customers; Groundwater discharges section. The proposed development is located within 15 metres of our underground waste water assets and as such we would like the following informative attached to any approval granted. "The proposed development is located within 15 metres of Thames Waters underground assets and 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 Phone: 0800 009 3921 (Monday to Friday,	The comments from Thames Water are noted. Standard informatives as recommended have been added to the draft decision notice.

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	8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB With regard to SURFACE WATER drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water we would have no objection. Management of surface water from new developments should follow Policy SI 13 Sustainable drainage of the London Plan 2021. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. Should you require further information please refer to our website. https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes Thames Water would advise that with regard to WASTE WATER NETWORK and SEWAGE TREATMENT WORKS infrastructure capacity, we would not have any objection to the above planning application, based on the information provided. A Trade Effluent Consent will be required for any Effluent discharge other than a 'Domestic Discharge'. Any discharge without this consent is illegal and may result in prosecution. (Domestic usage for example includes - toilets, showers, washbasins, baths, private swimming pools and canteens). Typical Trade Effluent processes include: - Laundrette/Laundry, PCB manufacture, commercial swimming pools, photographic/printing, food preparation, abattoir, farm wastes, vehicle washing, metal plating/finishing, cattle market wash down, chemical manufacture, treated cooling water and any other process which produces contaminated water. Pre-treatment, separate metering, sampling access etc may be required before the Company can give its consent. Applications should be made at https://wholesale.thameswater.co.uk/Wholesale-services/Business-customers/Trade-effluent or alternatively to Waste Water Quality, Crossness STW, Belvedere Road, Abbeywood, London. SE2 9AQ. Telephone: 020 3577 9200. Water Comments If you are planning on using mains water for construction purposes, it's important you let Thames Water know before you start using it, to avoid potential fines for improper usage. More information and how to apply can be found online at thameswater.co.uk/buildingwater.	

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	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 On the basis of information provided, Thames Water would advise that with regard to water network and water treatment infrastructure capacity, we would not have any objection to the above planning application. Thames Water recommends the following informative be attached to this planning permission. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow 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.	
National Grid Asset Protection Team	Regarding planning application HGY/2024/0464, there are no National Gas Transmission assets affected in this area.	Noted.
Met Police	<u>Section 1 - Introduction:</u> Thank you for allowing us to comment on the above planning proposal. With reference to the above application we have had an opportunity to examine the details submitted and would like to offer the following comments, observations and recommendations. These are based on relevant information to this site (Please see Appendices), including my knowledge and experience as a Designing Out Crime Officer and as a Police Officer. It is in our professional opinion that crime prevention and community safety are material considerations because of the mixed use, complex design, layout and the sensitive location of the development. To ensure the delivery of a safer development in line with L.B. Haringey	The applicant has indicated in their Planning Statement that as this is a building within the college campus and robust security measures are already in place, they do not intend to seek to achieve Secured by Design Accreditation.

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	DMM4 and DMM5 (See Appendix), we have highlighted some of the main comments we have in relation to Crime Prevention (Appendices 1). We have met with the original project Architects to discuss Crime Prevention and Secured by Design at pre-application stage to review our concerns around the design and layout of the development and they have stated that they do not wish to participate in Secured by Design. This is a concern as there is no mention of crime prevention, security measures or Secured by Design in the Design and Access Statement, referencing design out crime or crime prevention. Metropolitan Police Service Designing out Crime Group do not provide a consultation service solely for the purposes of meeting the BREEAM Security Needs Assessment. However, the Metropolitan Police Service Designing out Crime Group can assist the developer to achieve the relevant BREEAM credit for Safety and Security via an application for Secured by Design accreditation (SBD). A signed and dated SBD Commercial application form should be emailed to the above email address. Please note full submissions should be accompanied with full product details – to include all door and window specifications etc. 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 omission of any security recommendations we have recommended the attaching of suitably worded conditions and an informative. The comments made can easily be mitigated early if the Architects ensure the ongoing dialogue with our department continues throughout the design and build process. This can be achieved by the below Secured by Design conditions being applied (Section 2). If the Conditions are applied, we request the completion of the relevant SBD application forms at the earliest opportunity. The project has the potential to achieve a Secured by Design Accreditation if advice given is adhered to. <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>	An informative has been added to the conditions/informative list that encourages the applicant to seek accreditation.

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	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. 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. <u>Informative:</u> 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 <u>Section 3 - Conclusion:</u> We would ask that our department's interest in this planning application is noted and that we are advised of the final Decision Notice, with attention drawn to any changes within the development and subsequent Condition that has been implemented with crime prevention, security and community safety in mind. Should the Planning Authority require clarification of any of the recommendations/comments given in the appendices please do not hesitate to contact us at the above office.	