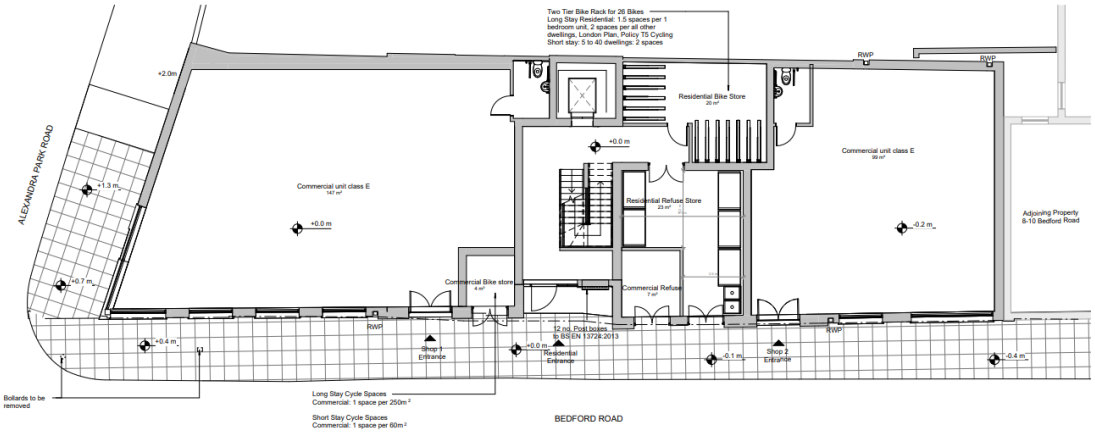
APPENDIX 2 – PLANS AND IMAGES

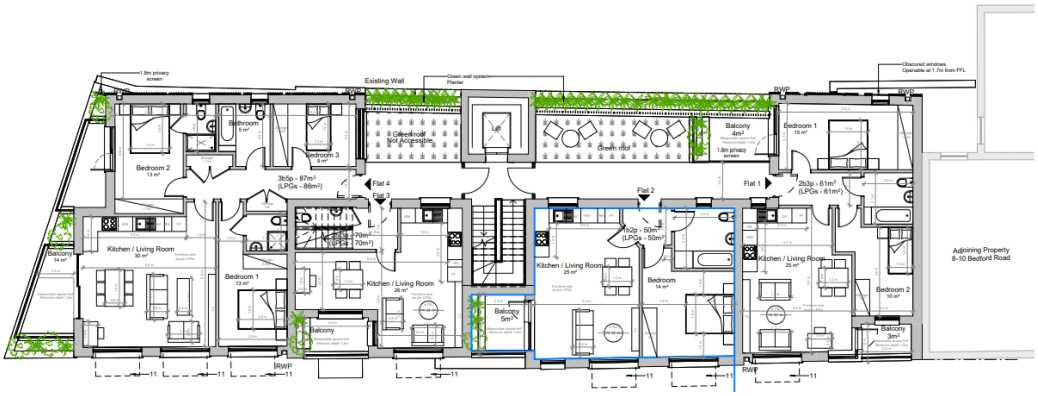
Site location plan

Birds eye view

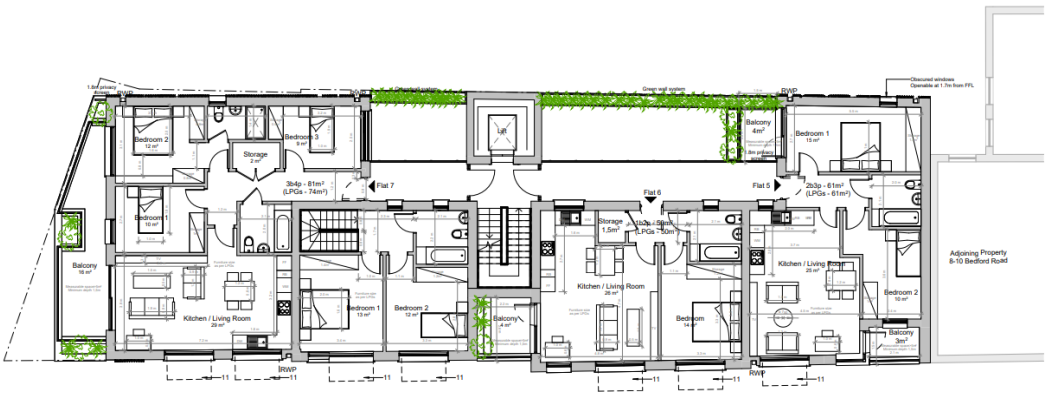
Site photos



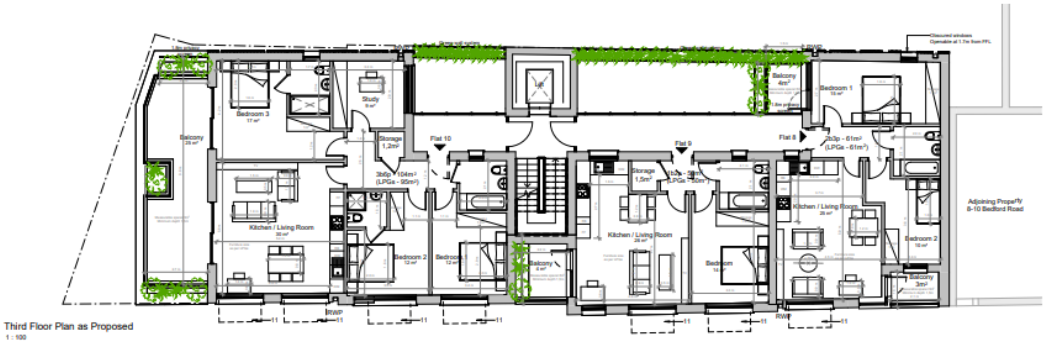
Proposed ground floor plan

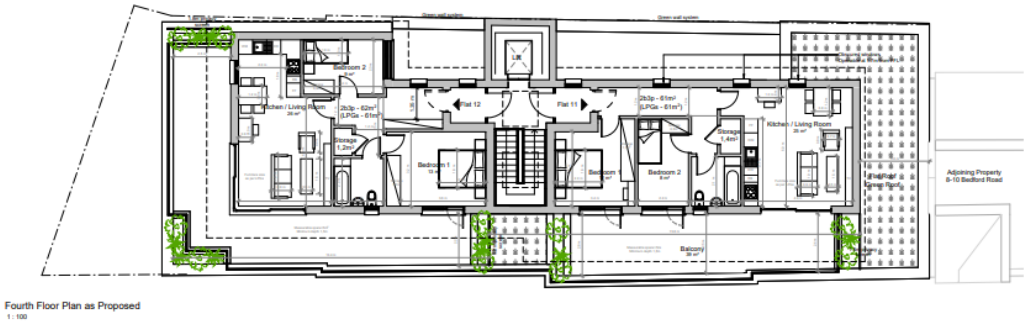


Proposed first floor plan

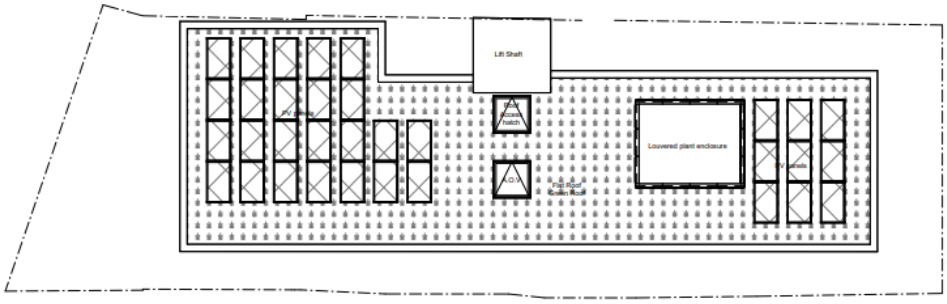


Proposed second floor plan





Proposed third and fourth floor plan



Proposed roof plan

Proposed elevations

View A

View B

View A - Zoom

View_Top Floor Flat

CGI Views

Bird view C

Bird view D

Rear View_Alexandra Park Road

Residential Entrance

CGI Views

APPENDIX 3 – CONSULTATION REPONSES – INTERNAL AND EXTERNAL

Stakeholder	Question/Comment	Response
Design	Context 1. The site is located to the east of Alexandra Palace Park, at the junction of Bedford Road and Alexandra Park Road, and in proximity to Alexandra Palace train station. Positioned within a predominantly residential area, the site sits adjacent to the local high street along Palace Gates Road and has access to a variety of public amenities. These include woodlands, parks, and playing fields which are all within walking distance. 2. This brownfield windfall site is currently used by a car repair business. The site is partially occupied by a two-storey building with a glazed ground-floor frontage and an area of hardstanding used for car parking along Bedford Road. Due to the sloping topography, the building appears as a single-storey structure when viewed from Alexandra Park Road. Architecturally, the building is of limited merit. 3. The site benefits from high visibility, being located near one of the main entrances to Alexandra Park. It is visible from three key directions, including the pedestrian and vehicular bridges that cross the railway lines, as well as from the conservation area situated beyond the tracks. Additionally, the rear of the site is visible from the elevated section of Alexandra Park Road, where the terrain slopes downward toward the property. 4. The surrounding urban fabric is typologically diverse, with no single architectural style dominating the area. The neighbourhood features a mix of Interwar domestic architecture, Edwardian homes, and contemporary developments. To the north of the site stands a four-storey mansion block, while to the south, along Bedford Road, is a row of two-storey Edwardian houses. Immediately west of the site, fronting Alexandra Park Road, is a car park and a two-storey purpose-built block of flats. Further west, the area is primarily composed of two-storey semi-detached houses.	Comments noted Conditions included Officers met with the applicant to discuss revisions and to concentrate on the detailed design of the development.

	Height, Form, Bulk, Massing & Layout 5. The proposal comprises a five-storey residential mansion block (Use Class C3) with a recessed top floor and two commercial units at ground level (Use Class E). These commercial units have flexible layouts to accommodate a variety of uses and feature generous shopfronts designed to activate the street frontage. The mixed-use scheme therefore transforms an underutilised local town centre site, integrating it more effectively with its surrounding context. The design has evolved through multiple iterations, incorporating feedback from both the Quality Review Panel (QRP) and planning officers, resulting in improvements to massing, architectural expression, and detailing. 6. The proposed building is approximately one storey taller than the adjacent properties at 8–10 Bedford Road (to the north) and 357 Alexandra Park Road (to the east). However, the height is considered appropriate given the site's high accessibility and proximity to local amenities and services. Based on the ambitions of Haringey's local plan - new developments may rise proportionately above the prevailing heights to facilitate housing delivery in the borough. Additionally, the top floor is recessed by a minimum of 2.2 metres from the north, east, and south elevations and is clad in grey powder-coated aluminium, which scale down its bulk and appearance. 7. The building's height is not considered intrusive, even in long-range views from Bridge Road and Buckingham Road across the railway line as the streetscape along Bedford Road gradually and consistently steps up from the corner of Bedford Road and Palace Gates Road. Reasonably reflecting the rising land along the street. This gradual increase in height is exhibited by 8-10 Bedford Road over 7 Bedford Road and by 7 Bedford Road over its neighbour to its north. In this context, the proposed one-storey increase over 8–10 Bedford Road is consistent with the established rhythm and scale of the street. 8. Along Bedford Road, the proposed footprint aligns with the building line of the adjacent property to the north, completing the urban block. On Alexandra Park Road, the footprint extends to the site boundary, diverging from the prevailing 10-metre setback. This is however, considered an appropriate and deliberate response to the site's corner location, as it allows the building to assert its presence and contribute positively to the streetscape 9. Further, the southern corner of the building, at the junction of Bedford Road and Alexandra Park Road is articulated through a series of stepped-back balconies. These cascading balconies provide a visual transition and help to mediate from the level elevation along Bedford Road to a more dynamic elevation	

	on Alexandra Park Road which is primarily a residential street with terraced housing. Overall, the proposed height, form, bulk, massing and layout conforms well to the established character, and acts as a highly compatible neighbour to adjoining sites. Elevational Composition, Fenestration and Materiality 10. The main elevational composition consideration is with the Bedford Road and Alexandra Park Road Street frontage, as is expected from such a frontage-oriented development. The Bedford Road frontage is articulated into four vertical bays, following the established rhythm and scale of the neighbouring buildings. Proposed to be built in red brick, the bays are subtly differentiated through minor tugs of the building line and by varying the mortar pointing. Window and balcony sizes remain consistent across all levels and façades, reflecting the contemporary layouts and uniform residential hierarchy of the proposal. The elevation design has been significantly refined in response to the QRP's feedback, particularly through the simplification of the material palette. 11. A shopfront facia band runs along the Bedford Road frontage, visually separating the base from the upper levels and echoing the composition pattern of the adjoining properties to the north. The bottom of the proposed facia aligns with that of 8-10 Bedford Road, while the top aligns with the existing cornice. An aluminium canopy projects beyond the shop front facia, highlighting the residential entrance and the warm materials, planters and integrated lighting, clearly distinguish it from the other access ways. Store risers reinforce the building's base, yet level access and permeability are maintained in residential, commercial and service areas. As is practice the final shopfront details and levels will be secured through planning conditions to ensure responsiveness to context. 12. Passive solar protection is provided on the east elevation through horizontal aluminium brise-soleils, mitigating overheating. The south elevation benefits from the stepped form factor of the architecture. 13. Whilst the rear of the block is visible, especially from the slope along Alexandra Park Road, the main driver in the composition of the rear elevation is its impact on the privacy of the neighbouring plot. It therefore has expansive blank walls, and projecting brick headers have been incorporated, into its design to add visual interest and texture. The west elevation is framed by residential units and features a centrally located lift core. A recessed light well with communal access decks and small bathroom and bedroom window openings. The light well is screened to the west by a green wall, which also serves as a privacy barrier.	

	14. Outdoor amenity space is provided through a variety of balcony types: inset balconies on the east façade, cascading balconies on the south, and projecting balconies on the west. Along the east and south façades, balcony parapets are composed of short brick walls topped with metal balustrades. These brick elements conceal drainage and soffit services while maintaining a minimal profile. The metal balustrades above provide openness and visual relief. Balconies on the west are equipped with 1.8m high privacy screens on both sides to prevent overlooking and ensure resident privacy. 15. The material palette is brick-led, carefully selected to harmonize with the surrounding context and reflect the character of the area. The façades primarily feature red brickwork, complemented by grey powder-coated aluminium windows and doors. While the specific brick type will be confirmed via condition, the proposed approach is considered appropriate and likely to be visually appealing. Metalwork is used extensively across doors, window frames, shopfront fascias, balustrades, and handrails, all in grey. Additionally, obscured glass privacy screens will be installed between flats and balconies to maintain privacy for future residents. Requested Conditions and Informatives 16. Design refinements were requested at QRP, and more generally the feedback was constructive. Although the QRP has asked for a further review we feel confident that it was not be needed. 17. Notwithstanding the overall design quality of this proposal, a small number of conditions and/or informatives are requested, to safeguard design quality, make up for shortcomings in the application documents and allow the full potential of the site and its neighbours to contribute to the Council's Placemaking Objectives: • Entrances – The residential entrance design should be detailed further with considerations for materiality and texture in the external and internal spaces as they will be experienced every day at proximity. The details for the residential, commercial and service entrances must be conditioned. • Landscaping - to be detailed in drawings submitted for condition (otherwise in accordance with standard landscaping conditions). • Green Wall – Pending the appointment of a landscape architect we must condition the Design, Installation, Maintenance, Security and Fire Risk assessment	

	• Green Roofs – The green roofs on the first, fourth and roof level improve the site's biodiversity, air quality and generate energy through PV panels. However, pending the appointment of a landscape architect the Design, Installation and Maintenance of the proposed green roofs will have to be conditioned. • Balconies - The cascading southern balconies have green parapets which maybe fitted with built in or clip on planter boxes. In either case we must request the detailed drawings of the balconies showing the drainage and soffit details to prevent faulty design which may leave water marks on the facade. We could perhaps request a mock-up should we be not entirely convinced by the drawings. Similarly, the details showing the privacy screens, balustrade and finishes for the inset and projecting balconies should be conditioned. • Materials – samples of brick work including mortar, pointing and parapet, decorative brickwork, sample of setback material at roof level and parapet, window and window frame, soffit, balustrades, external rainwater pipes and goods, sun shading elements. • Levels – level access to the commercial units and residential entrance. Shopfront of the new build should align with the shop front of the adjoining building to the north. Also, the brick parapet of the new structure should be level with the ridge line of the adjoining building to the north. • Shop Front Design – Detailed design of shopfront given its flexible Class E use and not finalised at the time of application. Also, all the standard shopfront advertising contents. • Detailed window, incorporating openings, ventilation, fall prevention requirements, to be designed and coordinated to maintain an elegant overall elevational appearance with the designed proportions.	
Conservation	13 Bedford Road lies to the east of the Alexandra Palace, the iconic GII Listed Building (LB) which lies within a Conservation Area (CA) and is a GII registered park and garden (RPG). Alexandra Palace and Park is a unique surviving example of the Victorian concept of a 'people's palace' based on emulating the original 'Crystal Palace' erected for the Great Exhibition but in north London. Despite some inevitable changes since the Palace first opened in 1873, the relationship between the Palace and the Park remains essentially unchanged from Victorian times, the Palace stands on a natural plateau at the highest part of the site with panoramic views over London. The Palace building is the focal point of the park, dominating local	Comments noted

	and longer distance views when seen from the south and east. The site's additional historic importance derives from being the location of the world's first regular television broadcasts starting in 1936. The transmitter mast added to the south-east tower still dominates views of the Palace, and is a prominent landmark on London's skyline. The Palace and Park jointly share considerable social and cultural significance, and the park and palace remains a significant visitor attraction receiving over 1 million visitors a year and has a high communal value. The development site lies along the main entrance to the park and forms part of its setting. There is some, albeit limited, intervisibility with the park entrance with the development site but more importantly the road from the train station and railway crossing form an important part of the experience of entering Alexandra Palace for a significant number of visitors. The street trees and green space adjacent to the train line give an impression of verdancy along this main route into the park, which is considered to be beneficial to the setting's contribution to the significance of the CA, RPG & LB, extending the greenery of the park down own of its main entrances, softening the transition. However, given the location of the site, as part of the wider streetscene into the park, the LB, RPG and CAs' sensitivity to change in the development site's location is low. The existing site does not contribute to the verdancy of Bedford Road and only has a negligible impact on the setting of the heritage assets. Whilst the higher built form would reduce the visibility of the street tree(s) on Alexandra Park Road from Bedford Road, it would not reduce the overall impression of verdancy along Bedford Road . Accordingly the development of the site as proposed would have a neutral impact on the significance of the LB, CA and the RPG and would be supported by Conservation.	
Transport	**Transportation Planning Comments** **HGY/2023/2584, 13 Bedford Road, Wood Green, London, N22 7AU** **Date:** 31/01/2025 **Proposal:** Demolition of the existing building and the erection of a new mixed-use development up to five storeys high with commercial uses (Use Class E) at ground level, 12no. self-contained flats (Use Class C3) to upper levels and plant room at basement level. Provision of cycle parking, refuse, recycling and storage. Lift overrun, plant enclosure and pv panels at roof level **Description**	Observation s have been taken into account. The Recommend legal agreement clauses and conditions will be included in line with the planning obligations SPD

	An application has been received seeking planning permission to demolish the existing building and erect a five-storey building with two commercial units (Use Class E) on the ground floor and 12 residential units (Use Class C3). Provision will be made for cycle parking, refuse, recycling and storage. The development currently has two vehicle crossovers and some parking that as part of this proposal will not be retained. The site is currently used as a MOT test centre and garage, it further appears that other services such as car cleaning has been added to the sites services by the current occupiers adding to the overall trips generated by it. The existing commercial use has an existing floorspace of 400 sqm. The commercial floor space will be provided over two units located on the ground floor. Provision would be made for 23 long-stay and 2 short-stay cycle spaces for the residential units. The commercial units would have access to 1 long-stay and 1 short-stay cycle space. No provision would be made for on-site disabled bays, as the entirety of the land is being built on for this development. The proposal site has a PTAL rating of 5 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 site is located within the Alexandra Palace CPZ which restricts parking to permit holders Monday to Friday 12:00 – 14:00. Though, nearby to the site there are residential streets which do not have any on-street parking controls. The proposal site fronts onto Bedford Road, which is an adopted road and has a speed limit of 20mph and the carriageway has a width of around 10m without parking bays and this decreases to 6m with on-street parking bays. The development is located near to Wood Green Town Centre providing future residents with convenient access to shops, services, and transport links. The nearest station to the site is Alexandra Palace National Rail Station which is located opposite to the site. Wood Green Underground Station is only around a 13min walk and a 6min bike ride. Residents will be well connected to local bus services as the site is served by the W3 which is a high frequency bus route which goes west to east in the borough. Additionally, bus stops are on both side of the road in close proximity to the site. Unit mix Proposed: 3 x 1 bedroom, 6 x 2 bedroom and 3 x 3 bedroom dwellings. Commercial floorspace: Proposed: 251 sqm. Trip generation Trip information has been forecasted using sites from the TRICS database, these sites have not been given within the Transport Statement therefore LBH Transport Planning are unable to verify their suitability for assessing trip generation for this proposal. Furthermore, for the residential use person trips have only been	

	provided instead of the modal split for transport modes, which gives an insight into the everyday usage transport generation from the development. Trip information for the commercial existing usage has been given, it indicates the current site generates 76 two-way a day and 10 two movements an hour. Overall, this will be eliminated given that the site has come forward as a car free development consequently improving highway safety and the need for manoeuvres in/out of the site. No trip information has been given for the proposed commercial usage as it is felt this would be insignificant given the overall floorspace. However, trip information needs to be fully provided for all uses given that a full assessment needs to be undertaken for the development proposal as a whole. The residential element is only predicted to generate 89 trip over the course of a day, as no person trip generation has been provided for the current site is unknown whether this is an increase or decrease in the overall trips that will be generated by the new development. Overall, LBH Transport Planning finds he analysis to be underwhelming given it does not offer a fully comprehensive picture of overall trip generation. Car parking Planning policy requires that applications for planning permission be determined in accordance with the development plan unless material considerations indicate otherwise. The published London Plan 2021 Policy T6.1 Residential Parking requires that development proposals must comply with the relevant parking standards. For a development of this type, a 3 x 1 bedroom, 6 x 2 bedroom and 3 x 3 bedroom dwellings with a PTAL rating of 5. Maximum parking standards apply which limits the number of car parking spaces that can be provided for a development of this nature which has an excellent PTAL. Given the PTAL of the site and its proximity to public transport links the development will be designated as car free/car capped to be in accordance with Haringey's Development Management DPD, Policy DM32 which states the council will support proposals for new developments with limited or no on-site parking, where: • There are alternative and accessible means of transport available. • Public transport accessibility is at least 4 as defined in the Public Transport Accessibility Index. • A Controlled Parking Zone (CPZ) exists or will be provided prior to the occupation of the development. • Parking is provided for wheelchair accessible units. The published London Plan 2021 T6.1 Residential Parking states that disabled person's parking should be provided for new residential developments delivering 10 or more units. As a minimum 3% of dwellings must have at least 1 designated disabled persons parking bay from the outset. This Policy further requires that new developments be able to demonstrate as part of a Parking Design and Management Plan, how an additional	

	7% of dwellings could be provided with 1 designated disabled person's parking space per dwelling in future upon request as soon as the existing provision is insufficient. However, the developer has stated that they will not be providing any disabled bay parking as part the development as it will not have an accessible unit and additionally because there are already 3 pre-existing bays on-street. Consequently, all new developments that are providing ten or more units should be providing a disabled from the onset and not relying upon existing infrastructure. Therefore, this development is not in accordance with the London Plan 2021 Policy T6.1 Residential Parking and DM32 5.8 which states that '*Appropriately located on-site disabled parking will be required with at least one on or off-site disabled parking space for each car-free development'.* As part of our ongoing effort to ensure that this policy can be complied with and applied effectively throughout the borough LBH Transport Planning will require the developer/applicant to enter into a s278 agreement secured via way of an obligation to provide a disabled bay on-street outside of the development on Bedford Road where there are currently single double yellow lines. The site would include workspace/commercial floorspace with an area of 231 sqm, though the number of potential employees is not known. To be in accordance with the published London Plan 2021 Policy T6.5 Non-residential disabled person parking, which states that '*all proposals should include an appropriate amount of Blue Badge parking, providing at least one space even if no general parking is provided'.* Consequently, given the relatively small size of both the commercial units and its possible uses it is felt in this instance that they would not generate enough demand to justify the provision of a dedicated disabled bay. It should be noted that any member of the public with a blue badge can make use of the 3 general disabled bays already located on Bedford Road. **Future parking demands** An initial parking stress survey was conducted in July of 2023, which utilised the Lambeth Methodology covering an area of 200m, and utilised 6m vehicle lengths. Consequently, given the installation of a commercial unit a 500m area would have been keeping with guidance. Surveys were conducted over two nights and a survey during the day over a 12-hour period from 07:00-19:00. The survey conducted during the day demonstrated parking stress to be between 55% to 67%, with the higher levels recorded being within the AM peak. The night surveys demonstrated parking levels to be around 72% for each day. In all, the above levels show that there is sufficient on-street capacity to accommodate an increase from the development even though resident will be unable to gain a parking permit. An assessment was undertaken to understand the effects of the development to on-street demand, with the proposal being implemented parking would only rise to 78%. It should be noted by LBH Transport Planning that the area of the surveys does not cover	

	streets which are a short walk from the site and are a not presently covered by a CPZ or have any sort of parking restrictions. The published London Plan 2021 Policy T2 Healthy Streets states that *'development proposals should reduce the dominance of vehicles on London's streets whether stationary or moving* ', and DM32 which states that development will have limited or no on-site parking where '*a Controlled Parking Zone (CPZ) exists or will be provided prior to the occupation of the development.* To be in accordance with these policies LBH Transport Planning will therefore be seeking a contribution towards parking management measures to ensure that those areas outside of the control parking zone do not suffer from any displacement in parking demand generated by the proposal. Cycle parking The sites total proposed cycle parking for both elements of the site were assessed against the published London Plan 2021 Policy T5 Cycle parking standards for compliance. Policy T5 Cycle requires that developments *'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.* The residential use proposes to make provision for 23 long-stay and 2 short-stay, the commercial 1 long-stay and 1 short-stay. All these numbers are in accordance with policy. The location and some details on the design of the cycle parking has been given. The residential long stay would be located within one large bike store that will solely utilise two-tier racks. From submitted information it would appear that the aisle width of the two-tier stacker has a length of 1550mm which is not in accordance with the LCDS which has a minimum aisle width of 2500mm to allow for a bike to be turned around fully, although this should be ideally increased to 3500mm where racks are being provided on either side. The proposal does not make use of enlarge cycle parking spaces for either adopted bikes or larger cycles, at least 5% of all spaces should be allowed to accommodate them. the commercial long-stay parking will use semi-vertical bike design, again these may not be fully accessible to everyone as the bike will need to be fully lifted by the user to put into place. Furthermore, there is issue with the short-stay being provided within the long-stay parking for both commercial and residential stores. Separations should be given to both types of cycle parking as to prevent visitors or members from having access to all the bikes. The short-stay cycle must be provided outside of the building but within the curtilage of the site as by definition the long-stay must be secure, and visitors should not be able to gain entry to the bike stores. These spaces would need to be provided via two Sheffield stands. Details relating to the bike store will be secured by a pre-commencement planning condition requiring the applicant to submit details and plans 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. Highways works. Some highway works have been proposed as part this proposal, that include the possibility of extending the residential bays to include a disabled bay to be provided as part of this site. As the sites use is being changed both the access will become redundant meaning the footway will need to be reinstated at both locations. Furthermore, the footway around the entire site will need improving given the increase in active travel from the site and its current deterioration. In a growing effort to increase the usage of sustainable travel within the borough the council will seek to provide a cycle hanger and an EV charging bay. LBH Transport Planning would require a stage 1 and 2 Road Safety Audit to be completed during the design stage of any potential S.278 works. These works would be subject to further detailed design and approval and will have to be secured as part of a S.278 agreement between the Council and applicant. Car clubs There are no nearby car clubs in the vicinity of the development location. Given the scale of this proposal which is for 12 residential dwellings and two commercial units. To ensure that the site is being sufficiently supported to maximise its potential to increase uses of sustainable transport and deter the use of the private car usage the developer will be required to work with a car club operator to provide a new car club bay on-street within the vicinity of the development which residents can make use of. Additionally, this will assist with reducing the rate of car ownership by residents of this development and help to offset any potential future car parking demands on local residential streets when the CPZ is not in operation as demonstrated by the parking survey there is not sufficient on-street capacity to absorb any demand. The applicant will also be required to provide 2 years of car club membership for each residential unit, along with £100 driving credit for each resident this will be secured via S.106 obligation. Full details on the car club provision must be submitted to the local authority for approval at least 6 months before the development is occupied as part of the travel plan. Access Given the size of this proposal an Active Travel Zone (ATZ) is not needed to fully assess the main walking routes to/from the site to key local destinations for residents. All pedestrian accesses into the building will be from the footway including for the commercial units. It should be noted from the proposed floor plans that the doors for the bin stores open onto the footway rather than inwards. This is not acceptable as it as doors	

	opening onto the footway can cause accidents with pedestrians passing by. Therefore, LBH Transport Planning will require that all doors are redesigned to open inwards. **Service and delivery.** The submission does not include a draft service and delivery plan as part of the application. Although, some information has been received on where deliveries are expected to take place and some delivery trip generation. Delivery vehicles are proposed to use the on-street kerbside whilst making deliveries to the site, they will need to utilise the existing double yellow lines that only allow for loading/unloading to take place for a limited amount of time. No information has been proposed where refuse vehicles would wait whilst making collections from the refuse stores. Though, a 10.2m refuse vehicle should be able to effectively use similar practices as deliveries vehicles for short periods of times whilst the council operatives retrieve bins from the stores. With regards to trip generation the sites are predicted to generate 12 two-way trips for both the commercial and residential elements of the proposal. In terms of impact to the road network this is not considered to be significant and should not have any significant impact on the highways network. Any issues can be addressed via the submission of a service and delivery plan to manage deliveries accessing the site and to limit the number of trips to the site to manage the impact on the highway network. **Travel Plan** A draft Travel Plan has been received that covers both commercial and residential elements of the site. Method of travel to work from the census has been used to determine the mode split, although it is unknown what year this data has been derived from given that there are clear variances with the 2011 and 2021 censuses. There is an aspiration to increase the uses of active travel by 10% by year 5, though it has not been stated how this will be practically done given the high increase mentioned. Overall, LBH Transport Planning finds the currently drafted travel plan to be lacking in effective detail for measures and coverage of the proposal's entire uses. Therefore, a Travel Plan Monitoring Fee per year for the first 5 years will be sought separately for the commercial and residential uses of the site. Additionally separate travel plans will need to be submitted for each use. The above will be secured and covered as part of a S.106 obligation. **Construction and logistics** A draft Construction Logistics Plan has been developed and submitted as part of the application. It sets out some of the basic principles of how the development will be built including: programme of works, vehicle routing/access, trip generation, monitoring, and existing site conditions, and demolition works. However, no significant detail is provided within these sections. Some information has been presented on the vehicle types	

	to be used during the works, the largest vehicles is anticipated to be a 7.5t rigid lorry and the smallest vehicle such as smaller transit vans. The routing information that has been presented demonstrates vehicles either travelling from either Buckingham Road or via Palace Gates Road through from Alexandra Park Road. Vehicles associated with construction activities for this site should not be routed via Palace Gates Road or from Alexandra Park Road given that they are residential street with a narrow carriageway which already see high levels of traffic during the peaks. Alternative routing will have to be agreed as part of the revised CLP which must be secured via a S.106 obligation. A staff construction travel plan will need to be created, effective monitoring is needed to ensure that no worker is travelling by car to the site and parking locally given. Any parking restrictions or closure of the footways/suspensions of parking bays if required will need licenses that the developer/applicant will need to apply from the council and will need agreement on how these will be undertaken by the developer. Finally, before construction can begin a general highway survey will need to be carried at to ascertain the condition of the footway and highway and to determine if vehicle accesses will need to be reinforced. Another survey after works has been completed will need to be conducted to determine if the condition of the highway gas deteriorated during construction. A 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 and Transport Planning teams. The outcomes of these conversations will need to inform the finished CLP. A CLP should include the following: • High provision of cycle parking for workers for all phases of construction to promote uptake of cycling to/from the site. • Givens the sites excellent connectivity to public transport which is demonstrated through its close proximity to public transport, 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 dop-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 given the sites location.	

	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 site's construction activities. **Recommendation** There are no highway objections to this proposal subject to the following conditions, S.106 and S.278 obligations. **Conditions** 1. Delivery and Servicing Plan and Waste Management The owner shall be required to submit a Delivery and Servicing Plan (DSP) for the local authority's approval. The DSP must be in place prior to occupation of the development. The service and 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 within 10 metres carrying distance 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 2. Cycle Parking The applicant will be required to submit plans showing accessible; sheltered, and secure cycle parking for 23 long-stay and 2 short-stay cycle parking spaces for residents and commercial 1 long-stay and 1 short-stay spaces for the commercial unit 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 London Cycle Design Standards (LCDS). 3. Car Parking Management Plan	

	The applicant will be required to provide a Car Parking Management Plan which must include details on the allocation and management of the on-street disabled parking bay. **S.106 obligations** <u>1. Car-Free Agreement</u> The owner is required to enter into a Section 106 Agreement to ensure that the residential units are defined as "car free" and therefore no residents therein will be entitled to apply for a residents parking permit under the terms of the relevant Traffic Management Order (TMO) controlling on-street parking in the vicinity of the development. The applicant must contribute a sum of £4000 (four thousand pounds) towards the amendment of the Traffic Management Order for this purpose. Reason: To ensure that the development proposal is car-free, and any residual car parking demand generated by the development will not impact on existing residential amenity. <u>2. 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, 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 highways condition 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. Reason: to ensure that the impacts of the development proposal on the local highways network are minimised during construction, and to coordinate construction activities in key regeneration areas which will have increased construction activities. <u>3. Car Club Membership</u>	

	The applicant will be required to enter into a Section 106 Agreement to establish a car club scheme, including the provision of adequate car club bays and associated costs, and must include the provision of five years' free membership for all residents and £100 (one hundred pounds in credit) per year/per unit for the first 2 years. Reason: To enable residential and student occupiers to consider sustainable transport options, as part of the measures to limit any net increase in travel movements. <u>4. Commercial Travel Plan</u> A commercial travel plan must be secured by the S.106 agreement and submitted 6 months before occupation. As part of the travel plan, the following measures must be included to maximise the use of public transport. a) The applicant submits a Commercial Travel Plan for the commercial aspect of the Development and appoints a travel plan coordinator who must work in collaboration with the Facility Management Team to monitor the travel plan initiatives annually for a period of 5 years and must include the following measures: b) Provision of commercial 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 facility for the commercial element of the development. 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 5 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 2021 and the Council's Local Plan SP7 and the Development Management DMPD Policy DM 32. <u>5. Residential Travel Plan</u> Within six (6) months of first occupation of the proposed new residential development a Travel Plan for the approved residential uses must be submitted to and approved by the Local Planning Authority detailing means of conveying information for new occupiers and techniques for advising residents of sustainable travel options. The Travel Plan shall then be implemented in accordance with a timetable of implementation, monitoring, and review to be agreed in writing by the Local Planning Authority, we will require the following measures to be included as part of the travel plan to maximise the use of sustainable modes of transport. a) The developer must appoint a travel plan co-ordinator, working in collaboration with the Estate Management Team, to monitor the travel plan initiatives annually for a minimum period of 5 years.	

	b) Provision of welcome induction packs containing public transport and cycling/walking information to every new resident, along with a £200 voucher for active travel related equipment purchases. c) The applicant is required to pay a sum of, £3,000 (three thousand pounds) per year for a period of five years. £15,000 (fifteen thousand pounds) in total for the monitoring of the travel plan initiatives. d) Parking management plan which monitors the provision of disabled car parking spaces for the site and triggers any necessary provision on the local highways network. Reason: To enable residential occupiers to consider sustainable transport options, as part of the measures to limit any net increase in travel movements. <u>6. Parking management contribution.</u> We will require a contribution of £20,000 (twenty Thousand Pounds) from the applicant to undertake a review of the current parking management measures on Bedford Road and the surrounding roads for the implementation of parking and loading measures and potential changes to the CPZ operational hours. Reason: To implement parking management measures to mitigate the impacts of the additional car parking demand that will be generated by the development proposal on the local transport network. <u>7.Highway Improvements</u> The applicant will be required to enter into agreement with the Highway Authority under Section: 38 and 278 of the Highways Act, to pay for any necessary highway works, which includes if required, but not limited to, footway improvement works, access to the Highway, measures for street furniture relocation, carriageway markings, and access and visibility safety requirements, improved pedestrian infrastructure. The developer will be required to provide details of any temporary highways including temporary TMO's required to enable the occupation of each phase of the development, which will have to be costed and implemented independently of the main S.278 works. The works include but are not limited to: 1) The provision of a new wheelchair accessible car parking space with a separate electric vehicle charging facility, type of EV charge to be agreed by the highway authority, and a cycle hanger. 1) Reconstruction of footways nearby to the site to mitigate deterioration caused by the development, 2) Reinstatement of footways where the current vehicle crossovers are located, as they will become redundant as result of the development. The scheme should be design in line with the 'Healthy Streets' indicators perspective, full list of requirements to be agreed with the Highways Authority. The applicant will be required to submit detailed drawings and a Stage 1, and 2 road safety audit of the highways works for all elements of the scheme including the details of the footpath, these drawings should be submitted for approval before any development commences on site. Reason: to improve accessibility to the site by foot and to ensure that the site is in accordance with the London Plan 2021 Policy T2 Healthy Streets a to implement highway works to facilitate future access to the development site.	

Lead Pollution	Thank you for contacting the Carbon Management Team (Pollution) regarding the above application for the demolition of the existing building and the erection of a new mixed-use development up to five storeys high with commercial uses (Use Class E) at ground level, 12no. self-contained flats (Use Class C3) to upper levels and plant room at basement level. Provision of cycle parking, refuse, recycling and storage. Lift overrun, plant enclosure and pv panels at roof level at 13 Bedford Road, Wood Green, London, N22 7AU and I would like to comment as it relates to this service as follows. Having considered the relevant applicant submitted information including: Design and Access Statement, prepared by CG Architects, dated March 2024; Energy & Sustainability Assessment, prepared by EAL Consult, dated February 2024 taking note of the proposal to use Air Source Heat Pumps and PV panels; Outline Construction Logistics Plan with reference STH-804-001-CLP01 prepared by Smart Transport Hub, dated 12th December 2023 taking note of Section 2 (Context, Considerations and Challenges), 3 (Construction Scheme and Methodology), 4 (Vehicle Routing and Site Access), 5 (Strategies to Reduce Impact), 6 (Estimated Vehicle Movements), 7 (Implementation, Monitoring and Updating); Air Quality Assessment with reference 103034 prepared by Miller Goodall Ltd, dated 6th June 2023, taking note of Section 5 (Methodology), 6 (Baseline Air Quality), 7 (Construction Dust Impact Assessment), 8 (Effect of Air Quality on the Proposed Development), 9 (Impact of the Proposed Development on Existing Air Quality), 10 (Air Quality Neutral Assessment); Phase 1 Contaminated Land Assessment with reference 79540R1, prepared by GeoSmart Information Ltd., dated February 2024, 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 recommended should planning permission be granted. 1. Land Contamination Before development commences other than for investigative work: a. Using the information already submitted in Phase 1 Contaminated Land Assessment with reference 79540R1, prepared by GeoSmart Information Ltd., a site investigation shall be designed for the site using information obtained form the desktop study and Conceptual Model. The site investigation must be comprehensive enough to enable; a risk assessment to be undertaken, refinement of the Conceptual Model and the development of a Method Statement detailing the remediation requirements.	Comments noted. Conditions /informative included

	b. The risk assessment and refined Conceptual Model shall be submitted, along with the site investigation report, to the Local Planning Authority which shall be submitted to, and approved in writing by, the Local Planning Authority prior to that remediation being carried out on site. c. Where remediation of contamination on the site is required, completion of the remediation detailed in the method statement shall be carried out and a report that provides verification that the required works have been carried out, shall be submitted to, and approved in writing by the Local Planning Authority before the development is occupied. Reason: To ensure the development can be implemented and occupied with adequate regard for environmental and public safety. 2. Unexpected Contamination If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until a remediation strategy detailing how this contamination will be dealt with has been submitted to and approved in writing by the Local Planning Authority. The remediation strategy shall be implemented as approved. Reasons: To ensure that the development is not put at unacceptable risk from, or adversely affected by, unacceptable levels water pollution from previously unidentified contamination sources at the development site in line with paragraph 109 of the National Planning Policy Framework. 3. NRMM a. No works shall commence on the site until all plant and machinery to be used at the demolition and construction phases have been submitted to, and approved in writing by, the Local Planning Authority. Evidence is required to meet Stage IIIB of EU Directive 97/68/ EC for both NOx and PM. No works shall be carried out on site until all Non-Road Mobile Machinery (NRMM) and plant to be used on the site of net power between 37kW and 560 kW has been registered at http://nrmm.london/. Proof of registration must be submitted to the Local Planning Authority prior to the commencement of any works on site. b. An inventory of all NRMM must be kept on site during the course of the demolitions, site preparation and construction phases. All machinery should be regularly serviced and service logs kept on site for inspection. Records should be kept on site which details proof of emission limits for all equipment. This documentation should be made available to local authority officers as required until development completion.	

	4 Demolition/Construction Environmental Management Plan a. Demolition works shall not commence within the development until a Demolition Environmental Management Plan (DEMP) has been submitted to and approved in writing by the local planning authority whilst b. Development shall not commence (other than demolition) until a Construction Environmental Management Plan (CEMP) has been submitted to and approved in writing by the local planning authority The following applies to both Parts a and b above: a) The DEMP/CEMP shall include a Construction Logistics Plan (CLP) and Air Quality and Dust Management Plan (AQDMP). b) The DEMP/CEMP shall provide details of how demolition/construction works are to be undertaken respectively and shall include: i. A construction method statement which identifies the stages and details how works will be undertaken; ii. Details of working hours, which unless otherwise agreed with the Local Planning Authority shall be limited to 08.00 to 18.00 Monday to Friday and 08.00 to 13.00 on Saturdays; iii. Details of plant and machinery to be used during demolition/construction works; iv. Details of an Unexploded Ordnance Survey; v. Details of the waste management strategy; vi. Details of community engagement arrangements; vii. Details of any acoustic hoarding; viii. A temporary drainage strategy and performance specification to control surface water runoff and Pollution Prevention Plan (in accordance with Environment Agency guidance); ix. Details of external lighting; and, x. Details of any other standard environmental management and control measures to be implemented. c) The CLP will be in accordance with Transport for London's Construction Logistics Plan Guidance (July 2017) and shall provide details on: i. Monitoring and joint working arrangements, where appropriate; ii. Site access and car parking arrangements; iii. Delivery booking systems; iv. Agreed routes to/from the Plot;	

	v. Timing of deliveries to and removals from the Plot (to avoid peak times, as agreed with Highways Authority, 07.00 to 9.00 and 16.00 to 18.00, where possible); and vi. Travel plans for staff/personnel involved in demolition/construction works to detail the measures to encourage sustainable travel to the Plot during the demolition/construction phase; and vii. Joint arrangements with neighbouring developers for staff parking, Lorry Parking and consolidation of facilities such as concrete batching. d) The AQDMP will be in accordance with the Greater London Authority SPG Dust and Emissions Control (2014) and shall include: i. Mitigation measures to manage and minimise demolition/construction dust emissions during works; ii. Details confirming the Plot has been registered at http://nrmm.london; iii. Evidence of Non-Road Mobile Machinery (NRMM) and plant registration shall be available on site in the event of Local Authority Inspection; iv. An inventory of NRMM currently on site (machinery should be regularly serviced, and service logs kept on site, which includes proof of emission limits for equipment for inspection); v. A Dust Risk Assessment for the works; and vi. Lorry Parking, in joint arrangement where appropriate. 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.	
Carbon Team	**Carbon Management Response 26/09/2024** In preparing this consultation response, we have reviewed: • Energy and Sustainability Assessment prepared by EAL Consult (revised Feb 2024)	Comments noted. Conditions and legal agreement Clauses included

	• Overheating Assessment rev I prepared by EAL Consult (this revision has superseded the Overheating Assessment as originally included in the Energy and Sustainability Assessment) • Biodiversity Net Gain Assessment by Arbtech (dated 11/04/24) • Sustainability section in Design and Access Statement prepared by CG Architects (dated March 2024) • GLA Carbon Emissions Reporting Spreadsheet.xlsx • Noise Impact Assessment by Stinton Jones Consulting Engineer (dated June 2022) • Relevant supporting documents. Missing required information: • BREEAM Pre-Assessment for the commercial units Summary The development achieves a reduction of 89% carbon dioxide emissions on site, which is supported in principle. However, the submitted reports requires amendments and the energy modelling does not fully represent the total proposed residential area. Therefore, further clarification is required in regards to the Energy and Overheating strategy. Carbon Management cannot currently support this application for the following reasons: • The Energy and Sustainability Assessment is not in line with the GLA Energy Assessment Guidance 2022. The baseline for residential units has only included the carbon emissions of 9 units, not all 12 units. Incorrect parameters are modelled under Baseline and Be Lean scenarios. • Overheating assessment must use Central London weather file, instead of London Gatwick weather file. The assessment has not considered the recommendations from the Noise Impact Assessment. • The application fails to comply with the Local Plan Policy SP4 as it lacks a BREEAM Pre-Assessment, demonstrating that at least a rating of 'Very Good' can be achieved, aiming for 'Excellent'. Further information needs to be provided to address this objection, in relation to Energy the Energy Strategy, Overheating Strategy and Sustainability (BREEAM). This should be addressed prior to the determination of the application. 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 CO_2 emissions for the development shows an improvement of approximately 89% 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 7.4 tonnes of CO_2 from a baseline of 8.3 tCO_2/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 have not been provided.

Site-wide (SAP10.2 emission factors)			
	Total regulated emissions (Tonnes CO_2 / year)	**CO_2 savings (Tonnes CO_2 / year)**	**Percentage savings (%)**
Part L 2021 baseline	8.3		
Be Lean	2.9	5.4	65%
Be Clean	2.9	0	0%
Be Green	0.9	1.9	23%
Cumulative savings		7.4	89%
Carbon shortfall to offset (tCO_2)	0.9		
Carbon offset contribution	£95 x 30 years x 0.9 tCO_2/year = £2669.5		
10% management fee	£270		

	Residential	**Non-residential**

(SAP10.2 emission factors)	Total regulated emissions (tCO_2/ year)	CO_2 savings (tCO_2 / year)	Percentage savings (%)	Total regulated emissions (tCO_2/ year)	CO_2 savings (tCO_2/ year)	Percentage savings (%)
Part L 2021 Baseline	7.0			1.3		
Be Lean savings	1.6	5.4	77%	1.3	0	3%
Be Clean savings	1.6	0	0%	1.3	0	0%
Be Green savings	0.1	1.5	22%	0.9	0.4	31%
Cumulative savings		6.9	99%		0.5	35%
Carbon shortfall to offset (tCO_2)	0.1			0.9		

SAP sheets of Flat 4, 5 and 11 of all stages have been submitted as a representative section of dwellings. BRUKL sheets of all stages for both commercial units have also been provided.

Actions:

- GLA Carbon Emissions Reporting Spreadsheet has only included the Part L outputs for Flat 4 to 12 but with Flat 1 to 3 missing. Applicant should also include the outputs of all flats and update the total regulated emissions and percentage savings across all stages.
- The total residential area represented by the modelling (~519 sq.m) is less than the actual proposed GIA of 808 sq.m. Therefore, the results reported by the GLA carbon emission spreadsheet does not fully represent the proposed residential part of the development. Please amend.

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

Applications are required to report on the total Energy Use Intensity (EUI) and Space Heating Demand (SHD), in line with the GLA Energy Assessment Guidance (June 2022). The Energy Strategy should follow

the reporting template set out in Table 5 of the guidance, including what methodology has been used. EUI is a measure of the total energy consumed annually, but should exclude on-site renewable energy generation and energy use from electric vehicle charging.

	Proposed Development	GLA Benchmark
Building type	Residential	Residential
EUI	2.4 kWh/m^2/year	Meets GLA benchmark of 35kWh/m^2/year
SHD	6.8 kWh/m^2/year	Meets GLA benchmark of 15 kWh/m^2/year
Methodology used	Part L1 SAP 10.2	

	Proposed Development	GLA Benchmark
Building type	Commercial	Residential/School/Office/Hotel/All other non-residential
EUI	54.7 kWh/m^2/year	Meets benchmark of 55 kWh/m^2/year
SHD	6.0 kWh/m^2/year	Meets GLA benchmark of 15 kWh/m^2/year
Methodology used	Part L2 SBEM	

<u>Actions:</u>

- The submitted EUIs have not included unregulated energy. Please update the figures to include unregulated energy for both residential and commercial.
- Residential: Energy Use Intensity should include the energy required for space heating, but currently the proposed EUI is smaller than SHD. Applicant to check if they have modelled the development correctly and revise their EUI and SHD figures accordingly.

Energy – Leam

The applicant has proposed a side-wide saving of 5.4 tCO_2 in carbon emissions (65%) through improved energy efficiency standards in key elements of the build.

The residential has a saving 5.4 tCO_2 in carbon emissions (77%) through improved energy efficiency standards. This goes beyond the minimum 10% set in London Plan Policy SI2, so this is supported.

The commercial only has a saving of 0.0 tCO_2 in carbon emissions (3%) through improved energy efficiency standards. This is below the 15% reduction set in London Plan Policy SI2. However, the calculations at Be Lean Stage for the commercial require clarifications and revision.

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

Floor u-value	0.18 W/m^2K
External wall u-value	0.15 W/m^2K
Roof u-value	0.11 W/m^2K
Door u-value	0.8 W/m^2K
Window u-value	0.8 W/m^2K
G-value	TBC
Air permeability rate	3 m^3/hm^2 @ 50Pa (residential) 8 m^3/hm^2 @ 50Pa (commercial)
Ventilation strategy	Residential: Natural ventilation Commercial: TBC
Waste Water Heat recovery	TBC
Thermal bridging	Bespoke values (refer to ES for details)
Low energy lighting	100%
Heating system (efficiency / emitter)	Residential: TBC Commercial: ASHPs
Thermal mass	High
Improvement from the target fabric energy efficiency (TFEE)	14% improvement, from 34.26 to 29.36 MWh/year

	<u>Actions:</u> Residential: - Be Lean stage should be modelled using gas boilers with notional efficiency (~89.50) to match the notional building. Please update Be Lean worksheet for all residential units and amend the carbon reduction figure accordingly. - The East elevation has a high proportion of glazed area. Please consider following the LETI Climate Emergency Design Guide principles in façade design. - The proposed U-values of window and doors are 0.8 W/m^2K, this can be achieved by using triple-glazing and this is supported. However, the windows and doors as shown on the elevations are shown as double-glazed which cannot achieve the required U-value. Applicant to ensure the proposal and the energy modelling are aligned. - The proposed air permeability rate is 8 m^3/hm^2 @ 50Pa for the commercial units, this is the maximum permissible rate under Part L. Applicant should improve the target air tightness of the commercial units. - Table 10 of ES has indicated the proposed G-value of glazing is 1.6 W/m^2K. This is incorrect, as G-value is a coefficient between 0-1 and without unit. - Noise Impact Assessment has recommended mechanical ventilation to the bedrooms facing Redford Road. Please consider mechanical ventilation with heat recovery to further reduce heat losses. - At the interfaces where terraces form the roofs of the floors below, applicant to ensure the section has allowed sufficient depth for insulation to achieve the required U-value while allowing level access to the terrace. Parapet and terrace junctions should be carefully detailed to minimise thermal bridges. Please provide indicative details to demonstrate this. - Please confirm if Waste Water Heat recovery will be provided. - High thermal mass has been identified as part of the Overheating Strategy. Please provide the principles of the proposed high thermal mass construction. Commercial: - Be Lean stage has been modelled with proposed building systems and the proposed efficiency of the ASHP has also been included at Be Lean stage. The proposed heating system and the notional efficiency figures should be used for the modelling for Be Lean. The actual efficiency figure shall only be used under Be Green scenario as per GLA energy assessment guidance. Applicant to revise their BRUKL modelling. - The energy consumption of cooling is higher in the Actual Building than the Notional Building, please can applicant explain the reason?	

	- Please can applicant confirm if notional PVs have been included in the Baseline modelling? - Please confirm if the commercial shopfront will have the same U-value 0.8 W/m^{2}K as the windows and doors. - Please confirm the ventilation strategy for the commercial units. - The display lights in the commercial units modelled in BRUKL worksheets have low efficiency. Please use high efficiency LED lighting. Overheating is dealt with in more detail below. Energy – Clean London Plan Policy SI3 calls for major development in Heat Network Priority Areas to have a communal low-temperature heating system, with the heat source selected from a hierarchy of options (with connecting to a local existing or planned heat network at the top). Policy DM22 of the Development Management Document supports proposals that contribute to the provision and use of Decentralised Energy Network (DEN) infrastructure. It requires developments incorporating site-wide communal energy systems to examine opportunities to extend these systems beyond the site boundary to supply energy to neighbouring existing and planned future developments. It requires developments to prioritise connection to existing or planned future DENs. The applicant is not proposing any Be Clean measures. The site is not within reasonable distance of a proposed Decentralised Energy Network (DEN). A Combined Heat and Power (CHP) plant would not be appropriate for this site. Energy – Green As part of the Be Green carbon reductions, all new developments must achieve a minimum reduction of 20% from on-site renewable energy generation to comply with Policy SP4. 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 1.9 tCO_2 (23%) reduction of emissions are proposed under Be Green measures.	

	The solar array peak output is proposed to be 13.25 kWp. The amount of renewable electricity produced per year and the corresponding carbon reduction have not been provided. A total of 33 panels would be mounted on the flat roof area facing south. Residential: The communal ASHP systems (min. SCOP of 4.95 for water temperature at 35 / SCOP of 3.52 for water temperature at 55) will provide hot water and heating to the dwellings through underfloor heating. Commercial: Proposed heat pump system has a COP of 350%, EER of 350% and SEER of 650%. All ASHPs will be located at the roof level with plant enclosure. <u>Actions:</u> - The Energy Statement has mentioned a PV output of 13.25 kWp in section 4d of the document; however section 7 has mentioned there is additional PV outputs of 8.26 kWp for the commercial units. Applicant to clarify their PV proposal. - Please provide the assumed efficiency and angle of the panels. - Please provide some commentary on how the available roof space has been maximised to install solar PV. - While the roof space should be maximised for install solar PV, applicant also to ensure there is adequate space for green roof beneath the PV panels to grow and zoning should be allowed for the installation of fall restraint system. - Please confirm if the ASHPs will provide 100% of demand or if any electric immersion heater will be provided. - Please provide details on the plant enclosure. Energy – Be Seen London Plan Policy SI2 requests all developments to 'be seen', to monitor, verify and report on energy performance. The GLA requires all major development proposals to report on their modelled and measured operational energy performance. This will improve transparency on energy usage on sites, reduce the performance gap between modelled and measured energy use, and provide the applicant, building managers and occupants clarity on the performance of the building, equipment and renewable energy technologies.	

	The applicant should install metering equipment on site, with sub-metering by dwelling and non-residential unit. A public display of energy usage and generation should also be provided in the main entrance area to raise awareness of residents/businesses. - Please confirm that sub-metering will be implemented for residential and commercial units. - What are the unregulated emissions and proposed demand-side response to reducing energy: smart grids, smart meters, battery storage? - Demonstrate that the planning stage energy performance data has been submitted to the GLA webform for this development: (https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance/be-seen-energy-monitoring-guidance/be-seen-planning-stage-webform) Carbon Offset Contribution A carbon shortfall of 0.9 tCO_2/year remains. The remaining carbon emissions will need to be offset at £95/tCO_2 over 30 years. 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 for the commercial and residential units in line with CIBSE TM52 and TM59 accordingly, but it has used TM49 weather files for the London Gatwick Weather data. As noted in our pre-app comments and the planning validation check-list, **Central London weather file** must be used instead, as it represents more accurately the urban heat island effect. The cooling hierarchy has been followed in the design. **Residential:** The report has modelled all habitable rooms (kitchen/living and bedrooms) of all flats for a naturally ventilated building. The DSYs used for modelling are: DYS 1 (2020), DYS 2 (2020), DYS 3 (2020).	

Commercial:
The report has modelled all units including WCs and corridor.
The DSYs used for modelling have not been provided.

It is unclear if the testing results for DYS 1 (2020), DYS 2 (2050) and DYS 2 (2080) at the last page of the Overheating Assessment are for the commercial units.

The Overheating Assessment has not incorporated the recommendations from the Noise Assessment Report. The recommendations are as below:

- The noise levels of bedrooms facing Bedford Road have exceeded the acoustic recommendations. These windows will be closed at night and therefore cannot provide the purge ventilation to the rooms to prevent overheating in summer. The rooms should be provided with mechanical ventilation to provide 4 air changes per hour.
- The living rooms facing Bedford Road can be ventilated by open windows but should be provided with means of background ventilation with acoustic vents.
- Windows at the rear elevation (West elevation) can be opened for ventilation at any time without disruptive noise.

Results are listed in the table below.

Domestic: CIBSE TM59	Predominantly naturally ventilated		Predominantly mechanically ventilated	Number of corridors pass
	Criterion A (<3% hours)	Criterion B for bedrooms (less than 33 hours) *	Number of habitable rooms pass (<3% hours)	
DSY1 2020s	Pass	Pass	-	-
DSY2 2020s	Pass	Pass	-	-
DSY3 2020s	Pass	Pass	-	-
DSY1 2050s	-	-	-	-
DSY2 2050s	-	-	-	-
DSY3 2050s	-	-	-	-

DSY1 2080s	-	-	-	-
DSY2 2080s	-	-	-	-
DSY3 2080s	-	-	-	-

* Applicant to clarify the assessment Criterion for bedrooms

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 **	All pass
DSY2 2020s	-
DSY3 2020s	-
DSY1 2050s	-
DSY2 2050s	-
DSY3 2050s	-
DSY1 2080s	-
DSY2 2080s	-
DSY3 2080s	-

** Applicant has not provided which DYS has been used for assessment.

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

- Natural ventilation, with windows 100% openable
- External horizontal louvres / brise soleils above windows to the East façade
- External green walls to the west façade
- Projecting balconies from the floor above to the south facade
- No active cooling for residential units

Revised Overheating Assessment is required using the correct weather file and incorporating the recommendations from the Noise Assessment Report.

<u>Actions:</u>

- Redo the overheating modelling with the Central London weather file.

	- Please amend the overheating modelling in response to the Noise Assessment Report and indicate the requirements (e.g. acoustic vents) on the elevations.
	- Specify the ventilation strategy, including: floorplans showing which habitable spaces will be predominantly naturally ventilated or mechanically ventilated, specification of the proposed mechanical ventilation (efficiency and air changes), window opening areas.
	- If there are limitations on openable windows, applicants are required to submit two separate overheating analyses: one with openable windows and one with closed windows (for details see GLA Energy Assessment Guidance 8.10 and Haringey's Key Overheating Planning Application Requirements document). This is to ensure that passive measures have been maximised and the façade design has been optimised regardless of the constraints posed by the site's location.
	- Please clarify which assessment criterion has been used for table 4, 5 and 6. Criterion A has been indicated on the tables, but Criterion B should be used for assessment of bedrooms according to TM59 guidance.
	- Please confirm if the communal corridors serving the flats are external and therefore not been modelled.
	- Please confirm if active cooling has not been proposed for the commercial units.
	- Undertake further modelling for the residential units and commercial units (if applicable):
	  o For Residential: Model the DSY1 for the 2050s and 20280s.
	  o For Commercial: Model the 2020s DSY 2 and 3 and DSY1 for the 2050s and 20280s. Ensure the design has incorporated as many mitigation measures to pass these more extreme and future weather files as far as feasible. Any remaining overheating risk should inform the future retrofit plan.
	- Set out a retrofit plan for future and more extreme weather files, demonstrating how these measures can be installed, how they would reduce the overheating risk, what their lifecycle replacement will be, and who will be responsible for overheating risk.
	- Demonstrate how the future mitigation measures will improve the overheating results.
	- Confirm who will own the overheating risk when the building is occupied (not the residents).
	- This development should have a heatwave plan / building user guide to mitigate overheating risk for occupants.
	
	Sustainability
	Policy DM21 of the Development Management Document requires developments to demonstrate sustainable design, layout and construction techniques. The sustainability section in the report sets out the proposed measures to improve the sustainability of the scheme, including transport, health and wellbeing,	

	materials and waste, water consumption, flood risk and drainage, biodiversity, climate resilience, energy and CO2 emissions and landscape design. Summary of proposal: - Water efficient measures have been proposed to reduce water consumption by 50% in both residential and commercial units. Total internal water consumption will not exceed 105 litres/person/day. - A minimum of 80% of construction waste will be diverted from landfill rate. - A minimum of 90% of demolition waste will be diverted from landfill rate. - A pre-demolition survey has been carried out confirming 80% of materials are recyclable. - The development will ensure all timber will be FSC certified. At least 80% of building materials will be responsibly sourced, materials rated with an A or B in the BRE Green Guide to Specification will be preferred. - At least 20% of total value of materials will derive from recycled or with reused content. - Steel will have high recycled content and concrete will use 50% GGBS. Residential: Total 26 bike spaces in the sheltered bike store have been provided. Commercial: 2 spaces have been provided in a sheltered store. <u>Action:</u> - Set out how surface water runoff will be reduced, that it will be separated from wastewater and not discharged into the sewer. ***Non-Domestic BREEAM Requirement*** 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 not prepared a BREEAM Pre-Assessment Report for the commercial units. <u>Actions:</u> - Please submit the BREEAM Pre-Assessment report. ***Urban Greening / Biodiversity*** 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 100%, which is above the 10% requirement as set out in the Environment Act 2021. The Urban Greening Factor of the development is 0.4 through the implementation of green roof with a min. 150m deep substrate and green wall. <u>Actions:</u> - Set out what urban greening and biodiversity enhancement measures will be proposed (e.g. green infrastructure, bird boxes, bat boxes etc to connect to the green spaces around the site, living roofs, living walls, etc.) - Please consider planting of species rich native flora to maximise the biodiversity value of the site as highlighted in the Biodiversity Net Gain Assessment. ***Living roofs and walls*** All development sites must incorporate urban greening within their fundamental design, in line with London Plan Policy G5. The development is proposing living roofs and walls in the development. All landscaping proposals and living roofs should stimulate a variety of planting species. Mat-based, sedum systems are discouraged as they retain less rainfall and deliver limited biodiversity advantages. The growing medium for extensive roofs must be 120-150mm deep, and at least 250mm deep for intensive roofs (these are often roof-level amenity spaces) to ensure most plant species can establish and thrive and can withstand periods of drought. Living walls should be rooted in the ground with sufficient substrate depth. Living roofs are supported in principle, subject to detailed design. Details for living roofs will need to be submitted as part of a planning condition. Actions:	

	- Further details of the living green wall are required. Please provide the details of the proposed green wall system, the base detail including substrate build-up, the planting species, irrigation provision, access and maintenance strategy. - Applicant to ensure there is sufficient build-up on the roof and parapet height to accommodate a minimum substrate depth. Planning Conditions To be secured (with detailed wording TBC) Planning Obligations Heads of Terms - Be Seen commitment to uploading energy data - Energy Plan - Sustainability Review - Estimated carbon offset contribution (and associated obligations) of £2669.5 (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. **Carbon Management Response 23/01/2024** In preparing this consultation response, we have reviewed: • Energy and Sustainability Assessment rev 1 prepared by EAL Consult (date Oct 2024) – this includes an updated Overheating Assessment in the appendix • TM54 Operational Energy Assessment by AJIBS Design UK Limited • BREEAM Pre-Assessment for commercials prepared by EAL Consult (dated Jul 2023) • GLA Carbon Emissions Reporting Spreadsheet rev 1.xlsx • GLA Be Seen Spreadsheet.xlsm • Relevant supporting documents. Summary The development achieves a reduction of 82% carbon dioxide emissions on site, which is supported in principle. Applicant has corrected their calculation methodology in accordance with GLA Energy Assessment Guidance, hence there is a slight reduction of overall carbon dioxide emissions from 89% as	

previously reported. Applicant must provide clarifications on Overheating Strategy prior to determination. Planning conditions have been recommended to secure the benefits of the scheme.

Energy Strategy

The development shows an overall predicted reduction of approximately 82% in carbon emissions with SAP10.2 carbon factors from 89% previously, as the applicant has now included the previous missing emissions of flat 1-3. This represents an annual saving of approximately 10.1 tonnes of CO_2 from a baseline of 12.3 tCO_2/year. The Be Lean reduction has also reduced to 28% from the previous 65%, as the applicant has now modelled correctly using gas boiler as the heating system for Be Lean stage.

Site-wide (SAP10.2 emission factors)			
	Total regulated emissions (Tonnes CO_2 / year)	**CO_2 savings (Tonnes CO_2 / year)**	**Percentage savings (%)**
Part L 2021 baseline	12.3		
Be Lean	8.9	3.4	28%
Be Clean	8.9	0	0%
Be Green	2.2	6.7	54%
Cumulative savings		10.1	82%
Carbon shortfall to offset (tCO_2)	2.2		
Carbon offset contribution	£95 x 30 years x 2.2 tCO_2/year = £6,288		
10% management fee	£628		

	Residential			**Non-residential**		
(SAP10.2 emission factors)	**Total regulated emissions**	**CO_2 savings**	**Percentage savings (%)**	**Total regulated emissions**	**CO_2 savings**	**Percentage savings (%)**

	(tCO_2/ year)	(tCO_2 / year)		(tCO_2/ year)	(tCO_2/ year)	
Part L 2021 Baseline	10.7			1.6		
Be Lean savings	7.9	2.8	26%	1.0	0.6	39%
Be Clean savings	7.9	0	0%	1.0	0	0%
Be Green savings	1.5	6.4	60%	0.7	0.3	17%
Cumulative savings		9.2	86%		0.9	56%
Carbon shortfall to offset (tCO_2)	1.5			0.7		

Applicant has modelled all flats and the GLA Carbon Emissions Reporting Spreadsheet has included all dwelling units.

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

	Proposed Development*	GLA Benchmark
Building type	Residential	Residential
EUI	7.8 kWh/m^2/year	Meets GLA benchmark of 35kWh/m^2/year
SHD	2.8 kWh/m^2/year	Meets GLA benchmark of 15 kWh/m^2/year
Methodology used	Part L1 SAP 10.2	

	Proposed Development*	GLA Benchmark

Building type	Commercial	Residential/School/Office/Hotel/All other non-residential
EUI	967 kWh/m^2/year	Does not meet benchmark of 55 kWh/m^2/year
SHD	6.0 kWh/m^2/year	Meets GLA benchmark of 15 kWh/m^2/year
Methodology used	Part L2 SBEM	

* The result from the ES has been used for the above two tables.

Applicant has also submitted a TM54 Operational Energy Assessment which has included unregulated energy use. The report has indicated the annual energy consumption for the residential part of the building is approximately 117kWh/m2, with consumption in the retail approximately 171kWh/m2. This is different to the results reported from the ES.

Actions:

- Both the EUI and SHD of the residential units are exceptionally low, applicant to confirm if they are the correct information.
- The EUI of the commercial units from the ES is exceptionally high possibly due to potential mathematical error. Applicant to provide the corrected EUI or explanation.
- Applicant to clarify why the annual energy consumptions for residential and commercial are so different to that in ES.

Energy – Lean

The applicant has proposed a side-wide saving of 3.4 tCO_2 in carbon emissions (28%) under Be Lean: a saving 2.8 tCO_2 for the residential (26%), and a saving of 0.6 tCO_2 for the commercial (39%). Both areas comply with London Plan Policy SI2.

The following u-values, g-values and air tightness have been improved from previous submission or further clarifications have been provided:

Window u-value	0.8 W/m^{2}K (this will include shopfront of commercial units)
G-value	0.5

Air permeability rate	5 m^3/hm^2 @ 50Pa (commercial)
Ventilation strategy	Residential: MVHR Commercial: Natural ventilation
Waste Water Heat recovery	Included
Thermal bridging	Y-value of 0.140 aligning with enhanced construction detail.
Heating system (efficiency / emitter)	Residential: Gas boiler under Be Lean Stage Commercial: Gas boiler under Be Lean Stage
Thermal mass	188.6 kJ/m2K Medium/high – although this thermal mass needs to be exposed internally to function as a buffer
Improvement from the target fabric energy efficiency (TFEE)	16% improvement, from 33.42 to 28.12 MWh/year

<u>Actions:</u>

Residential:

- At the interfaces where terraces form the roofs of the floors below, applicant to ensure the section has allowed sufficient depth for insulation to achieve the required U-value while allowing level access to the terrace. Parapet and terrace junctions should be carefully detailed to minimise thermal bridges. Please provide indicative details to demonstrate this, this will be conditioned.
- Applicant clarified WWRS has not been proposed in the meeting, However the provision of WWRS has been included in the modelling of Be Lean and Be Green stages. Applicant to revise SAP worksheets to reflect the actual proposal.

Commercial:

- The floor U-value has been modelled as 0.13W/m2K as shown in BRUKL worksheet instead of 0.18W/m2K as stated in ES. Better (lower) U-value is supported, but applicant should clarify.
- The heating system of the commercial units has been incorrectly modelled as gas boiler system. The commercial units should be modelled with the proposed buildings system (i.e. combined heat and cooling system) at Be Lean stage but using the notional efficiency figures. The actual efficiency figure shall only be used under the Be Green scenario as per the GLA energy assessment guidance.

Energy – Green

A total of 6.7 tCO_2 (54%) reduction of emissions are proposed under Be Green measures.

	The solar array peak output is proposed to be 11.16 kWp covering 55.m2 roof space (9.16 kWp apportioned to the residential, and 2 kWp to the commercial). PV panels will be mounted on the flat roof facing south at 15 degrees. The amount of renewable electricity produced per year, the corresponding carbon reduction and the number of PV panels have not been provided.
	
	Space heating for the commercial units will be provided by a combined heating and cooling system.
	
	<u>Actions:</u>
	- The solar array peak output has been reduced from previous 13.25 kWp to the current proposal of 11.16 kWp. Applicant to clarify the reason and also to provide a roof plan to demonstrate the number of PV panels has been optimized while allowing sufficient space for plant equipment and roof maintenance.
	- Please confirm the amount of renewable electricity produced per year by PV panels (in kWh/year) and the proposed inverter capacity.
	- Please confirm if the commercial units will each have their own PV array and benefit from its generation independently. It may be worth apportioning more of the PV array to the commercial units as they will use electricity during the daytime.
	- The roof space should be maximised to deliver its requirements and benefits.
	  o Please provide details on the plant enclosure.
	  o There should be adequate space for the green roof beneath the PV array to grow.
	  o Space should be allowed for the installation of fall restraint system.
	  o Please demonstrate and confirm that the roof space has maximised its PV provision.
	
	Energy – Be Seen
	The applicant has confirmed that both residential and non-residential units will be installed with their own sub-meter and smart metering equipment, with display of energy usage and generation to raise awareness of occupants. The applicant has now also submitted the planning stage Be Seen spreadsheet.
	
	Carbon Offset Contribution
	A carbon shortfall of 2.2 tCO_2/year remains. The remaining carbon emissions will need to be offset at £95/tCO_2 over 30 years plus 10% management fee.
	
	Overheating	

The applicant has revised their overheating assessment using the Central London weather file.

Recommendations from Noise Assessment Report has now been incorporated:

- The noise levels of bedrooms facing Bedford Road have exceeded the acoustic recommendations. These windows will be closed at night and therefore cannot provide the purge ventilation to the rooms to prevent overheating in summer. The rooms should be provided with mechanical ventilation to provide 4 air changes per hour.
- The living rooms facing Bedford Road can be ventilated by open windows but should be provided with means of background ventilation with acoustic vents.

Residential:
The report has modelled all habitable rooms (kitchen/living and bedrooms) of all flats for a naturally ventilated building. Corridors are external and therefore not modelled. It has stated options have been considered for the scenarios with windows open:

1. Windows open, no internal blinds;
2. Windows closed, no internal blinds with limited cooling from the MVHR of 18 W/m2;
3. As scenario 3, (DSY2);
4. As scenario 3, (DSY3).

However, it is unclear which scenario (1-3) has been modelled for DSY1 using 2020s weather files.

Commercial:
The proposal has only been modelled with a mechanical cooling scenario. All spaces pass with all three criteria.

Residential	Commercial
Proposed mitigation measures to pass the overheating requirements for 2020s DSY1: - Natural ventilation, with windows 100% openable facing Alexandra Park Road - Bedrooms facing Bedford Road: Windows closed with mechanical ventilation providing 4 air changes per hour - Living room facing Bedford Road: Ventilated by open windows but provided with background ventilation with acoustic vents.	Proposed mitigation measures: - Non-openable windows, mechanical ventilation (no details).

	- External horizontal louvres / brise soleils above windows to the East façade - External green walls to the west façade - Projecting balconies from the floor above to the south facade - No active cooling for residential units	- Active cooling (no details).		
	A future retrofit plan has been proposed with the following measures: - Solar shading and window films - Enhanced natural ventilation such as automated window actuators for nighttime ventilation and cross-ventilation - High-performance insulation for roof and external walls, such as reflective roof coatings - MVHR - Low-energy cooling units as a back-up			

	<u>Actions:</u>
	- The cooling hierarchy has not been followed correctly, so the overheating strategy cannot be supported. Internal blinds cannot be used to comply with the overheating criteria. Scenario 2 is therefore discounted. The applicant should demonstrate the performance of the dwellings with the following scenarios, with modelling results in an appendix:
	  - Openable windows (unconstrained) and any mitigation measures to meet the minimum DSY1 2020s weather file.
	  - Policy compliant scenario (constrained): Bedroom windows closed at night and background ventilation for LKD rooms to meet noise mitigation recommendations.
	  - This scenario should then be modelled with sub-scenarios to demonstrate how the cooling hierarchy is being followed by integrating mitigation measures in the order of the hierarchy. i.e. external shading (movable / fixed) prior to modelling any additional ventilation or active cooling. This is to ensure that passive measures have been maximised and the façade design has been optimised regardless of the constraints posed by the site's location			

	○ Future compliance: modelling future mitigation measures to pass more extreme weather files (2020s DSY2-3; 2050s DSY1 etc). This should just show what measures can be taken and what their effect would be. - Thereafter, the applicant should confirm the list of measures proposed in order for all spaces to pass 2020s DSY1. For details see GLA Energy Assessment Guidance 8.10 and Haringey's Key Overheating Planning Application Requirements document. - The future retrofit plan should not include MVHR, as MVHR has already been included as part of the current proposal. Future insulation retrofitting for walls is technically difficult, it is recommended to improve the currently proposed external wall U-values. - Commercial: As a baseline, the applicant should model commercial units without active cooling first, ensuring all passive measures have been maximised before modelling for active cooling. For example, this could include an awning. The capacity of the ventilation and cooling demand (if required), should also be provided. Sustainability Applicant has provided additional information on measures to reduce surface water runoff and overall discharge, this includes green roofs, planting and a small soakaway will be included to adsorb any excess surface water not controlled by the on-site greening measures. <u>Action:</u> - Applicant to confirm if any remaining surface water runoff will be separated from wastewater and not discharged into the sewer. ***Non-Domestic BREEAM Requirement*** The pre-assessment outlined that the proposed development could achieve a BREEAM "Excellent" rating of a minimum score of 74.14%, this is subject to further evidence being submitted to the BRE to obtain a Design Stage certificate demonstrating Excellent can be achieved. ***Urban Greening / Biodiversity*** A biodiverse green roof of up to 96m2 has been included along with an area of green wall. Applicant has confirmed effort will be made to plant species rich in native flora. The further information sent by the applicant has not addressed our previous comments. <u>Actions:</u>	

	- Applicant to consider further incorporating biodiversity enhancement measures such as wildlife boxes such as bird boxes and bat boxes. - Applicant is encouraged to consider incorporate in-built planters in external terraces to provide planting opportunities for the residents. - Applicant to ensure there is sufficient build-up on the roof and parapet height to accommodate a minimum substrate depth of 150mm. Further details of the living green wall will be conditioned. Planning Conditions The following conditions are recommended to secure the benefits of the scheme, and have been drafted to address the outstanding matters above. It is expected that clarifications and remodelling of overheating is provided prior to a decision, upon which conditions will be edited. <u>*Energy Strategy*</u> *The development hereby approved shall be constructed in accordance with the Energy and Sustainability Assessment rev 1 by EAL Consult (date Oct 2024) delivering a minimum 82% improvement on carbon emissions over 2021 Building Regulations Part L, with high fabric efficiencies, communal air source heat pumps (ASHPs) and a minimum 11.16 kWp solar photovoltaic (PV) array.* *(a) Prior to above ground construction, details of the Energy Strategy shall be submitted to and approved by the Local Planning Authority. This must include:* - *Confirmation of how this development will meet the zero-carbon policy requirement in line with the Energy Hierarchy;* - *Confirmation of the necessary fabric efficiencies to achieve a minimum 28% reduction;* - *Details to reduce thermal bridging including the parapet and terrace junctions;* - *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;* - *Specification and efficiency of the proposed Mechanical Ventilation and Heat Recovery (MVHR), with plans showing the rigid MVHR ducting and location of the unit;* - *Details of the PV, demonstrating the roof area has been maximised, with the following details: a roof plan; the number, angle, orientation, type, and efficiency level of the PVs; how overheating of the*	

	panels will be minimised; their peak output (kWp) and annual energy generation (kWh/year); inverter capacity; and how the energy will be used on-site before exporting to the grid; - *Specification of any additional equipment installed to reduce carbon emissions, if relevant;* - *A metering strategy.* *The development shall be carried out strictly in accordance with the details so approved prior to first operation and shall be maintained and retained for the lifetime of the development.* *(b) The solar PV arrays/air source heat pumps must be installed and brought into use prior to first occupation of the relevant block. Six months following the first occupation of that block, evidence that the solar PV arrays have been installed correctly and are operational shall be submitted to and approved by the Local Planning Authority, including photographs of the solar array, installer confirmation, an energy generation statement for the period that the solar PV array has been installed, and a Microgeneration Certification Scheme certificate. The solar PV array shall be installed with monitoring equipment prior to completion and shall be maintained at least annually thereafter.* *(c) Within six months of first occupation, evidence shall be submitted to the Local Planning Authority that the development has been registered on the GLA's Be Seen energy monitoring platform.* *Reason: To ensure the development reduces its impact on climate change by reducing carbon emissions on site in compliance with the Energy Hierarchy, and in line with London Plan (2021) Policy SI2, and Local Plan (2017) Policies SP4 and DM22.* *<u>Overheating</u>* *Prior to the above ground commencement of the development, an updated Overheating Report shall be submitted to and approved by the Local Planning Authority. The submission shall assess the overheating risk, confirm the mitigation measures, and propose a retrofit plan. This assessment shall be based on the Energy and Sustainability Assessment rev 1 by EAL Consult (date Oct 2024) as a starting point, taking into account the outstanding requirements at application stage.* *This report shall include:* - *Revised and further modelling of units modelled based on CIBSE TM52 and TM59, using the CIBSE TM49 London Weather Centre files for the DSY1-3 (2020s) and DSY1 2050s and 2080s, high emissions, 50% percentile with openable and closed window scenarios;*	

	- *Demonstrating the mandatory pass for DSY1 2020s can be achieved following the Cooling Hierarchy and in compliance with Building Regulations Part O, demonstrating that any risk of crime, noise and air quality issues are mitigated appropriately evidenced by the proposed location and specification of measures by following the Cooling Hierarchy;* - *Modelling of mitigation measures required to pass current and future weather files, clearly setting out which measures will be delivered before occupation and which measures will form part of the retrofit plan;* - *Confirmation that the retrofit measures can be integrated within the design (e.g., if there is space for pipework to allow the retrofitting of cooling and ventilation equipment), setting out mitigation measures in line with the Cooling Hierarchy;* - *Confirmation who will be responsible to mitigate the overheating risk once the development is occupied.* *(b) Prior to occupation of the development, details of internal blinds to all habitable rooms and any external shading (if applicable) must be submitted for approval by the local planning authority. This should include the fixing mechanism, specification of the blinds, shading coefficient, etc. Occupiers must retain internal blinds for the lifetime of the development, or replace the blinds with equivalent or better shading coefficient specifications.* *(c) Prior to occupation, the development must be built in accordance with the overheating measures as approved in part (a) and retained thereafter for the lifetime of the development:* - *Openable windows;* - *Fixed internal blinds with white backing;* - *Window g-values of 0.5 or better;* - *Mechanical ventilation (4ach) to bedroom windows facing Bedford Road;* - *Hot water pipes insulated to high standards.* - *Any further mitigation measures as approved by or superseded by the latest approved Overheating Strategy.* *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.*	

	<u>Sustainability Strategy</u> *Prior to above ground commencement of development, details of the sustainability strategy shall be submitted to and approved by the Local Planning Authority. This shall include specifications, plans and sections that demonstrate sustainable design, layout, construction techniques and proposed measures to improve the sustainability of the scheme including but not limited to sustainable transport, health and wellbeing, reduction of material use and waste, water consumption, and flood risk, drainage improvements, and biodiversity enhancement.* *The report shall include:* - *Urban greening and biodiversity enhancement measures;* - *Details on cycle parking facilities;* - *A target percentage for responsibly sourced, low-impact materials used during construction;* - *Justification for the demolition of the existing buildings in terms of its impact on the whole life carbon of the development and the circular economy principles;* - *Details on how surface water runoff will be reduced and overall sustainable drainage strategy;* - *Climate Change mitigation measures to be considered for the external spaces and the impact of the increase in severity and frequency of weather events on the building structures.* *Reason: To ensure the development provides the maximum provision towards increasing the level of sustainability in line with London Plan (2021) policies G6, SI7 and Haringey Local Plan Policy SP4, DM21, DM25, and DM29.* *<u>Living roofs and walls</u>* *(a) Prior to the above ground commencement of development, details of the living roofs and living wall must be submitted to and approved in writing by the Local Planning Authority. Living roofs must be planted with flowering species that provide amenity and biodiversity value at different times of year. Plants must be grown and sourced from the UK and all soils and compost used must be peat-free, to reduce the impact on climate change. The submission shall include:* *i) A roof plan and relevant floor plan identifying where the living roofs will be located; and a ground floor plan identifying where the living walls will be rooted in the ground;* *ii) A section demonstrating settled substrate levels of no less than 120mm for extensive living roofs (varying depths of 120-180mm), and no less than 250mm for intensive living roofs (including planters on amenity roof terraces);*	

	iii) Roof plans annotating details of the substrate: showing at least two substrate types across the roofs, annotating contours of the varying depths of substrate *iv) Details of the proposed type of invertebrate habitat structures with a minimum of one feature per 30m^2 of living roof: substrate mounds and 0.5m high sandy piles in areas with the greatest structural support to provide a variation in habitat; semi-buried log piles / flat stones for invertebrates with a minimum footprint of 1m^2, rope coils, pebble mounds of water trays;* *v) Details on the range and seed spread of native species of (wild)flowers and herbs (minimum 10g/m^2) and density of plug plants planted (minimum 20/m^2 with root ball of plugs 25cm^3) to benefit native wildlife, suitable for the amount of direct sunshine/shading of the different living roof spaces. The living roofs will not rely on one species of plant life such as Sedum (which are not native);* *vi) Roof plans and sections showing the relationship between the living roof areas and photovoltaic array; and* *vii) Management and maintenance plan, including frequency of watering arrangements.* *(b) Prior to the occupation of 90% of the dwellings, evidence must be submitted to and approved by the Local Planning Authority that the living roofs have been delivered in line with the details set out in point (a). This evidence shall include photographs demonstrating the measured depth of substrate, planting and biodiversity measures. If the Local Planning Authority finds that the living roofs have not been delivered to the approved standards, the applicant shall rectify this to ensure it complies with the condition. The living roofs shall be retained thereafter for the lifetime of the development in accordance with the approved management arrangements.* *Reason: To ensure that the development provides the maximum provision towards the creation of habitats for biodiversity and supports the water retention on site during rainfall. In accordance with London Plan (2021) Policies G1, G5, G6, SI1 and SI2 and Local Plan (2017) Policies SP4, SP5, SP11 and SP13.* *<u>Biodiversity measures</u>* *(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. This assessment shall be based on the Biodiversity Net Gain Assessment by Arbtech (dated 11/04/24) achieving a net gain of 100% on site.*	

	(b) Prior to the occupation of development, photographic evidence and a post-development ecological field survey and impact assessment shall be submitted to and approved by the Local Planning Authority to demonstrate the delivery of the ecological enhancement and protection measures is in accordance with the approved measures and in accordance with CIEEM standards. *Development shall accord with the details as approved and retained for the lifetime of the development.* *Reason: To ensure that the development provides the maximum provision towards the creation of habitats for biodiversity and the mitigation and adaptation of climate change. In accordance with London Plan (2021) Policies G1, G5, G6, SI1 and SI2 and Local Plan (2017) Policies SP4, SP5, SP11 and SP13.* *<u>Urban greening factor</u>* *Prior to completion of the construction work, an Urban Greening Factor calculation should be submitted to and approved by the Local Planning Authority demonstrating a target factor of 0.4 has been met through greening measures.* *Reason: To ensure that the development provides the maximum provision towards the urban greening of the local environment, creation of habitats for biodiversity and the mitigation and adaptation of climate change. In accordance with London Plan (2021) Policies G1, G5, G6, SI1 and SI2 and Local Plan (2017) Policies SP4, SP5, SP11 and SP13.* *<u>BREEAM</u>* *a) Prior to commencement on site for the relevant non-residential unit, a Design Stage Assessment and evidence that the relevant information has been submitted to the BRE for a design stage accreditation certificate must be submitted to the Local Planning Authority confirming that the development will achieve a BREEAM "Excellent" outcome (or equivalent), aiming for "Outstanding". This should be accompanied by a tracker demonstrating which credits are being targeted, and why other credits cannot be met on site.* *b) Within 6 months of commencement on site, the Design Stage Accreditation Certificate must be submitted. 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.*	

	c) Prior to occupation, the Post-Construction Stage Assessment and tool, and evidence that this has been submitted to BRE should be submitted for approval, confirming that the development has achieved a BREEAM "Excellent" outcome (or equivalent), subject to certification by BRE. *d) Within 6 months of occupation, the Post-Construction certificate issued by the Building Research Establishment must be submitted to the local authority for approval, confirming this standard has been achieved.* *In the event that the development fails to achieve the agreed rating for the development, a full schedule and costings of remedial works required to achieve this rating shall be submitted for our written approval with 2 months of the submission of the post construction certificate. Thereafter the schedule of remedial works must be implemented on site within 3 months of the Local Authority's approval of the schedule, or the full costs and management fees given to the Council for offsite remedial actions.* *Reason: In the interest of addressing climate change and securing sustainable development in accordance with London Plan (2021) Policies SI2, SI3 and SI4, and Local Plan (2017) Policies SP4 and DM21.* Carbon Management Response 28/04/2025 In preparing this consultation response, we have reviewed: • Energy and Sustainability Assessment rev 3 prepared by EAL Consult (date Feb 2025) - including an updated Overheating Assessment in the appendix • GLA Carbon Emissions Reporting Spreadsheet rev 2.xlsx • GLA Be Seen Spreadsheet rev 1.xlsm • TM54 Operational Energy Assessment rev 1 by AJIBS Design UK Limited (dated 10 Feb 2025) Summary The overall reduction of carbon dioxide emissions on site has not changed from the previous revision, it achieves a reduction of 82%, which is supported in principle. This response details the clarifications and changes. Planning conditions have been revised to reflect the proposed changes to secure the benefits of the scheme. Energy Strategy	

The applicant has revised the energy modelling of the commercial units at Be Lean stage using the corrected heating system, therefore the distribution of carbon reductions across Be Lean and Be Green stages for the commercial units have been changed.

There is no change to the carbon reduction for the residential units, and the overall site-wide carbon reduction has also not changed.

Amendments in blue:

Site-wide (SAP10.2 emission factors)			
	Total regulated emissions (Tonnes CO_2 / year)	**CO_2 savings (Tonnes CO_2 / year)**	**Percentage savings (%)**
Part L 2021 baseline	12.0		
Be Lean	9.0	2.9	24%
Be Clean	9.0	0	0%
Be Green	2.2	6.8	57%
Cumulative savings		9.8	82%
Carbon shortfall to offset (tCO_2)	2.2		
Carbon offset contribution	£95 x 30 years x 2.2 tCO_2/year = £6,288		
10% management fee	£628		

Amendments in blue:

	Residential			**Non-residential**		
(SAP10.2 emission factors)	**Total regulated emissions**	**CO_2 savings (tCO_2 / year)**	**Percentage savings (%)**	**Total regulated emissions**	**CO_2 savings (tCO_2/ year)**	**Percentage savings (%)**

	(tCO_2/ year)			(tCO_2/ year)		
Part L 2021 Baseline	10.7			1.3		
Be Lean savings	7.9	2.8	26%	1.1	0.2	12%
Be Clean savings	7.9	0	0%	1.1	0	0%
Be Green savings	1.5	6.4	60%	0.7	0.4	33%
Cumulative savings		9.2	86%		0.6	45%
Carbon shortfall to offset (tCO_2)	1.5			0.7		

Energy Use Intensity (EUI) / Space Heating Demand (SHD)
The applicant has revised their incorrect EUIs and SHDs in their previous ES to the following:

	Proposed Development	GLA Benchmark
Building type	Residential	Residential
EUI	103.05 kWh/m^2/year	Does not meet GLA benchmark of 35 kWh/m^2/year
SHD	9.21 kWh/m^2/year	Meets GLA benchmark of 15 kWh/m^2/year
Methodology used	Part L1 SAP 10.2	

	Proposed Development	GLA Benchmark
Building type	Commercial	All other non-residential
EUI	182.75 kWh/m^2/year	Does not meet benchmark of 55 kWh/m^2/year

SHD	21.61 kWh/m^2/year	Meets GLA benchmark of 15 kWh/m^2/year
Methodology used	Part L2 SBEM	

<u>Actions:</u>

- Both the EUIs and SHDs of the residential units and the commercial units have been revised, but the EUIs are still very high. Potentially they are still not being modelled correctly, applicant to clarify why the EUIs are so high.

Energy – Lean

Residential:
The applicant has confirmed Waste Water Heat Recovering (WWHR) will now be included as part of the proposal to align with the energy modelling which has included WWHR.

Commercial:
The applicant has corrected the energy modelling at Be Lean stage using the proposed building system with an efficiency of 3.0.

<u>Actions:</u>

- As noted in the previous comment, the BRUKL worksheet has shown the floor U-value has been modelled as 0.13 W/m^{2}K instead of 0.18 W/m^{2}K as stated in ES. The applicant has now remodelled with a floor U-value of 0.10 W/m^{2}K, however this has not corrected the inconsistency. Applicant should align the energy modelling with the proposed efficiency of the building fabric.

Energy – Green

The applicant has proposed to apportion some of the PV array to the commercial to maximize the use of electricity generated during the daytime. This is supported.

Total solar array peak output	11.16 kWp
Apportioned to the residential units	9.16 kWp

Apportioned to the commercial units	2 kWp

Energy – Be Seen

The applicant has updated the GLA Be Seen Spreadsheet to match with the current design proposal.

Carbon Offset Contribution

There is no change from the previous revision. A carbon shortfall of 2.2 tCO_2/year remains. The remaining carbon emissions will need to be offset at £95/tCO_2 over 30 years plus 10% management fee.

Overheating

The OH report has been corrected to model scenarios following the cooling hierarchy, and internal blinds are no longer modelled despite being proposed as they cannot be used to comply with the overheating criteria.

Residential:

The revised scenarios and their subsequent results are as follows:

DSY 1 2020s	Criteria A	Criteria B
Scenario 1: (Unconstrained) with openable windows and passive mitigation measures	All pass	All pass
Scenario 2: (Constrained) Policy-compliant with bedroom windows closed at night and background ventilation only to LKD.	All fail	All fail
Scenario 3: Scenario 2 + external shading (brise soleil)	All fail*	All fail
Scenario 4: Scenario 3 + mechanical cooling	All pass	All pass

** The overheating result in Scenario 3 has improved from Scenario 2 with the incorporation of external shading, the results of some first floor units just marginally over the threshold of criteria A.*

Commercial:
The report has modelled the following scenarios:
Scenario 1: Without active cooling
Scenario 3: With active cooling

All rooms pass all three criteria using DSY 1 2020s and DSY 2 2050s weather files, but all two commercial units fail to meet the requirement at the 2080s scenario (DSY 3).

Residential	Commercial
Proposed mitigation measures to pass the overheating requirements for 2020s DSY1: - Natural ventilation, with windows 100% openable facing Alexandra Park Road - Bedrooms facing Bedford Road: Windows closed with mechanical ventilation providing 4 air changes per hour - Living room facing Bedford Road: Ventilated by open windows but provided with background ventilation with acoustic vents. - External horizontal louvres / brise soleils above windows to the East façade - External green walls to the west façade (not modelled) - Projecting balconies from the floor above to the south facade - Mechanical cooling (no details) - Internal blinds (This is not included in the modelling)	Proposed mitigation measures: - Retractable awnings; - Non-openable windows, mechanical ventilation (no details). - Active cooling (no details).
A future retrofit plan has been proposed with the following measures: - Further improvements to external shading - Use of higher-performance glazing - Additional passive ventilation measures	

<u>Actions:</u>

	- No details of the mechanical cooling for the residential units and commercial units have been provided. This will be conditioned. - Applicant should explore the potential to increase the projection of the external solar shading to minimise the cooling demand of the development. Planning Obligations Heads of Terms - Be Seen commitment to uploading energy data - Energy Plan - Sustainability Review - Estimated carbon offset contribution (and associated obligations) of £6,288 (indicative), plus a 10% management fee; carbon offset contribution to be re-calculated at £2,850 per tCO2 at the Energy Plan and Sustainability stages. Planning Conditions The following conditions have been revised to secure the benefits of the scheme. **Only the revised conditions have been included below (changes marked in red/bold), for the rest of conditions without changes please refer to our previous comments.** *Energy Strategy* *The development hereby approved shall be constructed in accordance with the Energy and Sustainability Assessment **rev 3 by EAL** Consult (dated **Feb 2025**) delivering a minimum 82% improvement on carbon emissions over 2021 Building Regulations Part L, with high fabric efficiencies, communal air source heat pumps (ASHPs) and a minimum 11.16 kWp solar photovoltaic (PV) array.* *(a) Prior to above ground construction, details of the Energy Strategy shall be submitted to and approved by the Local Planning Authority. This must include:* - *Confirmation of how this development will meet the zero-carbon policy requirement in line with the Energy Hierarchy;* - *Confirmation of the necessary fabric efficiencies to achieve a minimum **24%** reduction;* - ***Specification of the waste water heat recovery system, and the layout of the pipework;*** - *Details to reduce thermal bridging including the parapet and terrace junctions;*	

	- *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* ***centralised plant, interface units in flats****, pipework and noise and visual mitigation measures;* - *Specification and efficiency of the proposed Mechanical Ventilation and Heat Recovery (MVHR), with plans showing the rigid MVHR ducting and location of the unit;* - *Details of the PV, demonstrating the roof area has been maximised, with the following details: a roof plan; the number, angle, orientation, type, and efficiency level of the PVs; how overheating of the panels will be minimised; their peak output (kWp) and annual energy generation (kWh/year); inverter capacity; and how the energy will be used on-site before exporting to the grid;* - *Specification of any additional equipment installed to reduce carbon emissions, if relevant;* - *A metering strategy.* *The development shall be carried out strictly in accordance with the details so approved prior to first operation and shall be maintained and retained for the lifetime of the development.* *(b) The solar PV arrays/air source heat pumps must be installed and brought into use prior to first occupation of the relevant block. Six months following the first occupation of that block, evidence that the solar PV arrays have been installed correctly and are operational shall be submitted to and approved by the Local Planning Authority, including photographs of the solar array, installer confirmation, an energy generation statement for the period that the solar PV array has been installed, and a Microgeneration Certification Scheme certificate. The solar PV array shall be installed with monitoring equipment prior to completion and shall be maintained at least annually thereafter.* *(c) Within six months of first occupation, evidence shall be submitted to the Local Planning Authority that the development has been registered on the GLA's Be Seen energy monitoring platform.* *Reason: To ensure the development reduces its impact on climate change by reducing carbon emissions on site in compliance with the Energy Hierarchy, and in line with London Plan (2021) Policy SI2, and Local Plan (2017) Policies SP4 and DM22.* *<u>Overheating</u>* *Prior to the above ground commencement of the development, an updated Overheating Report shall be submitted to and approved by the Local Planning Authority. The submission shall assess the overheating risk, confirm the mitigation measures, and propose a retrofit plan. This assessment shall be based on the*	

	*Energy and Sustainability Assessment rev **3** by EAL Consult (**dated Feb 2025**) **and passive mitigation measures as a minimum should include brise soleils and retractable awnings in accordance with 1544/07 rev A Elevations as proposed by CG Architects (dated Mar 2024).*** *This report shall include:* - *Revised and further modelling of units modelled based on CIBSE TM52 and TM59, using the CIBSE TM49 London Weather Centre files for the DSY1-3 (2020s) and DSY1 2050s and 2080s, high emissions, 50% percentile with openable and closed window scenarios;* - *Demonstrating the mandatory pass for DSY1 2020s can be achieved following the Cooling Hierarchy and in compliance with Building Regulations Part O, demonstrating that any risk of crime, noise and air quality issues are mitigated appropriately evidenced by the proposed location and specification of measures by following the Cooling Hierarchy;* - *Modelling of mitigation measures required to pass current and future weather files, clearly setting out **how the proposed mechanical cooling demand will be reduced, and** which measures will be delivered before occupation and which measures will form part of the retrofit plan;* - ***Details of the external brise soleils and retractable awnings in accordance with 1544/07 rev A Elevations as proposed by CG Architects (dated Mar 2024); drawings should include dimensions and specifications of the brise soleils and retractable awnings;*** - ***Details of internal blinds to all habitable rooms, including the fixing mechanism, specification of the blinds, shading coefficient;*** - ***Details of mechanical cooling for the residential and commercial units, including the active cooling demand on an area-weighted average in MJ/m2 and MY/year, specifications and efficiency of the equipment.*** - *Confirmation that the retrofit measures can be integrated within the design (e.g., if there is space for pipework to allow the retrofitting of cooling and ventilation equipment), setting out mitigation measures in line with the Cooling Hierarchy;* - *Confirmation who will be responsible to mitigate the overheating risk once the development is occupied.* *(**b**) Prior to occupation, the development must be built in accordance with the overheating measures as approved in part (a) and retained thereafter for the lifetime of the development:* - *Openable windows;* - ***External shading / brise soleil;***	

	- ***Retractable awnings (for the commercial units);*** - *Fixed internal blinds with white backing;* - *Window g-values of 0.5 or better;* - *Mechanical ventilation (4ach) to bedroom windows facing Bedford Road;* - ***Background ventilation with acoustic vents to living rooms facing Bedford Road;*** - *Hot water pipes insulated to high standards.* - *Any further mitigation measures as approved by or superseded by the latest approved Overheating Strategy.* *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.*	
Flood and Water Management	Comments dated 06/08/2024 Thank you for consulting us on the above planning application refence HGY/2023/2584 for the Demolition of the existing building and the erection of a new mixed-use development up to five storeys high with commercial uses (Use Class E) at ground level, 13no. self-contained flats (Use Class C3) to upper levels and plant room at basement level. Provision of cycle parking, refuse, recycling and storage. Lift overrun and pv panels at roof level at 13 Bedford Road, Wood Green, London, N22 7AU. Having reviewed the applicant's submitted Flood Risk Assessment Document reference number 79540.01.01R1dated 14th February 2024 and Sustainable Drainage Assessment Report reference number 79540.03.01R1 dated 14th February 2024 as prepared by Geo Smart Information Limited, we have following observation to make : 1) As a part of the Full planning application, we would require Full Calculation of the drainage system with Network Diagram cross referencing each drainage elements and also confirming a full range of rainfall data for each return period for 7 days 24 hours provided by Micro drainage modelling or similar simulating storms through the drainage system, with results of critical storms, demonstrating that there is no surcharging of the system for the 1 in 1 year storm, no flooding of the site for 1 in 30 year storm and that any above ground flooding for 1 in 100 year storm is limited to areas designated and	Comments noted Conditions included

	safe to flood, away from sensitive infrastructure or buildings. These storms should also include an allowance for climate change. 2) An evidence from the Thames Water confirming that the site has an agreed rate and point of discharge. 3) Any overland flows as generated by the scheme will need to be directed to follow the path that overland flows currently follow. A diagrammatic indication of these routes on plan demonstrating that these flow paths would not pose a risk to properties and vulnerable development Comments dated 25/08/2024 Conditions with regards to Surface Water Drainage and Management /Maintenance are fine by me. Comments dated 17/07/2025 Please see below our revised response with condition as requested: Having reviewed the applicant's submitted Flood Risk Assessment Document reference number 79540.01.01R1dated 14th February 2024 and Sustainable Drainage Assessment Report reference number 79540.03.01R1 dated 14th February 2024 as prepared by Geo Smart Information Limited, we find that the submission still does not fully address our previous requests and comments outlined in our email. However, given your request, time constraint and taking the application to the planning committee, we are prepared to recommend an approval of this planning application, with the following planning conditions to be implemented: Surface Water Drainage condition No development shall take place until a detailed Surface Water Drainage scheme for site has been submitted and approved in writing by the Local Planning Authority. The detailed drainage scheme shall demonstrate: 1) As a part of the Discharge of condition application, we would require Full Calculation of the drainage system with Network Diagram cross referencing each drainage elements and also confirming a full range of rainfall data for each return period for 7 days 24 hours provided by Micro drainage modelling or similar simulating storms through the drainage system, with results of critical storms, demonstrating that there is no surcharging of the system for the 1 in 1 year storm, no flooding of the site for 1 in 30 year storm and that any above ground flooding for 1 in 100 year storm is limited to areas designated and safe to flood, away	

	from sensitive infrastructure or buildings. These storms should also include an allowance for climate change. 2) An evidence from Thames Water confirming that the site has an agreed rate and point of discharge. 3) Any overland flows generated by the scheme to be directed to follow the path that overland flows currently follow. A diagrammatic indication of these routes on plan demonstrating that these flow paths would not pose a risk to properties and vulnerable development Reason : To endure that the principles of Sustainable Drainage are incorporated into this proposal and maintained thereafter. Management and Maintenance condition Prior to occupation of the development hereby approved, a detailed management maintenance plan for the lifetime of the development, which shall include arrangements for adoption by an appropriate public body or statutory undertaker, management by Residents management company or other arrangements to secure the operation of the drainage scheme throughout the lifetime of the development. The Management Maintenance Schedule shall be constructed in accordance with the approved details and thereafter retained. Reason: To prevent increased risk of flooding to improve water quality and amenity to ensure future maintenance of the surface water drainage system	
Trees	Comments dated 03/09/2024 From an arboricultural point of view, I hold no initial concerns. No arboricultural report has been submitted as there appears to be significant trees on the site. However, there appears to be a Lime street trees within the vicinity and an adjacent young mature Pine tree at 357 Alexandra Park Road N22.	Comments noted Condition included

	We will need assurances that these trees are adequately protected and that the root protection areas are not compromised. Applicants response dated 04/09/2024 The two trees referred to by the tree officer are shown in the image below. The pine tree seems to be remote to our development and I don't believe its root system is in any way affected by our development as our foundation level is considerably lower. The Lime tree is in the footpath and it appears to be the only tree that could potentially be affected the development. Saying that, there is an existing retaining wall between the footpath and the site forming the side wall of the existing building at the junction of Bedford Road and Alexandra Park Road. Hence, there should be no tree roots penetrating into the site. How do you want us to proceed with this?	

	  Officers comment dated 08/07/2025 They will need to confirm that the root protections areas are not affected and as such will require a tree report.	
Waste Management	Comments dated 01/08/2024 Thank you for giving Haringey's waste team the opportunity to comment on this planning application for the demolition of the existing building and the erection of a new mixed-use development up to five storeys high with commercial uses (Use Class E) at ground level.	Comments noted The Delivery and Servicing Plan condition will address

	The waste and dry recycling container provision for the residential flats is acceptable but there should also be containers for food waste. We would advise 2 x 140 litre wheelie bins to meet this requirement. The manoeuvrability of containers looks constrained with the current layout. Different crews and vehicles are used for collecting the different materials and it does not look possible to easily move the containers to the collection point without having to move them all which isn't acceptable operationally. (see point c in our guidance below) We do not have guidance relating to commercial waste and the businesses can use the Councils contractor or a private waste collector. We would ask that whoever is employed, is a registered waste carrier, complying with the waste duty of care code of practice and can produce the relevant documentation if requested. Having a commercial arrangement allows flexibility so that collections can be increased/ decreased depending on the amount of waste generated. However we would advise against sizing of the bins store and number of bins based on minimum size/number and maximum collections. The store should be sufficient space to store waste for at least 4 days. For reference please note the following information from our guidance concerning bin storage areas • The route from waste storage points to collection point must be as straight as possible with no kerbs or steps. Gradients should be no greater than 1:20 and surfaces must be smooth, flat and of solid construction such as concrete. Dropped kerbs must be installed as necessary for bulk bins. • If access through security gates/doors is required, digital keypad locks are the preferred method. Bin storage areas must also: a) be large enough to fit as many containers as are necessary to facilitate once per week collection. b) if with ceilings, have roof heights sufficient to allow residents to freely stand up inside while fully opening/closing bin lids c) have internal layouts that allow all containers to be accessed by users. Any one container must be able to be safely and easily removed from/put back to its original location within the bin store without the need to move other waste containers. d) have all doors and pathways 200mm wider than any bins that are required to pass through or over them. e) have the necessary lighting to facilitate safe usage for residents and collection crews. f) be constructed for ease of cleaning e.g. non-porous and smooth walls/floors with suitable drainage. h) incorporate appropriate measures to prevent: i. any damage to parked vehicles and property during manoeuvring of bins within and to/from the collection vehicle, ii. any obstructions, including illegal parking, inhibiting collection operations iii. fire and anti-social behaviour.	waste collection concerns

	Applicants response dated 09/07/2025 The route from waste storage points to collection point must be as straight as possible with no kerbs or steps. Gradients should be no greater than 1:20 and surfaces must be smooth, flat and of solid construction such as concrete. Dropped kerbs must be installed as necessary for bulk bins. – The route from waste storage to collection point is straight and direct. There are no kerbs or gradients and there is a level threshold. The floor is of concrete construction with adequate drainage and washing facilities. • If access through security gates/doors is required, digital keypad locks are the preferred method. – a digital keypad lock will be installed. Bin storage areas must also: a) be large enough to fit as many containers as are necessary to facilitate once per week collection. – the bin store can accommodate the requisite containers. b) if with ceilings, have roof heights sufficient to allow residents to freely stand up inside while fully opening/closing bin lids – there are no height restrictions. c) have internal layouts that allow all containers to be accessed by users. Any one container must be able to be safely and easily removed from/put back to its original location within the bin store without the need to move other waste containers. – the layout allows uninterrupted manoeuvring of containers. d) have all doors and pathways 200mm wider than any bins that are required to pass through or over them. – the door widths are adequate to allow uninterrupted manoeuvring of containers. e) have the necessary lighting to facilitate safe usage for residents and collection crews. – the bin stores will be adequately lit. f) be constructed for ease of cleaning e.g. non-porous and smooth walls/floors with suitable drainage. – The floor is of concrete construction and non-porous. Similarly, the walls will be non-porous. Adequate drainage and washing facilities will be installed. h) incorporate appropriate measures to prevent: i. any damage to parked vehicles and property during manoeuvering of bins within and to/from the collection vehicle, – Not applicable, bin store opens out directly to pavement.. ii. any obstructions, including illegal parking, inhibiting collection operations– Not applicable, bin store opens out directly to pavement. iii. fire and anti-social behaviour. – Not applicable, bin store is secure. Waste comments dated 11/07/2025	

	You can take this email as confirmation that Waste Services are satisfied with the responded comments to our guidance and have no further comments to add.	
Private sector Housing	The only comment for this one is that if any of the flats are rented they will need either selective or HMO licences depending on the number of occupants.	Comments noted
Building Control	The proposed fire statement for the development at the above site appears satisfactory, but will be subject to a full check under the Building Regulations 2010 (as amended) when a Building Control application is submitted to this office for checking.	Comments noted
Building Control	My concerns with the one submitted for the above development is that it has not also been assessed by a structural engineer with regards to the impact on adjacent building. Also, their assumption that the foundation depth will be 0.5m is concerning as a development such is this is very likely to be piled. Finally, the site is on an old garage/petrol station and there is no mention of contamination in the report. Applicant's response to Building Control comments 1. A full structural scheme will be undertaken at the technical design stage will then be issued to building control for their approval. 2. We agree that the scheme will be piled. No one expects anything different for a building of this size and position. Again, the piling design will be undertaken and issued to building control for their approval. 3. Likewise, the retaining walls will be designed and issued to building control for their approval. 4. We are all aware that this was previously a petrol station, and we know that a contamination report and remediation strategy will be required. This was agreed to be conditioned.	Comments noted. A detailed/comprehensive Basement Impact Assessment will address Building Controls Concerns
EXTERNAL		
Thames Water	Waste Comments 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	Comments noted conditions and Informatives included

	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 There are public sewers crossing or close to your development. If you're planning significant work near our sewers, it's important that you minimize the risk of damage. We'll need to check that your development doesn't limit repair or maintenance activities, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes 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 a strategic sewer. Thames Water requests the following condition to be added to any planning permission. "No piling shall take place until a PILING METHOD STATEMENT (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) and piling layout plan including all Thames Water wastewater assets, the local topography and clearance between the face of the pile to the face of a pipe has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement and piling layout plan. Reason: The proposed works will be in close proximity to	

	underground sewerage utility infrastructure. Piling has the potential to significantly impact / cause failure of local underground sewerage utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB 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. Thames Water would recommend that petrol / oil interceptors be fitted in all car parking/washing/repair facilities. Failure to enforce the effective use of petrol / oil interceptors could result in oil-polluted discharges entering local watercourses. Water Comments The applicant is advised that their development boundary falls within a Source Protection Zone for groundwater abstraction. These zones may be at particular risk from polluting activities on or below the land surface. To prevent pollution, the Environment Agency and Thames Water (or other local water undertaker) will use a tiered, risk-based approach to regulate activities that may impact groundwater resources. The applicant is encouraged to read the Environment Agency's approach to groundwater protection (available at https://www.gov.uk/government/publications/groundwater-protection-position-statements) and may wish to discuss the implication for their development with a suitably qualified environmental consultant. 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. The proposed development is located within 5m of a strategic water main. Thames Water do NOT permit the building over or construction within 5m, of strategic water mains. Thames Water request that the following condition be added to any planning permission. No construction shall take place within 5m of the water main. Information detailing how the developer intends to divert the asset / align the development, so as to prevent the potential for damage to subsurface potable water infrastructure, must be submitted to and approved in	

	writing by the local planning authority in consultation with Thames Water. Any construction must be undertaken in accordance with the terms of the approved information. Unrestricted access must be available at all times for the maintenance and repair of the asset during and after the construction works. Reason: The proposed works will be in close proximity to underground strategic water main, utility infrastructure. The works has the potential to impact on local underground water utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk. 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	
Transport for London	The site is located just outside of Crossrail 2 Safeguarding that have been made by the Secretary of State for Transport in order to protect the planned railway from conflicting development. As it stands this application has no material impact on the future delivery of Crossrail 2. The site is also adjacent to Alexander Palace railway station. The site is approximately 1km west of the A105, High Road this forms part of the Strategic Road Network (SRN), TfL has a duty under the Traffic Management Act 2004 to ensure that any development does not have an adverse impact on the SRN. The site has a Public Transport Accessibility Level (PTAL) of 5, on a scale of 1a-6b, 5 represents a very good level of accessibility. The site is approximately 300 metres from Cycleway 10. TfL have the following comments: • TfL are satisfied the proposed cycle parking for the site meets London Plan T5 requirements, whereby 23 long stay spaces and two short stay are provided for the residential aspect and two long stay and three short stay for the commercial use.	Comments noted conditions included Recommend legal agreement clauses and conditions will be included

	• TfL request that 5% of all spaces are designed to accommodate a larger / adapted cycle, in line with the London Cycle Design Standards (LCDS), for further guidance please see the attached link https://content.tfl.gov.uk/lcds-chapter8-cycleparking.pdf • The site is proposed to be car free, which given the PTAL of 5, is accepted by TfL. However TfL would prefer the applicant to provide one blue badge space from the outset, in line with T6.1, given the site is currently a car garage / car wash, there is no reason a space cannot be retained. With a space being provided onsite, the applicant should provide a Parking Design and Management Plan. The applicant details that there are some parking bays directly outside of the site, if the applicant can demonstrate that parking onsite is not feasible. • TfL welcome that an Outline Travel Plan is submitted with the Transport Statement. • The Trip Generation for the site was undertaken using TRICS database, which is welcomed by TfL. For the residential aspect, the site is said to generate 11 two way trips in the AM peak and eight two way trips in the PM peak. Regarding servicing trips, it is assumed 12 two way trips are to occur daily. Although no modal split is provided, is considered no mitigation is required. • Whilst no Heathy Streets Active Travel Zone Assessment (ATZ) is required, TfL would accept some proposals for public realm and footway improvements, especially for the foot bridge above the railway for Alexander Palace station, given this will be a key route for residents. The footbridge is quite narrow, so frequent cutting back on the trees would improve site lines and perception of safety when walking across the footbridge. • An Outline Construction Logistics Plan (CLP) has been provided and a detailed CLP will be issued and agreed prior to commencement of works. The main construction vehicle access is from Bedford Road, the vehicle routing must be agreed with LBH, as the highway authority for the network. • TfL welcome that the applicant is committed to meeting a minimum of Fleet Operator Recognition Scheme (FORS) silver, in line with Vision Zero. Construction vehicles and deliveries are to avoid peak school hours, which is welcomed by TfL. Subject to the above conditions being met, the proposal as it stands would not result in an unacceptable impact to the operations of the bus network on Bedford Road	

Designing Out Crime Officer	METROPOLITAN POLICE London Borough of Haringey Planning and Building Control 6th Floor River Park House 225 High Road Wood Green N22 8HQ Designing Out Crime Office Bow Road Police Station 111-117 Bow Road Tower Hamlets E3 2AN Email: ian.waylen@met.police.uk Dated: 23/08/2024 **Planning Case Officer :** Valerie Okeiyi **Our ref:** NE 8266 **Application Number:** HGY/2023/2584 **Location:** 13 Bedford Road, Wood Green, London, N22 7AU **Proposal:** Demolition of the existing building and the erection of a new mixed-use development up to five storeys high with commercial uses (Use Class E) at ground level, 12no. self-contained flats (Use Class C3) to upper levels and plant room at basement level. Provision of cycle parking, refuse, recycling and storage. Lift overrun, plant enclosure and pv panels at roof level Dear Haringey Planning, ***Section 1 - Introduction:*** Thank you for allowing us to comment on the above planning proposal. With reference to the above application we have had an opportunity to examine the details submitted and would like to offer the following comments, observations and recommendations. These are based on relevant information to this site (Please see Appendices), including my knowledge and experience as a Designing Out Crime Officer and as a Police Officer. It is in our professional opinion that crime prevention and community safety are material considerations because of the mixed use, complex design, layout and the sensitive location of the development. To ensure the delivery of a safer development in line with L.B. Haringey DMM4 and DMM5 (See Appendix), we have highlighted some of the main comments we have in relation to Crime Prevention (Appendices 1). I can confirm we have not met with the project design team to review Safety, Security or Crime Prevention. We have concerns around some aspects of the design and layout of the development. 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. We request that the developer contacts us at the earliest convenience to ensure that the development is designed to reduce crime at an early. Whilst in principle we have no objections to the site, 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.		Comments noted. Conditions/Informative included

There has been no consultation with our department or subsequent mention of how the development intends to prevent crime when complete. There is no mention of crime prevention or Secured by Design in the Design and Access Statement referencing design out crime.

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

Please provide my details to the applicant so we can discuss and address our concerns.

Section 2 - Secured by Design Conditions and Informative:

Should planning consent be granted for this application, we would request the following conditions and informative:

Conditions:

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.

Informative:

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

Section 3 - Conclusion:

We would ask that our department's interest in this planning application is noted and that we are advised of the final **Decision Notice**, with attention drawn to any changes within the development and subsequent Condition that has been implemented with crime prevention, security and community safety in mind.

Should the Planning Authority require clarification of any of the recommendations/comments given in the appendices please do not hesitate to contact us at the above office.

Yours sincerely,

Ian Waylen 1973CO

Designing Out Crime Officer
Metropolitan Police Service

This report gives recommendations. Please note that Crime Prevention Advice and the information in this report does not constitute legal or other professional advice; it is given free and without the intention of creating a contract or without the intention of accepting any legal responsibility. It is based on the information supplied and current crime trends in the area. All other applicable health, safety and fire regulations should be adhered to.

Appendix 1: Concerns and Comments

In summary we have overall site specific comments in relation to the following items. This list is not exhaustive and acts as initial observations based on the available plans from the architect and local authority planning portal.

Site specific advice may change depending on further information provided or site limitations as the project develops:

This list is not exhaustive and acts as concerns raised during consultation with the architects pre-application.

Site specific advice may change depending on further information or site limitations as the project develops:

To be utilised in further discussions with the appointed developer at a later stage.

Boundary Treatment

- Unfortunately this site does not provide any boundary treatment, but careful consideration is required to prevent potential climbing aides as outlined below.

Access Control

- Doorset preferred locking mechanism is Magnetic locks (Communal areas) - 2 x 500kg (minimum) resistance (1200lbs/psi) placed a third from the top and a third from the bottom
-
- Key fob access control with a data logging system is recommended as this is more efficient to deactivate/replace lost/stolen keys. It can also assist with identifying any misuse
- Data to be stored for one calendar month before being over written
- Access control panels to have audio/visual capability. Primary camera on panel to capture all visitors. They should achieve the Secured by Design required standard – UL293 (anti-vandal).
- **No** Trade Button on control panel.
- Emergency Exit (push to release) primary egress routes that are required to have an emergency escape mechanism should be self-resetting, shrouded and in best practice to be alarmed
- Plant/Service room door set/s accessible by public realm are required to be one of the following UKAS certified products:
  - LPS1175 issue 7 SR2 (or LPS 1175 Issue 8 B3) or
  - STS202 Issue 3:2011 BR 2+ or
  - LPS2081 SRB or Equivalent certification
- Consideration required regarding the security/risk management to Internet Of Things (IOT)

Note: Service/plant door/s should be self-closing, self-locking single doors.

ACB (Access Control Box) / Fire Access

- An external fire over ride switch (FOS) should be protected with the use of an accredited security product such as a Gerda Box. Consideration to other suppliers of this type of fire switch protection method should be given, check SbD web site.
  In addition to the use of an ACB see below re Premises Information Box (PIB).
  https://www.gerdasecurity.co.uk/access-control-protection-acb-gfs/
- Premises information box (PIB) typically used to store site specific documentation such as communal access routes, fire risers etc. PIB is generally located behind the primary security layer and is intended for LFB use only (Refer to current Homes guidance)
- If the cause and effect of a fire over ride switch (FOS) activation poses a crime risk consideration to a Drop Key Protection Box should be made
- The project fire consultant should be made aware of any Part B Security v's Safety conflicts.

Doors

- External communal door set/s should be flush with the building line to prevent any recesses. Any recesses should not exceed 600mm. Doorset/s should be certified to:
  - LPS1175 issue 7 SR2 (or LPS 1175 Issue 8 B3) or
  - STS202 Issue 3:2011 BR 2+ or
  - LPS2081 SRB or Equivalent certification Fabricator 3rd party UKAS certification
- We recommend that customer / communal entrances have a secure lobby area to provide adequate security for staff / customers. The secondary lobby door set/s that are required to be dual certified to the following minimum standards:
  - LPS1175 issue 7 SR2 (or LPS 1175 Issue 8 B3) or
  - STS202 Issue 3:2011 BR 2+ or
  - LPS2081 SRB or Equivalent certification Fabricator 3rd party UKAS certification
  - PAS24:2022 (Subject to crime risk assessment)
- Part B Fire resistance must be taken into Consideration for the door
- All locks are to be part of the accredited PAS24:2022 specification.

Note: Communal door/s should be self-closing, self-locking single doors

Windows

- All easily accessible windows (anything under 2m from another surface treatment) should be certificated to either:
  - PAS24:2022 with BS EN356:2000 min.P4A glazing
  - STS204 Issue 6:2022,
  - STS202 Issue 7:2016 Burglary Rating 1
  - LPS1175 Issue 7.2:2014 Security Rating 1 or
  - LPS1175 Issue 8:2018 A1 Security Rating 1 or
  - LPS 2081 Issue 1.1:2016 Security Rating A.

Accessible windows includes any glass reached by climbing any number of floors via rain water pipes, balconies or via communal walkways (whether walkway accessed through secure door or not)

- Any window within 2m of an accessible surface should have key operated locks
- Where windows form an escape route, Part B (Fire) compliance should be adhered to
- All ground floor, vulnerable and accessible windows must have a lockable window restrictor to prevent unauthorised access
- Where curtain walling systems are proposed these should be certificated to either:
  - LPS1175 SR2

- BS EN1627 RC3. **(With minimum of BS EN356:2000 P4A Glazing)**
- PAS24:2022 with BS EN356:2000 min. P2A glazing (consider P3A). Commercial windows to have a minimum of P4A glazing.

Note: Curtain wall systems are non-structural cladding systems for the external walls of buildings. Typically curtain wall systems comprise a lightweight aluminium frame onto which glazed or opaque infill panels can be fixed. These infill panels are often described as 'glazing' whether or not they are made of glass.

Refuse Storage

- Ideally should not allow access into the building from the refuse store
- Street access doors to be single leaf and either
  - LPS1175 SR2 or
  - STS202 BR2/B3
- Doors to be single leaf (available up to 1500mm that facilitate 1100cc bins in LPS and STS), self-closing and self-locking with access control, ideally using magnetic locks to the previous documented standard. (2 x 500kg resistance (1200lbs/psi) positioned 1/3 from the top and 1/3 from bottom)
- If louvre doors are used, these should be of robust construction (ideally steel) supported with a layer of steel mesh to the rear to prevent unauthorised access to the locking mechanism and prevent general misuse
- A suitable level of lighting to be present within store, ideally low level at times of inactivity and full level illumination when in use. To compliment any CCTV. External lighting to be Dusk to Dawn covering door set
- No external signage identifying the refuse store
- CCTV should cover the refuse store and avoid positions that would restrict coverage.

Note: Single leaf doors are available up to approx. 1500mm to and will facilitate 1100cc bins in LPS and STS. This will eliminate the weakness of the passive leaf manually operated locking system which leaves double doors more vulnerable.

Cycle storage

- Internal access doors to be ether:
  - LPS1175 issue 7 SR2 (or LPS 1175 Issue 8 B3) or
  - STS202 Issue 3:2011 BR 2+ or
  - LPS2081 SRB or Equivalent certification

  Must be single leaf, self-closing and self-locking with access control ideally using magnetic locks
- Cycle storage lighting is required in all stores. In areas of no natural light or hours of darkness, a constant level of lighting is required for illumination. Connected lighting to provide low level lighting during inactivity and higher light levels when motion is detected
- **No** external signage
- CCTV must be installed in cycle stores. Should have unhindered views of the racking at all times and should be vandal resistant
- There should be 3 locking points for cycles on the racks/stands provided. Cycle racking should be secured with anti-tamper fixings
- Cycle store doors should allow light spill from with-in, either a small obscured viewing panel or robust louvre (as part of the door set)
- Internal signage should ideally be placed inside the store to reinforce importance of securing cycles
- If timber storage/sheds are to be used, then these must be of robust construction and designed to the SbD guidance (Sec 64). Requires at least 2 points of locking on the main door. If items of value are to be stored within the shed then a security anchor

should be certificated to 'Sold Secure' Silver Standard LPS 1175 Issue 7.2:2014 Security Rating 1 or LPS 1175 Issue 8:2018 Security Rating A1

- Any Sheffield stands should be low level and shaped like the letter 'm', to deter people from sitting on them. The stands must be located in an area with good natural surveillance and tamper proof fixings used, to mitigate against theft or criminal damage.

CCTV / Alarm

- Any alarm installed should meet BS EN 50131 (as minimum)
- CCTV systems should conform to BS EN 62676: 2014 - video surveillance systems.
- CCTV should complement other security measures, not replace them. As a minimum police recommend coverage of the following areas:
  - Entrance & exit points including secondary coverage of call points
  - Foyer / Lobby areas
  - Post boxes and Postal rooms
  - Cycle stores
  - Refuse stores
  - Top of stair cores
- Image quality should be able to provide facial recognition and colour HD quality during daylight and night time
- CCTV housing to be anti-vandal and potentially shrouded. Signage highlighting use of CCTV should displayed throughout the development
- Footage should be preserved for a minimum of 31 days
- The footage must be of evidential values and stored for a minimum of 31 days. All footage to be time and date stamped and recorded in a format that is accessible to the local authority and police
- Any CCTV system that captures footage of public areas must comply with the regulations outlined by the Information Commissioner's Office
- To be stored securely on a remote cloud system, or on a locked and secured hard drive i.e. within a secure area behind a PAS24:2022 door or SR1 lockable steel cabinet
- Police access to footage must be within a minimum of 24 hours and a maximum of 48 hours for evidential purposes.

Postal Strategy

Mailboxes should be covered by CCTV and meet TS009 standards or MPS robust mailbox specification below:

- A minimum of 1.5mm thick galvanized steel construction. Its depth and width must allow mail to fall below the fishing plate unrestricted
- Fitted with a 3-point locking mechanism supported with a minimum five pin cam lock
- BS EN 1303:2005 (Inc corrigendum Aug 2009) compliant five/six pin camlock must have anti-drill, anti-bump and anti-pick lock attributes
- Gap restricting aperture (anti-fishing max 260mm x 40mm) The anti-fishing plate must be fabricated as part of the post box construction and extend into and across the full length of the letterbox opening to defend against the interference of mail, anti-leverage surrounding trim, welded claw on retrieval door to negate the ability to gain a leverage point and compromise the security of the mailbox
- Unit to have a minimum of 13Ltrs storage.

Lighting

- Public realm lighting whether adopted highways/footpaths/private estate roads or car parks should meet BS 5489:2020 standard

- Declaration of conformity should be overseen by an independent and competent lighting engineer. They should be qualified to at least ILP Level 3 or 4 in line with the latest SBD guidance. https://theilp.org.uk/
- Internal lighting Communal elements of any scheme, ideally should be a controlled by a photo electric sensor. This to ensure suitable levels of lighting at all times. Where no natural light is available two phased lighting can be used (low level for non-activity, higher level once movement is detected)
- Lux is the measurement of light reaching a surface (1 lux is the light emitted from one candle that is 1m away from a surface 1sqm). Examples of suitable Lux levels are listed below:
  - Office interior (security) 05 Lux
  - Private car parks 10 Lux
  - Exterior Rural location 10 Lux
  - Exterior Urban location 20 Lux
  - Walkways 30 Lux
  - Loading bays 50 Lux

  Further guidance is available in the "Lighting against crime" manual

- The even distribution of light across the area being illuminated. A good lighting system is one designed to distribute an appropriate amount of light evenly with uniformity and should include the following:
  - Values of between 0.25 and 0.40
  - Using lamps with a rating of at least 60 (minimum) on the Colour Rendering Index.
  - Good lighting will use energy efficient lamps in suitable luminaries
- Dusk-Till-Dawn lighting where possible should consist of white light which is evenly distributed. In communal areas all entrances should have dusk till dawn lighting supported via a photo electric cell. Allowing lighting to controlled automatically
- Bollard lighting **shall be avoided** due to its history of vandalism and ease of covering. Up lighters and decorative lighting can be used but only in unison with columns providing the required standards of light for good clear facial recognition illumination

Climbing Aids

- It is recommended that any climbing aids such as balconies, canopies, protruding brickwork/cladding etc., should not be positioned near any windows/doors and fixed flush with the building/boundary. This will mitigate against burglaries and domestic violence perpetrators.
- Canopies above entrances should be avoided to deter rough sleepers or the concealment of any perpetrators from misusing this area. If canopies are used then the depth must be below 600mm and they must be non-load bearing. If any canopy is robust enough to withstand a person standing on top, all nearby windows will be classed as vulnerable and therefore will be required to be PAS24 P2A.
- Any drain/rain pipes should ideally be internally installed. External drain/rain pipes should be of square design and sit flush against the building to prevent them being used as a climbing aid. They should be located away from any windows or balconies.

Roof Access

- AOV's should not be restricted from working, however can be reinforced potentially with fixed grille or railing (LPS 1175 SR1) to prevent unauthorised access
- Easily accessible roof lights should be a one of the following standards:
  - PAS24:2022 or
  - STS 204 (issue 6: 2016) or
  - LPS1175 (issue 7: 2014) SR1 or

- LPS1175 (issue 8: 2018) SR1 / A1 or
- STS202 (issue 7: 2016) BR1 or
- LPS2081 (issue 1.1: 2016) SR A

- If roof door access is required for "maintenance only" the door should be PAS24:2022 as a minimum. This door should be secured ideally with a key. However, access control can be used in conjunction with a recommended locking mechanism and must be restricted to maintenance staff only.

Note - There are further concerns that need to be discussed with the applicant.

Lithium Ion Battery Devices and Vehicles Disclaimer
This development / application has cycle storage facilities and / or areas that may require the charging and storage of Lithium-ion powered vehicles or devices, within the building or the wider site footprint. The developer or developer's agent must be aware that it is their responsibility to inform the Responsible Person(s), Fire and Rescue Service and Building Control of these storage facilities and areas, to ensure that the necessary fire suppression measures for the charging and storage of lithium-ion products have been considered and specified.

The LFB guidance on this matter can also be passed to partners who ask for additional guidance.

https://www.london-fire.gov.uk/media/8064/gn_103-charging-and-storage-for-electric-powered-personal-vehicles.pdf

Appendix 2: Planning Policy

London Plan 2021

Policy D11: Safety, Security and Resilience to Emergency
This policy links design out crime, counter terrorism prevention measures and acknowledges fire safety issues.

Section B of policy D11
Boroughs should work with their local Metropolitan Police Service 'Design Out Crime' officers and planning teams, whilst also working with other agencies such as the London Fire
Commissioner, the City of London Police and the British Transport Police to identify the community safety needs, policies and sites required for their area to support provision of necessary infrastructure to maintain a safe and secure environment and reduce the fear of crime. Policies and any site allocations, where locally justified, should be set out in
Development Plans.

Section C of policy D11
These measures should be considered at the start of the design process to ensure they are inclusive and aesthetically integrated into the development and the wider area.
The policy considers not just crime, but also a wide range of hazards, such as fire, flood, extreme weather and terrorism.
New buildings should therefore be **resilient** to all of these threats.

Paragraph 3.11.3
Measures to **design out crime**, including counter terrorism measures, should be integral to development proposals and considered early in the design process, taking into account the principles contained in guidance such as the Secured by Design Scheme published by the Police…. This will ensure development proposals provide adequate protection, do not compromise good design, do not shift vulnerabilities elsewhere, and are cost-effective. Development proposals should incorporate measures that are proportionate to the threat of the

risk of an attack and the likely consequences of one.

Paragraph 3.11.4
The Metropolitan Police (Designing Out Crime Officers and Counter Terrorism Security Advisors) should be consulted to ensure major developments contain appropriate design solutions, which mitigate the potential level of risk whilst ensuring the quality of places is maximised.

Paragraph 3.12.10
Fire safety and security measures should be considered in conjunction with one another, in particular to avoid potential conflicts between security measures and means of escape or access of the fire and rescue service. Early consultation between the London Fire Brigade and the Metropolitan Police Service can successfully resolve any such issues.

DMM4 (Policy DM2) Part A(d) "Have *regard to the principles set out in 'Secured by Design'*"

DMM5: Para 2.14 - "Proposals will be assessed against the principles of secured by design'. The latest published guidance in this respect should be referred."

An Independent Sustainability report by AECOM on Tottenham area action plan states: *"Crime is high in Tottenham with many residents concerned about safety, gang activity and high crime rates. Issues are particularly associated with Northumberland Park and Tottenham Hale".*

12.3 of same report states:

- Crime rates are relatively high across the borough and crime is particularly prevalent in Northumberland Park. There is a need to design schemes in order to reduce levels of crime, fear of crime and anti-social behavior. Since unemployment is strongly correlated with acquisitive crime, there may also be a link to wider economic development.
- There are no references to crime in the **overarching policies**, although it is recognised that housing and economic polices aim to support a very significant level of regeneration in the area. This could indirectly lead to reduced crime / fear of crime in the medium term through creating more high quality environments and more stable communities. **AAP 06** includes requirements on urban design and character and seeks to maximise opportunities to create legible neighbourhoods, which may assist in creating safe, modern and high quality places.
- There are no references to crime in the **neighbourhood area sections;** however they do set out key objectives which include considerations for safe and accessible environments. Furthermore, as noted above, the scale of regeneration proposed should indirectly lead to reductions in crime and fear of crime. Crime is particularly high in Northumberland Park and Tottenham Hale, hence this issue might be explicitly addressed in these sections; however, it is recognised that the DM Policies DPD includes Borough wide requirements in this regard. Also, AAP 06 sets out the Council's commitment to preparing Design Code Supplementary Planning Documents (SPDs) for Tottenham's Growth Areas, where opportunities for secure by design principles can be investigated.
- In **conclusion**, the plan is likely to result in positive effects on the crime baseline if there is large scale regeneration (including jobs growth) and robust implementation of safer streets and other measures to design out crime in Tottenham, including particularly in Northumberland Park where crime levels are highest.

The **Supplementary Planning Documents *'Designing Safer Places'*** and ***'Landscaping'*** provide further additional guidance supporting the recommendations.

- **Section 17 of the Crime and Disorder Act 1988** states "It shall be the duty of each Authority to which this section applies to exercise its various functions with due regard to the likely effect of the exercise of those functions on and the need to do all it reasonably can to prevent Crime and Disorder in its area", as clarified by PINS953.

- **The National Planning Policy Framework (NPPF)**

"Planning policies and decisions should aim to ensure that developments create: *Safe and accessible*

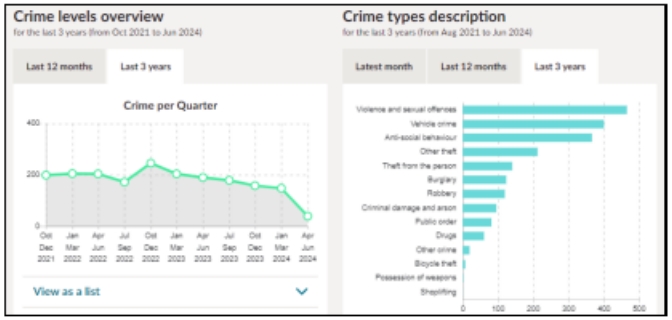
Appendix 3: Crime Figures

The crime figures provided below are publicly available on the Internet at http://www.met.police.uk/. The figures can at best be considered as indicative as they do not include the wide variety of calls for police assistance which do not result in a crime report. Many of these calls involve incidents of anti-social behaviour and disorder both of which have a negative impact on quality of life issues.

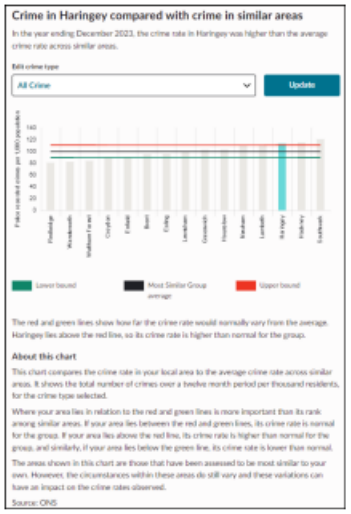
Haringey is one of 32 London Boroughs policed by the Metropolitan Police Service. It currently has crime figures above average for the London Boroughs and suffers from high levels of crime and disorder to its residents and business communities.

The following figures relate to recorded crime data from Police.uk for the below area:

Alexandra Park ward



The most commonly reported crimes on this ward during April 2024 are: Violence, Vehicle crime and Anti-Social behaviour. The crime levels over the last few months have remained at a similar level. These crime types are also the most commonly reported crimes over the last 36 months.

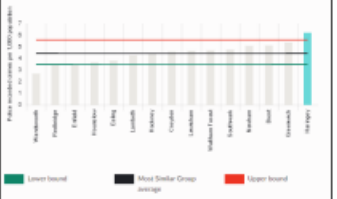


Crime in Haringey compared with crime in similar areas

In the year ending December 2023, the drug offence rate in Haringey was higher than the average drug offence rate across similar areas.

Edit crime type

Drugs | Update



The red and green lines show how far the drug offence rate would normally vary from the average. Haringey lies above the red line, so its drug offence rate is higher than normal for the group.

About this chart

This chart compares the crime rate in your local area to the average crime rate across similar areas. It shows the total number of crimes over a twelve month period per thousand residents, for the crime type selected.

Where your area lies in relation to the red and green lines is more important than its rank among similar areas. If your area lies between the red and green lines, its crime rate is normal for the group. If your area lies above the red line, its crime rate is higher than normal for the group, and similarly, if your area lies below the green line, its crime rate is lower than normal.

The areas shown in this chart are those that have been assessed to be most similar to your own. However, the circumstances within these areas do still vary and these variations can have an impact on the crime rates observed.

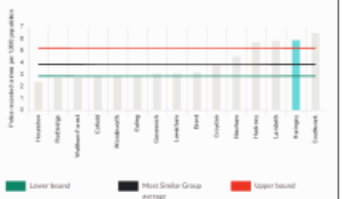
Source: ONS

Crime in Haringey compared with crime in similar areas

In the year ending December 2023, the robbery rate in Haringey was higher than the average robbery rate across similar areas.

Edit crime type

Robbery | Update



The red and green lines show how far the robbery rate would normally vary from the average. Haringey lies above the red line, so its robbery rate is higher than normal for the group.

About this chart

This chart compares the crime rate in your local area to the average crime rate across similar areas. It shows the total number of crimes over a twelve month period per thousand residents, for the crime type selected.

Where your area lies in relation to the red and green lines is more important than its rank among similar areas. If your area lies between the red and green lines, its crime rate is normal for the group. If your area lies above the red line, its crime rate is higher than normal for the group, and similarly, if your area lies below the green line, its crime rate is lower than normal.

The areas shown in this chart are those that have been assessed to be most similar to your own. However, the circumstances within these areas do still vary and these variations can have an impact on the crime rates observed.

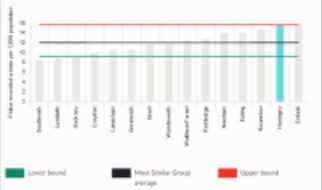
Source: ONS

Crime in Haringey compared with crime in similar areas

In the year ending December 2023, the vehicle crime rate in Haringey was about the same as the average vehicle crime rate across similar areas.

Edit crime type

Vehicle crime | Update



The red and green lines show how far the vehicle crime rate would normally vary from the average. Haringey lies between the red and green lines, so its vehicle crime rate is normal for the group.

About this chart

This chart compares the crime rate in your local area to the average crime rate across similar areas. It shows the total number of crimes over a twelve month period per thousand residents, for the crime type selected.

Where your area lies in relation to the red and green lines is more important than its rank among similar areas. If your area lies between the red and green lines, its crime rate is normal for the group. If your area lies above the red line, its crime rate is higher than normal for the group, and similarly, if your area lies below the green line, its crime rate is lower than normal.

The areas shown in this chart are those that have been assessed to be most similar to your own. However, the circumstances within these areas do still vary and these variations can have an impact on the crime rates observed.

Source: ONS

Crime changes over time in Haringey and in the Metropolitan Police force area

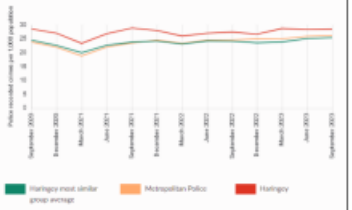
In the quarter ending September 2023, crime rates were:

- up in Haringey
- up in the Metropolitan Police force area

compared with the corresponding quarter in 2022.

Edit crime type

All Crime | Update



About this chart

This chart shows how crime rates in your local area and police force area have changed over time. It also shows how the average crime rates in similar areas to your local area have changed over time.

The chart shows the quarterly crimes per thousand residents, for the crime type selected, over a three year period. Note that some crime types have distinct seasonal patterns and this should be borne in mind when viewing the chart.

Source: ONS

- **Police.Uk provides open source crime data, please see the Home Office crime classifications below as depicted on the Police.uk web site keeping in mind that not all crime takes place in the public realm.**

All crime: Total for all categories.
Anti-social behaviour: Includes personal, environmental and nuisance anti-social behaviour.
Bicycle theft: Includes the taking without consent or theft of a pedal cycle.
Burglary: Includes offences where a person enters a house or other building with the intention of stealing.
Criminal damage and arson: Includes damage to buildings and vehicles and deliberate damage by fire.
Drugs: Includes offences related to possession, supply and production.
Other crime: Includes forgery, perjury and other miscellaneous crime.
Other theft: Includes theft by an employee, blackmail and making off without payment.
Possession of weapons: Includes possession of a weapon, such as a firearm or knife.
Public order: Includes offences which cause fear, alarm or distress.
Robbery: Includes offences where a person uses force or threat of force to steal.
Shoplifting: Includes theft from shops or stalls.
Theft from the person: Includes crimes that involve theft directly from the victim (including handbag, wallet, cash, mobile phones) but without the use or threat of physical force.
Vehicle crime: Includes theft from or of a vehicle or interference with a vehicle.
Violence and sexual offences: Includes offences against the person such as common assaults, Grievous Bodily Harm and sexual offences.

This report gives recommendations. Please note that Crime Prevention Advice and the information in this report does not constitute legal or other professional advice; it is given free and without the intention of creating a contract or without the intention of accepting any legal responsibility. It is based on the information supplied and current crime trends in the area. All other applicable health, safety and fire regulations should be adhered to.

We strongly advise that independent third party certification is obtained from a manufacturer to ensure the fire performance of any of their door sets in relation to your needs and to ensure compliance with both current Building Regulations and the advice issued by the Department for Communities and Local Government on 22nd June 2017 following the Grenfell Tower Fire

Environment Agency	creating a better place Environment Agency Valerie Okeiyi London Borough of Haringey Development Control 639 High Road London N17 8BD **Our ref:** NE/2024/137208/02 **Your ref:** HGY/2023/2584 **Date:** 1 August 2024 Dear Valerie **13 Bedford Road, Wood Green, London, N22 7AU** **Demolition of the existing building and the erection of a new mixed-use development up to five storeys high with commercial uses (Use Class E) at ground level, 12no. self-contained flats (Use Class C3) to upper levels and plant room at basement level. Provision of cycle parking, refuse, recycling and storage. Lift overrun, plant enclosure and pv panels at roof level** Thank you for consulting us on the above application, on 15 July 2024. As part of the consultation, we have reviewed the following documents: • 'Phase 1 Contaminated Land Assessment', dated February 2024, prepared by GeoSmart (ref: 79540.00.01R1). • 'Phase 1 Contaminated Land Assessment – Part 1', dated July 2023, prepared by GeoSmart (ref: 79540R1). • 'Sitecheck Assess' for 13 Bedford Road, London, N22 7AU, dated 12 March 2023, prepared by Landmark (ref: 308421318). **Environment Agency position** The proposed development will be acceptable if the following **conditions** are included on the planning permission's decision notice. Without these conditions we would object to the proposal in line with paragraph 180 of the National Planning Policy Framework (NPPF) because it cannot be guaranteed that the development will not be put at unacceptable risk from or be adversely affected by unacceptable levels of water pollution. **Condition 1- Remediation strategy and verification plan** No development approved by this planning permission shall commence until a remediation strategy to deal with the risks associated with contamination of the site in respect of the development hereby permitted, has been submitted to, and approved in writing, by the local planning authority. This strategy will include the following components: 1. A site investigation scheme, based on Preliminary Risk Assessment (PRA) contained in the document 'Phase 1 Contaminated Land Assessment', dated February 2024, prepared by GeoSmart (ref: 79540.00.01R1) to provide Cont/d..		Comments noted. Conditions included

information for a detailed assessment of the risk to all receptors that may be affected, including those off-site.

2. The results of the site investigation and the detailed risk assessment referred to in site investigation and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.
3. A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (site investigation) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action.

Any changes to these components require the written consent of the local planning authority. The scheme shall be implemented as approved.

Reason
To ensure that the development does not contribute to, and is not put at, unacceptable risk from adversely affected unacceptable levels of water pollution in line with paragraphs 180 and 189 of the NPPF.

Condition 2 - Unexpected contamination
If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the local planning authority) shall be carried out until a remediation strategy detailing how this contamination will be dealt with has been submitted to, and approved in writing by, the local planning authority. The remediation strategy shall be implemented as approved.

Reason
To ensure that the development does not contribute to and is not put at unacceptable risk from or adversely affected by unacceptable levels of water pollution from previously unidentified contamination sources at the development site. This is in line with paragraph 180 of the NPPF.

Condition 3 - Piling and deep foundations
Piling, deep foundations, or other intrusive groundworks (investigation boreholes, tunnel shafts, ground source heating and cooling systems) using penetrative methods shall not be carried out other than with the written consent of the local planning authority. The development shall be carried out in accordance with the approved details.

Reason
To ensure that the proposed development does not harm groundwater resources in line with the Environment Agency's approach to groundwater protection and in line with paragraph 180 of the NPPF because it cannot be guaranteed that the development will not present unacceptable risks to groundwater resources.

Groundwater is present in several different aquifer units beneath the site separated by low permeability deposits. The shallowest groundwater bearing horizon is also, relatively, the most contaminated and piling could create preferential pathways allowing for contaminants to migrate towards the deeper, more sensitive, aquifer units. A foundation works risk assessment will be required, prepared with reference to the guidance presented in Piling into Contaminated Sites (Environment Agency, 2002).

Condition 4 - Verification Report
Prior to any part of the permitted development being brought into use, a verification

Cont/d..

report demonstrating the completion of works set out in the approved remediation strategy and the effectiveness of the remediation shall be submitted to, and approved in writing, by the local planning authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met.

Reason
To ensure that the site does not pose any further risk to the water environment by demonstrating that the requirements of the approved verification plan have been met and that remediation of the site is complete. This is in line with paragraph 180 of the NPPF.

Advice to Local Planning Authority

Risk of contamination
The proposed development site is currently used as a garage and MOT centre, with associated car parking area. The site was previously used of as a petrol station c. 25 years ago.

The current and previous use of the site presents a possible risk of contamination that could be mobilised during construction to pollute controlled waters. Controlled waters are particularly sensitive in this location because the proposed development site is within source protection zone 1 for a public groundwater abstraction.

The information submitted to support this application demonstrates that it will be possible to manage the risks posed to controlled waters by this development. Further detailed information will however be required before built development is undertaken. We believe that it would place an unreasonable burden on the developer to ask for more detailed information prior to the granting of planning permission but respect that this is a decision for the local planning authority.

Competent persons
The proposed development will be acceptable if a planning condition is included requiring the submission of a remediation strategy, carried out by a competent person in line with paragraph 189 of the NPPF. The Planning Practice Guidance defines a "Competent Person (to prepare site investigation information): A person with a recognised relevant qualification, sufficient experience in dealing with the type(s) of pollution or land instability, and membership of a relevant professional organisation."(http://planningguidance.planningportal.gov.uk/blog/policy/achieving-sustainable-development/annex-2-glossary/)"

The control of emissions from Non-Road Going Mobile Machinery (NRMM) at major residential, commercial or industrial sites
Where development involves the use of any non-road going mobile machinery with a net rated power of 37kW and up to 560kW, that is used during site preparation, construction, demolition, and/ or operation, at that site, we strongly recommend that the machinery used shall meet or exceed the latest emissions standards set out in Regulation (EU) 2016/1628 (as amended). This shall apply to the point that the machinery arrives on site, regardless of it being hired or purchased, unless agreed in writing with the Local Planning Authority.

This is particularly important for major residential, commercial, or industrial development located in or within 2km of an Air Quality Management Area for oxides of Nitrogen (NOx), and or particulate matter that has an aerodynamic diameter of 10 or 2.5 microns (PM10 and PM2.5). Use of low emission technology will improve or maintain air quality

Cont/d..

and support LPAs and developers in improving and maintaining local air quality standards and support their net zero objectives.

We also advise, the item(s) of machinery must also be registered (where a register is available) for inspection by the appropriate Competent Authority (CA), which is usually the local authority.

The requirement to include this may already be required by a policy in the local plan or strategic spatial strategy document. The Environment Agency can also require this same standard to be applied to sites which it regulates. To avoid dual regulation this informative should only be applied to the site preparation, construction, and demolition phases at sites that may require an environmental permit.

Non-Road Mobile Machinery includes items of plant such as bucket loaders, forklift trucks, excavators, 360 grab, mobile cranes, machine lifts, generators, static pumps, piling rigs etc. The Applicant should be able to state or confirm the use of such machinery in their application to which this then can be applied.

Advice to applicant

Water Resources
Increased water efficiency in new developments potentially enables more growth to be realised without an increased availability of water resources. Developers can highlight responsible water use as a positive corporate social responsibility message that will boost the commercial appeal of the development. For the homeowner/tenant, lower water usage also reduces water and energy bills.

We endorse the use of water efficiency measures in all developments, particularly in those that are new. Use of technology that ensures efficient use of natural resources could support the environmental benefits of future proposals and could help attract investment to the area. Therefore, water efficient technology, fixtures and fittings should be all considered as an integral part of new developments and/or refurbishments. The technology used to achieve improved water efficiency (e.g. efficient fittings, greywater recycling, etc) is also an attractive feature for many prospective building owners and tenants.

Residential developments
The supply of water in the area is under serious water stress (as identified in our report: Water stressed areas – 2021 classification). All residential developments must therefore achieve the higher water consumption efficiency standard of 110 litres per person per day, as set out within the Building Regulations &c. (Amendment) Regulations 2015. This standard **or higher** may already be a requirement of the local planning authority.

Pre Application Advice
Regarding future applications, if you would like us to review a revised technical report prior to a formal submission, outside of a statutory consultation, and/or meet to discuss our position, this will be chargeable in line with our planning advice service. If you wish to request a document review or meeting, please contact our team email address at HNLsustainableplaces@environment-agency.gov.uk.

Further information on our charged planning advice service is available at: https://www.gov.uk/government/publications/planning-advice-environment-agency-standard-terms-and-conditions.

Cont/d..

	Final comments Thank you for contacting us regarding the above application. Our comments are based on our available records and the information submitted to us. Please quote our reference number in any future correspondence. Please provide us with a copy of the decision notice for our records. This would be greatly appreciated. Yours sincerely, **Harry Scott** **Sustainable Places Planning Advisor** On behalf of, **Demitry Lyons** **Sustainable Places Planning Advisor** Email: hnlsustainableplaces@environment-agency.gov.uk Telephone: 020 7714 0578	
NEIGHBOURING PROPERTIES		
	Land Use and housing - Concerns with the loss of the current use - Current local garage is well used	The redevelopment of the site will generate an uplift of jobs compared to the existing position. The proposed development would result in a reduction in noise levels and general disturbance in comparison to the existing use of the site The applicant has confirmed that the garage is let on a short time basis. This is in order to have some income to cover

		running costs and also avoid squatters. The current repair garage is only here on a temporary basis, they will be relocating.
	- Concerns with the employment floorspace proposed	The proposed Class E floorspace has been designed to be flexible and to appeal to a broad range of occupiers
	- Concerns the commercial units will have an impact on the vitality of Palace Gates Road/Crescent Road	It is acknowledged that the site's location away from the local town centre on Palace Gates Road has meant that most traditional town centre uses would not be attracted to the location of the site.
	- Concerns with the standard of residential accommodation - Concerns with the internal layout of the building -	It is considered that the quality of the residential homes including the internally layout is acceptable as set out in section 6.7 of the report

	- Concerns with the design of the M4(3) and M4(2) dwellings - Concerns with the outdoor private amenity space provision - Concerns with the housing mix - Inappropriate land use	All the M4(3) and M4(2) dwellings will have to meet Building regulations 2010 (as amended) It is considered that the private amenity space provision is acceptable as set out in paragraph 6.7.5 of the report. It is considered that the proposed development provides a good mix of homes, which would deliver a range of sizes and includes a substantial proportion of family sized 3 bed homes to meet local housing requirements. The proposed mixed-use development is considered acceptable as it would potentially provide flexible commercial space that in turn would increase the number of potential jobs on the site and

		also provide new homes which will contribute to the borough's housing stock
	Size, Scale and Design - Excessive height and scale in relation to the site - The development is not appropriate in relation to the surrounding buildings	It is considered that the proposed height, form, bulk, massing conforms well to the established character, and acts as a highly compatible neighbour to adjoining sites.
	- Design and scale out character - Poor design - Eyesore - Impact on the character and appearance of the area - The building extends over the building line - Choice in materials fails to address immediate area - Insufficient streetscape context has been provided	The overall design including choice of materials has evolved through multiple iterations, incorporating feedback from both the Quality Review Panel (QRP) and planning officers, resulting in improvements to massing, architectural expression, and detailing. Each planning application is judged on its own merits

	- The development will set a precedent - The developer may want to consider their choices of glazing and ventilation - Overdevelopment of the site - Conversion of the existing building should have been considered - Details of the balcony screening should be provided at this stage **Impact on neighbours** - Close proximity to the boundaries of adjoining residential properties - Overlooking/loss of privacy	Details of ventilation and glazing will be secured by the overheating condition It is considered that the proposed scheme represents sustainable development, optimising the potential of the site for a high-quality mixed use development which responds appropriately to the local context Details of the balcony screening will be secured by condition The proposal is not considered to result in an unacceptable impact on local amenity – covered in section 6.8 of the s report Loss of privacy and overlooking is covered

	- Loss of daylight and sunlight - Overshadowing - Poor outlook - Loss of outlook - Overbearing	in the main body of the report. Nearby residential properties would not be materially affected by the proposal in terms of loss of privacy/overlooking Loss of privacy and overlooking is covered in the main body of the report. Nearby residential properties would not be materially affected by the proposal in terms of loss of privacy/overlooking Impact on daylight and sunlight is covered in the body of the report. There is no significant detrimental impact on the amenity of nearby occupiers in regards to daylight/sunlight. The proposed development would see the principal use of the site changed to residential, with two

	- Commercial use detriment to residential amenity **Parking, Transport and Highways** - Traffic congestion - Inadequate parking provision - Parking pressure	commercial units proposed at ground floor level. The proposed development would result in a reduction in noise levels and general disturbance in comparison to the existing use of the site. A condition would be imposed limiting the hours of the commercial use to protect the amenity of neighbouring residents The Transportation Officer has assessed these points and which have been covered in section 6.9 of the report. it is considered that the application is acceptable in transport and parking terms, and in terms of its impact on the public highway and the uncertainty in terms of parking

	- There is no parking provision provided for the wheelchair accessible home	stresses has been sufficiently addressed and includes a S106 contribution towards parking management measures. The applicant would be required to enter into a s278 agreement, to provide a blue badge bay on-street outside of the development on Bedford Road This would be dedicated to the resident of the wheelchair home within the development, secured via a legal agreement The design and arrangement of all cycle parking will need to meet the requirements of TfL's London Cycle Design Standards. This is secured by a condition The transportation team has considered highway and pedestrian safety during

	- The cycle store does not provide space for all types of cycles - Road safety concerns - Construction vehicle concerns - It is recommended that the developer engage with the Alexandra Palace & Park Charitable Trust on their Construction Management Plan regarding events held throughout the year which sometimes require the closure of Alexandra Palace Way - Concerns with delivery and servicing vehicles	demolition, and construction phase A construction logistics plan will be secured by a legal agreement to manage construction vehicle activity into and out of a proposed development in combination with other sites in the area The Alexandra Palace and Park Charitable Trust raised the issue of construction traffic and the need to occasionally close one of the local roads for major events. This concern raised will be addressed by the Demolition and Construction Logistics Plan. A Delivery and Servicing Plan is required and must also include a waste management plan which includes details

		of how refuse is to be collected from the site will be secured by a condition
	Environment and Public Health - Noise and disturbance from on-going construction	Any dust and noise relating to demolition and construction works would be temporary nuisances that are typically controlled by non - planning legislation. Nevertheless, the demolition and construction methodology for the development would be controlled by the imposition of a condition
	- Noise pollution from plant enclosure	Noise pollution from the plant enclosure will be secured by a condition
	- Noise and disturbance from the employment floorspace	The increase in noise from occupants of the commercial floorspace would not be significant to neighbouring occupants given the current use of the site

		which currently operates as a MOT Service/car repair garage
	- Noise and odour from the proposal - No assessment of possible odours from the commercial use has been provided - No assessment of noise has been provided	Noise and odour concerns from the proposed development will be secured by condition
	- Noise and disturbance from refuse and recycling collection	The Council's Waste Management Officer is satisfied with the proposed arrangement for the refuse/recycling bin collection and provision
	- Hours of operation of commercial units	The hours of operation of the commercial units will be secured by condition
	- CIL money should be used towards the upgrades, maintaining and improving the local area's existing open space - Pressure on existing infrastructure - Impact on Alexandra Park	The scheme would provide CIL payment towards local infrastructure including the improvement of existing open space
	- Biodiversity loss	The biodiversity net gain (BNG) of the

		development is covered in paragraph 6.12.12 of the report
	- The developer should ensure that their promotional material includes information on the history of the Park and Palace	Officer comments noted and will raise this with the applicant
	- No maintenance access is shown to the green roofs and green walls	The maintenance access will be secured through the landscaping condition
	- Secure by design concerns	The Secure by Design Officer does not object to the proposed development subject to standard conditions requiring details of and compliance with the principles and practices of the Secured by Design Award Scheme

	Others - Poor engagement throughout the process - Failure to comply with policy or supply evidence of compliance	The planning application was submitted in September 2023. Following officer advice, the applicant agreed to follow the Council's engagement process which includes presenting the scheme to the Quality Review Panel, and to Members of the Planning Sub-Committee. This would usually have taken place before the formal submission The applicant also undertook their own public consultation exercise on the proposals The proposed development complies with policy as set out in the main body of the report The Council's Building Control Officer and planning officers are satisfied that the policy

	- Concerns with the fire statement submitted	requirements have been sufficiently addressed and the fire safety information is satisfactory under London Plan Policy D12(A). A formal detailed assessment will be undertaken for fire safety at the Building Control stage
	- No CGI views from different locations to assess visual impact	CGI views from different locations to assess the visual impact has been submitted and assessed
	- Inconsistent perspectives have been provided	The perspectives have been updated
	- Daylight/sunlight assessment provides discrepancies	Further information regarding the daylight/sunlight has been requested by officers.
	- Evidence should be provided to support high construction cost in the viability assessment	The applicant's Affordable Housing & Viability Statement (AHVS) was

		independently assessed by BNP Paribas on behalf of the Council. The results from the review are set out in section 6.3 of the report
	- Design and Access statement provides inconsistencies	The Design and Access Statement has been updated to address the inconsistencies
	- Planning statement provides inconsistencies	Regarding the planning statement Officers have requested further information from the applicant to carry out the assessment. This is covered in the main body of the report
	- Insufficient survey carried out	A survey will be carried out at the detailed design stage
	- No basement plan provided	A basement plan has been provided on drawing number 1544/05 Rev E

	- No indication of mechanical plant size to the basement or roof	Details of the mechanical plan will be secured by the energy strategy condition
	- Alexandra Palace and Park Charitable Trust will make representations as part of licence applications for any outdoor café areas or late-night takeaways in the commercial space	Alexandra Palace and Park Charitable Trust comment noted
	- The Quality Review Panel required further consultation prior to the application being submitted or prior to a decision	The panel had expressed that they would welcome an opportunity to comment on the scheme again, once the design had progressed in consultation with planning officers. However, Officers are confident that the scheme has progressed positively and QRP comments addressed to an appropriate extent without the need to return for another design review.
	- Haringey's Flood and Water Management Lead require further information	The Councils Flood and Water management Officer is satisfied that

		the details of surface water drainage and management/ maintenance of the drainage scheme can be secured by a condition
	- Transport for London require the applicant to demonstrate that parking onsite is not feasible to show why on street parking is necessary for a blue badge space	The car parping for the blue badge space is covered in paragraph 6.9.5 of the report
	- The applicant's presentation to committee on 4th March 2025 contained inaccuracies.	The scheme and submissions has evolved since it was presented to the planning sub committee on 4th March 2025 incorporating feedback from the Quality Review Panel and planning officers

	Support - Positive addition to the area - The site is currently unattractive - Noise pollution concerns from existing use - Much needed development in the area - Current eyesore - The scheme is well designed - The scheme blends well into the area - The development will create jobs - Car free - The scheme provides cycle parking	

APPENDIX 4 QRP REPORT

4. Quality Review Panel's views

Summary

The panel considers the scale, height and massing of the proposals to be appropriate for the surrounding context. However, further refinements are needed to provide an elegant building for this important corner location that is visible from three directions, including from the conservation area on the other side of the railway lines. The building would read as a more coherent whole if one type of brick was used on all elevations, accentuating its carved form and integrating the Bedford Road elevation with the stepped Alexandra Park Road elevation and the set-back top floor. A subtle contrast could be achieved through, for example, a change in the type of mortar used. This refinement should reduce both the complexity and cost of the scheme. The one area where a contrast in materiality would be beneficial is to improve the prominence of the residential entrance. Consideration should be given to how the generosity of the entrance lobby can be improved and made more welcoming.

The plinth of the building should reflect and distinguish the ground floor commercial units from the residential accommodation above. Thought should also be given to how the commercial space can be future-proofed, with flexibility built into the design, to ensure its immediate and long-term success. Tests for various uses should be undertaken.

The proposed green wall has the potential to provide a pleasant outlook for both residents and neighbours. However, it is crucial that a landscape architect is appointed as early as possible, to ensure that the green wall can be delivered and maintained, and that the landscape proposals are designed in tandem with the design of the building. A green roof should be provided at first floor level and consideration should be given to the provision of inbuilt balcony planters, as well as new street trees along Bedford Road, to improve the pedestrian experience enroute to/from Alexandra Park. Further information should be provided on environmental sustainability, including details on how BREEAM Excellent will be achieved for the commercial units, a ventilation strategy, and updated modelling that accurately reflects any changes to the building.

Architectural expression and materiality

- The panel feels that the materiality of the building should be simplified. It suggests that one type of brick should be used on all elevations of the building. This will help to accentuate its carved form, allow it to read as a coherent whole when viewed from all three directions, and provide a solid end to the block.

- The use of a single type of brick will help to integrate the horizontality, created through the stepped elevation on Alexandra Park Road, with the verticality of the Bedford Road elevation.

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1. Project name and site address

13 Bedford Road, London N22 7AU

2. Presenting team

Chris Georgiou	CG Architects
Anthony Christodoulou	Adelfia Property Ltd

3. Planning authority briefing

The site is located on the junction of Bedford Road and Alexandra Park Road, directly opposite the mainline from King's Cross train station. It is a brownfield windfall site, comprising a two-storey building with a glazed frontage at ground level on Bedford Road and an area of hardstanding for car parking. It is currently in use as a car repair business. The building reads as a single storey structure along Alexandra Park Road due to the sloping ground level. The existing building is of limited architectural merit and is surrounded by a wide range of building styles.

To the north is a four-storey mansion block. To the south, fronting Bedford Road, is a row of two-storey Edwardian houses. Immediately west of the site, fronting Alexandra Park Road, is a car park and a two-storey purpose-built block of flats. Further west there are predominantly two-storey semi-detached houses. The site lies to the east of the listed Alexandra Palace, which is within a conservation area and the Alexandra Palace Park, a registered park and garden. It is designated within a critical drainage area.

The proposal is for a mixed-use development, with flexible class E floorspace at ground level and residential units above. Officers would welcome the panel's comments on the quality of the residential accommodation and commercial units. Comments are also sought on the proposed greening for the site, particularly the inclusion of a green wall.

- While the setback of the top floor of the building is supported, the panel suggests that the building's elegance and cohesion could be improved by also using the same type of brick on setback.

- The panel supports the use of a red brick that fits into the surrounding context, but it encourages the design team to look at high-quality precedents where red brick has been used in way that will create the intended contrast.

- For example, a subtle contrast could be achieved through a change in the colour and/or type of mortar, as demonstrated by White Arkitekter in Gascoigne Estate, Barking.

- The ground floor of the building should reflect its commercial use, with the plinth of the building clearly distinguished from the residential accommodation above. This will help to draw people along Bedford Street from the Palace Gates Road shopping centre.

- Further thought should be given to minor changes that could be made to the commercial frontage to make it more permeable and inviting whilst also ensuring the internal usage is of a high quality, to ensure its long-term success and viability.

Commercial space

- Consideration should be given to how the units will complement the existing uses in the Palace Gates Road shopping centre.

- Replacing the full-length windows, with an area of solid wall beneath each window, could help to improve the robustness of the building at ground level and provide some screening of the interior.

- Further details should be provided to demonstrate how the commercial units will be future-proofed to ensure their long-term success. For example, drawings should be provided to officers, to show how the two proposed units could be successfully split into four smaller units.

- Tests should be undertaken and the evidence provided to officers, to give confidence that the units can accommodate a range of different uses and have the potential to be let from the outset.

- Thought should be given to which units would best suit, for example, retail or a café, where large areas of glazing would be beneficial, as opposed to an office, which is likely to prefer smaller windows. The wall-to-glazing ratio will affect the visual appearance of the building.

- Consideration should also be given to the effect that different uses will have on the appearance of the building and how they might best be accommodated and managed. For example, a nursery is likely to screen the windows for privacy which would then create a blank façade.

Quality of residential accommodation

- Consideration should be given to how the plan can be improved to provide a more generous and welcoming entrance for residents.
- The provision of a bench and soft lighting would help to imbue the entrance lobby with a sense of welcome.
- A change in the materiality and the use of high-quality materials, both externally and internally, would help to give the entrance greater prominence from the street. Textures should be considered, given that the material will be experienced from close proximity every day.
- The amount of amenity space available to each flat could be increased by allowing residents to use some of the deck access space outside the unit.

The green wall

- The proposed green wall has the potential to provide a pleasant outlook for both the residents and neighbouring homes. However, it is crucial that a landscape architect is appointed before the planning application is submitted, to provide input into the final design. The green wall and green roofs should be designed in tandem with the design of the building and submitted as part of the planning application.
- The panel suggests that the proposed geometry of the green wall should be simplified, to ensure that it can be delivered and will be easy to maintain. A maximum of three zones should be provided.
- Ideal growing conditions should be provided and plants should be selected to suit the microclimate, to ensure that the green wall will thrive.
- Careful consideration should be given to how the planting can look good from day one. It may be necessary to provide some interim deck planters, while the plants grow to their full height.
- Integrated irrigation should be provided and a maintenance strategy put in place. The cost of maintenance should also be considered, given the small number of homes in the development.
- Further thought should be given to how the plants will be supported and how the support mechanism will affect the building's appearance, particularly before the plants have reached their full height.
- Consideration should also be given to the relationship of the green wall to the balustrade and how the deck will be detailed.
- The panel supports officers' use of conditions, to ensure that all aspects of the detailed design are considered.

First floor green roof

- The panel suggests that a green roof should be provided, in addition to the green wall planters, at first floor level,. Consideration should also be given to a raised planter that could function as a balustrade.

- A green roof would enhance residents' everyday journey along the first-floor access deck. It would also have the potential to provide larger balconies and an improved outlook for the adjoining bedrooms of Flats 1 and 4.

- Details should be provided on how the scheme will contribute to biodiversity net gain.

- If the balconies are large enough, consideration should be given to incorporating inbuilt planters into the design, to encourage residents to provide additional greening. This would be particularly beneficial on the south and east facing balconies, which are visible from the route to Alexandra Park.

Public realm improvements to Bedford Road

- Further consideration should be given to the provision of new street trees along Bedford Road, to improve the pedestrian experience of the route to and from Alexandra Park. A survey should be undertaken to establish if there are any underground services.

- The panel commends the design team's engagement with the highways department, and it welcomes the proposed improvements to the footpath along Bedford Road.

Environmental sustainability

- The panel commends the aspiration to achieve BREEAM Excellent for the commercial units, but further details should be provided to demonstrate how this target will be achieved.

- A ventilation strategy should be provided, with priority given to passive ventilation. Modelling should include all elements that will affect the building's performance, including whether windows are openable or not, as this will affect both ventilation and noise, given the close proximity of the railway lines.

- The windows facing onto balconies could be more generous, to allow maximum daylight into homes.

- Daylight and sunlight analysis should take into account the effects of balconies, brise soleil, and green wall planting.

- The panel welcomes the proposed biosolar green roof. Further details should be provided to officers to ensure that it will be delivered.

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Next steps

- The Haringey Quality Review Panel would welcome an opportunity to comment on the scheme again, once the design has progressed in consultation with planning officers.

APPENDIX 5 PRE-APPLICATION COMMITTEE MINUTES

Minutes:

Valerie Okeiyi, Principal Planning Officer, introduced the report for demolition of the existing building and the erection of a new mixed use development up to five storeys high with commercial uses (Use Class E) at ground level, 12 no. self-contained flats (Use Class C3) to upper levels and plant room at basement level. Provision of cycle parking, refuse, recycling and storage. Lift overrun, plant enclosure and photovoltaic (PV) panels at roof level.

The following was noted in response to questions from the committee:

- Officers received this application a while ago and as they were discussing the scheme at pre application stage, they wanted to take this through the engagement process and part of that engagement process would be bringing it to pre application for members to look at.

- A viability assessment had been submitted which was going through consultation with external consultants. There was a sum of monies that was being discussed as a payment in lieu for one site affordable housing.

- The comments from the QRP came back and they suggested that the development should be a single brick colour and that it would be helpful to try to find other ways to delineate the building. The applicant had taken their comments on board, and they have made a very positive contribution to the design of the building.

- The applicant would provide further detailed drawings on the elevations.

- On the rear side of the building, there would be open air corridors. These would provide access to all of the flats. In order to provide privacy to the residential block on Alexandra Park Road, it was decided to provide screening in the form of a green wall. That would entail planters at each level which would then allow for plants to grow and to be suspended vertically across the balcony corridors.

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- The applicant was still in discussions with officers regarding the exact uses under the class E space, both were trying to narrow it down to an appropriate combination.

- QRP were supportive of the height of the development. The only thing officers did not take on board was replacing the zinc cladding of the top floor with a brick slip, officers thought that maintaining the zinc was better for the building but could revisit that suggestion.

- The building management company would be responsible for the upkeep of the green wall.

Appendix 6 Feedback from Applicants public consultation event

Seven completed forms were received, and the comments are as follows:

1. Overall what are your thoughts on the proposed development?

Category	No. of response
• Exciting	1
• Positive	4
• Neutral	1
• Concerned	1
• Opposed	

2. What aspect of the redevelopment do you find most appealing or beneficial to the community?

- Commercial units will it be useful to the community? Perhaps a nursery?
- New shops
- New neighbours.
- We will have a smart end to our road. Hopefully the two shop units will be useful.
- Increased amenities for the local population – opportunity to create a critical mass of units and have a destination retail/café hub.
- An extra venue for the migrant Ally Pally event goers to attend.
- Sympathetic/ good overall design with positive aspects of sustainability and like the fact its car free.
- Overall design is appealing and create a statement building in the area.

3. Are there specific concerns or considerations you would like the developers to address in their plans?

- Nursery, butchers, fishmongers, fruit and veg,, nice café, a late night wine bar.
- Restrictions on residents parking. How do you prevent visitors parking, and weekend parking put side Monday – Friday 12pm – 2pm.
- Restrictions on construction, roof plant – noise, height, access
- Restriction on overlooking to the west
- Right to light form flats behind.
- Not really other than planning office will oversee environmental etc issues.
- No detracting from existing retail units.
- The Impact of the building work on traffic over a period of years.

- Traffic movement during construction, parking.
-

4. Any suggestions for ensuring the shops contribute positively to the local community?

    - Bringing more life / movement to the community with a shop that is useful to the residents and not taking business away from current shops ideally.
    - Coffee shop/eatery.
    - I would like a chain professional supermarket. We have enough DIY food shops around the corner. We miss the tool/ ironmongery we used to have.
    - Ensuring a community feel – businesses which would attract footfall.
    - Support young families.
    - Something to be used by a wide range of people.
    - Would be nice to have a nice coffee shop and community room to hire.

5. How do you envisage the redevelopment impacting the neighbourhoods character or environment?

    - Too Tall.
    - Hopefully positively.
    - Its quite a mix architecturally so it wouldn't be an "eyesore".
    - Positively – especially if it draws the migrant Ally Pally crowds.
    - Hopefully positively.
    - Enhancing the overall area

6. Any other comments?

    - Forest Lodge to the west has habitable rooms facing the back of the building.
    - Balconies to Flats 1, 5 and 8 overlooking.
    - Good luck with it all.

Email responses received

We met briefly last week at your presentation on the Bedford Road Mixed use scheme. I am an owner of the building next to the proposed development: Forest Lodge 357 Alexandra Park Road. As discussed, our main concerns about the development are related to the loss of light and privacy issues from the habitable rooms in our building that will be facing your scheme. Rooms in question highlighted below: