

### Parkhurst Road - Response to Consultees

Consultee	Topic	Detailed Comment	Response
English Heritage	Height, Bulk, Scale	Whilst I do not wish to raise any objection in principle to the redevelopment of the site, I am concerned that the height, scale and bulk of the proposed scheme is significantly greater than the existing buildings on Parkhurst Road, both within and outside the conservation area. Whilst the architects have sought to modify the height and bulk by setting back the upper floors from the main elevation, the low scale of its neighbours and the long views naturally afforded by Parkhurst Road result in its form and bulk being clearly visible. The proposed building would dominate local views and harm those through the conservation area by looming above its nineteenth century neighbours in a mass and form which fail to relate it. In my view, the highly visible balconies on the front elevation compound this further, emphasising the uncharacteristic angular form of the building as well as potentially further harming views through the area further as the use and appearance of such private spaces are difficult to manage successfully.	This comment is aimed specifically at the block which faces Parkhurst Road – block F. The height scale and bulk of block F has been considerably reduced in the current scheme and is in keeping with the scale of the nineteenth century villas which it neighbours along Parkhurst Road. See section 5.2.1.1 of the Design and Access Statement for detailed response. The 10 updated views in the TVIA illustrate that the Proposed Development will appear entirely appropriate in all views and will not dominate local views. The massing of development across this large backland site responds positively to the scale and height of development that surrounds it, with the taller block sited to the north closest to the variety of existing residential apartment blocks on Tufnell Park Road. The use of varied brickwork (colour and bonding) and arrangement of fenestration will provide well articulated elevations of a residential grain and appearance that complement the surrounding development.
Natural England	Protected Species	Natural England has published Standing Advice on protected species. The Standing Advice includes a habitat decision tree which provides advice to planners on deciding if there is a 'reasonable likelihood' of protected species being present. It also provides detailed advice on the protected species most often affected by development, including flow charts for individual species to enable an assessment to be made of a protected species survey and mitigation strategy. You should apply our Standing Advice to this application as it is a material consideration in the determination of applications in the same way as any individual response received from Natural England following consultation.	Natural England standing advice has been applied, ecological surveys including a Phase 1 Habitat Survey and Bat surveys have been carried out.
	Local Sites	If the proposal site is on or adjacent to a local site, e.g. Local Wildlife Site, Regionally Important Geological/Geomorphological Site (RIGS) or Local Nature Reserve (LNR) the authority should ensure it has sufficient information to fully understand the impact of the proposal on the local site before it determines the application.	N/A
	Biodiversity Enhancements	This application may provide opportunities to incorporate features into the design which are beneficial to wildlife, such as the incorporation of roosting opportunities for bats or the installation of bird nest boxes. The authority should consider securing measures to enhance the biodiversity of the site from the applicant, if it is minded to grant permission for this application. This is in accordance with Paragraph 118 of the National Planning Policy Framework. Additionally, we would draw your attention to Section 40 of the Natural Environment and Rural Communities Act (2006) which states that 'Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity'. Section 40(3) of the same Act also states that 'conserving biodiversity includes, in relation to a living organism or type of habitat, restoring or enhancing a population or habitat'.	This has been taken into consideration. On site-measures include provision of artificial roosting habitat for bats and bird boxes.
	Landscape Enhancements	This application may provide opportunities to enhance the character and local distinctiveness of the surrounding natural and built environment; use natural resources more sustainably; and bring benefits for the local community, for example through green space provision and access to and contact with nature. Landscape characterisation and townscape assessments, and associated sensitivity and capacity assessments provide tools for planners and developers to consider new development and ensure that it makes a positive contribution in terms of design, form and location, to the character and functions of the landscape and avoids any unacceptable impacts	Green space is provided within the scheme, as detailed in the Design and Access Statement. Landscaping that is suitable for bats, birds, and insects has been recommended within the landscape section of the Design and Access Statement to increase the biodiversity value of the area.
Transport for London	Access	Access to the site is currently via vehicular route leading from Parkhurst Road, located to the south of a pedestrian crossing. This access will continue be the main vehicular, cyclist and pedestrian access point to the proposed development. The proposals ground floor plan indicates that a footway will be created on its north side to ensure pedestrian safety which is welcomed.	N/A
	Parking	A total of 16 accessible spaces are proposed for this development; this is supported by TfL. However TfL requests that a 'car-free' development in this location, in light of the site's high PTAL rating and minimise traffic congestion on the nearby section of the TLRN. To minimise any parking overspill onto the TLRN, TfL requests a 'permit free' agreement shall be secured via a section 106 'car free' agreement.	Following consultation with the local authority the basement car park has been removed. The scheme now provides only 2 accessible parking bays on site. The applicant is happy to agree to a 'car free' development through a s106 agreement, and will also make a contribution towards the provision of accessible parking off site.
		TfL welcomes that a draft parking management plan has been submitted and the finalised plan should be secured by planning condition.	The applicant is happy for this to be secured by condition.
	Public Transport	TfL considers that any additional public transport trips generated by the development would have limited impact on the surrounding public transport network, and therefore no contribution towards mitigation is considered necessary.	N/A
	Walking	TfL welcomes that PERS audit has been undertaken and submitted. The audit identified a range of improvement concerning legibility for visual impaired users and, footway quality in the vicinity. Similarly, this issue has also been highlighted in the Stage 1 Safety Audit submitted. It is welcomed that the developer is willing to contribute toward footway renewal, TfL therefore require the applicant to enter into a s278 Agreement under Highways Act 1980 with TfL toward access/ crossover and footway renewal along the sites frontage, TfL also seek a further £150K contribution toward proposed upgrade of the Nags Head junction to be delivered by TfL, which is currently estimated to cost £15 millions. The scheme will provide improved safer and better walking and cycling environment in the area and will be benefited by prospective residents of the proposed development.	The applicant will enter into the Section 278. A s106 will also be signed confirming the contribution to the Nags Head junction, subject to viability considerations.
	Cycling	A total of 276 cycle spaces are proposed, this complies with London Plan Policy 6.9 "Cycling" and is therefore welcomed. TfL requests that the cycle parking facilities be secured, covered and located where cyclists can access them conveniently and safely.	164 cycle spaces are provided in the revised scheme. The reduced cycle parking provision still meets the London Plan Policy 6.9 "Cycling". Cycle parking facilities will be secured, covered and located where cyclists can access them conveniently and safely
	Trip Generation	The trip generation and modal split assessment included in the transport assessment is considered reasonable and therefore in line with London Plan policy 6.3 'Assessing effects of development on transport capacity'. TfL does not consider the level of vehicular trips generated from the proposal would, in itself, result in significant impact to Parkhurst Road and A1 Holloway Road.	N/A

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	Construction, Servicing, deliveries and freight	A draft Construction Logistics Plan (CLP) was submitted with the application, which is welcomed by TfL. In line with London Plan policy 6.14 "Freight", TfL expects the finalised version of the CLP to be secured by condition and/or through the section 106 agreement as appropriate and should accord with TfL guidance. The CLP should identify efficient, safe and sustainable arrangements to be employed at each stage of implementation of the development to reduce and mitigate impacts of freight vehicle movements arising from the scheme, including impacts on the expeditious movement of traffic, amenity and highway safety. Details should, where relevant, include FORS or similar accreditation, site access, loading/unloading and parking arrangements, booking systems and timing of arrivals at and departures from the site, vehicular routes, scope for load consolidation and the use of alternative modes and measures to reduce risks and impact of collisions with vulnerable road users. The submission and the according implementation of these plans should be secured by conditions/ s106 obligations. A draft delivery servicing plan (DSP) should also be secured by a planning condition, to comply with London Plan policy 6.14 'Freight'.	The applicant is happy for these documents to be secured by condition.
	Travel Plan	TfL welcomes the submission of the draft Residential Travel plan, which pass the review in accordance with the ATTrBuTE assessment tool. A finalised travel plan, including the action plan should therefore be secured, monitored and funded through the section 106 agreement, in line with London Plan policy 6.3 'Assessing effects of development on transport capacity'. A copy of the ATTrBuTE assessment is attached for your reference.	The applicant is happy for the draft Travel Plan to be secured, monitored and funded through the s106 agreement.
	EVCPs	In line with London Plan policy 6.13 'Parking', a total of three Electric Vehicle Charging Points (EVCPs) should be provided; this equates to 20% of overall provision. Passive provision should also be made for a further 20% in line with London plan standards. It is also recommended that the monitoring of electric vehicle use should be included in the travel plan, with an agreed trigger for the activation of the additional charging points.	Given the reduction in parking to only two at grade accessible parking spaces no electric provision is proposed.
<b>Thames Water</b>	Waste	Thames Water requests that the Applicant should incorporate within their proposal, protection to the property by installing for example, a non-return valve or other suitable device to avoid the risk of backflow at a later date, on the assumption that the sewerage network may surcharge to ground level during storm conditions.	Non-return valves will be fitted to the foul and surface water networks as necessary.
	Surface Water Drainage	With regard to surface water drainage it is the responsibility of a developer to make proper provision for drainage to ground, water courses or a suitable sewer. In respect of surface water it is recommended that the applicant should ensure that storm flows are attenuated or regulated into the receiving public network through on or off site storage. When it is proposed to connect to a combined public sewer, the site drainage should be separate and combined at the final manhole nearest the boundary. Connections are not permitted for the removal of groundwater. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. They can be contacted on 0845 850 2777. Reason - to ensure that the surface water discharge from the site shall not be detrimental to the existing sewerage system.	Separate foul and surface water networks have been proposed throughout the site and also connect to the combined sewer separately to avoid potential cross-drainage issues - there is no combined drainage on the site at all. Refer to Drawing Nos. 3472-C-100, 101 and 700.
		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.	The design complies with Pollution Prevention Guideline 3 - there is no requirement for a petrol interceptor as there are only two car parking spaces and no service yards.
	Water	No impact 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 water infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement. Reason: The proposed works will be in close proximity to underground water utility infrastructure. Piling has the potential to impact on local underground water utility infrastructure. The applicant is advised to contact Thames Water Developer Services on 0845 850 2777 to discuss the details of the piling method statement.	It is agreed that an appropriately worded condition can be attached to the planning permission to require this statement to be submitted should impact piling take place.
	Supplementary	Please could documents be made available indicating points of discharge to public sewers for foul and surface water flows. In addition please confirm what is the overall reduction in surface water flows. i.e. existing surface water discharges (pre-development) in to the public sewers for storm periods 1 in 10, 30, 100 etc... versus the new proposed volumes to be discharge for the whole development.	Connection points are indicated on Drawing No. 3472-C-100. Calculations for the surface water network are contained in Appendix D of the Drainage Assessment Report - these confirm the proposed discharge rates for the 1 in 1, 1 in 30 and 1 in 100 year events. Section 2.1 of the report confirms the existing discharge rates.
<b>Camden Council</b>	General	No comments.	N/A
<b>Environment Agency</b>	N/A	No comments.	N/A
<b>London Fire and Emergency Planning Authority</b>	N/A	No comments.	N/A
<b>LBI Responses</b>			
<b>LBI Energy Officer</b>	CO2 emissions	We request the applicant to provide us with the baseline regulated CO2 emissions, the baseline unregulated CO2 emissions, the final regulated CO2 emissions and final unregulated CO2 emissions.	This is provided in the Energy Strategy & Appendices
	Heating	In regards to the CLEAN (low carbon energy) aspect of the CO2 reduction hierarchy, our local policy requires major applications to follow a heating hierarchy when evaluating options:  1. Connection to existing heating or cooling district networks; 2. Developing a local Shared Heat Network for the supply/demand of heat/coolth between local area buildings via a CHP energy centre; 3. Site wide CHP network; 3. Communal heating and cooling;  Unfortunately there are currently no existing or planned District Heating Networks within a reasonable distance of the proposed 65-69 Parkhurst Road development. Therefore we encourage the applicant to consider the second option, for a Shared Heat Network. If this is found to be unfeasible, then a site wide communal heating system with a CHP energy centre should be considered.	Shared networks have been explored in the Energy Strategy and are currently deemed unfeasible. However this will be explored in detailed design. The plant room will be future proofed for a district heating network, hence the scheme could export or import energy as necessary. A site wide communal heating system with a CHP energy centre is the preferred solution.

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		<p>There are a number of existing buildings and proposed future developments within the vicinity of the proposed 65-69 Parkhurst Road development. To highlight this I have attached a word document with a rough outline of the details. We would encourage the application to investigate these opportunities with the relevant organisations. There may be an opportunity for 65-69 Parkhurst Road to be a heat customer of another development, and thereby not require onsite investment in onsite heat generation plant. There may be an opportunity for 65-69 Parkhurst Road to be a heat supplier to another development, and thereby further reduce the CO2 emissions of the development through increased CHP generation and lowering the residual CO2 emissions and CO2 levy.</p> <p>In all cases it should be noted that any major development will be expected to have a single communal heating system serving all heat demands for the site, and for this system to be optimised for future district heating connection as per our SPD guidance Appendix 1.</p>	<p>A single communal heating system is the preferred solution. Investigation into becoming a heat importer and or exporter shall be explored in detailed design. It is thought unlikely due to the scale of the other proposed surrounding developments and that plant spaces will be large enough to house a centralised network. A heat network would have to travel across various roads and privately owner land.</p>
	CHP Plant	<p>Building Regulations 2010 (non-domestic compliance guide, section 6.4) states: "CHP plant should be sized to supply not less than 45% of the annual total heating demand". We would however expect the applicant to seek an improvement on this minimum requirement, and typically for this size of development we would expect at least 60% of the total heating demand to be met by the CHP. The Energy Statement appear to state that the CHP will only provide 20% of the total heat demand.</p>	<p>A misunderstanding from the reader. This has now been made clearer within the Energy Strategy. The CHP is expected to deliver 70 % of the expected 'heat' demand.</p>
	Heat to Power	<p>In addition, the Energy Statement states a heat-to-power ratio of 0.5. This appears to be simply incorrect, as the heat-to-power ratio should be 1 at a minimum.</p> <p>We request the applicant addresses the above, and provides a more comprehensive assessment of the proposed CHP solution, including initial peak load analysis to demonstrate the anticipated heat demands, CHP operation, thermal storage charge, and gas boiler operation.</p>	<p>The ratio has now been corrected and set at 2.5.</p>
	Hot Water	<p>We advise the applicant to consider the following guidance from the council's Environmental Design SPD, Appendix 1: The use of direct instantaneous hot water generation should be considered. This removes the need for hot water storage, reducing energy consumption and heat losses, reduces pipe work, space and pumping costs and more importantly secures low return temperatures by adopting a heat exchanger arrangement that uses the DH return water to pre-heat the cold water makeup.</p>	<p>As previous submission. The dwellings will be serviced via utility pods with Heat Exchanger (HE) within them. No hot water storage will be provided within dwellings. This has been made clearer within the Energy Strategy.</p>
LBI Design Officer	General	<p>We request the applicant verify they have followed the council's Environmental SPD guidance on modelling of the building under future temperature scenarios, specifically sections 6.0.24-6.0.31.</p>	<p>An overheating analysis has been conducted within the Energy Strategy &amp; Appendices.</p>
		<p>We ask the applicant to consider insulating all internal heating pipe work well beyond current British Standards. Recent experience has shown evidence of overheating in communally heated new builds due to high internal gains from such pipe work.</p>	<p>All pipe work will be insulated beyond best practice.</p>
		<p>To confirm, we will require a 27% improvement (regulated + unregulated) on a Part L 2013 compliant building. Alternatively, you can elect to model against previous BRs (30% against 2010, or 40% against 2006) to demonstrate policy compliance.</p>	<p>Calculations have been undertaken in Part L 2010 and the scheme demonstrates beyond compliance requirements.</p>
LBI Design Officer	Height	<p>The proposed development, as illustrated in the submitted drawings and the verified views included in your Townscape, Visual Impact and Heritage Assessment and at Appendix A of your Design and Access Statement, is of a scale entirely inappropriate to its context. The proposed front block, with its 5-storey front elevation and 6-storey massing behind (which would be clearly visible in views from Parkhurst Road) would be significantly taller than the buildings and locally-listed buildings within the adjacent conservation area, and also the adjacent building at 41-80 Holbrooke Court, which comprises 3 storeys (plus lower ground floor) and which is located directly to the east of the application site. The significant contrast in heights between the proposed and existing buildings would result in the former relating poorly with and visually overwhelming the latter to an unacceptable degree, and to the detriment of the streetscape. English Heritage, in their letter of 20/01/2014, correctly assess the proposed development as "looming above" the nineteenth century buildings that stand in close proximity. This impact is illustrated – rather alarmingly – in drawing 201 (notwithstanding the fact that the fifth floor is not shown) and in views 1, 2, 3, 4, 7 and 8 in your Townscape, Visual Impact and Heritage Assessment.</p>	<p>The current proposal is determined by scale relationships between the individual blocks and their neighbours. See section 5.2.1.2 of the Design and Access Statement for detailed response. The revised scheme proposes a reduction in scale and mass on all blocks. The tallest building on the site is now six, rather than seven storeys, and the extent of the upper storeys has been reduced on all the blocks. The set-backs are now more pronounced and the scale and massing of the development has thus been considerably reduced. The number of dwellings has been reduced from 150 to 112.</p>
		<p>The harm that would be caused by the proposed development in relation to the Hillmarton Conservation Area is a significant concern. With the proposed front block rising behind and beside (and above the rooflines of) 47 to 63 Parkhurst Road, the setting, silhouette (against the sky) and appreciation of these heritage assets would be diminished, such that the significance of the conservation area would not be conserved or enhanced but would instead be materially harmed.</p>	<p>The massing of blocks F and E have been developed in response to this commentary – the current proposal locates the lower (three storey) frontage of block F on Parkhurst Road which significantly reduces the scheme's impact on the Hillmarton conservation area. See section 5.2.1.3 of the Design and Access Statement for detailed response. Section 4.1.3 of the Historic Environment report describes how the proposed design for Block F (and to a lesser extent Block E), which are the two aspects of the scheme which form part of the setting of a conservation area, are high quality and contextual and preserve the significance of the conservation area. Throughout the proposed scheme, the architectural style is contemporary, but the broad principles of development have been based on an understanding of the local character of the area (this is discussed in more detail in the Peter Stewart Consultancy report on townscape) and the architecture is of high calibre.</p>
		<p>The proposed rear block, which would be 4 and 7 storeys in height, would be similarly inappropriate in terms of height. It would stand significantly taller than any buildings to the west in Moriarty Close (as illustrated in drawings 203 and 206), and taller even than McCall House to the north, which is one of the tallest existing buildings in the area surrounding the application site. Again, the proposed building would poorly relate to its existing neighbours, would appear over dominant and obtrusive, and fails to respect and acknowledge the surrounding scale.</p>	<p>As described above, each block responds in scale to its neighbours- block A which is located to the west of the site, adjacent to Moriarty Close is three storeys with an attic storey set back 2.8 metres. See section 5.2.1.3 of the Design and Access Statement for detailed response. The development of the vast majority of the site does not have an impact on the historic environment. Blocks A-D and most of Block E are not visible from the public realm in any part of the adjacent conservation areas, nor do they impact on the setting of the listed houses on Tufnell Park Road. The townscape assessment by the Peter Stewart Consultancy shows that neither this scheme, nor the previous proposal, is visible in views of the listed buildings from Tufnell Park Road, given the distance from the site to the listed houses.</p>
		<p>Our pre-application discussions, and your application-stage Design and Access Statement and related documents, provided your team with opportunities to demonstrate that the proposed heights were appropriate to the site and its context. The planning application submission does not achieve this, and instead (through the abovementioned drawings and documents) illustrates a proposed development that would relate poorly with its context. Information included in your submission regarding existing heights that surround the site fails to provide a convincing context based justification for the proposed heights, and – in the case of the heights plan provided at page 12 of the Design and Access Statement – sets out questionable analysis where 4-, 5-, 6- and 7- storey buildings are grouped together, thus omitting significant detail of and differences between building heights in the surrounding area, and giving the misleading impression that your proposals for buildings of 4, 5, 6 and 7 storeys would sit within a context of similar heights. I would add that – as previously noted by officers – this plan has not been centred on the application site, and it does not provide height information for properties at the corner of Parkhurst Road and Chambers Road, yet areas some distance away (to the north and east) have been surveyed</p>	<p>The current proposal is for six blocks of varying heights – all have a set back top floor (attic storey) – block A is three storeys plus an attic storey, blocks B, C, and D are five storeys plus an attic storey, block E is five storeys plus an attic storey stepping down to four storeys at its southern end and block F is three storeys plus an attic storey. These heights are characteristic of the area and as described in all the points above - respond to the scale of surrounding buildings. See section 5.2.1.5 of the Design and Access Statement for further detail.</p>

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	Layout	<p>The reportedly "future-proofed" pedestrian route to the rear of the site has been given inadequate legibility, is narrowed and obstructed by the rear block and areas of landscaping, and – in its most northerly stretch – tapers, lacks private front doors opening onto it, has no natural surveillance at ground floor level, and offers no clues to the user as to whether the route connects to another street or public place. Rather than providing a route that would enable and encourage north-south movement (should agreement to provide a public through-route eventually be reached), the layout currently proposed would do little, if anything, to improve neighbourhood permeability and connectivity, nor would it adequately future-proof an opportunity to make such improvements.</p> <p>The Designing out Crime Officer, in his comments of 06/02/2014, asked for the path to the rear of block B to be gated, and I am concerned that there may be future pressure for similar gating of the northern stretch of the pedestrian route, due to the way in which it has been designed (with a lack of natural surveillance over entrances to block B's cycle store) and its apparent vulnerability to anti-social behaviour.</p> <p>The proposed "node" at the centre of the development would offer little amenity to either the public or residents of the development, due to its limited size and its setting. I would also note that, although vehicular traffic passing across the node may be low, these 2-way movements and those of cyclists would further limit the use and attraction of the node as an amenity space.</p> <p>Impressions of the development and the quality of this central outdoor space would be adversely affected by it being adjacent to a blank ground floor bin store elevation at the foot of a 7- storey elevation, and the vehicular entrance to the proposed basement car park.</p> <p>I note your team's suggestion that residents of the proposed development would rely at least partly upon existing play spaces outside the site – this should be reciprocated, and full public access to the play space proposed within the site should be provided. This requirement further highlights the need to ensure the proposed development is inviting, welcoming and legible to members of the public.</p> <p>The location of the proposed bin store of block C and the vehicular entrance – which, on the basis of what is set out in the submitted Design and Access Statement, does not appear to have been thoroughly tested as part of an iterative design process – prevents residents from accessing their homes from the node, and a single entrance (to be used by residents of all but 2 flats within blocks A, B and C) would instead be provided further to the north. Whilst this would draw residents further into the site on a regular basis, it hardly provides convenient access to block A, and would result in high numbers of residents passing the front doors and ground floor bedroom windows of block C, increasing the likelihood of disturbance and impaired amenity.</p>	<p>The future proofed pedestrian route which runs north to south through the site is a clearly defined axial path – the buildings frame the route, there is good natural surveillance from windows and balconies (blocks D and E have been re oriented – so that balconies overlook the pedestrian route) all along the route. See section 5.2.2.1 of the Design and Access Statement for further detail.</p> <p>The northern section of the path is gated – at the request of the designing out crime office but there is good natural surveillance – the entrances to the ground floor units of block B are positioned at ground floor facing north and the living rooms and balconies of the five floors of flats above directly overlook this area. The plant room has been relocated to the west of block b and the corner of the block is occupied by the living room of a 2 bed 4 person flat.</p> <p>The public amenity space which is located between blocks C,D and E is a combination of entrance square and play space. There is no vehicular traffic across the space – the ramp and underground car parking have been omitted in the current proposal. See section 5.2.2.3 of the Design and Access Statement for further detail.</p> <p>As outlined above, the vehicular ramp and access to car parking which were parts of the December 2013 scheme have been omitted in the current proposal. In the current proposals block C and D are 5 storeys plus an attic set back – significantly reduced in height and scale from the December 2013 scheme. The ground floor elevation of block C is punctuated by doors and windows to the building managers office and the bin stores are accessed from the east and west facades (which do not overlook the amenity space). See section 5.2.2.4 of the Design and Access Statement for further detail</p> <p>Part of the playspace requirement is provided by areas outside the site – see sections 6.2 and 6.3 – and part by the on site amenity space. This area is accessible to the public via the entrance off Parkhurst Road – the opening is generous and the pedestrian route is clearly separated and demarcated by the landscape treatment – there is good natural surveillance from balconies and windows along the route to ensure that the access is secure and welcoming. See section 5.2.2.5 of the Design and Access Statement for further detail</p> <p>The bin store has been replanned - it is located at the south of block C and is accessed from the east for collection - this means that the access to the bin store doesn't cross the public amenity space (to the south of block C). Access to the flats in blocks A ,B and C is across the courtyard where the planning of the landscape minimises intrusion on the ground floor flats - the diagonal path across the courtyard and buffer zones outside the ground floor flats.</p>
	Architecture and Elevations	<p>Officers consider that the design of the front building (block F) lacks innovation. Other than the balconies, which are at odds with the surrounding context and are possibly ill-conceived given that Parkhurst Road is heavily trafficked, there would be little to suggest that the building, when viewed from Parkhurst Road, formed part of a residential development. Its monolithic appearance and form would jar with the buildings in the wider streetscape, and would suggest the building may be in non-residential use.</p> <p>It appears that little or no consideration has been given to providing relief to the Parkhurst Road elevation (other than through the provision of balconies), even at parapet level where some architectural interest or definition could have been provided. The pitched roofs of the existing buildings along Parkhurst Road make a significant contribution to the streetscape of Parkhurst Road, however this is disregarded by the form – exacerbated by the bulk and mass – of the proposed development.</p> <p>The unfortunate siting of the plant room/substation door on the principal Parkhurst Road elevation would result in an unsightly, compromised frontage to the public realm, would unbalance the otherwise symmetrical elevation, and is unlikely to be necessary given the size of the site.</p> <p>Officers also have concerns regarding the treatment of ground floor elevations throughout the proposed development which lack robustness and grounding for the floors above. As a result of the depth provided by the balconies on the upper floors (which is welcomed in terms of architectural design), a greater degree of emphasis is required at ground floor level to provide a plinth for the floors above.</p>	<p>The Parkhurst Road elevation of block F has been developed to respond to the character of the nineteenth century housing which is characteristic of the area with a clear expression of base middle and top as well as the introduction of front doors at ground level, vertically proportioned windows and a set back attic storey. See section 5.2.3.2 of the Design and Access Statement for further detail. The use of varied brickwork (colour and bonding) and arrangement of fenestration will provide well articulated elevations of a residential grain and appearance that complement the surrounding development. The inset top floor clad in metal has a distinct 'roof-like' appearance.</p> <p>Please see response above</p> <p>The plant room/substation which was located in block F facing Parkhurst Road in the December 2013 scheme has been relocated in the current scheme to the south of block E and is not visible from Parkhurst Road. See section 5.2.3.3 of the Design and Access Statement for further detail</p> <p>The use of a clearly differentiated base is part of the detailing which has been adopted for each of the blocks in the current proposal . The ground floor is generally taller than the upper floors (3.525 metres for ground floor, 3.150 metres for upper floors) and the brick work is expressed in Flemish bond (alternating headers and stretchers). On the public facades the headers are recessed to give a distinct texture to the base whilst in less prominent locations the base is articulated by the use of different coloured headers. See section 5.2.3.4 of the Design and Access Statement for further detail</p>
	Density	<p>With a Public Transport Accessibility Level (PTAL) falling within the 4 to 6 range, the site has an "urban" setting category (as set out in London Plan policy 3.4 and the accompanying Table 3.2), where a residential density of 200 to 700 habitable rooms per hectare is appropriate. The current proposal's residential density sits well above the range suggested in the London Plan, and given the concerns set out elsewhere in this letter regarding heights and massing, this is considered to be problematic.</p>	<p>The PTAL rating for the site is 6 (which is the highest level of amenity). For an urban location a density of 200-700 habitable rooms per hectare is recommended in table 3.2 of the London plan 2011 for PTAL ratings of 4-6. The current scheme achieves a density of 610 habitable rooms per hectare – well below the recommended maximum of 700.</p>

Consultee	Topic	Detailed Comment	Response
		<p>Officers have previously raised concerns regarding the information included in your application submission relating to the residential densities surrounding the application site. At our meeting of 12/11/2013 and in my email of 12/12/2013 I asked for parcels of land (for which density data was to be provided) to be consolidated and to include land within the curtilages of buildings, and roads between buildings where appropriate. For example, the 3 buildings to the northwest of the application site (McCall, Hollins and Asker House), together with land within their curtilage, should be consolidated into 1 parcel. The various buildings of Holbrooke Court (including the building fronting Parkhurst Road, and the intervening road/path) should also form one parcel. Terraces to the west of the application site should be consolidated into a parcel or parcels of similar densities. In your team's response of 18/12/2013 you refused to provide this information, and page 10 of the submitted Design and Access Statement provides no contextual density information whatsoever.</p>	<p>The density diagram presented in section 3.3 of the Design and Access Statement measures density in accordance with the stipulations requested. Land incorporated in the curtilage of the buildings has been included in the assessment of density as have the roads between buildings where appropriate. McCall, Hollis and Asker Houses have been aggregated into a single plot. See section 5.2.4.2 of the Design and Access Statement for further detail</p>
		<p>Figure ground diagrams illustrate site coverage and can therefore inform assessments of density. In response to my requests of 22/10/2013 and 12/12/2013 you have provided a diagram at page 9 of the Design and Access Statement, however this does not provide useable figure ground analysis, as it does not show the footprints of the proposed buildings, it includes unnecessary details of streets, trees and annotations, and it is not centred on the application site.</p>	<p>The figure ground plan shown in section 5.2.4.3 of the Design and Access Statement shows the footprint of the proposed buildings, details of street trees and annotation have been omitted and it is centred on the site</p>
	Way Forward	<p>I would suggest your team begin the design process again. Following proper analysis of the site's context, and consideration of relevant planning policy requirements, aspirations and opportunities, I would suggest that a new testing of layouts and massing will need to be done, resulting in a new proposal more appropriate to the site's context.</p>	<p>Since the submission of the December 2013 a comprehensive redesign has taken place – the current proposal includes substantially reduced heights, substantially reduced density and the omission of basement car parking and the introduction of new architectural detailing to the elevations. See section 5.2.5.1 of the Design and Access Statement for further detail</p>
		<p>As advised at pre-application stage, any building fronting Parkhurst Road should not stand taller than the existing Territorial Army building, and new buildings behind it should be similarly respectful of adjacent heights and appropriate to their backland location. Using an iterative design process, you should take into account comments made by neighbouring residents at application stage (noting that a sufficient reduction in building heights on aesthetic grounds would also reduce natural light impacts), and should address crime, the fear of crime and anti-social behaviour concerns.</p>	<p>The massing has been adjusted in the current scheme to respond to this commentary. The new block F façade parapet height is at the same level as the existing territorial Army building facing Parkhurst Road. See section 5.2.5.2 of the Design and Access Statement for further detail.</p>
		<p>I would add that members of the Design Review Panel – in their discussion on 12/11/2013 – considered whether the proposed front building could include a small non-residential use, such as an office or retail unit at ground floor level, to add interest to the site's entrance and to avoid the location of residential accommodation immediately adjacent to the point where residents, Cadet Centre visitors, and associated vehicular and servicing traffic would enter the site. I would suggest you consider this idea in your redesign of the proposal – the introduction of such a use would raise no significant concerns in principle, if of limited floorspace, and if it can be demonstrated that there would be no resultant harm to amenity or to the viability and vitality of the Nag's Head Town Centre. Please refer to Development Management Policy DM4.4, which sets out criteria which proposals for town centre uses must meet, when proposed at out-of-centre sites.</p>	<p>It was confirmed by Officers during discussions regarding the revisions to the application that a non-residential use would not be acceptable given the revisions proposed. Other measures have been deployed to improve the site entrance, including widening the access road, adding interest to the elevations, separating pedestrian and vehicles, providing improved visual connection to the new entrance plaza and play space.</p>
<b>LBI Park Manager</b>	Nature Conservation	<p>In terms of existing wildlife value the site is very low. Whilst I would want to see an ecological assessment (phase 1 habitat survey) carried out, I suspect the only provision in the site would be for artificial nesting sites for birds and bats. I would wish to see any bat surveys on existing buildings and trees within the site, including any boundary trees that may be affected, include mitigation and enhancement recommendations for my review. If these are acceptable, conditioning of these findings would be requested.</p>	<p>Relevant mitigation has been included, including provision of artificial roosting habitat and recommendations for landscaping.</p>
		<p>With regard to the phase 1 habitat survey, it is as expected - there is very low existing wildlife value on the proposed site. In terms of the recommendations of the report, I am in broad agreement with these, in as much as to say that the main benefit of the development in terms of wildlife enhancement would be the creation of artificial nesting boxes for birds and bats and the creation of habitats that will be of enhanced value to wildlife (6.2 Phase 1 habitat survey).</p>	<p>Relevant mitigation has been included, including provision of artificial roosting habitat and recommendations for landscaping.</p>
	Bats	<p>With regard to the bat survey as submitted, the report is supported.</p> <p>a. From the surveys, it is clear that the site and adjacent gardens provide suitable and accessible foraging sites for bats. Given this, and the results of the phase 1 habitat survey, artificial habitat creation in any proposed development would be required, preferably integrated roosting provision, with detailed maps indicating their location provided. The locations of the roosting boxes should be in line with best practice and a result of advice from a suitably trained ecologist.</p> <p>b. The report highlights that the surveys fall short of the recommended levels for the main building (4.1 bat survey). Given the potential for the building to accommodate roosting bats, further surveys are requested, to ensure any demolition work does not contravene the relevant legislation protecting bats under the Habitats Regulations and Wildlife and Countryside Act. Option 1 and 2 of Section 5 of the Bat survey should be carried out to ensure this legislation is adhered to.</p>	<p>Options 1 and 2 have been carried out.</p>
	Landscaping	<p>In terms of the general landscaping plans, there are areas of biodiverse planting in areas of the site. However, I share my colleagues views expressed at the recent Streetbook Surgery that these sites could potentially become neglected and of low wildlife value, given the size of the areas and lack of connections between them. The site to the north east especially is heavily shaded by trees and proposed buildings, and any planting will have to be very specific to these conditions in order to establish.</p>	<p>Planting in this area will be designed to be shade tolerant, robust, tactile and non toxic. A site wide landscape management plan will be implemented that will include the measures required to build biodiversity in the long term. This will also outline clear responsibilities in relation to providing an efficient, safe and tidy site.</p>
<b>LBI Senior Street Management Officer</b>	Bin stores	<p>I do have concerns over communal bin stores, as they tend to suffer from poor practice in separation of recycling and refuse, in which the recycling gets contaminated by general waste. I hope that the bin stores will be segregated to allow for differentiation of waste types. Also, I see no provision for food waste, which should be considered.</p>	<p>Provision for food waste is being made at the ratio of one 240 litre bin per 30 units, equating to four bins. Provision for recycling will also be made within the communal bin stores and be clearly identifiable.</p>
<b>LBI Recycling and Waste Minimisation Officer</b>	Food waste	<p>Food waste should be considered. For communal properties, we work on the ratio of 1x 240 litre kitchen waste bin for every 30 properties.</p>	<p>Please see response above</p>

Consultee	Topic	Detailed Comment	Response
LBI Sustainability Officer	Drainage	I have read the Drainage Assessment Report, which does provide some of the information required, but does not extend to the level of detail/design development required at planning stage. Section 9 of the Drainage Assessment Report outlines the further work that needs to be undertaken in the development of the SuDS system for the site - this level of detail needs to be taken into account at planning stage, not left to retrofit into the scheme once landscaping details (etc) are finalised. The applicant needs to make firm commitments regarding SuDS, and provide an outline drainage proposal (SuDS management train) demonstrating how the design criteria (DM 6.6) has been satisfied in terms of: -Quantity -Water quality (no. of source controls according to surface type/contaminant levels - Amenity -Biodiversity	The Drainage Assessment Report has been updated to include / address these comments.
		The drainage proposal shall describe how the different elements will be integrated into the landscape design, and how they will link together to manage water quality and manage flows in excess of the design event (1 in 100yr plus 30% allowance for climate change).	Refer to Drawing Nos. 3472-C-100, 101 and 700 and the updated Drainage Assessment Report.
		I strongly suggest the applicant look at our information requirements in the Environmental Design SPD <a href="http://www.islington.gov.uk/publicrecords/library/Planning-and-building-control/Publicity/Public-consultation/2012-2013/(2012-10-22)-Environmental-Design-SPD-FINAL.pdf">http://www.islington.gov.uk/publicrecords/library/Planning-and-building-control/Publicity/Public-consultation/2012-2013/(2012-10-22)-Environmental-Design-SPD-FINAL.pdf</a> ) and Islington's SuDS guidance ( <a href="http://www.islington.gov.uk/services/parks-environment/sustainability/sus_water/Pages/SUDS.aspx">http://www.islington.gov.uk/services/parks-environment/sustainability/sus_water/Pages/SUDS.aspx</a> ) which provides a large amount of detail and examples of what we expect to see on a site such as this.	Refer to Drawing Nos. 3472-C-100, 101 and 700 and the updated Drainage Assessment Report.
	Water	The feasibility of providing rainwater harvesting or greywater recycling needs to be undertaken and outputs provided to Council for assessment. We would expect to see water recycling for a scheme of this nature. Are water butts proposed (as appears to be indicated in Code assessment)? If so, these need to be shown on the plans.	Water butts would not be connected directly to the below ground drainage system and so will not appear on AKT II's drawings.
	Materials and Construction	Information on how materials have/will be selected to minimise environmental impact should be provided. This should include the Green Guide Specification ratings of all the major building elements and procurement targets such as % of timber that is FSC-certified and total % recycled material content. A brief assessment of the feasibility of using low impact concrete (for example incorporating slag cement) should also be included.	The Sustainability Statement includes details of the measures that have been identified to maximise the use of materials from sustainable sources which have a low impact on the environment. Furthermore, it contains details of the target CfSH points in relation to environmental impact of materials. This may increase when materials are finalised.
	Waste	A target level of non-hazardous waste to be diverted from landfill should be provided; and a target level of materials to be derived from recycled and reused content. This should be supported by an outline Site Waste Management Plan setting out how this target will be achieved. A brief assessment of the feasibility of reusing or recycling demolition waste on and/or off site should also be provided.	The target for non hazardous waste is contained within the Sustainability Statement and will be at least 85% by weight or volume, or less than 3.4sqm per 100sqm of non hazardous waste. The Sustainability Statement also contains an outline of the Site Waste Management Plan and consideration of the feasibility of reusing/recycling demolition waste.
		Schemes should comply with Islington's Refuse and Recycling Storage Guide. Can communal composting facilities be provided on site? There is room to provide these facilities so we would expect to see them for this type of scheme.	Updated within Sustainability Statement.
	Ecology	The applicant has proposed some area of green roof identified on the roof plans, however it does not occupy the maximum area available and therefore does not meet requirements of DM 6.5. In particular, the green roof should extend underneath all PV array, as they are compatible uses of the space (microclimate benefits of green roof on PV efficiency). The applicant is requested to amend the roof plans to reflect the above, and demonstrate maximum roof area take up by green roofs. All roofs should be biodiversity based extensive substrate roofs with a minimum substrate depth of 80-150mm. A commitment should be made to inclusion of bird (and where appropriate bat) boxes - the number of these to be provided should be specified and they should be identified on the relevant plans. Other proposals to enhance biodiversity through landscape design and appropriate management should also be detailed, building on the recommendations of any surveys/ecologist's report.	Extensive Green Roofs now on all available Roof Space, with correct substrate depths. 'Brown' roofs shall be located under PV array for maintenance issues. The provision of bird and bat boxes has already been discussed above and details of the enhancement of biodiversity are provided within section 6 of the Design and Access Statement.
	Adaptation	Details of how the scheme is adapted to high temperatures (taking climate change into account), including through passive design and passive cooling measures, are required. The energy statement states that there will be a 'slight' likelihood of overheating, has this taken into account projected summer temperatures? This information is required so overheating risk can be identified and designed out where necessary. See Environmental Design SPD for modelling requirements.	A overheating analysis has been undertaken to reflect the worst-case dwelling where no cross ventilation occurs. The dwellings passive measures limit the overheating to 'slight' risk in the summer. This is acceptable from Building Control & Part L of the Building Regulations. A CIBSE overheating analysis has also been undertaken demonstrating that CIBSE Guide A compliance is achieved.
		An outline drainage scheme was submitted with the proposal, however this has not identified the existing versus post development flows on the site, the resulting sub catchments, source controls and methods for managing flows in excess of the design event (SuDS management train). Whilst there are potential areas identified for SuDS on the plan, there is insufficient information provided to assess their acceptability/adequacy . The applicant is asked to provide a SuDS management train, and associated supporting material demonstrating how the scheme achieves improved surface water runoff rates, aiming for greenfield runoff (8l/sec/ha) but as a minimum achieving 50l/sec/ha calculated based on nationally agreed return value period value of 1 in 100yr flood plus 30% allowance for climate change for the worst storm duration. Information should also be provided on how SUDS have been designed to maximise amenity and biodiversity benefits. For guidance see: <a href="http://www.islington.gov.uk/greenplanningguidance">www.islington.gov.uk/greenplanningguidance</a>	Refer to Drawing Nos. 3472-C-100, 101 and 700 and the updated Drainage Assessment Report.
Operational Measures	The Green Performance Plan submitted is not adequate and does not identify monitoring indicators, methods for monitoring, responsibilities for undertaking monitoring, or identify remedial actions to be undertaken if significant performance gap results. An amended GPP is required to be submitted and recommend the applicant look at the Environmental Design SPD for further guidance.	The Green Performance Plan has been amended to suit comments.	
LBI Tree Preservation Officer	RPAs	I am in general agreement with the arboricultural reports submitted and agree with the categorisation of the trees. However, I disagree with the indicated root protection areas (RPA) and the level of impact to the retained trees within the RPA.RPAs have been depicted as a circle, but the BS (BS 5837:2012 Trees in Relation to Design, Demolition and Construction). There is no overriding justification for the incursion into the RPA of the retained trees, therefore we should expect the development to recognise the constraints the trees pose to the site and the footprint of any development be situated outside the RPA. The design and access statement (DAS 3.5) states that all development must be located outside the RPA or canopy spread of any retained tree but this appears to have been ignored in the application.	Sharon Hosegood received email from Jake Tibbetts on 6th May accepting an incursion into the RPA in the area. This is dependent on appropriate soil mitigation to compensate which should be achievable as this area is now being designated as a bio-diverse garden. Subject to an arboricultural method statement
	Light	A further impact on the trees which has not been acknowledged is that T1 –T5 have enjoyed uninterrupted light which will be obscured by the development, the effect will be detrimental to the trees health. In the DAS 8.3 section 4 states that <i>Mature trees in corner of site: Require light directly from the site</i> but direct light will be blocked by the six storey residential block.	Trees will be receiving light from all other aspects and the ash trees are reasonably shade tolerant
	Landscaping	The overall themes and layout are generally acceptable but we would need greater detail on some aspects of the design that cannot be left to a conditioned landscaping scheme. The main issues that need to be detailed accurately are the tree soil volumes, permeability of surface treatments and a joined-up approach to the sustainable storm water management and the landscaping. The size of trees proposed for planted is commended but this must also include the rooting/soil volumes sufficient for such trees to reach their canopy potential.	Permeable surfaces are shown on the application drawing. Parameters for soil volume are stated on the drawing as the need for sustainable soil volumes is acknowledged, however, the design of underground cellular containment is an in-depth technical exercise, requiring input across all disciplines and as such would be provided at a later stage in detail design.

Consultee	Topic	Detailed Comment	Response
	Play Areas	The incidental play areas indicated are misleading - surely anywhere can be an incidental play area. John Winder in public realm would normally comment on play space. Greater detail would be required by an arboricultural method statement to ensure the safe retention of T6 – T8.	An arboricultural method statement will be provided. The play areas indicated within the updated landscape section of the DAS are reasonable and in accordance with the Mayor's SPD on Play and Informal Recreation.
	Entrance Avenue	I am not a fan of the chanticleer pears indicated - they have been overplanted in recent years and the fruit and basal suckering can be an issue, so we would expect to see alternative's suggested. We would need to see greater tree pit detail and again sufficient soil volumes indicated for the these trees.	Comment on tree species noted, an alternative has been proposed within the updated documents as well as parameters for tree pit design.
	Frontage to Parkhurst Road	The use of large canopy trees at a substantial size at planting for immediate impact is indicated but as previously mentioned these need to be accompanied by the soil volumes required, so that these trees can reach their canopy potential. This needs to be incorporated into the design and we would expect to see the industry recognised soil volumes recommended by companies such as Greenleaf.	Addressed in comments above
	North Boundary	It is unclear how the potential future link to the neighbouring site will co-exist with the retained trees due to the level changes, boundary changes etc.	This will be addressed in the arboricultural method statement. The future link if implemented would require construction of a ramp on the north side of the boundary. It would not necessitate excavation within root protection areas.
		There is a lot of hard landscaping within the RPAs on the north boundary, cycle stores, new boundaries, installation of railings at existing boundary, gates, soil reinstatement and hard surfaces. The cumulative effect of all these incursions on the RPA will have a detrimental effect on the trees and while the effects can be partially mitigated by an arboricultural method statement the effects on the trees should be lessened. We require the impact on any corrected RPA to be minimised. We are not obliged to accept any incursion into the RPA of a retained tree.	This will be addressed in the arboricultural method statement
	Resin bound footpaths right under the trees if no-dig will result in a level change and a reduction in the permeability of the RPA. Resin bound gravel requires a compacted sub-base which will be impermeable and therefore unacceptable within the trees RPA.	Permeability within the RPA will be increased significantly, not reduced as the existing in-situ concrete surface will be removed. It will not be necessary to excavate within the rooting zone of trees to construct the footpath.	
	Planting	We would expect a planting maintenance plan to be for 5 years rather than the 3 stated in the DAS.	Noted.
<b>LBI Pollution Projects Team</b>	Internal Noise	The applicant will need to provide further details at a later date to demonstrate compliance with the internal noise levels, with the Parkhurst Road façade requiring closed windows and hence mechanical ventilation to meet this requirement. The self-noise of any mechanical extract should be included in these details. With the poor air quality on this side, any ventilation should draw air in from the cleaner side or from the rooftop.	Noted.
	Condition	"A scheme for sound insulation and noise control measures shall be submitted to and approved in writing by the Local Planning Authority prior to any superstructure works commencing on site. The sound insulation and noise control measures shall achieve the following internal noise targets (in line with BS 8233:1999):Bedrooms (23.00-07.00 hrs) 30 dB LAeq, and 45 dB Lmax (fast) Living Rooms (07.00-23.00 hrs) 35 dB LAeq, Kitchens, bathrooms, WC compartments and utility rooms (07.00 -23.00 hrs) 45 dB LAeq. The sound insulation and noise control measures shall be carried out strictly in accordance with the details so approved, shall be implemented prior to the first occupation of the development hereby approved, shall be maintained as such thereafter and no change therefrom shall take place without the prior written consent of the Local Planning Authority."	Agreed
	Balconies	There are balconies along the Parkhurst Road façade and if they must be orientated this way I'd advise that the balcony walls/glazing is of a solid construction with sufficient height and no perforations or gaps to provide an effective noise barrier.	The balconies have been removed from the Parkhurst Rd façade
	Conditions	The plans propose a new substation directly adjoining the residential accommodation. To protect amenity I'd advise the following two conditions: "The design and installation of new items of fixed plant shall be such that when operating the cumulative noise level LAeq Tr arising from the proposed plant, measured or predicted at 1m from the facade of the nearest noise sensitive premises, shall be a rating level of at least 5dB(A) below the background noise level LAF90 Tbg. The measurement and/or prediction of the noise should be carried out in accordance with the methodology contained within BS 4142: 1997."	N/A Agreed
		"Full particulars and details of a scheme for sound insulation between the proposed substation and residential use of the building shall be submitted to and approved in writing by the Local Planning Authority prior to superstructure works commencing on site. The sound insulation and noise control measures shall be carried out strictly in accordance with the details so approved, shall be implemented prior to the first occupation of the development hereby approved, shall be maintained as such thereafter and no change therefrom shall take place without the prior written consent of the Local Planning Authority."	Agreed
	Demolition/Construction	Finally with all the demolition and construction to take place, I'd advise the following condition to minimise the impact to the neighbourhood: "A Construction Environmental Management Plan assessing the environmental impacts (including (but not limited to) noise, air quality including dust, smoke and odour, vibration and TV reception) of the development shall be submitted to and approved in writing by the Local Planning Authority prior to any works commencing on site. The report shall assess impacts during the construction phase of the development on nearby residents and other occupiers together with means of mitigating any identified impacts. The development shall be carried out strictly in accordance with the details so approved and no change therefrom shall take place without the prior written consent of the Local Planning Authority."	Agreed
<b>LBI Access Officer</b>	Wheelchair Units	Firstly, I'd be grateful if you would confirm that the following breakdown of the wheelchair accessible/adaptable units (based on pages 62 to 68 of the submitted Design and Access Statement) is correct (I'll assume the reference to an adaptable 3-bed family unit at ground floor level in block F at page 62 of the Design and Access Statement is an error):  - Private (12 units, 30 hab rooms): 7x 1b2p (ground floor), 2x 2b3p (ground floor), 2x 2b4p (ground floor) 1x 3b5p (ground floor). - Social Rent (2 units, 9 hab rooms): 1x 4b6p (ground floor), 1x 3b5p (second floor). - Intermediate (1 unit, 2 hab rooms): 1x 1b2p (ground floor).	The current scheme has 11 wheelchair accessible/adaptable unit s(this equates to 10% of the units/habitable rooms in the current scheme) – 2 no. one bedroom flats; 4 no..two bedroom three person flats; 3 no. two bedroom four person flats; and 2 no.3 bedroom five person flats.
		Could you clarify why so many (7 of the 12) of the private wheelchair accessible/adaptable units are 1-bed units?	Please see response above, the mix has now been revised.
	Electric Wheelchair Storage/Charging	Regarding 6 of the private and the sole intermediate wheelchair accessible/adaptable unit, I note that the front doors of these units open directly into living rooms, with no hall/lobby or discrete space to store/charge an electric wheelchair. I note the comment under section 8.5 of the Access Statement regarding the removal of a store to provide the required space - could you clarify where in these units this space could be provided?	In the current scheme none of the wheelchair accessible flats open directly into a living room and all are provided with a wheelchair storage/charging area.
	Access to car parking	Paragraph 4.4 of the Access Statement could have provided more clarification regarding how the basement car park would be accessed by the occupants of the social rent and intermediate wheelchair accessible/adaptable units, for example in relation to fob access, and travel distances (I note that although the occupants of one of the social rent units may be allocated one of the street-level spaces, the occupants of the other social rent unit would have to travel a significant distance to their basement parking space).	The basement car park has been removed in the revised scheme.
		I assume the ramp into the car park is not intended for use by wheelchair users, mobility scooter users and ambulant disabled cyclists - is that correct?	Please see above response.

Consultee	Topic	Detailed Comment	Response
	Lifetime Homes/Flexible Homes	<p>With regard to the general needs housing, I am please to note your team's references (at paragraph 4.3 of the Planning Statement and elsewhere) to Lifetime Homes standards and your acknowledgement of Islington's Flexible Homes standards, however I note the following:</p> <ul style="list-style-type: none"> <li>- Some bathrooms are non-compliant insofar as their doors open outwards and there is insufficient manoeuvring space between the WC and bath.</li> <li>- The proposed duplex units do not show locations for a through-floor lift.</li> <li>- Not all main bedrooms show a 750mm clear space at the foot of the bed.</li> <li>- Units A.3.1 and A.3.2 appear to have no step-free access - is this an error?</li> </ul>	The revised layouts are compliant with requirements of Islington's flexible homes standards - see section 5.7 of the Design and Access Statement and the Access Statement
Streetbook Surgery	Views/Heritage	<p>All of the views requested at the last meeting have been considered and provided; they will provide useful contextual information against which the revised proposal can be assessed. It would be useful to have a photomontage of this view (below) to show the views through the site, past the chamfered building and also the views of the path directly ahead leading to the building at the north end of the site. The Historic Environment Report does not yet provide the type of detailed advice and guidance required to inform the revised proposals. Detailed guidance from the Heritage Consultant is needed on:</p> <ol style="list-style-type: none"> <li>a. appropriate building heights (eaves and ridge heights)</li> <li>b. suitable proportions (bulk and massing) on the Parkhurst Road frontage and at the centre and north end of the site and</li> <li>c. which views are particularly important.</li> </ol>	In the first Streetbook surgery (6 <sup>th</sup> November 2013) LBI officers asked for additional verified views and at the second meeting an internal view of the scheme was requested – these views are provided as part of the revised submission. Officers also requested that guidance on Parkhurst Road frontage should be included in the Historic Environment Report. All this information is now included in the Design and Access statement and the Historic Environment Report.
	Permeability	<p>The Space Syntax methodology should be clearly explained in the document, as should any assumptions made in respect of which barriers to movement are fixed or, conversely, can be removed.</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Pedestrian and cyclist count figures have been included in the draft document, and it should be explained how these have informed the analysis later in the document.</li> <li><input type="checkbox"/> Clarification is also required on the relationship between the accessibility levels (indicated with colour) and pedestrian counts.</li> <li><input type="checkbox"/> Pedestrian and cyclist count information should include movements to/from the recently-completed cadet centre.</li> <li><input type="checkbox"/> Details of when and for how long pedestrian and cyclist information was gathered should also be provided.</li> <li><input type="checkbox"/> 2 options for new routes are referred to in the document, however more than 2 scenarios have been tested in the later pages of the document. A further scenario, where a new north-south route is connected to the access road to the side of McCall House (but without east-west access behind McCall House and Hollins House being provided) should also be tested.</li> <li><input type="checkbox"/> The reference to an "existing" connection on page 28 of the draft document should be explained, as no such link currently exists.</li> <li><input type="checkbox"/> The document's conclusions and recommendations (including those illustrated on page 5) should be clarified, with reference to the various scenarios tested.</li> </ul> <p>An appraisal of existing cycle routes in the area has been provided; there are none in the immediate vicinity and the proposal contributes no new facility for cyclists. However, it is understood that ICAG and the LCC have been pressing for improvements in the area; these should be explored.</p>	These points have been considered and further detail is provided within the Design and Access Statement.
		<p>Permeability: A Space Syntax study (April 2014) has been commenced, which examines existing networks and block sizes, in an effort to establish optimum permeability/ connectivity. The study – when completed – will usefully inform officers' further comments on the proposed development. The analysis provides legibility information based on the number of turns in a route but does not take into account other factors that critically influence legibility (and influence a pedestrian's perception and decision whether or not to continue a journey) along a particular route, such as the existence and visibility of landmarks, the quality and character of private or public spaces, ground floor treatments, safety and security, and points of interest. These factors should be taken into account in the final analysis.</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> The study should also explore the existing and new desire lines in the area and that the new development will generate; journeys to school, play facilities, transport links, retail and leisure activities. Further work is needed to demonstrate that the new community will be adequately connected and that routes to, through and around the site are legible and logical without recourse to excessive signage.</li> </ul>	The permeability of the site is considered in section 5 of the Design and Access Statement.
		<p>The space syntax study concludes that "the desire line is for an east-west connection and our proposal for a 'future proofed' route therefore improves this east-west connection". Future-proofing is understood to mean that shape and form, the essential infrastructure, are in place to meet diverse and changing needs over time. That cannot be said of the current proposal, where the built form obstructs a legible and logical connection and nothing is proposed to facilitate that connection.</p>	As requested provision has been made for a future proofed north south route through the site. The design of the scheme has been amended to ensure this is legible and has a feeling of safety and security. The potential for this route to be opened to the north is outwith the applicants control.
		<p>From the Secure by Design perspective, it will be necessary to demonstrate that good sightlines and all surveillance opportunities have been fully exploited to enhance the security of the route. There is still no information on the lighting and seating that will be installed across the site and that will affect visitor experience and behaviour.</p>	The layout of the scheme provides good natural surveillance to all landscaped areas and public and private routes and amenities. Balconies and ground floor entrances have been locates to activate these areas. A landscape lighting scheme has been included in the scheme - see section 6.3 of the Design and Access Statement.
	Conservation and Design	<p>Work has been done to improve legibility within the site by, for example, removing the basement ramp. Improvements have also been made, in terms the height and design, to Building F but there are outstanding concerns in relations to its height, bulk and massing. The set-back roof extension, when viewed from the conservation area, reads as a full additional storey. It is therefore recommended that the roof extension be set in from both sides. The reduction in the height of block E is welcome as it will improve the visual impacts on the setting of the conservation area and locally listed buildings. However, the 'chipping away' of the heights and the creation of setbacks to improve bulk and massing could create an obscure and wedding cake effect and should be avoided. The proposed balcony and walkway railings, which have been introduced to some of the elevations, have introduced a harshness that might be improved by the reintroduction of glazed screens.</p>	Attic storey block F – this has been set back on all sides facing the conservation area The massing of block E is explained in section 5.4.1 of the Design and Access Statement Detail of walkways- the walkway balustrades are glazed as requested - see section 5.4.2 of the Design and Access Statement
	Play	<p>Information has been provided on the anticipated number of children who will move into the development and their play requirements. No wider study has been undertaken of the supply of, and demand for, the full range of play facilities in the area. It is important to establish whether there is sufficient capacity nearby to accommodate the additional youngsters the new development will bring into the site, what enhancement might be necessary and what financial contribution might be appropriate. That capacity study should take into account the challenges and opportunities identified by the residents (children and young families) of Hollins and McCall Houses.</p> <p>The lack of strategic thinking, in relation to the provision of play space on the site, gives cause for concern. Two of the green areas that are identified as informal 'play spaces' are marginal, relatively remote, pockets that are unlikely to feel safe and/or welcoming for children. The off-site facilities are 250-540m away which, whilst within allowable limits, is unnecessary given the opportunity that exists to open up a route to the north of the site.</p>	Islington's own play facilities audit is referenced in the DAS, this was the info provided in response to our request for data about play area usage in the area. We believe the level of information provided is proportionate to the application.  The accessibility and suitability of off-site facilities is described in the DAS. The scheme does not preclude the future possibility of opening up the site on the north boundary.

Consultee	Topic	Detailed Comment	Response
	Landscape	The embodied energy of materials proposed within the landscaping strategy should be minimised, and opportunities for integration of re-used and recycled content should be maximised. Details should be provided on material use and source as part of the landscaping strategy	Recycled content and embodied energy has been considered in the landscape proposals. For instance block paving noted on the drawing includes recycled content and energy used in production from 100% renewable source. However, the specific detail of material choices would be a matter for consideration when submitting for discharge of conditions.
	Sustainability	An updated drainage/SuDS strategy has not yet been submitted to reflect the revised development proposal. Any new strategy should address fundamental concerns that the original scheme failed to integrate surface water management within the landscaping; water should be managed on the surface wherever possible and opportunities to deliver gains for biodiversity and amenity on the site, exploited. SuDs should also be integrated into the tree planting, utilising the rooting volumes required for the proposed tree planting.	Refer to Drawing Nos. 3472-C-100, 101 and 700 and the updated Drainage Assessment Report.
	Routes through the site - user experience	The route into the site is no longer a shared space (which is welcome) there is a designated footway to the east but it is not clear how it is delineated, whether there is a kerb or just a tonal contrast. The former would provide a less ambiguous environment and also the facility for taxis to drop residents and visitors. There is still very little information available on the treatment of the entrance, how it will invite pedestrians in (to use the play area for instance) and yet exclude unauthorised vehicles. It was suggested that planting in the area could be vulnerable to accidental/deliberate damage.	The footway is delineated by an upstand kerb as well as tonal contrast between road and footway surface. Detail of the entrance plaza and play area is described within the landscape chapter of the DAS and on the landscape layout drawing. As was explained at the 6th May 2014 Streetbook Surgery the routes through the site are clearly segregated between vehicular and pedestrian users. The pedestrian path alongside block F and E is separated by a nominal upstand kerb and planting.
	PERS	Accessibility: The PERS survey does take account of the barriers faced by older and disabled people. However, the findings were presented in percentage terms, which reveal little. The actual difficulties that exist should be made explicit and measures to mitigate their effect considered.	At the Streetbook Surgery it was requested that the PERS report be expanded to include certain additional information – it was explained that the report is a standard format and methodology and that the additional information requested isn't part of a PERS report. The PERS audit should be used by the council to help decide where they feel that the most useful improvements can be made.
	Mobility Scooters	A storage and charging facility for mobility scooters is provided and is, in principle, welcome. However, it should be noted that mobility scooter users are not necessarily wheelchair users (they could occupy any one of the residential units on site) and almost by definition, they will not be using the drop off point. Critically, the distance between the dwelling and the store should be kept to a minimum. Storage and charging facilities should therefore be located close to the lift, within each circulation core, but should be separated from the protected evacuation route. It is disappointing that the provision of cycle parking facilities falls short of that established in the Council's Development Management Policies. Some provision should also be made for the inclusion of some accessible cycle storage, at least for use by ambulant disabled people. The central safe drop off point and kerb is welcome but it is doubtful whether it will be sufficient to meet the needs of all residents. The overall distance from that bay to the front door of each dwelling it serves should be no more than 75m, preferably less. Additional drop off points along the entry route, with a kerb to the adjacent path, could presumably be provided.	At the 6th May 2014 Streetbook Surgery LBI officers requested that the mobility scooter store and recharge areas should be located as near as possible to the flats. The stores are now located at ground level adjacent to the lift cores – see drawing 13033 AA 00 110 P02. Whilst there is a dedicated drop off point it is accepted that if the access road is clear, and stopping would not cause congestion, vehicles could stop along the access road adjacent to some of the blocks. The provision of cycle parking has already been discussed above and further detail is included in section 3 of the Transport Assessment.
	Swept Path	Swept path analyses for refuse trucks and emergency vehicles are being produced, as information on the turning circle of the former has now been provided. As it stands, any larger vehicles would be barred from the site, including furniture removal vans. More information is requested on the type and frequency of vehicles servicing the cadet centre.	Large vehicles would not be able to turn within the site, without prior arrangement to use the TA centre. There are many residential streets in London / LBI where this size of vehicle can not manoeuvre. The servicing of the TA centre will be minimal as is not affected by the size of our turning head.
		Within the site, the chicane (necessitated by the swept path of delivery vehicles) is intended as a behaviour modifier. The access route to the properties at the northern edge of the site, which would be used by cyclists and pedestrians, is too narrow and appears as a pinch point as opposed to a safe, legible access route.	The access route is adequate for its expected usage.
	Parking	The number of on-site parking bays has reduced to two. The removal of the basement car park is welcome but the alternative transport options that would be available to older and disabled people are not clear. The location of the two bays tends to obscure views into the site and specifically into the play area; they would also be more conveniently located on the other site of the access road, adjacent to the residential block they serve. However, it seems, the present location is dictated by the swept path of delivery vehicles to the site, turning in the cadet centre entrance. The alternatives available are on street bays but it is for the developer to locate possible positions for those bays, within 75m of the associated dwelling. On Parkhurst Road, permission would have to be obtained from TfL, which has plans to alter the way in which the road is used; possible plans include the reallocation of kerbside space for cycle routes and two-way bus lanes	The location of the accessible bays is dictated by the swept path of delivery vehicles and cannot be altered. The trees located by the accessible bays will have a canopy height above eye level and will not obstruct views into the site. The applicant has agreed to make a financial contribution to the provision of off site accessible parking.
	Landscaping	The quality of light and warmth will be poor across the bio-diversity area, which will dictate what planting choices are viable.	It is acknowledged that the light levels in these areas will be reduced by shading. However we see this as an opportunity to develop a specific planting character, that of a woodland understory. This will be a significant improvement in habitat value as the site is currently an expanse of in-situ concrete.
		The amount of publicly accessible green space on site is still woefully small and, unless or until the north south through route is opened up, the two small garden spaces (on the northern boundary and the 'biodiverse garden') would benefit from attractors - such as natural play features - to reduce the likelihood that they will become stagnant and or misused spaces. The transformation of the central node to a pedestrian-only area is welcome but the 'urban' character of the central play fails to increase options for natural play, which would additionally provide an opportunity for more planting. Further information is requested on the ground floor treatments (uses and activity levels) of the accommodation that faces onto the play area/square. It is unclear whether or how the peripheral additional play spaces could be animated/made playable.	We have opted to provide one area for natural play only, where a concentration of playable elements [as described in the DAS and on the landscape plan] will provide a meaningful focus for young children to play in a natural setting. The play area in the central area will include planting and sensory elements but as described in the meeting we do not consider the tag of natural play to be appropriate in every situation.

Consultee	Topic	Detailed Comment	Response
	Trees	Trees: The revised proposal takes account of the root protection areas (RPAs) of the existing trees. As a result, the trees should be successfully retained, assuming the application is supported by an Arboricultural Method Statement (AMS). Improvements have been made to the permeability of the surface treatments but further information is required to ensure that the hard surfaces under the trees are permeable. For the new trees proposed, sufficient soil volumes are required to ensure that they can achieve their canopy potentials; the industry recommendations, of 20 m2 for medium sized and 30m2 for large canopy trees, should be followed. The numbers of proposed trees is satisfactory; the species can be determined at a later date. Notwithstanding this, the applicant's commitment to use large canopy species where space exists is welcome. It should be noted that London Planes may have an import ban by the commencement of landscaping and an alternative should be sought.	Noted.
	SuDS/Landscaping	<p>The site-wide drainage scheme has been further developed, however, the latent opportunities to integrate SuDS into the landscaping strategy have been underutilised. Those opportunities include:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> the 'biodiversity' space,</li> <li><input type="checkbox"/> the landscaped strip to the rear of the site,</li> <li><input type="checkbox"/> trees</li> <li><input type="checkbox"/> bioretention planters/garden beds.</li> </ul> <p>A more integrated approach to landscaping on the site is required introducing SuDS to each sub-catchment of the site, maximising source control, water quality improvement opportunities, and conveyance through the site (addressing all the SuDS criterion of DM6.6). As currently proposed, the water feature is a pumped feature using treated water; this is not a favoured 'natural' play solution, as it does not have dual functionality, it will not have any SuDS purpose and is energy intensive. The 'biodiversity space', proposed for the north eastern portion of the site, presently reads more as a left over space, rather than an integral and valued part of the overall design. It will be heavily shaded by the proposed development as well as from the canopies of the existing trees in this space, which will limit the available light, warmth and rainfall, which will in turn limit the available planting choices and demand an appropriate and site-specific biodiversity management regime. In any event, careful consideration will be required of the ways to improve the biodiversity value of this area, such as artificial bird and bat boxes that might be introduced.</p> <p>A sustainable drainage proposal is being updated; it should identify drainage opportunities and constraints, showing flow routes through the site and the location of potential SUDS features.</p> <p>The rill (water feature) gives cause for concern:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> The water appears to connect the more 'public' play space to the 'private' play space beyond the gates, which gives an unhelpful message about the segregation of residents' facilities. The design of the central courtyard remains unresolved.</li> <li><input type="checkbox"/> Whilst a potentially interesting and enjoyable part of the landscape and natural play, it is inappropriate that the feature forms part of a pedestrian route. For older and disabled people, for those with visual, cognitive and or mobility impairments, it is potentially hazardous.</li> <li><input type="checkbox"/> The feature should, if at all possible, serve a dual function and provide some SUDS value. A guide on 'Water play with Rainwater and Sustainable Drainage' produced by Planet Earth and London Play is attached, which demonstrates how SuDS and water play can be safely integrated, either as intermittent or unlimited water play. These principles should be adopted in order to deliver a more dynamic water management/landscape design.</li> </ul>	<p>Refer to Drawing Nos. 3472-C-100, 101 and 700 and the updated Drainage Assessment Report. Other than providing permeable surfaces there are no reasonably practical means of providing additional SuDS features within the biodiversity garden/natural play area and along the north boundary as the priority here is to minimise excavation to protect the roots of existing trees. It should be taken into account that an impermeable surface is being removed and replaced with soft landscaping and permeable hard landscape surfaces. In other areas, underground soil vaults will be provided for the large new trees that have been proposed, these will receive surface water and act as an irrigation store. Where levels permit, the design of rear garden spaces will incorporate rain gardens.</p> <p>Shading of the biodiversity areas has been addressed above.</p> <p>Refer to Drawing Nos. 3472-C-100, 101 and 700 and the updated Drainage Assessment Report.</p> <p>Comments have been addressed and the water feature [rill] has been removed from the scheme.</p>