

**Preliminary Response to Proposals from GLE Residents**

1 March 2017 v.3

Our principal concerns are that the increase of the school to two-form entry and the excessive number of housing units on the site have resulted in enormous pressure on the site and means that there is no room to design the scheme in a way that is sensitive to the neighbours; for example the school hall, instead of being integrated into the school is stuck out into the middle of the playground; on land that is currently within the curtilage of the listed Golden Lane Estate.

In summary no-one on the Golden Lane Estate that we have discussed this with has an objection to the principle of either the school or social housing, but the unanimous view is that there is room on the site for either the school, or the housing, but not both at the scale that is currently proposed.

	Issue	Proposal	Comment	Desired Outcome
1.1	Programme	The programme was stated as follows: April 2017 planning application to be submitted. Start on site January 2018; school open September 2019	The consultation period is too short – Residents have been asking for information for two years. This is a very ambitious timeline to understand consultation feedback, determine meaningful changes, agree proposed changes to the plan with the client, and then update the detailed plans.	Further time for design development to incorporate comments is required. Further design development is required to achieve a high quality scheme. Details provided are sketchy at this stage. In due course the proposed planning drawings should be presented to Residents for comment <u>prior to submission</u> with time for comment/engagement.
2.1	Impact on Heritage Asset and Conservation Area/Context	The Finsbury Local Plan identifies the RCS site (Site BC34) noting that "proposed buildings must be sensitively designed to minimize impacts on neighbouring buildings"	There is no relationship between the design of the tower block and the scale or detailing of Stanley Cohen House. The location of the proposed School Hall impacts negatively on the original masterplan of the site.	The scale of the housing should be reduced to relate better to the listed Estate. The location of the School Hall should be re-thought.

	Issue	Proposal	Comment	Desired Outcome
2.2	Context	The requirements of the brief have forced the residential block to expand across the full width of the Golden Lane boundary	The residential block comes very close to the amenity spaces of Stanley Cohen House.	The residential block should be reduced away from the boundary with GLE to reduce the impact on the open amenity areas.
2.3	Context	The Finsbury Local Plan identifies the RCS site (Site BC34) noting that "proposals should also conserve and enhance heritage assets, including... the Golden Lane Estate"	The relationship with the listed Estate is very poor. The scheme dominates the heritage asset of Golden Lane Estate.	Proposals should be brought forward that demonstrate how the existing heritage assets are to be conserved and enhanced in this scheme.
2.4	Context	Housing element situated along Golden Lane frontage	The proposed 14 storey housing block on an elongated footprint presents itself as a high wall, rather than a slender tower, and will be interfere with key views across the estate, and in particular the refurbished Great Arthur House.	The housing component is overpowering the exemplary Grade II listed Golden Lane Estate, and Basterfield and Stanley Cohen House in particular. Any new scheme at the fringe of the listed estate should be subservient to it, and there must be an intelligent response to the heritage asset.
3.1	Density (School)	Proposals increase the school population from approx 80 to 458	It is noted that the single form entry proposal has been increased to two form entry due to conditions imposed by the Education Funding Agency. The five fold increase in pupils on site puts unacceptable constraints on the site layout and density.	Proposal should be reduced to single form entry, or the housing element should be removed/reduced to accommodate the larger school.
3.2	Density (Housing)	Proposals are for 72 housing units. It was suggested by CoL that the social housing aspect outweighed the planning policy issues of the site.	The choice of the tower typology is inappropriate for the site as it results in an overly inflated scheme. A tower with a smaller footprint further away from the estate boundary would be less viable, and therefore the size has been driven by efficiency considerations rather than a sensitive approach to the urban context.	Proposals should be brought forward that reduce the housing to meet Islington's published planning policy constraints.

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3.3	Density (Housing)	Proposal is for 72 units on approximately 0.06 hectares site. Proposal is for up to 188 habitable rooms which would give a density of 3133 hr/ha	Maximum anticipated Density standard in the London plan is for 650-1100 hr/ha (with PTAL rating of 6 in Central zone) Table 3.2 of London Plan.	Reduce density of housing to no more than 66 habitable rooms in line with London Plan policy.
4.1	Amenity (Housing)	The plans show no amenity areas available to the housing other than private balconies	Insufficient amenity space will result on greater pressure and use of GLE amenity space. Islington Development Management Policy DM6.2 (para 6.20) states: <i>“Given the pressures on public open space within the borough and population increases, additional public open space should be provided in new development based on the following standards: 5.21m2 per resident”</i>	Public open amenity space should be provided in accordance with Islington policy
4.2	Air Quality	The proposed development is in an area that has some of the highest levels of pollution in the country due to its location, at the heart of London, and the density of development. National health based objectives for the pollutants nitrogen dioxide (NO2) and small particles (PM10) are not being met in the City, so the whole of the Square Mile has been declared an Air Quality Management Area.	Islington Development Management Policy states that: <i>The council will take into account the impact of existing air quality on development proposals, including the suitability of the site for occupation for the proposed use, based on the air quality that potential occupants will be exposed to.</i> The over-development of the site and increased traffic generated by the school use is likely to negatively impact air quality in the area.	An impact assessment on increased traffic generated by the school should be brought forward to include an assessment of the impact on air quality. The density of housing should be reduced to avoid further impact on the air quality on the site.

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5.1	Form and Massing (Housing)	The residential block is proposed as 14 storeys with approx 6 units on each floor above the ground floor level.	The resultant residential tower would be on the scale of Great Arthur House and would exceed Islington Planning Policy BC9 and the urban design study of 2010 set out in the Finsbury Local Plan (Figure 17, "Tall buildings and contextual considerations for building heights")	The tower block should be reduced in height to no higher than the prevailing 4-6 storeys
5.2	Form and Massing (Housing)	The residential block is along Golden Lane; the school at the North of the site and the School Hall separate in the SW corner of the site	The general arrangement makes sense, but one of the defining characteristics of GLE is the long views under/through buildings and this appears to be a missed opportunity. The position of the school hall is problematic.	More openness should be evident in the design. School Hall should be relocated to connect with the school building.
5.3	Form and Massing/ Layout (Housing)	At 15.6m, the depth of the tower will block views from habitable rooms in Basterfield House resulting in an overwhelming sense of enclosure and loss of daylight	The tower block is currently shown misaligned with the site boundary. If this is corrected the effect on Basterfield may be made worse.	Daylighting study to be provided for the windows to habitable rooms in the North East end of Basterfield House. Tower block
5.4	Form and Massing (School)	The school building volume is set against and therefore reads as a continuation of Hatfield House	This layout is in conflict with the staggered nature of the residential blocks on GLE.	Any new scheme at the fringe of the listed estate should be subservient to it, and there must be a developed response to the heritage asset.
5.5	Form and Massing/ Layout (Housing)	The 14 storey tower block is only 8.5m away from Basterfield House and impacts adversely on the open space around Basterfield House.	In comparison to Great Arthur House there is no space around the tower block - it comes right up to the boundary of the site with GLE. As a result it uses the amenity space of GLE as "part of its setting". It is a bad neighbour.	The residential element needs to be reduced in size and set within the site, not butting up to the boundary with GLE.
5.6	Paving line	The sheltered arcade under Stanley Cohen House should determine the paving edge line	The existing arcade is not presently shown on the drawings.	Greater detail on the existing adjacent buildings and street line should be included in the plans to assess the relationship.

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5.7	Blank Facade	More than 50% of the facade of the new housing block at street level comprises rubbish store, substation, cold water storage tank or generator.	It is not compatible with modern notions of urban design and placemaking that a street facade that will be predominantly blank. This will cause an unpleasant and unneighbourly street frontage with no interest and consequent issues around security. All over London these blank facades are being got rid of. We felt this aspect of the design is unacceptably poor and will reflect badly on the City of London's design standards. To quote Islington's Local Plan: <i>"Premises shall provide and retain clear views into and out of shop windows... to contribute to the attractiveness, safety and vitality of the Town Centre and avoid blank frontages to the street"</i> .	All these uses could be moved into the basement of the tower block, freeing up the ground floor for uses such as - separate community entrance to the Sports Hall or other appropriate uses such as a "corner shop", cultural use, gallery/arts space (integrating with the City of London's new Arts Quarter initiative) or workshop.
6.1	Incorrect plans	The Housing plans do not show windows to the bedrooms	It is not possible to adequately assess the impact of overlooking, or whether the housing complies with relevant standards from the plans provided	Plans are to be revised to show window positions in housing bedrooms and re-presented for further consultation.
6.2	Missing Information	Boundary Information is incomplete on the drawings	It was not possible to fully assess the scheme without correct boundary information. Existing landscaping details should be shown on plans.	Provide an updated ground floor plan which clearly shows a scale view incorporating: <ul style="list-style-type: none"> <li>•The new site boundary</li> <li>•The current and pre-existing Islington and City Of London borough boundaries</li> <li>•The current and pre-existing Golden Lane Estate boundary</li> <li>•The existing building structures (eg garages, COLCEC, substation, Basterfield House), Access Mews and street furniture (eg bollards and access gate).</li> </ul>

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6.3	Information required	No imagery was provided at the consultation of the Southern Boundary of the site.	Not clear from the consultation what the effect will be on the Basterfield Access Mews and Boundary and the extent of any landscaping or boundary treatment.	More detail on the proposed fencing / wall / planting that separates between Basterfield House and the site, and how this area will look from ground floor level along this area.
6.4	Missing Information	No information provided on storage of refuse	Not clear on how rubbish is stored, handled or collected from school, Sports Hall, Kitchens or residential block. Having seen and discussed with residents at the Barbican the extent of external bin storage area for the Prior Weston school nearby in Golden Lane we feel that the extent of this problem has not been comprehended by the design team.	Full details of refuse enclosures, handling and collection to be provided.
6.5	Overlooking	Residential element will overlook habitable rooms to Basterfield House	Due to the proximity of the proposed block, new and existing flats will overlook each other.	Screening should be provided to ensure that overlooking does not occur between flats
7.1	Tenure	Residential element is shown as single-tenure social housing.	Single tenure social housing tower blocks are questionable from a social inclusion perspective. Current planning policies promote 'mixed tenure' and 'tenure blind' typologies, which can be better achieved with 'low rise, high density' schemes. Rather than insisting on the distribution of social and affordable housing across the city as intended to achieve a healthy urban mix of people, the client of the scheme uses section 106 contributions to fund a development where social tenants are concentrated in one location, which nurtures stigmatisation and undermines integration. This is a rather outdated model of providing socially rented accommodation.	<p>The single-tenure social housing decision needs to be justified as it is contrary to policy.</p> <p><i>London Plan Policy (<a href="https://www.london.gov.uk/what-we-do/planning/london-plan/current-london-plan/london-plan-chapter-3/policy-35-quality-and">https://www.london.gov.uk/what-we-do/planning/london-plan/current-london-plan/london-plan-chapter-3/policy-35-quality-and</a>):</i></p> <p><i>“social inclusion objectives and should be conceived and developed through an effective design process”</i></p>

<b>Effect on Golden Lane Estate</b>
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8.1	Basterfield Access Mews	Access points are shown to the RCS site from the Basterfield Access Mews, both to the playground and for the school kitchens and the Sports Hall Community Uses.		The RCS site should not be serviced from the Golden Lane Estate in any way. It should be self-contained and servicing for the school kitchen etc should be self-contained within the RCS site.
8.2	Basterfield Access Mews	Part of the Access Mews that is currently pedestrian is shown with traffic in the proposal.	The Access Mews traffic should be reduced. No increase in the use of the Access Mews is acceptable	The RCS site should not use the Basterfield Access Mews in any way.
8.3	Basterfield Access Mews	The proposal assumes use of the Basterfield Access Mews.	This road is part of the GLE and residents pay for the upkeep of the road through their service charges as demonstrated on Lease Plans.	The Basterfield Access Mews should not be incorporated into the RCS site. The RCS site must be independent.
8.4	Basterfield Access Mews	One of the drawings depicts a bench along this space.	This will encourage non-residents to gather and linger and can become a focal point for potentially anti-social behaviour, as the area is not generally over-looked. We already have instances where children climb up on the garages that exist there.	Avoid new street furniture that encourages lingering/ gathering.
8.5	Basterfield Access Mews	There is currently a gate to this mews which is manually closed after 7pm	The existing access gate to the service road should be changed to an automatic opening / closing gate with fob key access, with fobs restricted to fire tenders and other designated and approved users. This will help sustain the safety and private nature of the Estate, and ensure this space is a tranquil space to help compensate for the increased noise and disruption generated by the new School.	Basterfield Access Gate should be automated and access control implemented.

	Issue	Proposal	Comment	Desired Outcome
9.1	Curtilage Encroachment /Loss of Garages	The RCS site boundary is shown as "re-aligned" to incorporate garages, currently part of the GLE Estate.	The garages are part of the Golden Lane Estate. They are now rented to residents and are the only garages suitable for disabled residents. They are not part of the Adult Education site. Parking on Golden Lane will be very limited, posing a threat to the serviceability of the existing buildings for daily maintenance etc.	Dedicated disabled and resident car parking along the southern school boundary has to be maintained. Garages should be retained. The RCS site should not be extended to include land that is (and has always been) part of the GLE.
9.2	Curtilage Encroachment	The RCS site boundary is shown as "re-aligned" to incorporate amenity space that is currently part of GLE.	The triangle of land to the West of the garages is currently a paved pedestrian area that is part of the amenity space around GLE. Encroaching on this land will reduce the amenity of GLE, and impact adversely on the setting of the listed building by bringing the school site/building approx 5m closer. Islington Development Management Policy DM6.3 states: <i>"Development is not permitted on semi-private amenity spaces, including open space within housing estates and other similar spaces in the borough not designated as public open space within this document, unless the loss of amenity space is compensated and the development has over-riding planning benefits."</i>	The triangle of land should not be incorporated into the RCS site. It should remain as amenity space for GLE.
9.3	Curtilage Encroachment	The RCS site boundary is shown as "re-aligned" to incorporate amenity space that is currently part of GLE.	This land has always been part of GLE and is shown on the Chamberlin, Powell Bon masterplans and on lease plans and on Management Plans. It is part of the Listed Curtilage.	Land that is part of the GLE listed curtilage should not be incorporated into the RCS site. Listed Building Consent is required should this take place.

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10.1	Amenity/ Golden Lane Allotments	The Golden Lane Allotments are an award winning community project set up by residents in 2010. The proposals show the new School Hall located immediately adjacent to the allotments	The location of the School Hall, immediately to the East of the allotments will shade the allotments during the mornings. Islington Policy DM6.3E states: <i>“Development of private open space is not permitted where there would be a significant individual or cumulative loss of open space/open aspect and/or where there would be a significant impact on amenity, character and appearance, biodiversity, ecological connectivity, cooling effect and/or flood alleviation effect.”</i>	The School Hall should be moved back into the school site away from the boundary with GLE. The Allotments should not be shaded by the development.
10.2	Amenity	There are external amenity areas accessed from the Stanley Cohen staircase which will be in close proximity to the blank facade of the tower	Amenity areas will be less useable due to proximity of tower	Re-site housing element further from Boundary with Stanley Cohen House.
10.3	Amenity/ Landscaping	There are currently mature trees to the boundary between the Golden Lane Allotments and the RCS site	These trees are part of a strip of green that runs in front of Hatfield House	Trees should be retained and shown on plans.
10.4	Amenity/ Planting	There is limited planting shown on the proposals	There should be a planted boundary between the GLE and the RCS site	Detailed landscape proposals should be brought forward including a planted boundary between RCS site and GLE
10.5	Amenity/ Planting	The Finsbury Local Plan identifies the RCS site (Site BC34) noting it falls within an "Area of deficiency in access to nature".	The proposals do not show sufficient detail or developed landscaping proposals.	Public open space should be provided to offset the loss of playground space and to relieve pressure on Fortune Street Park in accordance with Finsbury Plan Policy. Landscape design should be brought forward.

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10.6	Amenity: Wind effects	The tall buildings proposed will cause additional wind at street level	At present there is an issue of excessive wind speed around the base of Great Arthur House. Concern was expressed that this similarly sized and oriented tower block will cause similar effects, but is much closer to existing housing on the site. Loss of amenity will result to residents. Mitigation proposals provided at the consultation - that the access balconies will break-up the facade were not felt to be unscientific und not convincing.	Detailed analysis is to be brought forward of the effect of the height and orientation of the tower block on wind speed around the site; particularly in the Basterfield Access Mews entrance area.
10.7	Amenity: Floodlighting	Sports areas are directly opposite residents windows	Details should be provide of any lighting proposed for the playground and MUGA.	Floodlighting should <u>not</u> be permitted in any scheme for the external sports areas.
10.8	Amenity: Access to Nature:	There is no Access to Nature proposed for the site.	A children's garden (possibly kitchen garden) within the site and mirroring the existing allotment space in Golden Lane Estate would provide a sympathetic connection to the Estate and additional sound and physical buffering of space between the two. This would also provide a way to connect the school to the local community by sharing values and experiences of growing in an urban environment.	Access to Nature to be incorporated into the scheme in accordance with Finsbury Local Plan Policy Site BC34 <i>"The site falls within an area of deficiency in access to nature. Public open space should be provided to offset the loss of playground space and to relieve pressure on Fortune Street Park"</i>
11.1	School Hall	A multi-purpose school hall is proposed for the SW corner of the site. It was suggested that this location helped "Define the boundary" of the site.	The proposed location of the hall also inadvertently "Defines the boundary" of the GLE site and impacts adversely by being sited so close to the listed buildings. Due to its height and bulk it will block strategic long views across the estate which were an important aspect of the original design of the listed estate.	The School Hall should be moved away from the boundary, preferably into the body of the school, with access from Golden Lane itself to facilitate use of the hall.

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11.2	School Hall	There are kitchens proposed for the School Hall	Concern was expressed about the impact of cooking smells and noise from plant in the centre of a residential area. It was noted that the windows to GLE are designed to have permanent ventilation and cannot be completely sealed.	The School Hall should be moved away from the boundary, preferably into the body of the school.
11.3	School Hall	The proposed school hall is to be available for community uses	There is already a community centre on the GLE. There has been disturbance from this use in the evenings.	Proposal to be brought forward for management of the community centre and how disturbance would be managed/Community Use Agreement.
11.4	School Hall	The proposed School Hall is shown as approximately 8.5m high externally on the Sections provided. This is equivalent to 3.5 storeys of Basterfield House.	According to Design Guidance Note from Sport England (February 2012), hall need be no higher than 3.5m internally (4m externally)	Reduce height of School Hall in accordance with Sport England Guidance. To be no higher than 4m externally.
11.5	School Hall	School Hall will be directly in front of windows to habitable rooms in Basterfield House.	In its proposed location the School Hall will block open views and provide an increased sense of enclosure and result in a loss of access to daylight.	School Hall should be re-sited away from residential block. If not then daylighting study to be provided for the windows to habitable rooms in Basterfield House.
11.6	School Hall	Proposed School Hall is located in SW corner of RCS site.	NOTE for reference that public access to the Golden Lane Sport and Fitness is supposed to be via the City Walkway ramp that begins from Fann St, and public access across other parts of the Estate is not supposed to be encouraged.) Additionally, this Access Mews needs to be kept clear for fire tender access. The new residential block could be built partially on top of the Hall (once relocated to the northern edge), and thus reduce the overall building footprint and thus creating additional open space on the site.	Hall could be better located on the north edge of the site. This would reduce disturbance to existing residents of both Hatfield and Basterfield House – both physically in terms of vehicular traffic (service deliveries), and noise (by locating further away from existing residents), and smells (kitchen facilities are too close to these existing residential blocks). Deliveries and access could be achieved either from Baltic St or from Golden Lane, thus removing the need for access along the existing Basterfield Access Mews. (If a new community space is justified then public access to the Hall can also be achieved either from Baltic St or Golden Lane and thus removing the need for public access via the Basterfield service road or into the Golden Lane Estate – which is a private Estate.

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12.1	Acoustics	Playgrounds are sited directly opposite residential block	There was concern noted that there would be considerable disturbance from school drop-off and break times	An acoustic baseline should be established and proposals brought forward to address how noise disruption will be attenuated/reduced
12.2	Acoustics	Rooftop playgrounds proposed. Additional traffic from collection/drop-off	The existing windows to Basterfield House are single glazed and have fixed ventilators that stop them being entirely closed	A section 106 contribution should be made to the cost of double glazing the windows facing the RCS site to reduce the impact of increased noise disturbance.
12.3	Acoustics	Air conditioning Plant is indicated to the roof of the School Hall	Likely to have adverse impact by reason of its proximity to the residential building at Basterfield House	<p>An acoustic report is to be brought forward to include the following information:</p> <ul style="list-style-type: none"> <li>* The proposed operational hours of the plant/activity, plant type, number and locations.</li> <li>* The measured Ambient noise level (L<sub>aeq</sub>) for the 16 hours daytime and 8 hours night time (If plant to operate at night) to assess which planning condition applies.</li> <li>* The representative lowest background noise level assessment (LA<sub>90</sub> 15 minutes) over the proposed hours of operation including the time, date and weather conditions, instrumentation and calibration, noise sampling locations and a copy of the noise survey data, (Graphical &amp; numerical).</li> <li>* Manufacturers Specifications of plant and/or proposed noise levels of internal activity in Octave or 1/3 octave band format.</li> <li>* Calculations for the predicted noise level 1 metre from the window of the nearest sensitive property including distance, directionality and screening effects.</li> <li>* You will need to demonstrate that the predicted noise level outside the most affected window will be 10dB below the lowest background LA<sub>90</sub> (15mins. with correction penalties for tonality or intermittency).</li> <li>* Include any proposed attenuation measures and details of noise reductions achieved.</li> </ul>

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13.1	Overlooking	Rooftop playgrounds are proposed for the school buildings	Concern was expressed about potential overlooking into residential units and noise disturbance. The existing plans for the rooftop do not demonstrate effective buffering and attenuation of the sounds of play. The nearby Golden Lane Campus has a rooftop playground that is surrounded by netting and does not effectively buffer the sounds produced by children at play.	Proposals should be brought forward for landscaping/ screening of any proposed playgrounds at roof level. The plan for this new development should demonstrate a much more effective mechanism for managing sounds of play that emanate from a high point such as a rooftop.
14.1	Construction Management Plan		The residents asked to be consulted formally in the development of a CMP	Proposals to be brought forward for how residents will be consulted in the preparation of any CMP
14.2	Construction Impact	Basterfield Access Mews	Concern was raised about impact on the estate during construction and, in particular, ensuring that site activities are conducted solely within the site and not dependent on use of the Basterfield Access Mews, which is required for emergency vehicles at all times.	Site activities are to be conducted solely within the site and not dependent on use of the Basterfield Access Mews.
15.1	Management	It is understood from a City officer at the consultation on 25 Feb that the new residential block is to be considered an extension of the Golden Lane Estate, and is to be managed by the Golden Lane Estate management team.	Concern was expressed that the new residential block would be “all take and no give”. It contains none of the amenities that make Golden Lane particularly attractive and brings nothing to the table in the way of public amenities.	Details should be brought forward as to how the new residential block will be integrated into the Estate; the effect on existing social and amenity provision should be assessed.

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15.2	Management	New residential block is to be considered an extension of the Golden Lane Estate, and is to be managed by the Golden Lane Estate estate management.	How will this new block affect the division of communal service charges across the Estate? Will this require a change to existing leases to reflect new percentages of allocation?	Further details on the financial impact of the expansion of the Estate on leaseholders and residents was requested.
15.3	Management	Sports Hall Community Use Management	<p>There is concern about the management and use of the Hall, which will affect existing residents of GLE and the new housing element. Management will be in the hands of the School, but will impact primarily on residents.</p> <p>Historic issues have occurred with the management of both the building that COLCEC now operates from (prior to it's conversion into the COLCEC site), and the old Golden Lane Estate Community Association letting of the old Golden Lane Estate Community Centre.</p>	<p>Policy statements and minimum guarantees on the parameters of operation of the Hall should be produced which guarantee how disruption to local residents will be minimised. For instance: guarantees that this is for local community use only and will not be let to commercial organisations; how access and dispersal will be managed; how outside smokers will be managed; what days of the week and hours of operation will be permitted; what noise restrictions will exist; ensuring pro-active monitoring and management of use in light of the above.</p> <p>A draft Lettings Management document should be provided at planning stage.</p>
15.3	Signage	If the new block is to be integrated into the Estate, signage will need to be provided around the Estate	Noted: that some of the signage around the Estate was designed by the original architects; is listed and should not be altered.	Overall plan to be brought forward for the integration of the new block into the Estate, including signage, security, access and amenity.