

Planning Statement

Brunel Walk, Haringey,
London, N155HQ and
Turner Avenue Estate,
Haringey, N155DG

London Borough of Haringey

October 2022

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CONTENTS

1. INTRODUCTION	4
2. THE PROPOSED DEVELOPMENT	5
3. SITE AND SURROUNDING CONTEXT	7
4. HISTORY	9
Planning history	
Pre-application engagement	
Community engagement	
5. PLANNING POLICY AND LEGISLATIVE OVERVIEW	12
Introduction	
Statutory Framework	
National Planning Policy Framework (NPPF) - 2021	
The London Plan 2021	
Local Planning Policy	
6. PLANNING ASSESSMENT	17
Introduction	
Principle of development	
Housing provision	
Residential mix	
Housing tenure	
Quality of accommodation	
Design, townscape and heritage	
Landscaping/trees, public realm, amenity and play space	
Ecology	
Impact on neighbouring amenity	
Transport and parking	
Crime Prevention	
Sustainability and energy	
Refuse and recycling	
Other environmental considerations	
7. CIL AND PLANNING OBLIGATIONS	44
Community Infrastructure Levy (CIL)	
Planning obligations	
8. CONCLUSION	46

1. INTRODUCTION

- 1.1 This Planning Statement is submitted in support of a planning application made by the London Borough of Haringey for the redevelopment of land at Brunel Walk, N15 5HQ and Turner Avenue Estate, N15 5DG, Haringey for residential use and
- 1.2 The description of development is as follows:
- “Redevelopment of Brunel Walk to provide 45 new Council rent homes in four buildings ranging from 3 to 4-storeys high including 39 apartments and 6 maisonettes. Provision of associated amenity and play space, cycle and refuse/recycling stores and 4 wheelchair parking spaces. Reconfiguration and enhancement of existing parking areas and outdoor communal areas and play spaces on the Turner Avenue Estate.”*
- 1.3 All the affordable homes proposed will be for Haringey Council Rent and are therefore considered to be ‘genuinely affordable’ homes.
- 1.3 The proposals forms part of London Borough of Haringey’s response to the GLA’s ambitious ‘Building Council Homes for Londoners Programme’. This will help Londoners who would otherwise struggle to rent or buy, and forms part of Homes for Londoners - the Mayor’s work to tackle London’s housing crisis. The Mayor published his Building Council Homes for Londoners funding prospectus in May 2018. This will help councils to build a new generation of council homes, with the majority of homes based on social rent levels.
- 1.4 In May 2018, the Council committed to delivering a new generation of Council homebuilding and the first step towards this, a thousand new Council homes at Council rents by 2022 – the first in Haringey for more than forty years. This Housing Delivery Programme is about transforming the lives of thousands of Haringey people. It will provide affordable, high quality, sustainable and secure homes of the right size to homeless households, residents with specialist needs and to those on the Housing Register in the most urgent need. For many of those with specialist requirements and in greatest need, a council home also offers the only real chance of putting down roots in Haringey. The Council is to build as many of these new council homes itself, which can include ‘infill’ on existing estates, adding to existing buildings or using council land which until recently was used for other purposes.
- 1.5 All new Council homes built are to be managed by the Asset Team which currently manage the Council’s existing stock.
- 1.6 The site at Brunel Walk and Turner Avenue Estate is in the Council’s ownership and was identified as part of the Council’s Housing Delivery Programme on account of its location, existing use and context. The site is in an accessible and established residential area and comprises a recently cleared area, formally accommodating Council buildings used for temporary accommodation and a post-war Council estate with associated parking and amenity space.
- 1.7 Having regard to the nature of the site, the Council’s corporate priorities and local planning objectives to deliver high-quality sustainable development, it is considered to be most appropriately used for new residential purposes and associated environmental improvements. The current proposals are for the erection of 45 Council homes in four carefully designed buildings with associated parking, refuse/recycling and cycle storage facilities, and amenity space and landscaping. They also entail the reconfiguration and

enhancement of existing parking and outdoor communal areas and play spaces on the Turner Avenue Estate. The application follows detailed pre-application engagement with the London Borough of Haringey and the local community. The resultant scheme is consequently a high-quality design that makes optimal use of the site, contributing to meeting London's and the Borough's housing requirements, and bringing about considerable improvements to the site and the locality generally.

- 1.8 The development proposed complies with local planning policies and in particular makes provision for affordable housing and high-quality amenity spaces and landscaping and is designed to safeguard and improve neighbouring residential amenity. The key objective is to ensure that development sits comfortably on site, provides well-designed dwellings and enhances the appearance and environmental quality of the local area.
- 1.9 The purpose of this Planning Statement is to identify and assess the scheme against relevant planning policy to assist the Council in its determination of the application. This is influenced by a description of the proposals; confirmation of the extent of pre-application engagement and liaison undertaken with key stakeholders and the local community; identifying planning policy at a national, regional and local level relevant to the consideration of the proposals; identifying relevant material considerations; and, providing a conclusion as to why the proposals are acceptable.
- 1.10 This Statement should be read in conjunction with the architectural plans/elevation drawings and the following documents which are submitted as part of this application, which has been agreed with officers through pre-application discussions that have been undertaken to date:
 - Covering letter
 - Application form / CIL forms / Ownership certificate
 - Air Quality Assessment report prepared by Accon Uk Limited
 - Air Quality Neutral Assessment report prepared by Accon Uk Limited
 - Arboricultural Assessment prepared by Hayden's Arboricultural Consultants Limited
 - Daylight and Sunlight Assessment prepared by ROL Consulting
 - Design and Access Statement prepared by KC & Architects
 - Drainage Strategy Report (including SUDS strategy) by Meinhardt (UK) Ltd
 - Ecological Impact Assessment (including Biodiversity Net Gain calculation prepared by EPR Ltd
 - Fire Strategy prepared by Joule Group
 - Flood Risk Assessment by Meinhardt (UK) Ltd
 - Energy and Overheating Assessment (including Lifetime Carbon Assessment) prepared by Meinhardt (UK) Ltd
 - Geotechnical Design Report by A2 Site Investigation
 - Landscape Design and Access Statement (including Urban Greening Factor calculation prepared by Oobe
 - Noise Assessment prepared by Max Fordham
 - Outline Construction Logistics Plan (CLP) prepared by RGP
 - Planning Statement prepared by London Borough of Haringey
 - Statement of Community Involvement (SCI) prepared London Borough of Haringey
 - Sustainability Statement prepared by Meinhardt (UK) Ltd
 - Transport Assessment prepared by RGP
 - Travel Plan prepared by RGP

1.11 The Statement is structured as follows:

- Section 2 - provides detail of the application proposals.
- Section 3 - describes the site and surrounding context.
- Section 4 - details briefly the planning history, pre-application and community engagement processes.
- Section 5 - provides an overview of the key national, regional and local planning policy and guidance and legislation relevant to the assessment of the proposed development.
- Section 6 - provides an assessment of the proposal against the and the key provisions of the Development Plan and other material considerations.
- Section 7 – sets out the CIL and planning obligations requirements.
- Section 8 – briefly concludes on the key merits of the proposed development.

2. THE PROPOSED DEVELOPMENT

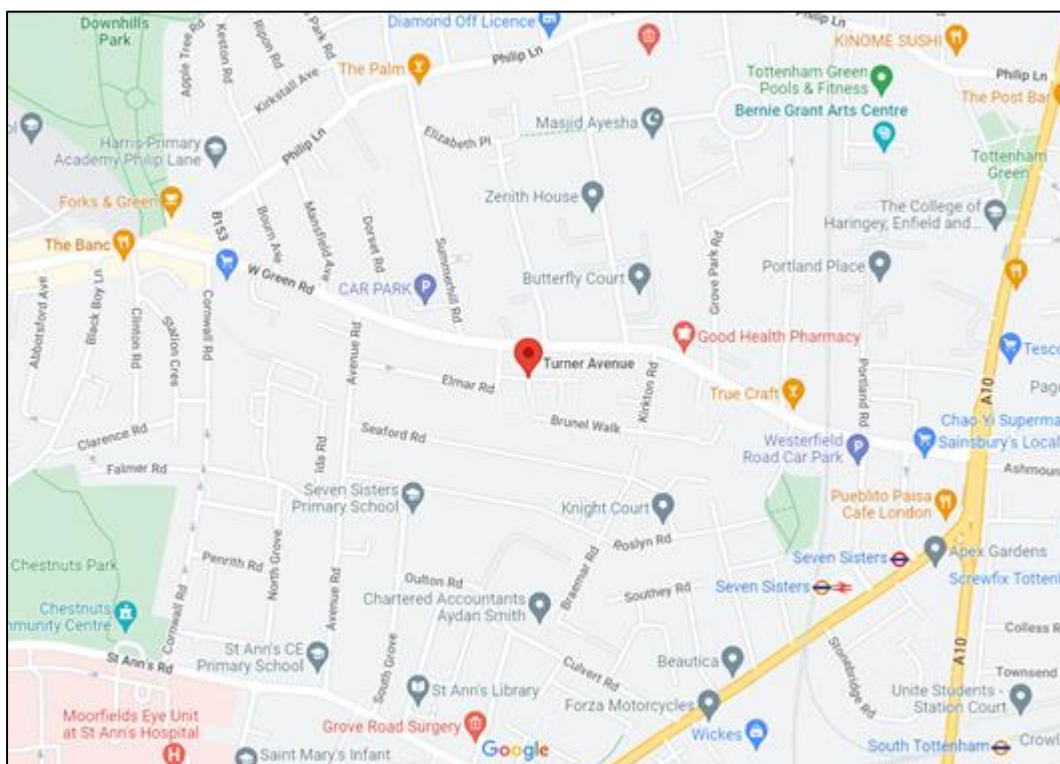
- 2.1 Full planning permission is sought for the re-development of part of site for residential use (Class C3) with associated amenity space, landscaping and parking, and the reconfiguration and enhancement of existing parking and outdoor communal areas and play spaces.
- 2.2 The intended approach, as indicated in the plans submitted is to redevelop Brunel Walk for new affordable accommodation in a manner that respects neighbouring residential amenity and the character and appearance of the surrounding area. In so doing, the proposals have sought to treat the site in a comprehensive way to specifically ensure that the proposed development is integrated into the Turner Avenue Estate and delivers significant site-wide environmental improvements for the benefit of existing residents and the surrounding community.
- 2.3 In detail, the application scheme comprises:
- 39 apartments and 6 maisonettes (incl. 4 wheelchair homes)
 - Refuse/recycling and cycle stores
 - Caretaker facilities
 - Plant room
 - Private gardens, terraces and balconies
 - Improved estate communal space/public realm
 - New and improved estate play areas/facilities
 - New and enhanced hard and soft landscaping including boundary treatment and seating
 - New lighting and CCTV
 - Improved estate parking areas including 4 wheelchair accessible parking spaces
- 2.4 The 45 new homes will be contained within four, three and four-storey buildings aligned along Brunel Walk, with pedestrian access gained from Elmar Road to the west, Turner Avenue, and Kirkton Road to the east. One, two and three-bedroom homes are distributed across the four proposed buildings to provide a variety of accommodation including four wheelchair user homes which are located on the ground floor level of each building.

- 2.5 The proposed homes are at least dual aspect, provide well-designed living spaces, incorporate storage, and feature private gardens, terraces or balconies which comply with the relevant planning policy space standards. Shared landscaped gardens including children's play space are located between the proposed buildings providing additional amenity for the new homes.
- 2.6 Communal cycle stores are located within each building, with cycle storage facilities for the ground floor apartments and the maisonettes located in their private gardens. Space for larger bikes is catered for in these stores in accordance with planning policy guidance. In addition, space is incorporated for pram storage. Appropriate refuse/recycling facilities are also provided including new and relocated refuse/recycling stores for the existing estate.
- 2.7 As part of developing the new homes, a comprehensive landscaping scheme is proposed to ensure that the setting of the new development and the wider site is complementary and attractive, and the environmental quality, security, and amenities of the Turner Avenue Estate are significantly improved for the benefit of existing residents. The proposals will include:
- Provision of green amenity space for the new homes
 - Enhancement of existing communal areas/public realm and green space on existing estate
 - Rationalising of existing parking areas on estate to create a more pedestrian focused environment and additional green space
 - Substantial new planting, including trees to enhance visual and residential amenity, urban greening and biodiversity
 - New and improved children's play spaces/facilities
 - New boundary treatments and secure access points to improve resident privacy, safety and security
 - New pathways and new permeable surfaces including sustainable urban drainage arrangements
 - New refuse/recycling storage facilities for estate
 - New seating areas
 - New lighting and CCTV
- 2.8 The proposed development is planned and designed to respond not only to the form and function of the proposed accommodation but to respect the character and appearance of the surrounding area having regard to its location, constraints, and opportunities. In particular, the scale and form of the proposed buildings reflect the shape of the site, its boundary conditions and the nature of the local built environment, including the Conservation Area and neighbouring residential and visual amenity. The planned scheme varies in height from four to five-storeys to optimise the number of affordable homes, respect the scale of neighbouring property and address the site's prominent corner location.
- 2.9 The proposed development is planned and designed to respond not only to respond to the form and function of the proposed accommodation but to respect the character and appearance of the surrounding area having regard to its location, constraints, and opportunities. In particular, the scale and form of the proposed buildings reflect the shape of the site, its boundary conditions and the nature of the local built environment and neighbouring residential and visual amenity. The new buildings have been carefully sited and vary in height from three to four-storeys to respond to the position and scale of neighbouring property, safeguard adjoining amenity and optimise the number of affordable homes.

- 2.10 In addition to the overall configuration of the development, the architectural style of the proposed buildings has also been carefully considered to respond to the local context and enhance the existing townscape. In particular, their detailed form, architectural approach and materiality have sought to reflect the character of existing properties on both the Turner Avenue Estate and adjoining roads, namely Kirton Road and Elmar Road. The buildings will have an attractive and contemporary appearance using traditional materials including high-quality brick and stonework with contrasting detailing and carefully positioned and proportioned windows and balconies. The placement and design of windows and balconies also specifically seek to avoid direct overlooking of neighbouring property. The simple and balanced articulation of the elevations and considered use of materials seek to complement the proportions of the buildings and provide a distinctive, contextual and robust architectural language.
- 2.11 The proposed development has sought to adopt a progressive approach to sustainability and will deliver a zero-carbon development. The proposed buildings adopt a 'fabric-first' design will have high levels of insulation and incorporate features such as energy efficient heating including individual Air Source Heat Pumps for each dwelling and photovoltaic panels at roof level, that will keep running costs low whilst minimising overheating risks. Appropriate measures have also been included to mitigate against the risk of the new homes overheating.
- 2.12 The new accommodation achieves an overall on-site reduction of 101.2% in regulated carbon dioxide emissions over Part L 2013 of the Building Regulations and it will be constructed with responsibly sourced and environmentally friendly materials. The comprehensive landscaping strategy will enhance local biodiversity and assist with climate change through substantial planting including new trees and sustainable urban drainage. The reconfigured and new parking areas will also be provided with electric charging points.

3. SITE AND SURROUNDING CONTEXT

- 3.1 The site is located at Brunel Walk and the Turner Avenue Estate in the Seven Sisters Ward of the Borough of Haringey. Brunel Walk is a recently cleared area, formally accommodating Council buildings used for temporary accommodation. The Turner Avenue Estate is an established residential Council estate (see site photographs and location maps below).
- 3.2 Brunel Walk was built on part of the former Palace Gates Railway Line, immediately south of the Turner Avenue Estate and backs onto the rear gardens of the terraced houses on Seaford Road. Access to Brunel Walk is from Kirkton Road to its east, at the point where it meets Braemar Road to the south and Lomond Close to the east. The Turner Avenue Estate occupies land between Brunel Walk and West Green Road to the north with main access gained via Turner Avenue.
- 3.3 The properties formerly on Brunel Walk have recently been demolished and comprised 36 mainly one-bedroomed flats in 5 buildings ranging from 1- to 2.5 storeys in height. The Turner Avenue Estate accommodates 4 substantial blocks of flats ranging from 4 to 4.5 storeys set amongst landscaped communal amenity and play space and two parking courtyards.
- 3.4 The wider area is predominantly residential in character accommodating a range of property types and styles including traditional Victorian terraces, and post-war Council and more contemporary predominantly private blocks of flats. It should be noted that the Clyde Circus Conservation Area is located to the north of the site, encompassing parts of West Green Road including the Fountain Hotel and the eastern terrace on the junction of Kirkton Road and West Green Road which are closest to the development site. There are no statutory or locally listed buildings near the site however the northern frontage of West Green Road and the Fountain Hotel are identified as making a positive contribution within the Conservation Area Appraisal.



Location plan of site

- 3.5 Despite its predominantly residential location, there are many services and amenities that can be accessed by the most sustainable transport modes, walking and cycling. West Green Road to the north provides local shops and easy access to buses and leads east to further shops and facilities are located on the High Street half a mile away. Downhills Park is approximately a 12-minute walk away as well as Chestnuts Park, at a similar distance, both are located to the west of the site. Brunswick Road Open Space is under 500m away and is a 6-minute walk from the site.



Aerial photograph of Brunel Walk and Turner Avenue Estate

- 3.6 Seven Sisters Primary School to the south-west is a 7-minute walk from the site. The College of Haringey, Enfield and North East London is located 0.6 miles to the east and Park View Secondary School is less than a mile away to the west of the site. There are a number of leisure and social facilities near the site including, Tottenham Green Pools & Fitness and the Bernie Grant Arts Centre both 0.6 miles away.
- 3.7 The Public Transport Accessibility Level (PTAL) of the site the site falls in to three different categories ranging from 3 in the west to 4 in the centre and 6a in the east. PTAL assesses connectivity (level of access) to the transport network, combining walk time to the public transport network with service wait times. A score of 3 is moderate, 4 good and 6a is excellent and the highest score possible. In practical terms the walking distance between the west and east of the site is not significant when the extent of local amenities and facilities within walking or cycling distance to the site is considered.
- 3.8 The area is well served by bus stops and routes along West Green Road and Seven Sisters Underground and Overground stations are under half a mile away (8-minute walk) from the site. Tottenham Hale Underground and Overground stations are also close by, approximately 1.1 miles to the east and Turnpike Lane Underground station is 1.2 miles to the west. Given these services and high average PTAL scores, the site can be considered to be highly accessible.



Aerial photograph of site (former buildings on Brunel Walk highlighted in red)

4. HISTORY

Planning and development history

- 4.1 The site has been subject to previous development of relevance to the current application. In terms of how the site has changed overtime, its nature and form can be explained by its development history and an understanding of this has assisted in

informing the design process.

- 4.2 Part of the site at Brunel Walk was built c.1970 on part of the former Palace Gates Railway Line. The site has recently been cleared but formerly accommodated five buildings providing Temporary Accommodation. The remainder of the site comprises the Turner Avenue Estate featuring four substantial flatted blocks and associated amenity space and parking centred around Turner Avenue.
- 4.3 Brunel Walk effectively forms a cul-de-sac, linear in nature and flanked by the rear gardens of the traditional Victorian properties on Seaford Road properties to the south and the Turner Avenue Estate to the north. It is not readily overlooked from the Turner Avenue Estate or other neighbouring property and partly as a result, has attracted unusually high levels of anti-social behaviour.
- 4.4 The Council commissioned a property condition and feasibility report in respect to the accommodation at Brunel Walk in 2010 which highlighted the poor condition of the properties, internally and externally, and concluded that the components of the properties had exceeded their life span and had been poorly maintained.
- 4.5 On the basis, the Council considered the option of repairing and converting the existing properties but discounted this in favour of a demolition and newbuild option on grounds that it would be very difficult to bring the existing buildings up to current Decent Homes standards and make the best use of the whole site.
- 4.6 On 3rd August 2022, a Prior Approval application for the demolition of the buildings at Brunel Walk was granted by the Local Planning Authority and the buildings have since been removed. It should also be noted that the buildings on the Turner Avenue Estate are currently undergoing major improvement works as part of the Council's Decent Homes programme.
- 4.7 Alongside the work undertaken exploring and implementing options for change and improvement at Brunel Walk and the Turner Avenue Estate, the site was allocated in the Local Plan in 2017 as an estate renewal opportunity.
- 4.8 Whilst the designation, as defined by Site Allocation SS3 – Brunel Walk and Turner Avenue of the Tottenham Area Action Plan 2017 (TAAP) does not set out a specific strategy, it does highlight a number of possible opportunities for change and improvement across the site with associated development guidelines and parameters.
- 4.9 The proposed scheme at Brunel Walk and the Turner Avenue Estate has been prepared having regard to the history of the site, its current condition, and the local planning policy context.

Pre-application engagement

- 4.10 Formal pre-application engagement has been undertaken with the Local Planning Authority (LPA) at the London Borough of Haringey (LBH). The application has been designed in part to respond to the pre-application advice provided.
- 4.11 At officer level the LPA has been supportive of the proposals subject to detailed design and technical considerations. The steer received from the LPA has in part been informed by the Quality Review Panel (QRP) which considered the emerging proposals on two occasions. The QRP provides impartial and objective advice from a diverse range of experienced practitioners to

assist the LPA in negotiating design improvements where appropriate and, in addition to support decision-making by the Planning Committee, to secure the highest possible quality of development.

- 4.12 In their final report, the QRP summarised its views of a latter iteration of the proposals as follows:

“The panel welcomes the response to its comments at the previous review, largely supporting the improvements made to the scheme, and commenting that the overall relationship between the landscaping and the proposed residential blocks is positive.

The panel also welcomes the ambition of the proposals given such a challenging site, with the scheme having the potential to set a standard for the development of new homes on other council estates in the borough. Further consultation with residents and the local community will be essential in addressing some of the detailed issues informing the proposals, such as the removal / replacement of existing trees, overlooking, and the care and maintenance of the gardens. It will be essential that the security and long-term maintenance of the estate and its landscaping is clearly understood and agreed to, both by residents and the local authority.

The massing and site layout are appropriately addressed overall, with blocks A, B and C working well. Block D, which is in closer proximity to the Victorian terraces on Kirkton Road, would benefit from a more sensitive approach, taking into account the detailing of the historical building stock. The panel also suggests that the proposed flat roof for block D might be revisited, and that its ground floor plan be given further thought as to the location of the entrance relative to the cycle store, refuse area and plant room.”

- 4.7 In relation specifically to how the development responds to its context, the report added:

“The difference between public, semi-public and private space should be clearly legible, with further thought being given to the quality and detailing of fencing / walls to be used across the scheme. For example, the difference between public and private space could be signalled through introduction of simple barriers at key points of entry to the estate.

The overall massing and site layout for blocks A, B and C is welcomed by the panel, with this deemed appropriate given the adjacent 1950s buildings.”

- 4.8 In respect to the architectural approach, the report noted:

“The panel recognises the work done in taking forward the architectural design of the scheme since the last Quality Review Panel and believes that the approach taken to blocks A, B and C is appropriate and in keeping with the existing 1950s estate adjacent to the site.

In terms of proposed materials, the warm, buff brick and horizontal banding, with this reinforced by balconies, is generally supported by the panel.”

- 4.9 The Panel considered the landscaping strategy for the scheme could be an exemplar for similar schemes in the Borough and welcomed the schemes ambition to be net zero in relation to sustainability.
- 4.10 The Panel did highlight however a number of issues it considered should be explored further including:
- Community engagement on the detailed landscaping approach
 - Entrance, elevational detailing and roof form of Block D
 - Boundary treatment
 - Lighting
 - Landscape maintenance
 - Use of shared gardens
 - Tree removal and heat gain

Community and stakeholder engagement

- 4.11 The Applicant has also liaised closely with the Council's Asset Team and the Metropolitan Police Designing Out Crime Team in developing the scheme. The proposals have been subject to extensive community consultation and engagement exercises and Member briefings. These have informed and shaped the proposed development.
- 4.12 Further details of the engagement process are set out in the in the Statement of Community Involvement (SCI) and Design and Access Statement (DAS) that accompanies this submission.

5. PLANNING POLICY AND LEGISLATIVE OVERVIEW

Introduction

- 5.8 This Application has been informed by the adopted and emerging development plan policies and other relevant guidance. This section of the Statement provides a summary of the planning context, and the following sections provide an assessment of the application against the policies and guidance contained within these documents.

Statutory Framework

- 5.9 Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires planning applications to be determined in accordance with policies of the statutory Development Plan unless material considerations indicate otherwise. However, section 11 of the National Planning Policy Framework (2019) states that where the Development Plan is absent, silent or relevant policies are out of date, presumption should be in favour of sustainable development and planning permission should be granted, unless material considerations indicate otherwise.

National Planning Policy Framework (NPPF) - 2021

- 5.10 The revised National Planning Policy Framework (NPPF) was published in July 2021 and supersedes previous iterations. The Framework sets out the Government's approach to planning matters and is a material consideration in the determination of planning applications. This should be considered in conjunction with the National Planning Practice Guidance 2021.

- 5.11 The key objective of the NPPF is to achieve sustainable development which is defined in paragraph 8 as incorporating economic, social and environmental objectives. It states that planning policies and decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area. To ensure that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development (paragraph 11).
- 5.12 The Framework recognises the overwhelming need to accommodate and accelerate housing development and make more effective use of land and gives 'substantial weight' to the value of using suitable brownfield land for new homes. It emphasises that development proposals that accord with an up-to-date development plan should be approved without delay. To support the Government's objective of significantly boosting the supply of homes, the document states that it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.
- 5.13 Paragraph 69 discusses the important contribution that small and medium sites can play and the speed in which they can deliver additional dwellings. Part c) specifically supports the development of windfall sites stating that decisions should give 'great weight to the benefits of suitable sites within existing settlements for homes'.
- 5.14 Paragraph 120 specifically promotes the development of under-utilised land and buildings, 'especially if this would help to meet identified needs for housing where land supply is constrained, and available sites could be used more effectively.'
- 5.15 Paragraph 124 states that planning decisions should support the efficient use of land taking into account the needs for different types of housing, local market conditions, the capacity of local infrastructure and services, the desirability of maintaining an area's character or promoting its change and the importance of good design.
- 5.16 Paragraph 130 states Planning policies and decisions should ensure that developments:
- a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
 - b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
 - c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);
 - d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;
 - e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and

- f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

Development Plan

- 5.17 The Development Plan for the Site comprises:
- The London Plan 2021 - Spatial Development Strategy for Greater London.
 - LBH Local Plan Strategic Policies 2013-2017 March 2013: Consolidated with alterations since 2017.
 - LBH Development Management Development Plan Document (2017) (DMDPD)
 - LBH Tottenham Area Action Plan Development Plan Document (2017) (TAAPDPD)
 - LBH Policies Map (2017).
- 5.18 The adopted development plan is supported by Supplementary Planning Documents (SPDs) and Supplementary Planning Guidance (SPG) at the regional and local level.
- 5.19 The Greater London Authority (GLA) has published a number of supporting documents that are relevant in the consideration of this Application. Of particular relevance are:
- Mayor's Affordable Housing & Viability SPG (2017);
 - Mayor's Housing SPG (2016);
 - Mayor's Sustainable Design and Construction SPD (2014);
 - Mayor's Shaping Neighbourhoods: Character and Context SPG (2014);
 - Mayor's Shaping Neighbourhoods: Play and Informal Recreation SPG (2012);
 - Mayor's London Environment Strategy (2018);
 - Mayor's Planning for Equality and Diversity in London SPG (2007);
 - Mayor's Accessible London: Achieving an Inclusive Environment SPG (2004);
 - Mayor's Energy Strategy and Mayor's Draft Energy Assessment Guidance (2020);
 - Mayor's Carbon Offset Funds Guidance (2018);
 - Mayor's Control of Dust and Emissions during Construction and Demolition SPG (2014); and
 - Mayor's Transport Strategy (2018).
- 5.20 At the local level, LBH has adopted a number of SPDs and Planning Policy Guidance Notes which are a material consideration in respect of the application. The documents of particular relevance in this instance are the following:
- LBH Planning Obligations SPD (2018); and
 - LBH Sustainable Design and Construction (2013).

The London Plan 2021

- 5.21 The Plan is part of the statutory development plan for London, meaning that the policies in the Plan should inform decisions on planning applications across the capital. Borough's Local

Plans must be in 'general conformity' with the London Plan, ensuring that the planning system for London operates in a joined-up way and reflects the overall strategy for how London can develop sustainably, which the London Plan sets out.

5.22 The following London Plan policies are of relevance to this application:

GG1 (Building strong and inclusive communities); **GG2** (Making the best use of land); **GG3** (Creating a healthy city); **GG4** (Delivering the homes Londoners need); **GG6** (Increasing efficiency and resilience); **Policy SD10** (Strategic and local regeneration); **Policy D1** (London's form, character and capacity for growth); **Policy D3** (Optimising site capacity through the design-led approach); **Policy D4** (Delivering good design); **Policy D5** (Inclusive design); **Policy D6** (Housing quality and standards); **Policy D7** (Accessible housing); **Policy D8** (Public realm); **Policy D11** (Safety, security and resilience to emergency); **Policy D12** (Fire safety); **Policy D14** (Noise); **Policy H1** (Increasing housing supply); **Policy H4** (Delivering affordable housing); **Policy H5** (Threshold approach to applications); **Policy H6** (Affordable housing tenure); **Policy H7** (Monitoring of affordable housing); **Policy H10** (Housing size mix); **Policy HC1** (Heritage conservation and growth); **Policy HC3** (Strategic and Local Views) **Policy G1** (Green infrastructure); **Policy G4** (Open space); **Policy G5** (Urban greening); **Policy G6** (Biodiversity and access to nature); **Policy G7** (Trees and woodland); **Policy SI 1** (Improving air quality); **Policy SI 2** (Minimising greenhouse gas emissions); **Policy SI 4** (Managing heat risk); **Policy SI 5** (Water infrastructure); **Policy SI 7** (Reducing waste and supporting the circular economy); **Policy SI 10** (Aggregates); **Policy SI 12** (Flood risk management); **Policy SI 13** (Sustainable drainage); **Policy T1** (Strategic approach to transport); **Policy T2** (Healthy Streets); **Policy T3** (Transport capacity, connectivity and safeguarding); **Policy T4** (Assessing and mitigating transport impacts); **Policy T5** (Cycling); **Policy T6** (Car parking); **Policy T6.1** (Residential parking); **Policy T7** (Deliveries, servicing and construction).

5.23 It is worth noting that Policy H1 of the London Plan which relates to the supply of housing seeks to see a step change in delivery on all suitable sites. Haringey's annual housing target set out in Table 4.1 of the Plan is 1,958 dwellings, which represents a 30% increase from the current target of 1,502 dwellings per annum. The Planning Inspector had found fault with the overall strategy and proposed to cut this to 1,592 dwellings per annum, which still represents an increase on the previous target and shows the need for LB Haringey to find sites to accommodate increased housing growth. The Policy envisages that this step change will come from various sources but in particular areas with existing or planned PTAL 3-6, areas within 800m of a station or town centre boundary, and through small housing development.

5.24 It highlights that delivering more affordable housing is a key strategic issue for London and Policy H4 - Delivering affordable housing, requires the provision of more genuinely affordable housing. The Mayor expects that residential proposals on public land should deliver at least 50 per cent affordable housing on each site.

5.25 The London Plan advises that to accommodate the growth identified in an inclusive and responsible way every new development needs to make the most efficient use of land by optimising site capacity. Policy D3 - Optimising site capacity through the design-led approach, seeks to ensure the form of development is the most appropriate for a site and land uses meet identified needs. It emphasises a design-led approach to optimising site capacity should be based on an evaluation of the site's attributes, its surrounding context

and its capacity for growth to determine the appropriate form of development for that site. Higher density developments should generally be promoted in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling.

- 5.26 The Mayor is committed to London becoming a zero-carbon city. Policy SI 2 - Minimising greenhouse gas emissions requires that Major development should be net zero-carbon. This means reducing greenhouse gas emissions in operation and minimising both annual and peak energy demand in accordance with the following energy hierarchy:

- 1) be lean: use less energy and manage demand during operation.
- 2) be clean: exploit local energy resources (such as secondary heat) and supply energy efficiently and cleanly.
- 3) be green: maximise opportunities for renewable energy by producing, storing and using renewable energy on-site.
- 4) be seen: monitor, verify and report on energy performance.

The Policy highlights that Major development proposals should include a detailed energy strategy to demonstrate how the zero-carbon target will be met within the framework of the energy hierarchy. A minimum on-site reduction of at least 35 per cent beyond Building Regulations is required for major development. Residential development should achieve 10 per cent, and non-residential development should achieve 15 per cent through energy efficiency measures. Where it is clearly demonstrated that the zero-carbon target cannot be fully achieved on-site, any shortfall should be provided, in agreement with the borough, either via a cash in lieu contribution to the borough's carbon off-set fund, or through an alternative off-site provision.

Local Planning Policy

- 5.21 Local development plan policies for the site are contained within documents of the London Borough of Haringey's Local Plan. The main documents are the Strategic Policies Development Management Document (DPD), which sets out the long-term vision of how Haringey should develop by 2026 and the Council's strategy for achieving that vision, and Development Management DPD, which gives effect to the key objectives of Haringey's Strategic Policies by providing a clear framework for development and supporting proposals that contribute to the delivery of sustainable development. Both of documents were adopted in July 2017. Whilst the site is not designated in the Tottenham Area Action Plan Development Plan Document, it sits just within its southern boundary. The Area Action Plan has been prepared in order to ensure that the scale of development and change proposed for Tottenham through 2026 and beyond is positively managed and guided by a planning framework. It also ensures that investment decisions meet the aspirations of the local community and the Council for the area, as well as specific places and locations within it.
- 5.22 The following Local Plan policies are of relevance to this application:
- *Strategic Policies DPD: SP0* (Presumption in favour of sustainable development); **SP1** (Managing growth); **SP2** (Housing); **SP4** (Working towards a Low Carbon Haringey); **SP5** (Water Management and Flooding); **SP6** (Waste and recycling); **SP7** (Transport); **SP8** (Employment); **SP9** (Improving skills and training to support access to jobs and community cohesion and inclusion); **SP11** (Design); **SP12** (Conservation); **SP13** (Open space and biodiversity); **SP14** (Health and well-being); **SP16** (Community

Facilities).

- *Development Management DPD: Policy DM1* (Delivering high quality design); **Policy DM2** (Accessible and safe environments); **Policy DM3** (Public realm); **Policy DM4** (Provision and design of waste management facilities); **Policy DM6** (Building heights); **Policy DM9** (Management of the Historic Environment); **Policy DM10** (Housing supply); **Policy DM11** (Housing mix); **Policy DM12** (Housing design and quality); **Policy DM13** (Affordable housing); **Policy DM19** (Nature Conservation); **Policy DM20** (Open space and green grid); **Policy DM21** (Sustainable design layout and construction); **Policy DM22** (Decentralised energy); **Policy DM23** (Environmental protection); **Policy DM24** (Managing and reducing flood risk); **Policy DM25** (Sustainable drainage systems); **Policy DM26** (Critical Drainage Areas); **Policy DM27** (Protecting and improving groundwater quality and quantity); **Policy DM28** (Protecting and enhancing watercourses and flood defences); **Policy DM29** (On-site management of waste water and water supply); **Policy DM31** (Sustainable transport); **Policy DM32** (Parking); **Policy DM33** (Crossovers, vehicular access and adopting roads); **Policy DM37** (Maximising the Use of Employment Land and Floorspace); **DM40** (Non-Designated Employment Land and Floorspace); **Policy DM48** (Use of planning obligations); **Policy DM49** (Managing the provision and quality of community infrastructure).
- *Tottenham Area Action Plan: Policy AAP3* (Housing); **Policy AAP4** (Employment); **AAP5** (Conservation and Heritage); **AAP6** (Urban Design and Character including Tall Buildings); **AAP7** Transport; **AAP9** (Tottenham's Green Grid); **AAP10** (Meanwhile Uses); **AAP11** (Infrastructure).

- 5.23 The Council have started a Local Plan review process. The published Local Development Scheme indicates that the New Local Plan was to be adopted in February 2022. However, this programme is out of date. As it stands, the Council have yet to publish a version of the New Local Plan and it therefore does not carry any weight at this stage.

6. PLANNING ASSESSMENT

Introduction

- 6.8 This section provides an overview of main considerations in respect of the proposed development. It assesses the scheme against key adopted planning policy for the following elements:
- Principle of development
 - Residential mix
 - Housing tenure
 - Quality of accommodation
 - Design, townscape and heritage
 - Landscaping/trees, public realm, amenity and play space
 - Ecology
 - Impact on neighbouring amenity
 - Transport and parking
 - Crime prevention
 - Sustainability and energy
 - Refuse and recycling
 - Other environmental considerations:

- Air quality
- Noise
- Flooding and drainage
- Ground conditions and contamination

Principle of development

Policy context

- 6.9 Paragraph 69 of the NPPF notes that small and medium size sites can make an important contribution to meeting the housing requirement of an area and are often built out relatively quickly.
- 6.10 The NPPF advocates policy that seeks to significantly boost the supply of housing and also requires local planning authorities to ensure their Local Plan meets the full, objectively assessed housing needs for market and affordable housing. There is a specific requirement for local planning authorities to maintain a supply of deliverable sites sufficient to provide five years' worth of housing against their housing requirements with an additional buffer of 5% to ensure choice and competition in the market.
- 6.11 Policy H1 - Increasing housing supply in the London Plan, encourages Boroughs to meet their 10-year housing targets by optimising the potential for housing delivery on all suitable and available brownfield sites through their Development Plans and planning decisions, especially in respect to sites with existing or planned PTALs of 3-6 or which are located within 800m of a station or town centre boundary.
- 6.12 Policy G1 - Green infrastructure part A in the London Plan, states that London's network of green and open spaces, and green features in the built environment, should be protected and enhanced. Green infrastructure should be planned, designed and managed in an integrated way to achieve multiple benefits. Part D of the policy goes on to say that development proposals should incorporate appropriate elements of green infrastructure that are integrated into London's wider green infrastructure network.
- 6.13 Policy SP2 - Housing in the Council's Strategic Policies DPD, revises the Borough's housing target to a minimum target per annum from 820 to 1,502 for the period 2015-2026.
- 6.14 Haringey's Local Plan Policy SP16 – Community Facilities states that the Council will work with its partners to ensure the much-needed infrastructure and community facilities and services are provided for local communities. Existing facilities will be protected and where possible, enhanced. This will be based on the projects identified in the Council's Infrastructure Delivery Plan (IDP).
- 6.15 Policy DM10 - Housing Supply of the Council's Development Management DPD, seeks to increase housing supply and seeks to optimise housing capacity on individual sites.
- 6.16 Policy DM49 - Managing the provision and quality of community infrastructure states that the Council will consider supporting the consolidation of equal or enhanced provision of community facilities to meet an identified need. It highlights that proposals for new and extended social and community facilities and the sharing of facilities will be supported by the Council provided they are accessible by sustainable means of transport; are located within the community that they are intended to serve; provide flexible, multifunctional and adaptable space; safeguard highway safety and residential amenity.

- 6.17 Site Allocation SS3 – Brunel Walk and Turner Avenue, highlights the site as a potential masterplanned housing estate renewal opportunity to improve the quality and utility of the housing stock. It states that the Council will work with existing residents to bring forward a masterplanned development which improves the quality and mix of housing on this site to better meet local need. It does not expect additional housing numbers on-site. The site allocation sets out the following requirements and guidelines:

Site Requirements

- Development will be required to be in accordance with a masterplan, prepared with resident involvement.
- Existing buildings do not need to be retained, although refurbishment of the existing blocks with limited infill of the Turner Avenue part of the site should be considered.
- Design should take into account and positively respond to the Clyde Circus Conservation Area adjacent to the site.
- The use on this site will be residential.
- A new public open space should be provided on this site. The potential for this to link with the outside drinking area to the rear of the Fountain Pub should be considered.
- National Grid cables are identified as being present on site and need to be identified and built around to ensure appropriate access for contractors to maintain.

Development Guidelines

- Developments along West Green Road should be consistent with those of the neighbouring properties on West Green Road.
- Heights could increase towards the centre of the site, but would need to be reduced to the south, east and west to respect the amenity of neighbouring residential buildings.
- Due to the good, and improving, public transport connections, parking should be limited on this site. The parking needs of existing residents should be accessed through future site masterplanning.
- Improved site permeability to enhance connection to the local road network. A through route may be acceptable if sensitively integrated and designed to restrict through traffic, including traffic calming measures.
- This site lies in a groundwater Source Protection Zone and as such the Council will expect developments to demonstrate no adverse impact on water quality.
- This site is identified as being in an area with potential for being part of a Decentralised Energy (DE) network. Development proposals should be designed for connection to a DE network, and seek to prioritise/secure connection to existing or planned future DE networks, in line with Policy DM22.
- The southern portion of the site is in a Critical Drainage Area, and any development proposals should refer to the Local Flood Risk Management Strategy.

- 6.18 In summary, the Mayor of London and the Borough are keen to bring forward development which delivers high-quality affordable housing, optimise the use of previously developed land and maximises the benefits to the local community including the provision of good quality open space.

Assessment

- 6.19 The site is designated as a Site Allocation in the Tottenham Area Action Plan which identifies it as a potential masterplanned housing estate renewal opportunity to improve the quality and utility of the housing stock. The site also lies within Flood Zone 1 (which is an area with a low probability of flooding) and sits within a Critical Drainage Area.
- 6.20 As noted previously, the site at Brunel Walk and Turner Avenue is located in an established and accessible residential area, typical of many urban neighbourhoods in London and comprises recently cleared housing land and a Council estate with associated amenity space and car parking. It forms one of a number of development opportunities the Council has identified as part of its Housing Delivery Programme which seeks to use public owned land more effectively to build new council homes to meet local need.
- 6.21 Brunel Walk and the adjoining estate represent Brownfield Land (land currently or formerly developed) in an urban setting. Part of the site at Brunel Walk was previously occupied by building used for Temporary Accommodation, which was unfit for purpose, disconnected from the Turner Avenue Estate and attracted significant levels of anti-social behaviour. Whilst the existing blocks on the estate are currently undergoing major works as part of the Council's Decent Homes Programme, the adjoining communal areas and landscaping are in poor condition, unattractive and similarly attract significant levels of anti-social activity. The proposals presented in this application are based on two key planning objectives. First, to make more effective use of the vacant land at Brunel Walk for new, sustainable, and affordable housing to meet local need and second, to integrate the development and the Turner Avenue Estate and deliver comprehensive site-wide landscaping improvements for the benefit of new and existing residents.
- 6.22 Paragraph 121 of the NPPF states that local planning authorities should take a positive approach to applications for alternative uses of land which are currently developed but not allocated for a specific purpose in plans, where this would help to meet identified development needs. The principle of residential use is therefore considered acceptable having regard to the current use and location of the site.
- 6.23 The site has good access to public transport and is close to a wide range of amenities including retail functions, community facilities and parks and open spaces, as described above. According to London Plan Policy H1 referenced above, this type of brownfield location is a key source of housing capacity.
- 6.24 The redevelopment of this site for additional homes will contribute to the Borough's housing target for the period from 2015-2026 in accordance with Strategic Policy 2. This also aligns with the thrust of the London Plan which identifies a pressing need for more homes including affordable homes.
- 6.25 In accordance with Site Allocation policy designation – SS3, the proposed development and associated changes have been based on a master-planned approach, informed by a comprehensive analysis of the constraints and opportunities presented by the site and the nature of its immediate environs and the wider urban context. The plan is designed to optimise the delivery high-quality Council rented homes and external spaces and to enhance the local environment having regard to neighbouring residential amenity and the character and appearance of the surrounding area. Whilst the proposals would result in a net increase of nine dwellings previously on-site, this small addition is considered reasonable having regard to the carefully planned approach and positive in seeking to address local housing need.

- 6.26 Having regard to the additional number and type of new homes and associated amenities, and the range of existing community services and facilities in the surrounding area, it is not considered that any new community related provision is required on-site to cater for the scheme and potential demands arising. It should be noted that local community groups have made informal use of a former caretaker's room within the Temporary Accommodation for meetings and the storage of gardening tools and have expressed concern about the need for replacement space. In response, the Housing Department has confirmed that it will assist in finding possible alternative meeting accommodation. It has also agreed that it will provide replacement garden storage facilities nearby for 6 months with a view to securing space on-site after this period.
- 6.27 The pre-application advice received from the Local Planning Authority confirms the principle of new residential development is acceptable subject to all other material considerations.
- 6.28 In summary, the proposals seek to redevelop a brownfield site, close to sustainable transport connections in an established residential area and the principle of further residential use in this location is supported by national, regional and local policy, which identify housing as a strategic need. The provision of 45 genuine affordable homes will make an important contribution towards meeting Haringey's housing target and will assist in meeting much needed local housing need. The scheme will also deliver significant improvements to the environmental quality of the site to enhance both the setting of the new development and the quality, functionality, safety, and attractiveness of the surrounding area for existing and new residents.

Residential mix

Policy context

- 6.29 London Plan Policy H10 - Housing size mix, states that schemes should generally consist of a range of unit sizes. To determine the appropriate mix of unit sizes in relation to the number of bedrooms for a scheme, it advises that applicants and decision-makers should have regard to a range of factors including robust evidence of local need; the requirement to deliver mixed and inclusive neighbourhoods; the nature and location of the site, with a higher proportion of one and two bed units generally more appropriate in locations which are closer to a town centre or station or with higher public transport access and connectivity and; the aim to optimise housing potential on sites.
- 6.30 While Strategic Housing Market Assessments cover the full range of needs between 2016 and 2041, the London Plan states that boroughs may wish to prioritise meeting the most urgent needs earlier in the Plan period, which may mean prioritising low-cost rented units of particular sizes.
- 6.31 For low-cost rent, Policy H10 advises that boroughs should provide guidance on the size of units required (by number of bedrooms) to ensure affordable housing meets identified needs. This guidance should take account of: 1) evidence of local housing needs, including the local housing register and the numbers and types of overcrowded and under-occupying households 2) other criteria set out in Part A, including the strategic and local requirement for affordable family accommodation 3) the impact of welfare reform 4) the cost of delivering larger units and the availability of grant.
- 6.32 Policy SP2 – Housing, of the Strategic Policies DPD, states that high quality new residential development in Haringey will be provided by ensuring that new development provides a

range dwelling types and sizes to meet local housing requirements.

- 6.33 Policy DM11 – Housing mix, of the Development Management DPD requires new residential development, including mixed-use schemes, to provide a mix of housing giving regard to individual site circumstances, the need to optimise housing output and the need to achieve mixed and balanced communities. In particular, it requires residential mix to have regard to site circumstances, character of surrounds, constraints and scale of development.
- 6.34 Policy DM11 also outlines that the Council will apply the London Plan policies on residential density in accordance with Policy SP2 but expects the optimum housing potential of a site to be determined through a rigorous design-led approach.
- 6.35 As indicated above, Site Allocation SS3, states that the Council will work with existing residents to bring forward a masterplanned development which improves the quality and mix of housing on this site to better meet local need. The Allocation does not expect additional housing numbers on-site and highlights that existing buildings do not need to be retained, although refurbishment of the existing blocks with limited infill of the Turner Avenue part of the site should be considered.

Assessment

- 6.36 The proposed development will provide 45 new affordable dwellings comprising a range of sizes to meet local housing need as follows:
- 8 x 1 bed, 2-person flats (18%)
 - 16 x 2 bed 4-person flats incl. 4 wheelchair adapted homes (36%)
 - 15 x 3, 5-person bed flats (33%)
 - 6 x 3 bed, 5-person maisonettes (13%)
- 6.37 The type of accommodation has been informed by a detailed design process and viability exercise to ensure a planning compliant and deliverable scheme.
- 6.38 The development was challenging to plan by virtue of the shape and constrained nature of the site, its proximity of neighbouring property and the key aim of seeking to ensure it is fully integrated into the adjoining estate. The layout and form of the proposed development, however, takes full account of these factors to optimise the accommodation mix and space available for the provision of high-quality housing, particularly family sized dwellings. The layout of the development is efficiently planned to deliver 1-, 2- and 3-bedroom apartments and maisonettes including wheelchair adapted homes and associated private and communal amenity space.
- 6.39 The proposed development forms part of the Council's Housing Delivery Programme which seeks to optimise the provision of affordable accommodation for Council rent to meet local need. The Programme is part funded by the GLA and is informed by the Local Plan and the Council's corporate Housing Strategy. It aims to address the Council's housing waiting list and specialist housing through the provision of a wide range of housing typologies across all the sites identified, manage issues relating to the over and under occupation of the existing housing stock and ensure the effective use of public assets and funding.
- 6.40 The proposed accommodation is informed by a design-led approach which has secured an appropriate number of homes on-site. The layout and scale of the proposed development and the nature of accommodation are delivered in direct response to a considered design

solution having regard to the constraints and opportunities presented by the site, local planning policy and housing need.

Housing tenure

Policy context

- 6.41 The London Plan highlights that delivering more affordable housing is a key strategic issue for London and London Plan Policy H4 - Delivering affordable housing, requires the provision of more genuinely affordable housing. The Mayor expects that residential proposals on public land should deliver at least 50 per cent affordable housing on each site.
- 6.42 Local Plan policy SP2 - Housing, states that the Council will aim to provide homes to meet Haringey's housing needs and to make the full use of Haringey's capacity for housing by maximising the supply of additional housing to meet and exceed the minimum target including securing the provision of affordable housing.
- 6.43 Policy DM13 - Affordable housing, in Haringey's Development Management DPD states that the Council will seek the maximum reasonable amount of affordable housing provision when negotiating on individual private residential and mixed-use schemes with site capacity to accommodate more than 10 dwellings.

Assessment

- 6.44 The proposed development provides accommodation for Council rent and forms part of the Council's Housing Delivery Programme which seeks to deliver new affordable housing across the Borough as referred to earlier. The Programme is part funded by the HRA and the GLA and aims to address the Council's housing waiting list and specialist housing need through the provision of a wide range of housing typologies across all the sites identified, manage issues relating to the over and under occupation of the existing housing stock and ensure the effective use of public assets and funding.
- 6.45 The 45 proposed Council rented homes will make an important contribution to the provision of genuinely affordable homes within the Borough. It should also be noted that the site is located within an established residential area accommodating a significant range of tenures including private rent, owner-occupied and Council.

Quality of accommodation

Policy context

- 6.46 The Nationally Described Space Standards set out the minimum space requirements for new housing.
- 6.47 London Plan Policy D6 – Housing Quality and standards, states that housing development should be of high-quality design and provide adequately-sized rooms and storage space with comfortable and functional layouts which are fit for purpose and meet the needs of residents without differentiating between tenures. It emphasises that qualitative aspects of a development are key to ensuring successful sustainable housing and that housing development should maximise the provision of dual aspect dwellings and normally avoid the provision of single aspect dwellings. It requires that the design of development should

provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context, whilst avoiding overheating, minimising overshadowing, and maximising the usability of outside amenity space.

- 6.48 The Mayor of London's Housing SPG seeks to ensure that the layout and design of residential and mixed-use development should ensure a coherent, legible, inclusive, and secure environment is achieved.
- 6.49 Haringey Policy DM12 – Housing design and quality, of the Development Management DPD seeks all new housing and residential extensions to be of high quality, considering the privacy and amenity of neighbouring uses and requires the minimum national space and London Plan standards to be met.

Assessment

- 6.50 The proposed development has been designed having regard to local planning policy and guidance and complies with the standards set out in the national and London Plan space standards and the Council's own Housing Employer Requirements. The development secures the following standards and amenities:
- All dwellings achieve or exceed minimum space standards set by policy including external amenity space.
 - All dwellings achieve compliance or part compliance with Building Regulations M4 (1), M4 (2) and 10% of units achieve M4 (3) compliance.
 - All dwellings are at least dual aspect.
 - All dwellings including external space receive good levels of sunlight/daylight.
 - All dwellings have a minimum floor to ceiling height of 2.5m.
 - All dwellings are well laid out to provide useable living spaces to meet modern living arrangements.
 - Sufficient space for storage is provided in each dwelling in accordance with policy.
 - The development is designed to be sustainable with the proposed accommodation providing high levels of insulation, efficient means of heating and cooling, adequate levels of sunlight/daylight and ventilation and noise mitigation.
 - Sufficient space is provided for cycle parking and refuse/recycling storage in accordance with policy.
 - The development will achieve Secure By Design accreditation.
 - New and enhanced communal amenity areas including car parking courts, play-space, high-quality landscaping, lighting, seating and appropriate planting to increase urban greening and biodiversity.
 - New and replacement semi-mature trees will be planted across the site and within the neighbouring estate.
 - Car parking provision is made for four wheelchair accessible spaces on-site.
- 6.51 The position of the proposed homes has been carefully considered in relation to boundary conditions, outlook, privacy, light, and orientation to maximise the quality of the accommodation.
- 6.52 The Design and Access Statement accompanying the planning application sets out the approach taken to the design of the accommodation and related amenities and demonstrates these standards and benefits are delivered.

Design, townscape and heritage

Policy context

- 6.53 The NPPF states that the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. It goes on to say that being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities and other interests throughout the process.
- 6.54 The London Plan emphasises the importance of good design process and scrutiny. Policy D4 - Delivering good design, states that the design of development proposals should be thoroughly scrutinised by borough planning, urban design, and conservation officers. In addition, boroughs and applicants should make use of the design review process to assess and inform design options early in the planning process.
- 6.55 For residential development the London Plan states that it is particularly important to scrutinise the qualitative aspects of the development design described in Policy D6 - Housing quality and standards. The higher the density of a development the greater this scrutiny should be of the proposed built form, massing, site layout, external spaces, internal design and ongoing management. It goes on to say that this is important because these elements of the development come under more pressure as the density increases. The housing minimum space standards set out in Policy D6 help ensure that as densities increase, quality of internal residential units is maintained.
- 6.56 Paragraph 3.6.1 of the London Plan states that 'For London to accommodate growth in an inclusive and responsible way every new development needs to make the most efficient use of land. This will mean developing at densities above those of the surrounding area on most sites. The design of the development must optimise housing density. A design-led approach to optimising density should be based on an evaluation of the site's attributes, its surrounding context and capacity for growth and the most appropriate development form, which are determined by following the process set out in Policy D2 - Delivering good design. Policy H1 - Increasing housing supply, Policy H2 - Small sites and Policy H3 - Monitoring housing targets set out requirements for increasing housing supply across London.'
- 6.57 The Mayor of London's Housing SPG seeks to ensure that the layout and design of residential and mixed-use development provides a coherent, legible, inclusive and secure environment is achieved. It advises that, through scale, material, massing and building type, development should take account of the existing character and urban grain of a place and build on its positive elements.
- 6.58 Policy SP11 – Design, of the Councils' Strategic Policies DPD states that all new development should enhance and enrich Haringey's built environment and create places and buildings that are high quality, attractive, sustainable, safe and easy to use. To achieve this the Policy states that all development shall:
- Ensure impacts on health, climate change, natural resources and biodiversity are minimised by adopting and improving sustainable design and construction techniques;
 - Incorporate solutions to reduce crime and the fear of crime, such as promoting social inclusion; creating well-connected and high-quality public realm that is easy

and safe to use; and by applying the principles set out in 'Secured by Design' and Safer Places;

- Promote high quality landscaping on and off site, including improvements to existing streets and public spaces;
- Seek the highest standards of access in all buildings and places; and
- Ensure buildings are designed to be flexible and adaptable – and able to integrate services and functions.

- 6.59 Policy SP12 – Conservation, of the Council's Strategic Policies DPD requires new development to conserve the historic significance of Haringey's heritage assets and their settings.
- 6.60 Policy DM1 – Delivering high quality design, of the Development Management DPD states that all new development and changes of use must achieve a high standard of design and contribute to the distinctive character and amenity of the local area.
- 6.61 Policy DM6 – Building Heights, expects all development proposals to include heights of an appropriate scale, responding positively to local context and achieving a high standard of design in accordance with Policy DM1. For buildings projecting above the prevailing height of the surrounding area it will be necessary to justify them in urban design terms, meeting prescribed design requirements.
- 6.62 Policy DM9 - Management of the Historic Environment, states that development should sustain and enhance the significance of heritage assets.

Assessment

- 6.63 From the beginning of the development design process, the scheme has been led by these overarching policy design principles, to reflect the Council's design objectives for the redevelopment of the site. The design of the proposals has evolved as a result of an iterative design process and engagement with the Council, local stakeholders and the community. The proposals have been informed by a contextual analysis of the area and were considered and developed through pre-application engagement with the Local Planning Authority. The Design and Access Statement accompanying the planning application sets out the approach taken and the rationale behind the design of the proposed scheme.
- 6.64 The design of the proposed development seeks to optimise the potential of the site to deliver high-quality affordable accommodation, and comprehensively enhance the external environment and amenities of the Turner Avenue Estate having regard to neighbouring residential amenity and the character and appearance of the surrounding area. The approach has been based on a detailed analysis of the constraints and opportunities presented by the site and the nature of its immediate environs and the wider urban context.
- 6.65 In particular, the application site and the surrounding area is residential in character accommodating a wide range of property types and styles including two-storey traditional housing and large multi-storey flatted development. The Clyde Circus Conservation Area is located to the north of the site, encompassing parts of West Green Road including the Fountain Hotel and the eastern terrace on the junction of Kirkton Road and West Green Road which are closest to the development site. There are no statutory or locally listed buildings near the site however the northern frontage of West Green Road and the Fountain Hotel are identified as making a positive contribution within the Conservation Area Appraisal.

- 6.66 The land identified for redevelopment currently comprises a cleared site formerly accommodating housing in temporary use and communal space forming part of the adjoining Turner Avenue Estate. It is accessed via a narrow road from Kirton Road which leads into a footpath towards its western end providing a link to Elmar Road. This link however been blocked for some time. A concrete wall and wire mesh fencing divide Brunel Walk from the Turner Avenue Estate. The temporary accommodation at Brunel Walk was in poor condition, no longer fit for purpose and subject to significant levels of anti-social behaviour and the reason for the footpath being blocked.
- 6.67 The Turner Avenue Estate itself is accessed from West Green Road and Turner Avenue and comprises a series of four-storey post-war blocks of flats and associated amenity and parking areas. Whilst the existing blocks are currently undergoing major works as part of the Council's Decent Homes Programme, the adjoining communal areas including amenity and play spaces and parking courts are in poor condition and unattractive and the estate similarly attracts significant levels of anti-social and criminal activity. The Council consider it reasonable therefore under these circumstances to make more effective use of the land at Brunel Walk for new, sustainable, and affordable accommodation and tying this into the Turner Avenue Estate with a comprehensive site-wide landscaping strategy to improve the amenities and local environment for the benefit of new and existing residents and the wider community.
- 6.68 In exploring the redevelopment and improvement opportunities presented by the site, The Applicant has considered a range of options to optimise the number and type of affordable housing in this location to ensure local need is catered for appropriately and existing amenities are enhanced. The preferred scheme, as proposed in this application will provide for a range of high-quality homes and external amenity space, in addition to significantly improving the environmental quality and amenity of the Turner Avenue Estate through a comprehensive landscaping strategy.
- 6.69 The development has been carefully sited and designed to fit into its challenging context and to safeguard and enhance neighbouring residential amenity. In particular, the scale and form of the proposed buildings reflect the shape of the site, its boundary conditions and the nature of the local built environment including the Conservation Area and neighbouring residential and visual amenity. The new buildings vary in height from three to four-storeys to respond to the position and scale of neighbouring property, protect adjoining amenity and respect the limited views to and from the Conservation Area.
- 6.70 In particular, the proposed buildings have been positioned and designed to avoid neighbouring property being directly overlooked and overshadowed and thereby protect existing levels of privacy and light enjoyed by adjoining residents. A sunlight/daylight assessment has been carried out and is submitted with the planning application, which demonstrates adjoining property within and bordering the site will not be adversely affected by the proposed development in this regard. In addition, comprehensive noise and air quality assessments have been undertaken which highlight that the proposed development will not adversely impact living conditions in the local area.
- 6.71 As described earlier, the site lies within an established residential location accommodating a wide range of property types and styles including traditional Victorian terraced housing and multi-storey blocks of flats. The proposed buildings will have an attractive and contemporary appearance using traditional materials including high-quality brick and stonework and contrasting detailing and carefully positioned and proportioned windows and balconies. Their detailed design has sought to reflect the architectural character of the surrounding area and incorporate a number of period features prevalent on existing property. The simple and balanced articulation of the elevations and considered use of materials complement the

proportions of the buildings and provide a distinctive, contextual, and robust architectural language.

- 6.72 The proposed development will assist in creating a noticeable improved sense of place and enhancing the appearance, function and legibility of the area. It will deliver a high-quality residential environment for the benefit of existing and future residents.
- 6.73 Given the benefits of the scheme, and the informed approach to height, massing, detailed design, and landscaping, it is considered that the proposals accord with the key objectives of the London Plan and Local Plan.

Landscaping/trees, public realm, amenity and play space

Policy context

- 6.74 In respect to existing landscaping on the site, this comprises the now vacant and hardscaped surface and boundary planting of Brunel Walk and the external communal spaces and public realm forming part of adjoining Turner Avenue Estate including parking, amenity and play areas.
- 6.75 Whilst the existing site is not considered to present a high-quality urban environment, it provides an opportunity as part of a new residential development to significantly enhance the character and appearance of the area for the benefit of existing and future residents.
- 6.76 London Plan Policy G4 - Open space, aims to “promote the creation of new areas of publicly-accessible open space” as well as “enhance open spaces to provide a wider range of benefits for Londoners”. Policy G5 - Urban greening, sets out that major development proposals need to contribute to the greening of London by including urban greening as a fundamental element of site and building design. Boroughs should develop an Urban Greening Factor (UGF) with a target score in the interim of 0.4 for predominantly residential developments.
- 6.77 London Plan Policy G6 - Biodiversity and access to nature, aims to manage impacts on biodiversity and aim to secure biodiversity net gain.
- 6.78 London Plan Policy S4 - Play and informal recreation, outlines the need to provide new play facilities as part of development proposals. It also states that at least 10m² of play space per child should be provided that: a) provides a stimulating environment; b) can be accessed safely from the street by children and young people independently; c) forms an integral part of the surrounding neighbourhood; d) incorporates trees and/or other forms of greenery; e) is overlooked to enable passive surveillance, and; f) is not segregated by tenure.
- 6.79 Haringey’s Local Plan Policy SP11: Design, aims to promote high quality landscaping on and off-site including improvements to existing streets and public spaces”.
- 6.80 Policy SP13: Open Space and Biodiversity, provides policy on the following: protecting and improving open space; providing opportunities for biodiversity and nature conservation (including green and brown roofs, green walls and bird and bat nesting/roosting opportunities); and protection of existing trees and the planting of new trees where appropriate and the provision of informal and formal play space to meet the minimum of 3m² per child, with the aspirational target of 10m² per child (as set out in the Mayor’s SPG

Providing for Children's and Young People's Play and Informal Recreation).

- 6.81 Policy DM1 - Delivering High Quality Design of the Development Management DPD, requires proposals to demonstrate how landscape and planting are integrated into the development expects development proposals to respond to trees on or close to a site, whilst Policy DM21 of the expects proposals to maximise opportunities to enhance biodiversity on-site, including through appropriate landscaping, Sustainable Drainage Systems, living roofs and green walls.

Assessment

- 6.82 The application proposes the redevelopment of a vacant site, formerly occupied by buildings in use for Temporary Accommodation, and landscaping improvements to the Turner Avenue Estate. Having regard to the nature of the existing site, the proposed development together with a high-quality landscaping treatment, will significantly improve the quality, useability, security, and appearance of the site and contribute to the visual and residential amenity of the immediate area.
- 6.83 The proposals present an opportunity to integrate Brunel Walk into the Turner Avenue Estate and comprehensively enhance the environmental quality and amenity of the site. An extensive hard and soft landscaping strategy has been prepared to ensure that the setting of the new development and the wider site is attractive and complementary, and the environmental quality, security and amenities of the Estate are significantly improved for the benefit of existing residents. As highlighted previously in this report, the landscaping proposals will create new and enhance existing open spaces and play areas, incorporate substantial new planting including new and replacement trees, improve the layout of the existing parking courtyards, surface treatment and footpaths and provide new shared refuse/recycling and cycle storage facilities.
- 6.84 The proposed development enables the communal areas and public realm across the site to be better defined and access in and around the site to be rationalised. Natural surveillance will also be significantly improved, new boundary treatments/enclosures provided with access points secured for use by residents only, and new lighting and CCTV installed to reduce opportunities for anti-social and criminal behaviour.
- 6.85 The landscaping strategy as set out in detail in the Landscaping Design and Access Statement (DAS), prepared by Oobe and accompanying this submission, is based a number of 'character areas' to ensure new and enhanced provision responds appropriately to the location, nature and function of the different spaces across the site. The character areas identified are:
- West Green Road
 - Parking areas
 - Communal amenity space
 - Garden space
 - Braemar/Kirkton Road public realm
- 6.86 In summary, the hard and soft landscaping proposals will include:
- Provision of private gardens/terraces and green communal amenity space

for the new homes

- Enhancement of existing communal areas/public realm and green space on existing estate
- Rationalising of existing parking areas on estate to create a more pedestrian focused environment and additional green space
- Substantial new planting, including trees to enhance visual and residential amenity, urban greening and biodiversity
- New and improved children's play spaces/facilities
- New boundary treatments and secure access points to improve resident privacy, safety and security
- New pathways and new permeable surfaces including sustainable urban drainage arrangements
- New refuse/recycling storage facilities for estate
- New seating areas
- New lighting and CCTV

- 6.87 In relation to sustainable urban drainage arrangements to manage surface water run-off and enhance biodiversity, a combination of substantial new planting, green roofs, rain gardens and rainwater attenuation tanks is proposed to slow the flow of water into the public surface water drainage network. These measures will attenuate discharge rates to as close to Greenfield runoff rates as reasonably practicable. The assessment undertaken shows a betterment to the existing 1 in 100-year peak discharge rates of 98%. Further details can be found in the Drainage Strategy (including SUDS strategy) prepared by Meinhardt (UK) Ltd and Landscape DAS prepared by Oobe.
- 6.88 Two underground attenuation tanks are proposed, in two of the shared gardens between the proposed buildings. The tanks are set sufficiently deep below ground to allow the area above to be fully landscaped and for tree pits. Benefits of these systems include ecological enhancements and improved water quality. In addition, this attenuation could help reduce surface water flooding understood to take place on the existing car park area on Braemar Road.
- 6.89 The proposals have been developed to retain high quality trees and replace any trees proposed for removal with new tree planting on the site.
- 6.90 A tree survey undertaken as part of preparing the scheme identified 48 individual trees and 9 groups of trees. We understand however that 4 trees and one group have been removed since. A total of 86 trees which exist on site are now made up of 44 individual trees plus 8 groups of trees (comprising 42 trees)
- 6.91 For health and safety, cultural or quality of life reasons 4 trees are to be recommended to be removed irrespective of the scheme. As part of the proposed development 12 individual and 1 group of trees (comprising 5 trees) are to be removed. Of these 17 trees there are 3 category C trees. Trees classed as category B are of moderate quality and estimated to have a remaining life of 20 years. These trees are on the southern boundary and will be replaced by additional tree planting. The remaining trees are of low-quality category C or U category which are in such poor condition that they could not realistically be retained for more than 10 years.
- 6.92 A total of 65 trees will be retained on site made up of 28 individual trees and 7 groups (which comprise 37 trees) and a total of 68 additional new semi-mature trees

are proposed as part of the scheme. There will be a net increase of 47 trees on the site.

- 6.93 For further details in respect to the proposed tree strategy, please refer to the Arboricultural Impact Assessment prepared by Hayden's Arboricultural Consultants Limited.
- 6.94 The London Plan sets out policies to see that new development will result in an increase in green cover across the city. Urban greening is embedded as a fundamental element of the proposed development. Native shrub and perennial planting and trees are proposed to improve the site's biodiversity and to contribute to the quantum of local green space. In addition to planting, green roofs and permeable surfaces capture rainwater and contribute to the development's sustainable drainage design and mitigation of storm water flooding. An assessment of the Urban Greening Factor (UGF) has been undertaken, based on the surface cover types and areas within the application boundary. The proposal has an Urban Greening Factor of 0.65, exceeding the minimum target score of 0.4.
- 6.95 For further details of the UGF please refer to the Landscape DAS prepared by Oobe.
- 6.96 The proposed development introduces a range of affordable housing into the area including family sized homes. It is important that there are sufficient areas of play to cater for the associated increase in children. The provision of children's play space has been considered carefully as part of the layout for the site which seeks to balance the delivery of a wide range of accommodation and new and enhanced local amenities for the benefit of existing and new residents.
- 6.97 A child yield for the proposed development has been prepared, based on the mix and tenure of units. Using the latest GLA Population Yield Calculator, there is a requirement of 473.9 sqm for the proposed accommodation. As the existing play space on the Turner Avenue Estate is dilapidated and underused and there are facilities for children over 12 in Brunswick Road Open Space within 500m of the site, the proposals provide a total of 551sqm, divided into 0-4-year-olds, 5-11 and 0-12+ age group spaces.
- 6.98 The play areas are in locations with good passive surveillance and the spaces for the younger age groups sit within private communal gardens.
- 6.99 In addition to Brunswick Park Open Space, it should be noted that the site is well served by other open spaces with associated play, recreational and sports facilities. Downhills Park for instance, is approximately a 12-minute walk away as well as Chestnuts Park, at a similar distance, to the west of the site. Further details of the play strategy can be found in the Landscape DAS prepared by Oobe.
- 6.100 The proposed development presents a comprehensive landscaping scheme to ensure the setting of the new and existing homes on-site are attractive, green, and safe and complements and enhances the character and appearance of the surrounding area. New substantial planting including trees, attractive permeable surfacing, boundary enclosures, seating and lighting will feature as part of the treatment of the entire site. The proposals seek to provide an exemplar external environment, within and on the perimeter of the development providing for high-quality amenity space, enhanced biodiversity and an attractive streetscape.

- 6.101 Full details of the landscape strategy accompanying the planning application can be found in the Landscape DAS prepared by Oobe. The Council will further engage with residents on the landscaping proposals should the planning application receive consent to ensure that they fully reflect their needs.

Ecology

Policy Context

- 6.102 At a national level, the NPPF states that the planning system should contribute to and enhance the natural and local environment (Paragraph 170-175).
- 6.103 London Plan Policy G6 relates to biodiversity and access to nature. Part D seeks to ensure that development proposals manage impacts on biodiversity and aim to secure net biodiversity gain. This should be 'informed by the best available ecological information and addressed from the start of the development process'. London Plan Policy G5 requires major developments to contribute to urban greening.

Assessment

- 6.104 An ecological impact assessment has been carried out by EPR Ltd. following their initial ecological survey which concluded that the main feature relating to the site was bat assemblage at a local level. It concludes that the proposals will have no significant residual effect and recommends a sensitive lighting strategy to avoid negative effects on bat foraging and commuting behaviour.
- 6.105 The landscape proposals include extensive green roof, new hedgerows, shrubs, grass land, and new trees. An assessment of the biodiversity net gain (BNG) of the proposals has been carried out. BNG is defined as "development that leaves biodiversity in a better state than before. The calculation has indicated that the proposals will deliver a biodiversity net gain of 23.3%, significantly higher than the 10% requirement referenced in the Environment Act 2021.
- 6.106 In addition, bird and bat boxes and bee bricks on new buildings. Hedgehog houses will also be installed within the gardens.
- 6.107 For Full details of the ecological condition of the site and proposed mitigation please refer to the Ecological Impact Assessment (including Biodiversity Net Gain calculation prepared by EPR Ltd.

Impact on neighbouring amenity

Policy context

- 6.108 The proposed development has been carefully designed having regard not only to the living conditions associated with the new accommodation but critically in relation to neighbouring residential amenity, and specifically in respect to safeguarding the outlook, privacy and sunlight/daylight enjoyed by residents of adjoining property.
- 6.109 The NPPF states that good design is a key aspect of sustainable development indivisible from good planning and should contribute positively to making places better for people. The London Plan emphasises the importance of a robust design process to secure high-quality and responsive development.

- 6.110 The Mayor's Housing SPG, indicates that BRE guidelines on assessing daylight and sunlight should be applied sensitively to higher density development in London, particularly in central and urban settings, recognising the London Plan's strategic approach to optimise housing output and the need to accommodate additional housing supply in locations with good accessibility suitable for higher density development. Quantitative standards on daylight and sunlight should not be applied rigidly within built up urban areas, without carefully considering the location and context and standards experienced in broadly comparable housing typologies in London.
- 6.111 Policy DM1 - Delivering High Quality Design, of the Development Management DPD outlines that development proposals must ensure a high standard of privacy and amenity for the development users and neighbours. The Council will support proposals that:
- a. Provide appropriate sunlight, daylight and open aspects (including private amenity space where required) to all parts of the development and adjacent buildings and land;
 - b. Provide an appropriate amount of privacy to their residents and neighbouring properties to avoid overlooking and loss of privacy detrimental to the amenity of neighbouring residents and the residents of the development; and
 - c. Address issues of vibration, noise, fumes, odour, light pollution and microclimatic conditions likely to arise from the use and activities of the development.
- 6.112 Supporting paragraph 2.10 of the Development Management DPD, states that the design and layout of buildings must enable sufficient sunlight and daylight to penetrate into and between buildings and ensure that adjoining land or properties are protected from unacceptable overshadowing.
- 6.113 Policy DM12 – Housing Design and Quality, requires new housing to take account of the privacy of neighbouring uses.

Assessment

- 6.114 The proposed development has sought to make more effective use of a brownfield site in an established and accessible location through a comprehensive approach to deliver much needed affordable housing. In so doing it has not only carefully considered the character and appearance of the surrounding area, but it has also critically taken local residential amenity. The position and scale of the proposed development in relation to neighbouring buildings ensures that the outlook, privacy, and level of sunlight/daylight enjoyed by existing residents will not be adversely affected.
- 6.115 A sunlight/daylight assessment has been carried out and is submitted with the planning application which demonstrates adjoining property bounding the site will not be unduly affected by the proposed development in this regard.
- 6.116 The assessment is based on the various numerical tests laid down in the Building Research Establishment (BRE) guide 'Site Layout Planning for Daylight and Sunlight: a guide to good practice.
- 6.117 The aim of the assessment is to consider the impact of the development on the light receivable by the neighbouring residential properties at Elmar Road, Turner Avenue, Seaford Road, Morland Place and Kirkton Road. The assessment looks at daylight to

windows and overshadowing to gardens and open spaces.

- 6.118 The majority of the windows and amenity areas tested meet or surpass the BRE numerical recommendations. Whilst some do not meet the recommendations, the results are not unusual in the context of this type of urban location. The BRE guide explains that the numerical guidelines should be interpreted flexibly, since natural lighting is only one of many factors in site layout design.
- 6.119 The assessment concludes that the proposed development is consistent with the local, national and regional planning policy, which seeks to ensure the efficient use of land whilst ensuring that acceptable living standards will be maintained.
- 6.120 For the full assessment please refer to the Daylight and Sunlight Report by Right of Light Consulting accompanying this application.
- 6.121 In relation to outlook and privacy, the proposed buildings have also been carefully positioned and designed to avoid adversely affecting neighbouring amenity in these respects. The development is set away the adjoining boundary with properties on Seaford Road to the rear and present significant gaps to allow views through to the Turner Avenue Estate. The buildings are also placed and orientated appropriately to minimise their presence and impact on the existing blocks on the estate.
- 6.122 Balconies are carefully positioned and face east and west and incorporate privacy screens to avoid direct overlooking of neighbouring property. Angled bay windows to habitable rooms have been introduced on the rear elevations of the proposed buildings, again to prevent direct overlooking. In addition, new and replacement trees will be planted along the rear boundary to provide some screening and further mitigate the impact on neighbours.
- 6.123 The surrounding area accommodates a range of property types and styles including traditional terraced housing and multi-storey post-war Council residential blocks. As previously highlighted, the proposed buildings have been intentionally designed to have an attractive and contemporary appearance using traditional materials including high-quality brick and stonework and contrasting detailing, and carefully positioned and proportioned windows and balconies. The simple and balanced articulation of the elevations seek to complement the proportions of the buildings and provide a distinctive and robust architectural language to respect and enhance neighbouring visual amenity.

Crime prevention

Policy Context

- 6.124 London Plan Policy D3 - Optimising site capacity through the design-led approach, states that development proposal should achieve safe, secure and inclusive environments.
- 6.125 Policy SP11 – Design, of the Strategic Policies DPD, requires all development to incorporate solutions to reduce crime and the fear of crime by promoting social inclusion, creating well-connected and high-quality public realm that is easy and safe to use and apply ‘Secured by Design’ and Safer Places principles.
- 6.126 Policy DM2 – Accessible and safe environments, of the Development Management DPD,

seeks to ensure that new developments have regard to the principles set out in 'Secured by Design'.

Assessment

- 6.127 The submitted Design and Access Statement prepared by KC&A Architects provides information on the way the proposed development seeks to enhance security through the layout and design of the buildings and treatment of the external spaces. This has been a particularly important objective given the nature of the existing site and associated issues in respect to safety and security. Part of the site is vacant at Brunel Walk and the communal areas on the Turner Avenue Estate aren't attractive, well-used, nor overlooked and access points aren't secure. Consequently, the site feels unwelcoming, unusable and does not offer the amenities and attracts antisocial and criminal behaviour.
- 6.128 The proposed masterplan for the site been influenced by 'Secure by Design' principles and in doing so seeks to design out the opportunities for antisocial behaviour and crime. It seeks to integrate the new development with the existing estate, eliminate short cut access routes through the site, increase natural surveillance, provide CCTV and improve lighting and the use and management of existing and proposed private and communal/amenity space.
- 6.129 The Metropolitan Police Designing Out Crime Officer has provided advice in designing the scheme appropriately having regard to safety and security. Pedestrian routes have been design ensuring that they are visually open, direct, well used and well lit. The site layout creates new lines of enclosure with building frontage and boundary fences on Elmar Road and Kirkton Road. Within the estate the proposed new buildings form a building line to the south of new courtyards. The public realm is separated from private shared gardens and additional passive surveillance created over the adjacent streets and Turner Avenue. In this way short cut routes over fences and into Brunel walk from Turner Avenue to Kirkton Road will be prevented.
- 6.130 Defensible space has been located to create a clear boundary between public and private space. The planting will allow a clear line of sight to the pavement and open spaces. Clear physical barriers have been integrated into the design to separate private shared gardens and other spaces to discourage access to specific areas with different degrees of privacy.
- 6.131 The proposed dwellings have been orientated to create better surveillance opportunities and amenity areas withing the Turner Avenue Estate have been re-provided in overlooked and well-lit spaces in order to discourage crime and anti-social behaviour. Main access doors are visible from the public realm for good surveillance, well-lit and away from any potential hiding places. The buildings will have a visitor door entry system and an access control system. Communal mail delivery facility will be located within the building entrance and built following the criteria of the Secured by Design guide.
- 6.132 External lighting will be provided throughout the estate and to all the elevations containing a door set and a CCTV camera system is proposed to improve security and deter crime it is shown indicatively.
- 6.133 The scheme is designed to achieve a SBD Gold accreditation subject to additional detail provided at the technical stage.

Sustainability and energy

Policy Context

- 6.134 The proposed development is located within an accessible and established residential area. It also adopts a progressive approach in relation to sustainability and energy to ensure that the most viable and effective solution is delivered to reduce carbon emissions.
- 6.135 The NPPF establishes a presumption in favour of sustainable development. It requires development to contribute to the transition to a low carbon future, reduce energy consumption and contribute to and conserve the natural environment.
- 6.136 London Plan Policy SI 2 - Minimising greenhouse gas emissions, states that major developments should be zero carbon, and in meeting the zero-carbon target a minimum on-site reduction of at least 35 per cent beyond Building Regulations is expected. London Plan the Policy SI 7 “Reducing Waste and Supporting Circular Economy” has been developed to ensure new developments consider the impacts of materials, waste, and works to be carried out, in the form of a Circular Economy Statement.
- 6.137 Local Plan Policy SP4 - Working towards a Low Carbon Haringey, of the Strategic Policies DPD requires all new developments to introduce measures that reduce energy use and carbon emissions. Residential development is required to achieve a reduction in CO2 emissions. Policy SP11 - Design, requires all development to adopt sustainable design and construction techniques to minimise impacts on climate change and natural resources.
- 6.138 Policy DM1 - Delivering High Quality Design, of the Development Management DPD states that the Council will support design-led proposals that incorporate sustainable design and construction principles. Policy DM21 - Sustainable Design, Layout and Construction, expects new development to consider and implement sustainable design, layout and construction techniques. Proposals should minimise energy use, limit the potential for overheating and therefore, reliance on mechanical air conditioning systems, where possible use building materials with high environmental performance ratings and seek locally sourced labour.

Assessment

- 6.139 In addition to the sustainable location of the site, careful consideration has been given to sustainable design principles throughout the evolution of the proposed development. The proposed building is designed to minimise its environmental impact through a variety of means and make the fullest contribution to minimising carbon dioxide emissions in line with the prescribed energy hierarchy.
- 6.140 The scheme achieves a total regulated carbon emissions saving of 101.2% against a Part L 2013 compliant scheme with SAP10.2 carbon factors. The development employs an efficient building fabric based on Passivhaus design principles, including well insulated walls and highly efficient glazing and incorporates air source heat pumps and PV Panels to maximise carbon savings.
- 6.141 Taking this design approach, the proposals have been developed in order to optimise the orientation, glazing proportion and distribution and the form factor of each of the buildings to minimise heat loss and maximise passive heat gain.

- 6.142 The form of the buildings had been simplified to have less surface area for the same floor space and so reduce heat loss. The size, orientation and position of the windows proposed balances the need to maximise natural daylight within rooms and take advantage of beneficial solar heating in the winter against the need to minimize the potential for overheating in the summer.
- 6.143 Window areas as a percentage of wall area compare favourably with those recommended ranging from 13-14% north, 11-21% east (building D faces east) 11-18% west and 20- 27% south. The suggested ranges are of 10-20% north, 10-15% east, 10-15% west and 20- 25% south.
- 6.144 In addition, the U values and air tightness specified for the building envelope have been maximised within the constraints of the development. The building construction will be detailed to provide continuity of insulation in order to prevent heat loss through cold bridging. All these factors have been carefully balanced and optimised within the particular constraints relevant to this site.
- 6.145 To supplement the fabric first approach, energy from space heating will be recycled using efficient mechanical ventilation with heat recovery (MVHR) and waste-water heat recovery systems within each apartment.
- 6.146 The energy demand reductions (Be Lean) from the fabric first approach delivers a carbon dioxide saving of 22.5% which exceeds the target of 10% saving set out in the London Plan.
- 6.147 In reviewing clean and green energy strategies options for low carbon technologies have been explored. The option of providing connection any potential future district heating network has been thoroughly investigated. Further details of this investigation are contained in the Sustainability Statement prepared by Meinhardt (UK) Ltd. Unfortunately, inclusion of a centralised system and the infrastructure required to connect to a potential future district heating network is not viable for this small to medium sized housing scheme.
- 6.148 Green energy strategies have been considered to provide options for low carbon technologies. Efficient Mechanical Ventilation with Heat Recovery is proposed to complement the fabric first proposals and duct lengths to external walls have been minimised. Options such as ground source heat pumps were assessed against the energy demands of the scheme and viability. Air-to-water and water-to-water heat pumps are proposed in an ambient loop system to meet the schemes hot water and space heating demands. Communal air source heart pumps provide an ambient communal water loop provides the benefit of a communal system whilst minimizing heat losses. These will be supplemented with Photo Voltaic panels as a more effective use of roof space than solar hot water.
- 6.149 It is expected that residential apartments will be provided with an individual programmable, zoned, control system, together with smart energy meters. This will allow the display of energy use within individual units, assisting occupants to understand the way in which they consume energy and how much it costs and encouraging them to turn off non-essential equipment or run some equipment at a lower capacity during times of peak demand.
- 6.150 The heat pumps and PVs (Be Green) are expected to provide a further 78.7% improvement over Part L 2013 following the passive design/energy efficiency measures.

- 6.151 Overall, these green technologies will help contribute to an overall on-site reduction of 101.2% in regulated carbon dioxide emissions over Part L 2013 and thereby delivering a zero-carbon development.
- 6.152 The Council recognises that overheating in residential accommodation is of concern in modern highly insulated and airtight buildings and the importance of undertaking such studies to address overheating. To assess the likelihood of overheating risk within the proposed development, an Overheating Assessment has been undertaken to minimise the risk of overheating within the new accommodation and to reduce reliance on artificial cooling.
- 6.153 The proposed development has been designed to allow access to good levels of daylight and sunlight within homes, natural ventilation and security. The design proposals follow the cooling hierarchy and use passive design measures to reduce potential overheating.
- 6.154 The amount of heat entering the building has been reduced using balconies and external louvres to provide shading, careful sizing and orientation of the windows. The specification of the 'g-value' of the windows which is a measure of how much solar heat (infrared radiation) is allowed in through has also been carefully optimized. In addition, high levels of insulation and air tightness, and the provision of green roofs at all levels also help to reduce energy absorbed by the roof.
- 6.155 Internal heat generation will be minimised through specification of energy efficient lighting and minimising heating pipe runs and insulating all heating and hot water equipment. There are no boilers within the apartments and the heating network is low temperature. All appliances will be energy efficient.
- 6.156 Heat within the building will be managed through use of the exposed internal thermal mass of concrete staircases and 2.5m high ceilings. Passive ventilation is enabled through the design of the apartment layouts and positioning of windows. Secure ventilation louvres are provided to the ground floor apartments so that ventilation at night is possible.
- 6.157 Mechanical ventilation is provided which can make use of free cooling when outside temperature is below inside in summer months. It has been possible to avoid the need for active cooling systems.
- 6.158 Results from the overheating modelling indicate that the scheme is compliant with the overheating requirements as set out in Building Regulations Part O using the current Design Summer Year weather file 2020 DSY1 and 2003 DSY 2. DSY 1 is for a moderately warm summer and DSY2 is a more extreme summer with a short intense spell defined by CIBSE. For the other extreme weather scenarios, 1976 DSY3, a summer with a longer less intense warm spell a large proportion of the rooms meet the criteria. Where there are failures, they tend to be in bedrooms during sleeping hours where there are more than 32 hours annually with a temperature of over 26 degrees.
- 6.159 The assessment has been made taking into account the acoustic comfort of the occupants in accordance with the Building Regulations Part O. The site is in an urban setting but not particularly noisy and is suitable for residential occupancy. However, the assessment has been made on the basis that windows are only opened partially to limit disturbance from noise. There is therefore a balance that has been struck in the

assessment between thermal and acoustic comfort and in extreme weather conditions individual occupants will be able to strike their own balance.

- 6.160 Full details of the approach taken in respect to energy and overheating can be found in the Energy and Overheating Assessment prepared by Meinhardt (UK) Ltd. Accompanying this submission.
- 6.161 A Whole Life Carbon Assessment (WLCA) has been carried out to demonstrate the embodied and operational carbon emissions for the proposed development. The aim of this assessment is to model the whole life carbon impact of the proposed design in accordance with RICS Guidance and GLA Sustainability Guidance, using SAP and OneClick LCA software.
- 6.162 The assessment has considered embodied and regulated operational energy use of the proposed development, commencing from a “cleared flat site” in accordance with RICS guidelines. The overall results show that the Proposed Development will have an emission of 3,824,739 tonnes CO₂e.
- 6.163 The results of the assessment have been compared to the WLC benchmarks specified in the GLA guidance for apartments as this is deemed the most suitable building type to be used for comparison. The results show that the carbon emissions associated with modules A1-A5 and modules B-C are below the WLC benchmark specified in the GLA guidance.
- 6.164 Further details are contained in the Sustainability Statement prepared by Meinhardt (UK) Ltd. Accompanying the application.
- 6.165 Overall, the proposed development has been designed to be in line with the policies set out in the London Plan and the London Borough of Haringey Local Plan in respect to sustainability and energy performance.

Transport, access and parking

Policy context

- 6.166 The proposed development seeks to deliver new supported affordable housing in an accessible and established residential area. The scheme is car-free except for the provision of two on-site wheelchair accessible parking spaces. The proposals also will incorporate sustainable travel planning measures including secure cycle storage facilities and car-club and sharing arrangements.
- 6.167 The NPPF highlights at paragraph 110 that in assessing applications for development, appropriate opportunities to promote sustainable transport modes can be taken up given the type of development and its location; safe and suitable access to the site should be achieved for all users and that any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.
- 6.168 Paragraph 111 states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

- 6.169 London Plan Policy T1 - Strategic approach to transport, sets out the Mayor's strategic target for 80 per cent of all trips in London to be made by foot, cycle or public transport by 2041. This policy also promotes development that makes the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport.
- 6.170 Policy DM31 – Sustainable transport, of the Development Management DPD, requires development with high trip generations to be located where public transport accessibility is high and car parking is minimised. The Council will also require the submission of a Travel Plan and a Transport Assessment/Statement in support of development proposals in accordance with the Transport for London thresholds.
- 6.171 Policy DM32 – Parking, of the Development Management DPD relates to parking and states that development proposals will be assessed against parking standards (both car and cycling) in the London Plan. The use of car club schemes as an alternative to on-site car parking is encouraged and proposals for development with limited or no on-site parking will be supported subject to meeting the following:
- There are alternative and accessible means of transport available;
 - Public transport accessibility is at least 4 as defined in the Public Transport Accessibility Index;
 - A Controlled Parking Zone (CPZ) exists or will be provided prior to the occupation of the development;
 - Parking is provided for disabled people; and
 - Parking is designated for occupiers of developments specified as car capped.
- 6.172 Policy DM33 – Crossovers, vehicular access and adopting roads, sets out the requirements for new vehicular access to be supported. It states that any proposal should not result in: a reduction in pedestrian or highway safety; a reduction of on-street parking capacity within a CPZ; or, a visual intrusion to the street scene.

Assessment

- 6.173 The Public Transport Accessibility Level (PTAL) of the site falls into three different categories ranging from 3 in the west to 4 in the centre and 6a in the east. PTAL assesses connectivity (level of access) to the transport network, combining walk time to the public transport network with service wait times. A score of 3 is moderate, 4 good and 6a is excellent and the highest score possible. The site is located within easy reach of public transport services and a wide range of local amenities including shops, community facilities and parks and open spaces. The site also benefits from an established pedestrian and cycle network, allowing site users adopt the most sustainable forms of travel.
- 6.174 A Transport Assessment and an Outline Travel Plan have been prepared in support of the application. The Transport Assessment sets out the impacts of the proposed development in respect to the access, highway and parking implications of the development and mitigating circumstances/measures.
- 6.175 The Local Plan highlights that residential developments in PTAL 4 areas or higher should be car-free. The proposed development is located within a part PTAL-5 and 3 area and will provide three wheelchair accessible on-site parking spaces.
- 6.176 Cycle parking arrangements for the proposed development are in accordance with planning

policy requirements. Communal cycle stores are located within each block, with cycle stores for ground floor apartments and the maisonettes located in their private gardens. Space for larger bikes is provided within these stores on accordance with London Plan guidance and in addition space is also provided for pram storage.

- 6.177 External Sheffield type cycle stands are provided, 5 within the estate and 2 on Kirkton Road. In addition to the secure cycle storage provided for the proposed new dwellings it is proposed to provide two 'Bike-hanger' type cycle stores on Turner Avenue for use by the existing estate residents.
- 6.134 The proposed new homes would operate as a car-free development, owing to the site's generally high PTAL rating in accordance with local planning policy and as there are significant opportunities for journeys to be undertaken via active or sustainable modes of transport, owing to the site's good access to local facilities on foot and by cycle as highlighted earlier. Residents of the new housing will be restricted from applying for parking permits in the surrounding Controlled Parking Zone (CPZ).
- 6.135 Within the Turner Avenue Estate, the layout of the existing parking areas that currently provide 29 parking spaces will be rationalised, and the parking integrated into pedestrian priority areas. All existing 29 spaces will be re-provided including 3 wheelchair accessible spaces to meet existing and future demand.
- 6.136 The Transport Assessment concludes that although the net increase in dwellings from 36, as formerly accommodated at Brunel Walk to 45 would generate additional trips, the majority of these would comprise public transport users or walking trips, owing to the car-free nature of the proposals and the accessible location of the site, which would be comfortably accommodated by the existing public transport network.
- 6.137 A parking survey has also been undertaken as part of the application and indicates that there is on-street parking capacity locally. The surveys assessed the parking capacity of the local road network within circa 200 metres of the site and indicated overall parking stress levels of 70% during both overnight periods with at least 126 legitimate parking spaces being available in the vicinity of the site overnight. The survey found that the Turner Avenue Estate car parks to the north of the site were heavily utilised with all legitimate parking spaces being occupied overnight.
- 6.138 A Travel Plan forms part of the planning submission and residents will be encouraged to travel by more sustainable means having regard to the site's accessible location. Residents will also be able to take up 'free' car-club membership.
- 6.139 In terms of emergency fire access, this will be gained from the Turner Avenue, Elmar Road and Kirkton Road, as existing with the provision of dry riser inlets. It is proposed that all the new dwellings will have an automatic water fire suppression system (sprinklers) along with automatic fire detection systems due to the constraints and nature of the site as a back-land location. A detailed fire strategy report has been prepared by Joule Group and accompanies the application demonstrating
- 6.140 For full details of the transport, access, parking impacts please see the Transport Assessment and Travel Plan prepared by RGP.
- 6.141 The development proposals are considered to comply with the relevant transport and planning policy at national, regional and local levels. The site is located in a sustainable location both in terms of access to social infrastructure and public transport facilities, ensuring residents can adopt sustainable modes of travel to access essential services

- 6.142 Since the proposed development will not have a significant impact on the highway network and will not lead to any unacceptable safety risks, the development is considered to present a highly sustainable solution to residential travel arrangements.

Refuse and recycling

Policy Context

- 6.143 Policy D6 - Housing quality and standards, of the London Plan requires suitable waste and recycling storage facilities in all new developments.
- 6.144 Policy SP6 – Waste and recycling, of the Strategic Policies DPD requires well designed recycling facilities to be integrated into all new developments.
- 6.145 Policy DM4 – Provision and design of waste management facilities, of the Development Management DPD requires all proposals to make on-site provision for general waste and separate recycling provision. Consideration should also be given to the sustainable management of waste during design, construction and occupation of development.
- 6.146 Further guidance of waste and refuse is set out in Haringey's Sustainable Design SPD and its Waste Management Services guidance note.

Assessment

- 6.147 The waste storage arrangements are set out in the Design and Access Statement and Transport Assessment submitted with the application.
- 6.148 Provision will be made for residents to separate their refuse and recycling receptacles within each unit, with food waste also stored separately.
- 6.149 A secure refuse store will be incorporated within one of the proposed new buildings (Building A) and serviced off Elmar Road and new communal refuse/recycling stores will be provided for the remaining new buildings and the Turner Avenue Estate as part of the landscape strategy. All refuse/recycling storage facilities are conveniently located near the main entrance of each new and existing buildings with secure access from the communal courtyard for residents and the
- 6.150 Collection requirements by the local authority's refuse collection team have been carefully reviewed to ensure compliance in relation to vehicle routes, tracking, and bin carrying/dragging distances.
- 6.151 The waste storage and collection arrangements accordingly meet with the relevant local planning policy requirements and guidance.

Other environmental considerations

- 6.152 At all policy levels there is a requirement to prevent unacceptable harm to amenity arising from new development. Paragraph 185 of the NPPF states Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to

impacts that could arise from the development.

6.153 This section briefly reviews the following environmental issues in relation to the proposed development:

- Air Quality
- Noise
- Flood Risk and drainage
- Ground Conditions and Contamination

Air quality

6.150 The Council seeks to improve air quality across the borough. Local Plan Policy DM23 - Environmental Protection, of the Development Management DPD requires all development to consider air quality and improve or mitigate the impact on air quality in the borough and users of the development.

6.151 A detailed Air Quality Assessment and Air Quality Neutral Assessment have been carried which consider the impacts arising from the construction and operation of the proposed development.

6.152 Based on the assessments, it is considered that the site is suitable for residential use and that the proposed development would not expose existing residents or future occupants to unacceptable air quality. As the development will be car-free, there is not anticipated to be a significant increase in vehicle movements as a result of the development and heating and power will come from ASHP and WSHP which produce no emissions. Similarly, the air quality impacts from the proposed development during its construction phase would not be significant and that in air quality terms it would not conflict with national or local planning policies.

6.153 For more information refer to the Air Quality Assessment and Air Quality Neutral Assessment reports prepared by Accon, accompanying this application.

Noise

6.154 The NPPF states, in paragraph 185, that new development should mitigate and reduce to minimum potential adverse impacts resulting from noise and avoid noise giving rise to significant adverse impacts on health and the quality of life.

6.155 Local Plan Policy DM23 - Environmental Protection, of the Development Management DPD states 'the Council will seek to ensure that new noise sensitive development is located away from existing or planned sources of noise pollution. Proposals for potentially noisy development must suitably demonstrate that measures will be implemented to mitigate its impact.'

6.156 The proposals have been designed to ensure that there is no unacceptable impact on the amenity of surrounding properties or future residents of the development in relation to noise. A detailed Noise Impact Assessment was prepared in support of the planning application as forms part of the submission.

6.157 In order to assess the potential for the impact of environmental noise on the new apartments and give minimum acoustic performance specifications for the external building fabric, a noise survey has been undertaken. Guidance on permissible internal

noise levels has been taken from BS 8233: 2014 'Guidance on sound insulation and noise reduction for buildings'.

- 6.158 A Noise Impact Assessment has been undertaken as part of preparing the application and concludes that ambient noise levels are quite low, and the site is suitable for residential use. As highlighted above, in order to mitigate overheating residents will open bedroom windows particularly at night and their acoustic comfort must also be taken into consideration. The assessment shows that when windows are open by 28 degrees the expected indoor noise levels are acceptable measured against Building Regulations criteria.
- 6.159 The proposed plant including roof mounted Air Source Heat Pump (ASHP) equipment will be enclosed by acoustic louvred screening so that the noise levels experienced by neighbours is lower than existing background ambient noise levels.
- 6.160 The Noise Impact Assessment prepared by Max Fordham and accompanying this application sets out the assessment in detail.

Flood risk and drainage

- 6.161 Local Plan Policies SP5 - Water Management and Flooding (Strategic Policies DPD) and DM24 - Managing and Reducing Flood Risk (Development Policies DPD), seek to ensure that new development reduces the risk of flooding and provide suitable measures for drainage.
- 6.162 A detailed Flood Risk Assessment and Drainage Strategy form part of the planning application. The site is deemed to be at low risk of flooding from all sources of flooding. The site is in a Critical Drainage Area however flood maps indicate only a small area of the site where there is an existing car parking area on Braemar Road is at risk of surface water flooding.
- 6.163 In relation to Sustainable Urban Drainage to assist in managing surface water run-off a combination of substantial new planting, green roofs, rain gardens and rainwater attenuation tanks is proposed to slow the flow of water into the public surface water drainage network. These measures will attenuate discharge rates to as close to Greenfield run-off rates as reasonably practicable. The assessment undertaken shows a betterment to the existing 1 in 100-year peak discharge rates of 98%.
- 6.164 Two underground attenuation tanks are proposed, in the shared gardens between the proposed buildings. The tanks are set sufficiently deep below ground to allow the area above to be fully landscaped and for tree pits. The benefits of these systems include ecological enhancements and improved water quality.
- 6.165 For further details please refer to the Flood Risk Assessment and the Drainage Strategy Report (including SUDS strategy) prepared by Meinhardt (UK) Ltd.

Ground conditions and contamination

- 6.166 Policy DM23 – Environmental protection, of Development Management DPD requires proposals to demonstrate that any risks associated with land contamination can be adequately addressed to make the development safe.

- 6.167 A Geotechnical Design Report has been prepared which provides an interpretation of the findings from the ground contamination investigation undertaken at the site and assesses the key geotechnical considerations associated with the proposed development.
- 6.168 The report highlights the possible presence of asbestos contaminated material (ACM) and recommends that further ground investigation is undertaken to identify whether ACM fragments are present and to delineate any impacts and remediate as necessary.
- 6.169 The report also highlights that the ground gas and soil vapour assessments are provisional as the monitoring undertaken to date does not capture a low atmospheric event and for this reason it recommends that further monitoring is undertaken to provide a more robust dataset before ground gas and soil vapour assessment are finalised. Once this is done, the requirement for any relevant remedial actions can be confirmed.
- 6.170 It is considered that risks to site workers and the environment during the construction phase of the proposed redevelopment can be appropriately managed by the successful implementation of the construction phase risk assessments and method statements.

7 CIL AND PLANNING OBLIGATIONS

Community Infrastructure Levy (CIL)

- 7.1 The Mayoral CIL 2 (MCIL2) Charging Schedule came into effect on 1 April 2019 and applies to all developments across all London Boroughs where applications propose new build floorspace greater than 100 square metres. For Haringey, the charging rate is set at £60 per square metre across all uses.
- 7.2 Haringey implemented their CIL Charging Schedule in November 2014, and the CIL Rate Summary (March 2022) sets a rate of £50 per square metre for residential (Use Class C3) which falls in the 'Eastern' Zone of the Borough. Office and retail uses do not currently require a contribution to be made.
- 7.3 The proposed development is liable for both Local CIL and Mayoral CIL. It is also however potentially exempt given it proposes a fully affordable housing scheme.

Planning obligations

- 7.4 Regulation 122 (Limitation on use of planning obligations) states that a planning obligation may only constitute a reason for granting planning permission for the development if the obligation is necessary to make the development acceptable in planning terms, directly related to the development and fairly and reasonably related in scale and kind to the development.
- 7.5 Paragraph 54 of the NPPF (2019) states that local planning authorities should consider whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations. Planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition. Paragraph 55 explains that planning conditions should be kept to a minimum and only imposed where they are necessary, relevant to planning and to the development to be permitted, enforceable, precise and reasonable in all other respects.
- 7.6 The LBH Section 106 SPD (2018) sets out the Council's approach to the use of Section 106

Planning Obligations following the introduction of Regulation 122 and 123 of the Community Infrastructure Levy Regulations 2010. Subject to conformity with Regulations 122 d 123, and further negotiations, planning obligations may be sought, and the applicant is willing to enter into discussions with the Local Planning Authority as necessary.

- 7.7 As the Council is also the applicant in this instance, it is unable to enter into a Section 106 Agreement with itself and therefore it is proposed instead that an alternative agreement is prepared that will include the relevant planning obligations including financial contributions. Having regard to the policy framework and related guidance, it is proposed that this agreement will contain planning obligations including financial contributions in relation to the following key matters:

- Provision of Affordable Housing
- Travel Planning
- Traffic Management Order
- Employment and Skills
- Off-site landscaping works
- Highway works
- Monitoring and implementation

- 7.8 The negotiation of the above detailed obligations will have regard to all relevant site-specific constraints and considerations, any CIL liability and the overall viability of the development. The suggested topics are provided on a without prejudice basis.

8 CONCLUSIONS

- 8.1 The proposed development will comprehensively transform an under-used brownfield site to deliver much needed high-quality affordable housing and significant local environmental improvements.
- 8.2 The proposed development has benefited from pre-application meetings with LB Haringey Planning Department and other Council departments and has been developed following pre-application engagement with the local community.
- 8.3 The proposals have been designed having regard to the location, nature and constraints of the site, the character and appearance of the surrounding area and neighbouring amenity.
- 8.4 The scheme is well planned, carefully designed and sympathetic to its context. It optimises the potential of the site for a wide range of affordable housing and creates an attractive, safe, inclusive, and accessible new residential environment, in accordance with policy at all levels.
- 8.5 On the basis of the above, this Planning Statement, together with the supporting technical documents and reports, have demonstrated that this high-quality scheme is acceptable and sustainable development in accordance with the NPPF, London Plan and Local Plan.

