

Planning Statement

Land adjacent Wat
Tyler House, Boyton
Road, Hornsey,
London, N8 7AU

London Borough of Haringey

October 2022

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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 adjacent Wat Tyler house, Boyton Road, Hornsey, London, N8 7AU, Haringey for residential use and
- 1.2 The description of development is as follows:
- “Redevelopment of the car park adjacent Wat Tyler House to provide 15 new Council rent homes in a part-4, 5 and 7-storey building. Provision of associated amenity space, cycle and refuse/recycling stores, a wheelchair parking space on Boyton Road and enhancement of existing communal areas and play space to the rear on the Campsbourne 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 adjacent Wat Tyler House, Boyton Road 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 car park forming part of the Campsbourne Estate, a post-war Council development.
- 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 15 Council homes in a carefully designed building with associated refuse/recycling and cycle storage facilities, amenity space and landscaping. They also entail the enhancement of existing communal areas and play spaces on the Campsbourne 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 prepared by Syntegra Consulting
 - Arboricultural Report prepared by Arbtech
 - BNF Report prepared by Eight Versa
 - Construction Logistic Plan prepared by Campbell Reith
 - Daylight and Sunlight Assessment prepared by Right of Light Consulting
 - Design and Access Statement prepared by KC & A Architects
 - Phase 1 Environmental Report prepared by GO Contaminated Land Solutions
 - Fire Strategy prepared by Vemco
 - Landscape Design Report prepared by Remapp
 - Lifetime Carbon Assessment prepared by JAW Sustainability
 - Noise Impact Assessment prepared by Syntegra Consulting
 - Planning Statement prepared by London Borough of Haringey
 - Preliminary Ecological Appraisal prepared by Eight Versa
 - Statement of Community Involvement (SCI) prepared London Borough of Haringey
 - SuDS Strategy prepared by Eight Versa
 - Sustainability, Energy and Overheating Assessments prepared by Eight Versa
 - Transport Statement prepared by Caneparo Associates
 - UGF Report prepared by Eight Versa
- 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 development of the site for residential use (Class C3) with associated amenity space and landscaping, and the enhancement of existing communal areas and play spaces in the Campsbourne Estate.
- 2.2 The intended approach, as indicated in the plans submitted is to redevelop 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 Campsbourne Estate and delivers significant environmental improvements for the benefit of existing residents and the surrounding community.
- 2.3 In detail, the application scheme comprises:
- 15 apartments (incl. 1 wheelchair adapted home)
 - Refuse/recycling and cycle stores
 - Lift and staircore
 - 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
 - New lighting and CCTV
 - One on-street wheelchair accessible parking space
- 2.4 The proposed 15 homes and associated infrastructure will be contained within a single building accessed via a main entrance fronting Boyton Road. The wheelchair user home is located on the ground floor level as is a larger family dwelling and each has its own private amenity space.
- 2.5 Shared facilities for the proposed homes include cycle and refuse/recycling stores, which are located on the ground-floor level and accessed via the main entrance and a side passageway respectively.
- 2.6 The proposed homes are at least dual aspect, incorporate storage and include terraces or balconies which comply with the relevant planning policy space standards.
- 2.7 As part of developing the new homes, improvements are proposed to the existing communal areas, amenity and play spaces on the Campsbourne Estate within the vicinity of the site. These include new hard and soft landscaping, tree planting, boundary treatments, play equipment,

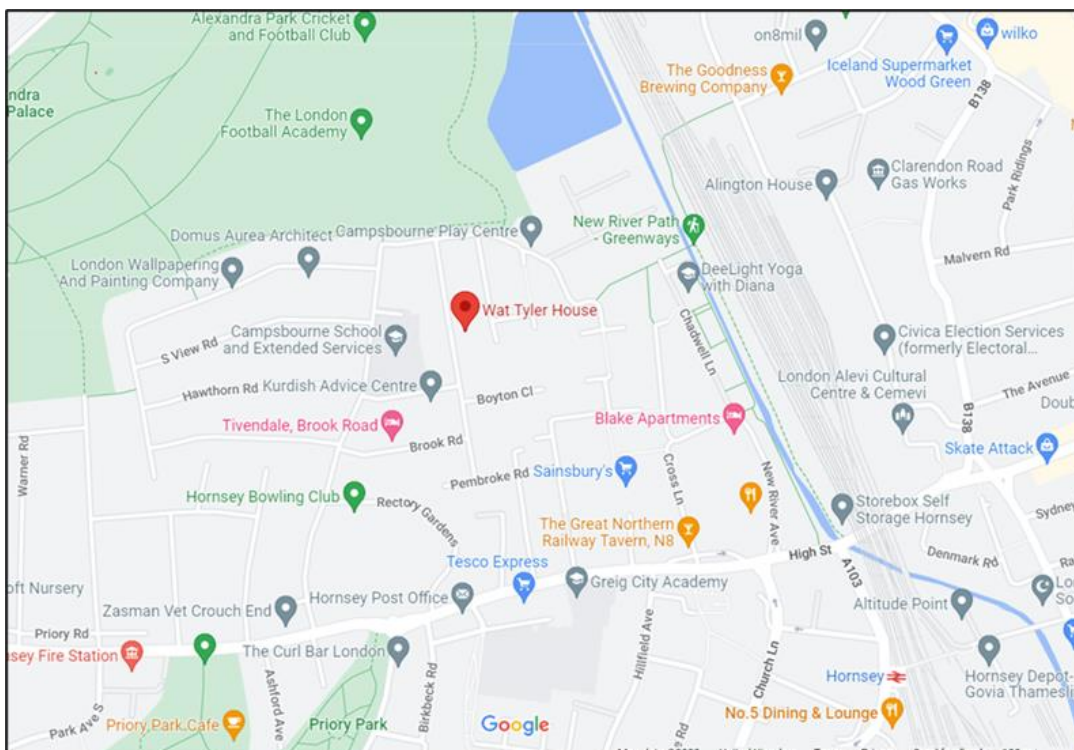
seating, and cycle storage hangars. In addition, new lighting and CCTV will be provided to enhance the security and safety of the area. These measures are intended to ensure the setting of the new development is appropriate and the environmental quality, amenity and biodiversity of the estate are improved for the benefit of all residents.

- 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 building reflects the shape of the site, its boundary conditions, and the nature of the local built environment, including views from the Conservation Area and neighbouring residential and visual amenity. It varies in height from four to five and seven-storeys to optimise the number of affordable homes, respect the scale of neighbouring property and present an appropriate street frontage.
- 2.9 In addition to the overall configuration of the development, the architectural style of the proposed building has also been carefully considered to respond to the local context and enhance the surrounding townscape. The new building will have an attractive and contemporary appearance using traditional materials including high-quality brickwork and contrasting detailing and carefully positioned and proportioned windows and balconies. The simple articulation of the elevations seeks to complement the proportions of the buildings and provide a distinctive and robust architectural language
- 2.10 The proposed development has sought to adopt a progressive approach to sustainability and deliver a zero-carbon scheme, if possible. The proposed building adopts a ‘fabric-first’ design with high levels of insulation and incorporate features such as energy efficient heating including Air Source Heat Pumps for each dwelling and photovoltaic panels at roof level, that will keep running costs low. Appropriate measures have also been included to mitigate against the risk of the new homes overheating.
- 2.11 The scheme achieves a total carbon emission saving of 83.9% over the baseline requirements under the Building Regulations and it will be also 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.

3. SITE AND SURROUNDING CONTEXT

- 3.1 The development site is located on land adjacent Wat Tyler House forming part of the Campsbourne Estate, Boyton Road in the Hornsey Ward of the Borough of Haringey. It comprises a car park serving the estate (see location plan and site photographs and below).
- 3.2 The car park accommodates 24 spaces, accessed off Boyton Road and managed by the Council’s Asset’s Team. A pedestrian pathway runs along the eastern boundary of the car park connecting through from the northern section of Campsbourne Road and Boyton Close. Continuing south another alley to connects Boyton Close with the southern part of Campsbourne Road.
- 3.3 To the north of the site lies Wat Tyler House, a substantial seven-storey residential council block of flats fronting Boyton Road. Accommodation at first floor bridges over a paved area under the building that provides a pedestrian connection from Boyton Road to the communal garden area to the rear and to Campsfield Road to the east.
- 3.4 Opposite the site on the western side of Boyton Road is Bedale House a three-storey plus

pitched roof council building of retirement flats. To the immediate south lies Tennyson House also three-storeys. The back gardens of two storey houses at 1 and 2 Boyton Close border the southern boundary of the site behind Tennyson House. To the east of Wat Tyler House lie a series of residential buildings including Campsfield House, Gillett House and Myddelton House. Campsfield House which is three-storey, and its garden borders the eastern boundary of the site.



Location plan of site

- 3.5 Buildings in the immediate neighbourhood are predominantly apartment blocks and heights range between three-storeys plus roof to five and seven-storeys.
- 3.6 To the rear of Wat Tyler House is a communal garden/play space and a parking area and to the east of Campsfield House and behind Gillett House is a playground. Another alley connects the playground to the alley at the rear of the site.
- 3.7 The permeability through the Campsbourne Estate, limited natural surveillance and the ambiguous nature of the open amenity spaces including alleyways, communal gardens and play areas can make the area feel unwelcoming and have unfortunately contributed to a history of anti-social behaviour and crime locally.
- 3.8 The wider area is predominantly residential in character accommodating a range of property types and styles. Buildings in the immediate neighbourhood are mainly multi-storey post-war apartment blocks whilst more traditional streets of terraced housing lie beyond.
- 3.9 Despite its established residential location, there are many services and amenities that can be accessed from the site by sustainable transport modes including walking, cycling and public transport.
- 3.10 The Public Transport Accessibility Level (PTAL) of the site is 1b which is considered a 'very poor' level of accessibility by Transport for London. However, the site is within a short walking distance (approximately 10mins – 0.6miles) from Hornsey Station to the south and a similar

distance to Alexandra Palace station to the north. It is also close to Hornsey High Street which is well served by local bus routes with access to two routes from here.



Aerial photograph of site and surrounding area

- 3.11 The site does not fall within a conservation area, however there are three conservation areas nearby including those of Alexandra Palace and Park to the north, Campsbourne to the north-west and Hornsey High Street to the south.



Photograph of car park from Boyton Road

4. HISTORY

Planning and development history

- 4.1 In terms of how the site has changed overtime, its nature and form can be explained by its planning and development history and an understanding of this has assisted in informing the design process.
- 4.2 The site historically accommodated a row of traditional terraced housing forming part of the wider Victorian residential area, prior to being redeveloped as part of the Campsbourne Estate during the post-war period.
- 4.3 It is not subject to any specific planning policy designations, but it is located with Flood Zone 1.
- 4.4 As part of the Estate, flanked by Wat Tyler House and Tennyson House, the site serves as a car park and provides access to communal areas and alleyways to the rear. It is not readily overlooked by neighbouring property and partly as a result, has attracted high levels of anti-social behaviour.
- 4.5 The proposed scheme has been prepared having regard to the history of the site, its current condition, and the local planning policy context.

Pre-application engagement

- 4.6 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.
- 4.7 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.
- 4.8 In their final report, the QRP summarised its views of a latter iteration of the proposals as follows:

“The Quality Review Panel welcomes the opportunity to comment on the evolving proposals for the development site adjacent to Wat Tyler House. This infill site represents a good opportunity for the development of new Council homes. The panel also welcomes the project team’s commitment to a comprehensive local community engagement process concerning the proposals (when current restrictions are lifted) and highlights that residents’ input and agreement will be extremely important.

The panel supports the broad principles of the scheme, subject to some improvement and refinement. It feels that the scale of the proposals is ambitious but nonetheless broadly acceptable. As design work continues, the panel would encourage further work to refine the residential layout, its circulation cores, and relationship to the public realm adjacent. Consideration of future potential phases

of work will also help to inform this process. While the panel generally supports the approach taken to the architectural expression, this could be made more distinctive by drawing on the character and qualities of Wat Tyler House, and by giving the main entrance more emphasis.

A clear strategy for pedestrian, cycle and vehicle movement around the estate will be critically important to the success of the scheme. A lot of potential exists for the development to improve the quality, safety and design of the public realm adjacent to the development. It highlights that the wider benefits of this work can help to establish a strong justification for the scheme."

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

"The site represents a good opportunity for the development of new Council homes. The panel feels that the scale of the proposals is ambitious, but nonetheless broadly acceptable, subject to the resolution of issues around the quality and design of the accommodation (with particular reference to the ground floor) and the detail and design of the public realm adjacent.

The panel considers that the architectural concept of three interlocking volumes seems sensible."

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

"While the panel generally supports the approach taken to the architectural expression of the infill development, reflecting some of the qualities of Wat Tyler House could make it more distinctive.

The panel also wonders whether the taller section of building could also visually reflect some of the horizontal alignments seen within the elevations of Wat Tyler House in some way.

It would also support further consideration of how the scheme engages with the street at a detailed level; options to celebrate the main entrance and enliven the main entrance frontage would be supported."

- 4.9 In relation to sustainability, the Panel welcomed the creation of much-needed new homes in underutilised areas of the existing housing estate and supported the aspiration for zero carbon development and a 'fabric first' approach. It also highlighted the design and location of fenestration will play an important role in achieving energy efficiency, and the way the balconies help protect west facing glazing from overheating is helpful.

- 4.10 The Panel did raise however a number of issues it considered should be explored further and addressed including:

- Pedestrian routes/narrow alleyways and lack passive surveillance presenting opportunities for crime and antisocial behaviour
- Open space to the rear of Wat Tyler House
- Loss of green open space and trees - scheme should protect and enhance all the existing green and open spaces within the estate
- The movement strategy, parking within the estate, landscape design and the issue of

alleyways would benefit from being considered as part of the community engagement process

- Future phases of development - which may include infill of the undercroft in addition to further possible 'bookend' developments.

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. Its 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 areas 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 D9** (Tall buildings); **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 Whilst high density does not need to imply high rise, the London Plan states that tall buildings defined as 6 storeys or 18 metres high, can form part of a plan-led approach to managing future growth, contributing to new homes and economic growth, particularly to make optimal use of the capacity of sites which are well-connected by public transport and have good access to services and amenities. It goes on to state that tall buildings can help people navigate through the city by providing reference points and emphasising the

hierarchy of a place such as its main centres of activity, and important street junctions and transport interchanges. Tall buildings that are of exemplary architectural quality, in the right place, can make a positive contribution to London's cityscape, and many tall buildings have become a valued part of London's identity.

- 5.27 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 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

- 6.18 The site is not covered by any specific planning policy designations but lies within Flood Zone 1 (which is an area with a low probability of flooding). The wider area accommodates three conservation areas including Alexandra Palace and Park to the north, Campsbourne to the north-west and Hornsey High Street to the south.
- 6.19 It represents Brownfield Land (land currently or formerly developed) and is located in an established and accessible residential area, typical of many urban neighbourhoods in London. It serves as a car park for the adjoining Campsbourne Estate, and forms one of a number of development opportunities the Council has identified as part of its Housing Delivery Programme seeking to use public owned land more effectively to build new council homes to meet local need.
- 6.20 Along with adjoining communal areas and landscaping on the Campsbourne Estate, the site is a poor-quality environment, appears unwelcoming and attracts significant levels of anti-social activity. The proposals presented in this application seek to not only make more effective use of the site for new, sustainable, and affordable housing but to ensure its redevelopment enhances the environmental quality and amenity of this end of the Estate with new and improved hard and soft landscaping and play spaces for the benefit of existing residents.
- 6.21 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.
- 6.22 The site is close to a wide range of amenities including public transport services, 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.
- 6.23 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.
- 6.24 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.
- 6.25 In summary, the proposals seek to redevelop a brownfield site, in an established residential area and the principle of a residential use in this location is supported by national, regional, and local policy, which identify housing as a strategic need. The provision of 15 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 improvements to the environmental quality and appearance of the site and adjoining

estate land to enhance both the setting of the new development and the quality, functionality, safety, and attractiveness of the surrounding area for existing and future residents.

Residential mix

Policy context

- 6.26 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.
- 6.27 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.
- 6.28 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.
- 6.29 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.
- 6.30 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.
- 6.31 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.

Assessment

- 6.32 The proposed development will provide 15 new affordable dwellings comprising a range of sizes to meet local housing need as follows:
- 6 x 1 Bed 2 Person flats (including 1 wheelchair adapted) – 40%
 - 5 x 2 Bed 3 Person flats – 33%
 - 3 x 2 Bed 4 Person flats – 20%

- 1 x 3 Bed 4 Person flats – 7%

- 6.33 The type of accommodation has been informed by a detailed design process and viability exercise to ensure a planning compliant and deliverable scheme.
- 6.34 The development was challenging to plan by virtue of the shape and constrained nature of the site, its boundary conditions and proximity of neighbouring property. 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. The layout of the development is efficiently planned to deliver 1-, 2- and 3-bedroom apartments including a wheelchair adapted home and associated amenity space.
- 6.35 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.
- 6.36 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

- 6.37 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.
- 6.38 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.
- 6.39 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

- 6.40 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.

- 6.41 The 15 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

- 6.42 The Nationally Described Space Standards set out the minimum space requirements for new housing.
- 6.43 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.
- 6.44 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.
- 6.45 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

- 6.46 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 one dwelling achieves 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

guidance.

- 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.
- Secure By Design accreditation.
- Enhanced public realm, communal amenity areas and play-spaces.
- New high-quality landscaping including tree planting to improve increase urban greening and biodiversity.
- New lighting and CCTV.
- Provision of one on-street wheelchair accessible parking space.

6.47 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.

6.48 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

6.49 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.

6.50 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.

6.51 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.

6.52 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.'

- 6.53 London Plan Policy D9 - Tall buildings, states that tall buildings are based on local context and that Development Plans should define what is considered a tall building for specific localities, the height of which will vary between and within different parts of London but should not be less than 6 storeys or 18 metres measured from ground to the floor level of the uppermost storey. Its supporting text explains that generally tall buildings are substantially taller than their surroundings and cause a significant change to the skyline.
- 6.54 Policy D9 goes onto state that development proposals should address the following impacts:
- 1) visual impacts:
 - a) the views of buildings from different distances:
 - i long-range views – these require attention to be paid to the design of the top of the building. It should make a positive contribution to the existing and emerging skyline and not adversely affect local or strategic views;
 - ii mid-range views from the surrounding neighbourhood – particular attention should be paid to the form and proportions of the building. It should make a positive contribution to the local townscape in terms of legibility, proportions and materiality;
 - iii immediate views from the surrounding streets – attention should be paid to the base of the building. It should have a direct relationship with the street, maintaining the pedestrian scale, character and vitality of the street. Where the edges of the site are adjacent to buildings of significantly lower height or parks and other open spaces there should be an appropriate transition in scale between the tall building and its surrounding context to protect amenity or privacy.
 - b) whether part of a group or stand-alone, tall buildings should reinforce the spatial hierarchy of the local and wider context and aid legibility and wayfinding.
 - c) architectural quality and materials should be of an exemplary standard to ensure that the appearance and architectural integrity of the building is maintained through its lifespan.
 - d) proposals should take account of, and avoid harm to, the significance of London's heritage assets and their settings. Proposals resulting in harm will require clear and convincing justification, demonstrating that alternatives have been explored and that there are clear public benefits that outweigh that harm. The buildings should positively contribute to the character of the area.
- 6.55 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.
- 6.56 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.

- 6.57 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.
- 6.58 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.
- 6.59 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.
- 6.60 Policy DM9 - Management of the Historic Environment, states that development should sustain and enhance the significance of heritage assets.

Assessment

- 6.61 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.
- 6.62 The design of the proposed development seeks to optimise the potential of the site to deliver high-quality affordable accommodation and enhance the adjoining external environment and amenities of the Campsbourne 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.
- 6.63 In particular, the site is rectangular in shape, flanked by blank walls of adjoining blocks of flats and presents an open frontage onto Boyton Road. Along with adjoining communal spaces and routes on the Campsbourne Estate it represents a poor-quality urban environment, appears unwelcoming and attracts significant levels of anti-social behaviour. 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. It is notable however that the site is close to three conservation areas including those of Alexandra Palace and Park to the north, Campsbourne to the north-west and Hornsey High Street to the south.

- 6.64 In exploring the redevelopment opportunities presented by the site, a range of options to optimise the number and type of affordable housing and enhance local amenity were explored. These were informed by studies covering matters such as visual/townscape impact, sunlight/daylight and comments and advice received from the community and the Local Planning Authority including the Quality Review Panel. The preferred scheme, as proposed in this application will provide for a range of high-quality homes and external amenity space, in addition to improving the environmental quality and amenity of adjoining land on the Campsbourne Estate through an appropriate landscaping strategy.
- 6.65 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 building reflects the shape of the site, its boundary conditions and the nature of the local built environment including the conservation areas nearby.
- 6.66 The scheme seeks to enhance the character and appearance of the site and surrounding area by essentially infilling gap the along Boyton Road formed by the car park and present a new active street frontage. The scale and massing of the proposed building complements this approach and varies in height four to seven-storeys to respond to the position and scale of adjoining property, safeguard neighbouring residential amenity and respect views to and from the Conservation Areas.
- 6.67 The proposed building has 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.
- 6.68 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. In addition, therefore to the overall configuration of the development, the architectural style of the proposed building has been carefully considered to respond to the local context and enhance the townscape. The new residential block will have an attractive and contemporary appearance using durable and traditional materials including high-quality brick, stone and metalwork and contrasting detailing, and carefully positioned and proportioned windows and balconies. The ground floor has been expressed to form a base to the building. The large, recessed area forms an entrance canopy and hit and miss brick work wraps around grounding the building.
- 6.69 In respect to the specific materials proposed, the three differing storey elements of the building are expressed in three different types of brick each with a matching mortar colour. The colours which include, red and two shades of buff relate to the red brick found on Wat Tyler House and the buff shades of brick found at Tennyson and Campsfield Houses and in the wider neighbourhood. To add a layer of detail, recessed panels of brick work linking windows either horizontally or vertically are highlighted with contrasting brick bonds.

Reconstituted stone bands form a sill where windows are linked. All metalwork: balcony balustrades, external shading, window frames, rainwater goods and architectural metalwork are finished in a dark brown- grey powder coating

- 6.70 The simple and balanced articulation of the elevations and their materiality seeks to complement the proportions of the building and provide a distinctive and robust architectural language.
- 6.71 The height, form and massing of the proposed building and its architectural treatment is critical in relation to how it fits into its immediate context and in relation to neighbouring property, but it is also important to consider how it appears within the wider urban setting. As mentioned earlier and detailed in the Design and Access Statement (DAS), the surrounding context of the site is diverse ranging from traditional two-storey fine grain housing to large post-war developments comprising low and high-rise residential accommodation. A number of non-residential buildings including schools are also present, as are green open spaces in close proximity to the site, which contribute significantly to the character of the area.
- 6.72 The nature of the wider area is also defined by the three local conservation area designations. The Alexandra Palace and Park Conservation Area to the north of the site, Campsbourne Conservation Area to the north-west and Hornsey High Street Conservation Area to the south. There are no strategic or locally protected views, or statutorily or locally listed buildings in the vicinity of the site.
- 6.73 For all development proposals, planning policy expects building heights to be of an appropriate scale which respond positively to the site's surroundings, the local context, and the need to achieve a high standard of design. Haringey's Development Management plan defines both 'taller' buildings and 'tall' buildings. Taller buildings are defined as those that are two to three storeys higher than the prevailing surrounding building heights. Tall buildings are defined in the Strategic Policies Local Plan as being buildings 10-storeys and over. The London Plan leaves it to local Development Plans to define what is a 'tall building'. It also states that tall buildings are generally those that are substantially taller than their surroundings and cause a significant change to the skyline. It also states that tall buildings are not less than 6-storeys or 18 metres measured from ground to the floor level of the uppermost storey.
- 6.74 The proposed development has been considered carefully to ensure it respects the character and appearance of the surrounding area having regard to the relevant planning policy and guidance noted above. The proposed building will sit between two existing buildings fronting Boyton and will effectively form part of the built environment of the Campsbourne Estate.
- 6.75 The top floor of the proposed building will be over 18m from the ground floor, and 7-storeys in height. The prevailing building height in the neighbourhood is set by Wat Tyler House at 7-storeys and Bedale, Tennyson and Campsfield Houses at 3 storeys. The proposed building is composed of three parts, 4-storeys in height, 5-storeys in height and 7-storeys in height. The tallest 7-storey part of the building is taller than Wat Tyler House due to taller floor to floor heights but not substantially taller. The 5-storey section of the building facing Boyton Road is 2-storeys taller than Tennyson House and the 4-storey element at the rear is only 1-storey taller than Campsfield House.
- 6.76 The proposal is therefore not a 'tall' building as it is not 10-storeys as defined in local

planning policy. It is also not substantially taller than its surroundings and not 2 to 3 storeys higher than the prevailing building heights in the neighbourhood. It therefore does not meet the definition of a 'taller' building either.

- 6.77 Planning policy also seeks ensure that the historic interest and character of conservation Areas are preserved or enhanced. Although as previously noted, the site is located outside the conservation areas the height and visibility of the proposed building should be assessed to see that it does not erode or fragment their character.
- 6.78 The proposed building will be visible in views from within Alexandra Palace and Park and Campsbourne Conservation Areas. Views from the top of Alexandra Palace and Park looking down over the estate will largely be unaffected by the proposed building by virtue of its small footprint and similar height to Wat Tyler House. Wat Tyler House is a large and tall building of 7-storeys in height which is partly visible across the school play grounds from the Campsbourne conservation area. The presence of the proposed new building adjacent to Wat Tyler is not expected to compromise the character of the Campsbourne Conservation Area. As discussed earlier the proposed building is unlikely to be visible from Hornsey High Street Conservation Area and any glimpse that might be possible would result in an insignificant impact.
- 6.79 In conclusion, 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 safeguard neighbouring visual and residential amenity and deliver a high-quality residential environment for the benefit of existing and future residents.
- 6.80 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

- 6.81 In respect to existing landscaping on the site, this comprises hardstanding marked out as a car park for 24 spaces and a paved pathway running along its northern end linking communal areas on the Campsbourne Estate to the west and an alleyway to the east. The communal areas which the application proposals seek to improve comprise of public realm, footways, hard and soft landscaping, shared amenity and play spaces.
- 6.82 Whilst the existing site and adjoining land on the Campsbourne Estate are not considered to present a high-quality urban environment, they provide an opportunity as part of a new residential development to significantly enhance the character, appearance and use of the area for the benefit of existing and future residents.
- 6.83 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.

- 6.84 London Plan Policy G6 - Biodiversity and access to nature, aims to manage impacts on biodiversity and aim to secure biodiversity net gain.
- 6.85 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.
- 6.86 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".
- 6.87 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).
- 6.88 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 PolicyDM21 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

- 6.89 The application proposes the redevelopment of a car park site and landscaping improvements adjoining land on an existing Council 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.
- 6.90 The site presents an opportunity to redevelop and make better use Brownfield land and enhance the environmental quality and amenity of this part of the Campsbourne Estate. An indicative but detailed hard and soft landscaping strategy has been prepared to ensure that the setting of the new development and adjoining areas are attractive and complementary, and the environmental quality, security and amenities of this part of the Estate are significantly improved for the benefit of existing and future residents. As highlighted previously in this report, the landscaping proposals will create new and enhance existing shared amenity and play space, incorporate substantial new planting including new and replacement trees, new paving and new communal cycle storage facilities.
- 6.91 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 new

residents only, and new lighting and CCTV installed to reduce opportunities for anti-social and criminal behaviour.

6.92 The landscaping strategy as set out in detail in the Landscaping Design and Access Statement, prepared by Remapp and accompanying this submission, comprises four key areas to ensure new and enhanced provision responds appropriately to the location, nature and function of the different spaces across the site and adjoining land. The key areas identified are:

- Development site
- Existing Frontage Area to Wat Tyler House
- Existing Communal Garden to the rear of Wat Tyler House.
- Existing Play Area behind Gillett House

6.93 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

6.94 In relation to sustainable urban drainage (SuDs) arrangements to manage surface water run-off and enhance biodiversity, a combination of substantial new planting, green roofs, a rainwater attenuation tank, and pervious paving are proposed. The preliminary hydraulic modelling by Eight Versa as contained in the SUDs Report accompanying this application, demonstrates that the proposed SuDs components would be viable in order to achieve the targeted discharge rates, whilst mitigating flood risk to the site and surrounding area. The attenuation storage tank located under the rear garden of the proposed building will for instance ensure a greater than 50% betterment against the pre-development run-off rates.

6.95 The proposals have been developed to retain high quality trees and replace any trees proposed for removal with new tree planting on the site.

6.96 There are no trees on the existing car park subject to redevelopment but there are trees on the adjoining land to be enhanced. A full tree survey of the existing trees here has been carried out. It is proposed to remove three existing trees in the existing communal amenity/play space to the rear of Wat Tyler House which are in poor condition. Two are category C and one is category U. Their removal will facilitate the proposed improvements to the amenity space.

- 6.97 In total 18 new trees are proposed resulting in a net increase of 15 trees within the neighbourhood. The Arboricultural Report prepared by Arbtech and the Landscape Design and Access Statement by Remapp provides further information in relation to the proposed tree planting proposals.
- 6.98 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 biodiversity of the site and adjoining land and to contribute to the level of urban greening locally. 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 1.73, exceeding the minimum target score of 0.4.
- 6.99 For further details of the UGF please refer to the UGF Report by Eight Versa and Landscape DAS prepared by Remapp.
- 6.100 The proposed development introduces a range of affordable housing into the area. 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 future residents.
- 6.101 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 101.6 sqm for the proposed accommodation.
- 6.102 Given the size and constraints of the site and the existence of play space nearby on the Campsbourne Estate, no new communal play space provision is being provided as part of the development. The application does however seek to significantly enhance the two communal play areas to the rear of the site to cater for the new accommodation and provide better amenities for existing residents.
- 6.103 As noted earlier in this report, there is a communal garden/play area at the back of Wat Tyler House measuring approximately 760 sqm and a formal play area measuring approximately 700 sqm to the rear of Gillett House. These existing spaces, measuring approximately 1460 sqm combined provide neither high-quality amenity nor play facilities and present opportunities for improvement. The proposals will incorporate new planting in these areas, play equipment, lighting, seating and surfacing to ensure they are more attractive and useable. The improved play facilities will benefit all ages groups.
- 6.104 The wider context as highlighted previously also provides a variety of play and sporting facilities/amenities for all ages, within walking distance of the site including at Alexandra Park and Priory Park.
- 6.105 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.

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

Ecology

Policy Context

- 6.108 At a national level, the NPPF states that the planning system should contribute to and enhance the natural and local environment (Paragraph 170-175).
- 6.109 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

- 6.110 An ecological survey was carried out of the site and adjoining land by Eight Versa. It concluded that the site has low ecological value, providing habitat for nesting birds, foraging and commuting bats and invertebrates. Also, that the development is expected to have little impact on designated statutory sites near to the development.
- 6.111 The survey made recommendations to mitigate any impact from the development and ensure that the site is enhanced for wildlife and a gain for biodiversity in line with national and local policy. The recommendations included:
- Installation of at least three bat boxes on the site
 - External lighting in line with BCT guidelines
 - Installation of at least four bird nesting boxes on the site
 - Stag beetle loggery
 - Hedgehog corridors
 - Invertebrate houses
 - Native planting
- 6.112 Following these recommendations landscape proposals have been developed as part of the landscape strategy which include extensive green roof, new hedgerows, shrubs, grass land, and new trees.
- 6.113 An assessment of the biodiversity net gain (BNG) of the proposals has been carried out by Eight Versa. BNG is defined as "development that leaves biodiversity in a better state than before. The target is a value of 10% BNG and the proposals achieve 15.5% habitat gains and 100% hedgerow gains, therefore exceeding the target.
- 6.114 For further details of the ecological condition of the site and proposed mitigation please refer to

the Preliminary Ecological Appraisal and Biodiversity Net Gain Report prepared by Eight Versa.

Impact on neighbouring amenity

Policy context

- 6.115 The proposed development has been carefully designed not only to ensure that the new accommodation is high-quality but critically to protect neighbouring residential amenity, and specifically in respect to safeguarding the outlook, privacy and sunlight/daylight enjoyed by residents of adjoining property.
- 6.116 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.
- 6.117 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.
- 6.118 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.
- 6.119 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.
- 6.120 Policy DM12 – Housing Design and Quality, requires new housing to take account of the privacy of neighbouring uses.

Assessment

- 6.121 The proposed development has sought to make more effective use of a Brownfield site in an established and accessible location through a comprehensive design 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 considered 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.

- 6.122 A sunlight/daylight assessment has been carried out by Right of Light Consulting and is submitted with the planning application which demonstrates adjoining property and amenity space bounding the site will not be unduly affected by the proposed development in this regard.
- 6.123 The assessment is based on the Building Research Establishment (BRE) guide 'Site Layout Planning for Daylight and Sunlight: a guide to good practice. The aim of the assessment is to consider the impact of the development on the light receivable by the neighbouring residential properties. The assessment looks at daylight to windows and overshadowing to gardens and open spaces.
- 6.124 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.
- 6.125 The assessment also looked at over shadowing and impact on gardens and concludes that all gardens and open spaces tested meet the BRE recommendations.
- 6.126 Right of Light Consulting conclude 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.
- 6.127 For the full assessment please refer to the Daylight and Sunlight Report by Right of Light Consulting accompanying the application.
- 6.128 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.
- 6.129 The built form of the new development has been carefully positioned so as not to affect the outlook of neighbouring windows in Wat Tyler House, Campsfield House and Tennyson House. The only exception is a north facing bay to Tennyson House which has such small windows that it does not effectively provide any outlook. They also appear to be secondary windows to a room which has its main outlook over Boyton Road.
- 6.130 The proposed apartments have been arranged internally in such a way as to orientate windows to habitable rooms away from neighbouring windows to protect neighbouring privacy. To prevent overlooking of the private gardens of 1 and 2 Boyton Close kitchen windows will have obscure glazing and bedroom windows have been angled to prevent a direct view. There is a shared communal garden at the rear of Campsfield House and whilst some proposed windows and balconies face towards it, they are some distance away and this will give rise to no more overlooking than from the upper floors of the existing building.
- 6.131 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

- 6.132 London Plan Policy D3 - Optimising site capacity through the design-led approach, states that development proposal should achieve safe, secure and inclusive environments.
- 6.133 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.
- 6.134 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

- 6.135 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 adjoining areas on the Campsbourne Estate and associated issues in respect to safety and security. This part of the estate presents a poor-quality external environment with limited amenity and consequently the area feels unwelcoming, unusable and attracts high levels of anti-social and criminal behaviour.
- 6.136 The proposed scheme design for the site been influenced by ‘Secure by Design’ principles and in doing so seeks to design out the opportunities for anti-social behaviour and crime. The development will eliminate routes through the site, increase natural surveillance, provide CCTV and improve lighting and the use and management of existing communal amenity and play space.
- 6.137 The Metropolitan Police Designing Out Crime Officer has provided advice in designing the scheme appropriately having regard to safety and security and the following specific measures are proposed:
- Pedestrian routes have been designed to ensure that they are visually open, direct, well used and well lit.
 - 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.
 - Main access doors are visible from the public realm for good surveillance, well-lit and away from any potential hiding places.

- Access to the building, the side passage and gardens to the ground floor is controlled. The building will have a visitor door entry system and an access control system.
- The side passage will be for maintenance and will be controlled by locked gate. This is also a fire escape route so will open outwards and have an emergency paddle handle on the inside.
- Private gardens will have a boundary fence and defensible planting and the dwellings have been orientated to create better surveillance opportunities, in particular to the rear alleyway.
- Communal mail delivery facility will be located within the building entrance and built following the criteria of the Secured by Design guide.
- Secure cycle stores are also provided with access control doors.
- External lighting will be provided to all the elevations containing a door set as well as the rear
- CCTV will be provided to the building and to the wider area. To the building a camera will cover the main entrance and side fire escape internally the bike stores, lift and common parts at each level.
- To the wider area the diagram shows the strategy to extend existing CCTV coverage to cover key sensitive areas. Firstly, to the alley behind the site and secondly to the north of Wat Tyler House. The detail design and final specification of the CCTV system will be carried out
- before construction.
- Enhanced communal space and public realm providing more attractive and usable amenity.

6.138 The scheme is designed to achieve a SBD Gold accreditation subject to additional detail provided at the technical stage.

Sustainability and energy

Policy Context

6.139 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.

6.140 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.

6.141 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.

6.142 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.

- 6.143 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

- 6.144 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.
- 6.145 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.
- 6.146 Taking a fabric first approach in line with Passivhaus principles the design proposals have been developed in order to optimise the orientation, glazing proportion and to minimise heat loss and maximise passive heat gain. In addition, the thermal efficiency (expressed as 'U' values) and air tightness specified for the building envelope have been maximised within the constraints of the development.
- 6.147 The scheme will incorporate triple glazing. Also, the air permeability of the envelope will be reduced to a 3 m³/hm²@50 Pascal which is significantly lower than the minimum value of 8 set by the Building Regulations. All these factors have been carefully balanced and optimised within the particular constraints relevant to this site.
- 6.148 To supplement the fabric first approach energy from space heating will be recycled using efficient mechanical ventilation with heat recovery (MVHR) systems within each apartment.
- 6.149 In reviewing clean and green energy strategies options for low carbon technologies were considered. Options such as Ground Source Heat Pumps (GSHP) and Air Source Heat Pumps (SHP) were reviewed and assessed against the energy demands of the scheme and viability. ASHP have been chosen to meet the schemes hot water and space heating demands and duct lengths to external walls have been minimized. These will be supplemented with Photo Voltaic panels as a more effective use of roof space than solar hot water. Heat pumps will be located at roof level within acoustically treated enclosures.
- 6.150 The development exceeds the targets set by the London Plan achieves 11.6% CO₂ reduction through energy efficiency measures, 'Be Lean' stage using SAP 10.2.

- 6.151 District energy or heating is not feasible and so there are no savings from the 'B Clean' stage. Savings achieved through renewable technologies as part of the 'Be Green' stage yield a further CO2 reduction of 72.3%.
- 6.152 Whilst the total on-site CO2 reduction of 83.9% is a significant improvement upon Building Regulations and the minimum on site target of 35% set by the London Plan, it has not been possible within the constraints of the site to reach net Zero Carbon on site. However, the Zero-carbon target can be achieved through a cash in lieu contribution to the Borough's carbon off-set fund.
- 6.153 For a detailed analysis please refer to the Energy and Overheating Assessment and SUDs Strategy prepared by Eight Versa accompanying the application.
- 6.154 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.
- 6.155 The design of the proposed building therefore takes account of overheating, having regard specifically to access to good levels of daylight and sunlight within homes, natural ventilation and security.
- 6.156 The design proposals follow the cooling hierarchy and use passive design measures to reduce potential overheating:
- The amount of heat entering the building has been reduced using balconies and external louvres to provide shading, careful sizing and orientation of windows specified to have low emissivity, high levels of insulation and air tightness, and the provision of green roofs at all levels to reduce energy absorbed by the roof.
 - Internal heat generation will be minimised through energy efficient lighting and minimising heating pipe runs.
 - 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.
 - Mechanical ventilation is provided which can make use of free cooling when outside temperature is below inside in summer months.
 - Active cooling systems are not required.
- 6.157 The overheating assessment was undertaken accordance with GLA guidance. The analysis models three Design Summer Years defined by CIBSE. DSY1 which is for a moderately warm summer, DSY2, a summer with a short intense warm spell and DSY3, a summer with a longer less intense warm spell. Performance is assessed against 3 criteria. Criteria 1 sets a limit to the percentage of time when habitable rooms are occupied that the temperature thresholds are exceeded. Criteria 2 looks at the number of hours bedrooms during sleeping hours exceed 26 degrees C. Criteria 3 looks at temperature in communal corridors.
- 6.158 Results from modelling by indicate that the scheme is compliant with all 3 overheating criteria as set out in Building Regulations Part O for DSY1.

- 6.159 For more extreme weather scenarios DSY 2 and DSY 3 the proposals meet Criteria 1. However, for night-time overheating in these extreme conditions a number of bedrooms do not meet criterion 2. The assessment assumes that if internal room temperatures do not exceed 23 degrees at 11 pm then occupants will not open windows and so in the analysis occupants do not benefit from cross ventilation built into the design proposals. However, the majority of the common parts meet the upper criterion 3.
- 6.160 For further details please refer to the Energy and Overheating Assessment prepared by Eight Versa accompanying the application.
- 6.161 A Whole Life Carbon Assessment (WLCA) has been carried by JAW Sustainability to demonstrate the embodied and operational carbon emissions for the proposed development. The aim of the life cycle carbon assessment is to estimate the carbon emissions resultant from the redevelopment of the land fronting Boyton Road, adjacent to Wat Tyler House, including those emissions embodied within building materials and those resultant from the construction and operation of the proposed building.
- 6.162 Whole life-cycle carbon emissions are the total greenhouse gas emissions arising from a development over its lifetime, from the emissions associated with raw material extraction, the manufacture and transport of building materials, to installation/construction, maintenance, and eventual material disposal. The assessment models the whole life carbon impact of the proposed design in accordance with RICS Guidance and GLA Sustainability Guidance, using SAP and OneClick LCA software.
- 6.163 The Benchmark set by the GLA for the embodied carbon of a residential building including life cycle stages A - C (excluding B6 and B7) is 1200 kgCO₂e/m². The total embodied carbon for lifecycle stages A – C for the proposed design is 826654 kgCO₂e. As a result, the total embodied carbon for the proposed design per m² is 721.8 kgCO₂e/m². This is significantly below the benchmark.
- 6.164 For full details of the assessment please refer to the Life Cycle Carbon Assessment prepared JAW Sustainability 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 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.
- 6.167 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.

- 6.168 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.
- 6.169 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.
- 6.170 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.
- 6.171 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

- 6.172 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 one on-site wheelchair accessible parking space. The proposals also will incorporate sustainable travel planning measures including secure cycle storage facilities and car-club and sharing arrangements.
- 6.173 The Public Transport Accessibility Level (PTAL) of the site is 1b, considered a poor level of accessibility, however Hornsey or Alexandra Palace stations are within reasonable walking distance just beyond the 960m cut off distance for inclusion in the PTAL measure. Along with local bus services, cycle and pedestrian routes, the site is located within easy reach of a wide range of local amenities including shops, community facilities and parks and open spaces.
- 6.174 The site is currently 24 car parking spaces, and these will be removed as a result of the development. Parking surveys of the area have been carried out to assess the level of parking overnight and during the day. The surveys undertaken show an average occupancy level of 84% on the adopted highway (using the recommended 5m parking bay length recommended in the Lambeth methodology 78 empty spaces out of 496 still remain available for use).

- 6.175 The Transport Statement by prepared sets out the impacts of the proposed development in respect to the access, highway and parking implications of the development and mitigating circumstances/measures. It concludes that sufficient parking capacity is available locally to cater for the cars currently parking on the site and the low level of car ownership expected to be associated with the development, such that existing residents would be able to park in the surrounding area.
- 6.176 A Travel Plan will be prepared in due course should the planning application receive consent. This will set out how 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.
- 6.177 Cycle parking arrangements for the proposed development are in accordance with planning policy requirements. 28 cycle spaces are provided for new residents and 2 external Sheffield stands for four visitor spaces. Two communal cycle stores in the form of 'bike hangars' are proposed near Wat Tyler House for use by existing residents on the Campsbourne Estate to encourage more sustainable modes of travel.
- 6.134 In terms of emergency fire access, this will be gained from Boyton Road, with a dry riser provided within the staircore of the proposed building and inlet value within 18m of a fire tender vehicle parked on the road frontage. Apartments and communal areas will be fire compartmented and have an automatic water fire suppression system (sprinklers) along with automatic fire detection systems in accordance with the Building Regulations. A firefighting staircase and firefighting shaft and lift will also be provided according to the current building regulations.
- 6.135 For full details of the transport, access, parking impacts please see the Transport Assessment and prepared by Caneparo Associates and in relation to fire access please refer to the DAS prepared by KC +A Architects and the Fire Strategy prepared by Vemco.
- 6.136 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
- 6.137 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

- 6.138 Policy D6 - Housing quality and standards, of the London Plan requires suitable waste and recycling storage facilities in all new developments.
- 6.139 Policy SP6 – Waste and recycling, of the Strategic Policies DPD requires well designed recycling facilities to be integrated into all new developments.
- 6.140 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.

- 6.141 Further guidance of waste and refuse is set out in Haringey's Sustainable Design SPD and its Waste Management Services guidance note.

Assessment

- 6.142 The waste storage arrangements are set out in the Design and Access Statement and Transport Assessment submitted with the application.
- 6.143 Provision will be made for residents to separate their refuse and recycling receptacles within each unit, with food waste also stored separately.
- 6.144 A communal refuse/recycling store is located within the proposed building accessed externally from Boyton Road with a dropped kerb. The arrangements are Building Regulations compliant and within the acceptable distance of each flat entrance.
- 6.145 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.
- 6.146 The waste storage and collection arrangements accordingly meet with the relevant local planning policy requirements and guidance.

Other environmental considerations

- 6.147 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.
- 6.148 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 has been carried out 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 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 prepared by Syntegra Consulting, 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 The assessment is based on the results of a noise measurement survey that has been carried out over a 24-hr period at the proposed development site and has considered the advice of local and national planning policy and best practice guidance. The initial site risk assessment identified that the site should be considered low-medium risk in terms of noise. Through careful consideration of the building envelope construction, the proposed development should avoid future residents being exposed to harmful levels of noise.
- 6.158 The Noise Impact Assessment prepared by Syntegra Consulting and accompanying this application sets out the assessment in detail.

Flood risk and drainage

- 6.159 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.
- 6.160 The site is within Flood Zone 1, deemed to be at low risk of flooding from all sources of flooding. It is not within a Critical Drainage Area (CDA). A Flood Risk Assessment is therefore not required.
- 6.161 A SuDs Strategy has however been prepared setting out the proposed sustainable urban drainage (SUDs) arrangements to manage surface water run-off and enhance biodiversity. A combination of substantial new planting, green roofs, a rainwater attenuation tank, and pervious paving are proposed. The preliminary hydraulic modelling by Eight Versa as contained in the SuDs Strategy demonstrates that the proposed SuDs components would be viable in order

to achieve the targeted discharge rates, whilst mitigating flood risk to the site and surrounding area. The attenuation storage tank located under the rear garden of the proposed building will for instance ensure a greater than 50% betterment against the pre-development run-off rates.

- 6.162 For further details please refer to the SuDs Strategy prepared by Eight Versa accompanying the application.

Ground conditions and contamination

- 6.163 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.
- 6.164 A Phase 1 Environmental Report has been prepared to assess the risks to sensitive receptors both on and off-site due to soil and groundwater contamination as a result of the proposed development.
- 6.165 Based upon the information available, the report concludes that in principle there appears to be no major contamination issues associated with the site. It sets out a series of recommendations and states that should these be implemented there is no risk to human health from the redevelopment of the site.
- 6.166 The report specifically refers to the potential contamination of the site from its use as a parking area and potential demolition debris within the made ground. It recommends that some preliminary intrusive environmental site investigation is undertaken to determine if contamination is present. It states that if significant organic containing material is identified within the made ground, then monitoring of potential ground gases, over a suitable period of time may be required in order to determine the requirement for gas mitigation measures.
- 6.167 The report recommends that the assessment is provided to the water supplier with a request for testing, if any, that they may require. It also states that should any olfactory evidence of contamination be noted during the works, this should be investigated by a suitably qualified person and their recommendations implemented. It goes on to state that if any contaminated spoil is to be removed from the site, the Waste Acceptance Criteria (WAC) testing should be agreed with the facility to which the spoil is being transported.
- 6.168 For full details of the Phase 1 assessment, please refer to the Phase 1 Environmental Report prepared by GO Contaminated Land Solutions accompanying the planning application.

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 a Brownfield site in an

established and accessible location 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.

