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Edmansons Close Planning Statement

Edmansons Close, Bruce Grove, Tottenham, N17 6XD

The Drapers' Almshouse Charity

16/09/2022

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Executive Summary

This Planning Statement has been prepared by Lichfields on behalf of The Drapers' Almshouse Charity (the client) to accompany an application for full planning permission and listed building consent at Edmansons Close, Bruce Grove, Tottenham, N17 6XD. The detailed description of development includes, "Demolition of existing laundry building and 1970s infill building; alterations and extensions to 44 existing almshouses to create 8 x 1 bed, 12 x 2 bed and 6 x 3 bed units; alterations to existing Gatehouse to provide 1 x 2 bed unit; construction of 1 x new build 3 bed almshouse to replace 1970s infill building; construction of a new apartment building comprising 7 x studio units and 9 x 1 bed units; construction of 4 x new build 2 bed units within two new pavilions (2 units in each pavilion, 4 units in total); with landscaping; improvements to access; car parking; and ancillary development thereto."

This proposed development has been progressed following extensive pre-application engagement with London borough of Haringey (LBH) since 2011, consideration at three Quality Reviews; and local engagement with the community and local councillors.

The site lies within a conservation area and partly within an Area of Archaeological Importance. The existing almshouses on site are all Grade II listed.

The requirement for changes to the site has arisen as the current accommodation does not meet modern day standards and resultantly a large proportion of the housing has become vacant over the years. The client wants to ensure that a long term and beneficial future is provided for the site and that it can be adapted to meet current day standards. As part of this, we are looking to sensitively adapt the almshouses to preserve the buildings and the site's setting, bringing the current sub-standard accommodation up to modern standards and back into beneficial use. This includes removing the unattractive later additions, (1970s infill block and laundry building); creating an attractive mix of housing on site, including housing for families, couples and individuals; designing the proposals to a high quality in terms of the architecture and sustainability; and sensitively adding new housing to make the proposals financially viable to deliver and hence ensure the long-term conservation of the listed almshouses. The 1970s infill block is in poor structural repair due to ground movements and inadequate foundations.

The application is accompanied by a number of technical reports, agreed with LBH officers, including key areas such as Heritage, Energy/ Sustainability, Ecology, Arboriculture, Transport, Archaeology, Fire, Noise, flood risk, Air Quality, land contamination, and daylight/ sunlight.

This Statement provides a detailed background to the proposals and sets out the relevant key planning policies. It analyses the proposals in the context of planning policy to show the proposals comply with policy and it sets out the number of planning benefits which the scheme will deliver.

The benefits arising from this planning application are central to its determination. In summary, these include:

- Providing sensitive restoration of existing almshouses to ensure they are fit for purpose and survive long into the future;
 - Providing a suitable mix of housing which caters for single people, couples and families in circumstances where London faces an acute shortage of homes of all types;
 - Providing accommodation of a better size standard from the existing stock and creating modern dwellings which meet national described standards and the London Mayor's space standards;
-

- Sensitive re-location of existing residents on site to modern, fit for purpose accommodation from their current, poor quality, cramped accommodation;
 - External enhancements to existing almshouses;
 - Biodiversity enhancements;
 - Amenity space enhancements;
 - Sustainability measures including sustainable design and construction, energy and water saving measures, waste reduction, photovoltaic panels, bio-diverse roofs, ASHPs etc;
 - Contribution to wider regeneration envisaged for the area through Tottenham Area Action Plan;
 - Local employment during the construction phase;
 - More efficient use of an existing brownfield site; and
 - High quality design which fully respects the listed buildings and conservation area setting.
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1.0

Introduction

- 1.1 This Planning Statement has been prepared by Lichfields on behalf of the Applicant, The Drapers' Almshouse Charity, to accompany an application for full planning and listed building consent at Edmansons Close, Bruce Grove ('the Site'). It seeks to assist the London Borough of Haringey (LBH) in their consideration of the application.
- 1.2 The Site is located on the east side of Bruce Grove, just south of its junction with Lordship Lane. Opposite the site, off the west side of Bruce Grove are Linley Road and Radley Road. Bruce Grove train station is located approx. 350m to the south east of the site. A small part of the north eastern section of the site is within an Archaeological Priority Area and the whole site is within the Bruce Castle Conservation Area. The existing almshouses are all Grade II listed, along with the Chapel and lodge to the south east of the Drapers' almshouses.
- 1.3 The proposed scheme would deliver 48 residential units providing housing to suit a range of needs including single occupants, couples and families.
- 1.4 The description of development is as follows:
- “Demolition of existing laundry building and 1970s infill building; alterations and extensions to 44 existing almshouses to create 8 x 1 bed, 12 x 2 bed and 6 x 3 bed units; alterations to existing Gatehouse to provide 1 x 2 bed unit; construction of 1 x new build 3 bed almshouse to replace 1970s infill building; construction of a new apartment building comprising 7 x studio units and 9 x 1 bed units ; construction of 4 x new build 2 bed units within two new pavilions (2 units in each pavilion, 4 units in total); with landscaping; improvements to access; car parking; and ancillary development thereto.”*
- 1.5 Prior to the submission of the planning application, the Applicant has engaged in detailed pre-application discussions with LBH and the Council's Quality Review Panel and has carried out public consultation with the local community. The proposed development has evolved in direct response to the ongoing engagement. It is the culmination and product of an extensive and inclusive pre-application design development process.
- 1.6 The purpose of this Planning Statement is to assess the proposed development against relevant planning policies in the Development Plan, having regard to other relevant material planning considerations. It demonstrates that the proposed development complies with national, strategic and local planning policies and guidance.

Scope of Application

- 1.7 This Planning Statement should be read in conjunction with the following accompanying application forms, plans, drawings and supporting documents/assessments, which have been prepared accordingly to assess the revised application:
- 1 Full Planning and listed building consent Application Form (PP-11534450);
 - 2 CIL Additional Information Form;
 - 3 Existing and proposed floorplans, elevations and sections, including Drawing Schedule, prepared by D+B Studios;
 - 4 Structural Survey by Price and Myers;

- 5 Design and Access Statement, including CGIs and verified views prepared by D+B Studios;
- 6 Site Waste Management Plan, included within DAS, prepared by D+B Studios;
- 7 Lighting Assessment details, included within DAS, prepared by D+B Studios;
- 8 Heritage Statement, prepared by Smith Jenkins;
- 9 Archaeological Desk Based Assessment, prepared by Mid Arch;
- 10 Draft HoTs (included within section 7 of this Planning Statement);
- 11 Daylight and Sunlight Assessment, prepared by Hodkinson Consultancy;
- 12 Air Quality Report, prepared by Hodkinson Consultancy;
- 13 Bat Survey Report and Update Site Walkover (August 2022), prepared by CSA;
- 14 Preliminary Ecological Appraisal prepared by CSA;
- 15 Arboricultural Assessment and Tree Survey, prepared by ACD Environmental;
- 16 Financial Viability Assessment, prepared by JLL
- 17 Transport Assessment, prepared by Motion Ltd;
- 18 Construction Logistics Plan, prepared by Motion Ltd;
- 19 Framework Travel Plan, prepared by Motion (included within Transport Assessment);
- 20 Delivery and Servicing Management Plan, prepared by Motion Ltd;
- 21 Energy Statement, prepared by Hodkinson Consultancy;
- 22 Sustainability Statement, prepared by Hodkinson Consultancy;
- 23 Overheating Assessment, prepared by Hodkinson Consultancy;
- 24 Phase 1 Land contamination desk study, prepared by Geosmart;
- 25 Acoustic Report, prepared by Hodkinson Consultancy;
- 26 Statement of Community Involvement, prepared by Green Brain;
- 27 Fire Strategy, prepared by Tetrattech;
- 28 Flood Report, prepared by Geosmart; and
- 29 SuDs Report, prepared by Geosmart.

- 1.8 The scope of the application has been agreed with LB Haringey officers as part of the pre-application consultation process and fully accords with LB Haringey's local validation requirements.

Structure of Planning Statement

- 1.9 This Planning Statement comprises the following subsequent sections:
- Section 2.0 provides a description of the Site and its surroundings;
 - Section 3.0 provides an overview of the Planning history and pre-application consultation process;
 - Section 4.0 describes the proposed development;
 - Section 5.0 summarises the relevant planning policy and guidance;
 - Section 6.0 contains a comprehensive assessment of the proposed development in planning terms and sets out the Planning Benefits;

- Section 7.0 sets out the estimated CIL and draft S106 Heads of Terms; and
- Section 8.0 sets out the conclusions

2.0 **Site Description and Surroundings**

- 2.1 This Section of the Statement provides a description of the Site and its surrounding area. It helps provide an understanding of the site's setting and its relationship with neighbouring land uses.

Site Description

- 2.2 The Site is located on the east side of Bruce Grove, just south of its junction with Lordship Lane. Opposite the site, off the west side of Bruce Grove are Linley Road and Radley Road. Bruce Grove train station is located approx. 350m to the south east of the site. The site currently comprises C3 residential units which are broken down as follows:
- 48 studios
 - 1 x 1 bed unit
 - 12 x two-bedroom units
 - A chapel
 - Prefabricated Laundry Building
- 2.3 The majority of accommodation is set around a front green which provides open views towards Bruce Grove. The almshouses have been occupied since 1869 at which time they were designed to provide housing for married couples. Many of the almshouses were refurbished in the 1930s and a number of repairs were undertaken following the second world war. Since this time there have been a number of adaptations and changes to the site. The current almshouses are very small and fall short of current day standards of living.
- 2.4 The whole of the application site lies within the Bruce Castle Conservation Area and a small part of the north eastern section of the site is within an Archaeological Priority Area. The existing almshouses are all Grade II listed.
- 2.5 The site benefits from a PTAL rating of 5. Car parking on site is currently informal, with residents parking around the front green, but with no formal marked out car spaces.
- 2.6 Much of the current accommodation on site has become vacant due to the fact that it is not fit for purpose – the units are cramped and poorly laid out. They do not meet statutory size standards.

Surroundings

- 2.7 To the rear of the site, to the east, lies the former Magistrate's Court. The predominant land use surrounding the site however is residential, with mainly terraced Victorian and Edwardian two and three storey houses.
- 2.8 To the east of the site lies the boundary of the Tottenham Area Action Plan. This spans north to south from approximately White Hart Lane to Seven Sisters. The boundary extends as far east to include Tottenham Hale and Northumberland Park. The Council's vision is for this area, close to the boundary of Edmansons Close, is to be the next great area of London. It aims to build on its geographical, natural and cultural strengths and capitalise on the dynamics of neighbourhood improvement, the significant infrastructure investments being delivered in the area and the availability of large development sites. It is intended that the combination of transformative actions and continuous incremental improvement will

unlock Tottenham's potential as an increasingly attractive place to live, work, study and visit, a neighbourhood fully benefitting from London's growth and its position in a world city.

- 2.9 There are a number of amenities located to the immediate south of the site along Bruce Grove, which form part of the local district shopping centre. Further north there are further amenities located within a short walk, along Lordship Lane.

3.0

Planning History and Pre-Application Consultation Process

3.1

This Section of the Statement provides an overview of the site's key planning history records and explains the extensive pre-application consultation process which has been undertaken ahead of the application submission. The proposed scheme has been the subject of extensive consultation since 2011. This has included a number of pre-application meetings with LB Haringey Officers, focused meetings with Officers on Design and Heritage, three Quality Review Panel meetings and consultation with existing residents and the local community.

Planning History

3.2

The planning history of the site is primarily associated with a number of alterations, divisions and refurbishments to the almshouses since their construction in 1868-69.

3.3

Most recently, listed building consent was granted in 2016 to amalgamate the 61 existing almshouses into 23 two bed houses and eight studios, in order to restore the properties into larger homes which are 'fit for purpose' in terms of modern living standards (application reference HGY/2016/2725). This proposal related to internal changes only to help deliver much needed housing while retaining the status of the listed buildings, which were increasingly being vacated by residents as a result of cramped conditions.

3.4

The listed building consent has never been implemented as it is financially unviable. The current application seeks to overcome this by adding new accommodation.

3.5

A record of the planning history for the site – as listed on the Council's planning register – is provided in Table 3.1 below.

Table 3.1 Planning history of the site

Address	Reference	Type	Description	Decision Date	Decision
Edmansons Close Almshouses Bruce Grove London N17	HGY/1995/0569	Listed Building Consent	Rebuild "out of plumb" gable end chimney stacks to Blocks 2 & 5. Re-roof Blocks 2 and 5. Repairs and decoration works.	22/08/1995	Grant
Flat 31 Edmansons Close London N17	HGY/1997/1234	Full Planning Permission	Provision of grab handles (pressalit rails), 1 No at back entrance and 3 No at main/front entrance to flat.	10/11/1997	Withdrawn
Flat 31 Edmansons Close London N17	HGY/1997/1238	Conservation Area Consent	No Listed Building Consent for minor adoption necessary to enable elderly occupants to gain safe access by the provision of 4 pressalit grab rails, 3 to front entrance and 1 to the rear	10/11/1997	Withdrawn

Address	Reference	Type	Description	Decision Date	Decision
Edmansons Close Almshouses Bruce Grove London N17	HGY/1999/1255	Listed Building Consent	Listed Building Consent for recovering of roof with slate to Nos. 27 - 37 and chapel plus weatherings	21/03/2000	Grant
1-26 Edmansons Close Bruce Grove London N17 1NE	HGY/2001/1371	Listed Building Consent	Listed Building Consent for the replacement of existing roofs.	08/11/2001	Grant
1-60 Edmansons Close Bruce Grove London N17 6XD	HGY/2011/1200	Full Planning Permission	Upgrading of communal television aerials (householder application)	11/08/2011	Withdrawn
1-60 Edmansons Close Bruce Grove London N17 6XD	HGY/2011/1201	Listed Building Consent	Listed building consent for upgrading of communal television aerials	11/08/2011	Withdrawn
1-60 Edmansons Close Bruce Grove London N17 6XD	HGY/2012/0790	Full Planning Permission	Upgrading of communal television aerials.	06/06/2012	Refused
1-60 Edmansons Close Bruce Grove London N17 6XD	HGY/2012/0791	Listed Building Consent	Listed Building Consent for upgrading of communal television aerials.	06/06/2012	Refused
Drapers Almshouses, Edmansons Close Bruce Grove London N17 6XD	HGY/2016/2726	Certificate Of Lawfulness (Proposed)	Certificate of lawfulness for amalgamation of the existing almshouses to create larger, fit-for-purpose dwellings, resulting in a reduction in the number of units from 50 studios, 2 x 1-bed units and 9 x 2-bed units to 23 x 2 bed units and 8 studios.	06/10/2016	Permission Required
Drapers Almshouses, Edmansons Close Bruce Grove London N17 6XD	HGY/2016/2725	Listed Building Consent	Listed building consent for internal alterations and amalgamations to create larger dwellings. Proposals involve a reduction in units from 50 studios, 2 x 1 bed flats and 9 x 2 bed flats to 23 x 2 bed houses and 8 studios.	06/10/2016	Grant

Source: Haringey London Borough Council (HLBC) planning application register

Pre-Application Consultation

- 3.6 The first pre-application meeting was held on 13th May 2011. Six pre-application meetings were held between this time and 2019.
- 3.7 A summary of the key feedback received during this time is included in the Table 3.2 below.

Table 3.2 Feedback by topic at each pre-application meeting

	2011 (May)	2011 (October)	2015 (Sept)	2017 (November)	2019 (July)	2019 (September)	2020 (January)	2020 (May)	2020 (Sept)
Scheme Evolution	Extension and refurbishment of existing almshouses New building of 30 units 1 potential new 9 unit building 12 new mews houses on front lawn	Included same principles as May but with further design development	24 family houses, 2 of which are new build in corners of the building 2 flats in the chapel 8 studios in ancillary outbuilding 1 house in Gatehouse	Gatehouse to be 1 house 2 new 2 storey apartment buildings at corner plots replacement of 1970s infill with 2 houses 4 new houses in rear area	22 family houses 6 new build family houses 4 new build apartments 1 house within gatehouse Chapel to remain as community resource	Followed up with further design detail to July 2019 and considered different options for apartment building location at south of site	Gatehouse back into 1 house 2 storey apartment buildings proposed at the corner plots Replace 1970's infill with three smaller 2 bed mews houses New apartment building (12 x 1 bed flats)		Detailed heritage background and evolution provided for discussion
TOPIC	KEY FEEDBACK RECEIVED AT EACH PRE-APP MEETING BY TOPIC AREA								
Changes to existing almshouses	Vital to retain the external elevations Any rear extension to be architecturally harmonious & subordinate to existing architectural form with matching slated roof and compatible facing materials Proposed rear extensions seen as promising, however architectural form should be simple, modest and of consistent architecture	Extensions to rear of existing almshouses acceptable	Amalgamation of residential units would result in loss of residential units and therefore planning permission is required (seen as material change in circumstances) Principle of extensions and alterations are acceptable in principle subject to scale, bulk, height and massing and use of materials. "whilst this would have some impact on the original fabric of the terrace, this would	Officers questioned the depth of the rear extension including the position of the ridge to be lower down the slope of the main building	Best to retain facades, plan forms and longitudinal elements Reconfiguration of internal areas acceptable. Important to retain rear gardens of almshouses Unhappy with removal of rear lean to extensions and suggested extending the existing original extension upwards	Rear extensions-commend work done to date and support their design and appearance but query whether sufficient head height can be provided.		important to show the proportional relationship between the buildings, including cross sections and 2D drawings	Welcomed bin store proposals in front porch area, but there remained the detailed design issue of rainwater pipes; that officers feel it would be desirable to revert back to downpipes between each 1st floor semi-dormer window, rather than the post-70s renovation solution of having gutters running across the front of those windows.

	2011 (May)	2011 (October)	2015 (Sept)	2017 (November)	2019 (July)	2019 (September)	2020 (January)	2020 (May)	2020 (Sept)
			be necessary to achieve a sustainable future for the terrace and would generate significant heritage benefit to offset the limited harm". Replacement of single storey extensions with 2 storey outrigger extensions would generate significant heritage benefit to offset limited harm proposed						noted that the interiors could benefit from a less historical approach as there are no original features left. valued the design solution and stated that it looked appropriate and graceful as it had a purpose for being there. She confirmed that she was happy with the design of the extensions. need to define the rear gardens to the almshouses.
Corner infills to almshouses (known most recently as the Pavilions)	Proposed infill mews houses in each corner were deemed acceptable in principle but should follow same proviso for rear extensions	Infill houses should be a 'scholarly reproduction' – replica, not a pastiche	Prefer that corner gaps are not infilled Rectilinear formation of terraces is an important aspect of the group. Infill of these gaps could lead to loss of current distinction of 3 separate terraces. Scheme in current form is unacceptable Should corner infills be pursued, they should be set	2 Infill corner blocks should be more contemporary	Corner infill units should be pulled back further Consider corner infills as houses instead of apartments	Need further convincing on corner infills (new pavilions)		These work but there could be different opportunities to address these Have more freedom in design composition as new insertions	understood the composition approach to these

	2011 (May)	2011 (October)	2015 (Sept)	2017 (November)	2019 (July)	2019 (September)	2020 (January)	2020 (May)	2020 (Sept)
			in from either side of the terraces and appear discrete. A modern design taking cues from materiality and context detailing may be more appropriate						
1970s infill building	Not confident anything could be accommodated at the front of the site which is taller Proposed 1970s infill block could not be supported as taller than existing properties	New Apartment block (1970s infill replacement) acceptable in principle. Second section to rear less acceptable. Scope to increase height of building in places	Existing 1970s infill considered acceptable to erect another infill extension in principle	1970s Infill section requires strong case as seen as demolition of listed building	Option to replace the 1970s infill considered acceptable providing the units take character, geometry, height and form into consideration.			Still not convinced flat roof design of 70s infill is appropriate. Suggested removal of 1 mews from the 70s infill. Currently convoluted route and narrow passageway to/ from this.	welcomed as animating the approach to the block behind, which is now to be through the remaining gap between the almshouses and gatehouse.
Additional development to south of almshouses	Proposed block in place of Nurses home – limited options for enlarged mass but could replace with new building if retains domestic smaller scale								
Additional mews development to south of almshouses (later to become proposed)				Proposed dwellings could be back to back rather than back to front	Uncertain if communal garden space would work for back to back mews houses Prefer if mews houses were not semi detached	whilst this area is suitable for re-development, further design and layout options need to be investigated.	confirmed that the recent design work is really positive and highlighted that the apartment block will help as natural surveillance for	Convoluted Access; access not obvious Elderly building still does not work Apartment building will cause light spill	preference would be that it be no more than 2 storeys, and suggested a significantly set-back 3rd storey would be preferable to

	2011 (May)	2011 (October)	2015 (Sept)	2017 (November)	2019 (July)	2019 (September)	2020 (January)	2020 (May)	2020 (Sept)
apartment building)					New mews could be realigned to move closer to allotment area and look at different angles Mews houses could be made 2 bed to provide variety to mix Should re-consider front and rear paths to new mews units Further consideration required on the alignment of the new mews proposed in the south east of the site		the playspace area.		officers than the proposal shown, of a 3rd storey of substantially the same footprint as the two lower floors Need to develop clearer design of public and private amenity space around elderly block.
Setting	Setting to the lawn is crucial throughout scheme development Proposed additional mews houses on lawn at front are unacceptable as would detract from existing positive contribution almshouses make								
General design	All new development should retain 2			Opening up works suggested to explore if any	Option 4 of pre-application document)		important to show the proportional relationship	Useful design 'exploration' and we have taken on	Playspace preferred to be located on the

	2011 (May)	2011 (October)	2015 (Sept)	2017 (November)	2019 (July)	2019 (September)	2020 (January)	2020 (May)	2020 (Sept)
	storey scale in line with the surrounding buildings			features can be retained	considered to be best, most respectful option		between the buildings, including cross sections and 2D drawings important to show the proportional relationship between the buildings, including cross sections and 2D drawings	board Quality Review Panel (QRP) advice. Rationale is more joined up. Approach is 'coming together'. Need whole site to function together. Balustrading/ window detailing is not convincing across the site. Looks like balustrades wouldn't stand up and that windows couldn't open.	quadrangle to Edmanson's Close. Equipment which blends with landscape is preferred over bright coloured metal play equipment. Need to show more context – better understanding of relationships of buildings with their neighbours. Show all buildings together rather than individual ones.
Transport	Car Parking too close to boundary of residents to the rear and quantity should be reduced	Transport officer recommends removal of proposed parking from green area and that informal arrangement around green is acceptable	Car Parking provision could be reduced to avoid losing slither of green space Car parking needs to avoid harm to green and setting of listed buildings	Car parking should be informal rather than encroaching on green space	Noted there is ability to park within the site at present. This should be detailed/confirmed including provision of blue badge bays and any other parking proposed, including the means of allocation. A scaled drawing should be provided to detail the location and size of any spaces.	Need to formalise parking arrangements	Generally, car parking will be required for family units		

	2011 (May)	2011 (October)	2015 (Sept)	2017 (November)	2019 (July)	2019 (September)	2020 (January)	2020 (May)	2020 (Sept)
					Edmansons Close is not public highway. Ideally the development should meet its parking demands within curtilage, however the provision of high quality cycle parking, car club facilities and a permit free development will reduce demand to own a car.				
Other	Need to understand financial context to proposals (more money = more affordable housing) Consultation is key	Accepted C3 use remains same	50% affordable housing sought Family sized units (3 bed) likely to be justifiable and supported by officers, despite not providing policy compliant mi			Too many 2 bed units – need improved housing mix	concern over the loss of ‘elderly’ housing and the lack of affordable housing.		Noted that the toilet facilities in the chapel will be required to be accessible and therefore a small separate extension may be required to accommodate this. agreed that the proposals for the chapel as a community use were very welcome. Drawings need to show wider context

Source: Lichfields analysis

- 3.8 In addition to the above summarised pre-application meetings, we have also had a number of focused MS Teams Calls with Officers to prepare the scheme for consideration at Quality Review Panel (QRP) and to work up changes following QRP. A summary of the QRP meetings is set out below.

Quality Review Panel 1 (4th March 2020)

- 3.9 The scheme presented to the first QRP included:

- 1 22 no. 3 bed family houses (refurbished and extended almshouses) – modern box type extensions to rear with glass link
- 2 3 no. new build 2 bed family mews houses (to replace 1970's infill)
- 3 12 no. new build one bed apartments (on site of Laundry Building)
- 4 4 no. new build two bed apartments
- 5 1 no. 2 bed family house within the gatehouse
- 6 Retention of the chapel as a community resource

Total: 42 dwellings

- 3.10 A summary of the feedback was:

- 1 LBH recognises that something needs to happen to improve the site but they are not sure if the right solution has been put forward yet;
- 2 some concern regarding lack of affordable housing;
- 3 supportive of the principle to improve the existing accommodation and make better use of the site to provide further accommodation mix;
- 4 recognised the current accommodation needs to be brought up to modern day standards;
- 5 the locations for the new development were all deemed acceptable and the general height and scale confirmed to be appropriate;
- 6 queried evolution of designs and stated a summary of the previous designs considered and why these were discounted needs to be provided;
- 7 noted that removal of existing drainpipes to front of almshouses was positive and would help to tidy up the fronts of these buildings;
- 8 hit and miss brickwork - troubled by this approach. Suggested something a bit more utilitarian with a 'quieter approach' to the brickwork. Hit and miss brickwork could however still be acceptable for the stand alone apartment building and there is potential to use hit and miss brick work in part to create legibility of entrances etc;
- 9 almshouse rear extensions sit uncomfortably with existing roof line – sit too tall;
- 10 almshouse rear extensions – alternative brick design which offered a replication of the existing brickwork was viewed more favourably;
- 11 is potential to push the rear extensions further away from the existing dwellings;

- 12 is potential to provide larger ground floor area to almshouses with smaller upper floors – this could help improve storage opportunities at ground floor;
- 13 glass links – concerns how these would be maintained/ kept clean;
- 14 legibility needs improving - being able to clearly find your front door (placemaking is important). Can use architectural devices to clearly define front doors;
- 15 landlocked buildings (i.e. apartment building and pavilions not responding well to context) – need to be found more easily;
- 16 need a clear movement strategy around the site;
- 17 need to give more thought to storage capacity for families (prams etc);
- 18 bin storage needs to be given more consideration – not convinced separate external bin areas are big enough and could look untidy;
- 19 further detail required to show how cycle parking will be accommodated and demarcation of car parking spaces (there is a tight plan form for bikes);
- 20 playspace – should not just be for children but for the elderly – croquet, games provision etc. Should also look at opportunities for doorstep informal play;
- 21 LBH conservation should not be too strict on retaining the green to the front of the almshouses in its current form. It presents an opportunity for improvement and could even have railings around this to create a new square – also opportunities for more biodiversity here;
- 22 1970s infill replacement building sits uncomfortably in views - it should have front doors onto the street and not be hidden behind a wall;
- 23 need to update tree survey and accurately show the trees on drawings. Concerns regarding root protection areas and whether the north eastern pavilion may need moving or reducing in scale accordingly;
- 24 Look at potential for boundary screening from existing flats along NE boundary;
- 25 do not favour sedum roofs – more biodiverse type roofs encouraged;
- 26 need more narrative to demonstrate how the site needs to change and what it's turning into, emphasising positive change;
- 27 recommended another QRP to address issues raised.

3.11 Following the QRP on 4th March, a follow up meeting was held with LBH as LBH did not agree with all the comments raised by the Panel. Further revisions were agreed with LBH prior to revisions being submitted for a Chair Review.

Quality Review Panel, Chair Review 1 (16th December 2020)

3.12 The scheme presented to the Chair Review included:

- 1 22 no. 3 bed family houses (refurbished and extended almshouses)
- 2 16 no. new build one bed elderly apartments (on site of Laundry Building)
- 3 4 no. new build two bed apartments (the pavilions)

- 4 1 no. new 3 bed almshouse (replacement to 70s infill)
- 5 1 no. 2 bed refurbished gatehouse
- 6 The chapel will remain as a community resource and provide mini heritage museum

Total: 44 dwellings

3.13 The main changes to the revised scheme included:

- 1 simplification of the interiors to the almshouses;
- 2 changes to roof form on almshouse extensions with more views provided;
- 3 limitation of hit and miss brickwork to areas requiring privacy only;
- 4 apartment building scaled back to step down towards adjacent almshouse extensions;
- 5 clarification of public and private amenity space around apartment building;
- 6 Tree survey was updated;
- 7 Legibility increased to provide clearer wayfinding across the site;
- 8 Natural play area introduced to quadrangle;
- 9 Improvements to enable refuse vehicles to pass parked cars;
- 10 Heritage work updated to provide comprehensive Heritage Statement and further detail on previous design iterations worked up.

3.14 A summary of the feedback was:

- 1 broadly support the scale of the proposals, the refurbishment of the chapel, the extension of the almshouses and the adjustments to the infill building on Bruce Grove.
- 2 However, some important aspects of the scheme have scope for improvement. These include the site-wide strategy for amenity space, the pedestrian routes and the detailed design of the communal gardens and play areas, the provision of storage within the almshouses, and the configuration and architectural expression of the new apartment block located at the east of the site.

Quality Review Panel, chair review 2 (15th June 2022)

3.15 The scheme presented to the Chair Review included:

- 1 26 no. family houses (refurbished and extended almshouses)
- 2 16 no. new build studios and one bed elderly apartments (on site of Laundry Building)
- 3 4 no. new build two bed apartments (the pavilions)
- 4 no. new 3 bed almshouse (replacement of 70's infill)
- 5 no. 2 bed refurbished gatehouse
- 6 Retention of the chapel

Total: 48 dwellings

3.16 The main changes to the revised scheme included:

- 1 improved configurations to the apartment building and its design detailing;
- 2 Changes to materiality, removing hit and miss brickwork;
- 3 Focus on more sensitive restoration of the almshouses with more traditional adaptations and extensions;
- 4 Further improvements to legibility and access;
- 5 Improvements to the green;
- 6 Development of key views;
- 7 New almshouse to turn the corner and end range in replace of 1970s infill building.

3.17 A summary of the feedback was:

- 1 It will be an important development for the borough;
- 2 the proposals are moving forward well, and represent a substantial amount of work by the client and project team;
- 3 The panel is warmly supportive of the scheme, and of the way that the project team have responded to feedback from the two previous reviews;
- 4 The Panel supports the scale of the proposals, the refurbishment of the chapel, the extension of the almshouses and the adjustments to the infill building on Bruce Grove;
- 5 However, there are still some aspects of the proposals that would benefit from some further consideration. These include the arrangements for cycle parking, the entrance sequences, and circulation layout within the new-build elements. The scheme would also benefit from a greater level of articulation and detail within the elevations of the new buildings, and from further clarity and control of the landscaped area in front of the new apartment building;
- 6 The design team will need to negotiate a careful balance between heritage requirements and energy efficient design. This should be undertaken in cooperation with Haringey officers. The panel would also welcome greater clarity of intention within the drawings in terms of the technical design of the development, which should include showing elements like air source heat pumps and photovoltaic panels within the drawings. The panel also highlights the importance of producing additional three dimensional (CGI) images to show the detail of all of the new-build elements, and the relationships between the new buildings and the existing buildings.
- 7 The Panel concluded that it is delighted with the way that the scheme has progressed, and it looks forward to seeing the proposals come to fruition. Some comments on the details of the scheme remain, but the panel feels that these can be addressed in consultation with officers.

Community Consultation

Consultation with on-site residents

3.18 A briefing with 14 of the 17 existing residents was held on site on Monday 4th July 2022. The remaining three were invited but unable to attend.

- 3.19 Feedback was very positive and residents stated they were very happy with the proposals. They stated that they believed their interests were being properly considered and that they were happy with the level of consultation.

Wider community consultation

- 3.20 On Wednesday 6th July 2022, 200 newsletters were hand-delivered to the streets surrounding the Edmansons Close site and residents on-site. This included an invitation to a public exhibition and website details on the scheme.
- 3.21 On Thursday 7th July, individual invitations, in the form of the newsletter and a personalised covering letter, were also sent to local ward councillors, Officers at the Council, the Planning Chair, Leader of the Council and some local interest groups. Full details are provided within the SCI prepared by Green Brain.
- 3.22 A Public Exhibition was held in the Edmansons Close Chapel on Thursday 14th July from 4pm–7.30pm and on Saturday 16th July, 11am–2.30pm.
- 3.23 Thursday's session had 5 attendees. This included 3 current residents, 1 with her daughter, and 1 local resident from Elsdon Road to the rear of the site. The existing residents all confirmed they were happy with the proposals and have completed positive feedback forms. The daughter confirmed that her mother was very pleased with the proposals and the positive manner in which the Drapers and the professional team were considering their needs.
- 3.24 The resident from Elsdon Road resident expressed they were relieved that the scheme was modest in scale and did not involve high-rise flats.
- 3.25 Saturday's session had 1 first-time visitor, with a few of the current residents who had visited on Thursday making a return visit. The new visitor was a member of the Tottenham Conservation Areas Advisory Committee. She was very interested and left very positive feedback. She took information away to share with other committee members and the Tottenham Society.
- 3.26 From the public exhibition, four hard copy responses were also filled out which noted strong support that the almshouses are going to get a much needed revamp, relief that the almshouses are to be retained and modernised for new people to move into, and appreciation that a larger home in the new block is to be provided (specifically from one of the existing residents).

4.0 Proposed Development

- 4.1 This section of the Statement provides a summary of the proposed scheme. Full details of the proposed scheme are set out in the accompanying Design and Access Statement, prepared by D+B Studios.

Description of Proposed Development

- 4.2 The proposed scheme seeks to sensitively adapt and extend the existing almshouses to preserve the buildings and the site setting. The current housing is all private with no planning restrictions. It proposes to bring the current sub-standard accommodation up to modern standards and back into beneficial use. This includes removing the unattractive later additions, including the 1970s infill block and laundry building, and adding some new build units to the site to boost the variety of housing offered and ensure a viable development can be brought forward.

- 4.3 The specific proposals include,

“Demolition of existing laundry building and 1970s infill building; alterations and extensions to 44 existing almshouses to create 8 x 1 bed, 12 x 2 bed and 6 x 3 bed units; alterations to existing Gatehouse to provide 1 x 2 bed unit; construction of 1 x new build 3 bed almshouse to replace 1970s infill building; construction of a new apartment building comprising 7 x studio units and 9 x 1 bed units; construction of 4 x new build 2 bed units within two new pavilions (2 units in each pavilion, 4 units in total); with landscaping; improvements to access; car parking; and ancillary development thereto.”

Layout, Scale, Design and Appearance

- 4.4 Of the 44 original almshouses, 8 are returned to their original layout, 24 are reworked to create 12 two bed houses with each combining two of the original almshouses, and 12 are reworked to create 6 three bed houses with each combining two of the original almshouses and adding modest rear two storey extensions.
- 4.5 Alterations to the existing Gatehouse, which has previously been split into two flats include restoring it to a single dwelling in line with its original design. The building will have new French doors to the rear.
- 4.6 The new three bed almshouse to replace the 1970's infill building will complement the existing almshouses in form and materials albeit with contemporary detailing. The new almshouse is detached from the historic buildings either side and forms a subservient design. Its proportions and rhythm tie in with the neighbouring historic buildings. It provides a turning point into the new access to the apartment building and ends the 'range' of almshouses along this side. Chimney stacks are the same proportion as the almshouses with banding to complement that of the more decorative almshouse.
- 4.7 The proposed apartment building which is to contain 16 units (7 x studio and 9 x 1bed units) extends to a maximum of 3 storeys (ground + 2 upper floors). It steps down to be only 2 storeys towards the existing almshouses. The apartment building proposes similar proportioned windows to the almshouses, will complement the existing brick style on site with use of London stock brick and includes a brick banding detail inspired by the

almshouses. The apartment block has been positioned and designed so that it cannot be seen from the green area in front of the almshouses, but the entrance to the block can be seen when approached from Bruce Grove.

- 4.8 The two pavilions form a knuckle in the site layout and are simple in design. They are set back from the main Bruce Grove elevation where the front green and almshouses are viewed and form subservient additions. The simple head jointed brick banding takes precedent from the brick banding of the almshouses. The buildings have been designed to embrace the landscape and provide good sized accommodation within a surplus space, currently underused. The architecture is modest and will be in a reclaimed brick to match the historic buildings with generous inset balconies.

Residential Quantum and Mix

- 4.9 The proposed scheme will provide 48 no. residential units, comprising one, two and three-bedroom units.

Existing

The existing mix on site includes:

- 48 studios
- 1 x 1 bed unit
- 12 x two-bedroom units
- A chapel
- Pre fabricated laundry building

Proposed

The proposed mix includes:

- 7 studios
- 17 one-bedroom units
- 17 two-bedroom units
- 7 three-bedroom units
- A chapel
- A pre-fab laundry building

All of the proposed units will be private. The scheme is unable to support provision of any affordable housing as outlined in the Financial Viability Assessment prepared by JLL.

Access, Servicing and Parking

- 4.10 Vehicle access to the site is provided via the existing entrance, to the north end of the site, from Bruce Grove. Traffic will travel in a clockwise direction around the green exiting the site to the south end, fronting Bruce Grove. This is as per the existing arrangement. There is an additional existing vehicle gate further south. This also fronts Bruce Grove and is to be used by emergency vehicles and for refuse collection. The road around the Green is to be widened to enable

adequate space and safe movement for refuse and emergency vehicles. Residential access is provided via the same gates.

- 4.11 Car parking is proposed around the green area and to the front of properties facing Bruce Grove with 30 marked spaces – see proposed ground floor plan. The current arrangement is informal with car parking for circa 40 cars. The London Plan standard of 3% disabled badge spaces has been applied with a further 7% shown to be capable of being provided, if required. All car parking demand is assumed to be provided on-site. EV spaces will be provided according to demand at least at 20% provision. Car club membership will be provided. There is an existing car club space near the site in Lordsmead Road operated by Zipcar.
- 4.12 Secure cycle sheds will be provided in each of the gardens for the almshouses; 1 space per one bed units and 2 for two bed units. The apartment building has its own secure cycle store and the new almshouse and pavilions also have a bike store to the rear gardens. In total, 72 cycle spaces will be provided with 8 cycle spaces for visitors.

Landscaping, Amenity and Playspace

- 4.13 Detailed landscaping proposals have been drawn up by BD Landscapes. Full details of the proposals are included within the Design and Access Statement. The proposals clearly show the public and private realms between the rear of the almshouses and the new apartments, with clear gardens to the almshouses, a separating path leading to the drainage pond and private gardens to the ground floor apartments. All the houses are provided with private gardens, all ground floor apartments benefit from private gardens and upper floors flats have balconies. All properties have the benefit of access to the landscaped areas across the wider site.
- 4.14 The front green space onto Bruce Grove will be retained as a significant part of the setting of the Grade II listed almshouses. However, the nature of the space is proposed to change to secure improvement and reflect the needs of all residents.
- 4.15 The proposals are to make the space more appropriate for families, the elderly and young with a private communal garden for all residents and a defined child play space as well as family boules and games area with seating.

Energy and Sustainability

- 4.16 The proposed Energy and Sustainability Strategy has been developed giving equal consideration for both refurbished and new dwellings. The combination of Be Lean and Be Green measures results in a 71% reduction over the Part L 2013 baseline for new build development. This is a 45-50% reduction in carbon dioxide emissions over Part L 2021. A 25.2% reduction over this baseline is expected for the refurbished development. The remaining carbon dioxide emissions will be offset through a payment estimated at 6.1 tonnes per annum. This equates to a payment of £17,385.
- 4.17 The proposed scheme incorporates a number of sustainable design and construction measures. These include draught proofing, photovoltaic panels, bio-diverse roofs, ASHPs etc.

5.0 **Planning Policy Context**

- 5.1 This section of the Planning Statement details the policy context for the application, describing the Development Plan policies of relevance to the consideration of the proposed development, as well as providing an account of the prevailing policy guidance in the National Planning Policy Framework ('NPPF') and other documents that represent appropriate material considerations. In doing so, it identifies the key planning considerations against which the planning application will be assessed in the next section.

National Planning Policy

- 5.2 The NPPF (July 2021) sets out national planning policy and is a material consideration in determining planning applications. It is supplemented by National Planning Practice Guidance (PPG) which gives further guidance on how policies contained within the NPPF should be interpreted.

Sustainable Development and Decision Making

- 5.3 The aim of the NPPF is to proactively deliver sustainable development to support the Government's housing and economic growth objectives and meet the needs of the country. Paragraph 8 sets out the three dimensions of sustainable development:

- Economic: to "help build a strong, responsive and competitive economy"
- Social: to "support strong communities and ensuring that a sufficient number and range of homes to meet the needs of present and future generations"
- Environmental: to "protect and enhance our natural, built and historic environment".

- 5.4 To achieve this, Paragraph 11 goes on to state that, for decision-taking, the application of a presumption in favour of sustainable development means:

"c) Approving development proposals that accord with an up-to-date development plan without delay; or

d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

i) The application of policies in [the NPPF] that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or

ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in [the NPPF] taken as a whole."

- 5.5 Local planning authorities ('LPAs') should approach decisions in a positive and creative way, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area (Paragraph 38).

Historic Environment

- 5.6 Chapter 16 of the NPPF – titled 'Conserving and enhancing the historic environment' – sets out the Government's policies regarding planning and the historic environment. It requires applicants to provide a description of the significance of any heritage assets affected, with

the level of detail proportionate to the assets' importance and no more than is sufficient to understand the potential effect of the proposal on their significance (Paragraph 194).

5.7 LPAs should then identify and assess the particular significance of heritage assets that may be affected by proposals, taking into account the assessment when considering the impact of a proposal so as to avoid or minimise any conflict between the heritage asset's conservation and the proposal (Paragraph 195).

5.8 Paragraph 197 further states that LPAs should take account of:

- the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
- the desirability of new development making a positive contribution to local character and distinctiveness.

5.9 When considering the impact of proposals on the significance of designated heritage assets, the NPPF also encourages LPAs to look for opportunities for new development within conservation areas and the setting of heritage assets, to enhance or better reveal their significance (Paragraph 206). Proposals that preserve those elements of the setting that make a positive contribution to – or better reveal the significance of – a heritage asset should be treated favourably.

Other NPPF Policies

The NPPF contains further policies of relevance to considering this planning application, which include (amongst other things):

- **Housing delivery** (Chapter 5) and the critical importance of delivering homes to meet housing needs and maintain a five-year supply of housing against housing requirements.
- **Healthy communities** and the importance of achieving healthy, inclusive and safe places, which enable healthy lifestyles.
- **Sustainable transport** (Chapter 9) and the objective of focusing development in locations which are sustainable, through limiting the need to travel and offering a choice of sustainable transport modes (e.g. walking, cycling and public transport use).
- **Good design** and ensuring that developments are high quality, visually attractive, sympathetic to the surrounding area, and create safe and inclusive places with a high standard of amenity for existing and future users.

The Statutory Development Plan

5.10 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires the determination of planning applications to be made in accordance with the relevant Development Plan, unless material considerations indicate otherwise.

5.11 The relevant Development Plan for the site currently comprises:

- The London Plan (2021)

- LB Haringey's Local Plan: Strategic Policies (2013, with alterations 2017)
- LB Haringey's Local Plan: Development Management DPD (2017)
- The following provides a summary of key relevant policies. A full policy matrix can be found at **Error! Reference source not found.**

London Plan (2021)

- 5.12 The new London Plan (adopted March 2021) comprises the strategic component of the development plan and provides the spatial development strategy for Greater London. It sets out an integrated economic, environmental, transport and social framework for the sustainable development of London over the next 20-25 years.
- 5.13 The London Plan places a firm emphasis on 'planning for good growth' by making the best use of land, maximising housing delivery and employment opportunities, while creating a healthy city and increasing the efficiency and resilience of the built environment.
- 5.14 The following summarises key London Plan policies that are of relevance to the site. As stated a full policy matrix is contained within **Error! Reference source not found.**
- 1 London's overall housing delivery target has been elevated to approximately 52,000 homes per year, of which 1,592 new homes are required in Haringey (Policy H1, Table 4.1). To achieve this target, London Boroughs should encourage development on appropriate windfall sites and optimise the potential for housing on brownfield sites, particularly in areas highly accessible by public transport and on smaller sites.
 - 2 The site is located within the Crossrail 2 North Growth Area which has a total potential capacity to deliver an additional 28,000 homes and 18,500 jobs from 2019-2041 across Lee Valley, New Southgate and Wood Green Opportunity Areas (Policy SD1, Table 2.1). Opportunity Areas should fully realise their growth and regeneration potential, and planning decisions should support development which creates employment opportunities and housing choice for Londoners.
 - 3 The minimum affordable housing requirement for major residential development proposals is set at 35%, with an overall strategic target for 50% of all new homes delivered across London to be genuinely affordable. Policy H5 states that where a viability assessment is required to ascertain the maximum level of affordable housing deliverable on a scheme, the assessment should be treated transparently and undertaken in line with the Mayor's Affordable Housing and Viability SPG.
 - 4 Policy HC1 'Heritage conservation and growth' places importance on London's historic environment and seeks to ensure that development proposals avoid harm to heritage assets and assets of archaeological significance, by being sympathetic to the assets' significance as well as through design and appropriate mitigation.

Haringey Local Plan

Strategic Policies (2013, with alterations 2017)

- 5.15 The Local Plan Strategic Policies document sets out the vision and key policies for the future development of Haringey up to 2026.

- 5.16 The key policies are outlined below, with a detailed summary provided within **Error! Reference source not found.**
- 5.17 The minimum strategic housing target for Haringey over the plan period from 2011 to 2026 is 19,802 homes (820 units per annum from 2011-2014 and 1,502 units per annum). 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 exceed this target. Subject to viability, sites delivering 10 or more homes are required to meet a Borough wide affordable housing target of 40% (Policies SP1 and SP2).
- 5.18 The site is located within an 'Area of Limited Change' where growth is likely to make a modest but still important contribution towards the overall local development needs of Haringey, through opportunities on previously developed land and small-scale infill and conversions. Areas of Limited Change are expected to deliver 5,490 homes over the plan period, equating to c.25% of overall housing growth (Policy SP1, Table 3.1).
- 5.19 Policy SP12 seeks to ensure the conservation of the historic significance of Haringey's heritage assets and their setting. The site is located within the Bruce Castle Conservation Area and comprises a number of Listed Buildings, with a Tree Preservation Order (TPO) around the site boundary. The policy states that development should help increase accessibility to the historic environment where possible.

Development Management DPD (2017)

- 5.20 The Development Management DPD was adopted in July 2017 to provide the spatial strategy for managing development in the borough. It sets out criteria-based policies against which planning applications will be assessed. On adoption it superseded the Unitary Development Policies (2006 saved 2013) to become the main statutory development plan for the borough.
- 5.21 The following Development Management policies are of key relevance to the site (a full policy matrix is contained within **Error! Reference source not found.**
- 5.22 Policy DM10 'Housing Supply' states that windfall development will be considered acceptable where it complies with the relevant policies of the Plan. This includes housing mix, which should consider individual site circumstances such as location, character, and site constraints. In addition, this includes Policy DM13 'Affordable Housing' which seeks the maximum reasonable amount of affordable housing provision (40%), with regard to – inter alia – development viability and other planning benefits that may be achieved.
- 5.23 Proposals for new development will be assessed against the car parking and cycle parking standards set out in the London Plan (Policy DM32). All new housing is also required to meet or exceed the minimum internal and external space standards of the London Plan and the Mayor's Housing SPG, and alterations to existing residential buildings will be required to be of a high, site specific, and sensitive design quality (Policy DM12).
- 5.24 Policy DM9 'Management of the Historic Environment' focuses on the conservation and enhancement of the significance of heritage assets, their setting, and the wider historic environment. Proposals affecting a designated or non-designated heritage asset – such as the site – will be assessed against the significance of the asset and its setting and the impact of the proposals on that significance. When considering this impact, the Council will have

regard to the desirability of securing a viable use for a heritage asset, consistent with its conservation.

Other Material Considerations

5.25

The following supplementary planning documents and guidance are relevant material considerations in regard to the proposed development:

Greater London Authority SPDs and SPGs

- Affordable Housing and Viability SPG (2017)
- Housing SPG (2016)
- Play and Informal Recreation SPG (2012)
- All London Green Grid SPG (2012)

LB Haringey SPDs and SPGs

- Planning Obligations (S106) SPD (2018)
- Bruce Castle and All Hallows Conservation Area Appraisal and Management Plan (2019)
- Sustainable Design and Construction SPD (2013)

6.0 **Assessment of Proposed Development and Planning Benefits**

Key Planning Considerations

6.1 The key planning considerations which have been informed by the statutory development plan, other material considerations, pre-application discussions and the consultation process are as follows:

- The principle of residential development;
- Affordable housing provision;
- Proposed dwelling size mix;
- Residential amenity and standard of living for residents;
- Design, scale and layout;
- Conservation and heritage;
- Accessibility and inclusive design;
- Amenity, landscaping and playspace provision;
- Transport, access and parking;
- Servicing and waste;
- Energy, overheating and sustainability; and
- Environmental and other considerations (including noise, air quality, drainage, archaeology, fire, land contamination etc)

The principle of residential development

6.2 The site at Edmansons Close currently benefits from a C3 use where the Drapers' Charity has provided homes to a variety of people in need over the years. The proposals seek to retain residential use across the site, proposing a number of adaptations and extensions to the existing listed almshouses to ensure they are fit for purpose. The almshouses have been subject to a number of changes over the years and the accommodation is now small, cramped and does not meet modern day standards. This has meant that a number of the units have become vacant. Ensuring that the vacant units are brought back into use and are fit for purpose in the long term is in line with local plan policy H9 (ensuring the best use of stock) which promotes efficient use of existing stock to reduce the number of vacant dwellings.

6.3 The proposals are putting forward a sensitive restoration of the almshouses to protect their history but ensure that they can continue to be used long into the future. The standard of the accommodation falls short of basic standards.

6.4 Whilst the overall number of units on site will decrease from 61 to 48, the majority of existing accommodation comprises mainly studios. Although there is a reduction in units on paper, the majority of the studio units are too small and fall well short of basic standards.

- 6.5 The reduction is seen mainly from the adaptation of 44 existing almshouses which will reduce to 26 to enable amalgamation of some to provide improved internal space standards and family living. In line with Local Plan policies H8 (loss of existing housing) and DM10 (Housing Supply), there will actually be an increase in floorspace across the site through extensions and especially through the provision of the two new corner pavilions and apartment building. In this case, there is no loss of housing.
- 6.6 Policy GG2 (Making the best use of Land) of the London Plan encourages the development of brownfield land, prioritising sites well connected by public transport and seeks the potential to intensify the use where possible. The proposed site is a brownfield site, well connected with a PTAL of 5 and offers an opportunity to provide further housing on an area of land currently under-used. This area lies to the south east on the site where there currently exists a pre-fabricated laundry building and grassed area.

Affordable housing provision

- 6.7 London Plan policies H4 and H5 refer to delivering affordable housing and thresholds. The London Plan strategic target is for 50% of all new homes to be affordable, with a minimum threshold of 35%. Local Plan policy DM13 (affordable housing) seeks the maximum reasonable amount of affordable housing provision where the site capacity can provide more than 10 dwellings with reference to a borough 40% target.
- 6.8 A detailed Financial Viability Assessment has been prepared by JLL and fully justifies why the site cannot provide any affordable housing. This report concludes that the proposed scheme returns a Residual Land Value which is -£1.9mn below the Benchmark Land Value. On this basis, the scheme is technically unviable. Notwithstanding this, the Applicant is committed to delivering the scheme due to its long standing charitable operations on the site. It is important to note that any further unanticipated obligations beyond those listed in the Financial Viability Assessment may make the scheme undeliverable.

Proposed dwelling size mix

- 6.9 London Plan policy H10 (Housing Mix) states that in determining appropriate mix, applicants and decision-makers should have regard to robust local evidence of need, as well as the site's location and the need to deliver a range of unit types. Local Plan policy DM11 (Housing Mix) requests that proposals for new residential development should provide a mix of housing in line with these factors but also including the need to achieve inclusive and mixed sustainable communities.
- 6.10 The site at Edmansons Close currently benefits from a C3 use where the Drapers' Charity have provided homes to a variety of people in need over the years. The proposals seek to retain residential use across the site, proposing a number of adaptations and extensions to the existing. The site puts forward a mix which has been derived having regard to local and borough wide objectives as well as site and development specific circumstances.
- 6.11 The current mix on site is very restrictive with 48 studios, 1 x 1 bed and 12 x 2 bed units. The proposed accommodation provides a more suitable mix with 7 studios, 17 x 1 bed, 17 x 2 bed and 7 x 3 bed units.

Residential amenity and standard of living for residents

- 6.12 As previously mentioned, the current accommodation on site is cramped and in poor condition. The adaptations to the existing almshouses have been designed to improve internal layout and increase space standards. The floorspace schedule submitted with the application shows the areas by unit type. Whilst the almshouses will still fall slightly short of the Nationally Described Space Standards and London Plan standards, all new build accommodation will meet the required space standards. This is in line with London Plan policy D6 (Housing quality and standards) and Local Plan policy DM12 (Housing Design and Quality) which require adequately sized rooms with functional layouts.
- 6.13 The height of the almshouses has been retained with the new build elements across the site fully respecting their neighbouring buildings and the overall site setting. The apartment building which is set back from Bruce Grove extends to a maximum height of 3 storeys and steps down to 2 storeys towards the existing almshouses.
- 6.14 We have fully considered overlooking issues and the proposals have been designed to address this. This has been achieved by the position of the new build elements to provide adequate distances with the existing almshouses (the new apartment block has been repositioned to improve the situation) and the positioning of windows in the new accommodation so that windows to principal rooms do not overlook the existing almshouses.
- 6.15 The existing almshouses are designed to look out from the front elevations with the windows at the rear being very small, which helps with minimising overlooking. We have considered the neighbouring properties and ensured adequate distances are maintained and there is no direct overlooking.

Design, scale and layout

- 6.16 The design intention is to provide sensitive alterations to the site which fully respect its heritage, whilst improving on the current conditions and ensuring that a range of housing needs can be supported long into the future. Building heights have been maintained across the site and where new development has been introduced, this has also been designed to fit in with current heights and scale. This is in accordance specifically with Local Plan policy DM6 (Building Heights).
- 6.17 The adaptations to the existing almshouses are modest in scale retaining the existing lean tos of 18 units. All timber work is to be painted in heritage colours and will complement the London stock brick. Front doors and windows have been positioned to provide passive surveillance.
- 6.18 All the existing 'lean tos' on the rear elevations are retained with the exception of where we extend six of the proposed units to create three bed units.
- 6.19 The pavilions are simple in design and subservient to the ornate almshouses. Window proportions will match those of the almshouses. They will benefit from generous inset balconies and be constructed in reclaimed brick to match the existing historic buildings.
- 6.20 The apartment building provides a modest architectural form of a more contemporary nature. The materiality and design has been the focus of much discussion with Haringey

and the QRP to arrive at a solution which all believe now fits well within the site. The apartment building cannot be seen from the green in front of the almshouses, but has been positioned so that the entrance to the block can be seen from Bruce Grove.

- 6.21 Demolition of the 1970s infill provides an opportunity to remove a poorer, later addition. The new replacement almshouse will complement the existing almshouses and provides a turning point into the new access to the apartment building. This is in poor structural condition having suffered ground movement with inadequate foundations.
- 6.22 The Gatehouse remains largely unchanged externally other than the benefit of new French doors and will be restored to its former layout as a single dwelling.
- 6.23 The above is in line with Local Plan policies SP11 (Design) and DM1 (Delivering high quality design) which require a high standard of design and for development to contribute to the distinctive character and amenity of the local area.

Conservation and Heritage

- 6.24 The site lies within the Bruce Castle Conservation Area and includes a number of Grade II listed buildings (the almshouses, chapel and lodge). In line with paragraph 194 of the NPPF the significance of the assets has been fully appraised.
- 6.25 A detailed assessment of the application proposals is provided in Chapter 5 of the Heritage Statement. This notes the following:
- There is no reason why the 1970s infill building cannot be removed and replaced with a high quality designed scheme which responds well to surrounding context;
 - the discreet alterations to the almshouses which would be invisible from the landscaped area to the front of the buildings would allow upgrading of the existing residential accommodation, allowing the listed buildings to be put into a beneficial use;
 - with a pitched roof the almshouse extensions will be seen as a harmonious addition to the listed building which will be sympathetic to the significance of the buildings;
 - in respect of the listed buildings, the proposals have been informed by a detailed understanding of the listed buildings on the site and seek to better reveal significance through careful refurbishment. As a result of this, the proposals will, as a minimum, preserve the significance of the listed buildings and have the opportunity to better reveal significance;
 - In terms of the new build elements, the new almshouse is a carefully crafted piece of design which reinforces the site's heritage values and better reveals significance;
 - the height of the apartment building has been fixed to ensure it is not visible above the ridge line of the almshouses when looking towards the building from the front green and further from the north; and
 - the corner pavilions continue with the subtle response to the underlying heritage values of the site using the listed buildings to inform appearance but doing so in a modern manner.
- 6.26 The proposals are fully in compliance with heritage policy HC1 (Heritage conservation and growth) of the London Plan which requires development proposals to be sympathetic to

assets' significance and appreciation within their surroundings. It also complies with Local Plan policy DM9 (Management of the Historic Environment) which states that development that conserves and enhances the significance of a heritage asset and its setting will be supported.

Accessibility and inclusive design

- 6.27 All new buildings within the proposals will meet policy DM2 (Accessible and safe environments) of the Local Plan. The proposals will also meet the London Plan (2021) Policy D7 (Accessible Housing) which requires at least 10% of homes to be 'wheelchair user dwellings' M4(3) and 90% to meet Building Regulation M4(2).

Amenity, landscaping and playspace provision

- 6.28 All houses and ground floor apartments benefit from private gardens and upper floor apartments from balconies.
- 6.29 Communal amenity space will also be provided through sensitive improvements to the existing green fronting Bruce Grove. This includes informal playspace for children and an area for activities such as boules.
- 6.30 A detailed landscaping plan prepared by BD Landscape Architects is included within the Design and Access Statement which shows the wider site improvements.

Transport, access and parking

- 6.31 London Plan policy T2 (Healthy Streets) states development proposals should deliver patterns of land use that facilitate residents making shorter, regular trips by walking or cycling. Policy T5 also refers to minimum cycle parking standards and T6 (Car Parking) sets out maximum car parking standards.
- 6.32 Local Plan policy DM32 states that development proposals will be assessed against car parking and cycle parking standards set out in the London Plan. Policies DM2 and DM31 encourage safe and accessible cycling or access to public transport.
- 6.33 The Transport Statement includes a Framework Travel Plan to encourage more sustainable travel modes, primarily by adequate cycle storage, restricting access to on street parking, and making residents aware of local and sustainable and active travel options. The Transport Statement concludes that the development is acceptable in transports terms and meets local and national policy criteria. It identifies the following key items in drawing these conclusions:
- 6.34 Bus services are accessible within close proximity of the site;
- Regular services are available from Bruce Grove railway station;
 - The site benefits from good access on foot and by cycle to Bruce Grove centre. Indeed, there are many local amenities within close walk and cycle distance of the site meaning that residents would have less need to own a car;
 - Vehicular and pedestrian access to the site would be achieved from Bruce Grove;
 - Cycle parking will be provided on-site;

- Appropriate levels of car parking will be provided on-site in accordance with the current London Plan; and
- The proposals could result in no material change in traffic generation on the surrounding road network in the weekday peak hour and over a typical weekday.

Servicing and waste/ Deliveries

- 6.35 At present, refuse bins are left out and collected from the A10 Bruce Grove.
- 6.36 It is proposed that refuse vehicles will circulate around the site. Bin stores will be provided for the flats/houses either side of the central area, west of the proposed apartment building and east of the new Almshouse building. The bin stores are within appropriate walking distance from each dwelling, located less than 25m from Edmansons Close, minimising the distance bin collection personnel will be required to walk when collecting waste.
- 6.37 Other servicing activity for both the community and residential uses will, similarly, circulate around the site and will have the option of travelling along the existing service road before exiting the site to the east of the main exit at the existing position.
- 6.38 A Delivery Service Plan has also been produced by Motion. This sets out the approach to managing servicing and deliveries and will ensure that deliveries are undertaken in the safest and most efficient way.

Construction Logistics

- 6.39 A Construction Logistics Plan has been prepared by Motion to ensure that the impact of construction work on the local residents and the immediate highway network is kept to a minimum. At this stage, prior to the appointment of a contractor, some information relating to the CLP is unknown. The document therefore provides an initial assessment of the likely construction access strategy and arrangements. It will form a live document and will be updated by the contractor, once appointed, to include relevant information and if necessary, address issues that may be identified through consultation with local residents as the project progresses. Any revisions made to the draft CLP will be submitted to the council.

Energy, overheating and sustainability

- 6.40 The performance of the newly developed dwellings has been assessed in detail within the Dynamic Overheating Report and it is concluded that an acceptable overheating risk is achieved.
- 6.41 For the refurbished dwellings, mitigation measures were assessed based on feasibility and possible impacts and it was concluded that, for this development, adding internal blinds and increased air change rates are the most feasible measures to mitigate overheating on site.
- 6.42 In terms of energy and sustainability, separate reports for both these elements have been produced. The energy report highlights a number of improvements for the refurbished almshouses including draught proofing, insulating the roof, upgrading glazing performance, installing new gas boilers. For the new build elements, a combination of be lean and be green measures results in a 71% reduction over the Part L 2013 baseline for new

build development. This is a 45-50% reduction in carbon dioxide emissions over Part L 2021. A 25.2% reduction over this baseline is expected for the refurbished development. The remaining carbon dioxide emissions will be offset through a payment estimated at 6.1 tonnes per annum. This equates to a payment of £17,385.

- 6.43 The Sustainability Report outlines that the sustainability related aspects of the proposed development have been given equal consideration for both the refurbished and new build dwellings. It summarises all of the energy and sustainability features as a whole from across the Consultant reports.

Environmental and other considerations

Archaeology

- 6.44 Policy DM9 (Management of the Historic Environment) of the Local Plan aims to conserve and enhance the significance of heritage assets. The Archaeological desk based assessment notes that development of the site has the potential to impact on buried archaeological remains, although the likelihood of these being present is small. It suggests some archaeological intervention may be appropriate during or prior to development of the site.

Trees

- 6.45 Policy G7 (Trees and woodlands) of the London Plan requires that wherever possible, existing trees of value are retained. An Arboricultural Impact Assessment and Method Statement has been prepared by ACD Environmental. This statement explains that tree cover is found across the site and is varied in both age and species. Trees are predominately found on the large estate gardens on the frontage with Bruce Grove, with the remaining trees mostly situated on the rear boundary with the Magistrates Court.
- 6.46 All the surveyed and recorded 'A' and 'B' category trees are to be retained in line with policy G7. Adequate tree protection has been proposed to protect them throughout the demolition and development phases.
- 6.47 All the trees proposed for removal are in the lower two categories, 'C' and 'U', and are not of a quality that should represent any constraint to development. New trees will be planted to replace trees lost.

Ecology

- 6.48 CSA Environmental undertook a Preliminary Ecological Appraisal in 2019 which was followed by internal building inspections in July 2020. In line with current best practice survey guidelines, dusk emergence/dawn re-entry surveys were undertaken in July/August 2020. Updated building inspections were then undertaken in February 2022 and updated dusk emergence surveys were undertaken in May/June 2022 which focused only on those buildings to be directly impacted by the proposals.
- 6.49 Surveys confirmed the presence of a small (nonbreeding) bat day roost utilised by common pipistrelle and a small (nonbreeding) day roost utilised by soprano pipistrelle associated with the main roof of B3, on the northern elevation at the western end of the building. These roosts are considered to be of low conservation importance and will be retained under the proposals.

- 6.50 The proposed rear extensions to B3 and B5 are considered unlikely to result in disturbance impacts, given that the roosts are well removed from the proposed works. Nonetheless, to ensure no disturbance impacts during the construction and operational phases of the development, appropriate safeguards have been set out within CSA Environmental's latest August 2022 report.
- 6.51 The survey work has identified the likely absence of roosting bats in association with buildings B8, B10 and the outbuildings associated with B4. As such, it is concluded that these buildings can be demolished without the need for an EPS mitigation licence.
- 6.52 The previous survey work undertaken in 2019/2020 identified no evidence of roosting bats in association with B1, B2, B4, B6, B7, B9 and B11.
- 6.53 In relation to trees, appropriate works are set out in CSA's report where they may be required. This also includes recommendations for ecological enhancement measures that could be delivered at the site.
- 6.54 The above is in line with policy DM19 (Nature Conservation) which requires development which has an impact on important ecological assets to include appropriate mitigation where any harm is incurred. Only a small amount of pipistrelles were identified in some buildings and appropriate safeguards have been put in place to ensure no disturbance. Appropriate tree works and enhancement measures are also suggested.

Daylight/ Sunlight

- 6.55 Policy D6 (Housing Quality and Standards) of the London Plan states that development design should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context. It should also avoid overheating, minimise overshadowing and maximise the usability of outside amenity space. DM 1 (Delivering High Quality Design) of the Local Plan states all new development must achieve a high standard of design, relating positively to neighbouring structures.
- 6.56 In respect of the proposed development, 85 out of the 138 assessed habitable rooms (62%) meet the BRE recommended criteria for daylight. In terms of sunlight, 101 out of the 138 assessed habitable rooms (73%) meet the BRE recommended criteria.
- 6.57 Overall, the proposed development will experience good internal daylight and sunlight levels within habitable rooms. Those rooms which do not meet the recommended criteria are predominantly north facing living rooms or living/kitchen/dining rooms within the existing almshouses. These existing buildings are listed, hence there is limited opportunity to make changes due to their heritage status.
- 6.58 It should also be noted that the new BRE Guide Site layout planning for daylight and sunlight (2022) has been used for the assessment. Under the 2011 version of this Guide using average daylight factor (ADF) metrics, 92% of rooms met the BRE recommended criteria demonstrating a good level of internal daylight within the proposed development.
- 6.59 In respect of existing buildings, a detailed daylight and sunlight analysis has been carried out for the four closest dwellings which are most likely to be impacted by the development proposals. These are 51-57 Elsdon Road.

- 6.60 For daylight, The VSC metric has been used to assess windows (25) and rooms (17) within the neighbouring properties. All assessed windows and rooms (100%) achieve the BRE recommended criteria. Additionally, the daylight distribution metric has been used to assess rooms within the neighbouring buildings and all (100%) rooms also meet the BRE recommended criteria for daylight distribution.
- 6.61 For Sunlight, 12 out of the 15 assessed rooms (80%) achieve the BRE recommended guidelines for both annual and winter probable sunlight hours. 80% of rooms achieve the criteria for the annual period, and all assessed rooms (100%) meet the criteria during the winter period.
- 6.62 In conclusion, the proposed development will not significantly impact the levels of daylight or sunlight within the existing neighbouring buildings.

Contamination

- 6.63 A Phase 1 Contaminated Land Assessment was undertaken by GeoSmart. This concludes that the probability of a contaminant hazard at the site is low – unlikely. The overall land quality risks posed by the site are moderate – low.

Flood Risk/ SuDs

- 6.64 Policy SI 13 (Sustainable Drainage) of the London Plan aims to manage surface water run-off and Local Plan policies DM24 and DM25 aim to manage and reduce flood risk with water flow requirements in relation to SUDs.
- 6.65 GeoSmart's SuDS Infiltration Potential (SD50) map indicates the Site has a Low potential for infiltration, primarily due to the low permeability of the underlying geology (London Clay). Infiltration to ground is therefore unlikely to be feasible.
- 6.66 Ordnance Survey (OS) mapping indicates there is no surface water feature within 100 m of the site. Therefore, discharge to surface water is not considered feasible and thereby not proposed.
- 6.67 The regulated drainage and water search confirms the site is located within 20 m of the public sewer network and currently discharges to this. Due to the short distance to nearby sewers discharging surface water runoff to the sewer is considered feasible and is proposed.
- 6.68 The proposed drainage strategy is comprised of SuDS features which include rainwater harvesting butts, green roofs, a detention basin and permeable paving with a minimum holding capacity of 71.93 m³, to provide the required surface water attenuation volume of 71.39 m³ prior to discharging at a controlled rate to the nearby surface water sewer.
- 6.69 Surface water should be discharged at a restricted rate of 2.0 l/s, to match the greenfield run off rate as closely as possible without causing flood risk due to blockages and table 2 for associated calculations). This would ensure surface water runoff is managed according to national and local policy in all events up to and including the 1% AEP event plus a 40% allowance for climate change, as preferred by DEFRA non-statutory guidance (DEFRA, 2015).

Fire Safety

- 6.70 London Plan policy D12 (Fire Safety) requires all development proposals to achieve the highest standards of fire safety. All major development proposals are to be submitted with a Fire Statement.
- 6.71 A Fire Statement has been produced by Tetrattech which confirms that the fire safety of the proposed development and the fire safety information provided is compliant with and satisfies the requirements of London Plan Policy D12.

The Planning Benefits

There are a number of key planning benefits which the proposals will deliver. The key items include:

- Providing sensitive restoration of existing almshouses to ensure they are fit for purpose and survive long into the future;
- Providing a suitable mix of housing which caters for single people, couples and families in London where there is an acute shortage of housing of all types;
- Providing accommodation of a better size standard from the existing stock and creating modern dwellings which meet national described standards and the London Mayor's space standards;
- Sensitive re-location of existing residents on site to modern, fit for purpose accommodation from their current, poor quality, cramped accommodation;
- External enhancements to existing almshouses;
- Biodiversity enhancements;
- Amenity space enhancements;
- Sustainability measures including sustainable design and construction, energy and water saving measures, waste reduction, photovoltaic panels, bio-diverse roofs, ASHPs etc;
- Contribution to wider regeneration envisaged for the area through Tottenham Area Action Plan;
- Local employment during the construction phase;
- More efficient use of an existing brownfield site; and
- High quality design which fully respects the listed buildings and conservation area setting.

7.0 **S106, CIL and Draft HoTs**

Draft Heads of Terms LB Haringey has advised at pre-application stage that the proposed development will be subject to a number of planning obligations.

7.2 A draft list of HoTs has not yet been provided by LBH so we set out below the items which we believe may be sought, where appropriate. This has been compiled from a review of other residential schemes in the borough.

7.3 Please note that we request to review the draft wording of any obligations prior to any committee resolution.

Proposed HoTs

Transport and Highways

7.4 A commitment that the developer will investigate to the Council's satisfaction and, if appropriate, implement a car club scheme at the site;

7.5 Arrangements to be put in place to ensure that, with the exception of disabled persons, no resident of the development shall obtain a residents' parking permit within the Controlled Parking Zone.

Employment and Training

7.6 A financial contribution to fund local employment and training programmes;

7.7 A commitment that the developer will endeavour to use local suppliers and apprentice during construction;

Energy

7.8 A carbon offset payment;

Construction

7.1 Obligation to register with the Considerate Constructor scheme during the construction and demolition phase of the development;

Legal Fees

7.2 A Commitment to pay the Council's professional legal fees in drafting the S106 and monitoring this.

CIL The proposals will be subject to both the London Mayor's and Borough CIL.

7.4 The Mayor's most recently adopted MCIL 2 (February 2019) is charged at £60/sqm. Haringey's borough revised CIL (adopted 14 March 2022) is charged at £50/sqm. In calculating the overall CIL, it is understood that approx. 183 sqm of existing accommodation which is to be demolished and redeveloped will have been in use for a continuous period of at least six months within the period of three years ending on the day planning permission is granted.

S106

- 7.5 A Section 106 agreement (the legislative basis for planning obligations is Section 106 of the Town and Country Planning Act 1990) is a delivery mechanism for the matters that are necessary to make a development acceptable in planning terms.
- 7.6 Haringey requires planning obligations and CIL to operate in tandem on planning applications in the borough. A Planning Obligations SPD has been prepared which provides further guidance. Any necessary obligations required will be discussed in detail as part of the planning application process although the draft HoTs set out above provide an initial indication of the likely obligations.

8.0 Conclusions

- 8.1 This Planning Statement provides an assessment of the proposed development at Edmansons Close, Bruce Grove, Tottenham, N17 6XD in relation to national, strategic and local planning policies and guidance.
- 8.2 The Statement is submitted to assist in the determination of an application for full planning and listed building consent for:
- “Demolition of existing laundry building and 1970s infill building; alterations and extensions to 44 existing almshouses to create 8 x 1 bed, 12 x 2 bed and 6 x 3 bed units; alterations to existing Gatehouse to provide 1 x 2 bed unit; construction of 1 x new build 3 bed almshouse to replace 1970s infill building; construction of a new apartment building comprising 7 x studio units and 9 x 1 bed units; construction of 4 x new build 2 bed units within two new pavilions (2 units in each pavilion, 4 units in total); with landscaping; improvements to access; car parking; and ancillary development thereto.”*
- 8.3 The proposed development has been formulated in the context of relevant planning policy and guidance and in direct response to the pre-application feedback received from LB Haringey Officers, the QRP and residents/ community consultation.
- 8.4 The redevelopment of the Site provides an opportunity to deliver the following substantive planning benefits in accordance with planning policy requirements:
- 1 Providing sensitive restoration of existing almshouses to ensure they are fit for purpose and survive long into the future;
 - 2 Providing a suitable mix of housing which caters for single people, couples and families in London where there is an acute shortage of housing of all types;
 - 3 Providing accommodation of a better size standard from the existing stock and creating modern dwellings which meet national described standards and the London Mayor’s space standards;
 - 4 Sensitive re-location of existing residents on site to modern, fit for purpose accommodation from their current, poor quality, cramped accommodation;
 - 5 External enhancements to existing almshouses;
 - 6 Biodiversity enhancements;
 - 7 Amenity space enhancements;
 - 8 Sustainability measures including including sustainable design and construction, energy and water saving measures, waste reduction, photovoltaic panels, bio-diverse roofs, ASHPs etc;
 - 9 Contribution to wider regeneration envisaged for the area through Tottenham Area Action Plan;
 - 10 Local employment during the construction phase;
 - 11 More efficient use of an existing brownfield site; and
 - 12 High quality design which fully respects the listed buildings and conservation area setting.

Appendix 1 Planning Policy Matrix

Summary of Policy and Guidance Documents Relevant to the Development Proposals at Edmansons Close Almshouses, Tottenham

Topic	London Plan (2021)	Haringey's Local Plan: Strategic Policies (2013 with alterations 2017)	Haringey's Local Plan: Development Management DPD (2017)	Relevant Supplementary Planning Documents (SPD) and Guidance (SPG)
Housing	Policy GG4: Delivering the homes Londoners need Ensure that more homes are delivered; create mixed and inclusive communities with good quality homes that meet high standards of design; and support the strategic target of 50% of all new homes being affordable. Policy SD1: Opportunity Areas The site is located within the Crossrail 2 North Opportunity Area which has a total potential capacity to deliver an additional 28,000 homes from 2019-2041. Boroughs should support development which creates housing choice for Londoners and recognises the role of heritage in place-making. Policy H1: Increasing housing supply Sets a ten-year housing target for Haringey of 15,920 homes (2019/20 to 2028/29). To achieve this, the borough should optimise the potential for housing delivery on all suitable and available brownfield sites, especially on sites with a PTAL of 3-6 or which are located within 800m distance of a station or town centre boundary. Policy H4 and H5: Delivering affordable housing and thresholds The strategic target is for 50% of all new homes to be affordable, with a minimum threshold of 35%. Where a viability assessment is required, the assessment should be undertaken in line with the	Policy SP1: Managing Growth Identifies a minimum strategic housing target of 19,802 homes over the plan period from 2011-2026, with development to be focused in the Growth Areas (Wood Green, Tottenham Hale and North Tottenham) and Areas of Change (Tottenham High Road Corridor and Seven Sisters Corridor). Parts of the Borough outside of these areas – which includes the site – will experience some development ('Areas of Limited Change') and contribute towards meeting local development needs, with an indicative capacity of 5,940 units over the plan period (c.25% of housing growth). Policy SP2: Housing The Council will aim to make the full use of Haringey's capacity for housing by maximising the supply of additional housing to meet <u>and exceed</u> the minimum target of 19,802 homes. New housing will be expected to: • Meet the London Plan density matrix (<u>no longer applicable</u>) • Consider the design and space standards in the London Plan and Mayor of London's Housing SPG (March 2016), and play space standards in the Mayor's Play and Informal Recreation SPG (2012). • Meet Building Regulation M4(2) standards, with 10% meeting M4(3) standards. Units should range in size to accommodate various living needs	Policy DM10: Housing Supply The Council will resist the loss of all existing housing, including affordable housing and specialist forms of accommodation, unless the housing is replaced with at least equivalent new residential floorspace. Windfall development will be considered acceptable where this complies with the relevant policies of this Plan. Policy DM11: Housing Mix Proposals for new residential development should provide a mix of housing having regard to: • Individual site circumstances including location, character, constraints and scale • The target mix for affordable housing and the priority afforded to the delivery of affordable family housing • The need to achieve inclusive and mixed sustainable communities Proposals for comprehensive renewal of a social housing estate will be required to re-provide the existing affordable housing on an equivalent habitable room basis, tailored to better meet current housing needs and the achievement of more inclusive and mixed communities. Policy DM13: Affordable Housing The Council will seek the maximum reasonable amount of affordable housing provision when negotiating on	Haringey Planning Obligations (S106) SPD 2018 – Affordable Housing Mayor Of London / Greater London Authority's (GLA) Affordable Housing and Viability SPG (2017) Mayor Of London / Greater London Authority's (GLA) Housing SPG (2016)

Topic	London Plan (2021)	Haringey's Local Plan: Strategic Policies (2013 with alterations 2017)	Haringey's Local Plan: Development Management DPD (2017)	Relevant Supplementary Planning Documents (SPD) and Guidance (SPG)
	Mayor's Affordable Housing and Viability SPG. Policy H8: Loss of existing housing Loss of existing housing should be replaced by new housing at existing or higher densities with at least the equivalent level of overall floorspace, and demolition of affordable housing must be replaced by an equivalent amount of affordable floorspace. Policy H9: Ensuring the best use of stock Boroughs should promote efficient use of existing housing stock to reduce the number of vacant dwellings. Policy H10: Housing Mix To determine an appropriate mix, applicants and decision-makers should have regard to robust local evidence of need (or the 2017 London SHMA where this is not available), as well as the location of the site and the need to deliver a range of unit types.	including growing families and live-in carers. Subject to viability, sites delivering 10+ units are required to meet a Borough wide affordable housing target of 40% (based on habitable rooms), split into 60% affordable/social rent and 40% intermediate. The preferred affordable housing mix will be determined by negotiation, scheme viability and up to date assessments of local housing need. Schemes should ensure no net loss of existing affordable housing floorspace.	individual private residential schemes with site capacity to accommodate more than 10 dwellings, having regard to: • The achievement of the 40% affordable housing target • The individual circumstances of the site • The availability of public subsidy • Development viability • Other planning benefits that may be achieved. In negotiating the level of affordable housing provision viability assessments must be based on a standard residual valuation approach, with the benchmark existing use land value taken as the existing/alternative use value.	
Transport	Policy T1: Strategic approach to transport Facilitate the strategic target of 80% of all trips in London to be made by foot, cycle or public transport by 2041, and ensure any impacts on London's transport networks are mitigated. Policy T2: Healthy Streets Deliver patterns of land use that encourage shorter, regular trips by walking or cycling. Proposals should demonstrate how they will deliver improvements that support the 10 Healthy Streets Indicators.	Policy SP7: Transport The Council will promote the following travel demand management schemes to tackle climate change, improve local place shaping, and environmental and transport quality and safety: • Minimising congestion and addressing the environmental impacts of travel • Encouraging public transport, walking and cycling • Promoting road safety and pedestrian movement	Policy DM31: Sustainable Transport Developments with high trip generating characteristics should locate where public transport accessibility is high and car parking is minimised to mitigate generated car travel. Policy DM32: Parking Development proposals will be assessed against the car parking and cycle parking standards set out in the London Plan. The Council will support proposals for new development with limited or no on-site parking where:	London Cycling Design Standards

Topic	London Plan (2021)	Haringey's Local Plan: Strategic Policies (2013 with alterations 2017)	Haringey's Local Plan: Development Management DPD (2017)	Relevant Supplementary Planning Documents (SPD) and Guidance (SPG)
	Policy T4: Assessing and mitigating transport impacts Reflect and be integrated with current and planned transport access, capacity and connectivity. When required, transport assessments should be submitted to ensure that impacts are fully assessed and mitigated where appropriate. Policy T5: Cycling Create a healthy environment in which people choose to cycle, with new routes and improved infrastructure as well as the provision of appropriate levels of residential and visitor cycle parking in accordance with the minimum standards (Table 10.2). Policy T6 and T6.1: Residential Car Parking. Car parking should be restricted in line with levels of existing and future public transport accessibility and connectivity, with maximum residential car parking standards set out in Table 10.3. All residential car parking spaces must provide infrastructure for electric or Ultra-Low Emission vehicles. Where sites are redeveloped, parking provision should reflect the current approach and not be re-provided at previous levels. A Parking Design and Management Plan should also be submitted alongside all applications which include car parking, with reference to TfL guidance on parking management and design.	• Locating major trip generating developments in locations with good access to public transport • Adopting maximum car parking standards and car free housing wherever feasible • Supporting measures to influence behavioural change e.g. low carbon vehicles • Requiring transport assessments and travel plans for large scale proposals	• There are alternative and accessible means of transport available • Public transport accessibility is at least 4 as defined by PTAL • A Controlled Parking Zone (CPZ) exists • Parking is designated for occupiers of developments specified as car capped. Policy DM35: Cycle Storage in Front Gardens. Cycle storage on front gardens should be of high-quality design, should not be visually intrusive and should not harm the amenity of surrounding properties. Cycle storage should have regard to the size of the storage shelter, the building and the garden; its location; level of screening; and materials used.	

Topic	London Plan (2021)	Haringey's Local Plan: Strategic Policies (2013 with alterations 2017)	Haringey's Local Plan: Development Management DPD (2017)	Relevant Supplementary Planning Documents (SPD) and Guidance (SPG)
Heritage and Conservation	Policy HC1: Heritage conservation and growth Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. Proposals should also identify assets of archaeological significance and use this information to avoid harm or minimise it through design and appropriate mitigation.	Policy SP12: Conservation The Council shall ensure the conservation of the historic significance of Haringey's heritage assets, their setting, and the wider historic environment. This includes Statutory Listed Buildings, Conservation Areas, Archaeological Priority Areas, and other locally important assets such as Locally Listed Buildings and Local Historic Green Spaces. Where possible, development should help increase accessibility to the historic environment. Where archaeological excavation is required, findings should be published, disseminated, and used as the basis for interpretation on site.	Policy DM9: Management of the Historic Environment <i>Heritage Assets</i> Development that conserves and enhances the significance of a heritage asset and its setting will be supported. Proposals affecting a designated or non-designated heritage asset must submit a heritage statement, and will be assessed against the significance of the asset and its setting, and the impact of the proposals on that significance. When considering the impact of proposals on the historic environment, the Council will have regard to: • The priority given to sustaining and enhancing the significance of a heritage asset and its setting • The preservation/restoration of original or historic form, function or character of the asset and its setting • The relationship with adjoining and neighbouring uses • The desirability of securing a viable use for a heritage asset consistent with its conservation • An understanding of and respect for significance of heritage assets as parts of measures to mitigate and adapt to climate change • The contribution that the sensitive utilisation of heritage assets can make to sustainable regeneration. <i>Conservation Areas</i> Subject to the above, the Council will support, where appropriate, proposals for the sensitive redevelopment of sites	Bruce Castle and All Hallows Conservation Area Appraisal and Management Plan (July 2019)

Topic	London Plan (2021)	Haringey's Local Plan: Strategic Policies (2013 with alterations 2017)	Haringey's Local Plan: Development Management DPD (2017)	Relevant Supplementary Planning Documents (SPD) and Guidance (SPG)
			and buildings where these detract from the character and appearance of a Conservation Area and its setting, provided that they are compatible with and/or complement the special characteristics and significance of the area. Proposals for alterations and extensions to existing buildings in Conservation Areas should complement the architectural style, scale, proportions, materials and details of the host building and should not appear overbearing or intrusive. <i>Listed and Locally Listed Buildings</i> The Council will also seek opportunities to secure the future of listed buildings, provided: • They do not lead to substantial harm or total loss of their significance • They retain and repair existing features and fabric, or replace them in a sympathetic manner • They do not harm the structural integrity or stability of the building • Extensions are restricted to less significant parts of the building, relate sensitively to the original building and do not adversely affect the internal or external appearance or character of the listed building, curtilage or its setting.	
Design	Policy GG3: Creating a healthy city Ensure that new buildings are well-insulated and sufficiently ventilated to avoid the health problems associated with damp, heat and cold.	• Policy SP11: Design • All new development should enhance and enrich Haringey's built environment and create places and buildings that are high quality,	• Policy DM1: Delivering High Quality Design • All new development must achieve a high standard of design and contribute to the distinctive character and amenity of the local	Haringey Sustainable Design and Construction SPD (2013) Mayor Of London / Greater London Authority's (GLA) Housing SPG (2016)

Topic	London Plan (2021)	Haringey's Local Plan: Strategic Policies (2013 with alterations 2017)	Haringey's Local Plan: Development Management DPD (2017)	Relevant Supplementary Planning Documents (SPD) and Guidance (SPG)
	Policy D2: Infrastructure requirements for sustainable densities Density should be proportionate to the site's connectivity and accessibility by walking, cycling, and public transport to jobs and services (including both PTAL and access to local services). Policy D3: Optimising site capacity through the design-led approach Make the best use of land by following a design-led approach that optimises site capacity. 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. As part of this approach, proposals should: - positively respond to local distinctiveness (through layout, orientation, scale, appearance and shape) - encourage and facilitate active travel (with pedestrian and cycling routes/parking) - facilitate efficient servicing and maintenance of buildings and the public realm - deliver appropriate outlook, privacy and amenity - provide conveniently located green and open spaces - respond to the existing character of a place be of high quality, with thorough consideration to the	attractive, sustainable, safe and easy to use. All development should: - Respect local context and character and historic significance - 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, creating well-connected and high quality public realm and applying the 'Secured by Design' principles - Incorporate high quality landscaping - Seek the highest standards of access in all buildings/places - Ensure buildings are designed to be flexible and adaptable	area. The Council will support proposals which: - Relate positively to neighbouring structures - Make a positive contribution to a place/area, improving its character and quality - Confidently address feedback from local consultation - Demonstrate how the quality of the development will be secured when it is built - Are inclusive and incorporate sustainable design and construction principles - Have regard to surrounding building heights, form, scale and massing; the local framework of routes and spaces; maintaining a sense of enclosure; active frontages to the public realm; and distinctive local architecture. Development proposals shall also demonstrate how landscaping is integrated into the development. The Council will expect development proposals to respond to: landform, levels, trees, landscaped boundary treatments, and any significant biodiversity. Policy DM2: Accessible and Safe Environments New developments should be designed so that the layout improves people's access to social and community	

Topic	London Plan (2021)	Haringey's Local Plan: Strategic Policies (2013 with alterations 2017)	Haringey's Local Plan: Development Management DPD (2017)	Relevant Supplementary Planning Documents (SPD) and Guidance (SPG)
	practicality, flexibility, safety and building lifespan Policy D7: Accessible Housing New residential development (which is created via works to which Part M volume 1 of the Building Regulations applies) should include at least 10% M4(3) dwellings, with all other dwellings meeting M4(2) standards. Policy D6: Housing quality and standards Provide adequately-sized rooms with comfortable and functional layouts which are fit for purpose. New self-contained homes are required to meet the <u>minimum internal space standards</u> listed in Table 3.1, and detailed qualitative design aspects listed in Table 3.2.		infrastructure, and so that it improves and creates, where appropriate, safe and accessible pedestrian and cycling routes. Proposals should have regard to the principles set out in 'Secured by Design'. • Policy DM6: Building Heights • For all development proposals, the Council 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. • Policy DM12: Housing Design and Quality • All new housing is required to meet or exceed the minimum internal and external space standards of the London Plan and the Mayor's Housing SPG. • Ground floor family housing should provide access to private amenity space, and family housing on upper floors should have access to a balcony/terrace or to shared amenity/play space. • Alterations to residential buildings will be required to be of a high, site specific, and sensitive design quality, and respect and/ or complement the form, setting, period, architectural characteristics, detailing of the original buildings, including external features. High quality matching or complementary materials should be used appropriately and sensitively in relation to the context.	

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Amenity (including Open Space)	Policy D8: Public Realm Create new public realm where appropriate and ensure its design is safe, accessible, inclusive, attractive, well-connected, related to the local and historic context, and easy to understand, service and maintain. Policy S4: Play and informal recreation Proposals that are likely to be used by children and young people should incorporate good-quality, accessible play space for all ages, with at least 10m² per child. Policy D6: Housing quality and standards 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.	Policy SP13: Open Space & Biodiversity All new development proposals should provide amenity space in accordance with the Council's Open Space and Recreational Standards SPD, and seek on-site or financial contributions towards open space as set out in the Open Space SPD. In terms of play space, new development should: • Protect and enhance existing play spaces • Make provision for children's informal or formal play space in addition to amenity space • Provide children's play space to meet minimum of 3m² as set out in the Council's Open Space Standards SPD and an aspirational target of 10m² as set out in the Mayor's SPG Providing for Children's and Young People's Play and Informal recreation • Ensure easy access to a range of play opportunities for all children without the need to use public or private transport • Provide play spaces that are attractive, welcoming and engaging for all children and young people • Secure a financial contribution pursuant to a S106 Agreement towards the provision of Children's Play Space and ensuring its long-term maintenance is addressed through planning obligations	Policy DM1: Delivering High Quality Design Development proposals must ensure a high standard of privacy and amenity for the development's users and neighbours. The Council will support proposals that: • Provide appropriate sunlight, daylight and open aspects (including private amenity space where required) to all parts of the development and adjacent buildings and land • Provide an appropriate amount of privacy to residents and neighbouring properties to avoid overlooking and loss of privacy detrimental to the amenity of neighbouring residents and the residents of the development • Address issues of vibration, noise, fumes, odour, light pollution and microclimatic conditions likely to arise from the use and activities of the development. Policy DM3: Public Realm Major development proposals should consider how schemes can enhance local distinctiveness and legibility through the use of public art. New privately owned public spaces should promote secure, accessible and inclusive environments that positively relate to local context and incorporate high quality design and public realm features.	Haringey Planning Obligations (S106) SPD 2018 – Open Space and Public Realm Mayor Of London / Greater London Authority's (GLA) Play and Informal Recreation SPG (2012) Mayor Of London / Greater London Authority's (GLA) All London Green Grid SPG (2012)

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		Developers will need to demonstrate that the potential for play spaces for a range of outdoor activities and across different age groups can be provided on off-site open space(s) which already exist and are close to the application site and that they are working with the relevant groups to ensure the provision of safe, stimulating play facilities; and how they will secure new open/green spaces by identifying and securing funding to purchase and enhance such sites in areas of deficiency, such that there is a net increase in provision.	Policy DM7: Development on infill, backland and garden land sites Development proposals for infill, backland and garden land must: relate appropriately and sensitively to the surrounding area; provide a site specific and creative response to the built and natural features of the area; and retain and provide adequate amenity space for existing and new occupants. Policy DM20: Open Space and Green Grid All development providing new or replacement open space should, wherever possible, connect to the All London Green Grid.	
Sustainability (including Waste)	Policy GG2: Making the best use of land 1. Enable the development of brownfield land, particularly in Opportunity Areas, as well as utilising small sites. 2. Prioritise sites that are well-connected by public transport. 3. Proactively explore the potential to intensify the use of land to support additional homes, promoting higher density development, particularly in well-connected locations. 4. Understand what is valued about existing places and use this as a catalyst for growth, renewal, and place-making.	Policy SP6: Waste and Recycling To achieve sustainable waste management, the Council will require integrated, well-designed recycling facilities to be incorporated into all new developments. Site Waste Management Plans are required for all major applications, to identify volume and types of demolition and construction waste and to demonstrate how waste will be minimised and managed during construction and occupation. New waste management facilities will be required to take into account and minimise pollution and nuisance issues.	Policy DM4: Provision and Design of Waste Management Facilities All proposals should consider how to sustainably manage waste arising from the development during the design, construction and occupation phases of new developments – particularly new multi-storey flatted residential development. All proposals will be required to make on-site provision for general waste, the separation of recyclable materials and organic material for composting. Policy DM21: Sustainable Design, Layout and Construction All new development will be expected to consider and implement sustainable design, layout and construction techniques, including maximising opportunities to enhance biodiversity on-site, including through appropriate	Haringey Sustainable Design and Construction SPD (2013)

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			landscaping, Sustainable Drainage Systems, living roofs and green walls.	
Energy	Policy GG6: Increasing efficiency and resilience Ensure buildings are designed to adapt to a changing climate, and create a safe and secure environment which is resilient to the impact of emergencies including fire. Policy SI 2: Minimising greenhouse gas emissions Major development should be net zero-carbon and include an energy strategy to demonstrate how this target will be met. A minimum on-site reduction of at least 35% beyond Building Regulations is required, with residential development achieving 10% through energy efficiency measures. Policy SI 3: Energy infrastructure Major development proposals within Heat Network Priority Areas (the site) should have a communal low-temperature heating system. Policy SI 4: Managing heat risk Major development proposals should demonstrate through an energy strategy how they will reduce the potential for internal overheating and reliance on air conditioning systems, in accordance with the cooling hierarchy.	Policy SP4: A Low Carbon Haringey The Council will promote the measures outlined below to reduce carbon emissions from new and existing buildings: • requiring all new residential development to be zero carbon from 2016 onwards • requiring all developments to assess, identify and implement, where viable, decentralised energy facilities • requiring developers to prioritise connection to existing or planned networks where feasible • requiring all new development, where viable, to achieve a reduction in predicted carbon dioxide emissions of 20% from on-site renewable energy, which can include connections to local sources of decentralised renewable energy.	Policy DM21: Sustainable Design, Layout and Construction All new development will be expected to consider and implement sustainable design, layout and construction techniques, including: • Apply the energy hierarchy to minimise energy use and meet (or exceed) carbon dioxide reduction requirements • Apply the cooling hierarchy to reduce the potential for overheating and reliance on air conditioning systems Policy DM22: Decentralised Energy All development proposals should prioritise connection to existing or planned future DE networks.	Mayor Of London / Greater London Authority's (GLA) Energy Planning Guidance
The Natural Environment (Including Flooding/ Drainage, Biodiversity)	Policy G5: Urban greening Major development proposals should include urban greening as a fundamental design element, incorporating measures such as high-quality landscaping	Policy SP5: Water Management and Flooding All development should be water efficient during construction and	Policy DM19: Nature Conservation Development proposals on sites which adjacent to internationally designated sites, SSSIs, LNRs, SINCs or Ecological Corridors should protect and enhance the value of the site. Development that	

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and Ecology)	(including trees), green roofs, green walls and sustainable drainage. Policy G6: Biodiversity and access to nature 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. Policy G7: Trees and woodlands Ensure that, wherever possible, existing trees of value are retained. If their removal is necessary, there should be adequate replacement. The planting of additional trees should generally be included in new developments. Policy SI 13: Sustainable drainage Aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible. There should also be a preference for green over grey features, and drainage should be designed in ways that promote multiple benefits such as increased water efficiency, enhanced biodiversity, amenity and recreation.	operation and reduce all forms of flood risk. Development should: • Improve the water environment, water quality and drainage systems • Minimise water use • Take account of flood risk vulnerability classification • Implement measures to prevent (or mitigate) local surface water and downstream flooding • Implement SuDS to improve water attenuation, quality, and amenity. Policy SP13: Open Space & Biodiversity All new development should, where possible, protect and enhance designated Open Spaces, Green Chains, allotments, river corridors and other open spaces. Proposals should protect and improve sites of biodiversity and nature conservation, by: • Contributing to ecological habitats and, where possible, include green and brown roofs, rainwater harvesting, green walls, bird and bat nesting/roosting opportunities • Protecting, management and maintenance of existing trees and plant new trees where appropriate • Protecting, enhancing and creating Sites of Importance for Nature Conservation (SINCs) and Local Nature Reserves (LNRs).	has a direct or indirect adverse impact upon important ecological assets will only be permitted where the harm cannot be reasonably avoided, and appropriate mitigation can address the harm caused. Policy DM24: Managing and Reducing Flood Risk The Council will ensure that all proposals for new development avoid and reduce the risk of flooding to future occupants and do not increase the risk of flooding. All proposals for new development will be required to: Manage and reduce surface water run-off; and Manage water and waste water discharges. Policy DM25: Sustainable Drainage System The Council will require SuDS to be sensitively incorporated into new development via site layout and design as follows: • All major development will be required to reduce surface water flows to a greenfield run-off rate for a 1 in 100-year critical storm event • For all development where a greenfield runoff rate cannot be achieved justification must be provided to demonstrate that the run-off rate has been reduced as much as possible. Where SuDS are implemented, they will be expected to meet relevant national and local standards, be designed to maximise biodiversity and local amenity benefits, improve water quality and	

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			function effectively over the lifespan of the development. Policy DM27: Protecting and Improving Groundwater Quality and Quantity All proposals for new development will be required to identify existing and potential new sources of groundwater pollution and where appropriate, submit a relevant desktop study to demonstrate this has been fully considered. Policy DM29: On-Site Management of Waste Water and Water Supply New development proposals must ensure that there is adequate surface water, foul drainage and sewerage treatment capacity to serve all existing and new development.	
Air Quality	Policy SI 1: Improving air quality Proposals should be at least Air Quality Neutral and use design solutions to prevent or minimise increased exposure to existing air pollution. Major development proposals must be submitted with an Air Quality Assessment. Proposals must also demonstrate how they plan to comply with the Non-Road Mobile Machinery Low Emission Zone and reduce emissions from the demolition and construction of buildings following best practice guidance.		Policy DM23: Environmental Protection All development proposals should consider air quality and be designed to improve or mitigate the impact on air quality both in the borough and for occupiers of the development. Air quality assessments will be required for all major development and where necessary, adequate mitigation must be provided.	
Fire	Policy D11: Safety, security and resilience to emergency Maximise building resilience and minimise potential physical risks, including those arising as a result of extreme weather, fire, flood and related hazards.			

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	Policy D12: Fire safety All development proposals must achieve the highest standards of fire safety and ensure that they identify suitably positioned unobstructed outside space and convenient means of escape, incorporate appropriate features which minimise the risk of fire spread and reduce the risk of serious injury in the event of a fire, and provide suitable access and equipment for firefighting which is appropriate for the size and use of the development. All major development proposals should be submitted with a Fire Statement.			
Noise	Policy D13: Agent of Change Manage noise by ensuring good design mitigates and minimises existing and potential nuisances generated by existing uses and activities located in the area, exploring mitigation measures early in the design stage and separating new noise-sensitive development where possible from existing noise-generating businesses and uses. Policy D14: Noise Separate new noise-sensitive development from major noise sources through the use of distance, screening, layout, orientation, uses and materials.		Policy DM23: Environmental Protection The Council will seek to ensure that new noise sensitive development is located away from existing or planned sources of noise pollution. A noise assessment will be required to be submitted if the proposed development is a noise sensitive development.	

Celebrating
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Birmingham
0121 713 1530
birmingham@lichfields.uk

Edinburgh
0131 285 0670
edinburgh@lichfields.uk

Manchester
0161 837 6130
manchester@lichfields.uk

Bristol
0117 403 1980
bristol@lichfields.uk

Leeds
0113 397 1397
leeds@lichfields.uk

Newcastle
0191 261 5685
newcastle@lichfields.uk

Cardiff
029 2043 5880
cardiff@lichfields.uk

London
020 7837 4477
london@lichfields.uk

Thames Valley
0118 334 1920
thamesvalley@lichfields.uk



lichfields.uk