

BRAEMAR AVENUE BAPTIST CHURCH, LONDON N22 7BY

PLANNING STATEMENT



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1.0 INTRODUCTION

- 1.1 This Planning Statement has been prepared on behalf of Braemar Avenue Baptist Church (BABC) (the **Applicant**) and accompanies a full planning and listed building works application and a demolition in a conservation area application for works at Braemar Avenue Baptist Church, Haringey, N22 7BY (BABC) (the **Site**).
- 1.2 The main Church building was built in 1907 and statutorily listed in 1976. The listed building entry describes it as a *'decorative building in free Late Perpendicular style, of striking materials. Rough white flint rubble with proud black pointing; dressing of intensely red brick and terracotta'*.



BRAEMAR AVENUE BAPTIST CHURCH

- 1.3 Some of the building fabric is failing and many of the services within the building (e.g. heating, electrics, plumbing etc) are out of date and require replacement. Those works will be undertaken outside this application. Further improvements to the operation and functionality of the building are also proposed by the Pastor.
- 1.4 To the immediate south is a 195's single storey brick extension, which leads to the now defunct 'tin' Church Hall.



DEFUNCT CHURCH HALL

- 1.5 The Church Hall is understood to have been built as a mission church for use while the main Baptist Church was being built before being downgraded to be used as a church hall for church functions. The building is single storey set under a pitched roof, all clad with corrugated iron sheets. Structurally the building is in a significant state of disrepair, with visible bulging of the elevations, timber window degradation, iron corrosion and broken windowpanes.
- 1.6 Both the single storey 1950's brick addition to the main church and the tin hall are in a dilapidated condition. The tin hall particularly is in an extreme state of disrepair and is unusable.
- 1.7 The Church Pastor seeks to redevelop the Hall to provide a new purpose-built space for the church, together with an improved more informal and inviting entrance to the Church along Braemar Avenue.
- 1.8 BABC is an independent Baptist Church. BABC does not receive any funding from any other bodies or organisations and relies solely on tithes (donations) provided by the Church congregation.
- 1.9 The improvements to the main listed Church and the redevelopment of the Church Hall are necessary however the Church does not hold sufficient funds nor have access to funds to pay for the works. Accordingly, BABC have partnered with Urbanlab Ltd to deliver a mixed-use development incorporating 15 flats, the sales of which are proposed to directly fund the development of the replacement church hall without cost to BABC.
- 1.10 The proposal seeks to offer a positive contribution to the local housing stock and will enhance the existing church use through provision of the purpose-built Church Hall, replacing the defunct hall.

Structure of this Statement

- 1.11 This statement first provides a description of the Site and the surrounding area in section 2.
- 1.12 In section 3 we provide a summary of the Site's planning history
- 1.13 Prior to the submission of this application, the Applicants have sought to work proactively with the Council and have liaised extensively with Council Officers through formal requests for pre-application and have also consulted with the Quality Review Panel (QRP). The Applicants have also engaged with the local community through a consultation event held at the church. We provide a summary of those discussions in Section 4 of this statement and highlight how the proposals have evolved through those discussions. This section should be read alongside the Statement of Community Involvement (SCI), submitted as part of the application.
- 1.14 In section 5 we provide a description of the proposed development. This section should be read alongside the Design and Access Statement prepared by the project's architects, Spacelab.
- 1.15 In section 6 we set out the relevant planning policy framework applicable to the proposals, followed by section 7 where we provide a detailed planning assessment of the development against relevant policy and other material planning considerations.
- 1.16 Finally, this statement is concluded in section 8.
- 1.17 The planning application is supported by the following technical documents which should be read alongside this Planning Statement:

Document	Prepared By
Air Quality Assessment	Aeolus
Application Form and CIL Form	NTA
Basement Impact Assessment	Chelmer Global Ltd
Construction Logistics Plan	TTP
Daylight/Sunlight Assessments (Neighbouring and Within)	Anstey Horne
Draft Travel Plan	TTP
Drainage Statement	Elliot Wood
Design and Access Statement (including Landscaping) (DAS)	Spacelab
Energy Statement	Energylab
Fire Statement	Risk and Safety Plus
Flood Risk Assessment	Elliot Wood
Heritage Statement	The Built Heritage Consultancy
Noise Impact Assessment	KP Acoustics
Overheating Report	Energylab
Planning Drawings	Spacelab
Preliminary Ecology Assessment	ARM Conservation
Statement of Community Involvement (SCI)	NTA
Sustainable Design and Construction Statement	Energylab
Transport Statement	TTP
Viability Assessment	Redloft
Urban Greening Factor	Spacelab

2.0 DESCRIPTION OF THE SITE AND SURROUNDING AREA

- 2.1 The application Site comprises the defunct tin hall, the adjacent 1950's extension to the main church, and the land that immediate surrounds these parts. The main church sits outside the application Site but falls under the Applicants ownership. The relevant Site comprise a total area of 665m². The land outside the red line boundary but within the applicant's ownership comprises a total of 1,274m².
- 2.2 Immediately to the north of the Site lies the main Grade II listed Church which was built in a late Gothic Revival style in contrasting flintwork and dark red brickwork with terracotta dressings.
- 2.3 To the north-western corner is a prominent tower that extends marginally higher than the steeply pitched, gabled roof of the main church.
- 2.4 On the northern elevation is the main entrance and several faux extensions and actual extensions to the rear, southern elevation.
- 2.1 The southern window to the apse has been infilled with low grade brickwork dating from the mid-20th century, detracting from the significance of the listed building.
- 2.2 Further south is a single storey, flat roofed 1950's extension built of unexceptional red brick with large lime mortar joints. Unfortunately, this low-grade mid-20th century extension has resulted in several alterations to the rear of the original church which detract from its significance.



BRAEMAR AVENUE BAPTIST CHURCH (SOUTH ELEVATION)

- 2.3 The extension's interior is typical of its period with crittall-type steel casements and a steel and glass lantern to the roof above. The extension appears to have been used for utilitarian purposes (e.g., WCs) and lacks any meaningful detailing.
- 2.4 To the south of the main Church is the original Church Hall. This building is understood to have been built as a mission church while the main church was erected.
- 2.5 The building is single storey, set under a pitched roof and clad with corrugated iron sheets. Externally the building is almost entirely without notable detailing. The gothic arched architrave and paired entrance doors to the entrance are the only suggestion of a link to an ecclesiastical building.

- 2.6 Structurally the building shows clear signs of disrepair due to bulging of the elevations, window timber degradation, iron corrosion and broken windowpanes. The interior is also highly utilitarian and lacking notable detailing. Iron ties are visible to the interior across the span at various points, clearly used to give the building additional structural support. It is beyond reasonable repair for reuse.



EXISTING REDUNDANT CHURCH HALL

- 2.7 The Site lies in the north-western part of the Trinity Gardens Conservation Area. The Conservation Area is subdivided into several sub areas, the site lies in Sub Area 1 - Trinity Gardens, Bounds Green Road and Park Avenue. This area, which comprises the western part of the conservation area, is focused on Trinity Gardens and is characterised by a sense of openness, containing Nightingale Gardens, an elongated park which extends south towards Wood Green Common, to the immediate east of the site.

- 2.8 Properties along Braemar Avenue and to the south of the Site are Victorian in appearance and typically are two storey red brick dwellings with characterful two storey canted bays, set under pitched tiled roofs.



TYPICAL PROPERTIES IN BRAEMAR AVENUE

- 2.9 Braemar Avenue is a no through road which operates north to south connecting to Bounds Green Road at a priority junction. It has a 20mph speed restriction. The road is subject to residential parking controls operating from 8:00am – 6:30pm. Intermittent single yellow lines are located alongside the eastern side of the road and bike hangar cycle parking facility is located on the carriageway in front of the Site. There is a mixture of parallel and echelon marked parking spaces on Braemar Avenue.
- 2.10 Bounds Green Road (A109) provides a two-way carriageway operating southeast to northwest. It has a 20mph speed restriction. Near the Site there are double yellow lines with double blips on Bounds Green Road and there are cycle lane markings with advisory white lines on the eastbound lane and solid white lines on the westbound lane. There is a pedestrian crossing facility on Bounds Green Road to the east.
- 2.11 To the southeast, Bounds Green Road connects to High Road (A105) whilst to the northwest it becomes known as Station Road beyond the junction with the North Circular Road (A406), which is part of the Transport for London Road Network. Access onto the North Circular Road can also be taken from the A105 Green Lanes to the northeast. To the south, the A105 connects to Seven Sisters Road (A503), also part of the TLRN, at Manor Road Station.
- 2.12 The Site is located within Controlled Parking Zone (CPZ) 'WG' with parking controls operating from 8:00am – 6:30pm. On Braemar Avenue the parking spaces on-street directly outside the Site are shared use resident permit holders and pay by phone bays (max stay 2 hours, no return 2 hours). To the south and on the opposite side of the road the parking spaces are resident permit holders only.
- 2.13 The Site is accessible by a variety of modes of transport with a large number of amenities within a short walking distance of the Site. Public Transport accessibility Levels (PTALs) are a theoretical measure of the accessibility of a given point to the public transport network, considering walk access time and service accessibility. The method measures the density of the public transport at a particular point, providing a scale from a range of 0 (worst) to 6b (best), with 6b demonstrating excellent levels of accessibility.
- 2.14 The Site has a PTAL level of 6a, demonstrating that it has very high levels of accessibility to public transport, and represents a highly sustainable location in planning terms, where development should be promoted.

3.0 PLANNING HISTORY

A. SITE

- 3.1 The Councils online planning records indicate three historic applications for works at the Site. We provide a summary below.
- 3.2 In 1956, an application was approved for the erection of a store shed (ref: OLD/1956/0049).
- 3.3 Of material relevance, in 1973, an application for the erection of a new Church and a three-storey block comprising 6 x 2 persons flats at ground floor and 6 x 5 maisonette over was approved at the Site (ref: OLD/1973/0097).
- 3.4 Finally, in 1977 an application was refused for the erection of a chain link fence to Braemar Avenue (ref: OLD/1977/0768).

B. THE SURROUNDING AREA

- 3.5 The majority of nearby planning applications relate to householder extensions and are considered to be of no material relevance to the proposals.

4.0 PRE-APPLICATION CONSULTATION

a. The Council

- 4.1 The proposals have evolved over the course of four years. The project architects were initially appointed in 2018 to carry out a feasibility study development. Three formal requests for pre-application advice and a Quality Review Panel, plus additional design workshops with officers have informed the formal proposals which permission is now sought. We provide a summary of the advice provided by the LPA and the QRP below.

Pre-App One - PRE/2018/01787

- 4.2 In July 2018, pre-application advice was sought from the Council. The proposed development sought to demolish the dilapidated Church Hall to the south of the site to allow for the construction of part a 3, part 4 storey building (over basement) comprising new church hall extension (204m²) and 16 flats. Internal and minor external alterations to the adjacent listed church, together with landscaping improvements were also included in the application.



PRE-APP ONE (BREAMAR AVENUE ELEVATION)

- 4.3 The scheme was generally welcomed by the LPA as it would improve and rationalise the existing church site in providing new church facilities whilst preserving and restoring the existing church building itself. The principle of providing residential units on Site was supported and the LPA sought a balanced housing mix which met local policy.
- 4.4 The LPA agreed that the 19th century corrugated iron church hall nor the 1950's extension to the rear of the main church were important to retain, so there was no 'in principle objection' to the demolition of the Church Hall. However, the LPA did require the replacement building to be developed from a robust context and urban analysis which factored in the sites setting and surroundings.
- 4.5 The LPA were concerned with the number of large trees that were proposed to be removed as they were considered to make a significant contribution to the Conservation Area and visual amenity. Officers advised they would resist the removal without clear and robust reasoning.
- 4.6 In terms of design, the LPA concluded that the height and scale of the proposed building at 4 storeys required refinements to sit more comfortably with the adjacent terraces and listed church building. Officers advised that the ridge height of the main church should remain the tallest part of the streetscene and the views of the church tower maintained from surrounding roads and public spaces.

Pre-App Two - PRE/2019/0250

- 4.7 In November 2019, the applicants submitted a follow-up pre application to Haringey Council. The proposed development was similar to that previously submitted, demolition of dilapidated church hall, to allow for the construction of part 3, part 4 storey building (over basement) comprising new church hall extension and 15 flats. Internal and minor external alterations to listed church together with landscaping improvements.

**PRE-APP TWO (BREAMAR AVENUE ELEVATION)**

- 4.8 The Council remained supportive of the application in principle. The LPA considered the scheme responded better to the context and site setting. However, officers did state that the height of the parapet should be reduced. In terms of design, officers welcomed the design approach of the front façade however, stated that the rear façade required further refinements. In terms of housing mix, the LPA were happy with the proposal.
- 4.9 Additionally, officers commented on the balconies stating they were too deep and wide which made them appear dark. The LPA suggested narrowing or breaking up the openings and/or introducing side openings. Further design amendments were suggested to the flank wall of the residential block facing the back of the church over the single storey link.
- 4.10 Officers considers that the materials proposed for the scheme needed further exploring. However, the Council did appreciate that the current proposals were a work in progress.
- 4.11 In terms of heritage and conservation, the Council were happy that the scheme had evolved and considered that the scheme now responded well to the overall context and the proposed fourth floor set back mitigated the impact of height.
- 4.12 In terms of housing mix, the Council considered the scheme provided a mix of units “which were appropriate for the Site.”
- 4.13 In terms of sustainability, the Council stated that an Energy Assessment, Sustainability Statement and Overheating Report are required. These reports accompany this application.
- 4.14 In terms of highways and transport, the Council requested a Transport Statement be submitted. This accompanies the application and details parking provision and impacts, proposed access and arrangements, delivery and servicing/refuse and recycling arrangements and cycle parking. A Construction Logistics Plan also accompanies the application.

Pre-App Three - PRE/2021/0066

- 4.15 In February 2021, the Applicants submitted a further follow up pre-application taking onboard the LPA's comments at the previous two. The proposed development was for the 'demolition of the existing church hall, to allow for the construction of a part 3, part 4 storey building (over basement) comprising new church hall extension and 15 flats. Internal and minor external alterations to adjacent listed church, together with landscaping improvements were also included'.



PRE-APP THREE (BREAMAR AVENUE ELEVATION)

- 4.16 The LPA considered the revised scheme addressed previous design and conservation comments, but further refinement was sought to the front, rear and flank façade of the building.
- 4.17 In terms of the standard of accommodation, the LPA had considered an improvement was made however further refinement were still required and suggested that any family sized units be located on the ground or top floor, where the units would have access to larger amenity space.
- 4.18 The LPA supported the proposed mix.
- 4.19 The proposal included replacement trees to mitigate some limited loss, which officers supported on balance.
- 4.20 From a transport perspective, officers noted that the development had the potential to increase movements to and from the Site and sought clarification through any formal consent.
- 4.21 Officers considered that the proposals had development positively and invited the Applicants to present the latest scheme to the council Quality Review Panel ahead of submitting any formal application.

Quality Review Panel (QRP)

- 4.22 In December 2021, the applicants submitted a request to present the proposals to the Quality Review Panel. The presentation to the Panel was undertaken on 15 December 2021. The Panel was attended by local architects and officers of the planning dept.
- 4.23 The Quality Review Panel provides impartial and objective advice from a diverse range of highly experienced practitioners. It is intended that the panel's advice may assist the development management team in negotiating design improvements where appropriate and in addition may support decision-making by the Planning Committee, to secure the highest possible quality of development.

- 4.24 In summary, the Panel felt the scheme offered a number of benefits but required further justification for the basement-level church hall.
- 4.25 The Panel were comfortable with the proposed height and massing but felt the architecture could be more assertive and suggested some of the earlier proposed materials were reinstated (e.g metal cladding).
- 4.26 The Panel also considered the approach to landscape was positive but requested more indigenous species be selected as well as a green roof where possible.
- 4.27 Finally in terms of sustainability, the Panel felt that the embodied carbon of the proposals should be formally assessed and should guide the design and selection of materials.

b. The Local Community

- 4.28 Please see Statement of Community Involvement

5.0 THE PROPOSED DEVELOPMENT

- 5.1 This section should be read alongside the enclosed Design and Access Statement prepared by the project architects, Spacelab. We provide a summary of the proposed development below.
- 5.2 It is proposed to demolish the existing dilapidated tin Church Hall located to the south of the main Church and replace it with a 4-storey building, plus basement. The building will comprise 15 self-contained flats, replacement church hall and associated facilities. All 15 units are proposed to be delivered at market tenure.
- 5.3 A single storey glass connecting link is proposed to replace the existing 1950's brick link between the Church Hall and the main Church. The link will comprise an informal lobby/ meeting area for the Church and toilet. The proposed link will not connect the residential block to the Church, access will only be provided through the glass link to the basement level of the adjacent four storey building which will comprise the new Church Hall. The glass link will have green roof.



PROPOSED BRAEMAR AVENUE ELEVATION

- 5.4 The basement level of the structure comprises a Church Hall, toilet facilities, plant room, lift and court yard which all service the Church. Additionally at basement level separate to the Church facilities are the lower levels of four maisonette units and a bike store and lift which serve the residential units only.
- 5.5 The ground floor level accommodates five flats, four of which are the upper levels of the maisonette flats. One flat is accessed individually off the street and the remaining four are accessed off a communal core. All units have private amenity space. Additionally, an integrated bin store is provided at ground floor level for the Church and is located to the west of the Church Hall entrance. One wheelchair accessible unit is provided at this level, to the rear of the building.
- 5.6 At first-floor level a further four flats are provided, one, 1 bed 1 person, two, 2 bed 4 persons and one, 3 bed 4 person; all which have private amenity space in the form of balconies. All units are accessed off the main core.
- 5.7 At second floor level, a further four flats are provided. One, 1 bed 1 person, two, 1 bed 2 person and one, 3 bed 4 person; all units are served with private amenity space in the form of balconies.
- 5.8 The third-floor level is set back off all the principal building lines below, and provides just two further flats, two, 2 bed x 3 person flats. A large amount of private amenity space is provided to each flat in the form of a roof terrace, separated with a privacy screen. The roof terrace can be accessed from multiple rooms in each flat.
- 5.9 Finally, the roof accommodates a green, biodiverse roof with south facing PV panels.

- 5.10 A communal bin store is located on the ground floor which services all 15 residential units. It can be accessed internally and externally.
- 5.11 All ground floor units will have bike storage within their gardens and a communal bike store is located at basement level to accommodate all upper floor units. The store holds 18 bikes. A lift is provided which meets the required measurements for bikes so residents can easily transport their bike to and from the bike store.
- 5.12 One disabled car parking space is provided along Braemar Avenue which services the one accessible unit located on the ground floor level.
- 5.13 In terms of landscaping both private and public spaces have been designed. New trees are proposed along the resident's walkway as well as the new church link.



PROPOSED CGI ALONG BRAEMAR AVENUE

6.0 RELEVANT PLANNING FRAMEWORK

6.1 The relevant planning policy framework for this application comprises the following:

- NPPF (National Planning Policy Framework) (2021)
- NPPG (National Planning Policy Guidance)
- London Plan (2021)
- Haringey's Development Management Plan DPD (2017)
- Haringey Strategic Policies DPD (2013)
- Haringey's Housing Strategy 2017 - 2022
- New Local Plan (2022- 2037)

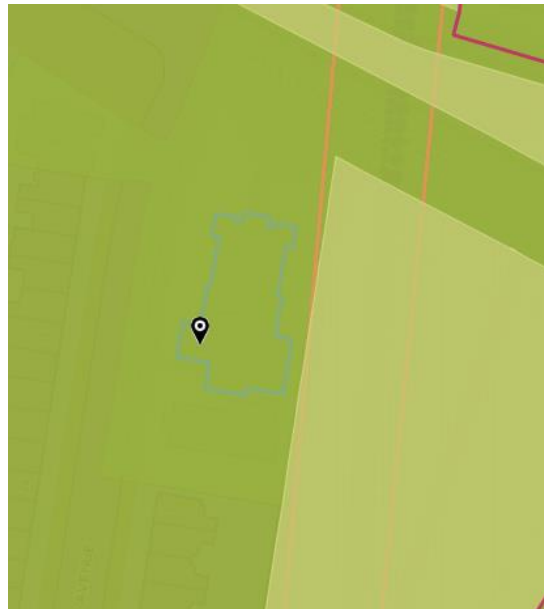
6.2 In accordance with the Council's Proposals Map, the grade II listed Site lies with three designated areas, listed below.

- Trinity Gardens Conservation Area
- Critical Drainage Area
- Family Housing Protection Zone

6.3 The Site also lies adjacent to an;

- Historic Park
- Local SINC
- Open Space
- Green Chain
- Blue Ribbon

6.4 The Site is within residential Charging CIL Zone 2.



PROPOSALS MAP EXTRACT

7.0 PLANNING ASSESSMENT

7.1 Having regard to the proposed development, pre-application advice and the relevant local plan policies, the principal material considerations are:

- a. Principle of Development
- b. Unit Mix
- c. Housing standards
- d. Amenity
- e. Design and Heritage
- f. Biodiversity and UGF
- g. Highways and Transport
- h. Energy, Sustainability and Overheating
- i. Drainage and Flood Risk
- j. Basement Impact Assessment
- k. Air Quality
- l. Fire

7.2 We assess each matter in turn below.

a. Principle of Development

7.3 The NPPF, paragraph 60, states that *“To support the government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay”*.

7.4 Paragraph 69 further states that small and medium sized sites can make an important contribution to meeting the housing requirement of an area and are often built out relatively quickly. To promote the development of a good mix of sites, local planning authorities should, amongst other things, ***“(c) support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes; and (d) work with developers to encourage the sub-division of large sites where this could help to speed up the delivery of homes”***. The above is further emphasised in section 11 (making effective use of land) of the NPPF.

7.5 The London Plan echoes the NPPF. Policy GG2 (Making the best use of land) seeks to create successful sustainable mixed-use places that make the best use of land. The Policy states that those involved in planning and development must enable the development of brownfield land, particularly in Opportunity Areas, on surplus public sector land, and sites within and on the edge of town centres, as well as utilising small sites, prioritise sites which are well-connected by existing or planned public transport and proactively explore the potential to intensify the use of land to support additional homes and workspaces, promoting higher density development, particularly in locations that are well-connected to jobs, services, infrastructure and amenities by public transport, walking and cycling, and apply a design-led approach to determine the optimum development capacity of sites.

7.6 London Plan Policy GG4 (Delivering the Homes Londoners Need) further states that to create a housing market that works better for all Londoners, those involved in planning and development must ensure that more homes are delivered, support the delivery of the strategic target of 50

- percent of all new homes being genuinely affordable, and create mixed and inclusive communities, with good quality homes that meet high standards of design and provide for identified needs.
- 7.7 At a local level, Haringey's Development Management Policy DM10 (Housing Supply) states that the Council will facilitate the delivery of 19,802 new homes on previously developed land with the Borough by 2026. Policy SP1 directs new housing to areas identified as having capacity to accommodate growth, primarily within Tottenham and Wood Green. However, whilst allocated sites are prioritised, the Council anticipates proposals for windfall development will continue to come forward and where they are deemed to comply with the relevant policies of Plan, windfall developments are deemed to make a valuable contribution to Haringey's housing supply over and above the sufficient allocated sites.
- 7.8 The Policy further states that development will be expected to contribute towards the creation of mixed and balanced communities that respond to local and strategic need. This will be achieved through setting an overall target for 50% of all new homes to be affordable.
- 7.9 The Site lends itself to the development of housing. It is in a predominantly residential area with good transport links to central London and surrounding areas. In line with the Mayor of London's Good Growth Objectives (GG) the Site is brownfield.
- 7.10 The principle of the proposed housing development is acceptable and should be strongly supported.
- 7.11 With regard to the proposed replacement church hall, paragraph 93 of the NPPF states that to provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community.
- 7.12 Policy S1 of the London Plan adds that development proposals that provide high quality, inclusive social infrastructure that addresses a local or strategic need and supports service delivery strategies should be supported. New facilities should be easily accessible by public transport, cycling and walking and should be encouraged in high streets and town centres.
- 7.13 At local level, DM DPD Policy 49 states that the Council will seek to protect existing social and community facilities unless a replacement facility is provided which meets the needs of the community. The policy further adds that proposals for new and extended social and community facilities and the sharing of facilities will be supported by the Council provided they are accessible by public transport, walking and cycling, are located within the community that they are intended to serve; provide flexible, multifunctional and adaptable space, where practicable; do not have significant adverse impact on road safety or traffic generation; and protect the amenity of residential properties.
- 7.14 The proposed church hall facility will serve the needs of the church which has been long established at the Site. The hall replaces a defunct church which the church has been unable to years for a number of years, not having the funds the develop it appropriately. The facility will serve the needs of the church including its Sunday school, and other church related activities. Where there is capacity beyond the use of the church, it is intended to open the facility up to the local community for other use. The actual use will develop over time as the facility establishes.
- 7.15 The principal of the proposed replacement and improved church hall should be strongly supported.

b. Unit Mix

- 7.16 The proposed unit mix comprises 2 x 1 bed (1-person), 5 x 1 bed (2 persons), 5 x 2 bed (3 persons) and 3 x 3 bed (4 persons), totalling 15 units.
- 7.17 There are no specific percentage targets within Haringey for housing mix. Within the supporting text for Policy SP2: Housing, policy states “In order to encourage mixed and balanced communities, the Council will aim to ensure that an adequate mix of dwelling sizes is delivered within new developments.” Furthermore, paragraph 7.4 of the Haringey Housing Strategy states that the Council will maintain a balance of tenure and types across homes in the borough, they will do this by “not supporting proposals which result in an overconcentration of 1 or 2 bed units.”
- 7.18 The surrounding area is principally characterised by terraced single family homes. The proposals provide 20% family sized homes, with the remainder as 1 and 2 bed units. Having regard to the proposed mix and the local context, the proposals are considered to avoid an overconcentration of 1 and 2 bed units.
- 7.19 With regard to affordable housing, Policy DM13: Affordable Housing states that there is a borough wide target of 40% affordable housing on all schemes 60% of that provision is to be social affordable rent and 40 % to be intermediate housing.
- 7.20 In this instance it is not viable for the applicant to provide any affordable units due to the nature of the proposals Please see the accompanying FVA report produced by Redloft Consulting. In summary for development to commence on site, the provision of a new church hall is required to replace the dilapidated hall currently on site, as well as refurbishment works to the existing church.
- 7.21 The existing church refurbishment works comprise approx. £206,325, whilst the new church hall amounts to circa £790,331. The provision of these works results in a total residual profit of £673,360 or 9.91% of the estimated Gross Development Value; £686,040 below the total benchmark profit of £1,359,400 (20% of the GDV), which shows that proceeding with this scheme is a financial risk for the developer. Based on the outcome of the objective viability appraisal assessment the scheme is not economically viable. It is therefore conclusive that the provision of additional affordable housing, section 106 obligations, or other planning gain contributions, exceeds the maximum viable level at the site in planning terms.

c. Housing Standards

- 7.22 Policy DM1, DM12 and SP2 state that proposals must comply with space standards as outlined in the London Plan and the Mayor’s Supplementary Planning Guidance SPG as amended to take account of the national technical housing standards, complying with both internal and external space requirements, as outlined in the table below.

Number of bedrooms(b)	Number of bed spaces (persons)	1 storey dwellings	2 storey dwellings	3 storey dwellings	Built-in storage
1b	1p	39 (37) *			1.0
	2p	50	58		1.5
2b	3p	61	70		2.0
	4p	70	79		
3b	4p	74	84	90	2.5
	5p	86	93	99	
	6p	95	102	108	
4b	5p	90	97	103	3.0
	6p	99	106	112	
	7p	108	115	121	
	8p	117	124	130	
5b	6p	103	110	116	3.5
	7p	112	119	125	
	8p	121	128	134	
6b	7p	116	123	129	4.0
	8p	125	132	138	

NATIONALLY DESCRIBED SPACE STANDARDS

7.23 Each unit exceeds the above requirements. Please see Accommodation Schedule below.

Church Accommodation Schedule					
	Beds	People	Area [Sq M]	Amenity Space [Sq M]	Total
CHURCH COMMUNITY					
Existing					
Ground Floor Church	-	-	510	-	-
Tin Tabernacle	-	-	178	-	-
Proposal					
Lower Ground Floor	-	-	141	5	-
Ground Floor	-	-	65	-	-
TOTAL					
Additional Church Area	-	-	206	5	-
Additional Church Area with Existing	-	-	716	5	-

Residential Accommodation Schedule Option 1					
	Beds	People	Area [Sq M]	Amenity Space [Sq M]	Additional Amenity [Sq M]
RESIDENTIAL					
Lower Ground Floor					
Unit 0.1 (Maisonette)	2	3	73.2	6	11.5
Unit 0.2 (Maisonette)	2	3	70.2	6	9
Unit 0.3 (Maisonette)	2	3	70	6	5.75
Ground Floor					
Unit 0.4 (Maisonette)	3	4	85.6	27.8	-
Unit 0.5 (DDA)	1	2	55.6	5.6	-
First Floor					
Unit 1.1	1	2	50	5	-
Unit 1.2	3	4	74	9.2	-
Unit 1.3	1	2	50	5	-
Unit 1.4	1	1	46.1	6	-
Second Floor					
Unit 2.1	1	2	50	5	-
Unit 2.2	3	4	74	9.2	-
Unit 2.3	1	2	50	5	-
Unit 2.4	1	1	46.1	6	-
Third Floor					
Unit 3.1	2	3	63	46	-
Unit 3.2	2	3	61	57	-
TOTAL					
Total Residential Area	-	-	918.8	204.8	26.25
TOTAL UNITS					
(DDA)	1	2	-	-	1
	1	1	-	-	2
	1	2	-	-	4
	2	3	-	-	5
	3	4	-	-	3
Total Number of Units	-	-	-	-	15

PROPOSED ACCOMMODATION SCHEDULE

- 7.24 One wheelchair unit is proposed, a 1bed, 2person unit at ground floor level with direct, step free access from the pavement. The unit accommodates living/kitchen and one bedroom to the rear overlooking the garden and a family bathroom.
- 7.25 In terms of amenity space, each unit has at a minimum 5 sqm of private outdoor space in the form of a garden at ground floor level or balconies for the upper floor flats. All private outdoor spaces will be secure, north or south facing and provide a safe usable space for residents.

d. Amenity

- 7.26 Policy DM1 states that 'development proposals must ensure a high standard of privacy and amenity for the development users and neighbours. The Council will support proposals that;
- Provide appropriate sunlight, daylight, and open aspects to all parts of the development and adjacent buildings and land
 - Provide an appropriate amount of privacy to their residents and neighbouring properties to avoid overlooking and loss of privacy detrimental to the amenity of neighbouring residents and the residents of the development and
 - Address issues of vibration, noise, fume, odour, light pollution and microclimatic conditions likely to arise from the use and activities of the development.'
- 7.27 All units are dual aspect with acceptable levels of daylight and sunlight. A BRE assessment is submitted herewith. The impact of the development on neighbours has also been assessed through a BRE assessment, submitted with this application. There are only few windows on the eastern boundary which could be affected, however the proposals have been designed with te staggered rear and side elevation to ensure that daylight/sunlight impact is minimised.
- 7.28 The plan form of the proposals further respects the outlook from neighbouring windows, and the appropriate location of windows and outlook ensures any potential overlooking of the adjacent houses is mitigated.
- 7.29 The level of potential harm in terms of overshadowing to these properties has also been assessed within the submitted Daylight and Sunlight Report, which is deemed acceptable.
- 7.30 The Local Authority take the conventional approach of considering daylight and sunlight amenity with reference to the various numerical tests laid down in the Building Research Establishment (BRE) guide 'Site Layout Planning for Daylight and Sunlight: a guide to good practice, 2nd Edition' by P J Littlefair 2011. A new European standard BS EN 17037 'Daylight in Buildings' was published in May 2019. An update to the BRE guide to consider the European standard is expected sometime in 2021. It is not yet clear, how and to what extent, the European recommendations will be adopted by the BRE and Local Authorities. The NPPF states that the BRE numerical guidelines should be considered in the context of the National Planning Policy Framework (NPPF), which stipulates that local planning authorities should take a flexible approach to daylight and sunlight to ensure the efficient use of land.
- 7.31 Policy DM1 'Delivering High Quality Design' subsection D deals with Privacy and Amenity. The policy states that 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".

- 7.32 A sunlight and daylight assessment has been undertaken by Anstey Horne for the proposed development. Their reports conclude that the majority of the windows and rooms assessed with the neighbouring properties meet the BRE guidelines for daylight and sunlight. Where windows have been identified as falling short of the guidelines, this is isolated to the neighbouring property at 1 Braemar Avenue. In terms of daylight, the BRE guidelines recommend that the results of the two daylight tests are considered in tandem and where windows fall short of the guidelines for VSC, all of these windows serve rooms which adhere to the guidelines for daylight distribution.
- 7.33 In terms of sunlight availability, all of the rooms assessed are shown to exceed the guideline value on both an annual and winter basis.
- 7.34 In conclusion, the layout of the proposed development follows the BRE guidelines and will not significantly reduce daylight or sunlight to the existing surrounding properties. Therefore, Haringey's planning policy on daylight and sunlight to neighbouring will be satisfied.
- 7.35 In terms of unlight and daylight within the proposed development, there are no mandatory standards. Haringey's planning policy seeks to provide good living conditions for residents of new housing developments, including the provision of adequate daylight and sunlight within the dwellings. The daylight results indicate that 83% of the rooms assessed achieve the guideline values for TI. All bar one of the main living rooms within the development achieve or exceed the guideline values for daylight. The sunlight assessments shows that 71% of the rooms achieve the guideline values for SE. All main living rooms achieve or exceed the guideline values for sunlight.
- 7.36 In conclusion, the layout of the proposed development follows the BRE guidelines and will provide good daylight and sunlight conditions within the proposed accommodation.
- 7.37 In addition, KP Acoustics were commissioned to undertake an environmental noise survey and noise impact assessment in order to assess the suitability of the Site for residential use together with the church use. A copy of their report is submitted herewith. In summary the detailed environmental noise survey undertaken has established the currently prevailing environmental noise climate around the Site. The environmental noise impact upon the proposed dwellings has been assessed in the context of national and local planning policies. Appropriate target internal noise levels have been proposed. These are achievable using conventional mitigation measures. The assessment shows the Site, subject to appropriate mitigation measures, is suitable for residential development in terms of noise.

e. Design and Heritage

- 7.38 Paragraph 126 of the NPPF states that *"The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities."*
- 7.39 The above is reiterated in the London Plan, particularly Policy D3 (Optimising site capacity through the design-led approach), which states that *"all development must make the best use of land by following a design-led approach that optimises the capacity of sites, including site allocations. Optimising site capacity means ensuring that development is of the most appropriate form and land use for the site. The design-led approach requires consideration of design options to determine the most appropriate form of development that responds to a site's context and capacity for growth, and existing and planned supporting infrastructure 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”.

- 7.40 Policy DM1 of the Development Management Plan: Delivering High Quality Design states that the Council will support design -led development proposals which are appropriate in scale, height, mass, bulk, and form, to its site and context. New developments must complement the existing streetscape rhythm and ensure the architecture language is coherent.
- 7.41 Policy 11 of the Local Plan, states that new development needs to be of the highest standard of design that respects its local context and character and historic significance.
- 7.42 Local Policy SP12 Conservation states that “the Historic Environment should be used as the basis for heritage-led regeneration and as the basis for good design and positive change. Where possible, development should help increase accessibility to the historic environment.”
- 7.43 Braemar Avenue forms part of sub area 1 of the Trinity Gardens Conservation Area. The CA statement states that the area is characterised by a sense of openness and verdure. Shrubs, trees and planting are widespread throughout the area and form an important element of the character and appearance. Most properties are of Victorian origin and are of architectural interest which positively contribute to the character and setting.
- 7.44 The statement goes on to state that the use of good external materials, in particular good quality facing brickwork, is of the greatest importance. The Council encourages good quality development but in all such proposals design and conservation considerations must be primary parameters from the outset.
- 7.45 The design rationale is set out in further detail in the Design and Access Statement produced by the project architects, Spacelab, and further assessed from a conservation and heritage perspective within the enclosed Heritage Statement. We provide a summary below.
- 7.46 The proposals stem greatly from the feedback provided by officers when the applicant took the Site to pre application in July 2018, January 2020, February 2021 and then the QRP in December 2021, as detailed in section 4 of this statement.
- 7.47 The proposal offers a predominantly 4 storeys building (plus basement) with the southern elevation being the main façade. The fourth floor is set back on all elevations. The 3-storey massing, with set-back fourth floor, reflects the local context, which is characterised by 2-3 storey pitched roof Victorian style dwellings, and the adjacent principal church building. The proposed angled and stepped terracing of the top floors reduces the overall bulk and mass of the building and provides an elegant and exciting built form. The building has been broken down visually so that the overall form can be read as three distinct blocks, each which mimic the width of a typical terraced house adjacent.
- 7.48 Additionally, there is a single storey element to the development which infills the gap between the existing Church and the proposed residential block and replaces the existing listed 1950’s add-on found to the rear of the main church. This element of the building provides improved access to the main church and to the basement level of the development which comprises the new Church Hall.
- 7.49 The building’s material palette reflects the predominant red brick palette of Braemar Avenue, together with a pinkish metal cladding for the recessed top floor which tempers the projects impact from Braemar Avenue approach. Light metal railings are used for balconies.

- 7.50 The proposals are designed to improve the existing setting, demolishing the existing dilapidated Church Hall and replacing it with a very high standard of residential design quality, making a very positive contribution to the character and appearance of the area.
- 7.51 The Heritage Statement has assessed the significance of the local heritage assets and any in the surrounding area that might potentially be affected by the scheme proposals. It has also assessed the potential heritage impacts on the identified heritage assets in light of the proposed scheme.
- 7.52 The church hall makes only a limited contribution to the significance of the listed building, and a limited contribution to the character and appearance of the conservation area.
- 7.53 The proposed scheme would create a limited degree of harm to the significance of the listed building through the demolition of the church hall. Most other parts of the proposals have been assessed as having a neutral impact on the significance of the listed building. Overall, the cumulative impact of the scheme on the overall special interest of the church is considered to fall between neutral and less than substantial harm, on the lowest part of that spectrum.
- 7.54 The heritage assessment notes that the scheme proposals would cause a degree of harm to the significance of a focal building within the conservation area by demolition of the church hall, as well as marginally harming a key view within the conservation area. However, much of the scheme would preserve the character and appearance of the conservation area.
- 7.55 The scheme, taken as a whole, overall would result in a degree of harm to the character and appearance of the conservation area, considered to fall between neutral and less than substantial harm at the lowest end of the spectrum.
- 7.56 The overall public benefits of the scheme which include a new church hall, 15 new self-contained homes, high design quality and landscaping are sufficient to outweigh the heritage harm identified.

f. Biodiversity and UGF

- 7.57 Crown Tree Consultancy completed a tree report of the Site. The report concludes, there are no tree preservation orders affecting trees within the site there are also no tree preservation orders on trees immediately adjacent to the Site. Please see accompanying report. The proposed development will result in the loss of 4 small trees and one larger mature tree to the rear of the site adjacent Trinity Gardens. To mitigate their loss, it is proposed to plant a new mature tree within Trinity Gardens to infill an existing visible gap within the established tree line bordering the Site. It is also proposed to plant several additional trees within the application site to replace the trees lost. The trees are located principally towards Braemar Avenue, thereby contributing to the verdant streetscape.
- 7.58 An Arboricultural Method Statement will be required to ensure that all other trees are protected during the construction phase which can be secured by condition.
- 7.59 With regard to biodiversity, ARM Consultants completed a Preliminary Roost Assessment of the Site. The assessment concluded that both buildings that are proposed to be demolished have a 'negligible potential' to support a bat roost due to their structure and materials used, together with the lack of any potential roost features.
- 7.60 The internal inspection of the two buildings did not locate any evidence of current or past bat occupancy within the property. The external inspection of the two buildings also did not locate

any evidence of current or past bat occupancy within the property. In accordance with nationally published guidance, it is therefore recommended that no dusk emergence surveys are required to be completed during the bats' active season in order to confirm the presence/absence of a roost in either building.

- 7.61 The proposals look to support new planting through trees and hedge planting, together with the improvement of biodiversity features, principally through green roofs. The site achieves a UGF of score 0.4255, which is policy compliant for 'predominantly residential' developments (policy target being 0.4). Please see calculation extract below.

Urban Greening Factor Calculator				
Surface Cover Type	Factor	Area (m ²)	Contribution	Notes
Semi-natural vegetation (e.g. trees, woodland, species-rich grassland) maintained or established on site.	1		0	
Wetland or open water (semi-natural; not chlorinated) maintained or established on site.	1		0	
Intensive green roof or vegetation over structure. Substrate minimum settled depth of 150mm.	0.8		0	
Standard trees planted in connected tree pits with a minimum soil volume equivalent to at least two thirds of the projected canopy area of the mature tree.	0.8	426	340.8	
Extensive green roof with substrate of minimum settled depth of 80mm (or 60mm beneath vegetation blanket) – meets the requirements of GRO Code 2014.	0.7	202	141.4	
Flower-rich perennial planting.	0.7		0	
Rain gardens and other vegetated sustainable drainage elements.	0.7		0	
Hedges (line of mature shrubs one or two shrubs wide).	0.6	16.3	9.78	
Standard trees planted in pits with soil volumes less than two thirds of the projected canopy area of the mature tree.	0.6	27.6	16.56	
Green wall –modular system or climbers rooted in soil.	0.6		0	
Groundcover planting.	0.5		0	
Amenity grassland (species-poor, regularly mown lawn).	0.4	791.95	316.78	
Extensive green roof of sedum mat or other lightweight systems that do not meet GRO Code 2014.	0.3		0	
Water features (chlorinated) or unplanted detention basins.	0.2		0	
Permeable paving.	0.1		0	
Sealed surfaces (e.g. concrete, asphalt, waterproofing, stone).	0	225.75	0	
Total contribution			825.32	
Total site area (m²)				1939.6
Urban Greening Factor				0.4255104145

UGF CALCULATION

g. Highways and Transport

Trip Generation

- 7.62 A Transport Statement and a Travel Plan have been produced by TTP Transport Consultants. We enclose a copy of their statements with this application. We provide a summary of the transport related matters below.
- 7.63 There will be no change to the operation of the existing Church as a result of the development. It is envisaged that the use of the church hall and the wider Church generally, will continue to be for the church congregation and local persons. It is expected that the church hall would mainly be used for Sunday school.
- 7.64 Given there is no fixed programme yet for the ancillary use of the hall, it is not considered necessary to carry out a detailed trip generation assessment of the church hall. Further, there is only one church site in London available in the TRICS database, with the survey taking place on a Sunday but there being no differentiation between trips to the main Church building and church hall. The seating layout shows potential for up to 97 persons which will be on a one off basis. When it is used for events, site users may travel from further afield. Site users will be encouraged to travel by non-car modes. Through measures and initiatives in the Travel Plan, site users will be made aware of the lack of parking available, local parking restrictions and the excellent level of accessibility of the site by public transport.

7.65 With regard to the residential element, TTP Consulting have assessed the potential number of person trips for the proposed development, this have been estimated based on multi-modal trip rates from the TRICS database based upon available data considering the characteristics of the site:

- Suburban areas
- A PTAL rating of 4 or more
- Surveys undertaken weekday, Monday through Friday in the past 5 years.

7.66 The TRICS output report below provides a summary of the trips rates and resultant total person trips for 15 units for the weekday morning and evening peak hours along with daytime 7am – 7pm.

Table 5.4 – Total Person Trip Rates and Trip Generation

Time Period	Trip Rates per Unit		Total Person Trips (15 units)	
	In	Out	In	Out
8am – 9am	0.076	0.399	1	6
5pm – 6pm	0.293	0.186	4	3
Total (7am – 7pm)	2.238	2.486	34	37

TOTAL PERSON TRIP RATES AND TRIP GENERATION

7.67 The proposal is predicted to generate 1 additional bus trip during the morning peak hour and 2 additional bus trips during the evening peak hour. In the context of the circa 80 plus bus services that can be caught each hour from bus stops within walking distance of the site, the additional bus trips are unlikely to affect levels or service.

7.68 There are expected to be 4 trips by underground in the morning peak hour and 3 trips in the evening peak hour as well as 2 trips by rail in both the morning and evening peak hours. Again, the additional rail and underground trips per hour are unlikely to affect levels of services.

7.69 The assessment suggests that the proposed development will not lead to a detrimental impact on public transport.

7.70 In terms of travel by car there is not expected to be any additional trips during the peak hours.

Parking Considerations

7.71 No on-site car parking will be provided as part of the development, and this is considered appropriate given the highly accessible location of the site and is in accordance with policies provided in the London Plan and the London Borough of Haringey's Local Plan Policy DM32. The proposed development will be car-free and residents of the development will not be eligible apply for a parking permit within the estate or within local controlled parking zones.

7.72 TTP undertook a parking beat survey which has demonstrated that there is ample capacity overnight; there are between 80-87 observed spaces using the 6m analysis and 104 – 107 available spaces using the 5m analysis.

7.73 Car ownership data for privately owned flatted development in Haringey indicates between 0.24 – 0.71 cars per household depending on number of bedrooms per unit. Applying this to the 15 residential units indicates there could be demand for 8 cars to park. Despite the survey demonstrating that there is capacity to be able to accommodate this level of demand, a permit free agreement will be secured.

Access

- 7.74 There will be no change to the Church access from Bounds Green Road.
- 7.75 There will be a new secondary access from Braemar Avenue which will consist of both steps and a ramp to cater for wheelchairs, pushchairs etc located to the rear of the Church. There will be steps and a lift down to the new Church Hall at lower ground floor level. The door from the Church to the residential basement is a provisional secondary escape route to the Church.
- 7.76 In terms of the residential block, the main entrance will be from Braemar Avenue and it will be step free. Within the block there will be both a lift and stairs to reach the lower and upper levels.

Highways

- 7.77 The existing crossover is to be removed and reinstated as a footway albeit the lowered kerb and single yellow line will be retained and relocated slightly north of its current position to facilitate movement of bins from the development to the collection vehicle which will wait on Braemar Avenue.

Disabled Parking

- 7.78 The proposal will be car free in accordance with London Plan Policy T6.1 and Local Plan Policy DM32. It is proposed however that a disabled parking space is provided on Braemar Avenue measuring 6.6m.

Cycle Parking

- 7.79 Cycle parking is provided in accordance with the London Plan minimum standards. In total the development will provide 40 cycle parking spaces.
- 13 spaces in a covered store by the Church entrance
 - 1 space in front of the church entrance
 - 18 at lower ground floor level
 - 8 spaces through bike boxes

Refuse Collections, Servicing and Deliveries

- 7.80 In accordance with Haringey's Sustainable Design and Construction SPD a Site Waste Management Plan has been provided. Policy DM4 'Provision and Design of Waste Management Facilities' states that proposals for new multistorey flat residential development will be required to make provision for
- 7.81 Adequate temporary storage space within each flat, allowing for separate storage of recyclable materials
- 7.82 Adequate communal storage for waste, including separate for recyclables, pending its collection and
- 7.83 Storage and collection systems at each floor which are sensitively integrated into the development, with the Council giving preference to basement servicing over the use of forecourts or ground floor internal storage.

- 7.84 Collection from the Site is to be as per existing arrangement for the Church and Church Hall.
- 7.85 The waste store for the proposed residential units will be located at ground floor level within the building. In accordance with policy, there will be 5 shared bins, including 2 x 1,100l Eurobin for general waste, 2 x 1 100L Eurobins for recycling and 1 x 360L bin for food waste.
- 7.86 All residents will have access to the store internally from the building. There will be a side access from the store leading to the ramp which would be used by Council collection staff. IT is acknowledged that the bin store will be approximately 10.5 - 11m from the vehicle which will stop on Braemar Avenue, which has been accepted by the Council during pre-application.

Mitigation

- 7.87 Car club membership will be offered to each unit for three years plus a £50 driving credit per unit to 'pump prime' car club usage.
- 7.88 A Church Hall Travel Plan has been prepared and submitted as a standalone document as part of the planning application. The Travel Plan will be implemented particularly for one-off events where there may be trips by people from further afield. It includes a package of measures to encourage travel by non-car modes given the excellent accessibility of the site by non-car modes.

Construction

- 7.89 An Outline Construction Logistics Plans has been prepared by TTP Consulting. In accordance with Haringey's Local Plan the accompanying has been with reference to Transport for London's Construction Logistics Plan guidance.
- 7.90 Policy SP11 'Design' states that new development should enhance and enrich Haringey's built environment by ensuring impact on health, climate change, natural resources and biodiversity are minimised by adopting and improving sustainable design and construction techniques.
- 7.91 D.SG4 'Planning and construction of new development' describes that all major development should sign up to the considerate constructor's scheme and where appropriate a constructors' forum. It describes that major development is required to:
- a. "comply with the non-road mobile machinery low emission zone requirements*
 - b. minimise levels of noise, vibration, artificial light, odour, air quality, fumes or dust pollution*
 - c. consider the routing, timing and frequency of heavy goods vehicle movements to reduce their impact on vulnerable road users, local amenity and congestion*
 - d. use, where available, construction and/or freight consolidation centres, and*
 - e. consider the impact of construction on the water supply, flood risk and drainage and implement suitable mitigation measures where required."*
- 7.92 TTP were instructed to prepare a Construction Environmental Management Plan (CEMP) to provide details of the management of traffic during the construction period and a strategy to minimise the potential for disruption to local residents, businesses, and other users of the adjacent highway network. The CEMP is submitted herewith.
- 7.93 The Project Manager will be responsible for implementing the measures set out within the CEMP. They will dedicate a set amount of time to ensure procedures are being followed and standards are being met. Copies of the document will also be made available for all workers and suppliers at

the site to view. The CEMP will be a 'live' document and regularly reviewed and updated as necessary by the Project Manager. The Project Manager's details will always be available in the event someone wishes to make a complaint or suggestion.

h. Energy, Sustainability and Overheating

- 7.94 Policy DM21 'Sustainable Design, Layout and Construction' and Policy DM22 'Decentralised Energy' sets out the requirements for residential developments in terms of applying the energy hierarchy to minimise energy use in order to meet, and if possible, exceed, minimum carbon dioxide reduction requirements.
- 7.95 Development proposals should also seek to integrate the cooling hierarchy in accordance with sustainable design, layout and construction principles. This will help to ensure that buildings are better equipped to manage their cooling needs in energy efficient ways over their lifetime. This policy applies the cooling hierarchy set out in the London Plan:
1. Minimise internal heat generation through energy efficient design
 2. Reduce the amount of heat entering a building in summer through orientation, shading, albedo, fenestration, insulation and green roofs and wall
 3. Manage the heat within the building through exposed internal thermal mass and high ceiling
 4. Passive ventilation
 5. Mechanical ventilation
 6. Active cooling systems
- 7.96 Energy Lab have produced an Energy Assessment for the proposed development which is submitted herewith. The report confirms that the energy and carbon reduction strategy under the climate change mitigation measures proposed for the development are in line and in compliance with the relevant and applicable targets and requirements listed within the planning policies of Haringey Council and the Local Plan.
- 7.97 The Energy Statement for the new development has been developed in line with the London Plan Energy Hierarchy principles to reduce the energy associated CO2 emissions using the 'Be Lean, Be Clean, Be Green and Be Seen' approach.
- 7.98 The target reduction in CO2 emissions is a minimum of 35% on site through the proposed design against the Part L 2021 target. This is to be achieved with a minimum reduction of 10% achieved via passive energy demand reduction measures and 25% due to incorporating on site renewable technologies and mechanical systems. The remaining CO2 emissions to reach the target zero carbon will be offset by a one-off payment made to the local authority.
- 7.99 Energy Lab have also produced an overheating report which concludes that the proposed development remains in compliance with CIBSE TM59 guidelines in reducing the risk of overheating, particularly in summer months. The climate change measures proposed for this development are in line and in compliance with the relevant and applicable targets and requirement listed with the planning policies of Haringey's Council and the London Plan.
- 7.100 Two models were assessed in IES VE to assess overheating risk in line with the GLA cooling hierarchy utilising CIBSE weather file DSY1:
- Model A – utilising solely passive cooling measures – **Pass rate 55%**
 - Model B – utilising mechanical ventilation - **Pass rate 88%**

- 7.101 As stated, the addition of mechanical ventilation with heat recovery supplying fresh air and extracting stale air from occupied spaces ensures all 85% are compliant with CIBSE TM59 criteria. It is anticipated that the rooms failing will require additional mitigation measures through external shading or active cooling.
- 7.102 Please refer to the submitted statements enclosed for further detail.

i. Drainage and Flood Risk

- 7.103 In accordance with Policy DM25 'Sustainable Drainage Systems' and DM26 'Critical Drainage Areas' of the Haringey Development Management Plan a Drainage Strategy has been produced by Elliot Wood. The Site is located within a 'Critical Drainage Area'. The assessment concludes that the new foul and surface water drainage systems for the site be discharged to the Thames Water Sewer network.
- 7.104 Both foul and surface water drainage serving the lower ground floor will be pumped. A proportion of the foul drainage serving the ground floor level and above is to be drain by gravity; there are some areas which cannot drain by gravity due to restrictions on levels and will therefore be directed to the basement pump.
- 7.105 Surface water drainage proposals for the development are to incorporate SuDS including water butts for rainwater harvesting, green and blue roofs, permeable paving and below ground attenuation tanks. The drainage system for all new hard standing areas will be designed for storms up to and including the 1 in 100year event plus 40% climate change. The surface water run off rate will be restricted so that the total runoff rate from the site for the 1 in 1 year storm event is reduced to the 1 in 100-year greenfield run off rate, with a greater than 50% betterment achieved for greater storm events.
- 7.106 A pre-planning enquiry was submitted to Thames Water who confirmed there is sufficient capacity in the foul and surface water sewers to accept the proposed flows from the development.
- 7.107 In terms of Flood Risk, the proposed development lies entirely within Flood Zone 1. The proposed uses are considered 'more vulnerable' residential use at ground floor land above, with basement residential dwellings considered 'highly vulnerable'. Office and assembly space is considered 'less vulnerable'. The proposed development has been evaluated against a Sequential Test and is considered viable. All forms of flood risk have been assessed. Mitigation measures are proposed to reduce the risk of flooding from sewer sources.

j. Basement Impact Assessment

- 7.108 Chelmer Global Ltd have completed a Basement Impact Assessment of the proposed scheme, their findings conclude that the application of the proposed mitigation measures included in the accompanying BIA report and the residual impact of the proposed basement will be negligible and within acceptable limits. Please refer to the submitted BIA for further information regarding relevant policy and the schemes adherence.

k. Air Quality

- 7.109 The Haringey Development Management PDP Policy DM23 'Environmental Protection' states that development proposals should be designed to a) improve or mitigate the impact on air quality in the Borough and b) Improve or mitigate the impact on air quality for the occupiers of the building or users of the development.
- 7.110 An Air Quality Assessment has been completed by Aeolus which assessed key issues associated with the construction and operation phases of the proposed development at Braemar Avenue Baptist Church. The assessment concludes the below.
- 7.111 A qualitative assessment on the construction phase activities has been carried out. The largest risk of these activities towards dust soiling was considered to be 'Low', while that towards human health was considered to be 'Negligible'.
- 7.112 Following proposer implementation of the measures recommended in Appendix D of the report the impact of emissions during construction of the development is likely to be 'negligible' and therefore 'Not Significant'. The proposed development is considered to therefore be air quality neutral.
- 7.113 It can be concluded that the proposed development is not considered to conflict with national, regional and local planning guidance.

l. Fire

- 7.114 In accordance with the London Plan policy D12, a Fire Statement has been produced by Risk and Safety Plus and accompanies this application. The statement concludes that the development achieves the highest standard of the fire safety. Please see accompanying statement.

8.0 SUMMARY AND CONCLUSIONS

- 8.1 This statement supports a planning application made to the London Borough of Haringey for the proposed redevelopment of Braemar Avenue Baptist Church. This application has been prepared on behalf of Spacelab.
- 8.2 Braemar Avenue Baptist Church and importantly the attached corrugated iron Church Hall to the south of the Site is in an extremely dilapidated condition.
- 8.3 It is proposed to demolish the 1950's extension to the rear of the main Church building and the Church Hall, to allow the erection of a new 5 storey including basement building comprising a total of 15 units. Additionally, the building will comprise a new Church Hall and associated facilities.
- 8.4 The provision of new housing and the intensification of suitable urban and accessible sites is supported by all tiers of policy.
- 8.5 All 15 units have been designed to accord with nationally described internal space standards, and appropriate levels of private and communal external space are also provided. Each unit is provided with either a rear/front garden or balcony.
- 8.6 The proposed development will be served with 1 disabled parking space located on Braemar Avenue, provided for the 1 wheelchair accessible dwelling. The remainder of the development will be secured as car free.
- 8.7 Architecturally, the 5-storey building has been designed to complement the surrounding Victorian terrace housing and the main Church building both in plan form and character. The proposed block will be a vast improvement to the existing situation and provide much needed improved accommodation for the Church.
- 8.8 The development will result in negligible to less than substantial harm to the conservation area and the adjacent listed building. The effects of the development are considerably outweighed by the public benefits including replacement of a defunct church hall, 15 self-contained and high-quality homes, high quality architecture and landscaping.
- 8.9 The application is supported by all relevant technical documents to allow the Council to materially assess the acceptability of the proposed development.
- 8.10 For the reasons set out herein, and within the supporting documents, we respectfully request the permissions be granted.