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Development Management
Haringey Council
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For the attention of Sarah Madondo, Planning Case Officer

Dear Sarah Madondo

Planning Application Ref: HGY/2022/4553

Description: The erection of four two storey dwellings and two single storey apartments together with landscaping and other associated works at 18 Denmark Street.

I write in connection with the above planning application. I have examined the plans on detail and know the site well. While the principle of residential development on this site and the need for affordable housing – particularly housing for vulnerable people – is accepted, I wish to object strongly to the development of these dwellings in this location for a number reasons, which demonstrate how the proposals will be contrary to the NPPE, Local Plan and London Plan. These reasons are described in detail below and summarised as follows:

Reasons	Relevant policies
Impact on privacy	Development Management DPD policies DM1, DM7 and DM12; London Plan 2021 policies D3 and D6
Impact on outlook and overbearing effects	London Plan policy D3
Reduction in natural light	Development Management DPD Policy DM1; London Plan Policy D6
Increase in noise and light pollution	Development Management DPD policies DM1 and DM23; London Plan policies D3, D6, D13 and D14

Quality of housing accommodation	Haringey Strategic Policy SP2; Development Management DPD Policy DM12; London Plan Policy D6; Mayor of London Housing SPG Standard 24; Nationally Described Space Standards
Quality of amenity	NPPF Paragraph 130; Strategic policies SP2 and SP13; Development Management DPD Policy DM12; London Plan policies S4 and D6; Housing SPG Standard 26
Accessibility of development	Strategic policies SP2 and SP11; Development Management DPD Policy DM2; London Plan policies D5 and D7
Design quality	NPPF Section 12; Strategic Policy SP2; Development Management DPD policies DM2, DM7 and DM12; London Plan policies GG1, GG2, D3 and D6
Pressure on existing car parking	NPPF Paragraph 104; Development Management DPD Policy DM32
Lack of disabled parking provision	Development Management DPD Policy DM32; London Plan policies T6 and T6.1
Servicing and emergency vehicle access	London Plan policies D3, T6 and T7
Waste management	Strategic Policy SP6; Development Management DPD Policy DM4; London Plan Policy D6; Haringey Sustainable Design and Construction DPD; Housing SPG Standards 22 and 23
Fire strategy	London Plan policies D5, D11 and D12
Excessive loss of open space	Strategic Policy SP13; Development Management DPD policies DM12 and DM20; London Plan policies GGF2 and G1
Security	NPPF paragraphs 92 and 130; Strategic Policy SP11; Development Management DPD Policy DM7; London Plan Policy D11; Secured By Design: Housing guidance
Insufficient details on management, maintenance and construction	Strategic Policy SP11; Development Management DPD policies DM1 and DM21; London Plan policy T7
Lack of community consultation	NPPF paragraphs 126 and 132; Strategic policy SP0; London Plan Policy GG1
Inaccuracy of application material	NPPF Paragraph 130; Haringey Strategic Policy SP2; Development Management DPD Policy DM12; London Plan policies S4 and D6; Mayor of London Housing SPG standards 24 and 26; Nationally Described Space Standards

DETAILED REASONS FOR OBJECTIONS

1. Impact on residential amenity

1.1. Impact on privacy

- 1.1.1. **Policy DM1** of Haringey's Development Management DPD (July 2017) states, 'Development proposals must ensure a high standard of privacy and amenity for the development's users and neighbours.' It further asserts that the Council will support proposals that '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'.
- 1.1.2. **Policy DM7** of the same document states that development proposals for infill, backland and garden land sites must 'safeguard privacy, amenity, and ensure no loss of security for adjoining houses and rear gardens'.
- 1.1.3. **Policy DM12** states, 'All new housing and residential extensions must be of a high quality, taking account of the privacy and amenity of neighbouring uses.' It further notes that 'family housing on upper floors should have access to a balcony and/or terrace, subject to acceptable amenity, privacy and design considerations'.
- 1.1.4. **Policy D3** of the London Plan (2021) states that development proposals should 'deliver appropriate outlook, privacy and amenity', while **Policy D6** advises, 'The site layout, orientation and design of individual dwellings and, where applicable, common spaces should ... provide privacy and adequate daylight for residents.'
- 1.1.5. Contrary to these policies, the proposed development would neither protect the privacy of residents of the surrounding properties, nor that of the residents of the new dwellings.
- 1.1.6. While it is recognised that both Haringey's Local Plan and the London Plan adopt a flexible approach to separation distances between dwellings, in order to maximise provision of housing, this development does not safeguard the privacy of the surrounding residents because of the proposed first-floor terraces and kitchen windows facing directly onto rear gardens and elevations of the houses on Denmark Street.
- 1.1.7. What might be deemed to be acceptable separation distances between dwellings which all have living space on the ground floor must not be assumed to be acceptable where the living arrangements are inverted. A more generous allowance must be considered when living spaces are located on an upper storey, with direct sightlines towards bedrooms, as in the case of the proposed dwellings in 'Denmark Mews'. Furthermore, an upper-level terrace and kitchen window offer a superior vantage-point from which to overlook the surrounding properties. The importance of assessing the local conditions, rather than merely relying on standard separation distances, has been highlighted by the recent Supreme Court case *Fearn and others (Appellants) v Board of Trustees of the Tate Gallery*, which found that the overlooking from the Tate Modern's Blavatnik Building viewing platform represented 'a clear case of nuisance' for the residents of the adjacent NEO Bankside block, 34 m away – almost double the usually accepted separation distance of 18 m.
- 1.1.8. Pre-application feedback from Haringey's Development Management team recorded in the application's Design and Access Statement raised concerns about the separation distances from neighbouring properties, particularly those facing Denmark Street and Park Lane. These comments have not been satisfactorily addressed.

- 1.1.9. It is acknowledged that efforts have been made on the part of the designers to mitigate the impacts on privacy arising from the first-floor terraces and the kitchen windows: a perforated brick wall, with bricks arranged in a soldier course at 45-degree angles, and obscured glass to the kitchen window are claimed to provide adequate 'screening'. However, such a wall merely provides screening for the occupants of the new dwellings from the surrounding gardens; occupants of the new dwellings have clear, albeit oblique, views towards the surrounding gardens – the Design and Access Statement submitted with the application notes that the wall creates a 30% gap surface, sufficient to facilitate overlooking.
- 1.1.10. The first-floor kitchen window, while obscured, is fully openable, and since it's a kitchen window, there is a high likelihood that this window will be left open on a regular basis, offering direct views towards the properties on Denmark Street.
- 1.1.11. Furthermore, the privacy of the residents of the new dwellings is compromised by the location of a bedroom within each of Units 1–4 at ground floor and on the side of the building facing the 'street' along which the buildings are arranged, effectively offering neighbours clear views into a bedroom from an outdoor communal area.
- 1.1.12. Accordingly, the proposed development is contrary to policies DM1, DM7 and DM12 of the Development Management DPD and policies D3 and D6 of the London Plan, and the Council should not allow it.

1.2. Impact on outlook and overbearing effects

- 1.2.1. As per Policy D3 of the London Plan, above, development proposals are expected to deliver appropriate outlook. The proposal would result in loss of outlook to the residents of the surrounding dwellings and would be overbearing in scale, massing and relationship to its surroundings: the development is over-scaled and crowded within a constrained site. This will create an oppressive feel for the residents of both the surrounding properties and the development itself. The proximity of the 'mews' block to the adjacent properties, restricted areas of open space, overall width of the building when viewed from the properties along Denmark Street and Chalgrove Road, and the extent of solid walls with few small windows make the building appear overly dominant within its surroundings and claustrophobic for its occupants.
- 1.2.2. Pre-application feedback from Haringey's Development Management team referenced in the application's Design and Access Statement requests that the number of 3-bedroom dwellings be reduced from 4 to 2 and that the number of 2-bedroom homes be increased to 4. Such an arrangement would have enabled the development to be reduced from 5 blocks to 4, thus reducing the scale and massing and mitigating the impact of the development. This advice has been disregarded.
- 1.2.3. Accordingly, the proposed development is contrary to Policy D3 of the London Plan and should be resisted.

1.3. Reduction in natural light

- 1.3.1. As per Policy DM1 of Haringey's Development Management DPD, development proposals are expected to 'provide appropriate sunlight, daylight and open aspects (including private amenity space where required) to all parts of the development and adjacent buildings and land'. In addition, Policy D6 of the London Plan requires

that the design of development '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'.

- 1.3.2. Although most of the surrounding properties will likely experience only minor reduction in natural light, for some it will be noticeable, and this is borne out by the Daylight and Sunlight Report included in the application – for example, No. 49 Chalgrove Road would experience a 21% loss in Vertical Sky Component and a 29% loss in Total Sunlight Hours. My own property at No. 15 Denmark Street would experience a loss of 4.6% in Vertical Sky Component and an 8% loss in Total Sunlight Hours to a room used as an art studio (for which natural light is essential), along with a 2% loss in area receiving at least two hours of sunlight on 21 March. While this is supposedly acceptable under the BRE's guidance, this does not remove the possibility of a breach of my (or my neighbour's) Right to Light, which must consider rooms adapted for a special use requiring a higher level of sunlight.
- 1.3.3. Accordingly, the proposed development is contrary to Policy DM1 of the Development Management DPD and Policy D6 of the London Plan, and it should not be supported.

1.4. Increase in noise and light pollution

- 1.4.1. Policy DM1 of the Development Management DPD states that the Council will support proposals that 'address issues of vibration, noise, fumes, odour, light pollution and microclimatic conditions likely to arise from the use and activities of the development'. **Policy DM23** requires that proposals 'suitably demonstrate that measures will be implemented to mitigate [a potentially noisy development's] impact' and requires that a noise assessment be submitted 'if the proposed development is a noise sensitive development, or an activity with the potential to generate noise'.
- 1.4.2. Policy D3 of the London Plan states that development proposals should 'help prevent or mitigate the impacts of noise and poor air quality', while Policy D6 states, 'The site layout, orientation and design of individual dwellings and, where applicable, common spaces should [...] help reduce noise from common areas to individual dwellings'.
- 1.4.3. **Policy D13** of the London Plan states, 'New noise and other nuisance-generating development proposed close to residential and other noise-sensitive uses should put in place measures to mitigate and manage any noise impacts for neighbouring residents and businesses.' It goes on to clarify, 'Development proposals should manage noise and other potential nuisances by ensuring good design mitigates and minimises existing and potential nuisances generated by existing uses and activities located in the area' and insists, 'Boroughs should not normally permit development proposals that have not clearly demonstrated how noise and other nuisances will be mitigated and managed.'
- 1.4.4. **Policy D14** states, 'in order to reduce, manage and mitigate noise to improve health and quality of life, residential and other non-aviation development proposals should manage noise by: (1) avoiding significant adverse noise impacts on health and quality of life; (2) reflecting the Agent of Change principle as set out in Policy D13 Agent of

Change; (3) mitigating and minimising the existing and potential adverse impacts of noise on, from, within, as a result of, or in the vicinity of new development without placing unreasonable restrictions on existing noise-generating uses...’ The policy further states, ‘Development proposals that include external lighting must mitigate potential adverse impacts from such lighting. Where appropriate, proposals will be required to submit details demonstrating that external lighting is: (a) Appropriate for its purpose in its setting; (b) Designed to minimise and provide protection from glare and light spillage, particularly to sensitive receptors such as residential properties and natural habitats...’

- 1.4.5. It is self-evident that the proposed development is likely to generate significant noise and light nuisance arising from construction. Even once construction is completed, the proximity of the development’s communal seating areas to the properties along Denmark Street and the inclusion of the first-floor terraces are likely to result in a significant increase in noise and light pollution to the area. The perforated brick walls to the terrace will provide little to no noise isolation. The issue of lighting is particularly critical, as sufficient outdoor lighting will need to be provided to ensure adequate safety for residents and compliance with Secured By Design (considered further below), and this will need to be balance with minimising light pollution.
- 1.4.6. The current application has not included any commentary on construction noise or lighting, nor does it include sufficient detail of the proposed lighting and lux levels. It is, therefore, unclear whether the development will result in acceptable levels of noise and light behind the properties along Denmark Street, Park Lane, Chalgrove Road and Manor Road. Accordingly, the application has not addressed the likely increase in noise and light pollution and is thus contrary to policies DM1 and DM23 of the Development Management DPD, and policies D3, D6, D13 and D14 of the London Plan.

2. Housing quality

2.1. Accommodation

- 2.1.1. **Policy SP2** of Haringey’s Strategic Policies, 2013–2026 (‘the Local Plan’) states, ‘High quality new residential development in Haringey will be provided by ensuring that new development [...] is designed having regard to the housing design standards and space standards set out in the Mayor of London’s **Housing SPG** (March 2016)’. **Standard 24** of the Housing SPG requires that all new dwellings meet the Nationally Described Space Standard.
- 2.1.2. Policy DM12 of the Development Management DPD states, ‘All new housing and residential extensions must be of a high quality, taking account of the privacy and amenity of neighbouring uses’.
- 2.1.3. **Policy D6** of the London Plan states that housing development must provide at least the gross internal floor area (GIA) and built-in storage given in ‘Table 3.1’. These ‘Minimum internal space standards for dwellings’ are consistent with those established in the Nationally Described Space Standards.
- 2.1.4. The Nationally Described Space Standards require that a 1-bedroom, 1-person dwelling on a single storey have a minimum gross internal floor area and storage of

39 m2. For a 1-bedroom, 2-person dwelling on a single storey, a GIA of 50 m2 is required, while for a 3-bedroom, 4-person dwelling on two storeys, a GIA of 84 m2 is required.

2.1.5. The Design and Access Statement included with the application states that Units 1–4 are 3-bedroom, 4-person, 2-storey dwellings, each having 84m2 of GIA. Unit 5 is a 1-bedroom, 1-person dwelling, with a GIA of 38m2, while Unit 6 is a 1-bedroom, 2-person dwelling, with a GIA of 50m2. Based on the Nationally Described Space Standards outlined above, Units 1–4 and 6 would only just meet the minimum standards, assuming no margin of error, while Unit 5 would fall short of the standards (a GIA of 37 m2 only being acceptable in the case of a 1-bedroom, 1-person dwelling in which a shower room is provided rather than a full bathroom). GIAs are not provided on the application drawings themselves, which do not convincingly reflect the GIAs given in the Design and Access Statement. On that basis, it is unclear whether the minimum GIAs would be achieved as part of the proposals contained in the application. The application has therefore not satisfactorily demonstrated compliance with the Local Plan Policy SP2, Development Management DPD Policy DM12, London Plan Policy D6 or Nationally Described Space Standards and should be resisted.

2.1.6. Such considerations are likely to be key elements of the emerging Local Plan. This is indicated by the direction of travel laid out as part of the Corporate Delivery Plan, which identifies ‘Homes for the future’ as one of its core themes and identifies ensuring new homes are of higher quality.

2.2. Amenity

- 2.2.1. **Paragraph 130** of the National Planning Policy Framework (NPPF) states, ‘Planning policies and decisions should ensure that developments [...] create places ... which promote health and well-being, with a high standard of amenity for existing and future users[.]’
- 2.2.2. Policy SP2 of Haringey’s Strategic Policies requires that new design have regard to the housing design standards and space standards set out in the Mayor of London’s Housing SPG (March 2016). **Standard 26** of the Housing SPG specifies a minimum of 5 m2 of private outdoor space for 1–2-person dwellings and an extra 1 m2 for each additional occupant.
- 2.2.3. **Policy SP13** states, ‘All new development shall [...] provide amenity space in accordance with the Council’s Open Space and Recreational Standards Supplementary Planning Document (SPD)[.]’ It further states, ‘New development shall provide opportunities for Children’s Play Space by [...] making provision for children’s informal or formal play space in addition to amenity space provision as set out above; provide children’s informal or formal 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[.]’
- 2.2.4. Policy DM12 of Haringey’s Development Management DPD states, ‘Ground floor family housing should provide access to private garden/amenity space, and family housing on upper floors should have access to a balcony and/or terrace, subject to

acceptable amenity, privacy and design considerations, or to shared amenity space and children's play space.' It also reaffirms the private outdoor space requirements of Standard 26 of the Housing SPG.

- 2.2.5. **Policy S4** of the London Plan states, 'Development proposals for schemes that are likely to be used by children and young people should [...] (1) increase opportunities for play and informal recreation and enable children and young people to be independently mobile; (2) for residential developments, incorporate good-quality, accessible play provision for all ages. At least 10 square metres of play space should be provided per child[.]'
- 2.2.6. **Policy D6** of the London Plan reiterates the minimum requirements for outdoor amenity space, as set out in Standard 26 of the Housing SPG. It further states, in Table 3.1, that 'Private amenity space for each dwelling should be usable and have a balance of openness and protection, appropriate for its outlook and orientation.'
- 2.2.7. While the outdoor amenity space provided for most of the dwellings with the current proposal appears to satisfy the minimum standards set out in Policy D6 of the London Plan and the Mayor of London's Housing SPG, neither Unit 6 nor 18b Denmark Street appear to have any private outdoor amenity space and therefore do not comply. The quality of the private outdoor amenity provided for Units 1–4 also appears to be claustrophobic and have poor-quality outlook, with brick walls (albeit perforated) of 1.8 m or higher on three sides of the first-floor terraces, and a fence and brick wall to the east and south sides, respectively, of the ground-floor amenity area. For units purportedly intended for families, this seems wholly inadequate, especially when considered alongside the generous gardens of the surrounding houses.
- 2.2.8. As noted above, play space must be provided in addition to amenity space provision. The proposed development provides only c. 45 m² of 'communal playground' in the proposed development. Assuming these dwellings will house 8 children, the play space provision meets the minimum standard of 3 m² per child or young person. However, it does not meet the aspirational standard set by the London Plan of 10m² and stipulated by Policy SP12 of the Strategic Policies. Such basic standards for vulnerable people and children should not be supported.

2.3. Accessibility

- 2.3.1. Policy SP2 of Haringey's Strategic Policies states, 'High quality new residential development in Haringey will be provided by ensuring that [...] 90% of new housing meets Building Regulation requirement M4(2) "accessible and adaptable dwellings" and 10% [meets] Building Regulations requirement M4(3) "wheelchair user dwelling", ensuring they are designed to be wheelchair accessible or easily adaptable for wheelchair users. Units should range in size to accommodate various living needs including growing families and live-in carers.'
- 2.3.2. **Policy SP11** states, 'all development shall [...] seek the highest standards of access in all buildings and places[.]'
- 2.3.3. **Policy DM2** of Haringey's Development Management DPD states, 'Proposals should ensure that new developments can be used safely, easily and with dignity by all[.]'

- 2.3.4. **Policy D5** of the London Plan states, ‘Development proposal [*sic.*] should achieve the highest standards of accessible and inclusive design. They should [...] (3) be convenient and welcoming with no disabling barriers, providing independent access without additional undue effort, separation or special treatment; (4) be able to be entered, used and exited safely, easily and with dignity for all; (5) be designed to incorporate safe and dignified emergency evacuation for all building users.’
- 2.3.5. **Policy D7** of the London Plan reflects the requirements set out in Policy SP2 of the Strategic Policies, aiming ‘to provide suitable housing and genuine choice for London’s diverse population, including disabled people, older people and families with young children, residential development must ensure that: (1) at least 10 per cent of dwellings (which are created via works to which Part M volume 1 of the Building Regulations applies) meet Building Regulation requirement M4(3) “wheelchair user dwellings”; (2) all other dwellings (which are created via works to which Part M volume 1 of the Building Regulations applies) meet Building Regulation requirement M4(2) “accessible and adaptable dwellings”.’
- 2.3.6. Paragraph 2.2 of Building Regulations Part M(2) states, ‘The principal private entrance ... should comply with all of the following: (d) the door has a minimum clear opening width of 850mm [...]; (f) a minimum 300mm nib is provided to the leading edge of the door[.]’ Paragraph 2.24 states, ‘to provide usable living spaces and easy, step-free access between a living area, a WC and the principal private entrance, key accommodation should comply with the following: within the entrance storey there is a living area (which may be a living room, dining room or a combined kitchen and dining room.’
- 2.3.7. The inverted arrangement within the proposed 3-bedroom dwellings, with living spaces on the upper floors, and the fact that two of the proposed flats (18b and Unit 5) are contained entirely on the first floor, with no lift access provided, demonstrates that the majority of the proposed dwellings cannot comply with Building Regulations Part M(2), which requires provision of living space within the entrance storey. This is despite the fact that the Design and Access Statement claims to be achieving the required Part M(2) regulations for all units and Part M(3) standards for 18a. Furthermore, none of the entrance doors to any of the units – not even those to 18a – satisfy the minimum dimensions stipulated by Building Regulations Part M(2), which requires a minimum clearance of 850 mm, with minimum 300-mm nibs to leading edges.
- 2.3.8. Therefore, the proposed development does not comply with Building Regulations Part M, nor does it achieve the highest standards of accessible and inclusive design. It is therefore contrary to policies SP2 and SP11 of Haringey’s Strategic Policies; Policy DM2 of the Development Management DPD; and policies D5 and D7 of the London Plan.
- 2.3.9. Compliance with these policies relating to accessibility is particularly sensitive, given the location of the development within Northumberland Park ward, which is an area in which people with disabilities are disproportionately represented: according to 2011 Census data (at the time of writing, relevant 2021 Census data has not yet been published), more than one in five residents in Northumberland Park has a limiting, long-term health problem or disability (21.4%). This is substantially higher than the

rate seen in Haringey (16.7%) and London (16.4%) more widely. (Refer also to Haringey's own Ward Profile for Northumberland Park.) Accordingly, the application should be refused.

3. Design quality

- 3.1.1. **Section 12** of the NPPF stresses the importance of good design, in order to ensure developments are sustainable and will fulfil the needs of current and future generations. In particular, Paragraph 130 offers key criteria for ensuring design quality, including being visually attractive and sympathetic to local character, and establishing a strong sense of place.
- 3.1.2. Policy SP2 of Haringey's Strategic Policies states, 'all development shall [...] be of the highest standard of design that respects its local context and character and historic significance, to contribute to the creation and enhancement of Haringey's sense of place and identity'.
- 3.1.3. Policy DM2 of the Development Management DPD states, 'All new development and changes of use must achieve a high standard of design and contribute to the distinctive character and amenity of the local area. The Council will support design-led development proposals which meet the following criteria: (a) Relate positively to neighbouring structures, new or old, to create a harmonious whole; (b) Make a positive contribution to a place, improving the character and quality of an area; [...] (d) Demonstrate how the quality of the development will be secured when it is built [...] Development proposals should relate positively to their locality, having regard to: [...] (b) Form, scale & massing prevailing around the site; (c) Urban grain, and the framework of routes and spaces connecting locally and more widely; [...] (e) Rhythm of any neighbouring or local regular plot and building widths; (f) Active, lively frontages to the public realm; and (g) Distinctive local architectural styles, detailing and materials.
- 3.1.4. Policy DM7 of the Development Management DPD states, 'Development proposals for infill, backland and garden land should meet the requirements of Policies DM1 and DM2 and must: (a) Relate appropriately and sensitively to the surrounding area as well as the established street scene, ensuring good access and where possible, retaining existing through routes; (b) Provide a site specific and creative response to the built and natural features of the area[.]'
- 3.1.5. Policy DM12 of the Development Management DPD states, 'Extensions or alterations to residential buildings, including roof extensions 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 such as chimneys, and porches.'
- 3.1.6. **Policy GG1** of the London Plan states, 'Good growth is inclusive growth ... those involved in planning and development must [...] ensure that new buildings and the spaces they create are designed to reinforce or enhance the identity, legibility, permeability, and inclusivity of neighbourhoods, and are resilient and adaptable to changing community requirements'.

- 3.1.7. **Policy GG2** states, ‘those involved in planning and development must [...] understand what is valued about existing places and use this as a catalyst for growth, renewal, and place-making, strengthening London’s distinct and varied character’.
- 3.1.8. Policy D3 states, ‘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 (as set out in Policy D2 Infrastructure requirements for sustainable densities), and that best delivers the requirements set out in Part D.’ It clarifies, ‘Development proposals should: (1) enhance local context by delivering buildings and spaces that positively respond to local distinctiveness through their layout, orientation, scale, appearance and shape, with due regard to existing and emerging street hierarchy, building types, forms and proportions; [...] (6) provide active frontages and positive reciprocal relationships between what happens inside the buildings and outside in the public realm to generate liveliness and interest; [...] (11) respond to the existing character of a place by identifying the special and valued features and characteristics that are unique to the locality and respect, enhance and utilise the heritage assets and architectural features that contribute towards the local character’.
- 3.1.9. Policy D6 identifies a series of ‘key qualitative aspects’ that ‘should be addressed in the design of housing developments’. Among these, it includes a requirement that ‘the built form, massing and height of the development should be appropriate for the surrounding context’.
- 3.1.10. The design of the proposed development is in conflict with this suite of policies: it does not represent the most appropriate form for the site and neither enhances nor enriches the built environment. By virtue of seeking to maximise the quantum of built forms on the site, the proposal totally disregards what is valued about the existing area – including the open character of the site – and the site’s capacity for growth. It also introduces several new dwellings without active frontages, all of which face onto rear elevations only.
- 3.1.11. The proposals evidence only minimal consideration of the local context, character, identity, legibility or sense of place of the site’s surroundings. They do not relate positively, appropriately or sensitively to neighbouring structures or surrounding area and reflect their surroundings in materials and building heights alone. The proposed designs demonstrate little regard for the form, proportion, layout, scale, massing, urban grain, rhythm of neighbouring plots and building widths, or street hierarchy of the surrounding townscape. Such considerations are particularly critical in the context of a backland site, as stipulated by Policy DM7 of the Development Management DPD.
- 3.1.12. The proposed name of the development – ‘Denmark Mews’ – is an empty gesture: mews blocks were modest in scale and clearly ancillary to the houses with which they were associated. By contrast, the proposed development is of significantly greater scale than the building at 18 Denmark Street or any of the surrounding

houses. The awkward route through the existing building at 18 Denmark Street is contrary to the established pattern of streets and paths in the area and the rhythm of narrow neighbouring plots, in which terraced housing with regular and generous garden plots, and active, lively frontages line a prevailing grid pattern of streets.

- 3.1.13. Moreover, the proposed development largely ignores the predominant terrace typology: its scale and massing is not reflective of the established pattern of the surrounding houses, which typically comprise an elongated rectangular core with narrow, pitched-roof closet wing to the rear. This traditional arrangement, coupled with a classically proportioned pattern of fenestration, illustrates a sensitive hierarchical relationship between ground and first floors, while providing relief from the massing of the terrace, concentrating bulk at the lower level and adding visual interest.
- 3.1.14. By contrast, the proposed blocks to Denmark Mews are monumental and simplistic in their massing and proportions, with large, overbearing expanses of solid masonry, punctuated by disproportionately small windows and harsh rectilinearity. The proposed inverted layout of the 3-bedroom dwellings is a perversion of the traditional arrangement of the surrounding houses, which represent a clear distinction between public and private rooms (serving both a practical as well as a hierarchical function).
- 3.1.15. In addition, the extension to the existing building at No. 18 Denmark Street does not respect or complement the detailing of the original building due to the wholesale removal of the chimneystack, a distinctive feature of the Victorian terraces that line Denmark Street, Park Lane and Manor Road, which adds character and visual interest and contributes towards ensuring the building is well integrated with the rest of the terraces.
- 3.1.16. Finally, and importantly, the application proposals do not demonstrate how any quality of development will be secured when the development is built. The application materials are general and non-specific, and no detail is provided with regard to maintenance of the building or a management strategy for a registered provider (or even confirmation of any agreement with a registered provider).
- 3.1.17. Accordingly, the proposed development is contrary to Section 12 of the NPPF; Policy SP2 of Haringey's Strategic Policies; policies DM2, DM7 and DM12 of the Development Management DPD; and policies GG1, GG1, D3 and D6 of the London Plan.

4. Transport

4.1. Pressure on existing on-street parking

- 4.1.1. **Paragraph 104** of the NPPF states, 'Transport issues should be considered from the earliest stages of plan-making and development proposals, so that: (a) the potential impacts of development on transport networks can be addressed; [...] (e) patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places.'
- 4.1.2. **Policy DM32** of the Development Management DPD states, 'The Council will support proposals for new development with limited or no on-site parking where: [...] a

Controlled Parking Zone (CPZ) exists or will be provided prior to the occupation of the development[.]’

- 4.1.3. Despite the conclusions of the application’s Transport Statement, this development will have an adverse effect on parking pressure. Insufficient consideration has been given to the impacts of the development of the surrounding area and residents, and no measures have been adopted to mitigate any adverse effects. The Transport Statement notes that the area is subject to a CPZ; however, it does not consider the fact that this CPZ only applies on Tottenham Hotspur event days, which occur only once a fortnight on average. At all other times, there are no restrictions on parking in the area.
- 4.1.4. Furthermore, the Transport Statement has arbitrarily assessed current demand for parking on two weekdays but has, conversely, not considered the increased pressure that occurs on Tottenham Hotspur match days, when the closure of Park Lane pushes its residents to park on adjacent streets, or indeed on Sundays, when attendance at Ministry of Praise church, on the corner of Manor Road and Denmark Street, heightens demand for parking. This will put stress on existing local residents.
- 4.1.5. Accordingly, the application is contrary to the NPPF and Policy DM32 of the Development Management DPD.

4.2. Lack of disabled parking provision

- 4.2.1. **Policy DM32** of the Development Management DPD states, ‘The Council will support proposals for new development with limited or no on-site parking where: [...] parking is provided for disabled people [...]’. The policy further notes, ‘Development proposals will be assessed against the car parking and cycle parking standards set out in the London Plan.’
- 4.2.2. **Policy T6** of the London Plan states that ‘Appropriate disabled persons parking for Blue Badge holders should be provided as set out in Policy T6 .1 Residential parking.’ **Policy T6.1** of the London Plan confirms, ‘Disabled persons parking should be provided for new residential developments.’
- 4.2.3. The proposed development incorporates no on-site parking provision or consideration of on-street parking, despite the fact that the proposals claim that the entire development will be Building Regulation Part M(2) compliant, and the dwelling at 18a is proposed to be a fully wheelchair-accessible dwelling, compliant with Building Regulations Part M(3). Given that there is already a disabled parking bay on Denmark Street, a short street with only limited capacity, provision of the requisite disabled parking bay for the new development ought to be carefully considered, but the application proposals demonstrate that this has not been the case. The proposals therefore do not comply with Policy DM32 of the Development Management DPD or policies T6 and T6.1 of the London Plan.

4.3. Servicing and emergency vehicle access

- 4.3.1. **Policy D3** of the London Plan states, ‘Development proposals should [...] facilitate efficient servicing and maintenance of buildings and the public realm, as well as deliveries, that minimise negative impacts on the environment, public realm and vulnerable road users.’ Policy D5 states, ‘Development proposal [*sic.*] should [...] be

designed to incorporate safe and dignified emergency evacuation for all building users.'

- 4.3.2. Policy T6 of the London Plan advises that 'adequate provision should be made for efficient deliveries and servicing and emergency access', while **Policy T7** states, 'Development proposals should facilitate safe, clean, and efficient deliveries and servicing. Provision of adequate space for servicing, storage and deliveries should be made off-street, with on-street loading bays only used where this is not possible.'
- 4.3.3. No vehicular access is possible to the proposed dwellings on 'Denmark Mews'. Access is exclusively through the existing terraced house. The efficiency of deliveries will be compromised and access for emergency personnel will be convoluted, thereby putting residents at risk. Therefore, the proposed development conflicts with policies D3, T6 and T7 of the London Plan.

5. Waste management

- 5.1.1. **Policy SP6** of Haringey's Strategic Policies states, 'The Council shall [...] require integrated, well-designed recycling facilities to be incorporated into all new developments.' It further states, 'new waste management facilities will be required to take into account and minimise pollution and nuisance issues.'
- 5.1.2. **Policy DM4** of the Development Management DPD states, 'All proposals should consider how to sustainably manage waste arising from the development during the design, construction and occupation phases of new developments.' It further states, 'All proposals will be required to make on-site provision for general waste, the separation of recyclable materials and organic material for composting. The on-site provision must: (a) Ensure adequate dedicated internal and external storage space to manage the volume of waste arising from the site; (b) Provide accessible and safe access to onsite storage facilities, both for occupiers and collection operatives, including vehicles, having regard to the Council's Refuse Collection Strategy; (c) Be located and screened to avoid nuisance and adverse impact on visual and other amenity to occupiers and neighbouring uses, and are within the maximum permitted carrying and reversing distances [...]'
- 5.1.3. Haringey's **Sustainable Design and Construction DPD** details the specific local requirements for waste collection. It advises that each dwelling should have 1no. 240L wheelie bin for refuse; 1no. 240L wheelie bin for dry recycling; 1no. food waste bin; and 1no. garden waste sack. For developments comprising multiple dwellings, 1100L bulk waste containers may be used for communal waste collection in place of the 240L wheelie bins. In such cases, 1no. 1100L bulk waste container for refuse is required for every 6 dwellings, and 1no. 1100L bulk waste container for dry recycling is required for every 10 dwellings.
- 5.1.4. The Sustainable Design and Construction DPD also requires 'Wheelie bins to be located no further than 25 metres from the point of collection' and 'Bulk waste containers to be located no further than 10 metres from the point of collection.' It further notes, 'Route from waste storage points to collection point must be as straight as possible with no kerbs or steps.' In addition, 'If access through security gates/doors is required for household waste collection, codes, keys, transponders or any other type of access equipment must be provided to the council.' Also,

‘Adequate waste storage arrangements must be made so that waste does not need to be placed on the public highway other than immediately before it is due to be collected.’

- 5.1.5. **Policy D6** of the London Plan states, ‘The development should ensure that recycling and waste disposal, storage and any on site management facilities are convenient in their operation and location, appropriately integrated, and designed.’
- 5.1.6. The Mayor of London’s Housing SPG **Standard 22** states, ‘Communal refuse and recycling containers, communal bin enclosures and refuse and recycling stores should be easily accessible to all residents including children and wheelchair users, and located on a hard, level surface. The location should satisfy local requirements for waste collection. Refuse and recycling stores within buildings should be located to limit the nuisance caused by noise and smells and maintained to a high hygiene standard.’ **Standard 23** states, ‘Storage facilities for waste and recycling containers should be provided in accordance with local authority requirements and meeting at least British Standard BS5906:2005 Code of Practice for waste management in Buildings.’
- 5.1.7. **British Standard BS5906:2005 Code of Practice for waste management in Buildings** reiterates much of the guidance in Haringey’s Sustainable Design and Construction DPD. It additionally notes, ‘The distance collectors should have to cover in respect of transporting waste containers to and from the collection vehicle should be minimized to achieve an economical service. [...] The collector should not normally be required to carry individual waste containers (Manual Handling Regulations 1992 [4] and Getting to Grips with Manual Handling [12]), or move two-wheeled containers, for a distance of more than 15 m, nor to manoeuvre four-wheeled waste storage containers from the storage points to collecting vehicles for a distance of more than 10 m. Where bulk containers are used, direct vehicular access to the containers is necessary. The collectors should not be required to move wheeled waste storage containers over surfaces that may hinder the smooth passage of the container. An adjacent storage area designed to not block the pavement should be provided where a large number of households use the same collection point.’
- 5.1.8. It is evident, based on the guidance above, that the proposal is unrealistic in its expectations for satisfactory waste management on the basis of the provision included. It allows for 4no. 240L wheelie bins, along with food and garden waste storage within the ‘undercroft’ for flats 18a and 18b. This is an acceptable level of provision, and the bins are easily manoeuvrable by either collectors or residents.
- 5.1.9. Units 1–6, however, are provided with two 1100L bulk waste containers, one each for refuse and dry recycling, alongside food and garden waste storage. This provision is adequate on the basis of Haringey’s guidance. However, enclosures for the bulk waste containers are located 30 m from the entrance to the undercroft (itself approximately 2 m from the street) – far exceeding the 10-m limit stipulated by both Haringey’s guidance and British Standard BS5906:2005 for collectors to transport refuse containers. Furthermore, British Standard BS5906:2005 goes as far as to specify that direct vehicular access is required for collection of bulk waste containers like those proposed. (The alternative would be to provide 2no. 240L wheelie bins, plus storage for food and garden waste for each of the six dwellings. This would

result in 12 no. wheelie bins, plus food and garden waste storage, which would be impossible to accommodate within the limited constraints of the site.)

5.1.10. Importantly, pre-application advice from Council advised that a refuse store should be included within 10 m of Denmark Street. This advice has been unheeded.

5.1.11. It is therefore evident that the proposed refuse storage does not comply with the requirements under Strategic Policy SP6, Development Management DPD Policy DM4 or London Plan Policy D6, and should be refused. The waste management provision as proposed would inevitably lead to missed collections and overflowing bins, which will attract vermin and lead to fly-tipping in an area already plagued by fly-tipping, thus threatening the health and wellbeing of both the residents of the development and those of the surrounding properties.

6. Fire strategy

6.1.1. Policy D5 of the London Plan states, 'Development proposal [*sic.*] should [...] be designed to incorporate safe and dignified emergency evacuation for all building users.'

6.1.2. **Policy D11** states, 'Development proposals should maximise building resilience and minimise potential physical risks, including those arising as a result of extreme weather, fire, flood and related hazards.'

6.1.3. **Policy D12** relates to fire safety, stating, 'In the interests of fire safety and to ensure the safety of all building users, all development proposals must achieve the highest standards of fire safety and ensure that they (1) identify suitably positioned unobstructed outside space [...] appropriate for use as an evacuation assembly point [...] (4) provide suitable and convenient means of escape, and associated evacuation strategy for all building users.'

6.1.4. Although not explicitly a material planning consideration, **Building Regulations Part B** represents a useful benchmark to ensure compliance with London Plan policies D5, D11 and D12 and thus achieve the 'highest standards of fire safety'. Requirement B1 of the Building Regulations states, 'The building shall be designed and constructed so that there are ... appropriate means of escape in case of fire from the building to a place of safety outside the building capable of being safely and effectively used at all material times.'

6.1.5. In addition, it should be noted that British Standard BS5906:2005 Code of Practice for waste management in Buildings (compliance with which is specified under Standard 23 of the Housing SPG) requires that consultation with the local fire brigade be carried out. It is noted that the London Fire Brigade appears neither to have been consulted by the applicant, nor by the Council as part of its consultations.

6.1.6. While the proposal makes provision for a dedicated fire main within the site, no commentary is provided regarding means of escape from the dwellings. Access to most of the site is afforded exclusively through a narrow, covered entrance within an existing terraced house. Accordingly, there is no alternative means of escape should the existing entrance be impassable due to a fire and no possibility of a fire truck (or ambulance) being able to enter the site. The proposal is therefore contrary to the London Plan, by virtue of not being compliant with British Standard BS5906:2005

Code of Practice for waste management in Buildings and, by extension, not compliant with the Housing SPG; it is also not compliant because it does not provide the 'highest standards of fire safety', as instructed by Policy D12, nor does it provide satisfactory emergency access, as required by policies D5 and D11.

7. Excessive loss of green space and impact on trees

- 7.1.1. **Policy SP13** of the Strategic Policies states, 'New development shall protect and improve Haringey's parks and open spaces. All new development shall protect and enhance, and when and where possible, extend the existing boundaries of the borough's [...] other open spaces from inappropriate development; [...] secure improvements, enhancement and management in both quality and access to existing green spaces; [...] seek to secure opportunities for additional publicly accessible open space especially in those identified areas of Open Space deficiency e.g. in the east of the borough where the quality and amount of provision is poorer[.]'
- 7.1.2. It further states, 'All development shall protect and improve sites of biodiversity and nature conservation, including private gardens through its protection, management and maintenance of existing trees and the planting of new trees where appropriate'.
- 7.1.3. Policy DM7 of the Development Management DPD states, 'There will be a presumption against the loss of garden land unless it represents comprehensive redevelopment of a number of whole land plots.'
- 7.1.4. Policy DM12 of the Development Management DPD states, 'In areas of especially poor residential environmental quality, development proposals should seek to include enhanced provision of green infrastructure, including the quantity and quality of landscaped areas, tree provision and, where the site allows, the provision of additional open space.'
- 7.1.5. Figure 4.2 within the Development Management DPD shows 'Wards of Open Space Deficiency'. This plan identifies Northumberland Park Ward, where the site is located, as a ward 'without enough Open Space'. (Note that an updated assessment of Open Space Deficiency is yet to be published for the revised Northumberland Park ward boundaries.) The Development Management DPD defines 'Open Space' as 'All land in London that is predominately undeveloped other than by buildings or structures that are ancillary to the open space use. The definition covers the broad range of types of open space within London, whether in public or private ownership and whether public access is unrestricted, limited or restricted.'
- 7.1.6. **Policy DM20** states, 'The reconfiguration of open space will be supported where [...] (b) There would be no net loss of open space; (c) it would achieve enhancements to address identified deficiencies in the capacity, quality and accessibility of open space[.]' It further states, 'Proposals for ancillary development on open space will be supported where they [...] (c) are ancillary to the use(s) of the open space; (d) are of an appropriate scale; (e) do not detract from the open character of the site or surroundings; (f) contribute positively to the setting and quality of the open space.'
- 7.1.7. Policy GG2 of the London Plan states, 'To create successful sustainable mixed-use places that make the best use of land, those involved in planning and development must [...] protect and enhance London's open spaces ... and promote the creation of

new green infrastructure and urban greening, including aiming to secure net biodiversity gains where possible[.]’

- 7.1.8. **Policy G1** states, ‘London’s network of green and open spaces, and green features in the built environment, should be protected and enhanced. Green infrastructure should be planned, designed and managed in an integrated way to achieve multiple benefits.’
- 7.1.9. The proposed development would see a c. 700m² area of open green space almost entirely covered over with buildings and hardstanding. While the loss of some open space is unavoidable in order to maximise opportunities to provide much-needed housing, this must be balanced with the need to retain a quantum of open space in a heavily built-up area with little greenery, and one that has already been identified by the Council as lacking in open space.
- 7.1.10. The proposed development would neither protect nor improve the existing open space between Denmark Street and Chalgrove Road; it would result in the net loss of open space. In addition, the development would not be ancillary to the open space, nor would it be of an appropriate scale for the constrained conditions of the site, as explained in section 1, above. It would detract from the open character of the site surroundings and would not harm the quality of the open space. As noted in Policy DM7 of the Development Management DPD, there should be a presumption against the loss of garden land unless it represents comprehensive redevelopment of a number of whole land plots – the development of this site represents redevelopment of a single plot, which is actually a remnant of a historically larger plot.
- 7.1.11. While it could be argued that the existing garden site is ancillary to the existing building at 18 Denmark Street, and therefore would not be subject to the requirements set out in Policy DM20, it is clear by the lack of care and maintenance of the site that it has not been used for any ancillary purpose for many years and is effectively independent in its function. Furthermore, the history of the site – as described in the Design and Access Statement – would seem to suggest that the site has a historical connection with the plots along Chalgrove Road, rather than with No. 18 Denmark Street, as it formed part of a nursery that once existed here and was accessed from Chalgrove Road. The area of the site is also far larger than that of the historical plot for No. 18 Denmark Street, further reinforcing the characterisation of the site as being independent of No. 18 Denmark Street.
- 7.1.12. The application proposes development that will require the removal of existing mature trees and laying of foundations within the root protection areas of retained trees, without providing details of how the roots will be protected. The Arboricultural Impact Assessment claims some of the surrounding mature trees are dying and would need to be removed; however, the vast majority of these are located within the gardens of adjacent plots and outside the ownership and control of the applicant. Furthermore, while the Biodiversity Assessment states that there is no evidence of protected species within the site, this does not preclude the possibility of the site becoming a habitat for protected species in the future – especially in view of the proximity of the Tottenham Marshes and the Walthamstow Wetlands and the proactive conservation work that has taken place there in the last

few years. (In fact, waterfowl are regularly heard and seen flying in the area around the site.)

- 7.1.13. Accordingly, the proposed development does not accord with Policy SP13 of the Strategic Policies; policies DM7, DM12 and DM20 of the Development Management DPD; and policies GG1 and G1 of the London Plan, and should be resisted.

8. Security

- 8.1.1. NPPF **Paragraph 92** states, 'Planning policies and decisions should aim to achieve healthy, inclusive and safe places which [...] are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of attractive, well-designed, clear and legible pedestrian and cycle routes, and high quality public space, which encourage the active and continual use of public areas[.]
- 8.1.2. **Paragraph 130** states, 'Planning policies and decisions should ensure that developments [...] create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.'
- 8.1.3. Policy SP11 of Haringey's Strategic Policies states, 'All new development should enhance and enrich Haringey's built environment and create places and buildings that are high quality, attractive, sustainable, safe and easy to use. To achieve this all development shall incorporate solutions to reduce crime and the fear of crime, such as promoting social inclusion; creating well-connected and high quality public realm that is easy and safe to use; and by applying the principles set out in "Secured by Design" and Safer Places'.
- 8.1.4. Policy DM7 of the Development Management DPD states, 'There will be a presumption against the loss of garden land unless it represents comprehensive redevelopment of a number of whole land plots.' It further states, 'development proposals for infill, backland and garden land [...] must [...] (c) where appropriate, repair or re-provide street frontages and provide additional passive surveillance and increased security; (d) safeguard privacy, amenity, and ensure no loss of security for adjoining houses and rear gardens; [...] (g) not result in 'gated' developments that prevent access which would normally be provided by a publicly accessible street.'
- 8.1.5. Policy D11 of the London Plan states, 'Development should include measures to design out crime ... These measures should be considered at the start of the design process to ensure they are inclusive and aesthetically integrated into the development and the wider area.'
- 8.1.6. **Paragraph 13.1** of the Secured By Design: Housing guidance, referenced in Policy SP11 above, states, 'Research studying the distribution of burglary in terraced housing with open rear access footpaths has shown that up to 85% of entries occurred at the back of the house.'
- 8.1.7. **Paragraph 18.2** states, 'Bollard lighting is purely for wayfinding and can be easily obscured. It does not project sufficient light at the right height making it difficult to

recognise facial features and as a result causes an increase in the fear of crime. It should be avoided.'

- 8.1.8. The link between crime and back alleys is well established, as confirmed by Paragraph 13.1 of the Secured By Design guidance. The site is currently only accessible to the residents of No. 18 Denmark Street. This development will see an exponential increase in the number of people accessing the site, and thus to the rear gardens of the surrounding properties. Bollard lighting is proposed to the footpath linking the entrances to the 'Denmark Mews' dwellings, which is explicitly discouraged in the Secured By Design guidance.
- 8.1.9. The circumstances created by the proposed development will be detrimental to sense of security of the residents of the surrounding properties, particularly in an area with a high rate of crime – the rate of crime in Northumberland Park is 18% above London levels and third highest in Haringey, according to the Metropolitan Police. (See Haringey's Ward Profile, 2020.) No mitigation is offered in the application material to alleviate residents' fear of increased crime from the development. Nor has any effort been made on the part of the applicant to carry out engagement with the local community to secure the social inclusion of the residents of the development, who will be isolated from their neighbours by being confined to a gated development. The proposal thus conflicts with the NPPF; Policy SP11 of the Strategic Policies; policies DM7 and DM11 of the Development Management DPD; and Secured By Design guidance.

9. Insufficient details on management, maintenance and construction

- 9.1.1. Policy SP11 of the Strategic Policies states, 'all development shall ensure impacts on health, climate change, natural resources and biodiversity are minimised by adopting and improving sustainable design and construction techniques[.]'
- 9.1.2. Policy DM1 of the Development Management DPD states, 'The Council will support design-led development proposals which [...] are inclusive and incorporate sustainable design and construction principles.'
- 9.1.3. **Policy DM21** states, 'All new development, including building and landscape works, will be expected to consider and implement sustainable design, layout and construction techniques.' It further states, 'Proposals that fail to demonstrate adequate consideration for sustainable design, layout and construction techniques will be resisted.'
- 9.1.4. Policy T7 of the London Plan states, 'Construction Logistics Plans and Delivery and Servicing Plans will be required and should be developed in accordance with Transport for London guidance and in a way which reflects the scale and complexities of developments.'
- 9.1.5. No details about how the construction of the development will be managed or even achieved given the restrictions on access to the site are provided in the application material. Nor is any information given on minimising traffic disruption and noise impacts and safeguarding privacy. Furthermore, no details of tree protection measures are provided. Nor is a management strategy for a Registered Provider

included, which while not a material planning consideration, does call into question the feasibility of the scheme.

- 9.1.6. The proposals are therefore in conflict with Policy SP11 of the Strategic Policies; policies DM1 and DM21 of the Development Management DPD; and Policy T7 of the London Plan, and should be resisted.

10. Lack of community consultation

- 10.1.1. The NPPF stresses the importance of community consultation as part of the design process for development proposals. **Paragraph 126** emphasises not only the critical role of good design in sustainable development, but that of effective engagement with communities. **Paragraph 132** states, 'Early discussion between applicants, the local planning authority and local community about the design and style of emerging schemes is important for clarifying expectations and reconciling local and commercial interests. Applicants should work closely with those affected by their proposals to evolve designs that take account of the views of the community. Applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot.'
- 10.1.2. The NPPF's priorities in terms of community engagement are echoed in those of the London Plan, Policy GG1 of which states, 'Good growth is inclusive growth. To build on the city's tradition of openness, diversity and equality, and help deliver strong and inclusive communities, those involved in planning and development must encourage early and inclusive engagement with stakeholders, including local communities, in the development of proposals, policies and area-based strategies.'
- 10.1.3. Although the importance of community engagement is not stressed in Haringey's current development plan, it is a key theme both of the Council's Labour Manifesto and recently published draft Corporate Delivery Plan. The first theme of the Corporate Delivery Plan, 'Resident experience, collaboration and participation', emphasises the importance of involving local residents in decision-making.
- 10.1.4. Based on the precedent of the NPPF, the London Plan and the Haringey Corporate Delivery Plan, it is to be expected that community engagement will be a critical part of the planning process in Haringey going forward and will be stipulated in the policies contained within the emerging Local Plan. It therefore follows that community engagement is critical to ensuring sustainable development, in accordance with **Policy SP0** of Haringey's Strategic Policies.
- 10.1.5. It is noteworthy that the applicant has not initiated any form of engagement or consultation with neighbours or other members of the local community. Not only would this have resulted in a higher-quality and more acceptable scheme, but several areas of uncertainty and inaccuracies in the application material could have been addressed.
- 10.1.6. The proposals are, therefore, contrary to the NPPF and Policy GG1 of the London Plan. They do not represent 'sustainable development' and thus do not accord with Policy SP0 of the Strategic Policies. In the absence of adopted specific local planning policies requiring community consultation, the proposal should not be allowed.

11. Inaccuracy of application material

- 11.1.1. The application material includes a number of inconsistencies and inaccurate information; it is confusing, contradictory and misleading. The inaccuracy of the information contained within the application materials in terms of dwelling sizes and dimensions and compliance with Building Regulations has already been raised. So too has the lack of detailed construction information. One fundamental inaccuracy to which the Council's attention should be drawn is the inaccuracy of the site boundary shown in the application material. The boundary shown infringes on a number of properties, as shown in the accompanying 'Land Boundary Infringement at 15 Denmark Street' report.
- 11.1.2. Although 'boundary disputes' are acknowledged to be a civil matter and not a material planning consideration, compliance with minimum room sizes, GIAs and outdoor amenity space is a material planning consideration. The extent to which the boundary shown infringes on land owned by adjacent properties – 2.86 m² in the case of No. 15 Denmark Street – materially affects the feasibility of the entire scheme. To that extent, it could not be considered 'sustainable development' and would be contrary to the NPPF and Policy SP0 of the Strategic Policies.

12. Conclusion

- 12.1.1. At the core of both the NPPF and Haringey's Local Plan is a 'presumption in favour of sustainable development'. As detailed above, by virtue of impacts on privacy; impacts on outlook and overbearing effects; reduction in natural light; likely increase in noise and light pollution; quality of housing accommodation and amenity; accessibility; design quality; parking and traffic impacts; waste management; fire strategy; loss of open space; security issues; lack of details of management, maintenance and construction; and lack of community consultation, the proposed development is contrary to both the NPPF and the Local Plan, particularly Policy SP0 of the Strategic Policies.
- 12.1.2. However, as noted previously, the principle of residential development on the site is accepted. It is recommended that any potential development on the site should be smaller in scale and more proactively seek to provide the highest quality of residential accommodation and reflect the prevailing character of the area, including the openness of the site, while making adequate provision for refuse and access for emergency services.

Sincerely,

Camilla Gersh

15 Denmark Street