



Pre-Application Planning Advice Note

Ref: PRE/2021/0066

Site Address: Braemar Avenue Baptist Church, Braemar Avenue, N22

Proposal:

Demolition of the existing church hall, to allow construction of a part 3, part 4 storey building (over basement) comprising new church hall extensions (206m²) and 15 flats. Internal and minor external alterations to adjacent listed church, together with landscaping improvements. It is proposed to provide a new/replacement church hall and entrance as part of this redevelopment.

Submitted Documents: The submitted documents for the pre-app response that were revised on 22 February 2021 are 1802-035, 036, 037, 038, 039, 040, 054, 056, 057, 059, 060, 063, 070

Meeting Date: 05/02/2021

Attendees: Valerie Okeiyi (Planning Officer); John McRory (Team Leader); Richard Truscott (Urban Design Officer), Elisabetta Tonazzi (Conservation Officer); Maurice Richards (Transport Planner)

Summary of Council's response

Overall RAG Rating	Reason for rating
	The following comments are be read in conjunction with the first pre-application meeting reference PRE/2019/0178 held on 10th September 2018 reference and the second pre-application meeting reference PRE/2019/0250 held on 20th January 2020 taking into consideration the new London Plan adopted March 2021 Officers broadly support the principle of the proposal in land use terms. The developers must provide a robust justification as to why the loss of tree 'T13' is acceptable as this tree has been identified as a particularly good specimen and potentially worthy of a TPO. The scheme presented at the pre-application meeting appears to have only addressed the previous design and conservation concerns in-part. The design language to the front, rear and flank façade of the building requires further refinement. The developer will need to agree locations for verified views with officers, so to ensure that this concept is successful in visual terms. In terms of housing quality, it is clear that the internal layout has been improved, although further refinements to the layout of some of the flats is recommended. It would be preferable if the family sized units could be located on the ground floor or top floor, where they would have access to larger amenity space. The scheme provides a good mix of units which is appropriate for the site. There is still no information about the level of affordable housing that is to be proposed. This is required but officers accept that the level will be determined as part of a viability assessment. The design of any scheme should consider the potential level of impact on the amenity of the surrounding occupiers and residents of existing properties, particularly the adjacent terrace houses on Braemar Avenue.

From the transportation perspective the uplift in transport demand will be from the new residential development however the applicant will need to detail if there will be any uplift in church attendance or activities. Whilst the site has excellent accessibility to public transport services, it will be appropriate to assess the potential parking demand impacts and a parking stress survey will be required, and it is also suggested car club provision be made for the

London Plan Policy D12 requires development proposals to achieve the highest standards of fire safety and all major development proposals should be submitted with a Fire Statement, which is an independent fire strategy, produced by a third party, suitably qualified assessor.

Next Steps/recommendations

The proposal would be suitable for a Planning Performance Agreement, further details can found on the Council's website. Following the agreement of a PPA, the scheme would be put before a Development Management Forum, the Quality Review Panel, and would be presented to a Planning Committee Pre-Application meeting.

Review of Submitted Proposal

The assessment of the proposal submitted uses a RAG rating system (see below). Comments are provided on the reasons for the rating given.

Red = This element of the scheme is not currently considered to be acceptable.

Amber = This element of the proposal has not been adequately addressed within the submission.

Green = This element of the proposals is considered to be acceptable by officers.

NOTE: The rating assigned will be a result of the officer/panels consideration of the proposal against the development plan (see below) and all other material planning considerations insofar as they are known at this stage (i.e before statutory consultation and public/community engagement has taken place).

Policy Aspect				Comments
Principle of Development				See previous pre-application report following the meeting dated 10 September 2018 - reference- PRE/2019/0178 within which comments are still relevant however reference should now be made to London Plan Policy HI 'Increasing Housing Supply
Design Approach/ Heritage and Conservation				Following the meeting dated 22 February 2021 the new London Plan 2021 was adopted and the requirement are set out below; London Plan (2021) policies emphasise the importance of high-quality design and seek to optimise site capacity through a design-led approach. Policy D3 'Delivering good design' states that development proposals should 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 street hierarchy, building types, forms and proportions. London Plan Policy HC1 seeks to ensure that development proposals affecting heritage assets and their settings, should conserve their significance. This policy applies to designated and non-designated heritage assets. The scheme presented at the pre-application meeting appears to have only partly addressed the design and conservation comments set out in the previous pre-application advice dated 20 January 2020 reference PRE/2019/0250. The following design and conservation comments are made in response to the latest presented scheme - pre-application meeting dated 5 February 2021 and subsequent revisions submitted on 22 February 2021. Whilst the front façade is much improved the design language has not evolved sufficiently and still requires further refinement. The fenestration to the front facade is still oversized and the overall façade composition of the building requires greater consistency between

			front, side and rear elevations. Revisions to the composition of the facade and façade materials and finishes would assist in improving the appearance. The latest iteration of the proposed scheme shows that a new combination of facade finishes only has been tested, which is unconvincing - alternative façade design should be explored. Changes to the proposed texture and materials is sought as it is considered that the light brick at 2nd and 3rd floor level currently make the top half of the building appear dominant. Officers consider that even though the fenestration to the flank of the residential block facing the back of the church is much improved the design of the side elevation still needs to be refined. Whilst the texture, materials and railings of the balconies to the rear elevation has been revised, Officers consider that the proportions of the proposed openings remain excessive in scale, which would be at odds with the verticality of the windows which characterise the architecture of the adjacent buildings, including the listed church. The following points are made in response to the Conservation and Heritage aspects of the scheme: Whilst the scheme has evolved Officers consider the geometry, composition and proportions of the scheme needs further work. The rigidly squared, two storey high corner of the front façade adjacent to the traditional, sloping, small scale architecture and roofscape of the listed church creates a bulky plinth feature - a 'spur' in the flank of the listed church. This results in a building that competes with the listed church instead of complementing it. The gently chamfered corner which has been proposed from second floor and above as an acknowledgement and soft turning of the proposed building towards the church should continue coherently right down to ground level to better respond to its heritage context. The fenestration to the front facade is still oversized as was highlighted in previous advice. The proposed combination of red bricks and more light-coloured facade materials should
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			be subtly used in a decorative way instead of the currently proposed bold colour-block facade. A subtle and articulated use of facade materials, colours and textures is suggested in order to reflect the decorative use of materials in the church facade. It is advised to also consider exploring the use of metal on the top floor particularly copper as this could mitigate the bulk and visual impact of the substantial top floor. Whilst the latest design proposal now includes some texture to the rear façade, there are no substantial compositional changes. The design of the rear elevation still appears quite utilitarian and less responsive to its context than the front elevation. The markedly squared façade composition should be reconsidered, and the openings and balconies should be re-proportioned to improve this elevation as per previous advice. The large opening on the top floor also looks disproportionate and the whole top floor, with its squat proportions really stands out even more so with the use of light-coloured brick. The visual materials presented are again very helpful. The developer would need to agree with Officers verified views from the different locations so to ensure that this concept is successful.
Housing Quality			Following the meeting dated 22 February 2021 the new London Plan 2021 was adopted and the requirement is as follows; London Plan Policy D6 requires housing developments to be of high-quality design, providing comfortable and functional layouts, benefiting from sufficient daylight and sunlight, maximising the provision of dual aspect units and providing adequate and easily accessible storage space as well as outdoor amenity space. Table 3.1 sets out the internal minimum space standards for new developments, while Table 3.2 of the London Plan provides qualitative design aspects that should be addressed in housing developments. The following points are made in response to the scheme presented at the pre-application meeting dated 5 February 2021 and subsequent revisions submitted on 22 February 2021. The internal layout has improved; in particular the 3 bedroom two storey duplex flat at

				ground and lower ground level is much improved with the fairly significant private garden to the rear. The layout however is not always very logical and appears slightly awkward, with some flats having narrow and convoluted corridors. It is noted that there remains some family sized (3 bedroom) flats on upper intermediate floors, relying solely on small (albeit policy compliant) balconies for their private amenity space. It would be preferable if these family sized could be located on the ground floor or top floor, where they would have access to larger amenity space.
Housing Mix				The housing mix of the scheme has been further revised and now comprises; 7 x 1 bed, 5x2 bed, 3x3 bed flats. Officers consider the scheme provides a mix of units which is appropriate for the site.
Affordable Housing				Following the meeting dated 22 February 2021 the new London Plan 2021 was adopted and the requirement is as follows; Affordable housing would be required, on site as 15 residential units are proposed. This is in line with the requirements of the New London Plan policies H4, H5, H6 and H7. Local Plan Policy SP2 requires developments of more than 10 units to contribute to the Borough's target of 40% of affordable housing contributions to the Borough's affordable housing stock. Policy SP2 aims to provide affordable housing by:

Viability			Following the meeting dated 22 February 2021 the new London Plan 2021 was adopted and the requirement is as follows; Subject to viability any proposed scheme providing less than 35% affordable housing must submit a viability report. Any viability report will be independently assessed at the Developer's expense.
Inclusive Design			Following the meeting dated 22 February 2021 the new London Plan 2021 was adopted and the requirement is as follows; Policy D5 of the London Plan and Local Plan Policy SP2 require new housing to achieve the highest standard of accessible and inclusive design. Policy D7 of the London Plan and Local Plan Policy SP2 require new housing is built to meet Building Regulation requirement M4 (2) 'accessible and adaptable dwellings' (formerly Lifetime Homes' standards). This ensures that dwellings are able to be easily adapted to suit the changing needs of occupiers, particularly those with limits to mobility. 10% of all units should be accessible for wheelchair units in accordance to London Plan Policy D7 and Part M4 (3) 'wheelchair user dwellings' of Building Regulations. Any forthcoming application should demonstrate compliance with these requirements of Policies SP2, 3.6 and 3.8.

Sustainability			See previous pre-application report following the meeting dated 20 January 2020 - reference- PRE/2019/0250 within which comments are still relevant. The developer should also consider the following in their energy assessment; - How will the space heating and hot water heating of the church be upgraded; what is the current technology and efficiency, and what is the proposed strategy and efficiency? What is the current space heating demand (in kWh/m²/year – measured)? - What is the energy strategy of the proposed homes? - Will the air tightness and frames of existing church windows also be improved when repairing? - Will any insulation be installed in the church? As a minimum the ground/walls of the kitchen could be insulated as they are also refurbishing this? - Will insulation also be installed into the church roof (and adequate ventilation) as part of the repairs? This should be done as a consequential improvement. - Will any lighting be upgraded in the church? - Has a minimum substrate depth of 120mm been assumed for the proposed living roofs? - The overheating assessment will need to be considered in the upgrade of the church
Drainage and Flooding			Following the meeting dated 22 February 2021 the new London Plan 2021 was adopted and the requirement are set out below: London Plan Policy SI 12 Flood Risk Management and Policy SI 13 Sustainable drainage should now be considered. Local Plan Policy SP5 'Water Management and Flooding' is still relevant.

Impact on Neighbouring Amenity			See previous pre-application report reference PRE/2019/0178 within which comments are still relevant. Reference should now also be made to London Plan Policy D5 which outlines that design must not be detrimental to the amenity of surrounding housing, in specific stating that proposals should provide sufficient daylight and sunlight to surrounding housing that is appropriate for its context, while also minimising overshadowing. London Plan Policy D14 requires development proposals to reduce, manage and mitigate noise impacts
Highways and Transportation			Following the meeting dated 22 February 2021 the new London Plan 2021 was adopted and the requirement is as follows: London Plan Policy T1 requires all development to make the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking and cycling routes, and to ensure that any impacts on London's transport networks and supporting infrastructure are mitigated. Policies T4, T5 and T6 set out key principles for the assessment of development impacts on the highway network in terms of trip generation, parking demand and cycling provision. <u>Transportation considerations</u> A Transport Statement will be required for this proposal, that will need to provide detail on the transportation characteristics and impacts of this proposal, plus the associated mitigations and provide a commentary on how the development works on a day to day basis in transportation terms. The scoping for this document will need to be agreed with Transportation, however it will need to include the following topics; - some comments are made here based on the material submitted so far. <u>Outline of proposed unit numbers and breakdown by size</u>

			The intention is to provide 15 units, broken down as follows; • 7 No. 1 bedroom units • 5 No. 2 bedroom units • 3 No. 3 bedroom units <u>Church floor area uplift</u> It is understood that the existing church hall will be demolished and a new facility provided with this redevelopment with a floor area of 206 sqm. 97 seats are indicated on the lower ground floor drawing. The applicant will need to detail the uplift in church activity and/or attendance that will result from this. The TA that will accompany any future application should details existing attendances and events/clubs and the like with their timing and also what changes are planned. <u>Proposed Access arrangements</u> The site is proposed as car free, with pedestrian access from the adjacent footways. The existing crossover that serves the building to be demolished will no longer be needed, so this can be reinstated to a full height kerb with works to the footway as well. This will provide a better pedestrian environment at this location and will likely enable provision of another on street parking bay (suggested as a blue badge bay) within the CPZ. The applicant will need to meet all of the Council's administrative and works costs for this and enter into the appropriate Highways Act agreement with the Council. <u>Parking provision and impacts</u> The site is proposed as car free. It does have excellent accessibility to public transport services, and is located within the Wood Green Outer CPZ. There may be some parking demands however generated by the development, so whilst the concept of a car free development is supported in principle, Transportation to need to understand the likely demands that may arise and the existing parking conditions in the locality of the site to
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			enable a view to be made. Therefore, the applicant will need to provide and include in their transport statement a Parking Stress Survey, carried out and presented in accordance with the 'Lambeth' methodology. A sensitivity for both 5m and 6m car lengths should be included with the analysis of the survey results. The development would be appropriate for designation as a permit free site, for which the applicant will need to enter into the appropriate planning agreement and meet all of the Council's administrative costs. It is also suggested that to further mitigate potential parking impacts the development have car club provision, so the applicant will need to liaise and consult with local car club operators to obtain their recommendations for car club provision at the development. It is expected that this will include provision of memberships for each unit for three years plus a £50 driving credit per unit to 'pump prime' car club usage. The car club operator may also suggest contribution towards the implementation of additional bays/cars in the locality to meet demands. The applicant has included proposals for the site to have car club provision as described here. <u>Delivery and servicing/refuse and recycling collection arrangements</u> It was commented in the previous submission that refuse and recycling collections will take place from the kerbside. This should be fine however the proposed details will need to be considered and approved by our colleagues in the waste and recycling team. The demands of the church should not change and the residential arrangements will need to include a collection point within the maximum walk distances for collection from a store off of the highway. <u>Cycle parking arrangements to meet London Plan requirements</u> It appears it is intended to provide an internal cycle parking store, which looks to be utilising a double stacking type system to provide 28 spaces. The cycle parking to be provided will need to meet London Plan standards for residential and commercial/employment cycle parking provision in terms of absolute numbers. Full details will need to be provided to confirm it will be achievable within the development footprint. Provision of useable, convenient, high quality secure cycle parking will be absolutely essential. Scaled drawings showing the system intending to be used and the spacing,
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			layouts and access routes will need to be provided with any future application. There will need to be long stay and short stay cycle parking for both uses at the site and these should be clearly defined and detailed <u>Construction Logistics Plan</u> This development will be constructed in a residential area close to a busy junction, and has basement construction required too. Therefore, a detailed draft of the CLP for the site will be required at application stage, outlining the construction period and programme, and the numbers and types of construction vehicles attending the site. All arrangements to minimise the impact on both the Public Highway and adjacent neighbours will need to be included in this document. This will include deliveries and collections being made outside of the peak AM and PM periods, full details of any temporary measures envisaged for the highway,
Air Quality/Land Contamination			Following the meeting dated 22 February 2021 the new London Plan 2021 was adopted and the requirement are set out below: London Plan Policy SI 1 Improving air quality should now be considered. Haringey DM DPD Policy DM23 is still relevant.

Waste and Recycling			The developer has considered the following; 1 x 1100L refuse for each 6 x flats 1 x 1100L recycling for each 10 x flats The developer can likely provide a combined 4 x bin as opposed to 5 1 x 240L food waste bin. Officers are satisfied that the above has been accounted for. The developer has confirmed that the drag distance of the bins would be 10.5m to the pavement. Officers consider this to be acceptable. The developer has confirmed that there is not currently a dropped kerb at the point where the bins would arrive at the pavement. However, there is a kerb a few metres to the south which could be utilised. Alternatively, that dropped kerb could be removed and a kerb reinstated, and the dropped kerb, with a much shorter cross over, be relocated to where we want it at the main entrance to the church link. This would also assist with disabled access as there currently no dropped kerb at this point, where visitors are likely to cross when arriving and leaving the church via the new glazed link entrance. Officers would support the developers proposal subject to the new dropped kerb being authorised by the highways department.
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Fire Safety			Following the meeting dated 22 February 2021 the new London Plan 2021 was adopted and the requirement are set out below; London Plan Policy D12 requires development proposals to achieve the highest standards of fire safety and all major development proposals should be submitted with a Fire Statement, which is an independent fire strategy, produced by a third party, suitably qualified assessor
Trees			See previous pre-application report following the meeting dated 20 January 2020 - reference- PRE/2019/0250 within which comments are still relevant.
Mayor CIL / Haringey CIL and Planning Obligations			See previous pre-application report following the meeting dated 20 January 2020 - reference- PRE/2019/0250 within which comments are still relevant.

Building Control

It is recommended that you obtain technical advice regarding building control matters during the early stages of project design, and Haringey Building Control has extensive experience in working with clients on a wide range of projects. Should you wish to discuss your project and how Haringey Building Control may best advise you regarding compliance with relevant building control regulations, please contact Bob McIver on 020 8489 5500 or by email on Bob.McIver@haringey.gov.uk

Consultation

As stated in the National Planning Policy Framework, that where beneficial, local planning authorities should encourage applicants to engage with the local community before submitting applications. The Council's Statement of Community Involvement (SCI) (2011) (<http://www.haringey.gov.uk/sci>) sets out the Council's approach to engaging with and consulting the community in planning and development issues. As outlined in the SCI applicants of major schemes are advised to undertake early community involvement before submitting an application to the Council.

Development Management, 6th Floor, River Park House, 225 High Road, N22 8HQ

www.haringey.gov.uk

preapp@haringey.gov.uk

A new planning protocol has recently been adopted, this includes the requirement for Applicants to present their schemes to Members of the Planning Sub – Committee at pre-application stage, as well as the opportunity to present the scheme to a Quality Review Panel. Where considered necessary, applicants will also be required to undertake a Development Forum as part of the pre-application process in order to engage the local community in order to obtain their opinions on any proposed development before any planning application is submitted for formal consideration and determination. This can be discussed in more detail at any subsequent pre-application meetings.

Once a planning application is submitted, the LPA will undertake the normal consultation procedures in accordance with the Town and Country Planning (Development Management) Order 2012 which will include providing a minimum of 21 days for neighbours and other statutory and non-statutory consultees to provide responses and comments to any submitted planning application.

The scheme will need to be presented to Members of the Councils Planning Committee for determination. The LPA will endeavour to ensure that a formal decision is issued within the statutory 13 week period however this is contingent on Planning Committee dates.

In order to assist in the application process the applicant is strongly encouraged to enter into a Planning Performance Agreement (PPA) with the Council in order to assist the smooth process of any planning application from pre-application to determination stages. Please contact Valerie Okeiyi on the details provided above to discuss this requirement.

NB: Bounds Green Ward Councillors

Information required for Planning Application Submissions

The following information will be required for registration of the planning application in respect of this site.

1. Standard application form (three copies plus original unless submitted electronically)
2. 'Determining whether an application is CIL liable' form and plan or drawing showing any chargeable development and gross internal area in square metres on each plan
3. Location plan on an up to date map at an identified standard metric scale (typically 1:1250 or 1:2500 to fit onto A4 or A3 paper) with the red line including all land necessary to carry out the proposed development and blue line for any other land owned by the applicant
4. Site plan – direction of North, proposed development in relation to the site boundaries with written dimensions (and public rights of way, trees, hard surfacing and boundary treatment where relevant) typically 1:500 or 1:200
5. Ownership certificate and notices, and Agricultural land declaration
6. Fee

7. Fully annotated and scaled (1:50 or 1:100) drawings showing, floor plans, elevations of the existing and proposed buildings as well as drawings showing site sections and a 'streetscene elevation' showing the relationship with the neighbouring buildings. **Please note that Haringey requires all applications to have a scale bar and all proposed plans/elevations require one significant dimension. This is to ensure that the Planning Officer can accurately measure dimensions using measuring software.**
8. Design & Access Statement (including a statement confirming compliance with Lifetime Homes standards and London Plan SPG housing space standards)
9. Planning Statement
10. Transport Statement
11. Draft Travel Plan
12. Viability Assessment
13. Statement of Community Involvement
14. Energy Assessment and Sustainability Strategy
15. Overheating Report (using TM49 weather files + future weather files and TM52 model for non-residential and TM59 model for residential applications)
16. Air quality assessments
17. Sustainability Statement
18. Biodiversity / Urban Greening Statement
19. Tree Report
20. Heritage Statement
21. Daylight and Sunlight Assessment

For further information please see the Council's Validation Checklist.

List of Relevant Contacts

John McRory – Team Leader – 0208 489 2956
Valerie Okeiyi – Planning Officer – 0208 489 5120
Richard Truscott – Urban Design Officer – 0208 489 5241
Maurice Richards – Transport Planner – 0208 489 5575
Ray Matthews- Drainage Engineer- 0208 489 1147
Michael McNicholas – Head of Waste Management – 0208 489 5561
Bob McIver – Head of Building Control – 0208 489 5500
Lee Warwick– Met. Police Crime Prevention Officer – 0208 217 3813

Development Management, 6th Floor, River Park House, 225 High Road, N22 8HQ

preapp@haringey.gov.uk

www.haringey.gov.uk

Without Prejudice

Please be advised that this response is given at officer level and does not form a formal response or decision of the council with regard to future planning application(s) or other formal approaches. The views expressed above are given in good faith, to the best of ability, and without prejudice to the formal consideration of any future planning application, which will be subject to formal consultation and ultimately decided on by the council.