
PLANNING STATEMENT

In support of an application to the London Borough of Haringey for the demolition of the existing mixed-use buildings and the erection of a building containing 2 x 4 bedroom terraced houses, 2 x 1 bed and 1 x 3 bed apartments at.

10 Ellington Road

Muswell Hill

London

N10 3DG

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1.0 Introduction

- 1.1 This statement on town planning matters is submitted in support of an application for full planning permission for demolition of the existing mixed-use buildings and the erection of a building containing 2 x 4-bedroom terraced houses, 2 x 1 bed and 1 x 3 bed apartments at 10 Ellington Road, Muswell Hill, N10 3DG. It is intended to sit alongside the comprehensive package of submitted drawings, Design and Access Statement, Transport Assessment, Energy Statement and Basement Impact Assessment which collectively form the application and to provide a comprehensive assessment of the proposals in the context of prevailing planning policy.
- 1.2 The application site Ellington Place, 10 Ellington Road lies in the heart of established suburban Muswell Hill. It is a collection of now dilapidated buildings originally built by the Post Office but subsequently converted to mixed residential, workshop and storage uses. The somewhat incongruous buildings have deteriorated quickly in recent years and do little to contribute to this otherwise pleasant suburban environment. The condition of the buildings and the now questionable stability of the site are such that the site, and the surrounding area, would benefit from redevelopment. The wholly residential character of that surrounding area is such that redevelopment should also be for residential use.
- 1.3 This statement will present a succinct overview of the application site and the proposed development. It will avoid repetition of the Design and Access Statement by cross referencing it where necessary. It will then present an assessment of the proposed development in the context of prevailing planning policy as it is set out in the Haringey Local Plan Strategic Policies and Development Management Policies DPD's, the London plan 2021 and, where relevant, NPPF provisions.
- 1.4 It will be demonstrated that the proposals are both policy compliant and acceptable in their own right in terms of on the ground impacts. It will be requested that planning permission be granted accordingly.

2.0 The Site, Its Surroundings and Its Use

- 2.1 Ellington Road is, other than the application site, a wholly residential suburban road. Despite a wide-ranging mix of age and style of property it displays a homogenous character defined predominantly by a tight urban grain i.e. the dwellings sit close together with little meaningful spacing and consistent, though not uniform, building height as one climbs the sloping road upwards from its junction with Cranley Gardens, reaches its top and then descends again down to its junction with St Jame's Lane. At the point at which Ellington Road passes the application site the road is nearing its peak but is still rising. Although the wider land falls sharply away in a broadly southerly direction from Ellington Road, the application site has been artificially levelled and there is a consequent steep retaining structure at its rear.
- 2.2 The application site currently contains a jumble of now somewhat dilapidated buildings, apparently originally built by the post office which have subsequently been extended and converted to various uses including residential, storage and workshops. Those buildings are two storey at the site frontage and single storey behind. The existing buildings present themselves as a run of garage doors at street level which rather detract from the more characteristic dwellings that prevail. In the middle (approximately) of that run of garage doors is a carriage style access over sailed by first floor-built form above. That first floor contains the single residential unit on the site – a two bedroom flat. Behind this run of lock up garages to the site frontage is a collection of still more dilapidated single storey buildings which hug the eastern and western boundaries of the site leaving a central open courtyard. Beyond the rear (southern) boundary of the site is a near vertical retaining wall which is also appears to be in a perilous state of disrepair and requires urgent attention.
- 2.3 In terms of use, there appears to be no record of any planning history on the site and certainly nothing relating to the use of the buildings. It follows that the buildings do not have a documented authorised use. The predominant use over time is understood

to have been as domestic lock-up garages and that remains the predominant use today though there is a small office unit, a sculpture studio, storage of assorted items and the first floor residential flat – a use best collectively described as “mixed.”

- 2.4 The submitted Design and Access Statement presents a series of both graphic and photographic images of the site which provide good illustration of its disposition and current condition. This includes some images of the retaining structure as seen from the residential rear gardens to the south. Submitted drawing CER 209 PL 012 provides existing elevations of the buildings currently on site and reveals their bulk and mass, their utilitarian appearance and the presence of outward looking windows in close proximity to adjacent rear gardens.
- 2.5 It will be evident from both the above and the associated submitted documentation that the site currently detracts from the otherwise pleasant residential environment in which it sits. A ‘do nothing’ scenario would not just perpetuate that harm but would exacerbate the potential threat posed by the poor condition of the buildings on site and the associated stability of the land. Redevelopment is required, and is required in the short term. The use and character of the surrounding area leads firmly to the conclusion that that redevelopment should be residentially led.

3.0 The Proposed Development

- 3.1 A full description of the proposed development and the design rationale underpinning it is set out in the Design and Access Statement that accompanies the application. A succinct overview is presented below.
- 3.2 The condition of the existing buildings on the site, and more particularly the condition of the raised slab and retaining structure supporting it are such that redevelopment must rightly begin with the wholesale removal of both. The consequent restoration of natural land levels provides a sloping site with the opportunity to reposition the built form forward in the site, moving it away from the Cranley Gardens rear gardens and addressing Ellington Road.
- 3.3 The proposed building respects and reinforces the established building line in Ellington Road by simply continuing the line of the three storey town houses to the east across the site frontage. The proportions of the proposed building takes its lead from those same adjacent houses as illustrated on the submitted elevations and 3D modelling drawings. The proposed buildings have relatively shallow depth in order to maximise separation distances to the Cranley Gardens dwellings to the rear. From street level the building will appear to have two storeys with a third storey set back and finishes in a different material, to resemble a pitched roof. To the rear there will be an additional storey at the natural ground level, with direct access to the rear gardens.
- 3.4 In terms of architectural style the local area is a mix of traditional, more contemporary houses and block of flats. At pre-application stage the Design Officer advised that a contemporary approach with a flat roof would be appropriate. The proposed development would use traditional materials with contemporary detailing. The elevations will be finished in brick, with the top floor in metal cladding.

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- 3.5 Additional advice adopted following pre-application meetings with Council Officer's includes the need for a minimum 20m distance to Cranley Gardens properties, the importance of the western flank elevation which will be prominent in views along Ellington Road, that 3 storeys development is likely to be acceptable and could have a well-designed flat roof, that the removal of the existing crossover if possible would extend on street parking and that the importance of the relationship with properties at the rear (Cranley Gardens) was such that a daylight and sunlight assessment would be advised.
- 3.6 All of the proposed dwellings either meet or exceed the National Space Requirements. The proposals would replace an unsightly, underused building in poor state of repair with a well-designed, bright, comfortable and sustainable residential accommodation in this well-connected central location.

4.0 Assessment

The Principle

- 4.1 The site lies in the heart of a mature, well-established suburban location of predominantly residential use and with good access to local services and facilities by means other than the private car. The site has no specific designation in the policies map accompanying the local plan nor is there any elevated level of protection that would distinguish it from other similar character areas.
- 4.2 The 2021 National Planning Policy Framework (NPPF) establishes the overarching principles of the planning system, including the requirement of the system to “drive and support development” through the local development plan process. It advocates policy that seeks to significantly boost the supply of housing and requires local planning authorities to ensure their Local Plan meets the full, objectively assessed housing needs for market and affordable housing. Paragraph 69 notes that small and medium sized sites can make an important contribution to meeting the housing requirement of an area and are often built out relatively quickly.
- 4.3 The London Plan (2021) sets out housing targets for London over the coming decade, setting a 10-year housing target (2019/20 - 2028/29) for Haringey of 15,920, equating to 1,592 dwellings per annum. Policy H1 of the London Plan ‘Increasing housing supply’ states that boroughs should optimise the potential for housing delivery on all suitable and available brownfield sites. Policy H2A of the London Plan outlines a clear presumption in favour of development proposals for small sites such as this (below 0.25 hectares in size). It states that they should play a much greater role in housing delivery and boroughs should pro-actively support well-designed new homes on them to significantly increase the contribution of small sites to meeting London’s housing needs. It sets out (table 4.2) a minimum target to deliver 2,600 homes from small sites in Haringey over a 10-year period. It notes that local character evolves over time and will need to change in appropriate locations to accommodate more housing on small sites.

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- 4.4 London Plan Policy D3 seeks to optimise the potential of sites, having regard to local context, design principles, public transport accessibility and capacity of existing and future transport services. It emphasises the need for good housing quality which meets relevant standards of accommodation.
- 4.5 The Haringey Local Plan Strategic Policies DPD 2017 (SPDPD), sets out the long-term vision of the development of Haringey by 2026 and sets out the Council's spatial strategy for achieving that vision. Policy SP2 states that the Council will aim to provide homes to meet Haringey's housing needs and to make the full use of Haringey's capacity for housing by maximising the supply of additional housing to meet and exceed the stated minimum target. The supporting text to Policy SP2 of the Local Plan specifically acknowledges the role these 'small sites' play towards housing delivery.
- 4.6 The Development Management Development Plan Document 2017 (DMDPD) supports proposals that contribute to the delivery of the planning policies referenced above and sets out its own criteria-based policies against which planning applications will be assessed. Policy DM10 of the DMDPD seeks to increase housing supply and seeks to optimise housing capacity on individual sites.
- 4.7 In light of the above, the provision of additional dwellings in this location is acceptable in principle and should thus be encouraged provided of course that there is compliance with all other policy provisions and acceptability in terms of actual impacts. These potential impacts are addressed in the remainder of this report.

Loss of the Existing Building/Use

- 4.8 Section 2 of this statement has described the absence of any planning history for the site and the natural conclusion that follows that there is no documented authorised use. Thus, any concerns that there might be regarding the loss of employment land ought not really arise. Firstly, because any employment use of the land and/or buildings would be unauthorised and it is questionable whether the site really is

employment land at all and secondly, even if it was, in reality it does not actually generate or facilitate any employment.

- 4.9 Nonetheless for completeness, it is appropriate to examine the loss of the existing uses in the context of relevant employment policy, in this instance DMDPD policy DM40 – ‘Non-designated employment land and floorspace’. The policy provides at part B that the loss of employment land and floorspace will only be permitted where it can be demonstrated that the building or land is no longer suitable for continued employment use. It sets out five criteria for the assessment thereof including (b) the age and condition of the existing building(s) and the potential for refurbishment or adaptation, and (c) site layout, access, and relationship to neighbouring uses.
- 4.10 In these regards the existing buildings are self-evidently well past their sell-by date. They are deteriorating rapidly with some potentially ready to fall over. They are well beyond economic repair. In addition, the crumbling rear retaining structure impacts the adjacent rear gardens despite shoring up works.
- 4.11 There is no prospect of the necessary repair and refurbishment taking place if the use is to be an employment use. The wholly residential surroundings, the access via residential roads and the very restricted vehicular access to the site itself are such that no commercial occupier would be interested. Nor would re-use or redevelopment for employment purposes be desirable due to its likely impact on surrounding residential properties.
- 4.12 In summary on this issue there is no *actual* loss of employment floorspace that will arise since no authorised use will be lost. Nor would the retention or redevelopment of employment floorspace here be either practical or desirable. A more intense employment use in this location would have meaningful and deleterious impacts on nearby residential properties and no sensible planning purpose would be served thereby.

The Impact on Character and Appearance

- 4.13 Paragraph 126 of the NPPF (2021) seeks the creation of high quality, beautiful and sustainable buildings. Parts b) and c) of paragraph 130 of the NPPF (2021) states that planning decisions should ensure that developments are visually attractive as a result of good architecture and are sympathetic to local character and history, including the surrounding built environment.
- 4.14 The London Plan (2021) emphasises the importance of high-quality design and seeks to optimise site capacity through a design-led approach. Policy D6 of the London Plan seeks to ensure high housing quality and standards and notes the need for greater scrutiny of the physical internal and external building spaces and surroundings as the density of schemes increases due the increased pressures that arise. It includes qualitative measures such as minimum housing standards.
- 4.15 Policy SP11 of the SPD PD requires that all new development should enhance and enrich Haringey's built environment and create places and buildings that are high quality, attractive, sustainable, safe and easy to use. Policy DM1 of the DMD PD requires development proposals to meet a range of criteria having regard to several considerations including building heights; forms, the scale and massing prevailing around the site; the urban grain; and a sense of enclosure. It requires all new development to achieve a high standard of design and contribute to the distinctive character and amenity of the local area. Policy DM6 expects all development proposals to include heights of an appropriate scale, responding positively to local context and achieving a high standard of design in accordance with Policy DM1 of the DMD PD.
- 4.16 The Design and Access Statement describes how the proposed development is an appropriate response to the detailed assessment of the character and appearance of the surrounding area which has been undertaken. The design exercise is undoubtedly a challenging one given the specific and unusual constraints of the site. The proposal does not seek to mimic surrounding development, it is a deliberately contemporary building but it adopts the proportions and spacing of adjacent built form and seeks to

improve the character and appearance of the suburban environment in which it will sit. Compliance with these policy aspirations is demonstrated in the extensive graphic material that is submitted alongside the application.

Impact on Neighbours

- 4.17 London Plan Policy D6 outlines that design must not be detrimental to the amenity of surrounding housing, specifically stating that proposals should provide sufficient daylight and sunlight to surrounding housing that is appropriate for its context, while also minimising overshadowing.
- 4.18 Policy DM1 'Delivering High Quality Design' of the DMDPD states that development proposals must ensure a high standard of privacy and amenity for a development's users and neighbours. Specifically, proposals are required to provide appropriate sunlight, daylight and aspects to adjacent buildings and land, and to provide an appropriate amount of privacy to neighbouring properties to avoid overlooking and loss of privacy and detriment to amenity of neighbouring residents.
- 4.13 The Design and Access Statement presents a succinct appraisal of the daylight and sunlight impacts of the proposal. The houses and gardens in Cranley Gardens are only minimally impacted in this regard due to their distance and positioning to the south of the application site whilst the properties to the north side of Ellington Road experience only the same impact from the proposed buildings as exists elsewhere along the length of Ellington Road.
- 4.14 The height differential between the proposed building and the Cranley Gardens properties is acknowledged and has been a prominent factor in the evolution of the scheme. The Design and Access Statement references the distance between both built form and between windows in order to protect as far as possible loss of privacy.
- 4.15 Overall, the proposed redevelopment should deliver an improvement to the amenities enjoyed by neighbouring dwellings. It is thus policy compliant.

Living Conditions for Future Occupiers

- 4.16 The Nationally Described Space Standards set out the minimum space requirements for new housing. The London Plan 2021 standards are consistent with these. 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 outdoor amenity space. It provides qualitative design aspects that should be addressed in housing developments.
- 4.17 All proposed dwellings exceed minimum space standards including bedroom sizes. All homes would have private amenity space in the form of either a private rear garden or a projecting balcony that meets the requirements of the Mayor's Housing SPG Standard 26. All dwellings are well laid out to provide useable living spaces and sufficient internal storage space.

Traffic Impact, Car/Cycle Parking

- 4.18 London Plan Policy T1 sets out the Mayor's strategic target for 80% of all trips in London to be made by foot, cycle or public transport by 2041. This policy also promotes development that makes the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport. Policy T6 sets out cycle parking requirements for developments, including minimum standards. T7 concerns car parking and sets out that 'car-free' development should be the starting point for all development proposals in places that are well-connected by public transport. Policy T6.1 sets out requirements for residential car parking spaces.
- 4.19 These aspects of the proposal are addressed in the Transport Statement submitted with the application. It concludes that the site is in a highly accessible location with convenient access to public transport services and local facilities. The sustainable nature of the location means that residents will have a significantly lower reliance on owning a car. The objective of the London Plan policies is to maximise sustainable

travel by restricting access to car parking and the car free nature of the proposals comply with that policy approach. The car parking surveys demonstrate that there is considerable on street parking capacity that would be able to absorb any parking demand that the development may generate. In support of the car-free nature of the scheme the development will include high quality, secure cycle parking in accordance with the London Plan standard.

- 4.20 Overall, there are no highway related reasons why the development should not receive planning permission.

Affordable Housing/Housing Mix

- 4.21 Policy H10 of the London Plan (2021) states that schemes should generally consist of a range of unit sizes. This is supported by Policy SP2 of the SPD and Policy DM11 of the DMDPD. The proposed development consists;

Type	No.	Mix
1 bedroom flat	2	40%
3 bedroom flat	1	20%
4 bedroom house	2	40%
TOTAL	5	100%

- 4.22 This broad mix of dwelling size represents an appropriate response to local needs/demand whilst also ensuring compatibility with the surrounding area.
- 4.23 Policy DM13 of the DMDPD states that affordable housing will be sought on schemes with the site capacity to accommodate more than ten dwellings. This proposal for 5 homes is comfortably below that threshold.

Sustainability, Energy and Climate Change

- 4.24 The NPPF requires development to contribute to the transition to a low carbon future, reduce energy consumption and contribute to and conserve the natural environment.
- 4.25 SPDPD Policy SP4 requires all new developments to introduce measures that reduce energy use and carbon emissions. Residential development is required to achieve a reduction in CO2 emissions. SPDPD Policy SP11 requires all development to adopt sustainable design and construction techniques to minimise impacts on climate change and natural resources.
- 4.26 Policy DM1 of the DMDPD states that the Council will support design-led proposals that incorporate sustainable design and construction principles and Policy DM21 of the DMDPD expects new development to consider and implement sustainable design, layout and construction techniques.
- 4.27 The submitted Energy and Sustainability Statement that accompanies the application demonstrates that the proposal will adopt a high standard of design with regard to energy efficiency principles. It has been estimated that the proposed development will achieve a reduction of at least 24% in the carbon dioxide emissions through fabric and services efficiencies. A further 50% reduction through the use on-site low or zero carbon technology in the form of heat pumps. This results in a total of 74%. It is envisaged during detailed construction design these figures can be improved. It also demonstrates that the development complies with the requirements of planning policy with regard to water consumption and overheating.

Trees and Ecology

- 4.28 London Plan Policy G7 requires existing trees of value to be retained, and any removal to be compensated by adequate replacement. This policy further sets out that planting of new trees, especially those with large canopies, should be included within development proposals. Policy SP13 of the Local Plan recognises, “trees play a significant role in improving environmental conditions and people’s quality of life”,

where the policy in general seeks the protection, management and maintenance of existing trees.

- 4.29 SPDPA Policy SP11 promotes high quality landscaping on and off-site and Policy SP13 seeks to protect and improve open space and providing opportunities for biodiversity and nature conservation. Policy DM1 of the DMDPA requires proposals to demonstrate how landscape and planting are integrated into the development and expects development proposals to respond to trees on or close to a site. Policy DM21 of the DMDPA expects proposals to maximise opportunities to enhance biodiversity on-site.
- 4.30 The application site as it currently exists has no trees or landscaping, nor any ecological/biodiversity value. Those parts of the site not covered by buildings are instead covered by concrete hardstanding. The proposed redevelopment does therefore present an opportunity to deliver significant enhancements in both of these regards. The site plan indicates opportunities for new planting to the front of the site whilst the newly created rear gardens also provide further opportunity for planting and biodiversity enhancement. Such planting, once established may also assist in maintaining privacy to adjacent gardens.
- 4.31 The offsite embankment (i.e. beyond the retaining wall) to the south of the site does contain some trees and planting that is at the end of the rear gardens of the Cranley Gardens gardens and measures to minimise any impact thereon will be secured.

Flooding/Drainage Issues

- 4.32 SPDPA Policy SP5 and Policy DM24 of the DMDPA seek to ensure that new development reduces the risk of flooding and provides suitable measures for drainage. The application site lies within Flood Zone 1 of the Environment Agency's Flood Risk Map. This means the site is classified as being at low risk and defined as having a less than 1 in 1,000 annual probability of fluvial and tidal flooding. As such, there are no

restrictions on development, including more vulnerable uses such as Use Class C3 (dwellinghouses), in this location in terms of fluvial and tidal flood risk.

Basement Impact

- 4.33 The sloping nature of the site is such that the lower floor of the proposed building is a partial basement. Hence, at the request of the planning officer in a pre-app meeting, a Basement Impact Assessment (BIA) is submitted with this application, which seeks to demonstrate that the impacts of the basement works would be acceptable, as required by Policy DM18 of the DMDPD 2017. As required the Impact assessment demonstrates no adverse effect on the structural stability of the application building and neighbouring buildings, no increase to flood risk to the property and nearby properties, no harm to the established character of the surrounding area, and no adverse impact the amenity of adjoining properties or the local natural and historic environment.

5.0 The Planning Balance

- 5.1 The previous sections' review of the actual impact of the appeal proposal 'on the ground' and in the context of adopted local policy also needs to be seen in a wider perspective. The Council at the present time is unable to fully evidence its five-year supply of housing land and hence the adopted SPDPD and DMDPD policies upon which the Council must rely if it is to resist these proposals are now out of date.
- 5.2 The 'presumption in favour of sustainable development' and paragraph 11(d) of the NPPF should be treated as a material consideration when determining this application, which for decision-taking means granting permission unless the application of policies in the NPPF that protect areas or assets of particular importance provides a clear reason for refusal or any adverse impacts of doing so would *significantly and demonstrably* outweigh the benefits when assessed against the policies in the NPPF taken as a whole.
- 5.3 Meeting general housing needs is a benefit, consistent with the Government's objective of significantly boosting the supply of homes. The appeal scheme is immediately available and can deliver much needed housing in the short term. The development will create construction jobs in the short term and a significant boost to the local economy through 'first occupation' expenditure. This is expenditure on new furniture and other household goods that residents spend as one offs when moving into a new home. The appeal proposal will also consolidate demand for local services and facilities and secure contributions thereto by way of CIL receipts which will also benefit the wider community. The importance of housebuilding as part of and supporting economic activity and growth is a still more significant factor and benefit as the country seeks to mitigate the economic effects of the pandemic.
- 5.4 Preceding sections of this statement have sought to demonstrate the absence of any material harms arising from the proposed redevelopment. In fact, positive benefits are

claimed to accrue from the removal of these dilapidated buildings and the delivery of high-quality housing, albeit in only relatively small numbers. In the context of the NPPF requirement to significantly boost the supply of housing, if a proposal to deliver housing is to be reasonably resisted the onus is upon the decision maker to demonstrate not just that some marginal harm might arise from the proposed development but that the harm is “significant and demonstrable”, this is the test set out the NPPF. There is no such harm here and the development should be allowed to proceed accordingly.

6.0 Summary and Conclusion

- 6.1 There is no in principle objection to residential redevelopment in this location and the loss of the existing buildings and their use should not be a determining matter. Analysis in the preceding sections of this report establish that the impacts of the proposal are acceptable both in their own rights and in terms of their consequent planning policy implications.
- 6.2 The design of the proposed building is well considered and stems from a detailed analysis and understanding of the site and its constraints. The topography of the site and the juxtaposition of surrounding homes presents a challenge to the schemes' designers but that challenge has been addressed successfully with a building which will improve upon the character and appearance of the area without any serious adverse impacts.
- 6.3 The car free nature of the proposed development is fully rationalised and justified in the accompanying Transport Statement.
- 6.4 This is an acceptable and policy compliant proposal which should rightly be supported and approved accordingly.