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Via planning portal only

Dear Sir/Madam,

PLANNING APPLICATION – THE TOWN AND COUNTRY PLANNING ACT 1990

CONSTRUCTION OF A BASEMENT AND MANSARD EXTENSION TO CREATE 4 ADDITIONAL FLATS (USE CLASS C3), WITH ASSOCIATED EXTERNAL AMENITY SPACE, LANDSCAPING, CYCLE STORAGE AND THE REMOVAL OF EXISTING PIPEWORK.

ELM COURT, 55 CHOLMELEY PARK, LONDON, N6 5EJ

Please accept this covering letter as the Planning Statement to support this application for the above proposed works at Elm Court, 55 Cholmeley Park N6 5EJ ('the site'). This letter provides a summary of the site and the proposed development.

Please find also enclosed the following:

- Completed application form
- Completed CIL form
- Full set of existing and proposed floor plans, sections and elevations
- Design and Access Statement
- Heritage Statement
- Basement Impact Assessment (BIA)
- Tree Survey and Arboricultural Impact Assessment
- Flood Risk Assessment (FRA) and Drainage strategy
- Energy Report

The Site & Its Context

Elm Court is a four-storey mid-20th century building with a substantial two-tiered hipped roof, located on the east of Cholmeley Park. The building comprises x8 flats. Vehicular access is to the south of the site and to the rear is a block of garages and private amenity space.

The site is not statutory listed however, is located within Highgate Conservation Area (sub- area 3). The application property is not identified as a positive contributor to the character conservation area. The nearest listed building is the Grade II listed Furnival House, located approximately 40m south-west of the site. The site is also located within Highgate Neighbourhood Plan Area.

The surrounding area is predominantly characterised by large residential properties and flat blocks of varying styles, set back behind trees and hedges. A number of buildings on the street have been extended and/or altered, including Parklands opposite the site and the Grade II listed Furnival House located approximately 40m south-west of the site.

The site is located within flood zone 1 and within a critical drainage area. The site is also within Public Transport Access Level (PTAL) 4.



Figure 1: Aerial view of site from the west with indicative red line boundary

Relevant Planning History:

– The site –

On 1st August 1995, planning permission was granted (ref: HGY/1995/0744) for the insertion of a window at ground floor level.

On 6th February 2012, planning permission was granted (ref: HGY/2011/2317) for the replacement of existing metal (steel) UPVC windows/doors with double glazed windows/doors.

On 24th April 2015, planning permission was granted (ref: HGY/2020/0575) for the construction of a new garden wall, side gates and resurfaced driveway following demolition of the existing front garden wall and new front porch and door.

– Surrounding sites –

Kempston House, 52 Cholmeley Park:

On 3rd April 2009, planning permission was granted (ref: HGY/2008/2365) for the erection of roof top addition to Kempston House to be used in connection with an existing top floor flat.

Furnival House, 50 Cholmeley Park:

On 23rd January 2009, planning permission and listed building consent was granted (refs: HGY/2008/1432 & HGY/2008/2021) for change of use from hostel to residential (C3) and conversion of property into 15 residential units comprising of 6 x 3 bed, 7 x 2 bed and 2 x 1 bed flats that will include the erection of two storey rear stepped infill extension and replacement top floor structure to create new unit. Excavation of lower ground floor and new basement to accommodate leisure facilities, 11 car parking spaces in basement area and four parking space externally, and 15 cycle spaces. Refuse / recycling facilities and associated landscaping.

On 17th September 2010, the above planning permission and listed building consent was renewed under refs HGY/2010/1148 & HGY/2010/1175.

14 Winchester Place:

On 8th March 2015, planning permission was granted (ref: HGY/2015/2806) to demolish the existing house and replace with two x4 bedroom houses in semi-detached form, front garden, amenity space and off-street parking.

Pre-application Advice:

Paragraph 40 of the National Planning Policy Framework (NPPF) highlights that:

“early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties. Good quality pre-application discussion enables

better coordination between public and private resources and improved outcomes for the community.”

A pre-application advice enquiry was submitted to the LPA (ref: PRE/2024/0399) for a basement and roof extension to the main property and a garage redevelopment to the rear to provide additional residential units on site.

The advice received from the LPA in relation to the proposed basement and roof extension was as follows:

- Supply of housing / small sites: The Council accepts the principle of residential intensification on the site and recognise the importance of making efficient use of land including small sites, which has to be balanced with desirability of maintaining the character of an area.
- Mansard extension: Officers appreciated that there is little consistency in the area in terms of roof design and building scale. It was recognised that there is a wide variety of roof forms within the area, with several including dormers and mansard extensions. However, it was concluded that due to the height, scale and prominence of the site, a significant alteration to the existing roof form would have a negative impact upon the character and appearance of the area.
- Revised mansard extension: Following the above advice, revisions were made to seek to address the Council's concerns. This involved relocating the bulk of the extension to the rear and leaving the front elevation unchanged. However, officers concluded that due to the angle of the building in relation to Cholmeley Park, the roof extension would be widely seen when ascending the hill.
- Basement development: The Council considers the basement proposals to be acceptable in design and heritage terms.
- Neighbour amenity: The roof and basement works were not considered to raise significant amenity issues.
- Layout and standard of accommodation: all dwellings were considered to be acceptable with regard to internal space standards, as well as providing dual aspect and access to good conditions of light, outlook and amenity space. Full details of mechanical ventilation would be sought as a prior to occupation condition.
- Other matters: No objections raised, subject to submission of supporting documentation and compliance with policy requirements.

Proposal:

The proposed development seeks planning permission for extensions and alterations to Elm Court to provide four new residential units. The proposed works are as follows:

- Mansard extension to provide 2 additional 2B 4P flats, with roof terraces to the front and rear elevations;

- Basement extension to create 2 additional flats (1 x 1B 2P and 1 x 3B 6P) with private amenity space;
- Removal of existing pipework on side elevations;
- Proposed secure cycle storage to the rear.

Please refer to the Design & Access Statement and submitted plans for further detail regarding the proposed development.

Legislation, Policy & Guidance:

Legislation

Section 38(6) of the Planning & Compulsory Purchase Act provides that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise.

Section 72 (1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 confirms that with respect to any buildings or other land in a conservation area, the local planning authority shall pay special attention to the desirability of preserving or enhancing the character and appearance of that area.

National Planning Policy Framework

The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these are expected to be applied. At the heart of the NPPF is a presumption in favour of sustainable development which incorporates three specific strands – economic, environmental and social.

The following sections of the NPPF are most relevant to the consideration of this application:

- Section 2 (Achieving sustainable development)
- Section 5 (Delivering a sufficient supply of homes)
- Section 11 (Making effective use of land)
- Section 12 (Achieving well-designed places)
- Section 16 (Conserving and enhancing the historic environment)

Development Plan

For the purposes of this site, the development plan comprises of the London Plan (2021), Haringey's Site Allocations DPD (2017), Strategic Policies DPD (2017) and Development Management DPD (2017) and the Highgate Neighbourhood Plan (2017).

Haringey Council and the Mayor of London's adopted Supplementary Planning Documents and Guidance ('SPD's/SPG's'), and Conservation Area Appraisal provide further guidance as to how

the council with apply the development plan policies and manage development in conservation area. These documents can be material considerations in planning decisions.

The following policies and guidance will likely be considered relevant to the proposed development:

The London Plan (2021)

- GG4 (Delivering the homes Londoners need)
- D1 (London's form, character and capacity for growth)
- D3 (Optimising site capacity through the design-led approach)
- D4 (Delivering good design)
- D6 (Housing quality and standards)
- D10 (Basement development)
- H1 (Increase housing supply)
- H2 (Small sites)
- H3 (Housing size mix)
- HC1 (Heritage conservation and growth)
- SI 12 (Flood risk management)
- SI 13 (Sustainable drainage)
- T1 (Strategic approach to transport)
- T4 (Assessing and mitigating transport impacts)
- T5 (Cycling)
- T6 (Car parking)
- T6.1 (Residential parking)
- T7 (Deliveries, servicing and construction)

Haringey Strategic Policies DPD (2017)

- SP2 (Housing)
- SP4 (Working towards a low carbon Haringey)
- SP6 (Waste and recycling)
- SP7 (Transport)
- SP11 (Design)
- SP12 (Conservation)
- SP13 (Open space and biodiversity)

Haringey Development Management DPD (2017) ('DMDPD')

- DM1 (Delivering high quality design)
- DM2 (Accessible and safe environments)
- DM9 (Management of the historic environment)
- DM10 (Housing supply)
- DM11 (Housing mix)
- DM12 (Housing design and quality)
- DM18 (Residential basement development and light wells)

- DM19 (Nature conservation)
- DM21 (Sustainable design, layout and construction)
- DM23 (Environmental protection)
- DM24 (Managing and reducing flood risk)
- DM25 (Sustainable drainage systems)
- DM26 (Critical drainage areas)
- DM29 (On-site management of wastewater and water supply)
- DM32 (Sustainable transport)
- DM32 (Parking)

Highgate Neighbourhood Plan (2017) (HNP)

- SC1 (Highgate's housing needs)
- TR3 (Minimising the impact of traffic arising from new development)
- TR4 (Reducing the negative impact of parking in Highgate)
- OS2 (Protection of trees and mature vegetation)
- OS4 (Biodiversity and Highgate's Green Grid)
- DH2 (Development proposals in Highgate's conservation areas)
- DH5 (Roofs and roofspace)
- DH7 (Basements)
- DH8 (Refuse)

SPD's, SPG's & Technical Documents

- Haringey's Sustainable Design and Construction SPD (2013)
- Haringey's Waste Storage Guidance Note SPG
- Highgate Conservation Area Character Appraisal and Management Plan (2013)
- Haringey's Draft Basement Guidance Note (2012)
- Mayor of London's Housing SPG (2016)
- Mayor of London's Housing Design Standards SPG (2016)

Planning Assessment:

Principle of Development:

The NPPF (2024) requires LPA's to significantly boost the supply of housing (para 64), with it also identified that small and medium sized sites can make an important contribution to meeting local housing requirements (para 74).

London Plan (2021) sets out a presumption in favour of small sites (Policy H2) and confirms that all those involved in planning and development must ensure that more homes are delivered (Policy GG4) and that all development must make the best use of land by following a design-led approach that optimises the capacity of sites (Policy D3).

Policy SC1 of the HNP (2017) states that the Plan will help to facilitate the delivery of a minimum of 300 net additional housing units in Highgate up to 2026. It states that new development must

demonstrate how it contributes toward a range of housing types and tenures to meet the identified needs of the Plan area and help to achieve a balanced, inclusive and sustainable community. New development which optimises the use of land and buildings to create inclusive and mixed communities in terms of demographics, household types and tenures will be treated as a benefit of significant weight. This includes proposals involving smaller units to provide for a mix of house sizes to allow older residents to downsize from family housing to smaller units.

There are no development plan policies restricting the extension and alteration of existing buildings to provide new homes. The above policies will be afforded due weight within the planning assessment. The proposal supports the aims and objectives of the development plan which seeks to maximise the supply of housing including through the use of small sites, making the most efficient use of land and optimising site capacity, while supporting the provision of smaller units and mixed and sustainable communities.

The principle of the proposed development is therefore acceptable and is expected that significant weight will be afforded to the proposal's contribution to the local housing stock and mixed communities, which will assist in meeting strategic regional and local housing needs.

Housing Mix:

Policy DM11 of the DMDPD confirms that residential developments should provide a mix of housing having regard to a range of factors including the individual site circumstances and scale of the development proposed.

Haringey's Strategic Housing Market Assessment (2014) outlines that overall, the council should ensure provisions of a diverse range of housing by number of bedrooms are provided to meet a range of needs and deliver sufficient flexibility within the boroughs housing stock. It sets out that the market housing need is greatest for 3 bed (67%), followed by 2 beds (25%) and then 1 bed (14%).

The proposed housing mix has been informed by the identified housing needs, the specific characteristics of the site, and the scale of development proposed. The development seeks to diversify the existing mix by:

- Introducing a new family-sized (3 bed) unit at garden floor level to meet the identified need for family-sized housing; and
- Increasing the provision of 2-bed units on site in an area which is dominated by large family housing.

The table below shows the existing and proposed provisions:

Unit Type	Existing Provision	Proposed Provision
1-bedroom, 2-person	2 units	3 units
2-bedroom, 4-person	6 units	8 units

3-bedroom, 6-person	–	1 unit
Total Units	8 units	12 units

The proposal will therefore make a positive contribution to the borough's housing mix and overall housing stock in line Policy DM11 of the DMDPD.

Design & Heritage:

The application site lies within the Highgate Conservation Area and is therefore subject to the statutory duty under Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to pay special attention to the desirability of preserving or enhancing the character and appearance of the conservation area. This duty does not prevent change, but requires that proposals are assessed with regard to their impact on the significance of the heritage asset.

Policy D3 of the London Plan (2021) emphasises the need to optimise site capacity and achieve higher densities through a design-led approach.

Policy SP11 of the Strategic Policies DPD requires development to contribute positively to the built environment and create buildings that are high-quality, attractive, sustainable, safe and easy to use.

These strategic aims are reflected within the provisions of Policy DM1 and DM2 of the DMDPD. Policy DM1 requires all new development to achieve a high standard of design that contributes to the distinctive character and amenity of the surrounding area. Policy DM2 seeks to ensure new developments provide accessible and safe environments.

Policy DM9 of the DMDPD sets out that development which conserves and enhances the significance of heritage assets and their setting will be supported. It continues to set out that proposals for extensions and alterations to existing buildings in conservation areas should complement the architectural style, scale, proportions, materials and details of the host building and should not appear overbearing or intrusive. This reflects the aims set out in Policy DM12 of the DMDPD in relation to residential extensions.

Basement Extension

The proposed basement extension provides two additional residential units and is largely contained below existing ground levels. The Council confirmed at pre-application stage that the basement proposals are acceptable in design and heritage terms.

Where visible externally, the development is limited to modest lightwells and new windows, primarily on the side elevation. These are carefully proportioned and detailed to reflect the existing fenestration, ensuring a coherent and sympathetic appearance. Associated patios and areas of hardstanding are discreetly located and finished in high-quality materials.

Mansard Extension

Elm Court is a mid-20th-century apartment block of utilitarian design, constructed in buff brick with a substantial double-tiered hipped roof. The building is not identified as a positive contributor to the significance of the Highgate Conservation Area and makes a neutral contribution to its character and appearance. Its existing roof form is not of architectural or historic significance in its own right, nor does it represent a defining element of the conservation area's special interest.

The proposed roof alteration replaces the existing bulky hipped roof with a two-tier mansard form. Importantly, the proposal results in a reduction in overall ridge height when compared with the existing roof arrangement. As such, the development does not increase the building's height, scale or massing within the townscape and cannot reasonably be characterised as over-dominant or visually intrusive by virtue of height.

The Council's pre-application advice acknowledged that the surrounding area is characterised by a diverse and mixed roofscape, including dormers, crown roofs and mansard extensions. This assessment is supported by the submitted Heritage Impact Assessment, which identifies multiple examples of mansard roofs within the immediate and wider context, including prominent nearby buildings such as Furnival House, 8 Parklands (opposite the site) and 40 Cholmeley Park which occupies the corner plot with Cholmeley Crescent. While mansards are not a universal or dominant roof form, they are a recognisable and established component of the local townscape and contribute to the architectural variety that defines the conservation area.

The Highgate Conservation Area Character Appraisal recognises the area's architectural diversity and the contribution of buildings from different periods, including later flat blocks and varied roof forms. While it seeks to resist unsympathetic roof alterations that would harm the significance of positive contributors or uniform historic terraces, it does not preclude well-designed roof extensions on neutral buildings where these respect scale, proportion and context. In this instance, the proposed mansard roof accords with that guidance.

In this context, the proposed mansard roof does not introduce an alien or incongruous form. Rather, it responds positively to its surroundings, particularly the larger-scale buildings nearby, and allows Elm Court to sit more comfortably within its setting. The proposal rationalises the existing roof form, which is currently visually heavy and poorly resolved, replacing it with a more coherent and traditionally proportioned crown that provides a clearer termination to the building.

The design of the roof extension has been carefully considered to ensure it reads as a subordinate and integrated addition. Fenestration at roof level aligns with the vertical rhythm of the elevations below, maintaining the building's established hierarchy and symmetry. The proportions of the inset windows are modest and well-spaced, and the use of high-quality slate tiles ensures material continuity with traditional roof treatments found elsewhere in the conservation area. The circular window on the principal elevation reinforces the building's axial composition and provides a focal point that relates directly to the main entrance below.

Concerns raised at pre-application stage regarding the site's "prominent" and "elevated" position, especially when ascending the hill, are not borne out when assessed against the actual impact of the proposals. While the building occupies a corner plot on a sloping street, visibility does not equate to harm. The proposed roof form is lower than existing, is frequently filtered by mature street trees (particularly during summer months), and would be perceived within a context that already includes mansard roofs and larger buildings along Cholmeley Park. As such, any views of the proposal would be experienced as part of a layered and varied townscape rather than as an isolated or dominant feature.



Image ascending the hill in Summer months



Image ascending the hill in Winter months (long view)



Image ascending the hill in Winter months (mid-view)



Image ascending the hill in Winter months (short-view)



Oblique aerial photograph looking west showing the site (red) and other buildings in the area that have mansard roof forms (see further images of these properties within the Heritage Statement (page 15))

In summary, the proposed roof alteration and mansard extension is considered acceptable in design and heritage terms for the following reasons:

- Elm Court is **not a listed building** and is **not identified as a positive contributor** to the significance of the Highgate Conservation Area; its existing roof form is of limited architectural or historic value.
- The proposal **reduces the overall ridge height** of the building when compared to the existing double-tiered hipped roof and does not result in an increase in scale or massing.
- The surrounding townscape is characterised by a **varied and mixed roofscape**, including mansard roofs, dormers and crown roofs, as acknowledged by the Council at pre-application stage and evidenced within the submitted Heritage Impact Assessment.
- Mansard roofs, while not dominant, are a **recognisable and established feature** within the conservation area and contribute to its architectural variety.

- The proposed roof form responds positively to its context, including **larger and more prominent nearby buildings**, such as Furnival House and residential blocks opposite the site.
- Any views of the development would be experienced **in context** with existing mansard roofs and are frequently filtered by mature street trees; visibility alone does not equate to heritage harm.
- The proposal introduces a **more coherent, traditional and visually resolved roof form** that improves the appearance of the host building.

The development therefore preserves the character and appearance of the Highgate Conservation Area, in accordance with Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 and relevant development plan policies. No harm to the significance of the conservation area arises, as confirmed in the accompanying Heritage Statement, and there is therefore no heritage-based justification for resisting the proposal.

Notwithstanding the above, even if the decision-maker were to conclude that the proposal gives rise to any degree of harm, such harm would be at the very low end of less than substantial harm, having regard to the neutral heritage value of the host building, the mixed roofscape context and the reduction in overall ridge height. In such circumstances, the NPPF requires that this limited harm be weighed against the public benefits of the proposal, including the delivery of additional housing on a small site, to which significant weight should be afforded.

Quality of Accommodation:

Policy DM1 of the DMDPD requires new development to ensure a high standard of privacy and amenity for the future occupiers, taking into account factors including daylight/sunlight, open aspect and overlooking impacts.

Policy DM12 of the DMDPD has regard to housing design and quality. All new housing should meet or exceed the minimum internal and external space standards of the London Plan and Mayor's Housing SPG. 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.

The proposed development has been carefully designed to ensure that all habitable rooms are served by sufficient natural light and have good quality outlook. By virtue of the relationship between the proposed dwellings, private external amenity spaces and neighbouring plots/properties, including orientation, oblique angles, intervening distance and landscaping and the positioning of windows, future occupiers would enjoy a high standard of privacy.

The GIA of each of the proposed new residential units are as shown via the table below as well as on the proposed plans submitted with the application. Each unit exceeds the minimum

requirements with respect to internal space and bedroom dimensions set out in Nationally Described Space Standards (2015), the London Plan (2021) and Mayor's Housing SPG (2016).

Unit Type	Location	Minimum standard	Proposed GIA
3-bedroom, 6-person (Garden Flat B)	Basement level	95sqm	125sqm
1-bedroom, 2-person (Garden Flat A)	Basement level	50sqm	54.70sqm
2-bedroom, 4-person (Flat 9)	Penthouse floor	70sqm	77.5sqm
2-bedroom, 4-person (Flat 10)	Penthouse floor	70sqm	80.6sqm

Each of the new residential units would be served by high-quality external amenity space in the form of private courtyards to the garden flats and terraces to each habitable room in the penthouse flats. All future residents also have continued access to the communal garden to the rear of Elm Court.

It is therefore considered that the proposed housing would provide a good quality standard of living for future occupiers, in line with Policy DM12 of the DMDPD and the corresponding aims and objectives of the London Plan (2021) and NPPF (2024).

Neighbour Amenity:

Policy DM1 of the Development Management DPD requires new development to ensure a high standard of privacy and amenity for neighbouring occupiers, taking into account factors including daylight and sunlight, outlook, overlooking, noise and other potential environmental impacts.

The proposed roof-level windows are modest in scale and are carefully positioned to minimise any potential overlooking. Where openings face neighbouring properties, separation distances are consistent with, or exceed, those typically found within the surrounding area. The proposal does not result in any material increase in height or bulk and would therefore not give rise to additional overshadowing or a loss of daylight or sunlight to neighbouring habitable room windows or private amenity spaces. Accordingly, the development would not result in unacceptable levels of overlooking or loss of privacy.

The proposed basement and roof works raise no specific concerns in relation to neighbouring amenity, having regard to their siting, scale, massing and design, and their relationship with neighbouring properties.

This position is consistent with the Council's pre-application advice, which confirmed that the proposed roof and basement works would not give rise to significant amenity impacts.

It is therefore considered that the proposed development would not result in unacceptable impacts on neighbouring amenity in terms of privacy, outlook, overbearing effect, or daylight and sunlight, and would comply with Policy DM1 of the Development Management DPD and the corresponding objectives of the London Plan (2021) and the National Planning Policy Framework (2024).

Basement Development:

Policy DM18 of the Development Management DPD confirms that basement development will be supported where compliance is demonstrated against criteria relating to structural stability, flood risk, neighbour amenity, arboricultural impacts, construction impacts and effects on the local natural and historic environment. Haringey's Draft Basement Guidance Note (2012) provides further guidance on the application of this policy. HNP Policy DH7 requires basements to meet relevant borough policy/supplementary guidance and to mitigate construction impacts.

As previously addressed, the proposed basement development would not result in unacceptable design, visual or heritage impacts. With the exception of modest and sympathetic external manifestations, including lightwells and windows kept close to the external walls of Elm Court, the basement is largely contained within the existing footprint of the host building.

The application is supported by a detailed Basement Impact Assessment (BIA), which demonstrates that the basement can be constructed without giving rise to unacceptable structural, hydrological or hydrogeological impacts. The assessment confirms that the site's ground conditions are suitable for basement construction and that the proposed underpinning and construction methodology would maintain the stability of the host building and surrounding properties. Predicted impacts fall within negligible to very slight categories when assessed against the Burland Damage Classification Scale.

The accompanying Tree Survey and Arboricultural Impact Assessment confirms that the proposed basement would not adversely affect any trees of townscape or amenity value and would have acceptable arboricultural impacts.

The proposed development therefore accords with Policy DM18 of the Development Management DPD, HNP Policy DH7 and relevant supporting guidance.

Flood Risk & Drainage:

Policy DM24 of the Development Management DPD requires new development to avoid and reduce flood risk to future occupants and to ensure that development does not increase flood risk elsewhere. Policy DM25 requires proposals to manage surface water as close to its source as possible in accordance with the drainage hierarchy and to incorporate Sustainable Drainage Systems (SuDS) where feasible. Policy DM26 requires development within a Critical Drainage Area to incorporate measures to reduce overall flood risk.

The Environment Agency Flood Map confirms that the application site is located within Flood Zone 1 and is therefore at low risk of flooding from tidal and fluvial sources. While the site lies within a Critical Drainage Area, it is not located within a Local Flood Risk Zone and is not identified as being at high risk of flooding from any source.

The application is supported by a site-specific Flood Risk Assessment and Drainage Strategy, which assess all potential sources of flooding and conclude that the site is at low risk from all sources, including surface water, groundwater, sewer flooding and reservoir failure. The site's elevated position on the Highgate ridge, together with the absence of nearby watercourses or recorded flooding incidents, further reduces flood susceptibility.

The proposed development incorporates a robust drainage strategy that delivers a significant reduction in surface water discharge rates compared to the existing situation, through the use of on-site attenuation and sustainable drainage measures. The proposals therefore represent a clear betterment over the existing drainage arrangements and would not increase flood risk on site or elsewhere.

The development is therefore considered to comply with Policies DM24, DM25 and DM26 of the Development Management DPD, and with the corresponding objectives of the London Plan (2021) and the National Planning Policy Framework (2024).

Trees and Biodiversity:

Policy DM1 of the Development Management DPD requires development proposals to demonstrate how landscaping and planting are integrated into the development as a whole, including appropriate consideration of existing trees and biodiversity. Policy DM18 of the DMPDP seeks to ensure that basement development does not result in the loss of, or long-term harm to, trees of townscape or amenity value. Policy DM19 requires that development avoids harm to ecological assets or, where this is not possible, provides appropriate mitigation. Policy DM21 seeks to maximise opportunities to enhance biodiversity on site.

HNP Policies OS2 and OS4 seek to protect mature vegetation and strengthen the Green Grid/biodiversity, in line with the above objectives.

The application is supported by a Tree Survey and Arboricultural Impact Assessment prepared by GHA Trees, which confirms that the proposed development would not result in harm to any trees of townscape or amenity value. The assessment also identifies appropriate tree protection measures to be implemented during construction to safeguard retained trees.

The proposed development does not involve the removal of trees or the loss of any significant habitats and would not have an adverse impact on biodiversity. The scheme is therefore considered to fall within the de minimis exemption from mandatory Biodiversity Net Gain requirements, as it does not exceed the relevant habitat impact thresholds set out in Schedule 7A of the Town and Country Planning Act 1990.

Overall, the proposal would have acceptable arboricultural and ecological impacts and accords with Policies DM1, DM18, DM19 and DM21 of the Development Management DPD and HNP Policies OS2 and OS4.

Transport & Parking:

Paragraph 116 of the National Planning Policy Framework confirms that development should only be prevented or refused on highways grounds where there would be an unacceptable impact on highway safety, or where the residual cumulative impacts on the road network would be severe.

Policy DM31 of the Development Management DPD promotes the use of sustainable modes of transport, while Policy DM33 confirms that development proposals will be assessed against the car and cycle parking standards set out in the London Plan.

London Plan Policy T5 seeks to encourage cycling by removing barriers and providing high-quality cycle parking in accordance with the London Cycling Design Standards. Policy T6 confirms that car parking should be restricted in line with public transport accessibility, with car-free development promoted in highly accessible locations and parking provision elsewhere limited to the minimum necessary. Policy T6.1 sets out maximum residential parking standards.

HNP Policy TR4 expects development in areas with good public transport access (PTAL 4+) to be car-free.

The site benefits from a Public Transport Accessibility Level (PTAL) of 4 and is located approximately 800 metres from Highgate Underground Station and approximately 1 kilometre from Archway Underground Station. The site is therefore reasonably well connected by public transport, and the proposed development is consistent with this level of accessibility.

The site currently accommodates car parking to the rear, including a row of garages and associated hardstanding, providing parking for existing residents. No changes are proposed to the existing access arrangements or parking layout.

The proposal does not seek to increase car parking provision and would not result in additional pressure on on-street parking or the surrounding highway network. Accordingly, the development would not give rise to highway safety concerns or unacceptable transport impacts.

Secure and convenient cycle parking and a dedicated refuse store is proposed to the rear of the site, adjacent to the existing garages, in accordance with London Plan standards and local guidance. The refuse store is positioned and designed to avoid impacts on neighbour amenity and would not obscure lightwells or basement windows, in accordance with HNP Policy DH8.

Overall, the proposed development accords with Policies T5, T6 and T6.1 of the London Plan (2021), Policies DM31 and DM33 of the Development Management DPD and HNP Policies TR3, TR4 and DH8 in respect of transport, parking, refuse and highway considerations.

Sustainability & Energy:

Policy SP4 of the Strategic Policies DPD, in line with the London Plan, requires new development to incorporate measures to reduce energy use and carbon emissions during design, construction and occupation. Policy DM21 of the Development Management DPD requires development proposals to demonstrate sustainable design, layout and construction, including application of the energy hierarchy to minimise carbon emissions.

The application is supported by an Energy Report prepared by Environmental Economics Ltd, which demonstrates that the proposed development has been designed in accordance with the London Plan (2021) energy hierarchy and relevant local policy. The strategy adopts a fabric-first approach combined with low-carbon building services to deliver substantial reductions in regulated carbon emissions.

The energy strategy has been assessed in accordance with the London Plan energy hierarchy:

- **Be Lean – Reducing energy demand:** Enhanced fabric performance exceeding Part L 2021 backstop requirements reduces space heating demand and delivers an estimated 11% reduction in regulated carbon emissions.
- **Be Clean – Efficient energy supply:** The potential for connection to a district heat network has been assessed; however, no viable network is available in the area.
- **Be Green – Renewable and low-carbon technologies:** The development proposes individual Exhaust Air Heat Pumps (EAHPs) to provide 100% of space heating and domestic hot water, supported by Waste Water Heat Recovery (WWHR) systems. These measures result in a 62% reduction in regulated carbon emissions compared with the Part L 2021 notional baseline, exceeding London Plan and local policy requirements.

All EAHP equipment is located internally, with no external plant or rooftop equipment proposed. As such, the development would not give rise to visual, noise or amenity impacts. No active cooling is proposed, and overheating risk will be addressed at detailed design stage in accordance with Approved Document O of the Building Regulations.

The submitted Energy Report confirms that the proposal complies with Policy SP4 of the Strategic Policies DPD and Policy DM21 of the Development Management DPD, and accords with the energy and sustainability objectives of the London Plan (2021) and the NPPF.

Summary:

For the reasons set out in this letter it is considered that the proposed development constitutes sustainable development in accordance with the National Planning Policy Framework. The proposal is in accordance with the adopted development plan and there are no over-riding material planning considerations which suggest the development should not be determined anything but positively in accordance with the adopted development plan.

Accordingly, planning permission should be granted having regard to the absence of heritage harm and the significant public benefits of optimising a small site to deliver four additional homes.

I trust this letter and the enclosed documents provide you with sufficient information to determine the application but if you require any points of clarification or have any questions, please do not hesitate to contact me.

Yours faithfully

Danielle Shaw
Senior Planner
SM Planning