

Date of meeting: 14th May 2024

Site Address: 73-77 Clarence Road, London, N22 8PG

Proposal: Additions and alterations to existing buildings to increase the number of residential flats on site by three.

Attendees:

Graham Eades – Hawkins Eades Associates

James Joyce – Hawkins Eades Associates

Mark Chan – Senior Planning Officer

Ruth Mitchell – Conservation Officer

1. SITE DESCRIPTION

The application site relates to a pair of semi-detached two-storey buildings located on the northwestern side of Clarence Road. The buildings have been converted into residential flats with the existing housing mix being 2no. 1-bedroom, 2no. 2-bedroom and 2no. 3-bedroom. The site is located within the Bowes Park Conservation Area (CA) and has been designated as a positive contributor to the CA. It is also within the Family Housing Protection Zone.

2. RELEVANT PLANNING HISTORY

HGY/2020/2714 – Demolition of the existing buildings and erection of two linked-blocks supporting eight self-contained residential flats (Use Class C3) with associated access, amenity and parking provision. Refused 18/12/2020. Appeal ref: APP/Y5420/W/21/3276893 – Appeal dismissed 22/03/2022.

HGY/2019/2468 – Demolition of the existing buildings and erection of two linked-blocks supporting nine self-contained residential flats (Use Class C3) with associated access, amenity and parking provision. Refused 25/10/2019.

PRE/2018/0034 – Demolition of the existing buildings and erection of one detached building for use as a 38 bed Care Home (Use Class C2) with associated access, landscaping and parking. Pre-application advice issued 13/09/2019.

3. RELEVANT PLANNING POLICY

- National Planning Policy Framework (2023) (NPPF)
- The London Plan (2021)
- Haringey's Local Plan Strategic Policies (2017) (Local Plan)
- Development Management DPD (2017) (DM DPD)

4. COMMENTS ON PRE-APPLICATION SCHEME

In response to the plans/information submitted and the discussions at the pre-application meeting, the following advice and assessment is provided by officers.

Proposed development

Additions and alterations to existing buildings to increase the number of residential flats on site by three. The additions and alterations include the replacement of the existing rear garage outbuilding with a single storey rear extension, addition of a first-floor rear extension at No. 73 and the enlargement and addition of a first-floor level to the rear extension at Nos. 75-77. The proposed works would facilitate the rearrangement of the internal layout the existing flats and increase of the total number of flats on site from six to nine (5no. 1-bed, 3no. 2-bed and 1-3-bed).

Principle of development

Policy DM16: Residential Conversions states the following:

A. To maintain a supply of larger family homes to meet Haringey's housing need, the Council will only permit the conversion of a larger home(s) to small self-contained homes (Class C3) where:

a. It is located outside of the Family Housing Protection Zone as shown on Figure 3.1;

b. The gross original internal floor space of the existing dwelling is greater than 120m²;

c. The proposal satisfies all other relevant policies, including the minimum internal space standards, the provision of satisfactory levels of amenity space, privacy, daylight, parking and access, and adequate and convenient refuse storage and collection;

d. The resulting units achieve internal configurations that are practical and fit for purpose, including vertical and horizontal stacking arrangements that minimise noise transfer between homes, including neighbouring homes; e. The design of any external alterations does not detract from the appearance of the property or the street scene and, wherever possible, retains a single door to the front elevation of dwellings in residential areas;

f. The balance of hard and soft landscaping on the forecourt (including forecourts that are already substantially hard-surfaced) does not detract from the appearance of the property or the street scene; and

g. The proposal provides for a mix of unit sizes in line with Policy DM11.

B. Conversions within the Family Housing Protection Zone will only be considered acceptable where they comply with criteria (b - g) above and result in no net loss in the number of family sized units.

C. Where existing garden land is available the Council will seek to optimise the total amount of private amenity space and access to this space for residents.

D. All residential conversions should be supported by a car parking survey which demonstrates that there is residual car parking supply to meet the need created by the proposal.

The application site is a pair of semi-detached two-storey buildings that have been converted into 6no. self-contained residential flats (2no. 1-bed, 2no. 2-bed and 2no. 3-bed). The proposes alterations and additions to the host buildings would facilitate the rearrangement of the internal layout the existing flats and increase of the total number of flats on site from six to nine (5no. 1-bed, 3no. 2-bed and 1no. 3-bed).

Based on drawings submitted by the applicant, the original internal floorspace of the host buildings exceed 120 sqm. The applicant has also noted that the size of each flat would meet the national space standards and that each unit would have their own private amenity space.

The application proposes 3no. additional residential flats on the site; all 1-bedroom flat and as well as rearranging the internal layout of existing flats. The number of family sized units (3-bed or above) will decrease from 2no. to 1no., resulting in a net loss of one family size unit. Furthermore, the proposal would result in an overconcentration of 1-bed units.

Policy DM16 aims to prevent the loss of existing family sized units within the Family Housing Protection Zone and Policy SP2 aims to meet Haringey's housing needs. The proposal would result in a loss of a 3-bed family housing unit. In this instance, the proposed development does not comply with the requirements of Part A and B of the policy and is therefore unacceptable in principle.

Design & heritage

Local Plan Policy SP11 notes that development should be of the highest standard of design that respects local context, character and historic significance, so to contribute to the creation and enhancement of Haringey's sense of place and identity. Similarly, DPD Policy DM1 requires all new development to achieve a high standard of design. Proposals should relate positively to their locality having regard to: building heights, form, scale, massing, urban grain, building lines, plot/building widths, distinctive local architectural styles, detailing and materials.

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. Local Plan Policy SP12 and DPD Policy DM9 set out the Council's approach to the management, conservation and enhancement of the Borough's historic environment.

It is accepted that there is no adopted character appraisal for this conservation area (BPCA) and that the existing host buildings are not in the best condition. However, as noted by the Inspector in the Appeal decision ref: APP/Y5420/W/21/3276893, *“Despite the partial pebble-dashing of the building and ad-hoc extensions, the building makes a positive contribution to the significance of the BPCA. While these changes to the building are not sympathetic, the building remains an important feature within the BPCA due to its form, age, and remaining original features such as its central front door with cast-stone door surround, first floor windows with rounded heads, and attached former service wing.”* As such, in line with planning legislation and policy, any harm to the significance of a designated heritage asset would require clear and convincing justification, with harm being weighed against the other public benefits of such scheme. A Heritage Statement would be required with such an application.

The proposal as explained at the pre-application meeting includes the replacement of the existing rear garage outbuilding with a single storey rear extension, addition of a first-floor rear extension at No. 73 and the enlargement and addition of a first-floor level to the rear extension at Nos. 75-77.

Whilst similarly located as the existing garage outbuilding, the new single storey rear extension at No. 73 would be taller and a larger footprint than the existing with maximum height and width of 3.1m and 10.6m respectively. It would be built on the boundary with the west-facing rear garden of the neighbouring Clarence Court. Unlike the existing garage, the rear extension would connect with the host buildings at the rear of No. 73 and become part of the main buildings. This would result in a material impact on the form and layout of a positive contributor in the BPCA and disrespect the existing pattern of development in the locality. The rear extension, as proposed, is too big and wide and would result in adverse impact on the residential amenities of neighbouring properties and the character and appearance of the BPCA and the host buildings.

The addition of a first-floor rear extension at No. 73 has a relatively minor massing and a roof height that would be lower than the main roof. Due to its rear location, it would also not be visible from the street scene. The extension would also not introduce additional overlooking or lead to loss of privacy to neighbouring properties. As such, the rear extension is considered to be acceptable in principle.

The footprint, height and massing of the existing rear extension at Nos. 75-77 would increase significantly as a result the proposed enlargement and addition of a first-floor level to form a two-storey rear extension with hipped roof. The introduction of substantial massing to the first-floor level and the addition of a new roof would result in unsympathetic changes to the host buildings and further harm its historic and heritage value. Due to the curvature of Clarence Road, the new rear extension would be visible from the front and impact the street scene. The proposed rear extension at Nos. 75-77 would not be supported.

The applicant is encouraged to redesign the entire host buildings in order to add new units and floorspace instead of piecemeal extensions/additions which the current scheme is proposing. A complete redesign would lead to a comprehensive improvement of the site. It is noted that the front garden of the site is mostly hardstanding. The applicant is encouraged to increase the area of soft landscaping to enhance the appearance of the site. The sash windows with curved opening on the first floor should be replaced by timber framed windows that fit.

Lastly, as discussed in the pre-application meeting, the 3no. chimneys at the rear can be removed, the external walls of the host buildings can be painted brickwork and the installation of ASHP should be screened and not in the front of the property.

Quality of accommodation

London Plan Policy D6 requires housing development to provide adequately sized rooms with comfortable and functional layouts. Dwellings must at least have the gross internal floor area (GIA) set out in Table 3.1 of the London Plan and an acceptable floor to ceiling height should be delivered. Dual aspect dwellings should be maximised, and single aspect units should normally be avoided. This policy also requires sufficient daylight and sunlight to be supplied to new residential units, whilst also ensuring that overheating would be avoided. Private outdoor space should be provided for new dwellings, in line with the requirements of London Plan Policy D6.

A total of 9no. units (5no. 1-bed, 3no. 2-bed and 1no. 3-bed) would result from the proposed development. The applicant has not indicated how the external amenity spaces would be allocated to each unit nor provided GIA of each unit. Upon measurement, it is noted that some units, including Unit 4 (GIA = 35 sqm) fall below the requirements of the London Plan. The applicant is reminded to comply with space standards, provide acceptable floor to ceiling height, provide dual aspect accommodation and external amenity space for each unit.

London Plan Policy D5 requires all new development to achieve the highest standard of accessible and inclusive design, seeking to ensure new development can be used easily and with dignity by all. London Plan Policy D7 require that 10% of new housing is wheelchair accessible and that the remaining 90% is easily adaptable for residents who are wheelchair users. In this particular case a dwelling here should be designed to be compliant with Part M4(2).

Impact on amenity

London Plan Policy D6 outlines that the design must not be detrimental to the amenity of surrounding housing, in specific it is stated that proposals should provide sufficient daylight and sunlight that is appropriate for the context, while also minimising overshadowing. Furthermore, Policy DM1 requires proposals to provide appropriate sunlight, daylight and open aspects to adjacent buildings and land.

There is concern that the cumulative increase in the size and massing of the host buildings would be out of scale with and not relate well to the surrounding built environment. The new rear extension at No. 73 would be 10.6m wide and built up to the boundary with Clarence Court whilst the two-storey rear extension at Nos. 75-77 would only be 5m from the boundary. Overall, it would be visually overbearing to the Clarence Court to the rear.

It is accepted that there are existing opportunities to overlook into the rear garden areas of Clarence Court with the current buildings. However, the first-floor rear extension at No. 73 would not introduce additional overlooking or lead to further loss of privacy to the occupiers of Clarence Court.

Energy & Sustainability

Local Plan Policy SP4 outlines that the Council will promote measures to reduce carbon emissions and energy use from new buildings during design, construction and occupation. This policy requires all new residential development from 2016 onwards to be zero carbon. DM DPD Policy DM21 notes that all new development should implement sustainable design, layout and construction techniques. The energy hierarchy and cooling hierarchy should be applied to new developments. Building materials used should have high environmental performance ratings. Adverse impacts on the urban heat island should be minimised through design, layout, orientation, materials and the incorporation of green infrastructure, in line with London Plan Policy SI4.

Any future planning application must be supported by an Energy Report and Sustainability Statement to demonstrate compliance with the above policies.

Biodiversity Net Gain

In November 2023 (as a result of the Environment Act 2021), Biodiversity Net Gain (BNG) will become a mandatory part of the planning process. This will take effect from November 2023 for major planning applications and April 2024 for minor planning applications. Minor developments for the purposes of mandatory BNG are those:

- For residential: where the number of dwellings to be provided is between one and nine inclusive on a site having an area of less than one hectare, or where the number of dwellings to be provided is not known, a site area of less than 0.5 hectares; and
- For non-residential: where the floor space to be created is less than 1,000 square metres OR where the site area is less than one hectare.

All minor planning applications will be required to consider BNG requirements from the very on-set, prior to site design. A 'biodiversity gain plan' will need to be submitted with such applications documenting and describing how the development will achieve a 10% BNG, informed by a biodiversity metric assessment. It is understood that a standardised template for 'biodiversity gain plans' will be published in due course. If 10% BNG cannot be achieved within the red line boundary of the planning application site, offsite habitat creation would need to be relied upon and secured accordingly.

You are advised to consult Government and Natural England guidance on BNG including information on the small sites metric for the purpose meeting the requirements of this legislation.

Access, transport & parking

This site is located to the eastern side of Clarence Road, north of the junction with Truro Road. It has a PTAL value of 4 which is considered to be 'good' access to public transport services. 5 different bus services are accessible within 5 to 7 minutes' walk of the site, Bounds Green underground station is 9 minutes' walk away, and Bowes Park national rail station 8 minutes' walk away. The site is located within the Bounds Green East CPZ which has operating hours of 11.00 to 13.00 Monday to Friday. There is at present a single crossover accessing the off street parking area at the site.

At present over the two properties, it is detailed there are 6 flats in total. A previous application to demolish the existing properties and construct 8 new flats across to interlinked blocks was proposed, and this was refused, partly on transportation grounds with respect to the relocation of the site crossover to a location what would have reduced the on street CPZ bay provision at this location. The applicant appealed the decision unsuccessfully.

This proposal includes retention of the existing arrangements and the construction of three extensions to the properties, to enable the provision of an additional three one bedroom flats at the properties, and the enlargement of an existing one bedroom flat to a two bedroom flat. The existing flats appear to be a mix of different sizes but this should be confirmed. The applicant has indicated potential arrangements to accommodate 4 off street parking spaces within the site.

In transportation terms, the increase from 6 to 9 flats at the site is minor in terms of impacts and trip generation. It is understood from consideration of previous applications for this site that there are high parking demands on street in the locality of this site.

The development, should it progress to being formally consented, will therefore be appropriate for formal designation as a permit free/car free application, for which the applicant will need to meet the Council's administrative costs (£4000). This applies to the new/proposed units and the enlarged units, but ideally could apply to the whole site given off street parking will be available. The location within a CPZ and PTAL value of 4 mean it accords with the requirements of Policy DM32.

4 parking spaces are shown at the site, there appears to be two possible arrangements proposed. The London Plan (current standards) references a range of acceptable provision being 0.5 to 0.75 spaces per unit for outer London within table 10.3.

The layout and arrangements for bin and cycle storage would need to detail how this proposed parking would be able to be provided and the applicant would also need to demonstrate how the spaces would be accessed, and movements made into and out of the site to and from the highway. Swept path plots may be required for this.

Cycle parking to meet the numerical requirements of the London Plan will be needed, whilst this application is for the enlargement of one existing flat and the three new flats, it is suggested that ideally formal cycle parking be provided for all 9 flats at the site. It is hoped this could be achieved given the space available at the site. Full dimensional and layout details of the proposed arrangements for cycle parking, demonstrating adherence to the London Cycle Design Standards will be required.

It is also suggested any future application include detail of how the development will be built out given there are existing occupied flats at the site, and to detail how the works will be accessed and service, hence a construction method statement or Logistics Plan should accompany any future application.

Although acknowledging that fire safety compliance is a matter for Building Regulations, a Fire Statement or draft should be submitted with such a planning application given the difficult access arrangements with such a site.

5. INFORMATION REQUIRED FOR THE PLANNING APPLICATION

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

1. A standard full application form – all sections must be completed signed and dated
2. Planning application fee
3. CIL liability form
4. Location Plan – must be based on an up-to-date map and should be at a scale of 1:1250. The site boundary should be identified in red, with a blue line drawn around any adjacent land owned by the applicant
5. Existing Block/Site Plan – should show footprints of all existing buildings on site and should be at a scale of either 1:200 or 1:500
6. Proposed Block/Site Plan – should show footprints of all proposed buildings on site and should be at a scale of either 1:200 or 1:500
7. Existing Floor Plans & Elevations – full floor plans and elevations of existing buildings at a scale of either 1:50 or 1:100. Should also include street scene elevations
8. Proposed Floor Plans & Elevations – full floor plans and elevations of proposed buildings at a scale of either 1:50 or 1:100. Should also include street scene elevations
9. Section Drawings – should show the floor to ceiling heights and should be at a scale of either 1:50 or 1:100
10. Design & Access Statement (D&A).
11. Planning Statement (Optional)
12. Waste Storage Details (can be included in D&A)
13. Details of Cycle Parking
14. Energy Report
15. Landscaping Plan
16. Biodiversity Gain Plan

List of Relevant Contacts

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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.