

Planning Statement

Land to the rear of 17 Tower Terrace, Wood Green, London

For Mr Yousaf Khan

Prepared by Gracechurch Town Planning Ltd

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EXECUTIVE SUMMARY

1. This Planning Statement has been prepared by Gracechurch Planning Ltd, on behalf of Mr Yousaf Khan (“the applicant”), in support of an application for full planning permission submitted to the London Borough of Haringey (“the Council”) to authorise the demolition of existing structures and redevelopment of the site to create one new home including access and associated works at land to the rear of 17 Tower Terrace, Wood Green, London N22 6SX (“the site”).
2. The key planning consideration is the design of the proposal and its relationship to the surrounding area, and this is in the context of previous applications to develop the site, the issuing of a Lawful Development Certificate by a Planning Inspector which confirms that the existing structures are lawful, and pre-application advice provided by the Council.
3. This application follows the submission in 2021 for a three storey dwellinghouse with basement on the site that was rejected by the Council, principally on design and heritage grounds. In making its decision in December 2021, the Council confirmed the following:
 - the principle of the development for new housing in this location is acceptable;
 - the inclusion of a basement including the information provided to justify this with respect to Policy DM18 (Residential Basement Development and Light Wells) of the Development Management DPD was appropriate;
 - the quality of new home in terms of its internal layout and overall suitability for future residents;
 - that there would be no adverse impact on highway safety;
 - that there would be no adverse impact with respect to arboricultural or ecology matters; and
 - that no contribution for affordable housing would be required.
4. The design of the proposed scheme has been carefully considered and has been amended in response to the helpful advice provided by the Council as part of a pre-application engagement process and to respond to the issues raised in the 2021 application. Through this process, and by following expert advice provided on heritage, the proposed new home will preserve and maintaining the character and appearance of the Wood Green Common Conservation Area within which the site is located (albeit on the very periphery of this) and the setting of the adjacent locally listed buildings.

5. It is the applicant's view, informed by the expert heritage advice, that no harm will result from the proposed development with respect to designated heritage asset of the conservation area and the non-designated asset of the locally listed building. Rather, there will be a beneficial effect of the development upon the heritage assets, and Policy HE6 Part 2 of the National Planning Policy Framework directs that, in these circumstances, the proposal should be supported.
6. Policy HE6 Part 3 of the of the National Planning Policy Framework directs that any harmful effect to a heritage asset and its significance should be weighed against any public benefits resulting from the proposal. Without prejudice to the applicant's position that the development would not result in any harm to heritage assets and their significance, the public benefits of the proposal are:
 - development in a highly sustainable location within the built up area of Wood Green, with excellent access to local services and amenities, and good access to public transport options;
 - development of land that is classified as a 'small site', contributing to meeting the specific targets for this set out in Policy H2 of the London Plan;
 - constitute the incremental intensification of an existing residential area that is within PTAL Zone 6a and close to a town centre boundary;
 - development of previously-developed brownfield land, wholly in accordance national planning policy and the clear direction of the Government to promote a brownfield first approach to development new homes; and
 - provide of a home suitable for the applicant and his family suitable for a family, accessible via step free access; and
 - supporting economic growth and productivity through local construction jobs that will be created during the construction phase of the development and contributing to the economic prosperity of Haringey through additional expenditure in local shops and services which are accessible without private transport.
7. It is the applicant's position that these public benefits would substantially outweigh any impact on the effect on the assets and their significance if any harm is identified, allowing for considerable importance and weight to be afforded to such harm.
8. The proposal therefore represents a sustainable form of development, resulting in the development of one new home on a site that is previously-developed and that is acknowledged as currently having an adverse impact on the setting of important heritage assets.

9. The design of the scheme has ensured that the proposed development will not unacceptably harm the amenities of adjoining residents with respect to privacy, outlook, sunlight and daylight or an unacceptable sense of enclosure, and the preservation of the neighbours' amenities. The new home will:
- exceed the national / London Plan minimum space standards with respect to its internal area and floor to ceiling heights;
 - have an outdoor garden of a size that will meet the minimum standards, and will provide high-quality outdoor amenity space;
 - have good levels of outlook and daylight via triple aspect glazing; and
 - have a functional layout suitable for the level of occupancy.
10. The proposed development is in accordance with local, regional and national planning policy, and there is an identified need for new homes in this area, as confirmed as the Council cannot demonstrate a full five year supply of housing land – this was confirmed at a recent appeal decision ref. APP/Y5420/W/24/3356480 at The Grove Lawn Tennis Club, Cascade Avenue, Hornsey, Haringey, London N10 3PS.
11. The assessment set out in the Planning Statement demonstrates that the proposed development will be in accordance with the policies of the development plan, and so the plan when taken as a whole. It therefore constitutes sustainable development that should be supported.
12. Policy S3 of the National Planning Policy Framework directs that proposals that are in accordance with the development plan should be approved without delay – as per the assessment in this statement, this is the case.
13. Furthermore, the site to be developed is within a settlement, and therefore Policy S4 of the National Planning Policy Framework is applicable. This sets out that (emphasis added)
- Development proposals within settlements should be approved unless the benefits of doing so would be substantially outweighed by any adverse effects, when assessed against the national decision-making policies in this Framework.***
14. The national decision-making policies in the Framework are supportive of the proposed development. Any adverse effects that could be identified when having regard to the national decision-making policies in the Framework would not reach the threshold of 'substantially outweighing' the presumption in favour of granting permission for a new home within a settlement, particularly in the context of the

clear and pressing need for such homes in the area and when taking into account the public benefits.

15. We respectfully request that the Council grants the full planning permission sought at the earliest opportunity.

THE APPLICATION SITE

16. The application site is land to the rear of 17 Tower Terrace, Wood Green, London N22 6SX. 17 Tower Terrace is a three storey end-of-terrace residential property that is located in the Wood Green area of the London Borough of Haringey. The property is on the corner of Tower Terrace and Mayes Road.
17. Originally the property was a single family dwellinghouse but planning permission was granted by the Council in 1972 to convert it into three flats (one on each floor). This permission was implemented and the property is currently in use as three flats.
18. At the rear of the main house are two garages and four portacabins, located behind a fence. An appeal decision (ref. APP/Y5420/X/23/3332527) dated 4 November 2024 has confirmed that the structure erected at the land to the rear are lawful (as set out in the first schedule of the decision letter):

The siting of garages and Portacabins (operational development) for purposes which are incidental to the dwelling house(s) and the installation of a means of access (engineering operation).

19. An image of the application site is set out in figure 1 below:



Figure 1: image of site (site photo)

20. The site is:

- not within the Metropolitan Green Belt;
- not in an area of risk of fluvial flooding as designated by the Environment Agency, or surface water flooding; and
- within the built-up area sustainable area of Wood Green.

21. The site is not a listed building but is within the Wood Green Common Conservation Area and the property at 17 Tower Terrace is locally listed as part of the terrace of properties.

22. The site has Public Transport Accessibility Level (PTAL) score of 6a, the highest score indicating one of the most accessible locations in London. The site is in the Wood Green Inner Zone CPZ Controlled Parking Zone (CPZ), the hours of which are Monday to Sunday, 8am to 10pm.

THE PROPOSAL AND THE APPLICATION

The proposal

23. The application seeks full planning permission for the demolition of existing structures and redevelopment of the site to create one new home, which is intended for the applicant's personal use, along with works associated with this.
24. The redevelopment of the site will comprise a single storey building above ground floor level with a basement. It is proposed to complete the main façade in a London yellow stock brick, matching the host building and other houses in Tower Terrace. Vertical timber cladding is proposed as a secondary material, to be used surfaces facing the adjacent gardens. The gates, rainwater goods and railings will be dark-grey metal. The roofs are proposed as biodiverse wildflower green roofs, and the glazing will incorporate dark grey slimline aluminium profiles.
25. Amenity space in the form a 55 sq m of garden and 14 sq m of sheltered patio is proposed.
26. To accommodate needs of the additional residents, refuse and recycling bins are to be provided in a discreet location at the front of the site in secure area that will only be accessible to the residents of the home. Cycle storage will be accommodated in a secure cycle locker to the rear of the property.
27. The application proposes to retain the existing off-street car parking space that is on the site, with access from Mayes Road.

Application plans and documents

28. In addition to this statement and the application and CIL forms prepared by Gracechurch Town Planning, the following plans (prepared by AR Architecture) and documents are submitted in support of it:
 - Location Plan ref. 3.100.100 Rev A;
 - Existing Site Plan ref. 3.100.101 Rev A;
 - Existing South Elevation ref. 3.100.102 Rev A;
 - Existing East Elevation ref. 3.100.103 Rev A;
 - Existing North Elevation ref. 3.100.104 Rev A;
 - Proposed Plan Basement ref. 3.200.100 Rev A;
 - Proposed Plan Ground Floor ref. 3.200.101 Rev A;
 - Proposed Plan Roof ref. 3.200.102 Rev A;
 - Proposed South Elevation ref. 3.200.103 Rev A;
 - Proposed East Elevation ref. 3.200.104 Rev A;

- Proposed North Elevation ref. 3.200.105 Rev A;
- Proposed Section 1-1, 2-2 ref. 3.200.106 Rev A;
- Proposed Section 3-3 ref. 3.200.107 Rev A;
- Arboricultural Survey and Impact Assessment prepared by SJA Trees;
- Basement Report prepared by Concept Consultancy Structural Designers;
- Design and Access Statement prepared by AR Architecture; and
- Energy and Overheating Statement prepared by NRG Consulting; and
- Heritage Impact Assessment prepared by MVHC.

BACKGROUND AND PRE-APPLICATION ENGAGEMENT

29. The applicant sought the Council's pre-application advice in connection with the potential to develop the site in 2017 prior to submitting a full application that was subsequently rejected.
30. Following this, the applicant sought pre-application advice again (ref. PRE1003184), putting forward an amended scheme in 2022 that sought to respond to the concerns raised by the Council in its decision on the 2021 planning application. A meeting was held with planning officers on 24 November 2022. At that meeting, one of the principal concerns raised was that the existing structures on the site did not benefit from planning permission. The consequence of this is that the Council indicated it could not give significant weight to the existing site condition as part of any assessment of a proposal to redevelop it.
31. In response to this, the applicant submitted a Lawful Development Certificate application (ref. HGY/2023/0411) that sought to regularise the use of the portacabins and garages at the rear of the site. The case made was that these had been in continuous residential use for a period in excess of 10 years, and the portacabins in place for a period in excess of four years.
32. While this application was refused by the Council, a subsequent appeal (ref. APP/Y5420/X/23/3332527) was allowed on 24 November 2024. The Planning Inspector's Lawful Development Certificate set out the following:

The erection of the garages, the installation of the portacabins and the formation of a means of access to the highway constitute development within the meaning of section 55 of the Town and Country Planning Act 1990 as amended, for which planning permission is required. Planning permission was granted for the erection of the garages in 1972 and together with the access and portacabins were in place and substantially complete at 17 Tower Terrace by 2017 at the latest. This is more than four years before the date of the application. Furthermore, the operational and engineering development do not contravene the requirements of any enforcement notice in force.

The various uses of the garages and portacabins are lawful as they have not resulted in a material change of use of the property. The uses are incidental to the residential use of the property and do not amount to development in themselves. They also do not contravene the requirements of any enforcement notice in force.

33. Following this, in early 2026 the applicant engaged further with the Council’s heritage team. An amended scheme that proposed just one single storey of new development above ground level was provided, and the Council’s Senior Conservation Officer commented that a reduced scale of new building “...*would be a welcomed step in the right direction.*” In addition, the Senior Conservation Officer advised that “...*any design here should probably look to maintain a separate boundary wall, or the appearance of one, along the street - replacing the existing timber fencing*” and “*a building which has a more subtle approach to its architecture would be a more appropriate addition. I would suggest using natural materials which use the existing colour palette from the site’s context would seem to be a sensible starting point.*”

PLANNING ASSESSMENT

The development plan and policy and decision-making context

34. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that, if regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise.
35. The development plan comprises:
- the London Plan (2021); and
 - the Strategic Policies 2013-2026 (2013 and updated 2017); and the Development Management Development Plan Document (DPD) (2017) (and collectively, the ‘Local Plan’).
36. The Draft London Plan 2026 was published by the Mayor of London on 16 July 2026, and is now subject to a public consultation period that runs until 15 October 2026. Given the very early stage of this plan, it is not considered that any weight can be afforded to it at the current time.
37. The National Planning Policy Framework (August 2026) (“*the Framework*”) was published on 17 August 2026 and took effect immediately for the purposes of decisions on planning applications. The Framework sets out that:
- *It is a material consideration of critical importance... (paragraph 1)*
 - *Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise. The national decision-making policies in this Framework are a material consideration in making decisions and should be read alongside the policies in the development plan. (paragraph 3)*
 - *Development plan policies (or parts of those policies) which are materially inconsistent with national decision-making policies in this Framework should be given very limited weight. (Annex A paragraph 2)*
 - *When considering development proposals, local planning authorities should...a. Work with the applicant in a positive and proactive manner, where necessary seeking solutions to problems arising from initial proposals, to enable a timely decision; and b. Take a proportionate approach to the consideration of the planning matters raised by the proposals, in a way that reflects their scale, complexity and potential impact. (Policy DM3: Determining development proposals)*

38. Policy S3 of the Framework is entitled the ‘Presumption in favour of sustainable development’, and is the key overriding national decision-making policy. It sets out the following:
- 1. Decisions on development proposals should apply a presumption in favour of sustainable development. This means:*
- a. Policy S4 in this Framework should be applied when considering development proposals within settlements;*
- b. Outside settlements, policy S5 should be applied; and*
- c. In all locations, development proposals that accord with both an up-to-date development plan and the decision-making policies in this Framework should be approved without delay.*
39. The context for the decision on this application includes the planning history of the site – this is highly relevant as it frames the principal considerations for the assessment of the proposal.
40. As noted in the previous section, the site has an extensive planning history. This includes the following:
- OLD/1957/0648: widening of vehicular access to Mayes Road. Granted on 09/12/1957;
 - OLD/1972/1479: conversion to 3 self-contained flats and erection of 3 garages at rear. Granted on 05/07/1972;
 - OLD/1981/1539: erection of a garage on site of parking area to the rear. Granted on 16/12/1981;
 - HGY/2021/2984: erection of a single storey rear extension to the upper ground floor flat in the existing house; the erection of a new self contained three storey dwellinghouse with basement. Refused on 15/12/2021; and
 - HGY/2023/0411: Lawful Development Certificate for siting of garages and Portacabins (operational development) for purposes which are incidental to the dwelling house(s) and the installation of a means of access (engineering operation). Refused on 28/06/2023 and allowed on appeal 04/11/2024.
41. Most pertinent to the current application are application refs. HGY/2023/0411 and HGY/2021/2984. With respect to the former of these, the Planning Inspector’s issuing of a Lawful Development Certificate has confirmed that the existing structures on the site are lawful both in terms of:

- (a) the built form – the portacabins and garage structures, as well as the access, are permitted to be on the site and now form the baseline in visual, massing and heritage terms for any assessment of change to the site; and
 - (b) the use of the land – this is ancillary to the main residential use of 17 Tower Terrace on the basis that the activities undertaken by the applicant, i.e. film work, storage, picture framing materials, equipment and the carrying out of picture framing, do not constitute a material change of use of the site.
42. With respect to application ref. HGY/2021/2984, this was a full planning application that sought to redevelop the site for a large three storey (above ground level) 4-bedroom dwelling. The application was rejected by the Council for the following four reasons: overdevelopment, pattern of development, conservation and amenity. While it is noted that there were four individual reasons, there is a large degree of overlap on the first three, i.e. they relate to design matters that ultimately impact on the conservation area.
43. What is also pertinent is what the Council considered to be acceptable with respect to the 2021 application and so was in effect supportive of with respect to what was proposed at that time. This was:
- the principle of the development for new housing in this location;
 - the inclusion of a basement including the information provided to justify this with respect to Policy DM18 (Residential Basement Development and Light Wells) of the Development Management DPD;
 - the quality of new home in terms of its internal layout and overall suitability for future residents;
 - that there would be no adverse impact on highway safety;
 - that there would be no adverse impact with respect to arboricultural or ecology matters; and
 - that no contribution for affordable housing would be required.
44. The effect of this is that where there has been no material change in circumstances – such as local planning policy and site designations – matters that the Council judged to be acceptable with respect to the previous scheme should also be judged to be acceptable on this new one. This applies the key tenet of planning that decision makers should be consistent in their approach, and indeed *“not determining similar cases in a consistent manner”* is a reason that an award of full costs will be awarded at the planning appeal stage (Planning Practice Guidance Paragraph: 049 Reference ID: 16-049-20140306 Revision date: 06 03 2014).

45. Whilst there has been no material change in local planning policy and site circumstances, there have been three other changes in circumstances since the 2021 application. Firstly, and as noted above, the decision of the Planning Inspector to grant a Lawful Development Certificate has confirmed that the existing structures on the site are lawful both in terms of the built form and their use. The effect of this is that these existing structures now form the baseline in visual, massing and heritage terms for any assessment of change to the site. An assessment of these matters is set out in further detail below and in the supporting documents to the application (notably the Design and Access Statement and the Heritage Impact Assessment), but it is the case that the Council must accept that the existing structures on the site are lawful and represent a feature that now forms part of the character and appearance of the conservation area and the setting of the locally listed building.
46. In addition, in August 2024 the Council updated its validation requirements. This application has responded to this by providing the documents the Council now considers are required to enable an assessment of this type of development.
47. Further, and crucially, the Government's publication of the latest Framework is a material consideration of critical importance, and set out below, this gives strong support for the proposal.
48. Give this, it would be unreasonable for the Council to identify concerns with a proposal to develop the site now that were not identified back in 2021. In this respect, while this Planning Statement sets out an assessment of all planning matters, the key considerations are, in effect, whether the amended scheme as now proposed has addressed the two overarching concerns raised by the Council in the 2021 decision. These are:
- the design of the proposed development and its relationship to and effect on the character of the wider area including designated and non-designated heritage assets; and
 - the effect of the proposed development on the amenities of the existing nearby occupiers.
49. In addition to the two key considerations, an assessment of other relevant matters is set out below, and these comprise the following:
- the principle of the development for new housing;
 - living environment of the new home;
 - highway safety; and
 - other considerations including arboriculture, basement and energy strategy.

The effect of the proposed development on the character of the area, including heritage assets

50. Policy D1 of the London Plan sets out that development should have regard to the form, function and structure of an area, place or street and the scale, mass and orientation of surrounding buildings. Policy D3 indicates that new developments should be of a high quality with architecture that pays attention to detail.
51. Policy HC1 of the London Plan relates to the conservation of heritage assets. This policy requires new development to conserve the significance of heritage assets and their settings, by being sympathetic to the assets' significance and appreciation with their surroundings.
52. Policies DM1 and DM12 of the Development Management DPD set out the Council's requirements for high quality design. Policy SP12 of the Strategic Policies Local Plan seeks to maintain the status and character of the Borough's conservation areas. Policy DM6 of the Development Management DPD requires that proposals affecting conservation areas and statutory listed buildings should preserve or enhance their historic qualities, recognise and respect their character and appearance and protect their special interest.
53. Policy DP3 of the Framework is the national decision-making policy that sets out the key principles for making 'well-designed places'. It sets out a number of broad requirements, such as that development proposals should respond to their context and seek to integrate with and enhance their surroundings. Matters such as the arrangement of development plots and buildings and the use of materials are noted in this respect. In applying these principles, Policy DP3:1 also makes clear that:

This should not preclude innovation or change where appropriate, especially where an increased scale or density of development is justified in accordance with policies L2 and L3.

54. Part 2 of Policy DP3 sets out principles that may be relevant to the design of a development proposal. These are: liveability; climate; nature; movement; built form; public space; and identity.
55. Part 3 of Policy DP3 sets out that:

Development proposals should be refused if, without clear justification, they conflict with paragraph 1 of this policy or relevant aspects of the principles in paragraph 2, or with any explicit design standards set out in the development plan (including those in locally-specific policies, guides, codes or

masterplans). Substantial weight should be given to compliance with relevant development plan policies when assessing the design quality of proposals.

56. Policy L2 of the Framework is entitled ‘Making effective use of land’. It sets out the following:

Substantial weight should be given to the benefits where a development proposal would achieve one or more of the following...d. Creating additional homes or floorspace within settlements by using the airspace above existing residential and commercial premises, or through sensitive redevelopment or additional development within existing plots. Such proposals should:

- i. Be consistent with the overall street scene, other than where: it is appropriate to have larger buildings (such as at street corners, or where building upwards would not cause substantial harm to the character of a building and its surroundings); the development would not be visible from the street frontage; or where specific changes are provided for through a design code which forms part of the development plan;*
- ii. Maintain safe access and egress for occupiers and users, and acceptable living standards for residents and neighbours in terms of access to daylight, sunlight, privacy and external amenity space; and*
- iii. Where the development would involve the use of residential curtilages, not occupy more than twice the footprint of all the existing buildings on the site, and, following development, would retain at least 50% of the non-developed area within the curtilage of the existing buildings; unless additional development can be accommodated without harm to the overall character of the area, and taking into account the availability of infrastructure and the importance of locating development in sustainable locations (in accordance with policy TR3).*

57. Policy L3 is entitled ‘Achieving appropriate densities. It requires that proposals for development should “...make efficient use of land, taking into account the identified need for different types of housing and other development, local market conditions, the availability of infrastructure (including that supporting sustainable transport modes) and its scope for improvement, a site’s connectivity and the importance of securing well-designed, attractive and healthy places.” Part 2 of the policy sets out that to contribute to making efficient use of land:

a. Within settlements, development proposals for residential and mixed-use development should contribute to an increase in the density of the area in which they are situated. The only exception is where there is a clear justification that this is either inappropriate or not possible (for example, where the prevailing density is already very high, the nature of the accommodation required precludes higher densities, or where it would conflict with other policies in this Framework). In considering the potential to increase densities, the existing character of an area should be taken into account, in accordance with policy DP3, but should not preclude development which makes the most of an area's potential.

c. Where development proposals for residential or mixed-use schemes are within reasonable walking distance of a well-connected station (applying the definitions in the glossary at Annex B), a density of at least 35 dwellings per hectare should be achieved within the net developable area of the site. Higher densities – of at least 45 dwellings per hectare – should be achieved where the service frequency is at least twice that of the minimum required for a well-connected station. Exceptions to meeting these minimum standards should be made only in the case of...i. Sites which fall below the threshold for major development where it can be demonstrated that meeting the standard is either inappropriate or not possible.

58. Policy HE4 of the Framework relates to heritage assets and requires that they be “conserved in a manner appropriate to their significance and requires proposals affecting their significance, including any contribution made by their setting, to avoid or minimise harm and instead conserve their significance.”. Policy HE5 sets out that:

Development proposals affecting heritage assets should be accompanied by an assessment of the significance of the assets affected (including any contribution made by their setting) and of the potential effect of the proposal on their significance. The level of detail should be proportionate to the assets’ importance and no more than is necessary to understand the potential effect of the proposal on their significance.

59. Policy HE6 parts 2,3 and 4 set out the following:

- *Development proposals which would have a positive effect on a designated heritage asset should be supported.*

- *Any harm to a designated heritage asset will be a matter of considerable importance and weight, which should be dealt with in accordance with paragraphs 4 to 6 of this policy.*
- *Where a development proposal would harm the significance of a designated heritage asset the effect on the asset and its significance should be weighed against any public benefits resulting from the proposal. Important public benefits can include securing the long-term reuse of a vacant or underused listed building, and enabling energy efficiency and low carbon heating measures to be employed.*

60. The Design and Access Statement sets out a detailed analysis of the changes to the proposal compared to the previous schemes. In particular it notes that the following on page 5:

- The scale of the proposed development reflects its position at the edge of the conservation area and the original urban grain, and ensures that it remains subservient to the locally listed buildings in views to and from the Conservation Area.
- The new dwelling is proposed as a single-storey building with a basement. Its height aligns with the front boundary wall, such that the majority of the building remains concealed behind it. Elements projecting above the wall are set back from it and do not exceed the height of the existing outbuildings.
- The massing of the proposed house has been materially reduced to render it effectively “invisible” within the streetscape and to minimise its impact on the conservation area. The openness of the gardens and the visibility of the rear façades of Tower Terrace from Mayes Road are fully maintained.
- Only solid brick and timber-clad surfaces, reflecting the surrounding context, will be visible from the public realm and neighbouring properties; the glazed side elevations, framed in matching brickwork, will only be visible from within the development.
- The exterior of the proposed dwelling adopts a minimal and understated architectural language to sit comfortably within the conservation area and avoid competing with the adjacent locally listed buildings. The presence of the house within the streetscape is primarily expressed through a brick boundary wall replacing the existing timber fencing.
- The south façade facing the courtyard is formed as a modestly proportioned glazed brick arcade. The side and rear façades will be clad in timber to reflect the appearance of boundary fencing. The roofs are proposed as biodiverse green roofs.

- The overall perception of the house from within its curtilage will be that of a garden pavilion, while from the public realm the building will remain largely unseen, maintaining the impression of a garden behind the boundary wall.
61. With respect to the impact on the significance of the heritage assets, a detailed and robust Heritage Impact Assessment has been prepared in accordance with Policy HE5 of the Framework. This sets out the following analysis:
- The...ancillary structures occupying the rear of the site are of negligible heritage significance and make no positive contribution to the significance of No. 17 or the wider terrace (paragraph 6.5.1)
 - The proposal is considered to result in a minor magnitude of change and a beneficial heritage effect. It preserves the significance and setting of No. 17 Tower Terrace and the character and appearance of the Wood Green Common Conservation Area, and no heritage harm is identified (paragraph 10.1.8).
 - The magnitude of visual change is considered minor, resulting in a beneficial heritage effect. No harm is caused to the significance or appreciation of the surrounding heritage assets (paragraph 10.3.6).
 - The proposed scheme therefore preserves the character and appearance of the Wood Green Common Conservation Area and is consistent with the statutory duty imposed by Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 (paragraph 11.1.3).
62. On this basis, it is clear that the proposed scheme has been designed having regard to the preserving and maintaining the character and appearance of the conservation area and the setting of the locally listed buildings. It is the applicant's view, informed by the expert heritage advice, that no harm will result from the proposed development with respect to designated heritage asset of the conservation area and the non-designated asset of the locally listed building. Rather, there will be a beneficial effect of the development upon the heritage assets, and Policy HE6 Part 2 directs that, in these circumstances, the proposal should be supported.
63. However, in the event that the Council were to identify some harm, the extent of this would be very low, and, at its worse, would be to the setting of the heritage assets, rather than a direct impact on the assets. The setting of a heritage asset is just one component of its overall significance. The Secretary of State's judgment in appeal ref. APP/H5390/V/21/3277137 relating to Edith Summerskill House, Clem Attlee Court, London SW6 7TW confirms this position, where the Planning

Inspector noted at paragraph 12.50 of the report to the Secretary of State (dated April 2022) that:

In cases where the impact is on the setting of a designated heritage asset, it is only the significance that asset derives from its setting that is affected. All the significance embodied in the asset itself would remain intact. In such a case, unless the asset concerned derives a major proportion of its significance from its setting, it is very difficult to see how an impact on its setting can advance a long way along the scale towards substantial harm to significance.

64. Given that if there is an impact on the setting – and to be clear it is the applicant’s position that there would not be – the extent of the harm to the asset would be at the very lowest level. It would not, clearly, result in substantial harm to, or the total loss of, the significance of a designated heritage asset.
65. Policy HE6 Part 3 of the of the Framework directs that any harmful effect to a heritage asset and its significance should be weighed against any public benefits resulting from the proposal. Without prejudice to the applicant’s position that the development would not result in any harm to heritage assets and their significance, the public benefits of the proposal are:
- development in a highly sustainable location within the built up area of Wood Green, with excellent access to local services and amenities, and good access to public transport options;
 - development of land that is classified as a ‘small site’, contributing to meeting the specific targets for this set out in Policy H2 of the London Plan;
 - constitute the incremental intensification of an existing residential area that is within PTAL Zone 6a and close to a town centre boundary;
 - development of previously-developed brownfield land, wholly in accordance national planning policy and the clear direction of the Government to promote a brownfield first approach to development new homes; and
 - provide of a home suitable for the applicant and his family suitable for a family, accessible via step free access; and
 - supporting economic growth and productivity through local construction jobs that will be created during the construction phase of the development and contributing to the economic prosperity of Haringey through additional expenditure in local shops and services which are accessible without private transport.

66. It is the applicant's position that these public benefits would substantially outweigh any impact on the effect on the assets and their significance if any harm is identified, allowing for considerable importance and weight to be afforded to such harm.
67. The site constitutes previously developed land and the proposal is for the sensitive redevelopment of an existing plot, and in this context the Framework directs that substantial weight should be afforded to the new home proposed.
68. With respect to Policy L3 Part 2a the proposal will make efficient use of the site within a settlement and will make a modest contribution to increasing the density in a proportionate and commensurate way that responds to and reflects the character of the area. With respect to Policy L3 Part 2c, the application site has a PTAL rating of 6a, and is located approximately:
- 350m walk from Wood Green station; and
 - 550m walk from Alexandra Palace station.
69. The site is therefore within reasonable walking distance of two stations and would achieve a density of 43 dwellings per hectare. This level is wholly appropriate given the constraints of the site, including its character and location within a conservation area.
70. The proposal is therefore in accordance with Policies HC1, D1 and D3 of the London Plan, Policies DM1, DM6, DM9 and SP12 of the Council's Local Plan, and Policies DP3, L2 and L3 of the Framework, meeting their overarching requirements that development must be of high architectural quality, maintain and enhance the character and appearance of the area, and will safeguard the setting of the nearby designated heritage assets. Part 2 of Policy HE6 is engaged as the development would result in a beneficial effect upon the heritage assets, and so should be supported. Part 3 of Policy HE6 of the Framework is not engaged on the basis that there will be no harm to the designated heritage assets, and section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended) will be satisfied.

The effect of the proposed development on the amenities of the existing nearby occupiers

71. Policy D6 of the London Plan sets out that the design of new development should ensure that it provide sufficient daylight and sunlight for existing housing that surrounds the site.

72. Policy DM1 of the Development Management DPD sets out that new development should seek to ensure that a high standard of privacy and amenity for neighbouring occupiers is retained, particularly with regard to daylight, sunlight and privacy considerations.
73. Policy P3 of the Framework is entitled ‘Living conditions and pollution’. It sets out that development proposals should be appropriate for their location and that they should not give rise to, or contribute to, an unacceptable level of access to daylight and sunlight for neighbouring residents and occupiers.
74. As noted above, Policy L2 Part 1 of the Framework is supportive of making effective use of land, including and especially for new homes but also notes that such developments must ensure that there will be “*acceptable living standards for residents and neighbours in terms of access to daylight, sunlight, privacy and external amenity space.*”
75. With respect to the 2021 planning application, this sought development consisting of three storeys above ground floor. It is on this basis that the Council judged that the development sought would have had a harmful impact on the amenities of the occupiers of the neighbouring properties by virtue over being overbearing and overshadowing.
76. The current proposal is substantially different to the previous scheme, with just one storey above ground level now proposed. The Design and Access Statement confirms the following on page 6:
- The amenity space of the existing flats at No.17 will not be compromised by the erection of the new house, as the application site is limited to the footprint of the existing outbuildings.
 - No overlooking of adjoining properties will be introduced. The glazing on the south-east façade faces the blank gable wall of 146 Mayes Road. Windows facing north-west open onto an outdoor area sheltered by a glass canopy; this canopy incorporates reflective louvres designed to redirect sunlight into the patio while preventing views towards the rear façades of the existing houses on Tower Terrace. No balconies or roof-level terraces are proposed. Therefore, the amenity of adjoining buildings will not be adversely affected.
 - The proposals will have no impact on daylight to neighbouring properties, as the height of the proposed building matches that of the existing structures on the site.
77. The design the new building proposed has taken into account the amenities of the adjoining and nearby occupiers, ensuring that they will be maintained, and will

satisfy Policy D6 of the London Plan, Policy DM1 of the Development Management DPD and Policies P3 and L3 of the Framework.

The principle of the development for new housing

78. Policy GG2 of the London Plan seeks to make the best use of land, and Policy GG4 recognises the need for more homes and the provision of more choice to create a housing market that works better for all Londoners.
79. Policy H1 of the London Plan sets out the minimum ten year housing target for Haringey of 15,920 new homes which recognises the pressing need for more homes in the Borough.
80. Policy H2 of the London Plan, entitled ‘Small sites and small housing developments’, is relevant to the proposed development. It sets out that Boroughs should *pro-actively support* well-designed new homes on small sites. The supporting text to the policy at paragraph 4.2.1 sets out that (emphasis added):

*For London to meet its housing needs, small sites below 0.25 hectares in size must make a substantially greater contribution to new supply across the city. Therefore, **increasing the rate of housing delivery from small housing sites is a strategic priority**. Achieving this objective will **require positive and proactive planning by boroughs both in terms of planning decisions and plan-making**.*

81. The Policy itself sets out that this is to achieve the following objectives:
- significantly increase the contribution of small sites to meeting London’s housing needs;
 - diversify the sources, locations, type and mix of housing supply;
 - support small and medium-sized housebuilders; and
 - achieve the targets for small sites set out in Table 4.2.
82. Table 4.2 of the London Plan sets out that of the 15,920 new homes to be delivered in the Borough, small sites should accommodate 2,600 of these.
83. Paragraph 4.2.4 of the London Plan goes on to state (emphasis added):

Incremental intensification of existing residential areas within PTALs 3-6 or within 800m distance of a station or town centre boundary is expected to play an important role in contributing towards the housing targets for small sites set out in Table 4.2. This can take a number of forms, such as: new build, infill development, residential conversions, redevelopment or extension of existing buildings, including non-residential buildings and residential garages,

*where this results in net additional housing provision. **These developments should generally be supported where they provide well-designed additional housing to meet London's needs.***

84. London Plan Policy H10 encourages developments to offer a range of choices, terms of the mix of housing sizes and types.
85. The Mayor of London's Housing Supplementary Guidance (SPG) was adopted in March 2016. The Housing SPG highlights the importance of using previously developed brownfield sites for residential development to enable Boroughs to meet the housing targets set out within the London Plan.
86. Haringey's Strategic Policies document sets out that the Council will "*maximise the supply of additional housing to meet and exceed its minimum strategic housing requirement of 19,802 homes over the plan period from 2011-2026*" (Policy SP1, page 48). Policy SP2 makes clear that from 820 units per annum will be delivered between 2011-2014 and 1,502 units per annum between 2015-2026. The site is not located within a growth area or area of change. Rather, the site is located within an area designated by the Council for limited change (this being the vast majority of the Borough). Paragraph 3.1.9 of the Strategic Policies sets out that these are:

"...areas in which expected growth is likely to make only a modest but still important contribution towards the overall local development needs of the Borough through opportunities on identified previously developed land, and small scale infill and conversions. Development within these areas is likely to be more constrained by the local context and the capacity of existing local infrastructure and services and be of an incremental nature."

87. Policy HO7 of the Framework is entitled 'Meeting the need for homes'. It sets out the following:

In applying the policies in this Framework, substantial weight should be given to the benefits of providing homes which will contribute towards meeting the evidenced accommodation needs of the community, as identified through needs assessments prepared for the area of the local planning authority and other relevant evidence. This includes, but is not limited to, homes needed for different groups assessed under policy HO1.

88. Both the London Plan and the Council's Local Plan are supportive of new homes in this location. In particular, Policy H2 of the London is supportive of the development is small sites, with paragraph 4.2.4 noting that "*Incremental*

intensification of existing residential areas within PTALs 3-6 or within 800m distance of a station or town centre boundary is expected to play an important role in contributing towards the housing targets for small sites”. As noted above, the application site has a PTAL rating of 6a, and is located approximately:

- 130m walk from Wood Green Metropolitan Town Centre;
- 350m walk from Wood Green station; and
- 550m walk from Alexandra Palace station.

89. The development of the site is therefore wholly consistent with the London Plan’s promotion of incremental intensification.

90. The Local Housing Need target for open market housing in Haringey is 2,956 homes per year – this where average annual delivery in the Borough over the last three years has been just 1,128 homes. Furthermore, the Council:

- cannot demonstrate a full five year supply of housing land – this was confirmed at appeal decision ref. APP/Y5420/W/24/3356480 at The Grove Lawn Tennis Club, Cascade Avenue, Hornsey, Haringey, London N10 3PS; and
- has failed the most recent ‘Housing Delivery Test’, allowing just 3,385 homes to be built against a target of 4,748 over the three year period, i.e. 71% of delivery against the target.

91. There is therefore a significant and evidenced unmet need for new homes in Haringey, and the Framework directs that substantial weight should be afforded to the new home proposed.

92. The development proposed in the application is therefore wholly in accordance with and will meet the policy objectives set out in the London Plan, the Council’s Local Plan and the Framework.

Living environment of the new home

93. Policy D6 of the London Plan relates to the quality and design of new housing, and states that new housing should provide “*adequately-sized rooms (see Table 3.1) with comfortable and functional layouts which are fit for purpose and meet the needs of Londoners without differentiating between tenures.*” (Policy D6 Part A). Table 3.1 sets out the minimum internal space standards for new dwellings. Policy D7 of the London Plan sets out an expectation of providing step-free access.

94. Policy DM1 of the Development Management DPD sets out that new development should seek to ensure that a high standard of privacy and amenity for the future occupiers.
95. The proposed new home, which the applicant intends to live in, has been designed to achieve a high quality living environment. In particular, the new home will:
- have a gross internal area of 269.1 sq m, and so exceed the national / London minimum space standards of 79 sq m for a 2-bed 4-person dwelling set over two floors;
 - have floor to ceiling heights of 2.8 on the main ground floor level, and 4.1m within the basement level;
 - have high quality private amenity in the form of a 55 sq m garden and 14 sq m of sheltered patio;
 - be triple aspect with glazing on the east, south and west elevations, and will have five rooflights and large areas of glazed canopies. This will ensure very good outlook and daylight / sunlight levels; and
 - benefit from step-free access, with a platform lift connecting the entrance (at street level), the ground floor (at garden level) and the basement. This will ensure the needs of occupiers are met in terms of accessibility; and
 - have a functional layout suitable for the future occupants.
96. It is clear that the proposed development will achieve a high standard of accommodation for the future residents, wholly in accordance with Policies D6 and D7 of the London Plan and Policy DM1 of the Development Management DPD.

Accessibility, highway safety and parking

97. Policy T4 of the London Plan requires development to fully assess the impacts on the capacity of the transport network, and mitigate adverse impacts if required. Policy T5 seeks to provide secure integrated accessible cycle parking in line with the minimum standards set out in Table 10.2.
98. Policy SP7 of the Strategic Policies sets out that, to tackle climate change, improve local place shaping and public realm, and environmental and transport quality and safety, the Council will promote public transport, walking and cycling and seek to locate major trip generating developments in locations with good access to public transport. Policy DM32 of the Development Management DPD sets out that development proposals will be assessed against the car parking and cycle parking standards set out in the London Plan.

99. The application proposes to retain the existing off-street car parking space that is on the site, with access from Mayes Road.
100. Furthermore, the site is a sustainable and very accessible location, with access to public transport, include several bus stops serving multiple locations in very close proximity. The site is well served by amenities afforded in the local area, including shops and other commercial uses in Wood Green Metropolitan Town Centre which is located an approximate 130 m / 2 minute walk to the north of the site. To the immediate west of the site is Wood Green Park, and Alexandra Park is an approximate 700m / 11 minute walk from the site.
101. As required by Policy T5 of the London Plan, secure and covered cycle storage is proposed to be provided.
102. There will be no adverse transport impacts from the development and safe access to the site will be provided. The proposed development will comply with Policies T4, T5 and T6 of the London Plan, Policy SP7 of the Strategic Policies and Policy DM32 of the Development Management DPD.

Other relevant considerations

Trees and biodiversity

103. Policy G7 of the London Plan notes that development proposals should, wherever possible, retain existing trees of value. Policy G6 of the London Plan requires development to protect and enhance biodiversity Policy DM1 of the Development Management DPD requires development proposals to seek to integrate landscaping and planting whilst safeguarding existing trees and biodiversity assets. Policies DM18 and DM19 seek to ensure that development, including basement development, does not result in unacceptable harm to trees, ecological assets or the wider natural environment.
104. With respect to trees, the submitted Arboricultural Implications Report confirms the following on page 24:
- There is no ancient woodland, woodpasture or parkland within or abutting the site and consequently the proposals will cause no loss of or harm to irreplaceable habitat.
 - Our assessment of the impacts of the proposals on the existing trees concludes that no ancient, veteran, or notable trees, no category 'A' or 'B' trees, and no trees of high landscape or biodiversity value are to be removed. No trees that make an important or significant contribution to the character of the local landscape are to be removed. The proposed removal of trees will

not have an adverse impact on the arboricultural character and appearance of the local landscape or the conservation area.

- No trees will require pruning in order to facilitate the proposals.
- The incursion into the Root Protection Area of the tree to be retained is minor, and subject to implementation of the measures recommended on the Tree Protection Plan, no significant or long-term damage to its root system or rooting environment will occur.
- The proposed dwelling will not be shaded by retained trees to the extent that this will interfere with its reasonable use or enjoyment by incoming occupiers, which might otherwise lead to pressure on the Local Planning Authority to permit felling or severe pruning that it could not reasonably resist.
- The size and disposition of the proposed dwelling is such that in our assessment it will not be unduly shaded and will receive reasonable sunlight and daylight. Its use is thus unlikely to lead to future demands for felling or severe pruning of trees.

105. With respect to Biodiversity Net Gain, the proposal falls within the statutory de minimis exemption as it does not involve the loss of any priority habitat and does not exceed the relevant habitat impact thresholds set out under Schedule 7A of the Town and Country Planning Act 1990 (as amended). However, the proposed development will contribute to biodiversity through the provision of a wildflower green roof, returning over 60% of the currently derelict site to the green realm. The proposed planting within the private realm of the site will be a mix to attract bees and other natural pollinators.

106. The proposed development is compliant with regional planning policy, including Policies G6 and G7 of the London Plan, as well as with local planning policy in the form of Policies DM1, DM18 and DM19 of the Development Management Policies Document

Energy

107. Policy S12 of the London Plan sets out a target of a 35% reduction on Building Regulations 2021 Target Emission Rates (TER) achieved on site. Policy SP4 of the Haringey Local Plan Strategic Policies requires all new residential development to achieve a minimum 25% reduction in total (regulated) CO2 emissions in line with Code for Sustainable Homes Level 4 energy standards, and should aim to achieve level 6. Policy DM21 of the Development Management Document requires new development to use sustainable design to apply the energy hierarchy to minimise

energy use in order to meet/ exceed, minimum carbon dioxide reduction requirement.

108. This application is accompanied by an Energy and Overheating Statement which confirms that the development will comply with Part L figures and local and national requirements in energy efficiency. The report confirms the following on page 3:

- U-Values have been set to maximise fabric efficiency and reduce energy demand.
- High efficiency LED lighting will be provided to all fittings.
- Mechanical ventilation with heat recovery is proposed.
- A very low Air Permeability rate will be sought.
- An Air Source Heat Pump will be used to generate renewable energy
- The proposal will allow a 77.1% reduction from CO2 emissions, when compared against the Part L TER benchmark.

109. The proposed development will be wholly in accordance with the Policy S12 of the London Plan and Policy SP4 of the Strategic Policies and DM21 of the Development Management Document.

PLANNING BALANCE AND OVERALL CONCLUSION

110. The assessment above demonstrates that the proposed development will be in accordance with the policies of the development plan, and so the plan when taken as a whole. It therefore constitutes sustainable development that should be supported.
111. Policy S3 of the Framework directs that proposals that are in accordance with the development plan should be approved without delay – as per the assessment in the previous section, this is the case.
112. Furthermore, the site to be developed is within a settlement, and therefore Policy S4 of the Framework is applicable. This sets out that (emphasis added)

Development proposals within settlements should be approved unless the benefits of doing so would be substantially outweighed by any adverse effects, when assessed against the national decision-making policies in this Framework.

113. The national decision-making policies in the Framework are supportive of the proposed development, as set above. Any adverse effects that could be identified when having regard to the national decision-making policies in the Framework would not reach the threshold of ‘substantially outweighing’ the presumption in favour of granting permission for a new home within a settlement, particularly in the context of the clear and pressing need for such homes in the area and when taking into account the public benefits.
114. We respectfully request that the Council grants the full planning permission sought at the earliest opportunity.