



Spring Dene Care Homes

SPRING LANE, MUSWELL HILL

Planning Statement



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Planning Statement

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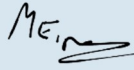
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CONTENTS

EXECUTIVE SUMMARY

1	INTRODUCTION	2
2	SITE AND SURROUNDING AREA	4
	BACKGROUND AND SITE DESCRIPTION	4
	PLANNING HISTORY	4
	EXISTING BUILDING	6
3	THE PROPOSAL	8
3.2	PRE-APPLICATION ADVICE	9
	USE AND AMOUNT	12
	LAYOUT	12
	SCALE AND MASSING	12
	PUBLIC REALM AND LANDSCAPING	12
4	POLICY CONTEXT	14
4.2	NATIONAL PLANNING POLICY FRAMEWORK (NPPF)	14
	Achieving sustainable development	14
	Promoting sustainable transport	14
	Making effective use of land	15
	Achieving well designed places	16
	Conserving and enhancing the historic environment	16
	HARINGEY LOCAL PLAN (2017)	17
	HARINGEY DEVELOPMENT MANAGEMENT DEVELOPMENT PLAN DOCUMENT (2017)	18
	LONDON PLAN (2021)	19
5	PLANNING CONSIDERATIONS	20

6	MATERIAL CONSIDERATIONS	27
6.1	DAYLIGHT AND SUNLIGHT STUDY	27
6.2	DESIGN AND SUSTAINABILITY	27
6.3	ENERGY AND SUSTAINABILITY	27
6.4	HERITAGE	28
6.5	TRANSPORT	28
7	CONCLUSION	30
	SCHEME BENEFITS	30

APPENDICES

APPENDIX A

PRE-APP RESPONSE FROM HARINGEY COUNCIL

EXECUTIVE SUMMARY

Full planning is sought for the following standalone building and associated works:

“Three-storey standalone building to provide Use Class C2 accommodation with basement link to existing care home, amenity space, landscaping, new garden and cycle parking at existing Spring Lane Care Home, Muswell Hill”.

There is a significant need for more care accommodation in the local area and the site as an existing care home is ideally placed to meet this need. This proposal has been subject to extensive pre application discussions. The applicant has engaged an experienced design team which have reassessed the site to devise a scheme which is fundamentally different to the previous extension schemes, and achieves the essential additional accommodation but in a detached building in the grounds which is appropriate in design terms and fully addresses the previous reasons for refusal and dismissed planning appeal.

This application seeks a new detached building, of a scale and design to respect its context, nearby development and to be adequately set back from the locally listed buildings reducing the impact on the setting of these buildings compared to previous schemes. The previous applications sought to extend the current care home which is deemed a detractor in the conservation area. This proposal is fundamentally different in seeking a separate building, which takes a positive approach to the design and materials to produce a high-quality standalone building that complements the architectural style, scale, proportions, materials and details of the area.

In addition, the scheme proposes comprehensive façade improvements and alterations to the existing care home, including removal of the front awning, a sensitively designed entrance, replacement of windows, improvement to fenestration proportions, boundary improvements and addition of appropriate architectural detailing. This significantly improves the existing building’s appearance and its contribution to the conservation area, taking it from a detractor to a neutral and arguably positive building.

The extensive technical assessments submitted demonstrate that the proposed development will not give rise to any significant adverse impacts on the area or amenity of nearby neighbours. Impacts can be successfully mitigated and overall from a heritage perspective the development will not cause any significant detrimental impact or harm upon the significance of nearby heritage assets, with any harm outweighed by the economic and social benefits the proposal will deliver.

The development therefore constitutes sustainable development and raises no material considerations which would outweigh its accordance with the Development Plan when taken as a whole.

The principle of development is therefore fully acceptable, and the proposal accords with policy.

1 INTRODUCTION

- 1.1.1. WSP has prepared this Planning Statement on behalf of Springdene Nursing & Care Homes Limited (the applicant). It supports a full application submitted to the London Borough of Haringey (the Local Planning Authority – HBC) for the following development:

“Three-storey standalone building to provide Use Class C2 accommodation with basement link to existing care home, including underground link for additional care home bedrooms, amenity space, landscaping, new garden and cycle parking at existing Spring Lane Care Home, Muswell Hill”.

- 1.1.2. In justifying the suitability of the proposed development, this Planning Statement assesses the development proposal against the Development Plan, relevant national policy and other material considerations. This Planning Statement is also accompanied by suite of plans and reports which provide detailed evidence and assessment upon which the content of this Planning Statement is based. This approach meets the requirements of Section 70(2) of the Town and Country Planning Act 1990, as well as Section 38(6) of the Planning and Compulsory Purchase Act 2004.

Background

- 1.1.3. Springdene Care Homes (the applicant) was set up in 1969 by a north London GP who developed a service for the community which has an excellent established reputation maintained by hand-picking and training very experienced managers and staff to exacting standards. The applicant has developed a number of care homes throughout the London area.
- 1.1.4. Springdene Care Homes has developed a conviction that the right balance of psychological, physical and environmental stimulation combined with a professional approach to care assist in leading a happy and fulfilling life.
- 1.1.5. The site has been the subject of a previous planning application for a four-storey and single-storey rear extension (addition of 14 additional care home bedrooms) which was refused in September 2020 and subsequently dismissed at appeal on the 25th of June 2021.
- 1.1.6. The main reasons for refusal and conclusions from the appeal are discussed further in section 2 of this submission.

Need for proposal

- 1.1.7. The rationale for developing a new building on site is to increase and improve the level of care and nature of care accommodation available on site to meet the varying care needs of the local population. The site comprises a main nursing home which offers a range of care suites, and this proposal seeks to provide larger care units suited to those residents or resident couples who have a higher level of independence, however still require easy access to the on-site care facilities and staff.
- 1.1.8. It follows on from recently approved planning permission (ref. HGY/2022/2494) which improves the existing host building by repositioning the front entrance, installation of new canopy, low wall and ramp and alterations to side entrance on Spring Lane. This is currently being implemented.
- 1.1.9. The strategy to improve the level of care and facilities forms part of a wider investment strategy by the care home provider across their current three care homes.

- 1.1.10. Designs have been revised following on from meaningful engagement with the LPA at pre application stage and now provide further improvements to the appearance and quality of the building so its design response minimises its impact on the significance of heritage assets and the Muswell Hill Conservation Area and to existing neighbouring dwellings. This has resulted in a proportionate reduction in bedroom numbers alongside a reduction in scale, massing and proposed building reorientation.

2 SITE AND SURROUNDING AREA

BACKGROUND AND SITE DESCRIPTION

THE SITE

- 2.1.1. The site comprises an existing large care home building and grounds in use as a garden, service area and car park.
- 2.1.2. It is located in a well-established urban residential suburb developed around a once rural settlement located in between Muswell Hill and East Finchley.
- 2.1.3. The site lies within the Muswell Hill Conservation Area. The part of the conservation area where the site is located is referenced sub-area 2 – Fortis Green. This area was developed over a 40-year period between 1896 and 1936 and primarily includes residential buildings. The site is typical of the built forms fronting Fortis Green, which are primarily four storey blocks of flats occupying larger plots, set back from the pedestrian highway by small front gardens, albeit it is a modern building which possesses little of the architectural merit of nearby buildings.
- 2.1.4. The site is within the setting of the Grade II listed The Gables (List Entry Number 1390723) and is adjacent to the non-designated heritage assets of Tetherdown Hall and associated cottages to the rear.

Figure 2-1 - Site location plan (Source: Google Earth)



PLANNING HISTORY

- 2.1.5. There have been a number of applications covering the site area and these are detailed in the table below:

Table 2-1 – Site Planning History

Application Ref	Description of development	Decision Date and outcome
HGY/2022/2494	Repositioning of front entrance, installation of new canopy, low wall and ramp and alterations to side entrance on Spring Lane	Approved November 2022
HGY/2020/0618	Erection of a four-storey and single-storey rear extension to add 14 additional care home bedrooms and activity lounge, new garden and amendments to existing car park	Refused September 2020.
HGY/2014/2546	Installation of lounge/dining room extension at rear fourth floor level, alterations to ground floor extension and alterations to existing 3 no 2 person flats and 1 no 3 person flat to form 11 bedrooms	Approved November 2014.
HGY/1991/0783	Erection of lounge/dining room extension at rear fourth floor level, alterations to ground floor extension and alterations to existing 3 no 2 person flats and 1 no 3 person flat to form 11 bedrooms.	Approved January 1992.

- 2.1.6. On 24 September 2020, Haringey officers recommended that an application for the '*Erection of a four-storey and single-storey rear extension to add 14 additional care home bedrooms and activity lounge, new garden and amendments to existing car park*' (Application Ref. HGY/2020/0618) be refused.

The application was refused on two grounds;

1. By virtue of the height, massing and detailing of the proposed extension it would result in an overly dominant structure fronting onto Spring Lane causing harm to the streetscape and character and appearance of this part of the conservation area, contrary to policies SP11 and SP12 and DPD policies DM1 and DM9 and London Plan policies 7.4, 7.6 and 7.8.
2. The proposed development by reason of its siting, height and scale would result in an overbearing structure leading to an increase in sense of enclosure to the detriment of the amenity of adjacent resident's contrary to DPD policies DM1 and DM12 and London Plan policies 7.4 and 7.6.

- 2.1.7. In their report, the case officer dealing with the refused application found that the principle of development was considered acceptable in that it provided much needed specialist accommodation addressing a specific need, however these benefits were outweighed by the impact on the character and appearance of the conservation area and the impact on neighbouring amenity.

- 2.1.8. In relation to ground 1 the objections can be summarised into three categories:

1. Bulk, scale and massing of the extension.
2. Materiality of the extension, including the use of zinc cladding.
3. Obscuring views of the locally listed buildings, particularly from Spring Lane and behind Tetherdown Hall when viewed from Tetherdown. Both vantage points are within the conservation area.

- 2.1.9. In relation to ground 2 the objection relates to the perceived overbearing impact on the adjacent houses' (Fireman's Cottages) amenity and a feeling of enclosure.
- 2.1.10. An appeal was subsequently submitted and dismissed on 25 June 2021 (PINS Ref. APP/Y5420/W/20/3264201).
- 2.1.11. The reasons for dismissing the appeal can be summarised along the following headings:
- Impact on Character and appearance and on the Muswell Hill Conservation Area; and
 - Impact on Living Conditions at Nos 8, 9 and 10 Fireman's Cottages.
- 2.1.12. The Inspector noted *'Its scale, combined with its design and detailing, including its extensive use of lead coloured metal cladding, would reflect the architectural design of the host building, which has been assessed by the CA as a detractor from the character and appearance of this part of the MHCA. It would therefore compound and exacerbate a harmful form of development in this part of the MHCA'*.
- 2.1.13. In relation to the views of the locally listed buildings the Inspector noted, *'It would also curtail certain public views from Spring Lane towards the attractive locally listed buildings to the west. It would also appear in glimpsed views between buildings from Tetherdown (to the east of the appeal site) and would look oversized and out of place when seen from this location'*.
- 2.1.14. The Inspector concluded that the proposal would result in less than substantial harm to the Muswell Hill Conservation Area, with the benefits of the increased capacity of the care home being insufficient to outweigh the harm, in accordance with paragraph 196 of the NPPF.
- 2.1.15. With regards to the impact of neighbouring dwellings at Fireman's Cottages, the inspector noted that proposal would be harmful to the living conditions enjoyed by occupants at these cottages as a direct result of the proposal's scale in close proximity while the extensive use of lead coloured metal cladding in parts of the extension would emphasise its overbearing presence. The inspector disagreed with the conclusions from the day light sunlight study.
- 2.1.16. The recent pre application process and fundamental change to the proposals to see a smaller stand along building address the previous concerns raised, whilst still achieving the accepted provision of care accommodation.
- 2.1.17. Most recently, as part of works to improve the existing care provision consent was granted for external works (to accompany internal reconfiguration works), (Ref. HGY/2022/2494), which included works to the entrance of the existing care home building.

EXISTING BUILDING

- 2.1.18. The existing building is a substantial five storey modern brick building, reducing to four storeys as it fronts Spring Lane. It has an L shape and comprises a main front section fronting Fortis Green where its entrance is at the corner. The top floor of this section is marginally set back with red clad infill panels and a dominant wide white fascia.
- 2.1.19. The building has aluminium and uPVC windows along with a flat roof. A total of 17 car parking spaces are provided at the rear.

Figure 2-2 - Existing Spring Lane Building (Source: Google Earth)



- 2.1.20. The east side of this front section abuts the adjacent three storey building, so presents a blank brick elevation on this section. At the rear of this front section there are plant rooms and lift overruns which give the total height of the building equivalent to 6 storeys.
- 2.1.21. The west elevation along Spring Lane presents a five storey brick elevation with a side entrance at the top of Spring Lane. Moving down Spring Lane, the elevation sets back in plan from the front section in two distinct re-entrant stages. Beyond the second stage is a four storey brick elevation with an additional aluminium clad mansard extension over half its length. The remaining half was designed as a balcony garden but is not used as such.
- 2.1.22. There is a small front garden taken up mainly with ramped paving, boundary walls and railings. There is limited landscaping and it presents a fairly austere frontage, discordant with other properties in the streetscene. The Spring Lane section is built hard up against the pavement. To the north of the building is the car park and a garden area. There is a further hard landscaped garden to the east of the rear leg of the building.
- 2.1.23. The internal layout of the existing building comprises the basement which houses staff rooms, offices, workshop and laundry. It is accessed via the main stairs, lifts and an external staircase from an open yard area. The ground floor houses the entrance, lounge, dining area, kitchen and various ancillary rooms. It also contains 6 residents' rooms in the rear leg. The first and second floors each house 15 bedrooms, a TV room and various stores and toilets. There are nurses' stations in the centre within the lift lobby. The third floor is similar but houses 14 rooms and a lounge area. The fourth floor has 12 bedrooms, various bathrooms, stores and a nurse's station and lounge.

3 THE PROPOSAL

- 3.1.1. The application is submitted in full and seeks permission for the following:
“Three-storey standalone building to provide Use Class C2 accommodation with basement link to existing care home, amenity space, landscaping, new garden and cycle parking at existing Spring Lane Care Home, Muswell Hill”.
- 3.1.2. The proposals are part of a programme of refurbishment works at the site with the aim to improve living conditions for existing residents of the care home. These form part of wider improvements including internal reconfiguration and refurbishment works (which do not require planning permission) which add en-suite WC facilities to existing rooms. The addition of the 6 new care suites will take the total number therefore to 68 suites.
- 3.1.3. In brief, the proposal comprises:
- Three-storey standalone building with basement level link to create 6 additional care suites with more space to allow occupation by couple sin need of care and to enable greater levels of independence whilst still receiving care;
 - Significant elevational improvements to the existing care home at 170 Fortis Green;
 - Reconfiguration and basement extension providing a new therapy pool, associated changing rooms, therapy room, and staff facilities for existing and future care home residents;
 - Ground floor communal space infill extension and enhanced landscaping to front of building;
 - Redevelopment of internal courtyard garden with landscaping;
 - Reconfiguration of existing rear parking area; and
 - Addition of cycle parking spaces.
- 3.1.4. The proposal is to provide residential care (Use Class C2) in conjunction with the existing C2 care home. The proposed development will be linked with communal facilities on the overall site.
- 3.1.5. The residents will be offered additional facilities in the suites such as basic cooking and en-suite bathrooms in order to maximise their privacy. The suites rooms will cater for single residents or couples defined as having a foreseeable physical, sensory, cognitive or mental health impairment with staff from the existing care home providing the care and support services.
- 3.1.6. The proposed development can accommodate people with a range of care needs including low, medium and high care categories. High care needs can include end of life care.
- 3.1.7. Springdene will provide professional support from a qualified nurse 24 hours a day, 7 days a week.
- 3.1.8. The proposals aim to create a tightly knit community unified by access to a dedicated enterprise of specialist care and security for the elderly.
- 3.1.9. Starting from the basement level, a physiotherapy room will be provided along with lobby areas, corridors, accessible WC and plant rooms. The connection to the existing care home will be undertaken at basement level.
- 3.1.10. A staffed and supervised physiotherapy suite would provide opportunities for exercise, maintaining fitness and maintaining mobility, as well as the potential for rehabilitation after surgery.

- 3.1.11. Each of the six suites are provided across three storeys and each feature a bedroom along with living facilities such as en-suite bathroom, limited cooking facilities and living/meeting area.
- 3.1.12. This ensures an improvement from the existing living conditions at the care home and aims to offer a higher level of quality care for future residents.

3.2 PRE-APPLICATION ADVICE

- 3.2.1. Given the detailed recent planning history and nature of the site and its context, the applicant has undertaken extensive pre-application discussions with HBC across a period of around 2 years. Three formal pre-application meetings have been held with Tania Skelli, Elisabetta Tonazzi (Conservation Officer) and Alikaterini Koukouthaki (Conservation Officer) at HBC, the first to discuss a revised extension scheme, and then following that advice, to discuss a new standalone building. These meetings were attended by members of the project team, including the applicant, architect, planning consultant and technical consultants (including heritage).
- 3.2.2. The key discussion points at the meetings included:
 - Master-planning of the site;
 - Relationships between the application site and the surrounding area;
 - Height, massing and architecture;
 - Heritage;
 - Public realm and townscape.
- 3.2.3. The first pre app was for a revised smaller extension to the main building. Officers considered this a better solution to that previously refused, however concerns were raised over a number of aspects. This led to a revised pre application for a smaller standalone building. The revised scheme resolves the issues raised, and the latest pre application advice (Appendix A) provides support for the scheme now sought:

'Host building facade improvement

The proposed façade improvements to the existing building throughout the front and side elevations are welcome and are intended as a mitigation effort to better respond to the design and character of the historic street frontage along Fortis Green.

New building

The siting, scale and height of the proposed new building may be acceptable depending on further information about its spatial and architectural relationship with the main building and existing houses, which is currently unclear, with the design of the proposed building appearing divorced from the improved facade design of the care home and the prevailing design of the surrounding, small scale residential buildings.

The architectural relationship between new building, care home and houses along Spring Lane should be demonstrated through detailed contextual elevations and sections along Spring Lane...'

- 3.2.4. The way the proposals overcome previous advice is set out in more detail below:

Addition of bulk to the rear of the existing building exacerbates its out of character scale

- 3.2.5. The proposed scheme is now for a separate building which therefore will not increase the scale of the existing building. Further, the scale of the new building is reduced compared to the previously proposed extension and reflects the scale of existing surrounding development.

Bulk and the design being out of character with the conservation area

- 3.2.6. The proposed scheme presents a reduction in bulk/scale and a revised design which relates strongly to the immediate context, most notably Fireman's Cottage, and therefore the character and appearance of the conservation area would be preserved.

Views along Spring Lane/Fortis Green being negatively impacted

- 3.2.7. The separation of the block from the existing building along with its set back from Spring Lane and reduced height mean that these views would not be adversely impacted.

Impact on the views and settings of the locally listed buildings

- 3.2.8. The separation of the new building and reduction in footprint and height, have thus increased its separation from the locally listed buildings to reduce impact on the setting of these buildings compared to previous schemes. Views through are preserved. Further, any visibility would be limited and would not affect the significance of these buildings.

The extent and nature of façade improvements offered to the existing building

- 3.2.9. The revised scheme proposes far more comprehensive façade improvements to the original care home, including removal of its awning, sensitively designed entrance, replacement of windows, improvement to fenestration proportions, boundary improvements and addition of appropriate architectural detailing. These changes take design cues from the character and appearance of the conservation area and offers public benefit in facilitating an improved appearance to the building, which will thus enhance the character and appearance of the conservation area, removing the negative contribution the existing building has on the character and appearance of the conservation area.
- 3.2.10. The proposals have been developed and incorporate major design changes to bring forward a proposal which is acceptable in planning policy terms and which also responds directly to comments made by planning and heritage officers during pre-application meetings together with the previous reasons for refusal:

- Reduction in car parking spaces from 16 to 12;
- Introduction of cycle parking with space for up to 8 cycles;
- Balcony element facing conservation area now removed within designs;
- Off set harm of additional extension bulk to rear of building through proposing a smaller standalone building with improvements to existing and landscaping;
- Generous reduction in scale and volume;
- Improvement to current gardens;
- Omission of balcony from facing conservation area;
- Enhance layout of rear courtyard garden; and
- Inclusion of cycle parking provision to frontage for visitors and rear for staff.

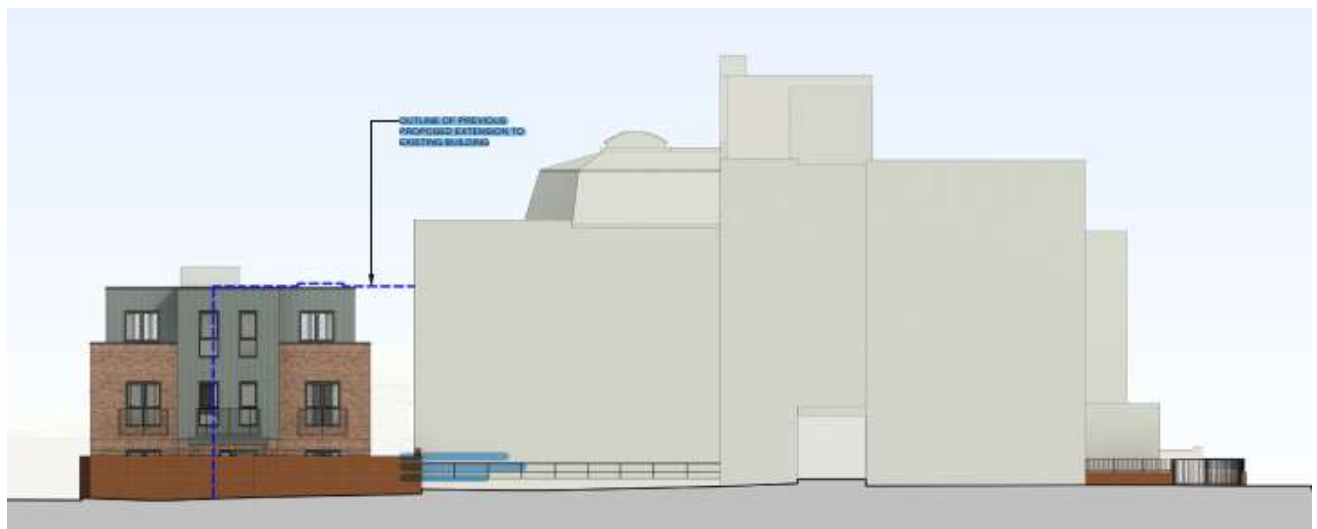
- 3.2.11. The density of the scheme has been carefully considered to ensure the site provides a comfortable amount of amenity space for the occupiers whilst keeping the new building to a minimum in volumetric terms (a significant reduction when compared to the previous scheme).

- 3.2.12. The revised design has taken into consideration overlooking and loss of privacy potentially arising from proposed windows on the East and West elevations to a number of neighbouring upper floor windows. These separation distances are considered to be acceptable in this context. The new design proposes a standalone building of smaller scale, separated and set away from the main building at the rear occupying an area of existing car parking.

Figure 3-1 – Previously proposed rear extension (2021) Side West Elevation (Spring Lane)



Figure 3-2 - Currently proposed rear standalone building West Elevation (Spring Lane)



The new standalone building has been designed with reference to neighbouring development, including 8-10 Fireman's Cottages on the opposite side of Spring Lane, with a masonry base and the top storeys featuring grey metal cladding and grey aluminium windows. The materials and roof form are consistent with the area.

USE AND AMOUNT

- 3.2.13. The proposal would provide 6 new bedroom suites, each featuring individual WC facilities including wash basin and showers. This range of unit sizes is considered appropriate for this development and this location and optimises the use of the site to meet the care home accommodation need.

LAYOUT

- 3.2.14. The Design & Access Statement prepared by RDT Architects provides a detailed assessment of the design approach for the care home extension which has been based upon a detailed site analysis.
- 3.2.15. The proposed building has been designed to create a high-quality building at this existing site.
- 3.2.16. The building will sit partly on existing car parking spaces and existing rear garden at Spring Lane. The car park and garden area are then reconfigured and improved.
- 3.2.17. The main entrances to the building are to be taken from the front the building fronting Spring Lane but set behind existing brick wall to ensure ease of access while servicing and deliveries continue to be undertaken from Spring Lane.
- 3.2.18. A path will run between the existing care home and proposed building leading to existing rear garden ensuring separation between both buildings.
- 3.2.19. The secure private garden area would be used to provide outdoor care for the residents of the home. There would not be any amplified music, cooking or other similar activities within these outdoor spaces.

SCALE AND MASSING

- 3.2.20. The scale and massing of the proposed development has been influenced by the site's surroundings. The architect has sought to achieve this through using different materials to break down different elements of the building to better respond to the neighbouring properties.
- 3.2.21. Overall, the proposed extension incorporates a high-quality design alongside a much reduced building mass when compared to the refused scheme that complements and enhances the character of the surrounding area.
- 3.2.22. A Design and Access Statement has been prepared by RDT Architects and is submitted in support of this application with detailed explanation of the rationale and justification behind the design of the proposals and should be read in conjunction with this planning statement.

PUBLIC REALM AND LANDSCAPING

- 3.2.23. The proposal includes a renewed residents' garden to be located directly east of the existing care home, abutting the new standalone extension. The side serviced access route will provide direct access to the car parking area. The proposed renewed garden area will provide a high-quality shared space with the provision of landscaping, garden furniture, lighting and cycle parking adjoining the parking area.
- 3.2.24. Proportionate soft landscaping will be undertaken within the curtilage of the site. Proposed landscape planting towards the western boundary of the extension will soften the street frontage and provide some level of screening to the proposed properties. Importantly, the introduction of new landscaping to the building's frontage to Fortis Green will make a strong contribution to the

conservation area, softening the frontage and providing a front garden area which reflects that of neighbouring properties and enhances the character of the conservation area.

- 3.2.25. The design principles will ensure that the proposed scheme reflects the high-quality aspirations for the site as set out within the Local Plan and will guarantee a truly exceptional piece of architecture especially when compared to the existing building.

4 POLICY CONTEXT

- 4.1.1. Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that planning applications should be determined in accordance with the Development Plan unless material considerations indicate otherwise.

THE DEVELOPMENT PLAN

- 4.1.2. The relevant development plan documents comprise of:

- Haringey Local Plan (2017);
- Haringey Development Management Development Plan Document (2017); and
- London Plan (2021)

- 4.1.3. Other material considerations include the National Planning Policy Framework (NPPF), Supplementary Planning Documents (SPDs), Planning Practice Guidance (PPG) and Regional Policy.

4.2 NATIONAL PLANNING POLICY FRAMEWORK (NPPF)

- 4.2.1. The NPPF was updated in September 2023 and is a key material consideration in the determination of planning applications. The following paragraphs and sections of the NPPF are considered relevant to the proposal.

Achieving sustainable development

- 4.2.2. Sustainable development means meeting the needs of the present without compromising the ability of future generations to meet their own needs (paragraph 7). The planning system has three overarching objectives in achieving sustainable development: economic, social and environmental (paragraph 8).
- 4.2.3. Planning should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area (paragraph 9).
- 4.2.4. At the heart of the NPPF is the ‘presumption in favour of sustainable development’ (“the presumption”) set out at paragraph 11, which establishes the planning principles in pursuing sustainable development in a positive way.
- 4.2.5. For decision-taking, this means approving development proposals that accord with an up-to-date development plan without delay (paragraph 11c).
- 4.2.6. The development meets the requirements of Paragraph 11 of the NPPF by offering a scheme that is sustainable, makes best use of brownfield urban land, improves the use and operation of an existing building and extends the provision of care home accommodation without the need to build on greenfield land.

Promoting sustainable transport

- 4.2.7. Paragraph 104 requires transport issues to be considered from the earliest stages of development proposals, so that the potential impacts on transport networks can be addressed; opportunities from existing or proposed transport infrastructure, technology and usage are realised; opportunities to promote walking, cycling and public transport use are identified and pursued; the environmental

impacts of traffic and transport infrastructure can be identified, assessed and taken into account; and patterns of movement, streets, parking and other transport considerations are integral to the design of schemes and contribute to making high quality places.

- 4.2.8. Paragraph 105 recommends significant development should be focused on locations which are or can be made sustainable. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas and this should be taken into account.
- 4.2.9. Paragraph 110 states in assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that appropriate opportunities to promote sustainable transport modes can be taken up, given the type of development and its location; that safe and suitable access to the site can be achieved for all users and any; that the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance including the National Design Guide and the National Model Design Code; and any significant impacts from the development on the transport network or on highway safety can be cost effectively mitigated to an acceptable degree.
- 4.2.10. The proposal aligns with the policies set out under Paragraph 110 of the NPPF by supporting the provision of high-quality care home beds within a sustainable location close to existing public transport networks and easily reached by active travel modes such as walking and cycling.

Making effective use of land

- 4.2.11. Paragraph 119 promotes an effective use of land in meeting the need for homes and other uses while safeguarding and improving the environment and ensuring safe and healthy living conditions.
- 4.2.12. Paragraph 122 states decisions need to reflect changes in the demand for land and be informed by regular reviews of land allocated for development in plans and of land availability.
- 4.2.13. Paragraph 124 supports development that makes efficient use of land, taking into account the identified need for different types of housing and the availability of land suitable for accommodating it; local market conditions and viability; the availability and capacity of infrastructure and services as well as their potential for further improvement and scope to promote sustainable travel modes that limit future car use; the desirability of maintaining an area's prevailing character and setting; and the importance of securing well-designed, attractive and healthy places.
- 4.2.14. Paragraph 125 makes clear where there is an existing or anticipated shortage of land for meeting identified housing needs, homes should not be built at low densities and ensure developments make optimal use of the potential of each site. Authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight where they would otherwise inhibit making efficient use of a site (as long as the resulting scheme would provide acceptable living standards).
- 4.2.15. The proposal seeks to capitalise on an existing care home which is in need of renovation to improve the provision of care home standards and therefore the new building has been carefully designed to offer economies of scale in bedroom provision while the structure will be located on an area of existing landscaping and hardstanding making efficient use of land, keeping the building footprint to a minimum and meeting the requirements of Paragraphs 119 and 124 of the NPPF by delivering an identified need.

Achieving well designed places

- 4.2.16. Paragraph 126 states the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.
- 4.2.17. Paragraph 130 ensures that developments will function well and add to the quality of the area; are visually attractive as a result of good architecture, layout and appropriate and effective landscaping; are sympathetic to local character and history, including the surrounding built environment and landscape setting; establish or maintain a strong sense of place; accommodate and sustain an appropriate amount and mix of development including greenspace and support local facilities and transport networks; and create places that are safe, inclusive and accessible and which promote health and wellbeing.
- 4.2.18. The building has been carefully designed to limit its impact on neighbouring dwellings and will add an attractive building to a conservation area. The enhancements to the existing care home to improve its appearance also assist in the proposal meeting the requirements of good architecture which is sympathetic to policy requirements thereby meeting provisions under Paragraph 130 of the NPPF. Further justification is included in the accompanying Heritage Statement.

Conserving and enhancing the historic environment

- 4.2.19. Paragraph 189 recognises that heritage assets range from sites and buildings of local historic value to those of the highest significance. These assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.
- 4.2.20. Paragraph 194 requires applicants to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. Where a site includes or has the potential to include heritage assets with archaeological interest, developers should submit an appropriate desk-based assessment and, where necessary, a field evaluation.
- 4.2.21. Paragraph 195 requires local planning authorities to identify and assess the particular significance of any heritage asset (or its setting) when considering the impact of a proposal to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.
- 4.2.22. Paragraph 197 requires account to be taken of the positive contribution that conservation of heritage assets can make to sustainable communities and the desirability of new development making a positive contribution to local character and distinctiveness.
- 4.2.23. Paragraph 199 states when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.
- 4.2.24. Paragraph 200 requires any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting) should require clear and convincing justification.

- 4.2.25. Paragraph 202 states where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.
- 4.2.26. Paragraph 206 encourages looking for opportunities for new development within the setting of heritage assets to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.
- 4.2.27. In line with Paragraph 205 of the NPPF, a heritage statement is included which includes an assessment of the surrounding heritage assets and makes a proportionate assessment to the assets' importance sufficient to understand the potential impact of the proposed on their significance in-line with Paragraph 194 of the NPPF. It finds that the proposal would cause not harm to nearby listed buildings or the conservation area, and cause less than substantial harm, classed as at the low end of 'less than substantial harm', to the non-designated heritage assets of Tetherdown Hall and its associated cottages. As set out in this report, this very low level of harm is more than outweighed by the public benefits of the proposal.

HARINGEY LOCAL PLAN (2017)

- 4.2.28. **Policy SP2: Housing** states that the Council will aim to provide homes to meet Haringey's housing needs including residential care homes.
- 4.2.29. **Policy SP4: Working Towards a Low Carbon Haringey** seeks to promote and require all new development to take measures to reduce energy use and carbon emissions during design, construction and occupation. All new non-residential development shall be built to a minimum BREEAM 'very good' level.
- 4.2.30. **Policy SP7: Transport** states that the Council will work with its partners to promote the following travel demand management schemes to tackle climate change, improve local place shaping and public realm, and environmental and transport quality and safety by: Minimising congestion and addressing the environmental impacts of travel; Promoting public transport, walking and cycling (including minimum cycle parking standards); and Seeking to locate major trip generating developments in locations with good access to public transport and so better integrate transport and land use planning.
- 4.2.31. **Policy SP11: Design** states that all new development should improve Haringey's built environment and create places and buildings that are high quality, attractive, sustainable, safe and easy to use. To achieve this, development is expected to be of a high design standard taking into account local context and character and historic significance. It is also expected to seek the highest standards of access in all buildings and places and ensure buildings are designed to be flexible and adaptable in order to integrate services and functions.
- 4.2.32. **Policy SP12: Conservation** of the Local Plan states the council will ensure the conservation of the historic significance of Haringey's heritage assets, their setting and the wider historic environment including Locally Listed Buildings, Statutory Listed Buildings and Conservation Areas.

HARINGEY DEVELOPMENT MANAGEMENT DEVELOPMENT PLAN DOCUMENT (2017)

- 4.2.33. **Policy DM1 ‘Delivering High Quality Design’** states that development proposals should relate positively to their locality, having regard to, building heights, form, scale and massing prevailing around the site, urban grain, sense of enclosure and, where appropriate following existing building lines, rhythm of any neighbouring or local regular plot and building widths and distinctive local architectural styles, detailing and materials.
- 4.2.34. **Policy DM2 ‘Accessible and Safe Environments’** states that proposals for new developments should ensure they are designed to be used safely, easily and with dignity by all having regards to the layout to improve access to social and community infrastructure.
- 4.2.35. **Policy DM 7: Development on infill, backland and garden land sites** states that the Council will support development on backland and garden land subject to it meeting Policies DM1 and DM2 firstly. They must also relate appropriately and sensitively to the surrounding area as well as the established street scene, ensuring good access and where possible, retaining existing through routes.
- 4.2.36. **Policy DM9: Management of the Historic Environment** states that Haringey will support development that conserves and enhances the significance of a heritage asset and its setting. A statement describing the significance of the heritage asset(s) concerned and any contribution made by its setting, along with an assessment and justification of the impact of the new development on the asset and its setting will be required with applications affecting the historic environment.
- 4.2.37. **Policy DM15: Specialist Housing** covers Haringey’s approach and policies in terms of special needs housing. It states that the council will support proposals for new special needs housing where it can be shown that there is an established local need for the form of special needs housing sought having regards also to the aims and recommendations of Haringey’s Housing Strategy and Older People Strategy.
- 4.2.38. The standard of housing and facilities should be made suitable for the intended occupiers in terms of:
- Provision of appropriate amenity space, parking and servicing;
 - The level of independence;
 - Level of supervision, management and care/support; and
 - There is a good level of accessibility to public transport, shops, services and community facilities appropriate to the needs of the intended occupiers;
- 4.2.39. The Council will seek to work proactively with providers of specialist accommodation for older people to identify and bring forward appropriate sites.
- 4.2.40. **Policy DM21 ‘Sustainable Design, Layout and Construction’** states that all new development will be expected to consider and implement sustainable design, layout and construction techniques including the application of the energy hierarchy to minimise energy use in order to reduce carbon dioxide.
- 4.2.41. **Policy DM31 ‘Sustainable Transport’ encourages the location of** developments with high trip generating characteristics to be in areas where public transport accessibility is high and car parking is minimised to mitigate generated car travel.

- 4.2.42. As identified in **Figure 4-1** (below) the plan identifies that the site lies inside the conservation area for Muswell Hill but has not been allocated for a specific use:

Figure 4-1 - Screengrab from Haringey's Local Plan 2016-2028



LONDON PLAN (2021)

- 4.2.43. Adopted London Plan (2021) relevant policies:

- Policy GG1 Building strong and inclusive communities
- Policy GG2 Making the best use of land
- Policy D1 London's Form and Characteristics
- Policy D5 Inclusive Design
- Policy D5 Accessible Housing
- Policy D10 Basement Development
- Policy H12 Supported and specialised accommodation
- Policy S2 Health and social care facilities.

- 4.2.44. **Policy S2 Health and social care facilities** states that development proposals that support the provision of high-quality new and enhanced health and social care facilities to meet identified need and new models of care will be supported. The proposal fully aligns with this policy and in addition aim to provide additional care facilities in the area.

- 4.2.45. The revised proposals accord with the above development plan policies, as evidenced through the submitted documents and technical case in the next section.

5 PLANNING CONSIDERATIONS

- 5.1.1. This section assesses the proposal in relation to the planning policy context in terms of the principle of development. It demonstrates why the proposal is acceptable and accords with relevant national and local policies, the key benefits associated with the scheme and why development of the site is needed now.
- 5.1.2. **PRINCIPLE OF DEVELOPMENT**
- 5.1.3. The proposal represents sustainable development in line with the definition set out at NPPF paragraph 119, as set out in more detail below.
- 5.1.4. The site is in a sustainable location for care home facilities. The principles of sustainable development underpin the proposal, which makes the best use of brownfield urban land and re-uses part of an existing car park. The proposal delivers positive improvements in the quality of built and historic environments, providing much needed care home provision and improvements.
- 5.1.5. It aligns with many of the key principles of the NPPF. The NPPF sets a presumption in favour of sustainable development which meets economic, social and environmental benefits (paragraph 8).
- 5.1.6. In terms of the care home (C2 use), the objective of both national and local policy is to ensure there is an appropriate supply of homes to meet the varied needs and incomes of the local population whilst respecting the local character and ensuring they are designed to minimise environmental impact on the social and environmental infrastructure.
- 5.1.7. This is also set out in the latest pre-application response (Appendix A) in which Haringey Council state:
- ‘The principle of additional care home provision in the borough is welcome, subject to clarification of detailed provision of care. Full residential care home rooms are preferable as in higher need.’*
- 5.1.8. Overall, the proposed development accords with the main thrust of the NPPF for development on brownfield land and development which delivers economic, social and environmental benefits.

5.2 DELIVERING A HIGH STANDARD OF DESIGN

- 5.2.1. In terms of design, the objective is to ensure new development is well designed, safe, energy efficient and complements the surroundings, respecting the existing scale and layout. Private and public open space, car parking are key considerations.
- 5.2.2. The Design and Access Statement (DAS) and accompanying plans have been prepared in light of careful consideration and response to the site’s context, heritage assets and the site’s opportunities and challenges.
- 5.2.3. The design vision for the proposed development is to create a high quality sustainable development that provides social, economic and environmental benefits for the proposed residents and community of Muswell Hill.
- 5.2.4. The site presents many opportunities as it is located in close proximity to nearby amenities. The challenges including heritage and access are addressed and justified through the proposed design.
- 5.2.5. The design embraces these challenges and turns them into opportunities to produce a high-quality architectural aesthetic that will sit harmoniously in the urban context. The design has been fully

considered with regards to use, amount, scale, layout, elevational treatment, appearance, accessibility, sustainability and materiality to ensure that the development benefits its immediate location.

- 5.2.6. The scheme has been considered throughout the evolution of the design process. The applicant has worked closely with the local planning authority to refine the design so that it best takes account of protecting and improving the character and quality of the area. It is acknowledged that the site sits in a sensitive location given the conservation area and nearby listed buildings, however the proposed development takes a sensitive approach to layout and form of the proposed new building which fully respects the setting of the conservation area and its assets.
- 5.2.7. Development Management DPD Policy DM1 **‘Delivering High Quality Design’** and **Local Plan Policy SP12 ‘Conservation’** expects all development to have regard to specific issues including high quality design in all new developments with additional emphasis placed on developments located within town centres. The design response to each of the policy requirements is set out in **Table 8-1** below.

Table 5-1 – Development response to Policy DM1 ‘Delivering High Quality Design’

Policy DM1 considerations	Development response
Relate positively to neighbouring structures, new or old, to create a harmonious whole; Make a positive contribution to a place, improving the character and quality of an area; Confidently address feedback from local consultation; Demonstrate how the quality of the development will be secured when it is built; and Are inclusive and incorporate sustainable design and construction principles.	Through design development, the layout, massing, site position and facade have been tested and refined so that the building reaches its potential and provides a high-quality addition to the area. Place making has been improved with improvements to active frontage and entrances in locations to enhance vitality and animation of the streets. The impact of the proposals on heritage has been fully assessed within the planning application. The technical assessments are supported by a Heritage Statement. The Heritage Statement demonstrates that the proposed development is in accordance with the requirements of the Historic England guidance Statement of Heritage Significance (2019) and Conservation Principles, Policies and Management for the Sustainable Management of the Historic Environment (2008). The scale and form of the building responds to the surrounding areas both with regard to height and massing. Site specific considerations have informed the design. The design development is set out within the Design and Access Statement prepared by RDT Architects.
Development proposals should relate positively to their locality, having regard to: Building heights;	The design and layout of the proposed building would introduce a form of building that would integrate into the site without appearing dominant or incongruous. By virtue of its

Form, scale & massing prevailing around the site; Urban grain, and the framework of routes and spaces connecting locally and more widely; Maintaining a sense of enclosure and, where appropriate, following existing building lines; Rhythm of any neighbouring or local regular plot and building widths; Active, lively frontages to the public realm; and distinctive local architectural styles, detailing and materials.	standalone nature and reduced height (compared to the refused scheme) it would not cause any overshadowing issues and would not appear overbearing. In terms of the residents to the west and south, the extension would be located a considerable distance from the rear boundaries of the dwellings with windows facing Spring Lane not habitable windows for privacy. The building respects urban grain and building lines, and bring surveillance to Spring Lane to better engage the street and create enclosure.
Development proposals shall demonstrate how the landscaping and planting are integrated into the development as a whole. The Council will expect development proposals to respond to: Landform; Levels, slopes and the fall of the ground; Trees on and close to the site; Landscaped boundary and treatments; and Any other significant biodiversity (including prioritising native over invasive species) on or close to the site.	The proposals include hard and soft landscaping and public realm across the site. The landscaping will assist in creating attractive landscaped areas at various points within the site and along its boundaries. The revised garden will be a much better and more usable space for residents.
Development proposals must ensure a high standard of privacy and amenity for the development's users and neighbours. The Council will support proposals that: Provide appropriate sunlight, daylight and open aspects (including private amenity space where required) to all parts of the development and adjacent buildings and land; Provide an appropriate amount of privacy to their residents and neighbouring properties to avoid overlooking and loss of privacy detrimental to the amenity of neighbouring residents and the residents of the development; and Address issues of vibration, noise, fumes, odour, light pollution and microclimatic conditions likely to arise from the use and activities of the development.	The proposal will provide appropriate levels of privacy and amenity for new residents whilst respecting the amenity of adjacent residents. It provides suitable separation. The new suites all will receive acceptable levels of day light and sunlight, and have easy access to outdoor space. The supporting reports demonstrate no adverse impact in daylight/sunlight for nearby properties. Likely levels of vehicle movements are not predicated to have a significant effect upon air quality or traffic generation. There will be no effects on biodiversity or landscape. The development complies with the inclusive design standards and therefore enables everybody to be able to enter the buildings, use its facilities and leave safely, independently and with ease. The development will also promote active travel and exercise by encouraging and prioritising walking and cycling through the provision of safe cycle parking.

the residual dust impacts arising from the construction phase are not considered to be significant provided mitigation measures are undertaken.

5.3 NEED FOR CARE HOME

- 5.3.1. Haringey is a large borough in London. Although dating from 2014, Haringey's Strategic Housing Market Assessment (SHMA) report stated that demand for housing and schemes that provide care will increase as the population ages, with POPPI data suggesting that there will be a 24% rise in the number of people requiring accommodation in a care home. Considering the projected increases to 2020 in the number of people with learning and physical disabilities and personal care disabilities, the report concluded that it is likely that the overall capacity of suitable stock will need to continue to grow in Haringey in order to meet needs.
- 5.3.2. The latest State of the Borough Report (2021) concludes that Haringey's population is expected to increase by 5% by 2030 with the largest percentage growth in older age groups (65+).
- 5.3.3. Haringey's draft Health and Wellbeing Strategy 2020-24 seeks to improve the wellbeing of older people in care homes, with new and enhanced accommodation key to this. whilst
- 5.3.4. Therefore, providing high quality care home facilities in this part of London to support the extant and future demands is imperative to meet the acute need for older persons' accommodation.
- 5.3.5. Further evidence on the demographic need for this type of accommodation is set out within the submitted Care Home Needs Assessment, undertaken by Pinders.
- 5.3.6. The study assesses the current and future demand for care services for the elderly, both within the specified catchment area surrounding the subject property and in the wider administrative area.
- 5.3.7. The report relies on a number of datasets including sub-national population projections, a series of Market Surveys and studies, academic research and data, database of planning application and information available from the Elderly Accommodation Counsel (EAC).
- 5.3.8. The study concludes that 7% of those aged 65 year or more are likely to be unable to perform two or more core Activities of Daily Living and thereby qualify for care in accordance with the national eligibility criteria. Applying this estimate to the current population within the Catchment Area indicates that some 5,596 older people are likely to have the higher care needs which would require some form of residential care or intensive assistance within their own dwelling. The number of older people requiring care is forecast to increase to 7,367 within the next 10 years.
- 5.3.9. The report examines the existing provision of both residential-care establishments and extra-care housing and estimates the mix of accommodation which will be required to meet the population's future care needs.
- 5.3.10. In view of the ageing population, the requirement for purpose-built care homes will increase in the coming years. The report concludes that there is a shortfall in provision of 3,082 units of accommodation. Taking into account the forecast increase in demand and approved planning application in the pipeline, which suggest a potential additional 82 care home bed spaces, the shortfall is predicted to increase over the next decade to 4,771.

- 5.3.11. In terms of supply and demand of care facilities, the demographic analysis demonstrates that there is empirical evidence to support the need for a new care home bed spaces within Haringey, particularly ones that are modern and conforming to modern standards.
- 5.3.12. The development will therefore relieve some of the existing pressure. Care homes that are able to increase their provision and quality will be important to the future care in the Borough.
- 5.3.13. Paragraph 4.13.14 of the London Plan states that the London Plan acknowledges that care home accommodation (C2) is an important element of the suite of accommodation options for older Londoners. It states that to meet the predicted increase in demand for care home beds to 2029, there will be a required provision of an average of 867 care home beds a year.
- 5.3.14. Land availability is also an issue. Existing sites and premises providing an element of care are a finite resource and may be threatened by higher value uses. This illustrates a struggle that care home providers face when looking for suitable sites.
- 5.3.15. The National Planning Policy Framework (NPPF) encourages planning authorities to “plan for a mix of housing based on current and future demographic trends” and to consider a range of specialist housing, including for older people, in local housing market assessments. The proposals therefore align with an identified need for care homes and are therefore compliant with policies S2 of the London Plan and Policy DM15 of the Haringey Development Management DPD.
- 5.3.16. In light of the above policy context, the principle of specialist accommodation (such as care homes) in urban locations such as Muswell Hill should be supported subject to other material planning consideration such as design, scale and layout. This is confirmed in the latest pre application response which states:

5.4 HERITAGE

- 5.4.1. A Heritage Statement is included with the application. The report concludes that the proposed development does not cause any harm to nearby listed buildings or the character and appearance of the conservation area. It does cause less than substantial harm to the non-designated heritage assets of Tetherdown Hall and its cottages, however this is classed at the lower end of less than substantial harm. The limited harm is more than outweighed by the public benefits of the proposal, and the benefit to the conservation area from enhancements to the original care home facades and its front garden area. The proposal therefore accords with Local Plan Policy SP12 and Policy DM9 of the Development Management DPD Plan which supports protecting and enhancing heritage assets and its setting.
- 5.4.2. The proposed development with respect to improvements to the existing care home has a positive impact on the conservation area and its setting. The new building does not affect the conservation area. It causes less than substantial harm, at the lower end of less than substantial, to the non-designated heritage assets of Tetherdown Hall and cottages.
- 5.4.3. In accordance with Policy DM9, the development makes a positive contribution to the protection and enhancement of the Borough’s heritage assets. The proposal is of an appropriate scale, form, height, massing, alignment and detailed design which will contribute to local distinctiveness, complement the built form and scale of heritage assets and respect the character, appearance and setting of the locality.

- 5.4.4. In line with NPPF paragraph 202, the Heritage Statement and this Planning Statement have identified the significant public benefits arising from the proposal (see below for a full summary of the significant economic, social and environmental benefits). When weighed against the limited harm identified within the Heritage Statement, these benefits weigh substantially in favour of granting planning permission.

5.5 BENEFITS

- 5.5.1. The development will deliver significant environmental, social and economic benefits. The benefits associated with this application should be considered as part of the heritage public benefits test, and also the overall planning balance and the heritage case.

ECONOMIC BENEFITS

- 5.5.2. Temporary economic benefits will be provided:

- Construction of the new building and refurbishment of the care home will create both direct and indirect construction jobs over the construction period;
- Generation of gross value added to the local economy by the temporary construction employment;

- 5.5.3. Permanent economic benefits will include:

- Creation of full and part time jobs to service the new building and its residents;
- Indirect employment opportunities from the additional care home units.

SOCIAL BENEFITS

- 5.5.4. Social benefits including:

- Provision of much needed and justified additional care units to meet the needs of local residents, allowing them to remain close to friends and family in their community;
- Provision of improved care accommodation for residents;
- Provision of improved outdoor and amenity space for residents, improving health and well-being.

ENVIRONMENTAL BENEFITS

- 5.5.5. Environmental benefits including:

- Reuse of previously development land, this directly assisting in delivering sustainable development as outlined in national and local policy;
- Provision of a high quality design, which will improve the appearance of the built environment enhancing the relationship to neighbouring developments;
- Environmental benefits will be delivered through the implementation of an energy strategy that will underpin an energy efficient development which will also target a BREEAM 'very good' standard. The provision of photovoltaic panels (PV) for renewable energy generation for future residents to help HBC continue to meet its ambitions towards being carbon neutral by 2041.
- Accessibility and transport benefits through locating development in a sustainable urban location close to public transport.
- Minimising car parking provision within the scheme (to 2 parking spaces) and encouraging active travel modes through incorporating cycle parking spaces

- Ecological benefits arising from additional landscaping in the form of native ornamental grasses and hedges will be introduced creating a landscaped ecological mitigation area to generate year-round biodiversity benefits.
- The additional soft landscaping and the green infrastructure proposals woven throughout the design represents a visual and biodiversity benefit that would contribute towards the Borough's green infrastructure network. It will also contribute towards improving the physical and mental wellbeing for existing care home residents.

5.6 SUMMARY

- 5.6.1. This chapter demonstrates that the proposed development will provide substantial economic, social and environmental benefits to the area in accordance with paragraph 8 of NPPF and plan policy.
- 5.6.2. The proposed development will contribute vastly to the strategic ambitions of HBC by aligning with the pro-economic growth and regeneration policies of the NPPF and the Development Plans by delivering a much needed care home development.
- 5.6.3. The many public benefits outweigh the identified low level of less than substantial harm to the non-designated heritage assets in line with the NPPF test as paragraph 199.
- 5.6.4. Overall, the proposed development will have a substantial and positive impact upon the local economy, social wellbeing and the environment. It follows that the proposed development constitutes sustainable development and therefore accords with paragraph 8 of the NPPF.
- 5.6.5. These benefits are significant material considerations which weigh heavily in favour of the proposed development and justify the grant of planning permission.

6 MATERIAL CONSIDERATIONS

6.1 DAYLIGHT AND SUNLIGHT STUDY

- 6.1.1. A Daylight and Sunlight Study is included as part of this planning application. The design of the proposed development has been informed by detailed sunlight and daylight analysis and modelling to ensure that neighbouring properties, including 8-10 Fireman Cottages, Jubilee Court and “Tetherdown” would receive sufficient sunlight and daylight once the new building is operational.
- 6.1.2. Numerical analysis has been utilised to calculate the recommended levels of change in daylight for the window receptors identified within the study.
- 6.1.3. The results demonstrate that the effect on window receptors meet the minimum requirements as set out by BRE Guidelines and may only experience negligible adverse impact in terms of daylight and sunlight.
- 6.1.4. In summary, the design would result in a proposal avoiding harm to neighbouring living conditions/accommodation. The proposal satisfies relevant planning policies in this regard.

6.2 DESIGN AND SUSTAINABILITY

- 6.2.1. The NPPF also provides guidance to ensure that the design of new development incorporates the principles of sustainable development and the need to create better places in which to live and work. Paragraph 130 sets out several design criteria with the purpose being to ensure that design is of a high quality and appropriate for the area in which the development is located.
- 6.2.2. The proposed development has been designed in accordance with the above guidance:
- The layout, scale and appearance of the proposals have been developed to create a high quality and attractive scheme with integrates well with the wider townscape;
 - The elevational treatment has been carefully considered in the context of the site’s current setting in order to create a contemporary and attractive appearance;
 - The development includes soft landscaping and planting which seeks to enhance the site’s boundaries;
 - The development has been designed to respect and protect neighbouring residential amenity including the neighbours’ amenity, identity and character of the area;
 - The proposal provides easy access for future users who wish to arrive to by bicycle. The proposal itself includes cycle parking provision; and
 - The development is accessible to all with disabled parking bays provided.
- 6.2.3. As such, the design of the proposed development is in full accordance with Local Plan policy SP11 as well as paragraph 130 of the NPPF.

6.3 ENERGY AND SUSTAINABILITY

- 6.3.1. An energy, sustainability and overheating statement has been prepared by Harniss and is enclosed as part of this application. The studies also include a preliminary BREEAM assessment with the aim of interventions throughout the construction phase and finished development scoring up to a ‘very good’ standard.

- 6.3.2. The statements have conducted an appraisal of the renewable and low carbon technology energy options to be employed at the site once operational in order to align with the requirements set out under paragraph 157 of the NPPF with regards to reducing energy consumption during the lifetime of the development.
- 6.3.3. The statement concludes that a number of measures are proposed which can have significant impacts in CO2 reduction such as electric panel heaters as part of the base build and solar mounted PV installation on the roof of the development.
- 6.3.4. The proposals can therefore be considered to be in full accordance with policy DM21 of the Local Plan.

6.4 HERITAGE

- 6.4.1. A heritage statement is enclosed with this application and has considered the significance of the heritage assets located near to the application site, including the Muswell Hill Conservation Area and assessed the impact the proposed development would have on the significance of those heritage assets.
- 6.4.2. The report concludes that the proposed location, scale, massing, and materials of the proposed development are appropriate to the context and would not cause any harm to nearby listed buildings (Grade II listed The Gables) or the conservation area. It would cause less than substantial harm to the significance of the non-designated heritage assets of Tetherdown Hall and cottages, however this is classed at the low end of less than substantial harm
- 6.4.3. The proposed enhancement works to the existing building would make a positive contribution to the conservation area as they would enhance a building classed as a detractor to the character, altering the facades to make the building more in keeping with the architectural style in the immediate surroundings of the site. The alterations would remove the negative contribution the existing building has on the character and appearance of the conservation area.
- 6.4.4. In considering any harm, along with relatively limited significance of the non-designated building and the wider public benefits of the scheme, the proposal should be considered favourably in line with Paragraph 202 of the NPPF. The proposal is considered to preserve the character and appearance of the conservation area and satisfies policies SP12 of the Haringey Local Plan and DM9 of the DPD Plan.

6.5 LANDSCAPING

- 6.5.1. A comprehensive landscaping strategy has been prepared and forms part of the application. The strategy demonstrates how the scheme can retain and enhance existing natural assets where possible, provide ecological benefits, enhanced recreational opportunities and enhanced planting opportunities.
- 6.5.2. The landscaping has been carefully considered and integrated within the layout to ensure the protection of the amenity of the area for future occupants in terms of daylight, sunlight, privacy and soft landscaping.
- 6.5.3. The proposal seeks to deliver a high quality of hard and soft landscaped areas throughout the Development. This will provide modern space where residents can socialise.
- 6.5.4. A further landscape area will be provided opposite the building entrance fronting onto Spring Lane.

- 6.5.5. The landscaping proposals include extensive soft landscaping improvements to the green/amenity area within the grounds of the care home including the planting of two ornamental trees, hedges, shrubs, wildflower, and raised planters including a water feature.
- 6.5.6. In terms of hard landscaping, the layout will include paved areas timber gazebos, seating in the form of benches and dining sets.
- 6.5.7. An Urban Greening Factor Site Assessment is also included with the application. The assessment concludes that the baseline is 84.9m² and the current proposals will lead to a significant improvement of 146.1m² with a total green space coverage of 231m².
- 6.5.8. The landscaped areas will provide significant environmental benefits and boost the overall biodiversity of the local area. As a result of the above, the proposal delivers significant enhancements in terms of landscaping and therefore accords with policies.
- 6.5.9. The proposal therefore accords with Strategic Local Plan Policy SP11 and Policies DM1 & DM21 of the DPD Plan.

6.6 TRANSPORT

- 6.6.1. A Transport Statement has been carried out and prepared by EAS and is enclosed with this application.
- 6.6.2. The site is well served by local facilities and public transport services with important local amenities and services available within a 5 to 10-minute walk from the site.
- 6.6.3. The site is deemed to receive a PTAL score of 3. Deliveries and servicing will occur via the site's car park, while larger delivery vehicles will either park or unload on Spring Lane or Fortis Green, transferring the goods to site using a trolley.
- 6.6.4. Bins are presented to the kerbside on Spring Lane by site staff, with a refuse vehicle, attending site twice per week. This can be justified as a parking survey carried out on a Saturday, reasoned as being the busiest day of the week in terms of parking demand at the site, recorded a peak of ten vehicles in the car park.
- 6.6.5. Peak occupation of the car park during the survey was 2 vehicles, which equates to 0.032 spaces per room for the current 62 rooms. With the proposed increase to 68 bedrooms this would equate to 2.18 vehicles ($68 \times 0.032 = 2.176$): being robust and rounding this up to 3, the highest number of vehicles likely to be in the site car park concurrently.
- 6.6.6. There would thus still likely be 9 spaces available, even at the busiest times of the week, which again would be accommodated within the proposed car park.
- 6.6.7. The car park will have space for 12 vehicles, inclusive of the minibus/disabled space. It is therefore expected that at the busiest time on the busiest day of the week there would be a surplus of parking spaces, despite the increase in the number of rooms.
- 6.6.8. In light of the above, the development would not result in severe impacts on the capacity or safe functioning of the highway as a result of the development and that the requirements of DM31 of the Local DPD Plan and Paragraph 111 of the Framework would be met in full.

7 CONCLUSION

- 7.1.1. The proposal is for a three storey 6-bedroom assisted care building with improvements to the garden and parking, and associated comprehensive façade improvements and changes to the existing care home (including removal of awning, sensitively designed entrance, replacement of windows, improvement to fenestration proportions, boundary improvements and addition of appropriate architectural detailing).

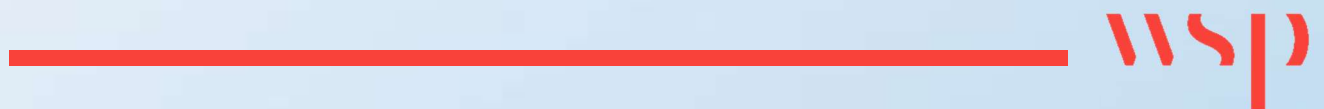
SCHEME BENEFITS

- 7.1.2. The proposal comprises sustainable development and accords with national and local planning policy. The NPPF is focused on reusing brownfield land such as the subject site and supporting sustainable development. Therefore, the proposals would represent a significant community and social benefit.
- 7.1.3. We have demonstrated that there is a clear need for additional care/specialist accommodation within Haringey due to the ageing population and shortage of supply. The proposal would help to address some of the supply issues by providing 6 new bedrooms in a modern purpose-built care home. The proposal would provide significant community benefit to the area in terms of care and employment opportunities.
- 7.1.4. The need for care provision has been consistently accepted by the council, however the proposal by now seeking a standalone smaller building on site has addressed all previous design and heritage concerns.
- 7.1.5. The design has resulted in a decrease in scale, height and massing when compared to the previous schemes, as well as proposing a new architectural approach complementing the architectural style, scale, proportions, materials and details of the surrounding area.
- 7.1.6. These changes take design cues from the character and appearance of the conservation area and offers public benefit in facilitating an improved appearance to the existing building, which will enhance the character and appearance of the conservation area and remove the negative contribution the existing building has on its character.
- 7.1.7. The proposal takes a fresh approach to design and materials to produce a high-quality standalone building that complements the architectural style, scale, proportions, materials and details of the area and enhances the host building.
- 7.1.8. Any limited less than substantial heritage harm is more than outweighed by the public benefits of providing much needed care accommodation, enhancing the care provision and facilities for existing residents, and providing additional jobs and investment in the local economy.
- 7.1.9. This allied to the improvements proposed to the building frontage with additional landscaping will enhance its contribution to the character of the conservation area in a location opposite listed buildings.
- 7.1.10. The extensive technical assessments demonstrate that the proposed development will not give rise to any significant adverse impacts on the area or amenity of nearby neighbours. Impacts can be successfully mitigated. The development therefore constitutes sustainable development and raises no material considerations which would outweigh its accordance with the Development Plan when taken as a whole.

- 7.1.11. Taking into consideration the points raised within this statement, it is respectfully requested that the Council positively consider this application and grant planning permission.

Appendix A

PRE-APP RESPONSE FROM HARINGEY COUNCIL





Pre-Application Planning Advice Note

Ref: PRE/2022/0292

Date of meeting: 23/1/2023

Thank you for attending the recent Pre-Application Planning advice meeting with Haringey Council to discuss your proposal. We hope you found the meeting useful. The points discussed at the meeting are outlined below, along with feedback from the Planning Service about aspects that were good, could be improved, or are unlikely to obtain planning permission as currently proposed. We hope this summary will provide you with useful guidance about the steps you will need to take before submitting a application for planning permission.

If you have any questions about the feedback we have provided, please contact the named officer who will be able to clarify the advice. If you require further advice, our website can provide you with some information about the things we take into consideration when determining a planning application, or you can book a second pre-application advice meeting.

Site Address: Spring Lane Care Home, 170 Fortis Green, London N10 3PA

Proposal: Three-storey rear extension and amendments to existing basement with additional care home bedrooms, amenity space, activity lounges, therapy room and pool, landscaping, new garden and associated staff facilities

Submitted Documents: Design and access statemt, External Daylight Study, Heritage Statement, Care needs Assessment, Site Locaion Plan.

Attendees:

Tania Skelli (Deputy Team Leader), Elisabetta Tonazzi (Principal Conservation Officer).
Alistair Howden (Ashden), Theodore Powell (Springdene Nursing and Carehomes Ltd), Arnold Powell (Springdene Nursing and Carehomes Ltd), Doug Hann (WSP), Nick Corbett (Heritage/ WSP) and Mateo Espinosa (Planner/ WSP), Cheten Chauhan (RDT).

Summary of Council's response

Overall RAG Rating	Reason for rating
	The principle of additional care home provision in the borough is welcome, subject to clarification of detailed provision of care. Full residential care home rooms are preferable as in higher need. subject to the details of use and functionally, several design related recommendation are included below, under '3 rd pre-app advice' sections. Further pre-application advice is recommended to be sought prior to a full application submitted.

Review of submitted proposal

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

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

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

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

NOTE: The rating assigned is a result of the officer's consideration of the proposal against the current planning policy (see below) and all other material planning considerations insofar as they are known at this stage (i.e before consultation with the neighbours has taken place).

Policy aspect				Comments
Land use and principle of development		✓		The care home provider operates 160 care/nursing beds across north London including the subject site which includes 62 beds with en-suite bathrooms of 16-18sqm each. The care home has re-opened in 2006 after a major refurbishment. The majority of the surrounding buildings are in residential use with a nursery to the east of the site at ground floor level of a residential building. The principle of providing additional care home accommodation within the borough and in this area is acceptable in planning terms, subject to design and other considerations below.

Development Management, Placemaking and Housing,
5th Floor, Alexandra House, 10 Station Road, Wood Green, London N22 7TR

preapp@haringey.gov.uk

www.haringey.gov.uk

				Following the above pre-application advice a full application (ref. HGY/2019/0112) was submitted for a new rear 4 storey extension and rear single storey extension to provide 14 new residential care home bedrooms and additional communal space. Amendment to garden area and loss of 2 visitor carparking spaces. This application was refused and dismissed on appeal (ref. APP/Y5420/W/20/3264201) on 25/6/2021. A recent consent (HGY/2022/2494) granted the repositioning of the front entrance, installation of a new canopy, low wall and ramp, and alterations to side entrance on Spring Lane. 62 rooms existing. 6 new rooms are proposed. The new building is closely adjoining the host building, with an alleyway between the two buildings, leading to a rear landscaped garden and the retention of part existing parking to the north of the site. The provision of the additional care facility would be for the private market. It is understood that the proposed provision is for 'extra care' accommodation or 'supported living'. However, from a Council need perspective, the latter is market saturated (30% vacancy in the market of extra care provision) and the real need is in full residential care accommodation. A Care Needs Assessment is submitted as part of the proposal. This has been assessed with comments provided below. The proposal includes improvements to the existing/ host building, to the front of the site. If the new building can be supported by the Council, it would like to see both proposals submitted and implemented together. A mechanism for the overall joint delivery does not form part of this submission and would be expected under a new submission. Comments on new provision: - There doesn't appear to be any staff facilities within the building (Extra Care facilities
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				generally have staff on site 24/7). The Council would be interested to know what the proposed method of surveillance is proposing i.e.; pendant alarm, Assistive Technology and or CCTV. If staff from the existing residential care home are covering the personal care and support needs of residents how are they accessing the building? - The proposed flat layout suggests permanent residential homes. If the intention is for the tenants to be provided with catering services (e.g. a hot meal a day) how will this be delivered? i.e.; are you proposing to take hot meals over from home to the Extra Care (which may increase likelihood of future request for covered link between the two buildings, as discussed at our meeting). - The proposed building does not include provisions for ancillary spaces in the building such as cleaning cupboards etc. If the accommodation will include the offer of cleaning services through the private care market then it is unclear where providers are planning on taking cleaning supplies, trolleys, hoovers, linen etc. from one building to the other (may increase requirement for covered link) - The quality of information in the submitted Care Need Statement is appreciated, however, it does not apply the latest census data. The Planning Statement does not clearly define how the building is proposed to be used as it refers to both residential care and extra care and also refers to 6 bedrooms not flats. To summarise: - Full detailed floor plans are required to address and clarify the above points - Security details - Ancillary services details - The latest census data is encouraged - Extra Care facilities are generally independent flats but the submitted floor plate shows a flat without ancillary spaces. Please provide a more comprehensive description of the proposed service how it will be serviced and how residents would be supported - A statement setting out how both schemes would be delivered jointly
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Design and conservation issues		✓	Policy DM1 (Delivering high quality design) requires all new developments to achieve high standard of design and contribute to the character of the local area. Development in conservation areas should preserve the character or appearance of the area and forthcoming planning application will be assessed according to the NPPF, the London Plan and Haringey Development Plan policies SP11, SP12 and DM9 would apply. The site is located within the Muswell Hill Conservation Area. The adjoining Tetherdown Hall and its structures to the rear are locally listed on Haringey's' Local List. The site lies on the north side of Fortis Green and is surrounded by a mix of building heights and style. The majority of the surrounding buildings are in residential use with a nursery to the east of the site at ground floor level of a five-storey residential building. To the rear are two to three-storey high residential buildings and to its west a mansion block of four storeys and the low-level rear buildings of Tetherdown Hall. The rear of the site includes a large car park which provides a break between the buildings, some of which are clustered relatively closely to each other. A roof extension has been erected to the roof of the subject building, fronting Fortis Green. The application site is located within the Muswell Hill Conservation Area, a notably intact example of an Edwardian suburban development, created between the mid-1890s and the start of the First World War. The cohesive nature of the area derives partly from the relatively short period of construction, during which the development was carried out. This arrangement ensured not only a generally high standard of materials and construction but also a consistent architectural approach. Development along Fortis Green and the south side of Fortis Green Road is made up of substantial three and four storeys blocks of flats occupying large plots. There are a variety of materials, the most common of which is red brick, although yellow brick and render are also used. The majority of the roofs are covered in red clay tiles. Architectural styles show predominantly Arts and Crafts and Neo-Georgian influences, with prominent chimneys,
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				many of which are expressed at the ends of blocks, windows subdivided into small panes and mansard roof forms. The development site is in the vicinity of a number of statutory and locally listed buildings, including The Gables (nos. 1 to 18 Fortis Green), a Grade II listed block of flats to the south of the development site, built in 1907 in a style inspired by Arts and Crafts and Jugendstil influences. The Gables is three storeys high, constructed of red brick and has a symmetrical elevation. Also opposite the development site, to the south, is the locally listed Fairport Health Centre. It was designed with Arts and Crafts influence and is two storeys with an attic in a steeply sloping half-hipped and gabled tiled roof and has three prominent tall red brick chimney stacks. To the rear of the development site, to the north-east, stands a complex of locally listed buildings, including the Tetherdown Hall, dating to 1928, a simple, well-detailed neo-Jacobean composition in red brick with stone dressings. The 'Cottage', to the rear of Tetherdown Hall, is a series of c1930 garages, built in red-brick, laid out as a traditional stable yard, with a central two-storey block topped by a cupola and original timber doors - an unusually complete survival in the area. In contrast to the high-quality architecture and materials of its surroundings, the development site at No. 170 Fortis Green includes a five-storey undistinguished and over-scaled block of retirement homes ('Spring Lane Care Home'), built in 1969 as Charles Clore House, on the site of St James's School. The building was built in red brick with a flat roof, originally four storeys high, with the top floor added at a later time. There is a four-storey projecting bay and a ground floor projection, incorporating large windows and a variety of materials. The mass, bulk and poor design of the Spring Lane Care Home, further accentuated by later inappropriate additions, detracts from the character and appearance of the conservation area. The development site sits within a very-well preserved heritage context and any new
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				development should enhance and better reveal the significance of the conservation area and the elements that contribute to that significance. Comments on new provision: Host building facade improvement - The proposed façade improvements to the existing building throughout the front and side elevations are welcome and are intended as a mitigation effort to better respond to the design and character of the historic street frontage along Fortis Green. Further discussion on detailing and materials is strongly advised. - The entrance canopy to front elevation still appears quite stark and further design exploration on the front elevation of the existing care home would be welcome to help reinforcing the residential character of the building. New building - The siting, scale and height of the proposed new building may be acceptable depending on further information about its spatial and architectural relationship with the main building and existing houses, which is currently unclear, with the design of the proposed building appearing divorced from the improved facade design of the care home and the prevailing design of the surrounding, small scale residential buildings. Further discussion on the merits of the architectural composition and detailed design of the proposed building is strongly advised. - The architectural relationship between new building, care home and houses along Spring Lane should be demonstrated through detailed contextual elevations and sections along Spring Lane. - The lack of a built link between the proposed new extension and the existing care home appears quite odd and make the proposed building look quite disconnected from the host building, this element of the proposal should be further considered and developed. - If a link is not carried further into the development of this proposal, then it may be that it might look more appropriate for this additional building to have a greater
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				separation, a wider gap, to the existing care home; - The proposed development offers an opportunity to improve the street frontage along Spring Lane and soften the boundary treatment by means of a contextually designed extension to the existing care home and by means of a well-integrated landscape design to complement the frontage and rear garden of the new building. - The proposed development should be assessed in angled views across the Conservation Area from the houses located in Spring Lane towards Tetherdown Hall and in views of the development site form the junction with Fortis Green and along both directions of Spring Lane - The new building has several flaws in key design details, in particular it is regrettable that there are no windows below eye level in the two flank elevations, meaning the alleyway between the new building and existing and the car park to its north will lack passive surveillance. A single, small, clear-glazed, below-eye-level window in each floor on each side; preferably to a kitchen or internal circulation, would provide passive surveillance and improve these rather featureless, blank elevations, especially the one to the car park which will be more visible; - In these respects, the alternative, Option 2, which puts this new building on the front part of their existing car park, much closer to the northern wall, is preferable; - The external, cosmetic alterations to the existing care home would “Georgian-ify” this 1960s/70s building, with pseudo-Georgian details, particularly windows. This cannot be supported on design grounds; - In particular, the windows’ proportions are unlikely to be convincing and do not look quite right in all cases for the carefully proportioned windows of authentic Georgian neo-Classical architecture, or its fairly authentic imitators, and the detailing of the proposed windows shown, with glazing bars that are too thick and frames set too shallow (should be a minimum of half a brick, i.e. 112.5mm); - The “tacked-on” imitation-stone bands and Juliette balconies also look unconvincing and are liable to become unsightly if they are not durable and well-embedded into the structure, as <i>appliqué</i> features often are; - It is also inconsistent, with a new entrance canopy proposed to be in grey metal, of a modern design;
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				- It is also ambiguous, with the northern-most part of the existing side wing, probably the most recent previous extension, being shown only in white. In addition, further details are encouraged to be submitted with regards to replacement signage to the existing building.
Impact on neighbouring amenity		✓		The London Plan (2021) Policy D4 states that development must not cause unacceptable harm to the amenity of surrounding land and buildings. Haringey's Development Management Development Plan Document (July 2017) Policies DM1 requires that development proposals must ensure a high standard of privacy and amenity for the development's users and neighbours. Given the site constraints concerns are raised over a sense of enclosure to occupiers in lower buildings surrounding the site, in particular to the north and west. Further assessment need to be carried out with regards to the use of the rear building of Tetherdown Hall and how they would be affected. Pls see comments with regards to the replacement amenity space above. A daylight and sunlight assessment may be required, subject to the scale of any future proposals. <i>Comments on new provision:</i> No further comments are proposed, subject to garden functionality to new building, improvements to front building, secure-by-design measures and daylight and sunlight assessment submissions.

Transportation issues				<i>Comments on new provision:</i> This proposal is part of wider plans for the refurbishment of the care home, which comprises internal improvements to accommodation and a new entrance. Façade changes are also proposed to the main care home to improve the appearance. This application is for the erection of a new standalone building to the immediate north of the existing building at the site, to accommodate 6 new bedrooms at the care home. Associated with this, there will be a reduction in car parking at the site from 17 spaces to 12, and the provision of cycle parking spaces, however different numbers are referenced within the submitted documents. It is also commented in the planning statement that a number of existing rooms are being refurbished, which will overall reduce the number of existing rooms as space is required to fully provide ensuite facilities to all rooms. However, another section in the planning statement references 6 new bedrooms and an overall uplift of 9 rooms to 71. This does need to be clarified. It is understood that there are 62 rooms in active use at present at the home so this will increase provision to 68 or 71 in total. It is also understood that there are 92 staff based at the home, with a maximum of 25 to 30 on site any the busiest times, it is commented that there will be only a very minor increase by one or two staff should the additional rooms be provided. <u>Location and access</u> This site is located to the north side of Fortis Green, and has a vehicle access off the eastern side of Spring Lane. It has a PTAL value of 3, considered 'moderate' access to public transport services. 7 different bus services are accessible within 1 to 8 minutes walk of the site.
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				The site is also within the Fortis Green CPZ, located right at the eastern boundary of the zone, which is in place from 11.00 to 13.00 Monday to Friday. St. Luke's CPZ is located immediately to the south of the site. This CPZ is in operation from 11.00 to 13.00 Monday to Friday. Muswell Hill West CPZ is located to the east of this site, and is in place from 10.00 to 14.00 Monday to Friday. Tetherdown located close by to the east of the site is not included in any of these CPZ's. <u>Considerations</u> A Transportation assessment accompanies the pre application proposal, which is the one that accompanied the planning application and is dated September 2021. This will need to be updated/refreshed as appropriate for any future application. The uplift of rooms to a total of either 68 or 71 from the licenced number of 68 (actual rooms in use equals 62) will create only a very slight uplift in visitor trips and additional staff trips and there are no capacity or network implications for the highway and public transport services from this. It is also detailed that refuse and recycling trips and delivery and servicing trips are not expected to increase. <u>Car parking</u> With respect to parking, the applicant's TA has included details of a parking stress survey, undertaken on a Saturday during autumn 2019, as that is generally the busiest day for visitors. There are no fixed visiting times. For any forthcoming application there should be a new parking stress survey carried out given the survey will be getting on for three years old. The survey recorded use of the existing 16 space car park, and this was approximately only just over half utilised during the survey day. There were always a minimum of 7 spaces recorded as available out of the 16. The TA accompanying the pre application references additional staff parking demands raising potential car parking demands by one or two vehicles maximum. Given the above the proposal to reduce overall vehicle parking to 12 spaces, it would appear
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				based on the 2019 parking survey that this would not result in any additional on street parking demands being generated. The proposed layout is referred to including two blue badge bays and electric vehicle charging bays as appropriate. Whilst two blue badge bays are referred to it does appear only one is shown on the drawings submitted. The parking stresses recorded on local streets were recorded at between 88 and 91%, so high levels of parking stress with little spare capacity. This survey was carried out before the most recent CPZ boundary changes so again, a new parking stress survey is appropriate. There is an ambulance bay marked up on Spring Lane that will facilitate any ambulance drop offs/pick ups as existing arrangements, <u>Cycle parking</u> There is no cycle parking at the site at present, and the TA proposes provision of 6 long stay and 4 short stay spaces. The Design and access statement shows 8 spaces located externally within the site in between the two buildings. The London Plan requirement is for one long stay space per 5 members of staff, so 6 spaces would meet the standard based on a maximum of 30 staff on the site at any given time. With respect to the short stay cycle parking, the London Plan requires 1 space per 20 bedrooms, hence 4 visitor spaces are needed. Any future application will need to show both long stay and short stay cycle parking. The 6 long stay cycle parking spaces need to be weatherproof and sufficiently secure, within a lockable storage container or similar.
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				Full details of the proposed arrangements for the cycle parking are required, and the proposed arrangements should be designed in accordance with chapter 8 of the London Cycle Design Guidelines produced by TfL. Detailed, dimensioned drawings including the manufacturer's installation specifications will be required. These details should accompany any future full application. <u>Refuse and recycling collection arrangements</u> It is understood that bins are located within the car park for collection from Spring Lane, and that there are two Haringey collections a week, and two clinical waste collections by PHS. With the uplift proposed it is detailed that there be no additional collection trips required so therefore arrangements will remain as existing. It is commented that the collection vehicles reverse into Spring Lane from Fortis Green to make collections. <u>Delivery and servicing arrangements</u> It is commented in the TA that small delivery vehicles such as vans are able to park and dwell within the car park at the rear of the site, however larger vehicles do need to park within Spring Lane. This will essentially remain as existing, the uplift in trips is expected to be minor. There are 19 trips a week at present. <u>Travel Plan</u> It is detailed that there are 92 members of staff at present in total, there will be a small uplift of say two persons, and that at any one time there will be 25 to 30 plus staff at the site. The travel modes used by staff to travel to the site have been provided, and recorded that the car mode was 29%. The walking and cycling mode shares were 5% and 2%. It is considered appropriate that a staff travel plan be implemented should this application eventually be granted consent, prepared in accordance with TfL guidelines. The implementation of a travel plan should seek to reduce the car mode from 29% and also seek to increase the walking and cycling mode shares. The provision of the travel plan and cycle parking at the site should be successful in reducing these. A detailed draft of the travel plan
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				can be covered by condition and there will be a travel plan monitoring fee required (amount to be advised). <u>Construction Phase</u> The construction work associated with this development would need to take place whilst the care home remained open. This would likely necessitate taking the car park out of use. Given the potential impacts on the ongoing use of the care home, and adjacent neighbours, it is appropriate that a Construction Logistics Plan or Construction Method Statement be provided for review and approval, this should detail how the development will be built out, and how potential impacts on the public highway and adjacent neighbours will be managed and mitigated. This document should accompany any future application. The CLP/CMS will need to include the programme duration, numbers of construction vehicles visiting the site, slot booking arrangements for deliveries and collections, and avoidance of movements in the AM and PM peaks. Any temporary arrangements envisaged for the public highway to facilitate loading or any other activity will need to be discussed with Haringey's Network Managers, and the outcomes of those discussions included in the document. <u>Summary</u> This application seeks to enlarge the existing Spring Lane care home from 62 to 68/71 rooms in total, (the correct number needs to be confirmed) with the construction of a new block to the immediate north of the existing building. There will be only a very minor associated uplift in staff, and it is expected a proportionate minor increase in visitors. Overall, the increases in transportation demand are expected to be relatively minor. Delivery and servicing and refuse/recycling collection arrangements are expected to remain as existing. Cycle parking will be provided however the applicant needs to ensure the long stay cycle parking is both secure and weatherproof, and provide full details, which should accompany
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				any future application. It is proposed to reduce off street parking spaces from 16 to 12, there are proposed to be two blue badge bays included however details in the design and access statement do not show this. it would appear that this provision of parking would meet likely and current demands, however an updated parking stress survey is required and transportation would need sight of this prior to making any updated observations. In addition to this a travel plan should be implemented to reduce employee car trips to the site and increase active travel mode shares. This can be covered by condition with an associated monitoring fee. In addition to the above there should also be consideration of the temporary construction impacts of the project, so a condition for a Construction Logistics Plan or Construction Method Statement would be appropriate. For further information and advice on transportation matters please contact Ian Pinamonti-Hyde – Transport Planner – 0208 489 1807.
Public Health		✓		Comments on new provision: The Public Health Team has reviewed the proposed Spring Lane Care Home planning application; a development of this scale should consider the impacts of the health and wellbeing on residents and communities in line with national, London and Haringey planning policy. This review focuses on the care home and not the potential impact on neighbours and the surrounding environment. Summary: A high quality care home design can have a profound effect on the experiences of those living and working within care homes. The Public Health Team recognises this proposal has some potential positive impacts on residents and staffs’ mental wellbeing and physical health. This includes windows provided in the basement of the staff dining/rest

				room and office space, the sterile visitor room and tea bars provided on some of the floors, as well as number of terraces and lounge rooms. Below is a summary of recommendations and clarification questions: <i>Fourth Floor Plans</i> It is positive to see a large lounge room to the east of the plans with a terrace for residents. This will encourage residents to move around, support their mental and physical health and improve their quality time at the care home. The fourth floor illustrates the rooms are accessible, however, we are uncertain residents can move freely into the bathrooms for Room 4.1 and 4.2, and if visitors and staff can manoeuvre around the room easily if equipment is present. Furthermore, we cannot clearly see the lifts and unsure whether this floor is for enabled persons. We need clarity on whether the whole of the fourth floor is DDA compliant. Room 4.10 has double doors – we question if this will be easy for the resident to access the room, especially if they have mobility needs. <i>Green and Open Spaces</i> The applicant is advised reconsider the huge loss of outdoor space, while the car parking space is more or less fully maintained. We could not find the plans on Landscaping and outdoor space. We would like to see intergenerational, creative and dementia friendly outdoor spaces. Seasonal planting is recommended with more opportunities for enjoyable outdoor activities with residents being involved in planting fruits and vegetables, seasonal flowers and bulbs growing in raised beds and pots. There are many health benefits, both mental and physical, of including opportunities to grow and harvest own food, which can positively impact a resident's quality of life. pg. 2 Spring Lane Care Home PH Review of Pre-App. <i>Storages</i> Sufficient storage space is an integral part of bedrooms and should consider enough space
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				for wheelchairs or other equipment such as fitted units and lockers to keep their belongings safe. We could not see wheelchair electric charging points in the plans – will the care home be providing these facilities? <i>Bedrooms</i> Many people will be used to sleeping in a double bed and feel more comfortable with this, there should be rooms with enough space to have a double bed if the person wishes. It is important to note that many residents will spend most of their time in their own rooms, we would like to ensure that their space is welcoming and big enough to enjoy their time, and time with visitors. <i>We have given an overview and suggest design support from tools and websites such as:</i> • University of Stirling audit tool is https://www.johnsmith.co.uk/product/9781857692150/dementia-design-audit-tool-2011 • There is also additional information on the DSDC website https://dementia.stir.ac.uk/design
Accessibility		✓		Any new development to this site will need to include an Access Statement in accordance with policy DM2 (Accessible and safe environments) and include Ambulance and Emergency Access information.
Sustainability		✓		<i>Comments on new provision:</i> <u>Policy Overview</u> The NPPF, London Plan and local policy require developments to meet the highest standards of sustainable design, including the conservation of energy and water; ensuring designs make the most of natural systems; and the conserving and enhancing the natural environment. London Plan Policy SI2 requires all new developments to be zero carbon, achieving a minimum 35 per cent carbon reduction on site beyond Part L 2013 of the Building Regulations. Haringey Local Plan Policy SP4 requires a 100% improvement on Building Regulations 2013 Part L, on site. Any deviation from a zero-carbon development

				must be justified. Haringey Development Management Document Policy DM21 requires developments to consider, implement and demonstrate sustainable design, layout and construction techniques. Energy Assessment The applicant should submit an Energy Assessment and a copy of the GLA's Carbon Emission Reporting Spreadsheet. These should confirm that the proposal meets London Plan Policy SI2 and Local Plan Policy SP4 for the new build floorspace as a minimum. The report should also outline how the existing building will be improved in terms of energy efficiency. New build: The report should clearly outline the baseline regulated and unregulated emissions, the Target Emission Rate (TER), Building Emissions Rate (BER), and the reduction in carbon emissions following the energy hierarchy (Be Lean, Be Clean, Be Green). The application should provide calculations for <u>both</u> SAP2012 and SAP10 carbon emission factors. A summary of the modelling work output (i.e. TER, BER worksheets) must be provided in an appendix for each stage of the energy hierarchy. The report should be written in line with current 2020 GLA guidance for energy assessments (online). Refurbishment: The report should clearly outline the baseline regulated emissions based the notional specification for existing buildings (set out in Appendix 4 of the Energy Assessment Guidance, 2020, which is based on Approved Documents L1B and L2B as well as the Government's Building Services Compliance Guidance). If the building(s) are more efficient than the Notional Specification for Existing Buildings, evidence must be provided to substantiate different inputs into the baseline model. This information will feed into the Reduced Data SAP. The report should also set out the existing space heating demand. <u>Historic buildings:</u> Improving the energy efficiency in heritage assets requires a building-specific, sensitive approach. Careful thought needs to be given to improving the energy performance and
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				comfort levels of the historic building whilst respecting the special features of interest of the heritage assets. A whole-building approach must be taken to improve the energy efficiency of the proposed use of the historic buildings and any extensions, ensuring that high value elements of the historic building are not irreversibly altered. Full analysis on the existing and proposed internal heat gains (solar, occupancy, equipment) and heat losses (fabric, ventilation), should be provided in conjunction with analysis on moisture movement (condensation etc), fabric properties and the relationship between old and new materials. Suitability of proposed materials will need to be negotiated, and applicants should carefully consider their hygrothermal properties. Taking a sensitive fabric first approach to historic buildings will improve the lifespan of the building, significantly reduce energy bills and maintenance costs for future occupiers and reduce risk of condensation, mould growth, damp and poor indoor air quality. Installing solar photovoltaic panels and/or ground or air source heat pumps may be appropriate where these are unobtrusively inserted on and around the historic building and avoid the front so to mitigate impact on the original facades and on the character and appearance of the Conservation Area, if any. Unobtrusive siting, modest proportions and a minimalist appearance are key to successful equipment integration with historic buildings and places. Furthermore, the operational regulated and unregulated energy use of the building should be reduced; this includes improved lighting, efficient equipment and appliances, low heating and cooling demand. In this case, the advice under this section is for information only as the retention of the building is not a pre-requisite. <u>Be Lean</u> New build: A 'fabric first' approach should be prioritised, aiming to achieve very high fabric efficiency standards with passive design. This should represent, at the minimum, a 15% reduction with SAP2012 carbon emission factors, in line with London Plan Policy SI2. Designs should
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				integrate and aim for Passive House standards. This should be achieved through high levels of insulation and thermally efficient materials, air tightness, good ventilation and low-energy lighting. Daylight levels should be maximised to reduce the need for artificial lighting. This can be achieved through dual and triple aspect spaces. Refurbishment: Taking a fabric-first approach to improving the energy efficiency of existing buildings is strongly encouraged. This should be achieved through high levels of insulation of existing building elements (floors, walls, roofs adjacent to unheated spaces), upgrading existing glazing and doors, reducing draughts around window/door openings, services, and by repairing existing fabric, and improving ventilation in line with improved thermal insulation. Low-energy lighting should also be included. Reports should include the Target and Design Fabric Energy Efficiency Standard (FEES) and aim for a maximum space heating and cooling demand for all uses of 15-20 kWh/m²/year. <u>Be Clean</u> The site is not close enough to any currently forthcoming Decentralised Energy Networks. The Energy Strategy should assess whether there are any other (waste) heat sources or energy centres that the site could be connected to. <u>Be Green</u> The Council's Policy SP4 requires 20% of the site's energy loads to be delivered via renewable technologies. The energy strategy should assess the feasibility and maximise the output of solar PVs, solar thermal, heat pumps and other renewable energy technologies to generate heat and electricity. The planning application must provide details of the seasonal efficiency, output, location and type of proposed technology. If proposing solar PV, the report should set out how the electricity generation will be used <i>on site</i> as far as possible, e.g. to power individual homes, communal areas and the heat pumps. <u>Be Seen</u>
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				London Plan Policy SI2 requests all developments to ‘be seen’, to monitor, verify and report on energy performance. The GLA requires all major development proposals to report on their modelled and measured operational energy performance. This will improve transparency on energy usage on sites, reduce the performance gap between modelled and measured energy use, and provide the applicant, building managers and occupants clarity on the performance of the building, equipment and renewable energy technologies. Guidance can be accessed via the GLA website. Information needs to be submitted at the following stages: 1. Planning submission stage (webform now online) 2. As-built stage 3. In-use stage for five years The applicant should install smart metering equipment on site. A post-completion Energy Statement will be secured through a S106 to confirm the scheme’s performance against the targets. Within six months of completing construction works, ‘As-Built’ SAP/SBEM calculations must be submitted confirming the secured fabric efficiencies and energy provision measures have been delivered. The applicant will also confirm any shortfall that will need offset through the carbon offset contribution. <u>Carbon Offsetting</u> If the applicant does not achieve policy compliance of reducing 100% emissions on-site, the remaining emissions would need to be offset. The cost of offsetting is currently £2,850 (£95 per tonne over 30 years). The carbon price will be set at the most current price at the point of determination of the planning application (therefore taking into account any changes at the GLA or local level). <u>Overheating</u> London Plan Policy SI4 requires developments to minimise adverse impacts on the urban heat island, reduce the potential for overheating and reduce reliance on air conditioning
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				systems. Through careful design, layout, orientation, materials and incorporation of green infrastructure, Local Plan Policy DM21 requires designs must reduce overheating in line with the Cooling Hierarchy. There is risk of overheating in new development and existing buildings, particularly for vulnerable users. Passive shading and ventilation need to be designed into the scheme from the outset for windows facing east, south and west and should be retrofitted for the existing building, where necessary. With potential noise and air pollution sources from Fortis Green, or due to the potential for crime at ground floor bedrooms, simple passive cooling (opening the windows) may not be a viable option. As set out in the Energy Assessment Guidance, the applicant has to undertake a dynamic thermal model assessment in line with CIBSE TM59 (to ensure bedrooms are modelled for their risk during the night time), using the TM49 Design Summer Years (DSY) for London. These incorporate the urban heat island effect and the severity of hot events in London. The applicant should: • Model the proposed mitigation measures for all weather files and weather patterns: DSY1-3 for the 2020s, 2050s and 2080s time periods, in the <u>London Weather Centre</u> dataset; • Mandatory compliance with DSY1 for 2020s weather file (high emissions, 50% percentile); • Implement mitigation measures to comply as far as feasible for DSY 2 and DSY 3 (2020s weather file); • Propose mitigation measures as part of a retrofit plan for future weather files (2050s and 2080s). • Model the following most likely to overheat rooms: • All single-aspect rooms facing west, east, and south; • At least 50% of rooms on the top floor; • 75% of all modelled rooms facing South or South/West;
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				• Rooms closest to any significant noise and / or air pollution source, with windows closed at all times (with cross reference to the Noise and the Air Quality Assessments to demonstrate the most sensitive receptors); • Habitable communal spaces (e.g. communal living/dining rooms in care homes); • Most at-risk communal corridors; • Include annotated floor plans to show the modelled dwellings and rooms in context of the wider development and annotate all rooms with unique reference numbers that can easily be identified on floorplans. The retrofit plan should demonstrate what measures could be installed to mitigate future overheating risk. A strategy should be designed as to how measures can easily be retrofitted when the weather patterns increase temperature. This should ensure, for example, that the structure can accommodate the fitting of additional shading or ventilation measures. These measures should be chosen in line with the Cooling Hierarchy, and it should therefore not focus on cooling but passive design measures. The report must also identify who will own the overheating risk, such as the managing company. Sustainability Assessment Local Plan Policy DM21 requires proposals to demonstrate adequate consideration for sustainable design, layout and construction techniques. The Council expects the highest possible sustainability standards are achieved on-site. A Sustainability Assessment needs to be submitted as part of the planning application demonstrating it complies with policy. <u>BREEAM Care Home (or equivalent)</u> Policy SP4 requires all new non-residential developments to achieve a BREEAM rating 'Very Good' (or equivalent), although developments should aim to achieve 'Excellent' where achievable. We expect a BREEAM pre-assessment to be submitted at application stage and that the development registers for full certification with BRE. <u>Sustainable Materials</u>
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				In line with Policy DM21, materials should have high environmental performance ratings. The GLA's Sustainable Design and Construction SPD states that natural, non-toxic, high in their recycled content, low embodied energy materials should be considered and specified through the BRE Green Guide where possible. London Plan Policy SI2 requires developments referable to the Mayor to reduce the embodied energy of their proposals. Although this is not a referable application, the applicant should consider the embodied energy required to demolish, fill in, excavate and rebuild. Where feasible, materials should be re-used from the existing buildings and site by undertaking a Pre-Demolition Survey, or otherwise ensure these can be re-purposed elsewhere. The scheme should be designed with the end-of-life stage in mind, with the ability to disassemble. The applicant should set out how this will be delivered in the Design and Access Statement or Sustainability Statement. <u>Urban Greening</u> All development sites must incorporate urban greening within their fundamental design and submit an Urban Greening Factor Statement, in line with London Plan Policy G5. London Plan Policy G6 and Local Plan Policy DM21 require proposals to manage impacts on biodiversity and aim to secure a biodiversity net gain. Additional greening should be provided through high-quality, durable measures that contribute to London's biodiversity and mitigate the urban heat island impact. This should include tree planting, shrubs, hedges, living roofs, and urban food growing. Specifically, living roofs and walls are encouraged in the London Plan. Amongst other benefits, these will increase biodiversity and reduce surface water runoff. The current proposed amenity space appears to be very small in relation to the amount of car parking available. Residents and staff members will benefit from a larger amenity space in terms of their physical and mental wellbeing. In addition, more meaningful biodiversity measures should be incorporated: seek to include living roofs on the flat roof of the extension (and the existing building if possible), and include more biodiverse border planting (i.e. hedges, plants and flowers that flower at different times of the year).
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				The architectural model should incorporate the required substrate depths for an extensive living roof: at least 120mm deep (with varying settled depths between 120-180mm). All landscaping proposals and living roofs should stimulate a variety of planting species across the year. Mat-based and sedum systems are not accepted as they deliver limited biodiversity advantages. A living wall is also encouraged at the blank façade at the site entrance. A root-based trellis system is proposed; using climber species that do not attach to the brick walls are preferred. This should be rooted in the ground with sufficient substrate depth. These requirements are in line with academic research and the Living Roofs and Walls Technical Report by Design for London (2008). Living roofs should be accessible for regular maintenance and should be regularly tended to in the first few years to ensure the roofs are able to establish. <u>Climate Change Adaptation</u> Developments of this type should consider the impact of climate change, preparing an adaptation strategy for residents to become more resilient against the impacts of climate change. This should include adaptation to increased risk of flooding and wind-based impacts from more frequent and severe storm events, longer periods of drought (in relation to the soft landscaping and limiting occupant water use), more intense and longer heatwaves. <i>Comments – points to address in the event of full application submitted:</i> 1. Passive design approaches to reduce energy demand (balancing heating and cooling demand) for the new build extension and existing building a. Proposed energy performance of building elements (and improvements to existing elements) 2. Indicative reduction in emissions (including proposed space heating and hot water and renewable energy strategy) and energy consumption target 3. List and plans of proposed rooms/rooms to model for overheating risk and indicative overheating results across entire development 4. Indicative BREEAM Pre-Assessment results for Care Homes 5. High-level strategy to reduce embodied carbon and design for disassembly
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				Comments on new provision: In addition to the advice above, all new applications submitted from 1st January 2023 need to include energy statements under the new Building Regulations for Part L, in line with the new GLA Energy Assessments Guidance (2022). GLA's new guidance has now been implemented, effectively enforcing the Building Regulations Part L 2021 (which came into effect 15th June 2022) for new applications. - You will have to report on: % reduction in emissions on Part L 2021 (still with a minimum 35% reduction, in line with GLA Policy SI2) - Carbon offset contribution (same price) - Primary Energy Factor - Energy Use Intensity and Space Heating Demand - GLA guidance sets voluntary targets in their guidance
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Next steps

If you decide to proceed with applying for Planning Permission, the following information will be required when you submit your application:

1. The completed householder application form or full application form if the property is a flat (available on our website or from the [Planning Portal](#))
2. Location plan at a scale of 1:1250 with a red line around the site in question.
3. Site plan at a scale of 1:500 or 1:200 showing the direction of North, the proposed development in relation to the site boundaries and written dimensions.
4. Existing and proposed plans (elevations, floor plans, roof plans and section where appropriate). All plans/elevations must have a scale bar and dimensions.
5. Fee.
6. Design & Access statement

Development Management, Placemaking and Housing,
5th Floor, Alexandra House, 10 Station Road, Wood Green, London N22 7TR

preapp@haringey.gov.uk

www.haringey.gov.uk

7. Transport statement and parking survey
8. Daylight & sunlight report
9. Energy Statement (including new GLA Energy Assessment Spreadsheet (2022))
10. GLA carbon emission reporting spreadsheet
11. Dynamic Thermal Model Overheating Assessment (CIBSE TM59)
12. Sustainability Statement: BREEAM Pre-Assessment with a table to demonstrate which credits will be met, how many are met out of the total available, under which category, which could be achieved and which will not be met
13. Revised Care Need Assessment
14. Planning Statement
15. Statement to outline joint delivery of two schemes (e.g. unilateral undertaking)
16. Other Transport related documents as listed above

The planning application process

Once you have submitted your planning application (this is not encouraged with the proposal's current form), it goes through a number of steps:

1. **Validation/Checking**

Applications are checked to make sure all required documents and fees are there, and checked for any potential issues which need addressed to ensure compliance with policy, if considered 'valid' and likely to be acceptable they are registered, applications are only checked when an officer is available so there can be a number of weeks before an application is validated and checked.

2. **Registration**

The application is entered into the register of applications and customers are informed formally that their application is registered, their application reference number, their case officer and the deadline they can expect to hear back by.

3. **Consultation** (a minimum of 21 days following registration)

Details of the application will be provided to neighbours in line with our consultation policy and they will have the opportunity to comment on the proposed development. Consultees are given a minimum of 21 days to comment on an application.

4. **Decision** (Usually as soon as the consultation has ended).

The planning service can deal with most householder applications under delegated powers and will issue a decision notice to stating whether the application has been approved or refused, and if there are any conditions that must be met.

Carrying out building works

Once you have planning permission, it is recommended that you obtain technical advice regarding building control matters. Building Control services ensure that the works carried out by your appointed builders are done safely. Building Control services can be found through your local council or an Approved Inspector service.

Haringey Building Control has extensive experience in working with clients on a wide range of projects. Should you wish to discuss your project and how Haringey Building Control may best advise you regarding compliance with relevant building control regulations, please contact Building Control on 020 8489 5504 or by email on building.control@haringey.gov.uk

List of relevant contacts

Planning Officer: Tania Skelli
Phone: 079 660 40685

INFORMATIVE

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.



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