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Development Management
Haringey Council
6th Floor, River Park House
225 High Road
London
N22 8HQ

For the attention of Sarah Madondo, Planning Case Officer

Dear Sarah Madondo

Planning Application Ref: HGY/2022/4553

Description: Erection of five two storey dwellings together with landscaping and other associated works at 18 Denmark Street' (RE-CONSULTATION ON AMENDED SCHEME).

I write in connection with the above planning application. This application represents an amended iteration of a scheme previously submitted in December 2022 and consulted on in January–February 2023. At that time, I submitted a lengthy letter, detailing my reasons for objecting to the previous scheme. Having examined the plans for the revised scheme in detail, alongside a renewed review of the previous iteration, I am extremely disappointed to find that the vast majority of my concerns have not been addressed. I therefore object strongly to the development of these dwellings, as per my letter of 1 February 2023, to which I refer you for a detailed explanation of my complaints. I urge you to assess the revised proposals against the numerous policies enumerated therein and summarised at the end of this letter – these demonstrate how the proposals will be contrary to the NPPF, Local Plan and London Plan.

In recognition of the revisions incorporated into the current scheme, I wish to make the following specific observations:

1. It is understood that one of the key factors leading to the revised design was the concerns raised by Haringey's Carbon Management team in relation to overheating. While the application now appears to demonstrate application of the London's Plan's Cooling Hierarchy and has accordingly identified the need for mechanical cooling in order to ensure

compliance with TM59 criteria, this hardly seems like a solution that guarantees the development's sustainability over many decades. The development satisfies only the bare minimum at the current moment in time. Given the direction of travel for planning policy, which is aspiring to ever higher standards to mitigate the impacts of climate change and reduce reliance on fossil fuels, it would seem self-evident that such a development needs to aim to a higher standard, in order to guarantee its longevity and ultimate sustainability.

2. Separation distances from the surrounding houses are only very marginally improved over the previous iteration, and there has been no substantial improvement to the daylight/sunlight impacts – the proposal therefore remains contrary to Haringey Development Management DPD Policies DM1, DM7 and DM12 and London Plan Policies D3 and D6.
3. It is recognised that a 1-bedroom, 1-person dwelling, with a GIA of 38m² (former Unit 5) and a 1-bedroom, 2-person dwelling, with a GIA of 50m² (former Unit 6) have been replaced with a 2-bed, 2-storey dwelling of 68.5m² of GIA. While this has removed the completely non-compliant former Unit 5 from the previous iteration, the new Unit 5 does not comply with the Nationally Described Space Standards either, which require a minimum of 70m² for a 2-bedroom, 2-storey dwelling. Notably, the proposal also does not comply with London Plan policy S4 and Haringey Strategic Policy SP13 by not meeting the aspirational standard of 10m² of children's informal or formal play space per child, providing only c. 45m² of 'communal playground' for the assumed 9 children expected to inhabit the development.
4. I must stress that the development still fundamentally does not comply with Building Regulation M4(2) relating to accessible dwellings and thus does not comply with Haringey's Strategic Policy SP2, which requires 90% of new housing to meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'.
5. Pressure on on-street parking needs to be reconsidered in light of the changing circumstances in the area over the last year, particularly with the increase in events taking place at Tottenham Hotspur Stadium and the creation of a new 15,000-capacity venue nearby at the Drumsheds (the latter of which is not taken into consideration under the current Tottenham Event Zone CPZ).
6. Waste provision on site still does not conform to the specific requirements set out in Haringey's Sustainable Design and Construction DPD nor those of British Standard BS5906:2005 Code of Practice for waste management in Buildings, which forms the basis of the London Plan's Housing SPG Standard 23, as the distance of the bulk waste containers for Units 1–5 far exceeds the maximum 10m from the street. The proposal therefore does not comply with the requirements under Strategic Policy SP6, Development Management DPD Policy DM4 or London Plan Policy D6.
7. Because the only means of escape for Units 1–5 will be through the narrow undercroft within the existing terraced house at No. 18 Denmark Street, there is no alternative means of escape should the existing entrance be impassable due to a fire and no possibility of a fire truck (or ambulance) being able to enter the site. The proposal is therefore contrary to the London Plan, by virtue of not being compliant with British Standard BS5906:2005 Code of Practice for waste management in Buildings and, by extension, not compliant with the

Housing SPG; it is also not compliant because it does not provide the 'highest standards of fire safety', as instructed by Policy D12, nor does it provide satisfactory emergency access, as required by policies D5 and D11.

In addition to the adopted national, regional and local planning policies, I also urge you to consider Haringey Council's most recent Corporate Delivery Plan 2023 to 2024, which not only stresses the importance of putting 'resident voice and experience at the heart of everything' the Council does and ensuring residents 'participate in formal council decision-making' but directs the Planning team to 'ensure all new homes in Haringey will be the correct mix of affordable, bedroom size and wheelchair accessible and developed to improve community space, green space and public realm' and to 'work with residents to use creative ways to design developments that promote healthy activities and deter antisocial behaviour'.

At the core of both the NPPF and Haringey's Local Plan is a 'presumption in favour of sustainable development'. As detailed in this letter and my previous objection letter of 1 February 2023, by virtue of impacts on privacy; impacts on outlook and overbearing effects; reduction in natural light; likely increase in noise and light pollution; quality of housing accommodation and amenity; accessibility; design quality; parking and traffic impacts; waste management; fire strategy; loss of open space; security issues; lack of details of management, maintenance and construction; and lack of community consultation, the proposed development is contrary to both the NPPF and the Local Plan, particularly Policy SP0 of the Strategic Policies.

However, the principle of residential development on the site remains acceptable. It is recommended that any potential development on the site should be smaller in scale and more proactively seek to provide the highest quality of residential accommodation and reflect the prevailing character of the area, including the openness of the site, while making adequate provision for refuse and access for emergency services.

Sincerely,



Camilla Gersh

15 Denmark Street

Summary of reasons for objection and schedule of policies with which proposal HGY/2022/4553 does not comply

Impact on privacy – Development Management DPD policies DM1, DM7 and DM12; London Plan 2021 policies D3 and D6;

Impact on outlook and overbearing effects – London Plan policy D3;

Reduction in natural light –Development Management DPD Policy DM1; London Plan Policy D6;

Increase in noise and light pollution – Development Management DPD policies DM1 and DM23; London Plan policies D3, D6, D13 and D14;

Quality of housing accommodation – Haringey Strategic Policy SP2; Development Management DPD Policy DM12; London Plan Policy D6; Mayor of London Housing SPG Standard 24; Nationally Described Space Standards;

Quality of amenity – NPPF Paragraph 130; Strategic policies SP2 and SP13; Development Management DPD Policy DM12; London Plan policies S4 and D6; Housing SPG Standard 26;

Accessibility of development – Strategic policies SP2 and SP11; Development Management DPD Policy DM2; London Plan policies D5 and D7;

Design quality – NPPF Section 12; Strategic Policy SP2; Development Management DPD policies DM2, DM7 and DM12; London Plan policies GG1, GG2, D3 and D6;

Pressure on existing car parking – NPPF Paragraph 104; Development Management DPD Policy DM32;

Lack of disabled parking provision – Development Management DPD Policy DM32; London Plan policies T6 and T6.1;

Servicing and emergency vehicle access – London Plan policies D3, T6 and T7;

Waste management – Strategic Policy SP6; Development Management DPD Policy DM4; London Plan Policy D6; Haringey Sustainable Design and Construction DPD; Housing SPG Standards 22 and 23;

Fire strategy – London Plan policies D5, D11 and D12;

Excessive loss of open space – Strategic Policy SP13; Development Management DPD policies DM12 and DM20; London Plan policies GGF2 and G1;

Security – NPPF paragraphs 92 and 130; Strategic Policy SP11; Development Management DPD Policy DM7; London Plan Policy D11; Secured By Design: Housing guidance;

Insufficient details on management, maintenance and construction – Strategic Policy SP11; Development Management DPD policies DM1 and DM21; London Plan policy T7;

Lack of community consultation – NPPF paragraphs 126 and 132; Strategic policy SP0; London Plan Policy GG1;

Inaccuracy of application material – NPPF Paragraph 130; Haringey Strategic Policy SP2; Development Management DPD Policy DM12; London Plan policies S4 and D6; Mayor of London Housing SPG standards 24 and 26; Nationally Described Space Standards