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Planning, Regeneration & Economy
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Wood Green
N22 8HQ

12 April 2024

SENT VIA PLANNING PORTAL

Dear Sir/Madam,

RE: Application for installation of 5kw Air Source Heat Pump – Flat 1, 327 Archway Road, N6 5AA

This application is made on behalf of the applicant, Aira Homes (our client) by RCA Regeneration Ltd, and seeks planning consent for the installation of a 5kw Air Source Heat Pump (ASHP) on the property known as Flat 1, 327 Archway Road, N6 5AA (the application site). The proposed ASHP seeks to provide the entire property with a clean source of heating and hot water, without the need to burn gas or oil. This application is made because the proposed development would not constitute permitted development.

Enclosed with this submission are the following necessary documents to validate the application:

- Site Location Plan (1 : 1250)
- Site Block Plan (1 : 100)
- Indicative Elevation Plans
- 'Vaillant' Specification Data
- Heat Loss Report

Under Section 62 of the Town and Country Planning Act 1990 (as amended), it is considered that the information submitted with this planning application is sufficient to allow determination.

The remainder of this supporting letter sets out the general planning case with the report split into the following sections:

- Property Description
- Planning History
- Proposal
- Development Plan
- Other Material Considerations
- Summary

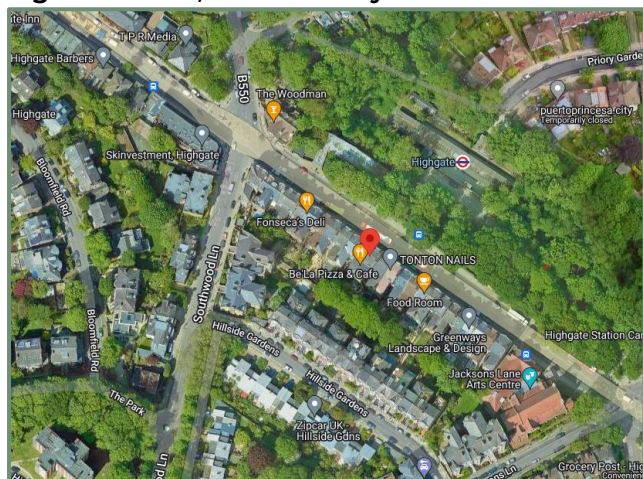


Property Description

The property is a compact 1-bedroom ground and 1st floor flat (over two-storeys), situated at the rear of 327 Archway Road (unlisted). Archway Road is fronted by a small high street with ground floor commercial and retail units. The property is within a Conservation Area, with the principal frontage (1st floor and up) of Archway Road (including 327) contributing positively to its historic character.

The property is neighboured by similar size and character flats along Archway Road. To the south-west of the property is a mature treeline and Public Right of Way, creating separation and screening from neighbouring properties to the rear along Hillside Gardens. The Highgate underground station is 50m north of the property.

Figure 1: Flat 1, 327 Archway Road – Aerial View & Rear View



Planning History

The property has a number of previous householder application regarding various alterations and extensions:

Application Reference	Proposal	Decision Date	Decision
CON/2019/0376	Self-seeding Ash: fell because of excessive shading and random location. Also starting to damage party wall.	2019	Approved
HGY/2019/1227	Erection of an ancillary outbuilding to the rear garden.	11/06/2019	Approved
HGY/2019/2545	Erection of rear ground floor conservatory (Class use C3).	29/10/2019	Approved
HGY/2022/2560	Non-material amendment following a grant of planning permission HGY/2019/1227 for amendment to install a toilet/ sink in the consented ancillary outbuilding.	14/08/2023	Approved

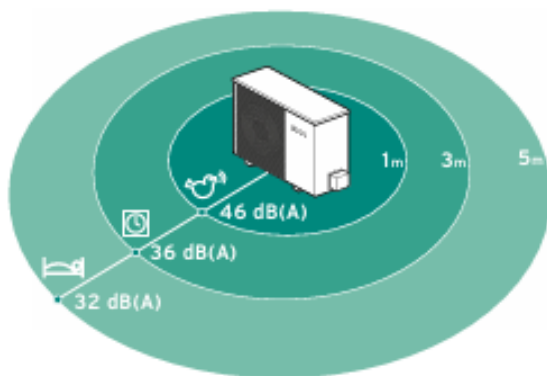
It is not believed that any of the previous planning decisions would impact upon the installation of a 5kw Air Source Heat Pump in the location shown.

Proposal

This application proposes the installation of a 5kw Air Source Heat Pump at the property known as Flat 1, 327 Archway Road N6 5AA. The particular model of ASHP proposed is the Vaillant 5kw boasts a number of benefits associated with producing heating and hot water without the need for burning gas:

- Hermetically sealed – Requiring no refrigerant certification.
- Sound safe system – Raised to absorb vibration and reduce noise.
- Vortex Sensor – For accurate performance analysis.
- Weatherproof materials – Increasing longevity.
- Integrated tray and trace heater – Providing clear condensation run.

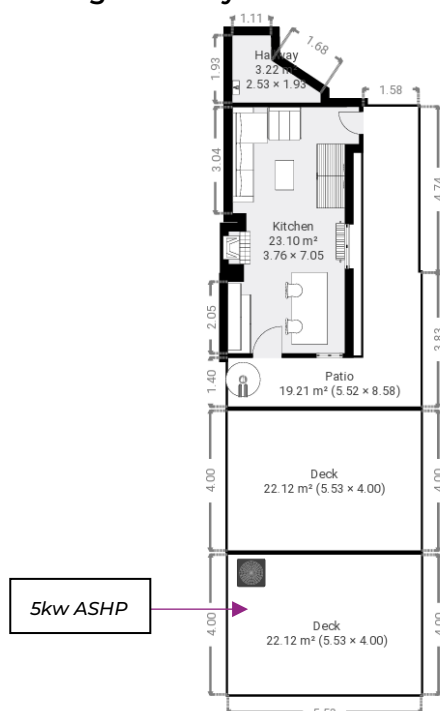
Notably, the ASHP produces a controlled level of noise at as low as 32dB from 5m:



Model	Sound Power Level A7/W55	Sound Pressure Level		
		1m distance	3m distance	5m distance
aroTHERM plus 3.5kW	54 dB	46 dB(A)	36 dB(A)	32 dB(A)
aroTHERM plus 5kW	54 dB	46 dB(A)	36 dB(A)	32 dB(A)
aroTHERM plus 7kW	55 dB	47 dB(A)	37 dB(A)	33 dB(A)
aroTHERM plus 10kW	60 dB	52 dB(A)	42 dB(A)	38 dB(A)
aroTHERM plus 12kW	60 dB	52 dB(A)	42 dB(A)	38 dB(A)

The property owner has been notified of the application and supports the proposed ASHP installation in the rear garden/patio of Flat 1, 327 Archway Road, N6 5AA, some 5.4m south-west of the property's rear elevation. The ASHP's citing is illustrated in the drawings below and submitted with this application.

Figure 2: Layout Plan & Location



Indicative Air Source Heat Pump Location

Development Plan

Haringey's development plan is currently made up of the Strategic Policies, Development Management Policies, Site Allocations and Tottenham Area Action Plan, alongside the London Plan. The council has started work on a new Local Plan, which is intended to run from 2024 to 2039. Consultation on a first steps document ran until February 2021.

Haringey – Strategic Policies 2013 (2017 alterations)

We believe the relevant strategic planning policies are pertinent to the application for installation of an ASHP:

- Policy SP2 – Housing
- Policy SP4 – Working towards a Low Carbon Haringey
- Policy SP12 – Conservation
- Policy SP14 – Health and Well-being

Haringey – Development Management Policies (2017)

We believe the relevant Development Management DPD planning policies are pertinent to the application for installation of an ASHP:

- Policy DM1 – Delivering High Quality Design
- Policy DM2 – Accessible and Safe Environments
- Policy DM9 – Management of the Historic Environment
- Policy DM12 – Housing, Design and Quality
- Policy DM21 – Sustainable Design, Layout and Construction
- Policy DM22 – Decentralised Energy
- Policy DM23 – Environmental Protection

Haringey – Site Allocations Plan (2017)

We have reviewed the Site Allocations DPD planning policies and have concluded that as the document refers to specific development sites, there are no relevant policies relating to the installation of ASHPs.

Tottenham Area Action Plan (2017)

We believe the relevant Development Management DPD planning policies are pertinent to the application for installation of an ASHP:

- Policy AAP3 – Housing
- Policy AAP5 – Conservation and Heritage
- Policy AAP9 – Tottenham Green Grid

London Plan (March 2021)

We believe the relevant London Plan planning policies are pertinent to the application for installation of an ASHP, especially with its focus on sustainability and air quality:

- Policy GG3 – Creating a Healthy City
- Policy GG5 – Growing a Good Economy
- Policy GG6 – Increasing Efficiency and Resilience
- Policy D6 – Housing Quality and Standards

- Policy D11 – Safety, Security and Resilience to Emergency
- Policy D12 – Fire Safety
- Policy D14 – Noise
- Policy H9 – Ensuring the best use of stock
- Policy E8 – Sector Growth Opportunities and Clusters
- Policy E11 – Skills and Opportunities for all
- Policy SI1 – Improving Air Quality
- Policy SI2 – Minimising Greenhouse Gas Emissions

Other Material Considerations

National Planning Policy Framework (NPPF)

The Government updated the National Planning Policy Framework (NPPF) December 2023. The NPPF sets out the Government's planning policies and how these should be applied.

The NPPF emphasises the importance of sustainable development and notably the presumption in favour of sustainable development. The following paragraphs are deemed relevant to the installation of an ASHP at the subject property.

- **Paragraph 7:** Paragraph 7 confirms that the purpose of the planning system is to contribute to the achievement of sustainable development.
- **Paragraph 8:** Paragraph 8 sets out the overarching objectives of sustainable development, including economic, social and environmental sustainability.
- **Paragraph 11:** Paragraph 11 sets out that plans and decisions should apply a presumption in favour of sustainable development.
- **Paragraph 38:** Paragraph 38 identifies local planning authorities should approach decisions on proposed development in a positive and creative way.
- **Paragraph 96:** Planning policies and decisions should aim to achieve healthy, inclusive and safe places.
- **Paragraph 131:** The creation of high-quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve.
- **Paragraph 157:** The planning system should support the transition to a low carbon future in a changing climate, contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.
- **Paragraph 164:** Local planning authorities should give significant weight to the need to support energy efficiency and low carbon heating improvements to existing buildings, through installation of heat pumps where these do not already benefit from permitted development rights.
- **Paragraph 192:** Planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified.
- **Paragraph 212:** Local authorities should ensure development protects and enhances local heritage significance in relation to Conservation Areas.

Department for Energy Security and Net Zero – Press Release

In August 2023, the UK Government issued a press released titled *"Boost to heat pump rollout with plans for cheaper and easier installations"*, which expressed the national desire to simplify the process of installing ASHPs and qualifying for its supporting grant scheme. The key aims of the initiative are:

- Varied heat pump grants to improve access to low-carbon heating.

- Consumers to save time and money via simpler energy performance requirements.
- Heat pump vouchers offers up to £6,000 off installation, with over £81 million issued.

Since this press release the UK Government increased the maximum grant to £7,500 in October 2023, with the goal of increasing the number of ASHP installations from 55,000 per annum (currently), to 600,000 per annum by 2028. Considering home heating accounts for 38% of all UK gas use, the provision clean ASHPs is a priority for achieving the net zero goal by 2050.

Haringey – New Local Plan:

The council has begun the process of preparing a New Local Plan which will replace the existing Local Plan documents adopted in July 2017. So far, the evidence base consists of a SHMA (June 2021) and a “Delivering Net Zero Carbon” report (2023), which speaks at length about utilising Air Source Heat Pumps for achieving net zero. There is no published timetable for when the new local plan will be further consulted upon.

Supplementary Planning Documents (SPDs)

Haringey Council have produced a number of supporting planning documents for the current and emerging local plan, which are considered relevant to the proposal for the installation of a domestic Air Source Heat Pump:

- Sustainable Design and Construction SPD (March 2021)

The proposal for an ASHP installation is deemed to be aligned with the ambitions of the relevant local and national planning guidance in relation to more efficient and sustainable methods of heating homes with reduced greenhouse gas emissions and impact on the climate.

Highgate Conservation Area

The property is within the Highgate Conservation Area, as dictated by policy CSV1 and understood within the ‘*Highgate Character Appraisal and Management Plans*’. The importance of the property’s positive contribution to the Conservation Area and character area of Highgate is understood within these proposals and as such, the ASHP is proposed to the rear of the property, within its garden/patio area. As with the previous consents for rear ancillary outbuildings and conservatories, it is believed that the proposal for a 5kw ASHP would not result in any harm to the Conservation Area.

Summary

This application proposes the installation for a 5kw Air Source Heat Pump at the property known as Flat 1, 327 Archway Road. In assessing the planning balance, it is considered that the proposals are in line with all relevant local and national policies associated with the installation of ASHPs and addressing the UK’s net zero goal by 2050. The installation will provide clean and efficient heating and hot water at 300-400% efficiency compared to 80% of a traditional boiler. As detailed within the accompanying product brochure, the 5kw ASHP produces efficient heating output, whilst not exceeding 32dB in noise from 5m, therefore having a negligible impact on the living conditions of neighbouring occupiers.

We consider that in light of the supporting evidence and having regard to the relevant development plan policies and other material considerations, the proposals constitute sustainable development, and we urge you to consider them favourably without delay.

Yours sincerely,

Luke Cottrell, BSc (Hons), MSc

Planning & Development Consultant

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07495 903001

Appendix A – Elevation Drawing



Indicative Air Source Heat Pump Location

Appendix B – Site Layout Plan



Project 29

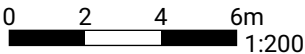
SUBMITTED BY
Damian Franczyszyn
damian.franczyszyn@airahome.co
m
07792164028

CREATED ON
2023-12-21

LOCATION
Flat 1 327 Archway Road
N6 5AA London
England
United Kingdom

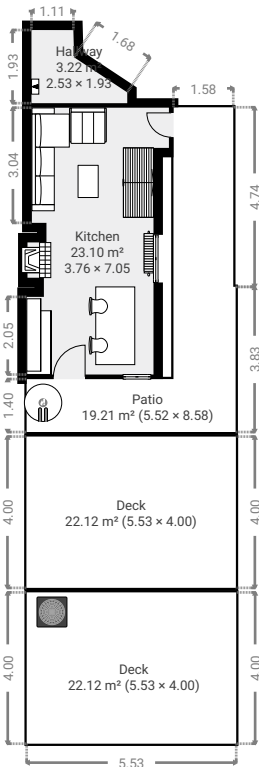
DETAILS
Total area: 112.58 m²
Living area: 49.15 m²
Floors: 2
Rooms: 5

THIS FLOORPLAN IS PROVIDED WITHOUT
WARRANTY OF ANY KIND. SENSOPIA
DISCLAIMS ANY WARRANTY INCLUDING,
WITHOUT LIMITATION, SATISFACTORY QUALITY
OR ACCURACY OF DIMENSIONS.



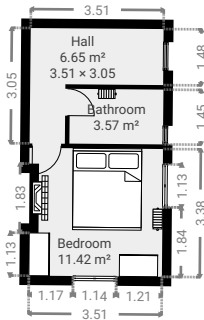
▼ Ground Floor

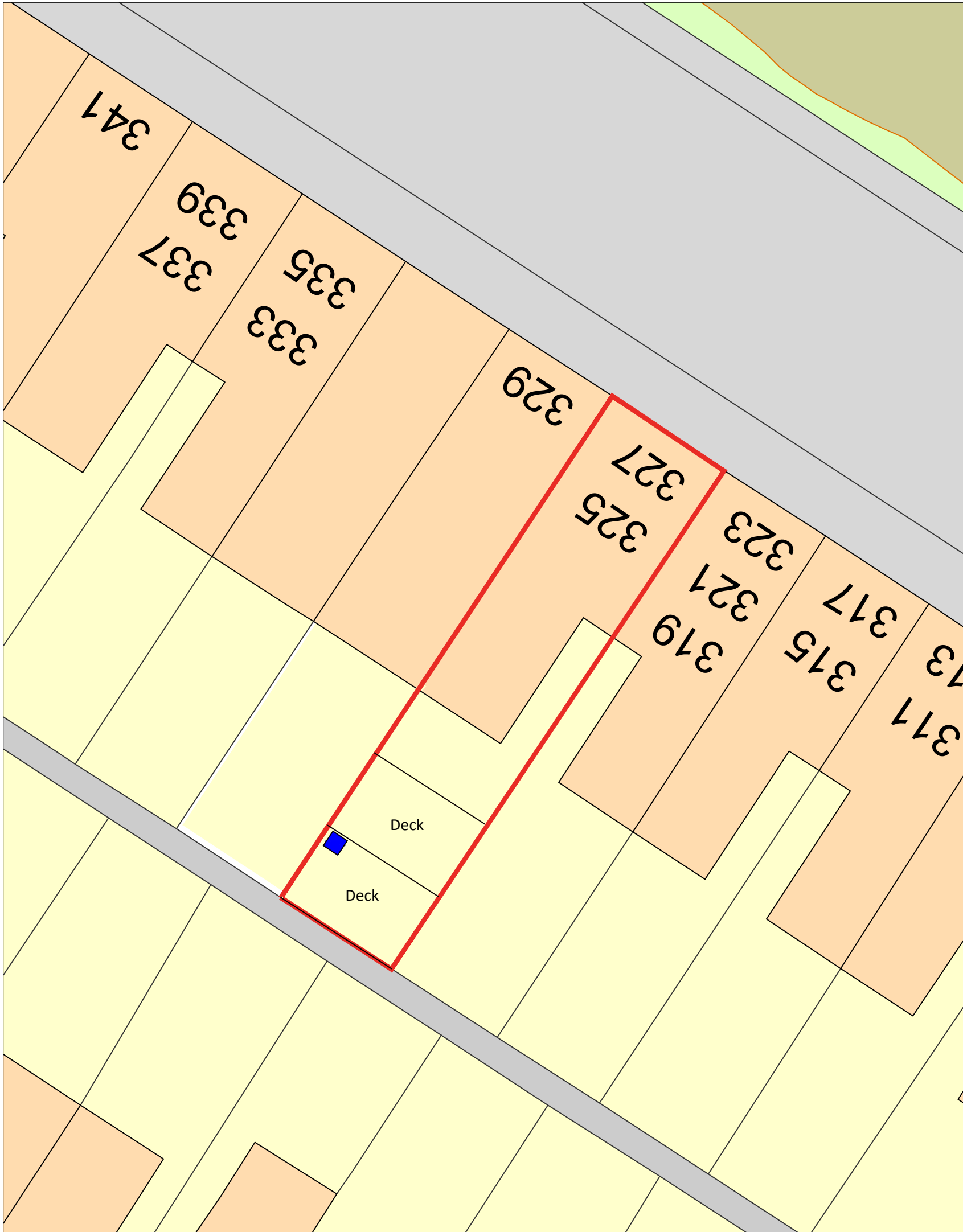
TOTAL AREA: 90.04 m² • LIVING AREA: 26.61 m² •
ROOMS: 2



▼ 1st Floor

TOTAL AREA: 22.54 m² • LIVING AREA: 22.54 m² • ROOMS:
3





Proposed location
of heat pump

Proposed Site Block Plan

