

REPORT FOR CONSIDERATION AT PLANNING SUB-COMMITTEE

1. APPLICATION DETAILS

Reference Nos: HGY/2022/4319 & HGY/2022/4320 **Ward:** Bruce Grove

Address: Edmansons Close, Bruce Grove, London, N17 6XD

Proposals

HGY/2022/4319

Full planning application for the demolition of existing laundry building and 1970s infill building; alterations and extensions to 44 existing almshouses to create 8 x 1 bed, 12 x 2 bed and 6 x 3 bed homes; alterations to existing Gatehouse to provide 1 x 2 bed homes; construction of 1 x new build 3 bed home to replace 1970s infill building; construction of a new apartment building comprising 7 x studio homes and 9 x 1 bed homes; construction of 4 x new build 2 bed homes within two new pavilions (2 homes in each pavilion, 4 homes in total); with landscaping; improvements to access; car parking; and ancillary development thereto.

HGY/2022/4320

Listed building consent for the demolition of existing laundry building and 1970s infill building; alterations and extensions to 44 existing almshouses to create 8 x 1 bed, 12 x 2 bed and 6 x 3 bed homes; alterations to existing Gatehouse to provide 1 x 2 bed home; construction of 1 x new build 3 bed home to replace 1970s infill building; construction of a new apartment building comprising 7 x studio homes and 9 x 1 bed homes; construction of 4 x new build 2 bed homes within two new pavilions (2 homes in each pavilion, 4 homes in total); with landscaping; improvements to access; car parking; and ancillary development thereto.

Applicant: The Drapers' Almshouse Charity / The Drapers' Company

Ownership: Private

Case Officer Contact: Gareth Prosser

- 1.1 These applications have been referred to the Planning Sub Committee for decision as the planning application relates to major development that is also subject to a section 106 agreement; and the listed building consent is an integral accompanying application.

1.2 SUMMARY OF KEY REASONS FOR RECOMMENDATIONS

- Although no affordable homes can viably be delivered within this scheme, the provision of new high-quality housing through refurbishment of vacant homes and new build homes, including family housing, will contribute to the Borough's housing stock and targets. The site has been fully vacant since August 2024.
- The mix and quality of new-build accommodation are acceptable and either meet or exceed relevant planning policy standards. The dwellings have private external amenity space and all dwellings are in close proximity to a substantial sized open space – the central quadrangle.
- The design and appearance of the development responds appropriately to the local context and is supported by the Quality Review Panel
- The refurbishment works to the Grade II listed chapel are welcomed and would greatly improve and enhance the character of the building as a focal building within the site and would have a positive impact on the character of the listed building. The proposal to retain and carry out improvement works to remove an unsympathetic extension and undertake internal refurbishment works to the Grade II listed building are welcomed and will greatly improve and enhance the character and appearance of the chapel as a focal building within the conservation area. Currently vacant, this heritage asset will be brought back into use and upgraded in line with contemporary housing standards.
- The proposed development would lead to less than substantial harm to the significance of the conservation area and its assets, which would be outweighed by the public benefits of the development; primarily in the form of additional housing and refurbishment of vacant listed homes and the chapel.
- The proposal would provide good quality hard and soft landscaping with 23 new trees; a net gain of 8 trees above the existing.
- The proposal has been designed to avoid any material harm to neighbouring amenity in terms of loss of sunlight and daylight, outlook, or privacy, and in terms of excessive, noise, light or air pollution.
- The revised development would be 'car free' and would provide an appropriate quantity of cycle parking spaces for this location and would be further supported by sustainable transport initiatives. There would be no significant adverse impacts on the surrounding highway network or on car parking conditions in the area.
- The development would provide appropriate carbon reduction measures and a carbon off-setting payment to provide a zero carbon development, as well as site drainage and biodiversity improvements. The scheme would meet the Council's sustainability objectives and provide an increase in urban greening and biodiversity.

The proposed development would secure several obligations including financial contributions to mitigate the residual impacts of the development.

2. RECOMMENDATION

- 2.1 That the Committee authorise the Head of Development Management and Planning Enforcement or the Director of Planning and Building Standards to **GRANT planning permission** subject to the conditions and informatives set out below and the completion of an agreement satisfactory to the Head of Development Management and Planning Enforcement or the Director of Planning and Building Standards that secures the obligations set out in the Heads of Terms below.
- 2.2 That delegated authority be granted to the Head of Development Management and Planning Enforcement or the Director of Planning and Building Standards to make any alterations, additions or deletions to the recommended measures and/or recommended conditions as set out in this report and to further delegate this power provided this authority shall be exercised in consultation with the Chair (or in their absence the Vice-Chair) of the Sub-Committee.
- 2.3 That the agreement referred to in resolution (2.1) above is to be completed no later than 27/11/2025 within such extended time as the Head of Development Management or the Director of Planning and Planning Enforcement Building Standards shall in their sole discretion allow; and
- 2.4 That, following completion of the agreement(s) referred to in resolution (2.1) within the time period provided for in resolution (2.3) above, planning permission be granted in accordance with the Planning Application subject to the attachment of the conditions.

Conditions/Informative Summary – Planning Application HGY/2022/3419 (the full text of recommended conditions/informative is contained in Appendix 1 of the report

Conditions:

1. Three years
2. Drawings
3. Materials & Design Detail
4. Demolition Works
5. Replacement Windows & Doors
6. Details for extension junctions to existing building, chimney, roof and party wall
7. Retrofitting

8. Landscaping
9. Details of ancillary buildings, including cycle store, bin stores, ASHP screening
10. Energy Strategy
11. Whole-House Retrofit Strategy and Monitoring
12. Overheating
13. Living roofs
14. Biodiversity
15. Demolition and Construction Logistics and Management Plan
16. Cycle Parking
17. Land Contamination
18. Unexpected Contamination (Pollution)
19. NRMM
20. Demolition/Construction Environmental Management Plans
21. Waste
22. Secured by Design
23. Secured by Design
24. Tree Protection Plan
25. Surface Water Drainage 1
26. Surface Water Drainage 2
27. Accessible Homes
28. Electric Vehicle Charging Point

Informatives

- 1) NPPF
 - 2) CIL liable
 - 3) Hours of construction
 - 4) Street Numbering
 - 5) Thames Water – public sewers
 - 6) Thames Water - petrol/oil interceptors
 - 7) Thames Water – groundwater protection
 - 8) Thames Water – water pressure
 - 9) Pollution - asbestos
 - 10) Secure by design
- 2.4 That the Committee authorise the Head of Development Management and Planning Enforcement or the Director of Planning and Building Standards to **GRANT Listed Building Consent** subject to conditions and informatives as set out below.
- 2.5 That delegated authority be granted to the Head of Development Management or the Director of Planning and Building Standards to make any alterations, additions or deletions to the recommended conditions set out in this report and to further delegate their power provided this authority shall be exercised in consultation with the Chair (or in their absence the Vice Chair) of the Sub-Committee.

Conditions/Informative Summary – Listed Building Consent application HGY/2022/4320 (the full text of recommended conditions/informative is contained in Appendix 2 of the report)

Conditions

1. Time period
2. Drawings
3. Building Recording
4. Demolition works to chapel and existing homes
5. External Material Samples
6. Replacement windows and doors
7. Details for extension junctions to existing building, chimney, roof and party wall
8. Servicing
9. Retrofitting
10. Staircases
11. Internal finishes & schedule of existing features
12. Structural intervention details
13. Repairs And Restoration Methodology For Exterior
14. Contingency Condition

Section 106 Heads of Terms_- Planning Application HGY/2022/4320

1. Sustainable Transport Initiatives

- Car Free Agreement - £4,000 towards the amendment of the Traffic Management Order to exclude residents from seeking parking permits
- Residential Travel Plan - Monitoring of the travel plan initiatives £3,000 for five years (£15,000 in total)
- Appointment of Residential Travel Plan Co-ordinator to monitor the travel plan initiatives annually for a minimum period of 5 years
- Provision of welcome induction packs containing public transport and cycling/walking information to every new resident, along with a £200 voucher for active travel related equipment purchases.
- £10,000 towards monitoring of the Demolition and Construction Logistics and Management Plan, which should be submitted 6 months prior to the commencement of development

2. Carbon Mitigation

- Be Seen commitment to uploading energy data

- Energy Plan
- Sustainability Review
- Estimated carbon offset contribution (and associated obligations) of £92,625 (indicative), plus a 10% management fee; carbon offset contribution to be re-calculated at £2,850 per tCO2 at the Energy Plan and Sustainability stages.

3. **Employment Initiatives**

- Participation and financial contribution towards Local Training and Employment Plan;
- Provision of a named Employment Initiatives Co-Ordinator
- Notify the Council of any on-site vacancies
- 20% of the peak on-site workforce to be Haringey residents
- 5% of the on-site workforce to be Haringey resident trainees
- Provide apprenticeships at one per £3m development cost (max. 10% of total staff)
- Provide a support fee of £1,500 per apprenticeship towards recruitment costs.

4. **Monitoring Contribution**

- 5% of total value of contributions (not including monitoring);
- £500 per non-financial contribution;
- Total monitoring contribution to not exceed £50,000

5. **Early and Late Stage Review**

- Early and late stage reviews of the viability position would be secured, with any improvement in the viability of affordable housing being captured either via on site provision of affordable housing, or a financial contribution towards providing affordable housing off-site

6. **Restoration Works**

- No more than 50% of the homes can be occupied until the restoration works to the Grade II listed Chapel are completed

2.5 In the event that members choose to make a decision contrary to officers' recommendations members will need to state their reasons.

1.6 In the absence of the agreement referred to in resolution (2.1) above not being completed within the time period provided for in resolution (2.3) above, the planning permission be refused for the following reasons:

1. The proposed development, in the absence of a legal agreement to secure early and late stage reviews the proposal would fail to provide an opportunity to secure any affordable housing that may be achievable in the future. As such, the proposal is contrary to Policy T1 of the London Plan 2021 and Policies DM31, DM32 and DM48 of the Development Management Development Plan Document 2017.
2. The proposed development, in the absence of a legal agreement to work with the Council's Employment and Skills team and to provide other employment initiatives would fail to support local employment, regeneration and address local unemployment by facilitating training opportunities for the local population. As such, the proposal is contrary to Policy SP9 of the Local Plan 2017.
3. The proposed development, in the absence of a legal agreement securing sufficient energy efficiency measures and financial contribution towards carbon offsetting, would result in an unacceptable level of carbon dioxide emissions. As such, the proposal would be contrary to Policies SI 2 of the London Plan 2021, Policy SP4 of the Local Plan 2017 and Policy DM21 of the Development Management Development Plan Document 2017. As such, the proposals would be contrary to Policies H4 and H5 of the London Plan 2021, Policy SP2 of the Local Plan 2017 and Policies DM11 and DM13 of the Development Management Development Plan Document 2017.
4. The proposed development, in the absence of a legal agreement securing.
 - 1) A contribution towards amendment of the local Traffic Management Order
 - 2) Monitoring of the travel plan initiatives £3,000 for five years (£15,000 in total)
 - 3) A contribution towards a Construction Logistics and Management Plan,
 - 4) £200 voucher for active travel related equipment purchases
 - 5) A contribution towards monitoring of the Construction Logistics and Management Plan;

would have an unacceptable impact on the safe operation of the highway network and give rise to overspill parking impacts and would not enable residential occupiers to benefit from sustainable transport options, leading to a net increase in car movements.

- 2.7 In the event that the Planning Application is refused for the reasons set out in resolution (2.6) above, the Head of Development Management and Planning Enforcement (in consultation with the Chair of Planning Sub-Committee) is hereby authorised to approve any further application for planning permission which duplicates the Planning Application provided that:

(i) There has not been any material change in circumstances in the relevant planning considerations, and

- (ii) The further application for planning permission is submitted to and approved by the Director/Head of Development Management within a period of not more than 12 months from the date of the said refusal, and
- (iii) The relevant parties shall have previously entered into the agreement contemplated in resolution (1) above to secure the obligations specified therein.

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3.0 PROPOSED DEVELOPMENT AND SITE LOCATION DETAILS

3.1 Proposed development

3.1.1. The proposal consists of two applications:

1) **Full planning application** for the demolition of existing laundry building and 1970s infill building; alterations and extensions to 44 existing almshouses to create 8 x 1 bed, 12 x 2 bed and 6 x 3 bed homes; alterations to existing Gatehouse to provide 1 x 2 bed home; construction of 1 x new build 3 bed home to replace 1970s infill building; construction of a new apartment building comprising 7 x studio homes and 9 x 1 bed homes; construction of 4 x new build 2 bed homes within two new pavilions (2 homes in each pavilion, 4 homes in total); with landscaping; improvements to access; car parking; and ancillary development thereto.

2) **Listed building consent** application for the demolition of existing laundry building and 1970s infill building; alterations and extensions to 44 existing almshouses to create 8 x 1 bed, 12 x 2 bed and 6 x 3 bed homes; alterations to existing Gatehouse to provide 1 x 2 bed home; construction of 1 x new build 3 bed home to replace 1970s infill building; construction of a new apartment building comprising 7 x studio homes and 9 x 1 bed homes; construction of 4 x new build 2 bed homes within two new pavilions (2 homes in each pavilion, 4 homes in total); with landscaping; improvements to access; car parking; and ancillary development thereto.

Description of proposal seeking planning permission

3.1.2. Planning permission is sought for works to Grade II listed homes, including internal amalgamation and rear extensions, work to the listed Gatehouse, new residential development comprising 2 x 'corner' pavilions, a new home in place of the 1970s infill building and a new 2-3 storey apartment building built to the rear of the site in the underutilised garden. The proposal involves a number of demolitions, including a single storey laundry building, the aforementioned residential infill development, unsympathetic rear extension to the existing Chapel and partial demolition of the rear façade to the existing almshouses. The proposals also include other landscape and associated enhancements to the site

3.1.3 The proposed residential development would include 7 x studio homes (14.58%), 17 x one-bedroom homes (35.42%), 18 x two-bedroom homes (37.5%) and 6 x three-bedroom homes (12.5%). Three of the new one bed flatted dwellings would be wheelchair-accessible and located at ground floor level of the proposed apartment building. The new residential blocks will be contemporary in style and finished in buff-yellow brick to match the existing almshouses, with a darker buff brick to projecting horizontal banding, to provide a slight contrast similar to the red brick horizontal bands of the existing almshouses.

- 3.1.4 The proposed scheme would be 'car-free' whilst providing five on-street 'blue badge' parking spaces, with residents/occupiers applying for a designated on street blue badge bay.
- 3.1.5 Soft and hard landscaping is proposed around the site, notably the central quadrangle, private gardens, and at roof level. The landscaping would comprise of new tree planting, hedge planting, living roofs, grassland, permeable block paving.

Demolition of proposal seeking listed building consent

- 3.1.6 Listed building consent is sought for refurbishment/restoration works to the existing chapel and homes.

The proposed works include the following:

- Demolition of existing laundry building and 1970s infill building
 - Alterations and extensions to 44 existing homes to create 8 x 1 bed, 12 x 2 bed and 6 x 3 bed homes
 - Alterations to existing Gatehouse to provide 1 x 2 bed home
 - Construction of 1 x new build 3 bed home (to replace 1970s infill building);
 - Construction of a new apartment building comprising 7 x studio homes and 9 x 1 bed homes; construction of 4 x new build 2 bed homes within two new pavilions (2 homes in each pavilion, 4 homes in total);
 - Landscaping; improvements to access; car parking; and ancillary development thereto.
- 3.1.7 The planning application has been amended since initial submission. Many existing window and door arrangements on the rear lean-tos are now retained. Half of each of the amalgamated almshouses retain their original form. In summary the changes include:
- House Type 1 change: Retain existing rear elevations and change door to fully glazed
 - House Types 2 and 3 change: Retain half the existing rear elevation and change door to fully glazed (as house type 1)
 - Add double glazed doors to the other half (to living room side) to replace sash window and single door
 - Additional photovoltaics (PVs) have been added to the new build elements of the development
 - Air Source Heat Pumps (ASHPs) are to be provided to all homes other than the 8 x 1 bed homes which would utilise electric-combi boilers
 - Floor and wall insulation added to the almshouses
 - New screens added to the south elevation of the apartment building

3.2 Site and Surroundings

- 3.2.1 The site, which is located within Bruce Grove Ward, fronts Bruce Grove to the south with buildings wrapped around a large, lawned quadrangle. The site is bounded by Lordship Lane to the North, Bruce Grove and Hartham Road to the south.
- 3.2.2 There are important views both into and from the main quadrangle, specifically from Lipley Road and along Bruce Grove. Located to the rear of the site is the Tottenham Magistrates Court building and further afield, Elsdon Road, a row of terraced Victorian houses whose gardens back onto former allotment gardens.
- 3.2.3 At the centre of the site is a former chapel, flanked either side by two-storey, Victorian terraces of almshouses, enclosing the central quadrangle on three sides with the south-west side open to Bruce Grove. The chapel building and almshouses are Grade II statutory listed buildings and the entirety of the site is located within the Bruce Grove and All Hallows Conservation Area.



Fig 1. The site from above (looking north)

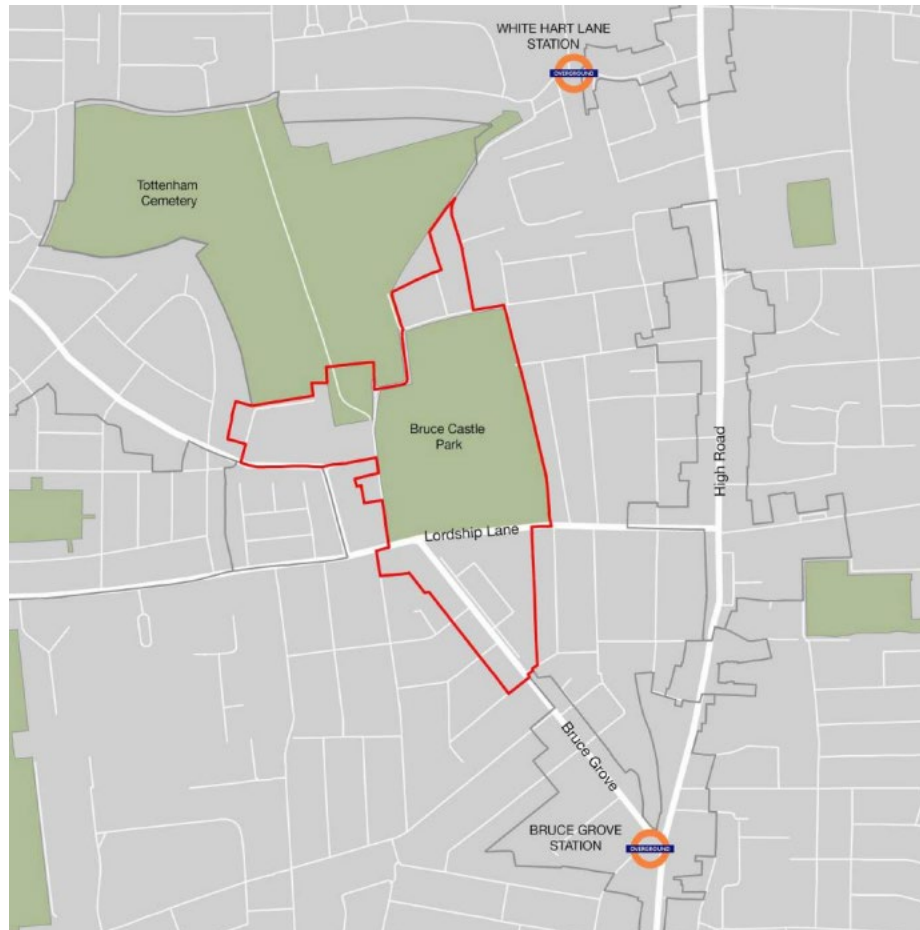


Fig 2. Bruce Grove and All Hallows Conservation Area.

- 3.2.4 To the south of the site, lies the original Gatehouse or Lodge Building which is also a Grade II listed building and was the original access point into the site. Adjacent to the Gatehouse is a 1970s residential infill building providing further accommodation. To the rear of the infill there is a small, single-storey laundry building dating from the 1970s, in a poor state of repair. This is not a listed building and is considered to detract from the heritage assets.
- 3.2.5 Two new access points were built later which allows vehicular entry into the site. There are a number of cherry trees in the quadrangle and some larger trees to the rear. Shrubs and smaller trees align the site along Bruce Grove.
- 3.2.6 The site has a public transport accessibility level (PTAL) of 5, which is rated as 'very good' access to public transport services. There is existing informal parking around the perimeter of the green space.
- 3.2.7 The estate currently contains 61 dwellings consisting of 48 x studios, 1 x 1 bedroom flat and 12 x 2 bedroom flats, all of which are self-contained and surrounded by communal gardens.

3.2.8 The site is located just outside of the Tottenham Area Action Plan (AAP) area and excluding its heritage and building conservation status, the site has no specific planning policy designations.

3.2.9 In summary the site contains the following structures:

- A chapel
- Converted homes, built as almshouses (studios and 1 & 2-bedroom flats - see para. 6.3.43 for full breakdown)
- Gatehouse/Lodge (2 studios)
- 1970s Infill block (8 studios)
- Prefab laundry building

Drapers Alms-housing

3.2.10 Built circa 1868, the above properties are owned by The Drapers' Almshouses Charity who have retained ownership ever since. The Drapers' Company is a philanthropic enterprise, originally established to regulate the trading of woollen cloth in the medieval City of London but today is responsible for charitable and philanthropic activities. The objectives of the charity are:

- The provision of housing accommodation for persons who are in need and resident in the area of benefit, defined as Greater London; and
- Such charitable purposes for the benefit of the residents at the accommodation provided by the charity as the trustee shall decide.

3.2.11 It has been the practice of the charity to use its assets and the income generated to provide housing accommodation to people in need. The charity has three almshouse sites: Queen Elizabeth's College, Greenwich; Walter's Close, Southwark; and Edmansons Close, Haringey. Historically the homes have been occupied by residents under licences, at a reduced price.

3.3 Relevant Planning and Enforcement history

HGY/2016/2725 Listed building consent Approve with Conditions 06/10/2016
Listed building consent for internal alterations and amalgamations to create larger dwellings. Proposals involve a reduction in homes from 50 studios, 2 x 1 bed flats and 9 x 2 bed flats to 23 x 2 bed houses and 8 studios.

4. CONSULTATION RESPONSES

4.1 Quality Review Panel

4.2.1 The scheme has been presented to Haringey's Quality Review panel on three separate occasions, including one Chair's review.

- 4.2.2 Following the final Quality Review Panel meeting June 2022, Appendix 5, the Panel is ‘warmly supportive of the scheme’, with the summary from the report below;

The panel ‘supports the scale of the proposals, the refurbishment of the chapel, the extension of the almshouses and the adjustments to the infill building on Bruce Grove.

However, there are still some aspects of the proposals that would benefit from some further consideration. These include the arrangements for cycle parking, the entrance sequences, and circulation layout within the new-build elements. The scheme would also benefit from a greater level of articulation and detail within the elevations of the new buildings, and from further clarity and control of the landscaped area in front of the new apartment building.

The design team will need to negotiate a careful balance between heritage requirements and energy efficient design; this should be undertaken in cooperation with Haringey officers. The panel would also welcome greater clarity of intention within the drawings in terms of the technical design of the development, which should include showing elements like air source heat pumps and photovoltaic panels within the drawings. The panel also highlights the importance of producing additional three dimensional (CGI) images to show the detail of all of the new-build elements, and the relationships between the new buildings and the existing buildings.’

The Quality Review Panel was ‘delighted with the way that the scheme has progressed, and it looks forward to seeing the proposals come to fruition. Some comments on the details of the scheme remain, but the panel feels that these can be addressed in consultation with officers’.

4.2 Application Consultation

- 4.2.1 The following were consulted regarding the application:

(Comments are in summary – full comments from consultees are included in appendix 4)

INTERNAL:

Design Officer

Comments provided are in support of the development

Conservation Officer

Comments provided in support of the proposal

Transportation

No objections raised, subject to conditions and relevant obligations

Waste Management

No objections, subject to conditions

Arboricultural Officer

No objection subject to conditions

Inclusive Economy

No objection, Heads of Terms recommended

Flood and Water Management

No objections

Carbon Management

No objections, subject to conditions and S106 legal clause

Pollution

No objection, subject to conditions

EXTERNAL

Thames Water

No objection – informatives recommended

Designing out crime

No objections, subject to conditions

Environment Agency

No comment

Greater London Archaeological Advisory Society (Historic England)

No objection

The Victorian Society

Overall, we do not have any major comments to make on the scheme, but we would caution the treatment of the rear elevations. These appear to include the loss of original windows but are not appropriately outlined or discussed in the heritage statement. The rear elevations, as a whole, are not discussed in terms of the significance of their features and so have neglected to make comment on whether the glazing or doors are original. If these features are original and are to be lost, the significance of the heritage asset will be negatively impacted.

The quality of design for the newly proposed flat blocks, whilst by no means bad, has chosen to prioritise a contemporary appearance. Ultimately, the almshouses are special for their high neo-Gothic design - the polychrome of the London Stock brick with red and black brick dressings creating visually exciting facades - but the contemporary appearance of these new additions falls flat in comparison. Whilst the Society appreciates the applicant's attempts to make these distinct modern interventions, they remain at a suitable distance from the almshouses that a more historicist approach to the new additions would complement rather than detract from the original buildings.

(Conservation Officer Comment: A contemporary approach given their historically incongruous location is considered more appropriate than a historic based one.)

5. LOCAL REPRESENTATIONS

5.1 On January 2023, notification was sent to the following regarding planning application HGY/2022/4319 and Listed Building Consent HGY/2022/4320:

- 254 letters to neighbouring properties
- Site notices erected in the vicinity of the site
- A press notice

5.2 The number of representations received from neighbours, local groups etc have been collated for the planning application and listed building consent application, as follows:

No of individual responses: 33
Objecting: 26
Supporting: 2
Representations: 5

- 5.3 The issues raised that are material to the determination of the application are set out in Appendix 4 and summarised as below. These matters are discussed within the assessment sections of this report.

Land Use and housing

- Overdevelopment/burden on public services (Officer comment: The proposal reduces the number of households on site and is a 'car-free' proposal with only provision for 5 accessible car-parking spaces on site. The proposal is sensitive to the listed buildings and preserves and enhances the open spaces on-site)
- Buildings should not be changed from almshouses. They should remain with the same purpose and not be used for profit. Suggest a planning condition to retain for social housing (Officer comment: The proposal is operated by a registered charity for charitable purposes).
- More 3 bed properties should be provided (Officer comment: The proposal offers new, high quality family housing where there is currently none).
- Change of use should not be permitted (Officer comment: No change of use is proposed).

Impact on Heritage Assets

- Out-of-character - current almshouses are beautiful to look at and proposals would damage the nature of the area. They should be held to the same standards / apartment building is a mis-match.
- Loss of historic windows (Officer Comment: Any replacements would be required to be 'like-for-like in design and materials')

Size, Scale and Design

- Overbearing - The scale of the works means that the proposed residential blocks will have an oppressive impact on surrounding areas/houses
- Landscaping - More opportunities for planting and enhancements should be made
- Proposal lacks detail/visual interest

Impact on neighbours

- Loss of privacy/overlooking
- Loss of daylight/overshadowing to Elsdon Road
- Noise and disturbance
- Odour
- No benefit to community

Parking, Transport and Highways

- Road safety - The development may lead to a significant impact upon road safety
- Increase in traffic/'insurmountable congestion'

- Cycle parking - Lack of cycle parking details

Process

- No satisfactory consultation process

5.4 The following issues raised are not material planning considerations:

- Profit generating development (**Officer Comments:** This is not a material planning consideration)
- Consultation process not adequate / public engagement was poor (**Officer comments:** the applicants undertook their own consultation exercise through a public exhibition. The Council sent out 254 individual letters to surrounding residents informing occupiers of the proposals and site notices were erected around the vicinity of the site and the proposal was also included in the local press)
- Lack of engagement (**Officer comments:** The applicant has provided a statement of community involvement which sets out the engagement that took place. Officers are satisfied that this meets the requirements for an application of this scale)

6 MATERIAL PLANNING CONSIDERATIONS

6.1 Statutory Framework

6.1.2 Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires planning applications to be determined in accordance with policies of the statutory Development Plan unless material considerations indicate otherwise.

6.1.3 The main planning issues raised by the proposed development are:

- Principle of the development
- Affordable Housing and Housing Mix
- Heritage Impact
- Design and appearance
- Residential Quality
- Impact on Neighbouring Amenity
- Parking and Highways
- Sustainability, Energy and Climate Change
- Urban Greening, Trees and Ecology, Biodiversity
- Flood Risk and Drainage
- Air Quality and Land Contamination
- Fire Safety
- Employment
- Equalities
- Conclusion

6.2 Principle of the development

National Policy

- 6.2.1 The National Planning Policy Framework 2024 (hereafter referred to as the NPPF) establishes the overarching principles of the planning system, including the requirement of the system to 'drive and support development' through the local development plan process. It advocates policy that seeks to significantly boost the supply of housing and requires local planning authorities to ensure their Local Plan meets the full, objectively assessed housing needs for market and affordable housing. It also advocates policy that seeks to significantly boost the supply of housing and requires local planning authorities to ensure their Local Plan meets the full, objectively assessed housing needs for market and affordable housing.
- 6.2.2 The National Planning Policy Framework (NPPF) was last updated in December 2024. This version of the National Planning Policy Framework was amended on 7 February 2025 to correct cross-references from footnotes 7 and 8 and amend the end of the first sentence of paragraph 155 to make its intent clear. For the avoidance of doubt the amendment to paragraph 155 is not intended to constitute a change to the policy set out in the Framework as published on 12 December 2024.
- 6.2.3 Paragraph 93 of the NPPF (2024) states that to provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community.

Regional Policy

- 6.2.4 The London Plan (2021) Table 4.1 sets out housing targets for London over the coming decade, setting a 10-year housing target (2019/20 - 2028/29) for Haringey of 15,920, equating to 1,592 dwellings per annum.
- 6.2.5 London Plan Policy H1 'Increasing housing supply' states that boroughs should optimise the potential for housing delivery on all suitable and available brownfield sites, including through the redevelopment of surplus public sector sites.
- 6.2.6 London Plan Policy D6 seeks to optimise the potential of sites, having regard to local context, design principles, public transport accessibility and capacity of existing and future transport services. It emphasises the need for good housing quality which meets relevant standards of accommodation.
- 6.2.7 London Plan Policy S1 states that development proposals that provide high quality, inclusive social infrastructure that addresses a local or strategic need and supports service delivery strategies should be supported. New facilities should be

easily accessible by public transport, cycling and walking and should be encouraged in high streets and town centres.

Local Policy

- 6.2.8 The Haringey Local Plan Strategic Policies DPD (hereafter referred to as Local Plan), 2017, sets out the long-term vision of the development of Haringey by 2026 and sets out the Council's spatial strategy for achieving that vision.
- 6.2.9 Local Plan Policy SP1 states that the Council will maximise the supply of additional housing by supporting development within areas identified as suitable for growth.
- 6.2.10 Local Plan Policy SP2 states that the Council will aim to provide homes to meet Haringey's housing needs and to make the full use of Haringey's capacity for housing by maximising the supply of additional housing to meet and exceed the stated minimum target, including securing the provision of affordable housing. The supporting text to Policy SP2 of the Local Plan specifically acknowledges the role these 'small sites' play towards housing delivery.
- 6.2.11 Local Plan Policy SP16 states that the Council will work with its partners to ensure that appropriate improvement and enhancements, and where possible, protection of community facilities and services are provided for Haringey communities.
- 6.2.12 The Development Management Development Plan Document 2017 (here after referred to as DM DPD) supports proposals that contribute to the delivery of the planning policies referenced above and sets out its own criteria-based policies against which planning applications will be assessed.
- 6.2.13 Policy DM10 of the DM DPD seeks to increase housing supply and seeks to optimise housing capacity on individual sites. The policy states that the council will resist the loss of all existing housing, including affordable housing and specialist forms of accommodation, unless the housing is replaced with at least equivalent new residential floorspace.
- 6.2.14 Policy DM49 of the DM DPD seeks to protect existing social and community facilities, and proposals for new and extended social and community facilities and the sharing of facilities will be supported by the Council provided such schemes meet specific criteria as set out in the DM DPD. As part of preparing a New Local Plan, the Council is currently consulting on a Draft Local Plan under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012, with the consultation running from 10 October to 19 December 2025. Paragraph 48 of the National Planning Policy Framework (NPPF) states that decision makers may give weight to relevant policies in emerging plans according to: (1) the stage of preparation of the emerging plan; (2) the extent to which there

are unresolved objections to relevant policies in the emerging plan; and (3) the degree of consistency of relevant policies to the policies in the Framework. It is recommended that very limited weight be afforded to the Draft Local Plan's policies as the Draft Local Plan is in the early stages of preparation and has not yet been submitted for examination, the policies in the said Plan may be subject to change as objections to the same can still be made, and the relevant policies in the current Plan are consistent with the relevant policies of the NPPF.

6.2.15 As part of preparing a new Local Plan, the Council is currently consulting on a Draft Local Plan under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012, with the consultation period running from 10 October to 19 December 2025. The Draft Local Plan sets out the Council's emerging placemaking framework, spatial strategy, and policy direction. At this stage, the new Local Plan is in the early stages of preparation and has not yet been submitted for examination. In accordance with the National Planning Policy Framework (NPPF), paragraph 49, officers consider that only very limited weight should be afforded to the Draft Local Plan's policies at this time.

5 Year Housing Land Supply

6.2.16 Paragraph 78 of the NPPF requires local authorities to 'identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement... The supply of specific deliverable sites should in addition include a buffer'.

6.2.16 The Council monitors the supply of sites on an annual basis as part of the Authority Monitoring Report (AMR) review process and, according to the latest AMR published in April 2025, as at 31 March 2024 the Council has a housing land supply of 5.18 years.

6.2.17 Overall, the proposal for a residential proposal, expanding the residential offering on site, whilst renewing and upgrading existing housing stock is considered acceptable, being in accordance with the existing use and the policies outlined above.

Affordable Housing

6.2.18 The London Plan (2021) states that all major development of 10 or more homes triggers an affordable housing requirement. The London Plan Policy H4 states that the threshold level of affordable housing on gross residential development is set at a minimum of 35 per cent. Haringey's Local Plan Policy DM13 'Affordable Housing' states that the Council will seek the maximum reasonable amount of affordable housing provision when negotiating on individual private residential and mixed-use schemes with site capacity to accommodate more than 10 dwellings, having regard to Policy SP2 and the achievement of the Borough-wide target of 40% affordable housing provision.

6.2.19 The proposal, whilst providing new-build residential development on site, does not propose any affordable housing. The applicant states that the provision of affordable housing on site would make the proposal unviable.

6.2.20 The Mayor of London's Affordable Housing and Viability (AHV) SPG states that all developments not meeting a 35% affordable housing threshold should be assessed for financial viability through the assessment of an appropriate financial appraisal, with early and late-stage viability reviews applied where appropriate.

6.2.21 The SPG states that plans adopted post-NPPF should be considered viable and negotiations to reduce obligations are only for exceptional cases where site-specific issues create abnormal costs that make policy compliance unviable. Exceptional or abnormal costs may include issues such as high levels of contamination, requirement to divert major utilities, poor ground conditions necessitating special foundations/ground works. However, it should also be noted that the presence of such issues will also impact land value and the cost should not necessarily be borne through a reduction in Planning Obligations.

Affordable Housing - Viability Assessment and Review

6.2.22 The proposal is supported by a viability appraisal (updated July 2025) which demonstrates that affordable housing is not viable on this site. The viability assessment is based on delivering 48 homes within the development, including 27 homes within the existing structures. The viability report also sets out that the development will provide funds to enable the refurbishment works to the listed almshouses and the chapel to be carried out.

6.2.23 The viability appraisal has been reviewed by the Council's independent assessor who found that the proposal, if assessed as 100% private housing, generates a residual land value (RLV) of £5,945,000. Against the site's Existing Use Value (EUV) the proposal generates a significant deficit (- £1.145 million) and as such is considered unviable.

6.2.24 Officers recognise that the cost to upgrade, restore and refurbish a group of listed buildings to secure their long-term future would be significant. Given the independent viability assessment (revised/updated since the submission of the original application), officers accept, on this occasion, that the inclusion of affordable housing within the proposal would make the scheme undeliverable.

6.2.25 Given the existing poor state of repair of the listed buildings, the existing sub-standard accommodation and given that the site is currently vacant, the desire to see investment, sympathetic development, and a scheme that delivers new homes to modern standards the site being brought back into beneficial use, is supported by officers.

Affordable Housing – The Status of Alms Housing

- 6.2.26 The conclusion of the viability assessment is based on the existing site being assessed as ‘private housing’. Should the existing site be considered ‘affordable housing’ then the outcome of the viability assessment differs, as the Existing Use Value (EUV) would differ. Should the site be assessed as ‘affordable housing’ then a surplus profit could be generated and the scheme as proposed could be capable of supporting affordable housing,
- 6.2.27 The outcome of the viability depends on whether the existing vacant homes are considered ‘affordable housing’ in contemporary planning policy terms or if the site is ‘private housing’.
- 6.2.28 The owners of the site; the Drapers’ Company, is a philanthropic enterprise, originally established to regulate the trading of woollen cloth in the medieval City of London but today is responsible for charitable and philanthropic activities. The Drapers’ Company operates as a charity.
- 6.2.29 Built circa 1863, the alms houses were established with the purpose of providing housing accommodation for persons who were in need and resident in the area of benefit (defined as Greater London). It has been the practice of the charity to use its assets and the income generated to provide housing accommodation to people in need.
- 6.2.30 The National Planning Policy Framework (NPPF) outlines the definition of ‘affordable housing’ and its various forms in the context of planning policy. Affordable housing is defined as:

‘Housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers); and which complies with one or more of the following definitions’:

a) **Social Rent:** *meets all of the following conditions:* (a) the rent is set in accordance with the Government’s rent policy for Social Rent; (b) the landlord is a registered provider; and (c) it includes provisions to remain at an affordable price for future eligible households, or for the subsidy to be recycled for alternative affordable housing provision.

The rent in this case is not set in accordance with the Government’s rent policy for social rent and the landlord is not a registered provider; so the existing housing does not constitute affordable housing under this criteria.

b) **Other affordable housing for rent:** *meets all of the following conditions:* (a) the rent is set in accordance with the Government’s rent policy for Affordable Rent, or is at least 20% below local market rents (including service charges where

applicable); (b) the landlord is a registered provider, except where it is included as part of a Build to Rent scheme (in which case the landlord need not be a registered provider); and (c) it includes provisions to remain at an affordable price for future eligible households, or for the subsidy to be recycled for alternative affordable housing provision. For Build to Rent schemes affordable housing for rent is expected to be the normal form of affordable housing provision (and, in this context, is known as Affordable Private Rent).

The landlord is not a registered provider, and the new homes could be rented or sold. Typically the rent has been at least 20% lower than local market rates (including service charges); however this was because of the size of the accommodation so the existing housing does not constitute affordable housing under this criteria.

c) Discounted market sales housing: is that sold at a discount of at least 20% below local market value. Eligibility is determined with regard to local incomes and local house prices. Provisions should be in place to ensure housing remains at a discount for future eligible households.

The existing homes are rental properties, so the existing housing does not constitute affordable housing under this criteria.

d) Other affordable routes to home ownership: is housing provided for sale that provides a route to ownership for those who could not achieve home ownership through the market. It includes shared ownership, relevant equity loans, other low-cost homes for sale (at a price equivalent to at least 20% below local market value) and rent to buy (which includes a period of intermediate rent). Where public grant funding is provided, there should be provisions for the homes to remain at an affordable price for future eligible households, or for any receipts to be recycled for alternative affordable housing provision or refunded to Government or the relevant authority specified in the funding agreement.

The existing homes are rental properties, there is no route towards home ownership, so the existing housing does not constitute affordable housing under this criteria.

6.2.31 As such, whilst these alms houses have provided a form of reduced-cost housing, given that this property is owned and operated as a charity, for charitable purposes, officers consider that this is 'charitable housing' and does not meet the planning policy definition of 'affordable housing' and therefore the Existing Use Value (EUV) which the Benchmark Land Value (BLV) is based on, assumes private housing rather than affordable housing. The Drapers' Company clarify that whilst the objective of the charity is to provide accommodation for people in need (below market-rent housing), there is no restriction on the charity renting the properties at full market-rent, effectively operating them as 'private housing' at any time. Officers agree, that given the age of the properties, there are no planning controls

restricting the status of the alms-houses to 'reduced-cost' housing and that the owner (trustee) is free to let the existing homes at full market rents or to sell the properties at full market value. In terms of their charitable status the Drapers would then need to use the proceeds to meet their charitable purposes. However, this is a matter governed by the charity legislation, distinct from planning legislation.

6.3.32 The alms houses at Edmansons Close, built in the mid-nineteenth century by a private, charitable organisation do not meet the criteria outlined above in the NPPF 2024 and as such is not considered 'affordable housing' in contemporary planning policy terms for the purposes of the site's existing use.

6.3.33 As such, the result of the independent viability assessment, based on a scenario of all 'private housing' shows that the provision of affordable housing as outlined in the NPPF definition would make the proposed planning application unviable. Officers accept this position and as such, in this scenario, affordable housing is not required as a condition of any planning permission.

Alm-Houses Rents

6.3.34 The submitted viability appraisal (revised 2025) outlines market rents for the local area. Officers have compared these with the rents charged by the Drapers Company for the most recent occupants. Table 1 below illustrates the weekly market rent for studios, 1 bed and 2 bed apartments capped as Local Housing Allowance levels (LHA). LHA levels vary by location, as they are set for different Broad Rental Market Areas (BRMAs) and are based on the number of bedrooms required for a household.

6.3.35 Table 2 compares 2022/23 weekly rents achieved for studios, 1 bed and 2 bed apartments within the property to 80% of the market rent (weekly). The 80% of market rent threshold relates to the Government's rent policy for 'Affordable Rent' set at least 20% below local market rents (including service charges where applicable).

The alms-houses rents for 2022/23 were as follows:

- Average studio unit rent of £419 per month plus service charge of £105 per month giving a total charge of £524 per month or £131 per week
- Average one bed rent of £489 per month plus service charge of £105 per month giving a total charge of £594 per month or £148.50 per week (approx.)
- Average two bed rent of £552 per month plus service charge of £105 per month giving a total charge of £657 per month or £164.25 per week (approx.)

6.3.36 The table and commentary above illustrate that the rents charged by the Drapers Company in 2022/23 are significantly below, both the weekly market rent and the 80% of market rent figures for studios and 1-2 bedroom flats. However, it should be noted that whilst the alms houses rents were significantly less expensive than

‘affordable rents’ in 2022/23, the quality of the homes were also significantly below policy standards. The London Plan (2021) states that 1 person studio apartments should be a minimum of 39sqm. Many of the studio apartments are approximately 29sqm, significantly below the London Plan minimum standard (comprising only 74% of the minimum standard). The site is currently made up of 78.69% studios and therefore, the existing development as a whole, offers sub-standard homes in terms of floorspace in relation to contemporary policy standards.

Table 1

Comparison of rents				
Unit Type	Market Rent p/wk	80% Market Rent	LHA (outer north London BRMA)	Rent used in appraisal p/wk
Studio apartment	£300	£240	£264.66	£240.00
1 bed apartment	£335	£268	£264.66	£264.66
2 bed apartment	£425	£340	£322.19	£322.19
2 bed house	£500	£400	£322.19	£322.19

(Source: WSP, GL Hearn – July 2025)

Table 2

Unit Type	Rent p/wk	80% Market Rent	Rent p/wk difference
Studio apartment	£131	£240	- £108.75
1 bed apartment	£148.50	£268	-£119.5
2 bed apartment	£164.25	£340	-£175.75

Grants and Subsidy

6.3.34 All schemes are expected to determine whether grants and other forms of subsidy are available and to make the most efficient use of this to increase the provision

or level of affordable housing delivered. All applicants are expected to work with the LPA, the Mayor, and Registered Providers (RPs) to ensure affordable housing from all sources is maximised.

6.3.35 The applicant, on the advice of officers, explored opportunities to secure grants with a view to closing the viability gap, thus enabling some affordable housing to be provided on site. The Greater London Authority was consulted on the planning application and concluded that the site does not meet the eligibility criteria for funding for the following reasons:

- given their age, all the listed almshouses do not meet the minimum housing size requirements and the heritage constraints mean they cannot be adapted to be suitable for affordable housing
- the new build elements of the scheme are not alone sufficient to meet the minimum 35% affordable housing requirement and these are unable to provide the required mix which would be needed to support affordable housing, particularly the studio units
- the costs of repairs and alterations to listed buildings are high, making the viability challenging as listed buildings incur higher maintenance costs. The properties are not suitable for affordable housing which is required to provide low maintenance costs
- a housing grant, if awarded, would not make up the reduction in the value incurred from changing the tenure from a private unit to affordable homes

6.3.36 In addition, the Government, as part of its consultation on the revised National Planning Policy Framework (NPPF) in 2024 consulted on the definition of 'community-led development'. Some respondents suggested that alms houses should be included in this definition which would mean they may be able to benefit from extra sources of funding, including related to affordable housing. In December the Government responded to the consultation and said 'Having carefully considered responses, Government will not extend the definition to capture alms houses. While alms houses make a valuable contribution to the provision of affordable housing for those in particular need, the alms house model differs fundamentally from community-led housing. Developments are taken forward by the board of an alms house charity rather than by the prospective residents, and the residents are not automatically entitled to become voting members of the body that controls the homes'.

6.3.37 Officers are satisfied that the applicant has explored relevant potential funding streams and accepts that the site is ineligible. Officers conclude that the scheme is not suitable for housing grants and in any case, grants would not significantly improve the overall viability position.

6.3.38 Officers are conscious that market conditions are changeable, thus impacting values, costs and ultimately viability. As such an early and late-stage viability review mechanisms can be secured by legal agreement in order to capture any

uplift in values, including close to completion of the homes. Early and late-stage reviews are mechanisms to re-evaluate a development's financial viability after planning permission is granted, ensuring affordable housing contributions are captured if a project becomes more profitable than initially assessed. They are triggered by factors like a developer's failure to start the project within a certain timeframe (early) or the completion of a significant portion of homes (late). The 'affordability' aspect comes into play because these reviews can lead to financial payments to the Local Planning Authority towards off site provision of affordable homes, more affordable housing on site, or both, if the scheme is more successful than the original viability assessment predicted. This allows officers to re-assess the viability of the proposal should market conditions change. Should a shift in market conditions improve the viability of affordable housing on the site, then officers have the right to re-evaluate the proposal and secure affordable housing provision, if viable.

- 6.3.39 In addition, the applicant has also agreed to a mechanism whereby no more than 50% of the homes can be occupied until the restoration works to the Grade II listed Chapel are completed. The proposal therefore would be acceptable in this instance.

Overall Housing Mix and Reduction in homes

- 6.3.40 London Plan (2021) Policy H10 states that schemes should generally consist of a range of home sizes. To determine the appropriate mix of home sizes in relation to the number of bedrooms for a scheme, it advises that regard is made to several factors. These include robust evidence of local need, the requirement to deliver mixed and inclusive neighbourhoods, the nature and location of the site (with a higher proportion of one and two bed homes generally more appropriate in locations which are closer to a town centre or station or with higher public transport access and connectivity), and the aim to optimise housing potential on sites.

- 6.3.41 The London Plan (2021) states that boroughs may wish to prioritise meeting the most urgent needs earlier in the plan period, which may mean prioritising low cost rented homes of particular sizes.

- 6.3.42 Policy DM11 of the DM DPD states that the Council will not support proposals which result in an over concentration of 1 or 2 bed homes overall unless they are part of larger developments or located within neighbourhoods where such provision would deliver a better mix of home sizes.

- 6.3.43 The existing mix of housing within the proposed development is as follows:

Homes Existing		
No of beds	No of homes	%

Studios	48	78.69
1	1	1.639
2	12	19.67
3	0	0
Total	61	100%

6.3.44 The overall mix of housing as percentage proposed development is as follows:

Homes Proposed		
No of beds	No of homes	%
Studios	7	14.58
1	17	35.42
2	18	37.5
3	6	12.5
Total	48	100%

6.3.45 The proposed housing split between refurbished structures and new-build is as follows:

Refurbishment		
Home type	No of Beds	Total homes
1	1-bed	8
2	2 bed	12
3	3 bed	6
4 (Gatehouse)	2 Bed	1
Total		27
New-build		
Apartments	Studios	7
Apartments	1 bed	9
Infill (new house)	2 Bed	1
Pavilions x 2	2 bed	4
Total		21
Overall Total		48

6.3.46 Proposed Floorspace (sqm) for each housing typology.

	Existing Structures
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House Type	No.	Beds/Storeys	Proposed Floorspace	London Plan Standards	Compliance
Single House (Type 1)	8	1bed/2 storey	47.7	58	No
Amalgamated houses – no extension (Type 2)	12	2 bed/2 storey	97.4	79	Yes
Amalgamated houses + new rear extension (Type 3)	6	3bed /2 storey	123.3	93	Yes
Gatehouse (Type 4)	1	2 bed / 2 storeys	84.8	79	Yes
New-build					
New house (Type 5)	1	2 bed /2 storey	104.3	79	Yes
Pavilions	4	2 bed	66.7-69	61	Yes
Apartment Block (Studios)	7	Studio	37-37.5	37	Yes
Apartment Block (1 beds)	9	1 bed	50	50	Yes

6.3.47 Of the 44 existing homes, 8 homes would be returned to their original layout; 24 homes would be adapted to create 12 x 2 bed houses with each combining 2 of the existing homes, and 12 homes would be adapted to create 6 x 3 bed houses with each combining 2 of the original homes and adding modest two-storey, rear extensions. The overall proposal, when comparing the existing quantity of homes to the proposed quantity, would result in a net loss of 13 homes.

6.3.48 Whilst the proposal would result in a net loss of homes, the overall residential floorspace would increase by 1,451.70sqm (a 50.83% increase on the current floorspace). This increase not only allows for entirely new homes to be provided but also for the floorspace of 6 existing properties to be increased to meet modern day space standards. This would provide a better mix of home sizes and provide larger homes, with the existing housing configuration not meeting current space standards.

6.3.49 The reduction in the number of homes is largely due to the reconfiguration of the existing homes which have previously been sub-divided into smaller homes, resulting in almost half (48%) of the site being studio flats; the smallest type of permissible homes and the least desirable within this part of the borough. These studios are significantly below contemporary London Plan space standards, with many only 29.2sqm gross internal area (GIA). As such, the existing homes provide sub-standard accommodation which would not be permissible today. The minimum GIA for a studio flat within The London Plan is 37sqm, significantly more than the existing homes. The proposal offers the opportunity to reconfigure some homes to modern-day space standards, whilst returning others to their original configuration (two-storey terraced houses). All new-build homes would meet contemporary standards

New Family Housing

6.3.50 In addition, the east of the borough is a designated 'Family Housing Zone', due to previous house conversions into flats which have increased pressure for family-sized homes (3 bedrooms) of which none are currently provided on site. The scheme, however, proposes 6x3 bed homes suitable for family use.

6.3.51 The proposed development would reduce the number of studio homes from the current 78.7% of homes (48 dwellings) to 14.6% of homes (7 dwellings). There would be a substantial increase in 1 bed and 2 bed homes on the site, as well as the 6 new, family sized homes (3 beds). The majority (all but 8) of new or reconfigured homes would meet or exceed minimum floorspace standards outlined in The London Plan (2021).

6.3.52 Properties exceeding required space standards include the amalgamated houses (no extension) which would be 97.4sqm, significantly above the 79 sqm required for a 2 bed/2 storey home. The amalgamated houses (with new rear extensions) would be 123.3sqm, 30sqm above the 93sqm required for a 3bed /2 storey house. In addition, the proposed new house would be 104.3smq which is above the 79sqm required for 2 bed /2 storey homes and the proposed 'pavilions' would contain 66.7-69sqm homes, above the 61sqm required for 2-bedroom homes. Lastly, the proposed 1-bedroom homes and new-build studio apartments would meet, the London Plan space standards.

6.3.53 The exception are eight previously converted homes (flats) which will return to their original floorspace of 47.7sqm. Whilst this is below the current London Plan standard for 1bed/2 storey homes (58sqm), this is the original 1860s floorspace and therefore is a restoration of historic floorplans. As such, this shortfall is considered acceptable in this instance.

6.3.54 Officers consider that the scheme provides a good mix of homes which would deliver a range of home sizes and introduces family housing to meet local housing requirements. The net reduction in homes is considered acceptable given the significant overall increase in residential floorspace, the higher quality of each living space, as well as the restoration of the original floorspace to homes.

6.3.55 As such, it is considered that the proposed tenure, mix and quality of housing provided within this proposed development and location is acceptable, and in general accordance with the development plan.

6.4 Heritage Impact

Policy Context

6.4.1 Paragraph 194 of the NPPF states that in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting.

6.4.2 Paragraph 202 of the NPPF states that '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'.

6.4.3 Policy HC1 of the London Plan seeks to ensure that development proposals affecting heritage assets and their settings, should conserve their significance. This policy applies to designated and non-designated heritage assets. Policy SP12 of the Local Plan and Policy DM9 of the DM DPD set out the Council's approach to the management, conservation and enhancement of the Borough's historic environment, including the requirement to conserve the historic significance of Haringey's heritage assets and their settings.

6.4.4 Policy DM9 of the DM DPD further states that proposals affecting a designated or non-designated heritage asset will be assessed against the significance of the asset and its setting, and the impact of the proposals on that significance; setting out a range of issues which will be taken into account.

Legal Context

6.4.5 The property is located within the Bruce Castle and All Hallows Conservation Area. There is a legal requirement for the protection of conservation areas. The

legal position on the impact on these heritage assets is as follows, Section 72(1) of the Listed Buildings and Conservation Areas Act 1990 provides: 'In the exercise, with respect to any buildings or other land in a conservation area, of any functions under or by virtue of any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.' Among the provisions referred to in subsection (2) are 'the planning Acts'"

- 6.4.6 Section 66 of the Act contains a general duty as respects listed buildings in exercise of planning functions. Section 66 (1) provides: 'In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.'
- 6.4.7 The Barnwell Manor Wind Farm Energy Limited v East Northamptonshire District Council case states that 'Parliament in enacting section 66(1) intended that the desirability of preserving listed buildings should not simply be given careful consideration by the decision-maker for the purpose of deciding whether there would be some harm, but should be given 'considerable importance and weight' when the decision-maker carries out the balancing exercise.'
- 6.4.8 The judgment in the case of the Queen (on the application of The Forge Field Society) v Sevenoaks District Council says that the duties in Sections 66 and 72 of the Listed Buildings Act do not allow a Local Planning Authority to treat the desirability of preserving listed buildings and the character and appearance of conservation areas as mere material considerations to which it can simply attach such weight as it sees fit. If there was any doubt about this before the decision in Barnwell, it has now been firmly dispelled. When an authority finds that a proposed development would harm the setting of a listed building or the character or appearance of a conservation area or a Historic Park, it must give that harm considerable importance and weight.
- 6.4.9 An authority's assessment of likely harm to the setting of a listed building or to a conservation area remains a matter for its own planning judgment but subject to giving such harm the appropriate level of weight and consideration. As the Court of Appeal emphasised in Barnwell, a finding of harm to the setting of a listed building or to a conservation area gives rise to a strong presumption against planning permission being granted. The presumption is a statutory one, but it is not irrebuttable. It can be outweighed by material considerations powerful enough to do so. An authority can only properly strike the balance between harm to a heritage asset on the one hand and planning benefits on the other, if it is conscious of the strong statutory presumption in favour of preservation and if it demonstrably applies that presumption to the proposal it is considering.

6.4.10 In short, there is a requirement that the impact of the proposal on the heritage assets be very carefully considered, that is to say that any harm or benefit needs to be assessed individually in order to assess and come to a conclusion on the overall heritage position. If the overall heritage assessment concludes that the proposal is harmful then that should be given 'considerable importance and weight' in the final balancing exercise having regard to other material considerations which would need to carry greater weight in order to prevail.

6.4.11 The Council's Conservation Officer has reviewed the proposal and its impact on heritage assets and notes that the Drapers Almshouses (Nos 1-61 Edmansons Close), its associated Chapel and Gatehouse (Lodge) form a group and are Grade II listed buildings. The site lies within the Bruce Castle and All Hallows Conservation Area and to the rear is the Grade II listed Tottenham Magistrates Court.

Listed Buildings

6.4.12 The Conservation Officer advises that the property is formed of a group of five buildings centred around three sides of a central green (quadrangle) with two short wings along the street. The chapel forms the focal point, facing onto the middle of green, with the gatehouse set slightly apart from the main group to the south-west along Edmonson Close. The almshouses date from 1868-9 and were designed by Herbert Williams for the Drapers Company which replaced three of their original lost almshouses. The almshouses are two-storeys designed in High Victorian Gothic style with polychromatic brickwork. The main buildings are formed of London Stock brick with red and black brick dressings and detailing and some stonework. The front facades have highly detailed gabled dormers and porches.

6.4.13 The chapel is taller than the houses and has a stone portico with gothic arched window which sits under an angled fleche, which gives the communal building prominence. To the rear, the elevations are simpler with no ornamentation as these would not be seen by the public or visitors; however, these retain their original openings and windows. The external appearance of the almshouses, their composition, design and consistency and retention of original features, contribute to their aesthetic value.

Internal Alterations

6.4.14 Internally the existing buildings have been significantly altered, with significant floor plan alterations occurring in the mid-late C20, when the cottages were altered into their current layout.

6.4.15 The composition and design of the buildings also contribute to the buildings' illustrative historic value as a type of almshouse associated with Victorian philanthropy. The prominent chapel, plan form and architectural detailing are

important characteristics of almshouses and, in addition to their architectural interest, also demonstrate historic qualities, such as the projection of piety and corporate status. The historic association with the Drapers Company, and with the company's Herbert Williams who also designed the Drapers Court and the Drapers' College (later High Cross School) in Tottenham High Road also contributes to the buildings' significance.

Conservation Area

- 6.4.16 The Bruce Castle and All Hallows Conservation Area is defined by its historic buildings and their relationship to their respective historically significant open spaces, contrasting the surrounding later residential development. Alongside Bruce Castle and All Hallows Church, the Drapers Almshouses form one of the three important historic open spaces which survive in the Conservation Area, with the almshouses forming an important landmark. The group of buildings form an important part of the character and appearance of this part of the conservation area, and positively contribute to its significance. There is a Conservation Area Appraisal and Management Plan (2019) for Bruce Castle and All Hallows Conservation Area.

Surrounding Heritage Assets

- 6.4.17 The other heritage asset which the development site lies within its setting is the adjacent Grade II Listed Tottenham Magistrates Court. The building is a well surviving suburban police court from 1937, associated with the noted W.T.Curtis. The building's interest primarily lies within its architectural design; however, it also has links to the almshouses, as it was built on the site of a girl's orphanage formerly supported by the Drapers Company.

Unsympathetic additions

- 6.4.18 Whilst the site has significant heritage value, the character, whilst largely intact, has been eroded by unsympathetic additions, namely the two-storey residential infill development fronting Bruce Grove, a single storey laundry building to the rear of the almshouses and single storey additions to the rear of the chapel. Each are considered to detract from the character and appearance of the listed buildings and the wider conservation area.
- 6.4.19 The Conservation Officer advises that the proposed design has benefitted from extensive pre-application discussion and formal design reviews that have sought to address both the heritage sensitivity of the development site and the opportunity to manage change within the heritage setting through informed and sensitive design. The application has been amended since the original submission. These amendments are discussed below within each element of the proposal.

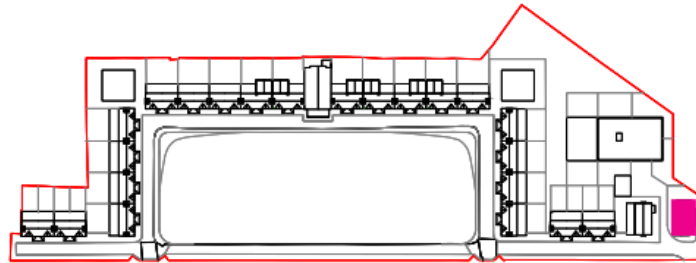
Alms Houses & Gatehouse

6.4.20 The Conservation Officer advises that the almshouses were heavily altered internally in the 1970s, converting the cottages into flats. As such, the internal alterations proposed would affect more modern building fabric than historic interiors. Some of the proposals (blocks 1 and 5 and the gatehouse), would restore the original cottage footprint whilst the remainder of the proposals include incorporating 2 original homes into one house.

6.4.21 The reconfiguration of the almshouses proposes changes to the original, although less prominent and less ornamented rear façade, with changes to ground floor fenestration and the inclusion of 6 x two-storey extensions, which would allow the size of the homes to be increased and 6 family-sized homes (3 beds) to be provided where there are currently none.

6.4.21 With the demolition of the existing residential infill development facing Bruce Grove, the gatehouse would be returned to its original, detached state, with a small change to the rear doorway proposed. The original north façade of the gatehouse would be revealed and restored to its original state.

Fig 3 - The Gatehouse



6.4.22 The Conservation Officer states that whilst the proposals would require partial demolition to the likely original rear walls and lean-tos, given that the original floor plan has been lost, this is likely to cause a limited amount of harm to the significance of the listed buildings.

6.4.23 The Conservation Officer advises that as part of the application process there has been a considerable development of the design. The changes in the design to the almshouses consist of:

- Revision of the rear elevations to accommodate the retention of the original windows to the ground floor and the original rhythm of the rear elevations
- Associated minor alterations to the ground floor layouts
- Associated lower extent of demolition

6.4.24 The amendments have alleviated the previously raised concerns that the rear demolitions would cause harm to the significance of the listed buildings and these amendments are welcomed and in line with the officers' recommendations.

6.4.25 Whilst the condition survey and more detailed heritage statement demonstrate that the interior of the buildings have undergone a considerable redevelopment in the late C20, there are also a lot of modern finishes which, although unlikely, may be overlaid on top of more historic fabric. It is recommended that a contingency condition is attached to the listed building consent so that if any historic fabric is uncovered it can be appropriately accommodated within the design.

6.4.26 As the buildings will undergo a large permanent change including areas of demolition and subdivision it is recommended that a level 1 building recording is undertaken in line with best practice and NPPF paragraph which states:

‘Local planning authorities should require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible. However, the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted.’

6.4.27 Given the Grade II status of the building, and the demonstrated condition of the interior of the building a level 1 recording, as set out in Historic England’s: Understanding Historic Buildings: A Guide to Good Recording Practice, should be sought. A condition for a written scheme of investigation is recommended. Officers have added the condition accordingly.

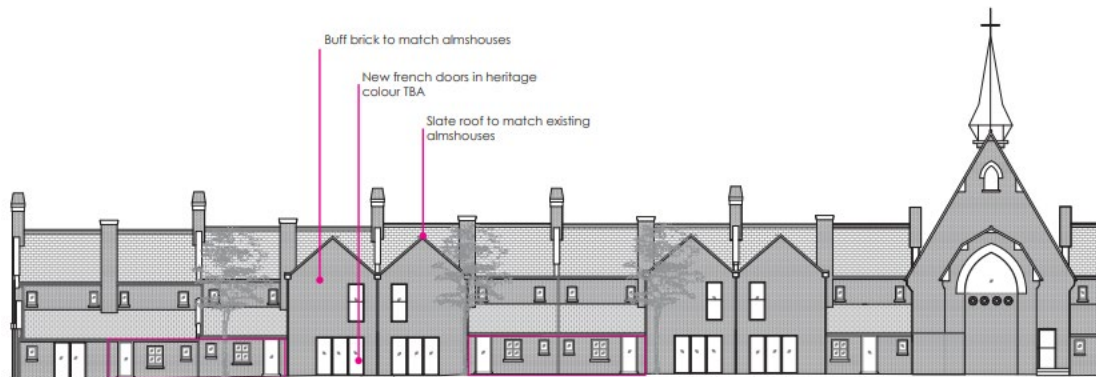
6.4.28 Officers recognise that whilst, less prominent and ornamental, the rear façade of the almshouses still contribute to the significance of the heritage assets. Revisions have allowed a greater level of the original façade to be retained whilst also allowing the site to increase the standard and tenure of homes offered on site. The changes to the rear façade when weighed against the benefit of higher quality homes, new family homes as well as overall investment in the listed building, which are currently vacant, is considered justifiable in this instance, providing significant public benefit.

6.4.29 Officers also note that the proposed two storey rear extensions are sympathetic in their design, being gable-roofed in materials to match the existing. The extensions would sit below the ridge line of the existing cottages and as such will not be visible from the front of the properties. The most significant views of the almshouses, from the front, will remain unaltered and as such this aspect of the proposal is considered acceptable.

Figure 4 – Proposed demolition

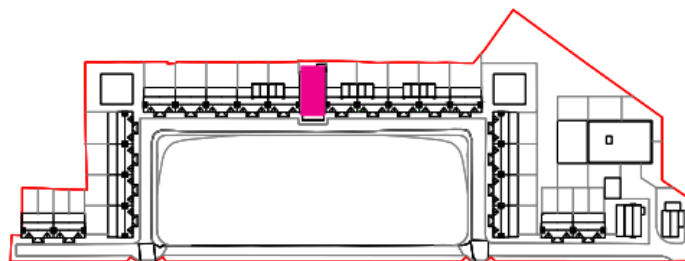


Figure 5 – Proposed rear elevation (amended)



Chapel

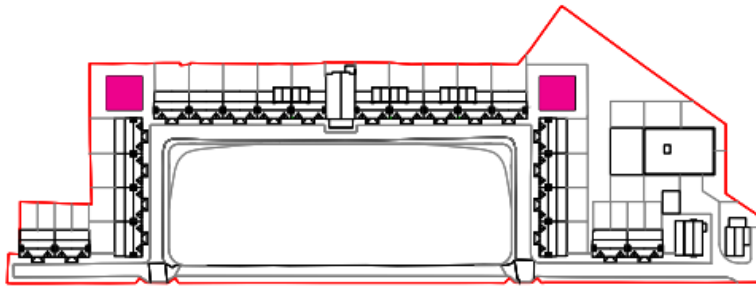
6.4.30 The Conservation Officer advises that the works proposed to the chapel include the demolition of the rear, single storey additions, the replacement in part with an accessible WC and a new staircase to the mezzanine. The replacement of the existing single storey buildings, and their replacement with a much smaller building, housing a WC, is considered to have a minor beneficial impact in the significance of the listed building as it would reveal slightly more of the chapel's exterior. The chapel will be refurbished with no further changes proposed.



6.4.31 Internally the works included in the plans appear relatively minimal, the installation of a new staircase would not cause harm to the significance of the listed building, subject to detailed design.

Pavilions

6.4.32 These two proposed new buildings are located in the underused corners formed by the terraces and are modest in size, simple in design and subservient to the more ornate almshouses. Proportions of windows match those of the almshouses and a simple head jointed brick banding takes precedent from the brick banding of the almshouses. There will be short glimpses of the buildings from around the site. The architecture is modest and will be built in brick to match the historic buildings with generous inset balconies placed to get the best views of the surrounding landscape.



6.4.33 The Conservation Officer states that the scale and massing of the proposed pavilions and the new flat block have been refined and demonstrate that they would not have an overbearing impact on the almshouses. The flat blocks, whilst visible from within the square, have been set back so they would not be prominent features and the block's size has been reduced so that it is not visible above the ridgeline of the almshouses.

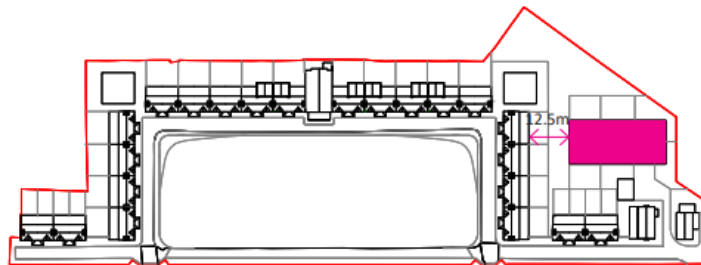
6.4.34 The design of the proposed flat-roofed blocks has taken a contemporary approach, allowing the buildings to be read as modern interventions rather than a pastiche of the original Victorian architecture. The design of the buildings, is not considered overbearing, reading as subservient to the original structure. Materials and detail quality can be ensured through condition.



Figure 5 – 'Pavilion' extension when viewed from quadrangle.

Apartment Building

6.4.35 On the site of the existing 1970s laundry building, a new apartment block is proposed. At 2-3 storeys, the freestanding block would be larger than the proposed pavilions and would continue the simple and contemporary design aesthetic. Again, the concept is a subservient form of architecture designed to complement, rather than emulate the original Victorian Architecture of the existing structures.

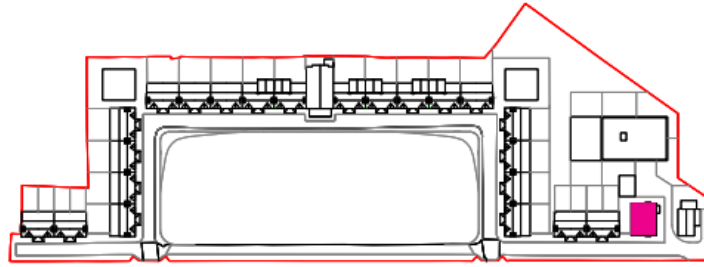


6.4.36 The Conservation Officer states that the scale and massing of the proposed apartment block has been refined and as with the proposed pavilions has demonstrated that it would not have an overbearing impact on the almshouses. The apartments would have limited visibility from the street, being located behind the almshouses and set back from their rear facades. The Conservation Officer states that the block would not be a prominent feature and would not be visible above the ridgeline of the almshouses.

6.4.37 The building would be positioned further away from the almshouses and finished in materials to match both the almshouses and proposed pavilions. The building would step down in height from three to two storeys towards the almshouses and is not visible from any part of the main quadrangle. The entrance would be visible from Bruce Grove and this would improve wayfinding.

New House

6.4.38 An entirely new, additional home, replicating the design of the almshouses, is proposed on the site of the existing 1970's residential infill development. The previous infill development is perhaps the most significant and most prominent detractor to the listed buildings and the conservation area, in particular the gatehouse which abuts the block.



6.4.39 The demolition of the block is welcomed and the more sympathetic, two storey, pitched roof design considered more in keeping with the historic context. Whilst one dwelling, the proposal has been designed to resemble two dwellings, following the modest rhythm of the alms houses which read as single terraced houses. This would be achieved with architectural details such as coping to the roofslope and chimneys to each side of the house. Whilst contemporary in appearance, the scale and massing matches that of the original almshouses, ensuring a respectful relationship between the two.



Figure 6 – Outline of proposed new-build development behind existing almshouses

Servicing, Retrofitting & Renewables

6.4.40 As part of the development of the sustainability statement during the application process, more works to retrofit the listed buildings and a deeper retrofit of the listed buildings is now envisioned. This will now include:

- Secondary glazing to original windows
- Internal wall insulation
- Loft insulation
- Under floor insulation
- Air Source Heat Pumps (ASHP) to most homes
- Solar panels and ASHPs proposed to the flat blocks have been refined to alter the number and location of these units, and to ensure they are not visible from the ground

6.4.41 The Conservation Officer states that there is a need to balance increasing the energy efficiency of the listed building against causing harm to the listed building. This is supported in Historic England's Document 'Historic Alms Houses – A Guide to Managing Change', which states that 'Comfort is an important contributor to the quality of life of residents in an almshouse and energy improvements therefore an important requirement. In the light of the Government's declaration of a climate emergency, and the need for residential buildings to be more energy efficient, a more sustainable approach is needed for the improvement of their energy and carbon performance'. The document continues, stating that 'Almshouses will need to comply with the domestic minimum energy efficiency standards (MEES) where the property is let domestically'. Conservation and Sustainability officers have carefully developed the sustainability strategy with the applicant, and these measures have been carefully considered as in principle the best way to balance both the heritage and energy efficiency aspects of the proposal.

6.4.42 The detailed design of these interventions will need to carefully take into account the significance of the listed buildings as well as technical considerations to ensure the long-term condition of the listed buildings. This will need to be controlled through the detailed design stage which can be accommodated through a set of conditions. Conditions have been recommended accordingly.

Conclusion on Heritage Impact

6.4.43 The Conservation Officer has advised that the harm would be 'less than substantial', (making Paragraph 202 of the NPPF relevant), and concludes that the proposed scheme is acceptable from a conservation perspective as it will lead to a very low, less than substantial harm to the significance of the conservation area and its assets. Officers consider this low level of harm would be outweighed

by the public benefits of the proposed development, namely repairing the listed chapel, alms houses, gatehouse, the removal of unsympathetic structures including the existing laundry, 1970s infill development, chapel rear boiler room extension and the reconfiguration and upgrading to the quality of the accommodation which currently falls well below London Plan space standards (See housing section). In addition, upgrades to energy efficiency, the landscape setting and the removal of car parking (excluding 5 accessible bays) will significantly enhance the lifespan of the listed building as well as enhancing the wider conservation area.

6.4.44 Conditions have been imposed on any planning permission granted requiring further details of the design, material specification and method statements related to demolition, repair works to the listed buildings to ensure that the character and appearance of the conservation area are effectively enhanced.

6.4.45 Given the above and the support from the Design Officer and the Quality Review Panel, the proposed development in conservation and heritage terms is therefore acceptable.

6.5 Design and Appearance

National Policy

6.5.1 Chapter 12 of the NPPF (2024) states that 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.

6.5.2 Chapter 12 also states that, amongst other things, planning decisions should ensure that developments function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development and be visually attractive due to good architecture, layouts, and appropriate and effective landscaping.

Regional Policy – London Plan

6.5.3 The London Plan (2021) policies emphasise the importance of high-quality design and seek to optimise site capacity through a design-led approach. Policy D4 of the London Plan notes the importance of scrutiny of good design by borough planning, urban design, and conservation officers (where relevant). It emphasises the use of the design review process to assess and inform design options early in the planning process (as has taken place here).

6.5.4 Policy D6 of the London Plan seeks to ensure high housing quality and standards and notes the need for greater scrutiny of the physical internal and external building spaces and surroundings as the density of schemes increase due the

increased pressures that arise. It includes qualitative measures such as minimum housing standards.

Local Policy

- 6.5.5 Policy SP11 of the Haringey Local Plan requires that all new development should enhance and enrich Haringey's built environment and create places and buildings that are high quality, attractive, sustainable, safe and easy to use.
- 6.5.6 Policy DM1 of the DM DPD requires development proposals to meet a range of criteria having regard to several considerations including building heights; forms, the scale and massing prevailing around the site; the urban grain; and a sense of enclosure. It requires all new development to achieve a high standard of design and contribute to the distinctive character and amenity of the local area.
- 6.5.7 Policy DM6 of the DM DPD expects all development proposals to include heights of an appropriate scale, responding positively to local context and achieving a high standard of design in accordance with Policy DM1 of the DM DPD. For buildings projecting above the prevailing height of the surrounding area it will be necessary to justify them in urban design terms, including being of a high design quality.

Assessment

Quality Review Panel (QRP) Comments:

- 6.5.8 The Quality Review Panel (QRP) has assessed the scheme in full at pre-application stage on three occasions. The panel, on the whole supported the scheme.
- 6.5.9 The full and most recent Quality Review Panel (QRP) report is attached in Appendix 5. The Quality Review Panel's summary of comments is provided below;

The panel 'supports the scale of the proposals, the refurbishment of the chapel, the extension of the almshouses and the adjustments to the infill building on Bruce Grove.

However, there are still some aspects of the proposals that would benefit from some further consideration. These include the arrangements for cycle parking, the entrance sequences, and circulation layout within the new-build elements. The scheme would also benefit from a greater level of articulation and detail within the elevations of the new buildings, and from further clarity and control of the landscaped area in front of the new apartment building.

The design team will need to negotiate a careful balance between heritage requirements and energy efficient design; this should be undertaken in cooperation with Haringey officers. The panel would also welcome greater clarity of intention within the drawings in terms of the technical design of the development, which should include showing elements like air source heat pumps and photovoltaic panels within the drawings. The panel also highlights the importance of producing additional three dimensional (CGI) images to show the detail of all of the new-build elements, and the relationships between the new buildings and the existing buildings.'

The Quality Review Panel was 'delighted with the way that the scheme has progressed, and it looks forward to seeing the proposals come to fruition. Some comments on the details of the scheme remain, but the panel feels that these can be addressed in consultation with officers'.

6.5.10 Detailed QRP comments from the most recent review, together with the officer comments, are set out below in Table 1.

Table 1

Panel Comment	Officer Response
1. It will be an important development for the borough.	This is noted. The site is in urgent need of regeneration and provides an important opportunity to bring vacant homes back into use, to deliver a mix of housing to the borough in a sustainable location. This will include a wide number of benefits such as sensitive restoration of listed buildings; improved sustainability, landscaping and biodiversity; a car-free scheme; high-quality design; and optimisation of a brownfield site.
2 The proposals are moving forward well and represent a substantial amount of work by the applicants.	The applicants and officers have been in discussion and working on the proposal for over a period of 15 years to arrive at the most suitable design for the site, whilst fully accounting for heritage considerations.
3 The panel is warmly supportive of the scheme, and of the way that the project team have responded to feedback from the two previous reviews.	Noted.
4 The panel supports the scale of the proposals, the refurbishment of the chapel, the extension of the almshouses and the adjustments to the infill building on Bruce Grove.	Noted.
5. There are still some aspects of the proposals that would benefit from some further consideration. These include the arrangements for cycle parking, the entrance sequences, and circulation layout within the new-build elements. The scheme would also benefit from a greater level of articulation and detail within the elevations of the new buildings, and from further clarity and	The cycle parking for residents of the new apartment block is proposed to be located in a single building of brick construction close to the apartment building. The cycle storage building was reduced in height and the front elevation has been landscaped with a green wall. Visitor cycle spaces are proposed to be located on the western slip road and will

control of the landscaped area in front of the new apartment building.	be in a covered shelter – the full detail to be agreed via planning condition. The entrance to the apartment building has been adjusted so that it is visible from Bruce Grove making wayfinding easier. The 'staggered' footprint of this building has been redesigned to form a simple rectangle with clear accessible circulation. The new buildings have been designed in more detail, such as the addition of head jointed brick banding taking their precedent from the brick banding of the almshouses, stone copings, stone cills, and solar shading sliding screens to the south elevation of the apartment building. A full Landscape Design Statement has been prepared and proposes a 'welcome garden' in front of the apartment building with ornamental planting, seating and stepping stones to create a social space.
6 The design team will need to negotiate a careful balance between heritage requirements and energy efficient design. This should be undertaken in cooperation with Haringey officers. The panel would also welcome greater clarity of intention within the drawings in terms of the technical design of the development, which should include showing elements like air source heat pumps and photovoltaic panels within the drawings. The panel also highlights the importance of producing additional three-dimensional (CGI) images to show the detail of all of the new-build elements, and the relationships between the new buildings and the existing buildings.	There has been a number of meetings between the applicants and carbon management and heritage officers. This has involved many proposed adaptations and discussions, to reach an agreed balance on heritage and sustainability matters. ASHPs and PV panels have been included on the planning application drawings for clarification. Additional CGIs have been prepared to show the relationship between old and new as well as additional site sections.

7 The panel concluded that it is delighted with the way that the scheme has progressed, and it looks forward to seeing the proposals come to fruition. Some comments on the details of the scheme remained, but the panel considered that those could be addressed in consultation with officers.	As set out above, the specific comments raised have been carefully taken on board and there has been on-going dialogue with officers to ensure the application submission addresses all points raised.
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Height, Bulk and Massing

- 6.5.11 The Council's Design Officer has been consulted and notes that the height, massing and scale of the proposed new-build part of the development which is a maximum of three storeys in height, would successfully respond to the site's context and existing built form of surrounding buildings.
- 6.5.12 The proposal has been designed to be 'subordinate' to existing structures sitting respectfully as a secondary element, allowing the original architecture to be read as the centrepiece of the site. This has been achieved by locating the main additions to the rear of the site, behind and below the ridgeline of the Victorian structures. The new structures would not reach beyond three storeys, with the corner pavilion and additional dwelling (replacing the infill development facing Bruce Grove) being a modest two storeys and the proposed apartment building being staggered between two and three storeys with the three storey element shifted away from the rear of the Alms Houses reducing both the visual impact on the heritage asset as well as potential overshadowing and amenity impacts.
- 6.5.13 Overall, officers consider the proposal to be sensitively designed in terms of height bulk and massing, respecting the modest proportions of the historical architecture and limiting the visual impact on the conservation area. The proposal has been designed in consultation with both the Design Officer and Conservation Officer and as such is considered acceptable in this regard.

Form, Rhythm and Fenestration

- 6.5.14 The primary form and massing of the site is retained with the rows of houses around the central quadrangle and a shorter row fronting Bruce Grove retained. Whilst additions are proposed, they are largely to the rear of this arrangement, allowing this original form and rhythm to be still read as the primary form and character of the site. Then proposal would enhance this form, with the removal of the existing 1970's infill development facing Bruce Grove and its replacement with an additional house, which more sympathetically sits within this established form.

- 6.5.15 The Design Officer states that the modifications to the retained property which included two storey rear extensions and changes to the ground floor fenestration have been carefully designed to satisfy heritage considerations, following close consultation with the council's Conservation Officer and are considered in design terms to be compatible, modest and elegant.
- 6.5.16 The additional house, next to the existing gatehouse, is designed as a contemporary reinterpretation of the typical alms house, whilst also responding to, and to an extent, reflecting that of the gatehouse. Its simple, uncomplicated design, including the blank end gable facing Bruce Grove, reflects the existing almshouses.
- 6.5.17 Both new blocks (the one larger apartments block and the two corner blocks) are of a simple design, a rectilinear form and a modest, recessive rhythm of fenestration, between their stronger projecting horizontal bands and flat roofs. Their forms mark them out as contemporary, avoiding competing with the existing almshouses or being mistaken for part of the original development. Considerable care has gone into ensuring they will provide good quality homes, in attractive, private, landscaped settings, with clear routes of approach, whilst being hidden and tucked away from the main historic set pieces of the great central landscaped courtyard and of the Bruce Grove frontage.

Site Layout, Streetscape Character

- 6.5.18 The Design Officer states that the proposal layout is considered acceptable in urban design terms. There is a clarity between public and private realms, with the only new areas of public realm being the short roadway/path to the communal front door of the flatted block, and the gated path to the small 'wild garden' in the north-east corner of the site.
- 6.5.19 The route to the flatted block, although somewhat crooked, maintains a clear sight line from Bruce Grove to the front door, is short, well overlooked from the flatted block and surrounding houses, including the front door to the new gatehouse, and would be otherwise bounded by high hedges to the private gardens to the existing and new gatehouse and two of the ground floor flats. Details of the security of these boundaries should also be secured by condition.

Materials and Detailing

- 6.5.20 The Design Officer advises that the materials and detailing have been carefully considered. The main, proposed materials are to be yellow buff brick, with a darker contrasting buff across horizontal banding. The choice is designed to complement and provide a link between listed structures, including the Chapel and cottages, and the proposed new-build structures. This provides elevational richness to the development's composition as requested by the Quality Review Panel, without letting the new buildings stand out or compete with the listed buildings. In addition, grey slate will be used on the roofs to match the existing

with cast iron used for hoppers and rainwater pipes in visible areas. Buff coloured stone is proposed for dressings, lintels and cills. The use of high-quality materials is considered to be key to the success of the design standard. As such, a condition is recommended that requires further details and physical samples of the materials.

- 6.5.21 Conditions have also been recommended on any grant of permission requiring key details in both new-build elements and alterations and extensions to existing buildings, to ensure durability, elegance and compatibility with the existing listed buildings. This should include balcony cills, balustrades, and soffits, parapets to flat roofs, eaves, verge and ridge details to pitched roofs and window details to new and extended or altered existing blocks, as well as junctions to existing buildings.

Design Summary

- 6.5.22 The proposal will provide modest but elegant new residential buildings, providing much needed new housing, as well as restoring and sympathetically extending the existing chapel and homes which are currently vacant. The proposed height, proportions, fenestration and materials are appropriate, elegant, and give the proposals a confident, contemporary and complementary appearance; picking up on neighbouring existing heights, proportions and materials in a modest contemporary interpretation. The proposal promises to be of excellent quality and would greatly improve the relationship to the street and its neighbourhood, whilst being sensitive to the heritage and landscaped settings.
- 6.5.23 Therefore, the proposed design is considered to be appropriate, sympathetic and high quality and in line with the policies set out above.

6.6 Residential Quality

- 6.6.1 The Nationally Described Space Standards set out the minimum space requirements for new housing. The London Plan 2021 standards are consistent with these. London Plan Policy D6 requires housing developments to be of high-quality design, providing comfortable and functional layouts, benefiting from sufficient daylight and sunlight, maximising the provision of dual aspect homes and providing adequate and easily accessible outdoor amenity space. It provides qualitative design aspects that should be addressed in housing developments.
- 6.6.2 The Mayor of London's Housing SPG seeks to ensure that the layout and design of residential and mixed-use development should ensure a coherent, legible, inclusive and secure environment is achieved.

Indoor and outdoor space/accommodation standards

- 6.6.3 All proposed, new-build dwellings would exceed minimum space standards. In addition, the historic housing would either be returned to their original floorspace prior to conversion (8 homes), or extended with two storey, rear extensions to exceed contemporary floorspace standards. Whilst the eight homes do not meet current floorspace standards, this is the original, historic floorspace and as such is acceptable, with the proposal simply restoring the homes to their original layout. All homes would have private amenity space in the form of private gardens, terraces and balconies that meets the requirements of the Mayor's Housing SPG Standard. The site is also immediately adjacent to a public park.
- 6.6.4 The Design Officer states that 'all (new) house and flat and room sizes comply with or exceed minima defined in the Nationally Described Space Standards. All flats and houses are at least dual aspect, many triple, with northerly aspects avoided, and almost all flats and houses benefit from at least one sunny south-easterly or south-westerly aspect. The only exceptions being the two flats in the north Corner Pavilion' and three flats in the proposed Apartment Building, which are dual north-east and north-west facing, but benefit from views over particularly well landscaped areas within the site or its neighbours.
- 6.6.5. Officers acknowledge the generous private gardens provided to all houses and ground floor flats, and balconies that would be provided to upper floor flats. In addition, all flats and houses would have access to the generous landscaped shared private communal central courtyard, which provides landscaped relaxation and children's play space to more than meet needs and requirements.
- 6.6.6 As such, the proposed indoor accommodation and outdoor space proposals are considered acceptable and generally in accordance with the above policies.

Accessible Housing

- 6.6.7 London Plan Policy D7 seeks to provide suitable housing and genuine choice for London's diverse population, including people with disabilities, older people and families with young children. To achieve this, it requires that 10% of new housing is wheelchair accessible and that the remaining 90% is easily adaptable for residents who are wheelchair users. Local Plan Policy SP2 is consistent with this as is Policy DM2 of the DM DPD which requires new developments to be designed so that they can be used safely, easily and with dignity by all.
- 6.6.8 All new homes within the proposals will meet Policy D7 (Accessible Housing) of the London Plan and policy DM2 (Accessible and safe environments) of the Local Plan. The proposals also meet the London Plan (2021) Policy D7 which requires at least 10% of homes to be 'wheelchair user dwellings' M4(3) and 90% to meet Building Regulation M4(2):
- M4(2): Category 2 – Accessible and adaptable dwellings. This requirement is met when a new dwelling provides reasonable provision for most people to

access the dwelling and includes features that make it suitable for a range of potential occupants, including older people, individuals with reduced mobility and some wheelchair users.

- M4(3): Category 3 – Wheelchair user dwellings. This requirement is achieved when a new dwelling provides reasonable provisions for a wheelchair user to live in the dwelling and have the ability to use any outdoor space, parking and communal facilities.

6.6.9 In total the scheme proposes new 21 new-build homes as follows:

- 16 flats (apartment building);
- two corner pavilion buildings, comprising two apartments each (4 in total); and
- one new-build house

6.6.10 10% of these homes are allocated as wheelchair accessible (3 homes).

The 3 x one bed flats on the ground floor of the proposed apartment building will be Building Regs (Part M) M4(3) wheelchair user dwellings.

6.6.11 Five wheelchair accessible car parking spaces are provided around the central quadrangle.

Child Play Space provision

6.6.12 London Plan Policy S4 seeks to ensure that development proposals include suitable provision for play and recreation. Local Plan Policy SP2 requires residential development proposals to adopt the GLA Child Play Space Standards and Policy SP13 underlines the need to make provision for children's informal or formal play space.

6.6.13 The site has substantial open green space with the front quadrangle being the most notable space. Given the heritage setting, no formal, cordoned-off play area on the front quadrangle has been proposed as this would impact the views of the heritage assets. However, the applicants have agreed that the front green should include an area of natural play comprising balance beams, logs etc so it would blend more sympathetically and provide a more fluid play space.



Fig 7: Indicative landscaping plan

Outlook and Privacy

6.6.14 All flats and houses would be at least dual aspect, many triple, and given the site alignment northerly aspects are avoided and almost all flats and houses benefit from at least one sunny south-easterly or south-westerly aspect, the only exceptions being the two flats in the left hand Corner Pavilion, and three flats in the Apartment Building, which are dual north-east and north-west facing, but benefit from views over particularly well landscaped areas within the site.

6.6.15 Generous private gardens would be provided to all houses and ground floor flats, and balconies are provided to upper floor flats. All flats and houses have access to the generous landscaped shared private communal central courtyard, which provides landscaped relaxation and children's play space to more than meet needs and requirements.

6.6.16 In terms of privacy, the balconies have been carefully designed to ensure there is no overlooking/loss of privacy issues within the proposed development.

6.6.17 As such, it is considered that appropriate levels of outlook and privacy would be achieved for the proposed homes.

Sunlight/Daylight /overshadowing – Future Occupiers

6.6.18 Daylight and sunlight studies have been undertaken to assess the levels of light within the proposed development. The study is based on the numerical tests in the new updated Building Research Establishment (BRE) guidance 2022. Specialist 3D modelling and daylighting software has been used to predict internal daylight and sunlight levels for the proposed scheme against the above guidance.

6.6.19 The BRE suggests a set of recommendations to safeguard the daylight to main rooms (living rooms, kitchens and bedrooms) of nearby buildings when a new development or extension is proposed. The guidance provides a decision chart with sequential tests to be used to determine the impact upon daylight availability of the existing dwellings before and after the new development. The assessment metrics and the methodology are as follows:

- Distance
- 25degree Obstruction Angle
- Vertical Sky Component (VSC)
- No Sky Line (NSL) – Daylight Distribution Line (DDL)/ No-sky view

New Development

6.6.20 The submitted study states that in terms of daylight, the illuminance method has been used to assess spatial daylight autonomy. Eighty five out of the 138 assessed habitable rooms (62%) meet the BRE recommended criteria.

6.6.21 In terms of sunlight, 101 out of the 138 assessed habitable rooms (73%) meet the BRE recommended criteria for sunlight exposure.

6.6.22 Overall, the proposed new development will experience good internal daylight and sunlight levels within habitable rooms. Those rooms which do not meet the recommended criteria are predominantly north facing living rooms or living/kitchen/dining rooms within the existing houses. These existing buildings are Listed, hence there is limited opportunity to make changes due to their heritage status.

6.6.23 It should also be noted that the new BRE Guide Site layout planning for daylight and sunlight (2022) has been used for the assessment. Under the 2011 version of this guide using average daylight factor (ADF) metrics, 92% of rooms would meet the BRE recommended criteria demonstrating a good level of internal daylight within the proposed development.

6.6.24 Although some of the proposed new homes would fall below the BRE guidance for sunlight and daylight levels, this is attributed to the fact that many of the new homes are 'existing' and can only be adapted as far as their Statutory Listed status allows. Furthermore, given the fact that these new homes would also benefit from the site's unique appearance (quality landscaping, historical value, ample private and open space and strong transport links) the benefits of this should be considered and weighed against the sunlight and daylight levels.

6.6.25 Overall it is considered the homes would benefit from adequate levels of daylight and sunlight and is in accordance with Haringey DM DPD policy DM1 and BRE) guidance.

Refuse

6.6.26 The development includes widening of the carriageway in places to facilitate easier access for refuse collection and other larger delivery and service vehicles. Swept path plots have been provided for a refuse collection vehicle and these are accepted by LBH Transportation Officers. A designated waste store has been proposed for the apartment building as well as for each individual house. LBH's Waste Management Officer has commented on the application and raises no objections subject to further details being provided via condition.

Secured by Design

6.6.27 The proposal has been developed to incorporate Secure By Design principles of designing out crime and crime prevention. The proposal intends to create a safe and inclusive environment for future residents. As part of this, the design has been prepared with security, safety and the avoidance of public nuisance in mind. The landscape design reinforces the sense of security with a strategy of planting and hard landscaping. The site would also benefit from a central security regime co-ordinated by building management

6.6.28 The Secured by Design Officer does not object to the proposed development subject to the imposition of conditions requiring details of and compliance with the principles and practices of the Secured by Design Award Scheme.

6.7 Impact on Neighbouring Amenity

6.7.1 London Plan Policy D6 outlines that design of new development proposals must not be detrimental to the amenity of surrounding housing, specifically stating that proposals should provide sufficient daylight and sunlight to surrounding housing that is appropriate for its context, while also minimising overshadowing. London Plan Policy D14 requires development proposals to reduce, manage and mitigate noise impacts.

6.7.2 Policy DM1 'Delivering High Quality Design' of the DM DPD states that development proposals must ensure a high standard of privacy and amenity for a development's users and neighbours. Specifically, proposals are required to provide appropriate sunlight, daylight and aspects to adjacent buildings and land, and to provide an appropriate amount of privacy to neighbouring properties to avoid overlooking and loss of privacy and detriment to amenity of neighbouring residents. These issues are considered below.

Daylight and sunlight Impact

- 6.7.3 The applicant has submitted a Daylight and Sunlight Assessment that assesses daylight and sunlight to the windows of existing neighbouring residential properties.
- 6.7.4 The assessment finds that overall the impact of the development on existing neighbouring residential properties
- 6.7.5 In terms of daylight and sunlight impacts on existing neighbours, the study finds no loss of daylight and a small loss of sunlight to neighbouring properties (annual hours, but no loss for winter hours). This is a good performance for development in an urban location, especially considering that the existing site is unusual in having no buildings above one storey in the area closest to the houses on Elsdon Road. As such the proposal is within with Building Research Establishment (BRE) expectations and neighbouring properties are not impacted to a significant degree with properties retaining sufficient sunlight.

Privacy/Overlooking and Outlook

- 6.7.6 Concerns have been raised that the proposed development would result in a loss of privacy/overlooking issues, particularly with regards to the terraced homes immediately east of the site on Elsdon Road. This corner of the site is where there would be the greatest potential impact on existing residential amenity. In addition, also within situated this corner of the development, just to the south and next door to the existing Gatehouse there are flats at no. 68E is Bruce Grove.
- 6.7.7 The proposed apartment block would be closest to the houses on Elsdon Road, but it would be set out at about 45° to these houses, and its closest corner and would be approximately 18m from the nearest face of the houses' rear projection. Eighteen metres is considered to be an acceptable distance to avoid any material loss of privacy in an urban area. There is also fairly dense vegetation along the boundary, within both the application site and the neighbouring houses gardens, further softening any impact. Proposed landscaping will further densify the vegetation.
- 6.7.8 The layout of the proposals is largely determined by the existing property layout, with rear extensions to the original almshouses only modestly increasing their rear projections, and the four new build blocks would be set out within the form, pattern and separation between existing blocks in order to avoid overlooking between homes within the development.
- 6.7.9 Taking account of the urban setting of the site and the established pattern and form of the neighbouring development the proposal is not considered to result in an unacceptable material impact on local amenity in terms of loss of outlook or privacy.

Other Amenity Considerations

- 6.7.10 Policy DM23 of the DM DPD states that new developments should not have a detrimental impact on air quality, noise or light pollution.
- 6.7.11 The submitted Air Quality Assessment (AQA) concludes that the development is not considered to be contrary to any of the national and local planning policies regarding air quality. Officers accept the findings of this report.
- 6.7.12 The increase in noise from occupants of the proposed development would not be significant to neighbouring occupants given the established residential use of the site and the current urbanised nature of the surroundings.
- 6.7.13 Demolition and construction impacts are largely controlled by non-planning legislation and are of a temporary nature. Nevertheless, conditions have been imposed requiring details and control over the demolition and construction methodology.
- 6.7.14 Therefore, it is considered that the proposal would not have a material adverse impact on the amenity of residents and occupiers of neighbouring and surrounding properties.

6.8 Parking and Highways

- 6.8.1 Local Plan Policy SP7 states that the Council aims to tackle climate change, improve local place shaping and public realm, and environmental and transport quality and safety by promoting public transport, walking and cycling. This approach is continued in Policies DM31 and DM32 of the DM DPD.
- 6.8.2 London Plan Policy T1 sets out the Mayor's strategic target for 80% of all trips in London to be made by foot, cycle or public transport by 2041. This policy also promotes development that makes the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport. Policy T6 sets out cycle parking requirements for developments, including minimum standards. T7 concerns car parking and sets out that 'car-free' development should be the starting point for all development proposals in places that are well-connected by public transport. Policy T6.1 sets out requirements for residential car parking spaces.
- 6.8.3 The site is located within the Bruce Grove North CPZ, which restricts parking to permit holders only Monday to Saturday, 0800 – 1830, there are extra extended hours on THFC events days. The development fronts onto Bruce Grove which is a part of Transport for London's Road Network (TLRN), who are the Highway Authority rather than Haringey Council. The proposal site has PTAL rating of 5

indicating that its access to public transport is very good when compared to London as a whole, suggesting that there are opportunities for trips to be made to and from the site by modes other than the private car. The proposal site has convenient access to shops, services, facilities and transport links. Bruce Grove Overground station is only a 2min bike ride and approximately 7min walk from the site location. Furthermore, in close proximity to the northern entrance are 2 bus stops which are served by bus routes 123 and 243.

Parking

- 6.8.4 The Transport officer notes that the revised proposal would be a car free development with the residents not being able to attain a parking permit, therefore there would be no need to increase on-street parking bays as no new demand will be generated from the development. This is further supported by the Bruce Grove North CPZ, which restricts parking to permit holders only for Monday to Saturday, 0800 – 1830. The proposal would provide 5 on street blue badge car parking spaces, which would meet the 10% blue badge parking requirement. Additionally, all accessible bays associated with the development must be for resident use only; and this would be secured within the proposed legal agreement.

Car Free

- 6.8.5 The original iteration of this application proposed 28 residential on-site car parking spaces, plus 2 visitor car parking bays; 81 long-stay and 2 short-stay cycle parking. At the request of officers, the proposal has been revised to accord with planning policies. A 'car-free' development is now proposed, and permits would not be allocated to the new properties for on-street parking. Due to the site's public transport accessibility level (PTAL) (5 - 'very good' access to public transport services) the proposed development would therefore be acceptable as a car free development, in accordance with Policy DM32 of the DM DPD. The applicant will need to enter into a legal agreement to secure future parking control.

Cycle parking

- 6.8.6 For the residential provision proposed, to meet the numerical requirements of the London Plan, 81 residential cycle parking spaces and 3 visitor spaces should be provided. Locations for storage have been designated to the rear of each house as well as a designated storage area for the proposed apartment block.
- 6.8.7 Transportation Officers require fully dimensioned layout and installation details for the long and short stay cycle parking, to demonstrate adherence with the London Cycle Design Standards. This information is required prior to commencement of any physical works at the site. As such, a pre commencement condition is included.

Deliveries and Servicing

- 6.8.8 A deliveries and servicing management plan has been submitted with the application. The Transport officer notes that delivery and service vehicles and refuse/recycling collection vehicles will progress along Edmansons Close, and a plot for a collection vehicle is included within the Transport Assessment. The Transport Assessment (TA) references location of bin stores within 25m of the collection point, and it is noted that Haringey's waste and recycling team have commented on the proposals and are supportive of the proposed arrangements.
- 6.8.9 As such, the proposed arrangements are considered to be satisfactory and this has been confirmed by the Waste Collection team subject to further details to be supplied via condition.

Construction Logistics and Management

- 6.8.10 The applicant has submitted a draft Construction and Logistics Plan detailing a number of aspects of the proposed arrangement. Additional refinements are required, which can reasonably be secured by a condition.
- 6.8.11 Overall, it is considered that the application is acceptable in transport and parking terms, and in terms of its impact on the public highway.

6.10 Sustainability, Energy and Climate Change

- 6.10.1 The NPPF requires development to contribute to the transition to a low carbon future, reduce energy consumption and contribute to and conserve the natural environment.
- 6.10.2 London Plan Policy SI2 'Minimising greenhouse gas emissions', states that major developments should be zero carbon, and in meeting the zero-carbon target, a minimum on-site reduction of at least 35 per cent beyond Building Regulations is expected. Local Plan Policy SP4 requires all new developments to introduce measures that reduce energy use and carbon emissions. Residential development is required to achieve a reduction in CO2 emissions. Local Plan Policy SP11 requires all development to adopt sustainable design and construction techniques to minimise impacts on climate change and natural resources.
- 6.10.3 Policy DM1 of the DM DPD states that the Council will support design-led proposals that incorporate sustainable design and construction principles and Policy DM21 of the DM DPD expects new development to consider and implement sustainable design, layout and construction techniques.

Carbon Reduction

6.10.4 Policy SP4 of the Local Plan Strategic Policies requires all new development to be zero carbon. The London Plan 2021 further confirms this in Policy SI2

6.10.5 The applicant has revised and updated their Energy Assessment and Statement on the advice of LBH Carbon Reduction Officers. The redevelopment now achieves a site-wide carbon reduction of 65% (New Build – 75% and refurbishment 62%) and as such exceeds the 35% on-site target. This is achieved with efficient building fabric elements (roof, windows, walls etc.) for the new-build section of the proposal and refurbishment for the existing buildings, including the following systems.

- individual air-source heat pumps
- direct electric heating (for small 1-bed almshouses)
- 16kWp Solar Photovoltaic system

6.10.6 Although, there has been an improvement in the proposed building fabric specification of the refurbished almshouses, the very high Energy Use Intensity (EUI) and Space Heating Demand (SHD) would still result in high energy costs for the future occupants. The submitted Life Cycle costs analysis of the heating system for new build and refurbishment shows the heating system's operational costs for refurbished almshouses is almost 2.5 times than that for new build.

6.10.7 Officers acknowledge the heritage and conservation constraints in the existing dwellings in comparison to the new-build structures. The applicant is required to maximise all opportunities to improve the energy efficiency of the existing property and to minimise the EUI and SHD for better energy security of the occupants. The updated Energy Strategy shows that improvements to energy efficiency are secured for both the new-build and the existing structures and overall the scheme would meet zero-carbon policy requirements as outlined in London Plan Policy SI2. The imposition of planning conditions have been recommended to secure the benefits.

6.10.8 Given that overall, the proposed development achieves a site-wide carbon reduction of 65%, an estimated carbon offset contribution (and associated obligations) of £92,625 (indicative), plus a 10% management fee is required in order to meet the zero-carbon target for the site as a whole as required by London Plan Policy SI2. This is outlined in the Heads of Terms.

Green Energy - Refurbishment

6.10.9 A full electric heating solution for the scheme is proposed, including:

- Individual direct electric heating for one bed almshouses homes,
- Individual air source heat pumps for 2 and 3 beds almshouses and new build.

6.10.10 The applicant has explored opportunities to install Solar PV on the roof of the existing houses. In line with the heritage and conservation considerations, PV solar panels could be installed on the roof, as the panels would not be visible from street level. However these roofs are mostly oriented towards the north, which is less efficient orientation, therefore Solar PVs are not proposed as part of the refurbishment.

Green Energy - New Build

6.10.11 A Solar PV system is proposed on all available new-build roof spaces. A 16kWp solar PV system is proposed with 47 panels of 350W each at an angle of 5-10 degrees towards a southerly direction. In line with the London Plan Policy SI2, the applicant must maximise the opportunity of on-site energy generation and therefore is required to provide evidence of maximising solar PV coverage on the available new build roof space at later stages. This is secured via condition.

Overheating

6.10.12 The Chartered Institution of Building Services Engineers (CIBSE) TM59 aims to provide a standardised approach to predicting overheating risk for residential building designs using dynamic thermal analysis. The overheating analysis has been revisited a number of times, and the final version has modelled fourteen representative homes from the new proposed dwellings using updated weather data for London DSY1-3 2020s. All dwellings would pass the CIBSE TM59 criteria when assessed assuming no usability constraints in opening of the windows, which indicates that the design makes good use of passive cooling features like natural ventilation and shadings, which help keep indoor temperatures comfortable

6.10.13 However, when applying the windows opening constraints for the accessible flats, where windows may not be opened at night due to safety concerns, the report indicated some risks of overheating. To mitigate this, it is proposed to install a small cooling unit called air tempering with the Mechanical Ventilation with Heat Recovery (MVHR) system within the affected dwellings.

6.10.14 The final design features to reduce overheating in the new dwellings are as follows:

- Natural ventilation with openable windows
- Solar control glazing with g-value of 0.40
- External shading provided by balconies to some apartments, as per design proposals
- External shading provided by an increase external reveal depth of 250mm
- External louvres sliding screens on south façade of the apartment building
- Enhanced mechanical ventilation rates of 2ach in bedrooms

6.10.15 Additional measures that could be used in future includes:

- A guide for residents on how to keep their homes cool
- Reflective blinds to reduce sunlight entering the home
- Plug-in fans to improve air circulation
- Utility cupboards and MVHR homes to be designed to include air tempering cooling boil-on homes as future mitigation measure

6.10.16 A CIBSE TM59 analysis of the existing dwellings has also been undertaken and the results shows the most spaces (Kitchen, Living and Dining) pass the CIBSE TM59 criteria while the bedrooms fail. Although bedrooms fail, the number of hot nights has been significantly reduced compared to previous assessments.

6.10.17 For refurbished dwellings, the proposed overheating mitigation measures are limited as it is historical building, and major adjustments cannot be made to the building fabric. They are:

- Improving glazing specifications
- Incorporating internal blinds
- Standing fans

6.10.18 An updated overheating report will need to be submitted to confirm the overheating mitigation strategy in the Overheating Assessment as well as future mitigation measures for both new build and existing parts of the development; this can be adequately addressed at a later stage, and as such this matter can be secured by condition. It should be noted that LBH Carbon Management Officers have worked alongside LBH Conservation Officers in seeking amendments to the scheme, balancing the need for energy efficiency and historic building conservation.

Summary

6.10.19 The proposal satisfies development plan policies and the Council's Climate Change Officer supports this application subject to the conditions as this scheme will ensure existing historic structures are upgraded in terms of energy efficiency and new residential dwellings have been designed at a high sustainability standard. As such, the application is considered acceptable in terms of its sustainability.

6.11 Urban Greening, Trees and Ecology

6.11.1 Policy G5 of The London Plan 2021 requires major development proposals to contribute to the greening of London by including urban greening as a

fundamental element of site and building design. London Plan Policy G6 seeks to manage impacts on biodiversity and aims to secure biodiversity net gain.

6.11.2 Policy SP11 of the Local Plan promotes high quality landscaping on and off-site and Policy SP13 seeks to protect and improve open space and requires that opportunities for biodiversity and nature conservation are provided.

6.11.3 Policy DM1 of the DM DPD requires proposals to demonstrate how landscape and planting are integrated into the development and expects development proposals to respond to trees on or close to a site. Policy DM21 of the DM DPD expects proposals to maximise opportunities to enhance biodiversity on-site.

6.11.4 London Plan Policy G7 requires existing trees of value to be retained, and any removal to be compensated by adequate replacement. This policy further sets out that planting of new trees, especially those with large canopies, should be included within development proposals. Policy SP13 of the Local Plan recognises, 'trees play a significant role in improving environmental conditions and people's quality of life', where the policy in general seeks the protection, management and maintenance of existing trees.

Biodiversity Net Gain (BNG)

6.11.5 From 12th February 2024, the Environment Act 2021 introduced mandatory requirements to demonstrate at least 10% net gain for major planning applications. Applications submitted prior to this date are not required to demonstrate a 10% net gain.

6.11.6 This planning application was originally received by the council in September 2022 and as such BNG is not required by policy.

6.11.7 However the applicant has undertaken and submitted a Preliminary Ecological Appraisal. Any planting on site will incorporate the suggested measures outlined in the report, include the incorporation of native plants, integrated bat roosting and bird nesting, hedgehog gaps in fencing and bug hotels/ log piles where possible.

6.11.8 A landscaping condition has been proposed in order to finalise details on the proposed green spaces across the site both existing and proposed.

Ecology and Biodiversity

6.11.9 Within the site, amenity grassland, hedges, trees, and wildflower planting is proposed to maximise the number of native species assisting with achieving the highest ecological value.

6.11.107 Whilst these measures are acceptable in principle, further information is required in respect of proposed mitigation and enhancement measures. This can be secured by the imposition of a condition.

6.11.11 Therefore, subject to conditions the proposal is acceptable in terms of its impact on trees, ecology and biodiversity, and its provision of urban greening.

Urban Greening Factor

6.11.12 The urban greening factor (UGF) identifies the appropriate amount of urban 'greening' required in new developments. The UGF is based on factors set out in the London Plan such as the amount of vegetation, permeable paving, tree planting, or green roof cover, tailored to local conditions. The London Plan recommends a target score of 0.4 for developments which are predominately residential.

6.11.13 The existing site currently comprises of trees, grassland, hedging and shrubs and impermeable hardstanding. The proposed development would include permeable paving, amenity grassland, shrubs, planting, hedges, trees, and green roofs and achieves an UGF of 0.4423 exceeding the London Plan Policy GF target of 0.4.

6.11.14 As such this is considered acceptable. Final details of landscaping would be secured by the imposition of a condition to secure a high-quality scheme with effective long-term management.

Trees

6.11.15 Fifteen are proposed for removal. This includes 1 x category B 'Moderate' Quality' tree. The remaining 14 trees are either category C 'low quality' or category U 'Unsuitable to retain'.

<i>Category</i>	<i>Individual Trees</i>	<i>Groups of Trees</i>
<i>U (Unsuitable to retain)</i>	<i>6</i>	<i>0</i>
<i>A (High Quality)</i>	<i>0</i>	<i>0</i>
<i>B (Moderate Quality)</i>	<i>1</i>	<i>0</i>
<i>C (Low quality)</i>	<i>8</i>	<i>0</i>

6.11.16 The Council's Tree Officer has been consulted on the proposal and considers the removal of the above trees acceptable subject to suitable, high-quality replacements being provided, and an agreed aftercare programme. The replacements also offer the opportunity to enhance the setting of the listed buildings and the conservation area by improving the planting and landscaping to reflect the quality of the heritage assets. Given the lack of 'high quality' Category A trees and the number of existing 'low quality', category C trees, officers

consider the replacement trees to significantly enhance the setting of the listed buildings and the wider heritage asset.

6.11.17 Twenty-three new trees (made up of 10 varieties) are proposed on the site, replacing the No.15 category U and C category trees proposed for removal. As such the site will benefit from a net-gain of eight trees, whilst also benefiting from the replacement of poor quality or unsuitable existing trees. Replacement trees include English Oak (2), Bird Cherries (2), Kanzan cherries (6) and Downy Birch (2).

6.11.18 The species have been informed by the Preliminary Economic Assessment and discussions with the Council's Arborist. The quantum and selected species outlined by the applicant are considered appropriate for the site as well as mitigating the loss of the trees outlined above. As such, this is considered acceptable and supported by officers.

6.12 Flood Risk and Drainage

6.12.1 Policy SP5 of the Local Plan and Policy DM24 of the DM DPD seek to ensure that new development reduces the risk of flooding and provides suitable measures for drainage. The site is located within Flood Zone 1 which has the lowest risk of flooding from tidal and fluvial sources.

6.12.2 The applicant has submitted a Flood Risk Assessment and Drainage Strategy report. These have been reviewed by the LBH Flood and Water Management officer who has confirmed that they are satisfied that the impacts of surface water drainage will be addressed adequately. Recommended conditions have been added accordingly.

6.12.3 Thames Water raises no objection with regards to water network infrastructure capacity and surface water drainage if the developer follows the sequential approach to the disposal of surface water. Thames Water recommends imposing an informative regarding and water pressure.

6.13 Air Quality and Land Contamination

6.13.1 Policy DM23 of the DM DPD requires all development to consider air quality and improve or mitigate the impact on air quality in the borough and users of the development. An Air Quality Assessment ('AQA') was prepared to support the planning application and concluded that the site is suitable for residential use and that the proposed development would not expose existing residents or future occupants to unacceptable air quality. It also highlighted that the air quality impacts from the proposed development during its construction phase would not be significant and that in air quality terms it would adhere with national or local planning policies.

6.13.2 The Council's Pollution Officer raises no objection to the proposed development in respect to air quality subject to the imposition of conditions and informatives which have been added accordingly.

6.13.3 Concerns have been raised about construction works however, these are temporary impacts and can be mitigated through an agreed a construction management plan which would include air quality control measures such as dust suppression. The proposal is not considered an air quality risk or harm to nearby residents, or future occupiers. The proposal is acceptable in this regard.

Land Contamination

6.13.4 Policy DM23 (Part G) of the DM DPD requires proposals to demonstrate that any risks associated with land contamination can be adequately addressed to make the development safe.

6.13.5 The applicant has submitted a Phase I Contaminated Land Assessment prepared by Geo-Smart Information Ltd (dated September 2022) which investigates Potential Sources of Contamination from a number of active and inactive industrial land uses within 51 – 250m of the site. The Preliminary Risk Assessment indicated a moderate/low risk. As such there LBH Pollution Officer raises no objection to the proposed development, subject to conditions.

6.13.6 As such, the proposed site is likely to be suitable for a residential development, subject to further detailed investigation and any subsequent recommended remedial works that may be required for the proposed end use would be secured by condition.

6.14 Fire Safety

6.14.1 London Plan Policy D12 states that all major development proposals should be submitted with a Fire Statement, which is an independent fire strategy, produced by a third party, suitably qualified assessor. The policy outlines 6 key areas relating to how the development proposal will function; this includes means of escape, features which reduce the risk to life, access for fire service personnel and equipment and provision of access to the development within the curtilage. The applicant has submitted a Fire Statement by Tetra Tech outlining a response to each criterion. Officers are satisfied that the above policy criteria have been met. In addition, a formal, detailed assessment will be undertaken for fire safety at the building control stage of the construction process.

6.15 Employment

6.15.1 Local Plan Policies SP8 and SP9 aim to support local employment, improve skills and training, and support access to jobs. The Council's Planning Obligations

Supplementary Planning Document (SPD) requires all major developments to contribute towards local employment and training.

6.15.2 There would be opportunities for borough residents to be trained and employed as part of the development's construction process. The Council requires the developer (and its contractors and sub-contractors) to notify it of job vacancies, to employ a minimum of 20% of the on-site workforce from local residents (including trainees nominated by the Council). These requirements would be secured by legal agreement.

6.15.3 As such, the development would have a positive impact in terms of employment provision.

6.16 Equalities

6.16.1 In determining this application, the Council is required to have regard to its obligations under Section 149 of the Equality Act 2010. Under the Act, a public authority must, in the exercise of its functions, have due regard to the need to:

- eliminate discrimination, harassment and victimisation and any other conduct that is prohibited by or under this Act
- advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it
- foster good relations between persons who share a relevant protected characteristic and persons who do not share it

6.16.2 The three parts of the duty apply to the following protected characteristics: age, disability, gender reassignment, pregnancy/maternity, race, religion/faith, sex and sexual orientation. Marriage and civil partnership status applies to the first part of the duty. Members must have regard to these duties in taking a decision on this application. In addition, the Council treats socioeconomic status as a local protected characteristic, although this is not enforced in legislation. Due regard must be had to these duties in the taking of a decision on this application.

6.16.3 The scheme would provide a private market housing development, consisting of 48 homes in total through new build and refurbished properties, which can significantly advance equality under the UK Equality Act 2010 by addressing the needs of individuals across all protected characteristics. By providing a range of new and accessible housing, the scheme promotes age inclusivity, supporting both younger and older residents, and ensures reasonable adjustments for people with disabilities, fostering independence and dignity. In delivering a range of homes the scheme should not prejudice people undergoing gender reassignment, pregnant people or those in maternity, or people from diverse racial, religious, and cultural backgrounds. Furthermore, by applying inclusive design, the scheme would be able to support equality for all sexes and sexual orientations, ensuring

that no group is disadvantaged. Overall, the scheme is expected to contribute to eliminating discrimination and advancing opportunity.

6.16.4 The overall equalities impact of the proposal would be positive, and any limited potential negative impact on people with protected characteristics would be both adequately mitigated by conditions and would be significantly offset by the wider benefits of the development proposal overall. It is therefore considered that the development can be supported from an equalities standpoint.

6.17 Conclusion

- Although no affordable homes can viably be delivered within this scheme, the provision of new high-quality housing through refurbishment of vacant homes and new build homes, including family housing, will contribute to the Borough's housing stock and targets. The site has been fully vacant since August 2024.
- The mix and quality of new-build accommodation are acceptable and either meet or exceed relevant planning policy standards. The dwellings have private external amenity space and all dwellings are in close proximity to a substantial sized open space – the central quadrangle.
- The design and appearance of the development responds appropriately to the local context and is supported by the Quality Review Panel
- The refurbishment works to the Grade II listed chapel are welcomed and would greatly improve and enhance the character of the building as a focal building within the site and would have a positive impact on the character of the listed building. The proposal to retain and carry out improvement works to remove an unsympathetic extension and undertake internal refurbishment works to the Grade II listed building are welcomed and will greatly improve and enhance the character appearance of the chapel as a focal building within the conservation area. Currently vacant, this heritage asset will be brought back into use and upgraded in line with contemporary housing standards.
- The proposed development would lead to less than substantial harm to the significance of the conservation area and its assets, which would be outweighed by the public benefits of the development; primarily in the form of additional housing and refurbishment of vacant listed homes and the chapel.
- The proposal would provide good quality hard and soft landscaping with 23 new trees; a net gain on 8 trees above the existing.

- The proposal has been designed to avoid any material harm to neighbouring amenity in terms of loss of sunlight and daylight, outlook, or privacy, and in terms of excessive, noise, light or air pollution.
- The revised development would be 'car free' and would provide an appropriate quantity of cycle parking spaces for this location and would be further supported by sustainable transport initiatives. There would be no significant adverse impacts on the surrounding highway network or on car parking conditions in the area.
- The development would provide appropriate carbon reduction measures and a carbon off-setting payment to provide a zero carbon development, as well as site drainage and biodiversity improvements. The scheme would meet the Council's sustainability objectives and provide an increase in urban greening and biodiversity. The proposed development would secure several obligations including financial contributions to mitigate the residual impacts of the development.

7.0 COMMUNITY INFRASTRUCTURE LEVY (CIL)

Based on the information given on the plans, the Mayoral CIL charge will be £103,201.35 (1,451.70sqm x £71.09) and the Haringey CIL charge will be £85,490.61 (1,451.70sqm x £58.89). This will be collected by Haringey after/should the scheme is/be implemented and could be subject to surcharges for failure to assume liability, for failure to submit a commencement notice and/or for late payment, and subject to indexation in line with the RICS CIL Index. An informative will be attached advising the applicant of this charge.

8.0 RECOMMENDATIONS

GRANT planning permission and listed building consent for the reasons set out in Section 2 above.