

Planning Statement

Watts Close,
Tottenham, N15

London Borough of Haringey

January 2022

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CONTENTS

1. INTRODUCTION	3
2. THE PROPOSED DEVELOPMENT	5
3. SITE AND SURROUNDING CONTEXT	7
4. HISTORY	9
Planning history	
Pre-application engagement	
Community engagement	
5. PLANNING POLICY AND LEGISLATIVE OVERVIEW	10
Introduction	
Statutory Framework	
National Planning Policy Framework (NPPF) - 2021	
The London Plan 2021	
Local Planning Policy	
6. PLANNING ASSESSMENT	16
Introduction	
Principle of development	
Housing provision	
Residential mix	
Housing tenure	
Quality of accommodation	
Design, townscape and heritage	
Landscaping/trees, public realm, amenity and play space	
Ecology	
Impact on neighbouring amenity	
Transport and parking	
Crime Prevention	
Sustainability and energy	
Refuse and recycling	
Other environmental considerations	
7. CIL AND PLANNING OBLIGATIONS	37
Community Infrastructure Levy (CIL)	
Planning obligations	
8. CONCLUSION	38

1. INTRODUCTION

1.1 This Planning Statement is submitted in support of a planning application made by the London Borough of Haringey for the redevelopment of land at Watts Close and Lomond Close, Tottenham, N15 for residential use.

1.2 The description of development is as follows:

“Demolition of 11 existing bungalows and community building to deliver 18 new homes for council rent. The proposed development will comprise of six, two-storey family houses (three and four bedrooms) and 12 apartments (one and two bedrooms) in two, three-storey blocks including two wheelchair user dwellings. The proposals also make provision on-site for two wheelchair parking spaces, amenity and play space, landscaping and cycle and refuse/recycling storage.”

1.3 All affordable homes proposed will be for Haringey Council Rent and are therefore considered to be ‘genuinely affordable’ homes.

1.3 The proposals forms part of London Borough of Haringey’s response to the GLA’s ambitious ‘Building Council Homes for Londoners Programme’. This will help Londoners who would otherwise struggle to rent or buy, and forms part of Homes for Londoners - the Mayor’s work to tackle London’s housing crisis. The Mayor published his Building Council Homes for Londoners funding prospectus in May 2018. This will help councils to build a new generation of council homes, with the majority of homes based on social rent levels.

1.4 In May 2018, the Council committed to delivering a new generation of council homebuilding and the first step towards this, a thousand new council homes at council rents by 2022 – the first in Haringey for more than forty years. This Housing Delivery Programme is about transforming the lives of thousands of Haringey people. It will provide affordable, high quality, sustainable and secure homes of the right size to homeless households and to those on the Housing Register in the most urgent need. For many of those in greatest need, a council home also offers the only real chance of putting down roots in Haringey. The Council is to build as many of these new council homes itself, which can include ‘infill’ on existing estates, adding to existing buildings or using council land which until recently was used for other purposes.

1.5 All new Council homes built will be managed by Homes for Haringey who currently manage the Council’s existing stock.

1.6 This site, in the Council’s ownership was identified as part of the Council’s Housing Delivery Programme on account of its location, existing use and context. The site is in an accessible and established residential area and comprises a row of old garages, open space and public realm.

1.7 Having regard to the Council’s corporate priorities and local planning objectives to deliver high quality sustainable development, the site is considered to be most appropriately used for new residential purposes. The current proposals are for the erection of 18 homes in a number of carefully designed buildings with associated amenity space, landscaping and parking. The application follows detailed pre-application engagement with the London Borough of Haringey and the local community. The resultant scheme is consequently a high-quality design that makes optimal use of the site, contributing to meeting London’s and the Borough’s housing requirements, and bringing about considerable improvements to the site and the locality generally.

- 1.8 The development proposed complies with local planning policies and in particular makes provision for affordable housing and improved amenity space and incorporates appropriate mitigation to safeguard neighbouring residential amenity. The key objective is to ensure that development sits comfortably on site, provides a mix of well-designed dwellings and enhances the appearance of and amenity of the local area.
- 1.9 The purpose of this Planning Statement is to identify and assess the scheme against relevant planning policy to assist the Council in its determination of the application. This is influenced by a description of the proposals; confirmation of the extent of pre-application engagement and liaison there has been with key stakeholders and the local community; identifying planning policy at a national, regional and local level relevant to the consideration of the proposals; identifying relevant material considerations; and, providing a conclusion as to why the proposals are acceptable.
- 1.10 This Statement should be read in conjunction with the architectural plans/elevation drawings and the following documents which are submitted as part of this application, which has been agreed with officers through pre-application discussions that have been undertaken to date:
- Application form / CIL forms / Ownership certificate
 - Acoustic Assessment prepared by Anderson Acoustics
 - Air Quality Assessment prepared by RSK
 - Arboricultural Impact Assessment and Method Statement by TEP
 - Construction Management and Logistics Plan prepared by PRP
 - Design and Access Statement prepared by Newground Architects including a Landscaping Strategy prepared by Turkington Martin
 - Ecological Assessment prepared by TEP
 - Embodied Carbon Life Cycle Assessment prepared by Sustain Quality
 - Energy and Sustainability Report prepared by Sustain Quality
 - Fire Strategy Report prepared by BB7
 - Overheating Assessment prepared by Flatt
 - Phase 1 Geo-tech Desktop Survey by Ecologica
 - Planning Statement prepared by London Borough of Haringey
 - Statement of Community Involvement prepared by London Borough of Haringey
 - SUDS and Drainage Statement prepared by Sweco
 - Sunlight, Daylight and Overshadowing Report by Right of Light Consulting
 - Transport Assessment including Parking Stress Survey prepared by Icen
- 1.11 The Statement is structured as follows:
- Section 2 - provides detail of the application proposals.
 - Section 3 - describes the site and surrounding context.
 - Section 4 - details briefly the planning history, pre-application and community engagement processes.

- Section 5 - provides an overview of the key national, regional and local planning policy and guidance and legislation relevant to the assessment of the proposed development.
- Section 6 - provides an assessment of the proposal against the and the key provisions of the Development Plan and other material considerations.
- Section 7 – briefly concludes on the key merits of the proposed development.

2. THE PROPOSED DEVELOPMENT

- 2.1 Full planning permission is sought for the re-development of the site for residential use (Class C3) with associated amenity space and landscaping.
- 2.2 The intended approach, as indicated in the plans submitted is to secure a residential development which provides for a range of accommodation to meet local housing need in a manner that respects neighbouring residential amenity and the character and appearance of the surrounding area.
- 2.3 In detail, the application scheme comprises 18 new self-contained dwellings comprising:
- 12 apartments (incl. 2 wheelchair homes)
 - 6 houses
- providing the following accommodation:
- 4 x one-bed two-person apartments incl. 2 wheelchair homes (22%)
 - 8 x two-bed four-person apartments (45%)
 - 6 x three-bed five-person houses (33%)
- 2.4 The proposed 12 apartments (1 and 2 beds) are contained within three-storey buildings bookend 4 of the proposed two-storey houses to form a linear block of development orientated west to east across the centre of the site and accessed from Seaford Road and Greenfield Road. The two other proposed houses present a semi-detached pair sitting to the north and rear of this block accessed from Lomond Close. The proposed homes are at least dual aspect, incorporate storage and include terraces, balconies and/or gardens which comply with the relevant planning policy space standards. A communal amenity space including a children's play area is presented across the front of the main block to serve the dwellings in this part of the development.
- 2.5 Cycle parking and refuse/recycling storage is provided again in accordance with the necessary policy requirements and guidance. Individual air source heat pumps are also located within or adjacent each dwelling to cater for heating requirements. At roof level provision is made for photo-voltaic panels and green roofs.



Aerial view of proposed development

- 2.6 The proposed development presents a comprehensive landscaping scheme to ensure the setting of the new homes is attractive, green and safe and complements and enhances the character and appearance of the surrounding area. New planting including trees, surfacing, seating and lighting will feature as part of the treatment of the site. The Applicant is also exploring the possibility of CCTV on-site to enhance security.
- 2.7 In respect to car parking, the existing parking area off Seaford Road will be removed as part of the redevelopment of the site, and two off-street wheelchair accessible spaces with electric charging points provided to serve two proposed wheelchair user homes. The proposed development is intended to be car-free subject to further discussions with the Local Planning Authority.
- 2.8 The proposed development is planned and designed to respect the character and appearance of the surrounding area and optimise the use of the site for affordable housing having regard to its location, constraints and opportunities. In particular, the scale and form of the buildings reflect the shape of the site and the nature of the local built environment and neighbouring residential and visual amenity. The planned scheme seeks to reflect the predominant terraced pattern of development in the area and varies in height from 2 to 3-storeys to respond to the adjoining scale of the existing neighbouring property.
- 2.9 The development has been carefully designed to present attractive and contemporary buildings which respond to the form and function of the proposed accommodation whilst having regard to the varied architecture within the surrounding area. The proposed buildings will be constructed using high-quality masonry and incorporate well-proportioned and recessed windows with vertical piers and carefully placed framed and open balconies/terraces. The simple articulation of the elevations seeks to complement their

proportions and provide a structured and robust architectural language across the development.

- 2.10 A red brick has been selected given the varied materiality within the local area and assists in reinforcing the architectural approach across the development and tying the different building typologies together. Additional brickwork detailing, stonework headers and cills, and appropriately designed and coloured metal panelling and railings will provide contrast and further visual interest to the building facades.
- 2.11 The proposal has sought to adopt a progressive approach to sustainability and deliver a zero-carbon development. The proposed buildings will have high levels of insulation and incorporate features such as energy efficient heating and photovoltaic solar panels, that will keep running costs low whilst minimising overheating risks. The scheme achieves a total carbon emission saving of over 100% over the baseline requirements within the Building Regulations and it will be also constructed with responsibly sourced and environmentally friendly materials. The comprehensive landscaping strategy will enhance local biodiversity and assist with climate change through substantial new planting including new and replacement tree and sustainable urban drainage.

3. SITE AND SURROUNDING CONTEXT

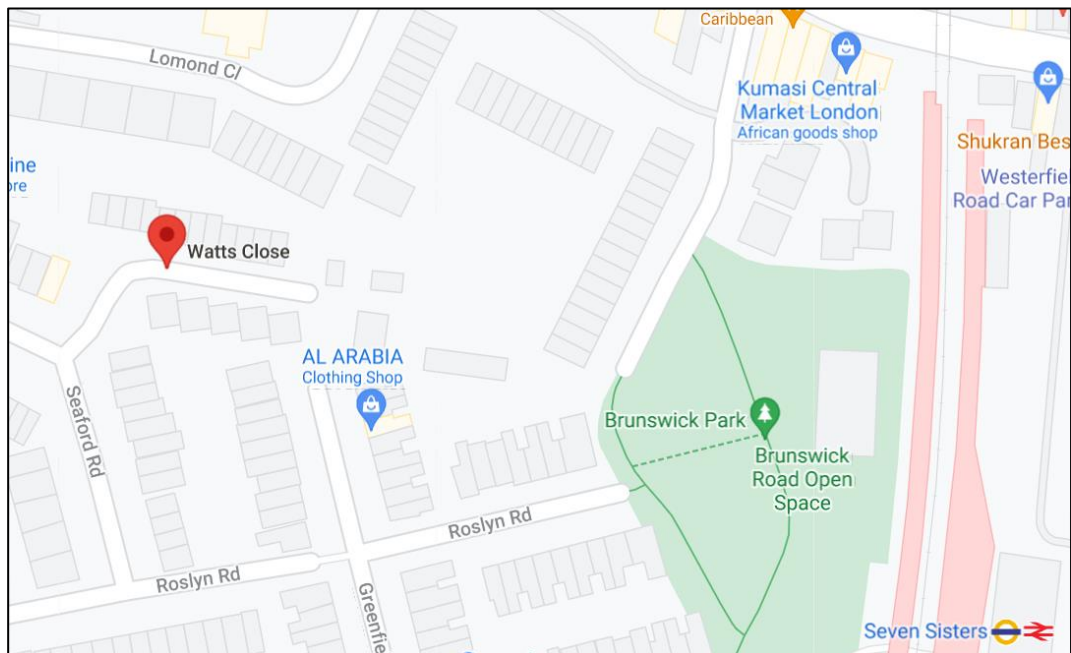
- 3.1 The site is located on Watts Close in the Tottenham Green Ward of the London Borough of Haringey. It measures 0.2741 hectares and comprises 11 bungalows in use as Temporary Accommodation with an associated parking area access off Seaford Road and a small and unused community building accessed from Lomond Close. A publicly accessible footpath runs through the centre of the site linking through to Greenfield Road. A sub-station and area of open space is located on the site's eastern boundary (see photograph and location maps below).



Aerial photograph of site

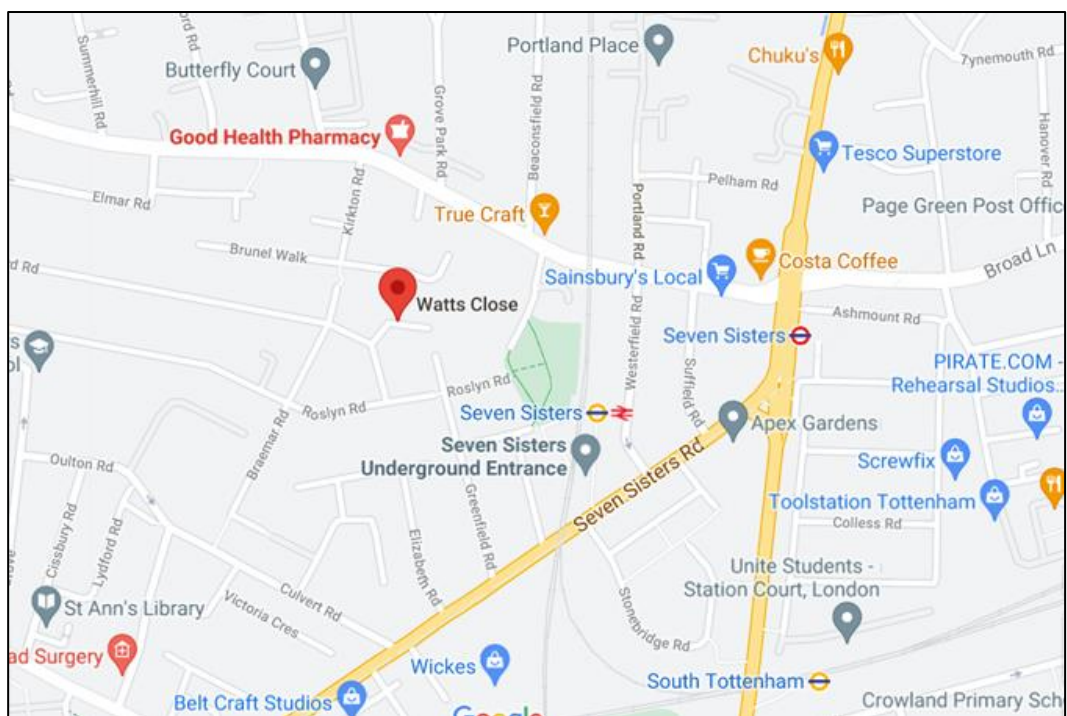
- 3.2 The surrounding area is residential in character accommodating a wide range of property types and styles including two and three-storey post-war Council developments to the

north on Lomond Close and more traditional two-storey housing to the south on Seaford Road and Greenfield Road.



Location map of site

- 3.3 The Public Transport Accessibility Level (PTAL) of the site is 4, regarded as 'good' albeit the properties adjacent to the east and south achieve a PTAL rating of 6a which indicates an 'excellent' accessibility to public transport. Seven Sisters Underground and National Rail Stations are located within walking distance to the east and south of the site and there are several bus-stops nearby on West Green Road and Seven Sisters Road nearby serving regular bus routes.



Wider location map of site

- 3.4 The local area offers a wide range of retail and commercial facilities centred along West Green Road to the north of and Seven Sisters Road to the south of the site, in addition to a good range of community related uses including nurseries, schools, leisure facilities and parks and open spaces. In respect to the latter these include Brunswick Park Open Space, 0.2 miles/3 mins walk to the east of the site.
- 3.5 The application site has no formal planning policy designations but lies within Flood Zone 1 and a Critical Drainage Area. There are no protected trees nor local or statutory listed buildings on-site or in the immediate area. The Clyde Circus Conservation Area is located approximately 100m to the north of the site, but this presents no implications for the development. The site is also located within Controlled Parking Zone (CPZ) 7S which is restricted to permit holders only on Monday to Saturday between 8.00am – 6.30pm.

4. HISTORY

Planning and development history

- 4.1 The site has no planning history of relevance to the current proposals. In terms of how the site has changed and developed overtime, the unusual shape and access to the site can be explained by the site's history with historic maps providing an explanation for the current site configuration.
- 4.2 The rows of terraced houses in the two streets immediately adjacent to the site on Seaford and Greenfield roads were originally interrupted by a railway line, which was operational until the early 1960s. In the case of Seaford Road, which ran broadly parallel with the railway line, development was interrupted, leaving a wide gap to the west of a track-side land, unsuitable for building identical speculative terraced houses. Housing development on Greenfield Road came to an abrupt end to the east of the same track-side land which during this period, seems to have been used for light industrial buildings.
- 4.3 After the dismantling of the railway, new housing on Lomond Close was developed, following the orientation of West Green Road and facing away from Seaford Road and Greenfield Road.
- 4.4 The eleven existing homes on Watts Close seem to have been fitted on the site to suit post-war prefab bungalow construction, but with little urban design consideration and poor connection and integration with the surrounding streets and buildings.

Pre-application engagement

- 4.5 Formal pre-application engagement has been undertaken with the Local Planning Authority (LPA) at the London Borough of Haringey (LBH). The application has been designed in response to the pre-application advice given including advice from the Quality Review Panel (QRP). Discussions have been ongoing throughout the development of the proposals and up until the submission of the application with Council Planning officers and officers from other relevant departments including Building Control, Public Health, Drainage, Waste Management and Transport.

Community and stakeholder engagement

- 4.6 The Applicant has liaised closely with Homes for Haringey and has consulted other key

stakeholders such as UKPN, given the adjoining sub-station. The proposals have also been subject to a community engagement exercise and Member briefings. These have informed and shaped the proposed development.

- 4.7 Full details of the engagement process are set out in the in the Statement of Community Involvement (SCI) and Design and Access Statement (DAS) that accompanies this submission.

5. PLANNING POLICY AND LEGISLATIVE OVERVIEW

Introduction

- 5.1 This Application has been informed by the adopted and emerging development plan policies and other relevant guidance. This section of the Statement provides a summary of the planning context, and the following sections provide an assessment of the application against the policies and guidance contained within these documents.

Statutory Framework

- 5.2 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. However, section 11 of the National Planning Policy Framework (2019) states that where the Development Plan is absent, silent or relevant policies are out of date, presumption should be in favour of sustainable development and planning permission should be granted, unless material considerations indicate otherwise.

National Planning Policy Framework (NPPF) - 2021

- 5.3 The revised National Planning Policy Framework (NPPF) was published in July 2021 and supersedes previous iterations. The Framework sets out the Government's approach to planning matters and is a material consideration in the determination of planning applications.
- 5.4 At the heart of the NPPF is a presumption in favour of sustainable development (paragraph 11) which is defined in paragraph 8 as incorporating economic, social and environmental objectives. The framework recognises the overwhelming need to accommodate and accelerate housing development and make more effective use of land and gives 'substantial weight' to the value of using suitable brownfield land for new homes. It emphasises that development proposals that accord with an up-to-date development plan should be approved without delay. Section 11 of the NPPF states that where the Development Plan is absent, silent or relevant policies are out of date, presumption should be in favour of sustainable development and planning permission should be granted, unless material considerations indicate otherwise.
- 5.5 The NPPF requires the efficient use of land in meeting the need for homes, making as much use as possible of brownfield land, and to consider whether it is desirable to maintain an area's prevailing character or promote change and regeneration. Decisions should not prevent or discourage appropriate innovation or change when they are well designed. Small to medium sized sites are to make an important contribution to meeting the housing requirement of an area and are often built out quickly. The NPPF promotes and supports the development of under-utilised buildings especially where the supply of land is constrained.

- 5.6 Paragraph 59 outlines that to support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.
- 5.7 Paragraph 68 discusses the important contribution that small and medium sites can play and the speed in which they can deliver additional dwellings. Part C) specifically supports the development of windfall sites stating that decisions should give 'great weight to the benefits of suitable sites within existing settlements for homes'.
- 5.8 Paragraph 118 specifically promotes the development of under-utilised land and buildings, 'especially where land supply is constrained, and available sites could be used more effectively'.
- 5.9 Paragraph 122 states that planning decisions should support the efficient use of land taking into account the needs for different types of housing, local market conditions, the capacity of local infrastructure and services, the desirability of maintaining an areas character or promoting its change and the importance of good design.
- 5.10 Paragraph 127 e) states that decisions should ensure that development optimises the potential of the site to accommodate and sustain an appropriate amount and mix of development.
- 5.11 The Development Plan for the Site comprises:
- The London Plan 2021 - Spatial Development Strategy for Greater London.
 - LBH Local Plan Strategic Policies 2013-2017 March 2013: Consolidated with alterations since 2017.
 - LBH Development Management Development Plan Document (2017) (DMDPD)
 - LBH Policies Map (2017).
- 5.12 The adopted development plan is supported by Supplementary Planning Documents (SPDs) and Supplementary Planning Guidance (SPG) at the regional and local level.
- 5.13 The Greater London Authority (GLA) has published a number of supporting documents that are relevant in the consideration of this Application. Of particular relevance are:
- Mayor's Affordable Housing & Viability SPG (2017);
 - Mayor's Housing SPG (2016);
 - Mayor's Sustainable Design and Construction SPD (2014);
 - Mayor's Shaping Neighbourhoods: Character and Context SPG (2014);
 - Mayor's Shaping Neighbourhoods: Play and Informal Recreation SPG (2012);
 - Mayor's London Environment Strategy (2018);
 - Mayor's Planning for Equality and Diversity in London SPG (2007);
 - Mayor's Accessible London: Achieving an Inclusive Environment SPG (2004);
 - Mayor's Energy Strategy and Mayor's Draft Energy Assessment Guidance (2020);
 - Mayor's Carbon Offset Funds Guidance (2018);
 - Mayor's Control of Dust and Emissions during Construction and Demolition SPG (2014); and
 - Mayor's Transport Strategy (2018).

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- The London Plan 2021 - Spatial Development Strategy for Greater London.
- LBH Local Plan Strategic Policies 2013-2017 March 2013: Consolidated with alterations since 2017.
- LBH Development Management Development Plan Document (2017) (DMDPD)
- LBH Policies Map (2017).

5.15 The adopted development plan is supported by Supplementary Planning Documents (SPDs) and Supplementary Planning Guidance (SPG) at the regional and local level.

5.16 The Greater London Authority (GLA) has published a number of supporting documents that are relevant in the consideration of this Application. Of particular relevance are:

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- Mayor's Shaping Neighbourhoods: Character and Context SPG (2014);
- Mayor's Shaping Neighbourhoods: Play and Informal Recreation SPG (2012);
- Mayor's London Environment Strategy (2018);
- Mayor's Planning for Equality and Diversity in London SPG (2007);
- Mayor's Accessible London: Achieving an Inclusive Environment SPG (2004);
- Mayor's Energy Strategy and Mayor's Draft Energy Assessment Guidance (2020);
- Mayor's Carbon Offset Funds Guidance (2018);
- Mayor's Control of Dust and Emissions during Construction and Demolition SPG (2014); and
- Mayor's Transport Strategy (2018).

5.17 At the local level, LBH has adopted a number of SPDs and Planning Policy Guidance Notes which are a material consideration in respect of the application. The documents of particular relevance in this instance are the following:

- LBH Planning Obligations SPD (2018); and
- LBH Sustainable Design and Construction (2013).

The London Plan 2021

5.18 The Plan is part of the statutory development plan for London, meaning that the policies in the Plan should inform decisions on planning applications across the capital. Borough's Local Plans must be in 'general conformity' with the London Plan, ensuring that the planning system for London operates in a joined-up way and reflects the overall strategy for how London can develop sustainably, which the London Plan sets out.

5.19 The following London Plan policies are of relevance to this application:

- **GG1** (Building strong and inclusive communities); **GG2** (Making the best use of land); **GG3** (Creating a healthy city); **GG4** (Delivering the homes Londoners need); **GG6** (Increasing efficiency and resilience); **Policy SD10** (Strategic and local regeneration); **Policy D1** (London's form, character and capacity for growth); **Policy D3** (Optimising site capacity through the design-led approach); **Policy D4** (Delivering good design);

Policy D5 (Inclusive design); **Policy D6** (Housing quality and standards); **Policy D7** (Accessible housing); **Policy D8** (Public realm); **Policy D11** (Safety, security and resilience to emergency); **Policy D12** (Fire safety); **Policy D14** (Noise); **Policy H1** (Increasing housing supply); **Policy H4** (Delivering affordable housing); **Policy H5** (Threshold approach to applications); **Policy H6** (Affordable housing tenure); **Policy H7** (Monitoring of affordable housing); **Policy H10** (Housing size mix); **Policy HC1** (Heritage conservation and growth); **Policy G1** (Green infrastructure); **Policy G4** (Open space); **Policy G5** (Urban greening); **Policy G6** (Biodiversity and access to nature); **Policy G7** (Trees and woodland); **Policy SI 1** (Improving air quality); **Policy SI 2** (Minimising greenhouse gas emissions); **Policy SI 4** (Managing heat risk); **Policy SI 5** (Water infrastructure); **Policy SI 7** (Reducing waste and supporting the circular economy); **Policy SI 10** (Aggregates); **Policy SI 12** (Flood risk management); **Policy SI 13** (Sustainable drainage); **Policy T1** (Strategic approach to transport); **Policy T2** (Healthy Streets); **Policy T3** (Transport capacity, connectivity and safeguarding); **Policy T4** (Assessing and mitigating transport impacts); **Policy T5** (Cycling); **Policy T6** (Car parking); **Policy T6.1** (Residential parking); **Policy T7** (Deliveries, servicing and construction).

- 5.20 It is worth noting that Policy H1 of the London Plan which relates to the supply of housing seeks to see a step change in delivery on all suitable sites. Haringey's annual housing target set out in Table 4.1 of the Plan is 1,958 dwellings, which represents a 30% increase from the current target of 1,502 dwellings per annum. The Planning Inspector had found fault with the overall strategy and proposed to cut this to 1,592 dwellings per annum, which still represents an increase on the previous target and shows the need for LB Haringey to find sites to accommodate increased housing growth. The Policy envisages that this step change will come from various sources but in particular areas with existing or planned PTAL 3-6, areas within 800m of a station or town centre boundary, and through small housing development.
- 5.21 It highlights that delivering more affordable housing is a key strategic issue for London and Policy H4 - Delivering affordable housing, requires the provision of more genuinely affordable housing. The Mayor expects that residential proposals on public land should deliver at least 50 per cent affordable housing on each site.
- 5.22 The London Plan advises that to accommodate the growth identified in an inclusive and responsible way every new development needs to make the most efficient use of land by optimising site capacity. Policy D3 - Optimising site capacity through the design-led approach, seeks to ensure the form of development is the most appropriate for a site and land uses meet identified needs. It emphasises a design-led approach to optimising site capacity should be based on an evaluation of the site's attributes, its surrounding context and its capacity for growth to determine the appropriate form of development for that site. Higher density developments should generally be promoted in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling.
- 5.23 The Mayor is committed to London becoming a zero-carbon city. Policy SI 2 - Minimising greenhouse gas emissions requires that Major development should be net zero-carbon. This means reducing greenhouse gas emissions in operation and minimising both annual and peak energy demand in accordance with the following energy hierarchy:
- 1) be lean: use less energy and manage demand during operation.
 - 2) be clean: exploit local energy resources (such as secondary heat) and supply energy efficiently and cleanly.

3) be green: maximise opportunities for renewable energy by producing, storing and using renewable energy on-site.

4) be seen: monitor, verify and report on energy performance.

The Policy highlights that Major development proposals should include a detailed energy strategy to demonstrate how the zero-carbon target will be met within the framework of the energy hierarchy. A minimum on-site reduction of at least 35 per cent beyond Building Regulations is required for major development. Residential development should achieve 10 per cent, and non-residential development should achieve 15 per cent through energy efficiency measures. Where it is clearly demonstrated that the zero-carbon target cannot be fully achieved on-site, any shortfall should be provided, in agreement with the borough, either via a cash in lieu contribution to the borough's carbon offset fund, or through an alternative off-site provision. Local Planning Policy

5.24 Local development plan policies for the site are contained within documents of the London Borough of Haringey's Local Plan. The main documents are the Strategic Policies Development Management Document (DPD), which sets out the long-term vision of how Haringey should develop by 2026 and the Council's strategy for achieving that vision, and Development Management DPD, which gives effect to the key objectives of Haringey's Strategic Policies by providing a clear framework for development and supporting proposals that contribute to the delivery of sustainable development. Both of documents were adopted in July 2017.

5.25 The following Local Plan policies Strategic are of relevance to this application:

- Strategic Policies DPD: **SP0** (Presumption in favour of sustainable development); **SP1** (Managing growth); **SP2** (Housing); **SP4** (Working towards a Low Carbon Haringey); **SP5** (Water Management and Flooding); **SP6** (Waste and recycling); **SP7** (Transport); **SP11** (Design); **SP12** (Conservation); **SP13** (Open space and biodiversity); **SP14** (Health and well-being).
- Development Management DPD: **Policy DM1** (Delivering high quality design); **Policy DM2** (Accessible and safe environments); **Policy DM3** (Public realm); **Policy DM4** (Provision and design of waste management facilities); **DM6** (Building heights); **Policy DM9** (Management of the Historic Environment); **Policy DM10** (Housing supply); **Policy DM11** (Housing mix); **Policy DM12** (Housing design and quality); **Policy DM13** (Affordable housing); **Policy DM19** (Nature Conservation); **Policy DM20** (Open space and green grid); **Policy DM21** (Sustainable design layout and construction); **Policy DM22** (Decentralised energy); **Policy DM23** (Environmental protection); **Policy DM24** (Managing and reducing flood risk); **Policy DM25** (Sustainable drainage systems); **Policy DM27** (Protecting and improving groundwater quality and quantity); **Policy DM28** (Protecting and enhancing watercourses and flood defences); **Policy DM29** (On-site management of waste water and water supply); **Policy DM31** (Sustainable transport); **Policy DM32** (Parking); **Policy DM33** (Crossovers, vehicular access and adopting roads); **Policy DM48** (Use of planning obligations); **Policy DM49** (Managing the provision and quality of community infrastructure).

5.26 It is noted that the Council is currently in the process of preparing a new Local Plan. Formal consultation ran from 16th November 2020 until 1st March 2021. Haringey Council now plan to consult on the revised Draft Local Plan later in 2021 before preparing and consulting on a Proposed Submission Local Plan. This will then be submitted for examination by an Independent Planning Inspector. The Plan is not material however to the determination of

this application given that it is at an early stage of production.

6. PLANNING ASSESSMENT

Introduction

6.1 This section provides an overview of main considerations in respect of the proposed development. It assesses the scheme against key adopted planning policy for the following elements:

- Principle of development
- Residential mix
- Housing tenure
- Quality of accommodation
- Design, townscape and heritage
- Landscaping/trees, public realm, amenity and play space
- Ecology
- Impact on neighbouring amenity
- Transport and parking
- Crime prevention
- Sustainability and energy
- Refuse and recycling
- Other environmental considerations:
 - Air quality
 - Noise
 - Flooding and drainage
 - Ground conditions and contamination
- Planning obligations

Principle of development

Policy context

- 6.2 Paragraph 68 of the NPPF notes that small and medium size sites can make an important contribution to meeting the housing requirement of an area and are often built out relatively quickly.
- 6.3 The NPPF advocates policy that seeks to significantly boost the supply of housing and also requires local planning authorities to ensure their Local Plan meets the full, objectively assessed housing needs for market and affordable housing. There is a specific requirement for local planning authorities to maintain a supply of deliverable sites sufficient to provide five years' worth of housing against their housing requirements with an additional buffer of 5% to ensure choice and competition in the market.
- 6.4 Policy H1 – Increasing housing supply in the London Plan, encourages Boroughs to meet their 10-year housing targets by optimising the potential for housing delivery on all suitable and available brownfield sites through their Development Plans and planning decisions, especially in respect to sites with existing or planned PTALs of 3-6 or which are located within 800m of a station or town centre boundary.
- 6.5 Policy G1 - Green infrastructure part A in the London Plan, states that London's network of green and open spaces, and green features in the built environment, should be protected

and enhanced. Green infrastructure should be planned, designed and managed in an integrated way to achieve multiple benefits. Part D of the policy goes on to say that development proposals should incorporate appropriate elements of green infrastructure that are integrated into London's wider green infrastructure network.

- 6.6 Policy SP2 – Housing in the Council's Strategic Policies DPD, revises the Borough's housing target to a minimum target per annum from 820 to 1,502 for the period 2015-2026.
- 6.7 Policy DM10 – Housing Supply of the Council's Development Management DPD, seeks to increase housing supply and seeks to optimise housing capacity on individual sites.
- 6.8 Policy DM49 - Managing the Provision and Quality of Community Infrastructure in the Council's Development Management DPD states:
- A The Council will seek to protect existing social and community facilities unless a replacement facility is provided which meets the needs of the community.
 - B Where a development proposal may result in the loss of a facility, evidence will be required to show that:
 - a The facility is no longer required in its current use;
 - b The loss would not result in a shortfall in provision of that use; and
 - c The existing facility is not viable in its current use and there is no demand for any other suitable community use on the site.
- 6.9 The Mayor of London and the Borough are keen to bring forward development which delivers high-quality affordable housing, optimises the use of previously developed land and maximises the benefits to the local community including the provision of good quality open space.

Assessment

- 6.10 The site is not covered by any specific planning policy designations.
- 6.11 The existing site is located in an established and accessible area and comprises 11 bungalows in use as Temporary Accommodation, a small disused community building and parking area which fall under the Council's ownership.
- 6.12 There are currently 28 residents occupying ten of the eleven bungalows on-site in temporary accommodation. The Applicant and the Council's Move-on Team are liaising closely with all the existing residents to ensure that appropriate alternative accommodation is provided.
- 6.13 The delivery of new affordable housing on this site will entail the removal of the community building, known as Lomond Hall and the implications of this have been considered carefully in the overall design approach adopted. The building is dedicated for use by tenants of Lomond Close but is not in good condition and has been unused for over three years due to a lack of demand.
- 6.14 Lomond Hall is a small community venue, containing kitchen and toilet facilities. It is currently in an unusable condition, with traces of asbestos, a partly collapsed ceiling, broken walls from anti-social behaviour and mold.
- 6.15 In July 2020, Homes for Haringey informed the Council's Housing Department that after an inspection of Lomond Hall and after discussions with the Chair of the Resident's Association,

known as the Lomond Close Residents Association in the HfH tenants constitution, that it had come to the decision that the hall was no longer fit for purpose and the cost of repair would be prohibitive.

- 6.16 A decision was sought from the Strategic Property team for the site to be considered as a potential development and the building was permanently closed. It was agreed the hall form part of a wider programme to deliver affordable homes at Council rent on site.
- 6.17 Between May and November 2021, the Applicant sought to understand the impact that the proposed removal of the community building would have for local residents and to identify alternative provision to meet the needs of this community. Discussions were held with the Chair of the Lomond Close Residents Association (as referred to in the HfH Tenants Constitution), the Council's Commissioning and Community Team, ward Councillors and the Homes for Haringey resident engagement division.
- 6.18 The Chair of the Lomond Hall Residents Association, the only active member of the Association explained that over the past few years the demand for the use of the hall has drastically diminished due to several factors including demographic change in the local area and changing means of engagement. The Chair highlighted that those who first resided in the area were now elderly and had moved into more suitable accommodation such as care or nursing homes. Also, a shift in the use of digital technology and communication, has meant that the need for residents to engage in person and participate in community activities on-site is limited and interest generally amongst tenants was low. The Chair considered that the facility was no longer required in its current use or if repaired and its loss would not result in a shortfall in provision locally.
- 6.19 The Commissioning and Community Team emphasised the Council's intention to support the cohesion and active engagement and involvement of residents in the community in addition to community facilities. They highlighted that enabling residents to access other local Council owned centres is in line with the proposed Commissioning Strategy which requires the Council to expand the opportunities for the community to use a wider range of Council accommodation and council buildings and support the Voluntary Community Sector (VCS).
- 6.20 The Council's commissioning approach is based on fitting demand around supply and more effectively using Council owned community related accommodation. This is to promote wellbeing, independence and community cohesion, working on a locality-based model which the new delivery approach to commissioning, health and social care.
- 6.21 The Commissioning and Community team suggested that the Lomond Hall Resident Association could use any of the nine existing community centres within walking and cycling distance of the site and that this be facilitated through the Homes for Haringey Community Engagement Team.
- 6.22 Following further engagement with the local community, the Applicant and HfH will be facilitating the use of alternative community space within the local area for residents to use as necessary. Having discussed options with the lead representative of the Lomond Close Resident Association, the Applicant will make funding available to residents for a period of up to 5 years to use the hall and associated facilities at the West Green Methodist Church on 182-184 West Green Road, approximately 12 minutes' walk away from the site. The funding will enable residents to meet up to four times each year in accordance with Tenants Constitution and will be managed by Homes for Haringey.

- 6.23 Paragraph 121 of the NPPF states that local planning authorities should take a positive approach to applications for alternative uses of land which are currently developed but not allocated for a specific purpose in plans, where this would help to meet identified development needs. The principle of residential use is therefore considered acceptable having regard to the current use and location of the site
- 6.24 The majority of site is in an area with a PTAL of 4 which is considered 'good' but part of the eastern side of the site sits within a PTAL of 6a which indicates an 'excellent' accessibility to public transport. In particular, the site is located within walking distance of Seven Sisters underground and overground stations, bus stops, shopping facilities and other local amenities including recreational open space. According to London Plan Policy H1 referenced above, this type of brownfield location is a key source of housing capacity.
- 6.25 The redevelopment of this site for a greater number of homes will contribute to the Borough's housing target for the period from 2015-2026 in accordance with Strategic Policy 2. This also aligns with the thrust of the London Plan which identifies a pressing need for more homes including affordable homes.
- 6.26 The proposed development has been designed to optimise the delivery high-quality affordable homes and spaces and to enhance the local environment having regard to neighbouring residential amenity and the character and appearance of the surrounding area. The approach has been based on a comprehensive analysis of the constraints and opportunities presented by the site and the nature of its immediate environs and the wider urban context.
- 6.27 The pre-application advice received from the Local Planning Authority confirms the principle of residential development is acceptable subject to all other material considerations.
- 6.28 The land at Watts Close is a brownfield location, close to sustainable transport connections in an established residential area and the principle of residential use in this location is supported by national, regional and local policy, which identify housing as a strategic need. The provision of 18 genuine affordable residential units will make an important contribution towards meeting Haringey's housing target and will assist in meeting much needed local housing need. As previously highlighted, the scheme will also deliver significant improvements to the environmental quality of the site will serve to enhance both the setting of the new development and the quality, functionality, safety and attractiveness of the surrounding area for existing and new residents. In addition, these changes will substantially enhance local biodiversity.

Residential mix

Policy context

- 6.29 London Plan Policy H10 - Housing size mix, states that schemes should generally consist of a range of unit sizes. To determine the appropriate mix of unit sizes in relation to the number of bedrooms for a scheme, it advises that applicants and decision-makers should have regard to a range of factors including 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 units 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.

- 6.30 While Strategic Housing Market Assessments cover the full range of needs between 2016 and 2041, the London Plan states that boroughs may wish to prioritise meeting the most urgent needs earlier in the Plan period, which may mean prioritising low-cost rented units of particular sizes.
- 6.31 For low-cost rent, Policy H10 advises that boroughs should provide guidance on the size of units required (by number of bedrooms) to ensure affordable housing meets identified needs. This guidance should take account of: 1) evidence of local housing needs, including the local housing register and the numbers and types of overcrowded and under-occupying households 2) other criteria set out in Part A, including the strategic and local requirement for affordable family accommodation 3) the impact of welfare reform 4) the cost of delivering larger units and the availability of grant.
- 6.32 Policy SP2 – Housing, of the Strategic Policies DPD, states that high quality new residential development in Haringey will be provided by ensuring that new development provides a range dwelling types and sizes to meet local housing requirements.
- 6.33 Policy DM11 – Housing mix, of the Development Management DPD requires new residential development, including mixed-use schemes, to provide a mix of housing giving regard to individual site circumstances, the need to optimise housing output and the need to achieve mixed and balanced communities. In particular, it requires residential mix to have regard to site circumstances, character of surrounds, constraints and scale of development.
- 6.34 Policy DM11 also outlines that the Council will apply the London Plan policies on residential density in accordance with Policy SP2 but expects the optimum housing potential of a site to be determined through a rigorous design-led approach.

Assessment

- 6.35 The breakdown of the proposed accommodation mix is as follows:

- 12 apartments (incl. 2 wheelchair homes)
- 6 houses

providing the following accommodation:

- 4 x one-bed two-person apartments incl. 2 wheelchair homes (22%)
- 8 x two-bed four-person apartments (45%)
- 6 x three-bed five-person houses (33%)

Total – 18 affordable Council rent homes.

- 6.36 The mix has been determined by the site's physical constraints and development opportunities, its location close to public transport facilities and local amenities, local housing need and viability.
- 6.37 The developable area of the application site is irregular in shape and presents a number of differing boundary conditions including neighbouring property and a sub-station. The form of the proposed development reflects the shape of the site to optimise the space available for a wide range affordable housing types and sizes. The layout of the development is efficiently planned to accommodate 1 and 2-bedroom apartments and 3-

bedroom family houses, including wheelchair adapted and accessible homes to meet local housing need. All dwellings are at least dual aspect, meet the required planning policy space requirements and provide useable and high-quality living spaces.

- 6.38 Having regard to the existing use of the site, neighbouring residential amenity and the varied nature of the surrounding townscape, the proposed development takes the opportunity to respond carefully to its context and optimise, in a considered way the quantum and mix of affordable accommodation.
- 6.39 The proposed development forms part of the Council's Housing Delivery Programme which seeks to optimise the provision of affordable accommodation for Council rent to meet local need. The Programme is part funded by the GLA and is informed by the Local Plan and the Council's corporate Housing Strategy. It aims to address the Council's housing waiting list through the provision of a wide range of housing typologies across all the sites identified, manage issues relating to the over and under occupation of the existing housing stock and ensure the effective use of public assets and funding.
- 6.40 The housing mix and density have been determined through a design-led approach which has secured an appropriate range of housing typologies on-site. The layout and scale of the proposed development and the nature of accommodation are delivered in direct response to a considered design solution having regard to the constraints and opportunities presented by the site.

Housing tenure

Policy context

- 6.41 The London Plan highlights that delivering more affordable housing is a key strategic issue for London and London Plan Policy H4 - Delivering affordable housing, requires the provision of more genuinely affordable housing. The Mayor expects that residential proposals on public land should deliver at least 50 per cent affordable housing on each site.
- 6.42 Local Plan policy SP2 - Housing, 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 minimum target including securing the provision of affordable housing.
- 6.43 Policy DM13 - Affordable housing, in Haringey's Development Management DPD 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.

Assessment

- 6.44 The proposed development provides accommodation for Council rent and forms part of the Council's Housing Delivery Programme which seeks to deliver new affordable housing across the Borough as referred to earlier. The Programme is part funded by the HRA and the GLA and aims to address the Council's housing waiting list through the provision of a wide range of housing typologies across all the sites identified, manage issues relating to the over and under occupation of the existing housing stock and ensure the effective use of public assets and funding.

- 6.45 The 18 proposed Council homes will make an important contribution to the provision of genuinely affordable homes within the Borough. It should also be noted that the site is located within an established residential area accommodating a significant range of tenures including private rent, owner-occupier and Council. The proposed development of 18 Council rented homes will therefore complement the balance of tenures across the local area and support the need for range of housing types to meet demand.

Quality of accommodation

Policy context

- 6.46 The Nationally Described Space Standards set out the minimum space requirements for new housing.
- 6.47 London Plan Policy D6 – Housing Quality and standards, states that housing development should be of high-quality design and provide adequately-sized rooms and storage space with comfortable and functional layouts which are fit for purpose and meet the needs of residents without differentiating between tenures. It emphasises that qualitative aspects of a development are key to ensuring successful sustainable housing and that housing development should maximise the provision of dual aspect dwellings and normally avoid the provision of single aspect dwellings. It requires that the design of development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context, whilst avoiding overheating, minimising overshadowing and maximising the usability of outside amenity space.
- 6.48 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.
- 6.49 Haringey Policy DM12 – Housing design and quality, of the Development Management DPD seeks all new housing and residential extensions to be of high quality, considering the privacy and amenity of neighbouring uses and requires the minimum national space and London Plan standards to be met.

Assessment

- 6.50 The proposed development has been designed having regard to local planning policy and guidance and generally complies with or exceeds the standards set out in the national and London Plan space standards and the Council’s own Housing Employer Requirements. The development secures the following standards and amenities:
- All dwellings achieve or exceed minimum space standards set by policy including external amenity space.
 - All dwellings achieve compliance with Building Regulations M4 (1), M4 (2) and 10% of units achieve M4 (3) compliance.
 - All dwellings are at least dual aspect.
 - All dwellings including external space receive good levels of sunlight/daylight.
 - All dwellings have a minimum floor to ceiling height of 2.5m.

- All dwellings are well laid out to provide useable living spaces to meet modern living arrangements.
- Sufficient space for storage is provided in each dwelling in accordance with policy.
- The development is designed to be sustainable with the proposed accommodation providing high levels of insulation, efficient means of heating and cooling, adequate levels of sunlight/daylight and ventilation.
- Sufficient space is provided for cycle parking and refuse/recycling storage in accordance with policy.
- Appropriate provision is made for children's play space.
- The development will achieve Secure By Design accreditation.
- High-quality landscaping including new surfacing, wider pavements, improved lighting, seating and appropriate planting.
- 19 new semi-mature trees new trees will be planted across the site.
- Car parking provision is made for two wheelchair accessible spaces on-site.

6.51 The position of each residential unit has been carefully considered in relation to boundary conditions, outlook, privacy, light and orientation to maximise the quality of the accommodation.

6.52 The Design and Access Statement accompanying the planning application sets out the approach taken to the design of the accommodation and related amenities and demonstrates these standards and benefits are delivered.

Design, townscape and heritage

Policy context

6.53 The NPPF states that good design is a key aspect of sustainable development indivisible from good planning and should contribute positively to making places better for people. Planning policies and decisions should not attempt to impose architectural styles of particular tastes and they should not stifle innovation, originality or initiative through unsubstantiated requirements to conform to certain development forms or styles. Paragraph 58 requires proposals to function well and add to the overall quality of the area, establish a strong sense of place, and respond to local character and history without stifling appropriate innovation. It also seeks visually attractive development and paragraph 60 sets out that decisions should seek architectural styles, innovation, originality and local distinctiveness.

6.54 The London Plan emphasises the importance of good design process and scrutiny. Policy D4 - Delivering good design, states that the design of development proposals should be thoroughly scrutinised by borough planning, urban design, and conservation officers. In addition, boroughs and applicants should make use of the design review process to assess and inform design options early in the planning process.

6.55 For residential development the London Plan states that it is particularly important to scrutinise the qualitative aspects of the development design described in Policy D6 - Housing quality and standards. The higher the density of a development the greater this scrutiny should be of the proposed built form, massing, site layout, external spaces, internal design and ongoing management. It goes on to say that this is important because these elements of the development come under more pressure as the density increases. The housing minimum

space standards set out in Policy D6 help ensure that as densities increase, quality of internal residential units is maintained.

- 6.56 Paragraph 3.6.1 of the London Plan states that ‘For London to accommodate growth in an inclusive and responsible way every new development needs to make the most efficient use of land. This will mean developing at densities above those of the surrounding area on most sites. The design of the development must optimise housing density. A design-led approach to optimising density should be based on an evaluation of the site’s attributes, its surrounding context and capacity for growth and the most appropriate development form, which are determined by following the process set out in Policy D2 Delivering good design. Policy H1 Increasing housing supply, Policy H2 Small sites and Policy H3 Monitoring housing targets set out requirements for increasing housing supply across London.’
- 6.57 The Mayor of London’s Housing SPG seeks to ensure that the layout and design of residential and mixed-use development provides a coherent, legible, inclusive and secure environment is achieved. It advises that, through scale, material, massing and building type, development should take account of the existing character and urban grain of a place and build on its positive elements.
- 6.58 Policy SP11 – Design, of the Councils’ Strategic Policies DPD states 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. To achieve this the Policy states that all development shall:
- Ensure impacts on health, climate change, natural resources and biodiversity are minimised by adopting and improving sustainable design and construction techniques;
 - Incorporate solutions to reduce crime and the fear of crime, such as promoting social inclusion; creating well-connected and high-quality public realm that is easy and safe to use; and by applying the principles set out in ‘Secured by Design’ and Safer Places;
 - Promote high quality landscaping on and off site, including improvements to existing streets and public spaces;
 - Seek the highest standards of access in all buildings and places; and
 - Ensure buildings are designed to be flexible and adaptable – and able to integrate services and functions.
- 6.59 Policy SP12 – Conservation, of the Council’s Strategic Policies DPD requires new development to conserve the historic significance of Haringey’s heritage assets and their settings.
- 6.60 Policy DM1 – Delivering high quality design, of the Development Management DPD states that all new development and changes of use must achieve a high standard of design and contribute to the distinctive character and amenity of the local area.
- 6.61 Policy DM6 – Building Heights, 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. For buildings projecting above the prevailing height of the surrounding area it will be necessary to justify them in urban design terms, meeting prescribed design requirements.
- 6.62 Policy DM9 - Management of the Historic Environment, states that development should sustain and enhance the significance of heritage assets.

Assessment

- 6.63 From the beginning of the development design process, the scheme has been led by these overarching policy design principles, to reflect the Council's design objectives for the redevelopment of the site. The design of the proposals has evolved as a result of an iterative design process and engagement with the Council, local stakeholders and the community. The proposals have been informed by a contextual analysis of the area and were considered and developed through pre-application engagement with the Local Planning Authority and the Quality Review Panel. The Design and Access Statement accompanying the planning application sets out the approach taken and the rationale behind the design of the proposed scheme.
- 6.64 The design of the proposed development seeks to optimise the potential of the site to deliver a range of high-quality affordable homes having regard to neighbouring residential amenity and the character and appearance of the surrounding area. The approach has been based on a comprehensive analysis of the constraints and opportunities presented by the site and the nature of its immediate environs and the wider urban context.
- 6.65 The application site and the surrounding area is residential in character accommodating a wide range of property types and styles including two and three-storey post-war Council developments to the north on Lomond Close and more traditional two-storey housing to the south on Seaford Road and Greenfield Road.
- 6.66 In seeking to make the most efficient use of the site and present an appropriate form of development appropriate to the area, a master-planning approach was taken which sought to consider the site in a comprehensive and ensure that good place-making was central to the design process. The proposed form of development has been considered having regard to both the site's immediate context and the wider built environment. The proposed layout seeks to improve the existing environment and urban grain and enhance the use, quality and safety of the area.
- 6.67 A number of layout and massing options were considered during the pre-application process in testing how any new buildings and spaces could be most effectively configured on-site to optimise the level of affordable accommodation and deliver high-quality external space whilst respecting and enhancing the surrounding residential area. These options were also carefully informed by research and studies covering matters such as open space provision, visual/townscape impact, sunlight/daylight and noise levels and advice received from the Local Planning Authority, including the Quality Review Panel.
- 6.68 The proposed 12 apartments are contained within three-storey buildings which bookend 4 of the proposed two-storey houses to form a linear block of development orientated west to east across the centre of the site and accessed from Seaford Road and Greenfield Road. The two other proposed house present a semi-detached pair sitting to the north and rear of this block accessed from Lomond Close. The proposed homes are at least dual aspect, incorporate storage and include terraces, balconies and/or gardens which comply with the relevant planning policy space standards. A communal amenity space including a children's play area is presented across the front of the main block to serve the dwellings in this part of the development.
- 6.69 The architectural treatment and materiality of the proposed development has been considered carefully alongside its form and massing throughout the design process. The

buildings will be constructed from high-quality masonry, and this has been critical to the overall design approach. The proposed apartments and houses adopt a simple, consistent, and complementary style. The architectural approach is completed with the use of carefully proportioned fenestration, stone headers and cills and brick detailing. The apartments incorporate carefully positioned and designed open metal balconies. This arrangement respects the scale of the different building typologies proposed and enhances their character and presence in the townscape. The simple and ordered articulation of the elevations are considered to appropriately complement the form and massing of the buildings.

- 6.70 A red brick has been selected which picks-up on the general materiality within the local area and assists in reinforcing the architectural approach across the development and tying the different buildings together. Additional brickwork detailing as previously mentioned, horizontal stonework banding, and appropriately designed and coloured metal panelling and railings will provide contrast and further visual interest to the building facades.
- 6.71 The layout, height, form and massing of the proposed development and its architectural treatment is critical in relation to how it fits into its immediate context and in relation to neighbouring property, but it is also important to consider how it appears within the wider urban setting. As previously highlighted and detailed in the Design and Access Statement (DAS), the surrounding context of the site is diverse ranging from traditional two-storey fine grain housing to larger post-war developments.
- 6.72 The nature of the wider area is also defined by a local Conservation Area designation, the Clyde Circus Conservation Area which located approximately 100m to the north of the site. The proposed development is not however visible from the Conservation Area and would not harm its character or appearance.
- 6.73 The proposed development has been considered carefully to ensure it respects the character and appearance of the surrounding area having regard to the relevant planning policy and guidance noted above. The proposed buildings respect the existing urban grain, the scale and design of neighbouring property and present active new street frontages and clear and legible spaces and communal amenity areas. The wider area features a variety of building types and styles and there are no strategic or locally protected views, conservation areas or statutory or local listed buildings in the vicinity of the site which will be harmed by the height or design of the proposed development.
- 6.74 The proposed development will assist in creating a noticeable sense of place and add interest to the streetscape, enhancing the function and legibility of the area. It will deliver a high-quality residential environment for the benefit of existing and future residents.
- 6.75 Given the benefits of the scheme, and the informed approach to height, bulk, massing and appearance, it is considered that the proposals accord with the key objectives of the London Plan and Local Plan.

Landscaping/trees, public realm, amenity and play space

Policy context

- 6.76 The application site comprises 11 bungalows and associated garden spaces, a parking area, footpath and a small community building within a cul-de-sac setting. It is not considered to present a high-quality piece of the urban environment, but it does provide an opportunity deliver new affordable homes and significantly enhance the character appearance of the local area for the benefit of existing and future residents.
- 6.77 London Plan Policy G4 - Open space, aims to “promote the creation of new areas of publicly-accessible open space” as well as “enhance open spaces to provide a wider range of benefits for Londoners”. Policy G5 - Urban greening, sets out that major development proposals need to contribute to the greening of London by including urban greening as a fundamental element of site and building design. Boroughs should develop an Urban Greening Factor (UGF) with a target score in the interim of 0.4 for predominantly residential developments.
- 6.78 London Plan Policy G6 - Biodiversity and access to nature, aims to manage impacts on biodiversity and aim to secure biodiversity net gain.
- 6.79 London Plan Policy S4 - Play and informal recreation, outlines the need to provide new play facilities as part of development proposals. It also states that at least 10m² of play space per child should be provided that: a) provides a stimulating environment; b) can be accessed safely from the street by children and young people independently; c) forms an integral part of the surrounding neighbourhood; d) incorporates trees and/or other forms of greenery; e) is overlooked to enable passive surveillance, and; f) is not segregated by tenure.
- 6.80 Haringey’s Local Plan Policy SP11: Design, aims to promote high quality landscaping on and off-site including improvements to existing streets and public spaces”.
- 6.81 Policy SP13: Open Space and Biodiversity, provides policy on the following: protecting and improving open space; providing opportunities for biodiversity and nature conservation (including green and brown roofs, green walls and bird and bat nesting/roosting opportunities); protection of existing trees and the planting of new trees where appropriate; and the provision of informal and formal play space to meet the minimum of 3m² per child, with the aspirational target of 10m² per child (as set out in the Mayor’s SPG Providing for Children’s and Young People’s Play and Informal Recreation).
- 6.82 Policy DM1 - Delivering High Quality Design of the Development Management DPD, requires proposals to demonstrate how landscape and planting are integrated into the development expects development proposals to respond to trees on or close to a site, whilst Policy DM21 of the expects proposals to maximise opportunities to enhance biodiversity on-site, including through appropriate landscaping, Sustainable Drainage Systems, living roofs and green walls.

Assessment

- 6.83 The application proposes the redevelopment provide new high-quality affordable housing. Having regard to the nature of the application site, the proposed scheme is considered to significantly improve the quality and appearance of the built environment. Together with a series of high-quality landscaping interventions, the development will enhance the visual

and residential amenity of the immediate area.

- 6.84 As part of developing a layout for the site, a comprehensive approach was taken to landscaping encompassing green amenity spaces and biodiversity. A number of key objectives have guided landscaping strategy including:
- Creating safe and legible routes.
 - Providing spaces for natural play and relaxation.
 - Substantial new planting including new trees.
 - Mitigate surface water accumulation with the addition of permeable paving
 - Enhance biodiversity.
 - Encouraging an active street scape by creating a safe and attractive areas to congregate with seating and lighting.
 - Provide a sense of place of place through the layout of the communal areas, surface and boundary treatments.
 - Provide convenient and secure refuse/recycling and cycling storage facilities.
- 6.85 The landscaping approach has been prepared alongside the SUDs and drainage strategy that also accompanies the application. The design of the proposed landscaping provides future proofing from climate change taking into consideration extremes of heat and an excess of wet weather. The provision of urban SUDs including permeable paving, soakaways and carefully selected planting will reduce surface run-off, improve storm water quality, increase useable amenity space and enhance visual amenity, improve local habitat and the micro-climate.
- 6.86 The majority of the existing trees located centrally on the site will need to be removed to facilitate the development. In total, sixteen trees and two tree groups will need to be removed. These are mainly relatively small trees such as domestic fruit trees, Sumac and Norway Maple that were growing in the gardens of the existing bungalows.
- 6.87 Nineteen new semi-mature trees will be planted in the central amenity space and in the rear gardens to mitigate the existing trees that will be removed. A combination of tree species is carefully selected, specified and appropriate for their location and future growth, particularly in relation to adjacent buildings. Many of the proposed trees are native, supporting local wildlife. 27 large feature shrubs (minimum 25L) are also proposed, including native and pollinator species to support local wildlife and enhance biodiversity.
- 6.88 An assessment of the Urban Greening Factor (UGF) has been undertaken, based on the surface cover types and areas within the application boundary. The proposal has an Urban Greening Factor of 0.52, which meets the London Plan target score of 0.4 for predominantly residential developments.
- 6.89 The proposed development introduces a range of affordable housing into the area including family sized homes. It is important that there are sufficient areas of play to cater for the associated increase in children. The provision of children's play space has been considered carefully as part of the layout for the site which seeks to balance the delivery of a wide range of accommodation and local amenity.
- 6.90 The site is within less than 200m (1–2-minute walk) of Brunswick Road Open Space, a Neighbourhood Playable Space with a playground and separate ball court and Youth Space, located in a green and attractive public space. The quickest route is via Greenfield Road and the journey can be made without crossing any roads. There is an additional green space immediately north-east of the site, comprising open lawn and tree planting. This is

currently only accessible to immediately adjacent properties on Lomond Close and Brunswick Road but presents an opportunity in the future to provide an informal recreation and play space for the two proposed houses on Lomond Close.

- 6.91 The proximity of an equipped play space and ballcourt suggests that play provision within the development should target younger children where play provision closer to proposed homes, in an overlooked and safe setting, is more important.
- 6.92 Based on the London Plan calculator, the proposed new homes generate a yield of 24 children. It is advised that 10sqm of play space is required per child, a total of 240sqm. The proposed scheme will provide 310m2 of play space within the central open space and rear communal gardens. This caters 'door-step' - type play space aimed at younger children in overlooked locations close to entrances to new homes.
- 6.93 This will be equipped with informal play elements and incorporate new planting including trees, seating, and lighting. The new areas will provide an opportunity for sociable interaction, overlooked play with additional vegetation, seating and promoting a feeling of safety and community.
- 6.94 The proposed houses on Lomond Close will not have access to the communal amenity and play space for security reasons but are provided with appropriately sized private gardens.
- 6.95 The proposed development presents a comprehensive landscaping scheme to ensure the setting of the new homes is attractive, green, and safe and complements and enhances the character and appearance of the surrounding area. New planting including trees, surfacing, seating and lighting will feature as part of the treatment of the site.

Ecology

Policy Context

- 6.96 At a national level, the NPPF states that the planning system should contribute to and enhance the natural and local environment (Paragraph 170-175).
- 6.97 London Plan Policy G6 relates to biodiversity and access to nature. Part D seeks to ensure that development proposals manage impacts on biodiversity and aim to secure net biodiversity gain. This should be 'informed by the best available ecological information and addressed from the start of the development process'. London Plan Policy G5 requires major developments to contribute to urban greening.

Assessment

- 6.98 A Preliminary Ecological Assessment prepared by the Environment Partnership which is submitted with this application was carried out to determine the presence of any important habitats or species which might be impacted by the proposed development. It concluded that the existing site is of negligible value to wildlife. The habitat surveys undertaken recorded no species of any significance, nor did they highlight any biodiversity feature of significance.
- 6.99 The ecological approach and soft landscape strategy is guided by the baseline ecology survey to ensure that all existing ecological assets are protected and opportunities for enhancement

are maximised. Consideration has been given to opportunities for rainwater harvesting and the introduction of hibernacula, bird-feeding stations, and artificial nest boxes.

- 6.100 The landscape proposals will overall actively help bring in more biodiversity through planting including green roofs and species to the site, such as bats and birds, by providing suitable nesting solutions.

Impact on neighbouring amenity

Policy context

- 6.101 The proposed development has been carefully designed having regard not only to the living conditions associated with the new accommodation but critically in relation to neighbouring residential amenity, and specifically in respect to safeguarding the outlook, privacy and light enjoyed by residents of adjoining property.
- 6.102 The NPPF states that good design is a key aspect of sustainable development indivisible from good planning and should contribute positively to making places better for people. The London Plan emphasises the importance of a robust design process to secure high-quality and responsive development.
- 6.103 The Mayor's Housing SPG, indicates that BRE guidelines on assessing daylight and sunlight should be applied sensitively to higher density development in London, particularly in central and urban settings, recognising the London Plan's strategic approach to optimise housing output and the need to accommodate additional housing supply in locations with good accessibility suitable for higher density development. Quantitative standards on daylight and sunlight should not be applied rigidly within built up urban areas, without carefully considering the location and context and standards experienced in broadly comparable housing typologies in London.
- 6.104 Policy DM1 - Delivering High Quality Design, of the Development Management DPD outlines that development proposals must ensure a high standard of privacy and amenity for the development users and neighbours. The Council will support proposals that:
- a. Provide appropriate sunlight, daylight and open aspects (including private amenity space where required) to all parts of the development and adjacent buildings and land;
 - b. Provide an appropriate amount of privacy to their residents and neighbouring properties to avoid overlooking and loss of privacy detrimental to the amenity of neighbouring residents and the residents of the development; and
 - c. Address issues of vibration, noise, fumes, odour, light pollution and microclimatic conditions likely to arise from the use and activities of the development.
- 6.105 Supporting paragraph 2.10 of the Development Management DPD, states that the design and layout of buildings must enable sufficient sunlight and daylight to penetrate into and between buildings and ensure that adjoining land or properties are protected from unacceptable overshadowing.
- 6.106 Policy DM12 – Housing Design and Quality, requires new housing to take account of the privacy of neighbouring uses.

Assessment

- 6.107 The position, distance and scale of the proposed development in relation to neighbouring buildings ensures that the outlook, privacy and level of sunlight/daylight enjoyed by existing residents will not be adversely affected.
- 6.108 The proposed buildings have been carefully sited and designed to fit into their context and to safeguard neighbouring residential amenity. The building lines are set away from the adjoining boundaries and the heights of the proposed buildings are kept at two and three-storeys to reflect existing buildings and to ensure levels of sunlight/daylight and privacy received by existing neighbouring is not detrimentally affected.
- 6.109 A sunlight/daylight assessment has been carried out and is submitted with the planning application which demonstrates adjoining property bounding the site will not be unduly affected by the proposed development in this regard.
- 6.110 The surrounding area accommodates a range of property types and styles including traditional Victorian terraced housing and multi-storey post-war Council blocks of flat and houses. The proposed buildings have been intentionally designed to present a domestic and contemporary appearance but make use of traditional high-quality materials such as brick to reflect the predominant materiality of the locality.

Crime prevention

Policy Context

- 6.111 London Plan Policy D3 - Optimising site capacity through the design-led approach, states that development proposal should achieve safe, secure and inclusive environments.
- 6.112 Policy SP11 – Design, of the Strategic Policies DPD, requires all development to incorporate solutions to reduce crime and the fear of crime by promoting social inclusion, creating well-connected and high-quality public realm that is easy and safe to use and apply ‘Secured by Design’ and Safer Places principles.
- 6.113 Policy DM2 – Accessible and safe environments, of the Development Management DPD, seeks to ensure that new developments have regard to the principles set out in ‘Secured by Design’.

Assessment

- 6.114 The Metropolitan Police have assisted the proposed scheme in relation to seeking to create a safer environment for the future residents of the development and wider community. A Metropolitan Police Constable and Designing Out Crime Officer was consulted, and the advice received has been adhered to in the design of the development.
- 6.115 The submitted Design and Access Statement provides information on the way the proposed development seeks to enhance security through the design of the buildings and treatment of the external spaces. The design has been influenced by the ‘Secure by Design’ principles and in doing so seeks to design out crime. The scheme improves the pedestrian routes through the site, introduces active residential frontages providing better natural surveillance, incorporates attractive, useable and high-quality useable external spaces and improved lighting and boundary treatments. The Applicant will also be exploring the provision of CCTV with HfH and the Metropolitan Police.

- 6.116 The Metropolitan Police were generally satisfied with the proposals and concluded the scheme would achieve a Secured by Design Silver Award accreditation. With additional detail provided at the technical stage, a Gold Award accreditation could be achieved. The proposal therefore will achieve a minimum standard of a SBD Silver Award, with the aspiration to achieve an SBD Gold Award.

Sustainability and energy

Policy Context

- 6.117 The proposed development is located within an accessible and established residential area. It also adopts a progressive approach in relation to sustainability and energy to ensure that the most viable and effective solution is delivered to reduce carbon emissions.
- 6.118 The NPPF establishes a presumption in favour of sustainable development. It requires development to contribute to the transition to a low carbon future, reduce energy consumption and contribute to and conserve the natural environment.
- 6.119 London Plan Policy SI 2 - 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.
- 6.120 Local Plan Policy SP4 - Working towards a Low Carbon Haringey, of the Strategic Policies DPD 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. Policy SP11 - Design, requires all development to adopt sustainable design and construction techniques to minimise impacts on climate change and natural resources.
- 6.121 Policy DM1 - Delivering High Quality Design, of the Development Management DPD states that the Council will support design-led proposals that incorporate sustainable design and construction principles. Policy DM21 - Sustainable Design, Layout and Construction, expects new development to consider and implement sustainable design, layout and construction techniques. Proposals should minimise energy use, limit the potential for overheating and therefore reliance on mechanical air conditioning systems, where possible use building materials with high environmental performance ratings and seek locally sourced labour.

Assessment

- 6.122 An Energy and Sustainability Statement accompanying the application, demonstrates that careful consideration has been given to sustainable design principles throughout the evolution of the proposed development. The proposed buildings are designed to minimise their environmental impact through various means and make the fullest contribution to minimising carbon dioxide emissions in line with the prescribed energy hierarchy.
- 6.123 The scheme achieves a total carbon emissions saving of 111.06% according to this criterion. Using the more ambitious targets of SAP10, the carbon reduction will be 105.62%, to fulfil the future requirements over and above stated in the local development framework.
- 6.124 The development employs an efficient building fabric, including well insulated walls and

highly efficient glazing and incorporates air source heat pumps and PV Panels to maximise carbon savings for the site.

- 6.125 Green roofs and Sustainable drainage (SUDS) further contribute to the sustainability and biodiversity on the site, while low-energy appliances and water conserving sanitaryware contribute to energy efficiency in the new homes.
- 6.126 An Overheating Assessment has been undertaken to minimise the risk of overheating within the proposed development and to reduce reliance on air conditioning. In line with the Cooling Hierarchy outlined within the London Plan, a number of measures to minimise the risk of heating have been employed within the proposed development. These measures include the provision of fenestration that minimises solar heat gain whilst optimising daylight penetration, the specification of energy efficient and low-temperature systems, and the provision of openable windows supported by mechanical ventilation with heat recovery to deliver fresh air to the dwellings. Dynamic thermal modelling has also been carried out for the proposed development, which demonstrates that the risk of overheating within the proposed scheme has been mitigated for the current (2020s) time frame.
- 6.127 Overall, the proposed development has been designed to be in line with the policies set out in the London Plan and the London Borough of Haringey Local Plan in respect to sustainability and energy performance.

Transport and parking

Policy context

- 6.128 The proposed development seeks to deliver new affordable housing in an accessible and established residential area. The scheme provides improved pedestrian connectivity across the site and to the surrounding area and it is intended to be car-free by limiting the ability of new residents from applying for parking permits. This approach of restricting permits however, may be subject to change depending on further consideration by the Local Planning Authority. The proposals also will incorporate a range of sustainable travel planning measures including secure cycle storage facilities and car-club and sharing arrangements.
- 6.129 The NPPF notes that all developments that generate significant amounts of movement should be supported by a Transport Statement or Transport Assessment. It also highlights that transport strategies need to be considered and should be balanced in favour of sustainable transport modes, for movement of goods or people.
- 6.130 Paragraph 109 of the NPPF states: "Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe." It continues in Paragraph 110 "within this context, applications for development should: Give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use".
- 6.131 London Plan Policy T1 - Strategic approach to transport, sets out the Mayor's strategic target for 80 per cent 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.

- 6.132 Policy DM31 – Sustainable transport, of the Development Management DPD, requires development with high trip generations to be located where public transport accessibility is high and car parking is minimised. The Council will also require the submission of a Travel Plan and a Transport Assessment/Statement in support of development proposals in accordance with the Transport for London thresholds.
- 6.133 Policy DM32 – Parking, of the Development Management DPD relates to parking and states that development proposals will be assessed against parking standards (both car and cycling) in the London Plan. The use of car club schemes as an alternative to on-site car parking is encouraged and proposals for development with limited or no on-site parking will be supported subject to meeting the following:
- a. There are alternative and accessible means of transport available;
 - b. Public transport accessibility is at least 4 as defined in the Public Transport Accessibility Index;
 - c. A Controlled Parking Zone (CPZ) exists or will be provided prior to the occupation of the development;
 - d. Parking is provided for disabled people; and
 - e. Parking is designated for occupiers of developments specified as car capped.
- 6.134 Policy DM33 – Crossovers, vehicular access and adopting roads, sets out the requirements for new vehicular access to be supported. It states that any proposal should not result in: a reduction in pedestrian or highway safety; a reduction of on-street parking capacity within a CPZ; or, a visual intrusion to the street scene.

Assessment

- 6.135 The site has a PTAL of 4, considered good and is located within easy reach of public transport facilities and a wide range of local amenities.
- 6.136 A Transport Assessment including an Outline Travel Plan has been prepared in support of the application. The Transport Assessment sets out the impacts of the proposed development in respect to the highway and parking implications of the development and mitigating circumstances/measures.
- 6.137 The Local Plan and London Plan set out that residential developments in PTAL 4 and 5 areas should be car free. The proposed development is located within a PTAL 4 area and will provide two wheelchair accessible parking spaces on-site parking.
- 6.138 Cycle parking arrangements for the proposed development are in accordance with planning policy requirements. All the apartment and houses will provide secure cycle storage including visitor cycle parking.
- 6.139 A Travel Plan forms part of the planning submission and residents will be encouraged to travel by more sustainable means having regard to the site's accessible location. Residents will also be able to take up 'free' car club membership.

- 6.140 Since the proposed development will not have a significant impact on the highway network and will not lead to any unacceptable safety risks, the development is considered to present a highly sustainable solution to long-term residential travel arrangements.

Refuse and recycling

Policy Context

- 6.141 Policy D6 - Housing quality and standards, of the London Plan requires suitable waste and recycling storage facilities in all new developments.
- 6.142 Policy SP6 – Waste and recycling, of the Strategic Policies DPD requires well designed recycling facilities to be integrated into all new developments.
- 6.143 Policy DM4 – Provision and design of waste management facilities, of the Development Management DPD requires all proposals to make on-site provision for general waste and separate recycling provision. Consideration should also be given to the sustainable management of waste during design, construction and occupation of development.
- 6.144 Further guidance of waste and refuse is set out in Haringey's Sustainable Design SPD and its Waste Management Services guidance note.

Assessment

- 6.145 The waste storage arrangements are set out in the Design and Access Statement and Transport Assessment submitted with the application.
- 6.146 Provision will be made for residents to separate their refuse and recycling within each unit, with food waste also stored separately. The proposed apartments and houses will have appropriate refuse/recycling bins inco whilst there are
- 6.147 Refuse collection arrangements are considered satisfactory including refuse/recycling carry and pulling distances and refuse vehicular access.
- 6.148 The waste storage and collection arrangements accordingly meet with the relevant local planning policy requirements and guidance.

Other environmental considerations

- 6.149 At all policy levels there is a requirement to prevent unacceptable harm to amenity arising from new development. Paragraph 170 of the NPPF seeks to prevent new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution.
- 6.150 This section briefly reviews the following environmental issues in relation to the proposed development:
- Air Quality
 - Noise
 - Flood Risk and drainage
 - Ground Conditions and Contamination

Air quality

- 6.150 The Council seeks to improve air quality across the borough. Local Plan Policy DM23 - Environmental Protection, of the Development Management 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.
- 6.151 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 not conflict with national or local planning policies.

Noise

- 6.152 The NPPF states, in paragraph 180, that new development should mitigate and reduce to minimum potential adverse impacts resulting from noise and avoid noise giving rise to significant adverse impacts on health and the quality of life.
- 6.153 Local Plan Policy DM23 - Environmental Protection, of the Development Management DPD states 'the Council will seek to ensure that new noise sensitive development is located away from existing or planned sources of noise pollution. Proposals for potentially noisy development must suitably demonstrate that measures will be implemented to mitigate its impact.'
- 6.154 The proposals have been designed to ensure that there is no unacceptable impact on the amenity of surrounding properties or future residents of the development in relation to noise. The application is accompanied by an Acoustic Report, which concludes that appropriate internal and external noise levels can be achieved and that the site is therefore suitable for residential development.
- 6.155 In accordance with the recommendations of the Acoustic Report, the development incorporates double glazing and trickle vents with heat recovery systems to mitigate should residents not wish to open windows during the daytime to provide ventilation.

Flood risk and drainage

- 6.156 Local Plan Policies SP5 - Water Management and Flooding (Strategic Policies DPD) and DM24
- 6.157 Managing and Reducing Flood Risk (Development Policies DPD), seek to ensure that new development reduces the risk of flooding and provide suitable measures for drainage.
- 6.158 A Flood Risk Assessment and Drainage Strategy has been carried out for the site which highlights it as being in a Flood Zone 1 and concludes that the risk of flooding is low. It demonstrates that the effect of the proposed development on off-site flood risk is also low and that there is decrease of surface water run-off rates and run-off volume as a result of the development.
- 6.159 The Drainage Strategy highlights that the provision of landscaping, trees, permeable surfaces and green roofs can provide benefits in terms of reducing peak flow rates to the

site drainage system for small and medium-sized events, as well as biodiversity benefits.

Ground conditions and contamination

- 6.160 Policy DM23 – Environmental protection, of Development Management DPD requires proposals to demonstrate that any risks associated with land contamination can be adequately addressed to make the development safe.
- 6.161 A Phase 1 – Land Contamination Assessment has been carried out and accompanies the application submission. The Assessment concludes from a review of the relevant findings, that the proposed site is likely to be suitable for a residential development, subject to the completion of a Phase 2 investigation and any subsequent recommended remedial works that may be required for the proposed end use. Phase 2 investigation works and if required remedial works, typically form part of the planning conditions for discharge.

7 CIL AND PLANNING OBLIGATIONS

Community Infrastructure Levy (CIL)

- 7.1 The Mayoral CIL 2 (MCIL2) Charging Schedule came into effect on 1 April 2019 and applies to all developments across all London Boroughs where applications propose new build floorspace greater than 100 square metres. For LBH, the charging rate is set at £60 per square metre across all uses.
- 7.2 LBH implemented their CIL Charging Schedule in November 2014 and the CIL Rate Summary (2021) sets a rate of £20.96 per square metre for residential (Use Class C3) which falls in the 'Western' Zone. Office and retail uses do not currently require a contribution to be made.
- 7.3 LBH have undertaken a Partial Review and recommended that the rate be increased to £50 per sqm for the East. We understand that this figure is to be adopted in within the next year.
- 7.4 The proposed development is liable for both Local CIL and Mayoral CIL. It is also however potentially exempt given it proposes a fully affordable housing scheme.

Planning obligations

- 7.5 Regulation 122 (Limitation on use of planning obligations) states that a planning obligation may only constitute a reason for granting planning permission for the development if the obligation is necessary to make the development acceptable in planning terms, directly related to the development and fairly and reasonably related in scale and kind to the development.
- 7.6 Paragraph 54 of the NPPF (2019) states that local planning authorities should consider whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations. Planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition. Paragraph 55 explains that planning conditions should be kept to a minimum and only imposed where they are necessary, relevant to planning and to the development to be permitted, enforceable, precise and reasonable in all other respects.
- 7.7 The LBH Section 106 SPD (2018) sets out the Council's approach to the use of Section 106

Planning Obligations following the introduction of Regulation 122 and 123 of the Community Infrastructure Levy Regulations 2010. Subject to conformity with Regulations 122 and 123, and further negotiations, planning obligations may be sought, and the applicant is willing to enter into discussions with the Local Planning Authority as necessary.

- 7.8 As the Council is also the applicant in this instance, it is unable to enter into a Section 106 Agreement with itself and therefore it is proposed instead that an alternative agreement is prepared that will include the relevant planning obligations including financial contributions. Having regard to the policy framework and related guidance, it is proposed that this agreement will contain planning obligations including financial contributions in relation to the following key matters:

- Provision of Affordable Housing.
- Travel Plan.
- Construction Management.
- Car-free provision.
- Energy Plan.
- Carbon off-setting.
- Employment and Skills.
- Off-site landscaping works.
- Highway works.
- Monitoring and implementation.

- 7.9 The negotiation of the above detailed obligations will have regard to all relevant site-specific constraints and considerations, any CIL liability and the overall viability of the development. A draft Unilateral Undertaking has been submitted with the planning application. The suggested topics are provided on a without prejudice basis.

8 CONCLUSIONS

- 8.0 The proposed development will comprehensively transform an under-used brownfield site to deliver much needed high-quality affordable housing and significant local environmental improvements.
- 8.1 The proposed development has benefited from pre-application meetings with LB Haringey Planning Department and other Council departments and has been developed following pre-application consultation and engagement with the local community and advice received from the Quality Review Panel.
- 8.2 The proposals have been designed having regard to the location, nature and constraints of the site, the character and appearance of the surrounding area and neighbouring amenity.
- 8.3 The scheme is well planned, carefully designed and sympathetic to its context. It optimises the potential of the site for a wide range of affordable housing and creates an attractive, safe, inclusive and accessible new residential environment, in accordance with policy at all levels.
- 8.4 On the basis of the above, this Planning Statement, together with the supporting technical documents and reports, have demonstrated that this high-quality scheme is acceptable and sustainable development in accordance with the NPPF, London Plan and Local Plan.

- 8.5 The Applicant therefore respectfully requests that planning permission is granted on the basis that the proposed development accords with the Development Plan and other relevant material considerations that weigh in favour of this planning proposal to deliver 18 new affordable homes.

