

Planning Sub Committee – 10 January 2022

ADDENDUM REPORT FOR ITEMS

UPDATE FOR CONSIDERATION AT PLANNING SUB-COMMITTEE Item No. 3

Reference No: HGY/2021/2882	Ward: Seven Sisters
Address: Land adjoining Remington Road and Pulford Road London N15	
Proposal: Redevelopment of site including demolition of garages to provide 46 new homes for Council rent (Use Class C3) comprising part 3, 5 and 6 storey apartment buildings (31 homes) and 1, 2 and 3 storey houses and maisonettes (15 homes) with associated amenity space, landscaping, refuse/ recycling and cycle storage facilities. Reconfiguration of Remington Road as one-way street, 7 on-street parking spaces, children's play space, public realm improvements and relocation of existing refuse/recycling facilities.	
Applicant: LBH Haringey	
Ownership: Council	

Corrected occupancy - section 3.2

4 x four-bed six-person units (9%)

To clarify, the 15 townhouses include 4 maisonettes and 11 townhouses. This comprises a significant portion of family size homes.

There is no part of the development at 4 storeys which requires for the following:

Corrected section 3.4

The proposed buildings would be a mix of 2-storey townhouses and taller buildings of 3, 4, 5 and 6 storeys in height.

Corrected section 6.2.30

To the north-east, 4, 2- and 3-storey maisonette properties are designed against the railway embankment and adjacent an existing sub-station on open land which forms a turning head at the end of Pulford Road.

Corrected section 6.4.14

The (4, 2, 3-storey) maisonette properties are designed against the railway

embankment and adjacent an existing sub-station on open land which forms a turning head at the end of Pulford Road.

Section 5.4 clarification that support is from Cllr Blake

The following Councillor made representations:

Cllr Barbara J Blake (Support)

Appendix 1: Conditions

Clarification on the number of trees to be provided. Condition 18-

d. Those new trees (*which shall be no less than 63*) and shrubs to be planted together with a schedule of species shall be submitted to, and approved in writing by, the Local Planning Authority prior to the commencement of the development.

Appendix 2: Internal consultation

LBH Trees officer:

I have reviewed the application, including the Arb report. It is proposed to remove 15 trees which are predominantly categorised as 'C' in accordance with BS 5837. These are trees of low quality and value and as such should not be an impediment to development. A small number of category B trees are also proposed for removal. To mitigate for the loss of existing canopy cover, the new landscaping plan proposes the planting of 63 new trees, including both native and ornamental species. The new trees will increase local canopy cover and provide a much more diverse tree resource for the area. This will increase biodiversity, improve the local environment and enhance the quality of life for existing and future residents.

Appendix 3: Neighbour Representations Update

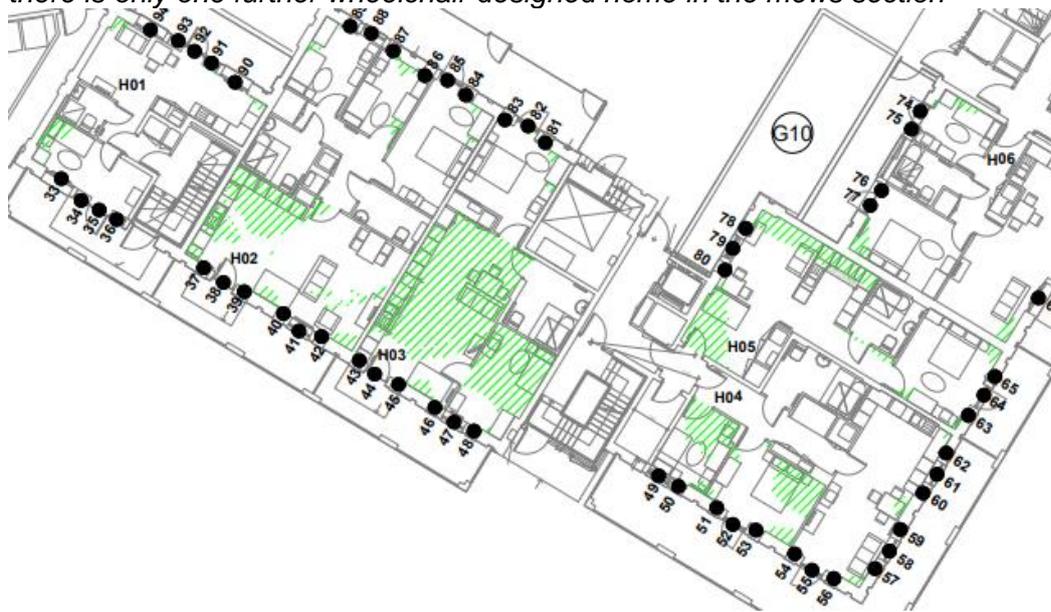
Response by applicant to objection received on 1st January 2022 by J Grant, 1 Rycroft Way:

1. Objector's comments and responses (responses in blue from the applicant team)

Unequal treatment of disabled residents

While overall the development is able to meet the standards of light on balance, the units which have been designed for wheelchair users are much more likely to fail to meet the standards. Particularly H03 which is a two bedroom home has the entire living area and one of the bedrooms as areas which won't receive any direct sunlight. None of the gardens receive direct sunlight either. Anyone living in a home that doesn't get sunlight is bad but particularly people with disabilities who are both less mobile and more likely to have depression and anxiety

Map of areas that receive no direct sunlight, H02-H05 are wheelchair designated homes, there is only one further wheelchair designated home in the mews section



- The wheelchair homes are placed at ground level for accessibility. It has its own entrance, amenity spaces to the front, and the rear is its dual aspect and is 71sqm. 10sqm larger than national housing standard requirements.
- The proposal achieves 96% compliance overall for internal daylight and sunlight in all habitable rooms, which is very high for an urban area.
- The wheelchair homes are open plan living and kitchen rather than an enclosed kitchen so that it is more useable for a wheelchair user. This makes the room deeper.
- With an enclosed kitchen, the rooms would comply to BRE standards for internal daylight.

While the majority of the pavement areas within the site do meet the minimum standard of 2m width predominantly the areas that fail to meet this standard are clustered around the wheelchair designed homes and disabled parking. Shown on map on following page.



Also the disabled parking is all under trees which present specific difficulties to disabled residents through leaf and branch fall and location should be reconsidered.

The pavements meet The Department of Transport (DfT) guidance for Inclusive Mobility which states the following for the widths of streets:

- For two wheelchairs to pass is ideally 2000mm.
- A minimum of 1500mm for two wheelchair passing is acceptable in most instances.
- For one wheelchair is a minimum width is 1000mm.

The proposal the DfT guidance

Failure to meet the Urban Green factor

Even by the calculations offered by the applicant the project sits at 0.396316726, below the mayor's target of 0.40, which has been manually rounded up by the applicant in the provided spreadsheet.

- The UGF spreadsheet supplied by the GLA automatically rounds this figure up.
- 0.40 is a target figure, not a requirement.

I have further concerns on how the calculation made for the urban greening factor was reached, with a number of category errors that inflate its score;

-inclusion of softplay area, permeable hard surface, into semi natural vegetation category

All soft play areas are included in the category of permeable paving (as the soft play surface consists of a 'surface wetpour' which is permeable) or into semi-natural vegetation. The play areas included within the category of semi-natural vegetation consist of species-rich grassland. The category of permeable hard surface is not included in the semi-natural vegetation category but can be found under 'permeable paving'.

-inclusion of amenity grassland in semi natural vegetation category, the Urban green factor is clear that irregardless of the species grass that is kept at a low enough level to allow for play, as is intended on numerous areas on this site, should be categorized as amenity grassland and not semi-natural vegetation

The areas for category semi-natural vegetation have all been included as the landscaped design is proposing species-rich grassland, which, in some instances, allows for doorstep play too. These areas will be constructed and maintained to the standards of semi-natural vegetation.

-inclusion of access hatches and machinery (I'm not including solar panels which are permitted for inclusion in category) into extensive green roof category

The roof plant equipment sits on top of a green roof usable to lay under solar panels and plant equipment. Therefore, this area can be included in the calculations.

If the mistakes in calculation I outline above are corrected the project will fall drastically below the Urban greening factor, how could it not? At its heart it is replacing a small park with a block of flats

0.4 UGF is achieved based on the GLA measurement criteria.

Loss of green park space

The site currently is 52% public green open space- 2940m²
Its 38% pavements, roads and parking spaces- 2151m²

Following the development the amount of the site that would be paving, roads and parking spaces would rise to 42%- 2312m² but the amount of public green open space would drop to 507m², 9%.

It is a target within Haringey council drafted green and open spaces strategy to increase the amount of pocket parks within the borough by 250m² per year, the loss of public park space on this single site would be the equivalent of 10 years of meeting that borough wide target.

The applicant was advised by the QRP to explore options to keep a bulk of the park space and the bulk of new housing units by keeping the development to the line of pre-existing housing on the site and one of the justifications for rejecting this sensible compromise between competing priorities of the council was that the design lead to 'reduced public space'

An option was explored to retain some of the open space with a linear block as requested by the QRP. However, this option was discounted for the following reasons:

- Habitable rooms are due north facing on one side of the block.
- Proximity to Network Rail's boundary.
- Small communal amenity to Network Rail's boundary.
- 11 fewer homes.

Through our S105 consultation process, 671 households were consulted who live close to the proposed site to inquire if they use the open space.

In summary:

- Only 17 use the open space.
- Only four use the open space on a daily basis.

At the statutory consultation, there were no objections from households who live in the immediate area.

Play space

The applicant is introducing play space but doesn't take existing residents into account when calculating the requirements for children playspace, despite them also being council homes and having the same needs, particularly as of the 38 responses they received from tenants and leaseholders 17 said they used the green space, which if representative of the 670 households on the estate would be considerably more numerous than the 46 new units. Of the proposed 898m² of proposed child play space the largest bulk of it comes from the south LEAP (524m²), which is created by improving existing green space incorporated into a play area.

The second largest LEAP (250m) is also for the most part currently an amenity space for the existing tenants. The existing tenants and units should be included in the calculation for playspace if they are losing a significant amenity to the proposed development and the sites being proposed to meet the child play space requirement will be spaces they will share with the new tenants. Only 124m² of LEAP won't be shared space with existing tenants.

In the application there doesn't seem to be much at all separating their proposed LEAPs from the current site- the largest of the LEAP is the proposed addition to Moreton road with the majority of the site taken up with 'informal play areas' with a 'meandering path' is grasslands with a hard surface path, this is both what is already present in the parkspace on Remington road but also what is offered on the site of the proposed LEAP now, yet this is counted as new for the purposes of this project?

The proposed play space provision meets the requirements of the London Plan in terms of size, type of play and travel distances.

Please note the following:

- The development is required to provide additional LAPs (i.e. non-equipped play area) not LEAPs (i.e. equipped play area) for the proposal.
- Calculations of LAPs are based on the London Plan, child yield calculator.
- Total LAP space provided = 898sqm, which exceeds the required play space area by 343sqm.
- This includes enhancements to a grass area at the corner of Pulford and Morton Road.
- We are not required to calculate existing children. However, we have provided 343sqm additional LAP areas and significant improvements to the public realm.
- The existing LEAP at the corner of Pulford and Morton Road at the corner of Pulford and Morton Road is retained.

Photos of the site May 2012



The applicant might claim that these aren't designated spaces but they are clearly amenity recreational areas intended for the existing council estate.

Also, I have been unable to confirm if this statement from a resident is correct but feedback received by the council from a resident claims that this site was created by a train crash that killed residents in the homes that existed on the site in the 50s, and that the council promised residents they wouldn't build on the site due to those deaths. If this is the case anywhere but a council estate this would be considered a memorial garden.

Representation	Applicant response
<p>If you are talking about the land by the bridge. In the fifties a train came off the tracks and rolled down the bank into the street. The Council gave the families assurance that the ground would not be built on. So many people lost loved ones and it was the people in the street houses that spent five days to dig them out. So are you saying the Council are going back on their word.</p> <p>Don't let the promise the Council made to the dead be broken.</p>	<p>The proposed development has been designed having regard to the constraints and opportunities presented by the site and local housing need.</p> <p>It is not uncommon for new residential development to be located close to railway lines; however, the proximity of the railway in this instance has been considered in consultation with the rail operators and the site is not considered inappropriate for residential purposes. Should the planning application be approved, further engagement with the rail operators will take place to ensure the development is compliant with the appropriate regulations.</p>

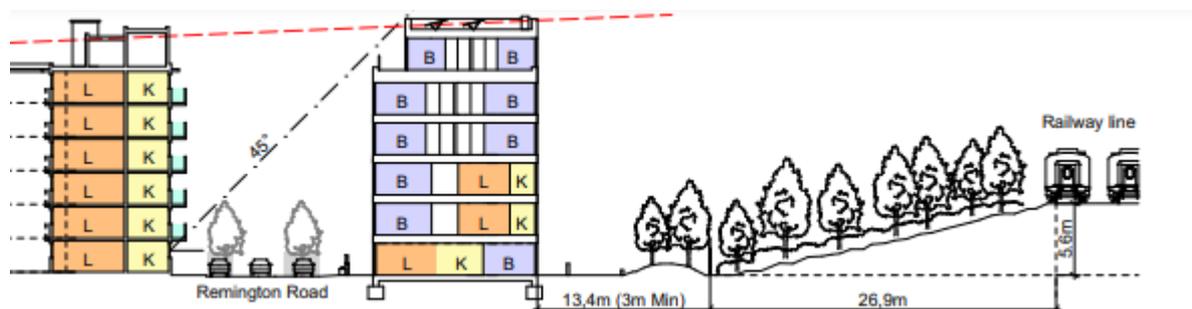
Through the S105 consultation process, 671 households were consulted who live close to the proposed site to inquire if they use the open space.
In summary:

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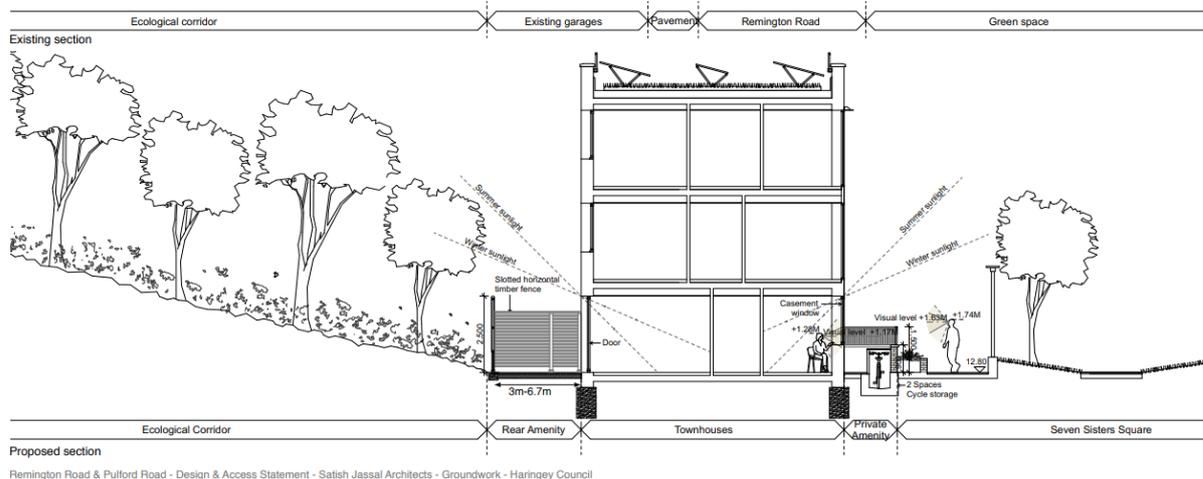
At the statutory consultation, there were no objections from households who live in the immediate area.

Overlooking, access and light

One concern with the daylight and sunlight report produced is that as standard they don't include trees in its analysis of light levels, while this raises concerns for the disabled residents who will already face low or no level of sunlight outlines above as there will be trees introduced outside of their home at the front and rear (x amount of trees added to rear communal garden) and this dense tree growth should have been analysed in the daylight and sunlight report)



However this decision was particularly inappropriate at the rear of the townhouses



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These face out towards the slope of the railway line and face a thick forest of trees which rises to 3 stories above them. As show on the diagram above, only during the height of summer would light reach the ground floor windows of the homes, and the gardens would never receive direct sunlight. In the Townhouse type TH.C this ground floor room would be the dining/living room and would receive no through light from the front of the house due to internal walls, leaving the main living space of the homes receiving sunlight only on rare occasions in summer.

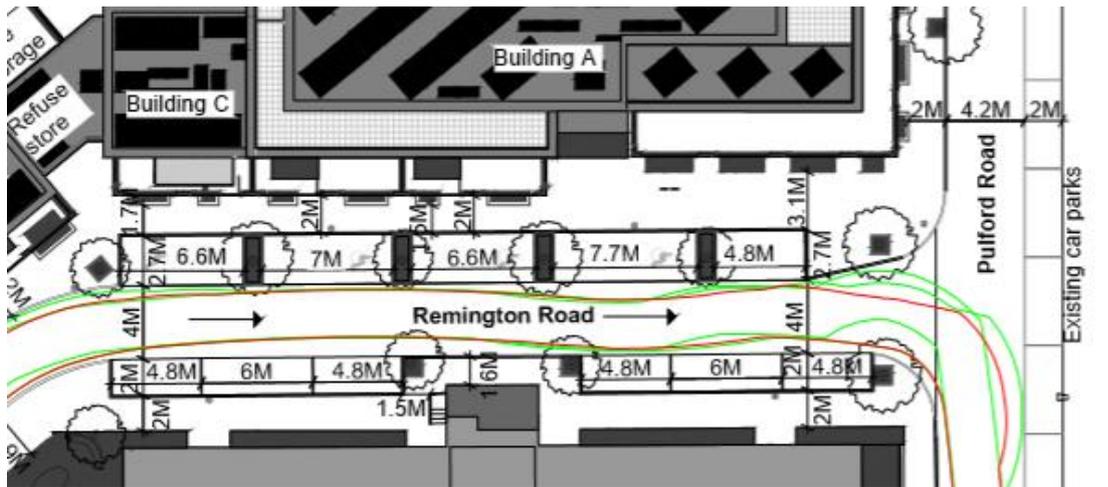
The daylight and sunlight for internal rooms assessment has been carried out based on the established BRE criteria.

Even with the current report Of the 18 private gardens, 14 receive less than 2 hours of sunlight on March 21st in all of the garden and only two actually meet the requirement of half of the garden receiving 2 hours of sunlight on March 21st. The communal garden isn't analysed but as the gardens that surround it don't meet the requirement it's safe to assume it doesn't either. It is hard to give much credence to the claim that this green space is improved then, as a North facing communal amenity space is a negative in their own analysis and this one in particular is likely to not reach the BRE standards for light, which the current layout does achieve.

BRE guide for external spaces is intended to be used flexibly, particularly in urban locations, and the assessors are of the opinion that the proposal still provides a good level of external amenity for its future occupants, especially when taking into account the site constraints.

All outdoor amenity spaces are usable and attractive. The northeast facing communal amenity space is supplemented with new south facing amenity spaces such as Seven Sisters Square. No home has a private amenity space that faces solely due north.

Access



For access the refuse trucks will pass along Remington road, this presents a conflict as there is not the width for the truck to pass by the planned trees, there are 10 tree's along the route that a truck would pass through (green lines represent the swept path of the trucks body, red lines the swept path of the trucks, its particularly bad at the end of the road where there is a double row of trees planned. As refuse trucks are 4m high they won't pass under trees canopy but push through it.

- Suitable semi mature trees are proposed along the streets areas.
- A tree schedule has been provided and stated that crowns of the tree are 2m above the pavement to allow for vehicles to pass under and for vision splays.
- The trees have been specified at standard supply sizes 20-25cm girth min 2m clear stem - the Pyrus (Pyrus calleryana 'red Spire) - proposed is a narrow-crowned tree that should not significantly encroach on the road space. It has deep roots and is suitable for street planting, is, frost and pollution tolerant and has good wind resistance - it has small leaves that will remain on the tree well into autumn and early winter depending on the weather. It has an average growth rate (approx. 12cm per year).
- the trees will be 'street trees' so their maintenance/trimming will be carried out by Highways and it is expected that there should not be any issues with foliage/branches impacting the ability to make refuse and recycling collections.

And this what's shown in the reports offered by the applicant, however tree's grow, the ones suggested for Remington road grow at 1-2 feet per year according to RHS. The suggestion of the applicant and the usual procedure on council estates is for them to be trimmed every 5 years, this would result in two tree's closing the gap between them by 10-20 feet, or the entirety of the road. It's telling that the applicant did not choose to forego a couple of tree's here when they are adding so many trees to the site, in likelihood this is because the loss of two trees would have meant they failed to reach the UGF threshold even overlooking the errors outlined above.

- Trees should be pruned every 2-3 years while young and every 3-5 years thereafter.
- The trees have been specified at this size as this is best for establishment.

Overlooking

for the existing tenants as the side of their homes facing the proposed building is kitchen entrance hall and walkway there shouldn't be a severe issue, however for the new tenants in the block they will be facing five stories of walkways which run the entire length of the building, this is the most extreme example of overlooking that could be produced- offering an individual panoramic views into any of the proposed flats they chose to.

As part of the applicants justification for rejecting option 5, the design the QRP suggested the they explained there was a negative due to 'Compromised privacy to windows due to deck access" the same logic should be applied to the applicants preferred option, with the existing flats opposite having deck access running the length of the building and will be much closer than in the option the QRP suggested exploring.

- The separation distance to the existing housing block is 15.8m – 18.2m
- The existing block has non-habitable rooms of small kitchens, entrances and bathrooms facing Remington Road
- Daylight and sunlight testing has been provided to confirm that the proposed separation distance to the existing habitable is acceptable based on BRE criteria.
- The overlooking distance was increased by 2m following QRP comments.