

REPORT FOR CONSIDERATION AT PLANNING SUB-COMMITTEE

1. APPLICATION DETAILS

Reference No: HGY/2022/0011

Ward: Noel Park

Address: 573-575 Lordship Lane N22 5LE

Proposal: Demolition of existing buildings and redevelopment of site to provide 17 affordable residential units (Use Class C3) with landscaping and other associated works.

Applicant: Radia Arkay Windows

Ownership: Private

Case Officer Contact: Christopher Smith

Date received: 22/12/2021

Drawing number of plans:

PL-001, PL-005, PL-010, PL-011, PL-031, PL-050, PL-099, PL-100, PL-101, PL-102, PL-103, PL-104, PL-201, PL-301, PL-302, PL-401, PL-402.

Supporting documents also of relevance to the application:

Design and Access Statement, Planning Statement, Heritage Statement, Statement of Community Involvement, Fire Statement, FRA & SuDS Strategy Report, London Sustainable Drainage Proforma, Daylight & Sunlight Report, Air Quality Assessment, Phase I Site Appraisal, Energy & Sustainability Statement, Tree Survey and Tree Constraints Plan, Urban Greening Factor, Transport Statement, Framework Residential Travel Plan.

1.1 This application is being reported to the Planning Sub Committee as it is a major application recommended for approval.

1.2 SUMMARY OF KEY REASONS FOR RECOMMENDATION

- The development would be acceptable in land use terms as the loss of employment floorspace would be outweighed by the provision of much needed new affordable housing on a small non-designated employment site that is no longer suitable for modern employment purposes within a predominantly residential area.

- The development would provide a high-quality design that reflects the character and appearance of the surrounding area and preserves and enhances the setting of the nearby conservation areas.
- The development has been designed to ensure that a redevelopment of the adjacent petrol station can come forward in the future, without prejudicing the ongoing use of the petrol filling facilities in the short term in accordance with Agent of Change principles.
- The development would provide 17 new high-quality affordable residential units in a suitable mix of housing, including 11% family-sized homes and 11% wheelchair accessible homes, that would contribute to the provision of mixed and balanced communities in the local area.
- The development would not have a material adverse impact on the amenity of adjoining residential occupiers. The internal layout of the development would be of an acceptable quality.
- Car-free development (except for two wheelchair-accessible parking spaces) is acceptable in this highly sustainable location and would be supported by an appropriate number of cycle parking spaces within dedicated, secure and covered storage areas.
- The development would incorporate measures to minimise carbon on-site and would provide an appropriate carbon off-setting payment, in addition to securing other sustainability measures including a green roof, on-site planting and biodiversity improvements.
- All other relevant policies and considerations, including equalities, have been taken into account.

1.3 All other relevant policies and considerations, including equalities, have been taken into account. Planning permission should be granted for the reasons set out below. The details of the decision are set out in the RECOMMENDATION.

2. RECOMMENDATION

2.1 That the Committee resolve to GRANT planning permission and that the Head of Development Management or Assistant Director of Planning, Building Standards & Sustainability is authorised to issue the planning permission and impose conditions and informatives subject to the signing of a Section 106 Legal Agreement providing for the obligations set out in the Heads of Terms below.

2.2 That the section 106 legal agreement referred to in resolution (2.1) above is to be completed no later than 31st July 2022 or within such extended time as the Head

of Development Management or the Assistant Director of Planning, Building Standards & Sustainability shall in her/his sole discretion allow; and

- 2.3 That, following completion of the agreement(s) referred to in resolution (2.1) within the time period provided for in resolution (2.2) above, planning permission shall be granted in accordance with the Planning Application subject to the attachment of the conditions; and
- 2.4 That delegated authority be granted to the Assistant Director of Planning, Building Standards & Sustainability/Head of Development Management to make any alterations, additions or deletions to the recommended heads of terms and/or recommended conditions as set out in this report and to further delegate this power provided this authority shall be exercised in consultation with the Chair (or in their absence the Vice-Chair) of the Sub-Committee.

Conditions

- 1) Three years to commence
- 2) In accordance with plans
- 3) Materials details
- 4) Wheelchair accessible units
- 5) Satellite dish or antenna
- 6) Secured by design
- 7) External lighting
- 8) Accessible parking spaces
- 9) Parking restrictions
- 10) Construction logistics plan
- 11) Interim travel plan
- 12) Full travel plan
- 13) Boundary treatments
- 14) Landscaping details
- 15) Access from Moselle Avenue
- 16) Equipment noise limits
- 17) Sound insulation
- 18) Cycle parking
- 19) Delivery and servicing plan
- 20) Contamination investigation
- 21) Unexpected contamination
- 22) Environmental management plans
- 23) Considerate constructor scheme
- 24) Energy statement
- 25) Overheating mitigation
- 26) Living roofs
- 27) Ecological enhancements
- 28) Electric vehicle parking
- 29) Site drainage management

30) District energy network connection

Informatives

- 1) Proactive statement
- 2) Signage
- 3) Naming and numbering
- 4) Asbestos survey
- 5) Water pressure
- 6) Designing out crime contact
- 7) Environmental permit

Section 106 Heads of Terms:

1) Affordable Housing

- 100% affordable housing
- 60% London Affordable Rent, 40% intermediate sale/shared ownership
- Council has time-limited first option to purchase homes

2) Loss of Employment Floor Space

- Payment of a financial contribution of £24,711 towards promoting employment and adult education in Haringey

3) Car Free Development

- No users of the residential units will be entitled to apply for residents, business or visitor parking permits in the vicinity of the development
- The relevant Traffic Management Order (TMO) controlling local on-street parking must be amended for which a sum of £4,000 is required

4) Car Club Memberships

- Establishment of a car club scheme in the vicinity of the development
- Two years free membership for all residents
- £50 credit per year for first two years for all residents
- Enhanced membership (three years free membership and £100 credit per year) for occupiers of the three-bedroom residential units, up to a maximum of two occupiers per unit

5) Travel Plan Monitoring

- The review and monitoring of the Travel Plan Statement (secured by condition) over a period of five years starting from the submission of the Full Travel Plan Statement (including the baseline staff travel survey). A

financial contribution of £3,000 will be required to be paid in full to this effect.

6) Zero Carbon Measures

- Submission of a revised Energy Statement prior to implementation
- Submission of a Sustainability Statement within three months of occupation
- Carbon Offsetting contribution of £17,744 (including 10% management fee), 50% (plus management fee) to be paid on implementation and 50% on final approval of Sustainability Statement referenced above

7) Employment and Skills Plan

- Submit an ESP to the Council for its written approval 28 days prior to the implementation of the development
- Commit a named individual to engage with the Council's Employment and Skills Team and Construction Partnership Network
- Minimum 20% of the peak on-site workforce to be Haringey residents for a minimum of 26 weeks
- Provision for the delivery of bespoke skills-based training (20%) and traineeships (5%) for Haringey priority groups. These opportunities must be open to candidates (including priority groups) nominated by the Council (or another agency as agreed by the Council)
- Provision of apprenticeships nominated by the Council at one per £3m development cost (max. 10% of total construction workforce) supported by a fee of £1,500 per apprentice placement to cover the recruitment process
- Provision of work placements for unemployed and/or economically inactive Haringey residents
- Provision of STEM and/or Career Inspirational workshop sessions in agreement with the Council's Employment and Skills Team
- Other initiatives as recommended by the Council's Employment and Skills Team and Construction Partnership
- Support for suppliers and businesses which are based in Haringey to tender for such works as may be appropriate for them to undertake and/or support for locally based social enterprises including capacity building assistance through advice, business planning, mentoring and the purchase of products or services.

8) Monitoring Contributions

- £500 for all non-financial heads of terms above (£1,000)
- Contributions to be provided on implementation of the development to enable adequate monitoring over the course of its lifetime

- 2.5 In the event that members choose to make a decision contrary to officers' recommendation members will need to state their reasons.
- 2.6 That, in the absence of the agreement referred to in resolution (2.1) above being completed within the time period provided for in resolution (2.2) above, the planning permission be refused for the following reasons:
1. The proposed development, in the absence of a legal agreement securing a financial contribution to mitigate for the loss of employment floor space, would fail to safeguard local employment opportunities. As such, the proposal is contrary to Policy DM40 of the Development Management DPD 2017 and Policy SP8 of the Local Plan 2017.
 2. The proposed development, in the absence of a legal agreement securing the provision of affordable housing, would fail to secure mixed and balanced communities in the local area. As such, the proposal is contrary to Policy DM13 of the Development Management DPD 2017 and Policy SP2 of the Local Plan 2017.
 3. The proposed development, in the absence of a legal agreement securing parking permit restrictions and other parking control measures, would create an excess of on-street parking in the local area to the detriment of highway and public safety. As such, the proposal is contrary to Policy DM32 of the Development Management DPD 2017.
 4. The proposed development, in the absence of a legal agreement securing sufficient energy efficiency measures and/or financial contribution towards carbon offsetting, would result in an unacceptable level of carbon dioxide emissions. As such, the proposal would be contrary to Policy SI2 of the London Plan, Local Plan 2017 Policy SP4 and Policy DM21 of the Development Management DPD 2017.
 5. The proposed development, in the absence of a legal agreement to work with the Council's Employment and Skills team and to provide other employment initiatives would fail to support local employment, regeneration and address local unemployment by facilitating training opportunities for the local population. As such, the proposal is contrary to Policy SP9 of Haringey's Local Plan 2017.
- 2.7 In the event that the Planning Application is refused for the reasons set out in resolution (2.5) above, the Head of Development Management (in consultation with the Chair of the Planning Sub-Committee) is hereby authorised to approve any further application for planning permission which duplicates the Planning Application provided that:
- i. There has not been any material change in circumstances in the relevant planning considerations, and

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

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3. PROPOSED DEVELOPMENT AND LOCATION DETAILS

3.1 Proposed development

- 3.1.1 This application seeks planning permission for the demolition of the existing buildings on site and erection of a four-storey building with 17 residential units. The building would be accessed from Moselle Avenue via Coldham Court.



- 3.1.2 The residential accommodation would be 100% affordable housing in 60% London Affordable Rent and 40% intermediate sale tenure. Ten one-bedroom units, five two-bedroom units and two three-bedroom units (11.7%) are proposed. Two units would be wheelchair user homes (11.7%).
- 3.1.3 The development would be car-free. Two wheelchair-accessible car parking spaces would be provided in front of the building. High-quality cycle parking spaces are also proposed.
- 3.1.4 The building would be finished in two different tones of red brick, grey zinc roof cladding, and grey metal windows, doors and balustrades. The building would be sited within a landscaped setting with a significant amount of new planting including the provision of several new trees.

3.2 Site and Surroundings

- 3.2.1 The application site is 0.08 hectares in area and is located on a back-land site between Lordship Lane (north) and Moselle Avenue (south). It is currently occupied by two storey industrial-type buildings in warehouse and workshop use

with ancillary offices. To the north of the site is the Esso petrol station. To the north-east are two storey buildings fronting onto Lordship Lane and to the south-east are two storey buildings fronting onto Moselle Avenue. To the west of the site is a three-storey block of flats, which forms part of Coldham Court, and its associated car park.

- 3.2.2 The surrounding area, other than the petrol station, is predominantly residential consisting of two, three and four storey buildings. There are some commercial properties a short distance away from the site to both the west and the east. The site is a short walk from Wood Green Town Centre and has a PTAL rating of 5.
- 3.2.3 The site is bordered on two sides by conservation areas. To the north-east of the site is the Lordship Lane Conservation Area and to the south-east is the Noel Park Conservation Area. There are no listed or locally listed buildings on the site or in its immediate vicinity. The Moselle Brook watercourse runs in a culvert to the rear of the site and this watercourse is part of a Blue Ribbon Network. The site is also located within a Ground Source Protection Zone 2.

3.3 Relevant Site Planning History

- 3.3.1 The application site shares its address with the adjacent petrol station. The only planning application submitted since the 1970s relating to this site is described below.
- 3.3.2 HGY/2000/0573. Erection of side extension to existing building to house - MOT and exhaust centre. Permission granted 13/06/2000.

4. CONSULTATION RESPONSE

4.1 Quality Review Panel (QRP)

- 4.2 The proposal was presented to the QRP on 24th February 2021. The Panel expressed general support for residential development of the scale proposed in this location. It recommended that further design work focussed on maximising the residential and environmental quality of the development.
- 4.3 The Panel's comments are set out in full in Appendix 3. An analysis of how the Panel's key comments have been addressed is provided within a table in the design section of this report below.

4.4 Planning Application Consultation

- 4.5 The following were consulted regarding this planning application:
- 4.6 INTERNAL

- 4.7 Design Officer
- 4.8 Supports the development which is well designed and appropriate for the site.
- 4.9 Conservation Officer
- 4.10 The proposed development would preserve the character and appearance of the conservation areas and there would be no adverse impact on their significance. No objection from a conservation perspective.
- 4.11 Transportation
- 4.12 No objections raised, subject to conditions and legal requirements.
- 4.13 Regeneration
- 4.14 No objections.
- 4.15 Climate Change Officer
- 4.16 No objections, subject to conditions.
- 4.17 Housing
- 4.18 No objections.
- 4.19 Pollution
- 4.20 No objections, subject to conditions and informatives.
- 4.21 Waste Management
- 4.22 No objections.
- 4.23 Lead Flood and Water Management Officer
- 4.24 No objections.
- 4.25 Employment and Skills
- 4.26 No objections. The Council's employment and skills obligations should be secured.
- 4.27 Tree Officer
- 4.28 No objections, subject to conditions.

4.29 EXTERNAL

4.30 Environment Agency

4.31 No objections, subject to informatives.

4.32 Canal and River Trust

4.33 No comments to make.

4.34 Thames Water

4.35 No objections raised, subject to informatives.

4.36 London Fire Brigade

4.37 No comments received.

4.38 Metropolitan Police

4.39 No objections raised, subject to conditions requiring the scheme to achieve Secured by Design certification.

5. LOCAL REPRESENTATIONS

5.1 The following were consulted:

- 92 neighbouring properties
- Public notices were put up in the vicinity of the site

5.2 The number of representations received from neighbours, local groups etc in response to notification and publicity of the application are described below.

5.3 Responses from individual addresses (5)

- 5 in Objection/Comment

5.4 The following local groups/societies made representations:

- None

5.5 The following local representatives also commented:

- None

5.6 The issues raised in representations that are material to the determination of the application are summarised as follows:

- Loss of privacy

- Loss of daylight
- Increased noise disturbance
- Low residential quality
- Loss of parking
- Loss of safety and security
- Disturbance from construction works

5.7 The following issues raised are not material planning considerations:

- Not all neighbours notified of application (Officer note: 92 neighbouring residents have been consulted via letter which covers all residential properties in the immediate vicinity of the site. Public notices have also been posted close to the site. Consultations have been undertaken in accordance with the Council's Statement of Community Involvement)

6 MATERIAL PLANNING CONSIDERATIONS

The main planning issues raised by the proposed development are:

1. Principle of the Development
2. Affordable Housing Provision and Mix
3. Design and Appearance
4. Heritage Impact
5. Residential Quality
6. Impact on Neighbouring Amenity
7. Parking and Highways
8. Carbon Reduction
9. Flood Risk, Drainage and Waterways
10. Biodiversity and Urban Greening
11. Air Quality and Land Contamination
12. Fire Safety

6.1 Principle of the Development

Policy Framework

- 6.1.1 The National Planning Policy Framework 2021 (NPPF) establishes the overarching principles of the planning system, including the requirement of the system to “drive and support development” through the local development plan process. It advocates policy that seeks to significantly boost the supply of housing and requires local planning authorities to ensure their Local Plan meets the full, objectively assessed housing needs for market and affordable housing.

Regional Policy – The London Plan

- 6.1.2 The London Plan 2021 is the overall strategic plan for London that sets out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years. It sets out a range of objectives for development through various policies. The policies in the London Plan are accompanied by a suite of Supplementary Planning Guidance (SPG) documents that provide further guidance and policy advice.
- 6.1.3 The London Plan has provided Haringey with a target of 15,920 homes to be completed over the ten-year period of 2019 to 2029. This is an annualised target for Haringey of 1,592 homes.
- 6.1.4 Policy H1 'Increasing housing supply' states that boroughs should optimise the potential for housing delivery on all suitable and available brownfield sites. London Plan Policy D6 seeks to optimise the potential of sites, having regard to local context, design principles, public transport accessibility and capacity of existing and future transport services. It emphasises the need for good housing quality which meets relevant standards of accommodation.

Local Policy

- 6.1.5 The Haringey Local Plan Strategic Policies DPD 2017 (hereafter referred to as Local Plan) sets out the long-term vision of the development of Haringey by 2026 and also sets out the Council's spatial strategy for achieving that vision.
- 6.1.6 Local Plan Policy SP2 states that the Council will aim to provide homes to meet Haringey's housing needs and to make the full use of Haringey's capacity for housing by maximising the supply of additional housing to meet and exceed the minimum target including securing the provision of affordable housing.
- 6.1.7 The Development Management DPD 2017 (hereafter referred to as the DM DPD) supports proposals that contribute to the delivery of the strategic planning policies referenced above and sets out its own criteria-based policies against which planning applications will be assessed. Policy DM10 seeks to increase housing supply and seeks to optimise housing capacity on individual sites. Policy DM13 makes clear that the Council will seek to maximise affordable housing delivery on all sites. Policy DM40 states that non-designated employment land in highly accessible locations will be considered acceptable for mixed-use employment-led development. It also says that the loss of employment land may be permitted where it is no longer suitable for continued employment use.
- 6.1.8 The 'presumption in favour of sustainable development' and paragraph 11(d) of the NPPF should be treated as a material consideration when determining this application which states for decision-taking this means granting permission unless the application of policies in the NPPF that protect areas or assets of particular importance provides a clear reason for refusal or any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed

against the policies in the NPPF taken as a whole. Nevertheless, decisions must still be made in accordance with the development plan (relevant policies summarised in this report) unless material considerations indicate otherwise (of which the NPPF is a significant material consideration)

Land Use Principles

Provision of New Affordable Homes

- 6.1.9 Policy DM10 of the DM DPD states that windfall housing sites will be considered acceptable where they comply with the relevant policies.
- 6.1.10 The 17 affordable residential would contribute towards the Council's overall housing targets in a sustainable and appropriate location. Therefore, the provision of a new residential development of 100% affordable housing on this site is supported subject to compliance with all other relevant design, residential quality and amenity standards, etc, and the loss of employment on the site which are assessed in the sections below.

Loss of Existing Employment Floor Space

- 6.1.11 The site is a non-designated employment site. Policy DM40 of the Development Management Development Plan Document (DM DPD) states that on non-designated employment sites in accessible locations the Council will support proposals for mixed-use development. Whilst this site is highly accessible (PTAL of 5) in respect of its proximity to public transport its back land location behind a petrol station and residential properties means it does not have a clear frontage onto the public realm and is accessed over the private land of either the petrol station or Coldham Court. Therefore, the quality of employment space that can be provided is constrained and the provision of affordable housing has been prioritised.
- 6.1.12 Policy DM40 continues to state that where employment land would be replaced entirely this will only be acceptable where the site is no longer suitable for continued employment use, with regard to: (a) feasible alternative employment uses; (b) the age/condition of existing buildings and their potential for refurbishment and adaptation; (c) site layout, access and relationship to neighbouring uses; (d) periods of long-term vacancy, and; (e) evidence of recent site marketing. Furthermore, where the loss of employment is considered acceptable by the Council the provision of community uses on site should take priority, with a financial contribution towards employment initiatives required if no non-residential units are provided on site as part of the proposed development.

The existing buildings are dated and in need of considerable renovations to bring them up to modern standards. The site lacks a direct vehicle access as it is currently accessed over the forecourt of the adjacent petrol station. The site is also

surrounded on its other three sides by residential properties. Although the site is still occupied by the applicant's business, they plan to relocate their operations to another more suitable site. Given the characteristics of this site as having significant access and neighbouring use constraints, noting the type and age of the existing buildings on site and given the site's location away from a cluster of other industrial-type business operations, it is considered that the redevelopment of this site is outweighed by the provision of an affordable housing development.

6.1.13 For similar reasons the site is also considered unsuitable for community uses. In order to compensate for the loss of employment land uses on this site the applicant will be required, in accordance with policy DM40 of the DPD, to provide a financial contribution towards employment initiatives in the local area and this will be secured by legal agreement.

6.1.14 As such, the proposed development is acceptable in land use terms.

6.2 Affordable Housing Provision and Mix

Affordable Housing Provision

6.2.1 Policy SP2 of the Local Plan identifies a Borough-wide affordable housing target of 40%. Policy DM13 of the DM DPD states that developments with capacity to accommodate more than ten dwellings should provide the maximum reasonable amount of affordable housing on-site. It also states that developments should seek the provision of 60% affordable rent and 40% intermediate housing.

6.2.2 The proposed development would include 17 (100%) affordable housing units with a 60:40 split between London Affordable Rent and intermediate sale tenures which complies with the requirements of Policy DM13 of the DM DPD. The applicant is in discussions with the Council about providing these homes as social rented properties in the future. The Council would have a first option to purchase the block and provide these homes for Council rent and this would be secured through legal agreement.

Affordable Housing Mix

6.2.3 London Plan Policy H10 states that developments should generally consist of a range of unit sizes in order to ensure that mixed and balanced communities are delivered. This policy position is supported by Policy SP2 of the Local Plan and Policy DM11 of the Development Management DPD.

6.2.4 17 dwellings are proposed and two of these would be three-bedroom units (11.7% of the overall number of dwellings). Two wheelchair accessible units would also be provided. The site is highly constrained by existing residential properties and a petrol station on all four sides. The amount of space available for ancillary features to support family-sized housing, such as amenity and play space, is therefore very

limited in this location. As such, it is not possible to provide more three-bedroom units in this development. Furthermore, the surrounding area includes a large proportion of family-sized terraced dwelling houses.

- 6.2.5 As such, it is considered that the proposed mix of dwellings would not lead to an overconcentration of one and two bedroom homes in this area and would contribute towards the provision of mixed and balanced communities. The development is therefore in accordance with the policies referenced above.

6.3 Design and Appearance

- 6.3.1 The NPPF states that the creation of high-quality buildings and places is fundamental to what the planning process should achieve and that good design is a key aspect of sustainable development. The London Plan includes a requirement to optimise site capacity through a design-led approach through Policy D6.
- 6.3.2 Local Plan Policy SP11 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. Policy DM1 states that all development must achieve a high standard of design and contribute to the distinctive character and amenity of the local area, and that developments should respect their surroundings by being sympathetic to the prevailing form, scale, materials and architectural detailing.

Height and Massing

- 6.3.3 The proposed development would be three storeys in height with a set back fourth storey. The materials take cues from other buildings in the area, including the grey slate roofs and red brickwork of houses on Moselle Avenue. There are several other four storey buildings in proximity to the site and within the immediate local area, including 591 and 606 Lordship Lane, and the housing blocks at Andrula Court (fronting Lordship Lane) and Pickering Court (fronting Granville Road). The building is located on a back-land site and thus would not appear prominent in the street frontages of Lordship Lane and Moselle Avenue.

Architectural Expression, Fenestration & Materiality

- 6.3.4 The proposals have been designed with a distinct base, middle and top, which is articulated through a change in finishing materials, for example darker brick at ground level, lighter brick in the centre, and a light-grey metal roof. Fenestration is orderly and well-proportioned with vertical emphasis to match the context of the Noel Park Estate.
- 6.3.5 Despite being a modestly sized development, views of the proposals have been carefully considered, especially from the south-east and south west, through the entrance to Coldham Court from Moselle Avenue and through the gap between

the end of Moselle Avenue and the neighbouring Lordship Lane estate block (across back gardens), in recognition of their Conservation Area status.



- 6.3.6 The elevation of the building fronting onto the petrol station appears purposeful. It is reasonable to assume that the petrol station would be redeveloped at a point in the future when this proposed building would then be substantially hidden from all public areas by neighbouring buildings. The design has been influenced by this assumption, with main habitable rooms windows and amenity areas located on the southern, western and eastern sides of the building. In the meantime, the building would not appear as just a blank wall onto the petrol station. Rather, the appearance of northern elevation has been considered in much detail.
- 6.3.7 The brick materials would contrast with one another and accord with the darker brick finishes of other blocks in the surrounding area, whilst also referencing the Noel Park Estate. The stair core would be picked out in the darker brick, offering visual interest and highlighting this circulation feature, and would offer bespoke detailing in the form of hit-and-miss patterned brickwork, offering glimpses of form, light and movement on the stairwell behind it. Windows have also been included to further articulate this northern elevation, which would bring activity and offer passive surveillance to this otherwise low-quality functional space fronting onto Lordship Lane.



Quality Review Panel (QRP)

6.3.8 The proposal was presented to the QRP for review on 24th February 2021. The Panel's summary comments are provided below:

6.3.9 *"The panel supports the development's residential use and overall scale but urges the team to consider the residents' experience and environmental quality more fully. One crucial aspect is improving daylight and cross ventilation in the units and the access galleries, to ensure high-quality living spaces. Dual-aspect flats should be prioritised wherever possible, and elevations should respond to their orientation, context and individual conditions. The internal layout of the flats should better consider the relationship between private and common areas within each unit. Further, there is an opportunity to improve the design of the entrance of the building and access to the shared garden."*

6.3.10 *The relationship of the development with the adjacent conservation areas also needs further consideration. The panel feels that the architecture could be softer and less dominating, using materials that relate to the houses on Moselle Avenue; balconies could be lighter in both form and materials. The landscape design needs a more robust and cohesive narrative, carefully considering all of the site's edges and the large existing tree to the east. The green roof also requires a clearer rationale and careful detailing, and a green wall on the north boundary could anticipate future development on the petrol station's site. A potential for creating a connecting path with Coldham Court's gardens should also be investigated."*

6.3.11 The Panel's response confirmed that a single review was sufficient for this development and that the comments raised could be addressed in discussions with Council officers.

6.3.12 Below is a summary of key points from review with officer comments provided in response:

<i>Panel Comments</i>	<i>Officer Response</i>
<i>Summary</i>	
Development use and scale is supported subject to residential quality, architecture and landscaping improvements.	Comments noted.
<i>Design approach and architecture</i>	
The panel supports the development's overall design approach. It feels it is appropriate to treat the building as an extension of Coldham Court and that the heights and scale are suitable to the site.	Comments noted.
The proposed single aspect units have poor daylight and ventilation, especially since the primary glazing is south facing and overhung by deep balconies. The panel urges the team to revisit the design and provide as many dual-aspect units as possible.	The number of single aspect units has been reduced with windows provided on all elevations to maximise aspect and ventilation. 59% (10) dual aspect units have now been provided.
The elevations should respond to their orientation, context and individual conditions. For example, there is an opportunity to create openings on the east side to increase daylight and ventilation, and to create a visual connection with the neighbouring yard.	Windows have now been included on all elevations to improve daylight and ventilation.
The team should investigate alternative designs for the balconies. Lighter elements could allow more daylight while still providing shading, and soften the appearance of the south facade.	Balconies are now more visually permeable, appearing lighter, and the façade has been softened as a result.
The panel urges the team to rethink the residents' circulation spaces, including the access galleries and	Galleries are now shorter with increased access to light through the widened stair core with hit and

staircase. They should be more open and provide enough daylight and ventilation, contributing to a welcoming experience.	miss brickwork allowing natural light to penetrate through.
The main entrance currently faces the disabled car park. There is an opportunity to improve the experience of arrival by rethinking the relationship between the entrance and its immediate surroundings.	Disabled parking must be provided as close to the development entrance as possible. The main access has been moved to the corner of the development providing clarity of access and increasing the size of the garden area for amenity use.
The access to the shared garden is also via the disabled car park. It is essential the residents can access the gardens from within the building, ensuring a pleasant experience and safety for children.	Residents of ground floor units can access gardens directly and some have their own private gardens. Due to site constraints access to the garden remains through the front entrance for residents of upper floors.
The panel questions the value of the green roof. The comparative benefits of alternative elements, such as solar voltaic cells, should be evaluated. If proceeding with the green roof, it requires careful detailing, including the revision of widths, to ensure its viability.	Green roof and solar panels will now be provided on the same roof, which can improve the performance of panels by enabling their cooling. The Council's Carbon Reduction Officer is satisfied with the arrangement and a condition will be included that ensures the green roof will be of a good quality.
<i>Layout</i>	
The layout of the 2-bed flats should be revised to improve the quality of the accommodation provided. For example, the kitchen is notably distant from the living spaces and creates tension between the private and living areas.	Living and dining areas are now better connected as the building form is not as long as it was previously and the flats have a squarer plan.
The panel also questions the symmetry of the scheme layout. The units should respond to the different conditions of the building's orientation, especially the east and west facades.	East and west elevations are now markedly different, with balconies and amenity spaces on the eastern side of the site and oriel windows to the west.

The panel highlights the risk that the current layout will damage the existing tree on the east boundary. It recommends that the building line should be pulled back from the boundary, to ensure this valuable mature tree survives.	The building has been pulled away from the eastern elevation to be further from the existing tree on that site boundary.
<i>Conservation area</i>	
The development will have an impact on views from the adjacent conservation area. In particular, the relatively short distance to the houses on Moselle Avenue, and the concentration of balconies and openings facing the conservation area, risks appearing dominant.	The building has been pulled away further from the houses fronting Moselle Avenue. The balconies have been lightened in appearance, reduced in number and re-sited so as not to be clearly visible in views from within the conservation areas.
The panel suggests the houses on Moselle Avenue could inform the design to achieve a lighter architectural expression. Yellow bricks with red detailing, for example, could help soften the impact of the development on the conservation area.	Yellow brick was considered as an option and rejected as the building failed to integrate successfully with the character of the adjoining conservation areas. During subsequent pre-application discussions it was recommended that a contemporary development with cues taken from the conservation area materials and designs, would be a better design option.
<i>Landscape and ecology</i>	
There needs to be a more robust and comprehensive landscape strategy, covering the entire site, to ensure high-quality shared spaces.	Further detailing of the landscaped areas, including the addition of hedging, has been provided.
A green wall, for example using creepers, between the building and the petrol station could soften the blank north facade and create a better relationship with any future development on the petrol station site.	The northern wall would receive little sunlight and if a future development is built on the petrol station daylight to a green wall would also be severely reduced. Other design measures to enliven the appearance of the northern wall have been integrated, including a

	varied material palette, windows and hit and miss brickwork.
The narrow strip of green on the north boundary requires further thought regarding maintenance and access.	This strip would have been difficult to manage and maintain and as such has been removed from the scheme.
The panel welcomes the idea of opening the Moselle Brook, which has potential to contribute to biodiversity. However, the team should seek advice regarding its viability and integration with the shared garden.	Surveys have shown that this waterway is predominantly located in the rear gardens of the properties on Moselle Avenue and not within this site. The Environment Agency agree that de-culverting is not possible as part of this development.
The tree on the eastern boundary of the site should be retained, as it is of significant biodiversity and amenity value. The design team should therefore ensure an exclusion zone to protect its roots.	The building has been moved away from the tree on the eastern boundary and it will be retained and protected.
<i>Relationship to surroundings: access and integration</i>	
Since the development relies on access via the driveway to Coldham Court, there needs to be clarity regarding its management and maintenance once the project is delivered.	Coldham Court is owned and managed by the Council. The applicant must agree how the access road will be improved and managed through discussions with the Council's Housing team prior to the first occupation of the development.
There is an opportunity to connect the new garden created by the development, with the existing gardens at Coldham Court. This should be explored, as a means of integrating the scheme into the local community.	The new garden would not adjoin Coldham Court directly and thus this recommendation would not be feasible.

- 6.3.13 As set out above, the applicant has actively sought to engage with the QRP during the pre-application stage, and the submitted design has responded to the detailed comments and advice of the Panel.

Conclusion

- 6.3.14 The proposal would deliver a high-quality contemporary residential development that provides good-quality residential accommodation on a constrained site. The height, massing and elevational treatments would combine to form a building that would appear as a positive feature within the local built environment context. The building accords well with the character and appearance of the surrounding area as a result.
- 6.3.15 Therefore, it is considered that the proposal is acceptable in design terms.

6.4 Heritage Impact

- 6.4.1 The application site is not located within a Conservation Area but does border two conservation areas – the Lordship Lane Conservation Area to the east and the Noel Park Conservation Area to the south. There are no listed or locally listed buildings on or close to the site.

Policy Context

- 6.4.2 London Plan Policy HC1 seeks to ensure that development proposals affecting heritage assets and their settings should conserve their significance. This policy applies to designated and non-designated heritage assets. Local Plan Policy SP12 and Policy DM9 of the DM DPD set out the Council's approach to the management, conservation and enhancement of the Borough's historic environment, including the requirement to conserve the historic significance of Haringey's heritage assets and their settings.
- 6.4.3 Policy DM9 of the DM DPD states that proposals affecting a designated or non-designated heritage asset will be assessed against the significance of the asset and its setting, and the impact of the proposals on that significance; setting out a range of issues which will be taken into account.

Legal Context

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

appearance of that area.” Among the provisions referred to in subsection (2) are “the planning Acts”.

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

weight" in the final balancing exercise having regard to other material considerations which would need to carry greater weight in order to prevail.

Assessment of Impact on Heritage Assets and their Setting

- 6.4.10 The setting of a heritage asset is defined in the glossary to the NPPF as: "The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral". There is also the statutory requirement to ensure that proposals 'conserve and enhance' the conservation area and its setting.
- 6.4.11 The design, built form and materiality of the proposed development have been informed by the character and appearance of the surrounding conservation areas, including the three-storey scale of buildings on Lordship Lane (Lordship Lane Conservation Area) and the materiality and design detailing of houses on Moselle Avenue (Noel Park Conservation Area).
- 6.4.12 The proposed building would only be visible in glimpses through the gaps in the buildings within the conservation areas including between 211 and 217 Moselle Avenue and between 251 Moselle Avenue and 551 Lordship Lane. During parts of the year the building would be significantly screened from public views by existing tree and other planting.



6.4.13 The Council's Conservation Officer has commented on this application, stating that: *"it is considered that the proposed development would preserve the character and appearance of the conservation areas and there would be no adverse impact on their significance. Therefore, there is no objection from a conservation perspective."*

6.4.14 As such, it is considered that the development would not create any harm to any heritage assets or their setting and therefore the application is acceptable in terms of its heritage impact.

6.5 Residential Quality

6.5.1 The Mayor of London's Housing SPG sets out a range of detailed design requirements for new dwellings in London. Policy DM1 of the DM DPD requires developments to provide a high standard of amenity for its occupiers.

Layout, Residential Aspect, Private Amenity Space and Play Space

6.5.2 Standard 29 of the Housing SPG states that developments should minimise the number of single aspect dwellings. Where these cannot be avoided single aspect dwellings should not face north or be exposed to high noise levels. Units with three or more bedrooms should not be single aspect. Standard 26 of the Housing SPG states that a minimum of 5sqm of private outdoor space should be provided for each dwelling, with larger spaces provided for units of three or more bedrooms.

6.5.3 All homes would meet the internal layout requirements of the London Plan. Ten of the homes (59%) would have dual or triple aspect. None of the single aspect dwellings would face north or towards a noisy environment. All three-bedroom units would have dual or triple aspect. All homes would have direct access to a private amenity space area of at least 5sqm in size in addition to shared access to a communal garden on the southern side of the building. The three-bedroom dwellings would benefit from an additional private garden or balcony space.

6.5.4 The anticipated child yield from the proposed development exceeds ten, which triggers a requirement for on-site play space (104sqm). A dedicated play area has been shown on the eastern side of the shared garden which covers 140sqm. Exact details of the size and quantum of play space provision can be secured by condition.

6.5.5 As such, it is considered that the overall residential quality of the proposed development would be good.

Accessibility, Safety and Security

6.5.6 Policy D7 of the London Plan requires 10% of new housing to be wheelchair user dwellings in accordance with M4(3) of the Building Regulations. Two (11.7%) of

the properties would be wheelchair user dwellings which exceeds this policy requirement. One of these would be on the ground floor and the other can be reached via a wheelchair accessible lift.

- 6.5.7 Policy DM2 of the DM DPD states that developments should be safe, easy to access and accessible by all. The development would be reached from Moselle Avenue via Coldham Court. There is a gated entrance from Moselle Avenue which occupiers of the development would share with the residents of Coldham Court. Residents would reach the development via a pavement that leads from this gate. The main residential access would be from a visually open and glazed wide and level doorway on the corner of the ground floor of the block which would face towards the car parking area. The entrance offers increased lighting and natural surveillance over the existing car park.
- 6.5.8 The Metropolitan Police Designing Out Crime Officer has been engaged prior to the submission of this application and his comments integrated into the building layout and detailed design. The Designing Out Crime Officer has commented on this application and raises no objections subject to conditions. A further condition will also be added to ensure that access arrangements from Moselle Avenue are reviewed and improved prior to the first occupation of the development.

Sun and Daylight, Outlook and Privacy

- 6.5.9 The BRE guidelines for day/sunlight were updated in June 2022. The updated guidance includes a new methodology for assessing day and sunlight levels within proposed development. On the date this application was submitted the former BRE guidelines from 2011 were still relevant. The *Daylight & Sunlight Report* submitted with this application has modelled the development against the 2011 guidelines. Although these former guidelines have now been replaced the Council considers that they still provide appropriate thresholds against which to assess the quality of new residential development in respect of day and sunlight levels.
- 6.5.10 All proposed homes would meet the BRE's guidelines for levels of daylight. 14 (82%) of the proposed main living rooms would achieve the recommended levels of annual and winter probable sunlight hours thus meeting the 2011 BRE guidelines entirely. The remaining three main living rooms would all meet the annual sunlight hours target but would not meet the BRE winter sunlight hours target (5%), each achieving 3-4% instead. This shortfall is because the affected units are located on the northern side of the building where there is significantly less sunlight availability. The shortfall for these three units is also small resulting in a maximum 2% shortfall of sunlight in winter only, against the BRE's 2011 guidelines. It is considered that a slight shortfall in sunlight during winter for three of the homes is acceptable in the circumstances.



6.5.11 The separation distance from the proposed building towards the main rear wall of the existing dwellings to the south on Moselle Avenue is at least 17 metres, which is sufficient to prevent excessive overlooking within an urban area.

6.5.12 The separation distance between the buildings on Lordship Lane to the east and the nearest habitable room in the proposed development is at least 13 metres. The relationship between these two buildings is at an angle so any overlooking from neighbouring properties would not be directly into the proposed living areas.

6.5.13 The flats on the eastern side of Coldham Court do not have side windows and thus there is no overlooking from that building. There are no large windows on the northern side of the proposed block that would enable overlooking from the flats within the Coldham Court blocks into the habitable rooms located within this proposed building. Outlook from the proposed flats would be excellent with uninterrupted space above ground floor level and planted green spaces for flats on the ground floor.

6.5.14 As such, the outlook, privacy and provision of day/sunlight for the proposed units are of a good quality and are therefore considered to be acceptable.

Air Quality, Noise and Light Disturbance

6.5.15 The surroundings on the eastern, western and southern sides of the application site are of a low-rise residential character and as such no disturbance to future residents of the site is expected from these areas. Light spill from existing homes would not be significant enough to cause disturbance to future residents of the proposed homes.

6.5.16 The new homes would be located close to a petrol station to the north and the public highway on Lordship Lane is 35 metres away from the site to the north. The *Air Quality Assessment* submitted with the application has assessed potential air pollution levels from the nearby road and the air pollution modelling undertaken has shown that the development is expected to fall well within the required air quality objectives. The 35 metre separation distance of the building from Lordship Lane would ensure that noise levels from traffic are low. The main windows and amenity spaces for the dwellings face south to maximise residential amenity provision on the quieter sides of the development.

6.5.17 The pumps at the petrol station would be likely to emit some benzene fumes. Local Air Quality Management Technical Guidance (Defra, 2021) states that there is no concern regarding resident exposure to benzene unless dwellings are within 10 metres of the pumps. The proposed development is more than 13 metres from the existing petrol pumps. The risk of fire or explosion from petrol stations is considered low as these facilities are governed by strict regulations.

Agent of Change

6.5.18 London Plan Policy D13 states that development should be designed to ensure that established noise generating uses remain viable.

6.5.19 As described in the design section above the adjacent petrol station is expected to be developed in the long-term, but in the short-term the facility is a viable commercial operation that serves vehicle users in the local area and this viability must not be prejudiced by new residential development.

6.5.20 The detailed design of the proposed building has responded to the potential residential amenity impacts that could occur from a petrol station including from noise and fumes as described above. Good quality amenity spaces and main habitable rooms are located on the eastern and southern sides of the development, away from the petrol station operations. A scheme of sound insulation will be required for the northern elevation to ensure noise to adjacent rooms is kept to a minimum. The building's orientation and high quality should therefore ensure that there is no pressure on the operator to reduce their business activities as the result of this development.

6.6 Impact on Neighbouring Amenity

6.6.1 Policy DM1 of the DM DPD requires developments to ensure a high standard of privacy and amenity for its users and neighbours.



Daylight and Sunlight Impact

- 6.6.2 The *Daylight & Sunlight Report* submitted with the application shows that there would not be a significant reduction in daylight and sunlight received at any properties surrounding the site, including those at 13-23 Coldham Court, 211 Moselle Avenue, 217-241 (odd) Moselle Avenue and 557-571 Lordship Lane. None of the rooms in the properties studied would see a reduction in their daylight beyond 80% of the existing level as recommended by the BRE and as such good levels of daylight to neighbouring properties would be retained. All rooms studied would also have high levels of sunlight.

Overshadowing

- 6.6.3 The orientation of this building to the north of existing residential gardens for the dwellings on Moselle Avenue means that there would not be significant overshadowing of these neighbouring amenity areas. There may be some additional overshadowing of the existing garden areas to the east and west of the site but would not be significant. The garden areas for the properties fronting Lordship Lane to the east would still receive ample sunlight from the south and west, and the Coldham Court gardens would continue to be well-lit from the east and west, as they are currently.

Outlook and Privacy

- 6.6.4 The plan form of the proposed building would generally align with that of the building immediately to the west on Coldham Court. There are no windows in the

eastern side of that building. As such, the residents in that building would not be affected by this proposal in terms of a loss of outlook or privacy.

- 6.6.5 The separation distance between the proposed building and the main rear walls of the existing dwellings to the south on Moselle Avenue is at least 17 metres. This is a significant separation distance for an urban area and comparable to that between the two blocks of Coldham Court on the adjacent land to the west. It is noted that the main habitable rooms for the dwellings on Moselle Avenue are located to the front (south) of those dwellings and as such the amenity of these rooms would not be affected by the proposed development. As such, it is considered that any overlooking from the proposed development would not be so significant as to lead to a reason for refusal in this case.
- 6.6.6 The distance between the properties on Lordship Lane to the proposed development is at least 12 metres to the east. The new homes would face the backs of those neighbouring properties directly. Outlook from the rooms and amenity areas above ground floor level would be significantly screened by the existing tree. As such, there would be no significant overlooking from the proposed living areas into the main living areas of neighbouring properties.
- 6.6.7 Therefore, it is considered that existing residential properties close to the site would not be materially affected by the proposal in terms of loss of day/sunlight, outlook or privacy.

Other Amenity Considerations

- 6.6.8 Policy DM23 states that developments should not have a detrimental impact on air quality, noise or light pollution.
- 6.6.9 The submitted *Air Quality Assessment* (AQA) states the development would be air quality neutral with respect to transport-related and building-related emissions. External lighting installations would be designed to minimise light spill towards neighbouring properties and create a secure environment in the local area. An excessive increase in noise disturbance is not expected from the entirely residential development proposed and noise from plant associated with the development shall be controlled by condition to ensure nearby residential properties would not be affected.
- 6.6.10 Therefore, it is considered that the amenity of neighbouring properties would not be materially affected from unacceptable levels of air, noise and light pollution.

6.7 Parking and Highways

- 6.7.1 Local Plan Policy SP7 states that the Council aims to tackle climate change, improve local place shaping and public realm, and environmental and transport quality and safety by promoting public transport, walking and cycling. Policy T2 of

the London Plan states that development proposals should promote walking and cycling and should reduce car dominance. This approach is continued in Policies DM31 and DM32 of the DM DPD.

- 6.7.2 Policy T6 of the London Plan states that car free development should be the starting point for all development proposals that are well-connected by public transport.
- 6.7.3 The site has a good public transport accessibility level (PTAL) of 5 due to its close proximity to Wood Green underground station and the high availability of bus routes in the vicinity.
- 6.7.4 The Council's Transportation Officer has considered the potential parking and highway impact of this proposal and their comments are referenced in the assessment below.

Access Arrangements

- 6.7.5 All pedestrian, cycle and vehicular access would be via Coldham Court. The Transportation Officer raises no objections to this arrangement. Swept path diagrams have been provided that show that vehicles will be able to manoeuvre satisfactorily into, within and out of the site. An emergency access would also be provided onto the petrol station forecourt area.

Car Free Development and Accessible Parking

- 6.7.6 The proposed development would be car-free except for two wheelchair-accessible parking spaces provided at the front of the site (accessed off Coldham Court car park). Both parking spaces would be provided with electric vehicle charging points. The site is located within the Wood Green Outer Controlled Parking Zone (CPZ), which means it is eligible to be car free development given the site's PTAL.
- 6.7.7 Residents of the development would not be able to request on-street parking permits and this can be secured by legal agreement. Visitor parking could be accommodated on local streets. Residents would also not be eligible to use the existing car parking spaces on Coldham Court and details of how this would be managed must be secured through a car parking management plan secured by condition.

Cycle Parking

- 6.7.8 Policy T5 of the London Plan requires residential development to provide one cycle parking space per one-person dwelling (or studio flat), 1.5 spaces per two-person dwelling and two spaces for each unit with two or more bedrooms. Two spaces are also required for 'short stay' visitor parking for a development of this size.

- 6.7.9 The proposed development would provide 30 long-stay and 2 short-stay cycle parking spaces, which is in line with the minimum London Plan cycle parking standards. Larger cycles are catered for within the cycle store and the number of doors between the residential access and the cycle store has been kept to a minimum. Compatibility with the London Cycle Design Standards will be sought by condition.

Waste Management, Deliveries and Servicing

- 6.7.10 The Council's Waste Management team has reviewed the size of the waste store and the collection methodology, which will be via Coldham Court as with existing collections for the Coldham Court flats, and considers these arrangements to be acceptable. A detailed delivery and servicing plan will be secured by condition. Details of construction works would also be secured by condition.
- 6.7.11 As such, it is considered that the application is acceptable in transport and parking terms, and in terms of its impact on the public highway.

6.8 Carbon Reduction

- 6.8.1 Policy SP4 of the Local Plan requires all new development to be zero carbon (i.e. a 100% improvement beyond Building Regulations Part L (2013)). The London Plan also supports this objective in Policy SI2. Policy DM21 of the DM DPD states that all new development will be expected to consider and implement sustainable design, layout and construction techniques.
- 6.8.2 The *Sustainability & Energy Statement* submitted with this application confirms that the proposed development has been designed to reduce carbon emissions in accordance with the energy hierarchy which requires the 'Be Lean' (energy reduction), 'Be Clean' (energy efficiency), 'Be Green' (renewable energy) and 'Be Seen' (monitoring) steps to be followed.
- 6.8.3 The proposed development incorporates a range of passive and active design measures to reduce the demand for energy. Solar photovoltaic panels at roof level will provide significant carbon savings via renewable energy. Air source heat pumps would provide heating to the residential properties. The development must be designed to enable a future connection to a district energy system when this is available. This can be secured by condition.
- 6.8.4 The applicant has demonstrated cumulative carbon savings of 73% for the development. The remaining carbon for this development must therefore be offset by way of a financial contribution at a rate of £95 per tonne over 30 years. This figure is currently estimated to be £17,744, which includes a 10% management fee.

Overheating

- 6.8.5 The development would include high g-value glazing, openable windows and enable cross ventilation to maximise the provision of low-energy heat reduction methodologies in the development. The Council's Carbon Reduction Officer supports these methodologies in principle. Further modelling of overheating is required to ensure the most up-to-date climate models and building regulations have been considered as part of the overheating mitigation for this development proposal, and to ensure all appropriate mitigation measures would be secured.
- 6.8.6 As such, the Council's Climate Change Officer has recommended that a revised overheating strategy is secured through condition.
- 6.8.7 Therefore, subject to conditions the application is acceptable in terms of its sustainability and carbon impact.

6.9 Flood Risk, Drainage and Waterways

- 6.9.1 London Plan Policies SI12 and SI13 require measures to reduce and manage flood risk and ensure sustainable drainage. Local Plan Policy SP5, and Policies DM24 and DM25 of the DM DPD, state that development shall reduce forms of flooding and implement sustainable urban drainage systems (SUDS) where possible to improve water attenuation, water quality, and local amenity.

Flood Risk and Drainage

- 6.9.2 The site is located within Flood Zone 1 and is therefore considered to have a low probability of flooding. The development would significantly improve drainage on site by providing a planted garden area and green roof on a site that was previously covered entirely by hardstanding. The Council's Local Lead Flood Authority Officer has assessed the proposed development and raises no objections to the scheme. Thames Water also raises no objections to the site drainage arrangements.

Moselle Brook Culvert

- 6.9.3 Policy DM28 states that new development must be set back at least 5 metres from any watercourse unless otherwise agreed by the Environment Agency. The applicant has considered the potential for de-culverting the Moselle Brook which is located at the southern end of the site, running east to west.
- 6.9.4 The site includes a very small part of the culverted watercourse. It is understood that most of the watercourse flows underneath the back gardens of the properties on Moselle Avenue. Naturalisation of the channel would not currently be possible on both sides of the watercourse due to the large amount of land this requires and the siting of the adjacent residential garden areas. Maintenance of any de-culverted area would also be required from these residential gardens. It is also

understood that water quality in the culvert is not of a quality that would be beneficial to the health of residents. As such, noting that full de-culverting is technically very difficult to achieve and is also not desirable in this location the Environment Agency has raised no objections to the proposed development. Instead, the land adjacent to the culvert can be used as amenity space for residents.

- 6.9.5 As such, it is considered that the proposal is acceptable in terms of its flood risk, drainage and impact on the culverted watercourse.

6.10 Biodiversity and Urban Greening

- 6.10.1 Policy DM21 of the DM DPD states that proposals should maximise opportunities to enhance biodiversity on site, including through appropriate landscaping measures. Policy G5 of the London Plan requires urban greening to be sought as a fundamental element of site and building design. The target for a predominantly residential development is an urban greening factor of 0.4.

- 6.10.2 The application site is entirely covered by existing building and hardstanding areas and as such there are no trees or landscaped features on the existing site. The proposal would provide a new landscaped garden area including extensive green roofs, new tree planting and hedging. In addition to the amenity grass area provided this gives the site an urban greening factor of 0.402 which meets the target set out in Policy G5.

- 6.10.3 Planting will be designed to be suitably robust with appropriate species installed that will thrive in an urban environment. Planting will be supported by management strategies that are to be secured by condition. The provision of new planting and green roof areas would also lead to a clear biodiversity net gain on the site. Further biodiversity improvements could be installed in the form of bird boxes. These can be secured by condition.

- 6.10.4 The Council's Tree Officer has reviewed the Arboricultural Tree Survey submitted with the application and agrees with its findings. The large sycamore tree adjacent to the site would not be impacted by the proposed development. The Tree Officer recommends conditions to ensure that the landscaped areas have appropriate plant species provided and a maintenance plan in place.

- 6.10.5 As such, the application would improve the site's biodiversity and provide new landscaping that meets the required urban greening policy targets. The proposal is therefore acceptable for these reasons.

6.11 Air Quality and Land Contamination

6.11.1 London Plan Policy SI1 states that developments should not lead to further deterioration of existing poor air quality or create unacceptable risk of exposure to poor air quality. The whole of the borough is an Air Quality Management Area.

6.11.2 Policy DM23 requires development proposals to ensure contamination is properly addressed and to carry out investigations to remove or mitigate any risks to local receptors.

6.11.3 The development would be air quality neutral with respect to both building-related and transport-related emissions. The Phase I Site Appraisal submitted with the application has indicated that there is a low to moderate risk of contamination at this site. The moderate risks are potentially from hydrocarbon contamination buried in the soil. The Council's Pollution Officer has assessed the submitted documentation and raises no objections subject to a suite of conditions that would secure further ground investigations with associated reporting and monitoring in order to mitigate these risks, detailed demolition and construction management plans, and limits to the emissions from site equipment. As such, the Pollution Officer has raised no objections to the proposal in respect of its contamination risks.

6.11.4 Therefore, this application is acceptable in terms of its impact on air pollution and land contamination, subject to conditions.

6.12 Fire Safety

6.12.1 Policy D12 of the London Plan states that all development proposals must achieve the highest standards of fire safety. To this effect major development proposals must be supported by a fire statement.

6.12.2 The Fire Statement submitted with the application confirms the building would be provided with an evacuation lift. Fire vehicles would access the site via Moselle Avenue and Coldham Court. The building would be finished in natural brick which is a highly fire-rated material.

6.12.3 As such, the application is acceptable in respect of its fire safety.

6.13 Conclusion

- The development would be acceptable in land use terms as the loss of employment floorspace would be outweighed by the provision of much needed new affordable housing on a small non-designated employment site that is no longer suitable for modern employment purposes within a predominantly residential area.

- The development would provide a high-quality design that reflects the character and appearance of the surrounding area and preserves and enhances the setting of the nearby conservation areas.
- The development has been designed to ensure that a redevelopment of the adjacent petrol station can come forward in the future, without prejudicing the ongoing use of the petrol filling facilities in the short term in accordance with Agent of Change principles.
- The development would provide 17 new high-quality affordable residential units in a suitable mix of housing, including 11% family-sized homes and 11% wheelchair accessible homes, that would contribute to the provision of mixed and balanced communities in the local area.
- The development would not have a material adverse impact on the amenity of adjoining residential occupiers. The internal layout of the development would be of an acceptable quality.
- Car-free development (except for two wheelchair-accessible parking spaces) is acceptable in this highly sustainable location and would be supported by an appropriate number of cycle parking spaces within dedicated, secure and covered storage areas.
- The development would incorporate measures to minimise carbon on-site and would provide an appropriate carbon off-setting payment, in addition to securing other sustainability measures including solar panels, a green roof, on-site planting and biodiversity improvements.
- All other relevant policies and considerations, including equalities, have been taken into account.

6.13.1 All other relevant policies and considerations, including equalities, have been taken into account. Planning permission should be granted for the reasons set out above. The details of the decision are set out in the RECOMMENDATION.

6.14 Community Infrastructure Levy

6.14.1 Based on the information submitted with the application the Mayoral and Haringey CIL charges would be nil as the development is for 100% affordable housing and would be eligible for social housing relief.

6.14.2 CIL charges can be subject to surcharges for failure to assume liability, for failure to submit a commencement notice and/or for late payment. An informative will be attached to the decision notice advising the applicant of the above stated position on CIL charges.

7 RECOMMENDATION

7.1.1 GRANT PERMISSION subject to conditions and subject to s.106 Legal Agreement.