

REPORT FOR CONSIDERATION AT PLANNING SUB-COMMITTEE

1. APPLICATION DETAILS

Reference No: HGY/2022/0967

Ward: Bruce Castle

Address: 313 The Roundway and 8-12 Church Lane N17 7AB

Proposal: Demolition of existing buildings and erection of a three to five storey building with new Class E floorspace at ground floor and residential C3 units with landscaping and associated works.

Applicant: Mr Lee Fitzpatrick Hillview Developments

Ownership: Private

Officer contact: Christopher Smith

Date received: 16/03/2022

1.1 The application is being reported to the Planning Sub-Committee for determination as it is a major planning application.

1.2 SUMMARY OF KEY REASONS FOR RECOMMENDATION

- The proposed development would meet the requirements of Site Allocation SA63 by providing a mixed-use residential and commercial development and an east-west pedestrian and cycle route on this vacant and derelict site.
- The development would provide 76 new homes including 13 affordable homes (21% by habitable room), including nine three-bedroom homes (12%). This is the maximum reasonable of affordable housing and provides a satisfactory mix of unit sizes.
- The development would include new Class E commercial floorspace fronting onto Roundway that would provide a significant uplift in the number and quality of jobs on site.
- The development would be of a high-quality design that would substantially improve the appearance of the existing vacant and derelict site and would respect the visual quality of the local area. The development has general support from the Council's Quality Review Panel.
- The public benefits that would arise from the provision of a significant number of new housing and affordable housing units, substantial improvements in the visual quality of this long-term derelict and vacant site and its associated public realm improvements, and the provision of improved local connectivity to and from Bruce Castle Park via the new east-west route are considered to outweigh the development's moderate level of less than substantial harm to the significance of local heritage assets.

- The development would provide high-quality residential accommodation of an appropriate size, mix and layout within a well-landscaped environment, and would also provide new amenity and children's play spaces of an appropriate size and functionality.
- The development would not have a material negative impact on the occupiers of nearby residential properties in respect of a loss of sunlight and daylight, outlook or privacy, nor in terms of excessive levels of noise, light or air pollution.
- The development would include four on-street wheelchair-accessible car parking spaces and other sustainable transport initiatives would be secured including access to a car club and high-quality cycle parking.
- The development would achieve an 60% reduction in carbon emissions through a range of measures to maximise its sustainability and minimise its carbon emissions. The development would achieve a suitable urban greening factor and would result in a net gain in biodiversity on the site.
- All other relevant policies and considerations, including equalities, have been taken into account.

2 RECOMMENDATION

- 2.1 That the Committee resolve to GRANT planning permission and that the Head of Development Management or the Assistant Director of Planning, Building Standards & Sustainability is authorised to issue the planning permission and impose appropriate 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 30th November 2021 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) Drawing numbers
- 3) Use Classes
- 4) Materials
- 5) Roof plant details

- 6) Secured by design
- 7) Lighting
- 8) Ecology
- 9) Landscaping
- 10) Cycle parking
- 11) Deliveries and servicing
- 12) Contamination
- 13) Remediation
- 14) CEMP
- 15) Piling
- 16) Fire strategy
- 17) Air quality assessment
- 18) Play space
- 19) Digital connectivity
- 20) Arboricultural method statement
- 21) Highway condition survey
- 22) Route access controls
- 23) Block D access controls
- 24) Boundary treatments
- 25) RSA Stage 2
- 26) Energy strategy
- 27) DEN connection
- 28) Energy monitoring
- 29) Overheating – residential
- 30) Overheating – non-residential
- 31) Building user guide
- 32) BREEAM
- 33) Living roofs
- 34) Surface water drainage
- 35) Drainage management
- 36) Wheelchair user dwellings
- 37) Television antenna/satellite dish
- 38) Plant noise
- 39) Considerate contractor

Informatives

- 1) Proactive relationship
- 2) CIL
- 3) Signage
- 4) Naming and numbering
- 5) Asbestos survey
- 6) Water pressure
- 7) Designing out crime
- 8) Environmental permit
- 9) Noise levels

Section 106 Heads of Terms:

- 1) Affordable housing
 - 21% by habitable room
 - 8 affordable rented homes
 - 5 shared ownership homes

- Early-stage review if no work commenced within two years
 - Late-stage review
- 2) Car club contributions
 - Each new dwelling to be provided with a contribution of max. £100 per unit towards use of a car club
 - 3) Travel plans
 - Residential travel plan
 - Workspace travel plan
 - Monitoring costs at £1,000 per travel plan per year for five years (£10,000)
 - 4) Electric vehicle charging
 - One active EV charging point provided to an off-site parking space
 - Remainder of parking spaces to be fitted with 'passive' EV provision
 - 5) Highway works to be secured through a s278 agreement
 - 6) Wayfinding strategy
 - Details of signage on and to the new east-west route
 - 7) New public route through the site
 - Management and maintenance arrangements
 - 8) Architect retention
 - 9) Employment and skills plan
 - Plus appropriate contribution to be confirmed
 - 10) Carbon offsetting £91,171.50
 - Energy strategy review on occupation
 - Final offsetting figure can then be reviewed
 - 10% management fee also required
 - 11) Monitoring
 - 5% of total financial heads (excluding carbon offset)
 - £500 per non-financial head
 - Estimated £4,000 (plus 5% of E&S contribution)

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 the provision of affordable housing. As such, the proposal is contrary to Policy DM13 of the Development Management DPD 2017, Policy SP2 of the Local Plan 2017 and Policy H4 of the London Plan.

2. The proposed development, in the absence of a legal agreement to work with the Council's Employment and Skills team and to provide other employment initiatives would fail to support local employment, regeneration and address local unemployment by facilitating training opportunities for the local population. As such, the proposal is contrary to Policy SP9 of Haringey's Local Plan 2017.
 3. 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.
 4. The proposed development, in the absence of a legal agreement securing measures to retain the existing architects, could result in a significant reduction in the completed design quality of the development. As such, the proposal would be contrary to Policy D3 of the London Plan, Local Plan 2017 Policy SP11 and Policy DM1 of the Development Management DPD 2017.
 5. The proposed development, in the absence of a legal agreement securing sustainable transport measures and public highway works, would have an unacceptable impact on the safe operation of the highway network, give rise to overspill parking impacts and unsustainable modes of travel. As such, the proposal would be contrary to London Plan Policies T1, T2, T6, T6.1 and T7, Spatial Policy SP7, Tottenham Area Action Plan Policy NT5 and DM DPD Policy DM31.
- 2.7 In the event that the Planning Application is refused for the reasons set out in resolution (2.6) above, the Head of Development Management (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 SITE LOCATION DETAILS

Proposed development

- 3.2 This planning application is for the redevelopment of the existing partially vacant and derelict land on Roundway and Church Lane to form a three to five storey development providing 76 new homes (Use Class C3), 600sqm of commercial space (Use Class E), a new pedestrian and cycle route through the site, communal amenity and play space, cycle parking and new hard and soft landscaping.



- 3.3 The development would include 21% affordable housing by habitable room. 12% of homes would have three bedrooms. All homes would meet national space standards. 80% of the homes are dual aspect. The roof areas would include shared amenity and play spaces that can be accessed by occupants of all dwellings.
- 3.4 Four 'Blue Badge' car parking spaces are proposed on the public highway on Church Lane. 165 cycle parking spaces would also be provided. The development would include an east-west pedestrian route improving connectivity for pedestrians from The Roundway to Church Lane and Bruce Castle Park.
- 3.5 The development includes photovoltaic panels and air source heat pumps. The proposal has a contemporary design using materials that are sympathetic to its historic surroundings. Buildings would be finished in buff brick with terracotta detailing, a grey metal-clad roof and metalwork balcony railings and balustrades.

Site and Surroundings

- 3.6 The application site is an angular land parcel located within the street block that is demarcated by The Roundway (west), Church Lane (east), Lordship Lane (south) and All Hallows Road (north). The site includes the vacant and derelict 315 The Roundway and 8 Church Lane sites, plus 313 The Roundway and 12 Church Lane which are currently occupied by vehicle storage and servicing businesses.
- 3.7 To the north of the site fronting onto The Roundway is a Shell petrol station. Behind the petrol station is a car wash facility. To the north fronting onto Church Lane is the Rising Stars nursery and day care centre. To the south of the site is the Spurz Autos vehicle garage and an electrical substation.
- 3.8 The wider surrounding area has a varied character. To the west is The Roundway, its associated planted verges and the two storey Peabody Cottages estate. To the south are two and three storey properties with commercial space at ground floor and residential accommodation above. To the north are two storey homes and a primary school on All Hallows Road. The Bruce Castle Museum and Park are located to the east.
- 3.9 The application site is located partly (12 Church Lane only) within the Bruce Castle Conservation Area (BCCA), which extends eastwards into Bruce Castle Park and to the north and south-east of the site. To the east of the site the Bruce Castle Museum and Tower are both Grade I Listed. The wall that is located between the Museum/Tower and the application site is Grade II Listed. The nursery which is adjacent to the site to the north is locally listed.
- 3.10 To the south of the site are several locally listed buildings on Lordship Lane, which includes the Elmhurst Public House (no. 129) at the corner with Broadwater Road. To the west of the site, the Peabody Cottages residential estate forms the Peabody Cottages Conservation Area.
- 3.11 Further to the north are the All Hallows Church and Vicarage Priory which are Grade II* Listed. The wall south of Bruce Castle Park is also Grade II Listed. To the north-west Risley Primary School is locally listed.
- 3.12 The application site forms the central part of Site Allocation SA63 of the Site Allocations DPD 2017 which has been identified for mixed use commercial and residential development and the provision of an east-west route.
- 3.13 The site is located within an Archaeological Priority Area, a Flood Zone 1 (low risk) and a Groundwater Source Protection Zone. Adjacent to the site area a Blue Ribbon Network (Culverted Moselle River to the south), a Metropolitan Open Land, Historic Park and Grade II Site of Importance for Nature Conservation (all Bruce Castle Park to the east).
- 3.14 The site is marginally within the linear local view no.19 Bruce Castle to Alexandra Palace.
- 3.15 The site has a public transport accessibility level (PTAL) of 3 to 5 (where 6 is best).

Relevant Planning History

- 3.16 As the application site currently includes several parcels of land in multiple ownerships, this application has a complex planning history including many

applications for minor works and extensions have not been referenced below as they are not relevant to this application. Relevant applications since 2002 are described below.

315 The Roundway

- 3.17 HGY/2015/1297. Extension of existing time-limited permission No.HGY/2013/2550 for change of use of the site as both works offices and storage and amenity facilities in connection with refurbishment works to Circle 33 properties. Refused 30th June 2015. (*Land Between 315 The Roundway & 52 Lordship Lane*)
- 3.18 HGY/2013/2550. Temporary permission for change of use of the site as both works offices and storage and amenity facilities in connection with refurbishment works to Circle 33 properties. Permission granted 29th January 2014. (*Land Between 315 The Roundway & 52 Lordship Lane*)
- 3.19 HGY/2005/1992. Demolition of existing garages and erection of 1 x 4 storey block comprising 13 x one bed, 35 x two bed, 1 x three bed and 4 x four bed flats. Provision of 20 car parking spaces, 3 motorcycle spaces and 25 bicycle spaces. Withdrawn 7th June 2006. Appeal dismissed 19th September 2006.
- 3.20 HGY/2005/0274. Demolition of existing garages and erection of 1x4 storey and 1 x part 3 /part 4 storey blocks comprising of 56 x one, two, three and four bedroom flats and maisonettes. Provision of 18 car and 4 motorcycle spaces and bicycle storage. Refused 11th May 2005. Appeal dismissed 19th September 2006.

12 Church Lane

- 3.21 HGY/2002/0779. The erection of a first-floor side/rear extension. Permission granted 31st July 2002.

52 Lordship Lane

- 3.22 HGY/2010/1977. Addition of MOT station to existing garage. Permission granted 22nd March 2011.
- 3.23 HGY/2010/1933. Addition of hand car wash facilities to forecourt of existing garage. Refused 7th December 2010.

4 CONSULTATION RESPONSE

4.2 Quality Review Panel

- 4.3 The scheme has been presented to Haringey's Quality Review Panel on two occasions. The most recent Review was on 2nd March 2022. The Panel's written responses are attached in Appendix 6.

4.4 Planning Committee Pre-Application Briefing

- 4.5 The proposal was presented to the Planning Sub-Committee at a Pre-Application Briefing on 7th February 2022. The minutes are attached in Appendix 7.

4.6 Development Management Forum

4.7 A DM Forum was held on 23rd February 2022. The main topics raised were height, massing and design quality, impact on nearby heritage assets, impact on residential amenity and construction works management. Details and summaries of the comments made and responses are available in Appendix 8.

4.8 **Planning Application Consultation**

4.9 The following were consulted regarding the application:

Internal

4.10 LBH Design: No objections.

4.11 LBH Conservation: No objection in principle to the development. The proposal would detract from the surrounding historic built environment. The harm that would be caused is towards the moderate level of less than substantial harm.

4.12 LBH Housing: No objection.

4.13 LBH Transportation: Some concerns are raised which are addressed in the relevant section of the report below.

4.14 LBH Carbon Management: No objections, subject to conditions and obligations.

4.15 LBH Regeneration: No objections.

4.16 LBH Nature Conservation: No objections, subject to conditions. Landscape and ecological management plan, CEMP.

4.17 LBH Tree Officer: No objections, subject to conditions.

4.18 LBH Flood and Water Management: No objections, subject to conditions.

4.19 LBH Waste Management: No objections.

4.20 LBH Pollution: No objections, subject to conditions.

4.21 LBH Noise: No objections, subject to conditions.

4.22 LBH Building Control: No objections.

External

4.23 Historic England: No comments to make.

4.24 Historic England Greater London Archaeological Advisory Service: No archaeological investigation is required.

4.25 Transport for London: No objections, subject to conditions.

4.26 London Fire Brigade: No comments received.

- 4.27 Environment Agency: No objections, subject to an informative.
- 4.28 Thames Water: No objections, subject to conditions and informatives.
- 4.29 Metropolitan Police Designing Out Crime Officer: No objections, subject to conditions and an informative.

5 LOCAL REPRESENTATIONS

- 5.1 The application has been publicised by way of a press notice, several site notices which were displayed in the vicinity of and around the site and 266 individual letters sent to surrounding properties. The number of representations received from neighbours, local groups, etc in response to notification and publicity of the application were as follows:

No of individual responses: 5
Objecting/Commenting: 3
Supporting: 2

- 5.2 The following local groups/societies (other than those consulted above) made representations:

- Friends of Bruce Castle

- 5.3 The following issues were raised in representations that are material to the determination of the application and are addressed in the next section of this report:

- Excessive size and scale
- Inappropriate design
- Out of keeping with local character
- Negative impact on local heritage
- Insufficient parking provision

- 5.4 The following issues raised are not material planning considerations:

- Alternative designs should be considered (officer note: this application must be considered on the basis of the designs put forward by the applicant)

6 MATERIAL PLANNING CONSIDERATIONS

Statutory Framework

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

Considerations

- 6.2 The main planning considerations raised by the proposed development are:

1. Principle of development
2. Affordable housing and housing mix

3. Design and appearance
4. Heritage impact
5. Residential quality
6. Impact on neighbouring amenity
7. Transport and parking
8. Urban greening and ecology
9. Carbon Reduction and sustainability
10. Flood risk and water management
11. Land contamination
12. Fire safety

Principle of development

National Policy

- 6.3 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

- 6.4 The London Plan 2021 Table 4.1 sets out housing targets for London over the coming decade, setting a 10-year housing target (2019/20 – 2028/29) for Haringey of 15,920, equating to 1,592 dwellings per annum.
- 6.5 London Plan Policy H1 states that boroughs should optimise the potential for housing delivery on all suitable and available brownfield sites.
- 6.6 London Plan Policy H4 requires the provision of more genuinely affordable housing on development sites with major developments required to follow the Mayor’s threshold approach.
- 6.7 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

- 6.8 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.
- 6.9 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. Policy SP8 states that the Council will protect non-designated employment sites and secure a strong economy in Haringey.

- 6.10 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.
- 6.11 Policy DM40 states that on non-designated employment sites the Council will support proposals for mixed-use development where this is necessary to facilitate the regeneration of existing employment floorspace and that to achieve this, developments should meet the requirements of Policy DM38 which requires new employment space to be maximised. Policy DM41 states that proposals for new retail uses outside of town centres should demonstrate that there are no suitable town or edge-of-centre sites available in the first instance and demonstrate that they would not harm nearby town centres.
- 6.12 The application site forms part of site allocation SA63 (The Roundway) in the Site Allocations DPD 2017 (SADPD). SA63 is identified as being suitable for new mixed-use development that is sympathetic to the nearby Bruce Castle and also provides an east-west pedestrian and cycling connection.
- 6.13 SA63 has the following Site Requirements and Development Guidelines:

Site Requirements

- Development proposals will be required to be accompanied by a site wide masterplan showing how the land included meets this policy and does not compromise co-ordinated development on the other land parcels within the allocation. Development proposals will be required to be accompanied by a site wide masterplan showing how the land included meets this policy and does not compromise coordinated development on the other land parcels within the allocation in line with Policy DM55.
- The existing employment floorspace on this site should be replaced wherever feasible. Residential will be permitted on this site to make viable the renewal of the employment stock.
- No buildings need to be retained, but the Parkside Prep school should not be compromised through any redevelopment.
- Development on this site should enhance the setting of Bruce Castle, including access to Bruce Castle Park.
- Affordable rent may be sought having regard to the viability of the scheme as a whole will be expected in this area in line with Policy DM38.

Development Guidelines

- Heights should be limited adjacent to the nursery and the existing houses to the north of the site.

- In line with policy SP9, if redevelopment results in a net loss of employment floorspace, a financial contribution may be required as set out in the Planning Obligations SPD.
- The building hosting the electricity substation on Church Lane is of some historic value, and while a comprehensive approach to the site is encouraged, a new use for this building could be considered.
- New development should attempt to continue the street frontages on all sides and should respect the scale of terraces within the Peabody Estate Conservation Area.
- Layout of new development should complement or respond to established 'back to back' terrace layout of the Peabody cottages.
- New development should be of high quality and enhance the setting of both the Conservation Areas and the Grade I Listed Bruce Castle.
- Whilst not listed on its own right, Bruce Castle Park is an important heritage as well as community asset. Development should contribute to and enhance its setting.
- The prominent location attributes itself to an opportunity to create a visible architectural landmark, marking the entrance and setting of Bruce Castle. It could act as a 'wayfinder' for the heritage assets nearby.
- This should be achieved not necessarily by height but by virtue of its design and should be such that it is not intrusive to the setting of Bruce Castle or its grounds.
- This site is in a groundwater Source Protection Zone and therefore any development should consider this receptor in any studies undertaken. Studies should be undertaken to understand what potential contamination there is on this site prior to any development taking place and where appropriate, a risk management and remediation strategy.
- A piling statement will be required prior to any piling taking place.
- The site has potential for significant archaeology, given its location opposite Bruce Castle and within the historic medieval core, which will require assessment.

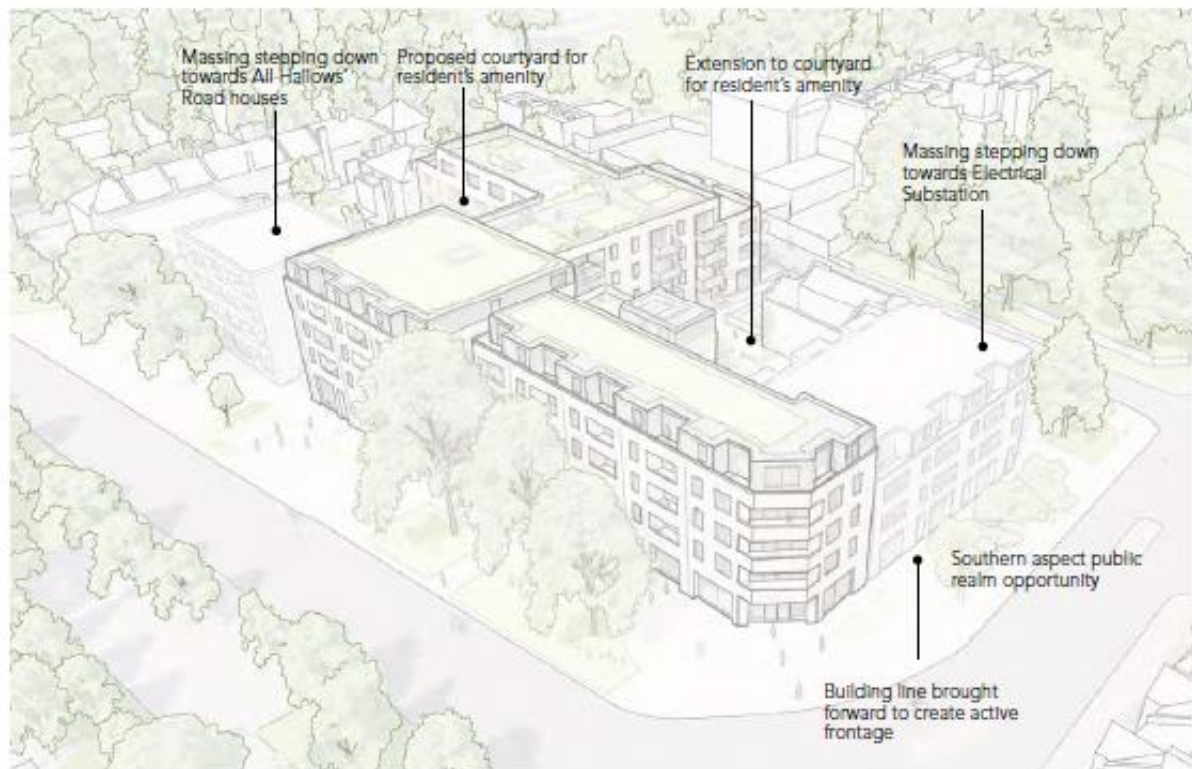
Housing Supply

- 6.14 The Council at the present time is unable to fully evidence its five-year supply of housing land. 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 for decision-taking 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).

Assessment

Site Allocation and Masterplanning

- 6.15 Policy DM55 of the Development Management DPD states that where developments form only a part of allocated sites a masterplan shall be prepared to demonstrate that the delivery of the site allocation and its wider area objectives would not be frustrated by the proposal.
- 6.16 This application relates to the central part of site allocation SA63 only. The remaining land within SA63 is occupied by the Shell Petrol Station and a car wash (north of the site), the Spurz Autos vehicle garage (south of the site) and an electricity sub-station (south-east of the site). The applicant has made attempts to bring those landowners into this development proposal but that has not been possible at this time.



- 6.17 The application is supported by a masterplan that shows how adjacent sites could be developed to provide a site allocation-wide development. The masterplan proposal would step down in height towards its corners which is consistent with the approach taken by the proposed development.
- 6.18 The masterplan design and layout shows that the site allocation requirements and development guidelines could be met on the adjoining sites in conjunction with this proposal. As such, it is considered that the masterplan shows that the development would not prejudice the delivery of the site allocation and its wider objectives and is therefore compliant with Policy DM55.

Provision of Non-Residential Uses

- 6.19 The site allocation SA63 requires mixed-use development on the site. Policy DM40 states that non-designated employment sites in accessible locations are suitable for mixed-use developments that regenerate employment floorspace, in accordance with Policy DM38.

- 6.20 Policy DM38 requires new regenerative employment-related development to: maximise the amount of employment floorspace, provide improvements in the suitability of the site for continued employment use with regard to key indicators such as jobs, flexibility of floorspace provided and environmental quality of the site; provide affordable workspace where viable; ensure residential amenity and retained employment space functionality is protected, and; provide access to high quality broadband connection.
- 6.21 The application site contains various buildings and yards which relate to the car storage and service industries. Two of these sites are currently vacant. The lack of activity and derelict nature of much of the land and many buildings on the site has been prominent in the locale for many years. The site is surrounded by hoardings in part and one of the buildings on site has been subject to severe fire damage.
- 6.22 The employment land on existing sites totals 1,192sqm of gross internal area (GIA). 415sqm of this is currently vacant. The remaining active 777sqm of commercial floor space employs a low number of staff (4) due to the nature of the uses as vehicle servicing and storage uses.
- 6.23 The proposed development would provide 600sqm of new employment space in the form of flexible Class E floor space. This is currently anticipated to be in the form of workspace and a retail unit. The applicant has requested flexibility in the exact final uses to ensure they would be occupied. It is understood that these end uses would provide 30-50 new jobs at the site.
- 6.24 Despite the overall reduction in floorspace it is considered that the proposed development would maximise the new employment on site by providing flexible Class E uses along the whole available street frontage on the Roundway. The number and quality of jobs would significantly increase, as described above. The environmental quality of the site would improve substantially. Residential amenity would be protected through conditions and the functionality of existing employment activities respected. Broadband connections would be secured through condition.
- 6.25 No affordable workspace has been secured due to viability constraints. The financial viability of the development is discussed further in the sections below.
- 6.26 As such, the provision of regenerated employment activities at this site is compliant with Policy DM40 and is therefore considered acceptable.
- 6.27 Provision of New Housing
- 6.28 The Council's housing target as set by the London Plan is 1,592 dwellings per annum. London Plan Policy H1 states that boroughs should optimise the potential for housing delivery on all suitable brownfield sites. Local Plan Policy SP2 states that the Council will aim to provide homes to meet Haringey's housing needs and will make the full use of Haringey's capacity for housing by maximising the supply of additional housing.
- 6.29 Policy DM10 of the DM DPD states that the Council will support proposals for new housing on sites allocated for residential development.
- 6.30 This number of new homes is a significant contribution towards the Council's housing target as described above and is in accordance with housing policies including Policy

SP2, DM10 and site allocation SA63. As such, the provision of housing on this site is acceptable in principle.

Affordable housing and housing mix

Affordable Housing Provision

- 6.31 Policy DM13 of the DM DPD states that developments with capacity to accommodate more than ten dwellings should provide affordable housing, and that the maximum reasonable amount of affordable housing provision will be sought on site. The policy requires that 40% affordable housing is sought on a borough-wide basis and that there is a preference for a 60:40 split of affordable rented properties to intermediate housing. The policy continues to state that the Council must have regard to development viability and individual site circumstances when considering the affordable housing offer for specific development proposals.
- 6.32 The Mayor of London's Affordable Housing and Viability SPG provides detailed guidance to ensure that existing affordable housing policy is as effective as possible. The SPG states that all developments not meeting a 35% affordable housing threshold must be assessed for financial viability through the assessment of an appropriate financial appraisal, with early and late-stage viability reviews required where appropriate.
- 6.33 13 new affordable homes (21% by habitable room) would be provided within a single block (Block B). The homes would be provided in a 'tenure blind' manner by ensuring the proposed development is designed so the affordable homes would be indistinguishable from the market homes. The affordable homes would be provided as 8 affordable rent and 5 shared ownership homes. Affordable housing is considered in more detail in the sections below.
- 6.34 The application is supported by a Financial Viability Assessment Report. This has been independently assessed by the Council's appointed independent viability consultant BNP Paribas and it was concluded that there is a deficit against the development's viability benchmark. It is therefore considered that the maximum reasonable amount of affordable housing has been provided.
- 6.35 The site has the potential to accommodate a greater scale of development with a greater number of affordable homes however this would result in a greater impact on the surrounding heritage assets. Through the pre-application process where several options were considered, the scale of development proposed has been found to deliver the optimum balance between minimising heritage harm and maximising housing delivery.
- 6.36 The proposed split of affordable housing is shown in the table below:

Tenure	1 Bed Units	2 Bed Units	3 Bed Units	Total by Unit	Total by HR
Total Affordable	5	2	6	13	40
Shared Ownership	2	1	2	5	15
Affordable Rent	3	1	4	8	25

- 6.37 The table shows an affordable split of 62.5% affordable rent homes and 37.5% shared ownership homes, calculated by habitable room. This split of affordable homes is generally compatible with the requirements of Policy DM13 as well as the Council's policy preference for affordable rented homes in this part of Haringey.
- 6.38 Six of the affordable homes (46%) would be family-sized properties with four (30%) of these as affordable rented homes.

Housing Mix

- 6.39 Policy DM11 of the DM DPD states that the Council will not support proposals which result in an over concentration of one or two bedroom units overall unless they are part of larger developments.
- 6.40 There are nine (12%) three-bedroom homes with the development proposal which is an acceptable proportion of family-sized homes. The site is in a highly accessible location with Bruce Grove station and several bus stops close by and there is limited parking availability in local streets, which makes the site more suitable for smaller households that can rely on sustainable transport modes and do not require associated parking. There are already a significant number of family homes in the local area including in the Peabody Cottages estate, All Hallows Road, Broadwater Road and Lordsmead Road as well as on Lordship Lane to the west. As such, the provision of mostly one and two bedroom properties in this location is supported.
- 6.41 As such, the proposed development would be acceptable in terms of providing the maximum reasonable amount of affordable housing and in terms of its overall housing mix.

Design and appearance

National Policy

- 6.42 Chapter 12 of the NPPF 2021 states that that good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.
- 6.43 It states that, amongst other things, planning decisions should ensure that developments function well and add to the overall quality of the area and should be visually attractive due to good architecture, layout and appropriate landscaping.

Regional Policy - London Plan

- 6.44 London Plan 2021 Policy D3 emphasises the importance of high-quality design and seeks to optimise site capacity through a design-led approach. Policy D4 of the London Plan notes the importance of scrutiny of good design by borough planning, urban design, and conservation officers as appropriate. It emphasises the use of the design review process to assess and inform design options early in the planning process (as has taken place here).
- 6.45 Policy D6 concerns housing quality and notes the need for greater scrutiny of the physical internal and external building spaces and surroundings as the density of schemes increases due the increased pressures that arise. It also requires development capacity of sites to be optimised through a design-led process.

Local Policy

- 6.46 Policy SP11 of the Haringey Local Plan requires that all new development should enhance and enrich Haringey's built environment and create places and buildings that are high quality, attractive, sustainable, safe and easy to use.
- 6.47 Policy DM1 of the DM DPD requires development proposals to meet a range of criteria having regard to several considerations including building heights; forms, the scale and massing prevailing around the site; the urban grain; and a sense of enclosure. It requires all new development to achieve a high standard of design and contribute to the distinctive character and amenity of the local area.

Quality Review Panel (QRP)

- 6.48 The development proposal has been presented to the QRP twice prior to the submission of this application. The most recent review took place on 2nd March 2022. The Panel's summarising comments of this latest review are provided below.
- 6.49 *"The panel finds much to admire in the proposed design and offers some comments where it feels there is scope for refinement at a detailed level. It supports the scale and massing, the brick materiality, and welcomes the careful thought that has been given to landscape design. It feels that the architectural expression sits comfortably in the surrounding townscape, but would encourage a more confident approach to the southwest corner. It also suggests exploring semi-recessed balconies on the elevation facing Bruce Castle, and feels that entrances to Block D would be better located on Church Lane. The panel is confident that the design team will be able to address these minor comments, in consultation with planning officers."*
- 6.50 Since the date of the second review the proposal has been amended to address the most recent comments from the QRP. The table below provides a summary of key points from the most recent review, with officer comments following:

Panel Comments	Officer Response
Plan and layout of units in Block D	
The panel welcomes the improved layout of the units in Block D. Moving the living spaces to the east, facing onto Church Lane, will provide residents with views of the street and to Bruce Castle and the park beyond.	Comments noted.
While the panel appreciates the design team's consideration of the long-term masterplan there is no guarantee that the Shell Petrol Station site will be redeveloped.	Comments noted. This development is not reliant on the adjacent petrol station being redeveloped and policy DM55 supports this approach.
It feels that Block D would benefit from moving the entrances to the east, to activate Church Lane and improve the legibility of the homes for postal and other deliveries.	The entrance sequence for Block D has been redesigned. The rationale for siting the main entrance to the west is to locate amenity and habitable room areas onto the landscaped space off Church Lane rather than adjacent to the petrol station and car wash to the rear. A new gated entrance from

	Church Lane to the rear of Block D will provide a clear point of entry to this rear entrance area.
Architectural expression and materiality	
The panel supports the scale of the proposals and welcomes the visually 'polite' architecture which sits comfortably within the wider context of surrounding conservation areas.	Comments noted.
It welcomes the design development of the east façade facing Bruce Castle, but encourages further thought about integrating the balconies into the architecture.	The balconies projecting on the Church Lane elevation are now semi-recessed where they are closest to the street frontage to reduce their visual prominence. The detailed design of the balconies is supported by officers.
Semi-recessed balconies could respond more appropriately to the Grade I listed Bruce Castle, and would also partially screen any residents' belongings, which are often stored on balconies.	Comments noted. See above response.
The panel supports further development of the proposed metal railings. The inclusion of bespoke and distinctively crafted elements will add welcome visual interest and elegance to the scheme.	Metal railings to balconies and other design features such as balustrades now have a bespoke and distinctive design that is reflective of local heritage features.
It welcomes the presentation of the design options considered for the prominent southwest corner of the scheme, facing onto Lordship Lane, and supports the design team's decision to integrate the balconies with the brickwork.	Comments noted.
The panel noted the opportunity to enhance the architecture through the materials and detailing of the balcony soffits, particularly those on the Lordship Lane corner.	Comments noted. Further analysis of and refinement to this corner feature has occurred to reflect these comments the corner element on Lordship Lane would have a chamfered corner with a brick indent and a terracotta precast sill.
This corner would benefit from a more confident expression, and the panel would encourage exploration of different materials, more detailed brickwork, and/or the addition of an element of decoration.	The applicant has considered a range of designs for this corner feature and the design option included within the submitted development proposal is the preferred option of the Council's Design Officer and the QRP. The height of the corner cannot increase to ensure local heritage assets are protected.
The developing architecture and materiality have the potential to work well, with the specification of high-quality materials and carefully considered detail design.	Comments noted. The detailed design and materiality will be secured through an appropriately worded planning condition.
As part of this process, careful thought should be given to the location of the rooftop	PV panels would be accessed via roof level access points. The applicant has provided

photovoltaic panels and their ongoing maintenance. The aim should be to avoid visibility of the panels and/or any safety railings required to meet Health and Safety regulations.	assurances that the plant layout at roof level is accurate, and that no plant installations will be visible from surrounding streets. Detailed drawings to ensure this will be secured by condition.
Landscape design and parking	
The panel applauds the retention of mature trees on The Roundway, with enhanced planting, and similar attention to the landscape setting of the scheme on Church Lane.	Comments noted.
Because of this, it strongly supports the proposed location of the blue badge car parking on Church Lane. This allows space for trees and planting which will both enhance the streetscape, and quality of life for residents.	Comments noted.
Ground floor use	
The panel agrees with the decision to provide non-residential uses at ground floor level facing The Roundway.	Comments noted.
This is currently shown as workspace / retail on the plans. However, retail may not be successful given the low pedestrian footfall and the lack of car parking in the area.	Comments noted. The commercial spaces on Roundway shall be secured as flexible spaces within Class E which allows for exploration of different commercial options prior to occupation.
A restaurant or cafe may be more viable than retail and could also enliven the corner facing Lordship Lane.	Comments noted. There is flexibility for potential restaurant/café uses to be provided if there is demand through the flexible Class E use class.
Tenure	
The panel recommends that Block D is allocated to private sale units, to ensure that all potential occupants have a choice as to whether they live adjacent to the Shell Petrol Station car wash.	Block D would include private sale units, as would Blocks A and C. Block B would be for the affordable homes.

- 6.51 As set out above, the applicant has sought to engage with the QRP during the pre-application stage. The development proposal submitted as part of this application has evolved over time to respond to the detailed advice of the panel. It is considered the points raised by the QRP have been addressed to an appropriate extent.

Assessment

- 6.52 The existing depot site is in significant need of improvement. It consists of a number of derelict car repair workshops and yards. The site characteristics change significantly from one side of the site to the other, with Lordship Lane and The Roundway being

part of a wide and busy main road (A10) and Church Lane having a narrow street width with very low levels of vehicle traffic.

Layout

- 6.53 The Council's Design Officer notes that the proposed development is laid out in the form of modest mansion blocks, with commercial uses on the ground floor fronting The Roundway and residential properties above. Blocks C and D to the northern part of the site would be separated from Blocks A and B to the south by a new public route which would cut across the site east to west. This route provides access benefits to the development, as ground floor properties would be accessed directly from it, and also improves local street permeability for pedestrians and cyclists. The alignment of this route would provide glimpsed views of Bruce Castle from the western access point to the route from The Roundway and would shorten routes from The Roundway to Bruce Castle Park. The route would be gated at night and management controls would be secured by condition.



Height, Bulk and Massing

- 6.54 The Council's Design Officer notes that the development would be four storeys in height with a set-back fifth storey when viewed from The Roundway and Lordship Lane and would have a lower three storey appearance, with a substantially recessed fourth floor behind it, when viewed from Church Lane. This represents a modest step up from the existing built form on Lordship Lane at the junction with The Roundway which includes three storey terraced properties with roof elements above. The substantial width of The Roundway means it has potential to accommodate a building greater than four storeys without compromising local residential amenity. On The Design Officer advises that the Roundway street frontage the strong elongated street frontage would make best use of the urban form in the area, with the mass of the building being reduced in local views through the integration of strong rhythm of window apertures, a wide recessed balcony and strong recessed downpipe features. The depth of the recesses at roof level would vary which reduces the bulk and massing of the building further.



- 6.55 The Design Officer notes that on Church Lane the scale is more restrained with the three storey height being a slight step up from the street frontage which features two storey and double-height commercial buildings. Opposite the site Bruce Castle Museum is a three storey building, parts of which feature large additional roof elements. As such, the development is a comparable height to this existing building. The bulk and massing of this elevation would be minimised through the integration of large and tall window apertures and a building frontage that varies in depth. The provision of a large tree-planted communal front garden of Church Lane would contribute to screening the bulk and mass of the buildings from local views on this road.



Detailed Design

- 6.56 The Council's Design Officer notes that the elevational treatment of the proposals is that of a restrained and polite brick-based architecture that would have a contemporary appearance that references and is compatible with its surrounding context. In particular, the two storey Peabody Cottages houses, the late nineteenth and early twentieth century larger houses in the locale, the nearby Elmhurst pub on Lordship Lane, the mansion blocks on Lordship Lane, and the Georgian and Victorian buildings of Church Lane, are all an influence on the proposed development design. Window and recessed balcony proportions along The Roundway would be horizontal, offset by a strong vertical rhythm of bays defined by recessed slots for rainwater pipes, with larger windows and regularly spaced doors to the ground floor commercial units providing a highly active frontage and a base to the overall structure. The recessed top floor would have a darker, metallic finish, providing a clear 'top' that distinctively terminates the building's height. Where The Roundway meets Lordship Lane the development would turn the corner with a feature that includes deep

overhangs and recessed brick panels, which would provide a modest but distinct celebration of this street corner.

- 6.57 The Design Officer notes that the architecture of the Church Lane frontage subtly changes, via the new internal courtyard, to become more vertically proportioned and more relaxed. It would have an elegant form highlighted with detailed design elements including precast terracotta copings, intricate metalwork railings, blind window features, and walled and planted front gardens. Balconies would be visually permeable. They would be semi-recessed close to Church Lane and fully projecting across the planted garden area, bringing greater amounts of animation and passive surveillance onto Church Lane.



6.58 Public Realm Improvements

- 6.59 The new east-west connection would provide public access to an internal courtyard that would be fitted with new seating, tree planting and other landscaping. Grass verges on The Roundway would be planted and existing trees protected. On Church Lane a large communal garden would be provided and residential front gardens would be provided with tree and other planting that would introduce new verdant features into the street scene. Shared roof gardens would be provided with attractive, robust and durable hard and soft landscaping.
- 6.60 The public realm improvements around this site would be substantial and would add further to the high design quality of this proposed development.
- 6.61 The Design Officer notes that the development proposal provides a fantastic opportunity to improve local access to Down Lane Park and create a stronger link to the wider Lee Valley to the east. The continuation of Ashley Road improves connectivity for pedestrians and cyclists significantly. The alignment of the secondary 'residential lane' through the centre of the site is strongly supported as a means of further improving connectivity for local residents to the park and as a means through which to provide a sensitively designed and characterful 'mews style' residential street. The proposed landscaped strips along the northern and western edges of Park View Road would integrate the proposed development into the existing street grid whilst retaining existing mature trees, improving landscaping to those streets and providing a more spacious streetscape, and therefore are strongly supported.
- 6.62 The proposed park street would provide east-west pedestrian and cycle connectivity as well as a much improved and planted setting for Down Lane Park. The new routes have clear and unambiguous boundaries between public and private spaces, with the proposed blocks enclosing private communal courtyard gardens, and with ground floors animated with regularly spaced, frequent front doors to ground floor properties. The street layout is therefore considered to be an exemplary provision of robust and comprehensible spaces in accordance with current best practice.



- 6.63 The Design Officer notes both the public streets and private communal courtyards would be provided with attractive, robust and durable hard and soft landscaping. The overwhelming majority of existing trees, many of which are fine mature samples, would be retained and protected. New street trees would supplement the retained trees to provide a continuous street tree lining to the Park View Road and Down Lane Park edges.
- 6.64 The new streets and paths through and around the site would be appropriately landscaped, accommodating mixtures of herbaceous and evergreen plants to provide year-round greenery and street furniture to support clear routes to front doors.
- 6.65 The public realm improvements around this site would be substantial and would add further to the high design quality of this proposed development.
- 6.66 Summary
- 6.67 The proposed development would replace a former Council depot site which is no longer required in this location, and which currently has a highly limited and low quality relationship with the surrounding area, with a series of buildings of high-quality contemporary design would have a well-considered and polite architecture and would not appear excessively large in scale, bulk and massing in the local street scene. It would be provided with new tree and landscaped areas, would increase permeability of the site for pedestrians and cyclists and would also be surrounded by new public landscaped areas.
- 6.68 As such, the proposed development would not appear out of keeping with the surrounding area. The overall development would have a positive visual impact on the local built environment and would bring significant improvements to the local public realm including the significant benefits provided from the renewal of visually prominent vacant and derelict land.
- 6.69 The scheme has been reviewed twice by Haringey's Quality Review Panel the latter of which "found much to admire in the proposed design" with just a small number of suggested refinements, which have all since been successfully resolved or explained.
- 6.70 The Council's Design Officer also supports the development and has stated that: *"As a whole, the proposals represent a huge improvement on the current site and a more than acceptable residential-led development of the site, securing employment and a public route across the site, providing an appropriate neighbour to precious significant heritage assets, and good quality homes."*
- 6.71 As such, it is considered that the development is acceptable in design terms.

Heritage impact

Legal Context

- 6.72 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”.

- 6.73 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.”
- 6.74 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.”
- 6.75 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.
- 6.76 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.
- 6.77 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.

Policy Context

- 6.78 London Plan Policy HC1 states that development proposals affecting heritage assets and their settings should conserve their significance. Local Plan Policy SP12 and Policy DM9 of the Development Management 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.

- 6.79 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. It also states that buildings projecting above the prevailing height of the surrounding area should conserve and enhance the significance of heritage assets, their setting, and the wider historic environment that could be sensitive to their impact.

Local Heritage Context

- 6.80 The application site is located partly (12 Church Lane only) within the Bruce Castle Conservation Area (BCCA), which extends eastwards into Bruce Castle Park and to the north and south-east of the site. To the east of the site are the Bruce Castle Museum and Tower which are both Grade I Listed. The wall that is located between the Museum/Tower and the application site is Grade II Listed. The nursery which is adjacent to the site to the north is locally listed.
- 6.81 To the south of the site are several locally listed buildings on Lordship Lane, which includes the Elmhurst Public House (no. 129) at the corner with Broadwater Road. To the west of the site, the Peabody Cottages residential estate forms the Peabody Cottages Conservation Area.
- 6.82 Further to the north are the All Hallows Church and Vicarage Priory which are Grade II* Listed. The wall south of Bruce Castle Park is also Grade II Listed. To the north-west Risley Primary School is locally listed.

Assessment of Impact on Heritage Assets and their Setting

- 6.83 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".
- 6.84 Section 16 of the NPPF states that, in determining applications, the following should be taken account of: (a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; (b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and (c) the desirability of new development making a positive contribution to local character and distinctiveness.
- 6.85 The NPPF continues to state that, when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). Any harm to, or loss of, the significance of a designated heritage asset should require clear and convincing justification. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

- 6.86 Furthermore, the NPPF states that the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.
- 6.87 The application site is currently mostly unoccupied and derelict. It is highly prominent in local views, given its siting on the corner of Roundway and Lordship Lane. The low quality of the existing site's built form therefore currently has a significant negative impact on local heritage character and consequently on the setting of nearby heritage assets. The site contains a large warehouse building and yard at 12 Church Lane which is formally identified as a detractor to the Bruce Castle Conservation Area.
- 6.88 The proposed development would introduce significant change to the setting of several heritage assets, most significantly the Grade I Listed Bruce Castle and Tudor Tower, the Bruce Castle and Peabody Cottages Conservation Areas, and locally listed buildings on Church Lane, Lordship Lane and the Roundway.
- 6.89 The height of the building would be two storeys greater than the majority of the surrounding townscape, given that most buildings in the area are of two storeys plus roof, whereas the proposed building is a maximum of four storeys plus a set-back fifth roof storey. The proposed building would have a continuous mass and scale that would increase its visual prominence in local views. The applicant undertook a detailed analysis of local views (as shown in the submitted *Built Heritage & Townscape Visual Impact Assessment*) at pre-application stage and different design iterations were presented to the Council for review at that stage. The scale and massing of the development as currently proposed was considered to minimise the impact on heritage assets whilst enabling enough residential units to be provided to ensure the development is financially viable (as well as meeting other relevant policy requirements).
- 6.90 The applicant has provided an analysis of key local views within a Built Heritage and Townscape Visual Impact Assessment submitted with the application. The increase in height and scale above existing heritage features in the area is particularly evident in Views 1 (Junction of Bruce Grove and Lordship Lane to Bruce Castle), 4 (Peabody Cottages) and 11 (Junction of Lordship Lane and The Roundway).



View 1: Junction of Bruce Grove and Lordship Lane

- 6.91 View 4 shows the impact the proposed building would have on the traditionally proportioned cottages of the Peabody Cottages Conservation Area (PCCA). The Council's Conservation Officer considers that the proposed development would appear prominent in views from the western end of the PCCA and would thereby detract from its special interest and setting. Views from within, and in certain areas (such as from Lordship Lane) of, Bruce Castle Park would also be affected as some parts of the proposed development would be visible in long and short views both above and behind Bruce Castle and its Tudor Tower. The proposed building would therefore detract to an extent from these landmark Grade I Listed buildings which are currently the most prominent buildings in the area from a heritage standpoint.



View 4: Peabody Cottages

- 6.92 The detailed design of the proposed development, in terms of its architecture and material finishes, is of a generally polite and unobtrusive contemporary building that responds to local heritage features. The building would be a substantial improvement on the appearance of the mostly vacant and derelict existing site, which has been an unsightly feature in the local built environment for a long time. The development would replace the low-quality building at 12 Church Lane, which is a detractor to the Bruce Castle Conservation Area, with a sensitively designed building that would improve the street scene on the whole of Church Lane.



View 11: Junction of Lordship Lane and The Roundway

- 6.93 The competing sensitivities of the various heritage assets in the local area means that producing a development that sufficiently respects and enhances each of these in turn is challenging. The proposed development is considered to have a significantly beneficial impact on the appearance of the application site. However, the Council's Conservation Officer considers that the proposed building is of a relatively simplistic contemporary architecture that fails to provide a sufficiently appropriate architectural language and detailing that would fully respond to the specific distinctiveness of all local heritage assets. However, the Quality Review Panel takes a different position, stating that there is 'much to admire in the design'. The QRP also state that 'the panel supports the scale of the proposals and welcomes the visually polite architecture which sites comfortably within the wider context.
- 6.94 Historic England are content for a decision on this application to be taken by the Council. The Council's Conservation Officer has assessed the proposal and a summary of their views is provided below:
- 6.95 *"Due to the height, mass and scale of the proposed development but also the proposed architectural language and detailing, it is considered that the proposal would detract from the surrounding built historic environment, particularly the Bruce Castle Conservation Area, the Bruce Castle and Tudor Tower and the Peabody Cottages Conservation Area. On balance, the harm that would be caused to the built historic*

environment is considered to be towards the moderate level of the less than substantial harm scale.”

Heritage Impact Summary

- 6.96 Noting that the Conservation Officer finds a moderate level of less than substantial harm the NPPF sets out that where there is less than substantial harm to the significance of heritage assets *“this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.”*
- 6.97 In terms of whether this proposal provides the optimum viable use, the development would provide new housing, including a proportion of affordable housing, and new commercial space that would provide an uplift in the number and quality of jobs on site. It would be in general accordance with the requirements of Site Allocation SA63 including the provision of improved connectivity through an east-west pedestrian and cycle link. It would regenerate a mostly derelict and vacant site that has been a prominent unsightly feature in the local built environment for a long time. Therefore, given a balanced assessment of the proposal’s heritage impact against its wider benefits to the local community, it is considered that the proposal would be acceptable in heritage conservation terms.
- 6.98 The Conservation Officer notes that it is possible that additional heritage impact could result from the size, siting and design of future roof level plant machinery and equipment which is not shown in detail on the submitted viewpoint imagery. To ensure that the development’s impact on the local heritage environment is limited a condition would be secured for details of how any plant machinery and equipment would appear in key heritage views to ensure they would not have a detrimental impact on heritage assets and their respective settings.

Archaeology

- 6.99 Policy HC1 of the London Plan states that development proposals should identify assets of archaeological significance and use this information to avoid harm or minimise it through design and appropriate mitigation. Policy DM9 of the DM DPD states that all proposals will be required to assess the potential impact on archaeological assets and follow appropriate measures thereafter in accordance with that policy.
- 6.100 The Greater London Archaeological Advisory Service (GLAAS) has been consulted on this application and advises that an archaeological investigation is not required.
- 6.101 As such, the proposed development would be acceptable in terms of its impact on heritage assets.

Residential quality

- 6.102 The Nationally Described Space Standards set out the minimum space requirements for new housing. The London Plan 2021 standards are consistent with these. London Plan Policy D6 requires housing developments to be of high-quality design, providing comfortable and functional layouts, benefiting from sufficient daylight and sunlight, maximising the provision of dual aspect units and providing adequate and easily accessible outdoor amenity space. It provides qualitative design aspects that should be addressed in housing developments.

- 6.103 The Mayor of London's Housing SPG seeks to ensure that the layout and design of residential and mixed-use development should ensure a coherent, legible, inclusive and secure environment is achieved. Standard 29 of the SPG requires the number of single aspect homes to be minimised, with north-facing single aspect properties avoided. Policy DM1 requires developments to provide a high standard of amenity for its occupiers.

General Residential Quality

- 6.104 In general terms, the development has a high-quality layout and residential standard, having been through a rigorous design process including several Quality Review Panels. All homes would meet the internal space and amenity space standards requirements of the London Plan. 80% of the proposed homes would be dual aspect and no single aspect homes would be north facing. All homes would have access to the two communal amenity areas at roof level and the communal courtyard. Bruce Grove Park provides further amenity space adjacent to the site.
- 6.105 Entrance cores would be located to minimise walking distances to the front doors of the proposed flats. There are less than eight homes per core in line with Standard 12 of the Housing SPG.
- 6.106 The applicant has also confirmed that all homes would be able to access full fibre broadband connectivity in accordance with the requirements of the site allocation and this would be secured by condition.

Daylight, Sunlight and Overshadowing

- 6.107 A *Daylight & Sunlight* report has been submitted with the application. In terms of daylight just two (1%) of 193 windows tested would fail to comply with the BRE guidelines for average daylight factor. This is a very good level of daylight provision.
- 6.108 The orientation of the proposed development on a north-south axis means that there would be many windows that fall below the required sunlight levels. The BRE guidance accepts that such windows may be discounted from analysis as they fall within ninety degrees of due south, which means that sunlight is only available in these areas for a short period as the sun rises or sets. Excluding rooms with windows affected in this way, only seven rooms within the development fall below the BRE standards for annual probably sunlight hours. This is just 3% of the 193 rooms analysed, which represents a good level of sunlight provision.

Outlook and Privacy

- 6.109 Most homes would have unrestricted outlook across Church Lane, The Roundway or the proposed internal courtyard. The layout of the development means that there no direct overlooking between habitable room windows of the new homes.

Air Quality and Noise

- 6.110 The development would be located close to the A10 which heads west then north from Bruce Grove via Lordship Lane and The Roundway. The submitted *Air Quality Assessment* (AQA) has not directly monitored the air quality levels associated with The Roundway, and instead it has used existing modelling data from 639 High Road.

Although this is also a busy road location it is possible that air quality data between these two sites could differ, given the greater prominence in the strategic road network of the A10. The Council's Pollution Officer has commented on this point and recommends that a further air quality assessment is required to ensure that the mitigation measures proposed are sufficient. Further air quality analysis and mitigation measures is required and can be secured by condition.

- 6.111 Notwithstanding this point, the AQA acknowledges that the air quality objectives for all homes would be met according to current predictions for the year 2027. The AQA also points out that these predictions are considered worst-case scenarios as future air pollution levels are very likely reduce further beyond those predicted levels due to the rapidly increasing adoption of electric vehicles allied to many other local, regional and national Government initiatives that aim to promote walking, cycling and reduced use of petrol and diesel vehicles.
- 6.112 Policy D13 of the London Plan places the responsibility for mitigating impacts from existing noise and nuisance generating activities onto the proposed new noise-sensitive development. The development would be located adjacent to the Shell petrol station. The pumps at the petrol station are likely to emit some benzene fumes. The *Local Air Quality Management Technical Guidance document (Defra, 2021)* states that there is no concern regarding residential exposure to benzene if homes are more than 10 metres of the petrol pumps. All proposed dwellings would be at least 13 metres from the existing pumps and in most cases this separation distance is much greater. Furthermore, it is considered that the risk of fire or explosion from petrol stations is low given that these facilities are governed by strict regulations to prevent such occurrences.
- 6.113 Noise impact on the proposed development from The Roundway and Lordship Lane would be mitigated by the provision of high insulation glazing. Mechanical ventilation equipment would be provided to these homes to ensure they don't overheat. The Spurz Autos garage and petrol station could create some adverse noise conditions, which would be mitigated through the same measures. There is a car wash located on the petrol station site close to the eastern boundary of the application site, which would be separated from the new homes by a boundary wall. Block D has been designed with its main amenity areas and habitable rooms on the western side of the development to minimise the impact on the living conditions of residents within that building.
- 6.114 Noise levels on balconies fronting The Roundway and Lordship Lane, and overlooking the car wash, would be high. Affected flats would be able to access multiple alternative amenity spaces both within the development (at roof level or in the central courtyard) as well as in the adjacent Bruce Castle Park.
- 6.115 Therefore, given that future air quality levels in the area would be suitable and given anticipated future additional improvements in air quality it is considered that the air quality for the homes within the development would be acceptable, subject to a condition that secures further air quality analysis and mitigation measures if required. It is also considered that the development would be acceptable in terms of its noise mitigation measures.

Children's Play Space

- 6.116 Policy S4 of the London Plan seeks to ensure that all children and young people have safe access to good quality play and informal recreation space, which is not segregated by tenure. At least 10 sqm per child should be provided to all qualifying developments. The Mayor's Child Play Space calculator estimates a total of 267sqm of play space would be required for this development.
- 6.117 Multi-generational play spaces totalling 294sqm would be provided within two roof garden areas, which exceeds the requirements described above. Details of the play space layout and equipment would be secured by condition.



Access and Security

- 6.118 NPPF paragraph 97 states that planning decisions should promote public safety and should take into account wider security requirements.
- 6.119 London Plan Policy D7 requires that 10% of new housing is wheelchair accessible and that the remaining 90% is easily adaptable for residents who are wheelchair users. Policy DM2 of the DM DPD requires new developments to be designed so that they can be used safely, easily and with dignity by all.
- 6.120 10% of the proposed homes would be wheelchair adaptable in accordance with Building Regulations requirement M4(3) and this would be secured by condition. All other dwellings would meet the accessible and adaptable homes requirements of M4(2).
- 6.121 An east-west pedestrian and cycle route would be provided through the centre of the development. Additional public realm including new pathways and planting would be provided around the development. All main residential entrances have been designed to be accessed directly from pedestrian routes. The new route through must be closed at night for security reasons and details of how this would be controlled would be secured by condition. Lighting would be provided around the development and details of this would be secured by condition.
- 6.122 The Designing Out Crime Officer of the Metropolitan Police has been consulted on this application and raises no objections subject to conditions.

- 6.123 As such, the overall residential quality of the proposed development is of a high quality and in accordance with the policies referenced above and is therefore considered to be acceptable.

Impact on neighbouring amenity

- 6.124 London Plan Policy D6 outlines that design must not be detrimental to the amenity of surrounding housing, and states that proposals should provide sufficient daylight and sunlight to surrounding housing that is appropriate for its context, while also minimising overshadowing. London Plan Policy D14 requires development proposals to reduce, manage and mitigate noise impacts.
- 6.125 Policy DM1 of the DM DPD states that development proposals must ensure a high standard of privacy and amenity for a development's users and neighbours. Specifically, proposals are required to provide appropriate sunlight, daylight and aspects to adjacent buildings and land, and to provide an appropriate amount of privacy to neighbouring properties to avoid material levels of overlooking and loss of privacy and detriment to amenity of neighbouring resident.
- 6.126 Policy SI1 of the London Plan states that development proposals should be air quality neutral. Policy DM23 states that developments should not have a detrimental impact on air quality, noise or light pollution.

Day and Sunlight, Outlook and Privacy

- 6.127 The proposed development would be located at least 25 metres from any neighbouring residential property. This substantial separation distance would ensure that no nearby residential properties would be significantly affected in terms of a loss of day/sunlight, outlook or privacy.
- 6.128 The application site is adjacent to a building currently in use as a nursery and the development has been designed with no balconies or windows facing towards the nursery or its rear amenity area.

Air Quality, Noise and Light Impact

- 6.129 The number of additional vehicle movements from the development would be low noting the high public transport accessibility of the site and given that no off-street parking would be available. As a predominantly residential development noise levels are also expected to be low. Ambient light levels from homes would not affect existing residents and lighting in general for the development would be controlled by condition. Construction disturbance from dust and noise would be adequately mitigated by condition.
- 6.130 As such, there would be no significant impact on neighbouring properties or the adjacent nursery.

Transport and parking

- 6.131 London Plan 2021 Policy T1 requires all development to make the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking and cycling routes, and to ensure that any impacts on London's

transport networks and supporting infrastructure are mitigated. Policies T4, T5 and T6 of the same document set out key principles for the assessment of development impacts on the highway network in terms of trip generation, parking demand and cycling provision.

- 6.132 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 and seeking to locate major trip generating developments in locations with good access to public transport. This is supported by DPD Policy DM31. Policy DM32 states that the Council will support proposals for new development with limited on-site parking where the site PTAL is at least 4, where a controlled parking zone exists, where public transport is available, where parking is provided for disabled people and where the development can be designated as 'car capped'.
- 6.133 The site has a maximum PTAL of 5 and is located within the Tottenham Event Day Controlled Parking Zone operating on event days only Monday-Friday 5pm to 8.30pm, plus Saturday, Sunday and Public Holidays midday to 8pm.
- 6.134 A Stage 1 Road Safety Audit was carried out to assess the proposed development's impact on the local highway and recommended changes were integrated into the design and layout of the scheme.

Assessment

Access

- 6.135 Pedestrian access to the development would be available from both the Roundway and Church Lane. An east-west route through the site is proposed, which would improve local permeability. The width of the passage at the eastern end is not specified on the plans and scales to less than 2 metres. There is scope within the design to improve the visibility and accessibility for users of this pathway by expanding the width of the eastern entrance either to the south, following future discussions with National Grid, or to the north through a reduced garden area for the flat immediately adjacent to the north. These options should be explored further and this can be secured through condition.

Servicing

- 6.136 Two loading bays of 12 metre length would service the development – one on The Roundway and one on Church Lane. Both bays could accommodate waste vehicle and large delivery vehicles. The bay on Church Lane requires 3 metres of clear space at either end to allow ease of access. The siting of these service bays is supported by the Council's Transportation Officer.

Vehicle Trip Generation

- 6.137 The site PTAL of 5 enables a low level of parking to be provided which would limit the impacts on proposed development on the highway network. The worst-case number of vehicle trips has been estimated from the proposed non-residential uses. The Council's Transportation Officer agrees that the development would result in a net reduction in vehicle trips on the local highway network.

Car Parking

- 6.138 The development would be car free as no parking is proposed on the development site. Four wheelchair-accessible parking spaces would be provided on-street instead of on the site. Whilst there is technically space available for wheelchair user parking on-site this has instead been provided as a communal landscaped garden which has visual and amenity benefits for the local area and the residents of the new development.
- 6.139 The number of wheelchair-accessible parking spaces meets the London Plan requirement for 3% accessible parking to be provided on commencement of the development. However, as these would be located off-site they cannot be allocated to the users of the proposed development. As such, although the provision of new wheelchair-accessible parking spaces in a convenient location (immediately outside the development on Church Lane) for wheelchair users of the development is a benefit of the proposal it cannot be considered policy-compliant in terms of meeting the requirements of Policy T6.1 of the London Plan as these spaces cannot be allocated to the specific users of the proposed wheelchair user homes and would instead be accessible by any 'Blue Badge' holder.
- 6.140 The proposed development would not qualify for a car-capped status in accordance with Policy DM32 of the Development Management DPD, which prevents occupiers of the development from being given on-street parking permits, as the CPZ within which the application site is located relates to 'event day' restrictions only. Parking is freely available to be used at all other times and as such any permit restrictions would be ineffective.
- 6.141 The Transport Assessment submitted with the application assumes that the development would be car capped which would entirely restrict parking in the local area. As this is not possible the parking demand from the development is therefore considered to have been underestimated. It is anticipated that 76 new homes would generate parking demand for up to 33 cars, which would need to be accommodated on local streets. The applicant has undertaken an on-street parking survey and the results presented show that there is ample space within local streets to accommodate the predicted overspill parking from this development without exceeding the 85% parking occupancy threshold.
- 6.142 To summarise, the on-street parking impact of the development would be acceptable despite no cap on residential parking levels. The provision of wheelchair-accessible parking on-street does not meet the requirements of Policy T6.1 of the London Plan as it would not be allocated to the wheelchair users of this development. However, given that wheelchair user parking would be located immediately adjacent to the site, given that the number of spaces provided (4) would exceed the minimum requirement for wheelchair-accessible parking spaces for this development (3) and given the wider visual amenity benefits in this heritage-sensitive location of providing a soft landscaped and tree-planted zone instead, it is considered on balance that the provision of off-site wheelchair parking is acceptable in this case.
- 6.143 Reductions on the anticipated on-street parking levels would be secured through sustainable transport methodologies including access to a car club and travel plans. These can be secured by condition.

Cycle Parking and Infrastructure

- 6.144 Cycle parking would be provided throughout the site in dedicated secure cycle stores. Additional 'short stay' publicly accessible cycle parking would be available within the public realm areas. The amount of cycle parking must include 5% cycle parking for larger cycles and this would be secured by condition. An additional condition would ensure that the cycle parking is in accordance with London Plan minimum cycle standards.
- 6.145 The lack of car capping for this development given the 'event day' nature of the local CPZ means that a significant increase in local on-street parking would be expected. Much of this is expected to be accommodated on Church Lane. The provision of four new parking spaces and a loading bay (in place of three parking spaces and two vehicle access points) on Church Lane would also further increase vehicle activity on that road and contribute to a reduction in space for cyclists to safely find refuge if required when vehicles are passing (southerly direction only as this street is one-way). Church Lane is part of Cycle Superhighway 1 and the cycle lane is contraflow in this area. As such, it is an important piece of Haringey's cycling infrastructure. The Council's Transportation Officer has objected to the development on the ground of a detrimental impact on cycle infrastructure.

Construction Works

- 6.146 No outline construction logistics plan has been submitted with the application. As such, a detailed construction logistics plan would be secured by condition.

Summary

- 6.147 The Council's Transportation Officer has assessed this application and has raised an objection regarding the potential reduction in highway safety that could occur from the increased on-street parking on Church Lane and also regarding the lack of on-site wheelchair-accessible parking. It is considered that, although the provision of wheelchair parking on-street is less ideal than on-site parking there are significant benefits both with regard to optimising development on the site and the visual appearance of the development in this case including the introduction of a verdant feature into the currently harsh street frontage and the creation of a more domestic character within this sensitive heritage environment that would outweigh the negative impacts in this case. As regards, the safety of the cycle route, it is noted that Transport for London were consulted on this matter and raised no objections. A Road Safety Audit was submitted with the application which identified that 3 metre refuge spaces would be available both north and south of the loading bay (and indeed within the loading bay when not in use) and between the northern most parking bay and those parking bays outside the nursery to the north of the site. As such, given that TfL have not objected and given that there would still be several refuge spaces retained on the highway, it is considered that the impact on the cycle infrastructure would not be significant enough in this case to constitute a reason for refusal on this ground, also noting the other significant benefits of the scheme.
- 6.148 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.

Urban greening and ecology

Policy Context

- 6.149 London Plan Policy G4 states that development proposals should not result in the loss of open space. Policy G5 requires major development proposals to contribute to the greening of London by including urban greening as a fundamental element of site and building design. Residential developments should meet a target urban greening factor of 0.4.
- 6.150 Policy SP13 of the Local Plan seeks to protect and improve open space and provide opportunities for biodiversity and nature conservation. Policy SP11 promotes high quality landscaping on and off-site.
- 6.151 DPD Policy DM1 requires proposals to demonstrate how landscape and planting are integrated into the development and expects development proposals to respond to trees on or close to a site. Policy DM21 requires proposals to maximise opportunities to enhance biodiversity on-site.

Urban Greening Factor

- 6.152 The existing site is mostly covered in hardstanding. The proposed development would include soft landscaping on site within a central courtyard and two roof level communal amenity areas including new tree planting, species rich planting and green roofs, which would significantly increase the ecology and biodiversity on site. New areas of planting would also be provided off-site, fronting The Roundway. The details of the landscaping provision can be secured by condition to secure a high-quality scheme with effective long-term management.



- 6.153 The landscape proposals described above have been designed to provide an urban greening factor of 0.4, which meets the policy requirements of London Plan Policy G5. Exact details of how this urban greening factor would be provided and maintained would be secured by condition.

Trees

- 6.154 The existing site includes two low quality trees which would be removed. 22 new trees would replace these which is a net increase of twenty on site. The four large London Plane trees adjacent to the site on The Roundway would be retained and fully protected during the construction process. The tree planting would be provided throughout the development including within the central courtyard and roof level amenity areas. There would be a landscaped garden fronting onto Church Lane which would include several trees.
- 6.155 The Council's Tree Officer agrees with the findings of the submitted *Arboricultural Impact Assessment Report* and raises no objections to the proposed development subject to conditions.

Ecology and Biodiversity

- 6.156 As the site is currently covered with buildings and hardstanding the proposed landscaping scheme would result in a biodiversity net gain of 86%. Brown and green roofs would be installed. Amenity planting would include both native and non-native planting to ensure nectar is provided for insects. The site holds negligible suitability for bat roosting and adjacent trees show no sign of bat roosting. Bird and bat boxes would be provided on the proposed development.
- 6.157 The Council's Nature Conservation Officer has confirmed that the ecological measures and proposed mitigation and enhancement measures are supported subject to conditions.
- 6.158 Therefore, it is considered that the proposed development is acceptable in terms of its landscaping and urban greening, its protection and additional planting of trees, and its ecology and biodiversity impact.

Carbon reduction and sustainability

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

Carbon Reduction

- 6.162 The applicant has submitted an Energy Strategy in support of this application. Photovoltaic panels would be provided on building roofs. The development would also be provided with air source heat pumps. Commercial units would achieve BREEAM 'very good' ratings.
- 6.163 The overall predicted reduction in carbon dioxide emissions for the proposed development shows a reduction of 60% from the 2013 Building Regulations baseline model. This represents an annual saving of approximately 48.8 tonnes of carbon per year. 31.99 tonnes a year must be offset through a financial contribution of £91,171.50 (plus a management fee) which can be secured through legal agreement.
- 6.164 Payment of this contribution can be partially deferred dependent on the applicant's further investigations as to whether the development can connect to the Council's future district heating network that is expected to be installed in proximity to the site in the future. This can be secured through legal agreement and condition as appropriate.

Overheating

- 6.165 London Plan Policy SI4 requires developments to minimise adverse impacts on the urban heat island, reduce the potential for overheating and reduce reliance on air conditioning systems. Through careful design, layout, orientation, materials and incorporation of green infrastructure, designs must reduce overheating in line with the Cooling Hierarchy.
- 6.166 Both commercial spaces pass overheating modelling requirements with windows closed and active cooling which is permitted here due to the close proximity to main roads. Future overheating of the development can be assessed further by condition, with mitigation measures secured as appropriate at that stage.

Summary

- 6.167 The proposal satisfies development plan policies and the Council's Climate Change Officer supports this application subject to the conditions and planning obligations. As such, the application is considered acceptable in terms of its carbon reduction and sustainability.

Flood risk and water management

- 6.168 London Plan Policy SI12 states that flood risk should be minimised and Policy SI13 states that development proposals should aim to achieve greenfield run-off rates with water managed as close to source as possible.
- 6.169 Local Plan Policy SP5 and Policy DM24 of the DM DPD seek to ensure that new development reduces the risk of flooding and provides suitable measures for drainage. The site is located within a ground water source protection zone and Flood Zone 1.
- 6.170 Both roof level (blue, green and brown roofs) and below ground water tank retention methodologies would be implemented. Surface water run-off would be at greenfield rates. Surface water attenuation would be provided on site to accommodate a one-in-100-year event with a 40% allowance for climate change. Surface water infiltration has been excluded to avoid impact to the nearby secondary groundwater aquifers.

- 6.171 The Council's Flood & Water Management Lead Officer has stated that the drainage proposals are acceptable subject to conditions. The Environment Agency have reviewed this application and have not objected from a flood risk and groundwater protection standpoint.
- 6.172 The new homes would incorporate water efficient fittings to limit water use to 105 litres per person per day. The commercial units will incorporate measures to improve water efficiency. This can be secured by condition.
- 6.173 The Moselle River runs in a culvert under Lordship Lane. The Environment Agency has confirmed that the distance of the culvert from the proposed development is significant enough to not require further investigation at this stage.
- 6.174 Thames Water has been consulted on this application and has raised no objections to this proposal, subject to conditions.
- 6.175 As such, the proposed development is considered acceptable in terms of its risk of flooding and water management arrangements.

Land contamination

- 6.176 Policy DM23 of the Development Management DPD requires proposals to demonstrate that any risks associated with land contamination can be adequately addressed to make the development safe.
- 6.177 A Desk Study Report has been submitted with the application. The report acknowledges that significant potential sources of contamination have been identified associated with the site's historical and potentially contaminative land uses. Risk in this regard would be mitigated through a range of measures including the use of physical barriers, cover systems, membranes and contaminant resistant water supply infrastructure. There is a moderate risk to groundwater given the nearby presence of a secondary groundwater aquifer.
- 6.178 The Council's Pollution Officer has reviewed the submitted documentation and raises no objections to the findings of the above referenced report. Conditions are recommended to secure an intrusive site investigation and risk assessments prior to the commencement of any development. Remediation of contamination shall occur in accordance with the recommendations of the investigations.
- 6.179 Therefore, the proposed development is considered acceptable in terms of its land contamination risks, subject to conditions.

Fire safety

- 6.180 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.
- 6.181 The *Fire Strategy Report* submitted with the application confirms that all residential units and ancillary areas, plus the commercial units, would be fitted with sprinkler systems. Each building would be fitted with a dry riser inlet. Fire service vehicles would be able to park within 18 metres of each residential block. All buildings would have

protected fire escape stairs. The Council's Building Control Officer has reviewed the submitted fire safety information and raised no objections.

- 6.182 As such, the proposed development is considered acceptable in respect of its fire safety provision, subject to further details being secured by condition.

Conclusion

- 6.183 The proposed development would meet the requirements of Site Allocation SA63 by providing a mixed-use residential and commercial development and an east-west pedestrian and cycle route on this vacant and derelict site.
- 6.184 The development would provide 76 new homes including 13 affordable homes (21% by habitable room), including nine three-bedroom homes (12%). This is the maximum reasonable of affordable housing and provides a satisfactory mix of unit sizes..
- 6.185 The development would include new Class E commercial floorspace fronting onto Roundway that would provide a significant uplift in the number and quality of jobs on site.
- 6.186 The development would be of a high-quality design that would substantially improve the appearance of the existing vacant and derelict site and would respect the visual quality of the local area. The development has general support from the Council's Quality Review Panel.
- 6.187 The public benefits that would arise from the provision of a significant number of new housing and affordable housing units, substantial improvements in the visual quality of this long-term derelict and vacant site and its associated public realm improvements, and the provision of improved local connectivity to and from Bruce Castle Park via the new east-west route are considered to outweigh the development's moderate level of less than substantial harm to the significance of local heritage assets..
- 6.188 The development would provide high-quality residential accommodation of an appropriate size, mix and layout within a well-landscaped environment, and would also provide new amenity and children's play spaces of an appropriate size and functionality.
- 6.189 The development would not have a material negative impact on the occupiers of nearby residential properties in respect of a loss of sunlight and daylight, outlook or privacy, nor in terms of excessive levels of noise, light or air pollution.
- 6.190 The development would include four on-street wheelchair-accessible car parking spaces and other sustainable transport initiatives would be secured including access to a car club and high-quality cycle parking.
- 6.191 The development would achieve an 60% reduction in carbon emissions through a range of measures to maximise its sustainability and minimise its carbon emissions. The development would achieve a suitable urban greening factor and would result in a net gain in biodiversity on the site.

6.192 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

7. COMMUNITY INFRASTRUCTURE LEVY

7.1.1 Based on the information given on the submitted CIL form the Mayoral CIL charge will be £435,014.52 (7,207sqm x £60.36) and the Haringey CIL charge will be £337,096 (6,741.92sqm x £50).

7.1.2 The CIL charge will be collected by Haringey from commencement of the development and could be subject to surcharges for failure to assume liability, for failure to submit a commencement notice and/or for late payment, and subject to indexation in line with the RICS CIL Index. Relief on the CIL payment relating to the affordable housing element of the scheme must be sought prior to the first commencement of the development.

7.1.3 An informative will be attached advising the applicant of the CIL charge.

8. RECOMMENDATION

GRANT PERMISSION subject to conditions in Appendix 1

Registered No. HGY/2022/0967

Applicant's drawing No.(s):

211_GA_01 to 04, 10 to 14; 2111_HL_01 to 04; 2111_SL_01 to 04; 2111_UGF_01; 2242-GHA-XX-XX-DR-A-(20)400 to 403; 2242-GHA-ZZ-00-DR-A-(05)100 Rev. P02, 01-DR-A-(05)101, 02-DR-A-(05)102, 03-DR-A-(05)103, 04-DR-A-(05)104, RL-DR-A-(05)105; 2242-GHA-ZZ-ZZ-DR-A-(05)001; 2242-GHA-ZZ-ZZ-DR-A-(05)002; 2242-GHA-ZZ-ZZ-DR-A-(05)010; 2242-GHA-ZZ-ZZ-DR-A-(05)011; 2242-GHA-ZZ-ZZ-DR-A-(05)200 Rev. P01; 2242-GHA-ZZ-ZZ-DR-A-(05)201 Rev. P01; 2242-GHA-ZZ-ZZ-DR-A-(05)300; 2242-GHA-ZZ-ZZ-DR-A-(05)301; 2242-GHA-ZZ-ZZ-DR-A-(05)310 Rev. P01; and 2242-GHA-ZZ-ZZ-DR-A-(05)311 Rev. P01.

Supporting documents also approved:

Affordable Housing Officer letter dated 28th March 2022, Statement of Community Involvement, Planning Statement, Construction Phase Environmental, Health and Safety Management Plan, Noise Impact Assessment, Air Quality Assessment, Design & Access Statement (by Glenn Howells Architects), Desk Study Report, Day & Sunlight Report, Flood Risk Assessment and Drainage Statement Rev. A, Preliminary BREEAM Report, Energy Strategy V2.0, Overheating Assessment, Fire Strategy Report, Fire Statement Form, Archaeological Desk Based Assessment, Built Heritage and Townscape Visual Impact Assessment, Transport Assessment, Arboricultural Impact Assessment Report, Ecological Impact Assessment, Biodiversity Net Gain Report, Design & Access Statement (by Campbell Codey), Financial Viability Assessment Report, Stage 1 Road Safety Audit.