

REPORT FOR CONSIDERATION AT PLANNING SUB-COMMITTEE

1. APPLICATION DETAILS

Reference Nos: HGY/2022/0823 & 2816

Ward: West Green

Address: Broadwater Farm Estate N17 and Tangmere, Willan Road, N17 6NA

Proposal – Planning Permission: Demolition of the existing buildings and structures and erection of new mixed-use buildings including residential (Use Class C3), commercial, business and service (Class E) and local community and learning (Class F) floorspace; energy centre (sui generis); together with landscaped public realm and amenity spaces; public realm and highways works; car-parking; cycle parking; refuse and recycling facilities; and other associated works. Site comprising: Tangmere and Northolt Blocks (including Stapleford North Wing): Energy Centre; Medical Centre: Enterprise Centre: and former Moselle school site, at Broadwater Farm Estate.

Proposal – Listed Building Consent: Listed building consent for the removal of Grade II listed mosaic mural to facilitate its re-erection in a new location.

Applicant: London Borough of Haringey

Ownership: Council

Officer contact: Christopher Smith

Date received – Application for Planning Permission: 22/03/2022

Date received – Application for Listed Building Consent: 27/10/2022

1.1 The applications are being reported to the Planning Sub-Committee for determination as the Planning Application is a major application where the Council is the applicant, and it is considered appropriate to determine the associated Listed Building Consent application at the same time.

1.2 SUMMARY OF KEY REASONS FOR RECOMMENDATION

- The development would deliver much-needed new homes for Council rent, including a large proportion of family homes, and would replace buildings where demolition is urgently required for safety reasons.
- The development would provide a 'right to return' for existing residents and a 'fair deal' for leaseholders and follows the aims and objectives of the Mayor of London's Good Practice Guide to Estate Regeneration.
- The development would deliver on the aspirations of Site Allocation SA61 by providing improvements to the quality of homes within the Broadwater Farm Estate, and by providing improvements to the overall design and pedestrian/cycle connectivity within and through the Estate. The provision of an Urban Design

Framework ensures that the development would meet the masterplanning requirements of SA61.

- The development would re-provide existing non-residential uses, including new retail facilities to support the existing and new residential community, and would provide new local employment opportunities.
- The development would be of a high-quality design which responds appropriately to the local context, and which has been designed through consultation with the local community. The development is supported by the Council's Quality Review Panel.
- The proposed removal, refurbishment and re-erection of the Grade II listed mural on Tangmere would result in heritage benefits from the development resulting from the restoration of the mural and its relocation to a more visually prominent location.
- The development would provide high-quality residential accommodation of an appropriate size and mix within an enhanced public realm environment including new streets and a new park in the heart of the estate. The increased public activity and natural surveillance would significantly improve safety and security on the estate.
- The development has been designed to avoid any material adverse impacts on the amenity of nearby residential occupiers in terms of loss of sunlight and daylight, outlook or privacy, excessive noise, light or air pollution. There would also be no negative impact on the local wind microclimate.
- The development would provide 91 car parking spaces within the site and additional parking spaces would be available within the wider estate, this is sufficient to support the parking requirements of residents within the new homes.
- The proposal includes car parking for occupiers of the proposed 10% wheelchair accessible dwellings and high-quality cycle parking.
- The development has been designed to achieve a significant reduction in carbon emissions, would improve the sustainability of the wider estate and would incorporate a replacement energy centre for the estate which could in turn connect to a district heating network in the future. The development would achieve a suitable urban greening factor and substantial improvements in biodiversity whilst also protecting and enhancing local ecology.

2. RECOMMENDATIONS

Planning Permission – HGY/2022/0823

- 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 and Sustainability is authorised to issue the planning permission and impose conditions and informatives subject to the agreement of planning obligations set out in the heads of terms below.
- 2.2 That delegated authority be granted to the Head of Development Management or the Assistant Director Planning, Building Standards and Sustainability to make any

alterations, additions or deletions to the recommended heads of terms and/or recommended conditions (planning permission) as set out in this report and to further delegate this power provided this authority shall be exercised in consultation with the Chair (or in their absence the Vice-Chair) of the Sub-Committee.

- 2.3 That the agreement referred to in resolution (2.1) above is to be completed no later than 23rd December 2022 within such extended time as the Head of Development Management or the Assistant Director Planning, Building Standards and Sustainability shall in her/his sole discretion allow; and
- 2.4 That, following completion of the agreement(s) referred to in resolution (2.1) within the time period provided for in resolution (2.3) above, planning permission be granted in accordance with the Planning Application subject to the attachment of the conditions.

Listed Building Consent – HGY/2022/2816

- 2.5 That the Committee resolve to GRANT listed building consent and that the Head of Development Management or the Assistant Director of Planning, Building Standards and Sustainability is authorised to issue the listed building consent and impose conditions and informatives.
- 2.6 That delegated authority be granted to the Head of Development Management or the Assistant Director Planning, Building Standards and Sustainability to make any alterations, additions or deletions to the recommended conditions (listed building consent) 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.

Summary of Conditions and Planning Obligations

Planning Permission – HGY/2022/0823

Conditions

- 1) Three years to commence works
- 2) Drawing numbers
- 3) Use class restrictions
- 4) Permitted development restrictions
- 5) Finishing materials
- 6) Wheelchair user dwellings
- 7) Aerial restrictions
- 8) Secured by design residential
- 9) Secured by design commercial
- 10) External lighting
- 11) Ecological appraisal
- 12) Landscaping
- 13) Plant noise limitations
- 14) Cycle parking
- 15) Delivery and servicing
- 16) Council rented homes
- 17) Highway works
- 18) Electric vehicle charging
- 19) Architect retention

- 20) Contamination remediation
- 21) Unexpected contamination
- 22) Considerate constructor scheme
- 23) Construction environmental management plan
- 24) Surface water drainage scheme
- 25) Drainage management and maintenance plan
- 26) Construction phase fire strategy
- 27) Occupation phase fire strategy statement
- 28) Evacuation lifts details
- 29) Updated air quality assessment
- 30) Road safety audits
- 31) Car parking management strategy
- 32) Piling method statement
- 33) Water network upgrades
- 34) Play space details
- 35) Balcony screens
- 36) Digital connectivity infrastructure
- 37) Arboricultural method statement
- 38) Highway condition survey
- 39) Courtyard access controls
- 40) Moselle culvert maintenance and improvements
- 41) Moselle culvert survey
- 42) Boundary treatments and access controls
- 43) Energy statement
- 44) Energy assessment
- 45) Energy centre details
- 46) District energy network
- 47) Energy monitoring
- 48) Residential overheating report
- 49) Non-residential overheating report
- 50) Building user guide
- 51) BREEAM new construction
- 52) Living roofs
- 53) Circular economy monitoring
- 54) Whole life carbon assessment
- 55) Ecological enhancement measures
- 56) Pre-demolition audit
- 57) Climate change mitigation measures

Informatives

- 1) Proactive statement
- 2) CIL
- 3) Signage
- 4) Naming and numbering
- 5) Asbestos survey
- 6) Water pressure
- 7) Designing out crime
- 8) Environmental permits
- 9) Groundwater protection

- 2.7 Planning obligations are usually secured through a S106 legal agreement. In this instance the Council is the landowner of the site and is also the local planning authority and so cannot legally provide enforceable planning obligations to itself.
- 2.8 Several obligations which would ordinarily be secured through a S106 legal agreement will instead be imposed as conditions on the planning permission for the proposed development.
- 2.9 It is recognised that the Council cannot commence to enforce against itself in respect of breaches of planning conditions and so prior to issuing any planning permission measures will be agreed between the Council's Housing service and the Planning service, including the resolution of non-compliances with planning conditions by the Chief Executive and the reporting of breaches to portfolio holders, to ensure compliance with any conditions imposed on the planning permission for the proposed development.
- 2.10 The Council cannot impose conditions on planning permissions requiring the payment of monies and so the Director of Placemaking and Housing has confirmed in writing that the payment of contributions for the matters set out below will be made to the relevant departments before the proposed development is implemented.
- 2.11 Summary of the planning obligations for the development is provided below:
- Affordable housing – provision of all new homes at Council rents
 - Affordable workspace
 - Parking permit restrictions
 - CPZ re-instatement, review and expansion contribution (£30,000)
 - Amendments to traffic management order (£5,000)
 - Residential and commercial travel plans
 - Travel plan monitoring (£10,000)
 - Highway works agreement (in consultation with TfL)
 - Stopping up works agreement
 - Walking and cycling improvements contributions (£100,000)
 - Accident reduction strategy for local road junctions (£150,000)
 - Future connection to district heating network
 - Carbon offsetting contribution if no connection to energy network
 - Management and maintenance of public realm
 - Delivery of social value measures secured through procurement process
 - Obligations monitoring contribution

Listed Building Consent – HGY/2022/2816

Conditions

- 1) Three years to commence works
- 2) Drawing numbers
- 3) Notification of each phase of work
- 4) Information prior to detachment of mural
- 5) Information prior to storage of mural
- 6) Information prior to restoration works
- 7) Information prior to completion of restoration

- 8) Information prior to re-erection of mural
- 9) Inspection, maintenance plan and photographic record

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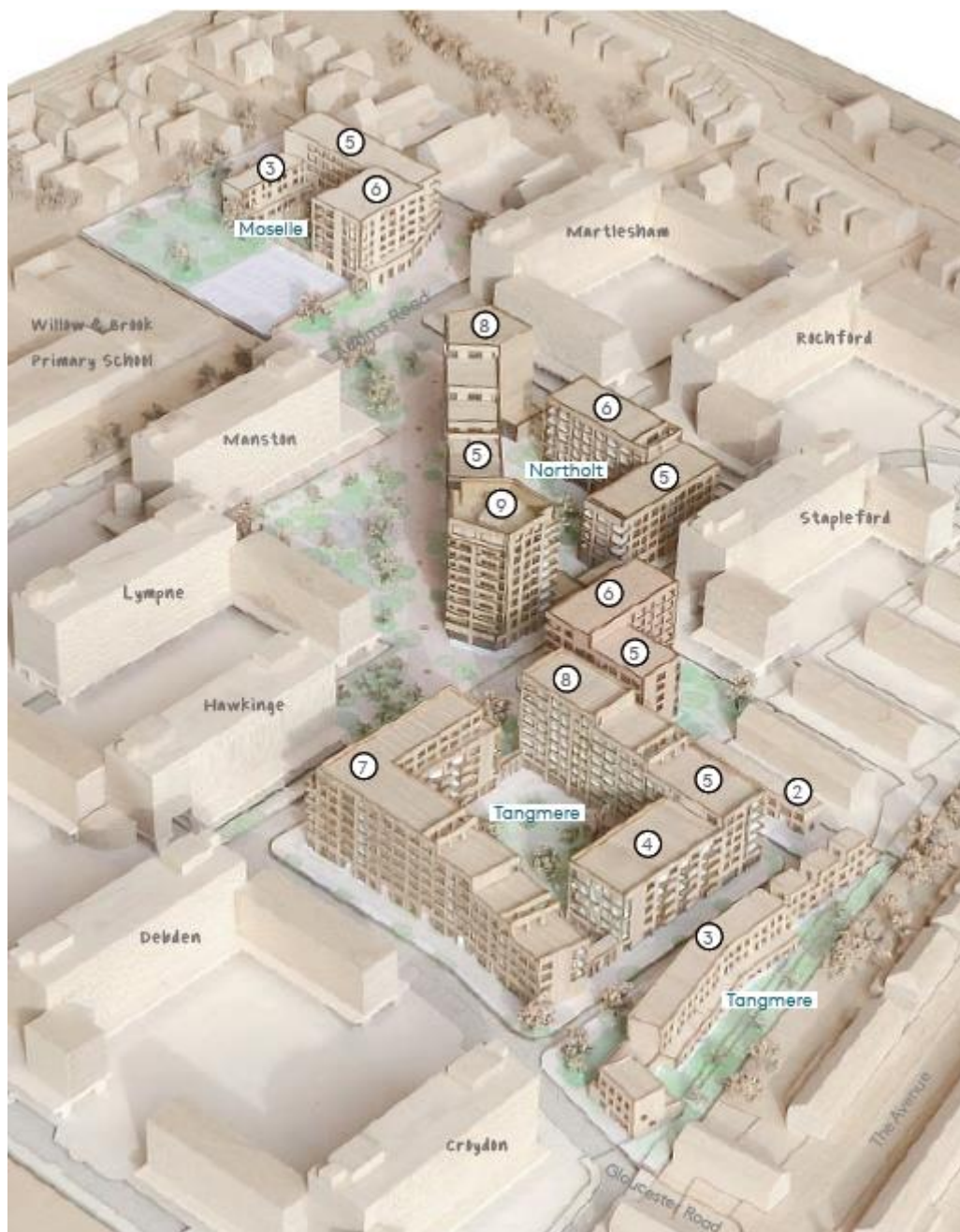
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3. PROPOSED DEVELOPMENT AND SITE LOCATION DETAILS

Proposed development

3.1 This is an application for the demolition of the existing Tangmere, Northolt, Stapleford North, enterprise centre, medical centre and energy centre buildings and erection of 294 new homes (Use Class C3) for Council Rent in a mix of houses and flats within buildings ranging from two to nine storeys in height. 1,282sqm of non-residential uses would also be provided in the form of a wellbeing hub, a replacement enterprise centre and a retail unit.



3.2 The development would be provided in three distinct parts. The existing seven storey Tangmere building and medical centre would be replaced with a new building of a maximum eight storeys in height and an adjacent building of a maximum six storeys in height. It would include 127 new homes, with the larger building set around a

landscaped internal courtyard. The new wellbeing hub and enterprise space would be provided at ground floor level. A further 17 homes would be provided in the form of new terraced houses to the south and east of the new Tangmere building.

- 3.3 The Grade II listed mural on Tangmere would be carefully removed, restored and relocated within the Estate.
- 3.4 The existing nineteen storey Northolt building and the five storey Stapleford North building would be replaced with a building that would be a maximum nine storeys in height and would include 100 new homes and enterprise space set around a triangular courtyard. It would be located adjacent to a new publicly accessible open space. The new building on the site of the former Moselle School (max. two storeys in height) would be a maximum six storeys in height and would include 40 new homes and a retail unit at ground floor.
- 3.5 The overall development would include 84 one-bedroom homes, 106 two-bedroom homes, 60 three-bedroom homes and 44 homes of four or more bedrooms. 30 homes (10%) would be wheelchair accessible. The homes would meet all relevant internal and amenity space standards.
- 3.6 91 car parking spaces would replace the existing 225 car parking spaces and 560 cycle parking spaces would also be provided. The development would be low carbon and would be supported by a replacement communal heating system and is expected to connect to the borough-wide district energy network when this becomes available.
- 3.7 The development has been designed in a contemporary manner that respects the character of the existing estate and would use a palette of robust finishing materials including brick walls with concrete detailing, with coloured windows, doors and metalwork.
- 3.8 The development would provide many public realm improvements to the estate including removal of the existing undercroft parking areas, safer and more pedestrian friendly street layouts, new street planting, and new public squares and courtyards.
- 3.9 The application is supported by an Urban Design Framework that describes how the development proposal would fit within a long-term vision for the wider estate including details of potential future public realm improvements, block refurbishments and other projects that would ensure the estate is developed in future in accordance with a clear strategy that is supported by residents.

Site and Surroundings

Site Context

- 3.10 The application site is an irregular shaped plot within the central part of the Broadwater Farm Estate that includes the Tangmere, Northolt, Stapleford North, the enterprise centre, medical centre and energy centre buildings and their surrounding public realm areas. The site also includes a currently vacant plot that formerly included the Moselle School which has been replaced by the Brook and Willow Schools to the west of this plot.
- 3.11 The existing Tangmere block is a ziggurat-style building of up to seven storeys that comprises 116 homes. The existing Northolt block is a nineteen-storey building, which

is connected to the five storey Stapleford North wing and the existing energy centre. These buildings contain 126 homes. The Broadwater Farm Community Health Centre is a single storey building located to the west of Tangmere block and is home to the Broadwater Farm Medical Practice and Connected Communities services. The Enterprise Centre is a series of nineteen single storey commercial units fronting onto Willan Road.

- 3.12 Within and surrounding the application site are several green courtyard spaces, paths, roads and other public realm areas. To the south of Tangmere block is the Memorial Gardens comprising a hardstanding area with tree planting and seating.
- 3.13 The Broadwater Farm Estate is a large residential estate consisting of twelve different blocks of varying heights up to 19 storeys and close to 1100 dwellings. It was first occupied in the 1970s. The buildings were originally connected via a series of walkways at first floor level. These walkways were dismantled in the 1990s. The ground floor level of the estate buildings is predominantly used for undercroft car parking.
- 3.14 The wider estate also includes a range of community facilities including a community centre, a primary school, a children's centre and a church.
- 3.15 The area surrounding the Estate is predominantly residential consisting of terraced and semi-detached housing. Lordship Recreation Ground is immediately to its west. Lordship Lane is a short walk to the north and the commercial area of Bruce Grove is further to the east.

Development Context

- 3.16 The Broadwater Farm Estate was constructed in the 1960s and early 1970s using the Large Panel System method, which has subsequently been found to have inherent structural defects in certain circumstances. In 2017, the Council commissioned comprehensive structural surveys to fully consider the condition of all blocks on the Estate. These surveys identified significant structural defects for the Tangmere and Northolt blocks, which failed tests relating to their ability to withstand the force of a vehicular strike to the building or from a bottled gas explosion, with a subsequent risk of progressive collapse. The option of carrying out extensive structural works to and refurbishment of these blocks was considered but was found to be prohibitively expensive and it was subsequently concluded that demolition was the only viable option. Following consultation with residents of the blocks, in November 2018 the Council resolved to demolish them. Both Tangmere and Northolt buildings have now been evacuated.
- 3.17 The Council has been working closely with residents on the estate to create and deliver a comprehensive and wide-reaching estate improvements programme which includes the potential delivery of replacement and new high-quality Council homes, comprehensive block refurbishments and substantial public realm improvements.

Planning Policy Designations

- 3.18 The Estate forms the southern part of Site Allocation SA61 within the Site Allocations DPD 2017 which is identified for improvements to its housing stock, overall design, and routes through the area.

- 3.19 The site is partially designated as part of the Blue Ribbon Network (the culverted Moselle Brook runs underneath the estate). The western side of the estate is a Flood Zone 2 and the northern part of it is located within a Critical Drainage Area. The adjacent Recreation Ground is Metropolitan Open Land and a Site of Importance for Nature Conservation (Local). The Estate has a low PTAL rating of 1b-2, although the W4 bus route does run directly through the site.
- 3.20 The Estate is not located within a conservation area. It does not contain any locally listed buildings. The Mural on Tangmere block is Grade II listed. There are no other listed buildings on site Estate. The Tower Gardens Conservation Area is 190 metres to the north of the site. The Peabody Cottages Conservation Area is also a short walk to the north of the site. The Bruce Castle and Bruce Grove Conservation Areas are nearby to the north-east and east respectively.
- 3.21 There are several listed and locally listed buildings within the Bruce Castle and Bruce Grove Conservation Areas, including the Grade I listed Bruce Castle.

Relevant Planning and Enforcement history

- 3.22 The buildings within the application site and the wider Estate have an extensive planning history. The planning applications relevant to the buildings within or adjacent to the site that have been submitted in recent years (since 2005) are described below:

Application Site

- 3.23 HGY/2022/0647. Request for an Environmental Impact Assessment (EIA) Screening Opinion in relation to proposals for the redevelopment of land within the above Estate in accordance with Regulation 6 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, as amended. EIA not required 30th September 2022.

Tangmere building only

- 3.24 HGY/2021/0742. Prior notification for demolition of the existing 6-storey residential block (Tangmere). Prior approval not required 1st April 2022.

Northolt building only

- 3.25 HGY/2019/2162. Replacement of the existing ventilation louvres on the west elevation of the building with larger acoustic louvres and the addition of a new double door in the south elevation. Permission granted 5th December 2019.

Moselle School

- 3.26 HGY/2021/1835. Prior notification: Demolition. Permission granted 23rd July 2021.

Wider Estate

- 3.27 HGY/2019/3067. Erection of a free standing brick built electrical substation. Permission granted 15th October 2020.

- 3.28 HGY/2018/2708. Certificate of lawfulness for the installation of new external pipework encased in a weatherproof duct to exterior of each of the blocks. Permission granted 15th October 2018.
- 3.29 HGY/2009/2123. Demolition of Broadwater Farm Primary School and William C Harvey Special School, and redevelopment of the site to provide a purpose-built two storey inclusive learning centre (520 places, primary age) to incorporate Broadwater Farm Primary, William C Harvey and Moselle School Special Schools with associated car parking, external landscaping and new pedestrian and vehicle access from Adams Road. Permission granted 16th March 2010.

4. CONSULTATION RESPONSE

4.1 Quality Review Panel

4.2 The scheme has been presented to Haringey's Quality Review Panel on three occasions. The Panel's written responses are attached in Appendix 6.

4.3 Planning Committee Pre-Application Briefing

4.4 The proposal was presented to the Planning Sub-Committee at a Pre-Application Briefing on 17th March 2022. The minutes are attached in Appendix 8.

4.5 Development Management Forum

4.6 A virtual meeting was held on 16th March 2022. The main topics raised were around loss of housing and health services on the Estate. Details and summaries of the comments made and how they were addressed are available in Appendix 7.

4.7 Planning Application Consultation

4.8 The following were consulted regarding the application:

Internal

- 1) LBH Design: No objections.
- 2) LBH Conservation: No objections to the planning application. Supports the listed building consent application.
- 3) LBH Housing: No objections.
- 4) LBH Transportation: No objections, subject to conditions.
- 5) LBH Carbon Management: No objections, subject to conditions.
- 6) LBH Regeneration: No objections.
- 7) LBH Nature Conservation: No objections, subject to conditions.
- 8) LBH Tree Officer: No objections, subject to conditions.
- 9) LBH Flood and Water Management: No objections, subject to conditions.

- 10)LBH Community Safety: No objections.
- 11)LBH Waste Management: No objections.
- 12)LBH Pollution: No objections, subject to conditions.
- 13)LBH Parks: No comments to make.
- 14)LBH Policy: No objections.
- 15)LBH Street Lighting: No comments to make.
- 16)LBH Noise: No objections subject to conditions.
- 17)LBH Public Health: No objections.

External

- 18)Greater London Authority (GLA): Stage 1 comments can be viewed in full in Appendix 4. The GLA's summary comments are provided below.

London Plan policies on housing, affordable housing, urban design, heritage, inclusive design, sustainable development, green infrastructure, and transport are relevant to this application. Whilst the proposal is supported in principle, the application does not currently fully comply with some of these policies, as summarised below

- *Land Use Principles:* The redevelopment of part of the estate for residential, community and employment floor space along with public realm improvements is supported. Overall, and subject to Council securing floorspace and suitable rent levels, the estate renewal meets with the requirements of the London Plan and the GPGER [Good Practice Guide to Estate Regeneration].
- *Housing:* The proposal will increase the quantum of housing within the estate, all of which (100%) will be social rent affordable units which is strongly supported. The unit mix provides a good range of housing type and sizes, however the Council should confirm that it meets housing need.
- *Urban Design and Heritage:* The scheme raises no strategic concerns with regards to layout, scale, appearance and accessibility and the new improved public realm with substantial playspace is welcome. The scheme will not harm any nearby heritage assets. The fire strategy must meet with the London Plan requirements and be secured.
- *Transport:* The number of car parking spaces on site should be reduced. A station and line impact analysis on the Underground system is required. Discussions between the Council and TfL are required regarding a contribution towards the Healthy Streets proposals. Further details of long stay cycle parking, travel plan and details affecting the safeguarding of the W4 bus route are required. Management Plans, details of blue badge and EVCP provision should be secured.

- *Sustainability and Environment*: The scheme will meet with urban greening and biodiversity requirements. Further information on energy, WLC [Whole Life Cycle carbon] and circular economy is required, and mitigation measures on flood risk and air quality should be secured by condition.

19)Transport for London: No objections, subject to conditions and obligations.

20)Health & Safety Executive: Raised some concerns.

21)Canal and River Trust: No comments to make.

22)Thames 21: No comments made.

23)Environment Agency: No objections, subject to conditions and informatives.

24)Natural England: No objections.

25)Thames Water: No objections, subject to conditions and informatives.

26)Greater London Archaeological Advisory Service: No archaeological requirements or objections.

27)Metropolitan Police Designing Out Crime Officer: No objections, subject to conditions.

28)Historic England: Supports the listing building consent proposals. No comments made on the planning application.

Local Interest Groups

29)Broadwater Farm Residents Association: Object to the application (comments are summarised below and responded to in the main body of the report).

30)Friends of Lordship Rec: No comments received.

31)Bruce Grove Residents Network: No comments received.

5. LOCAL REPRESENTATIONS

5.1 The planning 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 1,390 individual letters sent to surrounding local properties. The listed building consent application has been publicised by way of a site notice. 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 (for both applications)
- Objecting: 1
- Commenting: 2
- Supporting: 2

- 5.2 The following local groups/societies (other than those consulted above) also made representations: None.
- 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:
- Development is not financially viable
 - Loss of health centre
 - Insufficient family-sized housing
 - Excessive loss of day/sunlight
 - Inadequate parking provision
 - Inappropriate internal kitchen layouts
- 5.4 The following issues raised are not material planning considerations:
- Individual request for a home within the new development (officer note: this is not a matter for the Local Planning Authority to consider and should be directed to the Council's Housing section).

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 affordable housing mix
 3. Design and appearance
 4. Heritage impact (including listed building consent matters)
 5. Residential quality
 6. Neighbouring amenity
 7. Parking and transport
 8. Open space, trees and urban greening
 9. Carbon reduction and sustainability
 10. Waterways and flood risk
 11. Land contamination
 12. Fire safety
 13. Equalities

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 sites, including through the redevelopment of surplus public sector sites.
- 6.6 London Plan Policy H4 requires the provision of more genuinely affordable housing. In Policy H5 the Mayor of London expects that residential proposals on public land should deliver at least 50% affordable housing on each site.
- 6.7 London Plan Policies H7 and H8 make clear that loss of existing housing should be replaced by new housing at existing or higher densities with at least the equivalent level of overall floorspace.
- 6.8 London Plan Policy H8 sets out detailed policy requirements for estate renewal schemes and is supported by the Mayor of London's Good Practice Guide to Estate Regeneration (GPGER). Together, this policy and the related guidance seek a consideration of alternative options before the demolition and replacement of affordable homes is sanctioned. The GPGER describes key principles of estate regeneration as being an increase in affordable housing, full rights to return for social tenants and a fair deal for leaseholders and freeholders. The guidance also requires a ballot of residents where the demolition of existing buildings occurs and extensive consultation of residents through the regeneration process.
- 6.9 London Plan Policy S1 seeks to ensure that social infrastructure needs of London's diverse communities are met and Policy S2 states that proposals should support new and enhanced health and social care facilities. London Plan Policy E2 seeks to resist the loss of business space and support re-provision and Policy E9 states that new retail facilities should be provided within town centres in the first instance.
- 6.10 London Plan Policy D3 seeks to optimise the potential of sites through a design-led approach. Policy D6 emphasises the need for good housing quality which meets relevant standards of accommodation.

Local Policy

- 6.11 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.
- 6.12 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. Local Plan Policy SP2 also makes clear that the Council will bring forward a programme of renewal of Haringey's housing estates, with Broadwater Farm being identified as one of nine estates being in most need.

- 6.13 Local Plan Policies SP8 and SP9 seek to resist the loss of business space and support re-provision. SP14 states that new or improved health facilities will be supported. Local Plan Policy SP16 sets out Haringey's approach to ensuring a wide range of services and facilities to meet community needs are provided in the borough.
- 6.14 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, whilst also ensuring that any affordable housing that is lost is replaced with at least equivalent amounts of new affordable residential floorspace. Policy DM11 goes further to state that proposals for estate renewal will be required to re-provide the existing affordable housing on an equivalent habitable room basis, tailored to better meet housing needs and to better achieve more inclusive and mixed communities. Policy DM13 makes clear that the Council will seek to maximise affordable housing delivery on all sites.
- 6.15 Policy DM55 identifies Broadwater Farm as an Estate Renewal site that should be supported by a masterplan developed through co-ordinated and community-based consultations.
- 6.16 Policy DM40 seeks to facilitate the renewal and regeneration of existing non-designated employment land and floorspace. 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. Local Plan Policy DM49 seeks to protect existing social and community facilities unless a replacement facility is provided which meets the needs of the community.

Site Allocation

- 6.17 The application site forms part of Site Allocation SA61 in the Site Allocations DPD 2017 and is identified as being suitable for development that provides improvements to its housing stock, improved routes through and an improved overall design.
- 6.18 SA61 has the following Site Requirements and Development Guidelines:

Site Requirements

- Development will be required to be in accordance with a masterplan, prepared with the involvement of residents and the Canal and River Trust.
- The SPD will be prepared in consultation with existing residents and will assess existing issues within the area and options to address these have regard to the following:
 - the form, function and quality of existing buildings on site
 - the potential for refurbishment
 - the principles under which demolitions would be considered
 - the different and distinct characteristics of areas within and adjacent to the Allocation area, including (but not limited to) Lido Square, Moira Place, and Somerset Close
 - the management and maintenance arrangements

- the community groups active on the site and their aspirations and needs
 - opportunities to further improve the urban realm across the site.
- Where new development is proposed:
 - the optimum quantum of development to be provided
 - the requirement to replace affordable residential floorspace in accordance with Policy SP2
 - the housing mix in accordance with Policy DM11 and Council's Housing Strategy
 - the achievement of a high-quality development that integrates with its surroundings
 - housing decant considerations
 - the capacity of the existing community facilities to match any development, including existing shortfalls where they exist
 - the need to improve the transport accessibility of the site to serve the new development and the existing community, including public transport, cycling and walking, and alterations to the surrounding road network
 - consideration of feasibility and viability constraints; and
 - the delivery/implementation plan, including phasing strategy if necessary.
 - Have regard to the opportunity to deliver the objectives of the Thames River Basin Plan, in accordance with Regulation 17 of the Water Environment Regulations 2013.

Development Guidelines

- There may be opportunities to link the open spaces in the area, particularly Lordship Recreation Ground, to benefit wider areas of the Borough through the Green Grid network.
- This site is identified as being in an area with potential for being part of a decentralised energy network. Proposals should reference the Council's latest decentralised energy masterplan regarding how to connect, and the site's potential role in delivering a network within the local area.
- Studies should be undertaken to understand what potential contamination there is on this site prior to any development taking place.

Housing Supply

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).

Development Principles – Demolition and Estate Renewal

- 6.19 As described above the Mayor of London's Good Practice Guide to Estate Regeneration (GPGER) guidance document for estate regeneration describes three key principles which should be met in order to achieve better homes for local people within estates. These are: an increase in affordable housing within the estate, full rights to return for social tenants and a fair deal for leaseholders.
- 6.20 The guidance also states that prior to pursuing demolition as an option, the Council should consider whether there are alternative options that would provide an increase in affordable housing without requiring the potential disruption associated with demolition. The option to demolish and rebuild an estate should be set against the wider social and environmental impacts to ascertain whether demolition and rebuild is the most optimum solution.
- 6.21 Furthermore, the guidance requires estate regeneration projects which involve the demolition of existing affordable homes to demonstrate that they have secured resident support for their proposals through a ballot.

Alternatives to Demolition of Existing Homes

- 6.22 The Broadwater Farm Estate was constructed using a Large Panel System methodology, which has subsequently been found to have inherent structural defects in certain circumstances. As set out above in 2017 the Council commissioned comprehensive structural surveys to fully consider the condition of all blocks on the Estate. These surveys identified serious structural defects in the construction of the Tangmere and Northolt blocks. The blocks failed tests relating to their ability to withstand the force of a vehicular strike to the building or a bottled gas explosion, with the subsequent risk of a potential progressive collapse. The alternative option of carrying out extensive structural works to and refurbishment of these blocks was looked into and considered. However, this non-demolition option was identified as being prohibitively expensive. It was subsequently concluded that demolition was the only viable option for the Tangmere and Northolt buildings.
- 6.23 Following extensive consultation with residents of the blocks and with the above structural analysis in mind the Council resolved to demolish Tangmere and Northolt blocks in November 2018. Since that time the Council has taken steps to rehouse all secure Council tenants and acquire the interests from the owners and occupiers of those properties in order to enable the required demolition and redevelopment to occur with minimal disruption to residents.
- 6.24 Whilst Stapleford North block does not have the same structural problems that necessitate its immediate demolition its siting immediately to the south of Northolt block and the energy centre and between Northolt and Tangmere blocks (and given the age of the building) means that the opportunity has been taken, following a statutory consultation exercise with residents, to include the demolition of this building in the proposals in order to optimise the overall development and maximise the public benefits from the development in terms of the provision of affordable housing and comprehensive improvements in the public realm.

Provision of Affordable Housing

- 6.25 The Mayor of London's GPGER guidance sets out that, in addition to ensuring no net loss of affordable homes, estate regeneration schemes must provide as much

additional affordable housing as possible. This matches the requirement in Policy DM11 of the Development Management DPD which requires proposals for comprehensive renewal of social housing estates to re-provide the existing affordable housing on an equivalent habitable room basis, tailored to better meet current housing needs and the achievement of more inclusive and mixed communities.

- 6.26 The proposals will deliver 294 new homes as 100% affordable housing for council rent (subject to future purchase of individual homes by returning leaseholders). This represents an uplift of 52 additional council rent homes within the estate, with a potential net gain of up to 95 council rent homes (subject to the final number of returning leaseholders). The number of affordable habitable rooms within the application site would significantly increase from 852 to 1,242 and the number of bedspaces would also rise significantly from 687 to 1,164. The affordable residential floor space would increase from 11,243sqm to 24,580 sqm. This highlights how the new homes are substantially larger and provide more bedrooms than the existing homes that are to be demolished. All homes would be of a high quality in construction and physical design as described in the sections below.
- 6.27 New homes in council rented tenure are the greatest affordable housing need identified in the Council's Housing Strategy 2017-22 and as such this development proposal makes a substantial contribution to the Council's affordable housing objectives in line with Policy SP2 of the Local Plan and Policies DM10, DM11 and DM13 of the Development Management DPD.
- 6.28 The wider area is an established residential area which includes a range of tenures, including dwellings that are owner-occupied and those available for private rent. The proposal would therefore contribute to the creation of a mixed and balanced community in the local area.
- 6.29 As such, given that the development is for 100% council rented homes and provides a significant uplift in the number of affordable homes, habitable rooms and bedspaces on site, there is no net loss of affordable homes (rather a substantial increase) and it is also considered that the affordable floor space within the development has been maximised. Furthermore, the requirements of Policy DM11 have also been met with regard to meeting housing need and providing more inclusive and mixed communities.

'Right to Return' and a 'Fair Deal' for Leaseholders

- 6.30 London Plan Policy H8 states that affordable housing that is replacing existing social rented accommodation must be provided at social rent levels that facilitates a right of return for existing social rent tenants. Mayor of London's GPGER guidance states that replacement social rented accommodation should offer a 'fair deal' to resident leaseholders and freeholders, in the form of providing the right to a new home within the new development.
- 6.31 As already confirmed in the above sections of this report, the existing council rented homes and equivalent floorspace would all be replaced as part of this proposed development. The Council has successfully re-housed all secure tenants from Tangmere and Northolt and Stapleford North. It has been confirmed that under the Broadwater Farm Rehousing and Payments Policy (agreed at Cabinet in November 2018) all secure tenants that have moved off the estate have a guaranteed 'Right to Return'. This means that where residents are decanted into temporary alternative living accommodation and their original home is demolished, they may return to a

newly built homes on the estate on similar terms to their previous tenancy, with rents capped at no more than 10% above the average for similar properties on the estate. Also, under this agreement returning leaseholders would have the option of purchasing their new home.

- 6.32 The new council homes would be prioritised for Broadwater Farm residents. Priority access to the new homes would be given firstly to former residents of Tangmere and Northolt, then to former Stapleford North residents. Any homes that remain available following the first phase of prioritisation to former residents would then be offered to eligible Broadwater Farm Estate secure tenants through the Neighbourhood Moves Scheme (which prioritises existing residents within 250 metres of a Council home being demolished) based on housing need, with priority given to those on the Estate who are currently either under-occupying their current home or living in over-crowded homes.

Full and Open Consultation

- 6.33 The applicant has undertaken a series of public consultations in the form of a wide-ranging public engagement programme with residents of the estate over more than 18 months ahead of submitting this planning application. Comments received during the public consultations have influenced the content and design of this development proposal. Further details of the public consultation approach are set out in the Statement of Community Involvement submitted with the application.
- 6.34 A ballot of eligible residents on the estate was undertaken from 11th February to 7th March 2022 on the question “Do you support the redevelopment proposals within the Broadwater Farm Estate as set out in the Landlord Offer?”. The result was announced on 8th March 2022: on a turnout of 55% of eligible voters. 85% supported the proposal. This planning application has been submitted following the result of that ballot.

Demolition and Estate Renewal – Summary

- 6.35 The application meets the requirements of London Plan Policy H8 and the Mayor of London’s Good Practice Guide to Estate Regeneration guidance document by only demolishing buildings where there is no reasonable alternative, by providing a net increase in affordable housing in Council Rent tenure, by maximising the affordable housing on site, by providing a full right to return for social tenants and a fair deal for leaseholders and freeholders, and by comprehensively consulting estate residents on the proposed development scheme. The development proposal is fully supported by eligible residents following a ballot, as described above.
- 6.36 It is also noted that the GLA’s Stage 1 comments are supportive of the development proposal’s estate renewal principles. As such, it is considered that the demolition and renewal of the Estate is acceptable.

Site Allocation and Masterplanning

- 6.37 The application site forms part of SA61 which is seeks improvements to the housing stock, routes through and overall design of the site allocation. The site requirements and development guidelines of the site allocation are described in full above.
- 6.38 SA61 requires that any development must be ‘in accordance with a masterplan, prepared with the involvement of residents’ and also requires that a supplementary

planning document (SPD) be submitted that includes comprehensive information in respect of form, function, quality, refurbishment and demolition potential, character analysis and urban realm improvements in the local area. SA61 also requires any development to be supported by further information that clarifies additional matters including the provision of optimised development, provision of high-quality development, and transport, viability and phasing considerations.

- 6.39 Policy DM55 of the Development Management DPD states that development that forms part of a site allocation must be accompanied by a masterplan for the wider site and beyond that demonstrates the proposal will not prejudice the future development of other parts of the site or adjoining land and will not prejudice the delivery of the site allocation and its wider area outcomes.

Urban Design Framework

- 6.40 This application is supported by an Urban Design Framework (UDF) in lieu of an SPD and masterplan. The UDF covers the Broadwater Farm Estate only as the remainder of SA61 to the north would not be directly affected by either this proposal, or any future development on the estate. The UDF has been developed in consultation with the local community through a series of public consultation events and design workshops.



- 6.41 The UDF includes a set of urban strategies for the wider estate within which this development proposal will sit. These strategies aim to ensure safe and healthy streets, welcoming and inclusive open spaces, active ground floors, good quality homes and an appropriate character and scale for the estate. The UDF shows how the development proposals will fit into a longer-term investment strategy for the Broadwater Farm Estate, including building refurbishment projects, public realm improvement projects and details of phasing and maintenance, in order to deliver maximum benefits for residents.

- 6.42 The UDF, by providing a spatial and urban design analysis of the existing estate and its surroundings, and also given its collaborative design with significant input from residents, shows that the requirements of SA61 will be met. The UDF shows that this application would reinforce Adams Road and Willan Road as key active east-west links that will connect Lordship Recreation Ground with the existing residential neighbourhood via the new Civic Squares. The UDF also enables the quality of the new housing to be maximised and the visual appearance the existing estate to be improved through the proposed new developments and public realm interventions.
- 6.43 Therefore, by providing a comprehensive and logical long-term plan for the Broadwater Farm Estate as a whole in the form of the UDF produced in collaboration with existing estate residents through a series of public consultation events, it is considered that an appropriate masterplan for the future development of the estate has been provided which is in accordance with Policy DM55 and delivers the wider objectives of Site Allocation SA61.

Other Site Allocation Objectives

- 6.44 The masterplanning and estate renewal objectives of SA61 have been considered above and the other site allocation objectives, including the provision of an appropriate housing mix, land contamination considerations and connection to a district energy network will be discussed in the relevant sections below

Provision of Non-Residential Uses

Moselle School

- 6.45 Policy S3 of the London Plan states that there should be no net loss of education facilities unless it can be demonstrated that there is no ongoing or future need. The Moselle School has been closed since 2011 when pupils relocated to the adjacent Brook and Willow schools and the nearby Riverside School. It was demolished in early 2022. As pupils have been accommodated in other local schools and there is no longer a need for this school on the site.

Health Facilities

- 6.46 Policy S2 of the London Plan states that new high-quality and enhanced health and social care facilities that meet an identified need and provide new models of care should be supported. Policy DM49 of the Development Management DPD seeks to protect existing social and community facilities unless a replacement facility is provided which meets the needs of the community.
- 6.47 The utilisation of the existing medical centre is sub-optimal, with less than half (130sqm of 370sqm) of the building operational and opening hours from 8am to 1pm weekdays only. The Council's Connected Communities service operates from the medical centre but can only operate during the existing allotted opening hours.
- 6.48 The new Wellbeing Hub (266sqm) is proposed to replace the medical centre with a modern flexible space that would be easily accessible from the ground floor of the new Tangmere block. The Wellbeing Hub would re-provide existing GP facilities as part of a broader range of services within an improved environment. The Hub would reflect new forms of healthcare provision by enabling health staff and services to be co-located with other related services within local communities, which facilitates greater

and more efficient service integration and improves health outcomes through increased early intervention. With these objectives in mind the Wellbeing Hub has been designed in consultation with GPs, the Clinical Commissioning Group and Connected Communities, with input from local residents, and is expected to enhance the relationship between GP services and the Council's Connected Communities service. The new Hub would not result in a reduction in GP services. The Council's Health in All Policies Officer is in support of this application.

- 6.49 As such, the new health facilities would meet the requirements of London Plan Policy S2 and is therefore acceptable in principle in land use terms.

Enterprise Centre

- 6.50 Policy E2 of the London Plan states that developments that involve the loss of workspace in areas where there is a shortage of lower-cost space should ensure the equivalent amount of floorspace is re-provided. Policy DM40 of the Development Management DPD seeks to facilitate the renewal and regeneration of existing non-designated employment land and floorspace.
- 6.51 The existing Enterprise Centre is formed of 19 units with 665sqm of Class E floorspace. The units are leased to the Broadwater Farm Community Enterprise Works (BCEW) community enterprise. BCEW let the units in a manner through which they can support training and business opportunities for local people.
- 6.52 The Enterprise Centre units (550sqm) must be demolished due to their siting in between Tangmere and Northolt blocks. They would be re-provided in modernised and expanded premises of varying sizes totalling 635sqm and located in strategic positions on the ground floor of the proposed development, which would improve the prominence of these community-led business units and increase natural surveillance throughout the estate by increasing the distribution of business activity.
- 6.53 BCEW would continue to operate the new Enterprise Centre units for a minimum ten-year period.
- 6.54 Given that these business units would be replaced on similar terms in upgraded and expanded premises the replacement Enterprise Centre would meet the requirements of London Plan Policy E2 and is therefore acceptable in principle in land use terms.

New Retail Unit

- 6.55 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, be subject to an impact assessment where required by national policy, and demonstrate that they would not harm nearby town centres.
- 6.56 The proposed development includes a new retail space of 381sqm on the ground floor of a new building on the site of the former Moselle School, fronting onto Adams Road. This unit would primarily serve residents on the estate. The retail unit has been integrated into the development at the request of estate residents seeking access to convenience items. The location of the retail unit would provide further natural surveillance and street level activity onto this part of the Estate which is at a key junction between the new diagonal link through the Estate and Adams Road. The NPPF sets a threshold of 2,500sqm for a retail impact assessment, which is not

triggered by this small retail unit. The retail unit would help to cement Adams Road as a key route within the Estate by attracting visitors into the Estate and increasing pedestrian activity in this area.

6.57 Given its focus on primarily serving Estate residents, and the importance of its siting in urban design terms, the proposed new retail unit would be acceptable in land use terms.

6.58 Summary

6.59 The proposed non-residential uses would replace the existing community and business facilities on the estate in a more appropriate and contemporary format, would contribute to an active local environment and would create up to 25 additional jobs for the local community. As such, the proposed non-residential uses would be considered acceptable.

Affordable Housing and Affordable Housing Mix

Financial Viability

6.60 Policy H8 Part E of the London Plan requires all development proposals including the demolition and replacement of affordable housing to follow the viability tested route and should seek an uplift in affordable housing as well as replacing the existing affordable floorspace. The development replaces all affordable housing (in terms of both units and floor area) that is to be demolished and maximises the affordable housing provision on site as part a development for 100% council rented housing that has been optimised through a rigorous design-led approach. As such, the GLA has confirmed that a financial viability review is not required for this proposal.

Affordable Housing Provision

6.61 Policy H8 of the London Plan requires the like-for-like re-provision of affordable housing floorspace at social rent levels where it is being provided to facilitate a right of return for existing social rent tenants. The London Plan also states that boroughs may wish to prioritise meeting the most urgent housing needs early in the Plan period, which may mean prioritising low-cost rented units of particular sizes.

6.62 Policy SP2 states that the Council will maximise the supply of additional housing to meet and exceed its minimum strategic housing requirement and identifies the Broadwater Farm Estate as one of nine estates in greatest need of regeneration/renewal. Policy SP2 and Policy DM13 of the Development Management DPD call for at least 40% affordable housing to be provided on new developments with a tenure split of 60% affordable/social rent and 40% intermediate housing.

6.63 The proposed development would provide 100% Council Rented properties to replace those homes that are to be demolished, with an uplift of at least 52 Council Rented homes on site. The focus on the provision of Council Rent housing is justified by both the requirements of Policy H8 of the London Plan and the significant identified need for additional social housing in the borough.

Affordable Housing Mix

- 6.64 DPD Policy DM11 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 or located within neighbourhoods where such provision would deliver a better mix of unit sizes.
- 6.65 Haringey's Housing Strategy 2017-22 sets out the target dwelling mix for Social Rent and other low-cost rent housing as being 10% one-bedroom, 45% two-bedroom, 45% three-bedroom and 10% four-bedroom homes. The London Plan and Mayor's Viability SPG states that in order to incentivise developments providing over 75% affordable housing (such as this application), local planning authorities may apply housing mix policies flexibly.
- 6.66 The affordable housing mix for the development proposal is as set out below:

	<i>1 bedroom</i>	<i>2 bedrooms</i>	<i>3 bedrooms</i>	<i>4 bedrooms</i>	<i>Total</i>
No. of homes (existing)	170	8	61	3	242
Percentage mix (existing)	70.2%	3.3%	25.2%	1.2%	100%
No. of homes (proposed)	84	106	60	44	294
Percentage mix (proposed)	29%	36%	20%	15%	100%

- 6.67 The proposals include an over-provision of one-bedroom homes and a slight under-provision of two and three-bedroom homes against the targets stated above. However, in the wider context of the Broadwater Farm Estate as a whole the provision of 35% family-sized homes is considered substantial given that the estate currently includes a much lower proportion of family homes (13%). Furthermore, this development would include a very high proportion (15%) of larger four-bedroom homes of which there are currently very few (less than 1%) on the estate. Overall, the development would result in a 62.5% increase in family homes within the area of this application site, which would help to address existing issues of overcrowding.
- 6.68 This proposal would substantially increase the number and proportion of family-sized and larger family-sized affordable housing on the estate and as such the affordable housing mix is considered acceptable.

Design and appearance

National Policy

- 6.69 Chapter 12 of the NPPF 2021 states that good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.
- 6.70 It states that, amongst other things, planning decisions should ensure that developments function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development, and should be visually attractive due to good architecture, layouts, and appropriate and effective landscaping.

Regional Policy – London Plan

- 6.71 The London Plan 2021 policies emphasise the importance of high-quality design and seek to optimise site capacity through a design-led approach. Policy D4 notes the importance of scrutiny of good design by borough planning, urban design, and conservation officers (where relevant). It emphasises the use of the design review process to assess and inform design options early in the planning process (as has taken place here).
- 6.72 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

- 6.73 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.
- 6.74 Policy DM1 of the 2017 DPD requires development proposals to meet a range of criteria having regard to several considerations including building heights; forms, the scale and massing prevailing around the site; the urban grain; and a sense of enclosure. It requires all new development to achieve a high standard of design and contribute to the distinctive character and amenity of the local area.
- 6.75 DPD Policy DM6 expects all development proposals to include heights of an appropriate scale, responding positively to local context and achieving a high standard of design in accordance with Policy DM1. For buildings projecting above the prevailing height of the surrounding area it will be necessary to justify them in in urban design terms, including being of a high design quality.

Quality Review Panel (QRP)

- 6.76 The development proposal been presented to the QRP three times prior to the submission of this application. The most recent review took place on 16th February 2022. The Panel’s summarising comments of this latest review are provided below.
- 6.77 *“The panel commends the design team’s extensive community engagement and the integration of the community’s aspirations into the proposals. It supports the scale and massing of the proposals and finds much to admire in the architecture. Acknowledging the alignment of the River Moselle establishes a diagonal through route which is positive, but further consideration should be given to the clarity of the section of the route through the Tangmere block. As the design development progresses, a clear and legible hierarchy of spaces should be established throughout the estate; in particular, greater definition of the civic squares is required. Further information is needed on the scope of the Urban Design Framework, including how the scheme fits into the framework and details on the priorities and timelines for all new and refurbishment projects.”*
- 6.78 Since the date of the third 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
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Development Approach / Urban Design Framework	
<p>The success of the scheme will be heavily reliant on the refurbishment of the remainder of the Broadwater Farm Estate. Further details are needed on the Urban Design Framework, to demonstrate how the scheme fits into it and to give officers confidence that the long-term vision for the estate has been carefully considered.</p>	<p>A thorough and comprehensive UDF has been provided that outlines the urban strategies that would be implemented across the estate and how this application fits within that wider vision. A detailed long-term masterplan has also been provided as part of the UDF (page 148).</p>
<p>As noted in the previous report, more information is needed on how the three work streams – the new build, the pilot project retrofit scheme and the bank of mini projects – will fit together.</p>	<p>The UDF includes details of a series of future projects that fit into the long-term masterplan in Section 3, which includes public realm improvements and pilot projects for Martlesham and Rochford blocks and Griffin Road.</p>
<p>A prioritised list of the retrofit and bank of mini projects and a timeline for their delivery, will give officers confidence that residents will be assured a high quality of life throughout all phases of the works.</p>	<p>The UDF also includes detailed and comprehensive information on three projects which are of a higher priority and expected to be implemented relatively soon. Other projects have a longer timeframe. All projects are dependent on funding and further design work and as such detailed timeframes cannot be provided at this stage.</p>
<p>For example, it is crucial that the refurbishment of the existing buildings to the north and west edges of the new public park are given high priority, so that a high-quality open space is assured from the outset.</p>	<p>Works to the ground floor of Manston and Lympe buildings (immediately north and west of the proposed new park), along with works to Adams Road north of the park, have been identified as Project 1 in the list of the projects. Early implementation of this particular project would be sought as part of the Council's Estate Improvements Programme.</p>
<p>The panel had also suggested, in the previous report, that the bank of mini projects could be prioritised to reinforce the green link to the Lordship Recreation Ground, in addition to testing out and improving lighting solutions across the estate.</p>	<p>A 'green' connection to Lordship Recreation Ground would be reinforced through Project 1 (see above) and Project 2 which would provide an improved entrance to the park in addition to the public realm around the community centre in the north-west corner of the site. Both schemes would improve lighting, wayfinding and provide new tree and other planting.</p>

<p>Further details are also needed on the hierarchy of streets and spaces, as well as the types of spaces being created and the activities that will be included for all age groups within each of them.</p>	<p>One of the key aims of the UDF is to 'create safe and healthy streets', and the UDF states that this would be achieved through the creation of a clear street hierarchy. Adams Road is to be prioritised as a 'green link' through the estate and Willan Road a key connection to the nearby Lordship Recreation Ground. 'Welcoming and inclusive open spaces' is also a key aim of the UDF and as such it is considered these matters have been addressed comprehensively within the submitted UDF document.</p>
<p>The Urban Design Framework should include details on circulation and movement including new entrances and lobbies and the location of cycle and bin stores.</p>	<p>The UDF provides a detailed section on the quality of the proposed new housing and explains in detail how the internal spaces including communal entrances and the resident journey from entrance to front door have been considered. Details include information on internal cycle and utility space areas. Further information on bin and cycle storage is provided within the Design and Access Statement.</p>
<p>Public Realm / Landscape Design</p>	
<p>The panel feels that further work is needed to establish a clear and legible hierarchy of spaces throughout the estate. This should be reinforced by the lighting proposals, to ensure that the estate is safe and accessible for all.</p>	<p>The UDF and Design and Access Statements demonstrate a clear street hierarchy with Adams Road a priority 'green link', Willan Road a key secondary route, and both of these east-west streets connected by the new diagonal route, public park and civic squares. Lighting will form an important element of the street and building entrance designs and further details of lighting would be secured by condition.</p>
<p>The nature of the two new civic spaces need greater definition, to clarify the purpose of these spaces within the wider estate and to ensure that they are more positively framed by adjacent buildings and active uses.</p>	<p>The UDF includes a section that specifically describes how the civic spaces would function. These spaces would anchor the new public park and are designed with seating and planting integrated to form active locations within the public realm for social gathering, public life and incidental play.</p>

<p>The panel welcomes the new diagonal through-route that follows the path of the Moselle River from Gloucester Road, in the south west, to Adams Road, in the north east. The section of the route through the Tangmere block needs further clarity. One suggestion is that the south-west corner of the block could be opened up to make the route more inviting and to support the design team's aspiration to create a desire line that is used by both residents and the wider public.</p>	<p>The south-west corner entrance to the Tangmere building courtyard is open to the public and its location would be highlighted by the chamfered street corner located where the road south of Tangmere meets Gloucester Road. This is an accessible route during the day but will be closed at night for security reasons and as such this has not been highlighted through the proposed built form as a primary route through the estate. High quality public realm is also available around all other sides of the Tangmere building.</p>
<p>The panel understands that the proposal for the courtyards to be open to the public, with controlled access at night, has been driven by community engagement. It suggests that it would be beneficial to have one clear and consistent strategy for all the courtyards across the estate, including access control and how this is implemented and managed.</p>	<p>This is indeed the case. Courtyards shall be open during the day for public access and use and shall be closed at night to ensure these spaces are secure. A detailed management plan for these courtyards would be secured by condition.</p>
<p>Further consideration should be given to how the Moselle block will address the adjacent school car park and green space.</p>	<p>The existing car parking area for the former school currently dominates the street frontage on Adams Road. Although the school has closed the car park is still used for staff parking relating to the adjacent school which is currently operational. The car park has been re-configured to best meet the objectives of providing an active street frontage and retaining parking for the existing school that can be accessed from Adams Road. The play area would also be retained by the existing school and reconfigured to improve its accessibility and usage.</p>
<p>Consideration should be given to who will be responsible for the ongoing maintenance of the landscape, in particular, planting defining the defensible space of the ground floor flats.</p>	<p>Maintenance of the public realm areas on the estate is currently managed by a combination of Council departments including Parks and Highways under the supervision of the Council's Housing section. Details of maintenance would be secured by planning condition.</p>

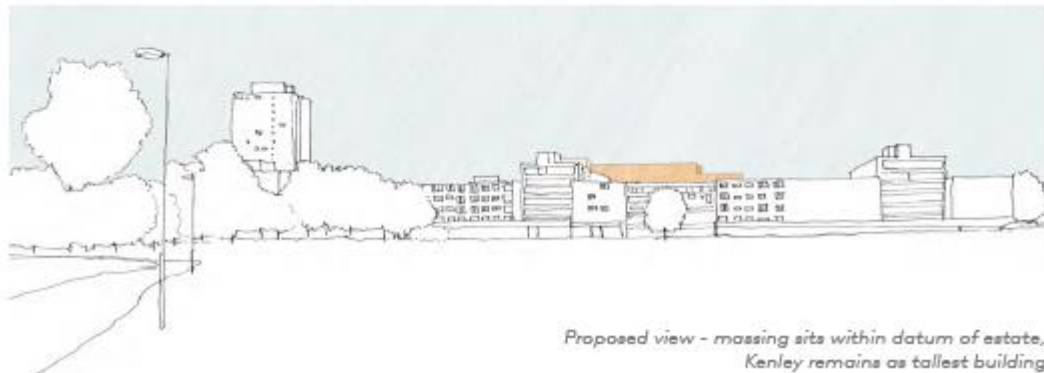
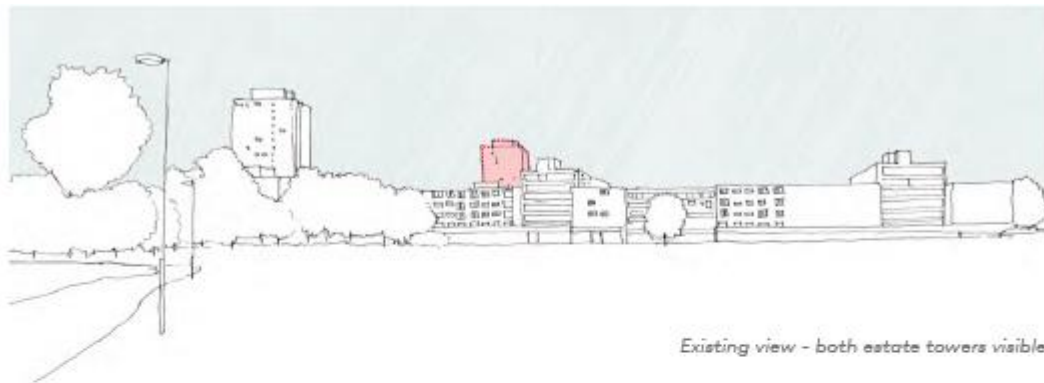
Architecture	
<p>The panel finds much to admire in the architecture and would encourage the design team to be bolder in their approach. For example, the introduction of characterful buildings or moments in key locations would add richness and variety that would benefit the scheme.</p>	<p>The architecture for the new buildings has been developed in consultation with residents over two years and residents identified these designs and materiality as the preferred approach. Characterful elements and moments of delight would be considered as part of the future pilot projects and wayfinding installations.</p>

- 6.79 As set out above, the applicant has sought to engage with the QRP during the pre-application stage, and 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 that the points raised by the QRP have been addressed to an appropriate extent.

Assessment

Height, Scale and Massing

- 6.80 Policy D9 of The London Plan 2021 states that buildings of six storeys or more may be considered as tall buildings and that Councils should define what is considered a tall building in their local plans. Tall buildings are defined in the Council's Development Management DPD as those buildings which are of 10 storeys or greater. The new buildings within the proposed development would be a maximum of nine storeys in height. As such, the proposed development by definition would not include any tall buildings.
- 6.81 Policy DM5 of the DM DPD states that obstructions to locally significant views should be minimised.
- 6.82 The development would remove the nineteen storey Northolt building from the site, replacing it with new buildings with a more evenly distributed massing and a much lower built form no greater than nine storeys in height, which is below the threshold for a tall building as set by the Council's Local Plan. Proposed building heights would not exceed those rising above the general eight storey datum through the wider estate. These new buildings would have an improved relationship with local streets by way of their more consistent scale.



- 6.83 The southern part of the development would be located within locally significant view no. 20 (Watermead Way railway bridge to Alexandra Palace). The development would locate the relatively low-scale terraced houses and the southern side of the replacement Tangmere building in the location of that protected view. These elements of the development proposal would not be significantly visible from outside of the existing estate and as such would not obstruct the protected view.
- 6.84 As such, it is considered that the proposed buildings would be of a height, scale and massing that would improve the character and appearance of the area, and would also have a minimal impact on a protected view.

Development Layout, Form, Massing and Height

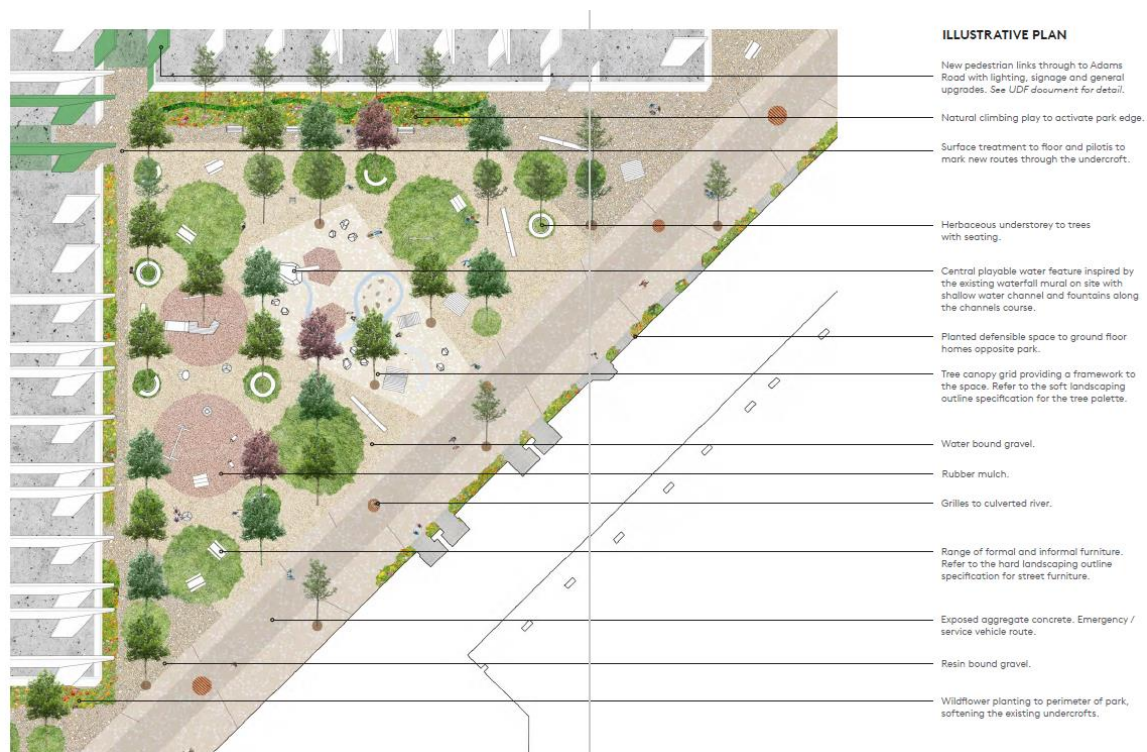
- 6.85 The proposals embrace the best of the architectural style and form of the existing estate, provide a clear definition between streets and spaces, and incorporating shared central courtyards. Courtyards would be defined with secure boundaries that provide clear demarcation between public and shared private realm in accordance with best urban design practice.
- 6.86 At the southern end of the site new terraced townhouses would back onto the existing houses to the south, matching them in scale form and height. The typologies of houses in his area would be similar with terraced properties proposed and back gardens sited against the existing back gardens, with the new three storey providing a step up in scale into the estate from the two storey existing terraced homes. Similarly at the northern end of the proposed development, the northern side of the new Moselle block is to be formed of a row of townhouses, matching the scale of the existing housing to its north.

Elevational Composition, Materials and Detailing

- 6.87 The elevational composition of the proposed buildings would also reflect the best elements of the existing estate, combined elegant contemporary design features. The regular, gridded facades of the upper floors of the proposed buildings would echo the existing estate. The new buildings would include an additional distinctive base, which is a familiar characteristic of contemporary mansion block developments, and which contribute to rooting the proposed blocks in their street or space. Clearly identifiable front doors would be provided to ground floor maisonettes, communal entrances and non-residential uses. Front gardens would be provided to ground floor flats and maisonettes. The proposed communal entrances are particularly thoughtfully designed, with generous floor to ceiling heights and glazed areas giving an airiness and spaciousness to these areas, whilst durable materials within them would provide a sense of occasion and functionality.
- 6.88 Further on the design detailing, gable ends are also picked out with contrasting solids and voids, echoing the gridded facades of drying rooms in the gable ends of some existing blocks. Non-residential ground floor uses have shopfront designs appropriate for their intended uses feature clearly distinguished signage zones. The tops of taller buildings are expressed as a crown, adding to their distinctiveness and aiding their elegance of composition.
- 6.89 The proposed materials palette incorporates a significant amount of pre-cast concrete, echoing the use of this distinctive feature on the existing estate. Brick features almost as strongly in the proposed development, thus the new buildings reconcile the finishing materials of the both the exiting estate and the existing housing in the surrounding area. This material palette would be durable and would maintain an attractive appearance over time, provided the quality of specification and detailing is maintained by condition. This warm palette of familiar finishing materials would be complemented by deep colours for joinery and metalwork, with a subtly different and distinctive brick and colour used for each of the three blocks to help with wayfinding and identification.

Public Realm

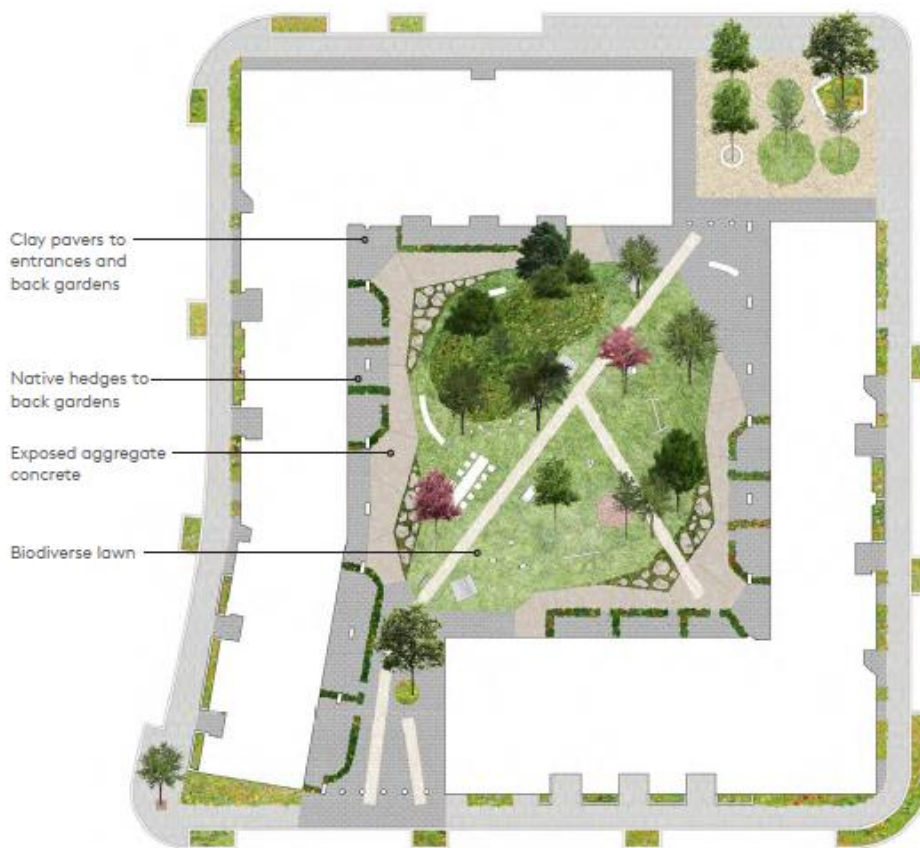
- 6.90 The proposed development would include high-quality improvements to public realm areas including two new civic squares, a new park and internal courtyard amenity spaces. These public and amenity spaces have been designed to be safe and well-activated with high levels of natural surveillance.



- 6.91 The large park would be new key public space at the heart of the estate for both new and existing residents to spend time together. It would include tree planting, play equipment, seating and a water feature to maximise the benefits for residents of all ages. The park would replace the existing Memorial Gardens at the south of the site which are currently not well used and do not benefit from a lack of natural overlooking and passive surveillance. The local policing teams have been contacted by the Council's Community Safety Officer and it is confirmed that the Police support the principle of moving the Memorial Gardens to the centre of the estate where they can be more easily accessed by everyone. Details of the relocation of the memorial plaque in the gardens would be secured by condition. The Designing Out Crime Officer of the Metropolitan Police also supports the relocation of the Memorial Gardens.
- 6.92 The park is bookended by two civic spaces – one at the junction with Willan Road and another at the junction with Adams Road. The civic squares highlight the new diagonal route through the estate and the location of the new park by widening the space between the built form in these areas. They provide new greenery in the form of tree and flower planting as well as seating. Their wide and open nature enables their use for a range of public and community uses. The new route follows the Moselle Brook watercourse which runs in a culvert under the estate and the presence of this watercourse is highlighted through the inclusion of grilles into the new pathway as well as the inclusion of the water feature.



6.93 The courtyard spaces at the ground floor of both the replacement Tangmere and Northolt buildings would be open to the public during daylight hours. The Tangmere courtyard would form an extension to the new diagonal route through the site, connecting Adams Road and Gloucester Road during those times when the courtyard is open. The courtyards would have large amounts of tree and flower planting as well as clearly defined pathways. The courtyards would be bordered by private amenity areas for the ground floor residential properties. These spaces would have significant levels of natural surveillance from the proposed flats and access would be secured outside of daylight hours through gates. This is considered to provide the optimum balance between providing good quality space and security for residents.



6.94 To summarise, the new public realm areas would substantially improve pedestrian routes through the site and would bring the landscaped character of the adjacent Lordship Recreation Ground into the estate through significant amounts of new planting. The provision of seating and play space enables use of these spaces by a wide range of residents and maximises community activity in these areas. The new public realm would replace the existing poorly designed undercroft areas, replacing them with spaces that would be well-used and which would be subject to high levels of natural surveillance from existing and new homes and the proposed commercial and community uses. These public realm spaces would contribute towards the longer term objectives for the estate, as laid out in the Urban Design Framework, which is to improve the primacy and levels of activity on Adams Road and Willan Road as well as to increase the clarity of routes through the estate.

Summary

6.95 The proposed development would replace two buildings which must be demolished for safety reasons, plus other ageing structures, with a series of high-quality buildings of contemporary design that have a lower maximum height than the existing buildings within the application site, that have been designed to be reflective of the unique characteristics of the estate, that rearrange the public realm to bring activity onto surrounding streets and which significantly improve local safety and security. The buildings would have a more consistent height, scale and massing than the existing buildings on the application site and would make the best use of the available space on and around the site to maximise the provision of affordable housing. The buildings would not be significantly visible from outside of the existing estate and would not have a detrimental impact on protected local views. As such, they would appear as positive design features that would not appear out of keeping with the surrounding area and significantly improve the local built environment.

- 6.96 The development is supported by the Quality Review Panel. The Council's Design Officer supports the development by stating that: *"These proposals are an exemplary insertion into a large existing council estate, helping to resolve some of the [public safety and urban design] problems of large undercrofts and the ground frontage of pilotti [stilts] with new more street focussed buildings set around a series of logical routes and exciting public civic squares, landscaped courts and the new central garden square. The proposals will also help bridge the boundaries between the existing estate and surrounding streets, in their architectural expression and in the network of pedestrian friendly streets containing what should be attractive non-residential activities"*.
- 6.97 As such, it is considered that the development is acceptable in design terms.

Heritage impact (including listed building consent matters)

Heritage Context

- 6.98 The Estate is not located within a conservation area. It does not contain any locally listed buildings. The Mural on Tangmere block is Grade II listed. There are no other listed buildings on the Estate. The Tower Gardens Conservation Area is 190 metres to the north of the site. The Peabody Cottages Conservation Area is also a short walk to the north of the site. The Bruce Castle and Bruce Grove Conservation Areas are nearby to the north-east and east respectively.
- 6.99 There are several listed and locally listed buildings within the Bruce Castle and Bruce Grove Conservation Areas, including the Grade I listed Bruce Castle.

Legal Context

- 6.100 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."
- 6.101 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."
- 6.102 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.

- 6.103 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.
- 6.104 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

- 6.105 London Plan Policy HC1 seeks to ensure that development proposals affecting heritage assets and their settings should conserve their significance. This policy applies to designated and non-designated heritage assets. Local Plan Policy SP12 and Policy DM9 of the 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.
- 6.106 Policy DM9 also 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.

Assessment of Impact on the Grade II Listed Mural

- 6.107 The planning application requires the demolition of Tangmere building, to which a Grade II listed mural is attached. It is relevant to note that permission for the demolition of Tangmere has already been granted separately (via the 'prior approval' permission process) on 1st April 2022 (application ref. HGY/2021/0742), which was prior to the listing of the mural on 5th October 2022.
- 6.108 A listed building consent application has been submitted alongside the full planning application, which proposes to remove the listed mural from Tangmere, restore it, and install it in a new location within the Estate.
- 6.109 The mural is a large colourful mosaic that wraps around three sides of the refuse chute at Tangmere, and which extends to six storeys in height. It is described within its listing as being 'exemplary in its degree of survival, scale and artistic quality'. It was erected following the riots on the Estate in 1985 and thus has significant national cultural and heritage significance. Notwithstanding this, the mural is not significantly visible from most parts of the Estate due to the large scale of many of the estate buildings, the

narrow width of Willan Road and the presence of an entrance hall structure around the lower parts of the mural. The mural is currently in need of repair due to damage from vandalism, water ingress and earlier building works.

- 6.110 The listed building consent application proposes the careful dismantling of the mural and its (unlisted) attached refuse chute to enable the removal of the mural from the main structure of the Tangmere building. This would enable Tangmere to be demolished, in accordance with the earlier permission and the planning application. The mural would be stored, repaired by a specialist contractor, and brought back to site on a bespoke frame for installation elsewhere within the Estate. The proposed location for the restored mural is on the eastern elevation of Hawkinge building, which is located opposite Tangmere.
- 6.111 Historic England has stated its support of the listed building consent application. They acknowledge that there would be a minor loss of mural fabric resulting from the cutting operations required to remove it from the existing refuse chute. However, once removed, the mural would be fully cleaned, repaired and restored. The improved mural would then be installed in a location that is much more visible within the Estate than its current location, as the eastern elevation of Hawkinge would be adjacent to the new public open space in the heart of the redeveloped part of the Estate.
- 6.112 Historic England has determined that the proposed dismantling of the mural would cause a low degree of less than substantial harm to the significance of the mural, whilst the proposed repair and re-erection works would have a positive impact on its significance. As such, Historic England determine that there would be positive heritage benefits to the listed building consent application proposals.
- 6.113 The Council's Conservation Officer also supports the listed building consent application and the proposed removal, restoration and re-erection of the mural, as described above, also stating that there would be a low level of less than substantial harm initially, followed by the positive benefits of its restoration and the enhanced visibility of its new location. In order to ensure these positive benefits are secured conditions are recommended to form part of the listed building consent.
- 6.114 Assessment of Impact on Other Heritage Assets and their Setting
- 6.115 The setting of a heritage asset is defined in the glossary to the NPPF as: "The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral". There is also the statutory requirement to ensure that proposals 'conserve and enhance' the conservation area and its setting.
- 6.116 The development proposal includes buildings of up to nine storeys in height that would be erected in the centre of the existing Estate. The nearest heritage asset is 190 metres away. Given the substantial size, scale and number of buildings between the proposed development and the other heritage assets identified in the wider area it is considered that the proposed buildings would not be visible to any significant extent within the backdrop of local heritage assets and would thus not affect their respective settings.
- 6.117 The Council's Conservation Officer has reviewed the proposals contained within the planning application and raises no objection from a conservation perspective as no

heritage asset (other than the Grade II listed mural as described above) or its setting is expected to be affected by this proposal, and proposals to remove, refurbish and relocated the mural as proposed by the listed building consent application would lead to overall positive impacts on local heritage.

6.118 *Heritage Impact Summary*

6.119 As described above the planning application would result in the loss of the existing mural on Tangmere building from a heritage perspective. It would not impact any other heritage asset or its setting. The listed building consent application proposes to sensitively remove, refurbish and re-erect the mural in a prominent location within the Estate that would have a positive impact on local heritage.

6.120 Therefore, the proposed development is considered acceptable in terms of its impact on built environment heritage assets as it would result in overall benefits and enhancements to the local heritage context, subject to conditions, thereby preserving the special architectural and historic interest of the mural.

Archaeology

6.121 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.

6.122 The site is not located within an archaeological priority area. The Greater London Archaeological Advisory Service (GLAAS) has been consulted on this application. GLAAS advises that the development proposal would be unlikely to have a significant effect on heritage assets of archaeological interest.

6.123 As such, the proposed development would be acceptable in terms of its impact on archaeology.

Residential Quality

General Layout

6.124 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.

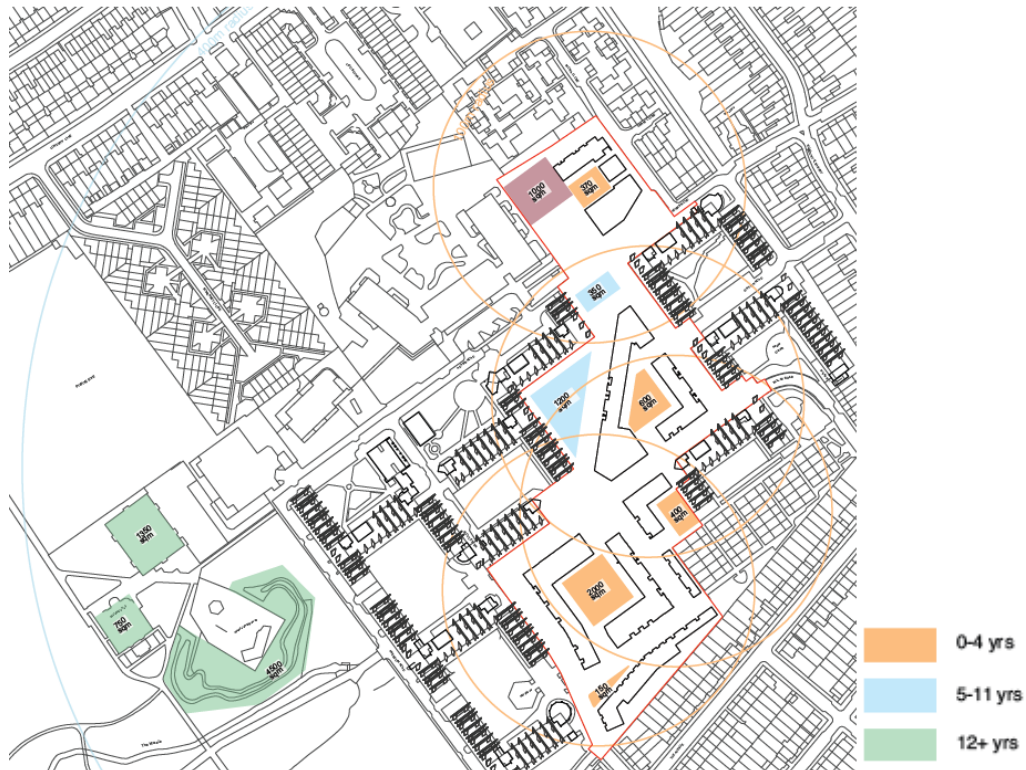
6.125 The Mayor of London's Housing SPG seeks to ensure that the layout and design of residential and mixed-use development should ensure a coherent, legible, inclusive and secure environment is achieved. Policy DM1 requires developments to provide a high standard of amenity for its occupiers.

- 6.126 In general terms, the development is of a very high-quality layout and residential standard, having been through a rigorous design process including assessment by the Quality Review Panel.
- 6.127 All properties meet the internal space standards of the London Plan and the floor-to-ceiling height and homes per core requirements of the Housing SPG. All new homes would be dual or triple aspect. Family-sized homes are located at ground floor level where possible. Homes have been designed to minimise circulation spaces and maximise living areas. They would be well-lit and well-ventilated. Storage and utility space has been integrated into all floors including cycle stores for larger homes.
- 6.128 A mix of open plan and separated kitchen/living spaces would be provided to ensure residents have a choice and are easily able to adapt their homes to their preference. In larger homes all kitchens and living spaces will be provided separately.

Amenity and Children's Play Space

- 6.129 Standard 26 of the Mayor's Housing SPG requires that all homes should benefit from a private amenity space of at least 5sqm (or greater as required) and the proposed development meets this requirement through the provision of balconies, terraces and rear gardens as appropriate. All properties also have access to the new shared courtyards and public realm areas.
- 6.130 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 10sqm per child should be provided to all qualifying developments.
- 6.131 The projected child yield of the development is 327 children, which means there is a requirement for 3,273sqm of play space to be provided to support the development. The table below shows how the play space requirement would be met. Play space for 0–4 year-olds would be provided within courtyard spaces and adjacent to the new terraced houses. Play space for 5-11 year-olds is proposed as a mixture of formal and informal play throughout the new public realm. Play space for older children (12+) is available within the Lordship Recreation Ground, which is within a short walk of the application site.

Age Range	Play Space Requirement	On-site Provision
0-4	1,271 sqm	3,520 sqm
5-11	1,066 sqm	1,550 sqm
12+	936 sqm	6,600 sqm (available off-site)



6.132 The proposed development provides a cross-generational play strategy that complements the existing play infrastructure on the existing Estate and meets the policy requirements for children’s play space on or in close proximity of the estate.

Access and Security

6.133 London Plan Policy D5 requires all new development to achieve the highest standard of accessible and inclusive design, seeking to ensure new development can be used easily and with dignity by all. 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. DPD Policy DM2 also requires new developments to be designed so that they can be used safely, easily and with dignity by all.

6.134 30 homes (10.2%) would meet the required wheelchair user dwelling standards as laid out within Building Regulations requirement M4(3), which exceeds the 10% policy target. Four of these wheelchair user homes would be larger three-bedroom properties. The wheelchair user homes are evenly distributed throughout the proposed development and would be located close to the ‘Blue Badge’ parking spaces. The wheelchair user homes on upper floors would be accessible via building cores with two lifts.

6.135 The development would significantly improve safety and security on the estate by replacing the car-dominated undercroft areas with active residential frontages and commercial/community spaces. New communal entrances would be light and welcoming with direct access from the estate’s main streets. The communal residential lobbies have been designed to meet contemporary accessibility and security standards and would be visually attractive spaces finished in robust materials.

6.136 The new courtyards would be closed off outside of daylight hours, with fob access for residents only after this time. The exact management arrangements would be secured by condition. The Designing Out Crime Officer of the Metropolitan Police has been

consulted throughout the design process of this proposal. Reinforcing Willan Road and Adams Road as key routes through the site, relocating the Memorial Garden to the centre of the estate and providing access controls for the residential courtyards are all initiatives that are supported by the Designing Out Crime Officer. The Council's Community Safety team also raise no objection to the proposals.

Outlook, Privacy and Day/Sunlight

- 6.137 The new homes would all be dual aspect at a minimum which enables light to permeate into the dwellings for large parts of the day throughout the entire year. 88% of habitable rooms would meet the BRE's guidance for daylight, which is a very good result for an urban environment. Sunlight levels are lower with 59% of all living rooms meeting the annual sunlight targets. This is a good level for an urban area, and this result is affected by 66 (23%) of all living rooms receiving reduced light due to their orientation within ninety-degrees of due north. All properties would have access to an appropriately sized amenity space and a range of public open spaces which will receive good levels of light throughout the year.
- 6.138 The separation distances between the proposed and existing buildings are similar to those on the existing Estate. These distances are significant enough to ensure that the new homes would benefit from good levels of privacy and outlook.

Air Quality and Noise

- 6.139 Air pollution levels at this site are predicted to be below statistically significant levels which makes the site suitable for residential accommodation. Modelling of the energy centre boiler outputs shows that any impact from the low-emissions boilers would be negligible. There are no significant noise-creating uses in the vicinity that would adversely impact on the amenity of future residents in this regard.
- 6.140 As such, the residential quality of the proposed development is of a very high quality and in accordance with the policies referenced above and is therefore acceptable.

Wind Microclimate Impact

- 6.141 A computer modelling analysis has been undertaken and presented within a *Wind and Microclimate Assessment* document submitted with the application. Five (12.5%) of the 40 locations tested showed minor adverse effects and only two (5%) showed moderate adverse effects. The sites where wind impacts were noted were located in higher altitude areas, for example upper floor balconies, where higher wind speeds would usually be expected. Entrances to buildings would not be significantly affected by wind according to the submitted document.
- 6.142 As such, the low level of minor or moderate adverse impacts shown in the submitted document are considered not to be material and would be within acceptable levels of tolerance.

Maintenance

- 6.143 It is anticipated that most windows would be cleaned internally by residents and windows have been designed to open inwards to accommodate this approach. Communal area windows and building facades would be accessed and maintained by the Council via mobile elevated work platforms.

Impact on Neighbouring Amenity

- 6.144 London Plan Policy D6 outlines that design must not be detrimental to the amenity of surrounding housing, in specific stating that proposals should provide sufficient daylight and sunlight to surrounding housing that is appropriate for its context, while also minimising overshadowing. London Plan Policy D14 requires development proposals to reduce, manage and mitigate noise impacts.
- 6.145 Policy DM1 of the Development Management 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 avoid material levels of overlooking and loss of privacy and detriment to amenity of neighbouring residents.

Day and Sunlight Impact

- 6.146 The BRE guidelines for day/sunlight in proposed developments was updated in June 2022. On the date this application was submitted the former BRE guidelines from 2011 were still relevant. The *Daylight and Sunlight Report* submitted with the application has modelled the development against the 2011 guidelines. Although these have now been replaced it is considered that they still provide an appropriate guide against which to assess levels of residential amenity in new residential development in accordance with adopted policy.
- 6.147 Debden, Hawkinge, Lympne, Manston, Martlesham, Rochford and Stapleford buildings are within the vicinity of the proposed development and as such only these buildings have been assessed for the day and sunlight impact on them. The potential impact on the homes at 25-30 Willan Road has also been assessed.
- 6.148 In terms of daylight impact the analysis undertaken shows that most buildings would not be significantly affected by the proposed development. The majority (71%) of the windows tested (667) across all buildings referenced above would not experience a noticeable change in daylight according to the BRE guidance. For a further 21% of those windows assessed there would be a noticeable change in daylight conditions, but the degree of loss of daylight is not considered to be significant, i.e. there would be a less than 40% reduction in daylight conditions. As such, only 49 windows (7%) would experience a significant noticeable change in daylight conditions. This would affect homes in Debden, Rochford and Stapleford buildings only.
- 6.149 The analysis notes that where there is a significant reduction in daylight to the windows in Debden and Stapleford buildings, they would still retain a minimum of 16% vertical sky component (VSC) in absolute terms (compared to a 27% target) which is considered a good level of daylight for an urban area. Eight windows on Rochford block would have significant reductions in daylight to a level below 6% VSC. However, it is notable in the case of all these windows that they each currently experience highly restricted levels of daylight (less than 10% VSC) and thus again the reduction in absolute terms is not considered to be excessive.
- 6.150 In terms of sunlight, the analysis undertaken shows that the vast majority (92%) of the windows tested (355) across all buildings referenced above would receive acceptable levels of sunlight according to the BRE guidance. All other windows are not expected to experience noticeable levels of change.

Privacy and Outlook Impact

- 6.151 The rear elevations of the new townhouses would be at least 20 metres from the rear walls of existing houses both within and surrounding the estate. Distances between the homes within the replacement Tangmere building and the existing flats within the nearby Debden and Hawkinge blocks would also be at least 20 metres. Distances between the homes within the replacement Northolt building and the existing flats within the nearby Martlesham and Rochford blocks would be marginally less at a minimum of 19 metres. These separation distances are very good for an urban environment.
- 6.152 In some areas of the site the separation distances are lower than stated above. The distances between the proposed building on the former Moselle School site and the existing homes on Moira Close is a minimum of 14 metres. There is also one property within 7 metres of the proposed development in this part of the site. However, in those cases that the existing homes are oriented at a ninety-degree angle to the new building on the former Moselle School site and there are no habitable room windows within the side elevations of those existing homes. Furthermore, garden areas for the homes on Moira Close are communal open areas and not private gardens so already have a low level of privacy.
- 6.153 Main habitable rooms for most flats in the new building on the former Moselle School site would be located on either the western or southern sides to minimise overlooking towards the school. The three-bedroom flats on the southern side of the courtyard could overlook the play area from their amenity areas. This is a very small number of family units in the context of the overall development. A condition would be included to ensure that appropriate screening features would be included as appropriate to the northern sides of these amenity spaces and also to the western side of the amenity areas for the westernmost terraced house on the northern side of the same building, to ensure that overlooking towards the school is minimised.
- 6.154 There is no direct overlooking between the replacement Northolt building and the existing Lypne block as the buildings are oriented at an angle to one another. The new Northolt building would be 13 metres away from the retained Stapleford block and, whilst this is a lower separation distance than between many other buildings on the estate, it is not considered to be unacceptable for an urban environment. The development has also been designed to minimise the number of main habitable rooms on the southern side of the building to ensure that overlooking is not excessive.
- 6.155 As such, it is considered that the outlook and privacy impacts on existing residents would not be significant.

Wind Microclimate Impact

- 6.156 A computer modelling analysis has been undertaken and presented within a Wind and Microclimate Assessment document submitted with the application. The document shows the development would have a limited impact on local wind conditions within existing public realm areas. The majority of locations assessed around and within the site at ground level show that the development would have either a negligible or beneficial impact on the existing wind conditions. Planting such as trees around seating areas would also help to mitigate wind effects and increase comfort conditions.

Air Quality, Noise and Light

- 6.157 Policy DM23 states that developments should not have a detrimental impact on air quality, noise or light pollution. Policy S11 of the London Plan states that development proposals should not lead to a deterioration of local air quality.
- 6.158 The *Air Quality Assessment* submitted with this application confirms that the impact of the proposed new boilers and the anticipated small increase in the number of vehicle trips from the additional homes on site would have a negligible impact on local air quality.
- 6.159 The additional 52 homes on the estate would not create a significant amount of new noise in the local environment. The proposed non-residential uses would not be particularly noise-creating and would therefore be suitable for a predominantly residential environment. Noise and fumes from extraction and other plant equipment associated with non-residential uses would be controlled by condition.
- 6.160 The development would incorporate new artificial lighting into key areas, including the new diagonal route and civic squares, to improve safety and security for residents and visitors. This lighting would be sensitively designed to maximise safety whilst minimising unnecessary light spill. This matter can be adequately controlled by condition.
- 6.161 As such, the air quality, noise levels and artificial light impact on neighbouring properties would not be significant.

Construction Impact

- 6.162 The demolition and construction works required to enable this development proposal would result in some dust and particulate matter, noise and other temporary disturbances. These processes are typically controlled by non-planning legislation. It is possible to manage these disturbances through good practice and through the implementation of suitable mitigation measures. The demolition and construction methodology for the development would be controlled by condition to minimise its impact on existing residential properties and non-residential activities.
- 6.163 As such, it is considered that the impact of the proposed development on the amenity of neighbouring properties and other activities on the estate is acceptable.

Parking and Transport

- 6.164 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.
- 6.165 Local Plan Policy SP7 states that the Council aims to tackle climate change, improve local place shaping and public realm, and environmental and transport quality and safety by promoting public transport, walking and cycling. This is supported by DPD Policy DM31.

- 6.166 The PTAL of the estate is between 1b and 2. The site is located within the Bruce Grove West Controlled Parking Zone (CPZ). However, it is understood that parking is not currently actively controlled on streets within the estate.
- 6.167 A *Transport Assessment* and a *Parking Design and Management Plan* have been submitted with the application. The Council's Transportation Officer and Transport for London (TfL) have provided comments on the proposed development.

Background

- 6.168 There is currently a significant oversupply of car parking across the estate, including within undercroft areas and on streets throughout public realm areas. This car dominance has led to a perceived lack of safety and security on the estate through car-dominated and inactive streets in many areas, as well as perpetuating a low-quality pedestrian environment by cluttering key routes. The proposed redevelopment works would substantially improve the safety of the pedestrian environment by removing car parking where possible and replacing it with active residential and commercial street frontages and new landscaping.
- 6.169 The development would re-introduce parking controls to ensure that car parking within the estate prioritises the existing and proposed residents. Underutilised areas of parking within the application site would be redeveloped and replacement parking would be provided in a more efficient manner in accordance with anticipated parking demand from residents.
- 6.170 Parking throughout the estate is currently controlled by the Council, which requires estate residents to display a valid permit as well as meeting other conditions. It is expected that, in order to ensure these management arrangements are followed and the reduced number of parking spaces on the estate are occupied efficiently, the existing CPZ will be re-instated for public streets. For private streets, these would be managed by the Council on similar lines to the CPZ. Parking permits would be allocated to residents, visitors and essential services on request.
- 6.171 There are currently 225 parking spaces within the application site boundary. 91 of these spaces would be retained as part of this development proposal. 3% 'Blue Badge' parking spaces would be provided on first occupation of the development and, if there is demand for these spaces from wheelchair users, additional spaces could be converted in the future. 660 cycle parking spaces would also be provided as part of this proposal.

Assessment

Site Access and Road Layout

- 6.172 The main vehicle and pedestrian access points to the estate would remain as existing. New internal streets are proposed, and these would provide improved connectivity within and through the site. Their design is intended to provide improved legibility and accessibility for pedestrians and cyclists as well as providing suitable space for vehicle movements including buses. They would integrate appropriately with the wider Urban Design Framework for the estate.

- 6.173 Parts of the public highway must be 'stopped up' for the development to be built and sections of land must be adopted as highway to straighten up the current highway layout. These matters would be secured through legal agreement.
- 6.174 The Transportation Officer and Transport for London have raised no objections to these new road layouts. Details of the new junctions within the estate must be reviewed through Road Safety Audits which can be secured by condition.
- 6.175 The application would provide a financial contribution towards the feasibility and design of local cycle infrastructure as potential improvements near to the site have been identified in the Council's Walking and Cycling Action Plan. A further contribution would be secured towards reducing accidents at local road junctions.

Trip Generation

- 6.176 The existing, proposed and net residential trip generations have been reviewed by the Council's Transportation Officer and found to be acceptable. The non-residential land uses would have a local catchment and therefore generate local visits undertaken primarily by active travel modes such as walking and cycling.
- 6.177 There would be an additional ten delivery and servicing vehicles per day compared to the existing situation and this additional demand would be easily absorbed by the local highway network.

Public Transport

- 6.178 Gloucester Road and Willan Road would be widened to potentially accommodate two-way travel for the W4 bus service in the future. Although there is a slight bottleneck in the available highway width on Willan Road (5.8 metres wide rather than the 6 metre width requested) TfL do not object to the road layout in principle. The widened highway in this area would result in the loss of a small number of on-street parking spaces. These spaces would be re-provided within the parking capacity of the existing estate, as described below. The net impact of the proposed development upon the local public transport networks is predicted to be low due to the relatively small net increase in homes from this proposal.

Car Parking

- 6.179 A parking stress survey was carried out in 2020 across the whole estate which identified that there is significant spare parking capacity both on street (public and private roads alike) and in undercroft parking areas, with a total of 405 available spaces available. A telephone survey of existing residents undertaken in 2021 identified that occupiers of one-bedroom dwellings had a car parking demand ratio of 0.33 spaces per dwelling, whilst dwellings with two or more bedrooms had a car parking demand of 0.89 spaces per dwelling. As such, the estimated total car parking demand of the proposed 294 dwellings would be 217 spaces.
- 6.180 91 of the anticipated 217 spaces required for this development would be provided within the application site boundary. The remaining 126 spaces would be accommodated in other parts of the estate where the results of the parking stress survey indicate that there is ample spare capacity within the existing spare 405 spaces. Parking demand would be kept low through the provision of sustainable

transport methodologies including a parking management plan, travel plans and high-quality cycle parking.

- 6.181 Wheelchair-accessible car parking would be provided in line with the London Plan standards, namely for 3% of dwellings from the outset (9 spaces). Provision for up to an additional 7% of dwellings (21 spaces) would be provided as and when required based on demand, by converting other spaces either within the application site or the wider estate. There is more than sufficient capacity to afford a further loss of parking spaces as a result of such conversions.
- 6.182 In accordance with London Plan requirements active electric vehicle charging infrastructure would be provided for 20% of spaces from the outset, whilst the remainder would be fitted with passive infrastructure. This would be secured by condition.

Cycle Parking

- 6.183 Cycle parking would be provided in the form of 660 cycle parking spaces which is in line with the London Plan minimum cycle parking standards and in accordance with the London Cycling Design Standards. A minimum of 5% of all long-stay cycle parking would be in the form of stands for larger cycles. 14% of all long-stay spaces would be in the form of regular 'Sheffield' stands. The remainder would consist of two-tier racks (44%) and spaces in dwellings (37%). Spaces have been provided within the new homes in response to feedback from residents and concerns about security within shared cycle stores and public areas within the estate. This arrangement has the additional benefit of freeing up space at ground floor level to provide a greater proportion of active frontages and the perception of safety on the estate. At least one lift per residential core would be large enough to fit a cycle within it.
- 6.184 The proposed non-residential cycle parking has also been designed to meet London Plan standards and exceeds the minimum requirements. The detailed design of the long-stay and short-stay cycle parking and access arrangements would be secured by planning condition. This would involve the provision of full details showing the parking systems to be used, access to them, the layout and space around the cycle parking spaces with all dimensions marked up on plans.

Deliveries and Servicing

- 6.185 Delivery and servicing activity would continue to be provided on the streets within the estate. Two dedicated loading bays would be provided, one on each of Willan Road and Adams Road. Swept path analysis shows that a 10-metre rigid vehicle, a waste collection vehicle and a fire tender vehicle would be able to adequately manoeuvre within the internal streets and would benefit from appropriate visibility at road junctions and bends. The Council's Waste Management Officer has raised no objections to the delivery arrangements as proposed.

Construction Traffic

- 6.186 The Transport Assessment submitted with the application includes a draft construction logistics plan. There would be a peak level of 25-40 deliveries a day to the site. Construction vehicles would access the site via a one-way system from Lordship Lane to the north, with some traffic using The Avenue, and exiting the site from the south via Gloucester Road. This would be compatible with the trial low traffic neighbourhood in

place. Secure gates will be installed to construction compounds and wheel-washing facilities used to ensure a clean neighbourhood. A vehicle booking system would be used to ensure deliveries are effectively managed. The exact details of the construction methodology and programme would be secured through a condition.

Summary

- 6.187 There is ample parking capacity within the estate to accommodate any potential overspill parking demand from this development, the low number of additional trips expected from the development would be accommodated on the local road network, and the development would be supported by the provision of high-quality cycle parking that would meet the requirements of the London Plan. The Council's Transportation Officer and Transport for London have assessed this application and raise no objections subject to conditions and planning obligations.
- 6.188 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.

Open Space, Trees and Urban Greening

Open Space

- 6.189 Policy G4 of the London Plan states that there should be no loss of open space and where possible new areas of public open space should be created. Policy DM20 of the Development Management DPD states that development that protects and enhances open spaces will be supported. It also states that the reconfiguration of open space will be supported where it is part of a comprehensive scheme, where there is no net loss of open space, where it would achieve enhancements to address deficiencies in the capacity, quality and accessibility of the open space, where it would secure a viable future for the open space, and where its environmental function would not be compromised.
- 6.190 The proposals would increase the amount of open and green space within the application site boundary by reconfiguring the layout of built form within it. The amenity space within the existing Memorial Gardens, which is an underused and poorly overlooked area to the south of the existing Tangmere block, would be relocated into the centre of the site which enables greater public use. Other open space areas, including the civic squares and shared internal courtyards, would form part of a wider range of public realm improvements on the site which have been designed to significantly increase public access and activity within public areas within the estate.
- 6.191 In terms of open space quantum, there is a net increase in open and green space within the estate as part of this proposal, from an existing 9,715sqm to the proposed 12,404sqm; an overall increase of 2,689sqm (a 28% increase), excluding pedestrian pathways.



Existing Open Space Quantum:	
■ Pedestrian	4183m ²
■ Squares	1757m ²
■ Courtyards	4457m ²
■ Parks	2801m ²
■ School Playground	700m ²

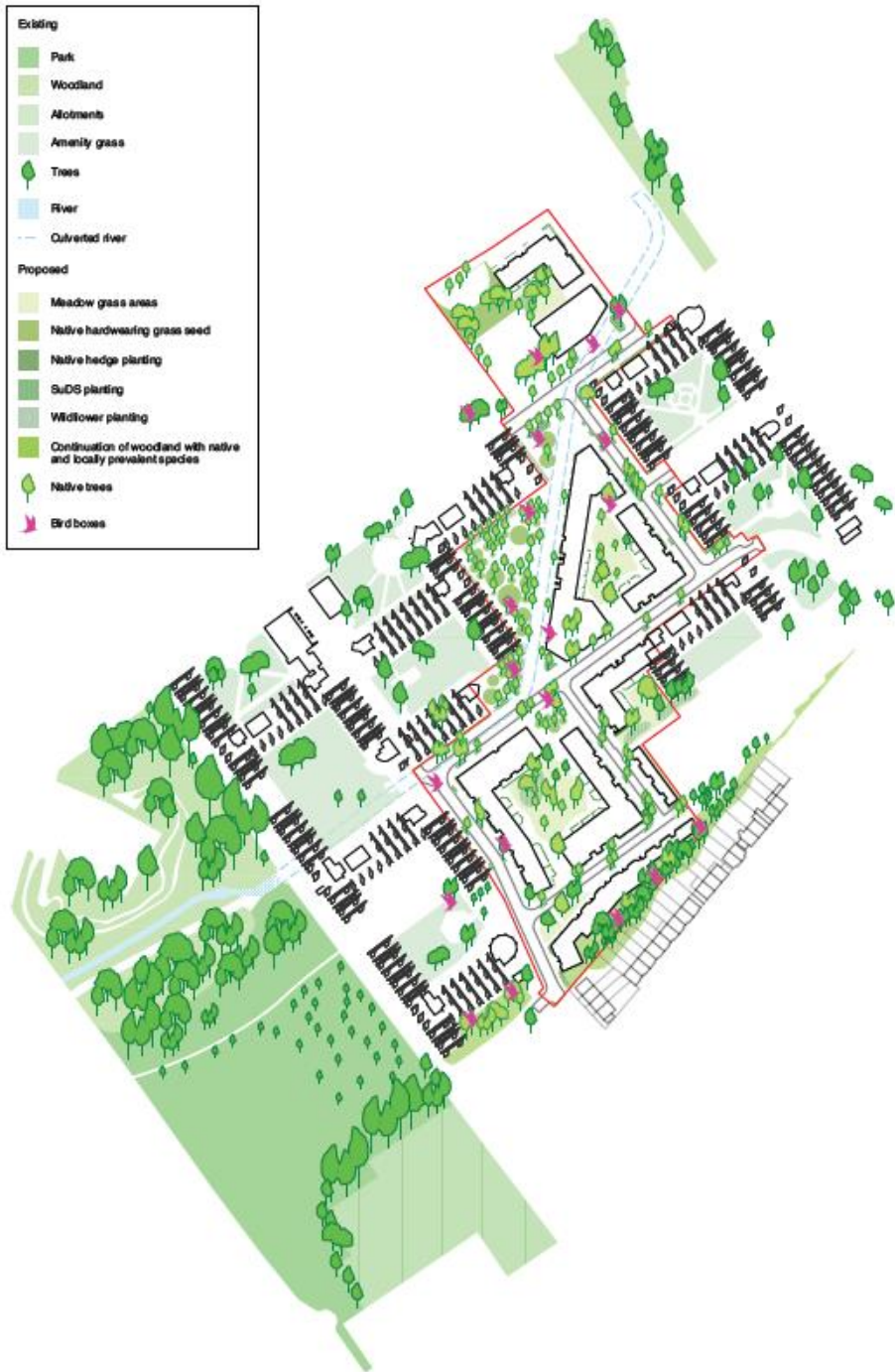
Proposed Open Space Quantum:	
■ Pedestrian	4367m ²
■ Squares	3008m ²
■ Courtyards	4822m ²
■ Parks	3574m ²
■ School Playground	1000m ²

Trees

6.192 London Plan Policy G7 requires existing trees of value to be retained, and any removal to be compensated by adequate replacements. This policy further sets out that planting of new trees, especially those with large canopies, should be included within development proposals.

6.193 Policy DM1 of the DM DPD requires proposals to demonstrate how landscaping and planting are integrated into a development, whilst responding to trees on and close to the site.

6.194 There are no trees within or adjacent to the site that are subject to formal protection through a tree preservation order. Trees within and adjacent to the site have been surveyed and of these trees only one was attributed to have Category A status. This tree is located to the north of Lypne block and would not be affected by the development proposals. As many trees as possible would be retained through the development process and trees close to the new buildings would be suitably protected. The existing woodland areas to the south of the site would also be protected. A substantial number of new trees would be planted throughout the proposed development. Any trees lost would be replaced with new trees at a ratio of at least 3.5 new trees for every single tree lost. Over 200 new trees would be provided with a range of native species to be planted.



6.195 The Council's Tree Officer has confirmed that this approach is acceptable subject to conditions that ensures both the protection of trees to be retained and ensures that new tree planting would replace the existing tree canopy cover on site.

Urban Greening Factor

6.196 Policy G5 of the London Plan 2021 requires major development proposals to contribute to the greening of London by including urban greening as a fundamental element of site and building design. Predominantly residential development should have an urban greening factor of 0.4.

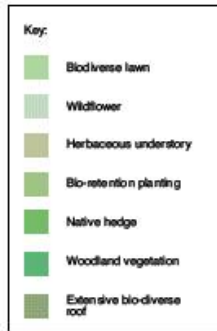
6.197 Local Plan Policy SP11 promotes high quality landscaping on and off-site and Policy SP13 seeks to protect and improve open space.

6.198 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.

6.199 As described above the proposed development would increase the amount of open and green space on site through the provision of a large central park and publicly accessible courtyards. These spaces would be heavily planted which increases the amount of greenery within the site area. The proposed street layout would also include significant areas of tree planting and other amenity vegetation. Green roofs, flower planting and permeable paving would further increase the urban greening factor for the development to a level of 0.4, which is compliant with policy as described above. This urban greening level would be secured by condition.

6.200 The sunlight amenity analysis undertaken with the Daylight, Sunlight and Overshadowing Report also shows that the level of sunlight to all amenity spaces would either meet or come very close to the target values as set by the BRE. 83% of the amenity space would have at least two hours of sunlight on the date on March 21st (as required by the guidance), which is significantly above the 50% target. Therefore, the amenity areas would have a very good sunlight quality overall.

6.201 As such, the development would provide substantial improvements to the soft landscaping on-site and an acceptable level of urban greening. The details of this landscaping provision can be secured by condition to secure a high-quality scheme with effective long-term management.



Ecology and Biodiversity

6.202 Policy G6 of the London Plan 2021 states that developments should aim to secure biodiversity net gain. Policy SP13 seeks to protect and improve open space and providing opportunities for biodiversity and nature conservation. Policy DM21 expects proposals to maximise opportunities to enhance biodiversity on-site.

6.203 The existing site is mostly covered by buildings, hardstanding and lawn areas of low biodiversity value. This would be replaced by a wider range and area of landscaping which has been designed to maximise areas of biodiversity. Bat and bird boxes would be installed. Green roofs are proposed and planting would be of native species where appropriate. With the planned landscaping proposals the biodiversity levels on-site show a net gain of 128.87%, which is a substantial increase. Natural England has not objected to this application. As such, the biodiversity on the site would increase as the result of the proposed development and this net gain will be secured through condition.

- 6.204 The Preliminary Roost Assessment submitted with the application identified the existing site as having the potential to support bats. Both Tangmere and Northolt buildings showed a low potential to support bats, whilst other buildings and trees on site were noted to have a negligible potential to support bats. Further surveys to Tangmere and Northolt showed no evidence of bats. Sensitive lighting and native planting would be provided to enhance the local environment for bats. These measures can be secured by condition.
- 6.205 It is understood that peregrine falcons have been observed on site. These birds are a protected species. The applicant has taken advice from an ecologist on this matter. Further survey work to assess the location of the birds' nests must occur before demolition of any buildings on site. This survey work must also take place during the bird nesting season (March to August). These surveys and their timing prior to demolition can be secured by condition and any remedial measures also secured following these surveys.
- 6.206 Subject to these conditions the application is acceptable in terms of its impact on trees, ecology and biodiversity, and its provision of urban greening.

Carbon Reduction and Sustainability

- 6.207 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.
- 6.208 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.
- 6.209 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.
- 6.210 The proposed development has sought to adopt a progressive approach in relation to sustainability and energy to ensure that the most viable and effective solution is delivered to minimise carbon emissions.

Carbon Reduction

- 6.211 Policy SP4 of the Local Plan Strategic Policies, requires all new development to be zero carbon. The London Plan 2021 further confirms this in Policy SI2. The applicant has submitted an *Energy Statement* with the application.

Reduced Energy Use (Be Lean)

- 6.212 The buildings would adopt a series of passive and active design measures to use less energy including high performance glazing, heat recovery ventilation methodologies, high building air-tightness, high levels of natural lighting and use of low-energy lighting where needed.

Efficient Energy Supply (Be Clean)

6.213 The development is expected to connect to a district heating network. However, details of the undertaking of this network are not yet known. As a temporary measure until further details of the district heating network are fully understood, the residential part of the development would be served by a heat network incorporating low-carbon heat generation through the installation of air source heat pumps and high-efficiency gas boilers. The energy generated by this site-wide network would provide low carbon energy to other parts of the estate. The commercial units would be served by standalone air source heat pumps. This scenario allows low carbon heat generation to be maximised whilst allowing maximum flexibility for the development to connect to the district heat network once this becomes available.

Use of Renewable Energy (Be Green)

6.214 As mentioned above the development would be served by air source heat pumps. In addition, renewable energy would be provided through photovoltaic panels.

Summary

6.215 Overall, the carbon savings from the proposed development as provided through the methodologies above would represent a guaranteed minimum 65.4% improvement on the carbon baseline (2013 Building Regulations) for both the residential and non-residential uses. This means that the maximum carbon contribution would be 4,006.6 tCO₂ for 30 years (£380,000). Further carbon studies would take place prior to commencement of the development to ascertain the final carbon reduction strategy and offset figure. It is expected that ultimately, once the new energy centre is completed and the development connects to the district energy network, the development would be carbon negative and a contribution thus would not be required.

6.216 The development would also incorporate monitoring equipment to reduce energy use and display real-time energy data. This will be secured by condition.

Circular Economy and Whole Life Carbon

6.217 The scheme seeks to ensure that material and resource use is minimised as far as possible. Waste would be eliminated where possible and managed in a sustainable way. The development is expected to reduce its whole life carbon significantly by partially using alternative construction materials instead of concrete and through installing aluminium-timber hybrid windows.

6.218 *Overheating*

6.219 Passive and active overheating measures have been incorporated into the development proposal. Internal heat levels would be minimised through efficient home layouts and maximised ventilation. Some mechanical ventilation would be required. Detailed modelling of overheating would be secured by condition.

6.220 *Summary*

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

Waterways and Flood Risk

6.222 Policy DM28 of the Development Management DPD states that new development must be set back from any nearby watercourse at a distance as agreed with the Environment Agency. It also states that major developments must investigate the potential for de-culverting of the watercourse where possible. Local Plan Policy SP5 and Policy DM24 of the Development Management DPD seek to ensure that new development reduces the risk of flooding and provides suitable measures for drainage. Policy DM26 states that new development within Critical Drainage Areas will be required to incorporate measures to reduce overall flood risk.

Moselle Brook

6.223 The Moselle Brook (part of the London-wide Blue Ribbon network) runs in a culvert below the application site. It runs from east to west under the existing enterprise centre, energy centre and Northolt block. The culvert has been surveyed and is in a reasonable condition. The Design and Access Statement has considered the possibility of de-culverting this watercourse in line with Policy DM28. The water quality within the river is considered to be poor and could bring a health and safety risk to residents in the estate. De-culverting the river either as an open channel or partially naturalised would significantly reduce the quality and quantum of public open space within the development area and would reduce the width and directness of the new pedestrian and cycle route through the estate. There is also a risk of anti-social behaviour, whilst the additional safety measures associated with an open waterway within the estate would prove expensive to achieve and maintain.

6.224 The development proposal would instead leave the area above the culvert undeveloped to allow it to be de-culverted if there was wider community support for this option in the future. The presence of an underground waterway below the surface of the new diagonal route would be identifiable through surface level water features and grilles. The Urban Design Framework submitted with the application has also shown that a de-culverted river could potentially be provided along Brookside, to the north-west of the application site, where its siting would not compromise site connectivity or levels of open space. The Environment Agency has not objected to this development proposal subject to conditions that secure appropriate surveys of the culvert both before and after development works.

Flooding and Drainage

6.225 A Flood Risk Assessment (FRA) has been submitted with the application. This document notes that site is located within Flood Zone 1 which has the lowest risk of flooding. Flood risk at the site is generally low though there is a higher risk of surface water flooding in some areas. The development is supported by a comprehensive sustainable drainage strategy which includes a range of methods to reduce surface water at the site and slow down movement to reduce the associated flood risk, including providing significant amounts of new soft landscaping (including rain gardens and green roofs), comprehensive use of permeable paving and the installation of below ground water attenuation tanks. The Council's Flood and Water Management team has raised no objection to these proposals. Final details of the site drainage systems and how surface water run-off rates would be maximised would be secured by condition.

- 6.226 Thames Water have raised no objections to the development subject to conditions.
- 6.227 Therefore, the development is acceptable in terms of its impact and response to the culverted waterway and its reduction in flood risk at the site.

Land Contamination

- 6.228 DPD Policy DM23 requires proposals to demonstrate that any risks associated with land contamination can be adequately addressed to make the development safe.
- 6.229 A Ground Conditions Report has been submitted with this application. The report states that there are no significant risks of contamination at the site. Soil sampling has identified limited concentrations of metals and hydrocarbons but the new development would appropriately mitigate against these contaminants. The Council's Pollution Officer has reviewed the submitted documentation and has raised no objections to the proposal in terms of its land contamination risk, subject to conditions.
- 6.230 Therefore, the application is considered acceptable in terms of its land contamination risks.

Fire Safety

- 6.231 In 2021 the Government introduced Planning Gateway One (PG1) for all 'relevant' developments i.e. those that contain two or more dwellings and which are 18 metres (or seven storeys) or greater in height. PG1 requires a fire statement to be submitted with planning applications for these relevant developments and also establishes the Health and Safety Executive as a statutory consultee for relevant development.
- 6.232 The Government has also recently announced, via the publication of a circular letter, that for 'very tall' residential buildings, robust fire safety provisions must be put in place, and a detailed fire engineering analysis undertaken.
- 6.233 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.
- 6.234 An Outline Fire Strategy Report and a Fire Statement were submitted with the application. The Outline Fire Strategy states that the development would meet fire safety requirements of Building Regulations Approved Document B. Sprinklers would be provided throughout the development including in residential areas and in some non-residential areas. All units would be located close to fire hydrants, some of which would be newly installed.
- 6.235 The Health and Safety Executive (HSE) have been consulted on this application. HSE retain some concerns about the vulnerability of single staircases, the provision of external staircases and firefighter travel distances. The Council's Head of Building Control has reviewed this application and states that, in respect of fire safety, the proposed fire engineered solution as currently designed is achievable and will be checked in full detail at the Building Regulations stage. Design changes will be required if the fire safety of the development does not meet the required regulations in Approved Document B.

6.236 The Greater London Authority has raised no objections in terms of fire safety.

6.237 Further details on fire safety would be developed as the design of the building progresses. It is considered that the buildings proposed within this development proposal do not fall within the definition of 'very tall' for the purposes of this circular (and Building Regulations more generally). A detailed fire statement including an appropriate fire engineering analysis would be secured by condition which would ensure compliance with the London Plan.

6.238 As such, the application is acceptable in respect of its fire safety, subject to conditions.

Equalities

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

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

6.240 The three parts of the duty apply to the following protected characteristics: age, disability, gender reassignment, pregnancy/maternity, race, religion/faith, sex and sexual orientation. Marriage and civil partnership status applies to the first part of the duty. Members must have regard to these duties in taking a decision on this application.

6.241 Although it is not enforced in legislation as a protected characteristic, Haringey Council treats socioeconomic status as a local protected characteristic. Regard must be had to these duties in taking a decision on this application.

6.242 The development has been submitted following a ballot of eligible residents on the estate. The result was announced on 8th March 2022. On a turnout of 55% of eligible voters, 85% supported the proposal.

6.243 An *Equality Impact Assessment* (EqIA) has been provided with this application. The EqIA identifies that a range of both positive, negative and neutral impacts would be experienced by those with protected characteristics on the estate. The proposed development is anticipated to lead to positive equalities impacts by advancing equality of opportunity through a fairer, more equal estate with more opportunities, better housing, improved public, green and open spaces and a safer environment for residents and visitors. Where negative impacts have been identified these can be appropriate mitigated to ensure that disproportionate impacts are either avoided or minimised.

6.244 To summarise, the EqIA anticipates that the overall equalities impact of the proposal would be positive. Officers concur with the findings of the EqIA and therefore it is considered that the development can be supported from an equalities standpoint.

Conclusion

- 6.245 The development would deliver much-needed new homes for Council rent, including a large proportion of family homes, and would replace buildings where demolition is urgently required for safety reasons.
- 6.246 The development would provide a 'right to return' for existing residents and a 'fair deal' for leaseholders and follows the aims and objectives of the Mayor of London's Good Practice Guide to Estate Regeneration.
- 6.247 The development would deliver on the aspirations of Site Allocation SA61 by providing improvements to the quality of homes within the Broadwater Farm Estate, and by providing improvements to the overall design and pedestrian/cycle connectivity within and through the Estate. The provision of an Urban Design Framework ensures that the development would meet the masterplanning requirements of SA61.
- 6.248 The development would re-provide existing non-residential uses, including new retail facilities to support the existing and new residential community, and would provide new local employment opportunities.
- 6.249 The development would be of a high-quality design which responds appropriately to the local context, and which has been designed through consultation with the local community. The development is supported by the Council's Quality Review Panel.
- 6.250 The proposed removal, refurbishment and re-erection of the Grade II listed mural on Tangmere would result in heritage benefits from the development resulting from the restoration of the mural and its relocation to a more visually prominent location.
- 6.251 The development would provide high-quality residential accommodation of an appropriate size and mix within an enhanced public realm environment including new streets and a new park in the heart of the estate. The increased public activity and natural surveillance would significantly improve safety and security on the estate.
- 6.252 The development has been designed to avoid any material adverse impacts on the amenity of nearby residential occupiers in terms of loss of sunlight and daylight, outlook or privacy, excessive noise, light or air pollution. There would also be no negative impact on the local wind microclimate.
- 6.253 The development would provide 91 car parking spaces within the site and additional parking spaces would be available within the wider estate, this is sufficient to support the parking requirements of residents within the new homes.
- 6.254 The proposal includes car parking for occupiers of the proposed 10% wheelchair accessible dwellings and high-quality cycle parking.
- 6.255 The development has been designed to achieve a significant reduction in carbon emissions, would improve the sustainability of the wider estate and would connect to the district heating network if a connection becomes available in the future. The development would achieve a suitable urban greening factor and substantial improvements in biodiversity whilst also protecting and enhancing local ecology.
- 6.256 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 As an application for 100% Council Rented housing the development is not liable to pay the community infrastructure levy (CIL) for these homes (once social housing relief has been sought and approved prior to commencement of the development).
- 7.1.2 In respect of the proposed non-residential development, Haringey charges CIL for supermarkets only (i.e. the retail unit). The Mayor of London charges CIL for all non-residential development that is neither education nor healthcare related (i.e. the retail unit and enterprise centre). As such, based on the information provided with the application the Mayoral CIL charge will be £61,325.76 (1,016sqm x £60.36) and the Haringey CIL charge will be £50,280.57 (381sqm x £131.97).
- 7.1.3 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. An informative will be attached advising the applicant of this charge.

8. RECOMMENDATION

GRANT PERMISSION and GRANT LISTED BUILDING CONTENT subject to conditions in Appendix 1

Registered No. HGY/2022/0823 and 2816