

Planning Sub Committee 6th November 2025

ADDENDUM REPORT

UPDATE FOR CONSIDERATION AT PLANNING SUB-COMMITTEE Item No. 8

Reference Nos: HGY/2025/1220	Ward: Highgate
Address: Depot, 505-511 Archway Road, Hornsey, London, N6 4HX	
Proposal: Redevelopment of existing car wash site to provide 16 new council homes comprising a 4-storey building fronting Archway Road and two 2-storey houses fronting Baker's Lane, with associated refuse/recycling stores, cycle stores, service space, amenity space and landscaping.	
Applicant: Haringey Council	

Additional representations from No. 106 North Hill

Since publication of the Committee Report, a number of additional documents, twelve to date, titled "Addendum to Objection from Brendon Marczan – (Title..)" have been received and uploaded to the Planning Register. These documents have been reviewed for the purpose of identifying additional material points and where it is considered necessary to provide further commentary beyond what is already set out in the Committee Report, comments are provided in the table below.

	Objection	Comment
1.	Haringey Council has not contacted any other affected residents to verify property layouts or ensure objections are accurately reflected.	Adjoining properties were consulted on the Revised Daylight & Sunlight Assessment 17.10.25 which provided explanatory commentary on the modelling inputs and data sources used to inform results in the Daylight & Sunlight Assessment as initially submitted, allowing parties to make comments.
2.	Revised Daylight & Sunlight Assessment does not take account of extension approved at No 108 North Hill.	In respect of No. 108, the BRE Guidance (Site Layout Planning for Daylight and Sunlight – A Guide to Good Practice, 3rd Edition, 2022) recommends assessing impacts based on the existing built environment. The consultants have provided additional analysis addressing the potential impact on

		associated windows. This has been uploaded to the Planning Portal and is commented on below.
3.	Reliability of the daylight and sunlight assessment further questioned, citing outdated plans, lack of property access, and use of unverified estate agent drawings	As already referenced on page 25, for the purpose of preparing daylight and sunlight assessments, it is not generally required to access the interior of individual properties. Where internal layouts are unavailable, the consultants can make reasonable assumptions based on publicly available information, in accordance with BRE Guidance (2022) and RICS "Surveying Safely" protocols. These methodologies are standard practice and ensure assessments can be undertaken safely and proportionately, particularly where access is not feasible or has not been granted. Notably, no specific commentary, interior photographs, or updated layout sketches were provided by the LPA to question the assumed internal arrangements used in respect of No 106.
4.	Insufficient consultation extension in relation to revised Daylight and Sunlight Assessment	The revised Daylight and Sunlight Assessment did not alter the scope, methodology, or technical findings of the original report, rather, it provided additional explanatory commentary on how the analysis was carried out and the information used to inform the assessment. As noted in the statement attached to the planning portal, no new data or conclusions were introduced and as such, the period of additional consultation is considered proportionate and reasonable.
5.	Council continues to permit its external consultants to refine and update technical statements and supporting documentation outside formal consultation periods, while simultaneously placing	It is not uncommon for additional information to be provided during the assessment of a planning application, particularly where it serves to clarify technical matters or respond to representations received. Planning legislation does not prevent

	constraints on residents and community groups.	this, and where such information has been submitted parties have been notified as/when appropriate.
6.	The document titled “Note on Revised Daylight & Sunlight Assessment 17.10.25.pdf” is not a formal technical report and therefore cannot be relied upon as part of the application. It lacks the necessary technical detail and rigour to support the conclusions drawn in the updated Daylight and Sunlight Assessment.	The document titled “Note on Revised Daylight & Sunlight Assessment 17.10.25.pdf” is not intended to serve as formal technical documentation. Rather, it has been provided as a supplementary note to aid understanding of the purpose and scope of the updated Daylight and Sunlight Assessment and therefore does not require presentation on formal letterhead.
7.	Daylight and sunlight assessment be re-run using up-to-date floorplans by a wholly independent team with no prior involvement, excluding any officers or consultants previously associated with the scheme, to ensure impartiality and restore public confidence.	As set out on page 26, paragraph 13 of the Committee Report, Officers possess the necessary expertise to assess daylight, sunlight, and privacy impacts in line with planning guidance, and there is no formal requirement for an independent third-party review. The submitted assessment has been internally reviewed, with further clarification sought during the process, and its conclusions are considered robust for determining this application.
8.	Requests a full audit trail of all objections, correspondence, and internal council communications relating to daylight and sunlight impacts, including evidence of how residents’ concerns were shared with external consultants and addressed during the assessment process.	The Committee Report serves as the formal record of officers’ views on the planning merits of the proposal. It summarises the representations received and sets out the relevant assessment and recommendations made in accordance with planning policy and guidance. Where additional information relating to daylight and sunlight has been provided, this has been brought to the attention of adjoining occupiers as/when appropriate. A site visit to No. 106 (the property to which this specific objection is attributed) was offered but not taken up.
9.	Objection states that only the Highgate Society were notified in advance of the 6 November	As set out on the Council’s website, Haringey Council notifies residents who have submitted comments on a

	Planning Sub-Committee meeting with individual residents who made formal representations were not informed.	planning application five working days before the relevant Planning Sub-Committee meeting. During a pre-arranged meeting with the Highgate Society on 24/10/25 arranged to discuss a range of applications, this item was raised, and the Society queried when it was likely to be considered by committee. Officers indicated that it was expected to go to committee in November, subject to finalisation of the item. This did not constitute formal notification, which was issued in accordance with the Council's standard procedures.
10.	Council has continued to meet with selected community groups and to arrange informal visits with individuals.	It is common for Officers to meet community groups and equally Officers can often arrange a site visit to an individuals'/objectors' property when requested. As already reflected above a visit to No. 106 was offered but not taken up.
11.	The objector submits a civil-law notice claiming that the proposed development would infringe long-established rights to light at No. 106 North Hill under the Prescription Act 1832. They state the property has been a private residence for over 150 years, with first-floor windows in unchanged historic positions, and offer to provide supporting evidence or resident testimony to substantiate the claim.	The Committee Report already provides commentary on the windows assessed, including the associated impacts on daylight and sunlight taking account of BRE guidance and policy with commentary as to why non-habitable rooms such as bathrooms are not subject to assessment. As also noted in Page 30, point 20 of the report, it is acknowledged that the granting of planning permission does not override private property rights, including any established Right to Light with it explained that this is a separate matter governed by civil/case law, which may be pursued independently through the courts, as such being separate to planning.
12.	Objection questioned the consultation process, mapping properties visited on 5 June 2025. The map indicated that Nos. 102, 104, and 106 were	The objection questions the consultation process, referencing a map of properties visited on 5 June 2025. The map indicates that Nos. 102, 104, and 106 were consulted,

	consulted, while the remainder up to No. 113 were either marked as having not received written notification or contact could not be made.	while the remainder were marked as either not having received written notification or as properties where contact could not be made. Officers note that this map was submitted on 28 October 2025, despite the visits being stated to have occurred on 5 June. The reliability of this evidence is questioned, given that the Council's established systems and procedures for issuing consultation letters are considered robust. In response to complaints received from the objector in July and August, officers explained how the consultation letters were issued, namely consultation letters are printed by Govmail, a well-established UK postal service provider who work Whistl, which handles initial sorting and delivery, before Royal Mail completes final delivery to individual addresses. To address this matter, offices reviewed records, and it was confirmed the letters were issued. While the addresses of the properties visited were not initially shared with officers as part of the complaint process, the complainant was invited to provide this information, however did not. The details were only later submitted via the Planning Portal on 28/10/25 in the document titled Addendum to Objection from Brendon Marczan: Consultation Map and Notification Audit – Evidence of Procedural Defect. Based on the map provided, it is noted that responses have been received from 98, 100, and 213 North Hill, as well as 473 and 497 Archway Road, properties identified as not being consulted. It is also noted that, in addition to letter-based consultation, the application was publicised through
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		multiple site notices displayed in the vicinity of the site, in accordance with statutory requirements.
13	Objection states Committee report contradicts the comments provided in the complaint response regarding the number of parties consulted on the planning application (333 vs 113).	As per page 23, the Committee Report correctly references 113 parties consulted. The figure of 333 stems from the Statement of Community Involvement, which outlines that, as part of the community engagement exercise, letters were distributed to 333 local addresses around the site. A complaint response made reference to 113 – “For this application 113 properties were notified” with a further complaint response explaining the reference to 333 letters – “Specifically, and as documented on the planning register, I can confirm that the applicant undertook engagement with residents, ward councillors, and community stakeholders from 2022 onward. This involved distributing letters to 333 nearby homes, providing online and paper feedback channels, and holding both online and in-person conversations with residents and local groups.”
14.	Objection argues that the Council adopted an arbitrary approach to notifying affected residents and stakeholders, highlighting that Highgate Primary School, located within 100 metres of the site, was not consulted. They contend that this omission, given the school’s likely exposure to traffic, safety, and infrastructure impacts, may breach planning policy and the Council’s Statement of Community Involvement. It is also claimed that neighbour notifications were applied inconsistently, with some properties up to 173	This is a modest development comprising 16 homes, the majority of which are not family-sized. The consultation undertaken was proportionate to the scale of the proposal, focusing on properties in the immediate vicinity and those within close direct line-of-sight to the site. The development is located at a sufficient distance from Highgate Primary School such that construction activity is not expected to affect its day-to-day operations. Furthermore, planning conditions have been imposed to manage and mitigate any associated construction impacts, ensuring appropriate

	metres away notified, while others closer or with direct line-of-sight were excluded. The objector asserts that the consultation contravenes Regulation 15(5) of the Development Management Procedure Order 2015 and fails to meet legal standards of fairness and consistency.	safeguards are in place throughout the build period.
15.	Council's failure to publish the required statutory notice in a local newspaper as mandated by Article 15(4) of the DMPO 2015. Instead, the Council relied solely on the "Public Notice Portal," which is not a recognised newspaper and is not widely accessed by residents. No evidence has been provided that any established local newspaper published the notice, undermining transparency and excluding digitally limited residents from the consultation process.	While Article 15(4) of the DMPO 2015 requires publication in "a local newspaper circulating in the locality," it does not specify whether this must be in print or digital form. In Haringey, the Ham & High is not used due to its very limited coverage of the borough with currently there being only two local newspapers actively circulated: Haringey Community Press, an online-only independent outlet, and the Haringey Independent, which operates as an e-edition. Both are accessible and locally focused, with Haringey Community Press covering Tottenham, Crouch End, Hornsey, Muswell Hill and Wood Green, and hold membership in both the Independent Community News Network (ICNN) and the Independent Press Standards Organisation (IPSO). For such specific reasons the publication of this application in the digital copy of Haringey Community Press is viewed acceptable.
16.	Late and unnotified upload of the Director's Letter in relation to the planning application prior to determination is argued to contain material planning obligations, thereby breaching consultation requirements and undermining the need for transparency.	The Director's Letter is a draft legal document setting out the planning obligations linked to the planning application, in the event it is approved by the Committee. It is not subject to separate statutory consultation and rather comments on proposed obligations can be made as part of consultation on the planning application itself. The document has been published to support transparency and inform the

		public, as it relates directly to the Committee Report which outlines the different planning obligations to be secured in the event that planning permission is given.
17.	Children's play-space provision is argued to be inadequate, with insufficient on-site space, no identified off-site contributions, with the nearest playground located over 400 m away.	The objection regarding children's play-space is noted, however noting what is outlined in the Committee Report (paras. 6.82–6.84), it is not clear how the provision is inadequate, nor why a distance of 400 m to the nearest playground is implied to be unacceptable. The scheme exceeds the required 126.5 sqm of play space, providing 167 sqm within a landscaped communal garden equipped for young and pre-teenage children.
18.	Accuracy of the Urban Greening Factor (UGF) is questioned highlighting unverified claims and physical constraints that make elements undeliverable, such as tree planting on private land and a modular green wall requiring third-party consent. It is argued that the UGF falls below the London Plan minimum and breaches policy and in turn there needs to be a revised UGF plan submitted.	The objection regarding the accuracy of the Urban Greening Factor (UGF) is not clearly substantiated. A detailed indicative landscaping plan has been submitted, and when compared to the site's current predominantly hard-surfaced condition, the scheme introduces a meaningful area of soft landscaping and tree planting. These measures and others contribute to a UGF score of 0.40, which has been objectively calculated. All proposed greening features will be delivered within the application site, with larger trees positioned away from the boundary with North Hill properties.
19.	Air pollution concerns with no baseline or mitigation provided with residents at risk of NO ₂ /PM _{2.5} exceedance.	The objection regarding air pollution is noted. An Air Quality Assessment was submitted with the application and concluded that predicted NO ₂ levels are within legal limits, specifically pollutant levels, including NO ₂ , PM ₁₀ , and PM _{2.5} , which would be below Air Quality Objective (AQO) thresholds. The assessment was informed by the borough-wide Air Quality Management Area (AQMA) designation and reviewed by the

		Council's Pollution Team. Mitigation measures are incorporated into the design of the scheme, including the use of Mechanical Ventilation with Heat Recovery (MVHR) systems fitted with F7 filters.
20.	Flood Risk Assessment and Drainage Strategy fail to verify key technical elements including hydraulic modelling, climate change sensitivity, and downstream flow, breaching local standards. The Drainage and SuDS proposals lack evidence of compliance with surface water management requirements and do not include a secured maintenance or adoption plan, undermining long-term accountability.	The objection is noted, but the concerns raised are not substantiated by the evidence submitted. As set out in paragraphs 6.174 to 6.183 of the Committee Report, the site lies entirely within Flood Zone 1 and is at low risk of surface water flooding, as confirmed by the Environment Agency. A Flood Risk Assessment and Drainage Strategy has been submitted, including hydraulic modelling and a restricted discharge rate of 2.0 l/s, which Thames Water has accepted. Attenuation tanks and SuDS measures are proposed, and a Drainage Management Strategy and Maintenance Regime have been included and will be secured by condition. The strategy has been reviewed by technical officers and is considered compliant with national and local policy.
21.	Roof terrace lighting predicted to exceed horizontal illuminance limits, disturbing residents' sleep.	Concerns about roof terrace lighting are noted however detailed lighting design has not yet been finalised and will be developed during the detailed design stage as outlined by the architect, who has also advised that lighting will be reviewed in line with "Secured by Design" requirements, and fittings can be selected or omitted to avoid impact on neighbouring properties. A condition is recommended below.
22.	Noise exceeds WHO night-noise limits; impacts sleep and wellbeing. Ventilation noise conflicts: open-window reliance exposes residents to excessive traffic noise.	The objection lacks specific commentary explaining how a development of 16 homes would exceed WHO night-noise limits or demonstrably impact sleep and wellbeing. As confirmed in the Noise

		Assessment (page 31, para. 31), reviewed by the Council's Pollution Officer, the proposed building will incorporate high-performance glazing and mechanical ventilation to mitigate external noise. The scheme replaces a car wash use, which generated operational noise, with residential accommodation, likely resulting in an overall reduction in noise levels. The building will be constructed to a high standard, including appropriate insulation measures to further minimise noise transmission.
23.	Overheating - the development fails the CIBSE TM59 overheating standard, with bedrooms exceeding night-time comfort thresholds during extreme summer conditions, even with windows open; the energy strategy predicts excessive CO₂ emissions, and the on-site energy reduction falls below the 35% target over Part L 2021, demonstrating non-compliance with policy requirements.	The Climate Change Officer has reaffirmed that the Dynamic thermal modelling in line with CIBSE TM59 shows compliance for DSY1 2020s using passive measures (low g-value glazing, external shading), MVHR with summer bypass and mechanical cooling in accordance with the cooling hierarchy. He also confirms that GLA Energy Assessment guidance (2022) expects compliance for DSY1, while DSY2 and DSY3 are acknowledged as challenging. The applicant has shown overheating risk is reduced as far as practical and all passive measures explored, achieving compliance for DSY1 and DSY2 criteria.
24.	Development breaches London Plan transport policies by failing to meet car parking standards (T6), lacking adequate on-street parking management (T6.1), and risking overspill into the Highgate Outer CPZ. It compromises pedestrian and cyclist safety (T5) due to Red Route conflicts and unsafe access, while proposed disabled bays are poorly	The scheme is to be secured as 'car-free', meaning future occupiers will not be eligible for on-street parking permits, thereby discouraging private car ownership in line with planning policy. This approach is explicitly supported where developments are located close to public transport, such as in the case here Highgate Underground station. The proposed accessible parking bays are positioned well away from

	located opposite a lorry turning point (T6.5)	the entrance to the adjacent commercial site, on the opposite side of Archway Road. These arrangements have been reviewed by Transport Officers and found to be acceptable.
25.	Unsafe highway interface with documented collisions and no Road Safety Audit or mitigation measures. Refuse collection arrangements involve hazardous vehicle manoeuvres on a Red Route, with no alternative solution offered.	As set out in the Committee Report a Transport Assessment has been submitted outlining access improvements to this site, namely zebra crossings. Such preliminary designs have been subject to an independent Stage 1 Road Safety Audit, included within the assessment. In terms of refuse collection the statement is noted, however it is pointed out that the proposal includes a designated loading bay area at the front of the site, which provides sufficient space for a refuse vehicle to park safely, carry out collections, and exit without obstructing traffic or compromising highway safety.
26.	Arboricultural surveys incomplete; root protection areas and tree canopy estimations inadequate. Trees proposed for removal lie on private property.	The statement regarding incomplete Arboricultural surveys and inadequate estimations is unclear. The Arboricultural Report submitted with the application has been reviewed by an Arboricultural Officer with requisite technical knowledge and is considered acceptable for the purpose of assessing tree impacts. As per page 37 point 60 of the Committee Report no trees on neighbouring land are proposed for removal.
27.	Cumulative impact of nearby major schemes not assessed; traffic, construction noise, daylight losses omitted; site-specific environmental impacts and traffic impacts ignored.	Planning policy does not require cumulative impact assessment of major schemes unless specifically triggered by policy (i.e. a large site maybe subject to a specific site allocation, triggering such requirements). In the case of Highgate ward, it is also pointed out

		that there are very few major applications due to limited site availability etc. The proposal here has been considered on its individual merits, in line with adopted policy.
28.	Biodiversity Net Gain requirements not demonstrated; no secured management plan provided / Methodology for calculating biodiversity net gain not correctly applied.	The claim that Biodiversity Net Gain (BNG) has not been demonstrated is unsubstantiated. The Committee Report (paras. 6.140–6.141) confirms that a BNG metric was submitted, with a baseline habitat value of 0.42 units and a post-development value of 1.43 units, plus 0.03 hedgerow units. This equates to a 245% net gain, based on accepted methodology and site conditions. As per the Committee Report, two conditions have been imposed, Condition 11 requiring submission of a Biodiversity Gain Plan, and Condition 12 securing associated BNG monitoring, with it being fully acceptable to secure such detail prior to commencement.
29.	The building's energy performance falls short of Part L targets, contributing to higher CO ₂ emissions; the TM59 overheating analysis indicates inadequate night-time thermal comfort even with fully open windows, illustrating non-compliance with statutory energy efficiency requirements.	The Climate Change Officer who provided comments on this case has re-affirmed that the development delivers an estimated 77% reduction in CO₂ emissions compared to the Part L 2021 baseline, significantly exceeding both the minimum 35% on-site reduction requirement and the GLA benchmark of 50% for residential schemes. A carbon offset payment of £10,830 + 10% management fee is required to offset the carbon shortfall and meet the zero-carbon policy, with this to be secured as part of the planning obligations detailed in the Committee Report. The approach complies with London Plan SI2 and Haringey SP4/DM22, subject to conditions.

30.	Gardens extend to boundary walls on private property (98–108 North Hill) and land behind is privately owned; the proposal fails to respect legal boundaries and does not account for resident control over access.	The development will be carried out within the red line boundary of the application site and will not extend onto land outside the relevant ownership. The existing boundary wall with the North Hill properties will remain in place.
31.	No formal EIA screening opinion has been issued or published, despite site proximity to a designated sensitive area (Highgate Woods) and the overall size of the combined floor plan, living roofs, and outdoor spaces, preventing residents from verifying compliance. Regulation 6 & 8 on screening also applies. Regulation 15 on scope of the EIA also applies. Schedule 2 on scale applies (total cumulative development footprint).	The issue of the need for an EIA is outlined in the Committee Report – paras 6.138 to 6.139. The specific objection regarding the absence of a formal EIA screening opinion is noted, however under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, EIA screening is required only where a development is likely to have significant environmental effects, assessed on a case-by-case basis. The relationship with the Highgate Wood is addressed in the Committee Report. Taking account of the nature of the site and its proximity to Highgate Wood there is no basis to argue that significant environmental effects will arise, nor are such claims substantiated in the representation.
32.	Fire Strategy Report fails to assess adjacency to Esso Wellington Services petrol station, creating a material safety risk. Potential impact an adjacent standard compliance BS 9991:2024.	The objection regarding fire safety in relation to the adjacent Esso Wellington Services is noted. While BS 9991:2024 is not itself a material planning consideration, it is accepted its relevance may arise indirectly through matters such as site layout, access, and building safety. In this case, the part of the site adjoining the petrol station is adjacent to a car wash, not the forecourt or fuel infrastructure or electric charging stations which are located further away. This arrangement, when considered proportionately, cannot reasonably be said to represent a material safety risk or to contravene BS 9991:2024. A Fire Statement was submitted with the application and

		addresses fire safety in terms of the building's performance and function with it accepted detailed compliance with BS 9991:2024 would also need to be addressed at the Building Regulations stage.
33.	Development fails to properly assess CIL contributions and planning obligations in relation to cumulative impacts, undermining compliance with local charging and infrastructure funding requirements.	As set out in the Committee Report, the relevant CIL charges are identified, and it is equally noted that the proposed development, being a social housing scheme, would qualify for 100% CIL relief, subject to the correct process being followed under the statutory social housing relief provisions. The development is however subject to planning obligations as set out in the Committee Report.
34.	Concerns have been raised about procedural bias, outlining that the Council is acting as both applicant and decision-maker, with the planning officer identified as both the applicant and report author, thereby undermining perceptions of impartiality.	The objection suggesting a conflict of interest is noted with it pointed out the planning officers are not the applicant in this case. Rather the application has been submitted by the Council's Housing Delivery Team, who are responsible for preparing and commissioning the technical reports that support the scheme etc. As set out in the Committee Report, the Council has implemented governance measures, including a Directors' Agreement and oversight by the Chief Executive and relevant portfolio holders, to ensure transparency and procedural compliance. The role of the planning officer is to assess the application against planning policy and all material planning considerations, and to make a recommendation to the Planning Sub-Committee. There is no conflict of interest in this process.
35.	Tall buildings, out of character with the area, impact negatively on amenity contrary to London Plan Policy D9.	While the Committee Report comprehensively deals with the issue of design of the building and how it would sit in its surroundings and its implication for amenity etc, for the purpose of clarity it is pointed out that

		the building proposed does not meet the London Plan definition of a tall building - defined as not less than 6 storeys or 18 metres from ground to the uppermost floor level.
35.	Archaeology not assessed; no desk-based study despite Highgate Archaeological Priority Area; predetermination evaluation missing.	The objection regarding archaeology is noted however the site does not currently fall within a designated Archaeological Priority Area (APA). It is however acknowledged that under the emerging draft Archaeological Priority Area Appraisal, which will inform the new Local Plan, the site would fall within a Tier 3 APA. These areas are defined based on geological, topographical, or land use characteristics in relation to known patterns of heritage asset distribution and would typically trigger a desk-based archaeological assessment. In this case, the site is previously developed and does not exhibit geological, topographical, or land use characteristics that would suggest a high probability of archaeological features.
36.	Construction vibration not mitigated; risk of structural damage to nearby heritage buildings.	The objection regarding construction vibration and potential structural impact on nearby heritage buildings is noted however planning consent cannot be refused on the basis of construction impacts alone. As reflected in the Committee Report a Demolition and Construction Logistics Management Plan (DCLMP) and a Demolition and Construction Environmental Management Plan (DCEMP) will be secured by condition to manage and mitigate the impacts. Equally as explained in the Committee Report the proposed development is well separated from the North Hill terrace, with no physical connection that would compromise neighbouring structures

		and importantly the scheme does not involve basement excavation, as such allowing for more standard foundation design.
37.	Lack of independent verification of technical reports, namely daylight/sunlight, energy, drainage	The objection regarding the lack of independent verification of technical reports is noted, however as outlined in paragraph 13 of the Committee Report, Officers have the requisite knowledge, training, and experience to assess the different material considerations. There is no formal requirement within planning legislation or policy to commission an independent third-party review of such reports.
38.	Preliminary Ecological Appraisal was conducted without full site access, relying on street-level observations.	While it is noted that the Preliminary Ecological Appraisal was conducted without full site access, this approach is considered proportionate given the nature of the site, which is predominantly hard-surfaced with minimal vegetation and only three trees (T2, T4 and G1). Ecological appraisals can be desk-based and carried out from external viewing positions where appropriate, particularly for previously developed urban sites with limited ecological value.
39.	Concerns have been raised about procurement, stating that there is no evidence consultants supporting the application were appointed through a competitive or transparent process, thereby breaching Haringey Council's Contract Procedure Rules and relevant national standards.	While it is fully accepted that questions around procurement may be raised, the LPA is not involved in the commissioning or procurement of technical consultants for this application. As such the LPA it is not in a position to comment on these matters and furthermore, procurement processes are not material to the planning merits of the application and to its formal assessment. Such concerns need to be directed to the applicant, the council's Housing Delivery Team in this case.

40.	Procedural integrity and reliability of technical documents submitted in support of the planning application questioned, namely absence of formal authorship, professional accreditation, digital certification and version control etc.	The objection regarding the procedural integrity and reliability of technical documents submitted in support of the application is noted however it is important to clarify that the Local Planning Authority (LPA) does not control the procurement of consultants appointed by applicants, nor does it prescribe the format or presentation of supporting documentation. The style, branding, and certification of such reports are determined by the commissioning party and the consultant's internal procedures etc. While it is accepted it is good practice for technical reports to include professional accreditation, authorship, and version control, these are not statutory requirements for validation of planning submissions. The LPA's role is to assess the content and conclusions of submitted documents in planning terms, not to audit their procurement or internal quality assurance processes.
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Daylight and Sunlight Impacts in relation to extension at No. 108.

Officer analysis:

Additional daylight and sunlight analysis has been provided in respect of No. 108 North Hill, following the grant of planning permission for a rear extension under reference HGY/2024/3086 approved in January 2025. Initial notice served to LBH Building Control in September 2025, implies that works are expected to commence shortly.

This supplementary assessment considers the potential impact on internal spaces within the extended property, with particular focus on the kitchen and dining areas. These spaces have been assessed separately in accordance with BRE guidelines, which recommend individual analysis where there is a physical separation or change in floor level, in this case there would be a slight step between the two areas, although in reality the extended room forms part of a visually connected space. The update relates solely to the inclusion of the approved rear extension and does not change the other finding in relation to other properties in this terrace already tested.

The 3D model was updated to incorporate the extension, with daylight (VSC and NSL), sunlight (APSH), and overshadowing analyses re-run in relation to this

property. The updated findings confirm continued compliance with BRE 2022 guidance, with only a minor technical variation noted to one kitchen/dining window.

The analysis confirms that marginal daylight shortfalls in the proposed condition are attributable to the extension creating an inner room arrangement, which inherently limits access to the external vertical sky component, with this common in relation to extended rooms. This results in slightly reduced daylight levels compared with the existing layout but remains consistent with BRE methodology and expectations for such configurations. Notably however the existing kitchen is served by a single small window positioned close to the current outrigger, which lies due south-west of the window. With the outrigger removed, the kitchen will benefit from larger glazing on the new vertical elevation as well as two rooflights, thus improving daylight levels and making the space brighter overall.

In addition, it is pointed out the approved extension could be amended, subject to an application and there being no adverse impact on neighbouring amenity, to include slightly further roof glazing, therefore helping enhance daylight penetration into the inner dining area.

Additional condition:

30. Prior to the installation of any external lighting to the rear courtyard or roof terraces, full details shall be submitted to and approved in writing by the Local Planning Authority. The submitted scheme shall specify the type, location and height of all proposed lighting, confirm that the lighting will be low level, setting out luminance levels, light spread and hours of operation. The lighting thereafter shall only be installed as approved, and operated only in accordance with the approved details.

Reason: To safeguard the amenity of neighbouring occupiers and protect the visual character of the locality, in accordance with Policies DM1 and DM23 of the Development Management Development Plan Document 2017.

UPDATE FOR CONSIDERATION AT PLANNING SUB-COMMITTEE Item No. 9

Reference Nos: HGY/2022/4319 & HGY/2022/4320	Ward: Bruce Grove
Address: Edmansons Close, Bruce Grove, London, N17 6XD	
Proposal: HGY/2022/4319 Full planning application for the demolition of existing laundry building and 1970s infill building; alterations and extensions to 44 existing almshouses to create 8 x 1 bed, 12 x 2 bed and 6 x 3 bed homes; alterations to existing Gatehouse to provide 1 x 2 bed homes; construction of 1 x new build 3 bed home to replace 1970s infill building; construction of a new apartment building comprising 7 x studio homes and 9 x 1 bed homes; construction of 4 x new build 2	

bed homes within two new pavilions (2 homes in each pavilion, 4 homes in total); with landscaping; improvements to access; car parking; and ancillary development thereto.

HGY/2022/4320 Listed building consent for the demolition of existing laundry building and 1970s infill building; alterations and extensions to 44 existing almshouses to create 8 x 1 bed, 12 x 2 bed and 6 x 3 bed homes; alterations to existing Gatehouse to provide 1 x 2 bed home; construction of 1 x new build 3 bed home to replace 1970s infill building; construction of a new apartment building comprising 7 x studio homes and 9 x 1 bed homes; construction of 4 x new build 2 bed homes within two new pavilions (2 homes in each pavilion, 4 homes in total); with landscaping; improvements to access; car parking; and ancillary development thereto

Applicant: The Drapers' Almshouse Charity / The Drapers' Company

Page 153: APPLICATION DETAILS

Amend the description of development (from above) as below. Additional wording in in **bold** font:

Demolition of existing laundry building and 1970s infill building; alterations and extensions to 44 existing almshouses to create 8 x 1 bed, 12 x 2 bed and 6 x 3 bed homes; alterations to existing Gatehouse to provide 1x 2 bed home; construction of 1 x new build 3 bed home to replace 1970s infill building; construction of a new apartment building comprising 7 x studio homes and 9 x 1 bed homes; construction of 4 x new build 2 bed homes within two new pavilions (2 homes in each pavilion, 4 homes in total); with landscaping; improvements to access; provision of **five Blue Badge** car parking **spaces**; and ancillary development thereto.

Page 156: RECOMMENDATION

Summary Lists of Conditions and Informatives

The following Condition headings to be amended:

14. Replace 'Biodiversity' with 'Community Use Plan'

The following Condition heading to be added:

29. Removal of Permitted Development

Page 162: PROPOSED DEVELOPMENT

Para 3.1.7 – bullet point to be added: 'Removal of private car parking and introduction of 5 Blue Badge parking bays.'

MATERIAL PLANNING CONSIDERATIONS

Page 183: Para 6.3.49, replace 'almost half (48%)' with: '**78.69%**'

Page 189: Para 6.4.26, to be amended from: 'level 1' to instead read: 'level 2'

Page 189: Para 6.4.27, to be amended from 'level 1' to instead read: 'level 2'

Page 208: Para 6.7.4, replace sentence with: 'The assessment finds that overall, the impact of the development on existing neighbouring residential properties is not significant'

Page 217: Para 6.11.18, replace 'Preliminary Economic Assessment' with 'Arboricultural Impact Assessment'

Page 223: APPENDIX 1 - Planning Conditions and Informatives

The following additional conditions to be added:

Community Use Plan

14. Prior to any works on site commencing, a Community Use Plan setting out how the community use for the chapel will operate shall be submitted to and approved in writing by the Local Planning Authority. The use of the chapel shall thereafter only be operated in accordance with the approved Community Use Plan.

Reason: In order to ensure that the community plan for the chapel benefits future occupiers and to comply with Policy DM49 of the Development Management Development Plan Document 2017

Removal of Permitted Development

29. Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) Order 2015 (and any order revoking and re-enacting the order) no extensions or outbuildings shall be built and no new window or door openings inserted into any elevation of the dwellings (other than that development expressly authorised by this planning permission).

Reason: In order to safeguard the amenity of neighbouring occupiers and to comply with Policy DM1 of the Development Management Development Plan Document 2017.

Page 241: APPENDIX 2. Listed Building Consent

The following condition to be amended with amended wording (in **bold** font)

Building Recording

3. No works, including demolition, shall take place on site until an historic building recording survey **level 2** of the listed building(s) concerned has been carried out by an **heritage specialist consultant** or organisation in accordance with a

written scheme of investigation which shall first have been submitted to and agreed in writing by the Local Planning Authority.

Reason: To ensure that the special architectural or historic interest of the Listed Building is preserved and to comply with Policy DM9 of the Development Management Development Plan Document 2017 and the provisions of the National Planning Policy Framework.

Page 251: APPENDIX 4: Internal and External Consultee Response

LBH Conservation comments -

Penultimate line under 'comment' section to be amended from: 'level 1' to instead read: 'level 2'