

Neighbour representations

Issue and representations	Officer comment
Principal, land use and housing	
Area will not benefit from the proposed development	<p>The site is vacant and has been unable to be let despite being marketed for several years. The proposed development will greatly improve the state and appearance of the site and mews as well as adding much needed housing stock including social rented units.</p> <p>The principle of the development is assessed in detail at section 6.3 of this report.</p>
There is a lack of social housing and it will not be truly affordable	<p>The level of affordable housing provided (c35% by habitable room) meets London Plan requirements. Furthermore, all AH units will be social rented to which the Council will have first right of refusal should they wish to add them to their own affordable housing stock.</p> <p>Affordable housing matters are assessed in detail at paragraphs 6.4.7 – 6.4.14 of this report.</p>
Provision for social homes however, concerns with the nature, location and entrance to these properties	<p>Council's Housing Officer is agreeable to family homes in this scheme. This is a mews development and as such, some of the private units and the social units will have entrances and potentially outlooks towards the rear of other buildings. Council's Housing Officer does not consider that the social units have been specifically picked out and they are in no different a position to many of the private homes. All of the homes also have habitable rooms facing the internal 'mews' area and can access/egress through this area.</p> <p>Affordable housing matters are assessed in detail at paragraphs 6.4.7 – 6.4.14 of this report.</p>
Social housing units will have a huge demand on infrastructure	<p>The occupancy levels of social housing compared to market housing aren't so different as to be considered to materially impact on infrastructure.</p>
The change of use needs to be carefully considered with the loss of a commercial premises	<p>Loss of employment use is assessed in detail at paragraphs 6.3.2 – 6.3.8 of this report.</p>
There is already a lot of housing development taking place in the area	<p>The Council is required to meet housing targets in accordance with national, regional and local planning policies. There is considered to be a housing shortage in London.</p>

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	Housing provision matters are assessed in detail at paragraphs 6.3.9 – 6.3.10 of this report.
The development will be good for the area and support local infrastructure	The principle of the development is assessed in detail at section 6.3 of this report.
Poor quality accommodation provided that will also be exacerbated by the adjoining railway	<p>All units met the required Nationally Described Space Standards with all being either dual or triple aspect but one (which is 1 bedroom unit, south facing). The majority of units have private amenity space, access to communal space or both and those that have neither (7) are the smaller units 1 & 2 bedroom, with access to Alexandra Park approximately 400 metres away. In terms of daylight within the proposal, a sample of worst case scenario rooms were measured and the rooms falling short were living rooms that fell only just short. For a higher density development in an urban location, this is considered to be a good outcome. Internal noise levels i.e. mitigating against the adjacent railway land will be appropriately controlled by way of condition as is standard practice.</p> <p>Quality of residential accommodation matters are assessed in detail at section 6.6 of this report.</p>
Provides insufficient amenity space, particularly child playspace	<p>Given the constraints of the site, it has not been possible to meet all of the amenity space requirements within the development. However, as previously noted the majority of the units have private amenity space and there is also communal amenity space and relatively close access (approximately 400m) to a large area of recreational facilities, Alexandra Park. In terms of dedicated child playspace, the on-site provision requirement for under 5 year olds, which is considered key, has been met. In accordance with policy, the remainder can be met through access to local facilities in conjunction with a financial contribution towards their improvement.</p> <p>Amenity space matters are assessed in detail at paragraphs 6.6.5 - 6.6.9 of this report.</p>
Size, Scale and Design	
The development is far too dense and an overdevelopment of the site	The proposed development would be within the London Plan density range for unit numbers but in excess of the guidance range for habitable rooms. However, the higher level of

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	<p>habitable rooms reflects in part the provision (33%) of 3 and 4 bedroom family units, 5 of which, it is important to note, are social rented. This weighs in the development's favour. It is also important to note that the London Plan indicates that it is not appropriate to apply the London Plan Density Matrix and its thresholds mechanistically. Its density ranges for particular types of locations are broad, enabling account to be taken of other factors relevant to optimising potential including local context, design and transport capacity which are particularly important, as well as the availability of social infrastructure.</p> <p>Density matters are assessed in detail at paragraphs 6.5.5 – 6.5.12 of this report.</p>
A gated development is not acceptable	<p>The gate can be partitioned to allow pedestrian access during the day, whilst still managing vehicular access appropriately. It can then be closed at night to maintain security given it is private property.</p> <p>Access matters are assessed in detail at paragraphs 6.8.5 – 6.8.6 of this report.</p>
The architecture is not creative with a poorly designed courtyard and playspace and does not respond or reflect the surrounding area or buildings	<p>The application is challenging, of a difficult, irregular geometry, narrow access through a currently unsightly mews alleyway and constrained by surrounding existing residential properties. However, the proposal is considered to be carefully designed to respond to this and improve the appearance of the site. Of course, architectural aesthetic is subjective.</p> <p>The overall design and appearance of the scheme including the 'courtyard' is assessed in detail at section 6.5 of this report.</p>
Parking, Transport and Highways	
Lack of justification for low level parking and not being appropriate for car free/permit free development will increase parking pressure in an area where traffic congestion is already a concern	<p>The site is in close proximity to Alexandra Palace railway station and two bus routes, the PTAL is predicted by TfL to increase to 4 in 2021 and draft London Plan policy encourages car-free development. Therefore, in this instance, it is considered acceptable to designate the proposed development as 'permit-free'.</p> <p>Whilst it is acknowledged that there will be increases in parking demands and pressures as a result of the development, these will be reduced with the proposed mitigation measures and</p>

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	<p>permit free/car free status and the increase in local parking stresses and not result in demonstrable harm.</p> <p>Car parking matters are assessed in detail a paragraphs 6.8.8 – 6.8.17 of this report.</p>
<p>Access in and out of site is unacceptable particularly for the Fire Brigade, servicing and deliveries</p>	<p>The access to the site is as existing and therefore the owner of the site has a right to use it as is. It is acknowledged that large vehicles will not be able to enter the site, but as noted, this is the existing situation. However, to ensure access and use of the gate, is appropriately managed, a condition requiring a management plan along with a delivery and serving plan is recommended. This will be an improvement over the current arrangements, which allow unrestricted access by commercial vehicles. Furthermore, the number of car parking spaces on site has been reduced from 4 to 3 (blue badge) so that those vehicles that can enter the site can make the turning manoeuvre.</p> <p>Access matters are assessed in detail at paragraphs 6.8.5 – 6.8.6 of this report.</p> <p>Whilst not a planning matter, the London Fire Brigade has been consulted on the application and is satisfied with the proposal and noting Building Regulations Approved Document B B5 for access and facilities for the fire service.</p> <p>Fire safety matters is assessed in detail at section 6.20 of this report.</p>
<p>Concerns with the upgrade, improvement, maintenance and management of the lane noting there is no space for a separate pedestrian path</p>	<p>The application proposes to upgrade the mews and this will be secured by condition requiring final details to be approved. It is noted that the mews is privately owned not Council owned and therefore, general public do not have a legal right to use the mews. However, the trip generation i.e. number of movements generated by the use will be lower than the existing and therefore, less potential for conflict with those pedestrians who may be using the mews. For this reason, a shared surface is considered acceptable in this instance.</p>
<p>Concerns with the transport assessment and methodology submitted</p>	<p>The submitted transport assessment and further supporting information has been prepared in accordance with the relevant professional standards and has been reviewed at several stages by the Council's Transport Planner. Specifically, the Lambeth methodology is the recognised standard for conducting parking surveys. The full technical specifications and methodologies</p>

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	<p>are detailed in both the applicant's submissions as well as Council's Transport Planner's comments on the application.</p> <p>Transport matters are assessed in detail at section 6.8 of this report.</p>
Neighbouring residential amenity	
Impact on daylight/sunlight of neighbouring properties, particularly those on Dagmar Road and Crescent Road	<p>The application includes a Daylight and Sunlight Report prepared in accordance with established BRE Guidelines and has been thoroughly reviewed by Council's Design Officer. The report finds that one neighbouring existing window in residential use would lose a noticeable amount of daylight and that two properties would experience a noticeable loss of sun on the ground to their amenity areas. Overall, the one window and gardens referred to above, whilst weighing against the scheme, do not significantly and demonstrably outweigh the benefits of the scheme.</p> <p>Daylight/sunlight matters are assessed in details at paragraphs 6.7.2 – 6.7.8 of this report.</p>
Impact on privacy/overlooking and outlook of neighbouring properties	<p>Windows on upper floors are angled to avoid looking towards existing neighbours, obscured glazed where not serving habitable rooms, high level where other windows also serve habitable rooms or focussed onto the other (north-east and south-east) sides of the proposal where they would look away from neighbours. The result is no clear windows, at eye level, with a direct or reasonably direct view of existing neighbours, in the upper floors of the relevant proposed flats, that is in Blocks B and C, and in the small 1st floor element of one house in Block D. However, there is one first and one second floor window in the north-west facade of the two storey end elevation of Block C that would look towards the back of Dagmar Terrace, albeit approximately 20 metres separation window to window, which is considered acceptable. Two first floor windows in the end elevation of Block D house also face the rear of Dagmar Terrace and whilst separated by only 15 metres, angle pitch of the ground floor sufficiently obscures views so as to make this distance, on balance, acceptable.</p> <p>Privacy and outlook matters are assessed in details at paragraphs 6.7.9 – 6.7.12 of this report.</p>
Noise impacts on surrounding	Given that noise intensive uses have the potential to currently operate from the existing

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residential properties	<p>commercial uses on site, its redevelopment for entirely residential accommodation is considered to represent an improvement in this regard. The proposed development will also have the positive impact of helping to screen surrounding residential properties from noise emanating from the adjacent Network Rail operations.</p> <p>Noise matters are assessed in detail at paragraph 6.7.13 – 6.7.15 of this report.</p>
Environment and public health	
Construction debris and disturbance	<p>An element of disturbance is expected during construction and the Control of Pollution Act 1974 seeks to limit noisy building works outside 8am to 6pm, Monday to Friday and 8am to 1pm Saturday. Furthermore, conditions requiring submission and approval of a Construction Management Plan and Considerate Constructors Scheme registration are recommended to mitigate these potential impacts.</p> <p>Construct impacts are assessed in detail at paragraphs 6.7.16 – 6.7.17 and 6.8.21 of this report.</p>
The site is a hazard due to land contamination issues (sealed oil/sludge tanks underground) and more details required.	<p>The proposed development will leave the slab intact, which is a recognised, acceptable method to preventing exposure to contaminated land. Furthermore, Council's Environmental Health has not objected and has recommended standard conditions for investigation and remediation if found required.</p> <p>Land contamination matters are assessed in detail at paragraphs 6.9. 7- 6.9.10 of this report.</p>
Appropriate refuse management required i.e. what refuse strategy is in place to support the development as well as adjoining commercial uses?	<p>Council's Waste Management Officer has noted the pulling distances exceed Council's collector requirements however, does not object to the proposed development. The applicant has agreed to engage private collection arrangements and this will be secured by condition. The applicant cannot be held responsible for the collection arrangement of the adjoining commercial uses.</p> <p>Refuse collection matters are assessed in detail at paragraph 6.8.20 of this report.</p>
The development is not 'environmentally friendly' and matters such as trees, landscaping and	<p>The proposed development, given the site constraints, has limited opportunities for soft landscaping. However, when considered against the existing context, the proposed development will be an improvement through the introduction (secured by condition) of</p>

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ecology/biodiversity particularly given proximity to ecological corridor (Network Rail land) have not been adequately addressed	<p>landscaping that includes planter boxes and features to encourage bat and bird roosting that do not currently exist.</p> <p>Biodiversity and ecology matters are assessed in detail at paragraphs 6.9.24 – 6.9.28 of this report.</p>
Impact on air quality and carbon management not adequately addressed in submission and development should be seeking to lower emissions noting the 'declaration of a climate emergency'	<p>The application includes an Air Quality assessment that Council's Pollution Officer has no objection subject to a condition requiring an updated version being submitted given consideration to neighbouring sources and a clear statement on number of car parking spaces, which officers note, has reduced from 4 to 3 since these comments.</p> <p>Air quality matters are assessed in detail at paragraphs 6.9.2 – 6.9.6 of this report.</p> <p>An energy report is included with the application and has been assessed by Council's Sustainability Officer who does not object to the proposed development. The schemes proposed using photovoltaic panels and the carbon offset amount will be secured by s106 as is standard procedure and policy compliant</p> <p>Energy and carbon reduction matters are assessed in detail at paragraphs 6.9.17 – 6.9.20 of this report.</p>
Asbestos concerns with the proposed development	Asbestos is not a material planning consideration and is dealt with under separate legislation. However, as per Council's Environmental Health Officer's comments, an informative highlighting that an asbestos survey be carried out prior to demolition is recommended.
Impact proposed development will have on the water table	<p>The proposed development will be built using the existing slab and therefore, not impact on the water table through new foundations etc. Furthermore, the proposed development would result in an improvement in run-off rates compared to the existing situation through the use of storage crates before being released under control. Council's Drainage Engineer has no objection to the proposed development.</p> <p>Flood risk and drainage matters a assessed in detail at paragraphs 6.9.11 – 6.9.16.</p>
Other matters	
Disruption on local infrastructure and utilities	Construction activities are temporary and the potential impacts will be mitigated through standard conditions requiring Construction Management and Logistics Plan as well as

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	registration with the Considerate Constructors Scheme. Any damage to utilities etc will need to be repaired and the costs met by the applicant.
London Fire Brigade should be consulted on means of escape and fire safety from the cladding propose	As previously noted, this is not a planning matter however, the London Fire Brigade has been consulted on the application and is satisfied with the proposal. This would be considered in detail at Buildings Regs stage.
Security concerns and anti-social behaviour due to poor layout of buildings	The Metropolitan Police has been consulted on the application and also involved in the design of the scheme pre-submission. They do not object to the scheme and recommend standard conditions to demonstrate and then achieve Secured by Design accreditation. The mews design will insure that there is overlooking of communal areas and entrances, which is a recognised principle of Secured by Design. Security matters are assessed in detail at paragraphs 6.6.22 – 6.6.24.
Concerns over the feasibility of the retaining the existing wall	This is not a planning matter rather one dealt with under Building Regulations.
The flats are for financial gain	This is not a planning matter.
The development is already being marketed on websites	This is not a planning matter.
Impact on businesses reliant on access	This is a civil matter / rights of way issue between the owner of the site and the adjoining commercial properties that share access.
Impact of Cross Rail 2 on the site	Crossrail has been consulted and confirms that the application relates to land outside the limits of land subject to consultation by the Crossrail 2 Safeguarding Direction and therefore have no comment on the application.
Network Rail's stipulations for housing developments alongside major railways	Network Rail has been consulted on the application and does not subject to conditions and informatics, which it is recommended be placed on the planning permission should it be granted.

Appendix 1 (cont.) to Agenda Item 8: Third Party response summary.

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Public consultation has been inadequate	The application has been consulted upon in accordance with the Council's Statement of Community Involvement and relevant statutory requirements.
There are a number of assessments that are missing i.e. fire, contamination, protected species	All documents considered necessary to validate the application in accordance with the Council's Validation List were submitted with the application.
The amended plans do not address the concerns that have been raised by residents	For the reasons given in the main body of this report, officers consider that the scheme that has been submitted and subsequently assessed, is acceptable.
The Council's Design Office should revisit his comments	The design has been assessed by the QRP, Design Officer and Planning Officers.