

Copy of representations

Representation 1: Highways England

Received via email

Consultation: Haringey Community Infrastructure Levy Partial Review: Draft Charging Schedule Consultation

Highways England Ref.: #9309

Dear Sir/Madam,

Thank you for your e-mail of 17 December 2019 inviting Highways England to comment on the above consultation.

Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

Our interest in such strategy documents is specifically focussed on the council's approach to highway and transport matters in relation to regeneration and new development. We are keen to understand how local authorities initially identify and prioritise transport improvements in order to deliver sustainable development. Specifically how local authorities set and implement policy to manage trip demands and ultimately how these might affect the safe and efficient operation of the SRN for which we are responsible.

It should be noted that, in accordance with DCLG guidance, any development contributions towards SRN improvements would be secured via S278 agreements, and not via a CIL Reg123 List or S106. The use of S278s will enable multiple sites to contribute if appropriate, and also secures the Secretary of State's position by ensuring that 100% of contributions go towards the SRN improvement. However, in some cases it could be more expedient for Highways England to be party to the S106 and secure mitigation through obligations.

I trust that the above comments are of assistance to you and look forward to any future consultations.

Thank you again for involving us in your consultation process.

Regards,

Kayley Smith (On behalf of Janice Burgess, Area 5 Spatial Planning Manager)

Representation 2: Environment Agency

Received via email

Dear Policy Team,

Thank you for consulting us on the CIL Draft Charging Schedule. We have no comments on the review of the rates.

We would be grateful if you could consult us on any future consultation on the spending of the CIL where we would have comments. For information I have attached our previous response to the CIL consultation.

If you have any queries please don't hesitate to contact me.

Best Regards,

Tom Craig

Representation 3: Sports England

Received via email

Dear Sir/Madam,

COMMUNITY INFRASTRUCTURE LEVY - DRAFT CHARGING SCHEDULE

Thank you for consulting Sport England on the Draft Charging Schedule.

Sport England welcomes that health, school and higher education and other uses would have a 'Nil' rate therefore new sport and recreation facilities would not have to pay the levy. As a result, CIL would not have a detrimental impact on the delivery of such facilities and the ability for the Council to achieve its health aspirations.

If you have any questions or would like any further advice please do not hesitate to contact me.

Kind Regards

Mark Furnish

Planning Manager

Date: 04 February 2020
Our ref: 303986
Your ref: Partial Review of the Community Infrastructure Levy Draft
Charging Schedule



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Dear Sir or Madam

Planning Consultation: Partial Review of the Community Infrastructure Levy Draft Charging Schedule

Thank you for your consultation request on the above Strategic Planning Consultation, dated 18th December, 2019.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England have **no comments** to make on this consultation.

For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk

Yours faithfully

Sharon Jenkins
Operations Delivery
Consultations Team
Natural England

11 February 2020

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By email: ldf@haringey.gov.uk

Dear Sir/Madam

HARINGEY DRAFT CIL CHARGING SCHEDULE AND ASSOCIATED DOCUMENTS CONSULTATION

Lambert Smith Hampton (LSH) has been instructed by the Metropolitan Police Service (MPS) to make representations to the above consultation. This representation concerns the MPS facilities at Wood Green Custody Centre and Quicksilver Patrol Base; we have noticed that the existing clauses under 'Emergency Services' in the Haringey Infrastructure Delivery Plan (IDP) are incorrect and need to be deleted.

This representation also includes the requirement for 'Dedicated Ward Offices' (DWO) accommodation as part of the MPS estates strategy and the MPS' breakdown of infrastructure sought through Section 106 agreements. We explain the requirement for DWOs (out-reach facilities) in more detail below.

Haringey Infrastructure Delivery Plan: site reference to police facilities

We request that the following clauses are deleted from the Haringey IDP;

- 12.2 : London Mayor's recent announcements (2012) for emergency service provision in London mean that there may be changes to the police services in the borough including the potential reduction in services from Tottenham Police Station.*
- 12.3 : The Metropolitan Police considers the existing patrol facilities in Western Road N22 to be inadequate, and expensive to maintain. The facility has a temporary planning permission until 2014. The site is within the Haringey Heartlands growth area, and the Council will be keen to see that the land is used efficiently.*
- 12.4 : Although the draft Assets Plan by the Metropolitan Police (2007) indicated that the Patrol base will be considered as part of the proposed development of the Wood Green Custody Centre, this is no longer the case. Planning permission for the new police custody centre in Wood Green (without the patrol base) was granted in 2011, and the construction work has already started.*

Requirement for Dedicated Ward Offices / out – reach facilities

A DWO is a 24/7 base of operation for officers of the MPS. It is not a public facing office, but rather a location typically used by officers at the beginning and the end of their shifts which can be situated in a 'back of house location'. The MPS would pay a 'peppercorn' rent for the space in addition to service charges. The MPS currently police over 600 wards across Greater London, DWOs are integral to these efforts. The MPS requires 24/7 access to all DWOs for operational purposes. The attached document prepared by Knight Frank highlights the DWO requirement in more detail.

The MPS is requesting that the Haringey draft IDP includes a section which highlights the importance of the delivery of DWOs in schemes referable to the Mayor. The MPS is already having success in securing DWOs with developers (through planning applications) and Local Planning Authorities (through planning policy). In many cases, Local Authorities and developers consider the requirement to have a positive impact on development proposals.

We would be grateful if Lambert Smith Hampton (as the planning consultants for the MPS) is notified of major developments within the London Borough of Haringey where the incorporation of a DWO is considered to be appropriate. The MPS are now more focused on the delivery of DWO accommodation rather than seeking contributions through S106 (which is more of a longer term objective).

Other S106 contributions

We are pleased to see that the Haringey Local Plan references 'policing facilities' as planning obligations that the Council will prioritize. However, we request that the Haringey IDP includes a breakdown of infrastructure sought by the MPS through Section 106 agreements.

The MPS are not seeking financial contributions at present as a methodology has not yet been agreed for calculating financial contributions; however this is something the MPS are hoping to introduce.

A breakdown of non-building related infrastructure likely to be sought by the MPS (through future S106 requests) is as follows:

- **Staff set up costs**
 - Uniforms.
 - Radios.
 - Workstation/Office equipment.
 - Training.
- **Vehicles**
 - Patrol vehicles.
 - Police community support officers (PCSO) vehicles.
 - Bicycles.
- **Mobile IT:** The provision of mobile IT capacity to enable officers to undertake tasks whilst out of the office in order to maintain a visible presence.
- **CCTV technologies:** Automatic Number Plate Recognition (ANPR) cameras to detect crime related vehicle movements.
- **Police National Database (PND):** Telephony, licenses, IT, monitoring and the expansion of capacity to cater for additional calls.

Consultations with MPS

We request that Haringey Council acknowledges within the draft IDP that on schemes referable to the Mayor, the MPS will be consulted as a consultee with regards to the potential onsite delivery of a DWO facility. Requests should be sent to mps@lsh.co.uk.

Summary

We request that Haringey Council removes clauses 12.2, 12.3 and 12.4 from the IDP. We also request that the IDP includes a section highlighting the importance of the delivery of DWOs within areas in the borough that require additional coverage. We can provide 'DWO text' (to be incorporated within the IDP) on request.

We are pleased to see that Haringey Council will prioritize policing facilities for planning obligations, however request that the Council includes the full breakdown of infrastructure sought by the MPS in the IDP. Finally, we request that the MPS are consulted for the delivery of a DWO on schemes referable to the Mayor.

We consider that it would be sensible to arrange a meeting to discuss how the MPS property requirement for a DWO can be accounted for within the borough. We will look forward to hearing from you when you have had a chance to review the contents of this representation.

Yours faithfully,



Vincent Gabbe
Director

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Encl. DWO 'Pitch Pack'

Dedicated Ward Office (DWO) Programme: Pitching Pack & FAQs

◆ *What is a Dedicated Ward Office (DWO)?*

A DWO is a 24/7 base of operation for officers of the Metropolitan Police Service (MPS). It is not a public facing office, but rather a location typically used by officers at the beginning and the end of their shifts. The MPS currently police over 600 wards across Greater London, DWOs are integral to these efforts.

◆ *How many officers will use the DWO?*

The number of officers will depend on the number of wards being served out of the location in question. There will be a minimum of two wards at every location. An estimated break down is provided below:

Number of Dedicated Ward Offices	Number of Officers/ Lockers
2	7
3	10
4	13
5	16
6	19

◆ *How much space will the DWO require?*

The space requirement of the DWO is variable dependent. The first variable is the number of DWO teams which will operate out of the location. The more DWO teams, the larger the space requirement. The DWO teams also have requirements around access to toilets, showers, and a kitchen facility. If these services can be shared with an existing user then the amount of space required by the DWO is reduced, if such provisions do not currently exist then the amount of space required will have to increase accordingly so such services can be provided. An approximate guide for a DWO without welfare facilities provided is below, please note that this is subject to change:

Number of Dedicated Ward Offices	Number of Officers/ Lockers	Approximate space requirement without welfare facilities.
2	7	9 sq.m.
3	10	15 sq.m.
4	13	20 sq.m.
5	16	25 sq.m.
6	19	30 sq.m.

◆ *What are the site requirements of the Met Police?*

The sites will need to provide the following:

- Unrestricted 24/7 access for officers into the base;
- Airwave and 4G wireless connectivity/reception inside the DWO;
- Showers, toilets and kitchen facilities on site;

- Mains power for charging units etc.;
- Suitable ventilation for lockers;
- Perimeter of demise is sufficiently robust to meet MPS security requirements; and
- Site provider will only have emergency access rights to the MPS demise.

◆ *Will the MPS take a lease or a license?*

The MPS will not be taking leases on DWOs, and as such will be operating under a license.

◆ *What level of rent can the applicant expect to receive from the MPS?*

The aim of the DWO program is to operate as close to nil cost as possible. However, the MPS recognize that this is not always an option and rents can be negotiated on a site-specific basis if need be. Market rents are not viable.

◆ *Are MPS able to confirm that service charges/utilities, rates, etc. would be paid as usual?*

If required the MPS can cover the costs associated with the space, however, the aim of the DWO program is to operate as close to nil cost as possible.

◆ *Is it possible to see an example of a DWO configuration? What furniture is expected to be included within the office?*

A draft configuration of a two ward DWO base is provided below. The key furniture within the office is the officers lockers, charging stations for body-worn cameras, charging stations for tablets, an area for general storage and a changing area. Please note that this configuration assumes that toilets, showers, and kitchen facilities are shared with other users outside of the DWO office.

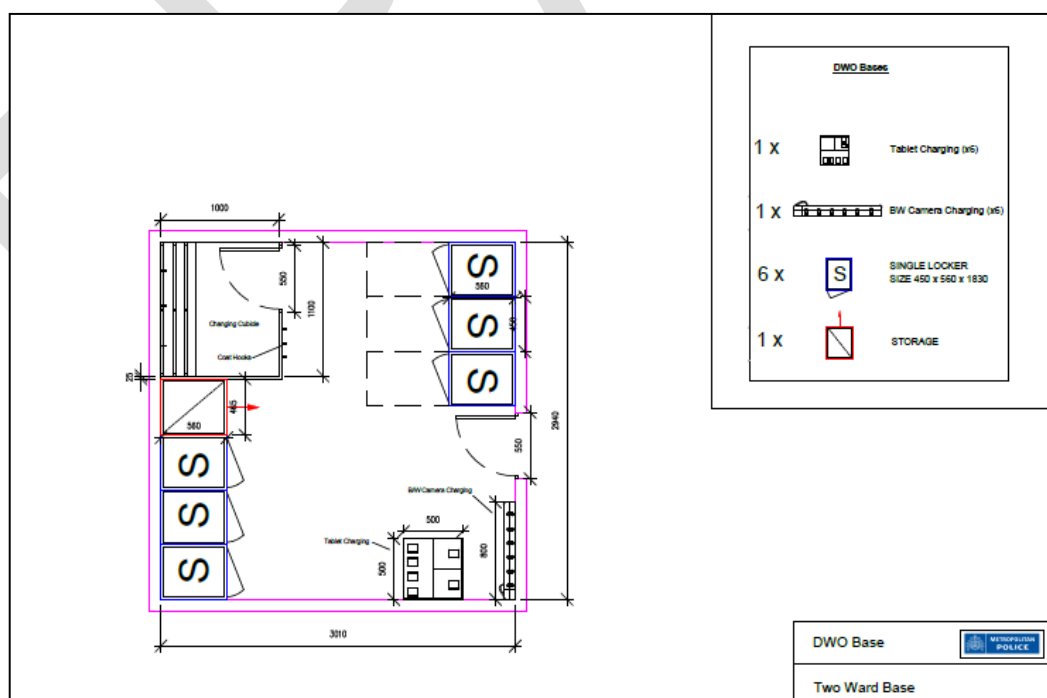


Image: A draft configuration of a two ward DWO base – Produced by the MPS.

- ◆ *Is it possible to see an example of a s106 agreement that includes a DWO?*

Not at this time.

- ◆ *Does the MPS require 24/7 access to the site?*

The MPS requires 24/7 access to all DWOs for operational purposes.

- ◆ *Does the MPS require a lift?*

No.

- ◆ *Does the MPS need access to power and water?*

Yes.

- ◆ *Where would the MPS like to be positioned in the building and on what floor?*

The priority of the MPS on any potential location is that the site meets the site-specific requirements discussed above, what floor and where are secondary concerns to the MPS.

- ◆ *Who would fit out the unit? Would shell and core be sufficient?*

The MPS can fit out the unit and will do so from shell and core if required on a site-specific basis.



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11 February 2020

Dear Sirs,

**Partial Review of London Borough of Haringey CIL – Draft Charging Schedule Consultation
Representations submitted on behalf of CBRE Global Investors – Rangemoor Industrial Estate**

We write to submit representations on behalf of CBRE Global Investors (CBREGI) responding to the Council's partial review draft Community Infrastructure Levy (CIL) consultation.

To summarise, CBREGI supports the Council's intention to review its CIL charging schedule, and welcomes the opportunity to constructively comment on the proposed revised charges. The intention of these representations are to highlight the opportunities for redevelopment of the Rangemoor Industrial Estate (RIE) to deliver a new high quality mixed use development, and highlight some issues in respect of the proposed new CIL charges.

Land Ownership

CBREGI is a real estate investment management firm which manages significant parts of the RIE on behalf of Shell Pensions Trust.

An ownership plan of the RIE is included at Appendix 1 of this letter. This shows the land managed by CBREGI on behalf of landowners Shell Pensions Trust together with land owned by London Borough of Haringey (LBH) and other smaller land parcels in separate ownership. The CBREGI buildings are situated on three sites along Rangemoor Road, Norman Road and Bernard Road.

Potential Mixed Use Redevelopment of Rangemoor Industrial Estate

The RIE represents a key opportunity in the borough for new mixed use development, including the removal of dated industrial units to enable the re-provision of high-quality industrial floorspace, supported by residential dwellings, potentially with social infrastructure or other land uses. It is in a sustainable location for residential development, positioned within close proximity to a range of local shops and services. It has a PTAL of 6a, located within easy walking distance of Seven Sisters underground station, Seven Sisters overground station, South Tottenham Railway Station overground station and Tottenham Hale overground and underground station, as well as being well served by bus routes.

Most of the land within the RIE is located in a Locally Strategic Industrial Site (LSIS), where draft London Plan Policy E7(B) indicates that development plans should be proactive and consider whether logistics, industrial and related functions could be intensified to provide additional industrial capacity, including to support the delivery of residential and other uses, such as social infrastructure. As required by Part E of the policy this should be considered as part of a plan-led process. In this respect, CBREGI has held initial positive discussions with LBH over the potential to work together within the planning policy-led process to bring forward mixed use proposals for the RIE.



The benefits of such development is clear. The CBREGI and LBH land together comprise almost 2 hectares of land. Together with the other land parcels, this represents a unique opportunity to both improve the industrial offering in the borough and also deliver a significant level of new homes in a range of tenures, within a comprehensive redevelopment. It will also complement the other mixed use developments to the east of the RIE which incorporate residential and industrial uses, including at Bernard Works (LPA ref: HGY/2017/3584) and 19 Bernard Road (HGY/2019/1490) which are either approved or with a resolution for approval.

Comments on Proposed Community Infrastructure Levy Rates

The objective of these representations is not to dismiss the Council's intention to ensure sufficient infrastructure is provided to facilitate new development, but to ensure that the emerging regime will deliver the infrastructure required to support the growth of the borough in a manner that would not undermine other aspirations, notably the delivery of affordable housing.

The following observations are made in order to put down a marker to ensure that as this process proceeds towards examination, and ultimately adoption, the CIL is reasonable, meets Council aspirations, and would not place unrealistic financial burdens on developers and landowners that would potentially render developments unviable. In particular regard is had to Regulation 14 of the Community Infrastructure Regulations.

The proposed new charge will likely be in place at least until at least the remainder of the plan period and so should be resilient to respond to new strategic sites coming through in planning policy, such as those coming forward through area specific Supplementary Planning Documents (SPDs) or Area Action Plans (AAPs). Such an approach may well be utilised for the redevelopment of the RIE, in accordance with London Plan requirements.

The RIE currently lies within the eastern area as set out in the Council's adopted 2016 CIL charging schedule, which for residential development sets out a charge of £15 per sqm. The Annual CIL Rate Summary for 2020 indicates that, taking into account indexation, this would equate to £20.96 in 2020.

Within the proposed partial review of the CIL, the RIE would be located within the eastern area, where the charge would increase to £50 per sqm for residential floorspace. This represents an increase of 139% over existing rates taking account of indexation, which is clearly a very significant increase. This is also in the context that mayoral CIL has risen in this location from the rate of £30 per sqm when first introduced in 2012 to £60 per sqm in April 2019.

Any CIL charges are non-negotiable, and so as a result, any subsequent impacts on scheme viability would necessarily result in reduced levels of planning obligations, and notably affordable housing. This is particularly salient for sites such as RIE where residential redevelopment would be expected to provide 50% affordable housing in accordance with the draft London Plan, at a 60/40% social/intermediate housing tenure split.

In this context, our analysis has already indicated that delivery of a mixed use development of RIE when taking a policy compliant level of affordable housing may not be viable based on existing CIL charging schedule.

It is noted within the Viability Assessment that the proposed CIL rates take account of some variance in affordable housing requirements in different scenarios, however the highest rate of affordable housing contribution which has been factored into the viability assessment is 40%. No appraisal has been carried out in respect of 50% affordable housing, which would be a requirement in some scenarios such as the



development of LSIS land and publically owned land as set out in the draft London Plan (the only way in which a lower level of provision would be acceptable in such instances is if robust viability evidence justifies this). This implies acceptance of a flexible approach to application of affordable housing policy requirements, and potentially infers that the 50% affordable housing requirement would not be viable. As such, we specifically ask the Council to test this scenario as it appears that it has not to date. We also propose that the Council carefully consider whether it would be appropriate to include within the CIL charging schedule a specific exemption or lower rate for residential floorspace on LSIS land such as RIE where these viability issues are likely to arise.

The Council should consider carefully the levels of infrastructure contributions which are actually needed to fund new local infrastructure. Simply charging the highest levels which it believes is possible could render schemes unviable, and in such instances affordable housing provision may well be reduced. We consider that this would run contrary to the Council's aspirations for the delivery of new homes in the borough and specifically affordable homes, as well as the comprehensive high-quality replacement of industrial floorspace. In respect of the RIE specifically, the proposed CIL level may have limited benefit for new infrastructure in the Seven Sisters locality, given that this area (with a PTAL of 6a) is already very well served by transport and other infrastructure.

Conclusions

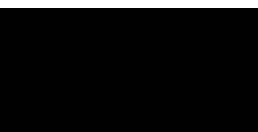
In principle CBREGI supports CIL as a means of ensuring that infrastructure is provided to support new developments, however we have concerns that the proposed level may result in reduced affordable housing contributions, and potentially discourage the redevelopment of sites, particularly LSIS land such as RIE which could bring numerous benefits. We also have concerns that the Council has not tested a 50% affordable housing requirement which would be applicable in cases of residential development of LSIS land such as RIE, in accordance with the new London Plan. Therefore, we ask that the Council considers whether it would be appropriate to set a lower rate for residential development on LSIS land within the borough.

I trust that the above provides informative comments to the current consultation.

I would be grateful if you could please confirm safe receipt of these representation and for above comments to be considered before the submission of the partial review draft CIL charging schedule.

Please do not hesitate to contact me should you wish to discuss any of the above further.

Yours faithfully,



John Cutler MRTPI PIEMA
National Development and Planning

Haringey Community Infrastructure Levy Partial Review: Consultation on Draft Charging Schedule and associated documents

Thank you for the opportunity to comment on the above consultation. This response is submitted on behalf of NHS Haringey Clinical Commissioning Group. We note that the consultation is a partial review of the CIL Charging Schedule and relates to increased CIL rates in the Eastern Charging Zone for residential use and student accommodation. New rates are also introduced for new forms of housing - Build to Rent housing and Warehouse Living. We support the increased CIL rates in the Eastern part of the borough which will help capture more CIL receipts from development to support necessary infrastructure.

The draft charging schedule does not refer to the Community Infrastructure Levy (Amendment) (England) (No. 2) Regulations 2019 which came into force on 1 September 2019. The amended regulations make changes to how CIL is charged, collected and reported and seek to clarify the relationship between CIL and s106 contributions.

Crucially, the removal of CIL Regulation 123 lifts the s106 pooling restriction and allows planning authorities to use CIL and section 106 obligations to contribute towards the same piece of infrastructure. Updated national planning guidance clearly distinguishes between the purpose of s106 obligations to mitigate site-specific impacts, subject to the tests in Regulation 122, and CIL which can be used to address the cumulative impact of infrastructure in an area.

In practice, the use of s106 obligations to mitigate site-specific impacts will tend to apply to larger developments which generate a critical mass of demand for new or improved infrastructure, where there is insufficient existing capacity to accommodate the additional demand.

Whilst this a partial review of the CIL Charging Schedule we would strongly encourage the Council to review its overall approach to developer contributions. This would require an update to the Planning Obligations Supplementary Planning Document (SPD) to acknowledge that s106 health contributions, both financial and in-kind, could be secured to address a site-specific impact. At present, section 13 'Social and Community Infrastructure' of the adopted SPD (March 2018) has restricted developer contributions towards new and improved healthcare infrastructure. Paragraph 13.6 states the Council's preference is for in kind facilities provided on-site as part of a development and secured by planning condition. This effectively rules out s106 financial contributions to deliver new and improved health facilities. Furthermore, a new facility secured by planning condition is not a planning obligation.

Paragraph 13.7 suggests that the Council or service provider (eg NHS) should compensate a developer for providing an in-kind facility which would serve the wider community. This is unreasonable. We consider that a new health facility provided as shell and core at a market rent is a commercial arrangement and not a planning obligation. Therefore, for a large facility the NHS would effectively be paying twice through market rent and compensation to the developer.

Haringey's Authority Monitoring Report 2018-19 (January 2020) confirms that no s106 developer contributions have been secured towards health infrastructure in the borough since 2011. This is largely due to the introduction of the Haringey CIL in 2014 and the expectation that health and wellbeing facilities would be funded by CIL as indicated on the CIL Regulation 123 List. Consequently, the Council has not sought s106 contributions for health facilities. Furthermore, no CIL receipts have been allocated towards health and wellbeing facilities.

Developer contributions towards healthcare infrastructure are vital to mitigate the impact of development on healthcare services and to address a funding gap. Haringey's Local Plan Strategic Policies expects development that increases the demand for community facilities and services to make appropriate contributions towards providing new facilities or improving existing facilities (Policy SP16), and the Council will prioritise its needs including community facilities and services including education, health and open space and policing facilities (Policy SP17). At present, these policies are not being implemented due to the restrictive approach in the Planning Obligations SPD.

The draft charging schedule is supported by an Infrastructure Delivery Plan Update. The update is dated April 2016 and the healthcare section requires updating with further commentary on NHS strategies, new models of care, estate priorities and funding constraints. We note that there are no cost figures for health in Table 6: Summary of Infrastructure Investment Estimates 2013/14-2026/27. The section on Growth Area Infrastructure requires updating to reflect the challenges and progress in delivering new infrastructure in Tottenham Hale, Wood Green, Green Lanes and north Tottenham.

We would welcome the opportunity to update the infrastructure delivery plan to identify current healthcare infrastructure requirements, funding sources and gaps and delivery models. We note that the Council is required to publish an infrastructure funding statement by 31 December 2020 identifying the infrastructure required to support development in an area and how it will be funded, using CIL, or s106 obligations, or a combination of both.

North London CCGs are developing guidance on the use of developer contributions for healthcare infrastructure, establishing consistent principles and sharing good practice across north London and beyond. The CCG would welcome the Council's input into the guidance and initially would like to meet to discuss the issues and a way forward.

Representation 8: Canal River trust

Received via email

Dear Bryce Tudball,

Thank you for consulting the Canal & River Trust on the draft Charging Schedule. I can confirm that we have no comments to make on the Charging Schedule itself, but would like to make a comment about the Infrastructure Delivery Plan. We note that this was last updated in 2016 and some elements are out of date. The Trust would be very pleased to work with LB Haringey to identify and scope out appropriate towpath and access improvements around the Lee Navigation, and subsequent funding mechanisms, which would help support the use of the Lee Navigation and its towpath for active travel, as sustainable transport infrastructure, and an important local leisure asset. We would likely put forward towpath and access improvements to support the Cycleways network, and the wider cycling and walking network generally, to serve the increase in demand due to development, and support access to green and blue space.

Please feel free to contact me for any further information.

Kind regards,

Claire McLean MRTPI

Area Planner London

11th February 2020

CIL Draft Charging Schedule Consultation

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Submission by email to ldf@haringey.gov.uk

Dear Planning Policy Team

Partial Review of the Haringey CIL Charging Schedule. Submission of representations on behalf of Provewell

On behalf of our clients, Provewell we submit representations to the following consultation documents:

- Haringey CIL draft Charging Schedule November 2019
- CIL- Eastern Haringey Viability Update Study prepared by BNP Paribas October 2019

Our particular objection relates to the introduction of a CIL charge for Warehouse Living of £130 in the eastern part of the Borough and the inadequacy of the evidence base used to support and justify this CIL rate.

Planning guidance requires that a charging authority must use 'appropriate available evidence' to inform the preparation of their charging schedule.

The guidance confirms that a charging authority should draw on existing data wherever it is available; Land registry transactions, real estate market reports, real estate research, estate agents websites etc.

In addition the advice suggests that a charging authority should 'directly sample an appropriate range of types of sites across its area, in line with planning practice guidance on viability'.

The guidance encourages charging authorities deciding to set differential rates to undertake more fine-grained sampling to help them estimate the boundaries of differential rates.

It confirms that the collection of background data should together provide 'a

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robust evidence base' about the potential effects of the rates proposed, 'balanced against the need to avoid excessive detail'.

It also requires development costs to be taken into account when setting the levy rates and confirms that: '...a realistic understanding of costs is essential to the proper assessment of viability in the area'.

In the context of the above guidance Haringey Council has relied on the viability evidence produced by BNP Paribas. Having reviewed this evidence it is clear to my clients that BNP Paribas do not understand Warehouse Living, how it is evolving and developing as a use and how it operates. In addition and based on the content of their appraisal it is clear that they do not understand the site specific issues involved in bringing forward new Warehouse Living Developments.

Further no effort has been made to contact the landowning parties involved in the various emerging Warehouse Living sites situated in the east of the Borough and hence there is no 'fine grained' understanding of the specific issues facing the various sites.

As a result of the above the Council do not – in our view- have the 'robust evidence' required to support the CIL charge for Warehouse Living advanced in respect of the draft CIL charging schedule, nor can there be any understanding of the implications of the imposition of this CIL charge on the viability and hence sustainability of new emerging Warehouse Living schemes that will be being brought forward on our client's sites in the near future.

Our client, Provewell owns two sites in the eastern part of the CIL area, Overbury and Eade Roads and Arena Design Centre. These two sites comprise a number of existing warehouse buildings, which were originally used for a variety of industrial purposes. These industrial uses have over the years become occupied by a form of communal living and working, which has become known as 'Warehouse Living'.

Local Plan policy recognises that 'Warehouse Living', whilst being established in an incremental and largely unauthorised manner, now plays an important role in the Borough in terms of providing affordable living and working accommodation for young people and supporting and encouraging the growth of creative industries and SME businesses.

The majority of the space on each of the two sites has now become converted to Warehouse Living and the vast majority are in residential (Class C3)/ HMO use. A third of the space is still within commercial use.

All of the former industrial space that is utilised in the Warehouse District has involved conversion of existing buildings, no new floorspace has been constructed and under the CIL regulations would not have been CIL liable.

Analysis of the individual spaces that have been created within the existing warehouses shows a diverse range of uses and functions – bed spaces,

workspaces, communal space, shared kitchen spaces, storage space.

The way in which people occupy this space is also very diverse. Some live and work within the space, some just work and some live.

Analysis of existing occupancy in the Warehouse District, however reveals that the available space for each person, including both private bedroom space and the range of communal internal and external spaces typically exceeds the equivalent space that would be available in flat-share in a standard London Plan house or flat i.e. 20.7m² (warehouse living) vs 17.5 m² (two bedroom apartment).

The position within the warehouse district is developing and evolving. Some of the existing buildings are coming to the end of their life and need to be replaced. Policy, however, recognises the important role warehouse living plays in terms of supporting a young creative community and in providing affordable living and working accommodation and actively encourages owners to work with the Council to prepare masterplans for the future development of designated Warehouse District sites.

Given this context ProveWell is currently working with officers to produce a masterplanning framework within which existing older warehouse buildings will – over time- be replaced by new, purpose built warehouse living buildings. In developing the brief for new warehouse buildings the owners have come up with a building typology which combines: dedicated workspace, flexible live/work space; communal kitchen, dining and living spaces, bed spaces and internal and external communal spaces.

In terms of construction costs the new build typology is comparative with new build residential. Rental levels per person are, however, envisaged to remain comparable with the affordable rental figures set out in BNPP viability report and hence will remain a legitimate form of affordable housing for young people.

In addition and as part of the masterplanning framework process the owners are looking to invest substantive sums in the public realm and streets and spaces that comprise each site in order to transform the area from a place based traditionally on work to one that will be based around a mixed living and working community.

Given the above context – which is not appreciated at all in the BNPP viability work- we would advance the following detailed commentary in relation to the scope and context of the BNPP report and the assumptions made in relation to Warehouse Living:

1. Firstly there is no definition of Warehouse Living (WHL), which accurately defines and describes the use and the way it functions. As a starting point we say WHL is a combination of low-cost communal living accommodation and shared workspace areas. On this basis around 50% of the floorspace should

not incur any CIL charge. The effective rate of charge proposed as it applies to the residential element is therefore £260 psf which is clearly entirely out of kilter with other rates of charge.

2. The conflation with student accommodation reflects a deep misunderstanding of WHL. The two are not analogous. Student housing is characterised by small rooms, repeated floor plans and very high levels of internal space efficiency. WHL is loose-fit and, in effect, mixed use.

3. Student housing is management efficient. Low maintenance buildings and a homogeneous occupancy based on academic year lettings. Warehouse living is complex, inter-connected and maintenance heavy.

4. The financial inputs in the BNPP tables and appraisals are fanciful, as follows.

- Refurbishment costs are given as £30psf in Appx 9. This is a totally unrealistic assumption for the conversion of industrial/warehousing space into WHL. Based on work undertaken by Provewell in relation to a number of buildings confirms an average refurbishment rate in excess of £150 psf. Such refurbishment normally entails new roof; new window openings; internal sub-divisions; kitchens; bathrooms; all surfaces; fire safety including means of escape; heating installations; bins; bikes and lighting.
- Similarly, new build at £98.50 is woefully unrealistic. Our current emerging plans for two key sites in the Warehouse District are approaching £300 psf based on a modular build.
- Rent assumptions are confused. Bedroom rates are given as £700 per calendar month in the main report but jump to £800 pcm in Appx 9.
- Existing use rent for industrial is given as £4 psf. This is also unrealistic. The L&G crusader estate achieves circa £12psf and London industrial property has seen rapid rent rises and yield reductions over the last 2 years. Nor is there any recognition that in many cases the existing use on a number of redevelopment sites in the Warehouse District have established residential use and sui generis (HMO) use.
- The yield of 8.5% applied to existing use industrial rents is out of step with market norms. London industrial investment agents report that yield is now unlikely to exceed 5% for rack rented industrial estates within the M25, and frequently drop substantially lower.
- The proposed yield of 4.75% for WHL is not backed by any evidence. WHL is not a recognised asset class and, with few exceptions, does not exist beyond Overbury Road and the Arena sites. Build to rent and Student housing are traded in mature markets but WHL is an entirely new product with no institutional backing or involvement whatsoever. Consequently, it cannot be considered to attract such a low yield. Our

estimate is that 8% is more realistic but even then, may be optimistic given the absence of market knowledge or demand for such use.

In short – and based on the above commentary- we wonder whether BNPP have confused WHL with co-living, which is a very different product. Co-living rents are typically over £1100 per month and sales in this increasingly mature market have been reported at sub 5%.

In summary and based on the above commentary we would conclude that the proposed CIL rate for Warehouse Living in the Eastern Area of £130 per sqm advanced under table 1 cannot be substantiated and therefore cannot be taken forward and adopted.

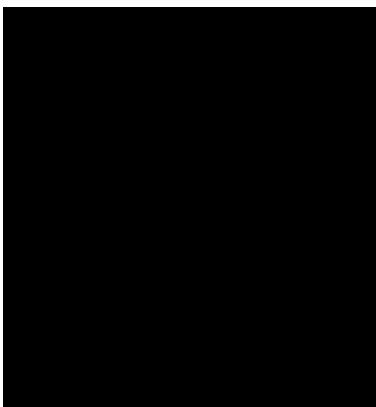
We would suggest that in order to come up with a robust figure requires much more in depth research and in this regard, we confirm that our clients would be happy to work with the Council to help develop this evidence base.

We confirm that we will be presenting evidence at any future Hearing and to be kept informed of progress.

Please do not hesitate to contact us if you require any further information

Yours sincerely

For Tibbalds Planning and Urban Design



Jennifer Ross
Consultant

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Direct dial: 020 7089 2131

Cc

Shulem & Ben
Chris Horn
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ProveWell
Chris Horn Associates
Dakota

Our ref: Q090614
Email: rebecca.burnhams@quod.com
Date: 11th February 2020



Haringey Council
Planning Policy, River Park House
225 High Road
London
N22 8HQ

ldf@haringey.gov.uk

Dear Sir / Madam,

PARTIAL REVIEW OF HARINGEY'S CIL CHARGING SCHEDULE – REPRESENTATIONS ON BEHALF OF TOTTENHAM HOTSPUR FOOTBALL CLUB

We are writing on behalf of Tottenham Hotspur Football Club (“THFC” or “the Club”) in response to the partial review of your CIL Charging Schedule.

The Club has been based in Tottenham since its formation in 1882 and is a major land holder and developer in the Tottenham area. Its world class stadium, which opened in 2019, and its associated development will act as a catalyst for the ongoing transformation of north Tottenham as a whole.

The Club has delivered a number of projects already including:

- **The Northumberland Development Project** – comprising the new stadium, the London Academy of Excellence Tottenham, retail, a hotel, 585 residential units, commercial floorspace, serviced apartments, and a community health building.
- **Northumberland Terrace** – a masterplan for the restoration of the historic terrace in conjunction with new build office / workshop space to the rear.
- **Percy House (796 High Road)** – renovation of Grade II* Percy House and its conversion into headquarter offices for the Club’s charitable Tottenham Hotspur Foundation.
- **Berland Court** – development of the Park Tavern public house adjacent to Northumberland Park train station comprising 34 affordable flats and a Jehovah’s Witness Kingdom Hall and small Club shop.
- **Cannon Road** – the redevelopment of the former Cannon Rubber Factory to provide 222 affordable homes and new buildings for Brook House Primary School.
- **500 White Hart Lane** – 145 new homes (including 29 affordable homes) and associated employment and retail/community floorspace. The affordable housing units were offered directly to Haringey Council in order to rehouse Love Lane Estate residents, rather than via an affordable housing provider.



Taken together these schemes amount to more than a £1bn direct investment in Tottenham by the Club. When all complete they will deliver nearly 1,000 new (including affordable) homes and have created thousands of new jobs.

These schemes are, however, only the first steps in the Club's commitment to the regeneration of Tottenham.

The Goods Yard site within the High Road West masterplan area was granted planning permission in June 2019 for the provision of up to 330 residential units, non-residential floorspace, refurbishment of the locally listed Station Master's House and public and private open space. A planning application for the adjoining site to the north, referred to as 867-879 High Road, is currently under consideration. Once approved, it will also deliver up to 330 units and a new park.

The Club is seeking to work positively with the Council throughout the charge setting, and subsequent implementation processes, to ensure that development in Haringey continues to be viable and deliverable.

The Club have worked with the Council for many years to ensure that the appropriate infrastructure is in place to support the regeneration of Tottenham and the positive approach the Council has taken in its plan allocations, particularly through the implementation of the High Road West masterplan which will provide a solid basis for delivering new homes, jobs and infrastructure that the area needs. However, the Club are concerned that the proposed CIL charges do not strike the appropriate balance between the need for infrastructure and the viability of development as required by the CIL Guidance. In particular, the Club is concerned that the proposed rates threaten the ability to develop sites that have been identified in the relevant plan, which goes against the CIL guidance ('the Guidance'):

*"Charging authorities should set a rate which does not threaten the ability to develop viably **the sites** and scale of development identified in the relevant plan (the Local Plan in England, Local Development Plan in Wales, and the London Plan in London)." (25-008-20140612) [emphasis added].*

In undertaking its Viability Assessment for CIL purposes the Charging Authority needs to undertake a proportionate, simple and transparent process consistent with the viability guidance. This should take into account development costs, particularly those for strategic sites and brownfield land and any site-specific requirements. (PPG: Paragraph: 020 Reference ID: 25-020-20190315).

It is critical that the Council ensures that charges are not set at a level which puts at risk the sites and scale of development set out in the Local Plan. In order to meet this test, the Council is required to prepare and publish viability evidence. This evidence should take an area-wide approach, but also, critically, it should consider strategic and brownfield sites. In considering the viability of these sites, Councils need to ensure that all development costs are taken into account.

The Partial Review of the Haringey CIL Charging Schedule proposes an increase to the residential CIL rate within the Eastern Charging Zone (where the High Road West masterplan area is located) from £15 to £50. In addition to this, the Partial Review proposes a new rate for Build to Rent development of £100.

Whilst the proposed increase to the residential rate is not likely in itself to make development unviable in strict terms, it must be considered cumulatively alongside other potential S106 obligations and other requirements. It is not apparent that in setting the CIL charging schedule appropriate consideration has been given to:

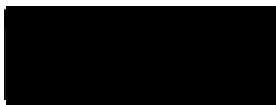
1. The various requirements for social and community infrastructure in the Tottenham Area Action Plan and whether these will be delivered through CIL or S106 obligations. Evidence presented at the Goods Yard Inquiry demonstrated a significant lack of clarity and it not evident that the CIL Charging schedule nor the supporting viability work has addressed this.
2. The Borough's and GLAs strongly expressed requirement for 35% affordable housing with a compliant housing mix. Despite planning policy allowing for lower proportions or affordable housing subject to robust viability evidence, as evidenced by recent Mayor of London Stage 1 reports, in practice attaining 35% is seen as politically important.

THFC are concerned that CIL rates will be increased without revised expectations on either of these matters thereby making the delivery of regeneration more challenging.

Given the importance of this issue to the delivery of housing in the local area, THFC reserve the right to attend any examination on the charging schedule and present further evidence

We trust that the enclosed comments are clear, however, please do not hesitate to contact me if you have any questions or require further information.

Yours sincerely



Rebecca Burnhams
Associate Director

cc. Richard Serra – Tottenham Hotspur Football & Athletic Co. Ltd

Haringey Council
Planning Policy
River Park House
225 High Road
London
N22 8HQ

11 February 2020
Reference CvO/0236

Dear Sir/Madam,

WRITTEN REPRESENTATIONS TO LB HARINGEY CONSULTATION ON THE DRAFT CIL CHARGING SCHEDULE

I write on behalf of our client, Starlow Holdings Ltd, to provide written representations following the publication of LB Haringey's Community Infrastructure Levy (CIL) Draft Charging Schedule for public consultation in the period to 11 February 2020.

Introduction

Our client is a landowner in the Borough and owns 38 Crawley Road, which is located within the 'Eastern' CIL charging zone. The site is allocated for redevelopment and over time our client will be bringing forward a mixed-use planning application for the site which will contribute to the delivery of housing land supply to meet identified housing needs. Therefore, the rate at which CIL is charged is of great importance to our client.

LB Haringey commissioned BNP Paribas to undertake a review of the residential and student accommodation CIL rates in the Eastern CIL Zone of the adopted CIL Charging Schedule as well as to consider a rate for Warehouse Living. The findings of the report are discussed below.

Policy Context

Paragraph 57 of the NPPF states that where up-to-date policies have set out the contributions expected from development, planning applications that comply with them should be assumed to be viable.

National Planning Practice Guidance¹ requires authorities to strike an appropriate balance between additional investment to support development and the potential effect on the viability of developments when deciding the CIL rates. Charging authorities should be able to show and explain how their proposed levy rates will contribute towards the implementation of their

¹ NPPG - Paragraph: 010 Reference ID: 25-010-20190901

relevant plan and support development across the plan area.

Proposed CIL Rates

Residential Rates

The current, adopted CIL Charging Schedule requires CIL to be paid on residential development in the east of the Borough at a rate of £15/sqm. The draft CIL Charging Schedule proposes to increase this rate to £50/sqm, representing an increase of 333.33%.

Our client objects to this considerable increase based on a number of errors within the evidence base.

Viability and Housing Delivery

Increasing the CIL rate chargeable on residential development schemes in the east of the Borough by 333.33% will have a significant impact on the viability of such schemes coming forward. The increased CIL rate will specifically have a considerable impact on the level of affordable housing that could viably be delivered across the Eastern CIL charging zone.

Recent planning decisions in LB Haringey make clear that the level of affordable housing delivered in major development schemes in the eastern charging zone is well below the LB Haringey policy level of 40%. The low level of delivery can be attributed to high land values, high build costs, S106 contributions, and relatively low end values. Recent examples of major residential development schemes that have been approved without providing policy compliant levels of affordable housing include:

- Strategic Development Partnership (SDP) Sites, reference: HGY/2018/2223 for 1,036 units. Permission was granted with an affordable housing provision of 25%. The viability assessment concludes that a 25% provision is in excess of what the proposed scheme can viably support and is therefore beyond the 'maximum reasonable' amount as defined in the London Plan.
- 38 Crawley Road, reference: HGY/2019/0938 for 29 units. This site is directly to the south of our client's site and benefits from the same site allocation. The agreed viability exercise demonstrated the maximum viable amount of affordable housing to be 19% by habitable room.
- 44-46 High Road, reference HGY/2018/1472. Allowed at appeal with 25% affordable housing provision.
- Berol Yard, reference: HGY/2017/2044 for 166 units. Granted with 8% affordable housing provision.
- Land rear of Plevna Crescent, reference: HGY/2017/2036 for 72 units. Granted with 20% affordable housing provision.
- Bernard Works, reference: HGY/2017/3584 for 99 units. Granted with 12% affordable housing provision.

Paragraph 3.14 of the Community Infrastructure Levy: Eastern Haringey Viability Update Study (CIL Study) confirms that, given the lack of a single threshold land value, it is difficult for policy makers to determine the minimum land value that sites should achieve. This will ultimately be a matter of judgment for each planning authority. Determining minimum land values introduces a certain amount of uncertainty that should also be reflected within the development appraisals.

The introduction of an increased CIL rate will further stifle the delivery of new housing in the Borough. The examples provided above demonstrate that residential schemes are already unable to viably deliver policy compliant levels of affordable housing with the CIL rate set of £15/sqm. The proposed rate of £50/sqm would further exacerbate issues with delivery of affordable housing. By increasing the CIL chargeable on residential developments, the Council will jeopardise the delivery of new housing and the opportunity to deliver affordable housing at levels compliant with policy requirements.

LB Haringey's Local Plan policy SP2 sets the target of providing 40% affordable housing on sites capable of delivering 10 or more units. With the delivery of affordable housing a core objective of both the Local Plan and National Planning Policy, the regeneration objectives of LB Haringey's Local Plan will be significantly compromised by the proposed increase.

Comparable Sites

The site immediately to the south of our client's site has recently received a resolution to grant planning permission at committee (ref: HGY/2019/0938). The scheme's viability has been assessed in a supporting Affordable Housing and Viability Statement which concluded that the provision of any affordable housing on site would generally exceed the level which can viably be supported by the scheme. The level of affordable housing delivered on the site, 19%, represents the maximum reasonable level of provision which can be supported by the scheme. This position was agreed by LB Haringey's independent assessment.

In resolving to grant planning permission, the committee accepted that the scheme could not deliver policy compliant levels of affordable housing. This site is very similar in character to our client's site in the same location and being previously industrial land. It is therefore important to note this scheme at the lower CIL rate could only deliver 19% affordable housing and therefore the proposed increase in CIL will detrimentally impact the viability of any scheme on our client's site.

Conclusions

It is essential that the introduction of the revised CIL charge will not prevent development coming forward.

The introduction of a CIL charge would affect the deliverability of new residential schemes

promoted through prevailing policy and hamper the quality of such spaces in key regeneration areas in the borough. Further eroding the viability and potential for new residential schemes coming forward conflicts with the core objectives of both local and national planning policy.

Therefore, our client objects to the proposed raised in CIL charges for residential floorspace in the eastern district as this will act contrary to the objectives of the development plan in terms of viability and affordable housing targets.

Yours faithfully,

Collective Planning

REPORT FOR CONSIDERATION AT PLANNING SUB-COMMITTEE

1. APPLICATION DETAILS

Reference No: HGY/2019/0938

Ward: West Green

Address: Frankum & Kaye Ltd, 38 Crawley Road, N22 6AG

Proposal: Demolition of existing buildings and erection of two part-three part-four storey residential blocks and a row of three-storey terraced houses (total of 29 units) and provision of a pedestrian/cycle link connecting Crawley Road to Downhills Way, plus landscaping, cycle and car parking, and other associated works.

Applicant: Mr Highfield

Ownership: Private

Case Officer Contact: Christopher Smith

Site Visit Date: 10/04/2019

Date received: 29/03/2019 **Last amended date:** 06/06/2019

Drawing number of plans:

WDG-519-A-ZZ-D-A-2001 Rev. P2, 2002 Rev. P2, 2102 Rev. P3;
WDG-519-B-XX-D-A-2001 Rev. P6, 2101 Rev. P8;
WDG-519-B-ZZ-D-A-2002 Rev. P6;
WDG-519-S-00-D-A-9010 Rev. P8, 01-D-A-9011 Rev. P4, 02-D-A-9012 Rev. P4, 03-D-A-9013 Rev. P4;
WDG-519-S-GF-D-A-7001 Rev. P3, GF-D-A-7002 Rev. P3, RF-D-A-9014 Rev. P4;
WDG-519-S-XX-D-A-0101 Rev. P1, 0401 Rev. P1, 0402 Rev. P1, 0410 Rev. P1, 0411 Rev. P1, 2101 Rev. P3, 2111 Rev. P2;
WDG-519-S-XX-DR-A-2110 Rev. P2;
WDG-519-HT1-XX-D-A-2001 Rev. P5, 2101 Rev. P3, HT2-XX-D-A-2001 Rev. P2, 2101 Rev. P1;
RFM-XX-00-DR-L-0001 Rev. PL02, 0004 Rev. PL02, 0007 Rev. PL02, 0009 Rev. PL02, 8001 Rev. PL01, 8002 Rev. PL01, 8003 Rev. PL01;
RFM-XX-00-RP-L-0001 Rev. PL02;
3534-SK08 Rev. P1; SK09 Rev. P1;
18165-01-008;
3534-DS-101 Rev. P2, 102 Rev. P2;
180151-E-EX-01.

Supporting documents also assessed:

Design and Access Statement (Rev. P4), Schedule of Accommodation (Rev. E), Options for De-Culverting document (Rev. B, dated 16/5/2019), Transport Statement dated June 2019, Environmental Addendum dated June 2019, Affordable Housing & Viability Statement dated March 2019, Access Arrangements note dated May 2019, Letter dated 2nd September 2019 from DOA Consulting Structural Engineers, Letter from Birketts LLP dated 1st March 2019, Planning Statement, Flood Risk Assessment and Sustainable Surface Water Strategy, Desk Study Report, External Lighting Report, Noise Assessment, Daylight Assessment, Overheating Assessment, Air Quality Assessment, Energy Statement, Sustainability Statement, Arboricultural Impact Assessment Survey & Report, Statement of Community Involvement, Daylight Sunlight Addendum.

- 1.1 This application is being reported to the planning committee as it is a major application recommended for approval.

1.2 SUMMARY OF KEY REASONS FOR RECOMMENDATION

- The application site forms part of a designated Site Allocation (SA60) in the Council's Site Allocation Development Planning Document (DPD) 2017. The part of the site allocation to which this proposal relates includes buildings that are in a poor condition. The surrounding area is predominantly residential in character.
- Demolition of the existing buildings and the construction of a wholly residential development is acceptable in principle (the site allocation does not require replacement employment space). The proposal would also provide a new east-west pedestrian and cycle connection across the site, which is also a requirement of the primary objectives of Site Allocation SA60.
- The development would provide 19% on-site affordable housing by habitable room in the form of 5 flats for affordable rent and 2 flats for shared ownership, which is an accepted tenure split, all within Block A. In addition it provides an off-site contribution of £230,000 which would assist the Council with its own affordable housing programme.
- The development would be of a high-quality contemporary design of an appropriate size and scale that would improve the visual quality of the local built environment.
- The development would provide high-quality living accommodation for residents, including an appropriate size and mix of units plus adequate private amenity space areas, whilst 10% of the flats would be adaptable for wheelchair users.

- The development would not have a material adverse impact on the amenity of adjoining occupiers in terms of a loss of sunlight and daylight, outlook, or privacy, nor in terms of excessive noise, light or air pollution.
- The Moselle Brook is just outside the application site. De-culverting has been considered but not to be achievable in this case, as supported by the Environment Agency; the applicant does not have control over it.
- The development would provide an appropriate quantity of car and cycle parking spaces for this location, and would be further supported by sustainable transport initiatives.
- The development would provide appropriate carbon reduction measures plus a carbon off-setting payment, as well as site drainage and biodiversity improvements.
- The application is considered acceptable for all other reasons as described below.

2. RECOMMENDATION

- 2.1 That the Committee resolve to GRANT planning permission and that the Head of Development Management or Assistant Director of Planning is authorised to issue the planning permission and impose conditions and informatives subject to the signing of a Section 106 Legal Agreement providing for the obligations set out in the Heads of Terms below.
- 2.2 That the section 106 legal agreement referred to in resolution (2.1) above is to be completed no later than 4th November 2019 or within such extended time as the Head of Development Management or the Assistant Director of Planning shall in her/his sole discretion allow; and
- 2.3 That, following completion of the agreement(s) referred to in resolution (2.1) within the time period provided for in resolution (2.2) above, planning permission shall be granted in accordance with the Planning Application subject to the attachment of the conditions; and
- 2.4 That delegated authority be granted to the Assistant Director of Planning/Head of Development Management to make any alterations, additions or deletions to the recommended heads of terms and/or recommended conditions as set out in this report and to further delegate this power provided this authority shall be exercised in consultation with the Chairman (or in their absence the Vice-Chairman) of the Sub-Committee.

Conditions

- 1) Three years
- 2) Drawings
- 3) Materials
- 4) PD restrictions
- 5) Boundary treatments and access controls
- 6) Adaptable dwellings
- 7) Satellite antenna
- 8) Landscaping
- 9) Lighting
- 10) Boilers 1
- 11) Boilers 2
- 12) Air quality and dust management plan
- 13) Considerate contractor
- 14) Non-road mobile machinery
- 15) Machinery emissions
- 16) Land contamination
- 17) Land contamination remediation
- 18) Construction management and logistics
- 19) Car parking management plan
- 20) Cycle parking
- 21) Electric vehicle charging
- 22) Delivery and servicing plan
- 23) Green roof
- 24) Culvert condition review
- 25) Foundations
- 26) Secured by design
- 27) Obscure glazing
- 28) Drainage management
- 29) Biodiversity
- 30) Energy efficiency
- 31) PV panels
- 32) Overheating
- 33) Noise levels

Informatives

- 1) Proactive working
- 2) CIL
- 3) Legal agreements
- 4) Numbering
- 5) Asbestos
- 6) Construction hours
- 7) Environmental permit
- 8) Groundwater risk management
- 9) Water pressure

Section 106 Heads of Terms:

1) Affordable Housing Provision

- 7 affordable housing units (19% by habitable room)
- 5 affordable rent units and 2 shared ownership units
- £230,000 financial contribution towards additional affordable housing

2) Play Space Contribution

- £11,115 towards the enhancement/upkeep of local play space

3) Sustainable Transport Initiatives

- Car Club Scheme
 - Two years free membership
 - £50 credit to every new resident (max. two per dwelling)
- Residential Travel Plan
 - Appointment of a travel plan co-ordinator for five years
 - Provision of welcome induction packs (containing public transport and cycling/walking information, including details of nearby bus/rail/tube services, map and timetables) to every new resident
 - Implementation of measures to use reasonable endeavours to achieve 8% cycle mode share by the 5th year
 - Monitoring contribution (£3,000)

4) Section 278 Highways Agreement

- Includes, but is not limited to, the following:
 - Footway improvement works
 - Provision of access to the public highway
 - Street furniture relocation
 - Carriageway markings
 - Appropriate access and visibility safety provision

5) Carbon Mitigation

- Post-occupation Energy Statement review
- Contribution for carbon offsetting (£54,410.40), or more if required by Energy Statement review

6) Public Realm and Link to Lordship Recreation Ground

- To pay a Public Realm Contribution of £35,000 upon commencement of works on site to pay for the necessary public realm works for connecting the pedestrian/cycle route to the level crossing on Downhills Way.
- Works will include:
 - i. Pedestrian/cycle pathway infrastructure construction from east of site to Downhills Way crossing;
 - ii. Landscape verge improvements on land between the site and Downhills Way adjacent to new pedestrian/cycle route;
 - iii. Visibility safety requirements.
- A Road Safety Audit will be undertaken in support of the proposed connection

7) Employment Initiatives – Local Training and Employment Plan

- Provision of a named Employment Initiatives Co-Ordinator
- Notify the Council of any on-site vacancies
- 20% of the on-site workforce to be Haringey residents
- 5% of the on-site workforce to be Haringey resident trainees
- Provide apprenticeships at one per £3m development cost (max. 10% of total staff)
- Provide a support fee of £1,500 per apprenticeship towards recruitment costs

8) Monitoring Contribution

- 5% of total value of contributions (not including monitoring)
- £500 per non-financial contribution
- Total monitoring contribution to not exceed £50,000

Total Contributions (minimum): £330,500

- 2.4 In the event that members choose to make a decision contrary to officers' recommendation members will need to state their reasons.
- 2.5 That, in the absence of the agreement referred to in resolution (2.1) above being completed within the time period provided for in resolution (2.2) above, the planning permission be refused for the following reasons:
1. The proposed development, in the absence of a legal agreement securing the provision of on-site affordable housing, would fail to provide much needed affordable housing stock within the Borough and would set an undesirable precedent for future similar planning applications. As such, the proposal is contrary to Policy SP2 of the Council's Local Plan 2017 and Policy 3.12 of the London Plan 2016.

2. The proposed development, in the absence of a legal agreement to work with the Council's Employment and Skills team would fail to support local employment, regeneration and address local unemployment by facilitating training opportunities for the local population. As such, the proposal is contrary to Local Plan 2017 Policies SP8 and SP9.
 3. The proposed development, in the absence of a legal agreement to secure planning obligations for mitigation measures to promote sustainable transport, by reason of its lack of car parking provision would significantly exacerbate pressure for on-street parking spaces in surrounding streets, prejudicing the free flow of traffic and conditions of general safety along the neighbouring highway and would be detrimental to the amenity of local residents. As such, the proposal is contrary to Policy 6.13 of the London Plan 2016, SP7 of the Local Plan 2017 and Policy DM32 of the Development Management Development Plan Document 2017.
 4. The proposed development, in the absence of a legal agreement securing sufficient energy efficiency measures and/or financial contribution towards carbon offsetting, would result in an unacceptable level of carbon dioxide emissions. As such, the proposal would be contrary to Policies 5.2, 5.3 and 5.7 of the London Plan 2016, Local Plan 2017 Policy SP4 and Policy DM21 of the Development Management Development Plan Document 2017.
 5. The proposed development, in the absence of a legal agreement to secure works to the public highway and other public realm improvements including the connection through the application site to Downhills Way, would have an unacceptable negative impact the visual amenity of the area and the operation of the public highway, and would fail to meet the requirements of Site Allocation SA60. As such, the proposal would be contrary to Policies DM1 and DM33 of the Development Management DPD 2017, Policy 7.5 of the London Plan 2016, and the aims and objectives of SA60 of the Site Allocations DPD.
- 2.6 In the event that the Planning Application is refused for the reasons set out in resolution (2.5) above, the Head of Development Management (in consultation with the Chair of the Planning Sub-Committee) is hereby authorised to approve any further application for planning permission which duplicates the Planning Application provided that:
- i. There has not been any material change in circumstances in the relevant planning considerations, and
 - ii. The further application for planning permission is submitted to and approved by the Assistant Director within a period of not more than 12 months from the date of the said refusal, and
 - iii. The relevant parties shall have previously entered into the agreement contemplated in resolution (1) above to secure the obligations specified therein.

CONTENTS

- 3.0 PROPOSED DEVELOPMENT AND SITE LOCATION DETAILS
- 4.0 CONSULTATION RESPONSE
- 5.0 LOCAL REPRESENTATIONS
- 6.0 MATERIAL PLANNING CONSIDERATIONS
- 7.0 RECOMMENDATION

APPENDICES:

- Appendix 1: Consultation Responses
- Appendix 2: Plans and Images
- Appendix 3: Quality Review Panel Notes
- Appendix 4: Development Management Forum Notes

3.0 PROPOSED DEVELOPMENT AND LOCATION DETAILS

3.1 Proposed development

- 3.1.1 This application is for full planning permission for the demolition of the existing vehicle repair and service buildings and erection of 29 residential units within two part-three part-four storey blocks and a row of terraced houses. Seven of these units would be affordable in the form of 5 affordable rent and 2 shared ownership. 16 car parking and 56 cycle parking spaces are also proposed.
- 3.1.2 The development would provide a new landscaped connection through the site for pedestrians and cycles, connecting Crawley Road with Downhills Way.
- 3.1.3 The development would be predominantly finished in yellow brickwork, with grey horizontal feature banding to Block B, plus grey metal balconies and window frames. The roof coping to the houses would be finished in metal. Entrances and garaging would be finished with timber-effect cladding.

3.2 Site and Surroundings

- 3.2.1 The application site is 0.26 hectares in area and broadly rectangular in shape. It is located at the eastern end of Crawley Road and is to the west of Downhills Way. It is bordered to the north by fencing just beyond which is a culverted watercourse (Moselle River) and a single storey storage building. The site adjoins the Barber, Wilsons and Co. commercial ltd building to the south, as well as a residential property fronting Downhills Way.
- 3.2.2 The wider surroundings include two storey residential properties to the north, east and west, with commercial premises located to the north and south.
- 3.2.3 Lordship Recreation Ground is located a short walk to the east, across Downhills Way.
- 3.2.4 The site is not located in a conservation area and the buildings on site are neither statutorily nor locally listed.

3.3 Relevant Policy Designations

- 3.3.1 The application site forms the central part of site allocation SA60 in the Site Allocations DPD, which identifies this part of the site as suitable for residential development. The site allocation aims to create a „link“ through to Lordship Recreation Ground as well as potentially facilitating the de-culverting of the Moselle Brook.
- 3.3.2 The site is within Flood Zone 1 which equates to a low risk of flooding. It is also adjacent to part of the Blue Ribbon Network (Moselle Brook). The site is within a

Controlled Parking Zone (Belmont). It has a maximum public transport accessibility level (PTAL) of 3 (medium).

3.4 Relevant Planning History

3.4.1 The property known as 38 Crawley Road, which includes the application site, the bakery site to the north and the miscellaneous commercial units to the south, has an extensive planning history of minor applications but nothing of relevance that would affect the assessment of this planning application.

The following planning applications have been submitted on the application site since 2000:

HGY/2012/2129. Addition of MOT Testing facilities to existing garage operations. Granted December 2012.

4. CONSULTATION RESPONSE

4.1 Quality Review Panel (QRP)

4.2 The proposal was presented to the QRP on 26th September 2018 and 30th January 2019. The Panel's comments from the most recent meeting are summarised as follows:

4.3 *"The planning of the scheme seems very well ordered, and the nature and clarity of the central space is welcomed. Scope for improvement remains within the layout and configuration of the eastern section and „knuckle“ of Block B in order to improve the entrance, circulation arrangements and cycle storage for the flats, in addition to minimising the amount of blank frontage at ground floor. Exploring a different typology of units in this location may be helpful. The western end of Block A would also benefit from additional work to improve the generosity of the amenity space to the rear."*

4.4 The Panel's comments are repeated in full in Appendix 3. An indication of how their key comments have been met are provided in a table form within the design section below.

4.5 Development Management Forum (DMF)

4.6 The DMF was held on 26th November 2018. During the meeting comments were raised in respect of the following points. These are set out in more detail in Appendix 4:

- Detailed design
- Height
- Density
- Layout

- Tenure
- Landscaping
- Masterplanning
- Site ownership
- Employment uses
- Pedestrian link
- Vehicle access and highway safety
- Parking
- Construction works
- Impact on neighbouring properties
- Public consultation

4.7 The following were consulted regarding this planning application:

4.8 INTERNAL

4.9 Design Officer

4.10 Comments provided are in support of the development.

4.11 Transportation

4.12 No objections raised, subject to conditions and section 106 legal clauses.

4.13 Housing

4.14 Support the scheme design and affordable housing offer.

4.15 Drainage Engineer

4.16 No objections raised.

4.17 Carbon Management

4.18 The development is acceptable, subject to conditions

4.19 Pollution

4.20 No objections, subject to conditions.

4.21 Waste Management

4.22 Indicate support for the proposed development.

4.23 Regeneration

- 4.24 No comments made.
- 4.25 Economic Development
- 4.26 No objections raised.
- 4.27 Nature and Conservation
- 4.28 No comments made.
- 4.29 Noise Specialist
- 4.30 No objections are raised in respect of noise or lighting.
- 4.31 Emergency Planning
- 4.32 No objections raised.
- 4.33 EXTERNAL
- 4.34 Financial Viability Assessment (Valuer)
- 4.35 The proposed development can viably support the provision of seven affordable units and provide a surplus of £39,631.
- 4.36 Environment Agency
- 4.37 Initially raised an objection due to a lack of supporting information.
- 4.38 Additional documentation was thereafter provided by the applicant. After further analysis the objection has been withdrawn and there is now support for the application subject to conditions.
- 4.39 Thames Water
- 4.40 No objections raised, subject to conditions.
- 4.41 London Fire Service
- 4.42 Satisfied with the proposals.
- 4.43 Metropolitan Police
- 4.44 No objections, subject to conditions.

5. LOCAL REPRESENTATIONS

5.1 The following were consulted:

- 148 neighbouring properties;
- Local neighbourhood groups, including Friends of Lordship Rec;
- Public notices were erected in the vicinity of the site.

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

5.3 Responses from individual addresses (20)

- 18 in Objection
- 1 in Support
- 1 „Comment“

5.4 The following local groups/societies made representations:

- None.

5.5 The following local representatives also commented:

- None

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

Land Use, Employment and Housing

- Lack of employment space
- Lack of community facilities
- Insufficient affordable housing provision

Size, Scale and Design

- Excessive height and scale
- Inappropriate detailed design
- Overdevelopment of the site
- Out of keeping with local character
- Loss of openness

Parking, Transport and Highways

- Main vehicle access is in an inappropriate location
- Pedestrian crossing must be fully assessed
- Parking spaces are poorly located
- Difficult access to and from residential garages

- Insufficient parking provision
- Increased road congestion
- Lack of detail over site entrance access controls
- Loss of local road safety
- No consideration of electric vehicle installations

Residential Amenity

- Excessive overshadowing
- Increased overlooking
- Increased air pollution
- Loss of day/sunlight
- Increased noise
- Increased sense of enclosure
- Existing building contains asbestos
- Disturbance from construction works
- Increased anti-social behaviour

Park, Environment and Public Health

- Loss of wildlife
- Conflict with existing commercial operations

5.7 The following issues raised are not material planning considerations:

- Loss of a view
- Lack of engagement with local residents and their views
- Lack of consultation of adjoining businesses

6 MATERIAL PLANNING CONSIDERATIONS

6.1.1 The main planning issues raised by the proposed development are:

1. Principle of the Development
 - Policy Framework
 - Site Allocation
 - Land Use Principles
 - Masterplanning
2. Housing Provision and Affordable Housing
 - Affordable Housing and Mix
 - Housing Mix
3. Detailed Design
 - Density
 - Character and Appearance
4. Layout and Residential Quality
5. Impact on Neighbouring Amenity

6. Parking and Highways
7. Waterway Impact and Water Management
8. Sustainability and Biodiversity
9. Air Quality and Land Contamination
10. Employment
11. Fire Safety
12. Section 106 mitigation

6.2 Principle of the development

6.2.1 Policy Framework

6.2.2 This planning application is for the demolition of the existing vehicle repair and service buildings and erection of 29 residential units within two blocks of flats and a row of terraced houses.

6.2.3 The following strategic policies are of relevance in assessing this application.

6.2.4 *National Policy*

6.2.5 The National Planning Policy Framework 2019 (NPPF) establishes overarching principles of the planning system, including the requirement of the system to „drive and support development“ through the local development plan process and support „development proposals that accord with the development plan without delay“. The NPPF also expresses a „presumption in favour of sustainable development which should be seen as a golden thread running through both plan-making and decision-taking.“

6.2.6 The NPPF encourages the „effective use of land by reusing land that has been previously developed“. In respect of applications that include provision of housing, the NPPF highlights that delivery of housing is best achieved through larger scale development.

6.2.7 *The Development Plan*

6.2.8 For the purposes of S38(6) of the Planning and Compulsory Purchase Act 2004 the Development Plan consists of the London Plan (consolidated 2016), Haringey’s Local Plan (consolidated 2017), the Development Management Policies DPD (2017) and the Site Allocations DPD (2017). The draft new London Plan is also material.

6.2.9 The planning decision must be made in accordance with the development plan unless material considerations indicate otherwise.

6.2.10 *Regional Policy*

6.2.11 The consolidated London Plan (2016) sets out objectives for development through a range of planning policies. The policies in the London Plan are accompanied by a suite of Supplementary Planning Guidance (SPGs) documents that provide further guidance and policy advice.

6.2.12 The draft London Plan has recently been subject to examination and is currently a limited material consideration in the assessment of planning applications.

6.2.13 Local Policy

6.2.14 In 2017 Haringey's Local Plan Strategic Policies document was updated to reflect the increasingly challenging borough-wide housing and affordable housing targets of 19,802 and 7,920 homes respectively.

6.2.15 The Site Allocations Development Plan Document 2017 gives effect to the Local Plan spatial strategy by allocating sites to accommodate the development needs of the borough. Developments within allocated sites are expected to conform to the guidelines of the relevant allocation unless there is strong justification for non-compliance.

6.2.16 The Development Management Development Plan Document 2017 (DMDPD) supports proposals that contribute to the delivery of the planning policies referenced above and sets out its own criteria-based policies against which planning applications will be assessed.

6.2.17 Site Allocation

6.2.18 The application site is positioned to the south of the (culverted) Moselle Brook, to the north of the Barber, Wilsons and Co. employment building, to the west of Downhills Way and to the east of Crawley Road. The site forms the central part of site allocation SA60 (Barber Wilson) as indicated by the Site Allocations DPD. Large parts of the site allocation are located to the north and south of the application site but do not form part of this application.

6.2.19 The site allocation envisages the provision of residential development to replace the existing employment activities and the creation of an improved green grid link between Wood Green and Tottenham through Lordship Recreation Ground, with the de-culverting of the Moselle Brook also a requirement of development, if this is achievable.

6.2.20 The site-specific requirements of SA60 are as follows:

- Indicative development capacity of 66 residential units;
- Provision of a site-wide masterplan in accordance with Policy DM55;
- Retention of the original Barber, Wilsons & Co. building, and in its current use if possible [outside of this application site]

- Provision of a link from Crawley Road to Lordship Recreation Ground;
- Residential development is permitted to enable creation of this link;
- Planning obligations are required to facilitate connection with Lordship Rec over Downhills Way;
- Have regard to delivering the objectives of the Thames River Basin Plan.

6.2.21 In addition, the following relevant development guidelines also apply to SA60:

- Development should not be overbearing on surrounding neighbouring properties. Where the site interfaces with residential properties, back gardens of new units should meet back gardens of existing properties;
- Development should respect the amenity of residents on Downhills Way;
- The two yards between 145 and 147 Downhills Way should be built on, keeping the existing building line, and in a consistent manner to the existing buildings;
- Limited development to the south of 125, and north of 113 Downhills Way, to create a corner block which is sensitive to adjoining residential properties but also marks the entrance to the through route;
- The Moselle river runs in a culvert along the eastern boundary of the site. The opportunity to de-culvert this should be explored in line with SP5;
- In accordance with Policy SP9, if development results in a net loss of employment floorspace a financial contribution may be required;
- Land contamination studies should take place prior to any development;
- A piling statement will be required prior to any piled foundations, if required;
- A flood risk assessment is required for any development.

6.2.22 The proposed development should be in general accordance with these adopted objectives unless material considerations dictate otherwise. These matters will be assessed in the relevant sections below.

6.2.23 Land Use Principles

6.2.24 The proposed development would replace the existing vehicle repair and service buildings (Use Class Sui Generis) with a residential development (Use Class C3).

6.2.25 *Demolition of Existing Buildings*

6.2.26 The scheme proposes demolition of all existing buildings within the application site. The existing buildings on the site are of limited architectural value and are not locally or statutorily listed. The demolition of the existing buildings is therefore considered to be acceptable in principle.

6.2.27 *Loss of Employment Activities*

- 6.2.28 Policy 4.4 of the London Plan 2016 states that the Mayor and boroughs should plan, monitor and manage the release of surplus industrial land so that it can contribute to strategic and local planning objectives, such as providing more housing.
- 6.2.29 Site Allocation SA60 identifies the site for residential development, with no restriction on employment other than the retention of the Barber Wilson building (next door). Policy SA2 of the Site Allocations DPD does not formally designate the application site as suitable for long-term retention of employment activities. The supporting text to this policy states that Haringey contains a number of areas where the employment stock is no longer suitable or viable for the use it was originally built for. It also indicates that the expected renewal of formally protected employment sites will enable the release of less strategically-located sites for residential use.
- 6.2.30 Local Plan Policy SP8 states that the Council will protect employment land, including non-designated employment sites where these are viable. Policy DM40 has similar aims. However the site allocation is given greater weight as its specific to this site.
- 6.2.31 The application site includes single storey buildings and an associated yard area that appear to have been in use as a vehicle works and servicing business since the 1960s. In planning policy terms the site is not formally designated for long-term retention in employment uses. Strategic planning policies referred to above, particularly Policy SP2 and Site Allocation SA60, identify this site as suitable for employment land release due to its relatively low accessibility to public transport, location in a predominantly residential area and given the age and condition of the existing buildings on site.
- 6.2.32 Policy DM40 Part B includes a list of criteria (a-e) against which a site's suitability and viability for continued employment use is assessed, which includes periods of vacancy, age of building, neighbouring uses etc.
- 6.2.33 The substantial age, use-specific layout and single storey height of the buildings on site would restrict future uses to basic vehicle works or storage activities without significant refurbishment or demolition. The wider surrounding area is predominantly residential, and the site has vehicle accesses at both the western and eastern ends which provide ideal entrance and exit points for a pedestrian and cycle connection from the existing residential zone to Lordship Recreation Ground – a key objective of the site allocation, and the reasoning behind it.
- 6.2.34 Although the site is not currently vacant the applicant has stated that it is surplus to the requirements of the existing tenants. It is understood that the tenants have been searching for an alternative location for some time and intend to relocate the business to another premises once development is commenced. Due to its current occupation no marketing of the site has taken place.

6.2.35 Therefore, despite the current occupancy of the site and lack of marketing evidence, it is considered that the age, scale and layout of the buildings on site, and its location in a generally residential area, means that the site is better suited for residential purposes in the long-term.

6.2.36 In accordance with DM40 the applicant has agreed to provide employment and training initiatives for local people during the construction phase.

6.2.37 In summary, it is considered that the loss of employment floorspace on this portion of the site with a residential development is acceptable in principle.

6.2.38 Provision of Residential Units

6.2.39 London Plan Policy 3.3 recognises there is a pressing need for more homes in London and Policy 3.4 states that housing output should be optimised given local context. It sets a target for Haringey of 15,019 homes to be provided during the plan period and prior to 2025. This target is set to increase with the adoption of the draft London Plan. Draft London Plan Policy H1 sets a target of 19,580 net completions of homes in the draft Plan period of 2019/20 to 2028/29. This yields an annualised target for Haringey of 1,958 homes.

6.2.40 Policy DM10 of the DMDPD states that the Council will support proposals for new housing on sites allocated for residential development.

6.2.41 The site allocation SA60 has an indicative development capacity of 66 residential units. The application site covers approximately one-third of the site allocation area and proposes 29.

6.2.42 The residential units forming part of this development would contribute proportionally towards the Council's overall housing targets in a sustainable and appropriate location and is considered acceptable in principle. This is clearly reinforced by Site Allocation SA60 which specifically states that residential land use on the site is acceptable.

6.2.43 Land Uses – Conclusion

6.2.44 The proposed development is considered acceptable in land use terms, subject to other elements of the scheme also being acceptable including the provision of affordable housing, impact on local character and appearance, impact on neighbouring residents, housing quality, transport and highways matters, and all other relevant considerations.

6.2.45 Masterplanning

- 6.2.46 Policy DM55 requires applicants to prepare an indicative masterplan where development forms only part of a larger site allocation, in order to demonstrate that the proposal would not prejudice potential development on the remaining areas of the site allocation and other relevant sites nearby.
- 6.2.47 The application site area covers approximately one-third, and is the central part, of the site allocation SA60. The Design and Access Statement submitted with this application contains a masterplan for SA60 that indicates development of a similar size and scale to that presented as part of this proposed development could be built on both the northern and southern „thirds“ of the site allocation. This is subject to further detailed design, without adversely prejudicing the layout and residential quality of the proposed scheme or existing neighbouring amenity.
- 6.2.48 The masterplan also indicates how the site allocation objectives outside of the application site could be met, including the retention of some commercial activities on the site within the northern and southern development parcels, retention of the Barber, Wilsons & Co. building in commercial use and the infilling of the yard space between 145 and 147 Downhills Way with residential properties.
- 6.2.49 The key site allocation requirement for a pedestrian and cycle connection from Crawley Road over Downhills Way and through to Lordship Recreation Ground would be provided as part of this proposed development.
- 6.2.50 As such, it is considered that the applicant has submitted a workable and logical indicative masterplan that accords with the requirements of Policy DM55 and is therefore acceptable.

6.3 Housing Provision and Affordable Housing

6.3.1 Affordable Housing and Mix

- 6.3.2 London Plan Policy 3.12 states that boroughs should seek the maximum reasonable amount of affordable housing for residential developments.
- 6.3.3 Local Plan Policy SP2 requires developments of more than 10 units to provide a proportion of affordable housing to meet an overall borough-wide target of 40%, based on habitable rooms, with tenures split at 60:40 for affordable (and social) rent and intermediate housing respectively. Policy DM13 of the DMDPD reflects this approach and confirms that the preferred affordable housing mix is as set out in the Council’s latest Housing Strategy.
- 6.3.4 The Mayor of London’s Affordable Housing and Viability (AHV) SPG states that all developments not meeting a 35% affordable housing threshold should be assessed for financial viability through the assessment of an appropriate financial appraisal, with early and late stage viability reviews applied where appropriate.

6.3.5 Viability Review

6.3.6 The applicant's initial affordable housing offer was for all 7 flats within Block A to be affordable properties with a tenure split of 5 intermediate units in either shared ownership or intermediate rent, plus 2 units at London affordable rent. This initial offer constitutes 19% affordable housing by habitable room (24% by unit).

6.3.7 The applicant's *Affordable Housing & Viability Statement* (AHVS) was independently assessed by District Valuer Services (DVS) and it was found that 7 affordable units is the maximum the development can viably provide. The response from DVS found that a surplus financial contribution of circa £39,000 was available.

7.1.1 Negotiations have since taken place between the applicant and officers, with the objective of improving the affordable housing offer as far as possible. The affordable mix has been amended so that five of the affordable units (71%) would be in affordable rented tenure and two (29%) would be in shared ownership tenure. This more closely matches the Council's stated policy objective for more rented units.

7.1.2 The applicant has also offered a financial contribution of £230,000 towards the provision of affordable housing off-site, calculated on the basis of potential uplift in values by the time the development is built (effectively, pre-empting a positive post-permission viability review). This contribution would be pooled to partially contribute towards the provision of one thousand social rented homes within Haringey. Housing officers have welcomed this.

7.1.3 The affordable housing provision is summarised in the table below:

<i>Unit Type/Location</i>	<i>No. of Units</i>	<i>No. of Hab. Rooms Overall</i>	<i>Aff. Units (% of Total by Hab. Room)</i>
Block A (Affordable)	7	22	19%
1 bed – Affordable Rent	2		
2 bed – Affordable Rent	2		
2 bed – Shared Ownership	1		
3 bed – Shared Ownership	1		
4 bed – Affordable Rent	1		
Block B (Market)	12	36	0%
Houses (Market)	10	58	0%
Total	29	116	19%

sal presents a range of affordable unit sizes and a suitable split of tenures.

7.1.5 This amended affordable housing tenure split plus the provision of a much larger off-site financial contribution is considered a significant improvement on the original affordable housing offer and above the maximum viable level of affordable housing provision as indicated by the independent viability assessment.

7.1.6 Therefore, it is considered that the affordable housing provision together with the financial contribution meets policy requirements.

7.1.7 Housing Tenure and Mix

7.1.8 Policy 3.8 of the London Plan 2016 states that Londoners should have a genuine choice of homes that they can afford. To this end the policy recommends that new developments offer a range of housing choices.

7.1.9 Policy DM11 requires proposals for new residential development to provide a mix of housing with regard to site circumstances, the need to optimise output and in order to achieve mixed and balanced communities.

7.1.10 The overall mix of housing within the proposed development is as follows:

Unit Type	Units	%
1 bed flat	6	20.7
2 bed flat	9	31
3 bed flats / houses	4	13.8
4 bed flats / houses	10	34.5
TOTAL	29	100%

7.1.11 There is a large proportion of family housing units (14 units – 48.3% of the total) provided within the scheme. The surrounding character is one of family-sized housing and, also noting the relatively low access to public transport, the site is considered to be suitable for a development proposal consisting that includes a large proportion of family properties.

7.1.12 The Council's Housing team have stated that they are content with the development as proposed including the mix of units.

7.1.13 As such, it is considered that the proposed tenure and mix of housing provided within this development is acceptable.

7.1.14 Density

7.1.15 The supporting text of London Plan Policy 3.4 states that the London Plan Density Matrix should not be applied mechanistically. Its density ranges are intentionally 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 social infrastructure.

7.1.16 It is relevant to note that the draft London Plan proposes to remove the density matrix (draft Policy D6) and instead indicates that a design-led approach to finding a site's optimum density would be most appropriate. Nevertheless, an assessment of the applicant's density figures is provided below.

7.1.17 Policy DM11 of the Site Development Policies DPD states that the optimum housing potential of a site should be determined through a rigorous design-led approach.

7.1.18 The application site is within an „urban“ setting (terraced housing, mix of uses, within reach of a large district centre i.e. Wood Green) and has a maximum PTAL of 3. The Mayor's density matrix (Table 3.2 of the London Plan 2016) sets an indicative maximum threshold of 450 habitable rooms per hectare for residential developments in this type of location. The density calculation for this proposal is 446 hr/ha which is within the indicative thresholds.

7.1.19 Therefore, the density of the proposed development is acceptable.

7.2 Design and Appearance

7.2.1 The NPPF 2019 states that good design is a key aspect of sustainable development and that proposed developments should be visually attractive, be sympathetic to local character and history, and maintain a strong sense of place.

7.2.2 Policy DM1 of the DM DPD states that all new developments must achieve a high standard of design and contribute to the distinctive character of the local area.

7.2.3 The proposal would be formed of three main development blocks – Block A to the western end of the site, Block B to the northern side and a row of terraced houses.

7.2.4 Block A would be mainly three storeys in height with a stepped back fourth storey. Containing seven flats, it would be finished in yellow brick with grey metal balconies and window frames and timber-style cladding at ground floor. There would be residential entrances on both the north and west elevations fronting Crawley Road.

7.2.5 Block B would be three to four storeys in height with an elongated layout. Containing nineteen flats, it would be finished in yellow brick with grey horizontal banding, grey metal balconies and window frames and timber-style garage doors. The main residential entrance would be on the southern side of the building and surrounded by a communal amenity area.

7.2.6 The terraced houses would all be three storeys in height with dual-pitched roofs, finished in yellow brick, grey window frames with metal Juliet balconies, pressed metal roof copings and timber-frontage garage and entrance doors.

7.2.7 Between the northern (Block B) and southern (Block A and the houses) parts of the scheme would be a new publicly accessible connection from Crawley Road to Downhills Way. This new route would be designed for use by pedestrians and cycles and there would be no through-route for vehicles onto Downhills Way.

7.2.8 The proposed development would also incorporate a children’s play area and additional soft landscaping including new tree planting.

7.2.9 *Quality Review Panel (QRP)*

7.2.10 The proposal was twice presented to the QRP for review prior to this planning application being submitted. The most recent review took place on 30th January 2019 and the Panel’s summary comments are provided below:

7.2.11 *“The planning of the scheme seems very well ordered, and the nature and clarity of the central space is welcomed. Scope for improvement remains within the layout and configuration of the eastern section and „knuckle“ of Block B in order to improve the entrance, circulation arrangements and cycle storage for the flats, in addition to minimising the amount of blank frontage at ground floor. Exploring a different typology of units in this location may be helpful. The western end of Block A would also benefit from additional work to improve the generosity of the amenity space to the rear.”*

7.2.12 Below is a summary of key points from the most recent review, with officer comments following:

Panel Comments	Officer Response
Summary	
General support for the development, with scope for refinement to the eastern side and „knuckle“ of Block B (to improve functionality of entrance and circulation spaces, etc.) and to improve the amenity spaces of Block A.	Amongst other changes, the addition of balconies to the eastern end of Block B and reduction in garage space, and a more even amenity space split on the ground floor of Block A.
Place-making / Public Realm / Landscaping	
Central space is well-considered public realm. Provides a useful pedestrian connection to Downhills	Comments noted by case officer.

Way.	
Emerging hard and soft landscaping principles are supported. Creation of defensible spaces to houses is important.	Defensible spaces to the front of the proposed houses are created through the use of material differentiation and planting, which provides clear delineation between public and private realms.
Reducing the dimensions (width) of the mews space could help control fly-parking.	The pedestrian-cycle link is already fairly narrow, as is expected with a mews-style space, and cannot be reduced further without compromising other aspects of the development. Unauthorised parking can be controlled with physical landscaping features.
Careful consideration of the external space is required to minimise clutter within the mews. Street lighting can be included on buildings.	There is no street furniture aside from within the communal amenity area by the entrance to Block B i.e. away from the mews route. Lighting is now proposed to be installed on buildings should consent be granted.
The Panel acknowledges the difficulties encountered with the aspiration to open-up part of the Moselle Brook.	Comments noted by case officer. The Panel's comments have been reflected in the response from the Environment Agency, which acknowledges it cannot be de-culverted as part of this application.
The culverted stream must be considered strategically as part of a masterplan approach to the site, and in terms of how it interfaces with Block B.	Barriers to de-culverting the Moselle Brook within the remainder of the masterplan are likely to be the same as for this proposal. However, this matter will be re-considered as and when planning applications are submitted on adjacent sites within the site allocation area.
Layout / Architectural Expression	

<p>Overall layout and architectural expression are generally much improved since previous review.</p>	<p>Comments noted by case officer.</p>
<p>The scheme is more elegant and well-considered. The move from undercroft parking to garages is supported. Garages should be more generous in size. Layout of rear gardens to houses appears to have improved.</p>	<p>Noted by case officer. Following these comments, the sizes of garages to the houses has been increased.</p>
<p>The layout of Block B could improve, especially around the „knuckle“ to the east of the block. The ground floor of this block is visually sterile as it includes bin/cycle stores and garages.</p>	<p>Cycle and refuse stores need to be provided in easily accessible locations. The internal layout of Block B has improved since the Panel reviewed the scheme in terms of its efficiency and generosity; as has the main residential entrance is more clearly articulated to provide greater visual interest. Some garages have been replaced by habitable „studio“ areas and living rooms fronting public areas now have some defensible space.</p>
<p>The eastern section of Block B would benefit from a rethink of the layout to minimise blank walls fronting public areas and to create an attractive and generous entrance.</p>	<p>The eastern elevation of Block B now has balconies on all floors above ground level. To the east of this block is a play area to provide activity in this zone.</p>
<p>The Panel would encourage the provision of a „wet lobby“ entrance to Block B, including spaces for deliveries, letterboxes and direct access to the cycle store.</p>	<p>Amendments to the lobby area are difficult to provide due to the constrained nature of this part of the development.</p>
<p>Situating flats above garages within Block B leads to a visually bleak ground floor and long access corridors to the flats above.</p>	<p>Flats above garages have their own individual accesses from ground floor level, which brings more pedestrian activity onto the ground floor. The ground floor for Block B has now been enlivened through a more prominent communal entrance and installation of</p>

	defensible space for ground floor flats.
The Panel encourages the design team to locate townhouses to the eastern end of Block B to reduce corridor lengths and increase provision of dual-aspect flats.	Units to the eastern end of Block B are now duplex flats with dual-aspect and a townhouse-style layout.
The western end of Block A would benefit from increased amenity spaces. The Panel supports adjustments to the building line in this area, and unit layouts, to increase amenity space provision.	The building line for Block A has not changed as this would impact negatively on vehicle and pedestrian movements. The amenity space for Plot 2 (ground floor within Block A) has been increased slightly to make up for this.
The Panel welcomes the simplicity of the architecture, particularly the lighter tones of the brickwork, and the use of a single brick colour is supported. Further thought about the tones of brickwork could help strike a balance between simplicity/ coherence and variety to enliven the façade.	Comments noted by case officer. There is now more variation in the type and use of materials across the development given the different unit typologies proposed.
The Panel stresses that high quality brickwork and careful detailing are necessary to ensure a high-quality development.	Scheme detailing has been checked by officers and has significantly improved since pre-application discussions. High quality materials will be secured by condition should consent be granted.

7.2.13 As set out above, the applicant has actively 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.

7.2.14 Scale, Bulk and Massing

7.2.15 The proposed development is generally no more than three storeys in height, which reflects the maximum heights of dwellings in the surrounding area, which are predominantly two storeys plus a pitched roof. Block A has a fourth storey, although this upper floor is significantly set back from the western elevation, and

slightly set back from the northern elevation, so as to substantially reduce its apparent bulk as viewed from Crawley Road.

7.2.16 The western portion of Block B would also be four storeys in height. The additional height to Block B would form a focal point in public views from the western end of Crawley Road, signifying the entrance to the new route through to Downhills Way.

7.2.17 The tight-knit urbanised built form of the proposed blocks and rows of houses would reflect the townscape of the terraced rows in surrounding streets, whilst the „mews-style“ route between buildings would provide a visual break between blocks that follows the east-west route of Crawley Road. The link would contribute towards reducing the apparent massing of the development by providing a glimpse through to Downhills Way from Crawley Road, and vice versa.

7.2.18 The Council's Design Officer has commented on the height, bulk and massing of the scheme, and notes that the approach to to build up gently from the surrounding two storey terraced context to three and then 4, close to the centre of the site, where it is furthest from possible detrimental impact on neighbours, is reasonable.

7.2.19 The Design Officer considers the development an appropriate response to the context and the need for appropriate development, and to support a seamless, legible, and with a good sense of enclosure, extension to the network of public streets and spaces.

7.2.20 Street Scene Impact

7.2.21 This proposed development must respond to two residential streets – Downhills Way, running north-south to the east of the application site, which has a relatively verdant character due to the large soft landscaped zones between the existing houses and the adjacent road, and the more tight-knit built form of Crawley Road which runs east-west from the western end of the site.

7.2.22 In providing a new east-west route through the site the proposed development creates a new informal street, as an extension to Crawley Road. The more narrow and informal mews character of this new street helps to integrate the limited step-change in the appearance of the built form from the existing regular urban residential grain to a slightly denser mews-style character. This step in character is further reflected through the change in separation distances across the street which reduces from the 15-20 metre separation that exists on Crawley Road to a minimum separation distance of 8 metres towards the eastern end of the proposed development site.

7.2.23 The relatively open nature of the eastern end of the proposed development would reflect the character of the open yard area at the existing site, as well as reflecting the open and verdant appearance of the green buffer between Downhills Way and the existing taxi service centre.

7.2.24 The proposed mews-type street would be a welcome addition to the street layout in this area and, notwithstanding the substantial reduction in journey times necessary for residents on Crawley Road and the surrounding streets to reach the green fields of Lordship Recreation Ground, would also provide a high quality, landscaped and characterful increase in local street permeability.

7.2.25 The Council's Design Officer has commented on the streetscape character, and notes that: *"Establishing a street through the site establishes a clear streetscape character. The mews form is a widely accepted and often successful form, particularly as here when the street is intended to be a through route for pedestrians and cyclists only, not for vehicles, for whom access to residents only is provided."*

7.2.26 The Design Officer continues to state: *"All properties are entered off a front door off either the existing street network or this new street, with all the terraced houses and ground floor flats and maisonettes having a front door and garage door off the street, whilst the two communal front doors to the upper floor flats open off the wider area of amenity street or the side street beside the retained Barber Wilson building. This is considered to be an exemplary arrangement of streetscape and access, with a clear boundary between public realm and private, clear, visible front doors, minimal but sufficient thresholds and the potential for the street to be a welcoming and successful addition to the public realm"*.

7.2.27 *Materiality and Articulation*

7.2.28 The elevations of the proposed development would feature the consistent use of high-quality brick materials, an orderly integration of large window apertures interspersed with both recessed and projecting balconies, recessed brick panelling, and sufficient variation in detailing between different blocks and unit typologies to provide a uniqueness to each element of the scheme.

7.2.29 The proposed appearance of Block A would respect the appearance of the adjacent Barber, Wilsons & Co. building, through reflecting the rhythm of its horizontal fenestration as well as the integration of similar-sized window apertures.

7.2.30 The use of timber-style cladding accentuates entrance areas and adds to the landscaped character of the proposed development.

7.2.31 The proposed materials are expected to be durable and long-lasting consistent with those on the nearby houses, and this quality of materials can be secured by condition.

7.2.32 The Council's Design Officer states that: *"The proposed materiality, regular patterns of fenestration and proportions will create a calm, orderly, polite and attractive residential development, with elements of continuity and contrast within the development and reference, to surrounding buildings, especially to the neighbouring Barber Wilson Building, required to be retained in the site allocation, and in materials, to the surrounding residential terraces"*.

7.2.33 The Design Officer also comments on the proposed landscaping, stating that: *"The proposed landscaping uses a similar simple, robust palette, with block pavements throughout, slightly contrasting to distinguish trafficked from pedestrian only areas, interspersed with simple robust planting, street trees and benches"*.

7.2.34 Summary

7.2.35 The Council's Design Officer has summarised their assessment of the development as follows:

7.2.36 *"This is a high quality design, simple, straightforward and robust, that promises to provide a range of much needed, good quality residential accommodation. More importantly though, it proposes a vital new pedestrian and cycle link through the site, opening up greater permeability, better access for local residents to the facilities of Lordship Rec and increasing the attractiveness of active (pedestrian and cycle) travel options. With robust materials and details, this proposal should compliment this neighbourhood and increase accessibility for its residents."*

7.2.37 As such, it is considered that the proposed development would create a series of distinctive buildings of a high-quality design and finishing materials that would appropriately frame and articulate a new pedestrian-cycle connection from Crawley Road to Downhills Way. It would have a positive impact on the character and appearance of the surrounding area through replacing the existing low quality commercial buildings with a contemporary residential development of a modest uplift in scale in contrasting materials.

7.2.38 Therefore, the proposal is considered acceptable in design terms.

7.3 Residential Quality

7.3.1 The Mayor of London's Housing SPG sets out a range of detailed design requirements for new dwellings in London. Policy 3.6 of the London Plan states that development proposals should make provision for play and informal recreation. Policy 3.8 of the same document states that 90% of units should be

„accessible and adaptable“, with 10% „wheelchair user dwellings“ being provided according to Building Regulations Parts M4(2) and (3).

7.3.2 Policy DM1 of the DM DPD requires developments to provide a high standard of privacy and amenity for its occupiers.

7.3.3 *Residential Amenity and Play Space*

7.3.4 Standard 29 of the Housing SPG states that development should minimise the number of single aspect dwellings. It also states that single aspect dwellings that are north facing or of three or more bedrooms should be avoided.

7.3.5 Three of the 29 units (10%) would have only single aspect which is a relatively small proportion. None of these single aspect units would be north-facing. All family-sized units would be dual-aspect.

7.3.6 Standard 26 of the Housing SPG states that a minimum of 5sqm of private outdoor space should be provided for each dwelling, with larger spaces provided for units of three or more bedrooms. All units have direct access to at least one private amenity space of an appropriate size.

7.3.7 Standard 5 of the Housing SPG and Policy 3.6 of the London Plan state that development proposals with an estimated occupancy of ten children or more should provide play space on site in accordance with the Mayor’s Play and Informal Recreation (PIR) SPG. These policies are reflected in Policy S4 of the draft London Plan. The child population yield from this development requires approximately 180sqm of play space to be provided (based on the latest child playspace calculator).

7.3.8 The PIR SPG states that play space for under 5s should be provided within 100 metres of proposed residential units. 63sqm of secure gated play space would be provided to the north-eastern corner of the site, close to the access point from Downhills Way. This is within 100 metres of all residential units. Whilst this is estimated to be a slight under-provision against the child population yield target of approximately 80sqm, given that the proposed family-sized units all have their own private amenity spaces of much greater size than the prescribed minimum, the amount of under 5s play space provided for this proposal is considered to be acceptable in the circumstances.

7.3.9 There are large play areas for older children within Lordship Recreation Ground, including adjacent to Lordship Hub Co-op (approximately 400m from the furthest residential unit), with a skatepark and BMX track slightly further away (within 800m). These play areas are located within the distance requirements of the Mayor’s PIR SPG, given the respective ages of the children expected to use them.

7.3.10 In accordance with the Council's Planning Obligations SPD, as play space for older children is not provided on site, a financial contribution is required towards the upkeep of these existing play areas at a rate of £95 per square metre of off-site play space (117sqm), which is £11,115.00 in this case. This would be secured by legal agreement.

7.3.11 Outlook and Privacy

7.3.12 Most of the proposed flats have a minimum uninterrupted outlook from their main habitable room areas of between 14-17 metres. Some flats benefit from much greater levels of outlook. Flats within the narrowest part of the proposed development have an outlook of 8 metres (none of these windows are in the affordable units), and although this is a relatively low separation distance it is considered acceptable in the circumstances given the mews character of the development and given that flats with the lowest separation distance benefit from uninterrupted outlook in other directions.

7.3.13 The proposed houses have their private rear amenity areas to the southern side. Although one and two storey commercial buildings are located immediately to their rear of these properties, above this height the residential outlook would be substantial. All houses (aside from Plot 29) would benefit from a rear terrace at second floor level with uninterrupted outlook. Plot 29 would have a first floor terrace overlooking Downhills Way.

7.3.14 Where separation distances between the properties is less than 15 metres, overlooking between the upper floor living rooms in Block B and the proposed houses would be minimised through the integration of metal balustrades. 15 metres is otherwise considered to be an appropriate separation distance between upper floor main habitable rooms within a residential area.

7.3.15 Mutual overlooking between the bedrooms on the upper floors of both the proposed houses and Block A and their respective rear amenity areas would be reflective of overlooking that is fairly typical of traditional urban residential areas (i.e. terraced houses facing a terrace opposite) and thus is not considered to be materially harmful.

7.3.16 As such, it is considered that appropriate levels of outlook and privacy would be achieved for the proposed units.

7.3.17 Daylight and Sunlight

7.3.18 Daylighting to proposed units is typically assessed with average daylight factor (ADF). Building Research Establishment (BRE) thresholds are deemed as being met if an ADF factor of 2% for kitchens, 1.5% for living rooms and 1% for bedrooms are attained.

7.3.19 The applicant has submitted a *Daylight Assessment* (DA) with the application. The DA assesses four of the units which are anticipated to be the worst-case scenarios for daylighting within the development – Plots 2 and 3 in Block A, Plot 13 in Block B and the house named Plot 27. Of the units assessed all rooms meet the relevant ADF criteria and therefore pass the daylight assessment.

7.3.20 No formal assessment has been provided of access of the proposed units to sunlight. However, the development has a large proportion of south-facing façade, whilst most units are dual-aspect and are not north facing and therefore their habitable rooms are expected to be sunlit for at least part of the day. The units would clearly be well-lit and a formal assessment is not considered necessary.

7.3.21 As such, the sunlight provision to the proposed residential units is generally considered to be acceptable.

7.3.22 Other Amenity Considerations

7.3.23 The site is within a broadly residential area and therefore air quality is not anticipated to be particularly poor. Despite adjacent commercial businesses, the submitted *Noise Assessment* (NA) indicates that the dominant noise in the locality is from vehicles on Downhills Way. The relatively small-scale vehicle garages and other commercial activities that surround the site are anticipated to provide no more than intermittent and background noise, which would be reduced even further during evening periods and weekends when the houses are more likely to be occupied.

7.3.24 The Council's Noise Specialist has confirmed that internal noise levels within the proposed habitable rooms would meet acceptable standards.

7.3.25 Lighting throughout the site would be controlled by condition so it would not impact negatively on future occupiers.

7.3.26 Each block of flats has a communal waste store of an appropriate size at ground level, from which waste operatives can collect bins directly. Each house has an individual waste store. Bins are collected from the front of all properties on collection day, apart from for Plots 27 to 29. Their bins are instead required to be deposited in a designated location outside the communal waste store for Block B on collection day for waste operatives to collect. This arrangement has been ratified by the Council's Waste Management team. Further details of waste management can be secured by condition should consent be granted.

7.3.27 Accessibility

7.3.28 Three flats would be wheelchair accessible or adaptable in accordance with part M4(3) of the Building Regulations, which meets the 10% target required. These are Plots 3, 9 and 29.

7.3.29 *Security*

7.3.30 Pedestrian access through the site would be possible during all hours, as with a typical residential street. This increases the opportunity for passive surveillance and reduces opportunity for criminal activity. Doors, windows and access controls would be appropriately certified.

7.3.31 The Designing Out Crime Officer of the Metropolitan Police is satisfied that the development would be able to gain Secured by Design accreditation, and this requirement would be secured by condition.

7.3.32 As such, the residential quality of the proposed development is considered to be acceptable.

7.4 Impact on Neighbouring Amenity

7.4.1 London Plan Policy 7.6 states that development must not cause unacceptable harm to the amenity of surrounding land and buildings. DM Policy DM1 continues this approach and requires developments to ensure a high standard of privacy and amenity for its users and neighbours.

7.4.2 *Daylight Impact*

7.4.3 The applicant has submitted a *Daylight Assessment* (DA) with the application. This assessed daylight to windows at 21-29 (odds) and 30-38 (evens) Crawley Road, and to windows at 123-135 (odds) Downhills Way.

7.4.4 The DA shows that there would be minimal change to the vertical sky component (VSC) levels for existing properties as the result of the proposed development. Only two of the neighbouring windows analysed would fall marginally below the 27% VSC threshold, but this would not be a material loss of light. All other windows would be compliant. As such, neighbouring windows are considered to retain a good degree of daylight for an urban environment.

7.4.5 *Sunlight Impact*

7.4.6 The proposed development is sited to the south of properties on Downhills Way. A sunlight assessment within the DA shows that residential properties to the north would not be affected by the proposed buildings as their relatively insubstantial height would not lead to overshadowing of any windows, nor would any significant overshadowing of residential gardens occur.

7.4.7 Therefore, it is considered that there would be no significant impact on sunlight for neighbouring properties.

7.4.8 *Outlook and Privacy*

7.4.9 The proposed development would be oriented so as not to be close to the main habitable windows of nearby residential properties, including those on both Crawley Road and Downhills Way.

7.4.10 The proposed houses would be oriented with their rear elevations facing south which avoids their main habitable rooms facing directly towards those of neighbouring houses on Downhills Way. This is similarly the case for units within the proposed blocks of flats.

7.4.11 Although some overlooking of neighbouring residential gardens would be possible, mutual overlooking between individual houses and adjacent gardens cannot be avoided in an urban residential neighbourhood and would not be significantly increased by this proposal. In order to minimise overlooking towards gardens to the north, north-facing windows within Block B would be fitted with appropriately obscured glazing in accordance with a scheme to be secured by condition should consent be granted.

7.4.12 Therefore, it is considered that nearby residential properties would not be materially affected by the proposal in terms of loss of outlook or privacy.

7.4.13 *Other Amenity Considerations*

7.4.14 London Plan Policy 7.14 states that developments should address local problems of air quality. London Plan Policy 7.15 requires proposals to avoid significant adverse noise impacts. Policy DM23 states that developments should not have a detrimental impact on air quality, noise or light pollution.

7.4.15 The submitted *Air Quality Assessment (AQA)* states that both building and vehicle related emissions would be insignificant, subject to the provision of six electric vehicle charging points and provision of a residential travel plan to minimise car use which can be secured by condition. The Council's Pollution Officer concurs with this view.

7.4.16 The Council's Noise Specialist has stated that the increase in noise from the proposed residential properties would have a low impact on existing residents; officers consider this no worse than if the site returned to employment use.

7.4.17 Any disturbances that may arise from dust and noise relating to demolition and construction works would be temporary nuisances that are typically controlled by non-planning legislation. Nevertheless, the demolition and construction

methodology for the development would be controlled by the imposition of a condition on any grant of planning permission.

7.4.18 Therefore, it is considered that the proposed impact on neighbouring properties from noise, light and air pollution would be acceptable.

7.5 Parking and Highways

7.5.1 Local Plan Policy SP7 states that the Council aims to tackle climate change, improve local place shaping and public realm, and environmental and transport quality and safety by promoting public transport, walking and cycling. This approach is continued in DM Policies DM31 and DM32.

7.5.2 London Plan Policy 6.13 states that new development should demonstrate a balance between providing parking and preventing excessive amounts that would undermine cycling, walking and public transport use. It also states that electric vehicle charging points, disabled parking spaces, cycle parking should be provided at appropriate levels.

7.5.3 The site has a maximum public transport accessibility level (PTAL) of 3 (1 being poor and 6 being excellent). There are bus routes available to the north of the site and Turnpike Lane underground station is a reasonable walk to the south-west.

7.5.4 The site is located within the Belmont CPZ which restricts parking from Monday to Saturday, between 8am and 6.30pm.

7.5.5 The Council's Transportation team have considered the potential parking and public highway impact of this proposal and their comments are referenced in the assessment below.

7.5.6 Existing Site

7.5.7 The main formal access to the site is currently from Crawley Road via a secure gate. There is also a gated access available onto Downhills Way. However, in order to access the public highway on Downhills Way from the application site vehicles must cross over Council-owned land. Therefore, the applicant does not currently control this Downhills Way access.

7.5.8 15 parking spaces are available on site for the existing business operations, although it is noted these are provided on an ad hoc basis within the existing yard area and most of the spaces are usually taken up with taxis awaiting service or collection.

7.5.9 Trip Generation

7.5.10 The proposed development would include 16 parking spaces – 11 private garages and five located within the new shared surface area. The parking spaces would be accessed from Crawley Road. There is no vehicle access to the site proposed from Downhills Way as part of this development.

7.5.11 The Transportation Officer has assessed trip generation using available data from similar sites. Their comments are referenced below:

7.5.12 *“The forecasted trip generation of the development is 28 two-way person trips in the AM peak period and 21 two-way person trips on the PM peak period. The trip generation by mode is presented in the Table 5.2 of the TA [Transport Assessment]. The development is predicted to generate an approximate 4 two-way vehicle trips during the AM and 4 two-way vehicle trips during the PM peaks respectively. Rail/underground trips account for 15 two-way and 11 two-way trips during the AM and PM periods respectively. These additional trips will not create any material impacts on the public transport and highway networks.”*

7.5.13 As such, the trip generation impacts of the development proposal would be acceptable.

7.5.14 Access and Parking

7.5.15 The ratio of parking to residential units is 0.55. This is similar to the mean cars per household figure for the West Green Ward (0.54 as per 2011 Census data) and therefore the level of car parking proposed would match the expected parking demand.

7.5.16 Each family-sized property would have their own dedicated garage or adjoining parking space, apart from Plot 6 (Block A). One parking space within the shared surface area could be allocated to this unit, as that unit is more likely to have a car than smaller units. This can be secured as part of a condition for a car parking management plan.

7.5.17 The proposed level of parking provision is also supported by sustainable parking methodologies including the operation of a car club scheme, a travel plan and the provision of electric vehicle charging points.

7.5.18 Emerging Policy T6.1 Part G of the draft London Plan states that designated parking spaces for disabled persons must be identified for 3% of dwellings. For this development proposal that equates to one disabled parking space. There is an enlarged car parking space adjacent to the wheelchair-accessible house to the eastern end of the site (Plot 29).

7.5.19 As is also required by draft Policy T.61G, the applicant must demonstrate through a car parking management plan that a total of 10% designated disabled

parking can be provided in the future, if required. This can be secured by condition.

7.5.20 The parking spaces would be accessed from Crawley Road. There is no vehicle access available from Downhills Way, nor is there through access from Crawley Road to Downhills Way. The amount of vehicle movement along the shared surface path would therefore be very limited. A turning head has been provided by the eastern end of Block B and swept path diagrams adequately demonstrate that larger vehicles would be able to turn adequately within the site if required.

7.5.21 The Transportation Officer welcomes the integration of an east-west shared surface connection through the site, noting that it is a site allocation objective. The shared surface must be able to cater appropriately for blind and partially sighted people and this can be secured as part of an appropriate landscaping scheme for the shared areas of the proposed development.

7.5.22 Furthermore, in order to prevent fly-parking within this narrow area the conversion of residential garages would be restricted by condition. An appropriate management regime would also be employed, secured though a condition for a car parking management plan, to maintain the integrity of the pedestrian/cycle only route. Landscaping measures would also help to prevent fly-parking.

7.5.23 New Pedestrian-Cycle Route

7.5.24 The new east-west through route from Crawley Road to Downhills Way would connect the site and its environs to Lordship Recreation Ground via a new public pathway. This is proposed to run from the eastern end of the site to the existing pedestrian crossing to the north-east of the site. The provision of the link would also facilitate highway works to infill the existing vehicle access on Downhills Way with verdant planting. This is a key requirement of the Site Allocations SPD and will be a benefit to new and existing residents in the area.

7.5.25 The Transportation Officer agrees that utilising the existing crossing would be the most appropriate course of action as moving the crossing would not be viable due to potential conflict with existing trees and vehicle access points on Downhills Way.

7.5.26 This new route would need to be supported by a Road Safety Audit. The applicant has agreed to contribute £35,000 towards this new public route and its associated landscaping, which would be secured by legal agreement.

7.5.27 Cycle Parking

7.5.28 The London Plan 2016 requires one secure and sheltered cycle parking space per one-bedroom unit and two spaces per unit with two or more bedrooms. The

plans show a provision of 56 cycle parking spaces within the proposed houses or communal cycle stores. The requirement for this scheme is for 52 spaces, in accordance with London Plan policies. The Council's Transportation team has confirmed that this level of provision is in accordance with the London Plan.

7.5.29 The final details of the cycle parking layout shall be secured by condition in order to ensure that the final layout is appropriate and that the 2016 London Cycle Design Standard requirement for 5% of parking spaces to accommodate larger bicycles is met.

7.5.30 Deliveries and Servicing

7.5.31 The predicted delivery trip generation would be six vehicles per week. Two waste collections per week are also anticipated. These vehicle movements would not have a significant impact on the local highway network.

7.5.32 Waste trucks would be required to reverse into the site on collection days. Other very large vehicles would not be permitted to enter the site as safe turning would not be possible. The Transportation Officer has stated that waste vehicles could be differentiated from other large vehicles through the installation of retractable bollards on the western side of the link.

7.5.33 This bollard arrangement and details of their operation must be agreed at a later date. This can be secured by a condition for a delivery and servicing plan.

7.5.34 Construction Logistics and Management

7.5.35 No specific details of construction logistics and management have been submitted at application stage. However, this information is adequately able to be provided at a later stage, but prior to the commencement of works, and as such this matter can be secured by condition.

7.5.36 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.

7.6 Waterway Impact and Water Management

7.6.1 Policy 7.28 of the London Plan states that the Blue Ribbon Network should be restored and protected where possible.

7.6.2 Site Allocation SA60 states that the opportunity to de-culvert the Moselle should be considered. Policy SP5 of the Local Plan states that all development shall restore and enhance the Blue Ribbon Network, de-culverting wherever feasible, in order to improve water quality, waterway amenity and to help reduce flood risk.

7.6.3 Policy DM28 (Part A) of the DMDPD states that new development must be set back from an ordinary watercourse by 5 metres, or at an appropriate distance otherwise agreed with the Council and the Environment Agency.

7.6.4 Part C of the same policy requires development proposals to investigate de-culverting and environmental enhancements to watercourses, and to integrate these where possible. In accordance with Part E of that policy condition surveys for culverts to be retained must be provided that show that the culvert would function adequately during the lifetime of the development, with appropriate repairs made where necessary.

7.6.5 The supporting text to DM28 states that where the restoration of watercourses is not possible clear and robust justification shall be provided.

7.6.6 De-Culverting of the Moselle Brook

7.6.7 The applicant has submitted an *Options for De-Culverting* report with this application. The report states that to undertake even a relatively limited element of de-culverting, such as by removing the top of the culvert and strengthening the sides of the existing culvert structure, would not be feasible due to the requirement for permanent purchase of currently private land to undertake works (it would require land from a number of adjoining residential gardens on Downhills Way) and the complexity of undertaking construction works to a river within a built-up area.

7.6.8 The applicant has also presented legal advice which states that the land adjacent to the Moselle Brook is unregistered. Even if the landowner of the application site was considered a riparian landowner (i.e. a de factor owner of the adjacent river) they would only have rights over half the width of the river at any one point. Landowners on the other side of the river, the residential properties on Downhills Way, would thus have rights over the other half of the river and could veto any works (given that some would lose part of their rear gardens this is likely).

7.6.9 The Environment Agency has assessed the submitted documentation and considered the legal and land-take obstructions to de-culverting to be convincing. As such, it is considered that the de-culverting of the Moselle River adjacent to the application site would not be viable in this case.

7.6.10 Protection of the Culvert

7.6.11 The application site borders the Moselle Brook culvert to the north. This waterway has been located within a concrete culvert for over fifty years and is part of the Blue Ribbon Network. The minimum separation distance between the culvert and the proposed development is less than 1 metre.

7.6.12 To move Block B at least 5 metres away from the culvert would significantly reduce the development potential of the site, and could prejudice the potential for the development proposal to provide a comprehensive east-west connection which is a key requirement of site allocation SA60.

7.6.13 The Environment Agency has not objected to the siting of the proposed development in principle. However, they have raised some concerns in respect of the condition of the existing culvert and its potential ongoing structural sustainability during the lifetime of the development, which could be compromised during construction works.

7.6.14 Discussions between the applicant and the EA on this are ongoing and any resolution to grant will be subject to this matter being resolved.

7.6.15 An additional condition is also required in respect of the details of foundations of the proposed development. If approved, officers would liaise with the EA before discharging the condition.

7.6.16 As such, works to construct the development proposal within 5 metres of the culverted watercourse would be acceptable in this case, subject to conditions.

7.6.17 Flood Risk, Drainage Management and Groundwater Protection

7.6.18 London Plan Policies 5.12 and 5.13 require measures to reduce and manage flood risk. Local Plan Policy SP5, and Policies DM24 and DM25 of the DMDPD, state that development shall reduce forms of flooding and implement sustainable urban drainage systems (SUDS) where possible to improve water attenuation, quality and amenity.

7.6.19 The site is within Flood Zone 1 which equates to a low risk of flooding. Green roof areas on the development would provide some water retention. Surface water would be attenuated through the provision of porous paving throughout the site. The Council's SUDS Officer has stated that these methodologies provide an appropriate degree of surface water mitigation for the site.

7.6.20 Thames Water have also commented and raised no objection to the proposal, subject to conditions.

7.6.21 As such, it is considered that the proposal is acceptable in terms of its water management arrangements.

7.7 Sustainability and Biodiversity

7.7.1 Carbon Reduction

- 7.7.2 The NPPF, Policies 5.1-5.3 and 5.5-5.9 of the London Plan 2016, and Local Plan Policy SP4 set out the approach to climate change and require developments to meet the highest standards of sustainable design.
- 7.7.3 An *Energy Statement* and a *Sustainability Statement* have been submitted with the application. The applicant has demonstrated a 35.96% reduction in carbon dioxide emissions over that of the baseline of Part L of 2013 Building Regulations, as required. They have achieved this through design measures (including low energy light bulbs, building fabric efficiency, mechanical ventilation) and provision of photovoltaic panels at roof level.
- 7.7.4 The remaining carbon (30.23 tonnes per year) for this development must therefore be offset by way of a financial contribution at a rate of £1,800 per tonne. This figure of £54,410.40 would be secured by legal agreement should consent be granted.
- 7.7.5 *Overheating*
- 7.7.6 The applicant has submitted an *Overheating Assessment* with the application, which concluded that none of the assessed units shows a risk of overheating. The integration of individual heating systems, high efficiency glazing, appropriate unit stacking and a high proportion of dual-aspect units with openable windows all contribute to minimising overheating risk.
- 7.7.7 As such, the Council's Carbon Officer has confirmed that there is no risk of units overheating subject to the development being completed in accordance with the submitted overheating documentation, which can be secured by condition.
- 7.7.8 *Biodiversity*
- 7.7.9 Policies 5.3, 5.9 and 5.11 of the London Plan require developments to meet sustainable construction, passive cooling and green roof requirements. Local Plan Policy SP13 states that development shall contribute to providing ecological habitats including through providing green roofs plus other methodologies.
- 7.7.10 Green roof elements would be provided above Block B, and a simple but mixed range of tree and plant species would be provided throughout the application site and in public realm areas. Whilst these objectives are acceptable in principle, the proposals as presented lack detail. Therefore, further information is required in respect of the green roof, soft landscaping and biodiversity provision.
- 7.7.11 Additional information should be provided in respect of the proposed green roof area including details of access arrangements to this space, plant species, substrate depths and invertebrate habitat provision. A final detailed landscaping plan must be provided at a later date. The installation of bat and bird boxes must

also be considered and installed where appropriate. These matters can be adequately secured by condition should consent be granted.

7.7.12 As such, the application is acceptable in terms of its biodiversity impact.

7.8 Air Quality and Land Contamination

7.8.1 Air Quality

7.8.2 London Plan Policy 7.14 states that developments shall minimise increased exposure to existing poor air quality, make provision to address local problems of air quality and promote sustainable design and construction. The whole of the borough is an Air Quality Management Area.

7.8.3 An *Air Quality Assessment (AQA)* has been submitted with the application. The assessment states that, based on the anticipated energy usage of the proposed development building-related emissions would be air quality neutral.

7.8.4 The transport emissions, however, would not have a neutral impact. As such, mitigation measures are proposed in the form of the provision of at least six rapid-charge electric vehicle charging points (EVCPs) on site, with at least standard EVCPs being provided for each parking space, plus provision of a travel plan to encourage take up of sustainable transport methodologies. These can be secured by condition should consent be granted.

7.8.5 Should these mitigation measures be followed, the proposed development is anticipated to have an insignificant impact on nitrogen oxide and particulate matter concentrations within and surrounding the site.

7.8.6 In terms of the construction phase, the risk of dust soiling is noted by the AQA to be low to medium risk and that the human health impacts would be low risk. Construction phase activities would be carried out in accordance with the Mayor's Sustainable Design and Construction SPG.

7.8.7 As such, the Pollution Officer raises no objections to the proposal subject to the relevant conditions (or legal clauses as appropriate) being imposed in respect of electric vehicle parking, a travel plan, individual gas boilers, considerate contracting, dust management and works machinery.

7.8.8 Land Contamination

7.8.9 Policy DM23 requires development proposals on potentially contaminated land to follow a risk management based protocol to ensure contamination is properly addressed and to carry out investigations to remove or mitigate any risks to local receptors. London Plan Policy 5.21 supports the remediation of contaminated sites and to bringing contaminated land back into beneficial use.

- 7.8.10 The applicant has submitted a *Desk Study Report* with this application, which provides a review of information relating to geotechnical and geo- environmental factors affecting the site. The existing use is as a vehicle service business and surrounding business activities are of similarly potentially contaminating operations. There is also an electrical transformer located approximately 25 metres to the south-west of the site.
- 7.8.11 The report concludes that the overall risk of harm to end users for most of the site is low or very low. However, an intrusive investigation is recommended to identify the possible presence, nature and extent of any ground contamination and to assess risk to potential future residential occupiers. The Council's Pollution Officer agrees that further site investigation, sampling and analysis is required and has recommended appropriate conditions should consent be granted.
- 7.8.12 Therefore, the application is considered acceptable in terms of its impact on pollution and land contamination, subject to conditions should consent be granted.

6.11 Employment

- 6.11.1 Local Plan Policies SP8 and SP9 aim to support local employment, improve skills and training, and support access to jobs. The Council's Planning Obligations SPD requires all major developments to contribute towards local employment and training.
- 6.11.2 The existing taxi service centre is currently seeking to relocate, whilst the age, quality, layout and location of the existing buildings prevent their occupation by a wide range of potential businesses. The existing business does not currently employ large numbers of people.
- 6.11.3 It is relevant to note that the site has been identified for future residential use in the Council's Site Allocations DPD (SA60) and the site is not formally designated for long-term retention as an employment site in planning policy terms. As such, the Council's Economic Development team has not raised any objections to the loss of this employment site in the circumstances.
- 6.11.4 There would be opportunities for borough residents to be trained and employed as part of the development's construction process. The Council requires the developer (and its contractors and sub-contractors) to notify it of job vacancies, to employ a minimum of 20% of the on-site workforce from local residents (including trainees nominated by the Council). These requirements would be secured by legal agreement should consent be granted.
- 6.11.5 As such, the development is acceptable in terms of employment provision.

6.12 Fire Safety

6.12.1 Fire safety is not a planning matter and it is usually assessed at Building Regulations stage along with other technical building requirements relating to structure, ventilation and electrics, for example. However, upon consultation, the London Fire Brigade has confirmed that they are satisfied with the proposed development, which is expected to meet Building Regulations requirements.

6.12.2 As such, there are no objections to the application in respect of fire safety.

6.13 Section 106 Heads of Terms

6.13.1 Local Plan Policy SP17 and Policy DM48 of the DM DPD permit the Council to seek relevant financial and other contributions in the form of planning obligations to meet the infrastructure requirements of developments, where this is necessary to make the development acceptable in planning terms.

6.13.2 The Council's Planning Obligations SPD sets out the Council's approach, policies and procedures in respect of the use of planning obligations.

6.13.3 Planning obligations are to be secured from the development by way of a legal agreement, in the event that planning permission is granted, as described below:

9) Affordable Housing Provision

- 7 affordable housing units (19% by habitable room)
- 5 affordable rent units and 2 shared ownership units
- £230,000 financial contribution towards additional affordable housing

10) Play Space Contribution

- £11,115 towards the enhancement/upkeep of local play space

11) Sustainable Transport Initiatives

- Car Club Scheme
 - Two years free membership
 - £50 credit to every new resident (max. two per dwelling)
- Residential Travel Plan
 - Appointment of a travel plan co-ordinator for five years
 - Provision of welcome induction packs (containing public transport and cycling/walking information, including details of nearby bus/rail/tube services, map and timetables) to every new resident
 - Implementation of measures to use reasonable endeavours to achieve 8% cycle mode share by the 5th year

- Monitoring contribution (£3,000)

12) Section 278 Highways Agreement

- Includes, but is not limited to, the following:
 - Footway improvement works
 - Provision of access to the public highway
 - Street furniture relocation
 - Carriageway markings
 - Appropriate access and visibility safety provision

13) Carbon Mitigation

- Post-occupation Energy Statement review
- Contribution for carbon offsetting (£54,410.40), or more if required by Energy Statement review

14) Public Realm and Link to Lordship Recreation Ground

- To pay a Public Realm Contribution of £35,000 upon commencement of works on site to pay for the necessary public realm works for connecting the pedestrian/cycle route to the level crossing on Downhills Way.
- Works will include:
 - i. Pedestrian/cycle pathway infrastructure construction from east of site to Downhills Way crossing;
 - ii. Landscape verge improvements on land between the site and Downhills Way adjacent to new pedestrian/cycle route;
 - iii. Visibility safety requirements.
- A Road Safety Audit will be undertaken in support of the proposed connection

15) Employment Initiatives – Local Training and Employment Plan

- Provision of a named Employment Initiatives Co-Ordinator
- Notify the Council of any on-site vacancies
- 20% of the on-site workforce to be Haringey residents
- 5% of the on-site workforce to be Haringey resident trainees
- Provide apprenticeships at one per £3m development cost (max. 10% of total staff)
- Provide a support fee of £1,500 per apprenticeship towards recruitment costs

16) Monitoring Contribution

- 5% of total value of contributions (not including monitoring)
- £500 per non-financial contribution

- Total monitoring contribution to not exceed £50,000

6.14 Conclusion

- The application site forms part of a designated Site Allocation (SA60) in the Council's Site Allocation Development Planning Document (DPD) 2017. The part of the site allocation to which this proposal relates includes buildings that are in a poor condition. The surrounding area is predominantly residential in character.
- Demolition of the existing buildings and the construction of a wholly residential development is acceptable in principle (the site allocation does not require replacement employment space). The proposal would also provide a new east-west pedestrian and cycle connection across the site, which is also a requirement of the primary objectives of Site Allocation SA60.
- The development would provide 19% on-site affordable housing by habitable room in the form of 5 flats for affordable rent and 2 flats for shared ownership, which is an accepted tenure split, all within Block A. In addition it provides an off-site contribution of £230,000 which would assist the Council with its own affordable housing programme.
- The development would be of a high-quality contemporary design of an appropriate size and scale that would improve the visual quality of the local built environment.
- The development would provide high-quality living accommodation for residents, including an appropriate size and mix of units plus adequate private amenity space areas, whilst 10% of the flats would be adaptable for wheelchair users.
- The development would not have a material adverse impact on the amenity of adjoining occupiers in terms of a loss of sunlight and daylight, outlook, or privacy, nor in terms of excessive noise, light or air pollution.
- The Moselle Brook is just outside the application site. De-culverting has been considered but not to be achievable in this case, as supported by the Environment Agency; the applicant does not have control over it.
- The development would provide an appropriate quantity of car and cycle parking spaces for this location, and would be further supported by sustainable transport initiatives.
- The development would provide appropriate carbon reduction measures plus a carbon off-setting payment, as well as site drainage and biodiversity improvements.
- The application is considered acceptable for all other reasons as described above.

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

6.15 Community Infrastructure Levy

6.15.1 Based on the information submitted with the application, the Mayoral CIL charge would be £61,734.60 (1,028.91sqm x £60 x 1) and the Haringey CIL charge would be £19,168.59 (1,028.91sqm x £15 x 1.242).

6.15.2 This is based on the following figures derived from the submitted floor plans and the applicant's CIL form:

- Existing floor space demolished – 1,686.25sqm;
- New residential floor space – 2,715.16sqm;
- Affordable housing provision – 553.1sqm.

6.15.3 The provision of affordable housing may be exempt from Mayoral CIL liability. However, the applicant must apply for social housing relief before this element of the development can be deducted from the final CIL calculations.

6.15.4 CIL will be collected by Haringey after the scheme is implemented and could be subject to surcharges for failure to assume liability, or for failure to submit a commencement notice and/or for late payment, and will be subject to indexation in line with the construction costs index at the time.

6.15.5 An informative will be attached advising the applicant of this charge.

7 RECOMMENDATIONS

7.1.1 GRANT PERMISSION subject to conditions and subject to s.106 and s.278 Legal Agreements.

7.1.2 Applicant's drawing No.(s): WDG-519-A-ZZ-D-A-2001 Rev. P2, 2002 Rev. P2, 2102 Rev. P3; WDG-519-B-XX-D-A-2001 Rev. P6, 2101 Rev. P8; WDG-519-B-ZZ-D-A-2002 Rev. P6; WDG-519-S-00-D-A-9010 Rev. P8, 01-D-A-9011 Rev. P4, 02-D-A-9012 Rev. P4, 03-D-A-9013 Rev. P4; WDG-519-S-GF-D-A-7001 Rev. P3, GF-D-A-7002 Rev. P3, RF-D-A-9014 Rev. P4; WDG-519-S-XX-D-A-0101 Rev. P1, 0401 Rev. P1, 0402 Rev. P1, 0410 Rev. P1, 0411 Rev. P1, 2101 Rev. P3, 2111 Rev. P2; WDG-519-S-XX-DR-A-2110 Rev. P2; WDG-519-HT1-XX-D-A-2001 Rev. P5, 2101 Rev. P3, HT2-XX-D-A-2001 Rev. P2, 2101 Rev. P1; RFM-XX-00-DR-L-0001 Rev. PL02, 0004 Rev. PL02, 0007 Rev. PL02, 0009 Rev. PL02, 8001 Rev. PL01, 8002 Rev. PL01, 8003 Rev. PL01; RFM-XX-00-RP-L-0001 Rev. PL02; 3534-SK08 Rev. P1; SK09 Rev. P1; 18165-01-008; 3534-DS-101 Rev. P2, 102 Rev. P2; 180151-E-EX-01.

7.1.3 Design and Access Statement (Rev. P4), Schedule of Accommodation (Rev. E), Options for De-Culverting document (Rev. B, dated 16/5/2019), Transport Statement dated June 2019, Environmental Addendum dated June 2019, Affordable Housing & Viability Statement dated March 2019, Access

Arrangements note dated May 2019, Letter dated 2nd September 2019 from DOA Consulting Structural Engineers, Letter from Birketts LLP dated 1st March 2019, Planning Statement, Flood Risk Assessment and Sustainable Surface Water Strategy, Desk Study Report, External Lighting Report, Noise Assessment, Daylight Assessment, Overheating Assessment, Air Quality Assessment, Energy Statement, Sustainability Statement, Arboricultural Impact Assessment Survey & Report, Statement of Community Involvement, Daylight Sunlight Addendum.

Conditions:

- 1) The development hereby authorised must be begun not later than the expiration of two years from the date of this permission, failing which the permission shall be of no effect.

Reason: This condition is imposed by virtue of Section 91 of the Town and Country Planning Act 1990 and to prevent the accumulation of unimplemented planning permissions.

- 2) The development hereby permitted shall be carried out in material compliance with the following approved plans and specifications:

WDG-519-A-ZZ-D-A-2001 Rev. P2, 2002 Rev. P2, 2102 Rev. P3; WDG-519-B-XX-D-A-2001 Rev. P6, 2101 Rev. P8; WDG-519-B-ZZ-D-A-2002 Rev. P6; WDG-519-S-00-D-A-9010 Rev. P8, 01-D-A-9011 Rev. P4, 02-D-A-9012 Rev. P4, 03-D-A-9013 Rev. P4; WDG-519-S-GF-D-A-7001 Rev. P3, GF-D-A-7002 Rev. P3, RF-D-A-9014 Rev. P4; WDG-519-S-XX-D-A-0101 Rev. P1, 0401 Rev. P1, 0402 Rev. P1, 0410 Rev. P1, 0411 Rev. P1, 2101 Rev. P3, 2111 Rev. P2; WDG-519-S-XX-DR-A-2110 Rev. P2; WDG-519-HT1-XX-D-A-2001 Rev. P5, 2101 Rev. P3, HT2-XX-D-A-2001 Rev. P2, 2101 Rev. P1; RFM-XX-00-DR-L-0001 Rev. PL02, 0004 Rev. PL02, 0007 Rev. PL02, 0009 Rev. PL02, 8001 Rev. PL01, 8002 Rev. PL01, 8003 Rev. PL01; RFM-XX-00-RP-L-0001 Rev. PL02; 3534-SK08 Rev. P1; SK09 Rev. P1; 18165-01-008; 3534-DS-101 Rev. P2, 102 Rev. P2; 180151-E-EX-01.

Supporting documents also approved:

Design and Access Statement (Rev. P4), Schedule of Accommodation (Rev. E), Options for De-Culverting document (Rev. B, dated 16/5/2019), Transport Statement dated June 2019, Environmental Addendum dated June 2019, Affordable Housing & Viability Statement dated March 2019, Access Arrangements note dated May 2019, Letter dated 2nd September 2019 from DOA Consulting Structural Engineers, Letter from Birketts LLP dated 1st March 2019, Planning Statement, Flood Risk Assessment and Sustainable Surface Water Strategy, Desk Study Report, External Lighting Report, Noise Assessment, Daylight Assessment, Overheating Assessment, Air Quality Assessment, Energy Statement, Sustainability Statement, Arboricultural Impact Assessment Survey & Report, Statement of Community Involvement, Daylight Sunlight Addendum.

Reason: In order to avoid doubt and in the interests of good planning.

- 3) Prior to the commencement of works (other than investigative and demolition works) details of appropriately high-quality and durable finishing materials to be used for the external surfaces of the development shall be submitted to and approved in writing by the Local Planning Authority. Sample materials shall be provided for appropriately variegated bricks, timber-effect cladding and balcony finishes (including soffits) at a minimum shall be provided, combined with a schedule of the exact product references for other materials. The development shall thereafter be completed in accordance with the approved details.

Reason: In order to protect the character and appearance of the area and to protect the amenity of nearby residents in accordance with Policies DM1, DM8 and DM9 of the Development Management Development Plan Document 2017.

- 4) Notwithstanding the provisions of the Town & Country Planning General Permitted Development Order 2015 or any Order revoking or re-enacting that Order, no works shall be carried out within Class A-D of Part 1 of Schedule 2 of that Order without the grant of planning permission having first been obtained in advance from the Local Planning Authority.

Reason: To safeguard the visual amenities of the area and to prevent overdevelopment of the site and by controlling proposed extensions and alterations consistent with Policy 7.4 of the London Plan 2016 and Policy DM1 of The Development Management DPD 2017.

- 5) Details of exact finishing materials to the boundary treatments and site access controls shall be submitted to the Local Planning Authority for its written approval prior to the first occupation of the development hereby approved. Once approved the details shall be provided as agreed.

Reason: In order to provide a good quality local character, to protect residential amenity, and to promote secure and accessible environments in accordance with Policies DM1, DM2 and DM3 of the Development Management Development Plan Document 2017.

- 6) All the residential units will be built to Part M4(2) „accessible and adaptable dwellings“ of the Building Regulations 2010 (as amended) and at least 10% (9 units) shall be wheelchair accessible or easily adaptable for wheelchair use in accordance with Part M4(3) of the same Regulations, unless otherwise agreed in writing in advance with the Local Planning Authority.

Reason: To ensure that the proposed development meets the Council's Standards for the provision of wheelchair accessible dwellings in accordance with Local Plan 2017 Policy SP2 and London Plan 2016 Policy 3.8.

- 7) The placement of a satellite dish or television antenna on any external surface of the development is precluded, with the exception of a communal solution for the residential units details of which are to be submitted to the Local Planning Authority for its written approval prior to the first occupation of the development hereby approved. The provision shall be retained as installed thereafter.

Reason: To protect the visual amenity of the locality in accordance with Policy DM1 of the Development Management Development Plan Document 2017.

- 8) Prior to the commencement of works (other than investigative and demolition works) full details of both hard and soft landscape works for the private and public realm areas shall be submitted to and approved in writing by the Local Planning Authority, and these works shall thereafter be carried out as approved. These details shall include information regarding, as appropriate:

- a) Proposed finished levels or contours;
- b) Means of enclosure;
- c) Vehicle and cycle parking layouts;
- d) Vehicle and pedestrian access and circulation areas;
- e) Hard surfacing materials;
- f) Minor artefacts and structures (eg. Furniture, play equipment, refuse or other storage units, signs, lighting etc.); and
- g) Proposed and existing functional services above and below ground (eg. Drainage power, communications cables, pipelines etc. Indicating lines, manholes, supports etc.).

Soft landscape works shall include:

- h) Planting plans;
- i) Written specifications (including details of cultivation and other operations associated with plant and/or grass establishment);
- j) Schedules of plants, noting species, plant sizes and proposed numbers/densities where appropriate; and
- k) Implementation and management programmes.

The soft landscaping scheme shall include detailed drawings of:

- l) Existing trees to be retained;
- m) Existing trees which will require thinning, pruning, pollarding or lopping as a result of this consent; and
- n) Any new trees and shrubs to be planted together with a schedule of species.

The approved scheme of planting, seeding or turfing comprised in the approved details of landscaping shall be carried out and implemented in strict accordance with the approved details in the first planting and seeding season following the occupation of the building or the completion of development (whichever is sooner). Any trees or plants, either existing or proposed, which, within a period

of five years from the completion of the development die, are removed, become damaged or diseased shall be replaced in the next planting season with a similar size and species. The landscaping scheme, once implemented, is to be retained thereafter.

Reason: In order for the Local Planning Authority to assess the acceptability of any landscaping scheme in relation to the site itself, thereby ensuring a satisfactory setting for the proposed development in the interests of the visual amenity of the area consistent with Policy 7.21 of the London Plan 2016, Policy SP11 of the Local Plan 2017, and Policies DM1 and DM2 of the Development Management DPD 2017.

- 9) Prior to first occupation of the development hereby approved details of all external lighting to building facades, street furniture, communal and public realm areas shall be submitted to and approved in writing by the Local Planning Authority, in consultation with the Met Police. The agreed lighting scheme shall be installed as approved and retained as such thereafter.

Reason: To ensure the design quality of the development and also to safeguard residential amenity in accordance with Policy DM1 of the Development Management Development Plan Document 2017.

- 10) Prior to installation, details of the Ultra-Low NOx boilers for space heating and domestic hot water should be forwarded to the Local Planning Authority for its written approval. The boilers to be provided for space heating and domestic hot water shall have dry NOx emissions not exceeding 40 mg/kWh. Boilers shall be installed in accordance with the approved documentation.

Reason: To comply with Policy 7.14 of the London Plan 2016 and the Greater London Authority's Sustainable Design and Construction Supplementary Planning Guidance document.

- 11) All combination gas boilers that are to be installed throughout the development shall have a minimum SEDBUK rating of 91%. The applicant shall demonstrate compliance by supplying installation specification within three months post-completion of the development. Once installed these boilers shall be operated and maintained as such thereafter.

Reason: To comply with London Plan 2016 Policy 5.2 and Local Plan Policy SP4.

- 12) Prior to the commencement of any works a detailed Air Quality and Dust Management Plan (AQDMP), detailing the management of demolition and construction dust and including a Dust Risk Assessment, has been submitted and approved in writing by the Local Planning Authority. The plan shall be in accordance with the Greater London Authority's Dust and Emissions Control Supplementary Planning Guidance document (July 2014).

Reason: To comply with Policy 7.14 of the London Plan 2016.

- 13) Prior to the commencement of any works the site or Contractor Company is to register with the Considerate Constructors Scheme. Proof of registration must be sent to the Local Planning Authority.

Reason: To comply with Policy 7.14 of the London Plan 2016.

- 14) Prior to the commencement of any works on site, evidence of site registration at nrmm.london to allow continuing details of Non-Road Mobile Machinery (NRMM) and plant of net power between 37kW and 560 kW to be uploaded during the construction phase of the development shall be submitted to and approved by the Local Planning Authority in writing.

Reason: To protect local air quality.

- 15) All plant and machinery to be used during the demolition and construction phases of the development shall meet Stage IIIA of EU Directive 97/68/ EC for both NOx and PM emissions.

Reason: To protect local air quality.

- 16) An intrusive site investigation, sampling and analysis shall be undertaken using information obtained from 2019 Desk Study Report by Geo-Environmental Services Limited plus maps. The investigation must be comprehensive enough to enable: a risk assessment to be undertaken, refinement of the Conceptual Model, and the development of a Method Statement detailing the remediation requirements. (a) Prior to the commencement of the development hereby approved, other than for investigative work and demolition, the risk assessment and refined Conceptual Model shall be submitted, along with the site investigation report, to the Local Planning Authority, for its written approval. (b) If the approved risk assessment and approved refined Conceptual Model indicate any risk of harm, a Method Statement detailing the remediation requirements, using the information obtained from the site investigation, and also detailing any post-remedial monitoring shall be submitted to, and approved in writing by, the Local Planning Authority prior to that remediation being carried out on site.

Reason: To ensure the development can be implemented and occupied with adequate regard for environmental and public safety.

- 17) Where remediation of contamination on the site is required completion of the remediation detailed in the method statement shall be carried out and a report that provides verification that the required works have been carried out, shall be submitted to, and approved in writing by the Local Planning Authority before the development is occupied.

Reason: To ensure the development can be implemented and occupied with adequate regard for environmental and public safety.

- 18) At least eight weeks prior to the commencement of the development a Construction Management Plan (CMP) and Construction Logistics Plan (CLP) shall be submitted to Local Planning Authority for its written approval. The Plans should provide details on how construction work (inc. demolition) would be undertaken in a manner that disruption to traffic and pedestrians on Crawley Road, Downhills Way and the other roads surrounding the site is minimised. Construction vehicle movements should be carefully planned and coordinated to avoid the AM and PM peak periods. The plans must take into consideration other sites that are being developed locally and where possible co-ordinate movements to and implement also measures to safeguard and maintain the operation of the local highway network.

Reason: To ensure that the impacts of the development proposal on the local highways network are minimised during construction, and to coordinate construction activities in key regeneration areas which will have increased construction activities.

- 19) Prior to the first occupation of the development a Car Parking Management Plan (CPMP) shall be submitted to the Local Planning Authority for its written approval which shall include details of the allocation and management of the on-site car parking spaces, including the current and potential future provision of wheelchair-accessible parking spaces. Family-sized units shall be prioritised for allocated car parking spaces. The CPMP shall also describe an appropriate management regime for the shared surface area so that on-street parking (outside of designated parking bays) is minimised. The approved details shall thereafter be implemented as approved.

Reason: To ensure that the allocation of the off-street car parking spaces is in line with the Council's Development Management DPD Policy DM32, and Policy T6.1 of the draft London Plan.

- 20) Prior to first occupation of the development full details of the cycle parking arrangements (including the type and dimensions of the cycle parking equipment, the method of security and access, and the provision of 5% parking for larger cycles) shall be submitted in writing to and approved by the Local Planning Authority for its written approval. The cycle parking provision shall thereafter be provided in accordance with the approved details.

Reason: To promote sustainable transport, and in accordance with London Cycle Design Standards 2016.

21) All parking spaces shall be provided with electric vehicle charging points (EVCPs), with six parking spaces being provided with „rapid-charge“ electric vehicle charging equipment, as required by the Air Quality Assessment. Full specification details and the locations of the EVCPs shall be submitted to the Local Authority for its written approval three months prior to the commencement of works (other than investigative and demolition works). The EVCPs shall thereafter be installed in accordance with the approved plans and retained as such thereafter.

Reason: To reduce carbon emissions and improve air quality in line with the Local Plan Policy SP4.

22) Prior to the commencement of works (other than investigative and demolition works) a Delivery and Servicing Plan (DSP) shall be submitted to the Local Planning Authority for its written approval. The Delivery and Servicing Plan must include a Waste Management Strategy for the site, prepared in line with the Council's Waste Management service, setting out details of how refuse is to be collected from the site, details of how access controls (i.e. bollards) for waste tracks would operate, and ensuring that all bins are within 10 metres carrying distance of refuse collection vehicles on waste collection days. Once approved the requirements of the DSP shall be followed for the lifetime of the development.

Reason: To ensure that the development does not prejudice the free flow of traffic or public safety along the neighbouring highway.

23) Prior to the commencement of works (other than investigative and demolition works) on site details on the living roof shall be submitted to the Local Planning Authority for its written approval. This will include the following:

- a) A roof(s) plan identifying where the living roofs will be located;
- b) Confirmation that the substrates depth range between 120 and 150mm across all the roof(s);
- c) Details on the diversity of substrate depths across the roof to provide contours of substrate. This could include substrate mounds in areas with the greatest structural support to provide a variation in habitat;
- d) Details on the diversity of substrate types and sizes;
- e) Details on bare areas of substrate to allow for self-colonisation of local windblown seeds and invertebrates;
- f) Details on the range of native species of wildflowers and herbs planted to benefit native wildlife. The living roof(s) will not rely on one species of plant life such as Sedum (which are not native);
- g) Details of the location of log piles / flat stones for invertebrates; and,
- h) Details of the management plan (including access) to ensure that the Living Roof(s) sustains itself.

The living roof(s) will not be used for amenity or sitting out space of any kind. Access will only be permitted for maintenance, repair or escape in an emergency. The living roof(s) shall then be carried out strictly in accordance with the details approved by the Council. And shall be maintained as such thereafter. Reason: To ensure that the development provides the maximum provision towards the creation of habitats for biodiversity and supports the water retention on site during rainfall. In accordance with London Plan 2016 Policies 5.3, 5.9 and 5.11 and Local Plan Policies SP5 and SP13.

- 24) Within three months of completion of the structure of the development hereby approved, and prior to any part of the approved development being occupied (whichever comes first), an updated condition survey of the culvert, to identify any adverse impacts resulting from the construction works, shall be undertaken, submitted to, and approved in writing by the Local Planning Authority. Any damage that may have arisen during construction is to be remediated by the applicant within an agreed timeframe at no cost to the Environment Agency.

Reason: To ensure the structural integrity of the culvert is not compromised and to prevent flooding on site and elsewhere, in accordance with Paragraph 163 of the NPPF and Policy DM28 of the Development Management DPD.

- 25) No work on site shall take place until a detailed method and design for the piling works, or any other foundation designs within 8 metres of the Moselle Brook, has been submitted to, and approved in writing by, the Local Planning Authority (in consultation with Thames Water and the Environment Agency). Construction works shall thereafter be in accordance with the approved plans.

Reason: To ensure the structural integrity of the culvert is not compromised and to prevent flooding on site and elsewhere, in accordance with Paragraph 163 of the NPPF and Policy DM28 of the Development Management DPD. The proposed works would also be close to underground sewerage utility infrastructure.

- 26) Prior to the first occupation of each building or part of a building or use, a 'Secured by Design' accreditation shall be obtained for such building or part of such building or use and thereafter all features are to be permanently retained. The applicant shall seek the advice of the Metropolitan Police Service Designing Out Crime Officers (DOCOs) for each building or phase of the development and accreditation must be achieved according to current and relevant Secured by Design guidelines at the time of above grade works of each building or phase of said development. The development shall only be carried out in accordance with the approved details.

Reason: In accordance with the requirements of Policy DM2 of the Development Management Development Plan Document 2017.

27) Prior to the commencement of works (other than investigative and demolition works) the development hereby approved a scheme of window and obscure glazing design shall be submitted for the northern elevation of Block B for the written approval of the Local Planning Authority. Once approved, the agreed arrangement shall be retained as such in perpetuity.

Reason: To protect the amenity of adjoining residents in accordance with Policy DM1 of the Development Management DPD.

28) Prior to the commencement of works (other than investigative and demolition works) a management and maintenance plan for the proposed drainage system(s) (detailing future responsibilities for the lifetime of the development) and final detailed drawings of the proposed system(s), shall be submitted to the Local Planning Authority for its written approval. The system(s) shall be installed and managed as approved and retained as such thereafter.

Reason: To ensure adequate site drainage and minimise risk of flooding.

29) Prior to the commencement of works (other than investigative and demolition works) hereby approved details shall be submitted to the Local Planning Authority for its written approval demonstrating the provision of additional biodiversity features, which shall include: (a) invertebrate habitat provision, and; (b) provision of at least two bird boxes into the facade of the proposed development. The development shall be constructed in strict accordance with the approved details. Once installed these measures shall be maintained in perpetuity.

Reason: In accordance with Policy SP13 of the Local Plan 2017.

30) The energy efficiency standards as set out in the approved Energy Strategy (by NRG Consulting dated March 2019) which are as follows, shall be provided:

Building Element	Proposed Spec. (u-values)
External walls	0.18 (domestic))
Roof	0.13 (domestic)
Ground floor	0.13
Windows	1.4
Air tightness	5 m ³ /hr/m ² for domestic

The development shall be constructed and deliver the U-values set out in this document, in order to achieve the agreed carbon reduction level of 2.25% beyond 2013 Building Regulations. Confirmation that these energy efficiency standards and carbon reduction targets have been achieved must be submitted to the Local Planning Authority within six months of completion of the development for its written approval. This report will show emissions figures at design stage to demonstrate building regulations compliance, and then report

against the constructed building. The applicant must allow for site access if required to verify measures have been installed.

Reason: To comply with London Plan 2016 Policy 5.2 and Local Plan Policy SP4.

- 31) 108 no. PV solar panels, producing 37.26kWp output, shall be installed as set out in the approved Energy Strategy (by NRG Consulting dated March 2019). Confirmation of the siting and layout of the panels, and their kWp output must be submitted to the Local Planning Authority within six months of completion of the development for its written approval. Access to the site shall be permitted for the LPA to verify delivery, if required. The equipment shall be maintained as such thereafter.

Reason: To comply with London Plan 2016 Policy 5.7 and Local Plan Policy SP4.

- 32) The development shall be completed in accordance with the Overheating Assessment (by NRG Consulting dated March 2019). The development shall be maintained as such thereafter and no changes to the overheating strategy shall occur without the prior written consent of the Local Planning Authority.

Reason: To comply with London Plan 2016 Policy 5.9 and Local Plan Policy SP4.

- 33) The development shall be completed in accordance with the Noise Assessment (by NRG Consulting dated March 2019), which states that: (1) internal noise levels within habitable rooms will be designed in accordance with BS8233:2014, and; (2) both standard gas fired boilers and the mechanical extract/ventilation systems shall have a low noise impact on the nearest noise sensitive receptors. The development shall be maintained as such thereafter and no changes to the noise mitigation strategy shall occur without the prior written consent of the Local Planning Authority.

Reason: To comply with Policy DM1 of the Development Management DPD. 2017

INFORMATIVES

- 1) In dealing with this application the Council has implemented the requirement in the National Planning Policy Framework to work with the applicant in a positive and proactive way. The Council has made available detailed advice in the form of our development plan comprising the London Plan 2016 and the Haringey Local Plan 2017 along with relevant SPD/SPG documents, in order to ensure that the applicant has been given every opportunity to submit an application which is likely to be considered favourably. In addition, where appropriate, further guidance was offered to the applicant during the consideration of the application.

- 2) Based on the information submitted with the application, the Mayoral CIL charge would be £61,734.60 (1,028.91sqm x £60 x 1) and the Haringey CIL charge would be £19,168.59 (1,028.91sqm x £15 x 1.242).
- 3) The development hereby approved shall be completed in accordance with the associated Section 106 & Section 278 legal agreements.
- 4) The new development will require numbering. The applicant should contact Haringey Local Land Charges at least six weeks before the development is occupied (tel. 020 8489 5573) to arrange for the allocation of a suitable address.
- 5) Prior to demolition of existing buildings, an asbestos survey should be carried out to identify the location and type of asbestos containing materials. Any asbestos containing materials must be removed and disposed of in accordance with the correct procedure prior to any demolition or construction works carried out.
- 6) Contractors & developers undertaking significantly noise-creating construction works within the London Borough of Haringey are restricted to the following dates and times: Monday – Friday 08.00 – 18.00hrs; Saturday 08.00 - 13.00hrs; Sundays & Bank Holidays – no significantly noise-creating works permitted. Major developments are encouraged to apply for prior consent under Section 61 of the Control of Pollution Act 1974.
- 7) The Environmental Permitting (England and Wales) Regulations 2016 require a permit to be obtained for any activities which will take place:
 - on or within 8 metres of a main river (16 metres if tidal)
 - on or within 8 metres of a flood defence structure or culvert (16 metres if tidal)
 - on or within 16 metres of a sea defence
 - involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert
 - in a floodplain more than 8 metres from the river bank, culvert or flood defence structure (16 metres if it's a tidal main river) and you don't already have planning permission.

For further guidance please visit <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits> or contact our National Customer Contact Centre on 03702 422 549. The applicant should not assume that a permit will automatically be forthcoming once planning permission has been granted, and we advise them to consult with us at the earliest opportunity.

- 8) A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public

sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 020 3577 9483 or by emailing wwgriskmanagement@thameswater.co.uk. Application forms are online via www.thameswater.co.uk/wastewaterquality.


- 9) Thames Water will aim to provide customers with a minimum pressure of 10m head (approx. 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.

Appendix 1: Consultation Responses from Internal and External Agencies

Stakeholder	Comments	Response
INTERNAL		
Design Officer	<p>These proposals are for an industrial site that forms part of a site allocated in Haringey’s adopted Site Allocations DPD (adopted July 2017); SA60: Barber Wilson. The site allocation is for:</p> <p>Infill development of existing employment site to create improved green grid link between Wood Green and Tottenham through Lordship Recreation Ground and potential deculverting of the Moselle.</p> <p>Site Requirements and Development Guidelines include:</p> <ul style="list-style-type: none"> • Allocation site wide masterplan; • Retention of the existing Barber Wilson building (adjacent to, but not within this application site); • Establishing the link for pedestrians & cycles; • Investigating deculverting the Moselle (which runs in a capped culvert adjacent to but not through this application site); • No nett loss of employment floorspace (or s106 payment). <p>The principle of development including residential and workspace uses across the wider allocation site is therefore established, but provided the public good of the link and the employment floorspace is met.</p> <p>The application site is only part of the allocation site; approximately one quarter, and there are three other major land owners. The applicant has undertaken to provide the pedestrian and cycle link through their part of the site, with the development being otherwise 100% residential, and the required employment space being provided on the remainder of the allocation sites. Subject to legal agreement the principle of development in accordance with this application is therefore established as being in accordance with the adopted Site Allocation.</p>	<p>Comments noted. Materials to be controlled by condition.</p>

Stakeholder	Comments	Response
	<p data-bbox="443 233 894 264">Form & Pattern of Development</p> <p data-bbox="443 306 1812 594">Broadly, the proposals continue the line of Crawley Road in a straight line through the site, and line either side with street facing, terraced properties facing this extended street. However, the form of this street is tightened from the surrounding existing streets into one more of the character of a mews. The built form lining this street on the north side is of a block that inflects from the existing building line to Crawley Road, whilst the built form on the south side steps out to the pavement edge at the corner of the site and maintains that straight alignment. In both cases an access road to the existing industrial units to the northern and southern side of the allocation site separate these from the existing houses to the west.</p> <p data-bbox="443 636 1806 992">The type of mews proposed here is different to the more private, gated mews developments often seen in close proximities to town centres, such as Silver Court, Frederick Mews and the current Crescent Mews application (HGY/2019/1183), exemplary though those are (or potentially could be). This is more like the sort of mews developed in a more “residential hinterland” area, away from town centres, where a development site has the potential to connect fragmented residential areas, without exacerbating vehicular traffic problems. Good examples elsewhere in the borough include the award winning Woodside Square development in Muswell Hill, where three and four storey townhouses and flatted blocks face each other across intimate mews type streets that both provide access and a popular public route between existing residential Grand Avenue to the north and the school (St James Primary) and Highgate Wood to the south:</p>	

Stakeholder	Comments	Response
	 A photograph showing a perspective view of a modern, multi-story brick residential building. The building features large windows, some with dark frames, and a mix of brick and wood paneling. A paved walkway runs alongside the building, with several people walking in the distance. The sky is clear and blue.	

Stakeholder	Comments	Response
	 <p data-bbox="443 906 1808 1159">In this respect the built form reflects elements of both the existing industrial buildings on the site, with their long straight forms and narrower gaps between them, with the shorter, more set-back terraced residential properties surrounding the site. It builds up to its highest and most prominent at the two corners to the short streets leading off north and south, to the neighbouring industrial sites (and future developments), with built form that potentially marks those corners, and then gently steps down, becoming more intimate and closely spaced as its height reduces towards the eastern end of the site. It therefore represents a legible and rational response to the site.</p> <p data-bbox="443 1198 936 1230">Streetscape Character & Approach</p> <p data-bbox="443 1269 1808 1409">Establishing a street through the site establishes a clear streetscape character. The mews form is a widely accepted and often successful form, particularly as here when the street is intended to be a through route for pedestrians and cyclists only, not for vehicles, for whom access to residents only is provided. It is important that it be a clear and legible route, as it is here, to</p>	

Stakeholder	Comments	Response
	<p>encourage use and give confidence to pedestrians and cyclists. The mews form of street is not typical of the surrounding area, but it can be characterised as being the nature of the streets within this immediate site, providing access to the industrial units to the north and south and the spaces within the site. It is also used successfully in many places elsewhere, especially where pedestrians and cycles are prioritised over vehicles, such as Woodside Square mentioned above, and notable developments in Cambridge such as Acordia and Eddington.</p> <p>The character of a street is defined by its enclosing buildings and its landscaping. The new mews street (or extended Crawley Road), would form a gentle transition, with its western end, where the street width between buildings is wider, containing landscaping street trees, informal seating and three parking spaces. The remainder would be a shared surface continuing the pavement line of the south side, but wide enough for residents cars, pedestrians and cycles to share the space, separated from the housing on both sides by a buffer of planting. At the eastern end, the block to the north side steps back from the Downhills Way frontage where the culverted Moselle (outside this applicants' ownership) "squeezes" the space available, and a small green landscaped triangle contains enough space for a turning circle (leaving potential for its future deculverting), whilst on the south side, the end terraced house has a design to turn the corner and match the building line of the neighbouring existing houses.</p> <p>All properties are entered off a front door off either the existing street network or this new street, with all the terraced houses and ground floor flats and maisonettes having a front door and garage door off the street, whilst the two communal front doors to the upper floor flats open off the wider area of amenity street or the side street beside the retained Barber Wilson building. This is considered to be an exemplary arrangement of streetscape and access, with a clear boundary between public realm and private, clear, visible front doors, minimal but sufficient thresholds and the potential for the street to be a welcoming and successful addition to the public realm.</p> <p>Bulk & Massing</p> <p>The approach to bulk and massing in this proposal is to build up gently from the surrounding two storey terraced context to three and, close to the centre of the site, where it is furthest from</p>	

Stakeholder	Comments	Response
	<p>possible detrimental impact on neighbours, where it is widest across the new (extended) street and where it contributes to the legibility of the urban form, marking those street corners. It is reasonable to expect a modest step up in height when significant new development is built in an area originally developed up to 100 years ago as two storey terraced housing in large gardens, and other neighbouring developments, such as Penistone Close not far to the north (now 20+ years old itself) and the Downhills Park development (former Keston Centre) to the south east of the site, have stepped up with one or two additional floor, despite also being in the “hinterland” of residential terraced housing.</p> <p>In detail the bulk and massing takes the form of a single block on the north side of the extended street, of three storeys at its eastern end, where it is set back from the corner with neighbouring two storey existing terraced housing facing Downhills Way, rising to four storeys mid way along and continuing to its western end, marking the corner of the street to the north and enclosing the north-east side of the amenity space. On the south side the form is more varied, with a two and three storey corner-special house at the eastern end turning the corner from the Downhills Way houses to the south, continuing through the site as a terrace of three storey townhouses, of a repeated pitched roofed form, the gables facing the street giving identity to each house, before stepping up to a three storey, with set back fourth floor flatted block forming the corner to the street at the western end of the site.</p> <p>This proposed bulk and massing, with careful consideration of how it will impact on neighbours and produce attractive public realm and good quality accommodation, is considered an appropriate response to the context and the need for appropriate development, and to support a seamless, legible, and with a good sense of enclosure, extension to the network of public streets and spaces.</p> <p>Elevational Treatment, Fenestration, including Balconies and Materials</p> <p>The proposed materials palette for the buildings is simple and robust. The primary building material throughout is a buff brick to match the existing context. This is treated differently on the three contrasting block forms; Block A, the flatted block on the southern side of the news street, is proposed to have a gridded pattern of regular window or recessed balcony openings, with the</p>	

Stakeholder	Comments	Response
	<p>“holes” in the grid where there is only intended to be a smaller window made up with recessed panels of textured courses of the same brick. Balconies will be partially recessed, partially projecting, with metal balustrade and fascia, privacy and hiding of clutter being achieved by them having deep recesses.</p> <p>Block B, the larger flatted block along the north side of the street, is proposed to have the same brick and partially recessed, partially projecting balconies, but detailed with horizontal bands of concrete or reconstituted stone, to emphasise the horizontality and dynamic “z” form of the block. In contrast, the terrace of townhouses, which continues the line of Block A but is opposite to where Block B gets closer, has a vertical emphasis and fenestration that emphasises the unity of each house unit, with their pitched gables, recess (containing rainwater downpipe) between each house, and recessed brick panels beside narrow vertically proportioned windows.</p> <p>The proposed landscaping uses a similar simple, robust palette, with block pavements throughout, slightly contrasting to distinguish trafficked from pedestrian only areas, interspersed with simple robust planting, street trees and benches.</p> <p>The proposed materiality, regular patterns of fenestration and proportions will create a calm, orderly, polite and attractive residential development, with elements of continuity and contrast within the development and reference, to surrounding buildings, especially to the neighbouring Barber Wilson Building, required to be retained in the site allocation, and in materials, to the surrounding residential terraces. There is strong evidence that provided chosen materials are of good quality, which will have to be secured by condition, this development would be robust, durable and attractive for years to come.</p> <p>Residential Quality (flat, room & private amenity space shape, size, quality and aspect)</p> <p>All maisonette, flat and room sizes comply with or exceed minima defined in the Nationally Described Space Standards, as is to be routinely expected. There are only three single aspect flats within the proposed development; these are all south-west facing, onto the mews street where the public amenity space and trees will be located, and open onto a corridor with obscured glazing onto the gardens of houses to the north. Other flats are located on corners or are</p>	

Stakeholder	Comments	Response
	<p>through flats, with the two maisonettes at the eastern end of Block B being particularly innovative, with their first and second floors “swapping over” so that both have living rooms and private balconies looking east down the mews and onto Downhills Way and Lordship Rec beyond, with only bedrooms facing onto the mews street.</p> <p>All dwellings meet or exceed the private external amenity space in the London Plan, with private gardens, balconies or roof terraces. Privacy of amenity space is achieved by all balconies being partially recessed. All the townhouses have south facing private gardens, and several flats have benefit of generous roof terraces, positioned and designed to avoid overlooking of neighbours. The development would also benefit from pocket park doorstep amenity and playspace at either end of the site within the mews street, as well as the large public park of Lordship Rec just across Downhills Way from the site.</p> <p>Cycle parking and refuse storage is organised in distributed locations close to residential or communal front doors with ready access to the street, to meet the councils collection standards and London Plan cycle parking requirements. Over concentration of blank frontage from service doors, to refuse, cycles or plant, is avoided.</p> <p>Privacy / Overlooking of Proposed Residents and Existing Neighbours</p> <p>Despite being surrounded by existing housing, the proposed development is never in close proximity to existing neighbouring dwellings, except at the corners of the proposed street to Downhills Way, where blank, unfenestrated rear facades to corner flats and the corner-special townhouse avoid overlooking the nearest existing houses. The culverted Moselle also forms a landscaped buffer strip between Block B in the proposal and the neighbouring houses to the north, with that block generally only having bathroom and corridor windows (generally obscured) anyway facing north.</p> <p>The width of the proposed mews means that some proposed residential windows within the development will look across the street to other windows within the development at quite close quarters. However, due to the development layout, these are all bedroom windows; the houses to the south of the street having living rooms on the ground floor facing their private gardens, and</p>	

Stakeholder	Comments	Response
	<p>the closest flats in Block B being the “scissor flats” with their living rooms on the corner, primarily facing east.</p> <p>Daylight and Sunlight</p> <p>Of relevance to this section, Haringey policy in the DM DPD DM1 requires that: “...D Development proposals must ensure a high standard of privacy and amenity for the development’s users and neighbours. The council will support proposals that:</p> <ol style="list-style-type: none"> a. Provide appropriate sunlight, daylight and open aspects (including private amenity spaces where required) to all parts of the development and adjacent buildings and land; b. Provide an appropriate amount of privacy to their residents and neighbouring properties to avoid overlooking and loss of privacy detrimental to the amenity of neighbouring residents and residents of the development...” <p>The applicants provided Daylight and Sunlight Report on their proposals and of the effect of their proposals on neighbouring dwellings. These have been prepared broadly in accordance with council policy following the methods explained in the Building Research Establishment’s publication “Site Layout Planning for Daylight and Sunlight – A Guide to Good Practice” (2nd Edition, Littlefair, 2011) , known as “The BRE Guide”.</p> <p>The assessment finds that the impact of the development on existing neighbouring residential properties is overwhelmingly favourable for both daylight and sunlight, with only two neighbouring existing windows losing a noticeable amount of daylight, no neighbouring windows or outdoor amenity spaces losing a noticeable amount of sunlight and all the accommodation within the proposed development receiving more than a sufficient amount of daylight, as defined by the BRE Guide.</p> <p>The to affected windows are on the ground floor side of no. 38 Crawley Road, the residential property immediately to the west of the application site. This end of terrace property is on the north side of Crawley Road, with its front looking onto the street, and with north facing rear windows looking onto a private back garden. Unlike most terraced properties it also has a side</p>	

Stakeholder	Comments	Response
	<p>flank elevation containing windows, looking onto and right on the pavement edge of what is currently the access road to this and neighbouring industrial properties. The two windows affected are on the ground floor of this side elevation; it is not known whether these are habitable rooms, but if they are, whilst they may receive adequate daylight, they currently have a poor outlook. The amount of daylight they are predicted to lose, 23% and 29% of their current levels, is only a small amount over the minimum threshold which the BRE Guide finds is noticeable (losses of 20% or less are found to not be noticed), and they would retain relatively good daylight levels of 23.63% and 26.93% Vertical Sky Component (a 27% VSC is considered in the BRE Guide a Good level of daylight).</p> <p>it should be noted that the BRE Guide itself states that it is written with low density, suburban patterns of development in mind and should not be slavishly applied to more urban locations; as in London, the Mayor of London's Housing SPG acknowledges. In particular, the 27% VSC recommended guideline is based on a low density suburban housing model and in an urban environment it is recognised that VSC values in excess of 20% are considered as reasonably good, and that VSC values in the mid-teens are deemed acceptable. Paragraph 2.3.29 of the GLA Housing SPD supports this view as it acknowledges that natural light can be restricted in densely developed parts of the city. Therefore, full or near full compliance with the BRE Guide, as achieved in this proposal, is not usually to be expected and is considered an exceptionally good result.</p> <p>Masterplan</p> <p>To show that development of this site in this form would not harm either existing neighbours or the potential to develop the other parts of this wider allocation site, and to meet the specific site requirement, the applicants produced a series of masterplan permutations for the whole allocation site. These show their site in their proposed form with development on the rest of the allocation, with employment space split between the northern and southern halves, or concentrated in one or the other half.</p> <p>Conclusions</p>	

Stakeholder	Comments	Response
	<p>This is a high quality design, simple, straightforward and robust, that promises to provide a range of much needed, good quality residential accommodation. More importantly though, it proposes a vital new pedestrian and cycle link through the site, opening up greater permeability, better access for local residents to the facilities of Lordship Rec and increasing the attractiveness of active (pedestrian and cycle) travel options. With robust materials and details, this proposal should compliment this neighbourhood and increase accessibility for its residents.</p>	
<p>Transportation</p>	<p>Proposal</p> <p>The proposal entails the demolition of existing buildings and erection of two part-three and part-four storey residential blocks and a row of three-storey terraced houses (totalling 29 units) and provision of a pedestrian/cycle link through the development, connecting Crawley Road to Downhills Way, plus landscaping, cycle and car parking, and other associated works.</p> <p>Site Location and Context</p> <p>The development site is in Crawley Road and is bounded by Downhills Way to its east. These roads are part of the Haringey Local Road Network. Crawley Road is an unclassified road, whilst Downhills Way is a classified road (B155). Crawley Road, Downhills Way and other streets in the immediate vicinity of the site are included in a controlled parking zone (Belmont (B) CPZ), which operates Monday to Friday 8AM to 6:30PM. The wider area is comprehensively cover by CPZs and as such, unrestricted parking in the area is strictly limited. It is noted that there are formal parking bays along the site frontage in Crawley Road.</p> <p>In terms of the public transport options in the area, there are seven (7) bus routes serving the site (444, 231, 243, 144, 123, 217 and W4). These seven (7) bus routes have a combined frequency of 44.5 buses per hour during the AM and PM peak periods. The site is remote from rail or underground services, but it is noted that the bus routes operating in the vicinity provides a direct link to the nearest rail/underground stations such as Turnpike Lane, which offers London Underground Piccadilly Line services via Central London. Most of the site achieves a public transport accessibility level (PTAL) of 2 (with 0 being the worst and 6b being the best).</p>	<p>Observations have been taken into account. The recommended legal agreement clauses, conditions and informatives will be included with any grant of planning permission as appropriate.</p>

Stakeholder	Comments	Response
	<p data-bbox="443 269 653 302">Cycle Network</p> <p data-bbox="443 342 1814 521">The cycle network in the vicinity of the site consists of a mixture of on and off-road cycle routes. There is an off-road cycle route running north-south through Lordship Recreation Ground to the east of the site. Additionally, there is an east-west cycle link through Lordship Recreation Ground that provides a connection, via Freedom Road and Adams Road, to Cycle Superhighway 1 (CS1) running north-south on along the A10 (High Road).</p> <p data-bbox="443 561 653 594">Policy Context</p> <p data-bbox="443 634 737 667">Site Allocations DPD</p> <p data-bbox="443 708 1814 959">This site is part of a site allocation for a wider site that is designated as SA60 in the Haringey Site Allocations DPD (2017). The requirements as stipulated in this document is that development proposals within this site will need to take a masterplan approach. The policy writes “development must be accompanied by a site wide masterplan showing how the land included meets the policy and does not compromise coordinated development on land parcels within the allocation in line with Policy DM55”. Additionally, the Site Allocations DPD requires the creation a clear link between Crawley Road through to Lordship Recreation Ground.</p> <p data-bbox="443 1000 737 1032">London Plan Policies</p> <p data-bbox="443 1073 764 1105">Policy 6.1 & 6.2 – 6.14</p> <p data-bbox="443 1146 1751 1398">The policies sets out the strategic approach to transport and encourages patterns of developments that reduce the need to travel, especially by private car; promotes improved capacity and accessibility of public transport, walking and cycling; promotes improvements to interchanges between different forms of transport, especially around rail and underground stations; supports measures that encourage a shift to sustainable modes and appropriate demand management; promotes greater use of low carbon technologies aimed at reducing carbon emissions from transport; and seek to promote walking through improving the public</p>	

Stakeholder	Comments	Response
	<p>realm. Policies 6.2 to 6.14 sets out the Mayor’s specific requirements for all modes and the approach that Local Authorities in London should take in assessing major development proposals.</p> <p>Policy 6.13, of the London Plan sets out car parking standards, and strategic direction to facilitate new developments with appropriate levels of parking. It indicates that, maximum car parking standards for residential developments in the outer London with a high PTAL is up to 1 space per unit. LBH is identified on the map 2.2, as part of the outer London.</p> <p>Parking addendum to Chapter 6 has recommendations for blue badge holders indicating that: for residential developments, requirement is a provision for at least one accessible on or off-street parking space. It is also stated that when off-street parking is provided then at least two parking spaces should be for blue badge holders.</p> <p>Draft London Plan</p> <p>Policy T6 Car parking of the emerging draft London Plan indicates that car-free is the starting point for all developments, which are, or planned to be, well connected. Table 10.3 has the maximum parking standards based on location and PTAL score. The recommended maxima for development site in locations of PTAL 2 is up to 1 space per unit.</p> <p>Policy DM31 and DM31</p> <p>Policy DM31 promote high-trip generating developments in areas of high public transport accessibility, where the generated car travel can be minimised. The policy encourages walking and cycling and promotes improved pedestrian and cycle routes and links with public transport facilities. Policy DM32 supports limited or no on-site car parking in areas of PTAL 4 and above, where a controlled parking zone (CPZ) exists or will be introduced prior to the occupation of the development.</p> <p>Trip Generation and Impacts</p>	

Stakeholder	Comments	Response																																																																																																																																		
	<p>The principles and methodologies for assessment of the residual highway and transportation impacts of the development were discussed at the pre-application state and are acceptable. The TRICS sites used to derive the trips rates for calculating the trip generation of the proposed development were approved by the Council as part of the Transport Assessment Scoping Report.</p> <table border="1" data-bbox="716 456 1535 899"> <thead> <tr> <th rowspan="2">Mode</th> <th rowspan="2">% Mode Share</th> <th colspan="3">AM Peak</th> <th colspan="3">PM Peak</th> <th colspan="3">Daily Flows</th> </tr> <tr> <th>In</th> <th>Out</th> <th>Total</th> <th>In</th> <th>Out</th> <th>Total</th> <th>In</th> <th>Out</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>Rail</td> <td>48%</td> <td>3</td> <td>11</td> <td>14</td> <td>7</td> <td>4</td> <td>10</td> <td>59</td> <td>58</td> <td>117</td> </tr> <tr> <td>Train</td> <td>4%</td> <td>0</td> <td>1</td> <td>1</td> <td>1</td> <td>0</td> <td>1</td> <td>5</td> <td>5</td> <td>10</td> </tr> <tr> <td>Bus</td> <td>18%</td> <td>1</td> <td>4</td> <td>5</td> <td>3</td> <td>1</td> <td>4</td> <td>22</td> <td>22</td> <td>44</td> </tr> <tr> <td>Motorcycle</td> <td>1%</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> <td>1</td> <td>1</td> <td>2</td> </tr> <tr> <td>Car</td> <td>17%</td> <td>1</td> <td>4</td> <td>5</td> <td>2</td> <td>1</td> <td>4</td> <td>21</td> <td>20</td> <td>41</td> </tr> <tr> <td>Car share</td> <td>1%</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> <td>1</td> <td>1</td> <td>2</td> </tr> <tr> <td>Bicycle</td> <td>5%</td> <td>0</td> <td>1</td> <td>1</td> <td>1</td> <td>0</td> <td>1</td> <td>6</td> <td>6</td> <td>12</td> </tr> <tr> <td>On foot</td> <td>5%</td> <td>0</td> <td>1</td> <td>1</td> <td>1</td> <td>0</td> <td>1</td> <td>6</td> <td>6</td> <td>12</td> </tr> <tr> <td>Other</td> <td>1%</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> <td>1</td> <td>1</td> <td>2</td> </tr> <tr> <td>Total People</td> <td>100%</td> <td>6</td> <td>22</td> <td>28</td> <td>14</td> <td>7</td> <td>21</td> <td>124</td> <td>121</td> <td>244</td> </tr> </tbody> </table> <p>The forecasted trip generation of the development is 28 two-way person trips in the AM peak period and 21 two-way person trips on the PM peak period. The trip generation by mode is presented in the Table 5.2 of the TA. The development is predicted to generate an approximate 4 two-way vehicle trips during the AM and 4 two-way vehicle trips during the PM peaks respectively. Rail/underground trips account for 15 two-way and 11 two-way trips during the AM and PM periods respectively. These additional trips will not create any material impacts on the public transport and highway networks.</p> <p>In summary, the Transport Assessment has demonstrated to the transport officer's satisfaction that the additional trips generated by the development can be accommodated within the capacity of the local public transport services and no material impacts on the highway impacts will be created.</p>	Mode	% Mode Share	AM Peak			PM Peak			Daily Flows			In	Out	Total	In	Out	Total	In	Out	Total	Rail	48%	3	11	14	7	4	10	59	58	117	Train	4%	0	1	1	1	0	1	5	5	10	Bus	18%	1	4	5	3	1	4	22	22	44	Motorcycle	1%	0	0	0	0	0	0	1	1	2	Car	17%	1	4	5	2	1	4	21	20	41	Car share	1%	0	0	0	0	0	0	1	1	2	Bicycle	5%	0	1	1	1	0	1	6	6	12	On foot	5%	0	1	1	1	0	1	6	6	12	Other	1%	0	0	0	0	0	0	1	1	2	Total People	100%	6	22	28	14	7	21	124	121	244	
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Stakeholder	Comments	Response
	<p data-bbox="443 233 726 264">Access and Parking</p> <p data-bbox="443 306 1814 631">Pedestrian and cycle access will be taken via the new east-west link, which runs through the site, connecting Crawley Road and Downhill Road. This new link fulfils a requirement of the Site Allocations DPD SA60 and it is therefore welcomed. It is noted that a share-surface is being proposed for the new link. This is acceptable in principle but given that this will be a route that is heavily utilised by the public, including blind and partially sighted people, the design of and materials for this link will need to include appropriate features that adequately caters for the needs of such vulnerable users. Additionally, the shared surface through the site provides a cycle route through the site, connecting Crawley Road to Downhills Way and the existing north-south and east-west cycle routes through Lordship Recreation Ground.</p> <p data-bbox="443 673 1808 959">The proposal includes on-site parking, which consists of integral garages for the larger family units and additional spaces interspersed in the new shared surface link. There is some ambiguity regarding the parking provision. The number of spaces stated in the Transport Assessment does not match the spaces shown on the submitted Ground Floor Site Plan. However, it is assumed that the parking provision is as presented on the ground floor site plan. There are 11 no. integral garages and 4 no. spaces (P08, P09, P10 and P18) shown on the ground floor site plan. This equates to 15 no. parking spaces and not 16 no. parking spaces as stated in the Transport Assessment.</p> <p data-bbox="443 1002 1808 1398">The ratio of parking to residential units is 0.52. This is broadly the same as the mean cars per household (0.54) for West Green Ward (Census 2011) and the assumption made is that that the level of car parking matches the likely parking demand of the development. This is a reasonable assumption, but it is not necessarily an accurate reflection of the likely demand of the development. Given the number of family-sized units in this development, there is a potential for a higher parking demand than the means car per household for the ward and as such, some overspill parking is anticipated. The applicant will need to undertake a parking stress survey to demonstrate that there is adequate spare capacity to accommodate any overspill parking demand, albeit that the anticipated overspill demand is likely to be small. It should be understood that the proposed development does not meet the conditions for a car-free/ permit-free development according to Haringey Policy DM32, and as such there is a presumption that any</p>	

Stakeholder	Comments	Response
	<p>parking demand will be catered for within the curtilage of the development.</p> <p>The TA states that 1 no. accessible parking space is provided, equating to 3% from the outset, and a further 1 no. parking space will be safeguarded for the future if required. The location of these spaces are not shown on the submitted plan.</p> <p>Except for one car parking space that is accessed directly from Crawley Road, access to the proposed parking spaces is via the new shared surface road. This is generally acceptable but typically the Transport Assessment would include swept path diagrams to show that adequate turning and manoeuvring space is achieved. This is not included in the TA. However, the width of the new link/access road indicated that it is suited for accessing the proposed parking.</p> <p>It is noted that there is no vehicle access from the western end of the new link through the site, Downhills Way, and as such there is no through vehicle access from Crawley Road to Downhills Way. The level of vehicle movement and turning along the link will therefore be limited, which will preserve this space as a pedestrian and cycle friendly street. There is a turning head along the link. It is anticipated that vehicles making deliveries and servicing the development will use this turning head, and as such, a swept path diagram for the largest vehicles that are expected to use this space, will need to be provided.</p> <p>The new link through the site aligns with the Council's overarching objectives for improved pedestrian and cycling connectivity and permeability in the borough. However, we are uneasy about integral garages because these tend to become storage space over time and in this case, it might eventually result in vehicles parallel parking along the new shared surface link, which would change the character of this new street and undermine its quality and desirability as a pedestrian and cycle route. So we will require an appropriate enforcement and management regime to be implemented during operation of the development, to ensure that such a situation does not arise. Car parking should be managed, enforced and monitored through a Car Park Management Plan (CPMP).</p> <p>Additionally, the development must include Electric Vehicle Charging Points (EVCP) in accordance with London Plan requirements – a minimum of 20% active and 20% passive EV</p>	

Stakeholder	Comments	Response
	<p>charging points from the outset.</p> <p>Cycle Parking</p> <p>The proposal includes a total of 68 long-stay secure cycle parking spaces. 67 spaces are provided for residential use in two dedicated cycle stores – accessed from Crawley Road and the new shared surface link. One (1) short-stay cycle parking space is provided for visitors. It is assumed that this is accommodated in the public realm. The level of cycle parking meets the Draft London Plan requirements and as such are accepted. However, details of all cycle parking will need to be submitted to the Council for approval prior to implementation of development and a condition to that effect is sought.</p> <p>Delivery and Servicing</p> <p>The delivery and servicing arrangements are described in the Transport Assessment. The predicted delivery trip generation is 6 vehicles per week, which will not create any impacts of consequence on the local highway network. The TA states that large delivery vehicles will turn at the site entrance in Crawley Road and provided a swept path diagram to demonstrate this. In practice, large delivery vehicles will enter the site and attempt to use the turning head on the new street; unless they are prevented from doing so using width restrictions or retractable bollards at the entrance. Naturally, large vehicles reversing or turning on the new street will be unacceptable from the perspective of safety. It is therefore recommended that the applicant submits a Delivery and Servicing Plan (DSP), setting out the provisions and measures that will be implemented to prevent large delivery and refuse vehicles from accessing the new street.</p> <p>The anticipated movements by refuse vehicles are two (2) per week. There are two (2) refuse stores in the development. Refuse vehicles will be able to stop outside the refuse store on the Crawley Road frontage. Collecting refuse from the other refuse store will involve refuse vehicles turning and reversing onto the new street, from Crawley Road. Given the infrequency of the refuse collection, there is no major concern with this arrangement. However, any reversing into the street should be limited to refuse vehicles and accordingly, this will need to be managed. Perhaps the solution is to introduce retractable bollards at the entrance – only permitting refuse</p>	

Stakeholder	Comments	Response
	<p>vehicles to reverse into the new street on collection days. As per the above recommendation, the arrangements for managing vehicle access along the new street will need to be set out in a DSP, to be approved prior to operation of the development.</p> <p>Construction Logistic Plan (CLP)</p> <p>The Council welcomes the submission of a Construction Logistics Plan, which outlines the arrangements for construction logistics, including the routing of construction vehicles, the forecasted construction trip generation and monitoring arrangements. These provisions are acceptable in principle but provides a framework at this time, with the details of the final provisions of the CLP to be coordinated with the surrounding planning consents.</p> <p>The „Construction Logistics Plan“ (CLP), is recommended to be secured as a pre-commencement condition. The applicant can refer to the TfL’s guidance document through this link when compiling this document.</p> <p>The applicant/ Developer is required to submit a final Construction Management Plan (CMP) and Construction Logistics Plan (CLP) for the local authority’s approval 3 months (three months) prior to construction work commencing on site. The Plans should provide details on how construction work (including demolition) would be undertaken in a manner that disruption to traffic and pedestrians on Crawley Road and Downhills Way, and the roads surrounding the site is minimised. It is also requested that construction vehicle movements should be carefully planned and coordinated to avoid the AM and PM peak periods.</p> <p>External Highway Improvements Works</p> <p>Some highway improvements works is necessitated by the development. This includes the footway along the Crawley Road frontage of the development and at the entrance to the new street where it interfaces with Crawley Road. The cost of these improvements will need to be borne by the owner and secured by way of a Section 278 agreement.</p> <p>Additionally, improvements to the external connections between the new street through the site</p>	

Stakeholder	Comments	Response
	<p>and Lordship Recreation Grounds are required. The TA includes a Technical Note that considers two (2) options for linking the new street with the Lordship Recreation Ground. Option 1 proposes to retain the existing pedestrian crossing in Downhills Way, approximately 42m to the north of the existing site entrance. Option 2 proposes to relocate the signalised pedestrian crossing to better align with the new street through the site and pedestrian/cycle desire lines across Downhills Way to Lordship Recreation Ground. The Technical Note concludes that the relocation of the crossing is unviable due to constraints such as conflict with an existing mature tree (London Plane), the culvert, the access to the park and existing vehicle accesses on the park side of Downhills Way. The main disadvantage of retaining the existing crossing in its current location is the potential for pedestrians/cyclist to ignore the new connecting path and cross Downhills Way at the desire line. The solution presented is to use landscaping features to preventing pedestrians and cyclist from taking a shortcut across the verge to cross Downhills Way.</p> <p>The proposed 3m wide pedestrian and cycle path connecting the site to the existing crossing will need to be supported by a Road Safety Audit. Furthermore, the applicant will need to meet the cost of these improvements by way of an agreement pursuant to Section 278 of the Highways Act 1980 or other appropriate legal mechanism.</p> <p>Conclusions</p> <p>In summary, the applicant will need to provide additional information in order to fully assess the development. A parking stress survey will need to be undertaken to demonstrate that there is spare capacity to accommodate any overspill parking demand from the development. The location of accessible car space/s will need to be indicated. Further, a Parking Management Plan setting out the allocation and arrangements for management parking across the site will need to be secured. Swept path diagrams for the largest vehicles expected to use the turning head on the new street, will need to be provided. No significant impacts on the public transport and highway networks are envisaged. Cycle parking is adequate in terms of quantum, but details of cycle parking will need to be conditioned. A Construction Logistics Plan (CLP) detailing the arrangements for mitigating the impacts of the construction traffic will need to be secured by legal agreement. The applicant will be required to enter into a Section 278 Agreement with the Council or other appropriate legal agreement, to pay for any necessary highway improvements works.</p>	

Stakeholder	Comments	Response
	<p data-bbox="443 269 827 305">S.106 Planning Obligations</p> <p data-bbox="443 342 1776 448">On assessing this application, we have concluded that subject to the following S.106 obligation and conditions the transportation planning and highways authority would not object to this application</p> <p data-bbox="489 488 743 521">Car Club Scheme</p> <ol data-bbox="443 529 1814 1398" style="list-style-type: none"> <li data-bbox="443 529 1814 740">1. Establishment or operation of a car club scheme, the developer must offer two years" free membership and £50 credit to all new residents. Reason: To mitigate the parking demand generated by this development proposal on the local highways network by constraining car ownership and subsequent trips generated by car, resulting in increased travel by sustainable modes of transport hence reducing the congestion on the highways network. <li data-bbox="443 781 1814 1325">2 Section 278 Highway Act 1980 The owner shall be required to enter into agreement with the Highway Authority under Section 278 of the Highways Act, in no less than three (3) months prior to occupation of the development, to pay for any necessary highway works, which includes if required, but not limited to, footway improvement works, access to the Highway, measures for street furniture relocation, carriageway markings, and access and visibility safety requirements. Unavoidable works required to be undertaken by Statutory Services will not be included in the Highway Works Estimate or Payment. In addition, the cost estimate is based on current highways rates of the permanent highways scheme. The developer will be required to provide details of any temporary highways scheme required to enable the occupation of each phase of the development, which will have to be costed and implemented independently of this cost estimate. The cost of the S.278 works must be indexed linked and reviewed annually or before the implementation of each phase of the highway works. Reason: To implement the proposed highways works to facilitate future access to the development site. <li data-bbox="443 1365 947 1398">3 Construction Management Plan. 	

Stakeholder	Comments	Response
	<p>The applicant/ Developer is required to submit a Construction Management Plan (CMP) and Construction Logistics Plan (CLP) for the local authority's approval 3 months (three months) prior to construction work commencing on site. The Plans should provide details on how construction work (Inc. demolition) would be undertaken in a manner that disruption to traffic and pedestrians on the High Road, Bury Road and the roads surrounding the site is minimised. It is also requested that construction vehicle movements should be carefully planned and coordinated to avoid the AM and PM peak periods, the plans must take into consideration other site that are being developed locally and were possible coordinate movements to and implement also measures to safeguard and maintain the operation of the local highway network.</p> <p>Reason: to ensure that the impacts of the development proposal on the local highways network are minimised during construction, and to coordinate construction activities in key regeneration areas which will have increased construction activities.</p> <p>4. Car Parking Management Plan</p> <p>The applicant will be required to produce a Car Parking Management Plan which must include details of the allocation and management of the on-site car parking spaces, including the accessible parking spaces. The car parking spaces must be allocated in order of the following priorities regardless of tenure (Private/ affordable):</p> <p>Reason: To ensure that the allocation of the off street car parking spaces is in line with the Council's development management DMPD Policy DM 32 which seeks to priorities parking to family sized units.</p> <p>Conditions:</p> <ol style="list-style-type: none"> 1. Cycle parking <p>Prior to implementation, full details of the cycle (including the type, dimensions and method of security and access) shall be submitted in writing to and approved by the Local Planning Authority.</p> <p>Reason: to promote sustainable transport.</p> 2. Electric Charging Points 	

Stakeholder	Comments	Response
	<p>The applicant will be required to provide a total of 20% of the total number of car parking spaces with active electric charging points, with a further 20% passive provision for future conversion.</p> <p>Reason: To comply with the Further Alteration to the London Plan and the London, and reduce carbon emission in line with the Council's Local Plan Policy SP4.</p> <p>3. Delivery and Servicing Plan</p> <p>The owner shall be required to submit a Delivery and Servicing Plan (DSP) for the local authority's approval. The DSP must be in place prior to occupation of the development. The Delivery and Servicing Plan must include a Waste Management Strategy for the site, prepared in line with the Council's Waste Management service, setting out details of how refuse is to be collected from the site, and ensuring that all bins are within 10 metres carrying distance of refuse collection vehicles on waste collection days.</p> <p>Reason: To ensure that the development does not prejudice the free-flow of traffic or public safety along the neighbouring highway.</p>	
Housing	<p>Housing have been fully involved in the development of this project.</p> <p>Whilst we would have hoped for the affordable to be delivered wholly on site, we are happy with the quality of what is being offered and can utilise the £230k in the delivery of other social housing through the delivery programme.</p> <p>Overall Housing is happy with the design and development of the scheme.</p>	Comments noted.
SUDS (Drainage) Officer	<p>We confirm we have no objection to this application going forward and welcome the inclusion of a green roof on block B, subject to the following proposed condition:-</p> <p>Prior to installation, a green roof plan shall be submitted in writing to and for approval by the Local Planning Authority.</p>	Comments noted. Condition attached in respect of a green roof

Stakeholder	Comments	Response				
	<p>The plan shall include a roof plan identifying where the roof will be located, confirmation of the substrate depth ranges across the roof.</p> <p>Details of an ongoing management maintenance plan for the roof that must be for the lifetime of the development. The development shall be carried out in accordance to the approved plans.</p> <p>Reason: To ensure the development provides maximum provision towards the habitat creation for biodiversity and supports the drainage strategy for the development.</p> <p>NB. The drainage information previously provided, detailed drawings, drainage layout, management maintenance plan are accepted.</p>	<p>and drainage management and maintenance.</p>				
<p>Carbon Management</p>	<p>Energy – Overall The scheme delivers a 35.96% improvement beyond Building Regulations 2013. The policy requirement is 35% improvement beyond Building Regulations 2013.</p> <p>The applicant is required to pay a contribution of £54,410.40 carbon offset fund as the site did not meet the Zero Carbon Target. The site has a shortfall to zero carbon of 30.228 T/CO₂.</p> <p>Energy – Lean The applicant has proposed an improvement of beyond Building Regulations by 2.25 % through improved energy efficiency standards in key elements of the build. While this is not best practice it is policy compliant and a positive.</p> <div style="border: 1px solid black; padding: 5px; margin-top: 10px;"> <p>Suggested Condition: You must deliver the energy efficiency standards (the Lean) as set out in the approved Energy Strategy, by NRG Consulting, dated March 2019.</p> <table border="1" style="width: 100%; margin-top: 10px;"> <thead> <tr> <th style="width: 50%;">Building Element</th> <th style="width: 50%;">Proposed specification for the development (u-values)</th> </tr> </thead> <tbody> <tr> <td style="height: 20px;"></td> <td></td> </tr> </tbody> </table> </div>	Building Element	Proposed specification for the development (u-values)			<p>Comments noted. Conditions and legal agreement clauses included.</p>
Building Element	Proposed specification for the development (u-values)					

Stakeholder	Comments	Response										
	<table border="1" data-bbox="533 233 1566 423"> <tr> <td data-bbox="533 233 1003 271">External walls</td> <td data-bbox="1003 233 1566 271">0.18 (domestic))</td> </tr> <tr> <td data-bbox="533 271 1003 308">Roof</td> <td data-bbox="1003 271 1566 308">0.13 (domestic)</td> </tr> <tr> <td data-bbox="533 308 1003 345">Ground floor</td> <td data-bbox="1003 308 1566 345">0.13</td> </tr> <tr> <td data-bbox="533 345 1003 383">Windows</td> <td data-bbox="1003 345 1566 383">1.4</td> </tr> <tr> <td data-bbox="533 383 1003 423">Air tightness</td> <td data-bbox="1003 383 1566 423">5 m³/hr/m² for domestic</td> </tr> </table> <p data-bbox="457 464 1724 716">The development shall then be constructed and deliver the U-values set out in this document. Achieving the agreed carbon reduction of 2.25 % beyond BR 2013. Confirmation that these energy efficiency standards and carbon reduction targets have been achieved must be submitted to the local authority at least 6 months of completion on site for approval. This report will show emissions figures at design stage to demonstrate building regulations compliance, and then report against the constructed building. The applicant must allow for site access if required to verify measures have been installed.</p> <p data-bbox="457 756 1703 862">If the targets are not achieved on site through energy measures as set out in the afore mentioned strategy, then any shortfall should be offset at the cost of £1,800 per tonne of carbon plus a 10% management fee.</p> <p data-bbox="457 902 1535 935">Reason: To comply with London Plan Policy 5.2. and local plan policy SP:04</p> <p data-bbox="443 976 1010 1049">Energy – Clean The scheme proposes individual boilers.</p> <div data-bbox="443 1081 1745 1341" style="border: 1px solid black; padding: 5px;"> <p data-bbox="457 1089 1052 1122">Suggested Condition for individual boilers:</p> <p data-bbox="457 1122 1724 1268">That all combination gas boilers that are to be installed across the development are to have a minimum SEDBUK rating of 91%. The applicant will demonstrate compliance by supplying installation specification at least 3 months post construction. Once installed they shall be operated and maintained as such thereafter.</p> <p data-bbox="457 1308 1535 1341">Reason: To comply with London Plan Policy 5.2. and local plan policy SP:04</p> </div> <p data-bbox="443 1382 667 1414">Energy – Green</p>	External walls	0.18 (domestic))	Roof	0.13 (domestic)	Ground floor	0.13	Windows	1.4	Air tightness	5 m ³ /hr/m ² for domestic	
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Stakeholder	Comments	Response
	<p>That application has reviewed the installation of various renewable technologies.</p> <p>PV Panels - They have concluded that approximately 108 no. PV panels with 37.26Wp would produce regulated CO2 savings of approximately 33.71%. These are fitted onto roof space on the block and town house roofs.</p> <div data-bbox="443 451 1709 1183" style="border: 1px solid black; padding: 5px;"> <p>Suggested condition You will install the renewable energy technology (PV Solar Panels) as set out in the approved Energy Strategy, by NRG Consulting, dated March 2019.</p> <p>The applicant will deliver no less than 108 no. solar PV panels, with 37.26kWp.</p> <p>Should the agreed target not be able to be achieved on site through energy measures as set out in the afore mentioned strategy, then any shortfall should be offset at the cost of £1,800 per tonne of carbon plus a 10% management fee.</p> <p>The Council should be notified if the applicant alters any of the measures and standards set out in the submitted strategy (as referenced above). Any alterations should be presented with justification and new standards for approval by the Council.</p> <p>The equipment shall be maintained as such thereafter. Confirmation of the area of PV, location and kWp output must be submitted to the local authority at least 6 months of completion on site for approval and the applicant must allow for site access if required to verify delivery.</p> <p>Reason: To comply with London Plan Policy 5.7. and local plan policy SP:04</p> </div> <p>Sustainability Assessment The applicant has submitted a Sustainability Assessment within their Energy Strategy. Haringey proposes the applicant undertakes a Home Quality Mark and achieves a level 3 outcome.</p> <div data-bbox="443 1365 1749 1403" style="border: 1px solid black; padding: 2px;"> <p>Suggested condition:</p> </div>	

Stakeholder	Comments	Response
	<p>You must deliver the sustainability assessment as set out in the approved Energy Strategy, by NRG Consulting, dated March 2019.</p> <p>The development shall then be constructed in strict accordance of the details so approved and shall achieve the rating of Home Quality mark level 3 for all units on the site and shall be maintained as such thereafter. A post construction certificate shall then be issued by an independent certification body, confirming this standard has been achieved. This must be submitted to the local authority at least 6 months of completion on site for approval.</p> <p>In the event, the development fails to achieve the agreed rating for the whole development, a full schedule and costings of remedial works required to achieve this rating shall be submitted for our written approval with 2 months of the submission of the post construction certificate. Thereafter the schedule of remedial works must be implemented on site within 3 months of the local authority's approval of the schedule, or the full costs and management fees given to the Council for offsite remedial actions.</p> <p>Reasons: In the interest of addressing climate change and to secure sustainable development in accordance with London Plan (2011) polices 5.1, 5.2,5.3 and 5.9 and policy SP:04 of the Local Plan.</p> <p>Overheating Risk The thermal model submitted shows that no units are at risk from overheating in current weather patterns. The design measures undertaken are minimizing hot water pipework, installing individual heating systems, improved g-values, designing in the stack effect and having openable windows.</p> <p>Suggested Condition You must deliver the development in line with the approved overheating assessment as set out in the Overheating Assessment, by NRG Consulting, dated March 2019. The development shall be maintained as such thereafter and no change shall take place without the prior written consent of the Local Planning Authority.</p>	

Stakeholder	Comments	Response
	<p data-bbox="443 233 1709 305">REASON: London Plan Policy 5.9 and local policy SP:04 and in the interest of adapting to climate change and to secure sustainable development.</p> <p data-bbox="443 347 1787 451">EV charge points The Applicant has advised the 20% of spaces will be fitted with Active electric Vehicle Charging Points (ECVPS) with a further 20% passive provision as required by the London Plan.</p> <p data-bbox="443 493 1814 672">Suggested Condition You must deliver the development in line with the approved overheating assessment as set out in the Overheating Assessment, by NRG Consulting, dated March 2019. The development shall be maintained as such thereafter and no change shall take place without the prior written consent of the Local Planning Authority.</p> <p data-bbox="443 711 1709 782">REASON: London Plan Policy 5.9 and local policy SP:04 and in the interest of adapting to climate change and to secure sustainable development.</p> <p data-bbox="443 821 751 854">Additional comments:</p> <p data-bbox="443 893 1226 925">We would recommend adding this green roof condition:</p> <p data-bbox="443 964 1814 1036">That prior to commencement on site details on the living roof shall submitted to the local authority for approval. This will include the following:</p> <ul data-bbox="506 1075 1801 1399" style="list-style-type: none"> i) A roof(s) plan identifying where the living roofs will be located; j) Confirmation that the substrates depth range between 120 and 150mm across all the roof(s); k) Details on the diversity of substrate depths across the roof to provide contours of substrate. This could include substrate mounds in areas with the greatest structural support to provide a variation in habitat; l) Details on the diversity of substrate types and sizes; m) Details on bare areas of substrate to allow for self-colonisation of local windblown seeds and invertebrates; 	

Stakeholder	Comments	Response
	<p>n) Details on the range of native species of wildflowers and herbs planted to benefit native wildlife. The living roof will not rely on one species of plant life such as Sedum (which are not native);</p> <p>o) Details of the location of log piles / flat stones for invertebrates; and,</p> <p>p) Details of the management plan (including access) to ensure that the Living Roof sustains itself.</p> <p>The living roof will not be used for amenity or sitting out space of any kind. Access will only be permitted for maintenance, repair or escape in an emergency.</p> <p>The living roof (s) shall then be carried out strictly in accordance with the details approved by the Council. And shall be maintained as such thereafter.</p> <p>Reason: To ensure that the development provides the maximum provision towards the creation of habitats for biodiversity and supports the water retention on site during rainfall. In accordance with regional policies 5.3, 5.9 and 5.11 of the London Plan (2016) and Local Plan policy SP:05 and SP:13.</p>	
Pollution	<p>Air Quality</p> <p>The following document have been reviewed as part of this internal consultation</p> <ul style="list-style-type: none"> • The plans and relevant documents • Consultations • Air Quality Assessment with Dust and Emissions Assessment (ref. PP1457/AQ/CR/201903-RT), prepared by NRG in March 2019; • Energy Statement (ref. PP1457/ES/CR/201903-RT), prepared by NRG. <p>The review of the documents submitted revealed the following:</p> <p>Emission sources include; (1) emissions from site enabling, earthworks and construction works,</p>	<p>Comments noted. Conditions included.</p>

Stakeholder	Comments	Response
	<p>(2) local traffic emissions once the development has been completed- 16 parking spaces (11 of which would be garages) are proposed and (3) from boilers. All gas fired boilers will meet a minimum standard of <40mgNOx/kWh. This is in accordance with the London SPG for Sustainable Design and Construction.</p> <p>A qualitative assessment on the construction phase activities has been carried out following the Mayor of London's SPG the IAQM „Guidance on the Assessment of Dust from Demolition and Construction". The risk of dust raising activities towards dust soiling was considered to be „Low to Medium Risk", that towards human health impact were considered to be „Low Risk".</p> <p>Following proper implementation of the mitigation measures recommended, the impact of emissions during demolition and construction is likely to be „Not Significant".</p> <p>Air quality conditions for residents within the proposed development have also been considered. Pollutant concentrations are predicted to be below the air quality objectives at the worst-case locations assessed (Ground Floor), and air quality conditions for new residents would be acceptable, and the air quality impacts on the proposed development will be „Insignificant".</p> <p>Based on the anticipated energy usage at the site the building-related emissions have been demonstrated to be air quality neutral, however the transport-related emissions are not air quality neutral.</p> <p>As such, the following mitigation measures are recommended:</p> <ul style="list-style-type: none"> • The provision of at least 2 Electric Vehicle (EV) "rapid charge" point per 10 residential dwellings. Where on-site parking is provided for residential dwellings, EV charging points for each parking space should be made; • Provision of a travel plan (with provision to measure its implementation and effect) which sets out measures to encourage sustainable means of transport (public, cycling and walking) to be conditioned upon planning approval or included as a S106 obligation. <p>The Development would alter traffic very slightly, and in combination with the proposed heating</p>	

Stakeholder	Comments	Response
	<p>system, could potentially change local air quality in terms of NO² and particulate matter (PM10 and PM2.5) concentrations. However, on completion of the Development, and considering uncertainty in future reductions of nitrogen oxides (NOx) and NO₂, the Development is predicted to have an insignificant effect on NO₂, PM₁₀ and PM_{2.5} concentrations within, and surrounding the Site. The overall effect of the Development on air quality would therefore be insignificant.</p> <hr/> <p>The following comments can be made on the Air Quality Assessment.</p> <ul style="list-style-type: none"> • the potential impacts of neighbouring sources on the site, even if an assessment of impacts of the development on the surrounding area is screened out should be made. Consideration should be given to all the potential impacts of neighbouring sources on the site; • the traffic data used in the modelling should be approved by TFL and evidence provided to the council and • The Air quality impacts of the entire development site, including nearby junctions, developments - including site wide gas boilers should ideally be re-modelled using ADMS-Urban providing source apportionment and indication of the re-circulating flow around the proposed buildings. <p>The air quality is generally acceptable. However, the report should be updated to reflect the comments made.</p> <p>Contaminated land:</p> <p>Desk Study Report, referenced GE17944-DSR-FEB19, dated February 2019 by Geo-Environmental Services Limited for Land Off Downhills Way & Crawley Road, Wood Green, London, N22 6AG. The report comprises a desk study of geotechnical and geo-environmental factors pertaining to the site, including a review of available historic maps and an examination of other available sources of geo-environmental information. The historic and current trade entries indicate that several industrial or potentially contaminative land uses have been identified on or near the site within the desk study, including the adjacent land to the immediate south of the site</p>	

Stakeholder	Comments	Response
	<p>(e.g. Barber and Wilsons Co., a garage, engineering works and a ground mounted electrical transformer located c.25m to the southwest).</p> <p>An intrusive investigation work was recommended in the report to identify the possible presence, nature and extent of any contamination within the ground and to assess contamination risk to the receptors identified such as human health, controlled waters, built environment, soft landscaping The investigation should be designed to provide clarity on the geological and hydrogeological setting and any associated liabilities and constraints to development</p> <p>The findings and recommendations made in the report are generally acceptable.</p> <hr/> <p>I recommend the following conditions:</p> <p>Air Quality:</p> <p>Part A: All measures identified within the approved air quality assessment that are to be installed during the course of the development will be fully implemented. No occupation will take place until a report demonstrating that each measure is fully implemented has been provided to the satisfaction of and approved in writing by the Planning Authority.</p> <p>Part B: All measures identified within the approved air quality assessment that will be implemented or continue to be implemented after the completion of the development will be completed within agreed timescales. A report demonstrating that all such measures set out within the approved air quality assessment has been installed will be provided to the satisfaction of and approved in writing by the Planning Authority.</p> <p>Part C: No development works will take place until a travel plan in line with practice guidance and other guidance provided by the Council has been submitted and approved in writing by the Local Planning Authority.</p>	

Stakeholder	Comments	Response
	<p>Reason: To protect air quality and people’s health by ensuring that the production of air pollutants, such as nitrogen dioxide and particulate matter, are kept to a minimum during the course of building works and during the lifetime of the development. To contribute towards the maintenance or to prevent further exceedances of National Air Quality Objectives.</p> <p>Contaminated land: (CON1 & CON2)</p> <p>CON1:</p> <p>Before development commences, other than for investigative work and demolition:</p> <ul style="list-style-type: none"> a) Using information obtained from 2019 Desk Study Report by Geo-Environmental Services Limited plus maps an intrusive site investigation, sampling and analysis shall be undertaken. The investigation must be comprehensive enough to enable: - a risk assessment to be undertaken, refinement of the Conceptual Model, and the development of a Method Statement detailing the remediation requirements. The risk assessment and refined Conceptual Model shall be submitted, along with the site investigation report, to the Local Planning Authority. b) If the approved risk assessment and approved refined Conceptual Model indicate any risk of harm, a Method Statement detailing the remediation requirements, using the information obtained from the site investigation, and also detailing any post remedial monitoring shall be submitted to, and approved in writing by, the Local Planning Authority prior to that remediation being carried out on site. <p>Reason: To ensure the development can be implemented and occupied with adequate regard for environmental and public safety.</p>	

Stakeholder	Comments	Response
	<p>And CON2:</p> <ul style="list-style-type: none"> • Where remediation of contamination on the site is required completion of the remediation detailed in the method statement shall be carried out and a report that provides verification that the required works have been carried out, shall be submitted to, and approved in writing by the Local Planning Authority before the development is occupied. <p>Reason: To ensure the development can be implemented and occupied with adequate regard for environmental and public safety.</p> <p>Management and Control of Dust:</p> <ul style="list-style-type: none"> • No works shall be carried out on the site until a detailed Air Quality and Dust Management Plan (AQDMP), detailing the management of demolition and construction dust, has been submitted and approved by the LPA. The plan shall be in accordance with the GLA SPG Dust and Emissions Control and shall also include a Dust Risk Assessment. <p>Reason: To Comply with Policy 7.14 of the London Plan</p> <ul style="list-style-type: none"> • Prior to the commencement of any works the site or Contractor Company is to register with the Considerate Constructors Scheme. Proof of registration must be sent to the LPA. <p>Reason: To Comply with Policy 7.14 of the London Plan</p> <p>Combustion and Energy Plant:</p> <ul style="list-style-type: none"> • Prior to installation details of the gas boilers to be provided for space heating and domestic hot water should be forwarded to the Local Planning Authority. The boilers to be provided for space heating and domestic hot water shall have dry NOx emissions 	

Stakeholder	Comments	Response
	<p>not exceeding 40 mg/kWh (0%).</p> <p>Reason: As required by The London Plan Policy 7.14.</p> <p>NRMM</p> <ul style="list-style-type: none"> No works shall commence on the site until all plant and machinery to be used at the demolition and construction phases have been submitted to, and approved in writing by, the Local Planning Authority. Evidence is required to meet Stage IIIA of EU Directive 97/68/ EC for both NOx and PM. No works shall be carried out on site until all Non-Road Mobile Machinery (NRMM) and plant to be used on the site of net power between 37kW and 560 kW has been registered at http://nrmm.london/. Proof of registration must be submitted to the Local Planning Authority prior to the commencement of any works on site. <p>Reason: To protect local air quality and comply with Policy 7.14 of the London Plan and the GLA NRMM LEZ.</p> <ul style="list-style-type: none"> An inventory of all NRMM must be kept on site during the course of the demolitions, site preparation and construction phases. All machinery should be regularly serviced and service logs kept on site for inspection. Records should be kept on site which details proof of emission limits for all equipment. This documentation should be made available to local authority officers as required until development completion. <p>Reason: To protect local air quality and comply with Policy 7.14 of the London Plan and the GLA NRMM LEZ.</p> <p>As an informative: Prior to demolition of existing buildings, an asbestos survey should be carried out to identify the location and type of asbestos containing materials. Any asbestos containing materials must be removed and disposed of in accordance with the correct procedure prior to any demolition or construction works carried out.</p>	

Stakeholder	Comments	Response
<p>Waste Management Officer</p>	<p>This application will need the following</p> <p>BLOCK A:</p> <ul style="list-style-type: none"> 1 x 1100L waste receptacle for refuse 1 x 1100L waste receptacle for dry recycling 1 x 140L food waste external box 7 x food waste kitchen caddy <p>BLOCK B:</p> <ul style="list-style-type: none"> 2 x 1100L waste receptacles for refuse 1 x 1100L waste receptacle for dry recycling 1 x 140L food waste external box 12 x food waste kitchen caddy <p>Houses:</p> <p>Each house will require the following</p> <ul style="list-style-type: none"> 1 x 240L refuse bin 1 x 240L recycling bin 1 x 25 litter food waste container 1 x garden/green waste receptacle (This is a subscription service) <p>Any Commercial enterprise must make arrangements for a scheduled waste collection with a Commercial Waste Contractor will be required.</p> <p>The business owner will need to ensure that they have a cleansing schedule in place and that all waste is always contained.</p>	<p>Comments noted. Waste provision appears to match or exceed these requirements but further details shall be secured by condition.</p>

Stakeholder	Comments	Response
	<p>Waste storage and collection must be separated from residential requirements</p> <p>Commercial Business must ensure all waste produced on site are disposed of responsibly under their duty of care within Environmental Protection Act 1990. It is for the business to arrange a properly documented process for waste collection from a licensed contractor of their choice. Documentation must be kept by the business and be produced on request of an authorised Council Official under section 34 of the Act. Failure to do so may result in a fixed penalty fine or prosecution through the criminal Court system.</p> <p>All 1100L waste receptacles must be with 10 metres and wheelie bins within 25 metres of waste collection vehicle on day of collection.</p> <p>The above planning application has been given a RAG traffic light status of GREEN for waste storage and collection.</p>	
Building Control	No comments to make.	Noted.
Regeneration	No comments to make.	Noted.
Noise Specialist	<p>I have examined the acoustic assessment report (Ref: PP1457/NA/CR/201903-RT) dated 14th March 2019 produced by Mr Ryan Thrower of NRG Consulting. The document confirms the following;</p> <ol style="list-style-type: none"> 1) Internal noise levels within habitable rooms will be designed in accordance with BS8233:2014. 2) Both standard gas fired boilers and the mechanical extract/ventilation systems will have a low noise impact on the nearest noise sensitive receptors. 	Comments noted. A condition has been included to secure these requirements and Agent of Change

Stakeholder	Comments	Response
	<p>There are no objections made in principle to this development.</p> <p>Advisory As the proposed development involves a change of use adjacent to commercial garages, the applicant should be mindful of their responsibilities under the “agent of change principles”.</p> <p>Additional comments:</p> <p>I have reviewed the Lighting Report provided in respect of the attached and have no concerns regarding the potential for light nuisance from the scheme proposed.</p>	<p>principles were considered during the assessment of the application.</p>
Economic Development	<p>In principle, I have no objection to the proposed redevelopment as the site is not a designated employment site.</p> <p>However, I wish you to note my wider concern that the proposed redevelopment entails loss of employment space.</p> <p>Nonetheless, in compliance with the Borough Plan, we need to secure socio-economic benefits from the redevelopment by requiring the developer to use local contractors and to offer opportunities for skilling, training and take up of apprenticeships. In addition, to meet the Council priority of providing digital infrastructure which facilitates regeneration and economic development all new developments in regeneration areas need to provide ultrafast infrastructure and connections to comply with Planning Policy DM54. Developers should therefore include appropriately designed ducts/risers/access points to their sites and across their sites.</p> <p>The Economic Development Team can provide the developer with a list of specialist consultants that could provide advice new build/broadband infrastructure related matters</p>	<p>Comments noted. Local labour initiatives are secured through legal agreement.</p>
Emergency	<p>I have no comments on this application.</p>	<p>Noted.</p>

Stakeholder	Comments	Response
Planning		
Nature and Conservation team	No comments to make.	Noted.

EXTERNAL		
<p>Financial Viability Consultant (DVS)</p>	<p>Initial comments (Summary and Conclusion only – full report online):</p> <p>6.0 Development Viability</p> <p>6.1 The position presented by the agent of the viability of the proposed scheme (22x Private units and 7x Affordable units) demonstrates a residual land value of £2,108,130 which has been compared to a Benchmark Land Value of £2,750,000. The agent therefore states that in addition to S106 and CIL obligations the site is unable to support Affordable Housing in excess of what has already been offered.</p> <p>6.2 Adopting the inputs I have outlined above, my residual value of the proposed scheme with 7 Affordable units (20% Affordable Housing) demonstrates a residual land value of £2,950,457 which compared to a Benchmark Site Value of £2,750,000 demonstrates the scheme can viably support the provision of 7 Affordable units and provide a surplus of £200,457 which the Council may wish to consider.</p> <p>7.0 Conclusion</p> <p>7.1 The main areas of difference in our report are the sales values, ground rents, build costs, contingency and Profit. This leads to the proposed scheme being more viable in my appraisal than the agent contends.</p> <p>7.2 I trust that the above viability review is clear. You may have queries on a number of the issues I have raised, and I would be pleased to provide further information if you require this.</p> <p>Additional comments (Summary only – full report online):</p> <p>Summary</p>	<p>Comments noted. The Council has negotiated improvements to the affordable housing provision above the „maximum viable“ position.</p>

	<p>Based on the amendments above, my residual value of the proposed scheme with 7 Affordable units (20% Affordable Housing) demonstrates a residual land value of £2,789,631, which compared to a Benchmark Land Value of £2,750,000 demonstrates the scheme can viably support the provision of 7 Affordable units and provide a surplus of £39,631 which the Council may wish to consider.</p> <p>Based on the further reasoning outlined in this addendum, I consider that the scheme can support the provision of 7 Affordable units. If the agent wishes to provide additional supporting information, I am happy to review this.</p>	
<p>Environment Agency</p>	<p>We object to this application as it involves building within 8 metres of the culverted Moselle Brook. As submitted, it is unlikely that we would grant a flood risk activity permit for this application.</p> <p>Reasons</p> <p>1. Flood Risk</p> <p>The proposed development is likely to adversely affect the construction and stability of the culvert which will compromise its function. The proposal will therefore increase the risk of flooding to properties within the vicinity of the site, including Downhills Way, Crawley Road, and Boundary Road.</p> <p>2. Biodiversity</p> <p>The proposed development may prevent the reversal of a substantial loss of watercourse habitat due to the existing culvert. There is a significant risk that the development will prevent achievement of good ecological potential in the Moselle Brook water body. The proposals have failed to restore the value of the watercourse or explore the feasibility of de-culverting the Moselle Brook.</p>	<p>Comments noted. Conditions included.</p>

This objection is supported by paragraphs 170 and 175 of the National Planning Policy Framework (NPPF) which recognise that the planning system should conserve and enhance the environment by minimising impacts on and providing net gains for biodiversity. If significant harm resulting from a development cannot be avoided, adequately mitigated, or as a last resort compensated for, planning permission should be refused. Opportunities to incorporate biodiversity in and around developments should be encouraged.

Supporting Policy

This application forms the central part of Site Allocation 60 (SA60) of your adopted Site Allocations Development Plan Document (2017). A site requirement of SA60 is to „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.“ The development guidelines state „The Moselle river runs in a culvert along the eastern boundary of the site. The opportunity to deculvert this should be explored in line with SP5.“

Your adopted Local Plan Strategic Policy SP5 states that „the Council will require all development in Haringey to be water efficient during construction and operation and to reduce all forms of flood risk. All development shall: Restore and enhance the Blue Ribbon Network including Pymmes Brook, Moselle Brook, the River Lee and its tributaries, de-culverting wherever feasible, to improve water quality and amenity of these waterways and to help reduce flood risk (in line with London River Action Plan).“

The adopted Local Plan Development Management Policy DM28 states (...) „all major development will be required to and minor development should: (...) Investigate and secure the implementation of measures to restore culverted sections of the river or watercourse.“ Furthermore, your Biodiversity Action Plan states that “There are limited opportunities to improve or increase this habitat due to the built up nature of the Borough but planning policy offers a degree of protection from further development along watercourses and the Council seeks to promote river corridors as important areas of open land. This includes seeking to

restore and enhance natural elements of the river environment through actions such as de-culverting and/or naturalisation, and contributing towards the conservation and enhancement of the ecology of all rivers and the floodplain.”

The Thames River Basin Management Plan (RBMP) states that the water environment should be protected and enhanced to prevent deterioration and promote the recovery of water bodies. Additionally, the Water Framework Directive has a specific action attached to this watercourse “Seek de-culverting on the Moselle Brook as part of development where feasible.”

In light of the above we believe the applicant should assess the feasibility of de-culverting the Moselle Brook through this section.

Overcoming our objection

1. Flood Risk The applicant can overcome this element of our objection by either relocating the proposed structures 8m away from the edge of the culvert; OR demonstrating that the culvert defence structure can withstand any loading from the proposed new structure. This requires both a structural assessment of the current condition of the culvert, demonstrating that either it will be safe for the life of the development or stating what repair works will be necessary to make it safe for the life of the development. A loading assessment should also be submitted, demonstrating no load will be placed on the culvert by the proposed development.

2. Biodiversity The applicant can overcome this element of our objection by initially submitting a feasibility study into the de-culverting of the Moselle Brook. This initial study will inform future decisions regarding the development.

Advice to Applicant

Regarding future applications, if you would like us to review a revised technical report prior to a formal submission, outside of a statutory consultation, and/or meet to discuss our position, this will be chargeable in line with our planning

advice service. If you wish to request a document review or meeting, please contact our team email address at HNLsustainableplaces@environment-agency.gov.uk.

Final Comments

Thank you for contacting us regarding the above application. Our comments are based on our available records and the information submitted to us. Please quote our reference number in any future correspondence.

If you are minded to approve this planning application, contrary to our advice, please contact us prior to doing so.

Additional Comments:

We have received and reviewed the following additional information in association with the above referenced planning application.

Moselle Culvert, Wood Green. Revision – B. Options for De-culverting. Prepared by DOA consulting structural engineers. Dated: 16/05/19.

– Thames Region. Prepared by Harclow.

Dated: 15/06/09.

We also attended a meeting with the applicant and their agents on Thursday 5 September 2019 to discuss issues we raised with the proposals. Where it is relevant we will make reference to this meeting in our response.

Based on the information submitted to date, and discussions we've had with the applicant, subject to conditions, we withdraw our previous objection, dated 23 April 2019.

The submitted feasibility study looks at two options for de-culverting the Moselle Brook and concludes it is not feasible to de-culvert at this location. The reasons

given for this are land take requirements, interface issues with existing buildings and increased risk of flooding.

The conclusions of the feasibility study we find convincing are the land requirements because the proposed options would require significant works to land outside of the applicants control. We do not agree that de-culverting the river would increase flood risk, so do not accept that aspect of the feasibility assessment. Taking the river out of culvert will reduce the risk of flooding from blockages and failures of the existing culvert. Additionally, the study has not considered just taking the top off the culvert, or re-profiling just the bank on their side of the culvert, both of which would be easier options, and would forego the need to take any land from the opposite bank. We believe the feasibility study could look at more options which may be more viable given the specific site constraints but respect that this is a decision for you, the Local Planning Authority to make in line with Policy DM28 of the Haringey Development Management Development Plan Document (DPD).

The submitted culvert inspections document provides some information on the condition of the culvert at this location. However the report is from 2009 and does not provide an accurate representation of the condition of the culvert today. We understand the applicant has requested additional information on the condition of the culvert from our enquiries team but unfortunately we don't hold any data for the Moselle Brook at this location. Additional information will be required on the condition of the culvert prior to development to ensure it is in satisfactory condition which is commensurate with the lifetime of the development. We feel it would be an unreasonable burden to ask the applicant to carry out a condition survey at this stage and accept it could be sought by way of planning conditions.

We therefore believe the proposed development will be acceptable if the following three planning conditions are included on the planning permissions decision notice. Without these conditions we would object to the proposal due to its adverse impact on the culverted Moselle Brook, designated a main river.

	<p>Condition 1- Culvert Condition Survey (pre-development)</p> <p>No development approved by this planning permission shall commence until a strategy for maintaining and improving the culvert has been submitted to, and approved in writing by, the Local Planning Authority. This strategy will include the following components:</p> <ol style="list-style-type: none"> 1. A condition survey of the existing culvert. 2. A scheme, based on the condition survey in (1), to undertake any required improvements or repairs to the culvert prior to the construction works. The scheme shall include a plan for any required long term monitoring and maintenance and a program for the improvements or repairs completion. <p>The scheme shall be fully implemented and subsequently maintained, in accordance with the scheme"s timing/phasing arrangements, or within any other period as may subsequently be agreed, in writing, by the Local Planning Authority.</p> <p>Reasons</p> <p>To prevent flooding on site and elsewhere by ensuring that the Moselle Brook culvert is in satisfactory condition which is commensurate with the lifetime of the development.</p> <p>This condition is in line with the following national and local policies:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Paragraph 163 of the NPPF "When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere". <p>aringey Development Management Development Plan Document (DPD) „Where appropriate the Council will require proposals to include a condition survey of existing watercourse infrastructure to demonstrate that it will adequately function for the lifetime of the development, and if necessary, make provision for repairs or improvements."</p> <p>Condition 2 - Culvert Condition Survey (post-development)</p>	
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Within three months of completion of the permitted development and prior to any part of the permitted development being occupied (whichever comes first) an updated condition survey of the culvert, to identify any adverse impacts resulting from the construction works, shall be undertaken, submitted to, and approved in writing by the local planning authority. Any damage that may have arisen during construction is to be remediated by the applicant within an agreed timeframe at no cost to the Environment Agency.

Reasons

To ensure the structural integrity of the culvert is not compromised and to prevent flooding on site and elsewhere. This condition is in line with the following national and local policies:

- Paragraph 163 of the NPPF „When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere“.
- Policy DM28 of the Haringey Development Management Development Plan Document (DPD) „Where appropriate the Council will require proposals to include a condition survey of existing watercourse infrastructure to demonstrate that it will adequately function for the lifetime of the development, and if necessary, make provision for repairs or improvements.“

Condition 3 – Piling Method Statement

No work on site shall take place until a detailed method and design for the piling works, or any other foundation designs within 8 metres of the Moselle Brook, has been submitted to, and approved in writing by, the Local Planning Authority.

Reasons

To ensure the structural integrity of the culvert is not compromised and to prevent flood risk on site and elsewhere. This condition is in line with the following national and local policies:

- Paragraph 163 of the NPPF „When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere”.
- Policy DM28 of the Haringey Development Management Development Plan Document (DPD) „Where appropriate the Council will require proposals to include a condition survey of existing watercourse infrastructure to demonstrate that it will adequately function for the lifetime of the development, and if necessary, make provision for repairs or improvements.”

Informative – Flood Risk Activity Permit

The Environmental Permitting (England and Wales) Regulations 2016 require a permit to be obtained for any activities which will take place:

- on or within 8 metres of a main river (16 metres if tidal)
- on or within 8 metres of a flood defence structure or culvert (16 metres if tidal)
- on or within 16 metres of a sea defence
- involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert
- in a floodplain more than 8 metres from the river bank, culvert or flood defence structure (16 metres if it's a tidal main river) and you don't already have planning permission.

For further guidance please visit <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits> or contact our National Customer Contact Centre on 03702 422 549. The applicant should not assume that a permit will automatically be forthcoming once planning permission has been granted, and we advise them to consult with us at the earliest opportunity.

Final Comments

	If you have any queries please don't hesitate to contact me on the details below.	
Thames Water	<p>Waste Comments</p> <p>With regard to surface water drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water we would have no objection. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. Should you require further information please refer to our website. https://developers.thameswater.co.uk/Developing-a-large-site/Apply-and-pay-for-services/Wastewaterservices</p> <p>„We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, testing and site remediation. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. Should the Local Planning Authority be minded to approve the planning application, Thames Water would like the following informative attached to the planning permission:“A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer.</p> <p>Permit enquiries should be directed to Thames Water’s Risk Management Team by telephoning 02035779483 or by emailing wwriskmanagement@thameswater.co.uk. Application forms should be completed on line via www.thameswater.co.uk/wastewaterquality.”</p> <p>There are public sewers crossing or close to your development. If you're planning significant work near our sewers, it's important that you minimize the risk of</p>	Observations have been taken into account and conditions and informatives included as appropriate.

damage. We'll need to check that your development doesn't limit repair or maintenance activities, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes>.

Thames Water would recommend that petrol / oil interceptors be fitted in all car parking/washing/repair facilities. Failure to enforce the effective use of petrol / oil interceptors could result in oil-polluted discharges entering local watercourses. The proposed development is located within 15m of a strategic sewer. Thames Water request that the following condition be added to any planning permission. No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement. Reason: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to impact on local underground sewerage utility infrastructure. Please read our guide „working near our assets“ to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-yourdevelopment/Working-near-or-diverting-our-pipes>.

Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB

Thames Water would advise that with regard to waste water network and waste

	<p>water process infrastructure capacity, we would not have any objection to the above planning application, based on the information provided</p> <p>Water Comments</p> <p>There are water mains crossing or close to your development. Thames Water do NOT permit the building over or construction within 3m of water mains. If you're planning significant works near our mains (within 3m) we'll need to check that your development doesn't reduce capacity, limit repair or maintenance activities during and after construction, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-nearor-diverting-our-pipes</p> <p>If you are planning on using mains water for construction purposes, it's important you let Thames Water know before you start using it, to avoid potential fines for improper usage. More information and how to apply can be found online at thameswater.co.uk/buildingwater.</p> <p>On the basis of information provided, Thames Water would advise that with regard to water network and water treatment infrastructure capacity, we would not have any objection to the above planning application. Thames Water recommends the following informative be attached to this planning permission.</p> <p>Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.</p>	
<p>London Fire Service</p>	<p>The London Fire Commissioner (the Commissioner) is the fire and rescue authority for London. The Commissioner is responsible for enforcing the Regulatory Reform (Fire Safety) Order 2005 (The Order) in London.</p> <p>The Commissioner has been consulted with regard to the above-mentioned</p>	<p>Comments noted.</p>

	<p>premises and makes the following observations: The Commissioner is satisfied with the proposals.</p> <p>Other comments: As per Approved Document B B5 for access and facilities for the fire service.</p> <p>Any queries regarding this letter should be addressed to the person named below. If you are dissatisfied in any way with the response given, please ask to speak to the Team Leader quoting our reference.</p>	
<p>Metropolitan Police</p>	<p>Dear Haringey Planning,</p> <p>Section 1 - Introduction: Thank you for allowing us to comment on the above planning proposal.</p> <p>With reference the above application we have now had an opportunity to examine the details submitted and would like to offer the following comments, observations and recommendations. These are based on relevant information to this site (Please see Appendices), including my knowledge and experience as a Designing Out Crime Officer and as a Police Officer.</p> <p>It is in our professional opinion that crime prevention and community safety are material considerations because of the mixed use, complex design, layout and the sensitive location of the development. To ensure the delivery of a safer development in line with L.B. Haringey DMM4 and DMM5 (See Appendix), we have highlighted some of the main comments we have in relation to Crime Prevention (Appendices 1).</p> <p>We have met favourably with the project Architects to discuss Crime Prevention and Secured by Design (SBD) for the overall site and advice has been incorporated into the initial stages of the design, with the Architect stating that SbD accreditation will be undertaken. At this point it can be difficult to design out any</p>	<p>Comments noted and condition included.</p>

issues identified. At best crime can only be mitigated against, as it does not fully reduce the opportunity of offences.

Whilst in principle we have no objections to the site, we have recommended the attaching of suitably worded conditions and an informative. This can be achieved by the below Secured by Design conditions being applied (Section 2). If the Conditions are applied, we request the completion of the relevant SBD application forms at the earliest opportunity. The project has the potential to achieve a Secured by Design Accreditation if advice given is adhered to.

Section 2 - Secured by Design Conditions and Informative:

In light of the information provided, we request the following Conditions and Informative:

Conditions:

(1) Prior to the first occupation of each building or part of a building or use, a 'Secured by Design' accreditation shall be obtained for such building or part of such building or use and thereafter all features are to be permanently retained.

(2) Accreditation must be achieved according to current and relevant Secured by Design guide lines at the time of above grade works of each building or phase of said development.

Informative:

The applicant must seek the continual advice of the Metropolitan Police Service Designing Out Crime Officers (DOCOs) throughout the development process to achieve accreditation. The services of MPS DOCOs are available free of charge and can be contacted via docomailbox.ne@met.police.uk or 0208 217 3813.

Section 3 - Conclusion:

We would ask that our department's interest in this planning application is noted

	<p>and that we are advised of the final Decision Notice, with attention drawn to any changes within the development and subsequent Condition that has been implemented with crime prevention, security and community safety in mind.</p> <p>Should the Planning Authority require clarification of any of the recommendations/comments given in the appendices please do not hesitate to contact us at the above office.</p>	
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<p>LOCAL REPRESENTATIONS:</p> <p><i>LETTERS FROM 20 INDIVIDUAL ADDRESSES</i></p> <p><i>18 IN OBJECTION</i></p> <p><i>1 IN SUPPORT</i></p> <p><i>1 COMMENTS</i></p>	<p>Land Use, Employment and Housing</p> <ul style="list-style-type: none"> • Lack of employment space • Lack of community facilities • Insufficient affordable housing provision 	<p>The site allocation designates this area for residential use and the existing buildings are in an unsuitable condition for new employment use.</p> <p>There are numerous existing community facilities in the local area.</p> <p>Affordable housing provision is above the maximum viability-tested level.</p>
	<p>Size, Scale and Design</p> <ul style="list-style-type: none"> • Excessive height and scale • Inappropriate detailed design • Overdevelopment of the site • Out of keeping with local character • Loss of openness 	<p>The maximum height is only a storey about neighbouring houses.</p> <p>Detailing is of a high quality using durable materials.</p> <p>The development density is only slightly above the indicative site capacity of the site allocation.</p> <p>The brick finish accords with existing houses surrounding the site, and the height and scale is not excessive.</p> <p>The site is not a designated open space,</p>

		and the height and scale of the development is not excessive.
	<p>Parking, Transport and Highways</p> <ul style="list-style-type: none"> • Main vehicle access is in an inappropriate location • Pedestrian crossing must be fully assessed • Parking spaces are poorly located • Difficult access to and from residential garages • Insufficient parking provision • Increased road congestion • Lack of detail over site entrance access controls • Loss of local road safety • No consideration of electric vehicle installations 	<p>An existing vehicle access would be used.</p> <p>An existing pedestrian crossing would be used.</p> <p>Most parking spaces have a traditional layout. Others are located so as not to obstruct the new route.</p> <p>Access to garages is sufficiently clear.</p> <p>Parking provision meets expected demand.</p> <p>Car use in and around the site is not expected to increase significantly.</p> <p>Details of access controls can be secured by condition.</p> <p>Vehicle movement numbers locally are not expected to be substantial. In time this employment zone is likely to become entirely residential.</p> <p>All spaces will have electric vehicle</p>

		charging points.
	<p>Residential Amenity</p> <ul style="list-style-type: none"> • Excessive overshadowing • Increased overlooking • Increased air pollution • Loss of day/sunlight • Increased noise • Increased sense of enclosure • Existing building contains asbestos 	<p>The daylight report shows that overshadowing of adjacent properties would be minimal.</p> <p>Overlooking across residential gardens is common in this area, and overlooking to the north would be minimised through obscure glazing to be secured by condition.</p> <p>Air pollution from the development is noted to be insignificant.</p> <p>Impacts on daylight and sunlight would be within acceptable limits.</p> <p>Noise from a residential development is not expected to be significant.</p> <p>There will be larger buildings than currently exist, but the height is only a storey above existing houses. An element of enclosure is not unusual for residential properties.</p> <p>Asbestos must be securely removed before works commence. This is covered by non-planning legislation.</p>

	<ul style="list-style-type: none"> • Disturbance from construction works • Increased anti-social behaviour 	<p>An element of disturbance is expected during construction. Works will be controlled by condition to minimise this.</p> <p>The development has been reviewed by the Met Police to their satisfaction.</p>
	<p>Park, Environment and Public Health</p> <ul style="list-style-type: none"> • Loss of wildlife • Conflict with existing commercial operations 	<p>The existing site has no wildlife, and improvements will be secured by condition.</p> <p>Businesses on surrounding sites are not particularly noise-creating and should be able to co-exist with residential development as per rest of the existing neighbourhood.</p>

Appendix 2: Plans and Images

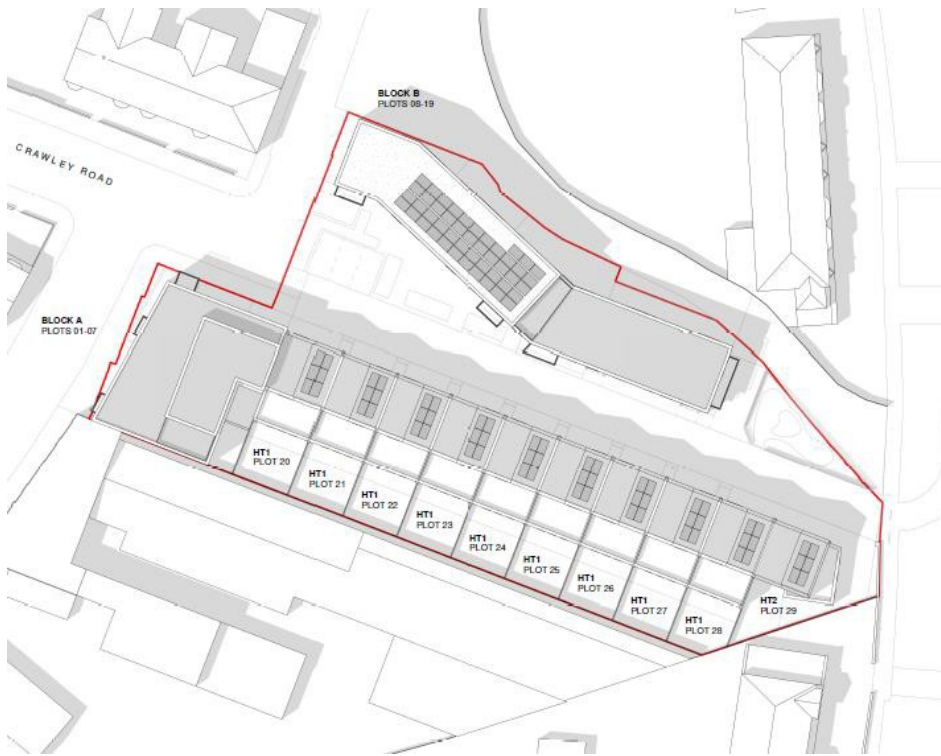
Existing Site Location Plan



Ground Floor Layout Plan



Roof Layout Plan



Site and Public Realm Landscaping



View from West on Crawley Road



View from East End of Site close to Downhills Way



Appendix 3: Quality Review Panel Reports

First Review – 26th September 2018

Summary

The Quality Review Panel welcomes the opportunity to review the indicative masterplan at a pre-application stage, and feels the broad principles of the development are well considered. The northern section of the masterplan is well resolved, but the panel thinks there is scope to improve the area to the south, especially with regard to the layout of buildings and spaces between them. In general, the panel would like to know more about the strategic approach to soft and hard landscape, and links to green spaces beyond the site. The design of the central linear space will be important to the success of the scheme. The panel encourages further work to explore the integration of vehicular movement and parking, and how ground floor accommodation can generate activity and natural surveillance, whilst also affording the dwellings" adequate privacy. The architectural expression of the scheme has a welcome simplicity, and the panel offered some detailed comments to support its continuing design development.

Massing and indicative masterplan

- The panel feels that the northern section of the indicative masterplan is well-resolved.
- In the planning application site (the central area of the masterplan), the simple layout and plot coverage seems to work well.
- The proposed density of the scheme seems appropriate for the site, and the panel feels that the massing has been handled well.
- There remains scope to improve the southern section of the masterplan, in terms of the layout of buildings, the nature of spaces between them, access and movement.
- The relationships between residential and employment uses, and between new and existing buildings would also benefit from more thought.
- The panel notes that anticipated adjacent sites within the indicative masterplan may not come forward for development, so the current proposals should make allowance for this.

Place-making, public realm and landscape design

- In terms of the proposed application site (centrally located within the indicative masterplan), the panel would encourage the design team to clarify whether the aim is for the central space to have the character of a „mews“ or a „green“ link.
- The panel would encourage the early involvement of an experienced landscape architect, to help resolve the character and use of streets and spaces.
- A vehicular through-route is not currently proposed, which creates an opportunity to explore alternative vehicle access arrangements. For example, parking areas

could be located centrally in which case the carriageway could occupy a smaller area of the site.

- This could allow for a different balance of hard and soft landscape, and different approaches to defining public and private space.
- It would like to see the space within the central mews tightened up slightly, to create more generous back gardens.
- The panel questions whether the part-undercroft car-ports are a successful way of integrating cars into the scheme. It would encourage the design team to explore other options to improve the relationship between the homes and external spaces.
- Consideration of an appropriate strategy for visitor parking would also be welcomed, in addition to how fly-parking would be managed.
- The design team should explore the feasibility of opening up a section of the Moselle river. Council officers could help to facilitate discussions with the Environment Agency in this regard.
- The panel would also like to see how the connection to the park might be able to work.

Scheme layout, and architectural expression

- The panel welcomes the simplicity of the architecture proposed. However, it questions whether the „bookend“ elements need to stand forward of the central wings of accommodation, and would encourage the design team to explore adjusting this aspect of the design.
- The panel would encourage further work to enhance privacy and defensibility of ground floor accommodation, particularly in prominent corner locations. In addition, consideration should be given to the quality of outlook and daylight to the rear of the mews houses.
- The panel notes that in current proposals, the ground floor elevations are lacking in articulation and activity; the view from the public realm is of undercroft parking areas and dead frontages, and this needs further consideration.
- It would encourage the design team to achieve a greater consistency across the scheme through simplifying the palette of brick types, and ensuring that the materials are high quality and detailed well.
- Where a dark palette of materials is currently shown at ground level, the panel thinks lighter tones could help to enliven the streetscene.
- The outlook of the top floor flats in Blocks A and B would benefit from further consideration as they overlook large expanses of flat roof.

Sustainable design

- The panel would like to know more about the strategic approach to energy efficiency and environmental sustainability for the scheme as a whole.
- The roofscape holds potential as a location for PV panels; in addition, identifying parts of the development to have living roofs can help with environmental

sustainability. The panel would like to see these issues considered as the scheme progresses.

- It would also like to know more information about how the development will support biodiversity.

Next steps

The panel would welcome a further opportunity to consider the proposals at a chair's review. It highlights a number of action points for consideration by the design team, in consultation with Haringey officers.

Second Review – 18th March 2018

Summary

The Quality Review Panel feels that the scheme is significantly improved since the previous review on 26 September 2018. The planning of the scheme seems very well ordered, and the nature and clarity of the central space is welcomed. Scope for improvement remains within the layout and configuration of the eastern section and „knuckle“ of Block B in order to improve the entrance, circulation arrangements and cycle storage for the flats, in addition to minimising the amount of blank frontage at ground floor. Exploring a different typology of units in this location may be helpful. The western end of Block A would also benefit from additional work to improve the generosity of the amenity space to the rear. Further details of the panel's views are provided below.

Place-making, public realm and landscape design

- At the previous review, the panel requested clarification of the nature of the central space. It feels that within the current scheme this central space now appears as well considered residential public realm and works much better. It will also provide a very useful pedestrian connection to Downhills Park from neighbouring streets.
- The panel welcomes the appointment of a landscape architect, and supports the emerging design principles for the hard and soft landscape. It also welcomes the introduction of trees in addition to planted areas adjacent to the front of the townhouses in Block A. These planting areas can support climbing plants (such as Virginia creeper) which can help to soften the whole scheme, and will help to establish a defensible zone near the entrance to each house.
- The panel notes that reducing the dimension of the mews space can sometimes help with the control of fly-parking; if it is narrow enough, parking on the shared space will not be possible.
- Careful consideration is also required of the detailed design of the external space in order to minimise clutter within the mews. Street lighting can be successfully located on the walls of buildings if considered at an early stage.

- The panel acknowledges the difficulties encountered within the aspiration to open up a section of the culverted Moselle River, including questions over land ownership.
- It considers that, within a comprehensive masterplan approach to the site and its surroundings, the area of land with the culverted stream poses a number of issues, and should be considered strategically in terms of how this narrow strip of land interfaces with the northernmost block (Block B) of the proposed development. It understands that Council officers intend to discuss this issue further with the Environment Agency.

Scheme layout and architectural expression

- The panel considers that the overall layout and architectural expression of the proposals are generally much improved since the previous review.
- Visually, the scheme now appears more elegant and well considered. The panel supports the shift from undercroft parking to garages – but notes that a greater generosity may be required within the design of the garages to enable them to function well. The open space to the rear of the houses also seems to have improved as a result of adjustments to the layout.
- Scope for improvement remains in the layout of the angled block (Block B), especially in terms of the „knuckle“, and the easternmost part of the block. The ground floor of this part of the site is visually sterile, with refuse and cycle stores occupying a prominent location, alongside garage doors and narrow entrances to the flats above.
- The eastern section of Block B (from the knuckle onwards) would benefit from a rethink of the layout in order to minimise the blank walls fronting onto the central space in this area, and to create an attractive and generous entrance to the flats within the block.
- In this regard, the panel would encourage the design team to explore providing a generous „wet lobby“ entrance for the flats, which would have space for deliveries and letterboxes, in addition to providing direct access to the cycle store.
- It also considers that situating flats on top of garages at the east of Block B creates a number of problems, including a visually bleak ground floor and a long access corridor to the flats at the first floor.
- The panel would encourage the design team to rethink this section of accommodation; situating townhouses at the eastern end of Block B may reduce some of these problems – the length of corridor to first floor flats could then be reduced, and the provision of dual aspect flats could potentially be increased.
- The western end of Block A at Crawley Road would also benefit from further work to increase the generosity of the amenity space provided. This L-shaped element results in severely constrained rear external space to the end units. The panel would support adjustments to the building lines and layout of these units to improve the quality of amenity space.
- The panel welcomes the simplicity of the architecture proposed, and feels that the lighter tones work well. While the previous proposals lacked visual coherence, the current scheme utilises only a single brick colour. Further thought

about the tones of brickwork specified could help to strike a balance between simplicity and coherence and a degree of variety to enliven the façade.

- The panel stresses that high quality brickwork and careful detailing are necessary to ensure a high quality development.

Next Steps

The panel is confident that the project team will be able to address the points above successfully, in consultation with Haringey officers.

Appendix 4: Development Management Forum (26th November 2018) – Briefing Note

Attendees

Seventeen members of the public were present.

Overview

The Forum was advertised to residents by Haringey Council via A4 notices posted by the site and in the local area. The Forum was held at Belmont Junior School.

The Forum was led by the Majors Team Leader for this area.

Generally, the discussion was robust and attendees had the chance to raise any concerns or questions and have them answered by officers, the applicant, their architects or other representatives.

Issues

Issues raised broadly covered the following areas:

- Detailed design – whether properties are in keeping with their surroundings
- Height – in terms of specific no. of metres, and comparison to existing buildings, and whether this could be reduced
- Density
- Layout
- Tenure – will units be for sale or rent
- Landscaping – what type of planting and when would it be planted
- Masterplanning – what is likely to come forward on adjacent site allocation designations in the future
- Site ownership – ownership of adjacent sites and site accesses
- Employment uses – whether any retained on site, or likely to be retained on neighbouring sites
- Pedestrian link – whether this a fundamental aspect of the development proposal
- Vehicle access and highway safety – potential conflict between existing business and future cyclists and pedestrians
- Parking – lack of provision
- Construction works
- Impact on neighbouring properties – in terms of loss of privacy
- Public consultation – lack of advertisement

These matters will be responded to as appropriate in the case officer's committee report.

Housing, Regeneration & Planning
Planning Policy
London Borough of Haringey
6th Floor River Park House
225 High Road
Wood Green
N22 8HQ

By Email: ldf@haringey.gov.uk

10 February 2020

Dear Sir / Madam,

London Borough of Haringey: Consultation on the Haringey Community Infrastructure Levy (CIL) Draft Charging Schedule – Representations submitted by St William Homes LLP

St William Homes LLP ('St William') is pleased to provide representations in response to the above consultation.

Established in 2014, St William is a joint venture between the Berkeley Group and National Grid Property ('National Grid'). The partnership combines National Grid's extensive portfolio of surplus brownfield sites across London and the South East with the Berkeley Group's design expertise and proven track record of delivery to create high-quality residential and mixed use developments.

St William have an interest in the former National Grid Energy Transmission (NGET) site located between Eade and Vale Road, Manor House, N4.

St William understands that key regeneration schemes within the eastern part of the borough (namely around the Tottenham Hale and North Tottenham growth areas) have generated the need for a CIL review. The review seeks to increase the rate for residential development within the eastern zone of the borough (in some cases by eightfold) and also seeks to distinguish between different residential uses, including Build to Rent and Warehouse Living, in rate setting.

St William is keen to work positively with the Council throughout the charge setting, and subsequent implementation processes, to ensure that development in the Borough continues to be viable and deliverable. In this regard it will be crucial for the proposed CIL charges to strike the appropriate balance between the need for infrastructure and the viability of development as required by the CIL Guidance which states that:

"Charging authorities should set a rate which does not threaten the ability to develop viably the sites and scale of development identified in the relevant Plan (the Local Plan in England, Local Development Plan in Wales, and the London Plan in London)." (25-008-20140612)

Former Gasworks sites are unique in both use and character; they are challenging and abnormally expensive to redevelop and regenerate compared to delivery of development on other brownfield sites. In addition, they can also have ongoing operational requirements requiring physical infrastructure and easements which can considerably reduce the developable site area.

The further challenge for developers of surplus utilities sites is the extra ordinary costs that must be incurred to bring them forward for development; typically, these costs must also be incurred upfront which exacerbates the viability challenge.

In considering the viability of these sites and their risk profile Councils need to ensure that all development costs are taken into account in accordance with CIL Guidance:

“A charging authority should take development costs into account when setting its levy rate or rates, particularly those likely to be incurred on strategic sites or brownfield land. A realistic understanding of costs is essential to the proper assessment of viability in an area. (25-020-20140612)”

The Guidance also requires Councils to consider those sites (such as brownfield sites) where the impact of the levy is likely to be most significant when setting CIL rates.

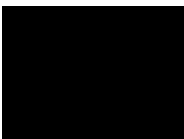
St William recognise that the viability of residential development across the Borough varies dependant on the proposed residential product and geographical location. As such, the Council's intended approach to set variable CIL rates to reflect this is supported; however, St William have concerns about the high rates increases currently proposed for the eastern zone which it is considered would render surplus utility sits unviable and prevent their regeneration.

The viability update study which provides evidence to underpin the draft charging schedule notes that some schemes would be unviable even if a zero CIL were adopted and therefore recommends that the Council 'pays limited regard to these schemes' as they are unlikely to come forward unless there are significant changes to main appraisal inputs, largely separate to the influence of CIL. The Study does not attempt to undertake any site-specific assessments, despite Government guidance that brownfield sites with significant viability challenges should be included.

The specific viability challenges to bring former utility sites forward needs to be considered as part of the CIL process and a balanced needs to be struck between securing enough revenue to invest in infrastructure on the one hand and the need to *minimise* the impact upon development viability on the other. On this basis, St William welcome further discussion with the Council.

St William trust that their comments will be duly considered as the Charging Schedule is progressed. Should you wish to discuss these comments or require any further information please do not hesitate to contact me.

Yours sincerely,



Lucy Bird
Planning Director – St James and St William.



Our ref: City Planning/05 Spatial Planning/03 London plan and planning obligations

Haringey Council
Planning Policy
River Park House
225 High Road
London N22 8HQ

Transport for London
City Planning

5 Endeavour Square
Westfield Avenue
Stratford
London E20 1JN

Phone 020 7222 5600
www.tfl.gov.uk

By Email

11 February 2020

Dear Sir/Madam

London Borough of Haringey Community Infrastructure Levy ~ Partial Review of Charging Schedule.

Please note that these comments represent the views of Transport for London (TfL) officers and are made entirely on a "without prejudice" basis. They should not be taken to represent an indication of any subsequent Mayoral decision in relation to this matter. The comments are made from TfL's role as a transport operator and highway authority in the area. These comments also do not necessarily represent the views of the Greater London Authority (GLA).

Thank you for the invitation to comment on the London Borough of Haringey Community Infrastructure Levy (CIL) draft charging schedule (DCS). I am responding on behalf of Transport for London (TfL) and the comments here are based upon the proposed charging schedule and the supporting documents, including the Eastern Haringey Viability Update Study Report (October 2019) and Infrastructure Delivery Plan Update Report (April 2016).

Public and active transport infrastructure is vital to support 'good growth' across London, and CIL will continue to play an important role in funding infrastructure to support new development. Generally, TfL supports and welcomes the approach you have set out and I only have the following minor observations to make.

The Mayor's adopted Charging Schedule (MCIL2) came into effect on 1 April 2019 and I am pleased to note that MCIL2 has been taken into account by BNP Paribas in their Viability Review Report, and subsequently, in the rates proposed in your draft charging schedule.

MAYOR OF LONDON



VAT number 756 2769 90

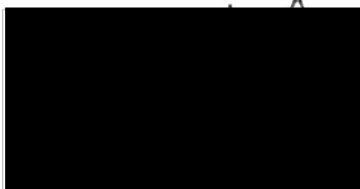
I have noted the significant funding gap that underpins the Haringey draft charging schedule. Whilst I am aware that the purpose of the funding gap is to meet one of the two key tests set out in the CIL regulations 2010 (as amended), the supporting infrastructure evidence (in terms of transport) was last updated in 2016. The IDP refers to the Mayor's Transport Strategy 2010 and several projects listed in the IDP have delivery dates that are in the past. The new Mayor's Transport Strategy 2018 sets out a bold new approach and ambitious new targets to create a more liveable city. The context therefore has changed significantly since 2016 and you should use this as an opportunity to review the IDP and update it to reflect current timeframes, budgets and priorities including an increased focus on sustainable transport modes in line with the Healthy Streets Approach.

I hope that you find these comments useful, and please contact me if you wish to discuss anything further. TfL officers welcome the opportunity to support policy development at the local level.

I would be grateful if you could note our request to be notified when you submit your charging schedule for examination, the publication of the recommendations of the examiner and approval of the charging schedule.

TfL looks forward to working closely with you in ensuring that necessary transport infrastructure is prioritised and delivered in the borough to aide both the delivery of the Mayor's Transport Strategy and enable new homes and jobs to support London's growth.

Yours sincerely,



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Haringey Council
Planning Policy
River Park House
225 High Road
London
N22 8HQ

11 February 2020
Reference CvO/0139b

Dear Sir/Madam,

WRITTEN REPRESENTATIONS TO LB HARINGEY CONSULTATION ON THE DRAFT CIL CHARGING SCHEDULE

I write on behalf of our client, CPG Feldman, to provide written representations following the publication of LB Haringey's Community Infrastructure Levy (CIL) Draft Charging Schedule for public consultation in the period to 11 February 2020.

Introduction

Our client is a landowner in LB Haringey and owns Omega Works, Hermitage Road. This site is an allocated site, located within the designated Warehouse Living district, in the 'Eastern' CIL charging zone. Our client is developing a mixed-use planning application for the redevelopment of their site which will contribute to the delivery of housing land supply to meet identified housing needs. Therefore, the rate at which CIL is charged is of great importance to our client.

LB Haringey commissioned BNP Paribas to undertake a review of the residential and student accommodation CIL rates in the Eastern CIL Zone of the adopted CIL Charging Schedule as well as to consider a rate for Warehouse Living. The latter use is a newer form of housing development that has been planned for in the borough and is consequently not currently covered by the adopted CIL Charging Schedule. The findings of the report are discussed below.

Policy Context

Paragraph 57 of the NPPF states that where up-to-date policies have set out the contributions expected from development, planning applications that comply with them should be assumed to be viable. It

National Planning Practice Guidance ¹ requires authorities to strike an appropriate balance

¹ NPPG - Paragraph: 010 Reference ID: 25-010-20190901

between additional investment to support development and the potential effect on the viability of developments when deciding the CIL rates. Charging authorities should be able to show and explain how their proposed levy rates will contribute towards the implementation of their relevant plan and support development across the plan area.

Proposed CIL Rates

Residential Rates

The current, adopted CIL Charging Schedule requires CIL to be paid on residential development in the east of the Borough at a rate of £15/sqm. The draft CIL Charging Schedule proposes to increase this rate to £50/sqm, representing an increase of 333.33%.

Our client objects to this considerable increase based on a number of errors within the evidence base.

Viability and Housing Delivery

Increasing the CIL rate chargeable on residential development schemes in the east of the Borough by 333.33% will have a significant impact on the viability of such schemes coming forward. The increased CIL rate will specifically have a considerable impact on the level of affordable housing that could viably be delivered across the Eastern CIL charging zone.

Recent planning decisions in LB Haringey make clear that the level of affordable housing delivered in major development schemes in the eastern charging zone is well below the LB Haringey policy compliant level of 40%. The low level of delivery can be attributed to high land values, high build costs, S106 contributions, and relatively low end values. Recent examples of major residential development schemes that have been approved without providing policy compliant levels of affordable housing include:

- Strategic Development Partnership (SDP) Sites, reference: HGY/2018/2223 for 1,036 units. Permission was granted with an affordable housing provision of 25%. The viability assessment concludes that a 25% provision is in excess of what the proposed scheme can viably support and is therefore beyond the 'maximum reasonable' amount as defined in the London Plan.
- 38 Crawley Road, reference: HGY/2019/0938 for 29 units. The agreed viability exercise demonstrated the maximum viable amount of affordable housing to be 19% by habitable room.
- 44-46 High Road, reference HGY/2018/1472. Allowed at appeal with 25% affordable housing provision.
- Berol Yard, reference: HGY/2017/2044 for 166 units. Granted with 8% affordable housing provision.
- Land rear of Plevna Crescent, reference: HGY/2017/2036 for 72 units. Granted with 20% affordable housing provision.

- Bernard Works, reference: HGY/2017/3584 for 99 units. Granted with 12% affordable housing provision.

Paragraph 3.14 of the Community Infrastructure Levy: Eastern Haringey Viability Update Study (CIL Study) confirms that, given the lack of a single threshold land value, it is difficult for policy makers to determine the minimum land value that sites should achieve. This will ultimately be a matter of judgment for each planning authority. Determining minimum land values introduces a certain amount of uncertainty that should also be reflected within the development appraisals.

The introduction of an increased CIL rate will further stifle the delivery of new housing in the Borough. The examples provided above demonstrate that residential schemes are already unable to viably deliver policy compliant levels of affordable housing with the CIL rate set of £15/sqm. The proposed rate of £50/sqm would further exacerbate issues with delivery of affordable housing. By increasing the CIL chargeable on residential developments, the Council will jeopardise the delivery of new housing and the opportunity to deliver affordable housing at levels compliant with policy requirements.

LB Haringey's Local Plan policy SP2 sets the target of providing 40% affordable housing on sites capable of delivering 10 or more units. With the delivery of affordable housing a core objective of both the Local Plan and National Planning Policy, the regeneration objectives of LB Haringey's Local Plan will be significantly compromised by the proposed increase.

Warehouse Living Rates

Newly introduced by the draft CIL Charging Schedule, it is proposed that CIL will be chargeable at a rate of £130/sqm for all new warehouse living schemes. Warehouse living is a very new typology that has been included in adopted policy.

The proposed CIL rate of £130/sqm is in a similar region to the proposed residential CIL charge of £165/sqm in the Central charging zone. This implies a comparison between residential and warehouse living which is wholly inappropriate considering the CIL rate for office space and all other uses is proposed to remain nil. By its very nature, warehouse living is defined by a mix of residential and commercial elements. It is classed by Haringey Development Management Policies DPD as a 'Sui Generis' use and therefore cannot be compared to residential when determining the CIL rates.

Viability Evidence

The Warehouse Living appraisal produced by BNP Paribas for the supporting evidence base document makes a number of assumptions when determining the viability of development schemes that are incorrect. Table 4.53.1 sets out the assumption that each room within a Warehouse Living development has a rental value of £700 per calendar month. The warehouse living appraisal result, however, assumes a rental value of £800 per calendar month. This clearly demonstrates discrepancies between the appraisals and their analyses.

Whilst similar typologies available to rent in the local area have broadly similar rental values to those used by BNP Paribas in their development appraisal, these rental values generally include all bills and council tax which account for a significant proportion of the monthly rent. Removing these costs from the monthly rent reduces the income earned by the freeholder. BNP Paribas has failed to take these reductions into account in the CIL Study, which therefore needs to be updated to reflect a lower overall rental level.

Build Costs

LB Haringey's Warehouse Living policy, DM 39, requires an appropriate standard of living for the integrated residential element and applications must have regard to the building specifications and amenity standards to be achieved for both the workshop space and the residential accommodation. This indicates that LB Haringey will expect the specification of the residential elements to be in line with prevailing residential standards.

The CIL Study acknowledges that there will be differences from site to site with respect to conversion costs and quality. However, the study does not make reference to new build costs and does not include any demolition costs. Warehouse Living is defined in the glossary of the Development Management DPD as *a specific type of land use that comprises purpose built and genuine integrated, communal working and living accommodation*.

Paragraphs 6.36 to 6.38 of the CIL Study make reference to the conversion costs of warehouse living schemes, set at £98.57 per square foot in the development appraisal. In only undertaking a development appraisal for a conversion scheme, BNP Paribas have failed to take into account that not all warehouse living schemes will be conversions. For new build schemes, build costs will be similar to those of residential developments (given the policy requirements for residential quality). At paragraph 4.22 of the CIL Study, build costs of £2055 per sqm (£191.23 per sqft) have been assumed for high density residential development. If this higher cost is inputted into the development appraisal, the build costs rise from £1,124,479 to £2,181,552. This rise in building costs would have a significant detrimental effect on the profit, making such schemes unviable.

Further analysis must be undertaken to determine the demolition and new build costs of purpose-built schemes, in line with the very definition of warehouse living as set out in the Development Management DPD. To omit these analyses from the study entirely is inappropriate and does not provide a representative nor sound analysis for warehouse living schemes.

Conclusions

It is essential that the introduction of the revised CIL charge will not prevent development coming forward.

The introduction of a CIL charge would affect the deliverability of new warehouse living

schemes promoted through policy DM39 and hamper the quality of such spaces in key regeneration areas in the borough. By further eroding the viability and potential for new warehouse living schemes coming forward, the important warehouse population will not be able to grow and is likely to be displaced by higher value uses such as residential.

Considering the significant element of commercial studio space, it should be considered more akin to commercial floorspace, carrying a charge per sqm of nil. We argue there should be a balance struck between the proposed CIL charge rate and the defined characteristics in between commercial and residential use.

Therefore, our client objects to the proposed raised in CIL charges for warehouse living and residential floorspace in the eastern district as this will act contrary to the objectives of the development plan in terms of viability and affordable housing targets. The methodology surrounding the warehouse living concept has also not been reflected accurately in the BNP Paribas CIL Study.

Yours faithfully,

Collective Planning