

New Warehouse Living
**Seven Sisters Road/
Eade Road**
Harringay Warehouse
District
London N15 6RD
Planning Statement

February 2023

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Executive Summary

The planning application proposals will see the delivery of the first new build, contemporary warehouse living buildings in the Harringay Warehouse District.

The proposals are advanced by Provewell Ltd, the Applicant and owner of two of the former industrial sites that comprise the Harringay Warehouse District (the District).

The preparation and submission of the proposals follow on from work undertaken by the Applicant's design team, which resulted in the production of a site wide Framework document (the Framework).

The Framework, which was produced in response to the requirements of Haringey development plan policy DM39 and site allocation SA34, establishes a set of key urban design, public realm, sustainability and operational principles for the Eade Road/ Overbury Road site.

These area wide principles have been designed to help shape, inform and coordinate future short to medium term proposals advanced in the District by the Applicant and others.

Both the Framework and the application proposals have been subject to extensive community and stakeholder engagement.

The application proposals fulfil the requirements of Site Allocations SA34 and SA35, follow the guidance set out in the Framework and will realise several benefits as follows:

- The delivery of new, high quality, contemporary warehouse living accommodation that will enable the District's creative community to remain and flourish in the area.
- The delivery of living and working accommodation that is affordable to existing and new warehouse residents.
- The creation of a new high quality 'gateway' into the District.
- The delivery of improved connectivity into and through the Site and the wider Warehouse District.
- The creation of a high-quality living and working environment for residents.

- The provision of new commercial and retail space that will activate and animate Eade Road, Seven Sisters Road and the existing alleyway. This new space will be made available to Warehouse residents and others at affordable rents.
- Provision of high-quality cycle parking, improved connections and wayfinding to public transport hubs and travel plans, which will help facilitate sustainable transport movements.
- Delivery of a range of measures to maximise its sustainability and minimise carbon emissions.
- Improvements to the quality and safety of an existing public pedestrian route between Seven Sisters and Tekesbury Road.
- Delivery of a variety of new private, public and communal open spaces and places that will be used by residents and visitors.
- Delivery of a significant biodiversity net gain, enhanced green infrastructure and new public and communal spaces.

This Planning Statement provides a detailed description of the scheme, the planning process and demonstrates that the scheme accords with Development Planning Policy and hence provides the necessary information to enable officers to recommend the proposals for approval.

1. Introduction

1.1 This planning application has been put together in support of a (Full) planning application to re-develop the largely vacant land located on the corner of Seven Sisters Road and Eade Road at one of the so-called key 'gateways' into an area known as the Harringay Warehouse District (the District).

1.2 The Application is being submitted by Provewell Ltd (the Applicant) who own and operate two of the five former industrial sites that comprise the District (Eade Road/ Overbury Road and the Arena Business Centre).

1.3 The Application seeks approval for a mixed development comprising new warehouse living (*sui generis*) and other mixed commercial floorspace (Class E). The description of development used on the application form is as follows:

'Construction of two new buildings to provide new warehouse living accommodation (Sui Generis (warehouse living)), ground floor café/ workspace (Use Class E) and associated waste collection and cycle parking. Erection of 10 stacked shipping containers (two storeys) to provide workspace/ artist studios (Use Class E), toilet facilities and associated waste collection and cycle parking. Landscape and public realm enhancements including the widening of and works to an existing alleyway that connects Seven Sisters and Tewkesbury Road, works to Tewkesbury Road, the creation of rain gardens, greening, seating, signage and artworks and all other associated infrastructure works, including the removal of an existing and the provision of a new substation to service the new development'.

1.4 The submission of the application represents the culmination of a long and in-depth pre-planning process involving the Applicant, existing Warehouse residents and Haringey Council (the Council). The proposals that have evolved from this process will enable the first purpose-built contemporary Warehouse Living development to be brought forward in the District.

1.5 The District and the warehouse living that it supports is something that has evolved organically over time. The area supports a wide range of former industrial buildings and warehouses that have gradually become inhabited by artists and creatives looking for affordable places to live and work. The buildings and the spaces between have been adapted in all sorts of ways to meet the specific needs of the

people living and working in the area. As a result, a unique living and working community has been created.

1.6 The buildings and warehouses that comprise the District were, however, originally designed as industrial/ storage spaces and whilst they have adapted well to the living and working needs of the warehouse community, several of the existing buildings have or will soon reach the end of their economic and design lives. Their original role and function also mean that they do not perform well as places to live. They are poorly insulated and expensive to heat in winter and they overheat in the summer. Access to natural light and outdoor amenity space is compromised and the ability of the area to support the day-to-day operational needs of the community in terms of waste/ recycling facilities, bike storage and providing a safe and secure public realm is challenging.

1.7 In short, the area requires investment and needs to evolve and adapt if it is to sustain itself as a robust place to live and work in the longer term.

1.8 The Applicant is committed to the area and to the existing community and has confirmed that they want to see warehouse living evolve and thrive and the area to remain a focus for London's creative community.

1.9 In pursuit of this decision, they appointed a multidisciplinary team to help design a new purpose-built warehouse living building: a building that captures both the essence and industrial character of existing warehouse living, meets all contemporary building, fire and environmental regulations and secures floorspace that is affordable to existing and new residents.

1.10 It would be fair to say delivering on this brief has been extremely challenging. There have been several false starts using a variety of different architects and alternative methods of and approaches to construction. The Applicant has, however, stuck with it and has invested time, money and expertise developing the initiative and as a result they believe they have finally delivered what they set out to do with the application proposals.

1.11 The buildings that comprise the Application both capture and articulate themselves as contemporary warehouse living buildings, whilst at the same time providing for the operational and quality of life needs of a living and working community.

1.12 It is acknowledged that the delivery of new build warehouse living could not have been achieved without the support of Haringey Council. Whilst initially resistant to the unauthorised occupation of protected industrial buildings, several officers and Members have taken the time to understand the District and have come to recognise the role it plays in terms of supporting a type of living and working that is affordable to young creative people.

1.13 In response, rather than using their planning and enforcement powers to clamp down on the use the Council has helped to formalise it by working with the Applicant to bring the existing buildings up to contemporary HMO standards; granting HMO licenses and established use certificates; putting in place the spatial planning policy framework to enable warehouse living to evolve and develop and helping to create the conditions whereby planning applications can be brought forward.

1.14 This Planning Statement explains this background and the pre-planning process that has been pursued with the Council's Planning team.

1.15 It also describes the component parts of the scheme, sets out why the proposals accord with the Development Plan and provides the necessary narrative as to why the proposals should be permitted without delay.

1.16 This planning statement should be read in conjunction with the plans and other supporting documents submitted as part of the application. In addition to this statement, the following documents have been submitted:

- Application Forms and Notices (prepared by Jen Ross Consulting)
- Cil Additional Information Form (prepared by Jen Ross Consulting)
- Site location plan (prepared by Morris & Co)
- Application drawings (prepared by Morris & Co and Campbell Cadey)
- Access and Inclusion Statement (prepared by Probyn Gibbs Associates)
- Air Quality Assessment (prepared by Air Quality Solutions)
- Archaeology Desk Based Assessment (prepared by RPS)

- Circular Economy Statement (prepared by Expedition Engineering)
- Ecology Survey and BNG calculation (prepared by RPS)
- Energy Statement (prepared by Expedition Engineering)
- Fire Safety Statement and Gateway 1 Form (BB7)
- Flood Risk Assessment (prepared by London Futures Lab)
- Ground Conditions (Phase 1 Desk Study) (prepared by A2 Site Investigation)
- Design and Access Statement (prepared by Morris and Co)
- Landscape DAS (prepared by Campbell Cadey)
- Management Plan (Draft) (prepared by Dakota)
- Noise Impact Assessment (prepared by KP Acoustics)
- Planning Statement (prepared by Jen Ross Consulting)
- Sunlight and Daylight Assessment (prepared by Waldrams)
- Surface Water and Drainage Strategy (prepared by London Futures Lab)
- Sustainability Statement (prepared by Expedition Engineering)
- THVIA (prepared by Neaves Urbanism & GJH)
- Transport Assessment, Travel Plan, DSP, OWMS (prepared by Velocity)
- Viability Statement (prepared by ULL Property)
- Wind Microclimate (prepared by FD Global Limited)

1.17 The Harringay Warehouse District Masterplan Framework Document ('the Framework'), which is discussed under Section 5 of this Statement is also submitted in support of the Application. The Framework, which has been prepared in consultation with existing warehouse residents and Council officers and in response to the requirements of DM39 of Haringey's Development Management DPD and relevant Site Allocations provides the area wide urban design and planning context for all planning applications and other works that will be brought forward in the area and the means by which the future transformation of this part of the District will be co-ordinated and managed.

1.18 The Framework has informed the scope and content of the Application proposals and where appropriate the various documents that are submitted in support of the Application refer to its content.

1.19 This planning statement is structured as follows:

- Section 2: Site and Surrounding
- Section 3: Planning History
- Section 4: Site Allocation
- Section 5: The 'Framework'
- Section 6: Pre-Application Engagement
- Section 7: The Development Proposal
- Section 8: Planning Policy Framework
- Section 9: Planning Policy Assessment
- Section 10: Planning Obligations
- Section 11: Summary and Conclusions

2. Site and Surroundings

2.1 A comprehensive description of the Site, its context and those spatial factors/ constraints and opportunities that have impacted on and influenced the proposals are outlined in the Design and Access Statement and Landscape DAS that accompany the Application and hence this section focuses on the key planning issues that have shaped the scope and content of the Application.

2.2 Most of the Site forms part of the wider Overbury Road/ Eade Road site, which is one of five former industrial sites that comprise the Harringay Warehouse District.

2.3 The wider Overbury Road and Eade Road site, in which most of the Site sits is located in the south of the borough, to the west of Seven Sisters Road and north of Eade Road. The wider site is approximately 600 metres from Manor House Underground Station and within proximity to Seven Sisters Road where several bus routes pass. The wider site has a PTAL of 5.

2.4 This wider site supports around 68 separate units and some 20,288sqm (GIA) of floorspace. The space comprises a mix of warehouse / industrial building types of varying age, size and heights from 2 to 5 storeys.

2.5 In terms of use: Unit 1 and Unit 2 Overbury Road, part of Unit E, part of Unit 4 and 195 Eade Road are in commercial use. All other units are in residential (Class C3)/ HMO (sui generis) use). The residential/HMO units support a total of 570 rooms of accommodation, in units of between 3 and 15 people.

2.6 The area also supports a small café/ convenience store on Overbury Road and a bar/café within the ground floor of Unit E, fronting onto Eade Road.

2.7 The wider Eade Road/Overbury Road site sits within a mixed area. Existing residential and employment uses lie to the north. Florentia Clothing village made up of predominantly low-rise light industrial buildings and office floorspace is located immediately to the west. The area to the south comprises Eade Road, an area of private open space owned by Thames Water, existing residential and the Woodberry Down re-development further to the south.

2.8 It is also located in an area that is experiencing significant change and redevelopment. Two recent major planning permissions that will have a significant influence on the future planning and development of both the District and the wider neighbourhood, are as follows:

■ **Application HGY/2022/0044**, involving the redevelopment of part of the Florentia Clothing Village, located immediately adjacent to western boundary of the wider site, and the delivery of four buildings to provide approximately 9,363sqm of flexible light industrial use and storage (Class E) and distribution (Class B8). It is understood that a wide range of unit sizes are to be provided that will cater for a variety of commercial occupiers from small to medium enterprises. It is envisaged that around 250 jobs will be delivered on site and space provided for around 54 businesses. This permission will influence the mix and balance of uses that will be delivered as part of the wider Site, together with the planning of the public realm and the creation of new links and spaces.

■ **Application HGY/2022/1833**, St Ann's General Hospital, St Anns Road, involving the comprehensive redevelopment of some 7.2ha of land situated to the north of the London Overground railway line and the wider site, to provide a new residential neighbourhood of circa 995 new homes and 2,400 sqm of non-residential uses and 167 car parking spaces. The proposed development masterplan includes new buildings of between three and nine storeys in height laid out around an extended Peace Garden in the centre of the site. This permission will impact upon the character and built form of the area, movement patterns and land use mix.

2.9 As part of both the process of developing the application proposals the team has ensured that both the wider Framework strategies and initiatives and the Application proposals both complement and work with the proposals being advanced by these two nearby developments.

2.10 The Application Site, itself is 0.23ha. It comprises largely of vacant land that wraps around the existing Cara House warehouse living building to the north and south; the existing alleyway that connects Seven Sisters to Tewkesbury Road; part of Tewkesbury Road; 341 & 343 Seven Sisters Road and the former car breakers yard located to the rear of these two terraced properties and an electricity sub-station, which is to be re-provided as part of the application proposals.

2.11 As will be appreciated the red line of the application site goes beyond the ownership of the Applicant and takes in land in the Council's ownership, which has been included to help facilitate the delivery of wider public realm and access improvements that have been identified as part of the site wide Framework document, prepared by the Applicant in consultation with officers (see section 5).

2.12 The Applicant has also recently acquired two x two storey terraced properties that front onto Seven Sisters Road and which lie adjacent to the eastern side of the alley: 341 & 343 Seven Sisters Road and the former breakers yard that lies to the rear of these properties and fronts onto Tewkesbury Road.

2.13 These two properties and the breakers yard sit outside of the existing Eade Road/ Overbury Road Warehouse District site but were acquired by the applicant in order to help facilitate the comprehensive delivery of the Application proposals and to enable the development to fully realise the aspirations expressed in the Framework document for this part of the District.

2.14 The two terrace buildings contain existing ground floor retail and residential above. These uses will be retained by the application proposals. The two buildings are, however, included in the Application proposals to enable the redevelopment of the former breakers yard to the rear of the properties and proposed public realm upgrades. It is envisaged that the proposed new commercial area will extend into the basement areas below these two buildings.

2.15 The Site has a challenging topography dropping from Eade Road (26.80m AOD) down towards Tewkesbury Road (19.30m AOD). The level change is currently traversed by an existing retaining wall and the alleyway, which runs between the flank wall 341 Seven Sisters Road and the vacant land to the east of Cara House and down to Tewkesbury Road. The existing alley is narrow and steep and is poorly overlooked. The Applicant has, however, recently introduced lighting to help improve safety and security.

2.16 In terms of neighbouring land uses/ buildings, Cara House itself, comprises a former office building, which has been converted into warehouse living. The building currently supports around 70 bedrooms and shared communal space. Existing industrial/ warehouse distribution buildings occupy land to the west, which are accessed from Eade Road.

2.17 Vivian House, an existing four-storey residential block sits opposite the Site to the south and Amhurst Court, another four-storey residential block sits to the south-east. To the south, the Old Button Factory fronts onto the western side of Tewkesbury Road and comprises warehouse living accommodation and a series of existing breakers yards/ car mechanic businesses occupy land fronting onto the eastern side of Tewkesbury Road.

Above ground heritage

2.18 There are no statutorily listed buildings within the Site, and the land is not within a Conservation Area.

2.19 There are two heritage assets in the area close to the Site, and a number in the wider area but the Site context overall is not sensitive in heritage terms.

2.20 The closest heritage asset, lying to the south on the opposite side of Eade Road is the northern off-shoot of the Stoke Newington Reservoirs, Filter Beds and New River Conservation Area. The main body of this CA, however, lies further to the south beyond the A503 and Newton Close.

2.21 The St Anne's CA lies some 580m to the north of the Site and includes 4 statutory listed buildings and 5 locally listed buildings. South Tottenham High Road CA lies some 800m to the east and includes one grade II listed building and a locally listed building.

2.22 The grade II listed Woodberry Down Community JMI School lies some 240m to the east in the LB Hackney and there are several locally listed buildings that lie outside conservation areas within the 500m from the Site, including the former Maynard's Sweet Factory on Vale Road, some 160m to the west, and 3 on the south-east side of Seven Sister Road. Finally, some 780m to the west, is the Finsbury Park grade II Register Park and Garden of Special Historic Interest ('RPGSHI').

2.23 The locally listed no. 100 Amhurst Road lies on Amhurst Road on the opposite side of Seven Sisters Road.

2.24 In addition, the Site is not affected by any of the 'Designated Views' or 'Protected Vistas' outlined in the London View Management Framework of the New London Plan. The Site does, however, fall in the backdrop of Panoramic View 1 from Alexandra Palace, as set out in Appendix A and Figure 2.1 of LB Haringey's Development Management Development Plan Document.

Below ground heritage

2.25 In terms of relevant nationally significant designated heritage assets, no World Heritage sites, Scheduled Monuments, Historic Battlefield or Historic Wreck sites are identified within the Site or its immediate vicinity.

2.26 The Site does not lie within an Archaeological Priority Area, as defined by the London Borough of Haringey and their archaeological advisors at the Greater London Archaeological Advisory Service (GLAAS).

2.27 The Archaeological Desk Based Assessment that is submitted in support of the Application concludes that the Site is likely to have a generally low archaeological potential for all past periods of human activity.

Flood risk

2.28 The Environment Agency's (EA) 'Flood Map for Planning' shows that site is located within Flood Zone 1, meaning there is a low probability of fluvial flooding.

Air quality

2.29 The site is located within an Air Quality Management Area (AQMA) which has been declared due to exceedances of the annual mean Air Quality Objective (AQO) for nitrogen dioxide (NO₂), which in turn will give rise to issues for the design of the development.

Access

2.30 In terms of access the main access to the Site for vehicles and pedestrians is from Eade Road to the south with further accesses from Seven Sisters Road and Tewkesbury Road.

2.31 The site is within a 10-minute walk of Stamford Hill Station and a 15-minute walk of Manor House, Seven Sisters, South Tottenham, Stoke Newington and Haringay Green Lanes Stations.

2.32 A range of amenities are also located within a 30-minute walk of the site including supermarkets, pharmacies and green spaces.

3. Planning History

3.1 The wider site has been subject to an extensive planning history. Most of the recent historic applications relate to Certificates of Lawfulness applications in relation to establishing the use of the existing industrial/ warehouse buildings for residential (Class C3) use.

3.2 In relation to understanding the planning origins of warehouse living, the emergence of specific warehouse living planning policy and the site- specific site allocations associated with the Site it is relevant- in the context of this planning application- to refer to an appeal decision for a site at Eade Road: Unit 4 and Unit C, 199 Eade Road (Appeal refs APP/Y5420/C/14/2212163 and APP/Y5420/C/14/2212166, dated 25th September 2014).

3.3 The appeals were concerned with the unauthorised change of use of commercial units to residential use, the effect of the development on the supply of employment land and the living conditions, in terms of access to sunlight and daylight, ventilation and external amenity space.

3.4 In the context of understanding the proposed warehouse living use the Inspector's observations as to how the existing buildings were being used is particularly relevant:

'....It has to be said that, whilst the units appeal primarily to people who need flexible work space, not all of the residents now, or at the time the notices were issued, work or worked in the units. Some have full time jobs elsewhere or are students. The indications are that these people simply enjoy the creative, communal environment, as well as the relatively low rents. Some work in fields such as events management and one is an electrician, but they benefit and indeed feed off the activities of the other residents. Others are endeavouring to get creative businesses off the ground, whilst working in other fields, or are just trying to make the transition from full time study. Indeed, I heard of at least one occupant of Unit C becoming a full time performer since moving into the unit.

It must also be said that the employment activity is subject to constant change. This was stressed by Mr Gardiner, who said that many of the activities and projects are of a temporary nature and the amount of space taken up will vary from time to time. The communal space may be full of music/studio equipment for rehearsals or recording one day, which is packed away the next. Someone may be working on a sculpture, which could then appear to be serving as decoration of the living space. This state of flux, in which activities crystallise and dissolve, only to be replaced by others, is inevitable, given that the communal space is subject to competing demands.

My inspection of the inside of the units took place well after 5:00 pm. Whilst I saw, musical instruments and equipment; art works in progress; sewing machines; part completed garments and jewellery, it was difficult to gain an impression of the scale of work activities undertaken'

3.5 Based on the evidence the Inspector concluded that in his view the use of both units went well beyond pure residential use and involved an element of work. He felt that the style of living and working adopted by the warehouse community does not fit easily into any conventionally recognised land use category. He described the use as communal live/ work accommodation and confirmed that this definition recognised the mix of uses and the fact that the buildings do not comprise self – contained units, with functionally and physically separate living and working elements.

3.6 The decision of the Inspector and his commentary subsequently helped to shape and inform local planning policy in relation to warehouse living (see Section 4).

3.7 In terms of the application site itself, a review of the planning register confirms the following in terms of the land and buildings that comprise the application site:

Application ref.	Address	Description	Decision
OLD/1971/1055	343 Seven Sisters Road	Erection of 5 storey building to provide works offices stores and 4 x4 and 4 x3 room flats	Refused (01/6/1971)
OLD/1974/1384	341-343 Seven Sisters Road	Erection of 2 storey light industrial building	Approved (04/11/1974)
OLD/1977/1163	341-343 Seven Sisters Road	Partial reconstruction of existing builders workshop/ stores at rear	Approved (12/9/1977)
OLD/1978/1249	341-343 Seven Sisters Road	Use of one room as a nursing agency	Approved (21/6/1978)
OLD/1978/1248	343 Seven Sisters Road	Use as a sandwich bar-kebab take away	Approved (04/1/1978)
OLD/1979/1218	341 Seven Sisters Road	Continuation of use for manufacture of dresses on 1st floor	Refused (06/2/1979)
OLD/1974/1383	341-343 Seven Sisters Road	Erection of 2 storey light industrial building	Refused (17/6/1974)
OLD/1981/1385	341-343 Seven Sisters Road	Continuation of use of first and second floor as garment manufacturing.	Approved (31/3/1981)
OLD/ 1989/1740	341-343 Seven Sisters Road	Demolition of existing structure and erection of a single storey building for light industrial purposes	Approved (05/9/1989)
HGY/2015/3045	341 Seven Sisters	Display of 1 x illuminated LED screen sign	Refused (10/12/2015)
HGY/2015/0055	341a Seven Sisters Road	Certificate of Lawfulness for use of property as five self contained residential dwelling units.	Approved (11/2/2013)
HGGY/2003/0383	341a Seven Sisters Road	Erection of additional floor to existing building	Approved (14/5/2003)
HGY/2002/0105	2-4 Tewkesbury Road R/O 341-343 Seven Sisters Road	Erection of a single storey storage building in existing yard	Approved (18/4/2002)
HGY /1996/0920	341 Seven Sisters Road	Conversion into two self- contained flats (1 x 2 & 1 x1 bed)	Approved (22/10/1996)
HGY/2020/3110	Cara House, 339 Seven Sisters Road	Erection of temporary structures and adjustments to the existing boundary treatment for use as a temporary events structure occupying the site under meanwhile use, hosting a programme of community workshops and events	Approved (19/2/2021)

4. Site designations

4.1 The site is identified by Haringey's Site Allocation DPD (SADPD) as falling within two specific site allocations:

- **SA34: Overbury and Eade Road.** This is one of five sites in the Haringay Warehouse District that are covered by specific site allocations, the others being:
 - SA 30: Arena Design Centre
 - SA 31: Crusader Industrial Estate
 - SA 32: Omega Works
 - SA 33: Vale/ Eade Rds

The SADPD highlight the issues and opportunities facing the District as a whole and based on this analysis goes on to set out a vision for the future of the area:

'.....creation of a collection of thriving creative quarters, providing jobs for the local economy, cultural output that can be enjoyed by local residents, and places for local artists to live and work'.

In relation to **SA34: Overbury & Eade Roads** the proposed allocation advocates for development that will increase accessibility and the provision of mixed use floorspace, including warehouse living accommodation.

The allocation notes that area has several units which have fallen into use as warehouse living and that some of these units provide poor standards of accommodation and have compromised/limited amenities which fall short of living standards for residents envisaged by the Plan.

The allocation calls for: *'.... a comprehensive approach to site management and managed enhancement of the employment and residential offer, including improved permeability.'*

The allocation confirms that the Council will work with landowners and residents: *'.....to find ways to reintroduce employment into these areas, while continuing to meet the accommodation needs of the existing creative community.'*

The allocation sets out a series of requirements/ opportunities, as follows:

- **A site-wide management plan masterplan** will be required as part of any planning application in accordance with Policy DM39 and having regard to site circumstances.

- The **potential for a building on the corner of Eade and Seven Sisters Rds marking the gateway** to the warehouse district from Seven Sisters Rd.
- **Reintroducing employment- generating uses.** These may be created at ground floor level as part of a mixed-use development, or in purpose-built blocks.
- A **fine-graining of the street network** encouraging pedestrian permeability.
- **Affordable commercial rents** will be expected to be retained in perpetuity in this area in line with Policies DM38 and DM39.

The allocation is also supported by a series of Development Guidelines, which encourage development to **create active frontages** to ensure passive surveillance; the creation of a **limited destination**, as part of a central space i.e. a 'Makers Market'; the opening up of the south bank of New River; buildings designed to **maintain the unique warehouse character** and developments that continue to **support the principles of communal living**.

- **SA35 L/b Seven Sisters and Tewkesbury Rds.** The two terraced properties at 341 & 343 Seven Sisters Road and the now vacant breakers yard to the rear form part of the SA35 site allocation.

The proposed site allocation encourages the redevelopment of existing buildings to: *'....create a higher quality streetscape on Tewkesbury Road, and complement the Haringay Warehouse neighbourhood'.*

In terms of the specific requirements that are relevant to the application the allocation confirms that the terrace fronting Seven Sisters should be retained and the uses on the site should be commercial at ground/ 1st floor and residential above.

The Allocation also includes a series of development guidelines which are relevant to the application proposals including the provision of an improved connection between the District and Seven Sisters/ Amhurst Roads and that buildings should present active frontages onto Seven Sisters Rd, but servicing should be accessed from Overbury and Tewkesbury Rds.

4.2 The SA34 Site Allocation is also included within a **Regeneration Area** and as such employment-led mixed-use development is considered suitable. It is also designated as a **Local Employment Area (DEA24)**.

4.3 The LEA/ RA designations are supported by policy DM39 of Haringey's Development Management DPD. In pursuit of the specific characteristics of the Warehouse District, these policies aim to increase the number of jobs, and preserve the creative community present in the area.

4.4 It confirms that the Council will:

'...support proposals for warehouse living that form part of an agreed masterplan to increase and diversify the employment offer of these employment areas whilst providing an appropriate standard of living for the integrated residential element'.

4.5 The policy requires the preparation of masterplans for the future development of these areas, which have regard to individual site circumstances and the following matters:

- a. The **access arrangements, physical condition and layout of the existing buildings** and accommodation on the site;
- b. The **lawful planning uses on site**, establishing the existing baseline with respect to the intensification of the employment offer and re- provision of the host community;
- c. The host community's existing and **future accommodation needs for creative living and working**;
- d. The **quantum of commercial floorspace to be retained, re-provided, increased**, and the resulting increase in employment density to be achieved having regard to the baseline at (b);
- e. The **size and type of both the workplace space and residential accommodation to be provided**, having regard to:
 - i. the needs of SMEs for smaller unit sizes (<100m²);
 - ii. provision for communal workspace, both internal and external;
 - iii. the need for low-cost workspace and affordable residential accommodation to support and grow the existing start up and creative industry sectors.

- f. The interface with, and potential **impact on, neighbouring uses**;
- g. The internal layout of uses and therein, the potential to optimise the positive inter- relationships and **avoid, where practicable, negative impacts**;
- h. Having regard to (e – g) above, the **building specifications and amenity standards** to be achieved for both the workshop space and the residential accommodation;
- i. The **specific site requirements** as identified in the individual site allocations;
- j. Controls over the **management and operation of the warehouse living spaces**, in particular, the means by which to ensure that the use of the site continues to promote the genuine inter- relationship of the living and working elements;
- k. **Servicing and parking requirements**; and
- l. **Viability**, including requirements for cross- subsidy from other uses including private residential development (market sale/PRS etc).

4.6 In the context of these policy requirements the Applicant developed the required site-wide masterplan framework. The process, scope and content of the resulting masterplan is considered in the next section.

■ 5. The Harringay Warehouse District Masterplan Framework Document (the ‘Framework’)

5.1 Both the SADP (All Warehouse District Allocations) and Warehouse Living policy DM39 confirm that the Council will work with local landowners and residents to produce masterplans to help guide development in the District.

5.2 SA34 confirms that a site-wide management plan masterplan will be required as part of any planning application and that this ‘masterplan’ should accord with Policy DM39 and have regard to site circumstances.

5.3 In pursuit of this policy framework the Applicant and their design team has developed a masterplanning framework for the wider Overbury/ Eade Road site (the wider site) in consultation with existing residents and Council Officers.

5.4 The document: Harringay Warehouse District (Overbury/ Eade Road) Masterplan provides area specific planning and urban design guidance for the wider site.

5.5 In line with Warehouse Living Policy DM39 and Site Allocation 34: Overbury & Eade Roads, the Framework:

- Draws out and defines those factors or ‘key ingredients’ of Warehouse living and working.
- Confirms the baseline position on the site in terms of landownership, floorspace, unit numbers, lawful planning use, land use and occupancy.
- Describes the key spatial characteristic of warehouse living, how the spaces (internal and external) are used by residents, the people who live and work there and what they say about living/working in the District – what works well/ what does not work so well and what improvements they would like to see.
- Establishes a set of minimum technical design, amenity, energy and sustainability standards/ requirements to be achieved by any new build/ refurbishment proposals brought forward.
- Provides the necessary baseline technical information to help inform future development in terms of ground conditions, archaeology, flood risk and drainage and ecology and biodiversity.
- Provides a site wide urban design, public realm, movement and landscape framework.
- Provides specific guidelines in relation to topics such as car and cycle parking; refuse, signage and lighting.
- Provides area/ site specific guidelines for three defined character areas that comprise the site, namely Eade Road; the ‘heart of the site and Overbury / Tewkesbury Road.
- Identifies a series of works and site-specific building projects to be pursued by the Applicant in the short to medium terms, which includes the redevelopment of the Seven Sisters/ Eade Road site- the subject of this planning application.
- Provides the heads of terms for the future management and operation of the District.

5.6 In the context of the specific requirements of policy DM39 we would confirm the following in relation to the scope and content of the Framework:

DM39 requirement	Framework response
a. The access arrangements, physical condition and layout of the existing buildings and accommodation on the site;	The Framework provides a detailed description of existing access arrangements, physical conditions, layout and in so doing confirms the existing problems, issues and opportunities on the site, which together have helped inform the component parts of the Framework proposals.
b. The lawful planning uses on site, establishing the existing baseline with respect to the intensification of the employment offer and re- provision of the host community;	The Framework confirms the baseline position in terms of number of units, quantum of development and land use mix (quantum of floorspace in lawful residential use, lawful commercial use and warehouse living/ residential).
c. The host community's existing and future accommodation needs for creative living and working;	The Framework and the Application proposals have been the subject of extensive consultation with residents and based on this consultation the Framework defines a set of key principles for future warehouse living, which have helped shape the content of the Application proposals.
d. The quantum of commercial floorspace to be retained, re-provided, increased, and the resulting increase in employment density to be achieved having regard to the baseline at (b);	The Framework proposes to retain all existing floorpace that is in full commercial use. The Framework also proposes to increase the amount of commercial floorspace and as part of the early works Block D has been fully refurbished and subdivided into a series of small studios for use by artists and other creatives. In addition, planning permission has recently been secured to erect 16 stacked shipping containers to provide workspace/ artist studios on land to the rear of 2 Overbury Road (HGY/2021/2891). The Framework also outlines how new commercial/ workspace will be delivered as part of new warehouse living.
e. The size and type of both the workplace space and residential accommodation to be provided, having regard to: i. the needs of SMEs for smaller unit sizes (<100m²); ii. provision for communal workspace, both internal and external; iii. the need for low-cost workspace and affordable residential accommodation to support and grow the existing start up and creative industry sectors.	The Framework provides guidance as to where new commercial space is anticipated to be delivered, the nature of this floorspace and the basis upon which this floorspace will be made available to users. The Framework also describes how workspace is integrated into and how it operates in the District and provides guidance as to how new warehouse living and the wider landscape should be designed to enable opportunities for the spaces and places created to support future working practices.
f. The interface with, and potential impact on, neighbouring uses;	The Framework establishes a set of performance criteria for new warehouse living in terms of noise attenuation and requires all new development proposals to have regard to sunlight/ daylight, overlooking distances and overshadowing and to comply with recognised planning and other guidance.

DM39 requirement	Framework response
g. The internal layout of uses and therein, the potential to optimise the positive inter-relationships and avoid, where practicable, negative impacts;	The Framework sets a series of criteria for future warehouse living, which seeks to reflect the qualities of the existing living/ working environments and overcome the weaknesses in terms of access to daylight, insulation, noise attenuation, storage, refuse arrangements and bike storage.
h. Having regard to (e – g) above, the building specifications and amenity standards to be achieved for both the workshop space and the residential accommodation;	The Framework establishes a set of baseline ‘minimum’ standards for all new and refurbished warehouse living developments. These standards have been derived from a review of Haringey’s HMO standards, London Plan housing standards, GLA guidance for large scale purpose-built shared living and from a review of existing warehouse living on the wider sites- what works and what does not work so well.
i. The specific site requirements as identified in the individual site allocations;	The Framework contain a series of area specific strategies, which take on board the various technical requirements and development guidelines outlined in the site allocations SA34.
j. Controls over the management and operation of the warehouse living spaces, in particular, the means by which to ensure that the use of the site continues to promote the genuine inter- relationship of the living and working elements;	The Framework contains a set of headline guidelines in terms of the principles for the future management and maintenance of the site and its buildings. It is envisaged that these headlines will be developed into a set of site-specific guidelines in respect of each new building.
k. Servicing and parking requirements.	The Framework sets down the principles in terms of servicing and parking requirements for future developments. The Framework requires that each individual application will be accompanied by a Transport Assessment, servicing strategy and operational waste strategy.

5.7 It is envisaged that the component parts of the Framework will be brought forward in incremental stages and the Framework, whilst setting the baseline principles for development also provides the flexibility for things to evolve and change over time.

5.8 The Framework is intended to be a ‘living’ document that will be updated as developments/ works are brought forward and in response to the lessons that will be learnt from the operation of the various new buildings and works.

5.9 This approach is considered appropriate given the embryonic nature of the development and the Applicant’s desire to evolve and develop the warehouse living concept as different buildings are implemented across the wider site.

5.10 As already discussed the latest iteration of the Framework document is submitted in support of this planning application submission.

6. Pre-application Engagement

6.1 The Application proposals have been subject to extensive consultation between the Applicant, LB Haringey officers and Members, other relevant stakeholders and the existing warehouse community.

6.2 The Framework and the DAS that accompany the Application describes the community consultation that has taken place, together with consultations that have been undertaken with the Secure by Design officer.

6.3 In the context of this Planning Statement, however, we focus on the pre-application discussion process with Haringey Planning Department.

6.4 The preparation of the Framework and the pre-application process in respect of this application was managed via Planning Performance Agreements with LBH. In relation to the Application four pre-application meetings were held on the following dates:

- PPA1: 18/03/ 2022
- PPA2: 29/06/ 2022
- PPA3: 04/10/2022
- PPA4: 18/11/2022

6.5 In addition, discussions were held with Haringey transport, environmental health and energy/ sustainability officers.

6.6 During these PPA sessions, which were run as workshops, the key issues were discussed and developed via an exchange of meeting notes. Key issues that were reviewed as part of this process included:

- Project objectives, site constraints and opportunities.
- Land use and space standards.
- The siting, layout and form of the new buildings.
- The approach to the detailed design of new buildings and the proposed materiality.
- Detailed design of the key spaces that comprise the landscape, including the approach to the public, communal and private realms.
- Pedestrian access and movement into and across the site.
- Approach to vehicular access, parking and servicing.

- The amenity impacts of the development.
- Massing, townscape views and impacts.
- Energy and sustainability targets and strategies.
- Affordability.

6.7 In addition, the application proposals were presented to a QRP panel on 17th August 2022. The scheme was reviewed at an early stage in the process in order to get feedback in relation to the key strategic 'moves' associated with the project in terms of land use mix and disposition, siting, form and massing of the proposed new buildings and the approach to the landscape/ public realm.

6.8 The report confirmed support for the approach taken within the proposals. It recognised the challenges of the scheme in terms of seeking to: '*... purposefully recreate the organic character of warehouse living that has arisen informally through the reuse of existing buildings*' and in response confirmed that the proposals represented: '*...an encouraging response to this challenge*'

6.9 The Panel confirmed that the proposed scale and form of the proposed buildings as being appropriate but suggested that there could be scope for the buildings to make a greater contribution in townscape terms. They encouraged the team to be bold in their architectural approach.

6.10 They also confirmed that they would like to see further refinement to the internal arrangements of the units: '*...to enhance the opportunities for communality and to ensure that they provide a comfortable environment for residents*'. In particular, the Panel recommended testing of overheating risks, with mitigation measures put in place where necessary. They also confirmed that they would like to see specific and quantifiable targets established for the scheme's environmental performance.

6.11 The Panel also made several detailed comments in relation to accessibility; location of entry points into the buildings; sunlight/ daylight impacts on Cara Yard and Cara House; extent of active frontage; approach to the design of the alleyway and townscape impacts.

6.12 As a result of this commentary the QRP requested that the scheme be brought back to the Panel prior to the submission. A second review was held on 14th December 2022.

6.13 The report of the meeting confirmed the panel's ongoing support for the project, and they commended the project team for its clear responses to the comments raised at the meeting on 17th August 2022.

6.14 The Panel encouraged the team to refine the design without losing the industrial feel expressed in the design, as presented. At the same time the panel, however, also suggested that the non-industrial character of the wider neighbourhood should be reflected more in the design: *'...to help make the proposals more palatable to a wider audience and to help it sit more comfortably in its context'*.

6.15 The Panel confirmed that the scale of the development is justified by its prominent location. The generous internal floor heights were seen as a positive feature, the façade treatment was considered to be well articulated and the choice of industrial materials were viewed as being appropriate.

6.16 In terms of further work, however, the panel felt that:

- The scheme could do more to celebrate the site's dramatic topography.
- The ground floor could be strengthened to read as the base.
- Alternative materials should be tested and colours to help ensure longevity. The panel advised the project team to carry out further analysis of nearby non-industrial buildings to identify aspects of its character that can be incorporated into the project's design. For example, the use of brick (referenced from nearby residential streets) may help to stitch the proposal back into its context without losing its industrial feel.
- Entrances to the buildings should be more 'celebratory'.
- Connectivity would be improved if the upper-level bridges could be used daily.
- Natural light levels should be tested throughout.
- A landscape strategy is needed to show how residents can take ownership within a structured framework, and more mature trees should also be included.
- The graffiti management approach should engage the existing community while also helping the building to age well.

6.17 The DAS and the Landscape DAS provide the design team's response to each of the issues raised by the QRP. In response to the very detailed commentary the scheme has been refined and the detailed suggestions- where considered appropriate- have been taken on board into the final design.

6.18 The proposals were also presented to the wider community at a Development Management Forum on 8th December 2022 and to the Planning Sub-Committee at a Pre-Application Briefing on 5th December 2022. The feedback from these meetings has also helped inform the scope and content of the design response and how the scheme is articulated and explained.

7. The proposed development

7.1 The application seeks Full Planning Permission for the following description of development:

‘Construction of two new buildings to provide new warehouse living accommodation (Sui Generis (warehouse living)), ground floor café/ workspace (Use Class E) and associated waste collection and cycle parking. Erection of 10 stacked shipping containers (two storeys) to provide workspace/ artist studios (Use Class E), toilet facilities and associated waste collection and cycle parking. Landscape and public realm enhancements including the widening of and works to an existing alleyway that connects Seven Sisters and Tewkesbury Road, works to Tewkesbury Road, the creation of rain gardens, greening, seating, signage and artworks and all other associated infrastructure works, including the removal of an existing and the provision of a new substation to service the new development’.

7.2 Having set the context for the application proposals and the process that has been pursued by the Applicant this section of the Planning Statement goes onto provide a brief description of the scheme. It should be read in conjunction with the Framework and the detailed information provided in the accompanying Design and Access Statement (DAS) and Landscape DAS.

Land use

7.3 The proposals involve the delivery of warehouse living floorspace in the upper floors of two purpose built new buildings (Building A and B) and other commercial floorspace, which will be accommodated within the ground and below ground floors of buildings A and B, in ten former shipping containers and within the basement levels of the existing buildings that comprise 341 and 343 Seven Sisters Road.

7.4 In planning land use terms warehouse living is considered a sui generis use. The commercial floorspace will comprise workspace, artist studios and café uses, which fall within Class E of the Use Classes Order.

7.5 13 new Warehouse Living units will be delivered, as follows:

Block A

- 3 x 14 bed units
- 1 x 12 bed units
- 5 x 5 bed units
- 1 x 4 bed unit

Block B

- 3 x 5 bed units

7.6 A total of 101-bedroom spaces are provided across the development, 68.3% (69) of which are single, 20.8% (21) are double and 10.9% (11) of all bedrooms across the site are accessible.

7.7 The unit mix reflects the mix of units already in the Warehouse District and provides the opportunity to support a variety of larger and smaller groups. The split of one and two bed units also reflects the position within the existing warehouse with most of the rooms being single and a smaller proportion being double occupancy.

7.8 In relation to the bedrooms a key feature of Warehouse Living is the double height bedroom space, which creates the opportunity to introduce a deck bed space with workspace/ living space below. The application proposals provide bedroom spaces with a 3.5m floor to

ceiling height, which creates the opportunity to insert bed decks, and increase the overall working/ living space within each bedroom.

7.9 In terms of floorspace the scheme will deliver 4,070.5 sqm (GEA) and 3,580.7sqm (GIA) of new warehouse living (sui generis) floorspace.

7.10 In addition, the scheme provides 647.6 sqm (GEA) (513.6sqm (GIA)) of café/ workspace (class E) within the ground floors of Building A and B, the lower levels of Building A, via the use of the basement areas of 341 and 343 Seven Sisters and through the erection of 10 former shipping containers.

7.11 The appendix to this statement, the application drawings and appendices to the DAS provide a more detailed breakdown of this floorspace and how it is distributed across the scheme.

Building layout, height, massing and form

7.12 Section 5 of the DAS describes the layout principles that underpin the proposals. The section describes how the two new warehouse living buildings respond to the geometries established by the existing road layout, neighbouring building lines and topography. The proximity of Cara House and the need to set back any new build to retain access to sunlight / daylight for the existing units has also influenced the siting and massing of Buildings A and B.

7.13 The key features of each of the proposed new warehouse living buildings may be described as follows:

- **Building A:** A ground plus seven-storey building which fronts onto Eade Road and a new space created at the corner of Eade Road and Seven Sisters Road. The building marks a new entry point or 'gateway' into the wider District. Two semi basement levels negotiate the topography of the Site, enabling the building to step down to Tewkesbury Road.

The height, form and appearance of the building reinforces its role as and position at the 'gateway' to the District. At eight storeys it sits in contrast to the taller city scale buildings associated with the Woodbury Down development, acting as a more local or neighbourhood marker for the District and establishing itself as such in the hierarchy of taller buildings in the area.

The building's plan form enables it to address both Eade Road and the alleyway and provide active frontage. The plant and servicing requirements of the building are accommodated such that they do not impact on any key frontage.

The seven upper floors of the building comprise warehouse living accommodation, the form, layout and spatial characteristics of which have been derived from a combination of analysis of existing warehouse living, the space and amenity standards set out in the Framework and the conditions of the Site itself.

At the top floor the mass is drawn back to enable the creation of a south facing rooftop communal garden.

The warehouse living units are accessed from Cara Yard via a communal entrance, which provides access to a central lift core, which then serves four duplex units and six single storey units.

The floorplans adopt similar layouts. Residents enter into the shared, double height living/ working spaces. Each living space has access to a generous south/ east facing balcony. Bedroom and bathrooms served by corridors leading from the shared living/ working spaces occupy the remainder of the plan. In the duplex units an internal stair from the living/ working spaces serve an upstairs kitchen eating area and more bedrooms/ bathrooms. The layouts and glazing provision ensure that all rooms and shared spaces have access to good quality daylight.

- **Building B:** A ground plus three storey building, which sits to the south of Cara House, separated by a 15m wide yard and fronting onto Eade Road. The frontage to Eade Road is activated at ground floor level by small workspace units. The upper levels provide three floors of new warehouse living, which are accessed via a communal entrance lobby, from Cara Yard. Communal bin and bike stores and plant rooms occupy the remainder of the ground floor of this building.

7.14 The massing of each building is further refined through careful incisions into each volume and then through projecting elements, balconies, lifts and brise soleils. As a result each building takes on a more dynamic form enabling it to make the most of its aspect and orientation.

- **Containers:** The proposals also include for the erection of 10 former shipping containers, stacked and arranged to front onto the alleyway and Tewkesbury Road.

7.15 Overall the proposed site layout incorporates a series of measures that will help to deliver a healthy, safe and secure environment, including:

- Providing a new network of safe and secure routes and spaces which give priority to pedestrians and which will enable existing and new residents to meander through the new spaces and places created.
- The introduction of a series of spaces and places for use by residents including balconies, shared terraces and communal yard spaces. Each space providing the opportunity for residents to get involved in the design and appropriation of the spaces.
- Creation of high-quality living and working spaces, which are well lit and offer flexibility for adaptation by residents.
- Providing a layout which encourages resident participation and communal living: the need to enter each unit via the communal living spaces; shared bathrooms and the communal living spaces themselves, which encourages the residents of each unit to interact and for any potential issues with residents to be noticed.
- The widening the existing alleyway and the introduction of new lighting and landscaping.
- Creating active frontages to Eade Road and the alleyway to ensure overlooking and enhancing safety and security.
- Incorporating light and welcoming communal entrances from Cara Yard.
- Siting of the buildings such that they avoid overlooking of existing buildings and retain sunlight/ daylight levels to acceptable levels.

Access and parking

Access and car parking

7.16 The primary vehicular access to the site will be from Eade Road to the south.

7.17 As part of the development proposals, the existing car park, situated to the south of Cara House, which provides parking for 10 vehicles will be removed. This will provide a car-free development, except for two Blue Badge parking spaces provided on-street.

7.18 Two on-site servicing bays will be provided in Cara Yard (up to 4.6t vans). A 3.9m height restrictor will be in place at the site access to ensure only suitably sized vehicles can access the site.

7.19 In addition, the existing passageway between Seven Sisters Road and Tewkesbury Road will be significantly improved. With the existing staircase being 1.5m wide, the route will be widened to be a minimum width of 3m and will expand at either end into areas of active frontage. The design will provide increased security due to passive and active surveillance.

7.20 It is also envisaged that the southern end of Tewkesbury Road will provide a new pedestrian orientated space that will enable a connection to be made into the wider District.

Cycle provision

7.21 A total of 24 cycle parking spaces are currently provided in Cara Yard, although these spaces are not covered. These will be reprovided in Cotton Mill Yard.

7.22 The proposals include a total of 101 long-stay spaces provided by:

- 32 two-tiered stands = 64 spaces (secure stores)
- 5 Sheffield stands = 10 spaces (Cara Yard)
- 3 enlarged Sheffield stands = 6 spaces (Cara Yard)
- 21 long-stay spaces within the living space

7.23 In terms of short stay spaces 3 Sheffield stands will be in Cara Yard providing 6 short-stay cycle spaces.

7.24 Four long stay spaces and 24 short stay spaces will be provided for the proposed commercial space. This provision has been assessed assuming a 50/50 split of the commercial floor space (total 647.6sqm) operating as Use Class E(a)/E(b).

7.25 In line with London Plan requirements, long-stay cycle parking provision for the commercial units will be provided within the commercial units, whilst short-stay cycle spaces will be provided in the form of 12 Sheffield stands within the public realm, equating to 24 short-stay spaces.

Landscape

7.26 The landscape proposals will deliver a key part of the site wide landscape and public realm strategy as set out in the Framework. The proposed public realm comprises an integrated network of pedestrian/ cycle priority links, yards and spaces, as follows:

- **Cotton Mill Yard.** This space is currently used by residents of Cara House. As part of the site wide strategy it is envisaged that this space will be remodelled in consultation with residents. Key works will include implementation of wider SUDS strategy, provision of replacement and new cycle spaces and new refuse storage, lighting and seating and ecological enhancements.
Given the need to work with residents on the design of this space it is envisaged that the final design and delivery of this space will be controlled via a condition attached to any future planning permission.
- **Tewkesbury Yard.** A transitional space, designed to allow pedestrian access from the Seven Sisters Road through into the rest of the District. The delivery of this element of the design will require Council cooperation as the land is in Highway ownership.
- **Seven Sisters open space and steps.** A key element and benefit of the proposals that will provide a high-quality pedestrian link between Seven Sisters Road and the wider District. The upgraded route and the new space created at the junction of Eade Road and Seven Sister's Road will together help to reinforce the gateway role of this part of the wider warehouse site.
The route is widened and will be overlooked by new commercial development.
The hard and soft landscape strategy will provide new seating areas, rain gardens and will create the opportunity to soften and green the space.
- **Cara Yard,** located between Cara House and the new buildings fronting Eade Road will provide a shared space, primarily paved in concrete block and turfstone. This will allow refuse collection from and service deliveries to the new buildings.
The space includes integrated concrete benches. Rain-gardens will bring interest and screening into the yard, providing residents valuable outdoor space while also meeting the amenity and SuDS requirements of the site wide Framework.

7.27 The landscape drawings outline a hard and soft materials palette. The Landscape DAS also provides an indication of the principles that will be used to inform a detailed lighting strategy. It is envisaged that the delivery of this lighting strategy would be controlled via a condition attached to any future planning consent.

7.28 In terms of play provision the existing District supports very few children and whilst it is envisaged that this situation may change over time it is felt unlikely that the area will support a large child population. The Framework advances a site wide strategy for play that reflects the anticipated population profile. It envisages that:

- Doorstep/ incidental play will be integrated throughout the wider site;
- Opportunities for natural play will be available in the more heavily planted areas of the site; and
- Older children/ teen play would be delivered through a package of improvements to Tewkesbury Open Space.

7.29 The Framework envisages that the Tewkesbury Open Space improvements will be delivered as part of the phase of works that will see the upgrading of the Warehouse units that back onto this space in Overbury Road.

7.30 The Application proposals incorporate opportunities for incidental and natural play, as part of the overall strategy.

7.31 In terms of new communal space, each unit is provided with a large balcony and a shared garden is provided on the roof of Block A. The balcony spaces will deliver 212.5 sqm of outdoor shared amenity space. The roof garden (102sqm) will provide an important shared amenity space, an opportunity for growing, and an opportunity to enhance the ecology and biodiversity.

7.32 In addition, 135sqm green/ blue roofs are proposed to Block B and to part of Block A (242sqm), the former will be an extensive green roof and the latter will sit below a PV panel array.

7.33 The shipping containers also support green roofs, delivering a further 126sqm of planted roof space.

7.34 In addition to the green/ blue roofs the public realm also incorporates other SUDS measures, including permeable paving and rain gardens.

7.35 Finally, the proposals will deliver a biodiversity net gain of 377.76% of the pre-development score (or an increase of 0.38 habitat units) and an UGF score of 0.35.

External appearance

7.36 A key challenge in terms of the building's appearance was to maintain the industrial feel and character of the existing warehouse buildings. In response the design team has delivered something London has not seen before- it does not look like a residential building, or a hotel or student housing- it is a building that identifies and clearly articulates itself as contemporary warehouse living:

- The internal arrangement of the key functions of each warehouse living unit are expressed externally- the bedrooms, the double height shared living spaces, the entrances and shared amenity spaces.
- The materials, textures and detailing draw from the existing warehouses and other industrial buildings in the District.
- The way in which materials are combined and layered give a nod to the way in which the existing warehouses have been repurposed and adapted over time.
- There are opportunities for resident adaptation, graffiti art and bespoke signage and art works.
- The colours and the way in which colour is applied to different elements i.e. contrasting metalwork and window surrounds borrows from the District.
- The use of external metalwork such as balustrades, external balconies and bridges.

7.37 At the same time- and unlike all of the existing warehouse buildings- the façade has had to satisfy contemporary building control standards, to be highly sustainable, reflect the requirements of the circular economy, deliver a high level of amenity for residents living in the buildings and maintain affordability for residents. All these pressures and demands could have compromised the project and resulted in a very dull 'budget hotel' response to the site. The design team has, however, through the built form, clever selection and use of materials, colour choice, arrangement of the façade elements, use of signage, providing opportunities for personalisation created something that looks new, dynamic and – well yes- unique.

Energy and sustainability

7.38 The proposal constitutes a high quality and sustainable development which contributes positively to the area. Accordingly, it includes the following credentials:

- The intensification/ re-use of a vacant brownfield site, ensuring efficient use of land and application of circular economy principles;
- Retention and integration of existing buildings, reducing disruption to existing occupants, minimising construction waste and the embodied carbon of the development;
- Efficient design of the proposed massing, openings and internal layouts, so that habitable spaces across the site benefit from adequate daylight and sunlight levels, whilst impacts to neighbouring buildings are kept to a minimum;
- A focus on minimising energy demand and carbon emissions for heating, lighting and cooling in line with the energy hierarchy;
- An electricity led servicing strategy consisting of photovoltaic panels and Air Source Heat Pumps (ASHPs), ensuring no combustion on site and ensuring good levels of air quality;
- The implementation of an energy strategy that will deliver an overall regulated CO2 saving of 53% against a Part L compliant scheme.
- Fabric first-solar shading to reduce heat risk of overheating and high performing building envelope, targeting BREEAM Excellent.
- Responsible material selection, including the use of low embodied carbon materials as far as practically possible;
- An integrated landscape strategy, targeting a UGF score of 0.35 and comprising a mix of private, communal and public amenity spaces.
- Car free development and extensive long and short stay cycle provision.
- Sustainable Urban Drainage Systems (SuDS) comprising green / blue roofs, rain gardens and targeting greenfield run-off rates.
- Effective pollution management and control: the development is not expected to have any significant adverse effects to air, noise, land or watercourses.

8. Policy background

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

8.2 The relevant parts of the Development Plan for the Application consist of the following policy documents:

- New London Plan, 2021
- Haringey's Local Plan Strategic Policies 2013-2026 (March 2013, consolidated with alterations since 2017) (July 2017).
- Development Management Development Plan Document (DPD) (July 2017).
- Site Allocations Development Plan Document (DPD) (July 2017).

8.3 Based on the content of the Application proposals the following development plan policies are considered of most relevance to the scheme:

New London Plan (2021)

- GG2 Making the best use of land
- GG3 Creating a healthy city
- CG4 Delivering the homes Londoners need
- CG8 Increasing efficiency and resilience
- D1 London's form, character and capacity for growth
- D3 Optimising site capacity through the design-led approach
- D4 Delivering good design
- D5 Inclusive design
- D8 Public realm
- D9 Tall buildings
- D12 Fire safety
- D13 Agent of Change
- D14 Noise
- H1 Increasing housing supply
- H16 Large-scale purpose-built shared living
- S4 Play and informal recreation
- E3 Affordable workspace
- HC1 Heritage, conservation and growth
- HC6 Supporting London's culture and creative industries
- G1 Green infrastructure
- G5 Urban greening
- G6 Biodiversity and access to nature
- G8 Food growing
- SI 1 Improving air quality
- SI 2 Minimising greenhouse gas emissions
- SI 3 Energy infrastructure
- SI 4 Managing heat risk

- SI 5 Water infrastructure
- SI 7 Reducing waste and supporting the circular economy
- SI12 Flood risk management
- SI13 Sustainable drainage
- T1 Strategic approach to transport
- T2 Healthy Streets
- T3 Transport capacity, connectivity and safeguarding
- T4 Assessing and mitigating transport impacts
- T5 Cycling
- T6 Car parking
- T7 Deliveries, servicing and construction

Haringey's Local Plan Strategic Policies 2013-2026 (March 2013, consolidated with alterations since 2017) (July 2017).

- SP1 Managing growth.
- SP4 Working towards a low carbon Haringey.
- SP5 Water management and flooding
- SP6 Waste and recycling
- SP7 Transport
- SP11 Design
- SP13 Open space and biodiversity
- SP14 Health and well-being
- SP15 Culture and leisure

Development Management Development Plan Document (DPD) (July 2017).

- DM1 Delivering high quality design
- DM2 Accessible and safe environments
- DM3 Public realm
- DM5 Locally Significant Views and Vistas
- DM6 Building heights.
- DM17 Houses in Multiple Occupation
- DM19 Nature Conservation
- DM21 Sustainable design, layout and construction
- DM22 Decentralised energy
- DM23 Environmental Protection
- DM24 Managing and reducing flood risk
- DM25 Sustainable drainage systems
- DM26 Critical Drainage Areas
- DM29 On site management of wastewater and water supply
- DM31 Sustainable transport
- DM32 Parking
- DM37 Maximising the Use of Employment Land and Floorspace
- DM38 Local Employment Area – Regeneration Areas
- DM39 Warehouse Living
- DM48 Use of planning obligations
- DM49 Managing the provision and quality of community infrastructure
- DM55 Regeneration and masterplanning

Site Allocations Development Plan Document (DPD) (July 2017).

- SA34: Overbury & Eade Rds
- SA35: L/B Seven Sisters & Tewkesbury Rds
- DEA 24: Eade/ Overbury Rd: Local Employment Area: Regeneration Area

8.4 LBH is preparing a new Local Plan which will replace the existing Local Plan documents adopted in July 2017. Consultation on a Regulation 18 New Local Plan First Steps documents took place between 16 November 2020 and 1 February 2021. The First Steps document sets out the key issues to be addressed by the New Local Plan, asks open questions about the issues and challenges facing the future planning of the borough and seeks views on options to address them. It has very limited material weight in the determination of planning applications.

8.5 Other documents considered material considerations in relation to the applications include:

- National Planning Policy Framework “The Framework” (2021)
- National Planning Practice guidance
- London Plan Guidance (LPG): Fire Safety LPG (draft)
- Urban Greening LPG (draft)
- Air Quality Positive LPG (draft)
- Whole Life Carbon LPG
- Be Seen energy monitoring LPG
- Sustainable Transport, Walking and Cycling (draft)

8.6 Based on the content and requirements of these policies it is considered that the proposals give rise to the following key planning considerations:

- Principle of development- site allocations
- Principle of development – land use considerations
- Design, layout and appearance
- Inclusive design
- Impact on amenity
- Highway safety and parking
- Energy and climate change
- Flood risk and drainage
- Fire
- Environmental impacts
- Planning contributions

9. Planning considerations

9.1 Considering the development objectives of the project, and in the context of the policy framework set out above, the following paragraphs consider the key planning issues associated with the application proposals.

A. Principle of development- Site Allocations

9.2 The proposals involve the delivery of two new purpose-built warehouse living buildings and mixed commercial development.

9.3 Warehouse Living in the Haringey context is defined by the Council in the various Development Plan policy documents as:

'...“The occupation on a communal basis of a large footplate building, a mixed residential and employment use.” It does not fall within a specific use class – and is not live/work development – and as such is considered a Sui Generis use.

9.4 The Council has made provision for proposals for warehouse living at selected Local Employment Regeneration Areas. The Overbury Road/ Eade Road site in which the Application Site sits is one such area.

9.5 The policies seek to regularise warehouse living use, and:

'...through the planning process, ensure existing and future occupants are provided with an appropriate standard of living; the existing creative industries and SME sectors are supported and given room to grow; and the creative living and working offer of these sites is maximised. The expected outcome is to secure a long-term sustainable economic future for these employment land sites that builds on the amenity being created and complements the unique character of the areas in which they are situated'.

9.6 In pursuit of this ambition policy DM39 advocates a masterplan approach to guide the future development of each designated area.

9.7 Part D of Policy DM39 identifies a series of matters that should be addressed by each masterplan. In addition, the individual site allocations identify a series of site-specific requirements. As confirmed under Section 5 a masterplan document has been produced for the wider Overbury/ Eade Road Site Allocation (SA34) by the Applicants and

is included with this Application. In addition, Section 5 of this Planning Statement confirms that each of the matters defined by DM39(D) have been addressed by the wider masterplan.

9.8 In relation to the site-specific requirements of SA34 and SA35, the Application proposals:

- Introduce a building on the corner of Eade and Seven Sisters Rds, which will mark and reinforce the gateway into the warehouse district.
- Retain and enhance 341-343 Seven Sisters Road.
- Deliver an improved connection between Seven Sisters Road and Tewkesbury Road.
- Deliver commercial uses within the lower floors of the proposed buildings, which will activate and animate all the roads and links which surround the Application Site.
- Introduce a series of proactive measures to enhance pedestrian permeability and safety into and through the area.
- Maintain the industrial character of the warehouse district.
- Support the principles of communal living.
- Have been informed by and are supported by a FRA, Drainage and Ground Investigation Studies, which deal with issues of contamination and mitigation and drainage.

9.9 The site wide masterplanning framework has been subject to scrutiny from officers, the QRP panel and existing warehouse residents. The Application Proposals have then been prepared in the context of this Framework.

9.10 Given the above the submission of this application proposal accords with the process, content and site-specific requirements of DM39 and Site Allocations 34 and 35.

9.11 In terms of the design and operation of the specific land uses proposed we provide further commentary in the next section.

B: Principle of development – Land use considerations

Warehouse Living- Quality of accommodation

9.12 The application proposals involve the delivery of two new warehouse buildings and 13 units of accommodation that are together capable of supporting up to 133 people.

9.13 Warehouse Living is a bespoke type of shared living and working. It is a type of non self-contained housing that is made up of private rooms and communal living and working spaces. It differs from self-contained housing (use class C3) because there is an emphasis on communal living: shared kitchen diners and shared living/ working spaces.

9.14 It also differs from hotels (use Class C1) and hostels (sui generis) because the individual tenancies are longer than three months.

9.15 Several of the existing warehouses are classified as large scale (sui generis) HMOs. The scale of the application proposals, the type of space and the extent of communal/ shared living and working spaces, however, moves the development away from a more traditional HMO use.

9.16 The application proposals will deliver a bespoke type of shared living and working accommodation.

9.17 In terms of planning guidance associated with the proposed use the GLA in January 2022 published guidance for Large Scale Purpose Built Shared Living (LSPBSL). The document encourages Boroughs to use the guidance to inform site allocations where large-scale purpose-built shared living is being proposed.

9.18 Haringey's Development Plan policy pre-dates this guidance. In the context of this Planning Statement and to determine the acceptability of the proposals in the context of both Regional and Local policy we consider the content/ guidance contained in both documents.

9.19 The GLA guidance requires policies and site allocations for LSPBSL to contribute toward creating mixed and inclusive neighbourhoods, to consider size, mix and affordability, to be located in accessible locations and to be car free.

9.20 Specific guidance is provided in relation to the design and space standards of communal facilities. Based on the space standards provided in this document, Haringey's HMO standards, GLA's Housing Design Standards, a review of layouts/ spaces within existing warehouse buildings in the District and consultation with residents the design team have established a baseline set of design and space standards for new warehouse living.

9.21 These standards form part of the Framework document. In all cases the standards either meet or exceed the official and adopted minimum GLA/ HMO standards and the Framework envisages that all new warehouse living advanced within the District will meet or exceed these baseline standards.

9.22 The appendix attached to this statement provides a review of the application proposals against the Framework baseline design and space standards and in so doing demonstrates that the units meet or exceed the standards set.

9.23 In terms of comparing Warehouse Living to more traditional housing the DAS on pages 49 and 50 provides a comparison of the area and volume of space available to occupiers of a conventional terrace house and a flat, a conventional double room and a warehouse double room. As a result of this analysis, it can be demonstrated that warehouse living in terms of the average space available per person is broadly comparable to that of conventional housing space standards, although offering several other benefits associated with communal living.

Warehouse Living- Affordability

9.24 In addition to the spatial qualities and communal nature of warehouse living, another key feature of this type of accommodation is its relative affordability when compared with other forms of rented living accommodation.

9.25 As already discussed, maintaining this affordability was raised as a key concern by existing warehouse residents as part of the consultation.

9.26 Given the current built cost position and the requirements in terms of meeting contemporary building and sustainability standards the ability to maintain such affordability has been a key challenge for the project.

9.27 To demonstrate the economics of a scheme of this nature the Application is accompanied by a viability statement. The statement assumes that 10% of the commercial floorspace will be let out at an affordable rent and the warehouse living rooms will be let at rental levels at around £950 per room

9.28 Current rental levels in the District range from £550-£1,000 per room. Given the new build nature of the accommodation the Applicant considers that the space ought to secure beyond the upper end of the existing scale, more in line with Co-Living projects elsewhere more in line with Co-Living projects elsewhere. (The Viability Report suggest a range for co-living rents starting at £1,200 per month). At the same time, however, this is an untested model, and the Applicant is mindful that affordability is a key issue for residents, hence the £950 per room rental level assumed in the viability appraisal.

9.29 The appraisal is accompanied by a cost plan and makes assumptions as to the other costs in terms of Mayoral CIL, Section 106, professional and legal charges etc.

9.30 Based on the income assumptions and costs the appraisal confirms a Gross Development Value for the scheme of £19,190,000 (rounded).

9.31 The Benchmark Return is assessed as £2,399,000, based on market levels of return on GDV and hence a net residual return of -£1,482,000 (negative).

9.32 This negative position is not unexpected given the various site constraints and associated abnormal costs and the unique nature of the development. The Applicant acknowledges that this is the first new build warehouse living building to be developed in the District and that there will be opportunities to mitigate this negative position through the bringing forward of other more commercial development and through economies of scale as other warehouse living buildings are brought forward on the Site.

9.33 It is anticipated that the dynamic nature of the Framework document, which accompanies the Application will be able to capture and support the ongoing viability situation such that as things evolve and get delivered then opportunities for cross-subsidy/ contributions to more affordable/ non-income generating functions can be secured and that the current negative financial position can be reconciled.

9.34 This dynamic viability position and the need for cross-subsidy is acknowledged by DMP 39.

Commercial floorspace

9.35 The proposals also include 513.6sqm of mixed commercial development within the lower floors of Buildings A and B, in former shipping containers and within the lower floors of 341 and 343 Seven Sisters Road.

9.36 It is envisaged that this mixed floorspace will provide accommodation as workspaces, artist studios and café space for warehouse residents and the wider community.

9.37 The SA34 site allocation and its inclusion in a Local Employment Area envisage the introduction of employment generating uses within the ground floors of mixed use developments or in purpose-built blocks.

9.38 Policy DM38 requires proposals advanced in LEAs to provide demonstrable improvements in an area's suitability for continued employment and business use, having regard to:

- i. The quality, type and number of jobs provided, including an increase in employment densities where appropriate;
- ii. Flexibility of design to enable adaptability to different business uses over the lifetime of the development; and
- iii. Environmental quality of the site.

9.39 The Application proposals will enable the delivery of new warehouse living, which will provide flexible space in which to live and work and dedicated commercial floorspace suitable for artists and small/ start up business uses.

9.40 It is also envisaged that 10% of this accommodation will be available at affordable rental levels.

9.41 The proposals deliver a mix of uses that are compatible with the wider site allocations and area designations and will deliver a high-quality shared living and working environment at rental that remain compatible with the existing rent levels across the District.

C. Design, layout and appearance

9.42 The NPPF (paras. 127 and 130) requires planning policies and decisions to ensure that developments: ‘... are visually attractive as a result of good architecture, layout and effective landscaping... Permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.”

9.43 London Plan Policy D3 requires developments to make the best use of land by following a design-led approach that optimises the capacity of sites. Furthermore, this policy notes that proposals should enhance local context by delivering buildings that positively respond to local distinctiveness through their layout, orientation, scale, appearance and shape, with due regard to existing and emerging street hierarchy.

9.44 Policy D4 of the London Plan notes the importance of scrutiny of good design by borough planning, urban design, and conservation officers as appropriate. It emphasises the use of the design review process to assess and inform design options early in the planning process (as has taken place here).

9.45 GLA guidance on LSPBSL contains specific design guidance for large scale communal use buildings, as follows:

- *active uses and public amenities should be designed and located to activate the street and public amenities on the ground floor should front the street or public realm; and any blank walls, dense vegetative screening or other design elements that visually cut the LSPBSL community off from the local surroundings or vice versa should be avoided.*
- *Any public amenities such as restaurants and bars should encourage use by the surrounding local community as well as residents.*
- *The development should ensure public realm is designed with different users in mind, including both residents and people in the surrounding communities who use wheelchairs’*

9.46 At the local level proposals are encouraged to enhance and enrich Haringey’s built environment, in line with Local Plan Policy SP11. DPD Policy DM1 outlines that

developments should relate positively to their locality, with particular regard to: ‘...*building heights, form, scale and massing around the site. Furthermore, proposals should give full consideration to: urban grain, building lines, rhythm of plot/building widths, active frontages to the public realm and distinctive local architectural styles, detailing and materials’.*

9.47 Policy DM6 of the DM DPD expects all development proposals for taller buildings (i.e. those which are greater in height than their surroundings and are less than ten storeys in height) to respond positively to local context and achieve a high standard of design in accordance with Policy DM1.

9.48 The application is accompanied by a DAS and landscape DAS, which together describe the proposals in detail in terms of the built form and the options explored as part of the pre-application process; how the design of the individual buildings have been designed to respond to the existing character and materiality of their surroundings, how the layout enables and encourages movement into and through the wider site, how the impact of cars and servicing vehicles are minimised and the pedestrian/ cyclist is given priority, how secure by design principles have been integrated into the proposals, how buildings have been sited and arranged in order to ensure appropriate outlook, privacy and amenity, how the public realm and landscape maximise opportunities for social interaction and how the architecture responds to the existing industrial character and ensures robust and practical building forms.

9.49 Given the unique nature of the land use and the fact there is limited precedent or standards to follow this design process has been more in depth than more standard building design processes – involving a wide range of consultees and in-depth scrutiny from the Council and its QRP panel and existing residents.

Quality Review Panel

9.50 The DAS provides a detailed description of the QRP process, the issues raised and the design response. As already discussed it is considered that the points raised by the QRP have been fully explored and satisfactorily addressed.

C1 Height, scale and massing

9.51 London Plan policy D9 deals with tall buildings and the policy contains three parts:

- A. Definition:
Boroughs should determine the height at which a building is considered tall for specific localities, but should not be less than 6 storeys.
- B. Location
 - 1) Boroughs should determine if there are locations where tall buildings may be an appropriate form of development, subject to meeting the other requirements of the Plan.
 - 2) Any such locations and appropriate tall building heights should be identified on maps in Development Plans.
- C. Impacts
Developments should consider the visual, functional, environmental and cumulative impact of taller buildings.

9.52 Policy DM6 of the DM DPD defines tall buildings as those which are two to three storeys higher than prevailing surrounding building heights. Tall buildings are defined in the Strategic Policies Local Plan as being buildings 10 storeys and over. The proposed Building A comprises a ground plus 7 storey building and therefore, in line with the local policy criteria stated above, would not be considered to be a tall building. The development is, however, a 'taller' development, which will project above the prevailing height of the surrounding area and hence there is an expectation that the building should be of a high standard of architectural quality and design, should protect and preserve existing important views and should conserve and enhance the significance of heritage assets and their settings.

9.53 The Application Site is identified as a potential location for a tall building (Figure 2.2 of DMPD). The Site Allocation also confirms that a new building on the corner of Eade Road and Seven Sisters Road should 'mark the gateway to the warehouse district'.

9.54 The DAS confirms the rationale for the height and form of the building and its role as a local/ neighbourhood marker for the District. In line with DM6 the height, mass and appearance will draw attention to the District on the skyline and will create a new gateway into the area.

9.55 The building will positively engage with the street environment, will activate and animate the pedestrian link between Seven Sisters and Tewkesbury Roads and the design will clearly articulate the proposed use and it will distinguish itself from other more established land uses in the area i.e. a residential apartment block, office block etc.

9.56 In terms of understanding the impact of the development the application is accompanied by a Townscape, Heritage and Visual Impact Appraisal (THVIA), which considers the impact of the proposals on a range of short, medium and long-distance views and the impact of the proposals on nearby heritage assets.

9.57 Based on the assessment the Visual Appraisal concludes that the proposal would increase the visibility of the Site from the surrounding townscape, roads and immediate areas of open space and confirms that the proposals would lead to the following residual, direct, permanent, effects on the representative views:

- Moderate and beneficial effect – RV2: Tewkesbury Road and RV6: New River Footpath
- Moderate to minor and beneficial effect – RV3: Seven Sisters Road (north) and RV4: Vartry Road, RV5: Seven Sisters Road (south)
- Minor and beneficial effect – RV7: Eade Road
- Minor and neutral effect – RV1: Alexandra Palace and RV11: Chestnuts Park

9.58 On the remaining views considered the assessment confirms that the proposals would have no or negligible effects.

9.59 The THVIA also confirms that the residual, indirect and permanent effects of the proposals on heritage assets are limited to those assets located close to the Site:

'The effect would be moderate to minor and neutral for designated heritage assets (the New River, the East and West Reservoirs Conservation Area, grade II listed Woodberry Down Community JMI School), and Minor and neutral for locally listed buildings (the former Maynard's Sweet Factory Vale Road, 100 Amhurst Park and Woodberry Down Baptist Church, Seven Sisters Road).'

9.60 In terms of 'functional impacts' as outlined in London Plan policy D9 the application proposals have

been subject to detailed scrutiny from Secure by Design officers and have been designed in accordance with current fire safety regulations. In addition, the operational aspects of how the building will be secured, serviced and accessed have been considered from the outset and have actively been planned for. In addition, the application is accompanied by a Transport Assessment which considers the impact of the proposals on the area's transport network and the integration of the building into the wider movement network.

9.61 In terms of environmental impact, the proposals have been subject to wind testing, daylight, sunlight penetration, noise and overheating assessments.

9.62 The wind assessment that accompanies the application shows that the wind microclimate is likely to remain suitable for the planned pedestrian uses and no specific wind mitigation measures are required.

9.63 The sunlight/ daylight assessment that accompanies the application confirms that 93% of habitable rooms in the development meet the target daylight value, including all living rooms, and all rooms that contain a window that faces within 90° of due south meet the target annual sunlight value.

9.64 The analysis also shows that most windows around the Site meet the target daylight and sunlight values with the proposal in place.

9.65 The noise assessment that accompanies the Application defines the glazing specification which will provide internal noise levels for all internal living environments commensurate to the design range of BS8233.

9.66 In addition to the above the TA describe the service arrangements for the Site and the Management Strategy describe how the buildings will be managed as part of the wider strategies that are already in place for the wider District sites.

9.67 As a result of the co-ordinated design work undertaken through the pre-planning stages of the report the Applicant can demonstrate that the taller building A will have an acceptable environmental, functional, operational, townscape and heritage impact and hence accords with London Plan policy D9 and Haringey DM policy.

C2 Layout

9.68 The DAS provides a detailed description of those internal and external factors that have shaped the form and layout of the proposals. The response enables the building to create and animate a network of new and existing spaces and links. It also allows the proposed building to respond positively to the amenity (privacy, outlook and sunlight/ daylight) of existing neighbouring buildings, whilst maximising the opportunity to take advantage of the site's aspect.

C3 Form, materiality and detailing

9.69 Site Allocation SA34, contains a series of guidelines for the future development of the area. In terms of new buildings the guidelines state that they should: *'...continue to be designed to **maintain the unique warehouse character of the area**'*.

9.70 As already discussed, defining what is the unique warehouse character and then articulating in a contemporary new building was a key objective of the proposals. The DAS provides a detailed description of the process of achieving this objective, whilst at the same time satisfying contemporary building regulations and environmental objectives and maintaining viability.

9.71 The proposals deliver on the objectives set and provide a high-quality response to the Site.

C4 Public realm and landscape

9.72 London Plan Policy G5 requires major development proposals to contribute to the greening of London by including urban greening as a fundamental element of site and building design. Commercial development should meet a target urban greening score of 0.3 and residential developments should meet a target of 0.4. Policy G6 states that Sites of Importance for Nature Conservation (SINCs) should be protected and seeks to secure biodiversity net gain.

9.73 Policy SP13 of the Local Plan seeks to protect and improve open space and provide opportunities for biodiversity and nature conservation. Policy SP11 promotes high quality landscaping on and off-site.

9.74 Policy DM1 of the Development Management DPD requires proposals to demonstrate how landscape and planting are integrated into the development and expects development proposals to respond to trees on or close to a site. Policy DM21 expects proposals to maximise opportunities to enhance biodiversity on-site.

9.75 As already discussed, the site wide Framework advances a comprehensive and integrated landscape and public realm strategy for the site, which considers access, movement, parking, drainage, urban greening, ecological enhancement and materiality in an integrated manner.

9.76 The Application proposals ensure the delivery of the part of the Framework that the Application covers. It enables the delivery of:

- An integrated strategy of new (643sqm) and upgraded (471sqm) spaces and links.
- A soft landscape strategy, which gives priority to native species.
- A BNG score of 377.76%.
- A UGF of 0.35, which is considered appropriate given the part commercial/ part residential nature of warehouse living.
- A SUDS strategy, which combines permeable paving and rain gardens.
- New, secure short and long stay cycle parking.
- New wayfinding, seating and lighting.
- Opportunities for informal play.

C5 Communal/ shared amenity space

9.77 The scheme delivers 182.4 sqm of shared private amenity space in Block A and 30.1 sqm in Block B. In addition, there is shared communal garden space (102 sqm) at the roof level of Block A. Thus, the scheme delivers 314.5sqm of shared private amenity space, which based on a maximum occupancy of 133 residents equates to 2.37sqm of communal amenity space per person.

9.78 The GLA guidance on LSPBSL recommends that 1 sqm of external shared communal space should be provided per resident. The nature of the communal space envisaged by this guidance does not quite accord with the specifics of

a warehouse living unit, which has much more communal living and working space than a standard co-living model. The amenity spaces are accessed directly from shared communal spaces within each unit and hence each unit has its own external communal space and then the roof space provides one larger communal garden for use by all.

C6 Accessibility

9.79 London Plan Policy D5 explains that proposals should ensure the highest standards of accessible and inclusive design. Developments should be convenient and welcoming with no disabling barriers, providing independent access without additional undue effort, separation or special treatment. In addition, DPD Policy DM2 requires that all new developments should be used safely, easily and with dignity by all.

9.80 The Application is accompanied by an Access and Inclusive Design Statement which describes how the scheme is being designed to take into consideration the requirements of the London Plan 2021 and relevant London Borough of Haringey planning policies to create an accessible and inclusive built environment.

9.81 All Warehouse units are designed to M4(2). 11 of the bedrooms are designed to M4(3) standards and within these units all communal spaces are designed to meet the enhanced criteria set out in M4(3).

C7 Archaeology

9.82 Policy HC1 of the London Plan states that development proposals should identify assets of archaeological significance and use this information to avoid harm or minimise it through design and appropriate mitigation. Policy DM9 of the DM DPD states that all proposals will be required to assess the potential impact on archaeological assets and follow appropriate measures thereafter in accordance with that policy.

9.83 The application is accompanied by an archaeological desk-based assessment, which confirms that site is considered likely to have a generally low archaeological potential for all past periods of human activity.

9.84 Based on the available information, the assessment concludes that no further archaeological mitigation measures are required.

Summary

9.85 The proposed design approach has been based upon a rigorous process, contextual analysis and driven by the principles of good design and environmental sustainability and has been informed by extensive engagement with existing warehouse residents, Haringey officers and QRP and other stakeholders.

9.86 The architecture of the Proposed Development is of a high quality with each building presenting well considered elevations to all sides. The overall design is of an ordered and cohesive appearance with carefully handled variety. The use of modelling and the detailed design will provide elevations with a high level of articulation with crisp detailing. The palette of materials is of high quality and appropriate for the industrial/ warehouse character of the area.

9.87 Building A will fulfil the policy ambition to create a new gateway into the District. The height of the building and its location will mean that it will have limited effect on the wider area and there will be no harm to the settings of any heritage assets.

9.88 Finally, the operational and functional impacts have been carefully considered and kept within acceptable limits.

D. Sunlight, daylight and overshadowing

9.89 London Plan Policy D6 outlines that design must not be detrimental to the amenity of surrounding housing. Specifically, it sets out that proposals should provide sufficient daylight and sunlight to surrounding housing, while also minimising overshadowing.

9.90 Development proposals should ensure a high standard of privacy and amenity for a development's users and neighbours, in accordance with DPD Policy DM1. Specifically, proposals are required to provide appropriate sunlight, daylight and aspects to adjacent buildings and land. An appropriate amount of privacy should be provided to neighbouring properties by avoiding overlooking.

9.91 The sunlight/ daylight assessment which accompanies the application considers the impact of the proposals on Amhurst Court, Vivian House, 1-19 Tewkesbury Road and Cara House.

9.92 The analysis confirms that most windows in these properties will meet the target daylight and sunlight values with the proposals in place and where this is not the case, the window in question either meets the alternative target value or is obstructed to daylight and sunlight by the architecture of Cara House.

9.93 Internally, 93% of habitable rooms meet the target daylight value, including all living rooms, and all rooms that contain a window that face within 90° of due south meet the target annual sunlight value. Each bed space is served by a large window and double height spaces which means that all bed rooms will feel well daylit. Furthermore, every future resident will have access to generous and well daylit shared spaces with east and south-facing aspects.

9.94 In overshadowing terms, the neighbouring gardens at 347-351 Seven Sisters Road do not meet the target sunlight amenity value in March but are shown to be well sunlit in June and thus are likely to be well sunlit across the summer months when this space is most likely to be in use. It should also be noted that this space is obstructed to sunlight in the existing scenario by the position of 347-351 to the south -east of the space.

E. Parking and Highway Safety

9.95 The NPPF (Para. 110) makes clear that in assessing applications, decision makers should ensure that appropriate opportunities to promote sustainable transport modes have been taken up and that the design of streets and other transport elements reflects national guidance (including the National Design Guide).

9.96 London Plan Policy T1 sets a strategic target of 80% of all trips in London to be by foot, cycle or public transport by 2041 and requires all development to make the most effective use of land. London Plan Policy T4 explains that proposals should reflect and be integrated with current and planned transport access, capacity and connectivity. In terms of cycling, London Plan Policy T5 requires developments to provide appropriate levels of cycle parking, which should be fit for purpose, secure and well located. London Plan Policy T6 sets out that car parking should be restricted in line with the levels of existing and future public transport accessibility and connectivity.

9.97 Other key relevant London Plan policies include Policy T2 – which sets out a ‘healthy streets’ approach to new development and requires proposals to demonstrate how it will deliver improvements that support the 10 Healthy Street Indicators and Policy T7 – which makes clear that development should facilitate safe, clean and efficient deliveries and servicing and requires Construction Logistics Plans and Delivery and Servicing Plans.

9.98 London Plan Guidance for Large Scale Purpose Built Shared Living states that such developments should be car free and cycle parking provided per London Plan Policy T5 Cycling, Table 10.2 Use Class: Sui generis.

9.99 Local Plan Policy SP7 outlines that the Council aims to tackle climate change, enhance environmental quality and improve transport safety by promoting public transport, walking and cycling. High trip generating developments should be located where public transport accessibility is high and car parking is minimised, in accordance with DPD Policy DM31.

9.100 The application is supported by a Transport Assessment (TA), prepared by Velocity. This document considers the wider transport implications of the project, including its impact on the highways network, public transport and pedestrian environment.

9.101 An Operational Waste Management Strategy (OWMS), Draft Travel Plan and Outline Delivery and Servicing Plan (DSP), also prepared by Velocity accompanies the application.

E1 Walking and cycling

9.102 The TA has been prepared based on the Healthy Streets and Vision Zero approaches and includes an Active Travel Zone (ATZ) Assessment that identifies and assesses key walking and cycling routes in relation to the Healthy Streets criteria.

9.103 The ATZ Assessment within the TA includes an ATZ Map that shows all potential key destinations within the ATZ, confirms the high level of public transport access and illustrates the Site’s potential for active travel.

9.104 The development will deliver an enhanced public realm that will improve access into and through the Site for warehouse residents and visitors. An existing car park will be removed and will be replaced by pedestrian orientated yard space for use by existing and new warehouse residents. The alleyway which runs between Seven Sisters and Tewkesbury Road will be widened to be a minimum width of 3m and will be relandscaped. New commercial uses will overlook this space, providing passive and active surveillance of the route. In addition, the southern end of Tewkesbury Road will be upgraded and relandscaped to give priority to pedestrians and cyclists, which in turn will provide an important new space and link for pedestrians and visitors moving from the alleyway into the wider Eade Road / Overbury Road Warehouse District Site.

9.105 New short stay cycle parking will be provided within the public realm as well as planting to create a more pleasant environment for site users and visitors.

9.106 In summary, the TA shows that the Site is well located to promote active travel given its proximity and routes to key destinations, nearby town centres and social infrastructure, and shows that the proposed development and associated improvements to the public realm will significantly increase the Site’s performance against the Healthy Streets criteria and will promote active modes of transport, including walking and cycling.

E2 Trip generation & traffic

9.107 The warehouse living element of the proposal is expected to result in an uplift in trips on the underground and bus network throughout the day, given the site's PTAL of 5. The levels of uplift are shown to have a negligible impact on the public transport network.

9.108 In terms of servicing the proposed development is expected to generate 46 two-way servicing trips on-site throughout the day and 22 on-street two-way servicing trips throughout the day.

9.109 A Draft Residential Travel Plan (RTP), Draft Delivery and Servicing Plan (DSP) and Outline Construction Logistics Plan have been prepared which sets out a range of preliminary management strategies and measures to support and encourage sustainable travel, manage servicing and deliveries and manage construction traffic. It is envisaged that a full version of these documents will be secured via conditions/ Section 106 obligations.

E3 Deliveries and servicing

9.110 The TA confirms that two on-site loading bays will be provided within the site. This will enable deliveries to be undertaken in 4.6t vans or smaller within the site. Access and egress to the site is in forward gear. The traffic survey data and trip generation exercise presented in the TA demonstrates that the two on-site spaces will be sufficient to accommodate the expected on-site servicing demand.

9.111 For larger vehicles and refuse collection vehicles, it is proposed servicing is undertaken on-street on the yellow lines on Eade Road. For longer stays, vehicles can utilise the 'Pay and Display' bays which provide a maximum stay of 2 hours.

9.112 It is expected that the two delivery bays will be managed by booking slots with the site management for loading and deliveries to avoid multiple vehicles arriving on-site.

9.113 Waste management facilities for the proposed development have been designed in accordance with the Council's Waste and Recycling Storage and Collection Guidance for Residential Properties. All waste storage facilities will be designed to British Standard BS5906:2005 Waste Management in Buildings – Code of Practice.

9.114 The TA confirms that the principles of the operational waste strategy have been discussed and agreed with the Council's waste officer during pre-application discussions.

9.115 Residents will be provided with separate storage for the following:

- Residual waste;
- Dry-Mixed Recycling (DMR); and
- Food Waste.

9.116 Residential waste storage capacity has been calculated using the metrics agreed with the Council's waste officer for the Harringay Warehouse District, with residual waste and DMR stored in 1,100-litre Eurobins and food waste in 240-litre wheeled bins. Internally, residents will be provided with segregated storage within their kitchen units.

9.117 Two residential waste stores will be located at ground level for residents to deposit their segregated waste.

9.118 On collection days, the LBH Refuse Collection Vehicle (RCV) will position itself on the kerbside of Eade Road, within 10m of each of the store access, secured by code or fob. Once the collection operatives have emptied the bins into the RCV, they will be returned to the residential waste stores.

9.119 A separate commercial waste store will be provided for the commercial tenants.

9.120 The Application is also accompanied by an Operational Waste Management Strategy which considers the potential impacts that may arise from waste generated during the operational phase of the Proposed Development, with the overall aim of developing a strategy for legislative compliance and good practice in the separation, storage and collection of waste arising.

9.121 In addition, vehicle swept path analysis has been undertaken, which demonstrates that all necessary vehicles can access, manoeuvre within and egress the Site (Appendix E of TA)

E4 Parking (car and cycle)

9.122 The proposed development is car free except for two Blue Badge car parking spaces. All existing car parking on the site will be removed.

9.123 The two Blue Badge bays will be provided on Eade Road adjacent to the site by converting existing on-street bays.

9.124 In addition, the TA confirms that discussions have been held with car club operators and as part of the wider Framework these discussions will be taken forward to provide car club spaces on the wider Site.

9.125 A total 101 long stay cycle parking spaces are provided (1 space per room), which accords with Sui generis requirement of table 10.2 of the London Plan (one space per C3 studio or one space per bedroom) and hence accords with the requirements set out in the Mayor's guidance for LSPBSL (Jan 2022).

9.126 In terms of short stay visitor parking 3 Sheffield stands will be provided in the public realm providing 6 short stay spaces. It is also envisaged that additional informal visitor parking will be possible within each of the warehouse living units.

9.127 In addition, four long stay spaces (within units) and 23 short stay spaces (12 Sheffield stands in the public realm) will be provided for the commercial units.

F. Energy and climate change

9.128 The NPPF states that plans should: *"take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures."* (Paragraph 153).

9.129 London Plan Policy SI2 sets out the Mayor of London's energy hierarchy: Use Less Energy ('Be Lean'); Supply Energy Efficiently ('Be Clean'); Use Renewable Energy ('Be Green') and monitor, verify and report on energy performance ('Be Seen'). It also sets a target for all development to achieve net zero carbon, by reducing CO2 emissions by a minimum of 35% on-site, of which at least 10% should be achieved through energy efficiency measures for residential.

9.130 London Plan Policy SI2 outlines that all major developments should be net zero carbon, and a detailed energy strategy should be provided with such proposals, so to demonstrate how the zero-carbon target will be met. This policy also sets out that a minimum on-site reduction of at least 35% beyond Building Regulations is required. London Plan Policy SI4 notes that major development proposals should demonstrate through an energy strategy how they will reduce the potential for internal overheating.

9.131 London Plan Policy SI4 calls for development to minimise overheating through careful design, layout, orientation, materials and incorporation of green infrastructure, designs must reduce overheating in line with the Cooling Hierarchy.

9.132 London Plan Policy SI5 calls for the use of planning conditions to minimise the use of mains water in line with the Operational Requirement of the Buildings Regulations (residential development) and achieve at least BREEAM 'Excellent' standard for 'Wat 01' water category or equivalent (commercial development).

9.133 London Plan Policy SI7 requires applications referable to the Mayor of London to submit a Circular Economy Statement demonstrating how it promotes a circular economy within the design and aim to be net zero waste.

9.134 Local Plan Policy SP4 requires all new developments to take measures that reduce energy use and carbon emissions. Sustainable design and construction techniques should be adopted, in line with Local Plan Policy SP11 and DPD Policy DM21.

9.135 Site Allocation SA34 notes that the wider site is identified as being in an area with potential for being part of a decentralised energy network and as such requires proposals to: *‘.....reference the Council’s latest decentralised energy masterplan regarding how to connect, and the site’s potential role in delivering a network within the local area’.*

9.136 Given the unique nature of the development i.e something that sits between commercial and residential it was decided to assess the development under the BREEAM New Construction (NC) 2018 scheme and to target a ‘Very Good’ rating as a minimum, with an aspiration to achieve ‘Excellent’.

9.137 The status of the proposed design at the time of planning application against the requirements of the targeted and potential credits is detailed in the pre-assessment scorecard attached in Appendix A of the Sustainability Assessment, which accompanies the Application.

9.138 In addition to the BREEAM assessment, the Application is accompanied by an Energy Statement, Sustainability Statement, and a Circular Economy Statement. All documents have been prepared by Expedition Engineering who have formed an integral part of the design team to ensure that environmental and sustainability considerations have been considered at all stages of the design development process.

9.139 These documents have been prepared in the context of the Framework document that accompanies the application, which embeds four principles for sustainable living that are intended to support the regeneration of the Harringay Warehouse District:

- Energy and Carbon.
- Materials and Circular Economy.
- Environmental Resilience.
- Wellbeing.

9.140 These principles and associated targets, together with adopted planning policy have helped to shape and inform the overall design approach of the proposals.

F1 Carbon reduction

9.141 The Energy Strategy sets out the proposed strategy for reducing the energy use of the development as well as utilising low carbon and renewable energy sources. The strategy confirms that the scheme has been designed in direct response to the guidance in the London Plan and the GLA ‘Sustainable Design and Construction Supplementary Guidance’ and in terms of energy, the proposals have been designed in accordance with the Mayor’s ‘Energy Hierarchy’ as follows:

Be Lean: energy efficient design

9.142 Compliance energy modelling has been undertaken to measure the effectiveness of passive and energy efficiency measures to inform the design. The following measures are proposed:

- Glazing size optimised to balance daylight availability and risk of overheating;
- G-value of 0.4 to all windows, with a light transmittance of 70%;
- Living/kitchen/dining rooms will be shaded via balconies, whilst bedrooms benefit from horizontal shading devices;
- All bedroom windows are also recessed, providing additional shading;
- Building envelope performance is significantly improved over Building Regulations Part L minimum standards;
- Air permeability will be no greater than 3m³/m².hr @ P50Pa, to limit heat loss and gain from air leakage;
- Ambient temperature heating distribution system to minimise heat losses within the distribution network;
- Use of mechanical ventilation with heat recovery (MVHR) with low specific fan powers and high heat recovery efficiencies;
- High efficiency lighting and lighting controls where relevant.

9.143 These measures cumulatively would result in a 27% carbon emissions reduction (compared to a Part L2 2021 compliant development) through passive and energy efficiency measures only, exceeding the minimum 15% required by the GLA.

Be Clean: heating infrastructure

9.144 Whilst there are no existing heat networks within proximity of the application site, it is located near the Woodberry Down opportunity area. Presently, Hackney Council, where the opportunity area is located, states that viability testing suggests that the area may be suitable for a heat network and further analysis at detailed feasibility stage will be carried out. As such, the development will be future proofed for connection to a district heating network.

9.145 A communal ambient loop heat network is proposed for the development. The network will comprise of roof mounted air source heat pumps providing water at ambient temperature to individual water source heat pumps located in each unit. These water source heat pumps will uplift the low-grade heat from the network and provide space heating and domestic hot water to each unit. With the decarbonisation of the grid, this technology offers the best long-term carbon emissions savings for the development.

Be Green: renewable energy

9.146 In addition to the communal and localised heat pumps, the buildings will benefit from 12kWp of roof-mounted photovoltaic panels, equivalent to 31no. 390W panels that will serve the landlord areas.

9.147 A total 53% carbon emissions reduction is achieved after demand reduction, energy efficient supply, and incorporation of renewable technologies, exceeding the minimum 35% required by the GLA.

9.148 The remaining regulated emissions will be offset through a cash in-lieu payment to the London Borough of Haringey offset fund. At the concept design stage this amounts to a total sum of £13,052, calculated based on a carbon price of £95 per tonne over 30 years.

Be Seen: monitor and optimise energy performance

9.149 The development will incorporate monitoring and metering in line with the GLA's Energy Monitoring Guidance (September/2021) to enable performance in use to be monitored and optimised. This will include the use of open protocol systems that allow devices to be connected without having to use proprietary systems.

F2 Overheating

9.150 The potential risk of overheating will be mitigated by incorporating passive and active design measures, in line with the London Plan Policy SI4, and the Cooling Hierarchy.

9.151 A CIBSE TM59 analysis has been undertaken for a sample of residential units considered 'worst-case' in terms of overheating. The preliminary assessment identified potential overheating risk within Living/ kitchen areas due, in part, to the excess solar gains to the south façade and increased internal gains associated with kitchen operations. Through an iterative process it was possible to develop a natural ventilation strategy for these rooms that limits operative temperatures to within the TM59 overheating criteria.

9.152 Openable windows also allow natural ventilation to bedrooms overnight, minimising the risk of bedrooms overheating during their occupied hours. As a result, night-time temperatures remain within the recommended ranges.

F3 Circular economy

9.153 The application is accompanied by a Circular Economy Statement, which is structured in accordance with the GLA guidance (2022).

9.154 It provides an overview of how the proposed development and sets a series of design measures and commitments to support a circular economy, in line with London Plan targets, including:

- Resource conservation – the design team will continuously review material efficiency strategies across design stages to ensure a lean design that reduces material quantities without inhibiting future flexibility. At RIBA Stage 2, the construction approach has been closely considered addressing material efficiency, flexibility and embodied carbon.
- Design for adaptability and flexibility – the design considers adaptability, flexibility and potential for expansion, with reference to and strategies focused on all six building layers: site, structure, skin, services, space and stuff.

- Design for disassembly – The proposals consider the (re)use of former shipping containers on the third smaller plot on the east of the site to create temporary structures which can be easily disassembled and erected elsewhere. Whilst Block A and Block B are designed for a longer lifespan, these still consider their eventual reconfiguration and deconstruction through principles to maximise the potential for high-value reuse of construction materials and elements at the end of the buildings' life.
- Climate change resilience – the development has considered the potential for increasingly severe weather events, in line with climate change projections, and responds to increased risks to overheating, flooding and water scarcity.
- Construction waste management - the development is targeting the diversion of 95% of construction, demolition and excavation waste from landfill. This will be achieved through management of demolition and excavation waste, as well as the production of a site waste management plan setting out the targets for efficiency and reuse/recycling of materials on- and off-site.

9.155 In pursuit of these targets the statement sets out a series of next steps to enable these targets to be met through the construction, operational and disassembly stages of the development.

G. Environment considerations

G1 Flood risk and drainage

9.156 London Plan Policy SI12, Local Plan Policy SP5 and DPD Policy DM23 all require development proposals to minimise, manage and reduce the risk of flooding. The site is within a Critical Drainage Area, and DPD Policy DM25 requires proposals in such areas to reduce the overall risk from flooding. In addition, development should ensure that surface water run-off is managed as close to its source as possible, in accordance with London Plan Policy SI13.

9.157 SA34 requires the submission of an FRA for any development advanced in the area and for applicants to consult with Thames Water.

9.158 The development site falls within Flood Zone 1 and is at low risk of flooding, with no mitigation required from a flood risk perspective. A Flood Risk Assessment has been prepared in support of the planning application. All forms of flood risk to and from the proposed development have been considered and the risk found to be low to very low.

9.159 The Application is also accompanied by a Surface Water Drainage Strategy. The surface water drainage system has been designed to collect surface water runoff within the site, mitigating any existing risk of surface water flooding. The discharge from the development will be restricted to 1.0l/s, a significant reduction from the existing discharge rates for the area. Attenuation storage is provided to accommodate all rainfall events up to and including the 1 in 100- year event plus 40% climate change allowance.

9.160 Sustainable Urban Drainage Systems (SuDS) will be incorporated and include green and blue roofs, permeable paving and rain gardens, which also offer the required levels of mitigation required for water quality.

9.161 Potable water demand will be minimised through best practice water-efficient sanitaryware, leak detection, metering and best practice irrigation of the landscape and communal green spaces. Drought resistant species will be prioritised and no significant permanent irrigation will be required for most planting.

9.162 Rain gardens are also being proposed to increase stormwater retention.

9.163 During construction measures will be taken to reduce water consumption on site, in accordance with best practice guidance from WRAP (The Waste and Resources Action Programme).

G2 Contamination

9.164 SA34 requires submissions to assess the risk of potential contamination prior to any development taking place.

9.165 In support of the policy requirement a phase 1 desk study report has been prepared. The report which is submitted in support of the application makes various recommendations in terms of the implementation stages of the project. It is envisaged that these further ground investigation works will be controlled by conditions attached to any future planning application.

G3 Ecology and biodiversity

9.166 London Plan Policy G6 and Local Plan Policy SP13 explain that proposals should manage impacts on biodiversity and aim to secure net biodiversity gain. In addition, proposals on sites which are, or are adjacent to, internationally designated sites, Sites of Special Scientific Interest, Local Nature Reserves, Sites of Importance for Nature Conservation or Ecological Corridors, should protect and enhance nature conservation value, in accordance with DPD Policy DM19.

9.167 The land is not designated for nature conservation. Internationally, nationally or locally designated wildlife sites would not be adversely impacted by the proposed development. The submitted Ecological Assessment outlines that no protected species would be harmed by the proposed works. The site is of low ecological value, and a significant biodiversity net gain (377.76%) can be achieved through implementing the measures identified in the Landscape Strategy.

9.168 It is envisaged that the final details of the ecological enhancements can be secured by way of an appropriately worded planning condition, subject to which the development will deliver a net gain in biodiversity.

9.169 London Plan Policy G5 outlines that major developments should contribute to the greening of London by including urban greening as a fundamental element of

the site and building design. The Mayor recommends that an urban greening factor of 0.3 should be achieved for commercial development and 0.4 for residential.

9.170 The submitted Planning Statement explains that the scheme would achieve an urban greening factor (UGF) of 0.35, which is considered appropriate given the hybrid nature of the use and the Site.

G4 Fire safety

9.171 London Plan Policy D12 requires new developments to achieve the highest standards of fire safety. To this effect, a Fire Statement should be provided with all major developments.

9.172 A Fire Statement and Gateway one statement, have been prepared in accordance with London Plan policy and are submitted in support of the application.

G5 Waste and recycling

9.173 London Plan Policies SI7 and SI8 indicate the Mayor's support for waste reduction, resource conservation, recycling and material re-use. In addition, Local Plan Policy SP6 and DPD Policy DM4 require development proposals to make suitable provision for waste storage and recycling storage, as well as collection.

Design out Construction, Demolition and Excavation Waste

9.174 Strategies to reduce waste arisings from site processes include:

- Developing a Site Waste Management Plan (SWMP).
- Setting targets for construction waste efficiency and diversion of resources from landfill in line with BREEAM and London Plan requirements.
- Opportunities to reuse as much of the demolition and excavation arisings from site as engineered fill within the development.
- Where possible off-site construction and Modern Methods of Construction will be used to mini- mise waste and lorry movements.
- Using reverse logistics and take back schemes to reduce packaging and vehicle movements.

Operational Waste

9.175 The focus during the operation of the proposed development will include:

- Employing the waste hierarchy,
- Developing waste management operations to segregate waste streams.
- Providing reuse and recycling deposit facilities.

9.176 Each shared kitchen area will incorporate sufficient internal waste storage containers to promote the separation of recyclable materials at the source. Residents in each block will deposit their segregated waste into clearly labelled bins within residential waste stores at ground level.

9.177 The application is accompanied by an Operational Waste Management Plan, which considers the potential impacts that may arise from waste generated during the operational phase of the Proposed Development, with the overall aim of developing a strategy for legislative compliance and good practice in the separation, storage, and collection of waste arising.

G6 Noise

9.178 A Noise Report has been provided in support of this application, and this includes a Noise Survey. Levels of noise at various points within, and adjacent to, the site have been measured through this Noise Survey. These measured noise levels allowed a robust glazing specification to be proposed which will provide internal noise levels for all residential spaces to meet the design range described within BS8233.

9.179 Measurement of road and underground from train activity indicates that vibration levels are below the threshold of human perception in accordance with BS6472: 2008. Re-radiated noise due to underground train pass-bys would be below the guidance criteria provided within 'Crossrail 2: A Technical Guide For Developers', ensuring that the effects of structure borne noise would not contribute to the overall noise levels experienced within the buildings.

9.180 Additionally the results of the noise survey have enabled criteria to be set for noise emissions.

9.181 A maximum noise emissions criterion for the proposed plant unit installations has been set based on the

requirements of London Borough of Haringey for new plant unit installations.

9.182 Further calculations would need to be undertaken once all M&E proposals are finalised in order to demonstrate compliance. It is envisaged that compliance with these criterion will be controlled by condition.

G7 Air quality

9.183 The NPPF states: *"planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas."* (Paragraph 186).

9.184 London Plan Policy SI 1 requires development proposals to not worsen air quality and be at least Air Quality Neutral and calls for large-scale EIA development to consider how local air quality could be improved. The London Plan is supported by the Construction Dust SPG.

9.185 The application is accompanied by an air quality statement, which confirms that based on dispersion modelling undertaken in support of the Statement that annual mean pollutant concentrations across the application site are below the relevant air quality objectives at proposed sensitive locations. The site is therefore considered suitable for proposed end use without the implementation of protective mitigation techniques.

9.186 The level of anticipated traffic generation from the site concluded that impacts on existing pollutant levels as a result of operational phase pollutant emissions are predicted to be not significant in accordance with relevant screening criteria.

9.187 The London Plan states that new developments must be considered Air Quality Neutral. Pollutant emissions associated with anticipated traffic flows were compared to relevant benchmarks. Following assessment, annual pollutant transport emissions were predicted below the development specific benchmarks. Subsequently, the Proposed Development is considered Air Quality Neutral.

9.188 Based on the assessment results presented in the Statement the site is considered suitable for the proposed end use and it therefore complies with Development Plan policy.

H. Section 106

9.189 The NPPF states that decision makers should consider how otherwise unacceptable forms of development could be made acceptable through the use of condition or planning obligations. As a corollary to this, the Framework sets out the statutory tests which require such obligations to be:

1. Necessary to make the development acceptable in planning terms;
2. Directly related to the development; and
3. Fairly and reasonably related in scale and kind to the development.

9.190 London Plan Policy DF1 requires development proposals to provide the infrastructure and meet other policy requirements necessary to ensure that they are sustainable and support delivery of the London Plan. Where it is demonstrated that planning obligations cannot viably be supported, applicants and decision-makers should first prioritise affordable housing and necessary public transport improvements and the importance of affordable workspace and culture and leisure facilities in delivering good growth.

9.191 Following on from this policy context the application proposals, the Applicant acknowledges that Planning Obligations will be needed to mitigate adverse impacts that might otherwise arise from the development, deliver policy objectives, deliver a package of benefits for the local community and to secure various delivery mechanisms for the project.

9.192 It is expected that planning obligations will be required in relation to the following matters:

- 1) Employment Initiative – participation and financial contribution towards local employment and training:
 - a. Provision of a named Employment Initiatives Co-Ordinator;
 - b. Notify the Council of any on-site vacancies;
 - c. 20% of the on-site workforce to be Haringey residents;
 - d. 5% of the on-site workforce to be Haringey resident trainees;
 - e. Provide apprenticeships at one per £3m development cost (max.
 - f. 10% of total staff); and
 - g. Provide a support fee of £1,500 per apprenticeship towards recruitment costs.
- 2) Sustainable Transport Initiatives:
 - a. Implementation of travel plan and monitoring of travel plan contribution of £3,000 per year for a period of 3 years;
- 3) Carbon Mitigation:
 - a. Provision of a contribution to offset the carbon emissions of the development where not met on site against the zero-carbon target. Estimate of the carbon offset figure is £13,052 for the whole development which is to be reviewed once the amended energy statement has been reviewed by the Council
 - b. Ensure the scheme is designed to take heat supply from the proposed DEN (including submission of DEN Feasibility Study)
 - c. Design of secondary and (on-site) primary DHN in accordance with LBH Generic Specification and approval of details at design, construction, and commissioning stages.

- d. Use all reasonable endeavours to negotiate a supply and connection agreement with the DHN within a 10-year window from the date of a planning permission.
 - e. Deferred carbon offset (it not connecting to the DEN).
 - f. Implementation of low-carbon heating supply if not connecting to the DEN replacing the temporary heat solution
 - g. 'Be Seen' Commitment to providing energy Data
 - h. Solar PV monitoring
- 4) BREEAM
- a. BREEAM assessment monitoring milestones.
- 5) Management Plan (Public realm).
- 6) Management Plan (Building)
- 7) Maintaining affordability of rents
- 8) Design and delivery of the alleyway
- 9) Monitoring Contributions

9.193 In addition Section 278 agreements will need to be entered into in relation to the works to the publicly owned part of the alleyway and works to Tewkesbury Road.

9.194 The Application proposals will also be subject to Mayorial CIL. Accompanying this application is a completed version of the form titled 'Determining whether a Development may be CIL Liable: Planning Application Additional Information Requirement Form'.

■ 10. Summary & Conclusions

10.1 This Planning Statement has provided a comprehensive assessment of the proposals against Development Plan policy and has demonstrated that the proposals will deliver a high-quality building, which either meets or exceeds the design, environmental and quality of life standards set for new living and working accommodation.

10.2 The proposals have been subject to in-depth consultation with existing residents and have been guided through the advice of officers and the QRP. They have also been subject to detailed testing in terms of their impact on the amenity of existing development, their impact on existing transport infrastructure and their environmental impacts and where necessary appropriate mitigation measures have been provided or proposed.

10.3 The proposals will deliver a unique new living and working building typology, which will remain affordable for new and existing warehouse living residents. It fulfils the aspirations and requirements set by the Council's own policies for new warehouse living and hence they should be approved without delay.

10.4 The Applicant and design team look forward to discussing the proposals in more depth with officers.

Appendix 1

Issue	Warehouse District Framework Document (Standards)	Source:	Seven Sisters/ Eade Road Planning Application
Overall- the key ingredients	All new and existing spaces should seek to: ■ Provide low carbon, affordable and reliable energy to occupants. ■ Support sustainable transport and mobility. ■ Apply circular economy principles to minimise waste. Use low carbon materials that are responsibly and ethically sourced. ■ Deliver a mix of dedicated/ non-dedicated workspaces. ■ Deliver or have access to a variety of large and small external 'yard' spaces for relaxing and working ■ Deliver voluminous space, which create opportunities for vertical adaptation. ■ Deliver dedicated storage space. ■ Design for a comfortable microclimate. ■ Target emerging policy on overheating, daylight and sunlight standards. ■ Reduce surface water run-off. ■ Provide a net gain in biodiversity.	Based on discussions with residents in terms of the key ingredients of Warehouse Living and current environmental planning policy	Energy and Carbon: The buildings have been designed to reduce their energy demand and consumption. An ambient loop system will provide low carbon heat, and renewable energy will be maximised through the implementation of PV panels. The strategy enables the development to exceed the relevant GLA carbon reduction targets. Whole life carbon impacts have been assessed at RIBA Stage 2 and measures to optimise construction product consumption efficiency and the selection of products with a low environmental impact will ensure a reduction in embodied carbon, whilst sustainable travel is supported through design. Car free development Provision of dedicated long stay and short stay cycle parking Environmental Resilience: New planting is introduced to reduce surface water runoff and help minimise the urban heat island effect, overheating risk within living spaces has been minimise through the provision of shading devices and high performance glazing specification. SuDS will be incorporated and include green and blue roofs, permeable paving and rain gardens to ensure run-off rates achieve greenfield levels as well as run-off water quality. Materials and Circular Economy: By embracing circular economy principles, the development will minimise the use of virgin materials, specify the use of low carbon and renewable materials, as well as prioritise locally sourced options. Waste arisings reduction will also be targeted through construction and operation, with site waste management and operational waste management plans being provided to lead the strategy.

Issue	Warehouse District Framework Document (Standards)	Source:	Seven Sisters/ Eade Road Planning Application
			Health & Wellbeing: The development provides ample access to daylight and views out, promoting positive impacts on both mood and productivity. Air and noise pollution will be minimised during construction, and adequate indoor conditions will also be achieved in all habitable spaces. Delivery of a mix of dedicated and non-dedicated workspaces Delivery flexible spaces suitable for residents' adaptation Delivery of voluminous double height space, creating opportunities to insert bed decks. Delivery of living environments that are well lit and well insulated. Delivery of new high quality shared communal space, green /blue roofs, shared communal growing space, opportunities for planting and high quality, safe/ secure public realm.
Bedroom No.	Based on survey of existing spaces units contain between 4-15 bed units	Based on analysis of wider warehouse district	13 units: 3 x 14 bed 1 x 12 bed 3 x 6 beds 5 x 5 beds 1 x 4 beds
Bedroom Size (no kitchen in room)	Average bed size: A minimum floor area of 7.5sqm (1-bed) and 11.5sqm (2-bed).	Housing Design Quality & Standards (Mayor of London)	All bedroom meet or exceed these standards and all floor to ceiling heights are 3.5m, creating the opportunity to introduce a platform bedspaces.
Bedroom – access to sunlight / daylight	All bedrooms to have access to natural light and direct sunlight and be provided with an adequate level of visual and acoustic privacy.	Development Plan: Amenity Standards	All rooms are provided with natural light and have openable windows in line with the required standards.
Bedroom dimensions	Raised ceiling capable of accommodating platform bed, as far as is possible.	Characteristic/ key ingredient of Warehouse Living bed spaces, as defined through consultation	All bedrooms are 3.5m in height providing opportunity to introduce a platform bed.

Issue	Warehouse District Framework Document (Standards)	Source:	Seven Sisters/ Eade Road Planning Application
Kitchen (dimensions)	■ Kitchen= 1.1 sqm per person ■ Kitchen size and layout must enable occupants to safely use the kitchen and to store, prepare and cook food in a safe and hygienic way. ■ Accommodate a table sufficient to enable all residents to eat communally i.e., 12 residents = table with seating for 12	HMO Standards Ability to eat communally: A key characteristic/ ingredient of Warehouse Living, as defined through consultation	Kitchens: Average 1.3 sqm per person Communal double height shared space. Dining table sufficient to sit the maximum number of residents.
Kitchen layout	All floor surfaces must be reasonably smooth and impervious and capable of being cleansed. All corners and wall/ floor junctions must be properly sealed	HMO standards	Subject to fit out- - but intention will be to fit out to HMO standards
Kitchen equipment	A sink and drainer of adequate size and set on a stable base must be provided for every five occupants that share the kitchen. Each sink shall be provided with an adequate supply of cold and constant hot water and must be properly connected to the mains drainage system. An electric full-sized cooker with four burners/ hobs, an oven and a grill to be provided for every five occupants. (A microwave may be substituted for up to 2 burners). 2x double electrical sockets, plus one additional socket for each major appliance for every five occupants. 2x double electrical sockets must be positioned in the food preparation area, at worktop level and in a safe position. Worktop (minimum 2000mm x 600mm) for every 5 occupants, securely fixed and made of smooth impervious material (Tiled splashback provided).	HMO standards	Subject to fit out- but intention will be to fit out to HMO standards

Issue	Warehouse District Framework Document (Standards)	Source:	Seven Sisters/ Eade Road Planning Application
	Dry storage of minimum capacity 0.15m³ (500x 600 x 500mm) per occupant. A refrigerator with a freezer compartment (or where no freezer compartment, provide a separate freezer) for every 5 occupants within the property.		
Laundry facilities	Adequate laundry and drying facilities should be provided for residents. These should be in a convenient and ventilated location and not interfere with other communal spaces that are used for cooking, dining, recreation and socialising. Laundry and drying facilities should be for the use of residents and should not also be used by the management company for washing bedding and linen. At least one washer and one dryer should be provided for every 10 residents. Additional secure and naturally ventilated space, adequate for intended number of users, should also be available for air drying clothes.	(*) Source: GLA, London Plan Guidance, Large Scale Purpose-built Shared Living	Laundry and drying facilities to be provided in line with Framework standards.
Living room/ workspace	Flexible living and workspace – ■ Living space (1-3 people: 8.5 sqm and 4-6 people: 11 sqm) ■ Workspace (as part of living space or separate) BUT in addition to Living Space ■ Workspace / retail space: per building in ground floors	HMO standards Provision of space to work, as part of communal areas or separate identified as a key ingredient/ characteristic of Warehouse Living, as defined through consultation.	Communal double height shared space: see floorplans Provision of dedicated separate workspace at lower floors/ containers. Plus, shared workspace as part of shared space.

Issue	Warehouse District Framework Document (Standards)	Source:	Seven Sisters/ Eade Road Planning Application
Bathroom/ shower room/ toilets (layout)	Within an enclosed room, which is provided with appropriate wall and surface finishes. All bathrooms and toilets must be suitably heated, lighted and ventilated. All baths, showers and wash basins must be fitted with taps and supplied with a cold and constant supply of hot water and properly connected to the mains drainage system. All wash hand basins and baths must be provided with two course tiled splashback and shower cubicles fully tiled or be complete self-standing.	HMO Standards	Shared bathrooms on all floors meet HMO standards.
Bathroom/ Shower room (dimensions)	Baths: 1600mm x 700mm Shower rooms/ cubicles 800 x 800mm Wash basin 500 x 400mm	HMO Standards	See floorplans
Bathroom equipment	Where five or more occupants sharing bathroom and toilet facilities, there must be at least one fixed bath or shower for every five occupants and at least one toilet separate to the bathroom for every five occupants.	HMO Standards	See floorplans
Circulation space (corridors, stairs, lifts, lift lobbies)	Access controlled, welcoming, well lit. Lifts capable of carrying heavy equipment.	Based on consultation with residents.	See floorplans
Communal external space	External space in the form of shared walkways/ ground floor yard space/ roof terraces – some covered space to enable outside working. 1sqm per resident. At least 40sqm per building (*)	(*) Source: GLA, London Plan Guidance, Large Scale Purpose-built Shared Living	Block A: 182.4sqm (balconies) Block B: 30.1sqm Roof terrace/ garden: 102sqm Total area 314.5sqm Based on a maximum occupancy of 133 people means that each resident will have access to 2.36sqm of private amenity space. The development also provides new public realm for use by existing and new residents and the wider community.

Issue	Warehouse District Framework Document (Standards)	Source:	Seven Sisters/ Eade Road Planning Application
DDA (Disabled)	10% of units to be accessible Part M of Building Regs compatible	Part M of Building Regs Development Plan Policy	Standard access provisions in all warehouse units will be designed to comply with M4 (2). 11 units contain M4 (3) bedrooms and 1 accessible bathroom per unit.
Cycle Parking	Required as per London Plan Policy T5 Cycling, Table 10.2 Use Class: Sui generis (*)	(*) Source: GLA, London Plan Guidance, Large Scale Purpose-built Shared Living	Long stay warehouse living : 1space per bedroom (64 spaces in secure cycle store in Block B, 16 spaces in Cara Yard, 21 spaces in units). Commercial space: 23 spaces, plus space in units
Car	Car-free as per London Plan Policy T6.1(E) Residential parking (*)	(*) Source: GLA, London Plan Guidance, Large Scale Purpose-built Shared Living	Car free development.
Waste	Dedicated communal bin storage areas for each warehouse (both new and existing)	Council standards.	Dedicated communal bin store provided, which is of sufficient size to accommodate the needs of the development.
Heating (fixed)	All units of accommodation must be equipped with adequate means of space heating, which is capable of maintaining a temp of 21C when the outside temp is 1C. Heating should be under the control of the occupants and should be safe, efficient and affordable.	HMO Standards	Energy efficiency: All fabric elements will be upgraded to current Part L standards or beyond. The M&E strategy will include MVHR and an air source heat pump to provide space heating and hot water. Please refer to sustainability statement and design stage SAP calculations for further detail. Space heating will be centrally controlled with the use of underfloor heating within the units The development represents a significant improvement overall to beyond Part L requirement. Cooling strategy: All habitable rooms in the proposal have opening windows. Solar shading is proposed to areas of glazing on the south facing façade to reduce heat gains in summer and allow them in winter. Green roofs: Green/ blue roofs are proposed to Block A and B.

Issue	Warehouse District Framework Document (Standards)	Source:	Seven Sisters/ Eade Road Planning Application
Ventilation	All kitchen areas must be properly ventilated to the external air either by an operable window or suitable mechanical ventilation system.	HMO Standards	The building has been designed to be mechanically ventilated with closed loop heat recovery. Operable windows have also been provided to ensure users have a low energy solution to adapting their local environment if they chose.
Lighting	All kitchen areas must be provided with adequate lighting, particularly over the cooking and food preparation areas.	HMO Standards	Kitchen will be provided with lighting in accordance with HMO standards
Noise	Building regs: Part E		All windows double glazed and meet Building Regs Part E
Energy & Carbon	Plot a pathway to net-zero carbon including energy in use, embodied carbon and lifestyle emissions.	Derived from Development Plan	See Sustainability and Energy Statements
Materials & Circular Economy	Reuse existing buildings and materials. Design principles for future proofing and flexibility. Reduce upfront and lifecycle material impacts in accordance with GLA guidance.	Derived from Development Plan	See Circular Economy Statement
Environmental Resilience	Ensure long term resilience for the development in terms of utilities provision, flood risk, designing for sustainable urban water management and identifying ways to achieve significant net biodiversity gain. Achieve greenfield run-off rates. Minimise water use with low flow fittings and metering. Target an Urban Greening Factor of 0.35 Target 10-20% biodiversity net gain.	Derived from Development Plan	BNG:377.76 % Greenfield runoff rate. Low flow fittings and metering. UGF:0.35
Wellbeing	Design for a comfortable microclimate. Target emerging policy on overheating, daylight and sunlight standards.		See Sustainability Statement
Fire Safety	Building Regs Part B		Designed to meet Building Regs.

