

## 30-36 Clarendon Road, Off Hornsey Park Road

Local Planning Authority: Haringey

Local Planning Authority reference: HGY/2022/3846

### Strategic planning application stage 1 referral

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008.

### The proposal

Demolition of the existing buildings and construction of a building up to 11-storeys (plus basement) to provide 51 residential units and 560 sq.m. of commercial floorspace with access, parking and landscaping.

### The applicant

The applicant is **Paul Simon Magic Group** and the architect is **Stockwool**.

### Strategic issues summary

**Land use principles:** The redevelopment of this allocated site within the Wood Green Growth Area would contribute to the continued regeneration of this Strategic Area for Regeneration and is supported in line with London Plan Policies H1, E2, SD10 and Objectives GG1 and GG2.

**Affordable housing:** The scheme is proposing 36% affordable housing by habitable room, comprised of 60% affordable rent and 40% intermediate tenure. Confirmation of the affordable rent levels and the intermediate product is required, and an early stage viability review secured.

**Heritage & urban design:** Broadly supported and the proposal complies with Policy D9B and may accord with the qualitative assessment criteria set out at Policy D9C; and no harm would be caused to any nearby heritage assets.

**Transport:** Car-free nature of the proposal is supported and the improvements identified in the Active Travel Zone assessment should be secured via a Section 278 agreement; the amount of commercial cycle parking should be increased and all cycle parking designed to meet LCDS standards; and, various transport-related plans to be secured.

Other issues on the **energy strategy, WLC, circular economy, water, air quality, urban greening** and **biodiversity** also require resolution prior to the Mayor's decision making stage.

### Recommendation

That Haringey Council be advised that the application does not yet comply with the London Plan for the reasons set out in paragraph 52. Possible remedies set out in this report could address these deficiencies.

## Context

1. On 25 January 2023 the Mayor of London received documents from Haringey Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008, the Mayor must provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.
2. The application is referable under the following category of the Schedule to the Order 2008:
  - **Category 1C:** *"Development which comprises or includes the erection of a building of (c) more than 30 metres high and is outside the City of London."*
3. Once Haringey Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or, allow the Council to determine it itself.
4. The Mayor of London's statement on this case will be made available on the GLA's public register: <https://planning.london.gov.uk/pr/s/>.

## Site description

5. The application site is approximately 0.08 hectares and is bound by Clarendon Road to the north, east and west and the Clarendon Recovery College to the south. Located within a Strategic Area for Regeneration in the London Plan and the Haringey Heartlands section of the Wood Green Growth Area, the application site forms part of Site Allocation SA23 – Clarendon Road South and Draft site allocation WGSA27 in the Wood Green Area Action Plan. The application site is also within the boundaries of the emerging Wood Green Opportunity Area.
6. The nearest part of the Strategic Road Network (SRN) is the A105, Green Lanes approximately 550 metres to the east of the site.
7. A 1970's 2-storey industrial unit containing approximately 595 sq.m. of employment floorspace, with nine car parking spaces, currently occupies the site. The ground floor is in use as a temporary nursery and the upper floor is in use for office and storage for the Jessica Buttons factory. The site, however, is neither designated as Strategic Industrial Land (SIL) nor a Locally Significant Industrial Site (LSIS).
8. Although not within a conservation area or occupied by any listed buildings, there are a number of heritage assets in proximity of the site including the statutory listed Grade II\* Church of St John The Baptist and the Grade II Turnpike Lane Underground station, Alexandra Palace Park and Garden, and 69 and 71 High Street. Locally listed heritage assets such as numbers 31, 62 and 120 High Street are also in proximity.
9. There are two bus stops located approximately 80 metres south of the site on Turnpike Lane serving the 144,41, N41 and N91 routes. The closest station is Hornsey Station located approximately 300 metres south which serves Great

Northern rail services. Turnpike Lane underground station is also approximately 570 metres east, which serves the Piccadilly line. The site therefore has a public transport accessibility level (PTAL) of 5 on a scale from 0 to 6b where 0 is the lowest and 6b is the highest. The proposed Quietway 10 cycleway extends along Cross Lane, 500 metres to the west.

## **Details of this proposal**

8. The applicant, Paul Simon Magic Group, is seeking full planning permission for the redevelopment of the site involving the demolition of the existing building and construction of an 11-storey building to provide 51 new residential units and 560 sq.m. of commercial floorspace.

## **Case history**

9. The applicant requested a high-level pre-application meeting with the GLA in July 2020 to discuss the redevelopment of the current application site along with two adjoining properties forming part of the wider site allocation—Clarendon Recovery College (in use as a day centre) and the West Indian Cultural Centre. The application proposed a new state of the art African Caribbean Cultural centre, 100 residential units, a co-living space (100 rooms), gym and co-working space. It is understood that this master planned approach for the delivery of the three sites has not materialised due to land ownership issues.

## **Strategic planning issues and relevant policies and guidance**

10. For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area comprises the Local Plan: Development Management DPD (2017); Local Plan: Site Allocations (2017); Local Plan: Strategic Policies 2013 (with alterations 2017); Local Plan: Tottenham Area Action Plan DPD (2017); and, the London Plan 2021.
11. The following are also relevant material considerations:
  - The National Planning Policy Framework and National Planning Practice Guidance;
  - National Design Guide;
  - Draft New Local Plan, November 2020; and,
  - Draft Wood Green Area Action Plan Regulation 18 Preferred Option Consultation Draft February 2018.
12. The relevant issues, corresponding strategic policies and guidance (supplementary planning guidance (SPG) and London Plan guidance (LPG)), are as follows:
  - Good growth *London Plan;*
  - Economic development *London Plan; the Mayor's Economic Development Strategy; Employment Action Plan;*
  - Employment land *London Plan;*

- Housing *London Plan; Housing SPG; the Mayor's Housing Strategy; Play and Informal Recreation SPG; Character and Context SPG; Housing Design Standards draft LPG;*
- Affordable housing *London Plan; Housing SPG; Affordable Housing and Viability SPG; the Mayor's Housing Strategy;*
- Office *London Plan;*
- Retail *London Plan;*
- Fire Safety *London Plan; Fire Safety draft LPG;*
- Urban design *London Plan; Character and Context SPG; Public London Charter LPG; Housing SPG; Play and Informal Recreation SPG; Housing Design Standards draft LPG; Optimising Site Capacity: A Design-led Approach draft LPG; Fire Safety draft LPG;*
- Inclusive access *London Plan; Accessible London: achieving an inclusive environment SPG; Public London Charter LPG;*
- Sustainable Development *London Plan; Circular Economy Statements LPG; Whole-life Carbon Assessments LPG; 'Be Seen' Energy Monitoring Guidance LPG; Urban Greening Factor LPG; Mayor's Environment Strategy;*
- Transport and parking *London Plan; the Mayor's Transport Strategy; Sustainable Transport, Walking and Cycling draft LPG.*
- Air quality *London Plan; the Mayor's Environment Strategy; Control of dust and emissions during construction and demolition SPG; Air Quality Neutral LPG; Air Quality Positive LPG;*
- Ambient noise *London Plan; London Environment Strategy;*
- Green infrastructure *London Plan; the Mayor's Environment Strategy; Preparing Borough Tree and Woodland Strategies SPG; All London Green Grid SPG; Urban Greening Factor LPG;*

13. On 24 May 2021 a Written Ministerial Statement (WMS) was published in relation to First Homes. To the extent that it is relevant to this particular application, the WMS has been taken into account by the Mayor as a material consideration when considering this report and the officer's recommendation. Further information on the WMS and guidance in relation to how the GLA expect local planning authorities to take the WMS into account in decision making can be found [here](#).

### **Land use principles**

14. Good Growth Objective GG2 of the London Plan promotes the optimisation of land, particularly through the redevelopment of brownfield sites, as a key part of the strategy for delivering additional homes in London.
15. The site is brownfield land falling within an area designated as a Strategic Area for Regeneration in the London Plan; and London Plan Policy SD10

emphasises the importance of the renewal of such designated areas to tackling spatial inequality. The application site also falls within Wood Green Growth Area and is part of Clarendon Road South site allocation in both the adopted Local Plan and the draft Wood Green Area Action Plan (WGAAP). It is identified for an employment-led mixed use development with an indicative capacity of 206 residential units and 5,390 sq.m. of employment floorspace in the Local Plan, and 201 and 8,435 sq.m. respectively in the draft WGAAP. Regarding the type of employment floorspace expected, the Local Plan does not provide any specifics; but the draft WGAAP notes that this should be a studio or SME office space.

#### Loss of industrial capacity

16. Although not designated as SIL or LSIS, given that the site contains an industrial building it is considered a non-designated industrial site for the purposes of London Plan Policy E4B. London Plan Policy E7C sets out three stand alone circumstances under which mixed-use or residential developments on non-designated industrial sites should be supported. One of the three instances where support should be provided is on sites that have been allocated in an adopted local development plan document for residential or mixed-use development.
17. As mentioned above, the site forms part of a wider site allocation in the adopted Local Plan and therefore the proposed redevelopment of the site accords with Policy E7C. Furthermore, it is understood that the proposed 560 sq.m. of commercial space would be used for predominantly workspace, office or retail use and marketed to local businesses. The provision of workspace and small office spaces is in keeping with the requirements of the site allocation and is also supported in line with London Plan Policy E2. The retail use is also acceptable as this would widen the scope for jobs and skills set; hence contributing aid in positively addressing spatial inequality and economic and social deprivation. In view of the site's location within a Strategic Area for Regeneration, the Council should seek to secure affordable workspace in line with London Plan Policy E3, as well an employment strategy to engender local employment and skills training as promoted in Policy SD10, Policy E11 and Good Growth Objective GG1.

#### Housing delivery

18. Policy H1 of the London Plan, in seeking to increase the supply of housing in London, sets borough housing targets and allocates to the London Borough of Haringey a target of 15,920 for the period 2019/20 to 2028/29. The scheme is proposing 51 new residential units, which would contribute to the above target and is therefore supported.

#### Conclusion on land use

19. In conclusion, the redevelopment of this allocated site within the Wood Green Growth Area would contribute to the continued regeneration of this Strategic Area for Regeneration and is supported in line with London Plan Policies H1, E2, H1, SD10 and Objectives GG1 and GG2.

## Housing

20. The application is proposing 51 new homes, as set out in Table 1 below, which is supported. The applicant is encouraged to engage with the Council on the unit mix.

**Table 1: Proposed housing mix**

| Tenure          | Studio   | 1Bed      | 2Bed      | 3Bed     | Units     | Units by %  | Habitable Rooms | Habitable Rooms by % |
|-----------------|----------|-----------|-----------|----------|-----------|-------------|-----------------|----------------------|
| Affordable Rent | -        | 5         | 2         | 3        | 10        | 31%         | 28              | 36%                  |
| Intermediate    | -        | -         | 5         | 1        | 6         |             | 19              |                      |
| Market          | 3        | 14        | 18        | -        | 35        | 69%         | 85              | 64%                  |
| <b>Total</b>    | <b>3</b> | <b>19</b> | <b>25</b> | <b>4</b> | <b>51</b> | <b>100%</b> | <b>132</b>      | <b>100%</b>          |

### Affordable housing

21. Policy H4 of the London Plan seeks to maximise the delivery of affordable housing, with the Mayor setting a strategic target of 50%. Policy H5 of the London Plan and the Mayor's Affordable Housing and Viability SPG set out a 'threshold approach', whereby schemes meeting or exceeding a specific percentage of affordable housing by habitable room, without public subsidy, and other criteria such as tenure mix are eligible for the Fast Track Route (FTR). Such applications are not required to submit viability information to the GLA and are also exempted from a late stage review mechanism.
22. On privately owned industrial land (as is the case here) where there is no net loss of industrial capacity, a minimum of 35% affordable housing by habitable room, without public subsidy, must be provided to be eligible for the Fast Track Route. In instances involving net loss of industrial capacity, a minimum of 50% affordable housing by habitable room (without public subsidy) and other criteria such as tenure mix must be met to qualify.
23. Appropriate tenure splits should be determined through the Development Plan process or by supplementary planning guidance. In this case, Haringey Local Plan sets a strategic target to achieve 60% of affordable housing as affordable rent (including social rent) and 40% as intermediate based on habitable rooms. The scheme is proposing 36% affordable housing by habitable room, comprised of 60% affordable rent and 40% intermediate tenure.
24. The applicant is advised that the proposed affordable rented units must be secured as or compare favourably with the Mayor's London Affordable Rent levels to be considered genuinely affordable. With regard to the intermediate units, the Mayor's preferred products are London Shared Ownership and London Living Rent and these should be provided in line with the household income cap set out in the London Plan and the Mayor's Affordable Homes Programme Fund. A range of rents at income caps below the £90,000 cap for London Shared Ownership (£60,000 for London Living Rent) should be secured

for the first three months of marketing in line with paragraphs 4.6.9 and 4.6.10 of London Plan Policy H6.

25. Ordinarily, as indicated at paragraph 22, a minimum of 50% affordable housing is required to qualify for the FTR where there is a net loss of industrial capacity. It is, however, acknowledged that the proposal responds to the requirements of the Local Plan site allocation in terms of the types of employment space proposed and also includes a small number of residential units (for delivery in a single phase). Therefore, subject to the affordable units being appropriately secured in line with the above requirements, the Council's acceptance of the unit mix and the application meeting all other relevant policy requirements, only an early stage viability review will need to be secured.
26. GLA officers also strongly advise proactive and early engagement on the wording of the draft S106 agreement prior to any Stage II referral being made, to ensure the wording is effective and aligns with policy requirements.

## **Heritage and urban design**

### **Heritage**

27. London Plan Policy HC1 states that proposals affecting heritage assets, and their settings should conserve their significance, avoid harm, and identify enhancement opportunities. The NPPF states that when considering the impact of the proposal on the significance of a heritage asset, great weight should be given to the asset's conservation and the more important the asset, the greater the weight should be. Policy HC1 relates to all heritage assets, including non-designated heritage assets. The NPPF states that in weighing applications that affect non-designated heritage assets, a balanced judgement is required having regard to the scale of any harm or loss and the significance of the heritage asset.
28. As stated earlier in this report, the Grade II\* listed Church of St John The Baptist and the Grade II listed Turnpike Lane Underground station; Alexandra Palace Park and Garden; and 69 and 71 High Street are in proximity of the site. GLA officers, however, consider that the proposed development would not cause harm to the significance of these heritage assets in view of its physical and visual separation from the application site and the various interposing developments. The application therefore complies with London Plan Policy HC1.

### **Urban design**

29. Chapter 3 of the London Plan sets out key urban design principles to guide development in London. Design policies in this chapter seek to ensure that development optimises site capacity; is of an appropriate form and scale; responds to local character; achieves the highest standards of architecture, sustainability and inclusive design; enhances the public realm; provides for green infrastructure; and respects the historic environment.
30. The scheme has been subject to an independent design review, having been presented to the borough's Quality Review Panel. This accords with London Plan Policy D4 and is welcomed. The Design and Access Statement submitted with the application outlines changes to the design in response to matters raised during this exercise. This is welcomed.

31. As the proposed number of units per hectare exceeds 350, a management plan detailing long-term maintenance implications, as detailed in paragraph 3.4.9 of Policy D4 will be required. This should be secured by condition.

Layout and public realm

32. The east facing and north-east corner frontages are well activated with the commercial spaces well situated. The shared entrance for all residential tenures is welcomed. The ground floor layout would benefit from more activation to the north-west corner and west facing frontage. The chamfered corner is quite prominent and should be considered for the location of the shared entrance. This would also distribute street level activation better around the base of the building.
33. The interaction of the proposed building's ground floor layout with the future phase building layout to the south should be considered carefully at the time that development comes forward.
34. The provision of new street trees and rain gardens is welcomed. It is noted these are beyond the development boundary. The LPA should ensure that new public realm paving is provided in a way that fully integrates it with the external finishes beyond the site, rather than following ownership boundaries.

Tall buildings, scale and massing

35. With a building over 10 storeys, the proposed development represents a tall building as defined by London Plan Policy D9A and paragraph 6.1.16 under Local Plan Policy SP11. Overall, the approach to height and massing distribution across the site is supported, with a downward transition in height in response to the ground plus 2-storey properties along Hornsey Park Road.
36. Notwithstanding the above, London Plan Policy D9B states that tall buildings should only be developed in locations identified as potentially suitable in development plans, and at D9C sets out a criterion against which tall buildings should be assessed. The criterion focuses on visual, functional, environmental and cumulative impacts.
37. Regarding Policy D9B, the site falls within the Wood Green Growth Area, which the Local Plan identifies as 'may be suitable' for tall buildings. This potential suitability is reiterated in the draft WGAAP, however, no specific building heights are indicated. An assessment against Policy D9C is therefore required to determine the site's suitability for the proposed tall building and this is set out below.

*Visual impact*

38. The development would appear in long range views as part of the emerging cluster of tall buildings along Clarendon Road. The variation in height, stepped massing and crown would make a positive contribution to the emerging skyline. In mid-range views the building would aid in wayfinding and legibility, with the tallest element of the building landmarking the point where the two branches of Clarendon Road intersect. Additionally, the building's materiality blends well with the townscape given the prevalence of brick in the existing and emerging context. With respect to immediate views, the ground floor is proposed to be well animated ensuring a direct relationship with Clarendon Road; and the height and design of the base would also relate well to the

nearby residential properties on Hornsey Park Road. Widened pavements, the introduction of tree planting and the overall improvement of the public realm are also going to help maintain a pedestrian scale.

39. No harm would be caused to the significance of any heritage assets or equally to the composition of any protected views. Given the approach to design and materials, no adverse impact from solar glare is expected. A high-quality standard of architecture is emerging, and the material palette aligns with the existing and emerging context. It is expected that the Council will secure a lighting strategy to ensure any light spill is appropriately mitigated.

#### *Functional impact*

40. With respect to functional impact, the building will be equipped with a suitably sized fire evacuation lift and two staircases to safeguard the safety of future occupants. In addition, parking, deliveries and servicing have been considered in the design and plans to monitor/manage these activities will be secured to ensure the building functions without causing disturbance or inconvenience to the public realm. Separate clearly defined entrances for the commercial and residential components are proposed at different points across the site, which along with the small number of homes, should prevent overcrowding.
41. The application site has a public transport accessibility level (PTAL) of 5 and the scheme promotes cycling with the inclusion of cycle parking into the scheme's design. Any potential impact on aviation, navigation and telecommunication interference should be addressed prior to the Mayor's final determination of the application.
42. With the delivery of new housing (including 36% affordable units) and replacement employment floorspace, the proposed redevelopment of the site should contribute positively to the continued regeneration of this London Plan designated Strategic Area for Regeneration. The proposal therefore does not raise any adverse functional impacts.

#### *Environmental impact*

43. In terms of the environmental impacts, the application is accompanied by a wind microclimate assessment, daylight and sunlight assessment and an acoustic assessment. As the Local Planning Authority, Haringey Council will undertake a full review of the environmental impacts as part of their assessment of the proposal and GLA officers will work with the Council to ensure that any necessary changes or environmental mitigation measures are appropriately secured prior to the Mayor's final determination.

#### *Cumulative impact*

44. Cumulatively, the proposed development would form part of an emerging cluster of tall buildings along Clarendon Road in the Haringey Heartlands locale and would contribute to its nascent diverse and hierarchical skyline. The proposal would also contribute to an enhanced streetscape, with improved active frontages, greening and pavements. The proposal therefore does not raise any significant adverse cumulative, functional and environmental impacts at this time.

### *Conclusion on Tall buildings*

45. In conclusion, the proposal complies with Part B of Policy D9 as it is located in an area identified as potentially suitable in the development plan for tall buildings; and, the development may accord with the qualitative assessment criteria set out in Part C of Policy D9 subject to the satisfactory resolution of the outstanding impacts raised through the provision of further information and/or imposition of conditions to secure mitigation measures. Officers will draw a conclusion in relation to compliance with Policy D9 when the application is referred back to the Mayor at Stage II.

### Residential quality

8. All units would meet the London Plan and Mayor's Housing SPG internal space standards. In addition, each unit would have access to its own private amenity space in the form of terraces or balconies. Communal amenity spaces are also proposed at roof level across the development. Efficient cores, with a maximum of six units per core, are proposed; and of the total number of units, 69% would be dual aspect with no single aspect north-facing units. However, it should be noted that the applicant is including homes in this figure that will be impacted by a future phase proposal of up to 8 storeys (indicative in masterplan). Therefore, as currently indicated, when this future phase comes forward the majority of homes in this stack will no longer be meaningfully dual aspect as both aspects will be looking on to the same recessed balcony only. The LPA should ensure that as the future phase design comes forward, the residential quality of this development is not compromised. The applicant should confirm whether the floor to ceiling height of the units will be at least 2.5 metres.
9. In accordance with Policy S4 of the London Plan, development proposals that include housing should provide play space for children based on the short and long-term needs of the expected child population generated by the scheme. The total play space required, using the GLA's 2019 child play space calculator, is 189 sq.m. Of this total, 153 sq.m. is required for children 11 years and under, and the application proposes to provide this amount on-site at roof level. The proposed play elements appear to be diverse; and the spaces would allow for passive surveillance and be accessible by all households regardless of tenure. The Council should ensure that the highest standards of inclusiveness design and safety are secured for these spaces. With respect to play space for children 12 years and over, the application identifies a number of existing off-site play facilities in the vicinity of the application site. The Council will determine whether these spaces are suitable in terms of their accessibility and play elements and apply seek any applicable financial contributions.

### Architectural quality

10. The proposed materials palette is supported. The architectural appearance with richer detailing at the base where it will be experienced in close proximity at street level, and then variation of detailing within a common language through the middle and top of the building is appropriate. The proposal for decorative louvred doors to plant areas at ground floor level is positive to enhance their appearance.

### Fire safety

11. A fire statement prepared by suitably qualified personnel at Mu.Studio has been submitted with the application and it includes a declaration of compliance stating that “[t]he technical content produced for this planning application is considered to suitably comply with the relevant legislation and requirements of London Plan Policies D5(B5), D12A and D12B, subject to suitable development and implementation during the Building Regulations process, construction, and occupation.”
12. An evacuation lift is proposed as required by London Plan Policy D5. With respect to D12, the strategy adequately responds to the six criteria outlined under Policy D12(B). As the proposed building is over 30 metres in height, the design of the building was amended to include two staircases subsequent to the preparation of the fire statement.

### Inclusive access

13. The proposal responds positively to London Plan Policy D7 and meets Building Regulation requirement M4 (2) ‘accessible and adaptable dwellings’ and Building Regulation requirement M4 (3) ‘wheelchair user dwellings’. In line with London Plan Policy D5, the private and communal amenity spaces and approaches and entrances to the buildings have been inclusively designed. This is welcomed.

## **Transport**

### Healthy Streets and Active Travel Zone Assessment

14. The Mayor’s Healthy Streets approach is central to delivering good growth in London and enabling people to travel by walking, cycling and public transport. It is expected that all streets and public realm within and around the site will be designed in line with this approach. This will aid in achieving the outcomes of the Mayor’s Transport Strategy relating to healthy streets and healthy people, a good public transport experience, and delivery of good growth.
15. The Active Travel Zone assessment identifies the need for maintenance and footpath repaving improvements to encourage walking, pedestrian safety and access to all. These improvements should be secured by the Council. These improvements should be secured by the Council via a Section 278 agreement.

### Buses

16. TfL is developing plans in conjunction with Haringey to expand the local network to improve access to the greater Haringey Heartlands development. This includes a proposal to run a bus route on Clarendon Road to Mary Neuner Road. As such, the applicant will need to ensure that Clarendon Road is accessible and suitable for two-way bus operation based on 12-metre electric double decker buses.

### Parking

17. The proposed number of residential cycle parking is in line with London Plan Policy standards—93 long-stay and 3 short-stay spaces. The provision of 5% of the total number as accessible Sheffield stands is welcomed.

18. Currently only 12 short-stay spaces are proposed for the commercial element, which is not in line with London Plan policy and should be increased to 4 long-stay and 28 short-stay spaces given the potential for various uses within Use Class E.
19. All cycle parking should be designed in line with the London Cycling Design Standards, with access to the various cycle stores clearly shown on plans. This should be secured by condition.
20. The car-free nature of the scheme, apart from 2 residential disabled parking bays, is supported in line with London Plan Policy T6.1. The applicant should also provide 1 additional disabled parking bay for the commercial element in line with London Plan Policy T6.5. GLA officers are supportive of there being a permit-free agreement to prevent future residents obtaining a parking permit.

#### Transport-related plans

21. A full construction logistics plan should be secured by condition in line with London Plan Policy T7 and discharged in consultation with TfL prior to commencement. The full plan should detail all logistics and construction proposals to ensure that pedestrian and cyclist movement and safety and bus operations are maintained throughout construction. This will support sustainable travel in line with London Plan policies and the Mayor's Vision Zero goal to eliminate deaths and serious injuries from London's transport networks by 2041 and ensure compliance with London Plan policy T4(F).
22. A full delivery and servicing plan should also be provided and secured by condition in line with London Plan Policy T7. Deliveries and servicing should be arranged to occur outside of peak times.
23. An outline residential travel plan has been submitted. Funding for the implementation and monitoring of a full travel plan should be secured in the Section 106 agreement in line with London Plan Policies T1 and T4(B).

### **Sustainable development & Environmental issues**

24. Unless otherwise stated, full technical responses under each policy area set out below have been provided to the Council and applicant.

#### **Energy strategy**

25. The London Plan requires all major developments to meet a net-zero carbon target. Reductions in carbon emissions beyond Part L of the 2013 Building Regulations should be met on-site. Only where it is clearly demonstrated that the zero-carbon target cannot be fully achieved on-site a contribution to a carbon offset fund or reductions provided off site can be considered.

#### Energy strategy compliance

26. An energy statement has been submitted with the application. The energy statement does not yet comply with London Plan Policies SI2, SI3 and SI4. The applicant is required to further refine the energy strategy and submit further information to fully comply with London Plan requirements. Full details have been provided to the Council and applicant in a technical memo that should be responded to in full; however, outstanding policy requirements include:

- Be Lean – updates to modelling for the non-domestic element;
- Be Clean – demonstration the load connected to the communal network is maximised;
- Be Green – demonstration that renewable energy has been maximised, including roof layouts showing the extent of PV provision and details of the proposed air source heat pumps;
- Be Seen – confirmation of compliance with this element of policy, with compliance to be secured within the S106 agreement;
- Energy infrastructure – further details on the design of district heating network connection is required, and the future connection to this network must be secured by condition or obligation;
- Managing heat risk – further details to demonstrate the cooling hierarchy has been followed.

### Carbon savings

27. For the domestic element, the development is estimated to achieve a 71% reduction in CO<sub>2</sub> emissions compared to 2013 Building Regulations. For the non-domestic element, a 57% reduction is expected.

### **Whole Life-cycle Carbon**

28. In accordance with London Plan Policy SI2 the applicant is required to calculate and reduce whole life-cycle carbon (WLC) emissions to fully capture the development's carbon footprint.
29. The applicant has submitted a whole life-cycle carbon assessment. The WLC assessment does not yet comply with London Plan Policy SI2. The WLC report appears to cover much of the assessment requirements; however, an Excel version of the GLA WLC template must be submitted to allow a full review to be completed against the guidance.
30. A condition should be secured requiring the applicant to submit a post-construction assessment to report on the development's actual WLC emissions. The template and suggested condition wording are available on the GLA [website](#)<sup>1</sup>.

### **Circular Economy**

31. London Plan Policy D3 requires development proposals to integrate circular economy principles as part of the design process. London Plan Policy SI7 requires development applications that are referable to the Mayor of London to submit a Circular Economy Statement, following the Circular Economy Statements LPG.
32. The applicant has submitted a Circular Economy Statement in accordance with the GLA guidance. However, at the time the statement was reviewed by GLA officers the completed GLA CE template, which is required to undertake a

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<sup>1</sup> <https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance/whole-life-cycle-carbon-assessments-guidance>

thorough assessment, had not been submitted. The template was recently provided and detailed comments will be sent to the applicant and LPA in due course.

33. A condition should be secured requiring the applicant to submit a post-construction report. The template and suggested condition wording are available on the GLA [website](#)<sup>2</sup>.

### **Digital connectivity**

34. A planning condition should be secured requiring the submission of detailed plans demonstrating the provision of sufficient ducting space for full fibre connectivity infrastructure within the development in line with London Plan Policy SI6.

### **Urban greening**

35. The proposed development presents a well-considered approach to integrating green infrastructure and urban greening across the masterplan. This includes the incorporation of rain gardens and biodiverse roofing which supports multifunctionality, in accordance with Policy G1 of the London Plan. The opportunity for the provision of biosolar roofing should be explored.
36. There appears to be existing greening to the south-east of the site, the applicant should consider creating a more considered green link into this network. As the site boundaries front onto the public highway, the applicant should further consider greening of the public realm. The future phasing plans within the Landscape Strategy should also further demonstrate green links and integration into London's wider green infrastructure network.
37. The applicant has calculated the Urban Greening Factor (UGF) score of the proposed development as 0.43, which exceeds the target set by Policy G5 of the London Plan. This should be treated as a minimum and any improvements to the quality and quantity of urban greening made where possible.
38. London Plan Guidance on Fire Safety restricts the use of combustible materials, limiting the use of green walls where they form part of the external wall of a building. The proposed urban greening should therefore be reviewed against this guidance and updated as appropriate. Where this review finds it necessary to remove a green wall, opportunities should be sought to make up any reduction in the UGF by improving the quality or quantity of greening across the wider masterplan. For further information on combustible materials see: <https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance/fire-safety-lpg>

### **Sustainable drainage and flood risk**

#### **Flood Risk Management**

39. The site is in Flood Zone 1 and is within a Critical Drainage Area (CDA). A Flood Risk Assessment (FRA) has been submitted as required under the National Planning Policy Framework (NPPF). The FRA, however, needs to demonstrate that flood risk will not be displaced/increase elsewhere due to the

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<sup>2</sup> <https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance/circular-economy-statement-guidance>

development. It should be demonstrated that any flooding up to the 100-year plus 40%CC should be safely contained within site and that any excess flood water is not displaced off site. Moreover, considering the development includes a basement, further information on the groundwater flood risk to the site needs to be provided than the information provided in the council SFRA. The FRA provided for the proposed development therefore does not comply with London Plan Policy SI12.

#### Sustainable drainage

40. The surface water drainage strategy for the proposed development does not comply with London Plan Policy SI13.
41. The proposed discharge rate should be reduced as close as possible to the QBAR greenfield rate, the proposed impermeable area used to avoid overestimation and pumping avoided. In addition, the proposed areas of permeable paving need to be shown on the drainage plan and a robust justification for the absence of rainwater harvesting provided.
42. Finally, the FRA should demonstrate that flood risk will not be displaced/increase elsewhere due to the development, hydraulic calculations should be provided (including a range of return periods and storm durations) and permeable paving included in the maintenance plan.

#### Water efficiency

43. The Sustainability Statement notes that the proposed dwellings will target a maximum indoor water consumption of 105 l/person/day, in line with the optional standard in Part G of the Building Regulations. For the non-residential element, 3 Wat 01 credits are targeted, with water consumption reduced by 40%. This complies with London Plan Policy SI5. Water efficient fittings are proposed, which is welcomed; but water meters and a leak detection system should also be proposed as well as water harvesting and reuse to reduce consumption of water across the site.

#### **Air quality**

44. London Plan Policy SI1 requires applications to be accompanied by an air quality assessment, which demonstrates how the development would not lead to further deterioration of existing poor air quality, create any new areas that exceed air quality limits (or delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits) or create unacceptable risk of high levels of exposure to poor air quality.
45. The application is accompanied by an air quality assessment and the development would be air quality neutral. However, further clarification particularly in relation to the operational phase exposure assessment is required.

#### **Biodiversity**

46. London Plan Policy G6 states that proposals that create new or improved habitats that result in positive gains for biodiversity should be considered positively. Policy G6 further states that development proposals should aim to secure net biodiversity gain. Trading rules should also be satisfied.

47. The applicant should provide quantitative evidence that the proposed development secures a net biodiversity gain in accordance with Policy G6(D). If biodiversity net gain is not achievable on the site, the applicant should review opportunities for biodiversity offsetting in consultation with the borough.
48. Recommendations in the Preliminary Ecological Assessment should be implemented, or robust justification should be given as to why they cannot be. The applicant should prepare an Ecological Management Plan (EMP) to support long-term maintenance and habitat creation. The EMP should be secured by planning condition and approved if the proposed development is granted planning consent.

### **Local planning authority's position**

49. In due course the Council will formally consider the application at a planning committee meeting.

### **Legal considerations**

50. Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged; or, direct the Council under Article 6 of the Order to refuse the application; or, issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application (and any connected application). There is no obligation at this stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

### **Financial considerations**

51. There are no financial considerations at this stage.

### **Conclusion**

52. London Plan policies on industrial land, strategic and local regeneration, skills and opportunities for all, housing, affordable housing, urban design, heritage, transport, sustainable development and environmental issues are relevant to this application. Whilst the proposal is supported in principle, the application does not fully comply with these policies, as summarised below:
  - **Land Use Principles:** The redevelopment of this allocated site within the Wood Green Growth Area would contribute to the continued regeneration of this Strategic Area for Regeneration and is supported in line with London Plan Policies H1, SD10 and Objectives GG1 and GG2.
  - **Affordable housing:** The scheme is proposing 36% affordable housing by habitable room, comprised of 60% affordable rent and 40% intermediate

tenure. Confirmation of the affordable rent levels and the intermediate product is required, and an early stage viability review secured.

- **Heritage and urban design:** Broadly supported and the proposal complies with Policy D9B and may accord with the qualitative assessment criteria set out at Policy D9C; and no harm would be caused to any nearby heritage assets.
- **Transport:** Car-free nature of the proposal is supported and the improvements identified in the Active Travel Zone assessment should be secured via a Section 278 agreement; the amount of commercial cycle parking should be increased and all cycle parking designed to meet LCDS standards; and, various transport-related plans to be secured.
- **Sustainable development & Environmental issues:** The development is estimated to achieve a 71% and 57% reduction in CO<sub>2</sub> emissions compared to 2013 Building Regulations for the domestic and non-domestic elements respectively; further information is required on the energy strategy as well WLC, circular economy, water, air quality, urban greening and biodiversity.

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