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Planning Statement

The Printworks, 819-
829 High Road,
Tottenham

AUGUST 2023

Q220855

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1 Introduction

- 1.1 This Planning Statement supports an application for full planning and Listed Building Consent (LBC) submitted on behalf of 'Goodsyard Tottenham Limited' ("the Applicant").
- 1.2 Consent is sought for the redevelopment of 819-829 High Road and land to the rear ("the Site") for purpose-built student accommodation (PBSA) and supporting commercial uses.
- 1.3 The Site, also known as 'The Printworks', forms part of Site Allocation NT5 (High Road West) and is an important interface between the High Road frontage to the east and the future development phases of NT5 to the west. The allocation will provide a new residential and leisure development for London through its comprehensive regeneration.
- 1.4 The Applicant controls additional land within Site Allocation NT5 to the west of the Site, known as the Goods Yard and The Depot. These sites benefit from an extant planning permission for 867 new homes and 2,040sqm of commercial space (ref. HGY/2021/1771), alongside a more recent resolution to grant secured in July 2023 for a revised (but very similar form of) development providing 844 new homes and 2,068sqm of commercial uses (ref. HGY/2022/0563).
- 1.5 The Printworks, the Goods Yard and The Depot are all within the Applicant's control and collectively will deliver a significant part of the High Road West regeneration envisaged by Site Allocation NT5. This is in addition to the wider regeneration benefits in Tottenham already delivered by the Application, including the new Tottenham Hotspur Stadium and wider Northumberland Development Project (NDP), and the restoration of several historically significant buildings.
- 1.6 The Printworks will deliver significant economic, social and environmental benefits including:
 - Responding to Haringey's acute housing needs, which is of particular importance given Haringey's lack of five year housing land supply. The London Plan confirms that student accommodation will contribute towards meeting housing need.
 - Creating a new, high-quality entranceway to Brunswick Square that opens views into a well-designed and active streetscape. Coupled with the creation of a high-quality, accessible and secure public realm along Brunswick Square, this represents a significant improvement to the existing alleyway which is unattractive and unsafe.
 - Achieving a better townscape legibility and integration of the Site within the wider site allocation.
 - Making a meaningful contribution to the wider regeneration objectives for North Tottenham and Site Allocation NT5.
 - Attracting new investment and visitors to North Tottenham. Annual spending by workers and student residents could be in the region of £1.3m, significantly boosting the local economy.
 - The creation of new employment opportunities during the construction and operational phases, with opportunities for local recruitment and skills development.

- Acting as a catalyst for investment and further regeneration of Site Allocation NT5 and the wider area, redressing inequality and halting further decline in Tottenham without prejudicing other development in the vicinity.
- Securing the long-term future of the Grade II listed 819-821 High Road and the locally listed buildings at 823-827 High Road.
- Integrating the statutorily and locally listed buildings at 819-827 High Road within the development, better revealing their significance in the process and enhancing their overall appearance and setting within the Conservation Area.
- Complementing the ongoing regeneration of Tottenham that has taken place to the east, notably within the NDP and Northumberland Terrace.

1.7 The remainder of this Planning Statement comprises the following:

- Section 2 outlines the relevant planning background, including the site description, planning designations and planning history.
- Section 3 describes the pre-application consultation that has been undertaken.
- Section 4 summarises the proposed development.
- Section 5 sets out the relevant planning policy context.
- Section 6 explains the comprehensiveness of the proposals.
- Section 7 considers the relevant planning considerations.
- Section 8 provides details of planning obligations and Community Infrastructure Levy (CIL).
- Section 9 summarises the conclusions.

2 Relevant Planning Background

The Site

- 2.1 The Site forms part of a terrace of late 19th/early 20th century buildings along the west of High Road, Tottenham. It lies opposite and adjacent to the North Tottenham High Road Local Shopping Centre.
- 2.2 The Site comprises Nos. 819-829 High Road which range from two to four storeys in height and have a direct frontage to the High Road. To their rear, the properties comprise a range of rear extensions and hard surfacing that is used informally for car parking, with this area being generally of a poor quality and unattractive in appearance.
- 2.3 The north of the Site is bound by Brunswick Square, a narrow shared access road which extends along the Site boundary and provides access to the Peacock Industrial Estate to the west and north-west of the Site. To the south lies Nos. 813-817 High Road, beyond which is Percival Court.
- 2.4 Percival Court does not provide through access in its current form but is used by the existing properties to its north and south. It connects with the rear of the Site in its south-west corner.
- 2.5 819-821 High Road is Grade II listed with the remaining High Road properties being locally listed. The eastern part of the Site, including the High Road properties, lies within the North Tottenham High Road Conservation Area. The west (rear) of the Site is not within this designation.
- 2.6 819-821 High Road is occupied by 'La Royale Banqueting Suite', a commercial private-hire events venue and business. The Banqueting Suite provides rooms and events space that are available to hire for private events, including conferences, corporate/charity events, weddings and private parties.
- 2.7 The Banqueting Suite comprise two principal parts – the first being the listed High Road property itself, and the second being an unlisted rear extension which extends to the western boundary of the Site.
- 2.8 The remaining occupiers at ground floor comprise a nail bar (Nos. 823/825) and a bridal shop (Nos. 827/829). At upper levels the High Road properties comprise 13 residential flats which are all occupied on short term assured shorthold tenancies.
- 2.9 The Site comprises a mix of PTAL 4 and 5¹, being immediately adjacent to local bus routes on the High Road, and c. 260m from White Hart Lane Overground Station to the south-west, c.

¹ <https://tfl.gov.uk/info-for/urban-planning-and-construction/planning-with-webcat/webcat?Input=N17+8ER&PlaceHolderText=eg.+NW1+6XE+or+530273%2C+179613&scenario=Base+Year&type=Ptal&zoomLevel=15>

1km from Northumberland Park railway station to the east, and c. 1km from Silver Street Overground Station to the north.

The Surroundings

- 2.10 Surrounding the Site, the largest development in the area is the Northumberland Development Project² (NDP) which comprises the new THFC stadium on the eastern side of the High Road. In addition to the stadium, the NDP development has already delivered a new supermarket, offices (Lilywhite House) and the London Academy of Excellence. Once completed, the NDP development will provide additional residential, hotel, sports centre, community and health uses.
- 2.11 The NDP includes consented development of significant scale, with the tallest residential tower to the south of the stadium permitted to be up to 36 storeys. The Club have also delivered the first phase of the 'Northumberland Terrace' regeneration to the immediate north-west of the stadium (broadly opposite the Site) with consent in place for the subsequent phase for a new Cultural Quarter.
- 2.12 This demonstrates the Club's commitment to delivering high quality development and being a catalyst for positive regeneration in the area.
- 2.13 West of the Site, the Applicant has secured full planning consent at appeal for the comprehensive regeneration of two significant sites within the High Road West (NT5) allocation, known as the Goods Yard and The Depot. These proposals would deliver a residential-led, mixed-use development of 867 new homes and 2,040sqm supporting commercial uses (ref. HGY/2021/1771). A major new public park (c. 1,995sqm) would be provided within The Depot, positioned to the north-west of the Printworks site.
- 2.14 In July 2023, the Applicant secured a resolution to grant planning permission for a modified version of the scheme at the Goods Yard and the Depot (HGY/2022/0563) which principally responds to update fire safety requirements and the introduction of a second staircore to the tall buildings. The development is very similar to the appeal scheme providing 844 new homes and 2,068sqm of commercial uses.
- 2.15 Collectively, the Printworks, the Goods Yard and The Depot are all within the Applicant's control and form a significant part of the High Road West 'NT5' allocation to the north of White Hart Lane.
- 2.16 The area surrounding the Site has therefore been, and will continue to be, subject to significant investment and transformation.
- 2.17 In addition to the proposed new public park within The Depot, there are a considerable number of green spaces, open spaces and sports facilities within the local area. This includes Tottenham Cemetery Gardens, the Florence Hayes Recreation Ground, Bruce Castle Park, Bull Lane Sports Pitches and Harlington Park, amongst others.

² Approved under planning permission HGY/2015/3000.

Relevant Planning History and the Extant Scheme

- 2.18 The Site benefits from an extant planning permission and LBC granted in August 2022 (refs. HGY/2021/2283 & HGY/2021/2284) for the redevelopment of the Site for the 72 residential homes, a cinema and supporting commercial uses. The development includes the following:
- Retention and adaptation of the High Road properties at Nos. 819-827 High Road.
 - Demolition of existing buildings and structures to the rear of 819-829 High Road.
 - The demolition of 829 High Road and creation of a widened, high-quality and accessible public realm.
 - Internal and external alterations to 819/821 High Road (Grade II), including reinstatement of hipped roof, demolition works to the rear, façade and related external works, internal alterations and associated works
 - Redevelopment of the Site for a residential-led, mixed use development comprising 72 residential units (C3), flexible commercial, business and service uses (Class E), and a cinema (Sui Generis).
 - Delivery of on-site private and public amenity/open space
 - Associated parking (primarily at basement) and hard/soft landscaping.
- 2.19 The heights consented by the above increased further from the High Road, being two-storey on the High Road frontage to a maximum of 6-storeys in the north-west corner. The remainder of the scheme was at lower heights, notably 5 storeys in the south-west corner, 4 storeys along the western boundary between these corner blocks, and 2/3 storeys to the rear of the High Road properties.
- 2.20 In August 2021, the Council and their development partner (Lend Lease) secured a hybrid planning consent for the entirety of Site Allocation NT5 which could deliver up to 2,869 new homes, commercial uses and public realm (ref. HGY/2021/3175). This consent includes the Printworks, the Goods Yard and The Depot sites, with these shown in outline form only and informed by broad development parameters relating to height, scale, massing and use, amongst others.
- 2.21 The Lend Lease consent is fully compatible with the Applicant's separate proposals for the Printworks, Goods Yard and The Depot and neither scenario would prejudice delivery of the other. This was confirmed by the Council in granting the various consents. It remains the Applicant's current intention to deliver the Printworks, Goods Yard and The Depot themselves therefore, alongside Lend Lease's delivery of the remainder of NT5.
- 2.22 Aside from the above, there is limited recent planning history to the Site. Of note to this Statement:
- The use of No. 819-829 as a commercial "Banqueting Suite" was granted planning permission in November 1992³ (No. 819 High Road) and February 1994⁴ (No. 821 High

³ Ref. HGY/1992/1059.

⁴ Ref. HGY/1993/0497.

Road). Most recently, this building was granted permission for a two-storey extension at ground and first floor in December 2005⁵.

- A flexible change of use was granted under the Prior Approval process⁶ at No. 823 High Road in October 2017. This changed the use of this property from office to a vape/e-cigarette shop on a temporary basis until October 2019.

2.23 To the south of the Site at 807 High Road, full planning permission was granted in September 2021 for the redevelopment for 9 residential units alongside supporting retail, office and dentist use (ref. HGY/2021/0441). This scheme would utilise Percival Court for its secondary access.

Track Record

2.24 The Applicant is part of Tottenham Hotspur Football Club's ("the Club") corporate group structure. The Club has been based in Tottenham during its entire 139-year history and has substantial landholdings which it has gradually been bringing forward to further the area's regeneration.

2.25 The Applicant therefore has a strong track record of delivering projects that contribute to Haringey's wider regeneration objectives, respecting and restoring the heritage significance of parts of the North Tottenham Conservation Area, and representing a significant level of investment to achieve local transformational change. Not only is the Club the major private investor in the area, but it is the principal economic driver and the highest profile cultural institution in the borough.

2.26 Notably, this includes the award-winning new stadium and surrounding NDP scheme, parts of which are still to be delivered. The Club has been clear that its desire is to build much more than just a stadium and collectively the NDP is the primary regeneration drive in the area which is intended to act as a catalyst for further regeneration to its west within the HRW area, including the Site.

2.27 The Club have also successfully restored the Grade II* listed Percy House (796 High Road) to house the Tottenham Hotspur Foundation providing an exemplar example of heritage regeneration in this part of Tottenham, alongside the restoration of the Grade II listed Warmington House (744 High Road) which was removed from Historic England's Heritage at Risk register following the Club's interventions.

2.28 At 500 White Hart Lane, the Club successfully delivered a residential-led scheme of 145 new homes (including 29 affordable homes) alongside supporting employment floorspace. Prior to this, they also delivered Berland Court (ref. HGY/2008/2220) which included 34 new affordable homes.

2.29 Immediately north-west of the stadium at Nos. 790-814 High Road, the Applicant has adopted a comprehensive approach to the repair and restoration of the historic 'Northumberland Terrace'.

⁵ Ref. HGY/2005/1997.

⁶ Ref. HGY/2017/2925.

- 2.30 The first phase of this regeneration – the Paxton development⁷ – has been constructed and is now operational, providing the immediate interface between the stadium and the Northumberland Terrace, and comprising a new multi-functional building for ticket sales, retail and administrative uses alongside a high-quality public realm. Phase 2 restored the external envelope of Nos. 790-794 High Road, removing poor quality rear extensions to better reveal the heritage significance of the buildings.
- 2.31 The Applicant will continue to deliver the remaining regeneration phases of the Northumberland Terrace. Phase 3 was approved by the LBH in April 2021⁸, proposing a new ‘Cultural Quarter’ alongside restoration of the listed properties at Nos. 798-814 High Road and land to their rear (east). The final phase (Phase 4) is still being developed but will comprise the renovation of Nos. 790 (Grade II*), 792 (Grade II) and 794 (Grade II) High Road. Planning permission and LBC have been secured in respect of 792-794 to enable occupation by the Sarabande Foundation, a learning arts and cultural organisation and creative business accelerator (refs. HGY/2022/1658 & HGY/2022/1659).
- 2.32 Collectively, the above schemes have (and will continue to) transform the area and represent a significant investment by the Applicant into Tottenham. To date, this has included over 2,800 new jobs (FTE); the London Academy of Excellence Tottenham, which is the Sunday Times Schools Guide 2021 Sixth Form College of the Year; Brook House Primary School, which is now Ofsted ‘Good’ and heavily oversubscribed; bringing the NFL to Tottenham; a new leisure and recreational attraction with the ‘SkyWalk’ visitor experience; and c. 400 new homes, including 285 affordable, with planning permission secured for a further 1,230 homes.

⁷ Approved under planning and LBC references HGY/2016/3310 & HGY/2016/3540 (as amended).

⁸ HGY/2020/1584 & HGY/2020/1586, approved 9 April 2021.

3 Pre-Application Engagement (including Statement of Community Involvement)

- 3.1 The Site benefits from an extant planning and LBC for its redevelopment. The enclosed proposals retain the overarching design principles in so far as possible, working closely with the established building parameters (including consented heights and footprints) and approach to external appearance.
- 3.2 The enclosed proposed are intended as a continued design evolution of the extant scheme, therefore, rather than something fundamentally new. The principle changes relate to the use, with the cinema being removed and an alternative form of residential accommodation now proposed (student).
- 3.3 The extant proposals were subject to a considerable level of community and stakeholder engagement, with the scheme evolving in response to these. Full details are outlined within the submission documents to the extant scheme (refs. HGY/2021/2283 & HGY/2021/2284), including explaining how the scheme was amended to achieve the position approved by LBH. In summary, this engagement comprised:
- Seven pre-application meetings with LBH Officers (including planning, design and heritage).
 - Two presentations to Quality Review Panel (QRP).
 - Discussions with Historic England.
 - Online public consultation website.
 - Two virtual webinars with the local community.
 - Engagement with local businesses and the community through regular Business and Community Liaison Group (BCLG) meetings.
 - Engagement with Mr David Lammy (MP for Tottenham).
 - Engagement with representatives of the Peacock Industrial Estate and Network Rail.
 - Presentation to LBH Planning Sub-Committee and Development Management Forum.
- 3.4 Given the evolution of the scheme from the extant consents and the retention of the overarching design principles and approach, the above engagement remains entirely relevant to the enclosed application.
- 3.5 To support this previous engagement, the Applicant has presented the revised proposals to the BCLG on 15th August 2023 with the presentation subsequently circulated to those who attended alongside the wider BCLG Group. The presentation was positively received.
- 3.6 In addition, two pre-application meetings were held with LBH Planning, Design and Heritage Officers on 10th November 2022 and 12th July 2023. During the first meeting, Officers raised comments relating to the following:
- Provision of commercial units to the corners would be welcomed.

- Ground floor frontages to the High Road frontage should be activated.
- The size and configuration of the central courtyard should be reconsidered to avoid being “pinched”.
- The outlook from units to the western edge should be reconsidered.
- Concern of a modest increase to the fifth floor massing on the western elevation, albeit beneath the maximum height consented.
- Queried whether 829 High Road still requires demolition.

3.7 The above queries were addressed through a modified scheme, as appropriate, which was presented to Officers at the second pre-application meeting on 12th July 2023. Overall, feedback was positive, and Officers confirmed that their previous comments had been addressed.

4 Proposed Development

- 4.1 The proposals will regenerate the Site through a PBSA-led development in accordance with the principles of Site Allocation NT5. In summary, they comprise the following components:
- Retention of the High Road properties at Nos. 819-827 High Road.
 - Demolition of existing buildings and structures to the rear of 819-829 High Road.
 - The demolition of 829 High Road and creation of a widened, high-quality and accessible public realm.
 - Internal and external alterations to 819/821 High Road (Grade II), including reinstatement of hipped roof, demolition works to the rear, façade and related external works, internal alterations and associated works.
 - Redevelopment of the Site for PBSA development and supporting commercial spaces.
 - Delivery of on-site private and public amenity and open space.
 - Associated car/cycle parking and landscaping works.
- 4.2 The proposals are summarised below to be read alongside the Design and Access Statement.
- 4.3 Full planning permission is sought for the proposals. A related LBC is sought for internal and external alterations to 819/821 High Road (Grade II).

Student Accommodation

- 4.4 Consent is sought for 287 student bedspaces (Sui Generis). The proposals include 276 student bedspaces within the new build element, comprising 222 cluster beds and 54 studios. The upper levels of the High Road properties would provide 11 student bedspaces, comprising 9 cluster beds and 2 studios.
- 4.5 A flexible approach to the upper levels of the High Road properties is proposed, with the potential use of these 11 student bedspaces for student/University-related services which would be ancillary to the overall Sui Generis student use. No change to the proposed internal layouts would be required in either scenario, and these units would not function independently of the PBSA use as an integral part of this student operation.
- 4.6 Cluster units would include shared kitchen/living/dining space, equating to 4.33sqm per cluster room.
- 4.7 On-site affordable student accommodation would be provided at 35% (100 units)). This would be dispersed throughout the development to ensure no “poor doors”. All affordable accommodation would be equal in design, quality, size and occupancy level to the standard student rooms, with rental levels set in line with London Plan requirements for the full 38-week academic year (being equal to or below 55% of the maximum income that a new full-time student studying in London and living away from home could receive from the Government’s maintenance loan for living costs for that academic year).

4.8 29 student units would be accessible units, equating to 10% of the total 287 units proposed.

Commercial

4.9 Four flexible commercial units (Class E) are proposed within the development. These are located in the four corners of the scheme at ground floor level and total 238sqm (GEA).

Scale, Height & Massing

4.10 The proposals retain the scale, height and massing principles established by the extant planning consent. They comprise two interconnected urban blocks that will extend from two storeys (including ground) at its High Road frontage to a maximum 6 storeys at the north-west corner, with the remainder of the development being at lower heights – notably 5 storeys in the southwest corner, 4 storeys along the western boundary between these corner blocks, and 2/3 storeys rising from the rear of the High Road properties.

4.11 The scale and massing respond directly to the scale of existing buildings fronting the High Road but also the emerging regeneration to the west through the Goods Yard and The Depot sites, which are identified as locations for suitable tall buildings. As explained further in the DAS, the Site's location within the Conservation Area and the corresponding principles within the HRWMF have informed the scheme design from the very outset of the design development process.

4.12 819, 821 and 823-827 High Road will be refurbished and reinstated to consolidate their function as key commercial frontages on the High Road. 829 High Road will be removed, and Brunswick Square will be widened to form a new pedestrian/cycle prioritised route to connect with the new public park proposed within the wider masterplan. In turn, this will create a small public space, helping to activate the street.

4.13 The entrance to Brunswick Square maintains the approved principles of the extant consent, which was in turn designed in collaboration with Officers at LBH. This is framed by a new "gateway" feature along with new landscaping.

4.14 Further details on the design and materials are outlined in the accompanying DAS.

Open and Amenity Space

4.15 A mix of amenity spaces would be provided on-site, with 405.2sqm of internal student amenity spaces proposed at ground floor level, and further external amenity spaces included at ground and roof level. A total of 4.55sqm of amenity space per student bedspace is included.

4.16 The Site will also connect with the future Peacock Park to its north-west which will be delivered as part of the future masterplan phases, providing direct pedestrian access from Brunswick Square. A considerable part of this park is proposed as part of the extant planning permission for the Goods Yard and The Depot.

Demolition of 829 High Road

- 4.17 The proposals demolish the locally listed 829 High Road which is in the north-east corner of the Site, at the junction of Brunswick Square and the High Road. This building is of low architectural and historic interest and Brunswick Square to its rear is narrow, unattractive and unsafe. As confirmed in the accompanying Heritage Statement, the building makes a very low contribution to the surrounding Conservation Area.
- 4.18 The removal of 829 High Road allows the creation of a high-quality public space along Brunswick Square with active frontage, defined by a new gateway entrance at its intersection with the High Road. A considerable uplift in the quality of the public realm is achieved allowing both vehicles and pedestrians to use this space safely, with a new segregated pedestrian route improving access generally, but also for wheelchair users.
- 4.19 There are clear place making benefits that arise from the approach to Brunswick Square and, importantly, these will support its function as a key east-west route through the masterplan area from the High Road. The considerable uplift in design, quality and public benefits that arise to this space improve the setting of the Conservation Area, in addition.
- 4.20 In addition to a strong design rationale, the widening of Brunswick Square through the removal of 829 High Road supports the servicing strategy for the Site and allows sufficient width for access by service and refuse vehicles as part of the Site's development. This allows servicing via Brunswick Square as part of the Site's development in the "interim" masterplan state, although this could potentially be serviced from the west as part of the future masterplan phases coming forward.
- 4.21 Importantly, the principle of removing 829 High Road is established through the extant consent at the Site and the enclosed application maintains this accepted approach.

Parking

- 4.22 The development is car free with the exception of a single accessible parking space, located in the south-west corner of the development.
- 4.23 A total of 237 cycle parking spaces are proposed as follows:
- Student (new build): 207 long-stay and 7 short-stay.
 - Student (High Road properties): 8 long-stay and 2 short-stay.
 - Commercial: 4 long-stay and 9 short-stay.
- 4.24 All cycle parking would accord with the London Cycle Design Standards.

5 Planning Policy Overview

Introduction

5.1 This Section summarises the national, regional, and local planning policy context to the proposals.

The Development Plan

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

5.3 The relevant Development Plan comprises:

- The London Plan (March 2021).
- The LBH Strategic Policies (SP) DPD 2013 (with alterations 2017) (adopted July 2017).
- The LBH Development Management (DM) DPD (adopted July 2017).
- The Tottenham Area Action Plan (TAAP) (adopted July 2017) .

5.4 The National Planning Policy Framework (NPPF) (July 2021) and accompanying Planning Practice Guidance (PPG) are the principal material considerations in this case, alongside various Supplementary Planning Guidance/Documents (SPDs/SPGs) as noted below.

Site Designations

5.5 The Site is subject to the following designations in the Development Plan:

- Site Allocation 'NT5' – High Road West.
- North Tottenham High Road Conservation Area and an Archaeological Priority Area.
- Locally Listed Buildings (823 - 829 High Road).
- Grade II Listed Building (819-821 High Road).
- Northumberland Park Growth Area.
- Family Housing Protection Zone.
- A defined Tall Buildings Growth Area.
- Critical Drainage Area.

5.6 The Site is in an edge-of-centre location, being outside of (but directly opposite) the Tottenham High Road Local Shopping Centre boundary.

Tottenham Area Action Plan (AAP)

- 5.7 The TAAP is the key statutory planning document delivering the regeneration strategy for Tottenham. It establishes the local spatial planning framework for the area, giving detailed expression to the overall growth objectives for Tottenham as contained in the SP DPD.
- 5.8 Where development forms part of an allocated site, Policy DM55 of the DMP DPD requires a masterplan to be prepared for the wider area to demonstrate that the proposal would not prejudice the future development of other parts of the allocation.
- 5.9 The Site lies within Site Allocation 'NT5' (High Road West), for which the TAAP provides the following indicative development capacity (P102): 1,200 net new homes; 4,353sqm commercial use; 11,740sqm town centre uses; and 1,200sqm other uses.
- 5.10 Paragraph 5.125 provides a description of the NT5 allocation:

“Masterplanned, comprehensive development creating a new residential neighbourhood and a new leisure destination for London. The residential-led mixed use development will include a new high-quality public square and an expanded local shopping centre, as well as an uplift in the amount and quality of open space and improved community infrastructure”.

- 5.11 The Site requirements for NT5 (P104) state that any proposed development should accord with the principles set out in the most up-to-date Council-approved masterplan. This is the High Road West Masterplan Framework (HRWMF) published by Arup in September 2014 and is considered further in this Section.
- 5.12 The APP also outlines several development guidelines (P105) for Site Allocation NT5 as a whole:
- Provide a net increase in the amount/quality of public open space and private amenity space.
 - Be designed for future connection to the District Energy Network (DEN).
 - Establish clear building frontages along the High Road.
 - Incorporate a range of residential typologies which could include courtyard blocks of varying heights.
 - In the part facing the new Stadium, respond to both the High Road character and the greater heights and density of the new Stadium.
 - Outline an assessment of the significance of any heritage assets, and how the development responds to this.

High Road West Masterplan Framework (September 2014)

- 5.13 The HRWMF provides guidance for future planning applications with Site Allocation NT5. It establishes key principles to guide future development proposals and sets out indicative guidance on massing, heights, land uses and phasing. The TAAP (P104) requires development proposals to accord with the general principles established by the HRWMF.

- 5.14 Table 3.7 of the HRWMF provides indicative capacities for Site Allocation NT5. This includes, amongst others, 117,940sqm of residential floorspace (c. 1,200 units); 2,130sqm of retail; 2,690sqm of food and beverage; and 4,420sqm of cinema use.
- 5.15 The Site broadly straddles two character areas of the HRWMF: (i) The High Road, which is the traditional high street to the High Road with a range of shops and services that will better service the local community and attract new visitors; and (ii) Peacock Mews, which integrates new living and workspaces behind the High Road, including the extension of the existing High Road properties to their rear.
- 5.16 The HRWMF illustratively shows that the Site mainly comprises new living and workspaces behind the High Road which seeks to retain and enhance the fine grain of urban environment. Both Brunswick Square and Percival Court are identified as shared surfaces by the HRWMF (P109). P124 suggests that indicatively heights could be developed around 5 storeys to the rear of the High Road frontage before stepping up considerably to the west of the allocation.
- 5.17 The HRWMF is considered in Section 6 of this Statement and in the accompanying DAS.

Upper Lee Valley Opportunity Area

- 5.18 The LP defines the London Borough of Haringey within ‘Outer London’⁹ and the Lee Valley Opportunity Area¹⁰ (the “OA”). Significant growth is projected in the OA, indicatively estimated at 21,000 new homes and 13,000 new jobs.
- 5.19 Paragraph 2.1.29 states:
- “The Lee Valley occupies a strategic position in the London-Stansted-Cambridge-Peterborough growth corridor and provides a range of development opportunities for higher density development. These opportunities include...other accessible sites within and on the edge of town centres...Crossrail 2 will transform transport connectivity and capacity in the Upper Lee Valley and is vital to support the full, long-term potential development capacity.”*
- 5.20 The LP states that all developments “*must*” make the best use of land by following a designed approach “*that optimises the capacity of sites, including Site Allocations*” (Policy D3).
- 5.21 The related Upper Lee Valley Opportunity Area Planning Framework (July 2013) is consistent with the above and recognises the regeneration potential of the OA.

⁹ London Plan 2021, Annex 2.

¹⁰ London Plan 2021, Table 2.1 and Figure 2.6.

Presumption in Favour of Sustainable Development / The Tilted Balance

5.22 The NPPF sets put a presumption in favour of sustainable development (Para. 11), stating that for decision-taking this means:

“(c) approving development proposals that accord with an up-to-date development plan without delay; or

(d) where there are no relevant development policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

(i) the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or

(ii) any adverse impacts of doing so would significant and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.”

5.23 Footnote 8 confirms that for applications involving “housing”, a failure to demonstrate a five-year housing land supply (“5YHLS”) will makes those policies most important for determining the application out-of-date. The NPPF (Para. 62) and London Plan (Para. 4.1.9 & 4.15.1) confirm that student accommodation is a type of housing, and this use therefore falls within the application of Footnote 8 and a Council’s 5YHLS.

5.24 The London Borough of Haringey have a housing supply equating to 3.87 years¹¹, equating to a shortfall of c. 2,900 homes. As such, the most important policies for determining the enclosed application are out-of-date, and the “tilted balance” (i.e. the presumption in favour of granting planning permission) is engaged.

5.25 Footnote 7 explains that “assets of particular importance” pursuant to sub-paragraph (d) (i) includes, amongst others, designated heritage assets.

5.26 The NPPF is a material planning consideration and does not override the primacy of the Development Plan afforded by Section 38(6) of the Planning and Compulsory Purchase Act 2004. As such, whilst the most important policies in this instance are out-of-date, they still attract weight when considering the Development Plan, albeit the weight to be attached is reduced as part of the tilted balance and presumption in favour of granting consent.

Key Planning Policies

Student Housing Delivery

5.27 The NPPF outlines the Government’s objective to “significantly boost” the supply of housing (Para. 60) and recognises the “important contribution” that small and medium sites can make towards achieving the housing requirements of an area. Paragraph 62 requires local authorities to meet the housing needs of different groups, including students.

5.28 London Plan Paragraph 4.15.1 is explicit that “*PBSA therefore contributes to meeting London’s overall housing need and is not in addition to this need*”. Paragraph 4.1.9 notes that

¹¹ As confirmed by the Inspector’s Report (Para. 11) to Planning Appeal APP/Y5420/W/21/3289690.

accommodation for students (non-self-contained) should count towards meeting housing needs on the basis of a 2.5/1 ratio.

- 5.29 Where affordable housing is proposed, the London Plan (Policy H15) requires the maximum level of accommodation to be secured as affordable student accommodation, with at least 35% provision required to follow the Fast Track Route (on non-industrial or non-public land such as the Site).
- 5.30 Strategic Policy DM15 requires student accommodation proposals to demonstrate that: (i) there would be no loss of existing housing; (ii) there would be no adverse impact on local amenity; (iii) the accommodation is of a high quality; (iv) provision is made for disabled students; (v) the need for additional bedspaces can be demonstrated; and (vi) the accommodation can be secured for occupation of a specified educational institution.
- 5.31 Whilst the Council's Housing Strategy (2017) suggests that there was no need for student housing in Haringey at that time, the more recent London Plan (2021) identifies a clear need for student accommodation across London. This states that London's overall housing need includes 3,500 PBSA bed spaces per annum. This is not broken down into borough-level targets as locational needs will vary over the Plan Period.
- 5.32 Furthermore, the Council's recent Officer Report to a nearby PBSA scheme at The Hale (ref. HGY/2021/2304) noted that there is a significant need for new homes (including student accommodation) across London as identified by the Mayor's Strategic Housing Market Assessment, and that the principle of new PBSA meeting housing needs was established (Paras 6.3.13 – 6.3.21).
- 5.33 London Plan Paragraph 4.15.4 requires a nomination agreement to be secured to link a development to a higher education provider. The London Plan is clear that a commitment to having such an agreement is a factor which demonstrates a need for student accommodation, irrespective of whether an operator is based on the same borough as a proposal.

Making Effective Use of Land

- 5.34 The NPPF requires planning decisions to make an effective use of land, in a way that makes "*as much use as possible*" of previously developed, brownfield land (Para. 119). The London Plan (Policy GG2) reflects this approach which is considered necessary to create successful and sustainable mixed-use places.

North Tottenham Growth Area

- 5.35 London Plan Policy SP1 identifies three growth areas within which development will be promoted. The Site lies within one of these areas, specifically the North Tottenham Growth Area (High Road West). Policy SP1 confirms that the Council will seek to maximise site opportunities and provide benefits for the surrounding communities through their development.

Economic Development

- 5.36 The London Plan (Policy GG5) supports economic development and regeneration. Similarly, the NPPF attaches "*significant weight*" to the need to support economic growth and productivity (Para. 81).

Heritage

- 5.37 Applicants are required by the NPPF to describe the significance of any designated heritage asset(s), and to consider the level of ‘*harm*’ arising from a development (Paras. 194/199). In this case, the relevant designated heritage assets are the Grade II listed 819-829 High Road, the North Tottenham Conservation Area and several surrounding listed buildings on the High Road.
- 5.38 Where “*less than substantial*” harm arises to the significance of a designated heritage asset, this should be weight against the public benefits arising (Para. 202).
- 5.39 For non-designated heritage assets (i.e. the locally listed buildings at 823-829 High Road), the NPPF notes that the effect of an application on the significance of the asset(s) should be taken into account in determining the application. In weighing applications that directly or indirectly 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 (Para. 203).
- 5.40 The NPPF is clear that when determining applications, local planning authorities should take account of the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses; the positive contribution that their conservation can make to sustainable communities, economic vitality; and the desirability of new development making a positive contribution to local character and distinctiveness (Para. 197). Paragraph 207 also recognises that not all elements of a Conservation Area will necessarily contribute to its significance.
- 5.41 Policy AAP5 seeks to achieve “well managed change” which balances continuity and the preservation of local distinctiveness and character, with the need for historic environments to be active living spaces that can respond to the needs of local communities.
- 5.42 The London Plan (Policy HC1) is consistent with the above, requiring proposals to conserve the significance of heritage assets by being sympathetic to their form, scale, materials and architectural detail. SP Policy SP12 seeks to ensure the conservation of the historic significance of Haringey’s heritage assets, specifying that the historic environment should be used as the basis for heritage-led regeneration and as the basis for good design and positive change.

Design

- 5.43 Achieving good design is a key aspect of sustainable development (NPPF, Para. 126).
- 5.44 Policy DM1 and London Plan Policy D5 require all development to achieve a high standard of accessible and inclusive design. The London Plan (Policy D6) also requires development make a positive contribution through its architecture, contribute to the distinctive character and amenity of the local area, and to not cause any unacceptable harm to the amenity of surrounding land and buildings.
- 5.45 LBH Policy DM2 seeks to ensure that new developments are accessible and safe, having regard to Secured by Design principles.

- 5.46 Despite being a type of housing for the purposes of meeting housing need, PBSA is treated differently in terms of design standards. The Mayor of London has also confirmed that the various guidance supporting the London Plan on residential standards do not apply to student housing¹² (Para. 2.1.13).
- 5.47 The GLA have also published a Practice Note¹³ which confirms that PBSA should be treated as hotel accommodation in line with Building Regulations. This means that hotel space requirements and internal facilities apply, and that either 10% or 15% of units should be wheelchair accessible depending upon which part of the Building Regulations they are being design to (London Plan Policy E10, H).

Retail and Town Centre Development

- 5.48 Local Plan Policy DM41 supports new retail, leisure and cultural uses at edge-of-centre locations where the proposal satisfies the sequential test and is aligned with the size, role and function of the centre and its catchment. The NPPF (Para. 87) also requires a sequential assessment to support applications for main town centre uses outside of town centres.
- 5.49 Notwithstanding, Local Plan Policy NT5 confirms that main town centre uses within the NT5 allocation are appropriate in principle, and that the town centre boundary is to be expanded to accommodate these (TAAP, Para. 2.18). The vision for NT5 is to create a new residential neighbourhood and a new leisure destination for London (TAAP, Para. 5.125), i.e. this vision cannot be achieved without the provision of such uses.

Sustainability

- 5.50 All new development is expected to be zero carbon, in accordance with Local Plan Policy SP4 and London Plan Policy SI2. LBH Policy DM21 (d) confirms that carbon offset payments can be used where proposals are unable to meet carbon dioxide emission reduction targets on-site.
- 5.51 LBH Policy SP4 also requires that all new non-residential development achieve BRE AAM 'Very Good' standard as a minimum.
- 5.52 London Plan Policy SI2 requires major development to achieve a minimum on-site energy reduction of 35% beyond Building Regulations (Part L). Non-residential development should achieve 15%.
- 5.53 Following the introduction of more stringent Part L Building Regulations in 2021, the GLA produced further guidance in November 2022 which recognises that non-residential developments may find it more challenging to achieve significant on-site reduction beyond Part L. In such instances, rather than complying with London Plan Policy SI2 in this respect, the GLA requires a demonstration of the alignment to the energy hierarchy to minimise emissions as far as possible before offsetting.

¹² Housing SPD (March 2016, updated August 2017) Para. 2.1.13; Housing Design Standards – London Plan Guidance (June 2023), P1.

¹³ Wheelchair Accessible and Adaptable Student Accommodation, Practice Note November 2022.

- 5.54 It is therefore entirely appropriate for a non-residential development to fall below the 35% improvement suggested by Policy SI2, providing that it follows this approach. The GLA guidance is a material consideration which must be considered as part of the overall planning balance.
- 5.55 Local Plan Policy DM22 requires all development to prioritise connection to planned future decentralised energy networks. All major development within 500 metres of a planned network, which is considered by the Council likely to be operational within three years of a grant of planning permission, will be expected to secure connection to that network subject to demonstration of technical feasibility and financial viability.

Transport

- 5.56 The NPPF is clear that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe (Para. 111).
- 5.57 LBH's adopted Local Plan promotes public transport, walking and cycling as measures to tackle climate change and improve local environmental quality (Policies SP7, DM31 and DM32).
- 5.58 The London Plan outlines maximum car parking standards and promotes car-free development as the starting point for all development (Policy T6). Policy T6.4 concerns hotel¹⁴ parking and at sites with a PTAL of 4-6 states that parking should be limited to operational needs, disabled parking, parking required for taxis and deliveries/servicing.
- 5.59 Policy 6.5 requires non-residential development to provide at least one accessible parking space. For "hotel" development, supporting Table 10.6 requires that 6% of the total parking provision to be designated accessible spaces, and 4% of the total provision to be enlarged bays.
- 5.60 London Plan Policy T5 and Table 10.2 outline the minimum cycle parking standards by relevant use class which are summarised in the Transport Assessment. The London Cycling Design Standards requires that 5% of all cycle provision be provided for larger bicycles.

Other Key Policies

- 5.61 The following matters are also relevant to the proposals:
- New development should be at least "*air quality neutral*" (LP Policy SI1 and Policy GG3).
 - Sustainable Urban Drainage Systems (SUDS) should be utilised where practical, and proposals should aim to achieve greenfield run-off rates (LP Policy SI13).
 - Proposals should mitigate, and reduce to a minimum, potential adverse impacts resulting from noise (NPPF Para. 185; LP Policy D14).

¹⁴ As noted above, GLA Guidance (Wheelchair Accessible and Adaptable Student Accommodation, Practice Note November 2022) states that PBSA should be treated as hotel accommodation, not residential.

Development should achieve a high standard of privacy and amenity to the users of a development and surrounding uses (Policy DM1). The scale of development should not cause material harm to the amenity of surrounding residents and occupiers of existing properties with regards to loss of daylight and sunlight, an increased sense of outlook, overlooking or a loss of privacy and excessive noise levels (LP Policy D6).

Relevant Supplementary Planning Guidance/Documents

5.62 The GLA have produced the following relevant SPGs/SPDs and guidance:

- Sustainable Design and Construction SPG (April 2014).
- Shaping Neighbourhoods: Character and Context SPG (2014);
- Use of Planning Obligations in the Funding of Crossrail, and the Mayoral Community Infrastructure Levy SPG (2016);
- Shaping Neighbourhoods: Play and Informal Recreation SPG (September 2012).
- Accessible London: Achieving an Inclusive Environment SPG (October 2014).
- Air Quality Positive (2023) and Air Quality Neutral (2023) London Plan Guidance.
- Be Seen Energy Monitoring Guidance (September 2021).
- Energy Planning Guidance (2022).

5.63 The following SPGs/SPDs are also relevant to the consideration of the proposals:

- High Road West Masterplan Framework (September 2014).
- LBH Sustainable Design and Construction SPD (adopted March 2013).
- Haringey Urban Character Study (February 2015).
- LBH Open Space and Recreation Standards SPD (March 2008).
- LBH Open Space and Biodiversity Study (October 2014).

5.64 A summary of the information relevant to the Site from the High Road West Masterplan Framework is outlined further below.

Summary

5.65 The Site lies within an Opportunity Area, a Growth Area and a Site Allocation (NT5) which support the comprehensive, residential-led regeneration of the Site and this part of Tottenham. Allocation NT5 supports the delivery of new residential (including student) and commercial uses in principle.

5.66 The Government is clear that local authorities must significantly boost the supply of new homes, with student accommodation being an important housing typology that will help to meet housing needs. There is an acute need for housing delivery in Haringey who cannot demonstrate a 5YHLS.

5.67 Policy also requires development to optimise the potential of brownfield sites through a design-led process. The Site is also within an area identified as being suitable for redevelopment and is well positioned to respond positively to this context.

- 5.68 By virtue of Haringey's failure to demonstrate a 5YHLS, those policies that are most important for determining the application are out-of-date. Whilst these policies must still be considered as part of the Development Plan, the presumption in favour of granting consent (the tilted balance) is engaged and the weight that these policies attract must be reduced accordingly.
- 5.69 Planning permission must therefore be granted unless any policies in the NPPF relating to designated heritage assets (i.e. 819/821 High Road and the Conservation Area) provide a clear reason for refusal, or any adverse impacts of granting consent would significantly and demonstrably outweigh the benefits, when assessed against the NPPF as a whole.

6 Comprehensiveness

- 6.1 This Section explains how the proposals will not prejudice delivery of the remainder the HRW Masterplan area, and how the Site will help to facilitate its delivery, in accordance with the requirements of Policy AAP1 of the TAAP, DM55 of the DM DPD and Site Allocation NT5.

Policy Context

- 6.2 Site Allocation NT5 expects “*masterplanned, comprehensive development creating a new residential neighbourhood and a new leisure destination for London*” (TAAP, Para. 5.125).
- 6.3 The NT5 site requirements specify that development should accord with the most up-to-date Council-approved masterplan, which in this case is the HRWMF (Arup, 2014).
- 6.4 The key Development Plan policies are Policy DM55 of the DM DPD and Policy AAP1 of the TAAP. Policy DM55 states:

“(A) Where development forms part of an allocated site, the Council will require a masterplan be prepared to accompany the development proposal for the wider site and beyond, if appropriate, that demonstrates to the Council’s satisfaction, that the proposal will not prejudice the future development of other parts of the site, adjoining land, or frustrate the delivery of the Site Allocation or wider area outcomes sought.

(B) In preparing their proposal and the wider site masterplan, the Council expects the applicant to have engaged with and sought the views of the landowner(s) and occupiers of the other part(s) of the allocated site and, where appropriate neighbouring properties.

(C) In the interim period where a masterplan is to be prepared, but has not come forward as part of the planning application, proposals must demonstrate that they will not compromise delivery of the outcome sought by the Site Allocation.” (Quod emphasis).

- 6.5 Policy AAP1 states:

“(A) The Council expects all the development proposals in the AAP area to come forward comprehensively to meet the wider objectives of the AAP. To ensure comprehensive and coordinated development is achieved, masterplans will be required to accompany development proposals which form part of a Site Allocation included in this Plan. Applicants will be required to demonstrate how the proposal:

- a. Contribute to delivering the objectives of the Site, Neighbourhood Area and wider AAP;*
- b. Will integrate and complement successfully with the existing and proposed neighbouring developments; and*
- c. Optimises development outcomes on the site.*

(B) The Council will direct development to Growth Areas and Areas of Change, and will support planning applications which accord to the delivery of Neighbourhood Objectives, and site requirements. Planning applications for development within the Tottenham AAP area which

promote the positive regeneration of Tottenham, in line with the principles of the Strategic Regeneration Framework.

(C) The Council will take a proactive approach to working with landowners, the Mayor of London, the local community and other interested parties to help deliver the changes needed in Tottenham to meet the shared vision for the regeneration of Tottenham.....” (Quod emphasis).

- 6.6 Importantly, the context to part (a) of Policy AAP1 was introduced during the examination of the TAAP in response to comments provided by the Inspectors Report¹⁵, which read:

“There are 11 area wide policies (AAP) which, in addition to other local plan documents, aim to guide and manage new development in the area. Policies AAP1 and AAP2 promote a co-ordinated approach to regeneration through Tottenham. This is essential to achieve high quality and inclusive environments. To ensure implementation of development is flexible, modification AAPMM10 add that the aspirations for comprehensive development should enable the component parts to be developed separately as long as they do not compromise aims for the wider area. Without this policy AAP1 would not be positively prepared.” (Quod emphasis).

- 6.7 Accordingly, the supporting text to Policy AAP1 in Paragraph 4.6 of the TAAP was modified, and as adopted states that:
- 6.8 “...Haringey wants to ensure development proposals do not prejudice each other, or the wider development aspirations for the Tottenham AAP Area whilst enabling the component parts of a Site Allocation to be developed out separately.” (Quod emphasis).
- 6.9 The principle of developing component parts of NT5 is also established through various consents across the allocation which have been approved by the Council. This includes the extant planning permission for the Printworks site (ref. HGY/2021/2283), the extant consent allowed at appeal for the Goods Yard and The Depot sites (ref. HGY/2021/1771) and the pending (resolution to grant) for the Goods Yard and The Depot sites (ref. HGY/2022/0563).
- 6.10 To therefore satisfy comprehensiveness in accordance with the requirements of Policies DM55 and AAP1, the application must demonstrate that (each is discussed below, in turn):
- (1) The proposals will not prejudice the achievement or delivery of comprehensive development;
 - (2) They have been informed by discussions with neighbouring landowners;
 - (3) They contribute to the objectives of the wider area;
 - (4) The proposals integrate and complement with existing and proposed neighbouring development; and
 - (5) They optimise development outcomes.

¹⁵ Inspectors Report to TAAP dated 28 April 2017, Paragraph 80.

(1) Not prejudice comprehensive development

- 6.11 The TAAP seeks that Site Allocation NT5 is brought forward in a comprehensive matter. Although the HRWMF sets out a comprehensive overall redevelopment, the phasing provisions within the HRWMF explicitly recognise existing land ownership. They seek to create discrete development plots in each phase and assume a possible interim end state at each phase, whilst allowing flexibility for the masterplan to adapt over time.
- 6.12 Matters of comprehensiveness were considered by the Inspector to the Goods Yard appeal¹⁶. At Paragraph 18, the Inspectors Report notes that: (i) the HRWMF allows for parts of Site Allocation NT5 to be developed independently; and (ii) the HRWMF phasing provisions create distinct development plots and assumes a possible interim end-state for plots, whilst allowing flexibility for the framework to adapt over time.
- 6.13 Extant planning consents for both the Goods Yard and The Depot (ref. HGY/2018/0187 & HGY/2019/2929) have twice established the appropriateness of granting planning consent for certain parts of NT5 only alongside a masterplan for the wider allocation. These consents have also modified the HRWMF framework in parts which is a material consideration in the determination of this application.
- 6.14 Subsequent consent at the Goods Yard and The Depot was granted at appeal (ref. HGY/2021/1771) which continued the principle of developing individual land components. This was again reinforced through the more recent (July 2023) resolution to grant consent secured for a similar development at these sites (HGY/2022/0530).
- 6.15 Furthermore, the Site itself benefits from an extant consent for its redevelopment approved in the same policy context (ref. HGY/2021/2283).
- 6.16 Illustrative masterplans are provided in the DAS which shows how the proposals integrate with the various existing and emerging context which could occur across site NT5, being:
- The existing site context.
 - The HRWMF, being the 2014 Arup Masterplan.
 - The extant approval for the Goods Yard and The Depot (HGY/2021/1771) and the resolution to grant consent for a very similar scheme (HGY/2022/0563).
 - The LBH/Lend Lease hybrid scheme for Site Allocation NT5, which includes the Printworks site in outline form (HGY/2021/3175).
- 6.17 Through the above analysis, the DAS demonstrates that the proposals can function independently during the interim phase and be fully integrated as part of the future development of the masterplan area in all potential scenarios.
- 6.18 Consistent with the broad principles of the HRWMF that apply to the Site, in both the interim and future phases, the proposals would:

¹⁶ Planning consent reference HGY/2018/0187, Appeal reference APP/Y5420/W/18/3204591.

- Provide an appropriate mix of housing, meeting the needs of student housing (including affordable student accommodation).
- Provide a range of shops and services that service the local community and attract new visitors, protecting the traditional High Street function.
- Integrating new living and commercial spaces “behind the High Road”, including the extension of the existing High Road properties to their rear, in a manner which enhances the urban environment.
- Optimising the density of the Site through a design-led process, consistent with London Plan requirements (Policies H1 and D3).
- Provide a high-quality, safe and accessible shared surface to Brunswick Square which will provide future east-west connections through the masterplan area, whilst also connecting with Percival Court to the south.
- Achieving a stepping in heights across the Site that mediates between the lower rise properties to the High Road (east) and the future development of tall buildings to the west.
- Provide an attractive interface with the future development of Peacock Park to the north-west and connecting the High Road to both this park and wider development parcels of the HRWMF with an attractive public realm along Brunswick Square.

6.19 The scheme rises from 2 storeys to the rear of the High Road, to 4/5 storeys to the west, retaining the core principle of the HRWMF to rise away from the High Road and complying with the indicate heights of 3-5 storeys outlined by the HRWMF. The sole exception is the north-west corner only (6 storeys), which marginally exceeds the indicative upper height limit of the HRWMF.

6.20 This 6-storey element comprises a small portion of the building only, being of a high-quality design and providing a strong focal point to the future (emerging) Peacock Park. It is also appropriate in heritage terms and does not cause any unacceptable harm to surrounding heritage assets. Indeed, this height is already established and accepted through the extant consent for the Site, and the wider principle of heights exceeding those indicatively shown in the HRWMF is established through the extant planning consents at the Goods Yard and The Depot.

6.21 Alongside this, adopted policy provides a clear support for optimising the development potential of sites and there is a drive to significantly boost housing delivery, including within High Road West. There is, therefore, a broader supportive context for optimising the development capacity of the Site and any such proposals should be considered on their own merits and subject to a design-led process.

6.22 As well as being entirely appropriate in their own right (i.e. the “interim” masterplan state), the Printworks has been designed to integrate with the emerging schemes at the Goods Yard and The Depot. These sites are within the Applicant’s control and benefit from an extant consent (HGY/2021/1771) and a resolution to grant for a modified, but very similar scheme (HGY/2022/0563).

6.23 The proposals are also fully compatible with the consented Lend Lease development for NT5 (HGY/2021/3175). The Officer Report to this consent recognised that the hybrid consent was

sufficiently flexible to accommodate the consented Printworks development within its parameters, with neither scheme prejudicing the other.

- 6.24 The current proposals would therefore satisfy the Council's strategic regeneration aims for Site Allocation NT5 and optimise its development potential in accordance with design and policy objectives.
- 6.25 Considering the Printworks, Goods Yard and The Depot collectively from the outset of their respective design development has allowed the Applicant to consider the future masterplan state and relationship between these sites effectively, ensuring that they can integrate with each other as the NT5 allocation is delivered as a whole, and maximising the synergy and benefits that arise from such a comprehensive approach.

(2) Discussions with neighbouring landowners

- 6.26 The proposals are designed to work with the existing surrounding context, either as an interim state, or if neighbouring land is not developed or is phased after the occupation of the Site. There is also sufficient flexibility incorporated into the design to ensure integration with any updated masterplan that may come forward for the HRW area.
- 6.27 The proposals are an evolution of the consented scheme for the Site, retaining the approved design principles with the main change being an alternative typology of residential development now being included.
- 6.28 As part of the pre-application engagement for the extant consent, discussions have taken place with the Peacock Industrial Estate to the west (rear) of the Site. As part of their wider proposals for the Goods Yard and The Depot, the Applicant has also held discussions with the Carberry Industrial Estate and the Cannon Road development to the north.
- 6.29 All residents and businesses within a defined and agreed catchment were notified of the proposals and invited to attend the virtual public webinars and/or to review the proposals via the Applicant's consultation website.
- 6.30 Further engagement with the local business and resident community has taken place through the Club's regular dialogue with their Business and Community Liaison Group (BCLG). This has included dialogue with the BCLG regarding the current, modified scheme which was positively received.

(3) Contribute to wider objectives

- 6.31 Site Allocation NT5 is intended to create a new residential neighbourhood and a new leisure destination for London, which will include a new high-quality public square and an expanded local shopping centre, as well as an uplift in the amount and quality of open space and improved community infrastructure.
- 6.32 TAAP Policy AAP1 "*expects*" proposals to optimise the development outcomes on sites. In this context, a set of site requirements and supporting development guidelines underpin Site Allocation NT5 (P104), including:

- Creation of a new residential neighbourhood through increased housing choice and a minimum of 1,400 new homes of a mix of tenure, type and unit size.
- Where feasible, viable uses should be sought for existing heritage assets.
- Provide a net increase in the amount and quality of both open space and private amenity space.
- Improved east-west pedestrian and cycling connections with places such as the Northumberland Park Estate and Lee Valley Regional Park.
- Increase and enhance the quality and quantity of community facilities and social infrastructure that support 7-day a week activity.

6.33 In response, the proposals provide up to 287 new student bed spaces in response to Haringey's acute housing need, of which 35% will be affordable student homes. This equates to 114.8 residential homes in accordance with the ratio stated by the London Plan (Paragraph 4.1.9).

6.34 Both statutorily and locally listed buildings would be sensitively adapted and incorporated into the proposals as part of the development, with a stepping of heights away from the High Road frontage to protect and enhance their setting. The reuse and enhancement of these buildings will contribute towards improving the quality and access to heritage assets within, and surrounding, the Conservation Area.

6.35 The enclosed Heritage Statement confirms that there are heritage-specific benefits arising from the proposals which would decisively outweigh the low levels of harm arising to designated heritage assets. Coupled with the significant public benefits that also arise (see Section 7 of this Statement), this low level of harm is demonstrably outweighed and the proposals have a positive heritage effect to both the Site and surrounding area, on balance.

6.36 Through the removal of 829 High Road, the scheme can deliver a high-quality public realm to Brunswick Square which can provide future east-west connections between the High Road and masterplan area. This is a significant improvement upon the existing position, improving the active frontage, security and accessibility of Brunswick Square as an accessible route for pedestrians (including wheelchair users), cyclists and vehicles.

6.37 The proposals will therefore help to deliver the designation objectives through the provision of new homes (including affordable accommodation), supporting commercial uses and new open spaces, including publicly accessible open space and a high-quality public realm along Brunswick Square. On-site open space would also be provided.

6.38 In addition to the specific objectives of NT5, the proposals also respond positively to wider (and more recent) policy objectives at the national and regional (London Plan) levels which include:

National Planning Policy Framework (NPPF)

- A Government objective of “*significantly boosting*” the supply of housing (Para. 60). The NPPF is clear that student accommodation is an integral part of housing need.
- Ensuring that planning decisions promote an effective use of land, making “*as much use as possible*” of previously developed land (Para. 119).

- A requirement for local authorities to determine their “*minimum*” number of homes (Para. 61), i.e. housing delivery should be treated as a ‘floor’ and not a ‘ceiling’.
- The above must be considered against Haringey’s failure to demonstrate a 5YHLS.

London Plan (2021)

- All developments “*must*” make the best use of land by following a design-led approach “*that optimises the capacity of sites, including Site Allocations*”. Higher density developments should be well located to jobs, services infrastructure and amenities by public transport, walking and cycling (Policy D3).
- Those involved in planning “*must proactively explore the potential to intensify the use of land to support additional homes and workspaces, promoting higher density development*” (Policy GG2).
- Boroughs should “*optimise the potential for housing delivery*” on all suitable and available brownfield sites (Policy H1).

6.39 The proposals will make a considerable and positive contribution to wider objectives.

(4) Integrate and complement existing and proposed neighbouring development

6.40 The layout of the proposals ensures that the Site can function independently of the wider area (i.e. in the interim state, or in the event that the neighbouring land is not developed), or as an integral part of the future HRW area. There is an inherent flexibility incorporated into the design to ensure integration with any updated masterplan which may come forward for the HRW area.

(5) Optimise development outcomes

6.41 The proposals have followed the principles of the HRWMF and as demonstrated in the remainder of this Statement, accord with the relevant Development Plan. They have been considered collectively alongside the Club’s emerging proposals for the Goods Yard and the Depot sites to the west, and the Lend Lease proposals for High Road West, to ensure that they would form an effective part of the future masterplan development.

Summary

6.42 Specific to the requirements of DM DPD Policy DM55 and Policy AAP1 of the TAAP:

- The proposals will help with the wider achievement and delivery of comprehensive development within NT5. The LBH have previously approved planning applications for individual sites within Site Allocation NT5 including at the Site, where these have provided a masterplan showing complementary redevelopment. This approach has also been accepted twice by the Planning Inspectorate at appeals relating to the Goods Yard and The Depot sites.
- The proposals have been designed to integrate with the Applicant’s emerging proposals at the Goods Yard and The Depot, in addition, which collectively will deliver a significant part of NT5. The proposed layout therefore functions effectively in an interim state, or as an integral part of the future redevelopment of NT5.

- The Applicant have undertaken a comprehensive pre-application engagement process with neighbouring landowners, including local residents and businesses. The enclosed proposals are an evolution of the previously consented proposals at the Site, retaining the agreed design approach and proposing an alternative residential typology.
- The proposals would make a significant and positive contribution to wider objectives for the area, optimising the Site's development potential in a sustainable manner that is consistent with the broad principles of the HRWMF.
- The application optimises the development outcomes for the Site, including an increased number of homes (including affordable accommodation).

7 Other Planning Considerations

7.1 This Section considers the relevant planning policies, guidance and other material considerations referred to in Section 5. It addresses the following matters:

- The principle of the development.
- Loss of the La Royale Banqueting Suite.
- Loss of Retail Uses.
- Student accommodation.
- Commercial Development.
- Technical Matters, being: heritage; design; open space; transport; environmental considerations; energy and sustainability; and main town centre uses.

7.2 Each of the above is considered in turn below.

Principle of Development

7.3 The principle of student-led, mixed-use development at the Site is established at all levels of relevant planning policy and guidance, given that:

- The NPPF (Para. 62) and London Plan (Para. 4.1.9 & 4.15.1) confirm that student accommodation is distinct type of housing. Paragraph 4.15.1 states that “*PBSA therefore contributes to meeting London’s overall housing need and is not in addition to this need*”.
- The London Plan confirms that the Site is within the Lee Valley OA whereby significant growth in new homes (c. 21,000) and jobs (c. 13,000) is projected. This growth in homes is to include new student accommodation, therefore.
- The Site lies within an area defined by the LBH for growth, being the Northumberland Park Growth Area. SP DPD Policy SP1 encourages growth in such areas. DMD Policy DM15 also confirms that further student accommodation is to be accommodated in Haringey’s Growth Areas.
- The Site forms an integral part of Site Allocation NT5, being at the interface between the High Road and the west of the allocation. NT5 is allocated for major regeneration to create a new residential neighbourhood and leisure destination for London.

7.4 The principle of optimising the development potential of brownfield land is also supported by the London Plan. This states that all developments “*must*” make the best use of land following a design-led approach “*that optimises the capacity of sites, including site allocations*” (Policy D3).

7.5 The proposed development is therefore acceptable in principle.

Loss of the Banqueting Suite

7.6 The La Royale Banqueting Suite occupies the Grade II listed 819-829 High Road and the unlisted extension to the rear. This is a commercial operation operating on a private-for-hire basis. It is run solely as a business for profit.

7.7 London Plan Policy S1 resists the loss of social infrastructure with supporting paragraph 5.1.1 defining social infrastructure as:

“health provision, education, community, play, youth, early years, recreation, sports, faith, criminal justice and emergency facilities”.

7.8 Paragraph 5.1.1 continues that:

“There are a wide range of providers delivering these services, from large state-funded organisations, public and private institutions and specialist providers, to charitable trusts, the voluntary sector, community and faith groups, and individuals”.

7.9 LP Policy S1 is supported by the Mayor’s Social Infrastructure SPG (2015). Figure 4 of the SPG provides an example categorisation of facilities, including a definition of community facilities as comprising the following sub-categories: *“schools, community centres/halls/rooms, youth clubs, and local use with a public benefit”.*

7.10 At a local level, Local Plan Policy DM49 resists the loss of social and community facilities without replacement, with the definition including education/training facilities, health facilities, community halls, places of worship and pubs. This Policy also states that community infrastructure will be protected and enhanced in line with the Council’s Infrastructure Delivery Plan (IDP). The site is not recognised in any form by the IDP; indeed, the only community facilities included relate to education and youth facilities, i.e. those consistent with the London Plan definitions.

7.11 The existing use at the La Royale Banqueting suite is distinctly different and outside of the above definitions, comprising a private commercial business that operates as a ‘Sui Generis’ use, and one that is not publicly accessible to the wider community. It operates solely as a commercial business which is available for private hire for events.

7.12 The Banqueting Suite does not have a distinctive local use with public benefit, nor it is an education or youth facility. It falls beyond the definition of either social infrastructure or a community facility, even when applied in a broad sense, both of which are intended to support the needs of local resident population.

7.13 Similarly, a private commercial business such as the Banqueting Suite cannot be considered a cultural facility, with it having little social impact upon the character, attractiveness or wellbeing of the local community and adding little cultural heritage value to this part of Tottenham.

7.14 Notwithstanding the above, the Site is also part of a strategic site allocation whereby the loss and/or replacement of existing uses is anticipated and planned for by Haringey in this location. In particular, the HRWMF envisages the retention of the High Road properties, with the rear

extensions being removed to accommodate new development. Most of the Banqueting Suite space is within the rear (unlisted) extension which the HRWMF anticipates is to be removed.

- 7.15 The Officer Report to the extant scheme also considered the use of the La Royale Banqueting use, concluding that (Para. 6.3.16):

“...it comprises a private Sui Generis use that is not publicly accessible to the wider community and operates solely as a commercial business which is available for hire for private events. As such, officers do not consider that it comprises a community facility or piece of social infrastructure and that it is not protected by policy. The Cannon Road Residents Group has written to support this view and to point out the disturbance that the existing use causes.”

- 7.16 The loss of the commercial operations at the Banqueting Suite is therefore acceptable, and DMD Policy DM49 and London Plan Policy S1 do not apply.

Loss of Retail Uses

The Site falls outside of the defined North Tottenham Local Centre and outside of a potential expanded Local Centre around a new Moselle Square within the HRWMF. The proposals would also provide new, enhance commercial uses which could include retail. The loss of the existing retail uses in the High Road properties is therefore acceptable.

Student Accommodation

- 7.17 The proposals will make a meaningful contribution to the delivery of new homes in Haringey, aligning with the requirements of the NPPF to significant boost housing delivery (Para. 60) and a recognition that housing requirements are a minimum (Para. 61), i.e. a sustainable exceedance beyond these minimum requirements should be supported.

- 7.18 This is of particular importance given Haringey's shortfall in housing delivery, confirmed by their lack of 5YHLS. This equates to a shortfall of c. 2,900 homes.

- 7.19 Strategic Policy DM15 is supportive of student accommodation in principle, providing that six criteria are satisfied. These are all address as follows:

There would be no loss of existing housing

- 7.20 The London Plan confirms that the loss of existing housing should be replaced by new housing at existing or higher densities (Policy H7). It also confirms that student accommodation should contribute to housing needs at a ratio of 2.5 / 1.

- 7.21 The Site would therefore deliver an equivalent of 114.8 new homes (287 student bedspaces), which is a significant net gain above the existing 13 homes on site. This is more than the extant consent.

- 7.22 This is acceptable in policy terms and Policies DM15 and H7 are satisfied. The loss of 13 homes and replacement with 72 homes was also accepted by Officers through the extant consent at the Site.

There would be no adverse impact on local amenity

- 7.23 As explained in the following sub-sections of this Report, the proposals are appropriate in the context of their surroundings and would not lead to any adverse impacts on amenity through noise, air quality, daylight/sunlight or any other matter.

The accommodation is of high quality

- 7.24 A high quality student scheme would be delivered, providing good room sizes for students alongside supporting kitchen/living/dining/facilities which equate to an additional 4.33sqm of space per student living within a cluster unit.
- 7.25 Alongside this, the proposals as a whole provide 405.2sqm of internal amenity spaces with further external amenity spaces at ground and roof levels. In total, 4.55sqm of amenity space per student is included.

Provision is made for disabled students

- 7.26 The proposals will provide 10% of all student bedspaces as accessible units, consistent with the requirements of the GLA's Practice Notice¹⁷ on student accommodation.

A need can be demonstrated

- 7.27 The London Plan identifies a need for 3,500 new student bedspaces per annum across London. More recent research by Savills¹⁸ has identified a soaring need for student accommodation across London, estimating that there are 3.8 student competing for each purpose-built student bed and a decreasing quantum of bedspaces coming forward through applications, being 27,000 in 2022 compared to a peak of 72,000 in 2016. The Savill's research shows 344,065 undergraduate and postgraduate students in London, compared with 91,351 beds in 2021-2022.
- 7.28 A letter of support is enclosed as part of the application from Middlesex University to demonstrate their commitment to the proposals. The Applicant will also secure a Nominations Agreement through the Section 106 (S106) Agreement. The London Plan (Para. 4.14.5) confirms that a commitment to having a Nominations Agreement is sufficient to demonstrate a need for student accommodation, irrespective of whether an operator is located in the same borough as a proposal (Para. 4.15.4).

The accommodation can be secured for occupation by a specified educational institution and would provide an element of affordable accommodation in accordance with Policy DM13

- 7.29 As explained above, consistent with London Plan requirements a Nominations Agreement will be secured via a S106 Agreement. Affordable housing will be provided in accordance with more recent London Plan requirements (see below).

¹⁷ Wheelchair Accessible and Adaptable Student Accommodation, Practice Note November 2022.

¹⁸ <https://www.standard.co.uk/business/london-student-housing-shortage-research-a-level-results-b1100984.html>

- 7.30 All relevant parts of Policy DM15 are therefore satisfied and the provision of student accommodation is acceptable.

Density

- 7.31 Unlike its predecessor, the current London Plan does not prescribe density targets for sites relative to their PTAL rating. Rather, it seeks to optimise the capacities of sites by making the best use of land, supporting higher densities at sites that are well located to jobs, services, infrastructure and amenities by public transport, walking and cycling (Policy D3).
- 7.32 Reflective of this approach, LP Policy GG2 requires that planning “*must proactively explore the potential to intensify the use of land to support additional homes...promoting higher density development*”. Policy H1 adds that Boroughs “*should optimise the potential for housing delivery*” on all suitable and available brownfield sites.
- 7.33 There is no prescribed density for the Site, therefore. Each case must be assessed on its own merits having regard to policy intentions to boost housing delivery and optimise brownfield sites.
- 7.34 The proposals have been subject to a design-led process in consultation with the LBH and other key stakeholders, and deliver an appropriate density of development that balances policy objectives to optimise the development capacity of brownfield sites; intensify the use of land; deliver more student homes in sustainable locations; and respect the heritage context. The enclosed Heritage Assessment confirms that the scale of development is acceptable within the Site’s heritage context, stepping away in height from the more sensitive High Road and delivering considerable benefits.
- 7.35 The proposals therefore respond positively to these requirements and the proposed density is appropriate for the Site. Furthermore, the scale, quantum and massing of development is consistent with the extant consent at the Site, i.e. a density of development which has been deemed appropriate.

Affordable Student Accommodation

- 7.36 DMD Policy DM13 seeks the “maximum reasonable” amount of affordable housing on schemes greater than 10 units. The policy confirms that this applies to student accommodation.
- 7.37 The more recent London Plan (Policy H15) requires at least 35% of student beds to be affordable to follow the Fast Track Route on non-industrial or non-public land such as the Site.
- 7.38 The proposals will provide 35% (100 beds) on-site as affordable student accommodation. Policy is satisfied and the application benefits from the Fast Track Route. Affordable housing would be secured by a S106 Agreement.

Commercial Development

- 7.39 The principles of the HRWMF include creating a net increase in jobs and business opportunities. They also seek to provide a range of retail, commercial and leisure uses to encourage a greater mix and wider retail offer.

- 7.40 The proposed quantum of commercial floorspace (238sqm GEA) is proportionate to the indicative capacities envisaged by the HRWMF (4,350sqm commercial and 11,740sqm town centre uses).
- 7.41 The proposals include complementary commercial uses which provide variety and interest, support the existing and new local population. They will provide natural surveillance and activity throughout the scheme, including to the public routes and spaces, and will benefit the Site both in its interim development stage as well as alongside the future masterplan delivery.
- 7.42 The proposed supporting commercial (Class E) uses are acceptable in principle across the entirety of NT5. .

Heritage

Statutory Requirements

- 7.43 The starting point for assessing heritage impact is the statutory duty, imposed by the Planning (Listed Buildings and Conservation Areas) Act 1990, to pay special regard to the desirability of preserving listed buildings and their setting (S66), and preserving or enhancing the character or appearance of a Conservation Area (S72).
- 7.44 Case law¹⁹ has established that if a decision maker is to apply themselves to the application of the NPPF heritage tests and a consideration of whether any harm arises, then they will have complied with this statutory duty.
- 7.45 As explained further below, the application has full regard to this statutory duty and would preserve and/or enhance the relevant heritage assets, being the Grade II listed 819-819 High Road, adjoining locally listed buildings and the North Tottenham Conservation Area.

Policy Requirements

- 7.46 Great weight is attached to the conservation of heritage assets. Consistent with the NPPF requirements (Para. 194), the application is supported by a Heritage Statement which considers the significance of the relevant heritage assets and the relationship of the proposed development to this, including both designated and non-designated heritage assets.
- 7.47 The Heritage Statement concludes that the proposed development would result in both heritage harm and heritage-specific benefits, with the harm being “less than substantial” but the heritage benefits being significant.
- 7.48 In respect of the designated heritage assets, the Heritage Statement confirms that no harm would arise to the Grade II listed 819-821 High Road, with harm only arising to the North Tottenham Conservation Area. Accordingly, Paragraph 202 of the NPPF is therefore engaged in respect of the Conservation Area only, requiring this harm to be outweighed by the public benefits arising.

¹⁹ *Jones v Mordue & Others [2015] EWCA Civ 1243.*

7.49 Dealing with each of the relevant designated heritage assets in turn:

819-821 High Road (Grade II listed)

- 7.50 The listed building would be enhanced by the repairs and refurbishment works that are proposed, including the removal of clutter to the frontage; the reinstatement and repair of brickwork and joinery; the reinstatement of the original roof and chimneystack; the replacement of poor-quality doors/windows; and the removal of poor-quality rear extensions.
- 7.51 The Heritage Statement concludes that the proposed alterations would result in considerable heritage benefit to this property, without causing any harm to its significance. The new development to its rear would enhance its setting through integration with a high-quality new development, replacing the poor-quality existing townscape.

The North Tottenham Conservation Area

- 7.52 The neglected and disused rear of the Site would be enhanced by the proposals with a high-quality development, achieving a radical and positive transformation to this part of the Conservation Area and its setting.
- 7.53 Similarly, the High Road frontage of the Site would be enhanced through improvements to the statutorily and locally listed buildings.
- 7.54 829 High Road is a remnant of the historic townscape on the High Road, representing the architectural form, proportional, scale and grain of one of the Victorian/Edwardian buildings on the High Road. As such, it makes a positive contribution to the character and appearance of the Conservation Area in this sense. The Heritage Statement concludes that the removal of the non-designated 829 High Road would cause a low degree of harm to the designated Conservation Area; however, the creation of a new archway entrance to define this space, opening of views along Brunswick Square into an active street, and better townscape legibility and integration would go some way towards compensating for this removal.
- 7.55 The Heritage Statement concludes that the benefits would decisively outweigh the harm arising, on balance, and that the residual position in relation to the Conservation Area is that no harm would arise.

Public Benefits and the Heritage Balance

- 7.56 The PPG describes public benefits as anything that delivers economic, social or environmental progress. They do not need to be heritage-specific benefits to form part of the overall heritage balance within the NPPF.
- 7.57 The public benefits in this case are significant and comprise:
- Responding to Haringey's acute housing needs including the delivery of affordable accommodation. This is of relevance given a lack of 5YHLS equating to c. 2,900 homes in Haringey, alongside national policy objectives to significantly boost the supply of new homes, including student homes.

- Creating a new, high-quality entranceway to Brunswick Square that opens views into a well-designed and active streetscape and is a significant improvement above the existing unattractive and unsafe alleyway. A radical transformation of the public space along Brunswick Square would be achieved that is fully accessible to the public.
- Achieving a better townscape legibility and integration of the wider site allocation.
- Making a meaningful contribution to the wider regeneration objectives for North Tottenham and Site Allocation NT5.
- Attracting new investment and visitors to North Tottenham. Annual spending by workers and student residents could be in the region of £1.3m, significantly boosting the local economy. The creation of new employment opportunities during the construction and operational phases, with opportunities for local recruitment and skills development.
- Acting as a catalyst for investment and further regeneration of Site Allocation NT5 and the wider area, redressing inequality and halting further decline in Tottenham without prejudicing other development in the vicinity.
- Secure the long-term future of the Grade II listed 819-821 High Road and the locally listed buildings at 823-827 High Road.
- Integrating the statutorily and locally listed buildings at 819-827 High Road within the development, better revealing their significance in the process and enhancing their overall appearance and setting within the Conservation Area.
- Complementing the ongoing regeneration of Tottenham that has taken place to the east, notably within the NDP and Northumberland Terrace.

7.58 The Heritage Statement concludes that the heritage-only benefits outweigh the low levels of harm arising to the relevant designated heritage assets. When considered cumulatively with the wider public benefits therefore, the proposals demonstrably outweigh the low level of heritage harm arising.

7.59 Accordingly, Paragraph 202 of the NPPF is satisfied, and the “*less than substantial*” heritage harm arising to the Grade II listed 819-829 High Road and the North Tottenham Conservation Area is outweighed by the public benefits arising.

7.60 The conclusions of the Heritage Statement mirror those which underpinned the extant planning permission at the Site (HGY/2021/2283). Notably, in approving this permission Conservation Officers noted (Officer Report P22):

“The proposed redevelopment together with the proposed refurbishment of the listed and locally listed buildings that significantly contribute to the street frontage of the Conservation Area, and the landscaped reconfiguration of Brunswick Square - would largely conserve the significance of the listed and locally listed buildings, would enhance the quality of this part of the Conservation Area and would significantly enhance the setting of both listed and locally listed buildings.

These heritage and public benefits would outweigh the low level of less than substantial harm to the significance of the Conservation Area resulting from the erection of new, larger buildings at the back of the High Road and the proposed demolition of the locally listed building at 829 High Road.”

7.61 Given the similarities of the extant and proposed scheme, alongside the conclusions of the enclosed Heritage Statement, the above Officer conclusions continue to apply.

Locally Listed Buildings (Non-designated Heritage Assets)

7.62 The NPPF (Para. 203) requires a balanced judgement to determine the impact of the proposals upon the non-designated heritage assets (i.e. the locally listed buildings).

7.63 The refurbishment and integration of 823-827 High Road into the scheme is a positive and would secure their long-term use as an integral part of the scheme. The removal of 829 High Road would, however, result in the loss of a non-designated heritage asset of some, although limited, heritage significance.

7.64 The enclosed Heritage Statement notes that the actual authenticity and heritage value of 829 High Road is limited, with little of any historic interest left and the building making a demonstrably “very low” contribution to the Conservation Area.

7.65 There are also considerable benefits arising from the removal of 829 High Road as summarised above, and the Heritage Statement concludes that there would be a residual low level of harm arising to the locally listed buildings, on balance. This harm would be outweighed by the benefits arising, including the creation of a new archway entrance to define this space; opening of views along Brunswick Square into an active street; and better townscape legibility and integration. Paragraph 203 of the NPPF is therefore satisfied.

Wider Policy Considerations

7.66 In meeting the NPPF requirements relative to both designated and non-designated heritage assets, it follows that the applicable Local Plan policies are also satisfied given:

- DMP DPD Policy DM9 supports the sensitive redevelopment of sites and building where they currently detract from the character and appearance of the Conservation Area and its setting.
- Policy AAP5 of the TAAP requires development to identify and positively respond to the distinctive character and significance of heritage assets and their settings, whilst balancing the need to sensitively facilitate neighbourhood regeneration and renewal. Opportunities to integrate heritage assets within new development and enhance connectivity between them should be maximised.
- LP Policy HC1 requires development to conserve the significance of heritage assets, by being sympathetic to their significance and surroundings.

7.67 The development also preserves listed buildings and their setting and preserves and enhances the character or appearance of the Conservation Area, addressing the statutory duty imposed by the Planning (Listed Buildings and Conservation Areas) Act 1990.

7.68 The application response positive to the Site’s historic context and is compliance with policy requirements at the national, London and local levels. They are, therefore, appropriate in heritage terms.

Design

- 7.69 The proposals have been informed by a thorough analysis of the surrounding context, the site requirements of NT5 and the principles of both the HRWMF and the Haringey Urban Character Study (February 2015).
- 7.70 A full description and analysis of the proposals is provided in the accompanying DAS, including how the proposals satisfy the Haringey Development Charter (as required by DM DPD Policy DM1).
- 7.71 Policy DM1 requires all new development to achieve a high standard of design and contribute to the distinctive character and amenity of the local area. The proposals have been subject to a design-led process and satisfy this requirement. The DAS explains the design response further, noting that a distinctive character is achieved and that the scheme adopted a materials palette that draws reference from the history of the local area.
- 7.72 The development steps up in height as it moves away from the High Road properties, consistent with the principles of the HRWMF and respecting the heritage context of the Site. The maximum height of the proposals was reduced, and subsequently agreed with Officers, during pre-application discussions as an appropriate scale for the buildings.
- 7.73 The application is supported by several CGIs which demonstrate the appropriateness of the scheme related to the local townscape.
- 7.74 Importantly, the proposals retain the design principles which were accepted as part of the extant scheme with the Design Officer concluding that:
- “The proposals are a well thought through and elegantly designed response to the site, that will play a part, along with other neighbouring sites also anticipated to be redeveloped, like this proposal in accordance with the adopted masterplan, as it continues to evolve, in accordance with changed priorities and conditions, to contribute to a more sustainable, viable, inclusive, and appealing North Tottenham community” (Officer Report to HGY/2021/2283, P22).*
- 7.75 The high-quality design and positive approach was reiterated through pre-application discussion concerning the enclosed proposals.

Open Space

- 7.76 Whilst the Site is within an area of open space deficiency, the site area (0.36ha) is below the threshold (1ha) whereby new publicly accessible space is required on-site (DM DPD Policy DM20), i.e. there is no prescribed standard applicable.
- 7.77 Notwithstanding this, the proposals still provide 836sqm of open space on-site including high-quality, publicly accessible open space along Brunswick Square.

Transport

- 7.78 Local Plan Policy SP7 seeks to locate public trip generating developments in accessible locations, adopting maximum car parking standards and car free housing wherever possible. Policy DM32 also supports this and seeks for the London Plan parking standards to be applied.
- 7.79 The Site is within an accessible location and well positioned to nearby railway stations and bus routes.
- 7.80 A car free development is proposed, consistent with London Plan Policy T6, with the exception of one accessible car parking space which satisfies Policy T6.5. This space would include an electric charging point.
- 7.81 A total of 237 cycle parking spaces would be provided which satisfies London Plan minimum requirements. All cycle parking would be designed to satisfy the London Cycle Design Standards.

Environmental Considerations

Daylight, Sunlight and Overshadowing

- 7.82 London Plan Policies D6 and D9 require new development to achieve sufficient daylight and sunlight to new and surrounding development. Local Plan Policy DM1 states that development proposals must ensure a high standard of privacy and amenity for users and neighbours of a development.
- 7.83 The enclosed Daylight and Sunlight Assessment confirms that the proposals will provide satisfactory living conditions for future occupiers and not cause unacceptable harm to daylight or sunlight to existing surrounding residential properties.

Flood Risk and Drainage

- 7.84 The London Plan (Policy SI13) states that developments should aim to achieve greenfield run-off rates and ensure that surface water is managed as close to its source as possible.
- 7.85 Local Plan Policy SP5 requires all development to be water efficient during construction and operation to reduce all forms of flood risk. Policies DM24, DM25 and DM29 continue the NPPF and London Plan approach to flood risk management and SuDS to ensure that all proposals do not increase the risk of flooding. Policy DM27 seeks to protect and improve the quality of groundwater.
- 7.86 The enclosed Flood Risk Assessment (FRA) confirms that the Site is entirely within Flood Zone 1, being an area at the lowest risk of flooding. The risk of flooding from tidal and fluvial sources is assessed as low.
- 7.87 Surface water drainage would discharge at a rate of 2.0 l/s which is in line with greenfield run off rates (2.03 l/s) and representing a significant improvement from existing rates. The reduction in surface water discharge rates will be achieved using SuDS, including permeable paving, tree pit attenuation along Brunswick Square, blue roof arrangements and storage beneath the podium public realm.

- 7.88 Overall, the FRA and Drainage Strategy demonstrate that the development has a low probability of flooding and will manage surface water sustainably, so that it is not exacerbated elsewhere. The proposals satisfy London Plan Policy SI13 and Local Plan Policies SP5, DM24, DM25, DM27 and DM29.

Air Quality

- 7.89 Local Plan policies DM4 and DM23 require development to consider air quality and be designed to improve or mitigate the impact on air quality for the occupiers and users of a scheme. Similarly, the London Plan (Policies GG3 and S1) seek to improve London's air quality and reduce public exposure to poor air quality. Policy S1 (part B) requires new development to achieve air quality neutral as a minimum.
- 7.90 The enclosed Air Quality Assessment confirms that the proposed development would not leave to any significant air quality effects, subject to mitigation measures during the construction phase.

Ecology

- 7.91 Policy GG2 of the London Plan promotes the creation of new green infrastructure and urban greening, including aiming to secure net biodiversity gains where possible. Policy G6 similarly requires proposals to manage impacts on biodiversity and aim to secure net biodiversity gain.
- 7.92 A Preliminary Ecological Appraisal supports the planning application and confirms that the Site offers little ecological value in its current form, being dominated by hardstanding and buildings. The proposed landscaping will mitigate the loss of the limited extent of semi-natural habitats on site and provide a net gain in trees, achieving an uplift above the existing baseline conditions for biodiversity.
- 7.93 The development aligns with policy across all levels and will provide an uplift in biodiversity value of the Site above its current position.

Noise and Vibration

- 7.94 London Plan Policy D14 requires proposals to avoid significant noise impacts. Local Plan Policy DM23 states that developments should not have a detrimental impact on air quality, noise or light pollution.
- 7.95 Policy D13 of the London Plan also addresses the Agent of Change principle, ensuring that proposals take account of surrounding operations and ensure that established noise and other nuisance-generating uses remain viable and can continue to operate without unreasonable restrictions being placed on them.
- 7.96 A Noise Assessment supports the planning application and confirms that the proposed development is suitable in terms of noise with appropriate mitigation, and that acoustic matters are not considered to represent any barrier to development. The above-mentioned policies are therefore satisfied.

Energy and Sustainability

- 7.97 Major development is required to be net zero carbon by the London Plan, achieving a minimum on-site reduction of at least 35% beyond Building Regulations (Policy SI2). Residential development should achieve 10%, and non-residential should achieve 15%, through energy efficient measures with any shortfall to be provided through either a cash in lieu contribution, or off-site via an appropriate proposal where delivery is certain.
- 7.98 Building Regulations were updated in 2021 and placed more challenging targets on non-residential uses. Recognising this, the GLA published guidance in November 2022 which recognises the challenge faced by non-residential uses in achieving significant on-site reduction beyond Part L. The guidance confirms that it is acceptable for non-residential uses to achieve less than the 35% reduction required by Policy SI2, providing that an alignment to the energy hierarchy to minimise emissions as far as possible is demonstrated.
- 7.99 The proposals are designed to connect to an emerging District Energy Network (DEN) which will be secured by a S106 Agreement. This would secure a 10% reduction beyond 2021 Part L Building Regulations. Should the DEN not be available or feasible for connection to the Site, on-site heat pumps would be utilised which raise this reduction to 16%. Cash in lieu contributions would accompany this reduction to achieve zero carbon overall.
- 7.100 In both scenarios, the submitted Sustainability and Energy Statement demonstrates how this is the maximum reduction in emissions possible when balancing the scheme requirements for thermal comfort, acoustics, daylighting and low carbon heating. The GLA guidance and London Plan Policy SI2 are therefore satisfied.
- 7.101 Although PBSA development is not ordinarily subject to BREEAM, the Applicant has committed to achieving a minimum of BREEAM 'Very Good' rating with an opportunity to achieve 'Excellent'. This satisfies Local Plan Policy SP4.
- 7.102 The proposed connection to the DN also satisfies Local Plan Policy DM22 (F).

Main Town Centre Uses

- 7.103 The extant consent was supported by a sequential assessment to justify the provision of a cinema only. As this use is no longer proposed, a sequential assessment is not required.
- 7.104 The proposed commercial uses are proportionate and complementary to the development in scale and supported by Site Allocation NT5. They would help to create a new mixed-use, residential neighbourhood.
- 7.105 The principle of complementary commercial uses is supported by policy. Indeed, Officers have previously confirmed that these uses are acceptable and do not require justification through the sequential assessment as a consequence.

Summary

- 7.106 This Section demonstrates that the proposals comply with the Development Plan and other material considerations, including the NPPF and various supplementary planning documents.

- 7.107 The proposals are design to complement the HRWMF and provide high-quality buildings to the rear of the High Road frontage, delivering much needed new homes and new open spaces.
- 7.108 Importantly, the scheme retains the design principles which have already been approved by through the extant scheme. They are an evolution of this planning permission with the principle change relating to an alternative form of residential accommodation.

8 Planning Obligations and CIL

- 8.1 This Section summarises the main legislation, policy and guidance underpinning planning obligations and the Community Infrastructure Levy (CIL).

National Legislation and Policy

Community Infrastructure Levy Regulations 2010 (as amended)

- 8.2 Regulation 122 states that a planning obligation may only constitute a reason for granting planning permission if the obligation is:
- a) necessary to make the development acceptable in planning terms;
 - b) directly related to the development; and
 - c) fairly and reasonable related in scale and kind to the development.

NPPF

- 8.3 Paragraph 57 of the NPPF repeats the above tests. Paragraph 55 notes that local planning authorities should consider whether otherwise unacceptable development could be made acceptable using conditions or planning obligations. Obligations should only be used where it is not possible to address unacceptable impacts through a planning condition.

London Plan

- 8.4 Policy DF1 states that proposals should provide the infrastructure to ensure that they are sustainable and to support the delivery of the London Plan. Policy T9 confirms that Mayoral CIL will secure funding towards strategic infrastructure such as Crossrail 2, and that S106 planning obligations will be sought to mitigate impacts from development. Such obligations may include the provision of new and improved public transport services, capacity and infrastructure; the expansion of the London-wide cycle networks and supporting infrastructure; and making streets pleasant environments for walking and socialising, in line with the Health Streets Approach.
- 8.5 Haringey lies within Mayoral CIL Charging Zone 2 of the Mayor's CIL Charging Schedule (MCIL2, adopted February 2019) where a charging rate of £60 per square applies, with exemptions for social housing and development by charities.

Local Policy and Guidance

- 8.6 LBH's CIL Charging Schedule was adopted in September 2022. The Site is located within the 'Eastern' area where the CIL liability is £85 per square metre for student development and nil for other proposed uses for the Site.
- 8.7 The LBH Planning Obligations SPD (March 2018) states that S106 Agreements will continue for obligations such as affordable housing, energy and sustainability, travel plans and on-site open space requirements.

Draft Heads of Terms

- 8.8 Table 9.1 below provides an initial schedule of potential financial and non-financial obligations arising from the proposed development, having regard to the LBH Planning Obligations SPD and relevant policy and guidance at the national, London and local levels.

Table 8.1: Proposed Indicative Planning Obligations

Topic	Proposed Contribution	
	Non-Financial	Financial
Affordable Student Accommodation	On-site affordable housing.	n/a
Local Employment & Training	Construction Phase – to enter into a Local Training and Employment Plan.	n/a
Open & Amenity Space	Provided on-site.	n/a
Transport & Highways	S278 highways works to deliver any off-site highways works.	Travel Plan – only if measures are included within the Travel Plan.
Environmental Sustainability	Measures to be provided to meet standards on-site.	Carbon offset payments.
Telecommunications	Broadband connectivity designed into development.	n/a
Monitoring	n/a.	Financial sum TBC.
District Energy Network (DEN) Connection	Connection to DEN safeguarded.	n/a
Considerate Contractors Scheme	Commitment to the Considerate Contractors Scheme as part of the Construction Management Plan.	n/a

- 8.9 The above is intended to form the basis of subsequent discussions and negotiations with the LBH. It is important, however, that the application is considered on its own merits and against policies which require consideration of the deliverability of the proposals as a whole.
- 8.10 There are several scheme-specific proposals that must be considered in determining a proportionate and reasonable set of planning obligations in this case. These include, amongst others, the inclusion of new private amenity space and the renovation and conversion of a Grade II listed building.

9 Conclusions

- 9.1 This Planning Statement supports an application for full planning and LBC permission for the comprehensive redevelopment of the Printworks site for PBSA and supporting commercial uses.
- 9.2 The proposals would deliver 287 new student bedspaces including a policy compliant 35% provision of affordable student accommodation. As confirmed by the London Plan, this would equate to a contribution towards Haringey's housing needs of 114.8 homes, which is notable given the Council's failure to demonstrate a 5YHLS equating to c. 2,900 homes.
- 9.3 The Site is in the Upper Lee Valley Opportunity Area, a Growth Area and a specific site allocation (reference NT5) where major residential-led development is supported.
- 9.4 The proposals are appropriate in all development management matters and comply with the relevant planning policies of the Development Plan and other material considerations. They adopt the relevant principles of the HRWMF and would act as a catalyst for regeneration of the High Road West area, being a key interface site between the High Road frontage and remainder of the masterplan area.
- 9.5 Therefore, the proposals redevelop an underutilised site and optimise its development potential through a design-led approach. They meet the regeneration aims for the area and accord with the requirements of the NPPF and Development Plan.



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