



London Healthy Urban Development Unit

18th October 2023

Your ref: HGY/2023/2306

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Dear Phillip,

HGY/2023/2306 - The Printworks

Full planning application for the demolition of existing buildings and structures to the rear of 819-829 High Road; the demolition of 829 High Road; and redevelopment for purpose-built student accommodation (Sui Generis) and supporting flexible commercial, business and service uses (Class E), hard and soft landscaping, parking, and associated works. To include the change of use of 819-827 High Road to student accommodation (Sui Generis) and commercial, business and service (Class E) uses.

HUDU Response to Haringey Planning Application

Haringey GPs, acute and mental healthcare services are under substantial pressure with limited space and recruiting additional clinicians, e.g., pharmacists and physiotherapists, to provide enhanced services to local people. This is a particular concern in the North Tottenham Area. To meet the health needs of the new residents of the proposed schemes, and to limit adverse impacts on existing residents, developments need to provide financial contributions via the relevant S106 agreement for the expansion of health infrastructure serving the locality.

The site lies within the High Road West area allocated as site NT5 in the Tottenham Area Action Plan (2017). The High Road West Masterplan Framework (2014) acknowledges that additional healthcare provision is needed in the area, particularly primary care services.

The site benefits from an extant planning application to provide 72 new homes, a cinema and supporting commercial units. The HUDU Planning Contributions Model calculated a primary healthcare requirement of £35, 845 for this development. This took into account that the two closest GP practices (Tottenham Health Centre and Somerset Gardens Family Health Centre have no surplus capacity as measured by the ratio of FTE GPs per registered patients which is above the standard benchmark). Acute and mental health services were excluded from this calculation.

The ICB have been in discussions regarding the re-provision of Tottenham Health Centre and note that this forms part of the High Road West regeneration plans. In addition to this there is scope for extended or improved services at the Somerset Family Health Centre. It is also noted that the Lordship Lane Health Centre, which provides sexual health services, is less than a ten minute walk to the site which would provide services to the new population.

The NHS Long Term Plan (2019) and the Fuller Stocktake Report (2022) re-emphasise the importance of providing care close to the community and to provide services on a neighbourhood basis where possible. This means in addition to increasing and improving primary capacity NHS Trusts are seeking to provide increased facilities and services locally where appropriate. The HUDU Planning Contributions Model, as set out in the 2021 London Plan, is required to be used to calculate the cost of mitigation for health. (please note that the HUDU Model does not currently incorporate the impact on Accident and Emergency and outpatient infrastructure nor the impact on the London Ambulance Service and therefore underestimates the cost of mitigation to the NHS).

The current scheme consists of 287 student bedspaces consisting of 222 cluster bedrooms and 54 studios in a new build block and 9 cluster bedrooms and 2 studios in the existing buildings.

The benefits of the scheme are recognised and supported including the delivery of student accommodation across London including affordable units and the enhancement of the green spaces.

It is noted that the previous application was determined on the basis that Haringey's Planning Obligations SPD and Annual Infrastructure Funding Statement suggests that health obligations are available through Strategic CIL rather than S106 payments and therefore no S106 contribution was secured. It is also noted that the latest CIL charging schedule has increased the amount of CIL from £15 per square metre to £85. Whilst health and wellbeing facilities are included on the Strategic Community Infrastructure Levy Infrastructure List, the list is indicative and there is no guarantee that CIL receipts will be allocated towards health infrastructure in north Tottenham to mitigate the direct impact of development. Therefore HUDU maintain that a s106 payment is required.

The HUDU Planning Contributions Model has been used to calculate the contribution. The requirement would meet the tests in CIL Regulation 122 as it is considered necessary, reasonable and directly related to the development.

It should be noted that the HUDU model has been updated since the previous comments on the scheme to take account changes in costs of construction and other assumptions. Also it is noted that the previous request the focus was on primary care only. Following the pandemic there has been significant pressure on hospital and acute services, including mental health, and therefore mitigation from development is considered to be necessary.

We have run the HUDU model for this based on 287 additional residents which assumes that the students will not be local. The standard assumptions in regards to age have been

modified to take into account the fact that the majority of students will be in a younger age bracket (15-44). The final summary information from the HUDU model is set out below.

Final Summary	
Total Capital Cost	£303,060
Total Revenue Cost	£236,634
Combined Cost	£539,694
Total Number of Housing Units	287
Capital Cost Requirement Per Unit	£1,056

The HUDU Planning Contributions Model calculates a total healthcare (primary, acute and mental health) capital s106 requirement of £303,060

This shows an overall capital cost of £303,060 with a further revenue cost of £236,634.

It is noted that the assumptions used in the model regarding the age profile and the use of local services by students who may continue to remain registered with doctors outside of Haringey, may lead to an inflated overall figure. Also, the age range of students will also likely result in more use of digital services. Funding for extra provision will be available as part of the High Road West development. Discussions with the NHS Trusts and the ICB indicate that expansion of existing sites should be possible and therefore we have reduced the capital cost of mitigation by 50% to **£151,530**.

At this stage we are not asking developers to cover the additional revenue costs. However, they should be made aware that there are significant pressures and costs on the NHS of development.

The request is the Council to secure **£151,530** within the S106 agreement to be paid on commencement and indexed linked to building costs.

It is however, noted that the viability assessment to support the latest charging schedule suggests that £20/sqm should be allotted to s106 contributions. The gross internal floor area gained (including change of use) is 8857sqm which when multiplied by 20 = £177,140.00. This would be the total amount that would be expected to be sought on top of CIL. As it is understood that there are further contributions to be sought for the development which would potentially raise the level of contributions above this amount. In light of this HUDU would welcome the opportunity to be kept informed of any negotiations regarding viability and would strongly suggest that, if the full required contribution cannot viably be sought through a s106 contribution primary care is prioritised and this is highlighted in any future meetings regarding CIL spending.

Other points related to health are summarised below:

Standard of Accommodation

The Design and Access Statement submitted with the proposal states that the cluster bedrooms would be a minimum of 12.5sqm in size and each would contain an en-suite

bathroom. This exceeds the standard for single occupancy and is welcomed. It is stated that up to 12 rooms may be included within a cluster sharing a kitchen. It is suggested that this ratio should be re-considered and a lower number of students per kitchen would offer a greater standard of accommodation.

The standard and premium studios proposed do not meet the floorspace requirement of policy D6 of the London Plan. However, as student accommodation is occupied on a temporary basis, and it would be expected that the living accommodation is not utilised as much during daylight hours as residential flats for other purposes this could be acceptable. A condition would be recommended to ensure that each unit of accommodation is only occupied by one student.

It is noted that the Daylight and Sunlight assessment does not comply with the minimum standards for all the rooms. This again could be relaxed due to the nature of student accommodation.

Transport

The accommodation is proposed to be car-free which is welcomed. There are accessible pedestrian accesses and bus stops on the High Road, White Hart Lane and Northumberland Park to serve the development.

237 cycle spaces are proposed, which although less than the number of students proposed to occupy the units is likely to be sufficient to encourage and promote cycling as a means of transport for the students.

Further advice should be sought from the Local Authority Transport colleagues.

Green Spaces

A courtyard garden is proposed in the centre of the main body of amenity accommodation with a planting strategy to provide an attractive environment. Consideration should be given to securing a management plan for the landscaping area enforceable as a condition. There is also a potential for food planting for the occupiers of the building which could be pursued.

I trust that the above comments are useful in pursuing the application. However, please contact me if you require any clarification or if I can be of further assistance. We would request that we are consulted on any further amendments to the scheme which may effect primary and acute care provision and on any subsequent planning applications on the site and, as stated above, would welcome any involvement regarding the negotiation of the s106 contribution.

Yours Sincerely

F McElwain

Faye McElwain MRTPI

HUDU (Healthy Urban Development Unit) Planning Officer