

184 Tottenham Lane

Crouch End, N8 8SG



Planning Statement

August 2026



Executive Summary

This Statement is submitted in support of a planning application by YMCA London City and North (“the Applicant”) for the demolition of the existing building and erection of a new, improved hostel facility at 184 Tottenham Lane, Crouch End, N8 8SG, that will deliver much needed, modern hostel in the London Borough of Haringey (“LBH”).

The Site comprises the existing YMCA hostel building fronting Tottenham Lane between Rosebery Gardens and Elmfield Avenue, providing safe and stable accommodation to 155 young people aged 16 to 35 years with pressing housing needs.

The existing accommodation is no longer fit for purpose and does not meet the statutory requirements. The application is put forward by YMCA London City and North, who are committed to delivering a modern hostel facility that aligns with current best-practice standards, increasing the number of bed spaces from 155 to 174.

This Planning Statement provides an overview of the key planning issues for the project and sets out why the proposals are considered appropriate, including:

- The Site comprises an existing hostel which is no longer fit for purpose, and the proposed redevelopment will deliver **modern, best-practice** temporary accommodation for vulnerable young people, increasing the number of bedspaces from 155 to 174 to meet the growing need.
- The Site is **well-connected**, with a reasonable PTAL score of 3 (‘Good’), and is in an area well-served by a range of social community infrastructure and open space. It is a sustainable location for development.
- The proposals will increase the number of bed spaces from 155 to 174, delivering modern hostels aligned with current best-practice standards.
- The proposal will improve the urban fabric at this part of the local area, **contributing positively to the townscape**. The proposed scale and high-quality design will

enhance local character.

- An energy-efficient development that includes a range of active and passive design measures, together with PV panels, to **reduce CO2 emissions**.
- The proposed development has been designed to reduce reliance on cars and will promote sustainable travel and be pedestrian- and cyclist-friendly.

The principle of development is strongly supported in planning terms and the public benefits of the proposed development are clearly evident and should be attributed significant weight when determining the application. Furthermore, the benefits of the current proposals are significantly greater than the present use of the site, which is a material consideration when considering the relative impacts of the development.

Contents

1. Introduction	4
2. Site and Local Context	7
3. The Application Proposals	14
4. Planning Policy Context	22
5. Planning Assessment	25
6. Summary and Conclusions	69



1. Introduction

- 1.1. This Statement has been prepared by CMA Planning Ltd (“CMA”) in support of a planning application by YMCA London City and North (“the Applicant”) for the redevelopment of 184 Tottenham Lane, Crouch End, N8 8SG (“the Site”) in the London Borough of Haringey (“LBH”).
- 1.2. The Site is located at the junction of Elmfield Avenue, Rosebery Gardens and Tottenham Lane in Crouch End, adjacent to the designated Crouch End District Centre, in a highly accessible area that is identified as a focal point for growth by planning policy at all levels.
- 1.3. The Site extends to 0.204 hectares, with the existing YMCA hostel building on Site ranging from four to five storeys in height and comprises 155 bedspaces for young people. However, the existing building is aging and no longer meets the needs of its residents. The redevelopment represents a once in a generation opportunity that will shape the lives of 13,000 homeless experienced young people over the next 60 years.
- 1.4. The proposals are being put forward by YMCA London City and North, with a vision for the site to deliver a modern hostel where young people can achieve, contribute and thrive in the safety and knowledge of value-based support
- 1.5. Specifically, the application seeks full planning permission for:

“Demolition of the existing building and erection of a new, improved hostel facility with ancillary office, training and communal facilities within a part four to part six storey building.”
- 1.6. The proposed scheme has been sensitively designed in response to a detailed analysis of the Site and local context, taking into account the local townscape. Furthermore, the proposals have been the subject of pre-application discussions with the Local Planning Authority (LPA) and consultation with local residents and stakeholders, who have helped to inform the proposed scheme.

Purpose and Structure

- 1.7. All proposals take place within the context of national, regional and local planning policy and recognised best practice. For the reasons set out in this Statement, the proposals represent an appropriate form of development of the site which would deliver much needed new housing in a sustainable manner, without prejudicing the character of the existing building on the Site or the adjacent buildings and townscape.
- 1.8. This Statement is structured as follows:
- **Section 2** provides a description of the site and local context
 - **Section 3** provides details of the planning history of the site
 - **Section 4** provides an overview of the application proposals;
 - **Section 5** sets out the relevant planning policy context for the project;
 - **Section 6** considers the key planning issues associated with the development; and
 - **Section 7** sets out our summary and conclusions.

Other Supporting Documents

- 1.9. This Statement forms part of a series of reports submitted in support of the application and should be read in conjunction with these other documents, which include:
- **Application forms and notices** – CMA
 - **Planning Statement (this document)** – CMA
 - **Application drawings** – Levitt Bernstein Architects (“LBA”)
 - **Air Quality Assessment** – GEM
 - **Basement Impact Assessment** – Ground and Water
 - **Biodiversity Net Gain Report**– PJC
 - **Circular Economy Statement** – PRL
 - **Outline Construction Logistics Plan** – Velocity
 - **Daylight, Sunlight & Overshadowing Assessment** - XCO2
 - **Design and Access Statement (with Landscape / UGF details)** – LBA
 - **Energy Statement (with Overheating Assessment)** – XCO2

- **Fire Statement** – TOGA
- **Flood Risk Assessment** – Pell Frischmann
- **Health Impact Assessment** – Greenage
- **Equalities Impact Assessment** – Greenage
- **Heritage and Townscape Visual Impact Assessment (HTVIA)** – Icen
- **Housing Management Plan** – YMCA London City and North
- **Noise Impact Assessment** – KP Acoustic
- **Phase 1 Desk Study** – Ground and Water
- **Phase 2 Survey** – Ground and Water
- **Preliminary Ecological Appraisal** – PJC
- **Social Impact Plan** – YMCA London City and North
- **Statement of Community Involvement** – Altair
- **Sustainable Drainage Report** – Pell Frischman
- **Sustainability Statement** -PRL
- **Transport Statement** – Velocity
- **Travel Plan** – Velocity
- **Tree Survey** – PJC
- **Operational Waste Management Strategy** – Velocity
- **Outline Site Waste Management Plan** – Velocity
- **Whole Life Carbon Assessment** – PRL
- **Wind and Microclimate Analysis Report** – XC02
- **Wastewater Utilities Assessment** – Tetra Tech

2. Site and Local Context

- 2.1. A full description of the Site and surrounding area is provided in the Design & Access Statement (DAS), prepared by LBA, including a detailed analysis of the local context which has been a key consideration in formulating the application proposals.

The application site

- 2.2. The Site is located at the junction of Elmfield Avenue, Rosebery Gardens and Tottenham Lane in Crouch End, adjacent to the designated Crouch End District Centre.
- 2.3. The Site extends to 0.204 hectare and the existing YMCA hostel building on Site ranges from four to five storeys in height and comprises 155 bedspaces for young people. The Site currently also includes a commercial gym, run by the YMCA, located within the existing two-storey building on Elmfield Avenue.

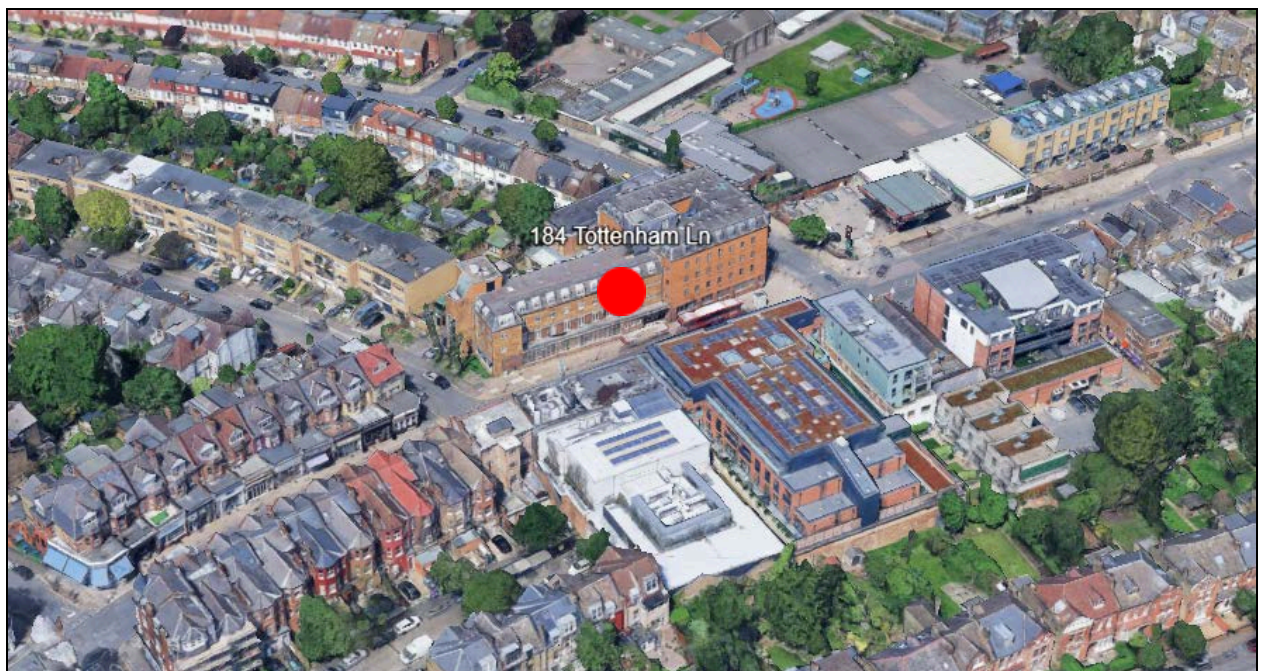


Figure 2.1 : Overview of the site and the surroundings

The local area

- 2.4. The Site is located at the junction of Elmfield Avenue, Rosebery Gardens and Tottenham Lane in Crouch End, adjacent to the designated Crouch End District Centre, which forms a focal point for local activity. The surrounding area is characterised by a mixed urban grain with Elmfield Avenue and Rosebery Gardens predominantly residential in character and Tottenham Lane functioning as a high street. A defining feature of Tottenham Lane is the mixed-use development with active ground floor frontages and articulation of buildings through increased height.

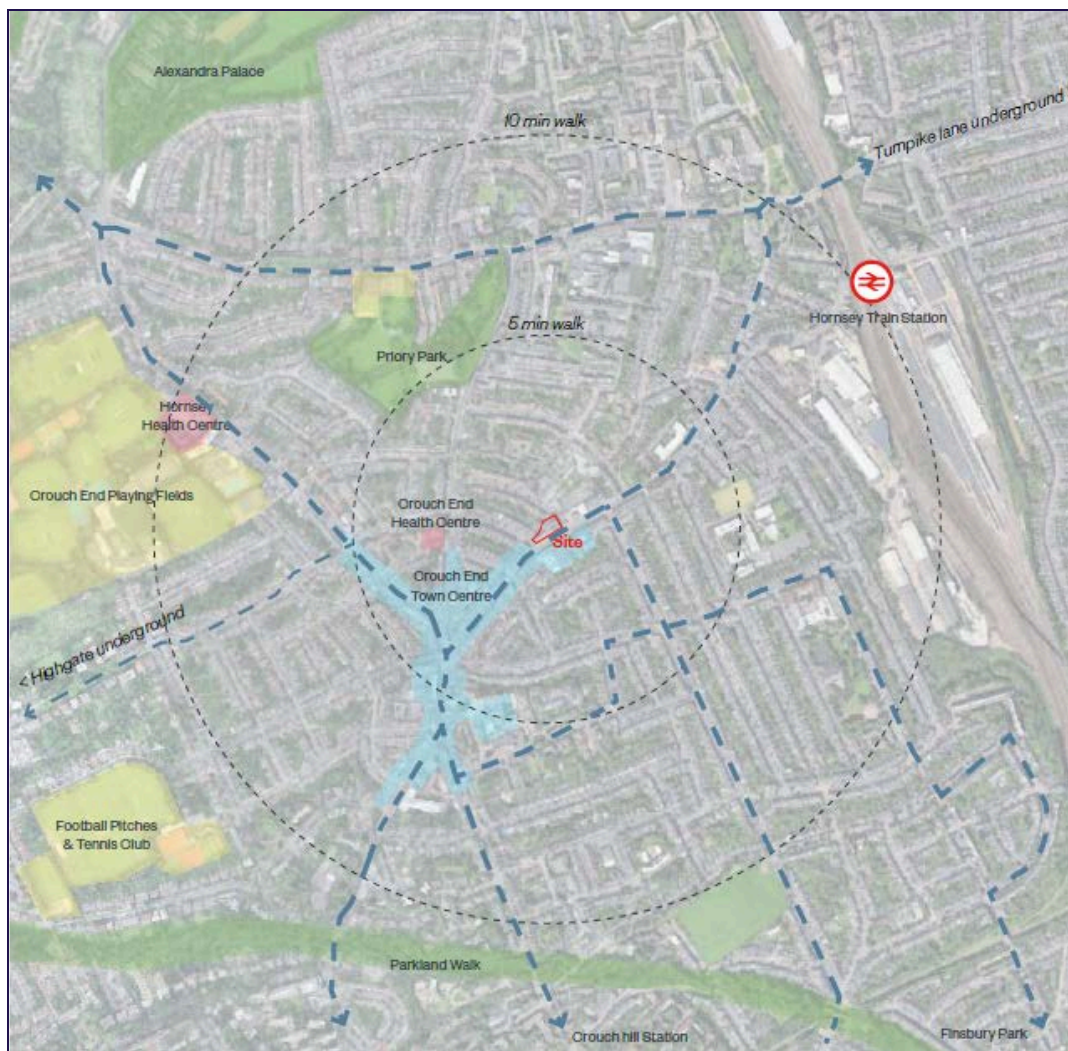


Figure 2.2 : Site location

Heritage

- 2.5. As set out in the HTVIA submitted with the application, the Site is not located within a conservation area and does not fall within any Archaeological Priority Area.
- 2.6. Crouch End Conservation is located to the further south and west of the Site.
- 2.7. There are no statutorily listed buildings on the Site. The nearest statutorily listed building is the Grade II* listed The Queen's Public House, located 120 metres southwest of the Site, as illustrated in Figure 2.3 below:

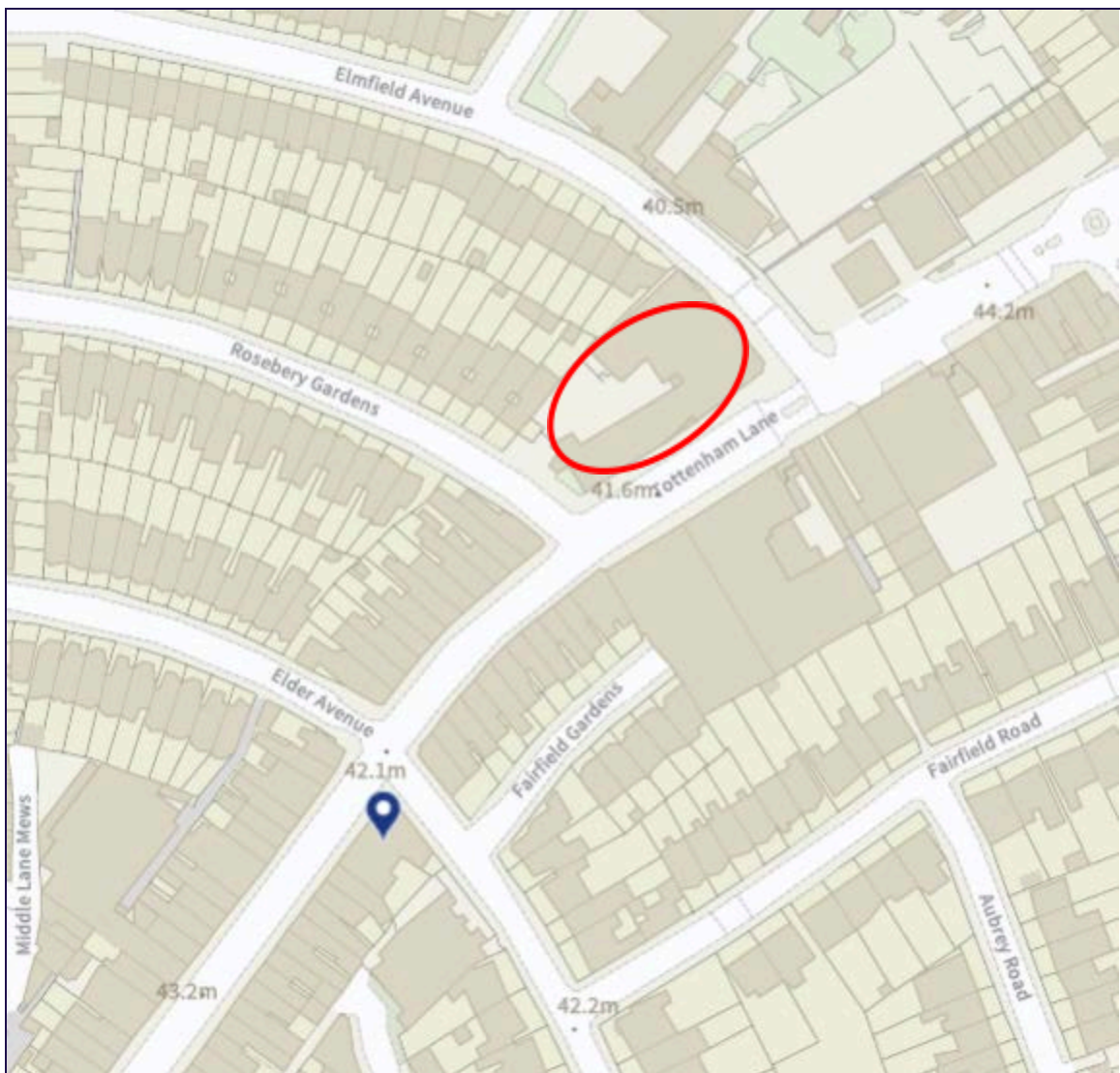


Figure 2.3 : Heritage Asset Map (Source: Historic England)

Transport and Accessibility

- 2.8. As set out in the Transport Statement by Velocity, the Site benefits from a good level of access to a wide range of public transport services, being located an 11 minutes walk from Hornsey railway station which is served by the Great Northern railway, connecting the Site to Moorgate and central London. There are a total of 6 bus routes operating along Tottenham Lane and Middle Lane, including nos. 41, 91, N41, N91, W3 and W5.
- 2.9. As a result of this, the Site has a reasonable Public Transport Accessibility Level ("PTAL") rating of 3 ("Good").

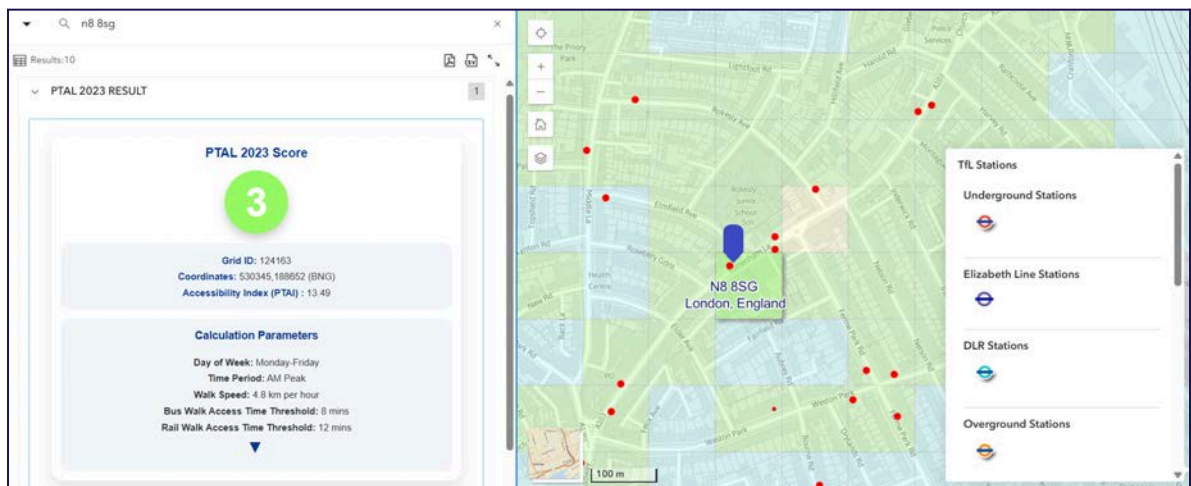


Figure 2.4 : TFL WebCAT PTAL Mapping Tool Extract

Flood Risk and Drainage

- 2.10. As illustrated in the extract from the Government's Flood Map for planning, the Site is located within Flood Zone 1, which covers land categorised as being at a low risk of flooding from rivers or the sea (with less than a 1 in 1,000 or 0.1% annual probability of flooding from rivers or the sea).
- 2.11. The Site is located within a Critical Drainage Area.

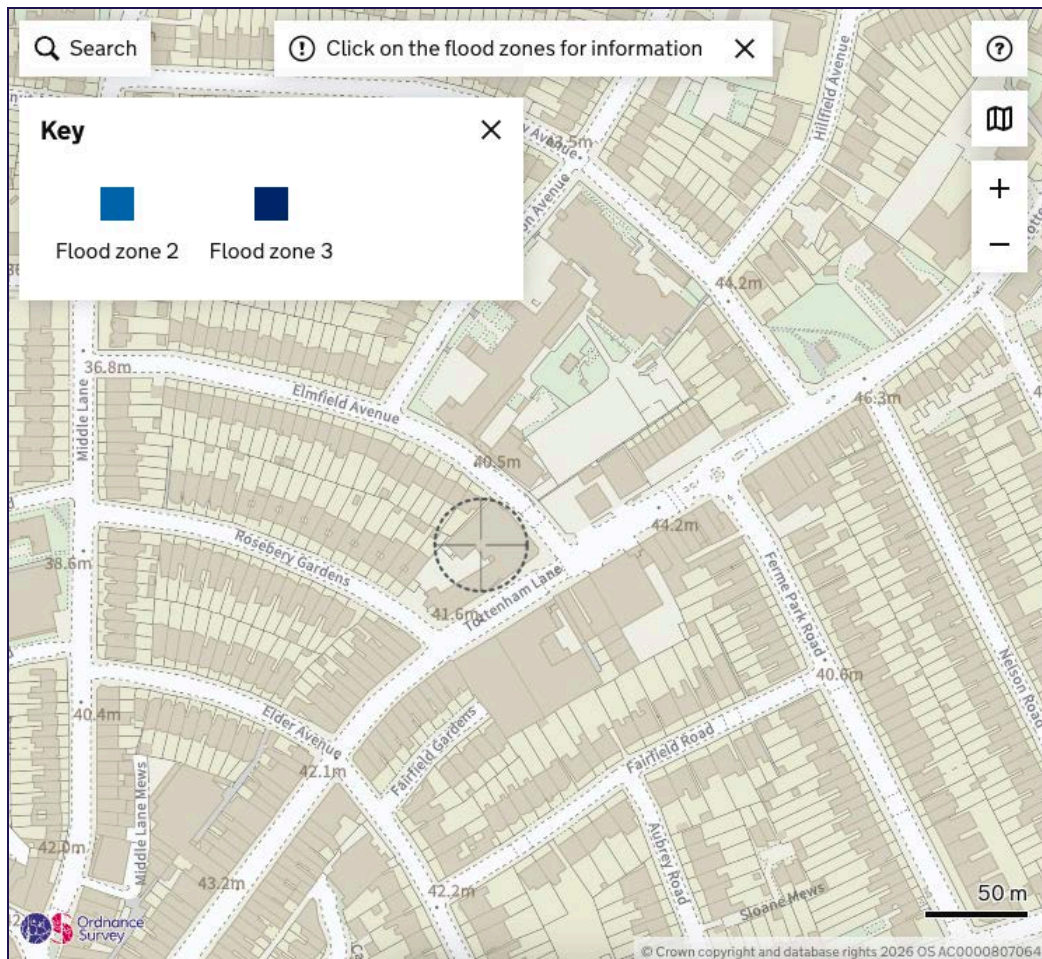


Figure 2.5 : Flood map (source: Environment Agency)

- 2.12. Further details are available within the Flood Risk Assessment by PFL submitted with the application.

Planning History - The Application Site

- 2.13. The Council's online planning register reveals a number of planning records for the Site, as described below:

Planning Ref.	Proposals	Results
HGY/2026/0487	Provision of a flue to the existing building on southwest elevation	Withdrawn
HGY/2017/0190	The installation of 3no. antennas upon free standing support frames upon the roof of the building. There will also be 3no. 300mm transmission dishes, together with 1no. radio equipment cabinets of less than 2.5 cubic metres and ancillary development thereto (Notification under the electronic communications code regulations 2003 to utilise Permitted Development Rights)	Unknown
HGY/2016/2839	Display of 1 x internally-illuminated LED Screen sign mounted in stainless steel Telephone Kiosk	Refused 29/09/2016
HGY/2016/0127	Removal of projecting box to front elevation and replacement with a new window, removal of balustrade to roof in lieu of guard rail system, minor amendments to ground floor railings and new canopy over entrance.	Approved 08/03/2016
HGY/2001/1182	Installation of telecommunication equipment cabinet. (Part 24 Determination)	Withdrawn
HGY/2001/0798	The siting and appearance of a new 3G equipment cabin to house electronic equipment.	Approved 30/07/2001
HGY/1999/1036	Development Order 1995). (Part 24 of Town & Country Planning - General Permitted 1999, to include one dish antenna and two cross polar antennas Amendment to planning approval HGY/56698.	Approved 10/09/2012

HGY/1999/0629	(Part 24 of Town and Country Planning Permitted Development) (General Erection of MPC midi cabin and associated MPC antenna equipment and dishesOrder 1995).	Approved 13/07/1999
HGY/1999/0316	Construction of telecommunications base station with 6 outdoor cabinets on concrete base and malcoe electrical meter cabinet with 3 panel roof antennas and associated anchor mast.	Approved 20/04/1999
HGY/1998/1346	Erection of three cross polar antennas, four dish antennas and one radio equipment housing building.	Approved 24/11/1998
HGY/1997/0920	The installation of 2.5m stub mast, 6 sector antennae, one 600mm microwave dish, equipment cabin and ancillary development.	Approved 19/08/1997
HGY/1996/0427	Erection of rear/side ground floor extension to enlarge fitness suite and to provision of lift to provide disabled access.	Approved 27/08/1996
OLD/1986/1617	12/12/85 Erection of a portacabin at rear.	Approved 30/01/1986

3. The Application Proposals

Project Overview

3.1. A detailed description of the proposed development is provided in the Design and Access Statement by Levitt Bernstein which supports the application.

3.2. In summary, the application seeks permission for:

“Demolition of the existing building and erection of a new, improved hostel facility with ancillary office, training and communal facilities within a part four to part six storey building. ”

3.3. The proposal has been informed by the planning policy requirement to optimise development outputs by delivering much-needed temporary accommodation in an accessible neighbourhood.

3.4. The proposed development would redevelop the existing hostel to deliver a modern hostel facility that aligns with current best-practice standards. The scheme will deliver 174 bedspaces, an increase of 19 additional bedspaces, including 10% accessible accommodation and 14% larger move-on flats. As such, the proposed development will help deliver some of these on-demand temporary accommodation for the housing system in London which is facing unprecedented pressure with youth homelessness.

3.5. The proposed development will provide new shared flats with shared kitchens and ensuite bedrooms, alongside shared living and outdoor spaces, space for learning, training and support. The rooms and living spaces are generous in area and meet or exceed the statutory minimum areas as set out in both the London Plan and supplementary planning guidance.

Building Form and Massing

- 3.6. The scheme has been sensitively designed to ensure that the proposed scale, massing and height are reflective of the surrounding built form and would significantly enhance the appearance of this part of the area.
- 3.7. As shown below, the proposals introduce a five-storey frontage (with set back top floor) along Tottenham Lane, with an additional storey accommodating plant integrated within a mansard roof at the corner of Tottenham Lane and Elmfield Avenue, reinforcing the established pattern along the high street of marking key buildings through increased height. To respond sensitively to the surrounding context, the massing steps down along Rosebery Gardens and Elmfield Avenue to align with the more modest scale of the adjacent residential properties.



- 3.8. The proposed orientation and layout has been designed to maximise solar input and external amenity space for future residents and optimising local views.
- 3.9. The design has evolved through extensive pre-application engagement with the local planning authority. The end flank has been narrowed with roof plant screened from view,

and the skyroom raised to align with the mansard windows above so it reads as less subservient within the composition. The building's entrance position was also rearranged to a central location compared to the originally proposed south-eastern corner, as agreed with officers during pre-application discussions.

Facades and Materials

- 3.10. The architecture of the building draws upon the local character and materiality of the surrounding high street, which is defined by a cohesive mix of Victorian and contemporary buildings. The existing YMCA building lacks the vertical and horizontal articulation and material richness that results in a poor relationship with the streetscape.
- 3.11. The proposed design, therefore, responds by reintroducing a contrasting material palette to better relate to the local context.
- 3.12. At lower levels, the ground floor is expressed in maroon glazed brick, referencing the glazed brickwork along Crouch End's high streets. This horizontal, active expression continues the established high street rhythm, with a raised band of brickwork aligned to window sill height and a raised ground-floor sill, softening the building's edge and improving its interface with the public realm.
- 3.13. From upper floors, the façade is predominantly expressed in red brick with white brick piers, articulated through paired windows and a stacked soldier coursing detail above the windows to emphasise verticality, with precast concrete banding at each floor level providing a further horizontal datum that responds to the high street context.
- 3.14. The roof form takes cues from the tiled roofs of neighbouring buildings, using familiar pitches and mansard profiles with metal dormer windows to break up the roofline and reduce perceived massing. Contemporary stainless steel shingle cladding is proposed to the roof, providing a sympathetic contemporary reference to the surrounding tiled roofscape, with the shingles wrapped down around the central dormer to help break the building's mass and subtly define the entrance.

- 3.15. The entrance itself is marked by a vertical glazed slot framed by white brickwork, with YMCA signage incorporated above the doors, creating a clear and legible point of arrival onto Tottenham Lane.

Energy and Sustainability

- 3.16. The proposals have been designed in response to the London Plan Energy Hierarchy: Be Lean, Be Clean, Be Green, and achieve an estimated on-site regulated CO2 savings of 7.8 tonnes, which equates to a significant 28% savings against the baseline CO2 emissions. In order to meet the Zero Carbon target, and in accordance with policy requirements, a carbon offset payment would be provided.
- 3.17. Some of the key sustainable design and construction measures incorporated in the proposals are summarised below:
- Reuse of previously developed land;
 - Efficient design of the proposed massing, openings and internal layouts for adequate daylight and sunlight levels;
 - Energy and Water consumption will be reduced below Building Regulations;
 - Specification of water efficient fittings to limit water consumption to less than 105 litres per person per day;
 - Maximisation of energy and carbon dioxide emission reduction following the energy hierarchy through enhanced building fabric, high performance glazing with low G-values, low air permeability, energy efficient LED lighting, mechanical ventilation with heat recovery MVHR), and air source heat pumps (ASHPs);
 - Integration of renewable technology for additional carbon reduction on site in the form of photovoltaic panels;
 - Provision of adequate cycling storage space to encourage sustainability transport;
 - Site-specific SuDS will be implemented to reduce flood risk associated with surface water run-off;
 - The development will take measures to reduce waste and pollution on site during construction and operation and provide adequate waste and recycling storage; and

- Maximising and enhancing ecology and biodiversity on site with associated landscaping on communal amenity spaces throughout the site and introducing a garden courtyard.

Urban Greening and Biodiversity

- 3.18. The proposals incorporate a series of urban greening elements as part of the landscaping scheme, focused principally on a landscaped courtyard at ground floor level, with further greening proposed to the street frontages. The scheme introduces a rain garden, retained and replacement tree planting, and a range of pollinator-friendly herbaceous and shrub planting, together with permeable paving to support sustainable drainage (see Figure 3.1 below).



Figure 3.1 : Illustrative landscape plan

Car and Cycle Parking

- 3.19. In accordance with overarching sustainable transport objectives and adopted policy requirements, only one standard parking bay and one wheelchair accessible parking bay are proposed. The proposed standard parking bay will be used by staff and operational and delivery use of the proposed building and the accessible parking bay is saved for blue-badge.
- 3.20. The proposed development seeks to create a healthy environment for future residents and visitors and seeks to actively encourage sustainable modes of transport, and in particular, cycling. Cycle parking within the Site has been designed in accordance with TfL's London Cycle Design Standards (LCDS). The design provides a total of 58 no. long-stay spaces and 4 no. short-stay spaces are proposed for future residents, staff and visitors, together with one mobility scooter space. 5 further short-spaces are provided by the existing short stay parking located adjacent to the site.
- 3.21. The long-stay cycle parking spaces are proposed within the ground floor of the proposed building and can be accessed via the entrance from Rosebery Gardens.

Health Impact

- 3.22. A Health Impact Assessment has been carried out by Greengage to assess the proposed development against the NHS Healthy Urban Planning Checklist. This sets out the mitigation and recommendations for any negative impacts and positive outcomes to ensure the proposals will provide a positive health impact to existing and future residents, staff and the local neighbours.
- 3.23. The benefits from the scheme can be summarise as below:
- Delivery of 174 en-suite bedrooms for 16-35 year olds, which equates to a 12% increase in rooms on Site, and includes 37 shared clusters around shared kitchen;
 - Creating 231 full-time equivalent construction jobs;

- Car-free development; and
- Delivery of new flexible, accessible open space with SuDS, including rain gardens, resulting in a 14.5% biodiversity net gain.

Pre-Application Consultation

- 3.24. The application scheme is the product of extensive discussions with the local planning authority and key stakeholders since August 2025, reflecting the Applicant's commitment to work in a genuinely collaborative way and to deliver a scheme that reflects the Council's comments.
- 3.25. Five pre-application meetings were held with LBH's planning, urban design and conservation team between August 2025 and May 2026, supplemented by a Quality Review Panel and a Secured by Design meeting with the Met Police. The proposed scheme has also engaged with existing residents, staff and the wider community.
- 3.26. As detailed in the Design and Access Statement and the Statement of Community Involvement (SCI) submitted with the application, the proposals have been subject to pre-application engagement since August 2025. At the initial meeting, the Council confirmed its support in principle for redevelopment of the existing hostel, and considered the emerging height and massing to be broadly achievable subject to detailed design quality. In direct response to feedback received, including concerns regarding the prominence of rooftop plant against the skyline, the proposed transition in scale towards the two-storey houses on Elmfield Avenue, and a lack of a clearly defined top and vertical rhythm to the elevations, the final design was revised to reduce the bulk and width of the taller corner element by introducing a more vertically-expressed form, and conceal mechanical plant within a mansard roof.
- 3.27. Following these changes, a further pre-application meeting was held on 7th January 2026 to address Officer comments on the building's main entrance, including whether it should remain in its current location or be relocated to the original south-eastern corner of the site. It was agreed that a central entrance was acceptable, provided the façade above it was further developed to give it an appropriate sense of arrival. This progress was

reviewed at the fourth pre-application meeting on 26th March, with refined corner detailing alongside window and banding details to better integrate solar shading in accordance with the relevant policies.

- 3.28. The final full pre-application meeting took place on 5th May and focused on the detailed elevation design, including the proportion of brick piers between window bays, the treatment of the roof at the southern corner, and the design of windows facing the adjacent school, which have been incorporated into the final design. The proposed development has therefore been developed in response to feedback received from the LPA, and reflects a genuinely collaborative approach to securing a high-quality, policy-compliant scheme.

4. Planning Policy Context

- 4.1. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications are determined in accordance with relevant development plan policies, unless other material considerations indicate otherwise. For this purpose, the statutory development plan comprises: The London Plan (2021) and the Haringey's Local Plan 2013-2026 (2013). In addition, national planning policy, supplementary guidance and emerging policies are relevant material considerations.
- 4.2. We set out below the planning policy context within which the proposals should be considered.

National Planning Policy & Guidance

- National Planning Policy Framework (NPPF) (December 2024)
- National Planning Practice Guidance

Regional Planning Policy

- The London Plan (March 2021)
- The London Plan DRAFT (July 2026)

Local Planning Policy

- Haringey's Local Plan 2013-2026 (2013)
- Haringey Development Management Development Plan Document (DPD) (2017)
- Haringey Draft Local Plan Part 1: Placemaking for Haringey (2025)
- Haringey Draft Local Plan Part 2: Neighbourhood Policies (2025)
- Haringey Draft Local Plan Part 3: Borough-wide Policies (2025)

Other Relevant Policy and Guidance

- Planning Contributions SPD (2018)
- Sustainable Design and Construction SPD (2013)
- Waste Management Guidance Note for Residential and Mixed-use Developments (2013)

Emerging Policy

- 4.3. LBH is in the process of preparing a new local plan having undertaken initial formal consultation between November 2020 and March 2021. The Council is currently collating and analysing comments received from consultation on the Draft Local Plan, held between July and September 2025, and is aiming to publish its Regulation 19 Submission Local Plan for consultation in mid 2026. Whilst the policies are still at a relatively early stage in the plan-making process, they are capable of being a material consideration in the determination of this application.
- 4.4. In a similar vein, a new draft London Plan has recently been published for consultation. The draft policies can be considered, but as it is at a very early stage, only limited weight would be attached to them.

Site Designations

- 4.5. As illustrated in the extract from the Haringey Adopted Policies Map below, the Site is subject to the following Local plan policy designations:
- Critical Drainage Area
- 4.6. In addition to the above, the Site is located in close proximity to the following designations:
- Crouch End District Centre (adjoins the south and west of the Site);
 - Crouch End Town Centre Secondary Frontage (adjoins the southwest along Tottenham Lane);
 - Crouch End Broadway Primary Shopping Area (to the further southwest along Tottenham Lane); and
 - Crouch End Conservation Area (further south of the Site).

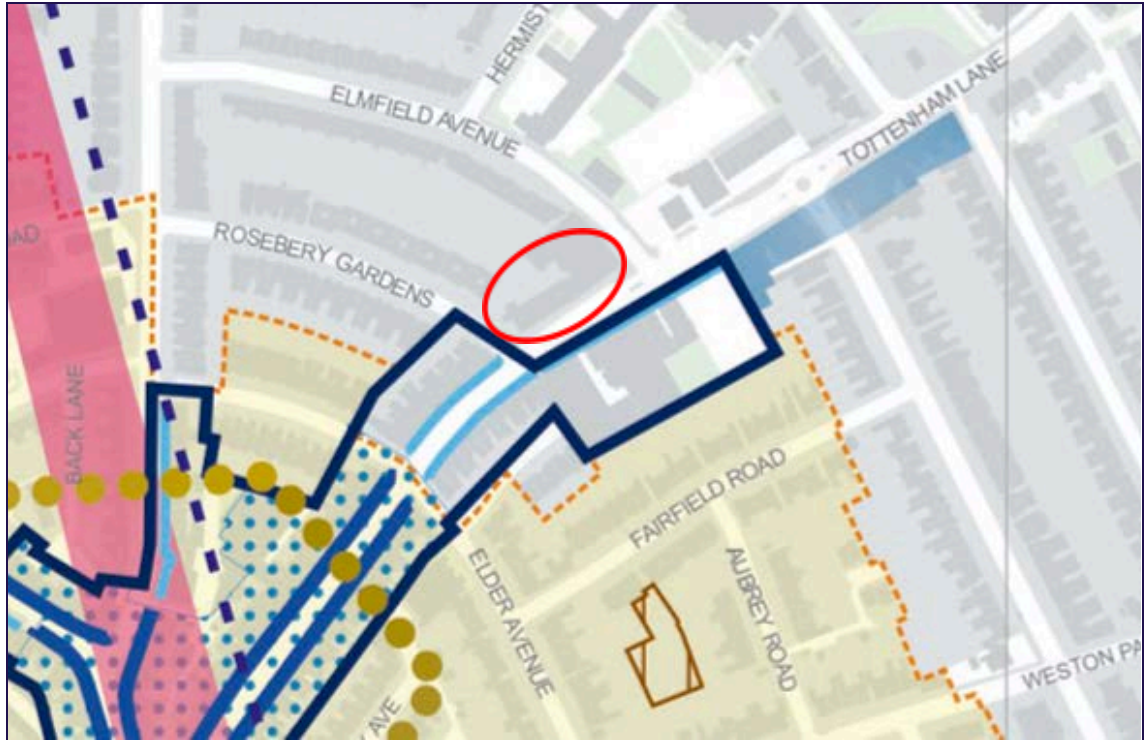


Figure 4.1 : Extract from Haringey's Policies Map (approximate site location circled in red)

5. Planning Assessment

5.1. Following on the policy context set out above, the following sets out why the proposal is acceptable in relation to the relevant policies and to the surrounding area under the following headings:

- A. General principle of development
- B. Temporary accommodation/ hostel considerations
- C. Design and Heritage considerations
- D. Amenity considerations
- E. Environmental issues
- F. Sustainability and climate change
- G. Transport, access and servicing
- H. Section 106 and CIL

A. General Principle of Development

Presumption in Favour of Sustainable Design

5.2. Achieving sustainable development is a key principle of the NPPF, and paragraph 11 of the Framework sets out a clear presumption in favour of granting permission for sustainable forms of development. Paragraph 8 of the Framework sets out the three overarching objectives that the planning system needs to pursue in order to achieve sustainable development which the application proposals would contribute towards as follows:

- a) **Economic objective**—the proposals would create job opportunities during both the construction and operational phases, including a commitment to securing local employment. As such, the proposal would “help to build a strong, responsive and competitive economy.”
- b) **Social objective** – the proposals would regenerate the Site by retaining and significantly improving an important hostel in LBH, delivering modern hostel for vulnerable young people. The proposals would enhance the townscape and contribute towards a “strong, vibrant and healthy” community by fostering “well-designed and safe places”.
- c) **Environmental objective** – the proposals would make a contribution to tackling climate change by “making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy”.

5.3. It is, therefore, clear that the proposals represent a highly sustainable form of development and so, in accordance with paragraph 11 of the NPPF, there should be a presumption in favour of planning permission being granted.

The London Plan and Good Growth

5.4. Chapter 2 of The London Plan sets out the Mayor’s overarching principle of “Good Growth” which is defined in paragraph 1.0.1 as growth that is socially and economically inclusive and environmentally sustainable. The principles of good growth underpin the whole of

The London Plan, and is defined as the way in which sustainable development in London is to be achieved.

- 5.5. Good Growth Objective 2 (GG2) is “making the best use of land” and seeks to accommodate London’s housing needs by making more efficient use of the city’s land (paragraph 1.2.1).
- 5.6. Paragraph 1.2.2 states that the key to achieving this will be taking a rounded approach to the way neighbourhoods operate, and creating places of higher density in appropriate locations to get more out of limited land. This is built upon in paragraph 1.2.4 which explains that making the best use of land means directing growth towards the most accessible and well-connected places, making the most efficient use of existing and future public transport, walking and cycling networks.
- 5.7. Policy GG4 states that to create a housing market that works better for all Londoners, those involved in planning and development must create mixed and inclusive communities, with good quality homes that meet high standards of design and provide for identified needs, including for specialist housing.
- 5.8. Policy H8 states that the loss of hostels, shared and supported accommodation that meet an identified housing need should be satisfactorily re-provided to an equivalent or better standard.
- 5.9. In responding to these policy requirements, the proposed development clearly accord with the Mayor’s Good Growth objectives. The Site has good public transport connection with a range of shops, services and community facilities in the local area. The proposed hostel would improve the existing temporary accommodation stock and deliver a modern hostel facility that aligns with current best-practice standards, meeting an identified need for vulnerable young people aged 16 to 35, directly responding to the requirements of Policy GG4 and Policy H4. The proposals therefore represent exactly the type of development that the London Plan seeks to support.

Summary - Principle of Development

- 5.10. In summary, the principle of development is strongly supported in land use terms and would contribute to meeting local and strategic objectives to deliver new and modern affordable temporary accommodation for young people which remains a priority land-use for the Council.
- 5.11. There can be little doubt that the Site represents a highly sustainable location to deliver new development and that it is, therefore, a fundamental requirement of the project (and all those involved in the planning process) to make the most efficient use of land in order to meet London's growth needs in a sustainable manner.
- 5.12. The proposed development is strongly supported in policy terms, but moreover, the opportunity cost of not delivering the scheme would be significant in terms of a new and modern hostel for young people, and the wider economic benefit that the development would provide. The planning benefits of the proposed development are clear, and should weigh in favour of the scheme from a planning decision-making perspective.

B. Temporary Accommodation/ Hostel Considerations

Temporary Accommodation Need and Making Efficient Use of Land

- 5.13. The NPPF supports the Government's objective of significantly boosting the supply of homes and seeks to ensure that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay (Paragraph 61).
- 5.14. The Framework also promotes and supports the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively (Paragraph 125).
- 5.15. London Plan Policy H12 supports the delivery, retention and refurbishment of supported and specialised housing which meets an identified need.
- 5.16. Local Plan Policy SP2 sets out the Council's strategy vision on housing delivery and states that the Council will maximise the supply of additional housing to meet and exceed its minimum strategic housing requirement. The annual housing target should be provided through a range of housing supply, including non-self contained homes such as hostels.
- 5.17. Local Plan Policy DM15 specifically sets out the Council's approach to specialized housing. Part E of the policy states that the Council will support proposals for the provision of new hostels and secured accommodation where:
- a. They do not involve the loss of permanent housing or existing satisfactory shared accommodation;
 - b. They will not result in an overconcentration of provision in an area;
 - c. They are located close to public transport, shops and services;
 - d. The scale and intensity of hostel use or secured accommodation is appropriate to the size of the building;
 - e. There would be no adverse impact on the amenity of neighbouring properties or the character of the area; and

- f. The accommodation and facilities, including provision for safety and security, is suitable for the intended occupiers.
- 5.18. Paragraph 3.35 specifically recognises that hostels and secured accommodation are a necessary component of social care provision, providing suitable temporary accommodation that, where appropriately managed, can help integrate vulnerable people, homeless households and special needs groups into the community.
- 5.19. The GLA's Strategic Housing Land Availability Assessment, the most recent of which was published in November 2017, indicates that among the non-self-contained accommodation pipeline that contributes to London's housing target, only 7% comes from hostel accommodation, with the majority (83%) coming from student accommodation.
- 5.20. Within Haringey, the net non-self-contained pipeline identified for 2019/20 to 2028/29 amounts to only 71 bedrooms based on a 3:1 ratio, equating to just 20 additional homes counted towards the borough's housing target once rounded down. This represents a negligible contribution to meeting the specific identified housing need in the borough for temporary accommodation.
- 5.21. London's housing system is under unprecedented pressure: over 101,000 young people aged 16-24 presented to local authorities as homeless or at risk last year, with London accounting for 15,000 of these presentations, a 10% increase year-on-year. The existing hostel is a protected use and the proposed development represents a once-in-a-generation opportunity expected to support some 13,000 homeless-experienced young people over the next 60 years, and is strongly supported by planning policy, subject to the criteria set out in Policy DM15.
- 5.22. Considerations should also be given to the existing building's condition and operation performance which is unfit for purpose and incapable of refurbishment to the required standard.
- 5.23. In response, the proposal seeks to increase bedspaces from 155 to 174, with all rooms en-suite and arranged within shared flats of two to six residents with communal kitchens, enabling far greater independence than the existing fully catered model. The scheme also

provides 10% wheelchair accessible/adaptable units, 14% larger move-on flats, and generous communal and ancillary facilities.

- 5.24. In addition, the current accommodation is used to accommodate asylum seekers, which is not fit for purpose for its intended use for young people.
- 5.25. The application is supported by a Social Impact Plan and a Housing Management Plan, both prepared by YMCA London City and North, which set out in detail the social objectives of the proposed development and the management framework that will underpin its operation. The Housing Management Plan confirms that Haringey Council will retain 100% referral rights to the scheme, with 24-hour on-site staffing, robust behaviour management policies, and structured progression pathways to support residents towards independent living.
- 5.26. Accordingly, the delivery of the proposed redevelopment represents a significant benefit and would contribute towards meeting Haringey's wider housing targets in a sustainable manner.

Dwelling Mix

- 5.27. Although there is no specific policy requirement for the dwelling mix of temporary accommodation, the proposed mix has been informed by the YMCA's operational experience and reflects an appropriate balance between communal living and resident independence, while ensuring the development meets the needs of a range of occupiers.
- 5.28. The proposed mix of units within the proposals is as follows:

No. of bedspaces	174 bedspaces
6 bed of clusters	96 beds (14 flats)
5 bed of clusters	45 beds (9 flats)
4 bed of clusters	8 beds (2 flats)
3 bed of clusters	15 beds (5 flats)
2 bed of clusters	10 beds (5 flats)
Proportion of move on bedrooms	14%

Standard of Hostel Accommodation

- 5.29. London Plan Policy D6 states that housing developments should be of high quality and provide adequately sized rooms, with comfortable and functional layouts which are fit for purpose and meet the needs of Londoners. Local Plan Policy SP2 and Policy DM12 reinforce this approach at the local level.
- 5.30. Whilst there are no specific policy for the design and quality of hostel, it is considered in general terms that hostel accommodation should be:
1. easily accessible to all sections of the community (including disabled people) by meeting inclusive design principles.
 2. easily accessible by walking and cycling.
 3. well connected to public transport.
 4. affordable and compatible with social infrastructure service delivery plans.
 5. well laid out and flexible, so that all the space is used efficiently.
 6. safe and user-friendly.
 7. integrated with or complementing other neighbouring facilities or services as part of achieving a lifetime neighbourhood.
- 5.31. At present, the existing YMCA facilities do not meet all of these criteria, having issues with accessibility, not being well laid out and flexible and not being user friendly. The existing building dates from the early 1920s with extensions in 1950s and 1980s, and falls short of the YMCA's needs for a temporary accommodation to suit today's best practice. The key deficiencies are:
- small bedrooms,
 - shared shower rooms,
 - limited access for disabled users,
 - fully catered accommodation that limits the opportunity for residents to become more independent,
 - long and narrow corridors that contribute to antisocial behaviours, and

- poor thermal performance.

5.32. The existing hostel on site is of a poor standard with an institutional feel. Although it is usable, it does not offer much to residents. The communal areas are also of a poor quality, also having an institutional feel about them, as these photographs show.



Figure 5.1 : Existing communal area of the temporary accommodation

- 5.33. An option was considered that looked at improving the existing building compared to redevelopment. However, it was concluded that although ensuite rooms could be provided, the constraints of the building's grid resulted in very small rooms, and the circulation did not permit the desired cluster flat layouts. Many of the existing issues with the building would remain, and the quality of accommodation would remain poor..
- 5.34. All bedrooms would be provided on an en-suite basis, offering toilet and bathroom facilities as well as communal kitchen and living room arrangements, a significant improvement on the existing shared toilet and shower facilities. Although the scheme would offer significant improvements to the sleeping accommodation, this would not be at the expense of the ground level communal areas, which would be larger and more

spacious, offering more facilities, including generous internal and outdoor amenity space, staff space, and shared spaces for use by residents, staff and the public, than at present.

- 5.35. The proposal would offer a significant improvement over this existing provision. The proposed development would contribute to and improve the quality of the temporary accommodation stock within the Borough.

Accessible Housing

- 5.36. London Place Policy D7 (Accessible housing) states that at least 10% of dwellings should meet Building Regulations requirement M4(3) 'wheelchair user dwellings', and that all other dwellings should meet M4(2) 'accessible and adaptable dwellings'.
- 5.37. 10% of all proposed bedspace are compliant with Building Regulations Part M4(3) "wheelchair accessible/ adaptable units".

Loss of the Existing Gym

- 5.38. The Site currently includes a commercial gym, run by the YMCA, located within the existing two-storey building on Elmfield Avenue. The proposed development would involve the demolition and removal of this use class on Site to facilitate the redevelopment of the Site.
- 5.39. Given that the gym operates on a commercial basis, rather than forming part of the protected hostel use, there is no policy requirement to retain or reprovide it as part of the proposed development. The gym has in any event already been identified for closure, reflecting its limited ongoing viability.
- 5.40. In addition to the above, existing users of the gym are well-served by a range of alternative commercial gym and leisure facilities within the immediate area. This includes:
- PureGym, Tottenham Lane — 1 minute walk (directly opposite the Site)
 - Virgin Active, Topsfield Parade — 3 minutes walk (0.1 mile)
 - Trinity Fit, Tottenham Lane — 8 minutes walk (0.3 miles)
 - CrossFit — 11 minutes walk (0.5 miles)
 - Park Road Leisure Centre and Lido — 11 minutes walk (0.5 miles)

- 3Tribes, Crouch End Hill/Coleridge Road — 10 minutes walk (0.4 miles)

- 5.41. It should also be noted that the YMCA runs the nearby Harringay Club located at 50 Tottenham Lane, which is a venue for an extensive range of activities for children and young people, which would include residents of the proposed building. The activities include fitness related classes such as Gymnastics and Yoga. This would provide good alternative facilities for future residents of the building.
- 5.42. This position was confirmed during pre-application discussions, where Council officers considered the loss of the gym to be acceptable. On this basis, the loss of the existing gym is not in contrast with any policy concern and is fully supported in planning terms.

C. Design and Heritage Considerations

Policy Context

- 5.43. The NPPF places considerable emphasis on the importance of achieving high-quality design. The Framework states that ‘Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities’ (paragraph 131).
- 5.44. Paragraph 139 of the NPPF states that, “development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design”. As a corollary to this, bullet point b of the same paragraph states that “significant weight should be given to outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.”
- 5.45. Chapter 3 of The London Plan sets out the Mayor’s design policies for the capital noting in paragraph 3.1.2 that “understanding the existing character and context of individual areas is essential in determining how different places may best develop in the future”.
- 5.46. London Plan Policy D3 sets out the principle of optimising site capacity through the design-led approach which requires consideration of design options to determine the most appropriate form of development that responds to a site’s context and capacity for growth. Policy D9 (Part C) sets out a comprehensive set of criteria for assessing the impacts of proposed tall buildings and these are discussed in detail below.
- 5.47. Local Plan Policy DM6 sets out the requirements for tall buildings development. Part C(a) establishes design-quality criteria against which proposals must be assessed.
- 5.48. Local Plan Policy DM55 states: *“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 by the site*

allocation”.

- 5.49. With regard to heritage, Paragraphs 212 to 215 deal with the assessment of harm to a designated heritage asset and confirm that where development would lead to ‘substantial harm’ planning consent should be refused unless it can be demonstrated that the harm is necessary to achieve ‘substantial public benefits’. Where development would lead to ‘less than substantial harm’ to the significance of a designated heritage asset then this should be ‘weighed against the public benefits’ of the proposal.
- 5.50. London Plan Policy HC1 is clear that development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail and places emphasis on integrating heritage considerations early on in the design process.
- 5.51. Local Plan Policy DM9 requires proposals affecting designated or non-designated heritage assets and their settings to be assessed against the significance of those assets, supported by a statement describing that significance and the impact of the proposals upon it.

Scheme Response - Design

- 5.52. The Design and Access Statement prepared by LBA submitted as part of the application provides a detailed description of the proposals and a comprehensive review of the design issues associated with the development. The Statement also demonstrates an understanding of the townscape composition through a series of building analysis studies of the surrounding developments in the local area.
- 5.53. It is evident from the Design and Access Statement that LBA, and the wider design team, have developed a detailed and sophisticated understanding of the townscape context for the project which has, in turn, directly informed the proposals for 184 Tottenham Lane.
- 5.54. It is also necessary to recognise that the existing appearance makes a negative contribution to the special character, appearance and the setting of the local area. The existing YMCA building lacks the vertical and horizontal articulation and material richness that characterises the surrounding high street, resulting in a poor relationship with the

streetscape.

- 5.55. In response, the proposed design introduces a contrasting material palette and a clearly articulated façade composition that better responds to the local context, drawing upon the mix of Victorian and contemporary buildings that define Tottenham Lane. The proposals also respond to the existing pattern along the high street of marking key buildings through increased height at corner locations, with the proposed six-storey frontage reinforcing this feature and reinforcing a landmark presence at the northern approach to Crouch End from Wood Green and Turnpike Lane.
- 5.56. Specifically, the building's massing is articulated as a clear base, middle and top, breaking down its overall scale and drawing on the established composition of the surrounding high street.
- 5.57. The base is defined by marron glazed brick at ground floor level, referencing the established material palette along Crouch End's high streets; the middle is expressed in red brick with white brick piers with stacked soldier coursing to emphasise the vertical element, whilst the precast concrete banding at each floor provides a horizontal datum, responding to the high street context; and the top took reference from the tiled roofs of the neighbouring buildings, using familiar pitches and mansard profiles with metal dormer windows to break up the roofline and reduce perceived massing. A stainless steel shingle roof is proposed to give a sympathetic reference to the surrounding roofscape with the singles wrapped down to help break the building's mass.

Scheme Response - Townscape and Heritage

- 5.58. As set out in the DAS, the proposals have been carefully designed to respond to the specific constraints and opportunities of the site; deliver the optimum type, format and configuration of accommodation; respond to the character and appearance of the area, including designated heritage assets; and provide a viable and deliverable scheme capable of securing the public benefits set out in the submission.
- 5.59. A Heritage and Townscape Visual Impact Assessment (HTVIA) prepared by Iceni accompanies the application which assess the impact of the proposed development on

the significance of relevant above-ground heritage assets, including the visual impacts on the local townscape, the Crouch End Conservation Area, the Hillfield Conservation Area, and the statutorily and locally listed buildings within the study area.

- 5.60. As outlined in the Assessment, the Site occupies a prominent position on Tottenham Lane and forms part of the wider setting of the Crouch End Conservation Area. Whilst the existing building does not contribute to the architectural qualities that principally define the conservation area's significance, its established scale, institutional function and long-standing presence mean it acts as a transitional townscape element between the historic core and surrounding areas of later development. The HTVIA concludes that the proposed development preserves the character and setting of the conservation area, and has been carefully designed to respond to local townscape, key views and heritage sensitivities.
- 5.61. The proposed design draws upon the local character and materiality of Tottenham Lane, which is defined by a cohesive mix of Victorian and contemporary buildings, reintroducing a contrasting material palette and clearly articulated façade composition that better relates to the local context. The HTVIA confirms that the proposed development does not harm any locally important views and is not located within any strategic protected view corridor.
- 5.62. The most significant designated heritage asset within the study area is The Queen's Public House, a Grade II* listed building located approximately 120 metres southwest of the Site, at the junction of Tottenham Lane and Elder Avenue. The HTVIA notes that the YMCA site forms part of the wider setting of The Queen's; however, its contribution is principally contextual, reflecting its established townscape presence within the townscape rather than any direct architectural or historic relationship with the listed building. The HTVIA concludes that the proposed development would preserve the significance and setting of The Queen's Public House, and that no harm would arise from the proposed development.
- 5.63. The Site is also located within the setting of the Grade II listed Clock Tower and the Church of the Holy Innocents, together with a number of other listed buildings and non-designated heritage assets within the local area. The HTVIA has assessed each

heritage asset and concluded that the proposed development would preserve the significance and settings of these heritage assets. The assessment notes that the modest uplift in scale and architectural quality would provide a positive enhancement to the setting of nearby assets. The HTVIA also confirms that no harm would arise to any designated heritage asset.

- 5.64. The HTVIA also confirms that the Site is located within an established district centre and at a prominent corner junction, providing an appropriate context for a degree of additional height and prominence, subject to achieving a high standard of design and demonstrating acceptable townscape, visual and heritage effects. The Tall Buildings Statement submitted with the application demonstrates that the proposed development meets the criteria for locating taller buildings in this location, as set out in London Plan Policy D9 and Local Plan Policy DM6.

Inclusive Design

- 5.65. London Plan Policy D7 and Local Plan Policy SP2 states that at least 10% of dwellings should meet Building Regulations requirement M4(3) 'wheelchair user dwellings', and that all other dwellings should meet M4(2) 'accessible and adaptable dwellings'.
- 5.66. Local Plan Policy DM53 states that all hotels and visitor accommodation should be inclusive by providing at least 10% of all rooms to wheelchair accessible standards and must be fully fitted from occupation.
- 5.67. It is proposed that 10% of all bedspaces will be compliant with Building Regulations Part M4(3) wheelchair accessible/adaptable units. The proposed development has been designed to be fully inclusive, incorporating wheelchair accessible lifts, fully accessible kitchens and level access throughout the building, in accordance with London Plan Policy D7 and Local Plan Policy DM2.

Fire Safety

- 5.68. London Plan Policy D12 makes clear that all development proposals must achieve the highest standards of fire safety and requires all major proposals to be supported by a Fire Statement.

- 5.69. London Plan Policy D5 seeks to ensure that developments incorporate safe and dignified emergency evacuation for all building users. In all developments where lifts are installed, as a minimum, at least one lift per core (or more subject to capacity assessments) should be a suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the buildings. The Mayor of London has published guidance on Fire Safety (Policy D12(A), Evacuation lifts (Policy D5(B5)) and Fire Statements (Policy D12(B)).
- 5.70. The application is supported by a Fire Statement by TOGA which sets out the fire safety principles of the Proposed Development in order to satisfy the requirements of the Building Regulations and The London Plan. The Statement confirms that the proposals have been designed to fully accord with the relevant legislative and policy requirements from a physical, functional and operational perspective., as well as taking into account best practice guidance.

D. Amenity Considerations

- 5.71. Paragraph 135 of the NPPF states that planning decisions should seek to create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users.
- 5.72. London Plan Policy D9 calls for proposed tall buildings to carefully consider daylight and sunlight must be carefully considered.
- 5.73. Local Plan Policy DM1 requires development proposals to ensure a high standard of privacy and amenity for the developer's users and neighbours (in terms of sunlight, daylight and open aspects, privacy, vibration, noise, fumes and microclimate).

Daylight and Sunlight

- 5.74. The application is supported by a Daylight, Sunlight & Overshadowing Assessment, prepared by XCO2 Design, which confirms that the scheme will not unduly compromise the amenity of neighbouring residential properties assessed against the guidance set out by the Building Research Establishment 2022 (BRE), when taking into account the relationship with neighbouring properties and despite being within an urban area where access to daylight and sunlight is more constrained.
- 5.75. As set out in the BRE guidance, daylighting impacts on neighbouring properties are typically assessed using two main methods, namely the Vertical Sky Component (VSC) and No Sky Line (NSL). The BRE guidance states that if a development results in a reduction in VSC or NSL of less than 20%, and the retained VSC is greater than 27%, then the impact on daylight will not be noticeable.
- 5.76. Conversely, where an impact is above these thresholds, development will have a noticeable (or material) impact on neighbouring amenity which then must be assessed in the context of wider considerations, including site location and circumstances; prevailing context; and other scheme considerations.
- 5.77. Sunlight is assessed through the calculation known as the Annual Percentage Sunlight

Hours (APSH), which considers the amount of sunlight available during the summer and winter for each window facing within 90 degrees of due south (i.e. windows that receive direct sunlight). The amount of sunlight that a window receives should not be less than 5% of the APSH during the winter months of 21 September to 21 March, so as to ensure that such windows are reasonably sunlit. In addition, any reduction in APSH beyond 20% of its former value would be noticeable to occupants.

Impacts on Neighbouring Properties

- 5.78. The Assessment assesses the effect of the proposed development on the daylighting and sunlighting conditions of three existing surrounding residential properties, including:
- 157 Tottenham Lane
 - 159 Tottenham Lane
 - 161 Tottenham Lane
 - 163 Tottenham Lane
 - 32-38 Broadway Parade
 - 42-52 (even) Elmfield Avenue
 - 44-48 (even) Rosebery Gardens
 - 49-55 (odd) Rosebery Gardens
 - 55 Topsfield Parade.
- 5.79. The assessment results show that 195 of the 230 windows (85%) tested will be fully compliant with the BRE VSC guidance when compared with the existing. A further 21 windows achieve a VSC of 27% or retain at least 0.8 of their former value, but fall marginally short of the NSL guideline.
- 5.80. Of the remaining windows, 8 windows achieve a VSC above 20% and 2 windows above 15%, representing good to acceptable levels of daylight for a dense urban location. 4 windows sit beneath inset balconies with very low existing baselines (below 7% VSC) and retain at least 68% of their current value, of which these 4 windows serve rooms that pass the NSL test. As such, the internal spaces retain good sky visibility. It is worth noting that the retained levels of sunlight are considered typical for the urban context and the reductions are therefore considered acceptable.

- 5.81. In terms of sunlight, 51 windows facing within 90 degrees of due south were assessed, all of which (100%) accord with the BRE recommendations for APSH and winter probable sunlight hours.
- 5.82. In respect of overshadowing, 10 of the 13 (77%) neighbouring amenity spaces assessed will fully satisfy the BRE recommendation under proposed conditions, with at least 50% of their area receiving at least 2 hours of direct sunlight on 21 March. The three spaces that fall marginally below the BRE recommendation would still achieve full compliance by 19 April, indicating that any effect is transient and limited to early spring.
- 5.83. The Report therefore concludes that the proposed development would not give rise to any substantial harm to the daylight, sunlight or amenity of neighbouring properties, and that the retained levels remain appropriate for a dense urban context.
- 5.84. Overall, the assessment concludes that the proposals will meet or fulfil the BRE advisory guidance and that the daylight and sunlight impacts on neighbouring properties are acceptable. Where noticeable changes would occur, the resulting daylight and sunlight levels would remain appropriate for a dense urban context, particularly in light of the need to optimise the development potential of the Site.

Internal Light Levels within the Proposed Development

- 5.85. The Assessment also considers the daylight and sunlight provision to the new homes. The assessment has been prepared in line with the BRE guidance and uses two methodologies to test for daylight: Target Daylight Factor (DFT).
- 5.86. The internal daylight assessment considers 211 habitable rooms, comprising 174 bedrooms and 37 communal kitchens. Overall, 191 rooms (90%) meet the BRE recommendations.
- 5.87. Of the 174 bedrooms, 173 meet the BRE criteria. The remaining bedroom achieves 41% SDA, marginally below the 50% BRE target. However, the value increases to 57% when assessed with enhanced surface reflectances, thereby satisfying the target.
- 5.88. 18 of the 37 kitchens assessed meet the recommendations. Of the remaining kitchens, six kitchens achieve at least 40% SDA and four kitchens satisfy the 150 lux living-room

threshold when tested with enhanced reflectances.

- 5.89. There are nine kitchens that still fall short due to reliance on lightwells, deeper internal layouts, or localised external obstructions. In response, the design team has made amendments, including by expanding lightwell area and adjusting the window specifications, to ensure these kitchens remain usable. It is also worth noting that generally a kitchen is seen as less 'important' than living room and bedroom for receiving daylight., and in this case, 173 out of 174 bedrooms pass the relevant BRE criteria.
- 5.90. Overall, 91% of all assessed rooms meet the BRE recommendations, demonstrating good daylight provision for an urban scheme.
- 5.91. In respect of sunlight, 105 of the 111 south-facing bedrooms (95%) assessed achieve at least 1.5 hours of direct sunlight on 21 March. The six bedrooms that fall marginally short have access to communal kitchens on the same floor that receive at least four hours of direct sunlight, substantially exceeding the BRE recommendation.
- 5.92. In terms of overshadowing, a single communal amenity space is proposed and has been assessed. While it falls short of the BRE target on 21 March owing to low early-spring sun angles, sunlight coverage recovers to over 50% by 22 April and reaches 83% during the peak summer months, when the space is most heavily used.
- 5.93. It is therefore considered that the proposed development would provide good levels of internal daylight and sunlight for future residents, and a well-lit external amenity space, consistent with the objective of optimising the development potential of the Site and the relevant policy requirements.

Noise and Vibration

- 5.94. The NPPF provides guidance on planning policies and decisions with respect to noise in order to avoid noise giving rise to significant adverse impacts on health and quality of life; mitigating the impacts of noise; recognizing the impact of noise on business; and identifying and protecting areas not affected by noise for their recreational and amenity value.

- 5.95. London Plan Policy D14 sets out requirements to reduce, manage and mitigate noise from development and to improve health and quality of life.
- 5.96. The application is accompanied by a Noise Impact Assessment, prepared by KP Acoustics. The Assessment has undertaken an initial assessment of the noise impact of the proposed external plan installation which is proposed on the roof level, to determine noise risk to the nearest noise sensitive receptor when windows are fully open during night time to alleviate overheating. This was based on a noise survey carried out at the site between 12 and 14 November 2025.
- 5.97. The results indicated that the predicted noise levels from the combined operation of all proposed plant units would be at 31 dB(A) maximum during the night-time, which is 10 dB below the representative background noise level and 5 dB below the London Borough of Haringey's adopted noise emissions criterion of 36 dB(A). The Assessment concludes that, the proposed development represents a low impact indication, and that the proposed plant units comply with the statutory requirements without the need for additional acoustic mitigation measures.
- 5.98. Anti-vibration mounts are nonetheless recommended for all plant units to prevent structure-borne noise transmission and the noise performance of the plant can be secured by way of an appropriate planning condition to ensure the development meets the requirements of Approved Document O.

Safety and Security

- 5.99. Local Plan Policy DM15 Part (f) requires that the accommodation and facilities, including provision for safety and security, are suitable for the intended occupiers. In addition, the Crouch End Area Plan identifies increasing community safety as a key objective for the area.
- 5.100. It is noted within the pre-application advice that the existing building has experienced historic issues with anti-social behavior. In considering this, the proposed development will deliver significant improvements in this regard through both its design and operational management. Further details are set out in the Housing Management Plan submitted

with the application.

- 5.101. This includes relocating the main entrance away from the bus stand, reducing safeguarding concerns, and enlarging the reception area to create a more controlled and secure environment. The building will also incorporate controlled zoning, CCTV monitoring, and clear separation between public, communal and residential areas.
- 5.102. On this basis, the proposed development fully accords with the requirements of Policy DM15, and will represent a significant improvement on the existing building.

E. Climate Change and Sustainability

Policy Context

- 5.103. Sustainable development is a core principle of the NPPF, including supporting the transition to a low-carbon future in a changing climate, taking full account of flood risk and coastal change, encouraging the re-use of existing resources, and encouraging the use of renewable resources (including renewable energy) (paragraph 161).
- 5.104. The NPPF states that plans should “take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures” (paragraph 162).
- 5.105. The London Plan notes that all cities must face up to the reality of climate change and the need to limit their future contribution to this major global problem. The London Plan requires developments to contribute towards London’s ambitious target to become zero carbon by 2050 by increasing energy efficiency, including through the use of smart technologies, and utilising low carbon energy sources (paragraph 1.6.2).
- 5.106. London Plan Policy SI2 sets out the Mayor of London’s energy hierarchy: Use Less Energy (‘Be Lean’); Supply Energy Efficiently (‘Be Clean’); Use Renewable Energy (‘Be Green’) and monitor, verify and report on energy performance (‘Be Seen’). It also sets a target for all development to achieve net zero carbon, by reducing CO2 emissions by a minimum of 35% on-site and calls on boroughs to establish an offset fund (with justifying text referring to a £95/tonne cost of carbon).
- 5.107. Policy SI2 requires developments referable to the Mayor of London to demonstrate actions undertaken to reduce life-cycle emissions to fully capture the proposed development’s carbon footprint.
- 5.108. Policy SI3 calls for major development in Heat Network Priority Areas to have a communal low-temperature heating system, with the heat source selected from a hierarchy of options (with connecting to a local existing or planned heat network at the top). Policy SI4

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

- 5.109. Local Plan Strategic Policy SP4 requires all new development to be zero carbon (i.e. a 100% improvement beyond Part L of the 2013 Building Regulations) and a minimum reduction of 20% from on-site renewable energy generation.
- 5.110. Local Plan Policy SP6 requires developments to seek to minimise waste creation and increase recycling rates, address waste as a resource and requires major applications to submit Site Waste Management Plans.
- 5.111. Local Plan Policy DM21 of the Development Management Document requires developments to demonstrate sustainable design, layout and construction techniques. The Sustainability section in the report sets out the proposed measures to improve the overall sustainability of the wider scheme, including transport, health and wellbeing, materials and waste, water consumption, flood risk and drainage, biodiversity, climate resilience, energy and CO2 emissions and landscape design.

Energy Hierarchy

- 5.112. The Mayor of London has declared a climate emergency and has set an ambition for London to be net zero-carbon. This means all new buildings must be net zero carbon, and The London Plan sets the targets and policies required to achieve this. Following on from this, Haringey has made a commitment to deliver net zero emissions across Council functions by 2040, which is ten years earlier than the target set by the Government, and reflects the importance of tackling the issues of climate change in all its activities.
- 5.113. The application is accompanied by an Energy Statement, prepared by XCO2, who have formed an integral part of the design team to ensure that environmental and sustainability considerations have been taken into account at all stages of the design development process.
- 5.114. As detailed in the Statement, the scheme has been designed in direct response to the guidance in the London Plan and the GLA 'Sustainable Design and Construction

Supplementary Guidance'. In terms of energy, the proposals have been designed in accordance with the Mayor's 'Energy Hierarchy' as follows:

Use Less Energy – 'Be Lean'

- 5.115. The building design incorporates passive and active design measures responding to the specific conditions of the Site and its orientation, including high performance glazing with low G-values, high performance building fabric with low U-values, energy efficient LED lighting and mechanical ventilation with heat recovery (MVHR). The proposed layout and orientation also maximise natural daylight, natural ventilation and night cooling combined with thermal mass, reducing the need for artificial lighting and heating
- 5.116. The proposed 'Be Lean' measures would result in a saving of 2.6 tonnes of CO₂ from the Building Regulations 2021, which equates to a 9% improvement on the baseline.

Supply Energy Efficiently – 'Be Clean'

- 5.117. Consideration has been given to connecting the development to a nearby heat network. A review of the London Heat Map confirms that there are no existing networks within connectable range. On this basis, there are currently no CO₂ savings at the 'Be Clean' stage.

Use Renewable Energy – 'Be Green'

- 5.118. A range of potential renewable energy technologies have been considered for the development proposals, of which it has been determined that photovoltaic panels (PV) on roof space and air source heat pump (ASHP) are the most appropriate options for the proposed development.
- 5.119. The proposed 'Be Green' measures would result in a saving of 5.2 tonnes of CO₂ from the Building Regulations 2021, which equates to a 19% improvement on the baseline.

Overall carbon savings and carbon offsetting

- 5.120. Overall, the proposed measures under the 'Be Lean', 'Be Clean' and 'Be Green' stages of the hierarchy would cumulatively result in a saving of 7.8 tonnes of CO₂ from the Building Regulations 2021. This equates to a significant 28% savings against the baseline CO₂ emissions, which falls marginally short of the minimum onsite reduction target of 35%

set out by the GLA.

- 5.121. In order to meet the Zero Carbon target, and in accordance with policy requirements, a carbon offset payment would be provided, which would be secured via the S106 Agreement, as detailed later in this Statement.

Overheating

- 5.122. The application is accompanied by an Overheating Assessment, prepared by XCO2, which confirms that the the risk of overheating has been considered as part of the design development process, and that the proposed building design includes a range of measures to minimise and mitigate the potential for overheating, including:
- energy efficient LED lighting installation to reduce internal heat gains;
 - optimised glazing ratios on south and west facades to reduce excess solar gains;
 - solar control glazing with a g-value of 0.40;
 - external shading through deep window reveals and a window head overhang;
 - inward opening windows with maximised openable area to support natural ventilation;
 - mechanical ventilation with heat recovery; and
 - a BMS-controlled peak load lopping strategy utilising the existing Air Source Heat Pump (ASHP) system to provide cooling only during periods of exceptional heat.
- 5.123. The Assessment demonstrates that all rooms meet the CIBSE TM59 and Approved Document Part O (AD O), incorporating the combination of passive and active measures set out above. The Assessment also confirms the proposed development is designed for long-term resilience.
- 5.124. For the common spaces, the Assessment demonstrates that passive mitigation measures alone are insufficient to achieve AD O compliance. Active cooling is therefore required, subject to which all common spaces assessed achieve full compliance with the TM52 overheating criteria.
- 5.125. The ground floor communal corridor has been identified as presenting an overheating risk due to communal heating pipework distribution gains. This will be reviewed alongside the

MEP and fire ventilation strategy at the next design stage, with dedicated ventilation and fully insulated pipework to be considered to mitigate this risk.

- 5.126. Taking into account the above, it can be seen that the proposed development provides appropriate overheating mitigation measures and will provide an appropriate thermal environment for future occupants, in accordance with London Plan Policy SI4 and Haringey's Key Overheating Planning Application Requirements.

Circular Economy

- 5.127. The application is accompanied by a Circular Economy Statement, prepared by Potter Raper, which demonstrates how circular economy principles have been embedded in the design in accordance with London Plan Policy SI7 and the GLA's Circular Economy Statements Guidance (March 2022).
- 5.128. As a full new build, retention of the existing structures has been discounted on structural and operational grounds (as detailed within the submission). Circular economy opportunities therefore focus on material recovery from demolition and designing the new building for longevity, adaptability and disassembly.
- 5.129. The BRE audit estimates demolition arisings of approximately 6,656.42 tonnes, of which concrete accounts for 89.13% by weight. The reuse and recycling strategy would deliver 3% reuse and 94.9% recycling by weight, 97.9% diversion from landfill, exceeding the London Plan's 95% target. Recovered concrete and brick will be crushed and re-used as aggregate on-site where practicable, although bricks themselves may be re-used if practical.
- 5.130. The new build embeds the GLA's circular economy design principles:
- **Longevity** – durable, low-maintenance materials to minimise replacement;
 - **Flexibility and adaptability** – a regular structural grid and demountable partitions for future reconfiguration;
 - **Disassembly** – mechanical, reversible connections to enable material recovery at end of life; and
 - **Sustainable procurement** – high recycled content, responsibly sourced and

readily separable materials.

- 5.131. The above strategy directly supports London Plan Policy SI 7. Demolition and new build circularity targets are recommended to be fixed at this stage with a post-construction Circular Economy Statement to be secured by planning condition.

Whole Life-Cycle Carbon

- 5.132. The application is accompanied by a Whole Life Carbon Assessment, prepared by Potter Raper, which confirms that measures to reduce the whole life emissions of the proposed development have been implemented within the scheme design, in line with the GLA Whole Life Carbon Assessment Guidance (March 2022).
- 5.133. Actions to reduce the whole life emissions of the proposed Development have been implemented in the design in line with the GLA Whole Life Carbon Assessment Guidance document (March 2022). Some of the major steps to reduce whole life carbon include:
- low-carbon concrete mixes and reduced cement content, where structurally viable;
 - crushed concrete and brick from demolition re-used as recycled aggregate in the substructure (although bricks may be reused if practical);
 - responsibly sourced, low-embodied-carbon structural materials;
 - optimised piling and substructure design to reduce material quantities;
 - products with third-party verified EPDs in place of generic data; and
 - design for disassembly to maximise Module D benefits.
- 5.134. The Assessment presents the results in the format set out in the GLA Whole Life-Cycle Carbon Assessments Guidance (March 2022), reflecting the design as developed to RIBA Stage 3. A post-construction assessment is recommended and could be secured by an appropriate planning condition.

F. Other Environmental Considerations

Trees

- 5.135. The NPPF (Paragraph 136) stresses the importance of trees and makes clear that planning decisions should ensure that new streets are tree lined.
- 5.136. London Plan Policy G7 makes clear that development should seek to retain and protect trees of value and replace these where lost.
- 5.137. A Tree Survey has been prepared by PJC based on a site visit undertaken on 29th July 2025, which identified a total of 10 individual trees and tree groups within the Site and adjacent to the site with trunk diameters of 75mm or more at a height of 1.5m. Of these, no trees are identified as high quality (Category A), six are of moderate value (Category B) and four are of low quality (Category C), with no trees identified as unsuitable for retention (Category U).
- 5.138. The Survey also confirmed that there are no Tree Preservation Orders (TPOs) within or immediately adjacent to the Site.
- 5.139. The majority of existing trees are proposed to be retained, with the proposed building set back from the root protection areas to avoid impact during construction. Two category 'C' trees require removal to facilitate the proposals, and four trees will require access facilitation pruning. The extent of the facilitation pruning is described within the Arboricultural Impact Assessment (AIA) falls within acceptable parameters.
- 5.140. In terms of the two trees to be removed (T1 and T8), due to their small size and low arboricultural quality, the trees are considered to make a limited contribution to the character and appearance of the local area. Their removal is therefore considered to have a minor arboricultural and visual impact. Equally, the landscape proposals show more new trees will be planted to mitigate tree loss, along with additional hard and soft landscaping enhancements.
- 5.141. The existing building and associated foundations are to be demolished/removed adjacent

to T2-T4, T9 and T10. To minimise potential impacts to the root networks of retained trees, these works shall be undertaken sensitively as described with the AIA. To minimise impact to potential shallow root growth beneath the existing hardstanding, sympathetic construction methodologies shall be adopted. It is anticipated that these details can be secured by way of an appropriate planning condition if need be.

- 5.142. Taking the above into account, the proposals retain all trees and accord with NPPF Paragraph 136 and London Plan Policy G7.

Biodiversity, Ecology and Urban Greening

- 5.143. London Plan Policy G5 sets out the concept and defines Urban Greening Factor (UGF) as a tool used to evaluate and quantify the quality of urban greening provided by a development and aims to accelerate greening of the built environment, ensuring a greener London as it grows. It calls on boroughs to develop their own UGF targets, tailored to local circumstances, but recommends an interim target score of 0.40 for proposed development that is predominantly residential.
- 5.144. London Plan Policy G6 calls for development proposals to manage impacts on biodiversity and to aim to secure net biodiversity gain.
- 5.145. Local Plan Policy SP13 states that all development must protect and improve sites of biodiversity and nature conservation. In addition, Local Plan Policy DM19 makes clear that development on sites adjacent to internationally designated sites should protect and enhance their ecological value and Policy DM20 supports the implementation of the All London Green Grid.
- 5.146. The application is supported by a Preliminary Ecological Appraisal undertaken by PJC, which confirms that the Site is not located within any statutory designated sites for biodiversity. Within the immediate surrounding, the Site is located within the zone of influence of Parkland Walk Local Nature Reserve (approximately 800m south of the Site) and Alexandra Palace and Park Local Nature Reserve (approximately 950m northwest of the Site).
- 5.147. The PEA includes the results of a habitat survey that was undertaken on 11 December

2025 at the Site, which confirms that the Site is situated within a highly urbanised environment and comprises predominantly hardstanding and a small area of vegetated garden.

- 5.148. The PEA confirms that the Site has low-negligible potential to support bat roosting features and that the proposed development would not result in any impacts on roosting bats. Accordingly, no further bat surveys or specific mitigation measures are required.
- 5.149. The PEA identified the Site with some limited potential to support nesting birds, and have negligible potential to support great crested newts, reptiles, dormice, badgers, water coles and hedgehogs.
- 5.150. The report also sets out recommendations for ecological enhancements. Further details are also included in the Landscape section of the DAS which sets out the scheme will include generously-sized planting beds throughout the site's open spaces, with shade-tolerant and sun-loving species selected to suit the planting bed's microclimate, with RHS Perfect for Pollinator and UK-native plants prioritised to support local ecology. This can include night-scented pollinators to support nocturnal insects and maximise the site's benefit to ecology.
- 5.151. The application submission also includes a Biodiversity Net Gain Assessment prepared by PJC, which states that the Site has a pre-development biodiversity value of 0.45 Habitats Units (HU).
- 5.152. The results of the BNG Assessment demonstrated that the Proposed Development will result in a gain of 0.06 habitat units, which equates to an overall Biodiversity Net Gain of 14.47%, which exceeds the statutory 10% BNG requirement as required under Schedule 7A of The Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021).
- 5.153. As detailed in Landscape Chapter of the DAS prepared by Levitt Bernstein Architects, the proposals incorporate a series of soft landscaping interventions to enhance urban greening and ecological value across the site, including:

- Generously-sized planting beds incorporating native plants (as mentioned above);

- A rain garden within the courtyard;
- Replacement tree planting with new trees proposed; and
- Permeable resin-bound gavel surfacing to the courtyard activity area.

- 5.154. With regard to the Urban Greening Factor (UGF), the Report confirms that the scheme would achieve a UGF score of 0.13, which falls below the GLA's 0.4 target for predominantly residential schemes. The Report notes that the shortfall is due to the site constraints, including the ground floor circulation requirements, the presence of existing tree root protection areas and the proposed below-ground attenuation tank, of which have limited the available tree planting positions.
- 5.155. The Report also notes that an additional 825 sqm of greening (equivalent to flower-rich perennial planting) would be required to meet the 0.4 target, which is not achievable within the Site's constrained footprint without compromising deliverability or the usability of the courtyard space. The scheme has also taken the decision to prioritise the provision of PV panels on the roof spaces, rather than green roofs. This impacts on the UGF score that can be achieved, but does increase the carbon savings.
- 5.156. Notwithstanding this shortfall, the landscape design has sought to maximise greening through the provision of trees, rain gardens and flower-rich planting, prioritising a safe, usable and flexible external space for future residents.
- 5.157. In summary, the proposed development delivers a meaningful net gain in biodiversity and ecological value through high-quality green infrastructure. Whilst the scheme falls short of the Mayor's UGF target, this is due to site constraints, and the proposals should be considered against the practical realities of delivering this corner-plot redevelopment. The benefits should be afforded material weight in the overall planning balance.

Air-Quality

- 5.158. The NPPF states: "planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas." (Paragraph 199).

- 5.159. London Plan Policy SI 1 requires development proposals to not worsen air quality and be at least Air Quality Neutral. Local Plan Policies DM4 and DM23 require development proposals to consider air quality and be designed to improve or mitigate the impact on air quality in the Borough and improve or mitigate the impact on air quality for the occupiers of the building or users of development. Air Quality Assessments will be required for all major developments where appropriate. Where adequate mitigation is not provided planning permission will be refused.
- 5.160. The application is accompanied by an Air Quality Assessment (AQA), prepared by GEM, which identifies and addresses the potential air quality impacts during both the construction and operational phases of the proposed development. For both phases, the type, source and significance of potential impacts are identified, and the measures that should be employed to minimise the identified potential impacts.
- 5.161. The AQA also provides the results of an Air Quality Neutral Assessment, which indicates that both the building and transport related emissions are Air Quality Neutral and as such, no further mitigation measures are required. The Assessment has listed out a series of mitigation measures which can reduce the impact of dust soiling and PM10 to negligible level during construction, which can be secured by way of a standard condition.

Flood Risk and Drainage (SuDS)

- 5.162. The NPPF states that plans should “take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures.” (Paragraph 162).
- 5.163. London Plan Policy SI12 Part C states development proposals should ensure that flood risk is minimised and mitigated, and that residual risk is addressed. Policy SI13 deals with sustainable drainage and states that development proposals should aim to achieve greenfield run-off rates and ensure that surface waste run-off is managed as close to its sources as possible in line with the SuDS hierarchy.
- 5.164. Local Plan Policy DM25 requires the use of Sustainable Urban Drainage Systems (SuDS)

to manage surface water as close to its source as possible and meet specific standards. Policy DM26 requires development in such areas to incorporate measures to reduce the overall level of flood risk. Local Plan Policy DM27 requires the protection and improvement of water quality.

- 5.165. As set out above, the Site is located within Flood Zone 1 (ie. the lowest area of flood risk), a Flood Risk Assessment is not required as the Site is less than 1 hectares. However, a Flood Risk Assessment has been prepared by Pell Frischmann, which confirms the Site passes the Sequential Test by virtue of its location within Flood Zone 1. The FRA also identifies a moderate surface water flooding risk along Tottenham Lane, which can be reduced through appropriate mitigation measures.
- 5.166. A Sustainable Drainage Report prepared by Pell Frischmann is also submitted with the application, which sets out the proposed surface water drainage strategy. The strategy is based on reducing surface water run-off from the Site by discharging it at 5 litres per second (l/s) into the surface water sewer in Rosebery Gardens. The proposed SuDS measures include:
- Connection to the existing surface water sewer;
 - Geocellular attenuation tank to be located beneath the Site;
 - Permeable paving; and
 - Separate gravity system discharging to existing foul sewers.
- 5.167. Whilst the final details concerning the foul and surface water disposal will be confirmed during the detailed design phase, which can be secured by way of an appropriately worded planning condition, the proposals are designed in line with the relevant London Plan and Local Plan policies.

Land Contamination

- 5.168. The NPPF states planning policies and decisions should ensure that: “a site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination. This includes risks arising from natural hazards or former activities such as mining, and any proposals for mitigation including land remediation.”

(Paragraph 196).

- 5.169. London Plan Policies SD1 and E7 supports the remediation of contaminated sites, whilst Local Plan Policy LP58 requires new development to address risks to sensitive receptors (both on and off site) from land contamination through proportionate action(s) before and during construction and during operation where appropriate, planning conditions, over the lifetime of the development.
- 5.170. Local Plan Policy DM32 requires development proposals on potentially contaminated land to follow a risk management-based protocol to ensure contamination is properly addressed and carry out investigations to remove or mitigate any risks to local receptors.
- 5.171. The application is accompanied by a Phase 1 Desk Study by Ground & Water. The Study comprises a site survey conducted on 31 March 2026, which has identified a number of potential contamination sources and associated pollutants, requiring further investigations. This includes Potential for Made Ground which is associated with historical construction. Demolition, background levels of lead in soils, and aggressive ground conditions arising from the underlying London Clay Formation.
- 5.172. Meanwhile, the western portion of the existing building is considered likely to contain asbestos-containing materials, and an Asbestos Survey and Management Strategy will be required prior to any demolition works. A medium UXO risk has also been identified following a detailed assessment, with site supervision recommended during all stages of drilling and excavation.
- 5.173. In light of these findings, an intrusive Phase II ground investigation has been undertaken to further evaluate the risk of contaminants of concern within the soils and groundwater. The investigation confirms that the majority samples from the Site are classified as non-hazardous, with isolated exceedances of asbestos, lead, nickel and zinc identified within shallow Made Ground, which are likely to be removed during development.
- 5.174. With regard to groundwater, no further action is considered necessary. The ground gas risk assessment classifies the Site as Characteristic Situation CS1, with the risk from on-site sources considered to be low.

- 5.175. The Report recommends that an Asbestos Management Strategy is put in place prior to any demolition or alteration works, and that further soil sampling is undertaken post-demolition, which can be appropriately secured via planning conditions.
- 5.176. Subject to these measures, the application is accompanied by appropriate information to demonstrate that the Site can be remediated to a standard suitable for its proposed use, in accordance with the NPPF, London Plan Policy SD1 and Local Plan Policy DM32.

Wind Microclimate

- 5.177. London Plan Policy D8 seeks to ensure that public realm areas are well-designed, including, ensuring that microclimate considerations such as wind is taken into account to encourage people to spend time in a place. London Plan Policy D9 calls for proposed tall buildings to carefully consider wind and other microclimate issues.
- 5.178. The application is accompanied by a Wind and Microclimate Analysis Report, prepared by XCO2, which considers the implications of the revised proposals on wind microclimate.
- 5.179. As set out in the note, XCO undertook Computational Fluid Dynamic (“CFD”) simulations of the proposals which concluded that wind conditions would be suitable for pedestrian use throughout the Site and upper levels apart from a localised area on the 5th floor terrace at the corner of the Meeting/Board Room. The Report notes that this area exceeds the pedestrian safety threshold in both the proposed and cumulative scenarios, due to the proposed open metal railings not sufficiently screening higher-elevation winds. XCO2 has recommended the implementation of a 1m-tall solid (or up to 50% porous) screen along that corner to ensure year-round safety, the details of which can be secured via planning conditions. Overall, the proposed development is not expected to cause any significant adverse microclimate impacts.

G. Transport, Access and Servicing

Policy context

- 5.180. The NPPF (Para. 115) makes clear that in assessing applications, decision makers should ensure that appropriate opportunities to promote sustainable transport modes have been taken up and that the design of streets and other transport elements reflects national guidance (including the National Design Guide).
- 5.181. London Plan Policy T1 sets a strategic target of 80% of all trips in London to be by foot, cycle or public transport by 2041 and requires all development to make the most effective use of land. Policy T4 states that development proposals should reflect and be integrated with current and planning transport access, capacity and connectivity. Policy T5 encourages cycling and sets out cycle parking standards and Policies T6 and T6.1 to T6.5 set out car parking standards.
- 5.182. Other key relevant London Plan policies include Policy T2 – which sets out a ‘healthy streets’ approach to new development and requires proposals to demonstrate how it will deliver improvements that support the 10 Healthy Street Indicators and Policy T7 which makes clear that development should facilitate safe, clean and efficient deliveries and servicing and requires Construction Logistics Plans and Delivery and Servicing Plan.
- 5.183. Local Plan Policy SP7 states that the Council aims to tackle climate change, improve local place shaping and public realm, and environmental and transport quality and safety by promoting public transport, walking and cycling and seeking to locate major trip generating developments in locations with good access to public transport. This approach is continued in Local Plan Policies DM31 and DM32.

Scheme Response

- 5.184. A Transport Statement ("TS") and a Travel Plan by Velocity are submitted as part of the application and consider the wider transport implications of the project, including its impact on the highway network, public transport and pedestrian environment. The TS also includes an Active Travel Zone (ATZ) Assessment prepared in accordance with TfL

guidance, which assesses three priority walking and cycling routes against the Healthy Streets Indicators and identifies potential improvements to the pedestrian environment along each.

- 5.185. As set out in the TS, the application scheme has been designed in response to the key objective of focusing development in accessible locations in order to facilitate a more sustainable mode of travel. The Site has a moderate level of public transport accessibility good accessibility (PTAL 3) and there are numerous bus routes adjacent to the Site alongside a number of stations providing access to National Rail and London Underground services.

Trip generation

- 5.186. The TS includes a trip generation assessment which has been undertaken to establish the potential impact of the development on the existing transport network. The trip rates for the proposal has been derived using benchmark data for 'sheltered accommodation' from the TRICS Database. The anticipated weekday trips are set out in Table 5.1 below:

Time Range	Trip Generation		
	Arrival	Departures	Total
AM Peak (08:00 to 09:00)	28	38	66
PM Peak (17:00 to 18:00)	50	34	84

Table 5.1: Number of Predicted Weekday Trips (174 rooms)

- 5.187. Table 5.2 below sets out the net change in travel demand based on the existing hostel (155 bedspaces) and fitness centre compared to the proposed development (174 bedspaces):

Time Range	Existing Arrival	Predicted Departures	Total Net Change
AM Peak (08:00 to 09:00)	-4	-3	-7

PM Peak (17:00 to 18:00)	-8	-8	-16
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Table 5.1: Net Travel Demand Assessment

- 5.188. The Assessment confirms that, given that the proposals retain the existing hostel use, they will not introduce a materially new transport pattern, and trips to and from the Site will continue to be made predominantly on foot, by bicycle and by public transport.
- 5.189. On this basis, the TS conclude that the proposed development will not result in any significant impact on the number of trips during peak hours and will not result in any unacceptable transport impacts.

Car parking

- 5.190. In accordance with the sustainable transport policies, which seeks to reduce reliance on car borne journeys and promotes active and sustainable modes of transport, only one standard parking bay and one wheelchair accessible parking bay are proposed. The proposed standard parking bay will be used by staff and operational and delivery use of the proposed building and the accessible parking bay is saved for blue-badge. To ensure the proposals do not increase on-street parking pressure, future residents and staff would be restricted from applying for local on-street parking permits.

Cycle parking

- 5.191. The proposals incorporate high-quality long-stay cycle parking facilities at the ground floor and are accessed from Rosebery Gardens. In total, 58 no. long-stay spaces and 4 no. short-stay spaces are proposed for future residents, staffs and visitors, together with one mobility scooter space. 5 further short-spaces are provided by the existing short stay parking located adjacent to the site.
- 5.192. The long-stay provision comprises a mix of Sheffield stands, e-bike spaces and two-tier spaces, as below:
- Long-stay (residents and staff): 58 no. cycle parking spaces, comprising 24 no. Sheffield spaces, 20 no. e-bike spaces and 14 no. two-tier spaces;

- Long-stay mobility scooter: 1 no. space; and
- Short-stay Sheffield stands for visitors: 4 no. cycle parking spaces

5.193. The proposed cycle parking provision of 0.30 spaces per bedroom represents an increase on the observed demand of 0.20 cycles per bedroom at the existing Site, providing headroom for future growth in cycle use.

Deliveries, servicing and refuse

5.194. Local Plan Policy SP6 requires well-designed recycling facilities into all new developments.

5.195. The Transport Statement sets out the proposed servicing arrangements for the development together with the measures required to manage and monitor delivery and servicing activities. An Outline Delivery and Servicing Plan and an Operational Waste Management Plan have been submitted alongside the application as standalone documents.

5.196. The majority of day-to-day servicing activity will comprise small van-based deliveries, maintenance visits, courier deliveries and ad hoc contractor attendance, expected at a frequency of 3-5 trips per day. These will be accommodated on street using available kerbside space on Rosebery Gardens, as per the existing operational arrangements.

5.197. With regard to refuse storage and collection, the proposals will include a communal refuse store accessed through the communal corridor at ground floor level, providing a total storage capacity of 7,137 litres for residual waste, 5,129 litres for dry mixed recycling and 915 litres for food waste. Waste will be collected by private refuse vehicles on Elmfield Avenue, taking into account the 'School Street' restrictions. The TS includes a proposed amendment to the highway layout to support collection on Elmfield Avenue, comprising a reinstated kerb, relocation of the existing Blue Badge space and an extension of double yellow lines.

Summary

5.198. Taking into account the above, it is considered that the proposed development includes adequate provisions for on-site deliveries, refuse storage and collection, which would not prejudice the safety or capacity of the highway network, in accordance with policy

requirements. It is anticipated that the final Delivery and Servicing Plan that sets out further details will be secured via planning conditions.

H. Section 106 and CIL

5.199. The NPPF states that decision-makers should consider how otherwise unacceptable forms of development could be made acceptable through the use of conditions or planning obligations. In implementing this,, the Framework sets out the statutory tests which require such obligations to be:

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

5.200. London Plan Policy DF1 (Delivery of the Plan and Planning Obligations) requires development proposals to provide the infrastructure and meet other policy requirements necessary to ensure that they are sustainable and support the delivery of the London Plan. At a local level, LBH's Planning Contributions SPD (2018) sets out guidance in relation to planning obligations.

5.201. Following on from this policy context, the applicant acknowledges that Planning Obligations will be needed to mitigate possible impacts that might arise from the development, deliver policy objectives, deliver a package of benefits for the local community and to secure various delivery mechanisms for the project (in addition to the direct benefits the project itself would bring, as set out in the Social Impact Objectives Statement submitted with the application). The following obligations are suggested.

1. Carbon offset contribution - Estimated carbon offset contribution (and associated obligations) of £56,715 (indicative), plus a 10% management fee. Contribution to be re-calculated at £2,850 per tCO2 at the Energy Plan and Sustainability stages; 'Be Seen' commitment to upload energy performance data; Energy Plan; and Sustainability Review.
2. Car-Capped Agreement - £4,000 contribution to amend the Traffic Management Order.
3. Residential Travel Plan - The YMCA to appoint a travel plan co-ordinator, to monitor

the travel plan interventions annually for a minimum period of 5 years, via resident travel surveys in years 1, 3 and 5 to monitor and track progress of the travel plan in meeting and exceeding targets, with appropriate remedial measures in situ in case of non-compliance. Plan will include provision of welcome induction packs containing public transport and cycling/walking information to every new resident.

4. Highways s278 Agreement – pavement and carriageway repairs and improvements directly adjoining the site, corresponding TMO amendment and potential provision of new street trees.
5. Affordable Housing - development to be secured as affordable housing.
6. Local Employment - - Employment and Skills Plan; and Skills Contribution
7. Architect Retention - Applicant's architect/landscaped architect shall be retained (or another appropriate mechanism secured) to ensure the design quality of the development.
8. Monitoring Costs - Obligations monitoring payment calculated in accordance with the monitoring fee requirements of the Council's Planning Obligations Supplementary Planning Document (SPD).

5.202. During pre-application consultation, the provision of street trees in front of the proposed building along Tottenham Lane was raised (as included above at bullet point 4). The YMCA is exploring this option with the LB Haringey (given this pavement area is adopted as a public highway and outside the ownership and control of the YMCA). It should also be noted this area contains a number of services (including telecoms, electric and drainage), as set out in the Wastewater Utilities Assessment submitted with the application. This may complicate the provision of trees in this location.

5.203. The proposals would also be liable for both the Mayor of London and Borough Community Infrastructure Levy (CIL). This would include the London Mayoral CIL 2, which is chargeable at a rate for £60 per sqm for all uses in this location. In terms of the local Haringey CIL, this came into effect in September 2022 and in this area (Central) sees residential development charged at £229.21 per sqm. Whilst the proposal would be liable for CIL, as affordable housing, it would also benefit from full relief.

6. Summary and Conclusions

- 6.1. This Planning Statement is submitted in support of a full planning application for the redevelopment of 184 Tottenham Lane to deliver a modern hostel facility for young people.
- 6.2. The Site is located at the junction of Elmfield Avenue, Rosebery Gardens and Tottenham Lane in Crouch End, adjacent to the designated Crouch End District Centre, in a highly accessible area that is identified as a focal point for growth by planning policy at all levels.
- 6.3. The Site extends to 0.204 hectare and the existing YMCA hostel building on Site ranges from four to five storeys in height and comprises 155 bedspaces for young people. However, the existing building is aging and no longer meets the needs of its residents. The redevelopment represents a once in a generation opportunity that will shape the lives of 13,000 homeless experienced young people over the next 60 years.
- 6.4. The proposals are being put forward by the City and North YMCA, with a vision for the site to deliver a modern hostel where young people can achieve, contribute and thrive in the safety and knowledge of value-based support
- 6.5. This Planning Statement provides an overview of the key planning issues for the project and sets out why the proposals are considered appropriate, including:
 - The Site comprises an existing hostel which is no longer fit for purpose, and the proposed redevelopment will deliver **modern, best-practice** temporary accommodation for vulnerable young people, increasing the number of bedspaces from 155 to 174 to meet the growing need.
 - The Site is **well-connected**, with the highest possible PTAL score of 3 ('Good'), and is in an area well-served by a range of social community infrastructure and open space. It is a highly sustainable location for development.
 - The proposals will increase the number of bed spaces from 155 to 174, delivering modern hostel space aligned with current best-practice standards.
 - The proposal will improve the urban fabric at this part of the local area t,

contributing positively to the townscape. The proposed scale and high-quality design will enhance local character, as shown below.



- An energy-efficient development that includes a range of active and passive design measures, together with PV panels, to **reduce CO2 emissions**.
- The proposed development has been designed to reduce reliance on cars and will promote sustainable travel and be pedestrian-and cyclist-friendly.

6.6. The principle of development is strongly supported in planning terms. For the reasons set out in this Statement, it is considered that the proposed development accords with the development plan and fully responds to the pre-application feedback. It is, therefore, respectfully requested that planning permission be granted.