

Planning Sub Committee

REPORT FOR CONSIDERATION AT PLANNING SUB-COMMITTEE

1. APPLICATION DETAILS

Reference Nos: HGY/2023/2306 & 2307

Ward: Bruce Castle (Northumberland Park opposite)

Address: 'Printworks' 819-829 High Road, Tottenham, London, N17 8ER

Proposal: Full planning application for the demolition of existing buildings and structures to the rear of 819-829 High Road; the demolition of 829 High Road; and redevelopment for purpose-built student accommodation (Sui Generis) and supporting flexible commercial, business and service uses (Class E), hard and soft landscaping, parking, and associated works. To include the change of use of 819-827 High Road to student accommodation (Sui Generis) and commercial, business and service (Class E) uses. (HGY/2023/2306)

Listed Building Consent for internal and external alterations to 819/821 High Road (Grade II), including reinstatement of hipped roof, demolition works to the rear, façade and related external works, internal alterations, and associated works. (HGY/2023/2307)

Applicant: High Road West (Tottenham) Limited - Tottenham Hotspur Football Club (THFC)

Ownership: Private

Case Officer Contact: Philip Elliott

Site Visit Date: 28/09/2023

Date received: 24/08/2023

Last amended: N/A

Plans and Documents: See Appendix 05 to this report.

- 1.1 The applications have been referred to the Planning Sub-Committee for decision as the planning application is a major application that is also subject to a s106 agreement.

SUMMARY OF KEY REASONS FOR RECOMMENDATION

- The proposed scheme has a similar building envelope to the housing-led mixed-use scheme granted in August 2022 under references HGY/2021/2283 and HGY/2021/2284
- The proposal is a well-designed, student accommodation-led mixed-use scheme providing a range of student bedrooms and facilities and flexible commercial, business and service uses
- The proposed scheme safeguards industrial uses on the Peacock Industrial Estate
- The proposed scheme allows for an incremental delivery of comprehensive proposals for site allocation NT5, in accordance with Policy NT5 requirements and guidelines and the adopted High Road West Masterplan Framework
- The scheme would deliver 287 student bedspaces, 35% of which (101 rooms) would be affordable student accommodation in line with London Plan policy
- The proposal would contribute to meeting housing targets which equates to 114 conventional homes on the basis of the 2.5:1 ratio in the London Plan (a net gain of 101 homes)
- The layout and design of the development optimises the potential of the site, provides acceptable levels of open space given its location, and respects the scale and character of the surrounding area and the amenity of neighbours
- The architectural quality of the proposal is high, and the proposed height and form minimise impacts on the surrounding area and heritage assets
- The proposal secures the future of the Listed Buildings at Nos. 819-821 High Road and the locally listed 823-827 High Road and improves their immediate setting. The 'less than substantial harm' to the wider setting and significance of a number of heritage assets would be outweighed by the significant public benefits that the proposed scheme would deliver

2 RECOMMENDATION

- 2.1 That the Committee authorise the Head of Development Management or the Assistant Director of Planning, Building Standards & Sustainability to **GRANT planning permission and listed building consent** subject to the conditions and informatives set out below and the completion of an agreement satisfactory to the Head of Development Management or the Assistant Director of Planning, Building Standards & Sustainability securing the obligations set out in the Heads of Terms below.
- 2.2 That the section 106 legal agreement referred to in resolution (2.1) above is to be completed no later than 29/03/2024 or within such extended time as the Head of Development Management or the Assistant Director Planning, Building Standards & Sustainability shall in their sole discretion allow.

- 2.3 That, following completion of the agreement(s) referred to in resolution (2.1) within the time period provided for in resolution (2.2) above, planning permission is granted in accordance with the Planning Application subject to the attachment of the conditions.
- 2.4 That the Committee resolve to GRANT Listed Building Consent and that the Head of Development Management or the Assistant Director Planning, Building Standards & Sustainability is authorised to issue the Listed Building Consent and impose conditions and informatives.
- 2.5 That delegated authority be granted to the Head of Development Management or the Assistant Director of Planning, Building Standards & Sustainability to make any alterations, additions or deletions to the recommended heads of terms and/or recommended conditions (planning permission and/or Listed Building Consent) as set out in this report and to further delegate this power provided this authority shall be exercised in consultation with the Chair (or in their absence the Vice Chair) of the Sub-Committee.

Conditions Summary – Planning Application HGY/2023/2306 (the full text of recommended conditions is contained in Appendix 01 of this report).

- 1) 5-year time limit
- 2) Approved Plans & Documents
- 3) Contract - No demolition of No. 829 High Road until contract let to build the Printworks Block.
- 4) Photographic survey
- 5) Accessible Student Accommodation
- 6) Commercial Units - Ventilation/Extraction
- 7) Commercial Units - Café/restaurant Opening Hours
- 8) BREEAM Certificate
- 9) Commercial Units – Noise Attenuation
- 10) Noise Attenuation – Student Accommodation
- 11) Detailed Fire Statement
- 12) Landscape Details
- 13) Trees & Planting – 5-year Replacement
- 14) Biodiversity
- 15) External Materials and Details – Printworks Buildings
- 16) External Materials and Details – Nos. 823-827 High Road
- 17) No new Plumbing on outside of Nos. 823-827 High Road
- 18) No new Grilles on outside of Nos. 823-827 High Road
- 19) Living roofs
- 20) Ground Floor Western Boundary Details
- 21) Energy Strategy
- 22) Overheating (Student Accommodation)
- 23) Overheating (Non-Resi)
- 24) Building User Guide

- 25) Metering Strategy
- 26) Den Connection
- 27) PV Arrays
- 28) Urban Greening Factor
- 29) Secured by Design
- 30) Stage I Written Scheme of Investigation of Archaeology (PRE-COMMENCEMENT)
- 31) Stage II Written Scheme of Investigation of Archaeology
- 32) Foundation Design – Archaeology (PRE-COMMENCEMENT)
- 33) Written scheme of historic building investigation (PRE-COMMENCEMENT)
- 34) Land Contamination
- 35) Unexpected Contamination
- 36) Combined Stage 1/2 Road Safety Audit – Brunswick Square (PRE-COMMENCEMENT)
- 37) Car Parking Design & Management Plan
- 38) Cycle Parking Details
- 39) Delivery and Servicing Plan
- 40) Student Waste Management Plan
- 41) Detailed Construction Logistics Plan (PRE-COMMENCEMENT)
- 42) Public Highway Condition (PRE-COMMENCEMENT)
- 43) Demolition/Construction Environmental Management Plans (PRE-COMMENCEMENT)
- 44) Management and Control of Dust (PRE-COMMENCEMENT)
- 45) Non-Road Mobile Machinery 1 (PRE-COMMENCEMENT)
- 46) Non-Road Mobile Machinery 2 (PRE-COMMENCEMENT)
- 47) Impact Piling Method Statement (PRE-COMMENCEMENT)
- 48) Business and Community Liaison Construction Group (PRE-COMMENCEMENT)
- 49) Telecommunications
- 50) Evidence of operational public hydrants/suitable alternatives
- 51) Clean water capacity to serve the development (Thames Water)
- 52) Water Efficiency Condition

Informatives Summary – Planning Application HGY/2023/2306 (the full text of Informatives is contained in Appendix 01 to this report).

- 1) Working with the applicant
- 2) Community Infrastructure Levy
- 3) Hours of Construction Work
- 4) Party Wall Act
- 5) Numbering New Development
- 6) Asbestos Survey prior to demolition
- 7) Dust
- 8) Written Scheme of Investigation – Suitably Qualified Person
- 9) Deemed Discharge Precluded

- 10) Composition of Written Scheme of Investigation
- 11) Disposal of Commercial Waste
- 12) Piling Method Statement Contact Details
- 13) Minimum Water Pressure
- 14) Paid Garden Waste Collection Service
- 15) Sprinkler Installation
- 16) Designing out Crime Officer Services
- 17) Land Ownership
- 18) Site Preparation Works
- 19) Listed building consent
- 20) S106 agreement and s278 agreement

Conditions Summary – Listed Building Consent Application HGY/2023/2307
(the full text of recommended conditions is contained in Appendix 02 of this report).

- 1) 5-year time limit.
- 2) Development to be in accordance with approved plans and documents.
- 3) Contract to complete works to be in place prior to demolition.
- 4) Matching materials
- 5) Hidden historic features
- 6) Redundant plumbing, mechanical & electrical services
- 7) Making good redundant plumbing, mechanical & electrical services
- 8) Approval of details, including method statements (various)
- 9) Masonry cleaning
- 10) No new plumbing
- 11) No new grilles

Informatives Summary – Listed Building Consent HGY/2023/2307 (the full text of Informatives is contained in Appendix 02 to this report).

- 1) Working with the applicant
- 2) External materials to be approved pursuant to Planning Permission (HGY/2023/2306)

Section 106 Heads of Terms:

Affordable Housing

- 1) **Affordable Student Accommodation** – Affordable Student Accommodation Scheme to be submitted for approval prior to commencement of development:
 - a. Minimum of 35% of the proposed accommodation shall be affordable student bedspaces (101 student bedspaces)
 - b. Affordable student accommodation residents to have access to the same communal amenity as the market accommodation.

- c. The rent charged must include all services and utilities which are offered as part of the package for an equivalent non-affordable room in the development. There should be no additional charges specific to the affordable accommodation.

2) **Affordability**

- a. Affordable student accommodation shall meet the following affordability criteria:
 - o The **definition of affordable student accommodation** is a Purpose-built student accommodation (PBSA) bedroom that is provided at a rental cost for the academic year equal to or below 55 per cent of the maximum income that a new full-time student studying in London and living away from home could receive from the Government's maintenance loan for living costs for that academic year.
 - o The actual amount the Mayor defines as affordable student accommodation for the coming academic year is published in the Mayor's Annual Monitoring Report.
 - o Should the Government make significant changes to the operation of the maintenance loan for living costs as the main source of income available from the Government for higher education students, the Mayor will review the definition of affordable student accommodation and may provide updated guidance.
- b. the affordable student accommodation bedrooms shall be allocated by the higher education provider(s) that operates the accommodation, or has the nomination right to it, to students it considers most in need of the accommodation.
- c. The rent charged must include all services and utilities which are offered as part of the package for an equivalent non-affordable room in the development. There should be no additional charges specific to the affordable accommodation.
- d. The initial annual rental cost for the element of affordable accommodation should not exceed the level set out in the Mayor's Annual Monitoring Report for the relevant year. For following years, the rental cost for this accommodation shall be linked to changes in a nationally recognised index of inflation.
- e. A review period shall be set to allow for recalibrating the affordable student accommodation to the level stated as affordable in the Mayor's Annual Monitoring Report.

3) **Viability Review Mechanism**

- a. Early-Stage Review if not implemented within 2 years.
- b. Break review – review if construction is suspended for 2 years or more.

4) **Student use only in term time** - Accommodation secured for the use of students only during the academic year.

- Outside of the academic year the building shall only provide accommodation for conference delegates, visitors, interns on university placements, and students on short-term education courses or any similar use at any institution approved in advance in writing by the local planning authority, acting reasonably. The temporary use shall not disrupt the accommodation of the resident students during their academic year. Any ancillary use described above shall only be for a temporary period each year and shall not result in a material change of use of the building.

- 5) **Nomination Agreement** - The majority of the bedrooms in the development including all of the affordable student accommodation bedrooms shall be secured through a nomination agreement for occupation by students of one or more higher education provider.

Transportation

- 6) **Future Connectivity & Access Plan** – setting out how the development shall be constructed to allow for potential future pedestrian, cycling and vehicular access across the development to and from adjacent land (Peacock Industrial Estate).
- 7) **Percival Court resurfacing** - Works to resurface Percival Court within the application site and for the length of the application site up to the High Road.
- 8) **Car Capping** – No future occupiers will be entitled to apply for a residents or business parking permit under the terms of the relevant Traffic Management Order controlling on-street parking in the vicinity of the development. The applicant must contribute a sum of £4000 (four thousand pounds) towards the amendment of the Traffic Management Order for this purpose.
- 9) **Car Club Contributions** - Two years' free membership for all residents and £50.00 credit.
- 10) **Student & Commercial Travel Plans** comprising:
- a) Appointment of a Travel Plan Coordinator (to also be responsible for monitoring Delivery Servicing Plan) to monitor the travel plan initiatives annually for a minimum period of 5 years.
 - b) Provision of welcome induction packs containing public transport and cycling/walking information, map and timetables, along with a £200 voucher for active travel related equipment purchases for every new student.
 - c) Each travel plan requires the payment of £2,000 (two thousand pounds) per year, per travel plan for monitoring of the travel plans for a period of 5 years.

11) **Highways Agreement** – See Section 278 Agreement Heads of Terms.

Employment and Training

12) **Employment & Skills Plan** - Including Construction apprenticeships Support Contribution and Skills Contribution (to be calculated in accordance with Planning Obligations SPD).

13) Commitment to being part of the borough's **Construction Partnership**.

Carbon Management and Sustainability

14) **Energy & Potential future connection to District Energy Network**

- a) Submission of Energy Plan for approval by LPA
- b) Ensure the scheme is designed to take heat supply from the proposed DEN where viable (including submission of DEN Feasibility Study)
- c) Design of secondary and (on-site) primary District Heat Network (DHN) in accordance with LBH Generic Specification and approval of details at design, construction, and commissioning stages.
- d) Use all reasonable endeavours to negotiate a supply and connection agreement with the DHN within a 10-year window from the date of a planning permission.
- e) Sustainability review
- f) Heating strategy fall-back option if not connecting to the DEN
- h) Deferred carbon off-set contribution
- i) To install solar PV in the roof area reserved for the low-carbon heating solution if connecting to the DEN

15) **Carbon offsetting**

- Payment of an agreed carbon offset amount (residential & non-residential) plus 10% management fee on commencement.

Telecommunications

16) **Ultrafast broadband infrastructure** and connections to be provided.

Construction

17) Commitment to **Considerate Contractors Scheme**.

Monitoring

18) Based on 5% of the financial contribution total and £500 per non-financial contribution.

Section 278 Highways Legal Agreement Heads of Terms

- 19) Works to widen Brunswick Square public highway
- 20) Works to link in with High Road public highway
- 21) Works to resurface Brunswick Square for the length of the application site up to the High Road

Section 38 of the Highways Act

- 22) The adoption of a widened Brunswick Square including the new loading bay would require a section 38 agreement.

- 2.6 In the event that members choose to make a resolution contrary to officers' recommendation, members will need to state their reasons.
- 2.7 That, in the absence of the agreement referred to in resolution (2.1) above being completed within the time period provided for in resolution (2.2) above, the planning application and Listed Building Consent applications be refused for the following reasons:

Planning Application

- i. In the absence of a legal agreement securing 1) the provision of on-site affordable student accommodation 2) A nomination agreement and 3) viability review mechanisms the proposals would fail to meet the student accommodation and affordability aspirations for London. As such, the proposals would be contrary to London Plan Policies GG1, H4, H5 and H15, Strategic Policy SP2, and DM DPD Policies DM13, DM15 and Policy NT5.
- ii. In the absence of legal agreement securing 1) a Student Travel Plan and financial contributions toward travel plan monitoring, 2) Traffic Management Order (TMO) amendments to change car parking control measures, 3) and car club contributions the proposals would have an unacceptable impact on the safe operation of the highway network and give rise to overspill parking impacts and unsustainable modes of travel. As such, the proposal would be contrary to London Plan Policies T5, T1, T2, T3, T4 and T6. Spatial Policy SP7, Tottenham Area Action Plan Policy NT5 and DM DPD Policy DM31.
- iii. In the absence of an Employment and Skills Plan the proposals would fail to ensure that Haringey residents benefit from growth and regeneration. As such, the proposal would be contrary to London Plan Policy E11 and DM DPD Policy DM40.
- iv. In the absence of a legal agreement securing the implementation of an energy strategy, including connection to a DEN, and carbon offset payments the proposals would fail to mitigate the impacts of climate

change. As such, the proposal would be unsustainable and contrary to London Plan Policy SI 2 and Strategic Policy SP4, and DM DPD Policies DM 21, DM22 and SA48.

- v. In the absence of a legal agreement securing the developer's participation in the Considerate Constructor Scheme and the borough's Construction Partnership, the proposals would fail to mitigate the impacts of demolition and construction and impinge the amenity of adjoining occupiers. As such the proposal would be contrary to London Plan Policies D14, Policy SP11 and Policy DM1.

Listed Building Consent

- i. In the absence of a planning permission for the proposed change of use of the ground floor and conversion of the upper floors to housing, the proposed removal of historic fabric and internal and external alterations would be unnecessary and unacceptable. As such, the proposal is contrary to London Plan Policies HC1, Strategic Policy SP12 and DM DPD Policy DM9.

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3. PROPOSED DEVELOPMENT AND LOCATION DETAILS

Proposed Scheme

- 3.1. The proposal consists of two applications, one for full planning permission for the demolition of existing buildings and structures to the rear of 819-829 High Road; the demolition of 829 High Road; and redevelopment for purpose-built student accommodation (PBSA) (Sui Generis Use Class) and supporting flexible commercial, business and service uses (Class E), hard and soft landscaping, parking, and associated works. To include the change of use of 819-827 High Road to student accommodation (Sui Generis) and commercial, business and service (Class E) uses; and
- 3.2. The second application is for Listed Building Consent associated with the planning application, comprising internal and external alterations to 819/821 High Road (Grade II), including reinstatement of hipped roof, demolition works to the rear, façade and related external works, internal alterations and associated works.

Background – Recent permission & consent

- 3.3. The application site has an extant planning permission and Listed Building Consent (LBC) granted in August 2022 (refs. HGY/2021/2283 & HGY/2021/2284) for the redevelopment of the site for 72 residential homes, a cinema and supporting commercial uses.
- 3.4. The approved development included the following:
- Retention and adaptation of the High Road properties at Nos. 819-827 High Road.
 - Demolition of existing buildings and structures to the rear of 819-829 High Road.
 - The demolition of 829 High Road and creation of a widened, high-quality, and accessible public realm.
 - Internal and external alterations to 819/821 High Road (Grade II), including reinstatement of hipped roof, demolition works to the rear, façade and related external works, internal alterations, and associated works.
 - Redevelopment of the site for a residential-led, mixed use development comprising 72 residential units (C3), flexible commercial, business and service uses (Class E), and a cinema (Sui Generis).
 - Delivery of on-site private and public amenity/open space.
 - Associated parking (primarily at basement) and hard/soft landscaping.

- 3.5. The heights of buildings of the extant permission as detailed above increased further from the High Road, being 2/3 storey on the High Road frontage to a maximum of 7-storeys in the north-west corner. The remainder of the scheme was at lower heights, notably 6 storeys in the south-west corner, 5 storeys along the western boundary between these corner blocks, and 3/4 storeys to the rear of the High Road properties.
- 3.6. The current proposals retain the overarching design principles of the extant scheme, with the established building parameters (including consented heights and footprints) and the approach to external appearance largely retained. The principal changes relate to the use, with the cinema being omitted and an alternative form of accommodation now proposed in the form of Purpose-Built Student Accommodation (PBSA).
- 3.7. The change to PBSA and the omission of the cinema has resulted in the second podium courtyard/garden to the western end of the site being brought down to ground floor level in this current proposed scheme allowing a level link to Brunswick Square from that courtyard.
- 3.8. The central section of the building facing Peacock Industrial Estate to the west has also been raised by one storey to 6-storeys in height. There are also additions in several places towards the western elevation to accommodate the increase in floorspace and to provide suitable layouts for the change to PBSA.
- 3.9. The basement of the extant permission has also been removed from the current proposals. This is due to the lower requirement for blue badge parking required by the London Plan. There are also several other elevational alterations to serve the student accommodation. Entrances to different clusters have been included on the western elevation to provide activation akin to the maisonettes within the extant scheme.
- 3.10. The applicant has indicated that they have decided not to bring forward the extant mixed-use housing/cinema scheme as the operator for the boutique style cinema pulled out, which has resulted in the extant scheme being no longer viable to bring forward. However, they have identified that there is a demand for student accommodation in this part of London and there has been interest shown from several universities in utilising the proposed PBSA.

Layout & Access

- 3.11. Cleared land to the rear of the retained and altered frontage buildings would be redeveloped in a series of new buildings based around two courtyards and will provide active frontages to Brunswick Square, Percival Court and (pulled back from the boundary by approximately 2.3m) the existing Peacock Industrial Estate and future development of this as part of the wider redevelopment of the High Road West Site Allocation (NT5).

- 3.12. The first courtyard immediately to the west of the High Road frontage buildings would connect to and benefit from access to Brunswick Square. The second open courtyard would also connect and have access to Brunswick Square but this access point would be located further to the west of the site. Both courtyards would provide private communal open space for the proposed student accommodation that would front it.
- 3.13. An accessible car parking space would be located in the southwest corner of the site, accessed from Percival Court. The buildings would extend from 2/3 storeys at its High Road frontage to a maximum 7 storeys at the north-west corner, with the remainder of the proposed scheme being at lower heights – notably 6 storeys in the south-west corner, 6 storeys along the western boundary between these corner blocks, and 2/3 storeys rising from the rear of the High Road properties.

Figure 01: Proposed ground floor layout



Buildings and uses

- 3.14. The proposal includes the change of use of the ground floor of the existing High Road buildings to form commercial units (Class E) and entrance areas to part of the student accommodation (Sui Generis) and the conversion of the upper floors to student accommodation use. The proposed student accommodation and ancillary spaces would extend back into the site and there would be flexible commercial units (Use Class E) at ground floor level to the four corners of the site.

Table 01: Proposed land uses and parking provision.

Total floorspace	9,580sqm GIA
Student (<i>Sui generis</i>)	222 cluster beds and 54 studios The upper levels of the High Road properties would provide 11 student bedspaces, comprising 9 cluster beds and 2 studios
	287 Student spaces 8,641sqm (GIA)
Commercial (Use Class E)	238sqm (GEA)
Open Space	Ground Floor: 635sqm (2.32 m ² /Bed) and Terrace: 210sqm (0.76 m ² /Bed)
Car parking	1 accessible space accessed from Percival Court
Cycle parking	219 long stay and 18 short stay spaces, totalling 237 spaces

*GEA (Gross External Area); GIA (Gross Internal Area)

Building heights

- 3.15. The proposed mansard roof extension would increase the height of Nos. 819 to 821 High Road behind the parapet by approx. 2.95m, with the proposed chimney breasts and chimney pots rising approximately 4.5m from the existing flat roof.
- 3.16. The proposed new buildings at the rear of the retained and altered frontage buildings would be of various heights, increasing from the High Road back towards the western boundary as follows:
- 3-storeys on to Brunswick Square;
 - 4 to 6-storeys on to Brunswick Square;
 - 7-storeys on to Brunswick Square;
 - 4 to 6-storeys on to Percival Court; and
 - A central 6-storey section facing Peacock Industrial Estate to the west.
- 3.17. These heights are illustrated in Figure 02 below:

Figure 02: Proposed building heights (looking towards the southeast)



Demolition and alterations

- 3.18. The proposed scheme involves the demolition of the locally listed No. 829 High Road in order to create a wider Brunswick Square public highway, together with the demolition of existing buildings and structures to the rear of the frontage buildings at Nos. 819 to 829 High Road.
- 3.19. The proposal also includes internal and external alterations to Nos. 819 to 821 High Road (for which Listed Building Consent is also sought), including reinstatement of a hipped roof, demolition works to the rear, façade and related

external works and internal alterations and associated works. The proposed high road frontage is illustrated in Figure 03 below:

Figure 03: View looking southwest from the High Road towards the site



The Site and Surroundings

- 3.20. The site comprises Nos. 819-829 High Road which range from 2 to 4-storeys in height and front the High Road. Nos. 819-821 are statutorily Listed (Grade II) and 823-829 are locally listed. All existing buildings are within the North Tottenham Conservation Area.
- 3.21. To the rear of the High Road, the site comprises a range of rear extensions, a large industrial shed-like extension to the Royale Banqueting Suite at Nos. 819-821 High Road and a fenced hard surface car parking yard area. All of these are located outside of the Conservation Area.
- 3.22. The site comprises a mix of Public Transport Accessibility Level (PTAL) 4 and 5, being immediately adjacent to local bus routes on the High Road and is approximately 260m from White Hart Lane Overground Station to the south-west, and approximately 1km from Northumberland Park railway station.

Surroundings

- 3.23. Brunswick Square to the north is a narrow public highway (3m at its narrowest point) which provides access to Peacock Industrial Estate to the west, as well as to a wedding decoration business and sign business on the ground floor of buildings to the north and the homes at the rear of Nos. 841-843 High Road. Residential flats above Nos. 831-833 High Road face directly south towards the site.

- 3.24. The High Road to the east is outside the designated Local Centre but includes a range of shops and other uses at ground floor and housing above. Nos. 831-833 High Road is identified as a 'negative contributor' to the Conservation Area and statutory Listed Buildings (Grade II) are located directly opposite on the east side of the road (Nos. 814 and 816-819).
- 3.25. To the south of the site lie Nos. 813-817 High Road (locally listed buildings) and beyond this is Percival Court, a narrow private road. Percival Court is a private shared access lane which creates a non-signalised junction with the High Road, within an Advanced Cycle Stopline on the High Road approach arm.
- 3.26. It is 2.78m wide at its narrowest point but widens out to the west, where it forms a boundary to the site. It does not provide 'through access' in its current form but is used by the existing properties to its north and south. It connects with the rear of the site in its south-west corner.
- 3.27. To the west of the site is the Peacock Industrial Estate (accessed via White Hart Land and Brunswick Square). Immediately to the west of the site is the Estate's access and parking area, with 2-storey industrial and warehousing units approximately between 16-19m from the boundary. Existing occupiers of the nearest units include a car repair garage, window and door manufacturer and a bakery.

Existing Land Uses

- 3.28. The site currently accommodates a number of uses based in buildings fronting the High Road and premises to the rear. These include 3 x health and beauty businesses (hairdressers, barbers, and nail bar), a bridal gown shop and a photography shop and the La Royale Banqueting Suite.
- 3.29. The Banqueting Suite hosts weddings, birthday celebrations, christenings, charity fundraisers, gala balls, Christmas parties, and corporate events. The venue has capacity for between 500 and 600 people. It has a frontage onto High Road (Nos. 819 and 821) and also has a large single-storey industrial shed-like extension at the rear, with a large surface car park.
- 3.30. In addition, there are also 13 x residential flats (which are understood to be occupied on a short-term leasehold basis) on the upper floors of the High Road buildings, mainly comprising studio and one-bedroom properties.
- 3.31. All existing uses/occupiers on-site would be displaced as a result of the proposals.
- 3.32. Table 02 below sets out the existing uses currently on the site:

Table 02: Existing uses

Use (Use Class)	Existing Floorspace (GIA)
Hairdressers, barbers, nail bar (<i>Sui Generis</i>)	98sqm
Barbers, bridal gown Shop & photography shop (Class E)	232sqm
Banqueting Suite (<i>Sui generis</i>)	1,942sqm
13 x residential flats (Class C3)	502sqm
Total	2,774sqm

Relevant Planning and Enforcement History

The Site

- 3.33. As noted above, the application site (the site) benefits from an extant planning permission and Listed Building Consent (LBC) granted in August 2022 (refs. HGY/2021/2283 & HGY/2021/2284) for the redevelopment of the site for 72 residential homes, a cinema and supporting commercial uses.
- 3.34. The current proposals retain the overarching design principles of the extant scheme, with the established building parameters (including consented heights and footprints) and the approach to external appearance largely retained. The principal changes relate to the use, with the cinema being removed and an alternative form of accommodation now proposed (student (PBSA)).
- 3.35. The use of No. 819-829 as a commercial “Banqueting Suite” was granted planning permission in November 1992 (HGY/1992/1059) (No. 819 High Road) and February 1994 (HGY/1993/0497) (No. 821 High Road). Most recently, this building was granted permission for a two-storey extension at ground and first floor in December 2005 (HGY/2005/1997).
- 3.36. A flexible change of use was granted under the Prior Approval process (HGY/2017/2925) at No. 823 High Road in October 2017. This changed the use of this property from office to a vape/e-cigarette shop on a temporary basis until October 2019.
- 3.37. An Environmental Impact Assessment (EIA) Screening Opinion (HGY/2021/1902) issued in July 2021 confirmed that a scheme very similar to the application scheme was not EIA Development.
- 3.38. A hybrid application for most of the High Road West (HRW) site allocation (NT5) proposed by Lendlease in partnership with Haringey Council reference HGY/2021/3175 was granted in August 2022 for the following:

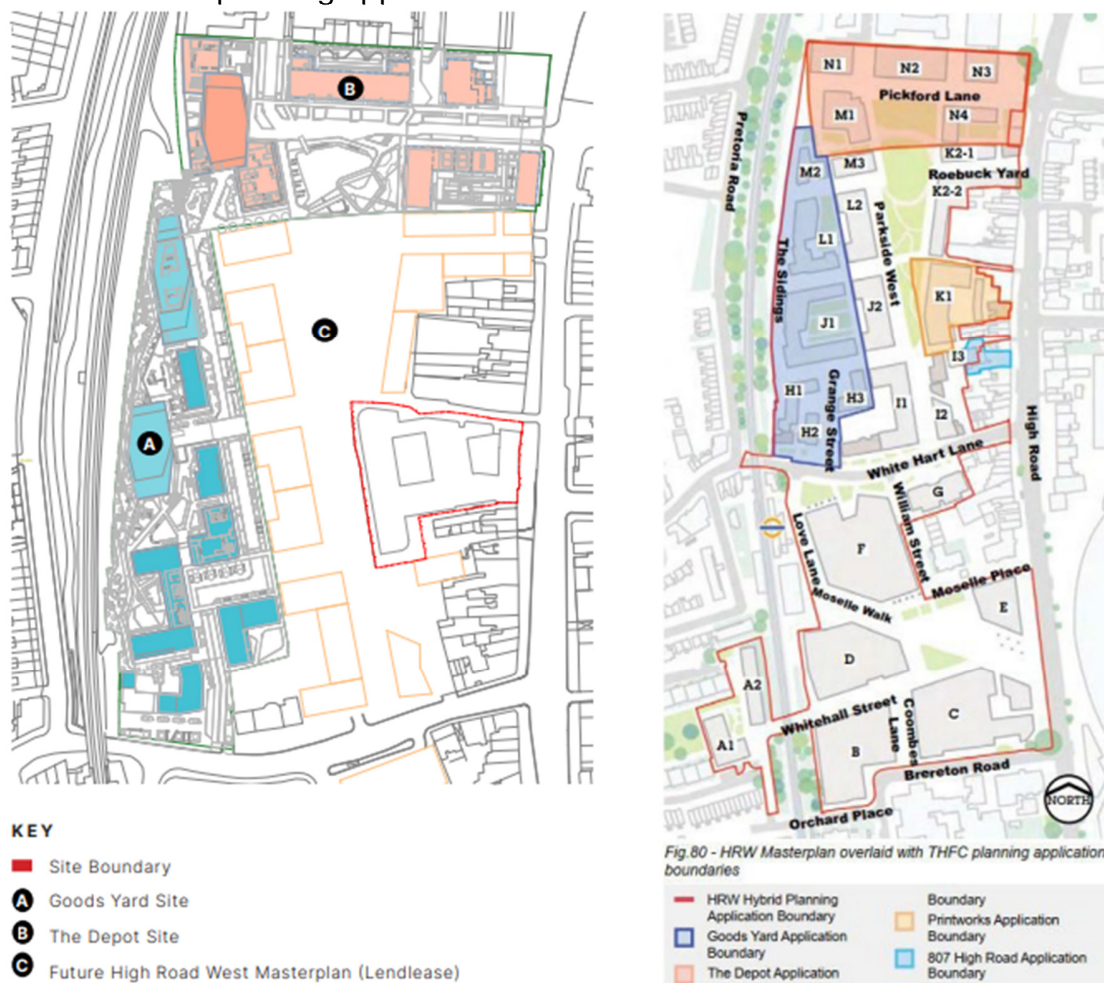
(1) outline component comprising the demolition of existing buildings and for the creation of a new mixed-use development including residential (Use Class C3), commercial, business and service (Use Class E), leisure (Use Class E),

community uses (Use Class F1/F2) and Sui Generis uses together with the creation of a new public square, park and associated access, parking and public realm works with matters of layout, scale, appearance, landscaping and access within the site reserved for subsequent approval; and

(2) detailed component comprising Plot A including the demolition of existing buildings and the creation of new residential floorspace (Use Class C3) together with landscaping, parking, and other associated works.

- 3.39. Figure 04 depicts the proposed development together with the recently approved Goods Yard and The Depot schemes (left), and the remainder of the recently permitted Lendlease masterplan (ref: HGY/2021/3175), north of WHL (right). The extant Printworks scheme could be accommodated within the Parameter Plans for HGY/2021/3175.

Figure 04: Emerging THFC masterplans (left) and HRW Masterplan overlaid with THFC planning application boundaries – taken from HGY/2021/3175 DAS.



Wider Area

- 3.40. **807 High Road** – Planning permission granted in September 2021 (HGY/2021/0441) for the demolition of the existing buildings and the erection of a replacement building up to four storeys to include residential (C3), retail (Class E, a) and flexible medical/health (Class E, e) and office (Class E, g, i) uses; hard and soft landscaping works including a residential podium; and associated works.
- 3.41. **Land at rear of Nos. 841-843 High Road** (HGY/2021/1704), Certificate of Lawful Use (Existing) granted in August 2021 for the use of the property as five self-contained flats.
- 3.42. **Goods Yard** - Planning permission (HGY/2018/0187) granted on appeal, against non-determination, in June 2019 for a residential-led mixed use redevelopment comprising up to 316 residential units, 1,450sqm of employment (B1 use), retail (A1 use), leisure (A3 and D2 uses) and community (D1 use) uses.
- 3.43. **Depot** – Planning permission (HGY/2019/2929) and Listed Building Consent (HGY/2019/2930) granted in September 2020 for the conversion of Nos. 867-869 High Road and redevelopment of the rest of the site for a residential led mixed-use scheme with up to 330 residential units (class C3), 270sqm of retail/café use (Use Class A1/A3), area of new public open space, landscaping and other associated works.
- 3.44. **Goods Yard & Depot** – Planning permission resolved for refusal in November 2021, the GLA was content for the LPA to determine the case itself and the application was refused on 21/12/2021 (HGY/2021/1771) for (i) the demolition of existing buildings and structures, site clearance and the redevelopment of the site for a residential-led, mixed-use development comprising residential units (C3); flexible commercial, business, community, retail and service uses (Class E); hard and soft landscaping; associated parking; and associated works. (ii) Change of use of No. 52 White Hart Lane from residential (C3) to a flexible retail (Class E) (iii) Change of use of No. 867-869 High Road to residential (C3) use. An appeal was lodged with the Planning Inspectorate on 22/12/2021 and the appeal was allowed on 24th October 2022.
- 3.45. **Goods Yard & Depot II** (HGY/2022/0563) – similar to the above scheme but with the main difference being the scheme includes changes to accommodate additional staircases in the tall buildings to meet the latest fire safety regulations. The scheme secured a resolution to grant planning permission in July 2023. The s106 is being finalised and once agreed a stage 2 referral will be sent to the Mayor of London.

- 3.46. **Northumberland Terrace** – Planning permission (HGY/2020/1584) and Listed Building Consent (HGY/2020/1586) granted in April 2021 for the erection of a four-storey building with flexible A1/A2/A3/B1/D1/D2 uses and change of use and alterations and extensions to several existing buildings (Nos. 799 to 814 High Road).
- 3.47. **Consultation and Community Involvement**
- 3.48. The applicant has submitted a planning statement that includes a statement of community involvement. The extant proposals were subject to community and stakeholder engagement, with the scheme evolving in response to these. The applicant's Statement of Community Involvement (SCI) for the extant scheme (refs. HGY/2021/2283 & HGY/2021/2284) set out the consultation it undertook in April and May 2021, at pre-application stage.
- 3.49. This included: letters, adverts in 2 x local newspapers and leaflet to 4,400 local residents and businesses inviting comment on emerging proposals and publicising two webinars; a dedicated section on the applicant's website with information about the emerging proposals and feedback from and 2 x webinars, with 8 and 34 attendees. Emerging proposals were also discussed at the applicant's regular Business and Community Liaison Group (BCLG).
- 3.50. In total, 5 people responded formally using an online feedback form and 11 people provided written comments by email. Comments included 3 mainly positive responses in relation to public spaces and 3 mainly positive responses in relation to mix of uses. There were 2 negative comments in relation to proposed density and 2 negative comments in relation to impact on services.
- 3.51. There were 2 comments in relation to heritage (1 positive and 1 negative). Others visited the consultation website (2,195 unique site visitors) and downloaded PDF 'exhibition boards' with detailed information for each site (109 times for the Printworks site) (09/06/21 statistics).
- 3.52. The permitted proposals were considered by Haringey's Quality Review Panel (QRP) on 15 December 2020 and 18 May 2021. The proposals were then presented to the Planning Sub-Committee at pre-application stage on 24 May 2021. The scheme was also presented at a Development Management Forum (DMF) on 25 May 2021.
- 3.53. Given the evolution of the scheme from the extant consents and the retention of the overarching design principles and approach, the above engagement remains relevant to the current application.
- 3.54. To support this previous engagement, the applicant has presented the revised proposals to the BCLG on 15th August 2023 with the presentation

subsequently circulated to those who attended alongside the wider BCLG Group. The applicant has stated that the presentation was positively received.

- 3.55. Given the similarity between the extant permission and the current proposal, the stated level of community involvement is considered to be satisfactory.

5. CONSULTATION RESPONSE

5.1. The following were consulted regarding the applications:

Internal Consultees

- LBH Building Control
- LBH Carbon Management (Energy and Sustainability)
- LBH Conservation Officer
- LBH Design Officer
- LBH Economic Regeneration
- LBH Employment and Skills
- LBH Housing Design & Major Projects
- LBH Lead Local Flood Authority/Drainage
- LBH Nature Conservation
- LBH NHS Haringey
- LBH Planning Policy
- LBH Pollution & Air Quality/Contaminated Land
- LBH Tottenham Team North - Regeneration
- LBH Transportation
- LBH Tree Officer
- LBH Waste Management (Cleansing)

External Consultees

- Active Travel England
- Affinity Water
- Arriva London
- Cadent Gas / National Gas Transmission assets
- Environment Agency
- Georgian Group
- Greater London Authority
- Greater London Archaeology Advisory Service (GLAAS)
- Historic England
- HSE Planning Gateway One
- London Fire Brigade
- Metropolitan Police - Designing Out Crime Officer
- National Grid
- Natural England
- NHS London Healthy Urban Development Unit
- Residents Associations (Cannon Road RA; Headcorn, Tenterden, Beaufoy & Gretton RA; Northumberland Park RA; Love Lane Residents Association & Love Lane RA (TAG))
- Thames Water

- Tottenham Civic Society
- Tottenham CAAC
- Transport for London
- Tree Trust for Haringey
- UK Power Networks

5.2. Below is an officer summary of the responses received. The full text of internal and external consultation responses is contained in Appendix 4.

Internal:

Building Control (HBC) – The fire strategy is satisfactory. From a fire point of view, the strategy is very advanced and clearly meets all the requirements from a Planning point of view.

Carbon Management – Appropriate planning conditions and s106 obligations have been recommended following a range of clarifications and amendments.

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

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

Design Officer - The previous approval was considered a well thought through and elegantly designed response to this site. The different use now proposed, is in principle a use compatible with this emerging town centre location, the wider masterplans and nearby applications previously approved and adopted and the heritage significance of this sensitive stretch of the High Road.

The design of this PBSA is a very convincing form of student accommodation. Its amenity for residents, practical design and impacts on neighbours are shown to be acceptable.

Conditions are recommended to ensure public realm is indistinguishable from the public realm created by the wider masterplans, with matching surface treatments and street furniture.

Lead Local Flood Authority – Content with the submission, and if the proposed scheme is constructed and maintained as per the submitted Drainage Strategy report, we are satisfied that the impact of surface water drainage has been appropriately addressed.

Pollution – No objection, subject to conditions on Land Contamination, Unexpected Contamination, NRRM and Demolition/Construction Environmental Management Plans.

Transportation – Following satisfactory responses to queries, no objection subject to recommended conditions and s106 obligations.

Tree Officer – From an arboricultural point of view, I hold no objections to the submitted landscape plans showing the courtyard and entrance planting. The tree species choice has good urban fitness and interest. An aftercare plan to establish the trees and plantings should be secured by condition.

Waste Management – The applicant has addressed initial concerns raised regarding the amount of storage space for refuse. There would be sufficient space to store waste for at least 4 days.

External:

- Affinity Water
- Arriva London
- Environment Agency
- Georgian Group
- Greater London Authority
- Greater London Archaeology Advisory Service (GLAAS)
- Historic England
- HSE Planning Gateway One
- London Fire Brigade
- Metropolitan Police - Designing Out Crime Officer
- National Grid
- Natural England
- NHS London Healthy Urban Development Unit
- Residents Associations (Cannon Road RA; Headcorn, Tenterden, Beaufoy & Gretton RA; Northumberland Park RA; Love Lane Residents Association & Love Lane RA (TAG))
- Thames Water
- Tottenham Civic Society
- Tottenham CAAC
- Transport for London
- Tree Trust for Haringey
- UK Power Networks

Active Travel England – Given the role of Transport for London (TfL) in promoting and supporting active travel through the planning process, Active Travel England (ATE) will not be providing detailed comments on development proposals in Greater London at the current time.

Cadent Gas / National Gas Transmission assets – Regarding planning application HGY/2023/2306, there are no National Gas Transmission assets affected in this area.

Greater London Archaeology Advisory Service (GLAAS) – The development could cause harm to archaeological remains and field evaluation is needed to determine appropriate mitigation. In this case, given the nature of the development, the archaeological interest and/or practical constraints are such that a two-stage archaeological condition could provide an acceptable safeguard.

Health & Safety Executive (HSE) – Content: Following a review of the information provided in the planning application, HSE is content with the fire safety design as set out in the project description, to the extent it affects land use planning considerations.

Historic England – Historic England have authorised the Local Planning Authority (LPA) to determine the application for listed building consent (HGY/2023/2307) as they see fit. They suggested that the LPA seek the views of their specialist conservation advisers in the determination of both the application for planning permission and the application for listed building consent.

Metropolitan Police - Designing Out Crime Officer (DOCO) – No objection, subject to a planning condition requiring the applicant to identify how the development can achieve 'Secured by Design' (SBD) Accreditation prior to the commencement of above ground works and obtain SBD accreditation prior to occupation.

National Grid – there are no National Grid Electricity Transmission assets affected in this area.

NHS London Healthy Urban Development Unit – A planned health centre as part of the THFC stadium development is not guaranteed. In advance of this opening, further capacity is needed and following the pandemic there has been significant pressure on hospital and acute services, including mental health, and therefore mitigation from the development is necessary – The request is the Council secure £151,530.00 within the s106 agreement to be paid on commencement and indexed linked to building costs (based on the HUDU Planning Contributions Model).

Thames Water – No objections subject to conditions relating to submission of a Piling Method Statement, ensuring improved water network infrastructure / CLEAN water capacity to serve the development, and guaranteeing an acceptable minimum pressure/flow rate.

Transport for London (TfL) – Support for proposed ‘car free’ development and the proposed level of disabled and cycle parking (albeit additional sites for disabled parking should be identified should demand arise). Road Safety Audits are required. TfL wants the applicant to address concerns relating to likely destinations of the future residents, development impact to the London Overground (LO), and impact on all the transport modes and surrounding transport services to ensure that the proposal would be London Plan compliant and would not result in an unacceptable impact to the strategic road network (SRN) and local transport network (including public transport services).

5. LOCAL REPRESENTATIONS

5.1. On 18 September 2023, notification was sent to the following:

- 488 Letters to neighbouring properties
- 3 site notices (for HGY/2023/2306) & 1 (for 2307 [LBC]) erected in the vicinity of the site.

5.2. The number of representations received from neighbours, local groups etc. were as follows:

No of individual responses: 4.

Objecting: 4.

Supporting: 0.

Others: 0.

5.3. The main issues raised in representations from adjoining occupiers are summarised below.

Objections:

- The scheme would involve the demolition of homes and homes should be for residents not students.
- The development is unnecessarily large and poorly designed
- Concern with pressure on infrastructure
- The destruction and demolition of locally listed buildings is against council policy
- The area does not need a large number of student rooms which will not provide amenities for existing residents
- This revised proposal removes the cinema which would be a great asset for the area

Officer response:

- *The scheme would involve the demolition of 829 High Road which comprises of a commercial unit at ground floor level and a flat above. This much altered and as a consequence, now a poorly designed Edwardian building that has lost most of its original features and has low heritage value must be demolished to enable appropriate vehicle (including firefighting) and pedestrian access to the site which is currently poorly maintained and insufficient to provide public access and to maximise the importance of Brunswick Square as a key east-west pedestrian route that connects the High Road with the remainder of the masterplan area to the west.*
- *There is a need for student accommodation and whilst homes would be lost, student accommodation still contributes to housing need and overall, there would be a significant uplift in living*

accommodation as part of these proposals. The rest of the allocation would deliver many homes to replace the small amount that may be lost because of building proposals.

- *The proposal has been designed so that it respects the heritage assets on the high road with sympathetically sized and designed buildings located near to listed and locally listed buildings. The proposal then steps up in height and bulk as it moves further away from those buildings to optimise the site and deliver as much commercial and accommodation floorspace as possible.*
- *The proposals include 35% affordable student accommodation that would benefit students on lower incomes.*
- *Overall, the heritage and public benefits would outweigh the low level of less than substantial harm to the significance of the Conservation Area resulting from the erection of new, larger buildings at the back of the High Road and the proposed demolition of the locally listed building at 829 High Road.*
- *The proposed student accommodation would be well designed, with high quality open spaces. The scheme would deliver an improved public realm to the adjacent streets. The other permissions in the masterplan have identified that there would be sufficient school and doctor provision for the emerging resident population in the area.*
- *The removal of the cinema is unfortunate , but the applicant has advised that this would not be deliverable without a suitable operator on board. In any event, the revised proposal is policy compliant and forms part of an investment in the area that would deliver accommodation for students, commercial spaces, and an improved public realm.*

6. MATERIAL PLANNING CONSIDERATIONS

6.1 The main planning issues raised by the proposed development are:

1. Background (6.2)
2. Principle of the Development (6.3)
3. Policy Assessment (6.4)
4. Affordable Housing (6.5)
5. Development Design (6.6)
6. Accommodation Quality (6.7)
7. Social and Community Infrastructure (6.8)
8. Heritage Conservation (6.9)
9. Impact on Amenity of Adjoining Occupiers (6.10)
10. Transportation and Parking (6.11)
11. Energy, Climate Change and Sustainability (6.12)
12. Flood Risk, Drainage and Water Infrastructure (6.13)
13. Air Quality (6.14)
14. Trees (6.15)
15. Urban Greening and Ecology (6.16)
16. Waste and Recycling (6.17)
17. Land Contamination (6.18)
18. Archaeology (6.19)
19. Fire Safety and Security (6.20)
20. Equalities (6.21)
21. Conclusion (6.22)

6.2 Background

- 6.2.1 Whilst the current application is for a new scheme the applicant has sought to retain the built form of the previous permission and consent (HGY/2023/2306 & 2307) as much as possible whilst making modifications as necessary to accommodate the change to PBSA and the removal of the cinema.
- 6.2.2 These changes have resulted in the second podium courtyard/garden to the western end of the site being dropped down to ground floor level in the current scheme allowing a level link to Brunswick Square from that courtyard.
- 6.2.3 The central section of the building facing Peacock Industrial Estate to the west has also been raised by a storey to 6-storeys. There are also additions in several places towards the western elevation to accommodate the increase in floorspace and to provide suitable layouts for the change to student accommodation.
- 6.2.4 The basement has been removed from the current proposals. This is due to the lower requirement for blue badge parking required by the London Plan. There are also several other elevational alterations to serve the student

accommodation. Some massing has been added to the western end of the proposal and the set-back upper floor levels have been enlarged.

- 6.2.5 Entrances to different clusters have been included on the western elevation to provide activation akin to the maisonettes within the extant scheme. The balconies in the extant scheme have been removed due to there not being a requirement for private amenity space attached to student bedrooms.
- 6.2.6 The images below show comparisons between the extant and proposed schemes and indicate the changes. They show that there are minimal changes to the High Road heritage frontage with the main changes being the inclusion of the open courtyard behind the High Road buildings and the additional massing and elevational changes to the western edge to accommodate the floorspace increases.
- 6.2.7 The revised proposal must be considered in light of this extant permission.
- 6.2.8 Please see the next pages for the images.

Figure 05: Images of the extant scheme from (Clockwise) the High Road, a view looking southeast, a roof plan, and a view from the future Peacock Park; and then the same images/views for the proposed scheme.



FIGURE 77. View of the Scheme from the High Road



FIGURE 78. View Looking South East



FIGURE 80. Rendered Roof Plan



FIGURE 79. View of the Scheme from Peacock Park



Figure 06: A raised view of the extant scheme looking southeast; and then the same view for the proposed scheme.



Figure 07: Street view of the extant scheme looking northeast; and then the same view for the proposed scheme.



Figure 08: Northern Brunswick Square elevation for the extant scheme; and then the same elevation for the proposed scheme.



Figure 09: Southern Percival Court elevation for the extant scheme; and then the same elevation for the proposed scheme.

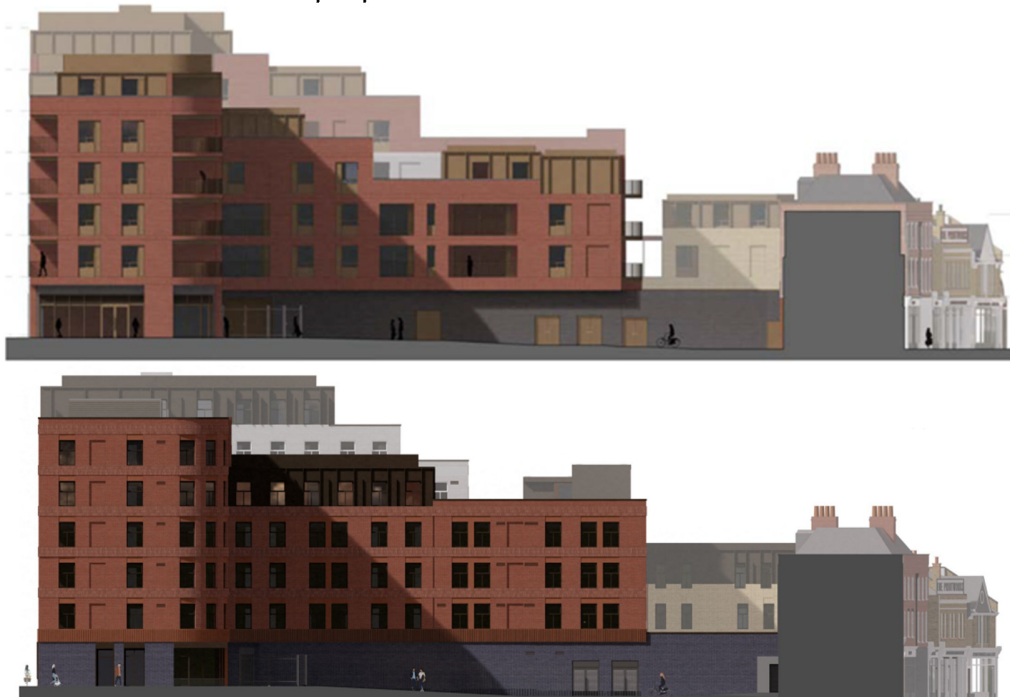
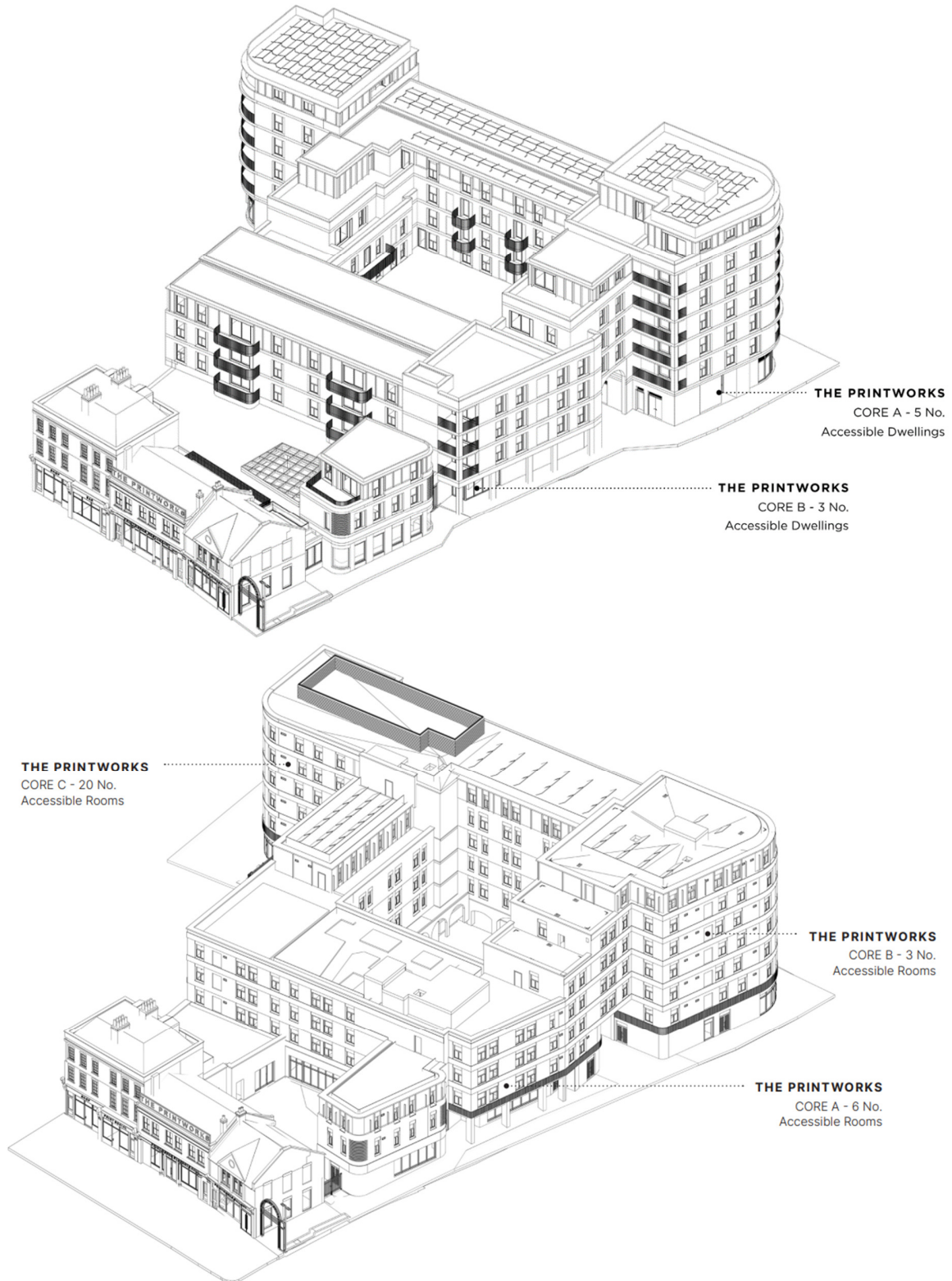


Figure 10: Isometric drawing of the extant scheme (looking west); and then the same isometric drawing for the proposed scheme [the images also show the accessible accommodation locations].



6.3 Principle of the development

6.3.1 *Policy Background*

6.3.2 The current National Planning Policy Framework NPPF was last updated on 5 September 2023. The NPPF establishes the overarching principles of the planning system, including the requirement of the system to “drive and support development” through the local development plan process.

6.3.3 *The Development Plan*

6.3.4 For the purposes of S38(6) of the Planning and Compulsory Purchase Act 2004 the Local Plan comprises the Strategic Policies Development Plan Document (DPD), Development Management Policies Development Plan Document (DM DPD) and Tottenham Area Action Plan (TAAP) and the London Plan (2021).

6.3.5 A number of plans and strategies set the context for Tottenham’s regeneration. These documents should be read in conjunction with the TAAP. The application site is located within a strategically allocated site - NT5 (High Road West) of the Tottenham Area Action Plan. A key policy requirement of the site allocation is that proposed development within NT5 should accord with the principles set out in the most up-to-date Council-approved masterplan. This is the High Road West Masterplan Framework (HRWMF), which is discussed in detail below.

6.3.6 The Council is preparing a new Local Plan and consultation on a Regulation 18 New Local Plan First Steps documents took place between 16 November 2020 and 1 February 2021. The First Steps document sets out the key issues to be addressed by the New Local Plan, asks open questions about the issues and challenges facing the future planning of the borough and seeks views on options to address them. It has very limited material weight in the determination of planning applications at this time.

The London Plan

6.3.7 The London Plan is the overall strategic plan for London, setting out an integrated economic, environmental, transport and social framework for the development of London over the next 20–25 years. The London Plan (2021) sets a number of objectives for development through various policies. The policies in the London Plan are accompanied by a suite of Supplementary Planning Guidance (SPGs) and London Plan Guidance that provide further guidance.

Upper Lea Valley Opportunity Area Planning Framework

6.3.8 The Upper Lea Valley Opportunity Area Planning Framework (OAPF) (2013) is supplementary guidance to the London Plan. A Development Infrastructure

Study (DIFS) in relation to the OAPF was also prepared in 2015. The OAPF sets out the overarching framework for the area, which includes the application site.

- 6.3.9 The OAPF notes the redevelopment of the High Road West area is supported by a comprehensive masterplan. The OAPF sets out the ambitions for the High Road West area to become a thriving new destination for north London, with a sports, entertainment and leisure offer supported by enhanced retail, workspace and residential development.

The Local Plan

- 6.3.10 Haringey's Local Plan Strategic Policies sets out the long-term vision of how Haringey, and the places within it, should develop by 2026 and sets out the Council's spatial strategy for achieving that vision. The Site Allocations development plan document (SA DPD) and Tottenham Area Action Plan (TAAP) give effect to the spatial strategy by allocating sufficient sites to accommodate development needs.

Strategic Policies

- 6.3.11 The site is located within the Northumberland Park Area of Change as per Haringey's Local Plan - Spatial Strategy Policy SP1. The Spatial Strategy makes clear that in order to accommodate Haringey's growing population, the Council needs to make the best use of the borough's limited land and resources. The Council will promote the most efficient use of land in Haringey.
- 6.3.12 Policy SP1 requires that development in Growth Areas maximises site opportunities, provides appropriate links to, and benefits for, surrounding areas and communities, and provides the necessary infrastructure and is in accordance with the full range of the Council's planning policies and objectives.

Tottenham Area Action Plan (TAAP)

- 6.3.13 The TAAP sets out a strategy for how growth will be managed to ensure the best quality of life for existing and future Tottenham residents, workers, and visitors. The plan sets area wide, neighbourhood and site-specific allocations.
- 6.3.14 The TAAP indicates that development and regeneration within Tottenham will be targeted at four specific neighbourhood areas including North Tottenham, which comprises Northumberland Park, the Tottenham Hotspur Stadium and the High Road West area.

NT5 Site: High Road West

- 6.3.15 The site allocation for the wider area (NT5 – High Road West) covers approximately 11.69ha and calls for a master planned, comprehensive

development creating a new residential neighbourhood (with a net increase of 1,200 dwellings) and a new leisure destination for London. The residential-led mixed-use development is expected include a new high-quality public square and an expanded local shopping centre, as well as an uplift in the amount and quality of open space and improved community infrastructure.

6.3.16 Site Allocation NT5 contains site requirements, development guidelines and sets out the steps for undertaking estate renewal. These are set out below. The application of relevant site requirements, development guidelines and estate renewal steps to the application site is set out in the sections following.

NT5 Site Requirements

- The site will be brought forward in a comprehensive manner to best optimise the regeneration opportunity.
- Development should accord with the principles set out in the most up-to-date Council-approved masterplan.
- Creation of a new residential neighbourhood through increased housing choice and supply, with a minimum 1,400 new homes of a mix of tenure, type, and unit size (including the re-provision of existing social rented council homes, the offer of alternative accommodation for secure tenants, and assistance in remaining within the area for resident leaseholders from the Love Lane Estate).
- Creation of a new public square, connecting an enhanced White Hart Lane Station, and Tottenham High Road, to complement the redeveloped football stadium.
- New retail provision to enlarge the existing local centre, or create a new local centre, opposite to and incorporating appropriate town centre uses within the new stadium, including the new Moselle public square. This should complement not compete with Bruce Grove District Centre.
- Enhance the area as a destination through the creation of new leisure, sports and cultural uses that provide seven day a week activity.
- Improve east-west pedestrian and cycling connectivity with places such as the Northumberland Park Estate and Lee Valley Regional Park.
- The site lies within the North Tottenham Conservation Area and includes listed and locally listed buildings. Development should follow the principles under the 'Management of Heritage Assets' section of the APP.
- Where feasible, viable uses should be sought for existing heritage assets, which may require sensitive adaptations and sympathetic development to facilitate.
- Deliver new high-quality workspace.
- Increase and enhance the quality and quantity of community facilities and social infrastructure, proportionate to the population growth in the area, including:

- A new Learning Centre including library and community centre;
- Provision of a range of leisure uses that support 7 day a week activity and visitation; and
- Provision of a new and enhanced public open space, including a large new community park and high-quality public square along with a defined hierarchy of interconnected pedestrian routes.

NT5 Development Guidelines

- Produce a net increase in the amount and the quality of both public open space and private amenity space within the area.
- To deliver transport improvements including a new, safe and attractive entrance to White Hart Lane Station and improved rail connectivity.
- Re-provision of employment floorspace lost as a result of the redevelopment as new leisure, sports and cultural floorspace and as modern, flexible workspaces.
- This could be achieved by workspaces with potential to connect to High Road retail properties, and/or through the creation of workspace behind the High Road and the railway arches.
- This central portion of the site is in an area of flood risk, and a Flood Risk Assessment should accompany any planning application.
- This site is identified as being in an area with potential for being part of a Decentralised Energy (DE) network. Development proposals should be designed for connection to a DE network and seek to prioritise/secure connection to existing or planned future DE networks, in line with Policy DM22.
- Create a legible network of east-west streets that connect into the surrounding area, existing lanes off the High Road, and open spaces.
- Establish clear building frontages along the High Road and White Hart Lane to complement the existing character of the Local Centre.
- Incorporate a range of residential typologies which could include courtyard blocks of varying heights and terraced housing.
- In the part of the site facing the new stadium, development should respond to both the existing High Road Character and the greater heights and density of the new stadium. This needs to be carefully considered given the height differential between the existing historic High Road uses and future stadium development.
- Larger commercial and leisure buildings should be located within close proximity to the new public square linking the station to the stadium.
- Due to the size of the site and scale of development envisaged, particular consideration of the effect of the works on the nearby communities, including how phasing will be delivered. This is referenced in the High Road West Masterplan Framework (HRWMF).
- Where development is likely to impact heritage assets, a detailed assessment of their significance and their contribution to the wider

conservation area should be undertaken and new development should respond to it accordingly.

- The Moselle runs in a culvert underneath the site [*although not this part*] and will require consultation with the Environmental Agency.

6.3.17 The THFC Stadium is the first stage of wider regeneration, and the intention is for it to be fully integrated within the comprehensive regeneration of High Road West and Northumberland Park. The priority is to ensure that on event and non-event days, the area is lively and attracts people to make the most of the stadium development, the High Road, and wider urban realm improvements that will take place as part of this development. Provision is therefore proposed for new community facilities and leisure orientated retail development to further build and cement the area's reputation as a premier leisure destination within North London.

High Road West Master Plan Framework (HRWMF)

6.3.18 Policy AAP1 (Regeneration and Master Planning) indicates that the Council expects all development proposals in the TAAP area to come forward comprehensively to meet the wider objectives of the TAAP. To ensure comprehensive and coordinated development is achieved, masterplans will be required to accompany development proposals which form part of a Site Allocation included in the TAAP.

6.3.19 The current approved High Road West Master Plan Framework (HRWMF) is that prepared by Arup in September 2014. This highlights opportunities for improvement and change in the subject area and identifies where housing, open space and play areas, as well as community, leisure, education and health facilities and shops could be provided. The HRWMF also helps to demonstrate how the growth and development planned for High Road West could be delivered through strategic interventions over the short to longer term.

6.3.20 The Council has entered into partnership with Lendlease and hybrid permission for the High Road West (HRW) redevelopment has been approved under reference HGY/2021/3175. in August 2022.

6.3.21 Other development plan designations include:

- North Tottenham High Road Conservation Area and an Archaeological Priority Area;
- Locally Listed Buildings (823 - 829 High Road);
- Grade II Listed Building (819-821 High Road);
- Northumberland Park Growth Area;
- Family Housing Protection Zone;
- A defined Tall Buildings Growth Area; and

- Critical Drainage Area.

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

5 Year Housing Land Supply

6.3.23 The Council at the present time is unable to fully evidence its five-year supply of housing land. The 'presumption in favour of sustainable development' and paragraph 11(d) of the NPPF should be treated as a material consideration when determining this application, which for decision-taking means granting permission unless the application of policies in the NPPF that protect areas or assets of particular importance provides a clear reason for refusal or any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in the NPPF taken as a whole.

6.3.24 Nevertheless, decisions must still be made in accordance with the development plan (relevant policies summarised in this report) unless material considerations indicate otherwise (of which the NPPF is a significant material consideration).

6.4 Policy Assessment

Principle of Comprehensive Development

6.4.1 Policy AAP1 (Regeneration and Master Planning) makes clear that the Council expects all development proposals in the TAAP area to come forward comprehensively to meet the wider objectives of the TAAP. It goes on to state that to ensure comprehensive and coordinated development is achieved, masterplans will be required to accompany development proposals which form part of a Site Allocation included in the TAAP and that applicants will be required to demonstrate how any proposal:

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

6.4.2 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".

- 6.4.3 Policy NT5 makes clear that ‘development should accord with the principles set out in the most up-to-date Council approved masterplan’, which as discussed above, is the approved HRWMF prepared by Arup in September 2014. This is therefore an important material consideration when determining planning applications.
- 6.4.4 Paragraph 4.6 of the TAAP states that Haringey wants to ensure development proposals do not prejudice each other, or the wider development aspirations for the TAAP Area whilst enabling the component parts of a site allocation to be developed out separately. The various sites north of White Hart Lane are expressly set out in Table 2 of Policy AAP1 as requiring a comprehensive redevelopment approach.
- 6.4.5 Paragraph 4.9 of the TAAP states that a comprehensive approach to development will often be in the public interest within the TAAP area. It goes on to state that whilst incremental schemes might be more easily delivered, the constraints proposed by site boundaries, neighbouring development or uses and below-ground services all have potentially limiting consequences for scale, layout and viability.
- 6.4.6 Although the HRMF seeks to ensure that the site is brought forward in a comprehensive manner, the phasing provisions of the HRWMF explicitly recognise existing land ownership. Indeed, Phase 1A (Cannon Road area) was delivered independently.
- 6.4.7 This acknowledgement that component parts of site allocations may be progressed separately (subject to them not prejudicing the delivery of the Site Allocation and HRWMF) was confirmed by the Goods Yard Appeal Decision in June 2019 and again by the Council’s decision to grant permission for the extant Depot consent in September 2020.
- 6.4.8 The applicant is proposing to develop four parts of Site Allocation NT5 that it owns (this site, the Goods Yard, the Depot, and No. 807 High Road). This application is supported by a masterplan that demonstrates that the development of the site could be satisfactorily developed without prejudicing the delivery of the wider Site Allocation NT5.

Contribution to housing stock

- 6.4.9 Following the publication of the London Plan in March 2021 the Council’s annual housing target increased to 1,592 homes.
- 6.4.10 Policy SP2 states that the Council will maximise the supply of additional housing to meet and exceed its minimum strategic housing requirement.

- 6.4.11 The TAAP identifies and allocates development sites with the capacity to accommodate new homes. The wider High Road West area is allocated in the TAAP (NT5) as an appropriate place for residential development alongside a mix of other uses and the TAAP calls for a minimum of 1,400 homes and a net increase of 1,200 homes. Of the 1,400 dwellings anticipated, 222 homes have already been developed in the form of the Cannon Road housing area (HGY/2012/2128). This leaves 1,178 dwellings still to be provided.
- 6.4.12 Given the above, the principle of the provision of new homes on the site (alongside a mix of other uses) is acceptable. Whilst student accommodation does not fall under Class C3 it is still counted towards the supply of housing.
- 6.4.13 The London Plan Policy H15 identifies that accommodation for students should count towards meeting housing targets on the basis of a 2.5:1 ratio, with two and a half bedrooms/units being counted as a single home.
- 6.4.14 The proposed scheme would therefore deliver the equivalent of 114 new homes based on this ratio and result in the loss of 13 existing homes. The proposals would therefore result in a net gain of 101 homes and make a welcome contribution towards delivering the outstanding requirement for Site NT5 and the borough's overall 10-year housing target.
- 6.4.15 The extant permission for the site proposed the delivery of 72 new homes and the loss of 13 existing homes (a net gain of 59 homes) so this proposal represents an improvement in terms of housing delivery compared to the previous approval.

Principle of Provision of Purpose-Built Student Accommodation (PBSA)

- 6.4.16 Policy DM15 of the DM DPD supports proposals for PBSA in growth areas, within or at the edge of a town centre, and in an area of good public transport accessibility. The proposal meets these requirements, the application site is located in a Growth Area and has a high PTAL of 4-5 indicating that its access to public transport is very good.
- 6.4.17 As the site allocation (NT5) is brought forward the immediate area would also become an expanded local shopping centre and vibrant leisure destination – which, whilst not strictly a town centre, would incorporate appropriate town centre uses to complement but not compete with Bruce Grove District Centre to the south along the High Road. As such, student accommodation with ground floor commercial spaces would be an appropriate use in this location.
- 6.4.18 Proposals also need to demonstrate that they would not result in a loss of housing. Again, when considered in the round, the proposals would result in an increase in housing overall given the uplift in accommodation proposed.

- 6.4.19 Policy DM15 of the DM DPD also requires there to be no adverse impact on local amenity, that the accommodation is of a high-quality design including consideration for unit size, daylight & sunlight, and provision is made for students with disabilities. These will be assessed in later sections of this report.
- 6.4.20 The final parts of DM15 part D requires student accommodation schemes to demonstrate the need for the additional bedspaces and ensure the accommodation can be secured by agreement for occupation by members of a specified educational institution(s), or, subject to viability, the proposal will provide an element of affordable student accommodation in accordance with Policy DM13 (40% affordable housing provision).
- 6.4.21 London represents the largest student housing market in the UK – and Europe – with c.400,000 full time students studying across over 40 major universities, as well as those at smaller institutions. Whilst London has a large purpose-built student housing market, it does not come close to providing the amount of accommodation required to house London's students, with c.310,000 students having to find accommodation outside of this purpose-built sector.
- 6.4.22 The applicant has engaged in discussion with Middlesex University who have expressed interest in the proposal to supplement their existing stock of student accommodation. The applicant states in the submission that several meetings were held to develop the project to Middlesex University's requirements, resulting in their providing a letter of support for the scheme.
- 6.4.23 The applicant has agreed to the use of the accommodation being secured for students and the majority of the bedrooms in the development including all of the affordable student accommodation bedrooms being secured through a nomination agreement for occupation by students of one or more higher education provider.
- 6.4.24 The proposal will provide an element of affordable student accommodation. The applicant is proposing 35% on site affordable student accommodation which complies with London Plan Policy H15 and is discussed in more detail below.
- 6.4.25 Part A of London Plan policy H15 requires boroughs to seek to ensure that local and strategic need for PBSA is addressed subject to 5 criteria which will be outlined and assessed below. Part B encourages boroughs, student accommodation providers and higher education providers to develop student accommodation in locations well-connected to local services by walking, cycling and public transport, as part of mixed-use regeneration and redevelopment schemes.

1) Mixed and inclusive neighbourhood

- 6.4.26 London Plan policy H15 supports proposals for PBSA, provided that at the neighbourhood level, the development contributes to a mixed and inclusive neighbourhood. The application site lies within the High Road West (HRW) regeneration area, as identified in the TAAP. HRW is allocated for a new residential neighbourhood and leisure destination which would include an expanded local shopping centre.
- 6.4.27 With regard to housing mix, the TAAP policy AAP3 Part D states that new homes in Tottenham should better address housing needs and secure a more inclusive and mixed, sustainable community. On a neighbourhood level for High Road West the TAAP (paragraph 5.126) states that:
- This site will deliver a new residential neighbourhood, which will provide high quality new homes for existing secure Council tenants living on the Love Lane Estate and provide better housing choice for existing and future residents. The development will build on the redevelopment of Tottenham Hotspur Football Club stadium and create a new vibrant leisure destination for London.*
- 6.4.28 The application site is within an expanded local shopping centre near to White Hart Lane Station and the bus connections of the High Road. Student units, are an appropriate form of housing for the site given family housing would be provided elsewhere in the site allocation under the various permissions, including replacement Council homes to the south of White Hart Lane under the outline element of hybrid planning permission HGY/2021/3175.
- 6.4.29 It is also recognised in the London Plan (paragraph 4.10.4) that the introduction of one-bed units reduces the pressure to convert and subdivide existing larger homes. Therefore, the ability for the proposed development to meet the needs of those that want to live in a purpose-built student environment has the potential to reduce the pressure on existing family homes in the immediate Tottenham area for use as flat shares for students.
- 6.4.30 Planning permissions for other parts of the site allocation propose homes that would help create the new residential neighbourhood. The current proposal would provide a form of accommodation that is currently not being provided for in the area. Given the location and its good access to public transport the site is well suited to PBSA development and would improve the housing choice for existing and future residents seeking student accommodation in Tottenham.
- 6.4.31 Given this context it is considered that the proposal would contribute to a mixed and inclusive neighbourhood and would provide a form of accommodation that would complement the housing currently being delivered in the site allocation and wider area as part of other permissions and consents.

2) *The use of the accommodation is secured for students.*

6.4.32 The s106 agreement would secure the use of the accommodation only for students only during the academic year. This would be sufficient to satisfy this policy requirement.

6.4.33 Whilst the accommodation would be secured for the use of students only during the academic year. Outside of the academic year the building could provide accommodation for conference delegates, visitors, interns on university placements, and students on short-term education courses or any similar use at any institution approved in advance in writing by the local planning authority, acting reasonably.

6.4.34 The temporary use shall not disrupt the accommodation of the resident students during their academic year. Any ancillary use described above shall only be for a temporary period each year and shall not result in a material change of use of the building.

6.4.35 This approach is encouraged by London Plan policy H15 which identifies that in order to enable providers of PBSA to maximise the delivery of affordable student accommodation, these alternative non-term-time uses increase the profitability of the development, boroughs should consider allowing the temporary use of accommodation during vacation periods for ancillary uses.

6.4.36 This would be particularly relevant in this instance given the presence of the stadium nearby and the commercial opportunities available to the owner of the proposed building outside of term time as a result – for letting to delegates for conferences etc.

3) The majority of the bedrooms in the development including all of the affordable student accommodation bedrooms are secured through a nomination agreement for occupation by students of one or more higher education provider.

6.4.37 The s106 agreement would ensure that this is secured which would be sufficient to satisfy this policy requirement.

6.4.38 As noted previously, the applicant has engaged in discussion with Middlesex University who have expressed interest in the proposed Printworks scheme to supplement their existing stock of student accommodation, resulting in their providing a letter of support for the scheme.

4) The maximum level of accommodation is secured as affordable student accommodation as defined through the London Plan and associated guidance:
a. to follow the Fast Track Route, at least 35 per cent of the accommodation must be secured as affordable student accommodation or 50 per cent where the development is on public land or industrial land appropriate for residential uses in accordance with Policy E7 Industrial intensification, co-location and substitution.

b. where the requirements of 4a above are not met, applications must follow the Viability Tested Route set out in Policy H5 Threshold approach to applications, Part E.

6.4.39 The London Plan sets out that to provide greater certainty, speed up the planning process and increase the delivery of affordable student accommodation, a threshold has been introduced for PBSA schemes to take advantage of the 'Fast Track Route'. To follow the 'Fast Track Route' the amount of affordable student accommodation provided should be at least 35 per cent of student bedrooms in the development.

6.4.40 The applicant has opted to follow the 'Fast Track Route' and provide 35 per cent of the accommodation as affordable student accommodation. As the required threshold for affordable student accommodation would be met, the scheme does not need to be considered under the Viability Tested Route (as described under Part E of Policy H5 Threshold approach to applications and the Mayor's Affordable Housing and Viability SPG) and the affordable housing provision is compliant with London Plan Policy.

6.4.41 Whilst the proposal would not meet the local 40% borough wide affordable housing target, the London Plan was adopted more recently than the Local Plan and is therefore its policies must be given great weight.

5) The accommodation provides adequate functional living space and layout.

6.4.42 Nationally Described Space Standards on minimum room and flat sizes do not apply to student accommodation. However, the plans indicate that the bedroom sizes proposed are more generous than typical room sizes for recent student accommodation developments in London and are considered to meet or exceed the needs of educational institutions.

6.4.43 The development proposes a range of accommodation typologies, including 'cluster bedrooms' where several rooms share a kitchen space, standard studios, and premium studios. Cluster bedrooms are all a minimum of 12.5sqm, studio bedrooms are split into two categories with standard and premium accommodation. The standard rooms are a minimum of 18sqm and the premium rooms a minimum of 24sqm.

6.4.44 As is expected in student housing, the individual rooms / units do not have private external amenity space. However, the development includes two generous external communal courtyards at ground floor level and a podium roof garden at 4th floor level.

6.4.45 Generous internal shared amenity space would be provided at ground floor level, illustrative drawings in the Design and Access Statement (DAS) indicate

that these spaces could include a large entrance/reception space, a laundry, a screening room, a breakout/games room, a study space, a café, and a gym.

6.4.46 Every room is provided with a toilet, shower, and basin; and the studios have basic cooking facilities in the form of a kitchenette. The premium studios also have a seating area. Shared living kitchen dining (LKD) areas would be provided for each cluster of bedrooms. A cluster would contain a maximum of 12 bedrooms with the associated LKD sized, proportionately, to suit so that sufficient kitchen space is provided for all rooms of accommodation.

6.4.47 Almost all units are inevitably single aspect, except for some corner units. As the layout currently follows the street pattern, some units will therefore be single aspect and north facing. Where rooms wrap around the corners of the proposed PBSA building, these windows generally facilitate communal living kitchen dining spaces or premium rooms. Dual aspect amenity spaces have been maximised for cluster units. Overall, the quality of private and communal accommodation is high for student housing.

Loss of Existing Housing

6.4.48 London Plan Policy H7 makes clear that loss of existing housing should be replaced by new housing at existing or higher densities with at least the equivalent level of overall floorspace.

6.4.49 The proposed scheme would deliver a net increase of floorspace for accommodation. As set out above Policy H1 of the London Plan, in the supporting text clarifies that non-self-contained accommodation for students should count towards meeting housing targets on the basis of a 2.5:1 ratio, with two and a half bedrooms/units being counted as a single home.. The proposed scheme would therefore deliver 114 new homes (net gain of 101 homes) based on this ratio. As such, the loss of the existing 13 homes would be acceptable in principle given the uplift and net gain of 101 homes.

Loss of Banqueting Suite

6.4.50 Policy DM49 of the DM DPD resists the loss of social and community facilities without replacement, (with the definition including education/training facilities, health facilities, community halls, places of worship and pubs). London Plan Policy S1 resists the loss of social infrastructure, with supporting paragraph 5.1.1 listing “health provision, education, community, play, youth, early years, recreation, sports, faith, criminal justice and emergency facilities”.

6.4.51 Policy SP10 of the Local Plan seeks to protect and enhance Haringey’s town centres, according to the borough’s town centre hierarchy and Policy DM41 of the DM DPD promotes new retail spaces in town centres. Policy DM44 of the DM DPD seeks to manage changes of use to shops in non-designated shopping

frontages, retain active frontages, and ensure that there are adequate alternative shopping facilities nearby. Site Allocation NT5 of the TAAP seeks to enlarge the existing North Tottenham Local Centre or create a new local centre and include leisure uses.

6.4.52 The existing banqueting suite can accommodate up to approx. 600 people and is a place of celebration, ceremony, and mourning that enables large numbers of friends and relatives to mark significant life events. However, whilst it could be considered to provide a 'distinctive use with a public benefit', it comprises a private commercial *Sui Generis* use that is not strictly 'publicly accessible' to the wider community and operates solely as a commercial business which is available for hire for private events only.

6.4.53 As such, officers do not consider that it comprises a community facility or piece of social infrastructure and that it is not protected by policy. During consultation on the extant scheme the Cannon Road Residents Group wrote to support this view and to point out the disturbance that the existing use causes.

Loss of Retail Uses

6.4.54 The site falls outside of the defined North Tottenham Local Centre and outside of a potential expanded Local Centre around a new Moselle Square (referred to in the HRWMF). Officers are satisfied that there is adequate retail provision in the existing nearby Local Centre and that proposals would retain appropriate active commercial and ancillary student uses on the ground floor of the High Road. As such, the potential loss of retail floorspace is considered acceptable.

Principle of Proposed Flexible Commercial Uses

6.4.55 TAAP Policy NT2 states the Council will support development which increases job density and therefore helps to meet the employment needs of the Borough and enables small firms to start up, and grow, in flexible industrial space. Site Allocation NT5 establishes indicative development capacities for commercial (4,350sqm) and town centre uses (11,740sqm) (16,090sqm overall).

6.4.56 The principles of the HRWMF seek to create a net increase in jobs and business opportunities in the area through an increase in commercial space and provision of a range of workspaces. The principles of the plan also seek to provide a range of retail and commercial units to encourage a greater mix and wider retail offer.

6.4.57 The proposed scheme includes 238sqm (GEA) of flexible commercial floorspace use (Class E). This is considered to contribute to NT5 allocated requirements for commercial uses and is generally consistent with guidance in the HRWMF.

6.4.58 The removal of the cinema in this current scheme is unfortunate, but the applicant has advised that this would not be deliverable without a suitable operator on board. In any event, the revised proposal is policy compliant and forms part of an investment in the area that would deliver accommodation for students, commercial spaces, and an improved public realm.

6.4.59 S106 planning obligations are also recommended to secure the implementation of an approved Employment and Skills Plan to maximise employment and training opportunities for residents from the development (including during the construction phase).

Principle of the Development – Summary

6.4.60 The provision of a student accommodation-led mixed-use scheme comprising PBSA, ancillary uses, and other commercial uses is acceptable in principle. The incremental development of Site Allocation NT5 is acceptable in principle, providing that the proposed development does not prejudice the future development of other parts of the site, allocation, or frustrate the delivery of Site Allocation NT5 or wider area outcomes sought by the site allocation.

6.4.61 The proposal would deliver a similar form of development to the extant permission, with a greater amount of housing albeit in the form of student accommodation. There would also not be a cinema in this scheme. However, there would be commercial units at the four corners of the development and activated frontages with PBSA rooms and ancillary uses occupying them.

6.4.62 It is considered reasonable to give a 5-year planning permission, rather than the standard 3-years. The Goods Yard and Depot extant consents allow for an implementation period of between 4 and 5-years and a 5-year life for any new permission would give more time for the applicant to work constructively with the Council's development partner Lendlease over development of land to the north of White Hart Lane.

6.5 Affordable Housing

Policy Background

6.5.1 London Plan Policy H15 identifies that for PBSA schemes the maximum level of accommodation shall be secured as affordable student accommodation as defined through the London Plan and associated guidance.

6.5.2 As noted above the London Plan states that to provide greater certainty, speed up the planning process, and increase the delivery of affordable student accommodation – a threshold has been introduced for PBSA schemes to take advantage of the 'Fast Track Route'. To follow the 'Fast Track Route' the

amount of affordable student accommodation provided should be at least 35 per cent of student bedrooms in the development.

- 6.5.3 To proposal commits to providing 35 per cent of the accommodation as affordable student accommodation to be secured through a s106 agreement. This would amount to 101 student bedspaces. These would be pepper potted throughout the scheme to achieve a fully accessible and integrated development.
- 6.5.4 Policy H15 of the London Plan also identifies that the affordable student accommodation bedrooms shall be allocated by the higher education provider(s) that operates the accommodation, or has the nomination right to it, to students it considers most in need of the accommodation.
- 6.5.5 Whilst the proposal would not meet the 40% target specified by Policy SP2 of the Council's Local Plan and DM13 of the DM DPD, given that the London Plan was adopted more recently and is therefore making Policy H15 of the London Plan the prevailing policy, the proposed level of affordable accommodation is acceptable. As the required London Plan threshold for affordable student accommodation would be met, it is not considered necessary for the scheme to need to be considered under the Viability Tested Route.
- 6.5.6 Whilst the extant permission for the site proposed 7 social rented homes and 16 intermediate (Total = 23), the proposals would not be able to incorporate low-cost rent housing as there would be difficulties in having a mix of homes and student accommodation.
- 6.5.7 Affordable student accommodation has also been proposed to comply with London Plan policy and utilise the fast track route which excludes the requirement for a late stage review (LSR). A LSR compares the viability assessment at application stage with actual achieved values and costs. If costs have gone down, and values up, then a further payment to the council would be required. If the original assessment was too pessimistic then a late payment to the local authority would be required, or additional on-site affordable accommodation would be sought to be delivered.
- 6.5.8 The applicant is currently in discussions with an operator who specialises in student accommodation who would not be able to run and manage the different forms of accommodation due to complexities with management.
- 6.5.9 Affordable wheelchair accessible rooms: The scheme has been designed to British Standard BS8300-2:2018, Design of an accessible and inclusive built environment, Buildings Code of practice, and therefore 10% (29 in total) of the units are wheelchair-accessible. The proposed accessible bedrooms are accommodated within the studio bedroom provision. Just under 35% of these 29 (10 bedrooms) would be affordable student accommodation.

6.5.10 Affordable Design & Management: All proposed accommodation has been designed so that they are 'tenure blind' and there would be no discernible difference in external appearance of affordable and market accommodation. The proposed affordable homes would be managed by the same operator, allocated by the higher education provider(s) that operates the accommodation / has the nomination right to it, and all residents would be able to access the same amenities and open space.

Affordability

6.5.11 To ensure students with an income equivalent to that provided to full-time UK students by state-funded sources of financial support for living costs can afford to stay in PBSA, the maximum number of bedrooms in PBSA are required to be affordable at this income level. The rental cost for this affordable student accommodation has been defined through the work of the Mayor's Academic Forum.

6.5.12 Affordable student accommodation is defined in the London Plan as a purpose-built student accommodation (PBSA) bedroom that is provided at a rental cost for the academic year equal to or below 55 per cent of the maximum income that a new full-time student studying in London and living away from home could receive from the Government's maintenance loan for living costs for that academic year.

6.5.13 The actual amount the Mayor defines as affordable student accommodation for the coming academic year is published in the Mayor's Annual Monitoring Report. The affordability of the affordable student accommodation would be secured through a s106 agreement.

6.5.14 Should the Government make significant changes to the operation of the maintenance loan for living costs as the main source of income available from the Government for higher education students, the Mayor will review the definition of affordable student accommodation and may provide updated guidance in the future. Review clauses would be included to the s106 to ensure that any updated guidance is picked up and applied to this scheme going forward.

6.5.15 The applicant has committed to ensuring that the affordable student accommodation bedrooms shall be allocated by the higher education provider(s) that operates the accommodation, or has the nomination right to it, to students it considers most in need of the accommodation. This would also be secured through the s106.

Viability Review

- 6.5.16 In accordance with London Plan Policy H5, it is recommended that s106 planning obligations secure an Early-Stage Viability Review. It is also recommended that these secure a Development Break Review – requiring a review if an approved scheme were implemented, but then stalled for 2 years or more. These reviews would ensure the applicant fully intends to build out the permission.
- 6.5.17 Early-Stage Review Mechanisms are essentially re-runs of the viability assessment process but at a later point post-permission and prior to completion of all units. Early reviews are engaged if a certain amount of progress has not been made onsite within several years.
- 6.5.18 These reviews compare the viability assessment at application stage with actual achieved values and costs. If costs have gone down, and values up, then a further payment to the council would be required. If the original assessment was too pessimistic then a later payment to the local authority would be required, or additional units would be required to be delivered as affordable so that the maximum viable amount can still be sought in the stated circumstances.

Affordable Housing – Summary

- 6.5.19 Officers consider that both the amount and type of proposed affordable accommodation are acceptable given that they comply with the London Plan, subject to approval of details and Early and Development Break viability Reviews.

6.6 Development Design

Policy Background

- 6.6.1 The NPPF makes beauty and placemaking a strategic national policy, includes an expectation that new streets are tree-lined and places an emphasis on granting permission for well-designed development and for refusing it for poor quality schemes, especially where it fails to reflect local design policies and government guidance contained in the National Design Guide (January 2021) and, where relevant, National Model Design Code (July 2021).
- 6.6.2 Local Plan Policy SP11 and Policy DM1 of the DM DPD are relevant to the design of developments. Policy DM1 of the DM DPD states that all development must achieve a high standard of design and contribute to the distinctive character and amenity of the local area.
- 6.6.3 Further, developments should respect their surroundings by being sympathetic to the prevailing form, scale, materials, and architectural detailing. Local Plan Policy SP11 states that all new development should enhance and enrich

Haringey's built environment and create places and buildings that are high quality, attractive, sustainable, safe, and easy to use.

- 6.6.4 London Plan Policy D9 requires that tall buildings are only developed in locations that are identified as suitable in Development Plans. It goes on to set out a number of visual, functional, and environmental impacts of tall buildings that should be considered in planning decisions.
- 6.6.5 The Local Plan (Strategic Policies 2013-2026) included a borough-wide definition of 'tall building' as being those which are substantially taller than their neighbours, have a significant impact on the skyline, or are of 10-storeys and over (or otherwise larger than the threshold sizes set for referral to the Mayor of London).
- 6.6.6 The Upper Lee Valley Opportunity Area Framework proposes that future tall buildings will generally be in well-defined clusters in identified urban growth centres. Strategic Policy SP11 of the Local Plan requires all new development to 'enhance and enrich Haringey's built environment and create places and buildings of high quality'.
- 6.6.7 Policy AAP6 of the Tottenham Area Action Plan states that, in line with DM6 of the DM DPD, Tottenham Hale and North Tottenham as growth areas have been identified as being potentially suitable for the delivery of tall buildings.
- 6.6.8 The HRWMF sets out the principle that tall buildings will only be considered in parts of the masterplan area where existing character would not be affected adversely by the scale, mass, or bulk of a tall building. The HRWMF envisages a "legible tall building spine" that descends from Brook House to create an appropriate heritage setting for statutorily listed and locally listed assets.
- 6.6.9 The HRWMF also sets the principles that tall buildings should be located to minimise overshadowing of adjacent development and used as part of a wayfinding and movement strategy (for example located towards the end of east-west routes). Key views of the stadium should be considered and maintained in the profile of buildings.
- 6.6.10 Haringey's Quality Review Panel (QRP) assessed the extant scheme twice prior to submission of the formal application (on 15 December 2020 and 18 May 2021). Whilst it is acknowledged that the extant scheme differs to that currently proposed, given the similarities in the design of the two schemes the following summary of QRP comments from these reviews and officer responses are set out in Table 03 below as they remain relevant.

Table 03: Summary of QRP comments & officer response:

QRP Comment	Officer Response
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<i>The 8-storey building at the back of the site at 819-829 High Road appears detrimental to the historic character of the area and should be rethought to address the more human scale of its context.</i>	The scale of the building has been reduced
<i>The panel welcomes the re-use and repair of the heritage buildings, particularly those along the High Road, and the commitment to understand their history. These heritage assets should underpin the character of the scheme, especially for the 819-829 High Road site, and should inform the buildings' massing.</i>	Noted. The proposals would deliver public benefits through re-use and repair and the scheme staggers in height away from these buildings to minimise harm.
<i>Further consideration should be given to the demolition of part of the locally listed building at 823-829 High Road. This extension contributes to the character of the Conservation Area and its removal will impact on the street frontage.</i>	Whilst this is acknowledged, this demolition is required to enable firefighting access. This building is also of a lower quality to the rest of the terrace and efforts would be made to reintroduce a sense of its presence through the gateway installation.
<i>The scheme should explore ways of enhancing the existing historic alley leading to Brunswick Square, without demolition to widen this to become a street.</i>	As above, this was considered but would not be possible due to other important requirements. Efforts have been made in the design to minimise the harm of this loss.
<i>The proposed roof extensions and Herald Yard development on the 819-829 High Road site should be sympathetic to the adjacent heritage buildings. There is not yet enough information to judge how successful this element of the scheme will be.</i>	The proposal has finessed the designs and reached a sympathetic conclusion that maximises the opportunities from the development whilst also delivering on other aims and objectives of the plan such as the preservation of heritage assets and their setting.
<i>In the Masterplan, public realm, and landscape design section of the 2nd review: This will be particularly relevant to the design of Brunswick Square. If the width of the space is increased by removing part of the building adjacent and setting back the building line, then this provides opportunities for a special landscape design approach in this important space</i>	The applicant has committed to funding the resurfacing of Brunswick Square and indicated their proposed landscaping strategy. Furthermore, efforts have been made to activate the elevations onto Brunswick Square and design layouts so that they protect internal privacy.

<i>that provides a key link between the High Road and the site. Consideration of the potential uses of this space would be welcomed, as this would help to define and enliven this important piece of public realm.</i>	
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Site Layout & guidance in the HRWMF

6.6.11 The HRWMF sets out the following relevant layout principles:

- Create a legible network of east-west streets that connect into the surrounding area, existing lanes off the High Road, pocket parks and other open spaces;
- Create attractive north-south links behind the High Road which connect public parks and squares, key public buildings, and the station;
- Complement the scale of the proposed street layout with appropriate building heights;
- Incorporate a range of residential typologies including courtyard blocks of varying heights and terraced housing;
- Demonstrate clear definition of fronts and back of buildings, public and private open spaces, and active street frontages; and
- Enhance the heritage value contribution of the High Road, reinforcing its fine grain and diversity of retail offer alongside improvements High Road frontages.

6.6.12 Officers consider that the Printworks application is generally based on the above layout principles as follows:

- It provides active frontages to Brunswick Square (to the north) and Percival Court (to the south);
- It allows for a future north-south route along its western boundary;
- It includes appropriate building heights (discussed further below);
- It includes courtyard blocks, albeit that the proposed fully enclosed courtyards are different from the open-sided courtyard envisaged);
- Buildings would have clear backs and fronts; and
- It would retain and refurbish the two Listed Buildings and most of the locally listed buildings on the High Road – although it would involve the demolition of the locally listed building at No.829 and the widening of Brunswick Square (discussed in detail under Heritage Conservation).

6.6.13 Figure 38 in the HRWMF sets out an overall indicative masterplan. The Goods Yard and Depot extant schemes have interpreted this and THFC's latest indicative masterplan revises this further as proposed in the Goods Yard-Depot application (reference HGY/2021/1771), which was allowed on appeal.

6.6.14 Figure 11 below sets out an extract from the HRWMF and the THFC's indicative masterplan. This shows that the layout of Printworks application scheme is broadly in accordance with the HRWMF masterplan in terms of how it would address Brunswick Square, Percival Court and the western boundary of the site.

Figure 11: HRWMF Figure 38 & THFC indicative masterplan:



Site Layout & the Interim Condition (with Peacock Industrial Estate) Relationship with existing and future development

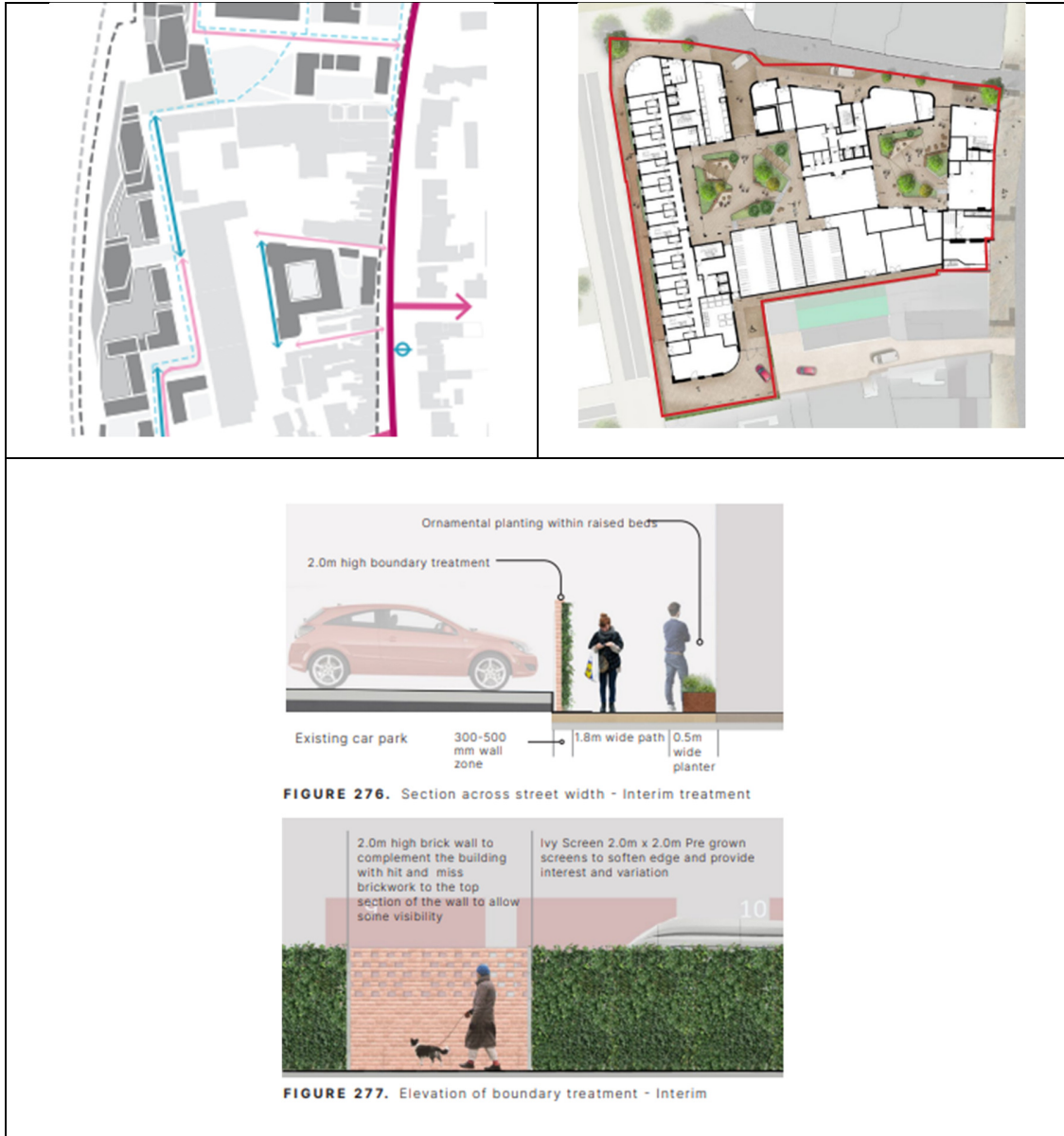
6.6.15 The Agent of Change principle set out in London Plan Policy D13 places the responsibility for mitigating impacts from existing noise and other nuisance-generating activities or uses on the proposed new noise-sensitive development.

6.6.16 In other words, the onus is on the applicant to demonstrate that its proposed development would not prejudice the continued operation of the existing nearby industrial and warehousing uses on the Peacock Industrial Estate. This principle can be extended to other matters – such as outlook, privacy and daylight and sunlight.

6.6.17 Figure 12 below sets out an extract from THFC's indicative masterplan in the Interim Condition (with Peacock Industrial Estate in place), the proposed Printworks layout and a cross section of the scheme showing the relationship between the existing Peacock Industrial Estate and the western edge of the site. This shows that proposed units in the western part of the Printworks building would be:

- Set back 2.3m from the site boundary (Peacock Mews);
- Set down approx. 0.3-0.5m below the level of the Peacock Industrial Estate car parking area (with a 2m high boundary wall);
- Set back approx. 18-21m from the industrial/warehousing units.

Figure 12: Proposed relationship with the existing Peacock Industrial Estate:



6.6.18 There would be ground floor commercial units at the northern and southern ends of the western arm of the proposed Printworks building, with 3 duplex clusters at ground and first floor in the middle (meaning that there would be front doors onto the street as well as ground floor bedrooms). The extant scheme had a similar arrangement albeit with front doors to maisonettes. This retains the principles of activating the elevation to avoid deadened frontages presenting onto road that may come forward as part of the delivery of the masterplan.

6.6.19 Officers are satisfied that the location, use and layout of the proposed buildings (together with the proposed boundary wall) would result in an acceptable relationship between proposed accommodation and existing industrial estate

and ensure an acceptable level of residential amenity for new residents which should not prejudice the continued operation of the existing uses.

Development Density

- 6.6.20 London Plan Policies H1 and D3 make clear that development must make the best use of land by following a design-led approach that optimises the capacity of sites (and no longer refers to a density matrix as a guide).
- 6.6.21 The policy states that a design-led approach requires consideration of design options to determine the most appropriate form of development that responds at a site's context and capacity for growth, and existing and planned supporting infrastructure capacity (as set out in Policy D2). In doing so it identifies a number of requirements in relation to form and layout, experience and quality and character.
- 6.6.22 A key principle of the HRWMF is to achieve appropriate residential densities corresponding to guidelines set out by the Mayor in relation to public transport accessibility levels.
- 6.6.23 The proposed scheme would have a similar density to the extant scheme and the Goods Yard & Depot scheme (reference HGY/2021/1771). The following issues are assessed in different sections of this report:
- Form and Layout – Development Design;
 - Experience – (safety, security, inclusive design, housing quality and residential amenity) – Development Design, Accommodation Quality, Impact on Amenity of Adjoining Occupiers and Fire Safety & Security;
 - Quality and character – Development Design;
 - Neighbour amenity – Impact on Amenity of Adjoining Occupiers;
 - Transport infrastructure – Transportation & Parking;
 - Green infrastructure– Trees and Urban Greening & Ecology; and
 - Social infrastructure – Social & Community Infrastructure.
- 6.6.24 In summary, the assessment in the above sections finds the proposed scheme to be acceptable, subject to securing necessary mitigation and officers are satisfied that the proposed amount of development does optimise the site's potential to successfully deliver new homes and jobs as part of a new higher density neighbourhood.

Amount, location, and type of Open Space

- 6.6.25 London Plan Policies D1-D3 and D8 requires high-quality public realm that takes account of environmental issues, including climate change, and provides convenient, welcoming, and legible movement routes and stresses the importance of designing out crime by optimising the permeability of sites,

maximising the provision of active frontages, and minimising inactive frontages. Policies DM2 and DM3 reflect this approach at the local level.

6.6.26 Whilst the site is almost entirely within the White Hart Lane Area of Open Space Deficiency (as identified in Figure 4.1 of the Development Management DPD), it is less than 1 hectare in size and so Policy DM20 of the DM DPD does not require the creation of additional publicly accessible open space.

6.6.27 A development guideline in Site Allocation Policy NT5 and a key principle of the HRWMF is the production of a net increase in the amount and the quality of public open space. The HRWMF identifies broad building typologies to frame open space, and the Site Allocation calls for the creation of open space in addition to the creation of a legible network of east-west streets that connect into the surrounding area and the existing lanes off the High Road.

6.6.28 The HRWMF proposes 39,400sqm of open space in total (including publicly accessible open space, children's play space, five-a-side playing pitch and allotments), compared to 21,000 sqm of open space in the NT5 site area currently (an increase of 80%).

6.6.29 The proposed scheme includes provision for 1,661sqm of open space in total, as follows:

- Brunswick Square - public highway/public realm (additional approx. 354sqm);
- Percival Court-private Street (approx. 331sqm) (this would become public realm in the masterplan scenario);
- Peacock Mews – private communal space (approx. 131sqm);
- Ground Floor External Amenity Space (approx. 635sqm); and
- Terrace External Amenity space (Level 04) (approx. 210sqm).

6.6.30 The site measures 0.36ha, or 3.33% of the Site Allocation NT5 area (11.69ha). The proposed provision of 1,661sqm of open space amounts to 4.21% of the overall area called for in the HRWMF but as discussed in more detail under the Social and Community Infrastructure heading below, CIL would be collected and could be used towards the delivery of additional (publicly accessible) open space in Peacock Park.

Building Scale, Form and Massing

6.6.31 The scale form and massing largely reflects that of the extant permission but it incorporates an additional open courtyard to the rear of the high road buildings and greater massing to the western end of the building, with an additional storey between the two corner buildings and additional bulk and massing to accommodate the additional floorspace.

- 6.6.32 London Plan Policy D9 (A) calls on development plans to define what is considered a tall building for specific localities, based on local context (although this should not be less than 6-storeys or 18 metres above ground to the floor level of the uppermost storey).
- 6.6.33 Policy D9 of the London Plan acknowledges that Development Plans should define what is considered a tall building for specific localities. The Local Plan (Strategic Policies 2013-2026) included a borough-wide definition of 'tall building' as being those which are substantially taller than their neighbours, have a significant impact on the skyline, or are of 10-storeys and over (or otherwise larger than the threshold sizes set for referral to the Mayor of London).
- 6.6.34 The London Plan sets a minimum height for tall buildings of more than 6-storeys or 18 metres above ground to the floor level of the uppermost storey. Only the northwest corner of the building would exceed this height – in the form of a setback seventh storey. The majority of its form falls below the minimum height set in the London Plan.
- 6.6.35 Haringey's local policies identify the site as a growth area potentially suitable for tall buildings and indicates that a tall building would be a building of 10-storeys or more. The proposed building would not have a significant impact on the skyline, nor would it be substantially taller than its neighbours given existing, and potential for, tall buildings in the area.
- 6.6.36 Whilst the building would be taller than its immediate neighbours, there are several tall buildings in the area, such as River Apartments to the north, the towers of the Love Lane Estate to the south, and the Tottenham Hotspur stadium development to the east as well as extant permissions to the west of the site.
- 6.6.37 In this context the proposed building would not be substantially taller than its neighbours, particularly given its form which steps up away from the High Street frontage – whereby elements are 2-3 storeys. The proposed height is largely in line with the HRW Masterplan Framework.
- 6.6.38 The stepped form of the proposed building would also have a modest impact on the skyline, it would have a negligible impact in views looking west from the High Street, and in views from the east it would be visible but commensurate with its location in an allocated site.
- 6.6.39 The taller parts of the development also serve to mark the laneways of Brunswick Square and Percival Court for wayfinding purposes. As set out below the design is considered to be high quality. The proposal would not have a significant environmental impact on the surrounding area.

6.6.40 Strategic Policy SP11 of the Local Plan requires all new development to enhance and enrich Haringey's built environment and create places and buildings of high quality. The HRWMF massing principles seek to locate tall buildings towards the railway line, to create an edge to the development and build on the character established by the 22-storey River Apartments tower (81.5m AOD) at Cannon Road.

6.6.41 Figure 52 of the HRWMF shows buildings reducing in height from this tower towards the High Road/White Hart Lane to create an appropriate heritage setting for statutory listed and locally listed buildings and Figure 53 sets out indicative proposed building heights. The building heights proposed by this application are set out in the table below, alongside the approved heights in the extant consents and the indicative HRWMF heights.

Table 04: Proposed building heights

Proposed	HRWMF Indicative heights
• 3-7-storeys on to Brunswick Square • 4-6-storeys on to Percival Court • Central 6-storey section facing Peacock Industrial Estate.	• 3-5-storeys

6.6.42 The proposed building heights would generally accord with guidance in the HRWMF, although the western end of the proposed Printworks building would exceed 5-storeys.

6.6.43 The proposed height of the proposal conforms to what is envisaged in the masterplans with lower rise to match the retained existing High Road fronting buildings closest to them, then rising gradually to four, five and six storeys around the western courtyard and seven at the north-western corner, an acceptable height within the meaning of the "mansion block" typology. These heights are likely to fit in well with the rest of the masterplan, in whichever detailed form.

6.6.44 Officers do not consider that the proposed scheme, which is a maximum of 7-storeys, constitutes a 'tall building' for the purposes of the HRWMF assessment and Haringey Local Plan Policy. As such, it does not require assessment under London Plan policy D9 as its form in this location and context would not constitute a tall building with only the northwestern corner marginally breaching the 18 metres above ground to the floor level of the uppermost storey minimum.

6.6.45 In terms of bulk and massing, the proposals step in on all sides from the red-line boundary, although this is driven as much by necessity - to provide access, servicing, and fire compliance, it avoids overcrowding the surroundings.

- 6.6.46 The scale and bulk proposed to the intended street frontages is appropriate, with the intended street to the west (where the proposed bulk and height of development is greatest) being the wider and more important, conventional street. The scale and bulk of the Brunswick Square frontage noticeably reduces in both height and plan depth, commensurate with it being a narrow, tighter alleyway - even in its proposed, wider state.
- 6.6.47 To the south, the boundary steps away from Percival Court. The proposal creates a narrow servicing and fire escape passageway along the southern boundary. The northern side of the eastern podium is only enclosed by a two-storey maisonette with a gap to the rear of the existing 827, giving the separation between the existing High Road frontages of heritage significance and the main new build a spacious quality.
- 6.6.48 At both western corners, the proposals rise up and mark the corners with an extra storey (six at the southern end, seven at the northern), marking what will become, in the masterplan, significant crossroad street corners and in the northern case also the southern end of the proposed new public park (Peacock Park).
- 6.6.49 In urban design terms this is an appropriate response to their intended location. They also mark the culmination of the very gradual stepping up and significant separation of new built form from the historic existing High Road frontage.

Townscape and Visual Effects

- 6.6.50 London Plan Policies D9 and HC4 make clear that development should not harm Strategic Views, with further detail provided in the Mayor's London View Management Framework (LVMF) SPG. At the local level, Policy DM5 designates local views and the criteria for development impacting local view corridors.
- 6.6.51 As mentioned above, the proposed height of the proposal conforms to what is envisaged in the masterplans with lower rise buildings to match the retained existing High Road fronting buildings closest to them, then rising gradually to four, five and six storeys around the western courtyard and seven at the north-western corner. These proposed heights would not harm strategic views and would preserve local views.

Inclusive Design

- 6.6.52 London Plan Policies GG1, D5 and D8 call for the highest standards of accessible and inclusive design, people focused spaces, barrier-free environment without undue effort, separation, or special treatment.
- 6.6.53 The applicant's Design and Access Statements (DAS) explains how the proposed scheme has been designed to meet inclusive design principles and

good practice. All external routes, footway widths, gradients and surfacing would respect the access needs of different people.

6.6.54 The proposed external amenity/courtyard spaces are designed to be safe (as discussed above) and provide interest at different times of the year – with no separation based on affordability. The plans indicate that building access, internal corridors and vertical access are likely to meet Building Regulations.

6.6.55 As discussed under Transportation and Parking below, car parking provision would be focused on the needs of wheelchair users and others that may have a particular need to access a car.

6.6.56 The proposed cycle parking also includes spaces for ‘adaptive’ and large bikes. The proposed surfacing improvements to Brunswick Square and Percival Court are welcomed (which are recommended to be secured by s106 planning obligation/s278 Agreement).

6.6.57 Overall, officers are satisfied that the proposed scheme would be accessible and inclusive. The requirements in relation to wheelchair accessible accommodation is discussed under Accommodation Quality below.

Secured by Design

6.6.58 London Plan Policies D1-D3 and D8 stress the importance of designing out crime by optimising the permeability of sites, maximising the provision of active frontages, and minimising inactive frontages.

6.6.59 As discussed above, the proposed layout incorporates a good front to back relationship and includes active ground floor frontages in the form of flexible commercial units, duplex clusters with front doors on the streets and communal entrances.

6.6.60 This should all help ensure a safe and secure development and an active public realm – particularly along Brunswick Square. The detailed design of the public realm, including proposed landscaping and lighting, are also considered acceptable.

6.6.61 The applicant’s DAS sets out a number of detailed access features and gates that are intended to be incorporated into the scheme. The Designing Out Crime Officer (DOCO) raises no objection in principle, subject to the imposition of appropriate conditions.

6.6.62 If planning permission were to be granted, it would be possible to use a planning condition to require Secured by Design accreditation and ensure the DOCO’s continued involvement in detailed design issues.

6.7 Accommodation Quality

- 6.7.1 As noted in section 6.4 DM DPD policy DM15 requires the accommodation to be of a high-quality design including consideration for unit size, daylight & sunlight, and provision made for students with disabilities. London Plan Policy H15 part 5 also sets out that PBSA accommodation must provide adequate functional living space and layout.
- 6.7.2 The plans indicate that the bedroom sizes proposed are more generous than typical room sizes for recent student accommodation developments in London and are considered to meet or exceed the needs of educational institutions. Cluster bedrooms are all a minimum of 12.5sqm, studio bedrooms are split into two categories with standard and premium accommodation. The standard rooms are a minimum of 18sqm and the premium rooms a minimum of 24sqm.
- 6.7.3 The assessment under section 6.4 identified that the proposed accommodation would provide adequate functional living space and layout as it would include two generous external communal courtyards at ground floor level and a roof garden at 4th floor level. Generous internal shared amenity space would be provided at ground floor level which could provide a large entrance/reception space, a laundry, a screening room, a breakout/games room, a study space, a café, and a gym.
- 6.7.4 Every room would be ensuite with studio rooms having kitchenettes and premium studios also have a seating area. Shared living kitchen dining areas (LKDs) would be provided for each cluster of bedrooms. A cluster would contain a maximum of 12 bedrooms with the associated LKD sized, proportionately, so that sufficient kitchen space is provided for all rooms of accommodation. Overall, the quality of private and communal accommodation is high for student housing.

Accessible Accommodation

- 6.7.5 The London Plan does not specify a percentage of rooms that must be accessible and/or wheelchair adaptable, however, DPD policy DM15 requires provision to be made for units that meet the needs of students with disabilities.
- 6.4.1 A Practice Note on Wheelchair Accessible and Adaptable Student Accommodation was issued by the GLA in November 2022. The note indicates that the Building Regulations make clear that student accommodation is to be treated as hotel/motel accommodation.
- 6.4.2 As such, for the purposes of ensuring provision of accessible student accommodation, in addition to London Plan policy D5, the relevant part of Policy E10 Part H also applies to development proposals for new non-self-

contained student accommodation. The relevant part of E10 Part H states that development proposals for serviced accommodation should provide either:

1. 10 per cent of new bedrooms to be wheelchair-accessible in accordance with Figure 52 incorporating either Figure 30 or 33 of British Standard BS8300- 2:2018 Design of an accessible and inclusive built environment. Buildings - Code of practice; or
2. 15 per cent of new bedrooms to be accessible rooms in accordance with the requirements of 19.2.1.2 of British Standard BS8300-2:2018 Design of an accessible and inclusive built environment. Buildings - Code of practice'

6.7.6 The scheme has been designed to British Standard BS8300-2:2018, Design of an accessible and inclusive built environment, Buildings Code of practice, and therefore 10% (29 in total) of the units would be wheelchair-accessible. The proposed accessible bedrooms are accommodated within the studio bedroom provision. Just under 35% of these 29 accessible studios (10 bedrooms) would be affordable student accommodation.

Unit Aspect, outlook, and privacy

6.7.7 Almost all units are inevitably single aspect, except for some corner units. As the layout currently follows the street pattern, some units will be single aspect and north facing. Where rooms wrap around the corners of the proposed PBSA building, these windows generally facilitate communal LKD spaces or premium rooms. Dual aspect amenity spaces have been maximised for cluster units.

6.7.8 The outlook for the rooms would be acceptable and all rooms would have sufficient levels of privacy.

Daylight/Sunlight/overshadowing – Future Occupiers

6.7.9 The applicant's Internal Daylight and Sunlight Report (August 2023) reports on an assessment of in total, 328 rooms: 309 in the PBSA building (222 bedrooms, 28 shared LKDs, 54 studios, and 5 communal spaces), and 19 in the High Road buildings (2 communal spaces, 4 2/3- bed cluster flats (9 bedrooms and 4 LKDs), and 2 1-bed studios (2 kitchens and 2 bed-living rooms). Sunlight was also assessed to all habitable rooms irrespective of orientation and to the three proposed outdoor amenity spaces within the development.

6.7.10 The nature of student accommodation requires some departure from the amenity standards that apply to normal residential accommodation, because PBSA would typically be occupied for less than a year, its population would change from year to year, and the main function of the rooms is for sleeping, with much of the students' daytime activities taking place elsewhere (either within other parts of the building or at the institution they attend).

- 6.7.11 Of the 328 rooms assessed, 246 (75%) would meet the target daylight illuminances adopted in the assessment (100 lux for bedrooms, 150 lux for shared LKDs, studios, bed-living rooms and indoor amenity spaces, and 200 lux for a KD and a kitchen).
- 6.7.12 Paragraph C17 of the 2022 BRE guidance on student accommodation (BR 209) suggests that the higher level of 150 lux (usually for living rooms) should be used for bed sitting rooms in student accommodation if students would often spend time in their rooms during the day.
- 6.7.13 The applicant has used 100 lux which is considered to be acceptable given the other spaces available for studying in the building and on campus. The building has study space available on the ground floor and in the LKDs. Moreover, in the bedrooms, a desk would typically be positioned close to the window where the median illuminance would generally be at least 200 lux.
- 6.7.14 The analysis states that the requirement for the design to balance daylight with passive solar gain and overheating considerations precludes the provision of more or larger windows or the use of glazing with higher visible light transmittance.
- 6.7.15 So, whilst 25% of the rooms would not meet the target daylight illuminances, this is still considered to be acceptable given the stringent nature of the latest guidance, the site constraints, and the proposed type of accommodation and how it is used.
- 6.7.16 To provide further context, daylight provision was also assessed using the average daylight factor (ADF) methodology under the superseded 2011 edition of the BRE guide. 302 rooms (92%) would have satisfied the corresponding ADF targets. The lower level of adherence to the latest 2022 guidelines arises because the new criteria are more difficult to achieve, partly because more conservative internal surface reflectances must now be used in the calculations.
- 6.7.17 In terms of sunlight, 64 out of 88 (73%) of cluster flats and studios would satisfy the guideline for normal residential development of at least 1.5 hours of sunlight on 21 March, and five out of seven of the indoor communal amenity spaces would exceed or be close to that target.
- 6.7.18 The two courtyard areas would be below the guideline, with 35% and 1% of their respective areas receiving at least two hours of sunlight on 21 March (and therefore for at least half the year). In midsummer (21 June), 95% and 76% of their respective areas could receive at least two hours of sunlight.
- 6.7.19 The fourth-floor amenity terrace would be very well sunlit, with 94% of its area receiving at least two hours of sunlight on 21 March and 100% in midsummer.

Whilst the courtyard spaces would be more shaded, the students would have access to the well sunlit terrace at 4th floor level.

Noise and vibration – Future Occupiers

- 6.7.20 London Plan Policy D13 introduces the concept of ‘Agent of Change’, which places the responsibility for mitigating impacts from existing noise and other nuisance-generating activities or uses on proposed new noise-sensitive development.
- 6.7.21 Policy D14 sets out requirements to reduce, manage and mitigate noise. London Plan Policy D14 also seeks to separate noise generating uses from housing or ensure that there is appropriate mitigation where this is not possible and minimise noise from development and to improve health and quality of life. Similar objectives are included in Local Plan Policy DM23.
- 6.7.22 Noise from the Peacock Industrial Estate and crowd/concert noise from the Tottenham Hotspur Stadium is not expected to contribute to the overall noise climate of the proposed accommodation as this would be less than the ambient noise level associated with trains (further to the west) and road traffic on the High Road.
- 6.7.23 The proposed accommodation on the western edge of the site would be approx. 2-3m from the boundary and car parking area and be between approx. 18 to 21m from the industrial/warehousing units themselves. A 2m high brick wall would be located along the boundary and the proposed accommodation would be student rooms with access to other parts of the building that has work and amenity spaces.
- 6.7.24 As the masterplan is developed, the need for the wall will fall away. The wall is a temporary solution which would enable the proposal to fit in with the existing arrangement and enable the existing uses to coexist with those proposed in a way that safeguards the needs of the Peacock Estate and those of the future occupants of the proposal.
- 6.7.25 The applicant’s Noise Impact Assessment sets out sound insulation requirements to ensure that the internal noise environment of the accommodation meets the relevant standards and recommends that mechanical ventilation be installed for these blocks, so that windows can be kept closed.
- 6.7.26 The Assessment also considers overheating and identifies the need for the inclusion of an acoustically attenuated façade louvre that could be opened or closed by occupiers on facades that are considered ‘medium’ or ‘high’ risk of overheating, and these have been incorporated into the proposed detailed

design. It is recommended that further details of the proposed glazing, mechanical ventilation and louvres are secured by way of a planning condition.

- 6.7.27 It is recommended that conditions are attached to a planning permission to control mechanical plant noise by way of a standard planning condition (calibrated to reflect the site-specific noise environment).
- 6.7.28 It would also be possible to use planning conditions to secure adequate mitigation to prevent undue noise transmission between the proposed ground floor commercial units and the proposed accommodation above and to limit the hours of use of any café/restaurant to 07.00 to 23.00 (Monday to Saturday) and 08.00 to 23.00 (Sundays and Public Holidays).

Residential Quality – Summary

- 6.7.29 The number of proposed wheelchair accessible bedspaces and quality of the units of accommodation would be acceptable. The proposed accommodation and associated communal open space would generally be high quality and officers are satisfied that future residents would enjoy high-quality design including good unit sizes, adequate functional living space and layout.
- 6.7.30 Whilst not all rooms would meet the target daylight illuminances, the majority would, and where daylight is restricted a study desk would typically be positioned close to the window where the median illuminance would generally be at least 200 lux. The design has had to balance daylight with passive solar gain and overheating considerations which has limited the size and quantity of glazed areas.
- 6.7.31 In terms of sunlight, the majority of cluster flats and studios as well as communal amenity spaces would satisfy the guidelines. Whilst the courtyard spaces would be more shaded, the students would have access to the well sunlit terrace at 4th floor level. This would be an acceptable level of amenity in terms of outlook and privacy, daylight and sunlight, noise and vibration and overheating for the proposed student accommodation.
- 6.7.32 The proposed layout and disposition of uses takes account of the existing Peacock Industrial Estate and subject to securing appropriate glazing/ventilation arrangements, officers are satisfied that the proposed scheme would be compatible and comply with the Agent of Change principle.

6.8 Social and Community Infrastructure

Policy Background

- 6.8.1 The NPPF (Para. 57) makes clear that planning obligations must only be sought where they meet the tests of necessity, direct relatability and are fairly and

reasonably related in scale and kind to the development. This is reflected in Community Infrastructure Levy (CIL) Regulation 122.

- 6.8.2 London Plan Policy S1 states adequate provision for social infrastructure is important in areas of major new development and regeneration. This policy is supported by a number of London Plan infrastructure related policies concerning health, education, and open space. London Plan Policy DF1 sets out an overview of delivering the Plan and the use of planning obligations.
- 6.8.3 Strategic Policy SP16 sets out Haringey's approach to ensuring a wide range of services and facilities to meet community needs are provided in the borough. Strategic Policy SP17 is clear that the infrastructure needed to make the development work and support local communities is vital, particularly in the parts of the borough that will experience the most growth.
- 6.8.4 This approach is reflected in the TAAP in Policies AAP1 and AAP11. DPD Policy DM48 notes that planning obligations are subject to viability and sets a list of areas where the Council may seek contributions. The Planning Obligations SPD provides further detail on the local approach to obligations and their relationship to CIL.
- 6.8.5 The Council expects developers to contribute to the reasonable costs of new infrastructure made necessary by their development proposals through CIL and use of planning obligations addressing relevant adverse impacts. The Council's Annual Infrastructure Funding Statement (December 2022) sets out what Strategic CIL can be used for (infrastructure list) and how it will be allocated (spending criteria).

Site Allocation NT5 Infrastructure Requirements and the HRWMF

- 6.8.6 The NT5 Site Allocation envisages large scale redevelopment giving rise to infrastructure obligations above those that may be required on smaller and less complex sites addressed by CIL. The overarching vision for the High Road West area is for a significant increase in the provision of community facilities and envisages that the local community will have the best possible access to services and infrastructure.
- 6.8.7 Key to the TAAP site delivery for NT5 is the creation of new leisure, sports and cultural uses that provide 7 day a week activity. The infrastructure requirements for the wider NT5 site are broadly identified in the NT5 Site Allocation, including:
- A new Learning Centre including library and community centre;
 - Provision of a range of leisure uses that support 7 day a week activity and visitation; and

- Provision of a new and enhanced public open space, including a large new community park and high-quality public square along with a defined hierarchy of interconnected pedestrian routes.

6.8.8 The extant permission secured financial contributions (totalling £192,125) towards these infrastructure requirements but only if permission was issued prior to the increased CIL rate taking effect on 1st September 2022. The permission was issued on 31 August 2022.

6.8.9 The overall contribution of £192,125 on top of CIL is not necessary in this instance as the total CIL charge has since increased from £20.84p/sqm for conventional residential to £97.55 p/sqm for student accommodation. Therefore, the updated CIL charge is much greater than the total of the previous CIL charge and the infrastructure contribution combined.

6.8.10 Health. The NHS London Healthy Urban Development Unit notes that a planned health centre as part of the THFC stadium development is not guaranteed. In advance of this opening, further capacity is needed and following the pandemic there has been significant pressure on hospital and acute services, including mental health, and therefore mitigation from the development is necessary.

6.8.11 Using the HUDU Planning Contributions Model, the Unit has calculated the requested contribution of £151,530.00 to be paid on commencement and indexed linked to building costs. The overall capital cost was calculated to be £303,060.00. However, discussions with the NHS Trusts and the ICB indicate that expansion of existing sites should be possible and therefore the capital cost of mitigation was reduced by 50% to £151,530.00.

6.8.12 Under the extant scheme £35,845 was requested. This figure was not sought as Haringey's Planning Obligations SPD and Annual Infrastructure Funding Statement state that health contributions should be dealt with through Strategic CIL rather than s106 planning obligations. Given that this was granted last year at the end of summer 2022 it is considered appropriate to maintain this position.

6.8.13 Therefore, the need for additional primary health care, acute care, and mental health provision should be addressed by considering the use of Strategic CIL to support new facilities and/or expansions of existing sites to cater for the needs arising from the wider High Road West site rather than through s106 planning obligations.

6.8.14 The CIL rate which currently applies to student accommodation significantly exceeds the previous CIL rate which applied to conventional residential before the CIL charges were significantly increased in the east of the borough. The previous scheme was not required to pay s106 costs towards healthcare and a considerably greater increase in CIL payments from the scheme would be generated following adoption of the revised charging schedule. Therefore, the

higher CIL charge can be directed towards health and wellbeing facilities, amongst others, in line with the Council's infrastructure needs.

6.9 Heritage Conservation

- 6.9.1 Paragraph 196 of the revised NPPF sets out that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.
- 6.9.2 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.
- 6.9.3 Policy SP12 of the Local Plan seeks to maintain the status and character of the borough's conservation areas. Policy DM6 of the DM DPD continues this approach and requires proposals affecting conservation areas and statutory listed buildings, to preserve or enhance their historic qualities, recognise and respect their character and appearance and protect their special interest.
- 6.9.4 Policy AAP5 of the Tottenham Area Action Plan speaks to an approach to Heritage Conservation that delivers "well managed change", balancing continuity and the preservation of local distinctiveness and character, with the need for historic environments to be active living spaces, which can respond to the needs of local communities.
- 6.9.5 Policy NT5 requires consistency with the TAAP's approach to the management of heritage assets. The High Road West Master Plan Framework's approach to managing change and transition in the historic environment seeks to retain a traditional scale of development as the built form moves from the High Road to the west of the Master Plan area.
- 6.9.6 The HRWMF promotes the adaptable reuse of heritage assets with appropriate future uses identifying how various individual buildings will be used, what works they will require including restoration and refurbishment works to adapt to the proposed use.

Legal Context

- 6.9.7 The Legal Position on the impact of heritage assets is as follows. Section 72(1) of the Listed Buildings and Conservation Areas Act 1990 provides: "In the exercise, with respect to any buildings or other land in a conservation area, of any functions under or by virtue of any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or

enhancing the character or appearance of that area.” Among the provisions referred to in subsection (2) are “the planning Acts”.

- 6.9.8 Section 66 of the Act contains a general duty as respects listed buildings in exercise of planning functions. Section 66 (1) provides: “In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.”
- 6.9.9 The Barnwell Manor Wind Farm Energy Limited v East Northamptonshire District Council case tells us that “Parliament in enacting section 66(1) intended that the desirability of preserving listed buildings should not simply be given careful consideration by the decision-maker for the purpose of deciding whether there would be some harm but should be given “considerable importance and weight” when the decision-maker carries out the balancing exercise.”
- 6.9.10 The judgment in the case of the Queen (on the application of The Forge Field Society) v Sevenoaks District Council says that the duties in Sections 66 and 72 of the Listed Buildings Act do not allow a Local Planning Authority to treat the desirability of preserving listed buildings and the character and appearance of conservation areas as mere material considerations to which it can simply attach such weight as it sees fit.
- 6.9.11 If there was any doubt about this before the decision in Barnwell, it has now been firmly dispelled. When an authority finds that a proposed development would harm the setting of a listed building or the character or appearance of a conservation area or a Historic Park, it must give that harm considerable importance and weight.
- 6.9.12 The authority’s assessment of likely harm to the setting of a listed building or to a conservation area remains a matter for its own planning judgment but subject to giving such harm the appropriate level of weight and consideration. As the Court of Appeal emphasized in Barnwell, a finding of harm to the setting of a listed building or to a conservation area gives rise to a strong presumption against planning permission being granted.
- 6.9.13 The presumption is a statutory one, but it is not irrebuttable. It can be outweighed by material considerations powerful enough to do so. An authority can only properly strike the balance between harm to a heritage asset on the one hand and planning benefits on the other if it is conscious of the strong statutory presumption in favour of preservation and if it demonstrably applies that presumption to the proposal it is considering.

- 6.9.14 In short, there is a requirement that the impact of the proposal on the heritage assets be very carefully considered, that is to say that any harm or benefit needs to be assessed individually in order to assess and come to a conclusion on the overall heritage position. If the overall heritage assessment concludes that the proposal is harmful then that should be given "considerable importance and weight" in the final balancing exercise having regard to other material considerations which would need to carry greater weight in order to prevail.

Existing Buildings and Significance

- 6.9.15 The two 3-storey Georgian townhouses at Nos. 819-821 High Road (Listed Grade II) date from circa 1725. In the 19th century they provided the Head Offices of the Tottenham and Edmonton Weekly Herald newspapers (with a former printworks behind). They now accommodate the Le Royale Banqueting Suite on the ground floor, with homes above, and with large 3-storey extensions and a large industrial-shed like building at the rear. The interior of the buildings has been extensively altered but include some original features.
- 6.9.16 The 19th Century 2-storey buildings at Nos. 823, 825 and 827 are locally listed buildings and are occupied by various shops and commercial uses on the ground floor with homes above. The 2-storey locally listed building at No.829 is a later building dating from circa 1902. Nos. 827 and 829 have been extended at the rear and buildings have been extensively altered inside and out.
- 6.9.17 The above frontage buildings are within the North Tottenham Conservation Area, which is in a fragile condition, and it is currently designated a "Conservation Area at Risk" by Historic England. The Listed and locally listed buildings on the site and the adjoining narrow Brunswick Square make a positive contribution to the character and appearance of the Area. The unattractive 20th century 3-storey buildings immediately to the north of Brunswick Square (Nos. 831-833 High Road) are identified in the Appraisal and Management Plan as being 'Negative Contributors.'

Proposed works and Assessment

- 6.9.18 Refurbishment and alteration to Nos. 819-821 (Listed Buildings). The proposed comprehensive refurbishment and repair of these buildings includes the removal of the existing 3-storey unsympathetic rear extensions and replacement with a single-storey extension, reinstatement of a former hipped roof and chimneystack, reinstatement of original layout at upper level, removal of satellite dishes and other clutter from the front facade, repair of brickwork and joinery, and the replacement of poor quality modern internal and external doors, windows and shopfront with more sympathetically designed features.
- 6.9.19 The ground floor of no. 819 would be a commercial unit and proposed ground floor and the single-storey extension to both properties would form part of the

proposed ancillary spaces to the student accommodation, the extended upper floors would remain as housing. Officers welcome the proposed works and uses. It is recommended that a condition prevents demolition works until a contract for replacement development has been entered into.

- 6.9.20 Demolition of No. 829 (Locally listed building). The existing Brunswick Square is a narrow public highway. Whilst it functions as a 2-way street, it is only 3.4m wide at the High Road frontage and only approx. 3m wide at its narrowest point and there are no passing points, making it unsuitable as a vehicular access for a fire tender and refuse vehicle to serve the site in the interim condition – in advance of development of the wider masterplan, which would provide vehicular access to the site from new streets to the west. The proposal is to demolish this building to enable a wider carriageway of at least 3.7m, a servicing bay, a separate footway and public realm areas.
- 6.9.21 No. 829 High Road, in itself, has little inherent conservation value or significance. Its value derives mainly from its contribution to the group of heritage buildings that it is part of and in defining the narrow Brunswick Square. The loss of the ‘tightness’ of grain at the High Road entrance and the greater exposure of the unattractive building at Nos. 831-833 would be offset by the proposed planting of a specimen tree, an arch over the proposed footway, signpost and high-quality surface treatment.
- 6.9.22 The proposed buildings along Brunswick Square would replace the large hardstanding area continue to reinforce the tight grain townscape – making Brunswick Square more attractive, safer, and more accessible. Overall, officers consider that the loss of this building would be acceptable. It is recommended that a condition prevents its demolition until a contract for the construction of the proposed Printworks building and landscaping works has been entered into. It is also recommended that a photographic survey of the building be submitted before its demolition.
- 6.9.23 Refurbishment and alteration to Nos. 823 to 827 (Locally listed buildings). The proposed comprehensive refurbishment and repair of these buildings includes the removal of the existing 3-storey unsympathetic rear extension to No. 823, removal of clutter from the front facades, repair of brickwork and joinery, and the replacement of poor-quality shopfronts, modern internal and external doors and windows to a more sympathetic design. The ground floor of nos. 823-825 would form the proposed reception for the PBSA with no. 827 providing the Class E commercial space. The upper floors would remain as housing albeit student accommodation.. Officers welcome the proposed works and uses.
- 6.9.24 North Tottenham Conservation Area. Whilst the proposed removal of No. 829 High Road and widening of Brunswick Square would have a negative effect on the character and appearance of the Conservation Area, this has been mitigated by the proposed landscape features at the junction with the High Road and

good-quality frontage buildings and public realm further back from the High Road. The comprehensive refurbishment and alterations to the Listed Buildings and retained locally listed buildings would be beneficial. Overall, officers consider that the proposals would have a positive effect on the appearance and character of the Conservation Area.

The planning balance

6.9.25 Taking full account of the Council's statutory duty under sections 16 and 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990, paras 202 and 203 of the NPPF this harm has been given significant weight and requires a balancing exercise against public benefit.

6.9.26 The proposed development would result in both heritage harm and benefits, which affect the Listed buildings at Nos. 819-821, the North Tottenham Conservation Area, and the locally listed buildings at Nos. 823-829. This results in a complex interaction of harm and benefits.

6.9.27 The submission sets out what the applicant considers to be the public benefits of the proposed scheme. Taking account of this and their own assessment, officers summarise the public benefits as follows:

- Securing the long-term future of the Grade II listed 819-821 High Road and the locally listed buildings at 823-827 High Road;
- Integrating the statutorily and locally listed buildings at 819-827 High Road within the development, better revealing their significance in the process and enhancing their overall appearance and setting within the Conservation Area;
- Responding to the needs for student accommodation and contributing to the delivery of housing at a ratio of 2.5:1 (114 homes or net gain of 101 homes);
- Creating a new, high-quality entranceway to Brunswick Square that opens views into a well-designed and active streetscape. Coupled with the creation of a high-quality, accessible, and secure public realm along Brunswick Square, this represents a significant improvement to the existing alleyway which is unattractive and unsafe;
- Achieving a better townscape legibility and integration of the site within the wider site allocation;
- Making a meaningful contribution to the wider regeneration objectives for North Tottenham and Site Allocation NT5;
- Attracting new investment and visitors to North Tottenham, with commercial uses bringing new attractions and spending to the local area. Together with annual household spending from the occupants of the accommodation each year in the local area;
- The creation of new employment opportunities during the construction and operational phases, with opportunities for local recruitment and skills development;

- Acting as a catalyst for investment and further regeneration of Site Allocation NT5 and the wider area, redressing inequality and halting further decline in Tottenham without prejudicing other development in the vicinity;
- Complementing the ongoing regeneration of Tottenham that has taken place to the east, notably within the NDP and Northumberland Terrace.

6.9.28 Having carefully considered issues, officers consider that the public benefits of the proposals, as summarised above, outweigh the less than substantial harm that would be caused by the loss of the non-designated No. 829 High Road.

Heritage Conclusion

6.9.29 Historic England makes no comment on the proposals but advises that the LPA should seek the views of its specialist conservation advisers.

6.9.30 Officers are bound to consider the strong presumption against granting permission for development that causes harm to the setting of a listed building or to a conservation area in line with the legal and policy context set out above.

6.9.31 The proposed scheme would retain and enhance the two Listed Buildings and three locally listed buildings within the site and improve their setting and would, overall, have a positive effect on the character and appearance of the Conservation Area. The demolition of the locally listed building at No. 829 would result in the total loss of a non-designated heritage asset of some, though limited, heritage significance. This limited loss of significance has to be weighed proportionally in the planning balance, in accordance with paragraphs 202 and 203 of the NPPF. Officers consider that the resultant harm falls in the less than substantial category.

6.9.32 As such, paragraph 202 of the NPPF is engaged, requiring the public benefits to be weighed against the heritage harm. The resultant harm has been given significant weight, but, in accordance with guidance in the NPPF paras (202 and 203) is considered to be outweighed by substantial public benefits referred to above.

6.10 Impact on Amenity of Adjoining Occupiers

6.10.1 London Plan Policy D6 notes that development proposals should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context, whilst avoiding overheating, minimising overshadowing and maximising the usability of outside amenity space.

6.10.2 The Mayor's Housing SPG (2016) reinforces the need for privacy but cautions against adhering rigidly to minimum distance requirements and also calls for the BRE guidance on daylighting and sunlighting to be applied flexibly and sensitively to proposed higher density development, especially in town centres –

taking account of local circumstances, the need to optimise housing capacity and the scope for the character and form of an area to change over time.

Daylight/Sunlight, overshadowing - Methodology

- 6.10.3 The impacts of daylight provision to adjoining properties arising from proposed development is considered in the planning process using advisory Building Research Establishment (BRE) criteria. A key measure of the impacts is the Vertical Sky Component (VSC) test. In conjunction with the VSC tests, the BRE guidelines and British Standards indicate that the distribution of daylight should be assessed using the No Sky Line (NSL) test. This test separates those areas of a 'working plane' that can receive direct skylight and those that cannot.
- 6.10.4 If following construction of a new development, the no sky line moves so that the area of the existing room, which does receive direct skylight, is reduced to less than 0.8 times its former value, this will be noticeable to the occupants and more of the room will appear poorly lit.
- 6.10.5 The BRE Guidelines recommend that a room with 27% VSC will usually be adequately lit without any special measures, based on a low-density suburban model. This may not be appropriate for higher density, urban London locations.
- 6.10.6 The NPPF advises that substantial weight should be given to the use of 'suitable brownfield land within settlements for homes...' and that LPAs should take 'a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site'. Paragraph 2.3.47 of the Mayor's Housing SPG supports this view as it acknowledges that natural light can be restricted in densely developed parts of the city.
- 6.10.7 The acceptable level of sunlight to adjoining properties is calculated using the Annual Probable Sunlight Hours (APSH) test. In terms of sunlight, the acceptability criteria are greater than 25% for the whole year or more than 5% between 21st September and 21st March.
- 6.10.8 A Sun Hours on Ground (SHOG) assessment considers if existing amenity spaces will receive the levels of sunlight as recommended within the BRE guidelines – which recommend that at least half of a space should receive at least two hours of sunlight on 21 March (Spring Equinox), or that the area that receives two hours of direct sunlight should not be reduced to less than 0.8 times its former value (i.e. there should be no more than a 20% reduction). There are no relevant amenity spaces to be assessed for sun on ground.

Daylighting and Sunlight Assessment

6.10.9 The applicant's Daylight Sunlight Report for the extant scheme made an assessment of likely impact on the following 40 residential properties:

- 838 to 810 (evens) High Road (east side, 8 properties);
- 843 to 831 (odds) High Road (west side, 5 properties);
- 817 to 791 (odds) High Road (west side, 10 properties);
- 1 to 7 (odds) White Hart Lane (south side, 3 properties);
- 9-39 White Hart Lane (south side, 1 property); and
- 2 to 30 (evens) White Hart Lane (north side, 13 properties).

6.10.10 The July 2021 report identified just three neighbouring properties that would experience impacts outside the BRE guidelines:

- 831-833 High Road;
- 813-817 High Road; and
- 811a High Road.

As the massing of the proposed development is very similar to that of the 2022 permission/consent, the assessment this time was limited to the previously mentioned three neighbouring properties. This is considered to be an acceptable approach given the recent grant of planning permission and aforementioned similarities.

6.10.11 BRE daylight and sunlight tests were run in four scenarios as follows:

- Scenario 1: Existing baseline v proposed development.
- Scenario 2: Mirror image baseline v proposed development.
- Scenario 3: Extant consent baseline v proposed development.
- Scenario 4: Future baseline v cumulative proposed development.

6.10.12 Scenario 1 assesses the potential impacts of the proposed development against the existing baseline context. It establishes the daylight and sunlight levels that would be retained in the proposed development condition and the degree to which they change from the existing baseline, assuming no other changes in surrounding massing.

6.10.13 Scenario 2 compares proposed daylight and sunlight levels at 831-833 High Road only with those for an alternative baseline with a mirror-image of the massing on the north side of the narrow lane known as Brunswick Square placed on the site in accordance with the guidance at paragraph F5 of the BRE guide.

6.10.14 Scenario 3 compares proposed daylight and sunlight levels with those for an alternative baseline containing the 2022 consented scheme on the Site in accordance with the following guidance at paragraph F2 of the BRE guide:

F2 Sometimes there may be an extant planning permission for a site but the developer wants to change the design. In assessing the loss of light

to existing windows nearby, a local authority may allow the vertical sky component (VSC) and annual probable sunlight hours (APSH) for the permitted scheme to be used as alternative benchmarks. However, since the permitted scheme only exists on paper, it would be inappropriate for it to be treated in the same way as an existing building, and for the developer to set 0.80 times the values for the permitted scheme as benchmarks.

- 6.10.15 Scenario 4 assesses the potential impacts of the proposed development against a future baseline context containing the following consented cumulative schemes:
- Goods Yard + The Depot 2021 scheme consented at appeal (ref. HGY/2021/1771)
 - 807 High Road consented scheme (ref. HGY/2021/0441)
 - Lendlease consented illustrative scheme (ref. HGY/2021/3175)
- 6.10.16 The results indicate that the neighbouring properties would remain with acceptable levels of daylight and sunlight in the post development condition. The only impacts outside the guidelines would be:
- five rooms serving three flats in 831-833 High Road (three bedrooms and two living/dining rooms);
 - five rooms serving two flats in 813-817 High Road (four bedrooms and one living/kitchen/dining room); and
 - three rooms in 811a High Road (a kitchen, a bedroom and a living/kitchen/dining room).
- 6.10.17 Most of the affected rooms are bedrooms, which have a lower requirement for daylight and are less sensitive. In every case the residual daylight and sunlight levels with the proposed development in place would be reasonable for an urban area.
- 6.10.18 It must also be acknowledged that parts of the site are underdeveloped currently, with single-storey buildings or no massing at all. In such cases a greater impact than the BRE's default numerical guidelines may be unavoidable. The supplementary mirror-image assessment of 831- 833 High Road shows that future daylight levels would be the same or noticeably better than the alternative target values derived from a mirror-image building reflected onto the site.
- 6.10.19 Overall, the difference in the daylight and sunlight effects when compared to the permitted scheme is minimal, and therefore the proposed scheme is considered acceptable in daylight and sunlight terms relating to its impact on neighbouring buildings/occupiers.
- 6.10.20 The proposed development would not cause unacceptable harm to daylight or sunlight to existing surrounding residential properties. The layout of the proposed development is consistent with the Council's local planning policy

on daylight and sunlight, particularly having regard to paragraph 125(c) of the NPPF and paragraphs 1.3.45 and 1.3.46 of the Mayor of London's Housing SPG.

- 6.10.21 Overall, officers consider that, the levels of daylight and sunlight conditions would be acceptable – particularly as other residential amenity factors are also considered acceptable (see Overlooking/Privacy and Noise below).

Overlooking/privacy

- 6.10.22 Outlook from accommodation in the proposed smaller new build block on Brunswick Square towards existing windows in the western façade of Nos. 831-833 High Road would maintain the distances between buildings considered acceptable under the extant permission.

- 6.10.23 Windows in the proposed larger block would be approx. 20m away from the consented (but not yet built) No.807 High Road (Block B) on the south side of Percival Court. This separation distance is considered acceptable.

Noise

- 6.10.24 The mainly residential nature of the proposed scheme means that, subject to using planning conditions to limit hours of use of any café/restaurant in the proposed commercial units and to control noise from mechanical plant, it should not cause undue disturbance to neighbouring residents. The applicant's Site Construction Management Plan also sets out minimum standards and procedures for managing and minimising noise during construction (which it is recommended are secured by planning condition).

Amenity Impacts – Summary

- 6.10.25 Amenity impacts must be considered in the overall planning balance, with any harm weighed against expected benefit. There would be some adverse impacts on amenity, as outlined above. However, officers consider that the level of amenity that would continue to be enjoyed by neighbouring residents is acceptable, given the benefits that the proposed scheme would deliver.

6.11 Transportation and Parking

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

- 6.11.2 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 T5 encourages cycling and sets out cycle parking standards and Policies T6 and T6.1 to T6.5 set out car parking standards.
- 6.11.3 Other key relevant London Plan policies include Policy T2 – which sets out a ‘healthy streets’ approach to new development and requires proposals to demonstrate how it will deliver improvements that support the 10 Healthy Street Indicators and Policy T7 – which makes clear that development should facilitate safe, clean and efficient deliveries and servicing and requires Construction Logistics Plans and Delivery and servicing Plans.
- 6.11.4 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 DM Policies DM31 and DM32.
- 6.11.5 DM Policy (2017) DM32 states that the Council will support proposals for new development with limited or no on-site parking where there are alternative and accessible means of transport available, public transport accessibility is at least 4 as defined in the Public Transport Accessibility Index, a Controlled Parking Zone (CPZ) exists or will be provided prior to the occupation of the development parking is provided for disabled people; and parking is designated for occupiers of developments specified as car capped.
- 6.11.6 A key principle of the HRWMF is to create a legible network of east-west streets that connect into the surrounding area, existing lanes off the High Road pocket parks and other open spaces.

Transport Assessment

- 6.11.7 The majority of the site has a PTAL 4, with the southwestern part having a higher PTAL of 5). The site is also located in the Tottenham North CPZ. The application is supported by a Transport Assessment (TA), which incorporates a draft Delivery and Servicing Management Plan, Framework Travel Plan and Outline Construction Logistics Plan.

Site Access – Interim Condition

- 6.11.8 The application sets out details of proposed access arrangements for both the interim condition and a future master planned context, where land to the west, in the wider NT5 Site Allocation, is developed.
- 6.11.9 In the interim condition, a widened Brunswick Square would be used as a two-way access route for refuse collection, servicing and delivery, and emergency

vehicle access. Delivery and servicing vehicles for both the proposed accommodation and commercial uses would access parallel loading bays along the southern side of Brunswick Square.

- 6.11.10 The bays would be able to accommodate up to two 8m long rigid heavy goods vehicles (HGVs) (7.5tonne) vehicles simultaneously. A new footway adjacent to the southern side of Brunswick Square would provide a traffic free pedestrian route to the Printworks building and beyond.
- 6.11.11 To enable delivery and servicing vehicles (including refuse lorries) to turn around and leave in forward gear, a turning head would be recessed into the northern part of the Printworks building. Waste storage and collection is discussed in detail under Waste & Recycling below.
- 6.11.12 Percival Court would provide access to the proposed car parking space that would be provided at ground level. In the interim state a gated access is proposed between the site and the remainder of Percival Court.
- 6.11.13 Both Brunswick Square and Percival Court would be relatively lightly trafficked and be used by pedestrians, wheelchair users and cyclists. It is recommended that s106 planning obligations require the applicant to improve the surface of Brunswick Square.

Vehicular Site Access – Long-term Masterplan Condition

- 6.11.14 In the future masterplanned context, there would be a north-south aligned street along the eastern edge of what is currently the Peacock Industrial Estate, and the western edge of the site. This route would be the primary vehicular access for the wider High Road West Site Allocation (north of White Hart Lane) and connect with Percival Court and Brunswick Square.
- 6.11.15 In the future masterplanned context, the proposed car parking space would continue to be accessed from Percival Court but via the internal masterplan street network only, with no through access along Percival Court to High Road. In the end state the gated access would be removed to allow pedestrian and cycle access to the wider masterplan. Landscape features such as planters would be used to prevent vehicular through access whilst retaining sufficient width for cycle access.
- 6.11.16 Similarly, following the implementation of a connection between Brunswick Square and a masterplan internal road network, delivery and servicing vehicles would be able to access the loading bays along Brunswick Square via the masterplan access to the south on White Hart Lane. Thus, the implementation of the wider masterplan and internal street network would allow

all vehicular access to and from the site to be via the wider High Road West site to the west, with access from High Road no longer required.

6.11.17 However, the layout of the development is such that some flexibility in the future use of Brunswick Square is allowed for, to cater for the future requirements of the remainder of the masterplan. One-way operation of Brunswick Square, from the High Road to the internal streets of the masterplan, however, is the most likely future operational scenario.

6.11.18 It is noted that the exact arrangements cannot be fully determined until the wider masterplan design evolves.

Future Vehicular Access Points

6.11.19 To enable satisfactory future connections with adjoining land part of the High Road West masterplan area and to help ensure the successful development of the wider Site Allocation NT5, it is recommended that s106 planning obligations require a Future Connectivity and Access Plan to secure the right for pedestrians, cyclists and vehicles (including delivery and servicing) to access and egress the site and Percival Court from and to any future streets internal to the masterplan area, including a new street running along the western boundary of the site (and eastern boundary of the current Peacock Industrial Estate).

6.11.20 This would enable land and buildings fronting Percival Court (including the approved development at No. 807 High Road) (HGY/2021/0441) to be accessed by vehicles from the west instead of via the High Road.

Legal Highway Agreements

6.11.21 The proposed widening and other works to Brunswick Square, including its junction on the High Road would need to be the subject of a legal agreement under Section 278 of the Highways Act 1980. This would secure details of how the proposed new streets tie in with the existing highway and junction. It is recommended that a planning condition requires pre- and post-development highway condition surveys, to ensure that footways are restored after development is complete, and a combined Stage 1/2 Road Safety Audit, to ensure that the detailed vehicular access/junction arrangements are satisfactory.

Pedestrian and cycle movement

6.11.22 Pedestrians and cyclists would be able to access the site from the High Road, Brunswick Square, Percival Court, and any future street to the west that is provided as part of wider masterplan proposals. The proposed widened Brunswick Square would provide a much more attractive, safer, and accessible route, not just for the proposed development, but for existing (and future) businesses and homes that the street serves. It is also recommended that s106

planning obligations require the applicant to resurface Percival Court within the application site and for the length of the application site up to the High Road to match the material and quality for the Brunswick Square resurfacing.

Cycle Parking

- 6.11.23 The proposed scheme makes provision for 215 long-stay and 9 short-stay for the student accommodation and 4 long-stay and 9 short-stay for the commercial properties. This is in accordance with London Plan Policy T5 and is acceptable.
- 6.11.24 The on-site cycle parking for long-stay would be spread over 5 internal locations, with bikes being able to be parked on two-tier racks. These locations can be accessed from inside the courtyard of the development and outside on Brunswick Square and the High Road. Short-stay cycle parking will be provided in the form of Sheffield stands on Brunswick Square and Percival Court.
- 6.11.25 Access routes to cycle stores have been designed to be as direct as practicable, with the number of doors to be passed through minimised, whilst considering Secured by Design advice. Doors that cyclists are required to pass through would be an appropriate width. All short stay spaces in the public realm would be provided as Sheffield stands.
- 6.11.26 However, there is insufficient detail on the location and detailed provision of these spaces to ascertain that this meets guidance in the London Cycling Design Standards (including the aspiration for at least 20% provision as Sheffield stands for standard cycles, and the need for 5% provision as wider spaces for non-standard cycles. There is also the need to ensure provision of locker and changing facilities for the proposed commercial space. It is recommended that these details are reserved by way of a planning condition.

Car Parking

- 6.11.27 The published London Plan 2021 Policy T6 Car parking 10.6.5 states that *‘where no standard is given, the level of parking should be determined on a case-by-case basis taking into account of Policy T6 Car Parking, current and future PTAL and wider measures of public transport, walking and cycling connectivity’*.
- 6.11.28 This policy will be utilised because no guidelines are specifically given to student accommodation within the London Plan 2021. This policy states that car free development should be a starting point for all proposals in places that are or planned in locations which are well connected to public transport, with developments elsewhere designed to provide the minimum necessary parking (‘car-lite’). This is further supported by policy DM32 in the Development Management DPD.

6.11.29 With regards to disabled parking bays the provision of one on-site disabled parking space for students of the development is welcomed. Supplementary information has been provided by the applicant's transport consultants on the method used to work out the disabled parking provision for the site. They have identified that the proposed level of provision is commensurate with other similar schemes in the borough and across London.

6.11.30 Taking into account the above policies and the car free nature of the site, apart from the single provision of a disabled parking bay, the development is in accordance with policy. To further ensure that the development does not produce any local vehicle trips the applicant would be required to enter into a s106 agreement prohibiting students from acquiring a residents parking permit. A condition is recommended which would ensure that the proposed car parking space would support an electric vehicle charging point.

Car Club

6.11.31 To help reduce car ownership and reduce pressure for car parking, it is recommended that s106 planning obligations secure financial contributions from the developers to ensure two years' free membership for all residents and £50.00 credit.

Trip Generation

6.11.32 Trip generation has been submitted as part of the application and included within the Transport Assessment. TRICs survey sites have been used as the basis of the analysis, with all 6 sites being used within London and bedroom numbers ranging from 103 – 1,100.

6.11.33 Trips for all modes of transport have been provided on for the AM and PM peaks only, with these trips being quite low for the number of bedrooms that are being provided for this proposal. It is more likely that most trips would be spread out throughout the day as student accommodation does not tend to have the same AM/PM travel as residential developments.

6.11.34 Additionally, this development is more likely to provide an increase in cycling trips because of the high provision of on-site cycle parking. Overall, the Highway Authority finds the trip generation to be acceptable.

Impact, management, and mitigation

6.11.35 Subject to the recommended Road Safety Audit, to ensure the creation of a safe revised Brunswick Square/High Road junction, together with other transport-related recommended conditions and s106 planning obligations, the proposed development by itself would have no discernible impact on highways or public transport.

- 6.11.36 The cumulative impact assessment highlights that, by taking account of the local committed schemes, the overall effect of the proposed development would not be material. The cumulative impact of the Lendlease application indicates that the additional trips by public transport would be accommodated within the existing capacities, however, alongside the impact upon the local pedestrian, cycle, and highway networks, this was further assessed as part of the Lendlease application (HGY/2021/3175).
- 6.11.37 The submissions Transport Assessment has included an Active Travel Zone (ATZ) assessment which has covered a 20-minute cycle distance from the site. It includes an assessment of the environment and main routes for both pedestrians and cyclists to the site, along with key destinations. These routes have been assessed using Healthy Streets and suggestions on how they can be improved for both.
- 6.11.38 Collision data has been included within the ATZ by the developer for a three-year period to November 2020. The Highway Authority has examined collision data via Transport for London's Road Safety Data Reports that only included pedestrians and cyclists in the mode of transport. It can be seen in that there were a number of collisions near to the junction with Northumberland Park and High Road and Percival Court and High Road.
- 6.11.39 The Highway Authority has suggested that the developer provide funding towards a highway improvement scheme which would address issues surrounding pedestrian and cyclist road safety within the vicinity of the site. However, this was not sought under the previous scheme and the access arrangements have not been materially altered.
- 6.11.40 There is also the potential for the proposals to improve the current arrangement by improving visibility splays and widening Brunswick Square. The current scheme would also remove the underground parking from the previous scheme so would reduce the pressure on Percival Court in the interim scenario. As such, the contribution cannot be justified in this context.
- 6.11.41 TfL have requested a package of local walking, cycling and public realm improvements in light of ATZ assessment findings. The development proposals must be considered in the context of the extant consent. The extant consent (Application Reference: HGY/2021/2283). The TA shows that the net impact of the changes brought forward by the current application would be a reduction in trips by all modes in the AM and PM peak hours.
- 6.11.42 As the consented development was deemed to have no unacceptable impact on the transport network, and the proposals would result in a reduction

in trips on all modes, the proposals would have no unacceptable impact on the transport network.

6.11.43 TfL also asked for the impact on the London Overground should be considered cumulatively. The impact on London Overground, including the context of the wider cumulative development was considered in detail for The Goods Yard and The Depot (Application Reference: HGY/2021/1771).

6.11.44 That assessment included The Printworks and concluded that no unacceptable impacts on the London Overground arose. As the development proposals would result in a reduction in trips compared to the consented development the findings of that assessment remain valid.

6.11.45 As the development proposals do not result in significant changes to the street scape compared to consented development a further healthy streets assessment is not required.

Travel Planning

6.11.46 The applicant's Framework Travel Plan sets out objectives of reducing the number of car trips made by residents, increasing the number of trips by walking and cycling and ensuring that development does not add pressure on the public transport system and sets out a strategy and process for setting and achieving specific targets. It is recommended that s106 planning obligations to secure the implementation and monitoring of approved Student and Commercial Travel Plans.

Delivery and Servicing

6.11.47 All of the proposed servicing and deliveries would take place on two new loading bays which are located on the southern part of Brunswick Square. Refuse collection is anticipated to take place on the loading bays and be done by a private refuse collector, the bays are nearby to the refuse stores.

6.11.48 Vehicle types that are expected to service the commercial units are expected to be a combination of heavy and light good vehicles, with a maximum length of 8m and weight of 7.5t. The student accommodation would have services/deliveries by Light Goods Vehicles (LGV) of 6m length and Medium Goods Vehicles (MGV) of 8m length.

6.11.49 A turning head located towards the northern part of the development, and which leads onto Brunswick Square would be provided for vehicle servicing/delivering to turn around and leave in a forward gear back onto High Road. Some swept path drawings have been provided as a part of the Transport Assessment which displays the loading bays being fully occupied with a vehicle leaving whilst a vehicle is still parked up.

- 6.11.50 However, it is difficult to distinguish between the different type of vehicles that are shown in the drawings. Nothing has been suggested on how the turning head will be managed to prevent vehicles from parking inside of it and blocking access for vehicles visiting the site to fully manoeuvre and leave in a forward gear. The submission of Service and Delivery Plan is required by condition which would also detail how moving in and out would be managed.

Construction Activities

- 6.11.51 The applicant's Outline Construction Logistics Plan (CLP) sets out vehicular routing and access parameters and identifies strategies to reduce potential impacts. It includes a commitment to consult with LBH, TfL and other contractors/developers in the area to minimise disruption as much as possible.

- 6.11.52 It is recommended that a condition secures the approval of a detailed CLP. Transport officers have requested a fee for monitoring the construction logistics, however, this was not sought on the previous permission and it would be unreasonable to request it under this scheme in that context.

Transportation - Summary

- 6.11.53 With the transport-related recommended conditions and s106 planning obligations, the proposed development by itself would have no discernible impact on highways or public transport. The cumulative impact of the proposed development would not be material. Similar conditions and s106 obligations to the extant scheme have been recommended given the similarity of the proposals as they relate to transport and highways.

6.12 Energy, Climate Change and Sustainability

- 6.12.1 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 (Be Seen). It also sets a target for all development to achieve net zero carbon, by reducing CO2 emissions by a minimum of 35% on-site, of which at least 10% should be achieved through energy efficiency measures for residential development (or 15% for commercial development) and calls on boroughs to establish an offset fund (with justifying text referring to a £95/tonne cost of carbon). London Plan Policy SI2 requires developments referable to the Mayor of London to demonstrate actions undertaken to reduce life-cycle emissions.

- 6.12.2 London Plan 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).

- 6.12.3 London Plan Policy SI4 calls for development to minimise overheating through careful design, layout, orientation, materials and incorporation of green infrastructure, designs must reduce overheating in line with the Cooling Hierarchy.
- 6.12.4 London Plan Policy SI5 calls for the use of planning conditions to minimise the use of mains water in line with the Operational Requirement of the Buildings Regulations (residential development) and achieve at least BREEAM 'Excellent' standard for 'Wat 01' water category or equivalent (commercial development).
- 6.12.5 London Plan Policy SI7 requires applications referable to the Mayor of London to submit a Circular Economy Statement demonstrating how it promotes a circular economy within the design and aim to be net zero waste.
- 6.12.6 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. It also requires all non-residential developments to achieve a BREEAM rating 'Very good' (or equivalent), although developments should aim to achieve 'Excellent' where achievable.
- 6.12.7 Haringey 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.
- 6.12.8 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

- 6.12.9 The principal target is to achieve a reduction in regulated CO2 emissions over Part L 2013 Building Regulations. The London Plan requires the 'lean', 'clean', 'green' and 'seen' stages of the Mayor of London's Energy Hierarchy to be followed to achieve a 'Zero Carbon' Standard targeting a minimum onsite reduction of 35%, with 10% domestic and 15% non-domestic carbon reductions to be met by energy efficiency. All surplus regulated CO2 emissions must be offset at a rate of £95 for every ton of CO2 emitted per year over a minimum period of 30 years.
- 6.12.10 'Be Lean.' The applicant has proposed a saving of 5% in carbon emission under both scenarios. This goes against the Energy Hierarchy and requirement to take a fabric first approach in line with London Plan Policy SI2 and Local Plan

Policy SP4. However, it is understood that it is challenging for non-residential developments to reach the minimum 15% requirement against Part L 2021. Therefore, the development is required to maximise improvement in building fabric parameters as much as possible.

- 6.12.11 ‘Be Clean.’ The applicant is intending to connect to the Energetik Heat Network, using heat generated at an Energy Centre located to the northeast of the site on the Edmonton Eco-Park close the North London Waste Authority Energy Recovery Facility (ERF). The ERF will provide low carbon heat when it comes on stream in 2026. Energetik plan to provide a heat network to Fore Street (closer to the site to the north).
- 6.12.12 The Council has committed plans to deliver a North Tottenham District Energy Network (DEN) to connect to the Energetik Heat Network. The submitted site plan shows the incoming DEN pipe work below ground to energy centre.
- 6.12.13 ‘Be Green.’ Photovoltaic (PV) arrays comprising 138 panels is proposed, covering approx. 242sqm of roof space. The proposed PV panels are anticipated to save 20.6 tonnes of carbon dioxide per year (a 16% saving above the Building Regulations 2013) (based on SAP2012 carbon factors).
- 6.12.14 Under the DEN scenario, a total of 1.6 tCO₂ (5%) reduction of emissions are proposed under Be Green measures with the installation of solar PV panels. Under ASHP scenario, a communal air-to-water ASHP systems (min. SCOP of 2.5) and SEER of 4.21 will provide hot water, heating, and cooling to the development. A total of 5.7 tCO₂ (12%) reduction of emissions are proposed under Be Green measures.
- 6.12.15 The revised report proposed an estimate of 169 panels of 385W capacity mounted on a roof area of 486.5 m² covering 291.9m² with total peak output of 65kWp. All new development must achieve a minimum 20% reduction from on-site renewable energy generation to comply with Policy SP4. It is required that the roof space is maximised to install solar PV.
- 6.12.16 ‘Be Seen.’ London Plan Policy SI2 requests all developments to ‘be seen’, to monitor, verify and report on energy performance. The GLA requires all major development proposals to report on their modelled and measured operational energy performance. This will improve transparency on energy usage on sites, reduce the performance gap between modelled and measured energy use, and provide the applicant, building managers and occupants clarity on the performance of the building, equipment, and renewable energy technologies.
- 6.12.17 The applicant should install metering equipment on site, with sub-metering by non-residential unit. A public display of energy usage and generation should also be provided in the main entrance area to raise awareness of residents/businesses.

6.12.18 Energy metering will be provided to meet the requirements of the Building Regulations 2021, CIBSE TM39, Metering Instruments Directive (MID) Class 2 Accuracy and the “Be Seen” strategy for the GLA. Smart energy meters/ energy display devices will be installed which have the ability to be read remotely. This will be secured by condition.

6.12.19 Carbon Offsetting. Despite the adoption of the ‘Lean’, ‘Clean’ and ‘Despite the adoption of the ‘Lean’, ‘Clean’ and ‘Green’ measures outlined above, A carbon shortfall of 27.5 tCO₂/year remains. The remaining carbon emissions will need to be offset at £95/tCO₂ over 30 years. It is recommended that s106 planning obligations secure this sum or any different agreed sum that may be appropriate in the light of additional carbon savings that arise from more detailed design agreed with the LPA, by way of s106 planning obligations.

6.12.20 Energy conclusion. The overall anticipated on-site carbon emission reductions and associated offsetting payments would meet London Plan Policy SI2. The proposed connection to an off-site DEN would also meet London Plan Policy SI4.

6.12.21 The proposed ‘Lean’ savings fall below London Plan Policy SI2 requirements. However, it is understood that it is challenging for non-residential developments to reach the minimum 15% requirement against Part L 2021. Therefore, the development is required to maximise improvement in building fabric parameters as much as possible. This will be secured by way of condition.

6.12.22 Officers are satisfied that the amount of proposed roof top PV arrays have been optimised, given other demands for roof-top space.

Overheating

6.12.23 The revised overheating assessments fails to

- demonstrate meaningful compliance with London Plan’s cooling hierarchy.
- provide concrete and tangible evidence on why active cooling was proposed.
- model extreme design weather files: 2020s DSY2 and DSY3.

6.12.24 The report fails to demonstrate the modelling results for different passive mitigation scenarios in line with the cooling hierarchy. Active cooling is proposed which adds to the urban heat island effect. This is not supported without sufficient justification.

6.12.25 However, it is acknowledged that the building performs well overall and is constrained by the noise environment and the ability to apply passive measures such as solar shading due to design constraints. Moreover, these measures are unlikely to make an impact that would do away with the need for active cooling.

As such, it is considered that a condition requiring more justification through use of the cooling hierarchy would adequately resolve the matter given the likely outcomes.

Environmental sustainability

- 6.12.26 Water consumption. In order to ensure compliance with London Plan Policy SI5, it is recommended to use a planning condition to minimise the use of mains water in line with the Operational Requirement of the Buildings Regulations (residential development) to achieve mains water consumption of 105 litres or less per head per day and achieve BREEAM 'Excellent' standard for 'Wat 01' water category or equivalent (commercial development).
- 6.12.27 Considerate Constructors Scheme. The applicant's Site Construction Management Plan states that the principal contractor would be required to manage sites and achieve formal certification under the Considerate Constructors Scheme. If planning permission were granted, this could be secured by a s106 planning obligation
- 6.12.28 Other environmental sustainability issues. Movement and transport, landscape and ecology, air quality, noise, daylight and sunlight, flood risk and drainage are addressed in detail in other sections of this report.

6.13 Flood Risk, Drainage and Water Infrastructure

- 6.13.1 Development proposals must comply with the NPPF and its associated technical guidance around flood risk management. London Plan Policy SI12 requires development proposals to ensure that flood risk is minimised and mitigated, and that residual risk is addressed.
- 6.13.2 London Plan Policy SI13 and Local Policy SP5 expect development to utilise Sustainable Urban Drainage Systems (SUDS).
- 6.13.3 Policies DM24, 25, and 29 continue the NPPF and London Plan approach to flood risk management and SUDS to ensure that all proposals do not increase the risk of flooding. DM27 seeks to protect and improve the quality of groundwater.
- 6.13.4 London Plan Policy SI5 requires proposals to ensure adequate wastewater infrastructure capacity is available.

Flood Risk

- 6.13.5 The site is entirely in Flood Zone 1 and has a low probability of flooding from tidal and fluvial sources. The nearest watercourse is the Moselle River, which is culverted below White Hart Lane approx. 70m to the south of the site.

- 6.13.6 The submitted Flood Risk Assessment (FRA) considers flooding from pluvial, groundwater and from sewers also to be low. The central part of the site has a Low to Medium risk of surface water flooding. Surface water is proposed to be collected in a dedicated surface water drainage system and conveyed, via gravity to the existing sewer network under the Brunswick Square discharging at a rate of 2.0 l/s which is in line with the calculated greenfield runoff rate of 2.03 This represents a significant reduction in the current peak rate of 47.5l/s and the risk of surface water flooding is reduced to Low. Since the proposed surface water drainage strategy represents an improvement in surface water flood risk, officers agree that this meets the requirements for development within Critical Drainage Areas within Policy DM26.
- 6.13.7 Foul water from the proposed development is proposed to be discharged to the existing Thame Water foul sewers at a peak rate of approx. 13.32/s, which would represent a significant increase from the estimated foul water discharge from the existing site (0.36l/s). Since all surface water is proposed to be discharged to a dedicated surface water sewer and there are no known issues associated with lack of capacity of the existing foul water sewer network, the risk of flooding from the foul sewers is considered to be Low.

Drainage

- 6.13.8 The proposed surface water drainage strategy takes account of likely increased rain fall as a result of climate change, factoring in a 40% increase in peak rainfall intensity. A variety of SuDS features are proposed to be incorporated, in accordance with the London Plan drainage hierarchy.
- 6.13.9 The surface water drainage strategy has been developed in accordance with the drainage hierarchy set out in the London Plan. The surface water strategy has been developed to attenuate surface water in a combination of below ground drainage systems in the form of permeable surfacing with below ground Geocellular storage within the two courtyards at ground floor level, as well as bioretention areas on the pavement onto Brunswick Square.
- 6.13.10 Blue roofs are proposed at roof level to reduce the rate of runoff and pre-treat runoff prior to entry to the below ground drainage system. The implementation of SuDS features will help to attenuate and reduce the surface water discharge rate from the proposed development. The SuDS would reduce rates as much as possible and manage run-off as close to the site as possible in accordance with London Plan SI3 (which aims to achieve greenfield rates).
- 6.13.11 Thames Water has raised no objection to the proposed scheme, subject to requested conditions and informatives. The Lead Local Flood Authority (LLFA) likewise has not objected, subject to maintenance of SuDS features. It is recommended that a SuDS management and maintenance plan be secured by condition.

6.14 Air Quality

- 6.14.1 London Plan Policy SI 1 requires development proposals to not worsen air quality and be at least Air Quality Neutral and calls for large-scale EIA development to consider how local air quality could be improved. The London Plan is supported by the Control of Dust and Emissions during Construction and Demolition SPG.
- 6.14.2 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. Haringey is an Air Quality Management Area (AQMA).
- 6.14.3 The application is supported by a Preliminary Air Quality Assessment. The applicant's Site Construction Management Plan also sets out minimum standards and procedures for managing and minimising dust and air quality impacts.
- 6.14.4 The applicant's assessment considers the exposure of future residents to poor air quality and finds that the site would meet relevant air quality objective levels without the need for further mitigation (over and above the proposed limited on-site car parking, electric vehicle charging points and easy access to cycle storage facilities), meaning the site as a whole is considered acceptable for the proposed use.
- 6.14.5 Given the features referred to above, the impact of the proposed scheme on Air Quality is predicted to be 'not significant'. It is recommended that conditions manage and minimise impacts during demolition and construction, in line with the applicant's Site Construction Management Plan and the measures highlighted by LBH Pollution.

6.15 Trees

- 6.15.1 The NPPF (Para. 131) stresses the importance of trees and makes clear that planning decisions should ensure that new streets are tree-lined. London Plan Policy G7 makes clear that development should seek to retain and protect trees of value and replace these where lost.
- 6.15.2 There are no existing trees on the site or on nearby land. The proposed scheme includes the provision of 24 trees (5 at ground level and a further 19 across the proposed podium courtyards and roof terrace) and would see a significant net increase in trees on the site, including along the proposed streets.

6.16 Urban Greening and Ecology

Urban Greening

- 6.16.1 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.
- 6.16.2 In addition to new trees referred to above, the proposed scheme includes flower rich perennial planting, rain gardens and biodiverse intensive and extensive green roofs green walls and groundcover planting as follows:
- Intensive green roof or vegetation over structure – 668sqm
 - Trees planted – 849sqm
 - Flower-rich perennial planting - 103sqm
 - Green wall – modular system or climbers rooted in soil - 162sqm
 - Groundcover planting – 103sqm
- 6.16.3 The applicant's Design and Access Statement includes a calculation of the UGF for the proposed scheme. This demonstrates that the scheme would have a UGF of 0.41, thus exceeding the relevant London Plan target score.

Ecology

- 6.16.4 London Plan Policy G6 calls for development proposals to manage impacts on biodiversity and to aim to secure net biodiversity gain.
- 6.16.5 Local Plan Policy SP13 states that all development must protect and improve sites of biodiversity and nature conservation. In addition, 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.
- 6.16.6 The applicant's Ecological Appraisal Impact Assessment sets out the findings of an extended Phase 1 habitat survey, which concluded that the site is dominated by hardstanding and buildings, offering limited ecological value. No bats or evidence of bats was identified during the ground level assessment of the site and building, and emergence surveys found no evidence of roosting bats within the buildings and no incidental bat activity on the site.
- 6.16.7 The Report submitted with the extant scheme recommended the integration of bird and bat nest boxes into buildings and within proposed trees in communal amenity spaces and concluded that these, together with the proposed tree

planting and green roofs outlined above, would have a beneficial effect on local biodiversity (and result in a Biodiversity Net Gain). It is recommended that planning conditions require provision of bird and bat boxes in trees and buildings to encourage biodiversity.

Habitats Regulation

- 6.16.8 Given the proximity of the application site to two designated European sites of nature conservation, it is necessary for Haringey as the competent authority to consider whether there are any likely significant effects on relevant sites pursuant to Section 63(1) of the Conservation of Habitats and Species Regulations 2017 (“the Habitats Regulations”).
- 6.16.9 The application site is approx. 1.6km west of the Lea Valley Special Protection Area (SPA) at its closest point. The Lea Valley area qualifies as a SPA under Article 4.1 of the Birds Directive on account of supporting nationally important numbers of species. This area is also a Ramsar site. The Lea Valley SPA/Ramsar comprises four underpinning Sites of Special Scientific Interest (SSSIs).
- 6.16.10 The application site lies approx. 4.8 km west of the Epping Forrest Special Area of Conservation (SAC) at its closest point. However, it is within the Zone of Influence (ZOI) of 6.2km as defined by Natural England in their Interim Guidance. The Epping Forest SAC is one of only a few remaining large-scale examples of ancient wood-pasture in lowland Britain and has retained habitats of high nature conservation value. Epping Forest SAC is also underpinned by a SSSI designation.
- 6.16.11 The Lea Valley SPA site is carefully managed to avoid impacts, with only limited access allowed to the wetland itself, with access closed seasonally to avoid impacts to wintering bird populations. As such, adverse effects as a result of increased recreational pressure are not considered likely. Likewise, the proposed scheme, with its limited car parking provision and promotion of use of electric vehicles by providing Electric Vehicle Charging Points is not expected to result in an adverse air quality effect.
- 6.16.12 The applicant’s assessment also notes that the Habitat Regulations Assessments (HRA) for alterations to the Strategic Policies and The Tottenham Area Action Plan both conclude that there will be no likely significant effect on Epping Forest SAC through increased recreational pressure as nowhere within the Borough lies within the core recreational catchment for the site. The applicant’s assessment concludes that potential risks to the SAC are further reduced by the proposed integration of greenspace within the proposed scheme, providing a link between residents and nature and that no direct or indirect significant adverse effects on Epping Forest SAC are expected because of the proposed scheme.

6.16.13 Natural England has reviewed the application and has raised no objection. Given the applicant's assessment and Natural England's response, officers consider the development would not give rise to likely significant effects on European designated sites (Lee Valley SPA and Epping Forest SAC) pursuant to Section 63(1) of the Conservation of Habitats and Species Regulations 2017 ("the Habitats Regulations"). An integrity test is therefore not required, and the proposal is in accordance with Policies SP13 and DM19. The site is greater than 500m from the Lee Valley SPA, so Policy AAP6 does not apply.

6.17 Waste and Recycling

6.17.1 London Plan Policy SI7 calls for development to have adequate, flexible, and easily accessible storage space and collection systems that support the separate collection of dry recyclables and food. Local Plan Policy SP6 and Policy DM4 require development proposals make adequate provision for waste and recycling storage and collection.

6.17.2 The applicant's Waste Management Plan has been developed in accordance with guidance provided by Waste officers and BS 5906:2005 Waste management in buildings – a code of practice. The key principles include:

- Commercial and PBSA waste would be stored separately;
- The waste collector would not be required to pull full containers more than 10m to the collection vehicle;
- A minimum clear space of 150mm would be allowed between containers;
- Waste rooms would be designed and fitted out so they could be washed down and fire resistant;
- Waste collection vehicles would not be required to reverse more than 12m;
- Access roads for waste vehicles would have a minimum clear width of 5.0m and a maximum gradient of 1:12; and
- Storage and loading areas would be level, smooth, hard surfaced and provide drop kerbs and have a maximum gradient of 1:14 if the ground slopes down towards the collection vehicle.

6.17.3 PBSA waste, recycling and food waste would be collected weekly and storage space has been provided in accordance with the generation rates provided by waste officers. Space has also been provided for bulky/non-standard waste items. The proposed waste stores have been distributed between opposite ends of the building to the north and south to minimise the travel distance between the student bedspaces and their allocated waste store.

6.17.4 Stores for the north and eastern sections of the building would be within 10m of the proposed collection point on Brunswick Square. In the interim condition, waste from residential Core C (southwestern part of the site) would be moved to the Brunswick Square collection point by on site management staff.

- 6.17.5 In the longer term, as and when the Peacock Industrial Estate is developed in line with the HRWMF, collections from the southwestern part of the site would be able to be made directly from a new north-south street.
- 6.17.6 Occupants of the PBSA units above the ground floor level of the High Road frontage buildings would take out their waste to the High Road kerb side on bin collection day. It is recommended that a Student Accommodation Waste Management Plan that captures the proposed arrangements and responsibilities is secured by planning condition.
- 6.17.7 The proposed commercial and ancillary PBSA waste rooms have been sized for four days' worth of waste storage, although collections are anticipated to be daily. As with the PBSA waste storage, the proposed commercial/ancillary PBSA waste stores have been distributed between opposite ends of the building to the northeast and southwest to minimise the travel distance between the spaces and their allocated waste store.
- 6.17.8 Waste would be taken to the stores by the tenants and then the on-site team would take the waste from the commercial waste stores to the collection point on Brunswick Square each day immediately prior to collection. Commercial tenants would collect residual, mixed dry recyclable, glass and food waste separately. Commercial waste would be collected each day from a collection point next to Brunswick Square.
- 6.17.9 LBH Waste officers previously advised of their resistance to waste having to be presented on the High Road during consultation on the extant scheme. However, they accept this arrangement given that it is an existing arrangement and given the fact that the proposal would reduce the number of homes using this arrangement.
- 6.17.10 Waste Officers previously have also acknowledged that heritage and activation factors prevent internal storage and that other options are unworkable due to distance. In this context, waste officers accept the presentation of waste on street during allotted time bands by the units above ground floor on the High Road.
- 6.17.11 Following discussions between the applicant and Waste Officers the applicant amended the plans in the extant scheme to show the proposed incorporation of a dedicated discreet and small bin store along Brunswick Square for the exclusive use of the residential flats above the High Road properties to further mitigate the issues with refuse being presented on the street.

6.17.12 Such an approach would not be possible under the current scheme as there would not be a suitable location for the bin store. The cinema in the previous scheme meant there was a longer northern flank and more opportunity for storage solutions near the High Road. The current scheme has the opening to the first courtyard and then waste storage for the corner commercial unit. Beyond this point any possible locations would be too far from the High Road frontage to be suitable.

6.17.13 Whilst the presentation of waste on the High Road is unfortunate given the circumstances whereby it is an existing arrangement and there are limited viable alternatives it is considered an acceptable arrangement for the small number of PBSA units located above first floor level in the High Road frontage buildings.

6.18 Land Contamination

6.18.1 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.

6.18.2 The applicant's Land Contamination Assessment (Phase 1) reports on an initial Conceptual Site Model and a Preliminary Risk Assessment – taking account of ground conditions and the current and previous uses of the site.

6.18.3 It concludes by identifying Low to Moderate potential risks to a range of receptors, including construction workers and residents and recommends that a ground investigation is carried out to appraise the extent of Made Ground, the gas regime, and the shallow groundwater regime. It also recommends that an Unexploded Ordnance survey is undertaken.

6.18.4 LBH Pollution officers raise no objection, subject to standard conditions on Land Contamination and Unexpected Contamination.

6.19 Archaeology

6.19.1 The NPPF (para. 194) states that applicants should submit desk-based assessments, and where appropriate undertake field evaluation, to describe the significance of heritage assets and how they would be affected by the proposed development.

6.19.2 London Plan Policy HC1 states that applications should identify assets of archaeological significance and avoid harm or minimise it through design and appropriate mitigation. This approach is reflected at the local level in Policies AAP5 of the Tottenham Area Action Plan and DM9 of the DM DPD.

- 6.19.3 The site forms part of an Archaeological Priority Area, due to evidence of a Medieval settlement with possible Anglo-Saxon roots and the presence of a former Roman road (Roman Ermine Street). The application is supported by an Archaeological Desk Based Assessment that reports on an assessment of the likely below ground archaeological potential of the site.
- 6.19.4 This finds that the site can be considered likely to have a theoretical archaeological potential for the Roman period, associated with the road alignment running along the eastern boundary, together with a low to moderate archaeological potential for the Medieval period.
- 6.19.5 The available information indicates that areas of the site were developed from the eighteenth century onwards. The Assessment concludes by noting that if hitherto unknown archaeological remains were to be present within the site, they are considered most likely to be of local significance.
- 6.19.6 The Greater London Archaeological Advisory Service (GLAAS) has assessed the proposal and recommended a two-stage process of archaeological investigation comprising evaluation to clarify the nature and extent of any surviving remains, followed, if necessary, by a full investigation. A further written scheme of historic building investigation is also recommended. It is recommended that planning conditions secure this approach.

6.20 Fire Safety and Security

- 6.20.1 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. The Mayor of London has published draft guidance of Fire Safety (Policy D12(A), Evacuation lifts (Policy D5(B5) and Fire Statements (Policy D12(B)).
- 6.20.2 The application is supported by a Fire Statement that meets the requirements of a Fire Statement required by London Plan Policy D12 (A). The application has been the subject to a Gateway 1 consultation with the Health and Safety Executive.
- 6.20.3 The Health and Safety Executive (HSE) are the statutory consultee for relevant planning applications (of 2 or more dwellings within buildings 18m/7 storeys or more in height) through planning gateway one which requires developers to submit a fire statement setting out fire safety considerations specific to the development.
- 6.20.4 The HSE have commented advising that they are content with the fire safety design as set out in the project description, to the extent it affects land use planning considerations. The Council's Building Control team have also

commented and state that the fire strategy is satisfactory, being very advanced and clearly meeting all the requirements from a planning point of view.

6.20.5 A condition is recommended which requires the developer to show that the proposed public hydrants are operational, or if not, demonstrate what the alternative solution is and prove its acceptability.

6.20.6 It is recommended that, in accordance with the Mayor of London's draft guidance, it should include a planning condition requiring the development to be carried out in accordance with the planning fire safety strategy (included in the Fire Statement).

6.20.7 The development would be required to meet the Building Regulations in force at the time of its construction – by way of approval from a relevant Building Control Body, including as part of Gateway 2. As part of the plan checking process a consultation with the London Fire Brigade would be carried out. On completion of the work, the relevant Building Control Body would issue a Completion Certificate to confirm that the works comply with the requirement of the Building Regulations.

6.21 Equalities

6.21.1 In determining this planning application, the Council is required to have regard to its obligations under equalities legislation including obligations under the Equality Act 2010. In carrying out the Council's functions due regard must be had, firstly to the need to eliminate unlawful discrimination, and secondly to the need to promote equality of opportunity and to foster good relations between persons who share a protected characteristic and persons who do not share it. Members must have regard to these duties in taking a decision on this application.

6.21.2 As noted in the various sections in this report, the proposed scheme would provide a range of socio-economic and regeneration outcomes for the Tottenham area including commercial space and 287 student bedspaces (including 35% affordable student accommodation). This would contribute to the overall housing provision and would add to Haringey's stock of homes at a ratio of 2.5:1 which equates to 114 homes (net gain of 101 homes).

6.21.3 An employment skills and training plan, which is recommended to be secured by a S106 planning obligation, would ensure a target percentage of local labour is utilised during construction and a financial contribution towards apprenticeships. This would benefit priority groups that experience difficulties in accessing employment.

6.21.4 The proposed scheme would add to the stock of wheelchair accessible student accommodation in the locality and planning conditions would help ensure that

inclusive design principles are followed in the proposed layout and landscaping, in accordance with London Plan and local planning policy requirements.

6.22 Conclusion

6.22.1 The proposed scheme would result in a residential-led mixed-use development of approx. 3.33% of the High Road West NT5 Site Allocation. The incremental development of the Site Allocation is acceptable in principle and the proposed scheme would satisfactorily:

- (i) safeguard the continued operation of industrial uses on the Peacock Industrial Estate in the existing context and
- (ii) not prejudice the ability of the adjoining land to be developed in general accordance with Policy NT5 requirements and guidelines and the adopted High Road West Masterplan Framework in the longer term.

The proposed application scheme

6.22.2 The current proposal has a similar built form to the extant permission and consent (HGY/2023/2306 & 2307) albeit with some modifications to accommodate the change to PBSA and the removal of the cinema. The basement has been removed and some massing has been added to the western end of the proposal with the set-back upper floor levels enlarged. There are minimal changes to the High Road heritage frontage with the main change being the inclusion of the open courtyard behind the High Road buildings.

6.22.3 The loss of existing uses would be acceptable given that the existing banqueting suite it is not protected by policy, there is adequate retail provision in the nearby Local Centre, and the proposals would retain active commercial uses on the ground floor of the High Road. The proposed accommodation would make a notable contribution to meeting Haringey's London Plan housing target and the flexible non-residential units would help mitigate loss of existing employment and enliven street frontages.

6.22.4 Officers welcome the proposed site layout, which locates the taller elements away from the heritage assets and the historic High Road. The scheme would also improve the surfacing and legibility of Brunswick Square and Percival Court. The scheme would also connect with and generally relate well with the existing situation whilst enabling incorporation into future proposals for NT5 as they come forward.

6.22.5 The affordable housing offer is based on a Fast Track approach (not requiring a Financial Viability Appraisal) of 35% affordable student accommodation, which is considered acceptable given the characteristics of the site and the proposed affordable accommodation would be satisfactorily integrated with market student accommodation across the site. Officers consider that the offer would

be acceptable, subject to s106 planning obligations securing viability reviews and ensuring affordability.

6.22.6 The scheme would be liable to a higher CIL rate than the extant permission to support infrastructure such as open space and social infrastructure and could also help fund planned additional provision of healthcare and wellbeing facilities to meet the demands from the new residents.

6.22.7 The proposed density of the scheme is considered acceptable given its location and access to amenities, and high public transport accessibility level. 10% of the accommodation would be 'wheelchair accessible'. The proposed accommodation would generally be high-quality and future residents would enjoy an acceptable level of amenity (in terms of aspect, size of homes, open space, outlook/privacy, daylight and sunlight, noise, and air quality). The proposed fire strategy set out in the submitted Fire Statement is also considered acceptable.

6.22.8 Officers do not consider that the proposed scheme, which is a maximum of 7-storeys, constitutes a 'tall building' for the purposes of the HRWMF assessment and Haringey Local Plan Policy. The form of the building steps up in height away from the heritage assets to the High Road and the taller elements are useful for wayfinding and are likely to fit in well with the rest of the masterplan.

6.22.9 Officers are satisfied that the architectural quality of the proposed buildings is of a sufficiently high-quality to justify their proposed height and form and their likely effects on surrounding townscape. As such, it is considered that the proposed buildings would meet the policy tests established by the NPPF, London Plan Policy D9, Strategic Policy SP11, TAAP Policy AAP6 and DPD Policies DM1 and DM6).

6.22.10 As set out in under Heritage Conservation, whilst officers consider that the proposed scheme would result in 'less than substantial harm' to the wider setting and significance of several heritage assets, they consider that the proposed scheme would result in the following significant public benefits that would outweigh this harm:

- Securing the long-term future of the Grade II listed 819-821 High Road and the locally listed buildings at 823-827 High Road;
- Integrating the statutorily and locally listed buildings at 819-827 High Road within the development, better revealing their significance in the process and enhancing their overall appearance and setting within the Conservation Area;
- Responding to Haringey's acute housing needs including the delivery of student accommodation, which would contribute 114 homes (net gain of 101 homes) to Haringey's London Plan housing target;
- Creating a new, high-quality entranceway to Brunswick Square that opens views into a well-designed and active streetscape. Coupled with the creation

of a high-quality, accessible, and secure public realm along Brunswick Square, this represents a significant improvement to the existing alleyway which is unattractive and unsafe;

- Achieving a better townscape legibility and integration of the site within the wider site allocation;
- Making a meaningful contribution to the wider regeneration objectives for North Tottenham and Site Allocation NT5;
- Attracting new investment and visitors to North Tottenham, with the proposed commercial uses bringing new attractions and spending to the local area. Together with annual household spending from the new accommodation each year in the local area;
- The creation of new employment opportunities during the construction and operational phases, with opportunities for local recruitment and skills development;
- Acting as a catalyst for investment and further regeneration of Site Allocation NT5 and the wider area, redressing inequality and halting further decline in Tottenham without prejudicing other development in the vicinity; and
- Complementing the ongoing regeneration of Tottenham that has taken place to the east, notably within the NDP and Northumberland Terrace.

6.22.11 Amenity impacts must be considered in the overall planning balance, with any harm weighed against expected benefit. There would be some adverse impacts on amenity, as outlined above. However, officers consider that the level of amenity that would continue to be enjoyed by neighbouring residents is acceptable, given the benefits that the proposed scheme would deliver.

6.22.12 The proposed scheme would improve connectivity and permeability between the masterplan area and High Road and White Hart Lane, without creating a rat-run for motor traffic. The scheme would have blue badge limited car parking and sufficient cycle parking, in line with policy requirements, and additional road traffic would be relatively small.

6.22.13 Assessment by the applicant demonstrates that (when taking account of the proposed scheme, committed development and the Lendlease proposals, there is unlikely to be significant impacts on London Overground line capacity or bus capacity and no discernible impact on the Victoria Line. Planning conditions and s106 planning obligations could help manage on and off-site car parking and ensure that Car Club provision, travel planning, delivery and servicing and construction activities are satisfactory.

6.22.14 The proposed buildings, open space, landscaping, and sustainable drainage features have generally been designed to take account of climate change and to reduce carbon emissions (although expected carbon savings from built fabric performance is below what policy expects).

6.22.15 Planning conditions could secure commitments in relation to water usage, BREEAM 'Very Good' for the commercial units and measures to further the Circular Economy agenda. Subject to s106 planning obligations, the scheme would be connected to the proposed Heat Network and include some roof level PVs to help deliver 68% carbon emissions savings (SAP2012 carbon factors) (with offsetting financial contributions making up the shortfall). This is also likely to improve as the detailed design comes forward.

6.22.16 Recommended planning conditions require provision of bird and bat boxes in trees and buildings to encourage biodiversity and deliver a Biodiversity Net Gain. Officers do not consider that the scheme would give rise to significant effects (recreational pressure or air quality) on the Lee Valley or Epping Forest important European nature conservation sites.

6.22.17 Flood risk is low and likely environmental impacts, including noise, air quality, waste and recycling and land contamination, and archaeology could be made acceptable by use of planning conditions.

6.22.18 The proposed scheme would provide an accessible and safe environment and additional affordable student accommodation. Subject to securing the delivery of various features and provisions identified in this report as well as local employment and training obligations, officers consider that the proposed scheme would have a positive equalities impact.

Overall

6.22.19 Subject to the recommended planning conditions and s106 planning obligations to secure necessary mitigation and policy objectives, officers consider that the proposed scheme is acceptable on its own merits, when considered against the development plan and all other material considerations.

7 COMMUNITY INFRASTRUCTURE LEVY (CIL)

7.1 Based on the information given on the plans, the Mayoral CIL would be approximately £446,105.05 and the Haringey CIL charge would be £652,135.75.

7.1.1 If planning permission were granted, the CIL would be collected by Haringey after/should the scheme is/be commenced and could be subject to surcharges for failure to assume liability, for failure to submit a commencement notice and/or for late payment, and subject to indexation. An informative should be attached to any planning permission advising the applicant of this charge.

7.1.2 The proposed development would be liable to pay the Haringey CIL rate that is in effect at the time that any permission is granted.

8 RECOMMENDATIONS

- 8.1 GRANT planning permission and listed building consent subject to conditions and the signing of an associated s106 agreement for the reasons set out in Section 2 above.