

Planning Sub Committee – 07 March 2024

REPORT FOR CONSIDERATION AT PLANNING SUB-COMMITTEE

1. APPLICATION DETAILS

Reference No: HGY/2023/0728

Ward: Hermitage & Gardens (Adjacent to Seven Sisters)

Address: 341A Seven Sisters Road, Tottenham, London, N15 6RD

Proposal: Construction of two new buildings to provide new warehouse living accommodation (Sui Generis (warehouse living)), ground floor café/ workspace (Use Class E) and associated waste collection and cycle parking. Erection of 10 stacked shipping containers (two storeys) to provide workspace/ artist studios (Use Class E), toilet facilities and associated waste collection and cycle parking. Landscape and public realm enhancements including the widening of and works to an existing alleyway that connects Seven Sisters and Tewkesbury Road, works to Tewkesbury Road, the creation of rain gardens, greening, seating, signage and artworks and all other associated infrastructure works, including the removal of an existing and the provision of a new substation to service the new development.

Applicant: Provewell Ltd.

Ownership: Private

Case Officer Contact: Philip Elliott

Date received: 14/03/2023

Last amended date: 08/01/2024

- 1.1 The application has 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.
- 1.2 The planning application has also been referred to the Mayor of London as it meets Category 1C (*The building would be more than 30 metres high and outside the City of London*) as set out in the Town and Country Planning (Mayor of London) Order 2008.

SUMMARY OF KEY REASONS FOR RECOMMENDATION

- The principle of new Warehouse Living development is supported as the scheme meets key requirements of policies DM38, DM39 as well as Site Allocation SA34.
- The proposals would increase employment floorspace and the submission of a Masterplan Framework identifies how the proposal would provide for the needs of residents and fit in with future development within other parts of the allocation.
- Warehouse Living is by its nature and provides workspace within the living space the combination of workspaces and accommodation cuts costs by avoiding the need for residents to have to rent both a home/room as well as a space to work.
- A late-stage review would secure a contribution to affordable housing if rents exceed those set out in the viability report when any increase in costs is accounted for. The rents would be monitored over time to inform any future proposals for Warehouse living.
- The proposed development would not cause unacceptable harm to the amenity of surrounding residential properties.
- The proposal provides a unique high-quality design that acts as a positive gateway to the Warehouse District and responds to the QRP comments and satisfies Local Plan and London Plan requirements.
- The overall quality of the proposed Warehouse Living accommodation is good will meet the host community's future accommodation needs for creative living and working;
- The proposed scheme would preserve nearby listed buildings and their setting and the character and appearance of nearby conservation areas. The proposal would have a minor impact on views of medium value from Vartry Road on locally listed building Woodberry Down Baptist Church the resultant harm falls in the less than substantial category.
- The proposal incorporates several sustainability measures and satisfies relevant London Plan Policies

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** 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 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 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 Planning Sub-Committee.

- 2.3 That the section 106 legal agreement referred to in resolution (2.1) above is to be completed no later than 28/06/2024 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; and
- 2.4 That, following completion of the agreement referred to in resolution (2.1) within the time period provided for in resolution (2.3) above, planning permission be granted in accordance with the Planning Application subject to the attachment of conditions.

Conditions (the full text of recommended conditions is contained in Appendix 1 of this report)

- 1) 3-year time limit
- 2) Approved Plans & Documents
- 3) Accessible Accommodation
- 4) Commercial Units - Ventilation/Extraction
- 5) Commercial Units - Café/restaurant Opening Hours
- 6) BREEAM Certificate
- 7) Below ground works impact mitigation measures
- 8) Commercial Units – Noise Attenuation
- 9) Noise Attenuation – Warehouse Living Accommodation
- 10) Fire Statement
- 11) Landscape Details
- 12) Biodiversity
- 13) External Materials and Details
- 14) Artwork Details
- 15) Living roofs
- 16) Energy Strategy
- 17) Overheating (Warehouse Living)
- 18) Overheating (Commercial areas)
- 19) Building User Guide
- 20) Metering Strategy
- 21) DEN Connection
- 22) Urban Greening Factor
- 23) Secured by Design
- 24) Circular Economy
- 25) Whole Life Carbon
- 26) Land Contamination
- 27) Unexpected Contamination
- 28) Cycle Parking details
- 29) Delivery and Servicing Plan
- 30) Warehouse Living Waste Management Plan

- 31) Commercial Waste Management Plan
- 32) Detailed Construction Logistics Plan (PRE-COMMENCEMENT)
- 33) Public Highway Condition (PRE-COMMENCEMENT)
- 34) Demolition/Construction Environmental Management Plans (PRE-COMMENCEMENT)
- 35) Management and Control of Dust (PRE-COMMENCEMENT)
- 36) Non-Road Mobile Machinery 1
- 37) Non-Road Mobile Machinery 2
- 38) Piling Method Statement (PRE-PILING WORKS)
- 39) Construction Near Water Main (PRE-CONSTRUCTION within 5m of a water main)
- 40) Business and Community Liaison Construction Group (PRE-COMMENCEMENT)
- 41) Telecommunications
- 42) Water Efficiency Condition
- 43) Noise from building services plant and vents
- 44) Anti-vibration mounts for building services plant / extraction equipment
- 45) London Underground Infrastructure Protection 1 (PRE-COMMENCEMENT)
- 46) London Underground Infrastructure Protection 2
- 47) London Underground Infrastructure Protection 3
- 48) Landscape and Ecological Management Plan (LEMP)
- 49) Wind Mitigation – Terraces
- 50) Details of bed decks
- 51) Warehouse Living Management Plan
- 52) Public Right of Way (PROW) rerouting, design, and management details
- 53) Requirement to enter into a s278 agreement

Informatives

- 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) Disposal of Commercial Waste
- 9) Piling Method Statement Contact Details
- 10) Minimum Water Pressure
- 11) Paid Garden Waste Collection Service
- 12) Sprinkler Installation
- 13) Designing out Crime Officer Services
- 14) Land Ownership
- 15) Site Preparation Works
- 16) s106 Agreement and s278 Agreement
- 17) Revised Fire Statement required with any revised submission

- 18) Building Control
- 19) Building Regulations – Soundproofing
- 20) Thames Water Groundwater Risk Management Permit

Section 106 Heads of Terms (HoTs):

- 1) **Provision of workspace for residents & management plan**
Workspace to be provided within the below ground workshop spaces in Block A for the use of residents of the development in perpetuity from initial occupation. A management plan shall also be submitted to outline how the workspace will be allocated and managed to optimise usage and support residents that work in the creative industries. If spaces are not taken up by residents, then space could be used by other creatives.
- 2) **Affordable workspace**
10% of the commercial floorspace to be let out at an affordable rent. Obligations shall identify the location of this floorspace and secure it as affordable in perpetuity in line with the Planning Obligations SPD.
- 3) **Viability Review Mechanism**
 - a. Early-Stage Review if not implemented within 2 years;
 - b. Development Break review – review if construction is suspended for 2 years or more; and
 - c. Late-Stage Review with a cap equivalent to 50% affordable housing.
- 4) **Employment & Skills Plan**
All relevant clauses stated in the Planning Obligations Supplementary Planning Document (SPD) 2018. In summary to include:

Construction Phase Skills and Training

 - To include planning obligations relating to Notification of Vacancies, Local Labour, and Apprenticeships.
 - A commitment to being part of the borough's Construction Programme for the construction phase.
 - To include a support fee, and any in lieu financial contribution, payable upon agreement of a Local Training and Employment Plan.
 - Work placement, and STEM and career education workshops.
 - Monitoring – Submitting monthly reports and evidence.

End-user Phase Skills and Training

 - The developer shall be required to work with the Council to maximise opportunities for local residents in the development and provide career education where practicable.
- 5) **Travel Plans for Warehouse Living and Commercial uses and monitoring**

Warehouse Living Travel Plan:

- Within six (6) months of first occupation of the proposed Warehouse Living a Travel Plan for the use must be submitted to and approved in writing by the Local Planning Authority detailing means of conveying information for new occupiers and techniques for advising residents of sustainable travel options.
- The Travel Plan shall then be implemented in accordance with a timetable of implementation, monitoring, and review to be agreed in writing by the Local Planning Authority,
- The following measures to be included as part of the travel plan in order to maximise the use of sustainable modes of active transport.
 1. The developer must appoint a travel plan co-ordinator, working in collaboration with the Estate Management Team, to monitor the travel plan initiatives annually for a minimum period of 5 years.
 2. Provision of welcome induction packs containing public transport and cycling/walking information to every new resident, along with a £200 voucher for active travel related equipment purchases.
 3. Pay a sum of, £3,000 (three thousand pounds) per year for a period of five years £15,000 (fifteen thousand pounds) in total for the monitoring of this travel plan initiative.
 4. Parking management plan which monitors the provision of disabled car parking spaces for the site and triggers any necessary provision on the local highways network.

Commercial Travel Plan:

- Within six (6) months of first occupation of the proposed commercial spaces a Travel Plan for the use must be submitted to and approved in writing by the Local Planning Authority.
- The Travel Plan shall then be implemented in accordance with a timetable of implementation, monitoring, and review to be agreed in writing by the Local Planning Authority,
- The following measures to be included as part of the travel plan in order to maximise the use of sustainable modes of active transport.
 1. The developer must appoint a travel plan co-ordinator, working in collaboration with the Estate Management Team, to monitor the travel plan initiatives annually for a minimum period of 5 years.
 2. Provision of commercial induction packs containing public transport and cycling/walking information, available bus/rail/tube services, showers, lockers, map and timetables to all new staff, travel pack to be approved by the Councils transportation planning team.

3. The developer will be required to provide, showers lockers and changing room facility for the commercial element of the development where practicable.
4. The developer is required to pay a sum of £2,000 (two thousand pounds) per year per travel plan for monitoring of the travel plan for a period of 5 years.
5. The first surveys should be completed 6 months post occupation or on 50% occupation whichever is sooner.

6) Car capping (£4,000 contribution)

No future occupiers (except those with a blue badge) will be entitled to apply for a resident or business parking permit under the terms of the relevant Traffic Management Order controlling on-street parking in the vicinity of the development. £4,000 for revising the associated Traffic Management Order.

7) Car Club

Use all reasonable endeavours to establish a car club facility in the form of an on-street car club bay in the vicinity of the application site for the occupants of the development. To include the provision of three years' free membership for all residents and £100 (one hundred pounds in credit) per year/per resident for the first 3 years.

8) Considerate Constructors Scheme

A commitment to sign up to the scheme for the entirety of construction works.

9) Ultrafast broadband connectivity

All rooms of accommodation must have access to high-quality digital connectivity (above 100MB/s) for occupants through ultrafast broadband connections.

10) Carbon Management & Sustainability

- Be Seen commitment to uploading energy data
- Energy Plan to recalculate the performance at commencement
- Sustainability review to confirm the performance prior to occupation
- DEN connection (and associated obligations) if this becomes available within the next 10 years

11) Carbon offsetting

Indicative carbon offset contribution (and associated obligations) of £20,805, plus a 10% management fee; an indicative carbon offset contribution to be re-calculated at £2,850 per tCO₂ at the Energy Plan stage with a 50% payment prior to implementation, and actual carbon offset contribution calculation at Sustainability Review stage following completion and payment for the remaining amount due prior to occupation.

12) Monitoring costs

Based on 5% of the value of the financial planning obligations included in the agreement (capped at £55,000), and £500 per non-financial planning obligation in the agreement.

Section 278 Highways Legal Agreement Heads of Terms

13) Public Realm works

The developer shall be required to enter into an agreement with the Highway Authority under Section 278 of the Highways Act to pay for any necessary highway works relating to the delivery of the footway and Tewksbury Yard/Road public realm part of the proposals.

14) Street works

The works include but are not limited to the removal of the crossover to the site to reinstate the footway and / or the creation of at least 3 on-street disabled car parking bays and their electrification.

15) Works to the TLRN on Seven Sisters Road

Planters and cycle parking to be agreed with TfL and secured via s278 agreement.

2.5 In the event that members choose to make a decision contrary to officers' recommendation members will need to state their reasons.

2.6 That, in the absence of the agreement referred to in resolution (2.1) above being completed within the time period provided for in resolution (2.3) above, the planning permission be refused for the following reasons:

1. In the absence of a legal agreement securing 1) workspace for residents & an associated management plan and 2) viability review mechanisms - the proposals would fail to provide sufficient workspaces for Warehouse Living in accordance with Development Management DPD policy DM39, and comply with Policy H5 of the London Plan and the Mayor's Affordable Housing and Viability Supplementary Planning Guidance (SPG).
2. In the absence of a legal agreement securing Affordable workspace, the scheme would fail to accord with Development Management DPD policy DM39.
3. In the absence of legal agreement securing 1) Travel Plans and financial contributions toward travel plan monitoring, 2) Traffic Management Order (TMO) amendments to change car parking control measures - 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, and DM DPD Policy DM31.

4. 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.
5. In the absence of a legal agreement securing the implementation of an energy strategy, including the prioritisation of a 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.
6. In the absence of a legal agreement securing the developer's participation in the Considerate Constructor Scheme, 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.

2.7 In the event that the Planning Application is refused for the reasons set out in resolution (2.6) above, the Head of Development Management or the Assistant Director of Planning, Building Standards & Sustainability (in consultation with the Chair of Planning sub-committee) is hereby authorised to approve any further application for planning permission which duplicates the Planning Application provided that:

- (i) There has not been any material change in circumstances in the relevant planning considerations, and
- (ii) The further application for planning permission is submitted to and approved by the Head of Development Management or the Assistant Director of Planning, Building Standards & Sustainability within a period of not more than 12 months from the date of the said refusal, and
- (iii) The relevant parties shall have previously entered into the agreements contemplated in resolution (2.1) above to secure the obligations specified therein.

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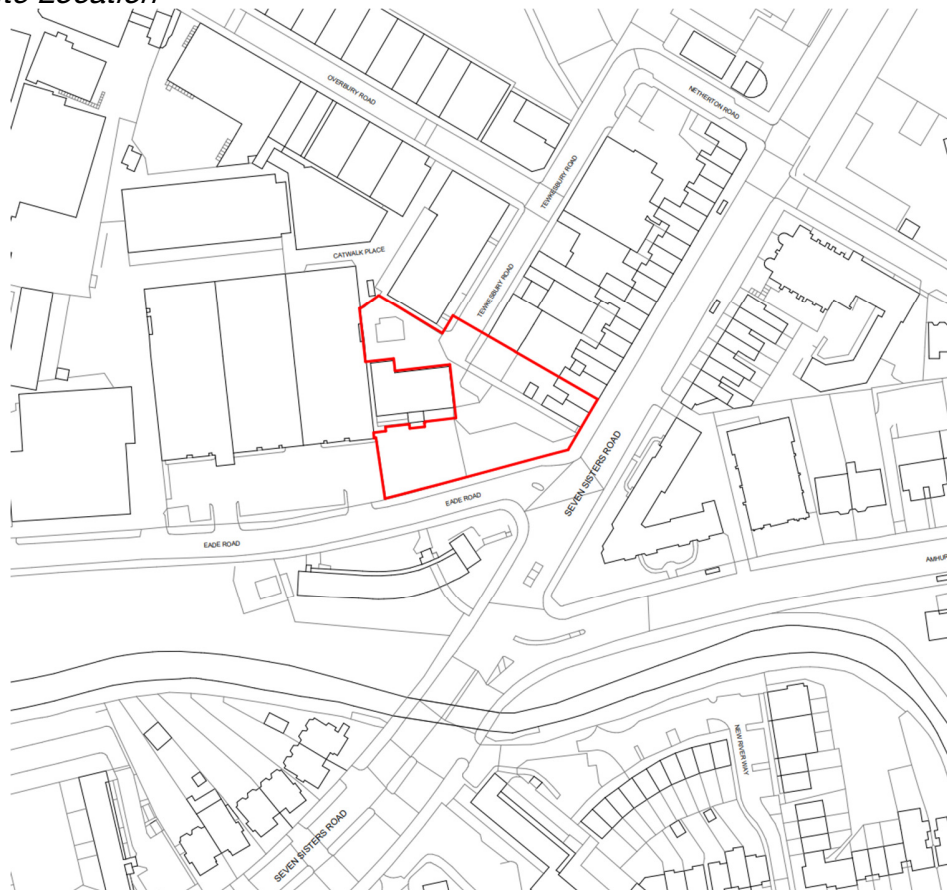
3.0 PROPOSED DEVELOPMENT AND LOCATION DETAILS

3.1. Site and Surroundings

3.1.1 The site consists of a parcel of land adjacent to 341A Seven Sisters Road. The site includes a staircased public right of way which descends from Seven Sisters Road to Tewksbury Road. The site also includes the land to the front and rear of 339 & 341A Seven Sisters Road (“Cara House”) and land to the rear of 341 & 343 Seven Sisters Road. The site measures approximately 0.23 hectares.

3.1.2 The triangular corner of the site at the junction of Eade Road and Seven Sisters Road is made up of hardstanding alongside the adjacent highways with trees/shrubs beyond. The land levels then fall dramatically beyond this to the north by approximately 2 storeys from Seven Sisters Road down to Tewksbury Road.

Figure 1 – *Site Location*



3.1.3 To the front and rear of Cara House is a hardstanding yard which is used for parking and cycle/refuse storage and outdoor amenity purposes. The site is for the most part vacant/open land which surrounds the existing Cara House

building and extends across an existing footpath and the lower floors and rear of 341 and 343 Seven Sisters Road / 2-4 Tewkesbury Road which forms the northeast border of the site. Eade Road forms the southern border of the site.

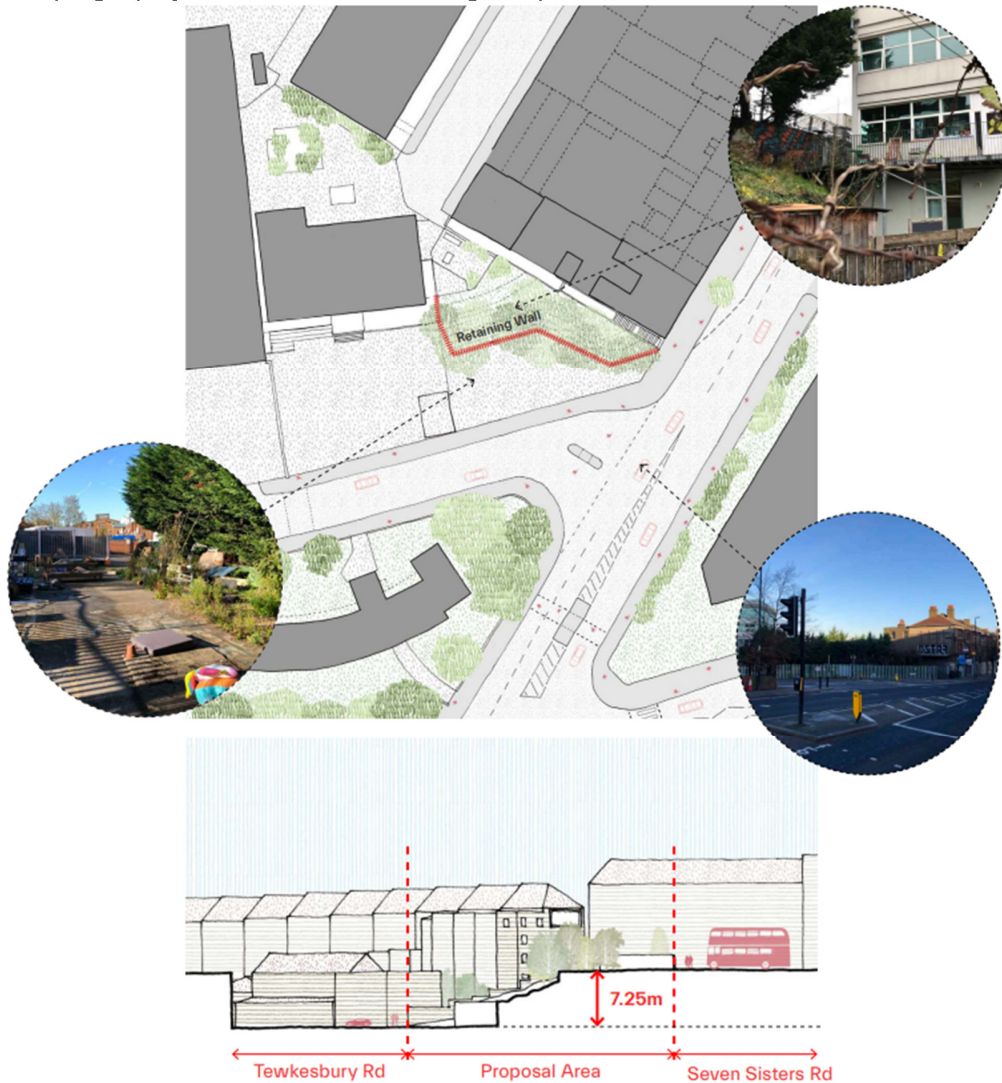
3.1.4 The site parcels are shown in the image below:

Figure 2 – *Site Parcels*



3.1.5 The site slopes significantly downwards from Eade Road at the southern edge of the site (26.8 m AOD), to Tewkesbury Road to the northeast (19.3 m AOD). The footpath referred to above is a staircased alleyway/passageway formed by an existing retaining wall bordering the site, and the flank wall of number 341 Seven Sisters Road. The footpath is a Public Right of Way (PROW).

Figure 3 – *Topography of the site – showing drop from Seven Sisters to Tewksbury Rd*



- 3.1.6 The public right of way comprises a steep staircase and then a sloping ramp down to Tewksbury Road. It is a narrow passage that falls between the flank wall and boundary of 341 Seven Sisters Road and land to the east of Cara House. The walkway is well used but has no passive surveillance from adjacent buildings and has an unsafe feeling, particularly at nighttime.

Figure 4 – *Public Right of Way – staircased passage/alleyway from Seven Sisters to Tewksbury Rd*



Transport

- 3.1.7 The site is approximately equidistant between Manor House Underground Station to the southwest (on the Piccadilly Line) and Seven Sisters Underground Station to the northeast (on the Victoria Line). Stamford Hill Station, 10 minutes' walk to the east of the site, is on the London Overground. With Harringay Green Lanes, also on the Overground, located a 15 minutes' walk to the west.
- 3.1.8 Seven Sisters Road is the A503 which leads to the A10 Tottenham High Road; extensive bus services operate on Seven Sisters Road, Amhurst Park, and the surrounding area. The site has a high Public Transport Accessibility Level (PTAL) of 5 (with 0 being the worst and 6b the best).

Harringay Warehouse District (HWD)

- 3.1.9 The site falls within the Harringay Warehouse District (HWD) area which The Site Allocations DPD states is a collection of buildings that are commercial in nature and of a range of quality. There is a strong link to the textile manufacturing trade, although there is a wide range of goods manufactured within the employment area.
- 3.1.10 Warehouse Living is a specific type of land use that has emerged over time in certain employment locations within Haringey and lends particular support to

creative industries. It does not fall within a specific use class – and is not live/work development – and as such is considered a Sui Generis use; so does not fit within any established use class.

3.1.11 The Council has made provision for proposals for Warehouse Living, at selected locations within the Harringay Warehouse District as defined in the Site Allocations DPD, and the Fountayne & Markfield Road area as defined in the Tottenham Area Action Plan. Warehouse Living proposals will only be acceptable within these areas.

3.1.12 The Warehouse Living Sites in the area are shown below in Figure 5. This site sits within Site Allocation SA34.

Figure 5 – *Warehouse Living Sites in HWD*



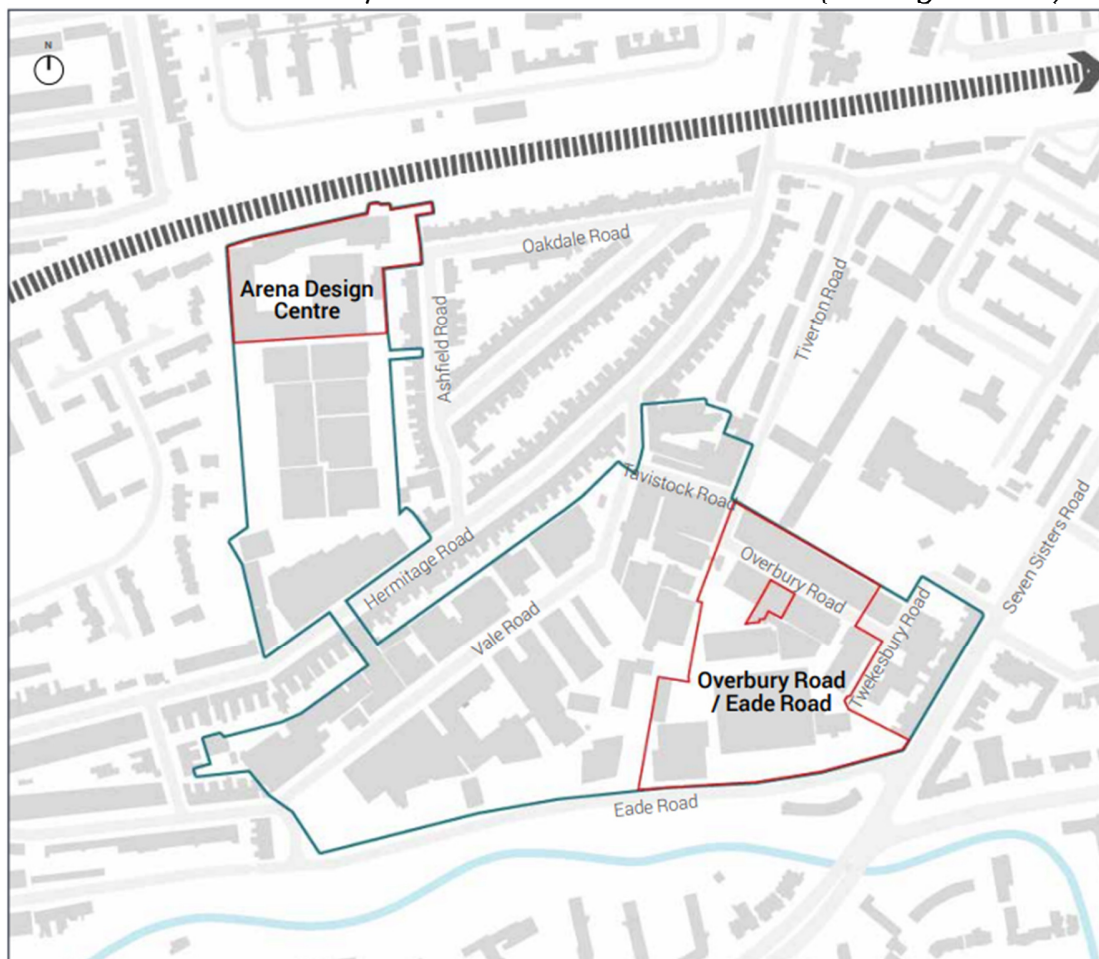
3.1.13 The HWD is split into two sections – north and south of Hermitage Road. Arena, Crusader, and Omega are located to the north, and the Vale/Eade Road, and Overbury/Eade Road areas are located to the south closer to the New River and the Borough boundary with Hackney. Both areas are subject to significant authorised and unauthorised residential occupation in the form of Warehouse Living. This has arisen organically over the past 10-15 years.

3.1.14 The vision for the area outlined in the Site Allocations DPD is to create a collection of thriving creative quarters, providing jobs for the local economy, cultural output that can be enjoyed by local residents, and places for local artists to live and work. The SA DPD notes that changes from existing employment use will need to be accompanied by detailed management arrangements that secure long term access to affordable business premises.

Applicant land/property holdings

3.1.15 The applicant, Provewell Ltd, have owned sites across the Warehouse District since the 1990s and they have stated that they are seeking to encourage and incubate the creative community to remain in the area. Their land holdings are shown in Figure 6 below (the sites edged in red – Arena and Overbury/Eade Road).

Figure 6 – *Provewell ownership across the Warehouse District (red edged areas)*

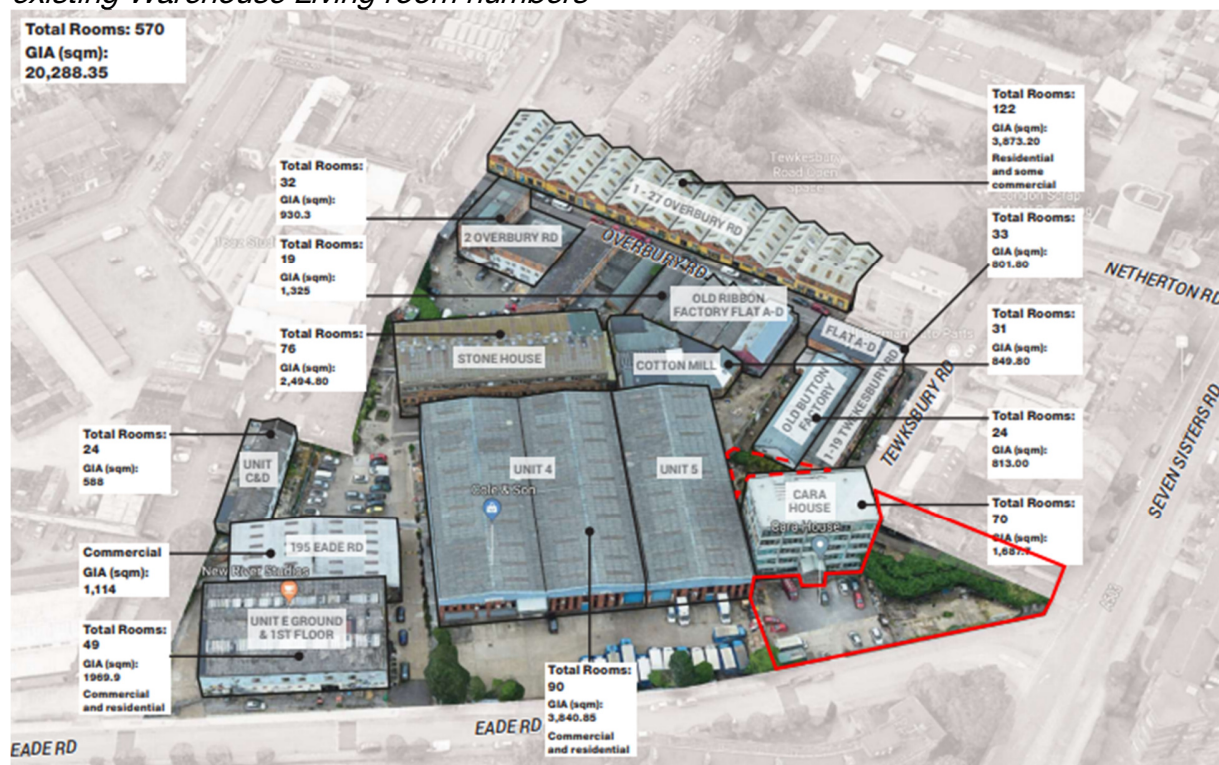


Warehouse living accommodation across the site allocation

3.1.16 Whilst there are several commercial/industrial/storage businesses operating out of buildings which are within the site allocation, there is also a sizable

Warehouse Living community, as indicated in the image below which gives estimates of room numbers. The applicant estimates that there are a total of 570 Warehouse Living rooms across the site allocation (SA34) which includes a total of 70 in Cara House.

Figure 7 – Image showing the existing buildings in the Site Allocation and approximate existing Warehouse Living room numbers



3.1.17 In terms of use: Unit 1 and Unit 2 Overbury Road, part of Unit E, part of Unit 4 and 195 Eade Road are in commercial use. All other units are in residential (Class C3) / HMO (sui generis) use. The residential/HMO units support a total of approximately 570 rooms of accommodation, in units of between 3 and 15 people.

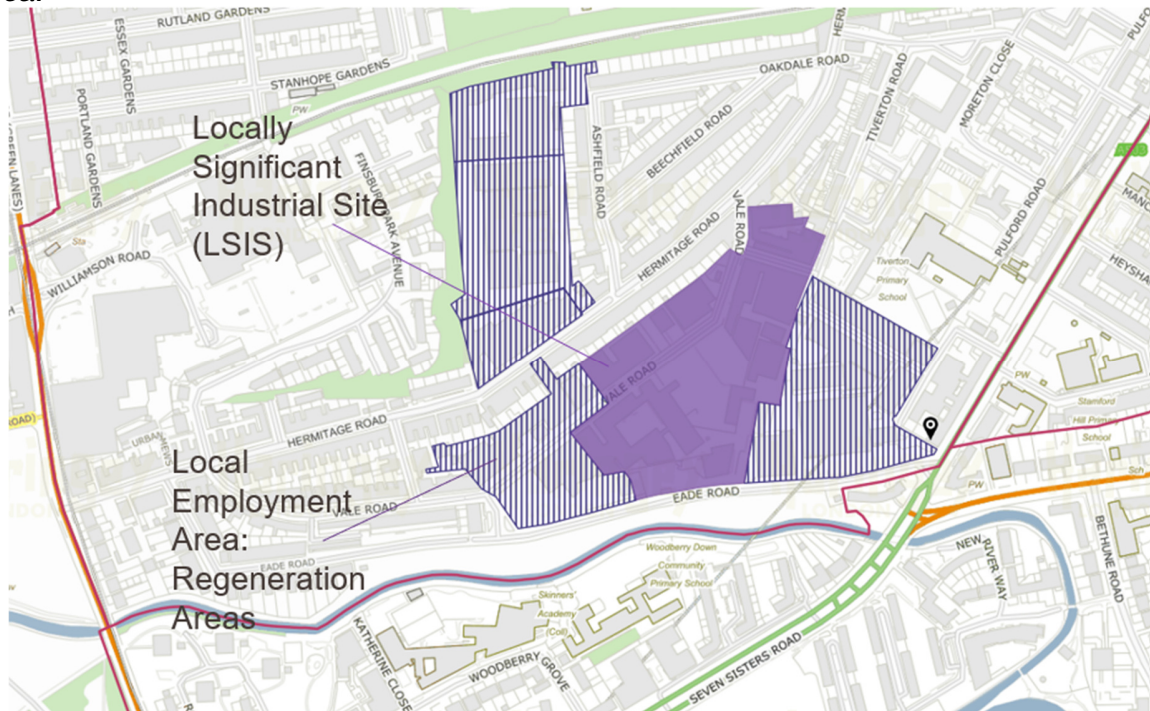
Wider Area

3.1.18 The land to the rear of 341 & 343 Seven Sisters Road is currently used for storage and what appears to be 'car breaking'. Beyond the site allocation to the west is the Vale Road/Tewkesbury Road Locally Significant Industrial Site (LSIS) which includes the locally listed Former Maynard's Sweet Factory and Florentia Clothing village made up of predominantly low-rise light industrial buildings and office floorspace.

3.1.19 The LSIS which contains the locally listed Former Maynard's Sweet Factory sits at the centre of the District with the Local Employment Area: Regeneration Areas

surrounding the LSIS to the west, north, and east. These are all employment designations. The location of these are shown below.

Figure 8 – Image showing the location of the different employment designations in the area.



3.1.20 The site falls within the Seven Sisters Corridor Area of Change, which has potential for new housing and social infrastructure including, where appropriate and viable, the provision of new green space and community facilities. The site is also within the Tottenham Creative Enterprise Zone (CEZ).

3.1.21 The site does not fall within a Tall Building Growth Area. The Council has adopted the definition of Tall and Large Buildings as those which are substantially taller than their neighbours, have a significant impact on the skyline, are of 10 storeys and over or are otherwise larger than the threshold sizes set for referral to the Mayor of London.

3.1.22 The London Plan defines a tall building as one of 6 storeys or 18 metres measured from ground to the floor level of the uppermost storey.

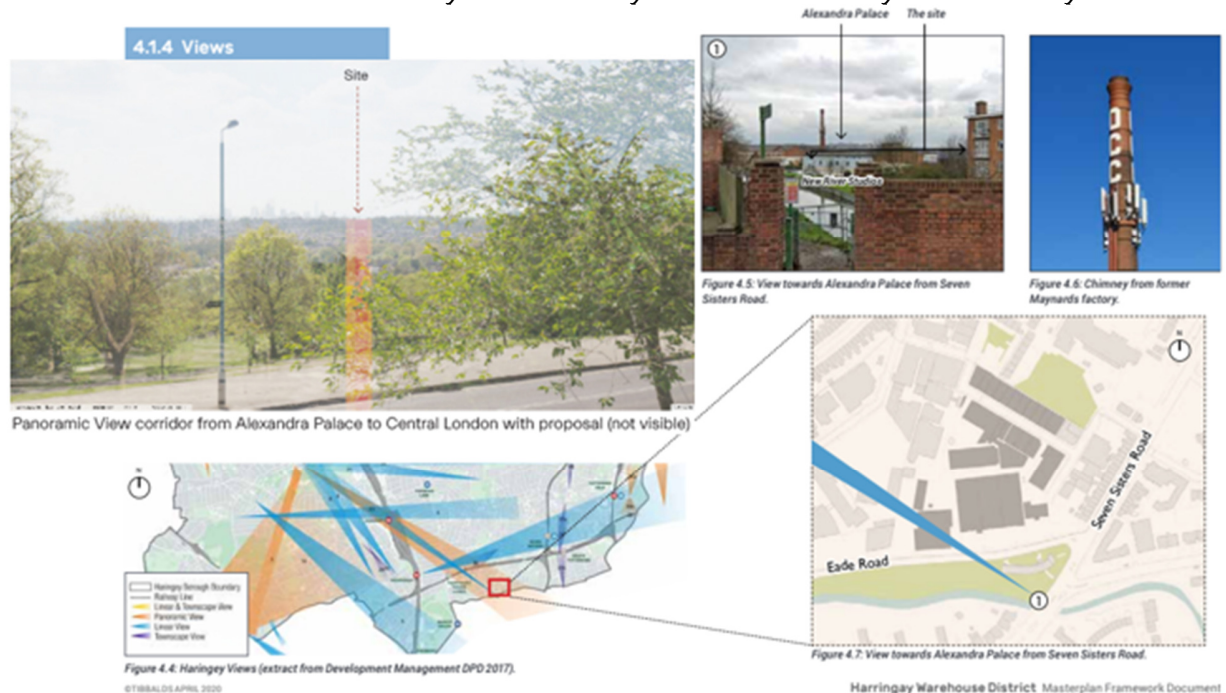
3.1.23 To the east and south of the site lies the borough boundary of the London Boroughs of Haringey and Hackney. To the southwest is the New River which is owned by Thames Water and is a Site of Importance of Nature Conservation (SINC) of Metropolitan Importance, an ecological corridor, a Conservation Area, and part of the Green Chain and Blue Ribbon. Woodberry Down Baptist Church

is a locally listed building located nearby, albeit to the northeast of the site down the sloped Seven Sisters Road within Seven Sisters Ward.

3.1.24 Vivian House, an existing four-storey residential block sits opposite the site to the south and Amhurst Court, another four-storey residential block sits to the south-east. To the north, the Old Button Factory fronts onto the western side of Tewkesbury Road and comprises Warehouse Living accommodation and a series of existing breakers yards / car mechanic businesses occupy land fronting onto the eastern side of Tewkesbury Road.

3.1.25 The site sits within a strategic Panoramic View corridor that runs from Alexandra Palace to Central London (City and St Pauls Cathedral). This view corridor extends from the corner of Seven Sisters Road, Amhurst Park and Eade Road towards Alexandra Palace. The location of this corridor is shown in more detail in Figure 9 below along with the Panoramic View from Alexandra Palace. Given the location of the site within the site allocations the proposed buildings would not have an impact on the Linear View.

Figure 9– Images showing the Panoramic view from Alexandra Palace and the Linear View from Seven Sisters Road towards Alexandra Palace as well as features within these views such as the chimney of the locally listed former Maynards factory.



3.2. Proposed development

- 3.2.1 Planning permission is sought for a mixed-use development comprising new 'Warehouse Living' accommodation (Sui Generis) and other mixed commercial spaces (Class E). The description of development is as follows:

Construction of two new buildings to provide new warehouse living accommodation (Sui Generis (warehouse living)), ground floor café/ workspace (Use Class E) and associated waste collection and cycle parking. Erection of 10 stacked shipping containers (two storeys) to provide workspace/ artist studios (Use Class E), toilet facilities and associated waste collection and cycle parking. Landscape and public realm enhancements including the widening of and works to an existing alleyway that connects Seven Sisters and Tewkesbury Road, works to Tewkesbury Road, the creation of rain gardens, greening, seating, signage and artworks and all other associated infrastructure works, including the removal of an existing and the construction of a new substation to service the new development.

- 3.2.2 As set out above Warehouse living is a specific type of use that has emerged over time in certain employment locations within Haringey and lends particular support to creative industries. It does not fall within a specific use class – and is not live/work development – and as such is considered a Sui Generis use; so does not fit within any established use class.

- 3.2.3 The applicant has explained Warehouse Living as follows:

All of the warehouses have a shared internal communal space, this space is used for cooking and socialising but is also used as workspace. It is flexible and open to residents interpretation. The physical spaces are interwoven with one another, reflecting the blurred lines that exist between living and working within their communal areas depending on the needs of the residents. This community choose to live in the warehouses because of the opportunities it provides to pursue creative and collaborative activities. The spaces the warehouse support are, by their nature, sufficiently flexible, such that they can absorb the demands placed upon it. The District's success is based on the collaborative and entrepreneurial nature of the people who live there, which has tied the community together and organically developed the character of the area.

- 3.2.4 This is the first proposal for new build Warehouse living and follow the preparation of a masterplan for this site allocation which also provides standards for new Warehouse living development including space standards for rooms and the level of shared amenity space provided based on an analysis of existing Warehouse Living arrangements.

- 3.2.5 The proposed development would deliver two new buildings to the Eade Road frontage. The first would be a 4-storey building to the front of Cara House and Cara Yard (Block B) with the second taller (8/10-storey) of the two buildings

(Block A) located on the corner of Seven Sisters and Eade Roads. Two storeys of Block A would be sited below the Seven Sisters ground level due to the topography of the site that drops northwards into Tewksbury Road.

3.2.6 See Figure 11 showing a view of the proposed new buildings to Eade Road. The ground floor (to Seven Sisters Road) of these buildings would include commercial/ancillary spaces with Warehouse Living above.

3.2.7 The scheme would also incorporate the installation of 10 shipping containers to be used for flexible commercial use as well as the erection of other ancillary buildings (such as a refuse store and relocated electricity substation) to the south of Tewksbury Road and to the rear of 341 & 343 Seven Sisters Road. This area would be named Tewksbury Yard. Figure 10 shows the massing of the proposed built form from the north and south in 3D.

3.2.8 13 new Warehouse Living (WHL) units would be delivered as follows:

Block A

- 3 x 14 bed units, 1 x 12 bed unit, 5 x 5 bed units, & 1 x 4 bed unit; and
- 2 Workshop units located in below ground levels for creative working.

Block B

- 3 x 6 bed units.

3.2.9 A total of 101-bedroom spaces are provided across the development, 68.3% (69) of which are single, 20.8% (21) are double and 10.9% (11) of all bedrooms across the site are accessible. Figure 12 shows a cut through of the buildings – indicating the 13 units and number of bedspaces in each.

Figure 10 – 3D image showing the proposals (blue) in their context looking north from above *Seven Sisters Road*, then looking south from above *Overbury Road*

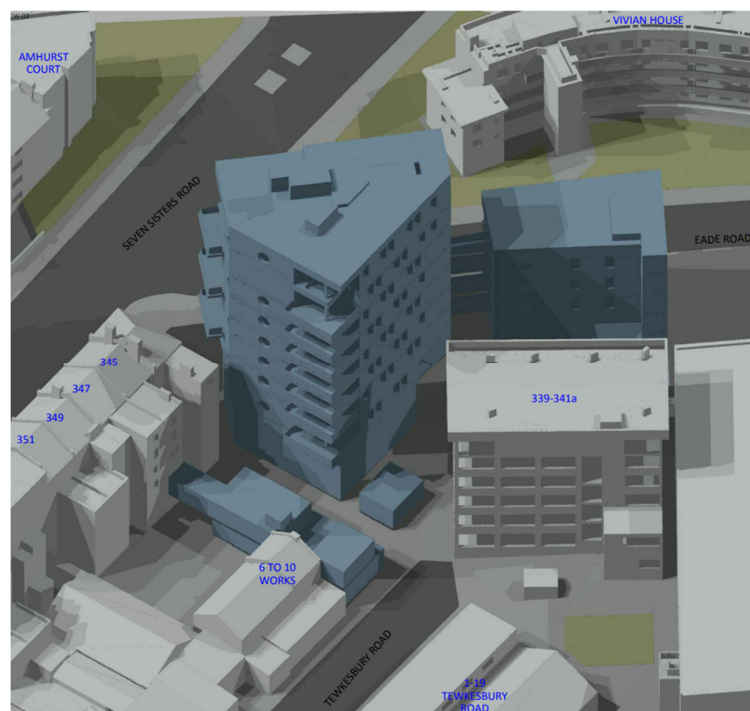
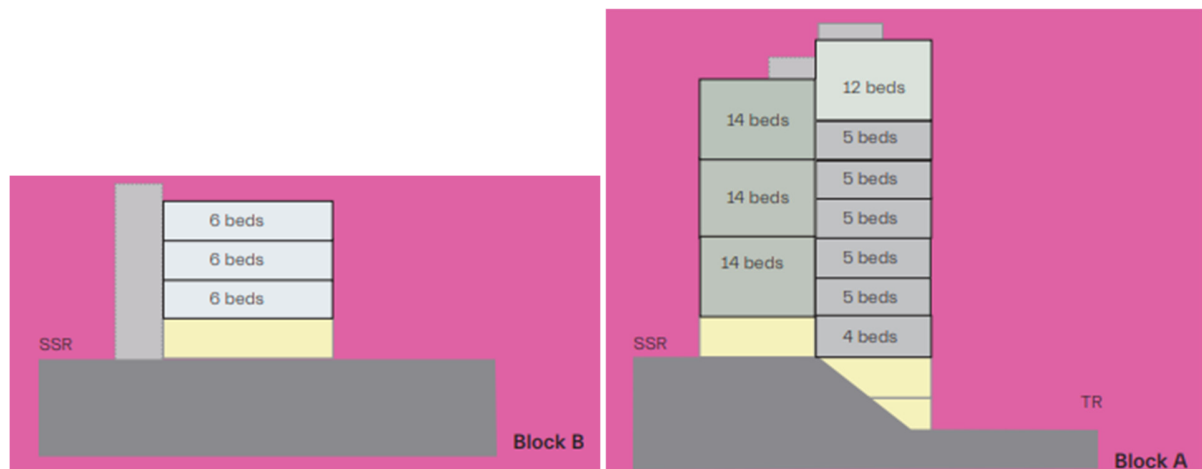


Figure 11 - View looking from *Seven Sisters Road*, looking west up *Eade Road*



Figure 12 – Section cut through looking east through *Block B* and west through *Block A* showing each WHL unit and bedspace numbers

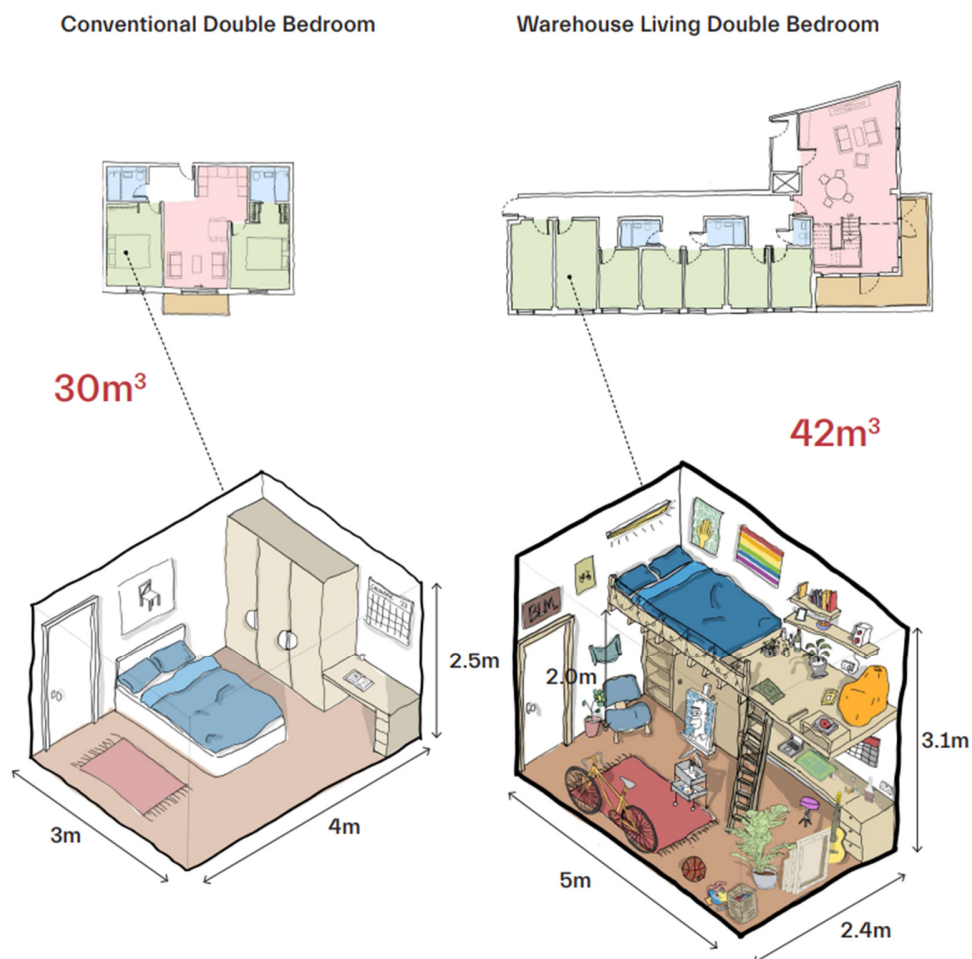


3.2.10 The proposed unit mix reflects the mix of units already in the Warehouse District (as identified in the applicant's Masterplan Framework) and provides the opportunity to support a variety of larger and smaller groups. The split of one and two bed units also reflects the position within the existing warehouses with most of the rooms being single and a smaller proportion being double occupancy.

3.2.11 The applicant has identified in their Masterplan Framework that one of the key features of Warehouse Living is double height bedroom space, which creates the opportunity to introduce a deck bed space with workspace / living space below. The proposals provide bedroom spaces with a 3.5m floor to ceiling height (3.1m with ceiling system), which creates the opportunity to insert bed decks, and increase the overall working / living space within each room.

3.2.12 A comparison of the proposed floor to ceiling heights with conventional room heights and volumes are shown in Figure 13 below

Figure 13 – *Comparison of conventional and proposed Warehouse Living room and volume sizes*



3.2.13 The 4, 5, and 6-bed units would be single storey with enhanced (3.1m internal) floor to ceiling heights. The larger 12 and 14-bed units would be set over two floors and would have a double height amenity space with a kitchen above a living/work space that opens onto an external terrace - as shown below in Figure 14.

Figure 14 – *Warehouse Living Floor Layouts*



3.2.14 The scheme would deliver the following floorspace across the new buildings:

Table 1 *Floorspace figures – Warehouse Living and Class E (Commercial)*

Use	Area sqm
Warehouse Living	4,070.5 sqm (GEA) / 3,580.7sqm (GIA)
Workshop units located in below ground levels of Block A	150sqm (GEA) / 110sqm (GIA)
Total	4,220.5sqm (GEA)
Commercial Use (Locations)	Area sqm (GEA)
Ground Floor	Block A = 136.8sqm and Block B = 38.2sqm
Tewksbury Yard	185.2sqm
Seven Sisters Terrace	137.4sqm
Total	497.6sqm (GEA)

3.2.15 The Warehouse Living would be made up of the following:

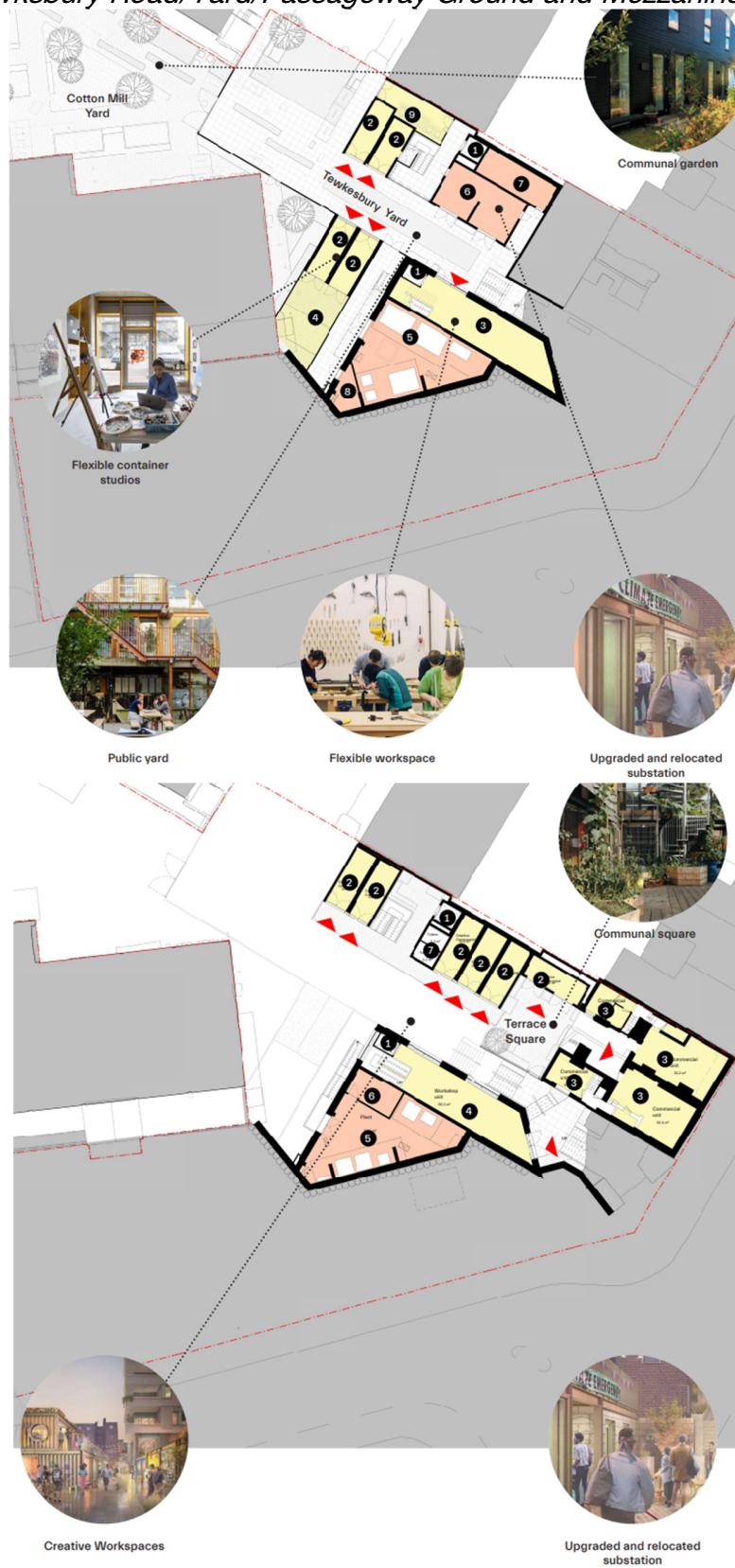
Table 2 *Warehouse Living floor by floor makeup – across the two buildings*

Floor	Bedrooms	Kitchen/Diners	Bathrooms
Ground	4	1	2
First	18	3	7
Second	18	3	7
Third	18	3	7
Fourth	12	2	5
Fifth	12	2	5
Sixth	13	2	5
Seventh	6	1	2
Total	101	17	40

3.2.16 The intention is for the commercial spaces to comprise workspace, artist studios, and café uses (Class E). The café use is likely to occupy the ground floor space in Block A, with the remaining floorspace coming forward within the lower ground/basement areas of 341 and 343 Seven Sisters and within the proposed 10 former shipping containers to be erected in Tewksbury Yard.

3.2.17 Due to the drop in land levels from south to north from Seven Sisters Road to Tewksbury Road, Building A would have two below ground levels that would have frontages onto Tewksbury Yard, the staircased passageway, and the containers, at the rear of the site as shown below in Figure 15.

Figure 15 – *Tewksbury Road/Yard/Passageway Ground and Mezzanine Plans*



3.2.18 The proposals include works to widen the existing public right of way (PROW) by extending the existing alleyway into the site. The widened stair would not be as steep as existing and would be accompanied by new lighting and landscaping. It would also have a wheeling ramp for bicycles.

3.2.19 The route would be activated by the windows and entrances of Block A and the containers. Figure 16 below shows the existing route and the area of proposed works:

Figure 16 – *Public realm works and pedestrian route widening*



3.2.20 The landscape proposals would deliver a key part of the site wide landscape and public realm strategy as set out in the Framework. The proposed public realm comprises an integrated network of pedestrian / cycle priority links, yards, and spaces, identified as follows and below in Figure 17:

- Cotton Mill Yard
 - To the rear (north) of Cara House to be used by residents of the area only
- Tewkesbury Yard and Seven Sisters open space and steps
 - An activated route allowing pedestrian access from Seven Sisters Road through to the rest of the District.
- Cara Yard
 - located between Cara House and the new buildings fronting Eade Road allowing refuse collection and service deliveries to the new buildings.

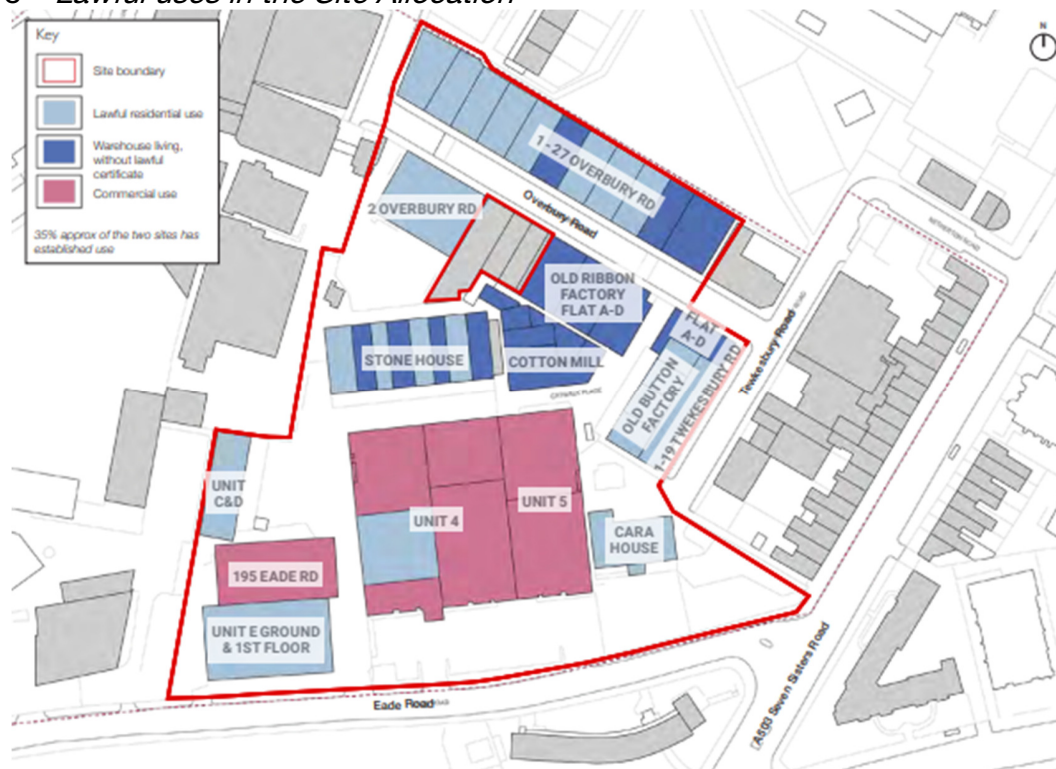
Figure 17 – *Ground Floor Location of public realm, yards, and spaces*



3.3. Relevant Planning and Enforcement history

- 3.3.1 The site itself has little planning history as it is largely made up of areas of hardstanding to the front and side of Cara House. The area to the side was previously used for car parking but has since been used for amenity purposes relating to Warehouse Living and most recently as a space for a fish and chip van.
- 3.3.2 The area to the front of Cara House continues to be used for car parking as well as storage. 341 and 343 Seven Sisters Road which fall within the red line have had several retail uses at ground floor level with flats above. The rear where these properties abut Tewksbury Road has been used for different types of storage.
- 3.3.3 The wider site has been subject to an extensive planning history. Most of the recent historic applications relate to applications for Certificates of Lawfulness in relation to establishing the use of the existing industrial/warehouse buildings for residential (Class C3) use. The lawfulness of existing uses of buildings in the site allocation are shown below:

Figure 18 – *Lawful uses in the Site Allocation*



- 3.3.4 The site allocation has 68 separate units. The current lawful use position on the site allocation is summarised as follows:
- Approximately 8,300 m² of lawful residential use,

- ii. Approximately 3,940 m² of lawful commercial space in commercial use,
 - iii. Approximately 6,132m² of additional residential accommodation (previously commercial floorspace) that is being occupied without Certificate of Lawfulness. However, the applicant asserts that the majority of this space has been in established residential use by the host community for 5-10+ years.
- 3.3.5 In summary, the overall site allocation has, either through a formal grant of planning permission or potentially through longevity, approximately 14,755 m² (78%) of residential floorspace and 3,940 m² (22%) of commercial floorspace.
- 3.3.6 There is no existing Warehouse living on this site which is largely vacant with traditional commercial and residential on part of the site.
- 3.3.7 All Warehouse Living units (i.e. non-commercial units) have HMO licences. The Council's HMO team worked with the Building Control team during the licencing process to provide recommendations for upgrading the spaces, all of which the applicant says have been implemented.
- 3.3.8 Two recent significant planning permissions of note are:

Application HGY/2022/0044, involving the redevelopment of part of the Florentia Clothing Village, located immediately adjacent to western boundary of the wider site, and the delivery of four buildings to provide approximately 9,363sqm of flexible light industrial use and storage (Class E) and distribution (Class B8).

Planning permission has recently been secured to erect 16 stacked shipping containers to provide workspace / artist studios on land to the rear of 2 Overbury Road (**HGY/2021/2891**) which has recently been constructed.

4.0 CONSULTATION RESPONSE

4.1. Planning Committee Pre-Application Briefing

- 4.1.1 The proposal was presented to the Planning Committee at a Pre-Application Briefing on 5th December 2022. The relevant minutes of the meeting have been included in the pack in Appendix 6.

4.2. Quality Review Panel (QRP)

- 4.2.1. The scheme was presented to Haringey's Quality Review Panel most recently on the 3rd May 2023 and prior to that on 14 December 2022 and 17 August 2022. The written findings of the panel can be found within Appendix 7.

4.3. Development Management Forum

- 4.3.1. The proposal was presented to a Development Management Forum on 08 December 2022.
- 4.3.2. Officer notes from the Forum are set out in Appendix 8.
- 4.3.3. It is noted that the applicant also carried out their own consultation with existing residents involving exhibitions, workshops, one-on-one meetings, and small group sessions. The findings of which are described in the Design and Access Statement (DAS) submitted in support of the application.

4.4. Application Consultation

- 4.4.1. The following were consulted on the scheme:

Internal Consultees

- LBH Building Control
- LBH Carbon Management
- LBH Conservation
- LBH Construction Logistics
- LBH Design Officer
- LBH Economic Regeneration
- LBH Employment and Skills
- LBH HMOs
- LBH Housing Strategy and Policy
- LBH Lead Local Flood Authority/Drainage
- LBH Nature Conservation
- LBH NHS Haringey
- LBH Noise
- LBH Policy
- LBH Pollution
- LBH Private Sector Housing Team
- LBH Street Lighting
- LBH Transportation
- LBH Trees - Arboricultural Officer
- LBH Waste and Street Cleansing

External Consultees

- Arriva London
- Environment Agency
- Greater London Authority (GLA) / Mayor for London

- Greater London Archaeology Advisory Service (GLAAS)
- Health & Safety Executive – Planning Gateway One (Building Safety Regulator)
- LB Hackney
- London Fire Brigade
- London Underground/DLR Infrastructure Protection
- Mayor's Office for Policing and Crime
- Metropolitan Police - Designing Out Crime Officer
- Natural England
- National Grid Asset Protection Team
- New River Action Group
- NHS London Healthy Urban Development Unit
- Thames Water
- Transport for London
- UK Power Networks (Electricity)

The following summarised responses were received:

Internal:

1) LBH Carbon Management

Conditions and s106 heads of terms recommended.

2) LBH Conservation

Overall, the proposed development would have a neutral impact on the significance of the designated heritage assets, and the majority of the non-designated heritage assets, for which the site forms part of their setting. However, it is considered that there would be some harm to the significance of Woodberry Down Baptist Church as it would diminish the prominence and part of the landmark quality of the locally listed building.

3) LBH Design Officer

This ambitious proposal could be a revolutionary contribution to providing affordable, effective and vibrant living and working condition as, and help make the Warehouse District a more vibrant and exciting destination, more visible and more able to show itself off and sell its wares. The proposals are nevertheless designed in a rigorous, coherent, logical and hard-edged manner appropriate for a gritty, hard-working location and needs for solidity and durability, softened by moments of joy, greenery and artistic creativity.

4) LBH Housing Strategy and Policy

Considering the policy commitments relating to the Warehouse District and of the relatively small size of the surplus, we accept that using the

entire surplus for affordable workspace is a reasonable decision in policy terms.

5) LBH Lead Local Flood Authority (LLFA)/Drainage

We are generally content with the overall methodology as used and mentioned within the submitted report, subject to planning conditions regarding the Surface Water Drainage Strategy and its Management and Maintenance Plan.

6) LBH Pollution (Carbon Management)

No objection subject to recommended conditions.

7) LBH Private Sector Housing Team

Houses in multiple occupation should include bedrooms sized at 10sqm for a single room and 15sqm for a double room. There should be no more than 5 people to one bathroom and 3 rooms to one kitchen.

A platform bedspace/bed deck/mezzanine would increase the floorspace available in each unit. In many HMOs the bedroom is the only space the tenant has as there may be no communal areas so the 10sqm single room/15sqm double room floor space allows for this.

8) LBH Transportation

Following satisfactory resolution of points raised by Officers, no objection subject to conditions and s106 heads of terms.

9) LBH Trees - Arboricultural Officer

No objections.

10) LBH Waste and Street Cleansing

The calculation that has been applied to the bin numbers and waste streams seems proportionate, given that there are only bedrooms rather than property numbers, so I agree with the quantities allocated based on the applied rationale.

External:

11) Environment Agency (EA)

Based on a review of the submitted information, we have no objection to the proposed development.

12) Greater London Authority (GLA) / Mayor for London - 19/06/2023

The application does not yet fully comply with the London Plan. However, possible remedies set out in this report could address these deficiencies.

13) Greater London Archaeology Advisory Service (GLAAS)

In view of the scale of the impacts and the likely impacts of past quarrying and landfill, I do not advise archaeological investigation in relation to this scheme. No further assessment or conditions are therefore necessary.

14) Health & Safety Executive – Planning Gateway One

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.

15) London Underground/DLR Infrastructure Protection

No objection in principle. However, due to closeness to London Underground railway infrastructure, any grant of planning permission should be subject to requested conditions.

16) Metropolitan Police - Designing Out Crime Officer (DOCO)

Should planning consent be granted for this application, we would request Secured by Design (SbD) conditions and an informative are attached to the final Decision Notice.

17) Natural England

Based on the plans submitted, Natural England considers that the proposed development will not have significant adverse impacts on designated sites and has no objection.

18) NHS London Healthy Urban Development Unit

The request is the Council to secure £65,761 within the S106 agreement to be paid on commencement and indexed linked to building costs.

19) Thames Water

Thames Water advise that with regard to Wastewater Network and Sewage Treatment Works infrastructure capacity, we would not have any objection to the above planning application, based on the information provided. Piling and Water Main Conditions and Groundwater Risk Management Permit informative recommended.

20) Transport for London

Welcome public realm improvements, which should be secured in the s106 and delivered via a s278 agreement. Contributions should be sought towards improving links to Cycleway 1, improved pedestrian and cyclist crossing of Seven Sisters Road, and improving pedestrian routes to Stamford Hill and Manor House (including the Eade Road crossing).

The London Plan minimums should be provided for cycle parking in accordance with the London Cycle Design Standards (LCDS). Further detail should be provided on the management of the servicing bays, and

loading. A Full Travel Plan should be secured and monitored through the section 106 agreement. Construction Logistics Plan (CLP) and London Underground infrastructure conditions are recommended.

5.0 LOCAL REPRESENTATIONS

5.1 The following were consulted on the application:

- 377 Neighbouring properties consulted by way of letter.
- 6 site notices were erected close to the site.

5.2 The number of representations received from neighbours, local groups etc in response to notification and publicity of the application were as follows:

No of individual responses:

- Objecting: 29
- Supporting: 0
- Comments: 0

5.3 The key issues raised in these representations are summarised as follows (A more detailed summary of the representations and Officer responses can be found in Appendix 3: Neighbour representations:

- Loss of Light.
- Loss of Parking/Loading/Turning.
- Loss of Privacy.
- Removal of road access.
- Disabled access to Cara House obstructed.
- Loss of Trees.
- The design does not align with the aesthetic of the surrounding area in terms of materials and architecture.
- The magnitude of visual change would impact the residents of the area.
- No Affordable Housing contribution or further s106 financial contributions due to the viability position.

6.0 MATERIAL PLANNING CONSIDERATIONS

6.1 The main planning issues raised by the revisions are:

1. Principle of the development including Policy Assessment (6.2)
2. Viability & affordability (6.3)
3. Impact on the amenity of adjoining occupiers (6.4)
4. Design (6.5)
5. Impact on heritage assets including affected conservation areas (6.6)

6. Quality of Accommodation (6.7)
7. Social and Community Infrastructure (6.8)
8. Transportation, parking, and highway safety (6.9)
9. Air Quality (6.10)
10. Energy, Climate Change and Sustainability (6.11)
11. Urban Greening and Ecology (6.12)
12. Trees and Landscaping (6.13)
13. Wind and Microclimate (6.14)
14. Flood Risk and Drainage (6.15)
15. Waste and Recycling (6.16)
16. Land Contamination (6.17)
17. Below Ground Development (6.18)
18. Archaeology (6.19)
19. Fire Safety and Security (6.20)
20. Equalities (6.21)
21. Conclusion (6.22)

6.2 Principle of the development

Policy Background

- 6.2.1 The current National Planning Policy Framework NPPF was updated on 19 December 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.

The Development Plan

- 6.2.2 For the purposes of S38(6) of the Planning and Compulsory Purchase Act 2004 the Local Plan comprises Haringey’s Local Plan Strategic Policies (SP), the Development Management DPD (DMDPD) and the Site Allocations DPD (SA DPD), and the London Plan (2021).
- 6.2.3 These plans and strategies set the context for development in the area. The application site is located within strategically allocated sites – SA34 (Overbury & Eade Rds) and SA35 (L/B Seven Sisters & Tewkesbury Rds).
- 6.2.4 The Council is preparing a new Local Plan and consultation on a Regulation 18 New Local Plan First Steps document took place between 16 November 2020 and 1 March 2021. The First Steps document sets out the key issues to be addressed by the New Local Plan, asks open question about the issues and challenges facing the future planning of the borough and seeks views on options to address them.

- 6.2.5 The Council will publish a consultation report for the First Steps Engagement alongside a Draft Local Plan for further consultation – expected in summer 2024. Currently it has very limited material weight in the determination of planning applications.

The London Plan

- 6.2.6 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 several 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 direction.

The Local Plan

- 6.2.7 Haringey's Local Plan Strategic Policies set 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) give effect to the spatial strategy by allocating sufficient sites to accommodate development needs.
- 6.2.8 The site is located within the Seven Sisters Corridor Area of Change as per Haringey's Spatial Strategy Policy SP1. The Spatial Strategy makes clear that 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 and promote development in Areas of Change.
- 6.2.9 The Development Management DPD (DMDPD) gives effect to Haringey's spatial strategy and the key objectives of the Strategic Policies Local Plan by supporting proposals that contribute to the delivery of sustainable development in accordance with the strategy, the Development Management DPD sets out criteria-based policies against which planning applications will be assessed.

Site Allocations Development Plan Document (SA DPD)

- 6.2.10 The Site Allocations Development Plan Document gives effect to the spatial strategy by allocating sufficient sites to accommodate the development needs of those parts of the borough outside the growth area of Tottenham.
- 6.2.11 The SA DPD identifies that the employment function of the Harringay Warehouse District (HWD) area needs to be retained. Both commercial floorspace and jobs should be increased through any proposal or set of proposals.

6.2.12 The SA DPD identifies that it will be important for any new development to be able to demonstrate how it would retain / safeguard the existing community which exhibits significant clusters of skills / businesses with a focus on the arts / creative sectors.

6.2.13 The vision for the area outlined in the Site Allocations DPD is to create a collection of thriving creative quarters, providing jobs for the local economy, cultural output that can be enjoyed by local residents, and places for local artists to live and work. The SA DPD notes that changes from existing employment use will need to be accompanied by detailed management arrangements that secure long term access to affordable business premises.

Allocated sites SA34 (Overbury & Eade Rds) & SA35 (L/B Seven Sisters & Tewkesbury Rds)

6.2.14 The application site falls within site allocations SA34 and SA35 – Overbury & Eade Roads (SA34) and Land behind Seven Sisters & Tewkesbury Roads (SA35) as noted in the Site Allocations DPD.

6.2.15 SA34 is allocated for a potential development to increase accessibility, providing increased mixed use floorspace including Warehouse Living accommodation. SA35 is allocated for the redevelopment of existing buildings to create a higher quality streetscape on Tewkesbury Road, to complement the Harringay Warehouse neighbourhood.

6.2.16 SA34 encourages a comprehensive approach to site management and managed enhancement of the employment and residential offer, including improved permeability in line with Policy DM55 of the DMDPD: Regeneration / Masterplanning.

6.2.17 The allocation (SA34) states that the Council will work with landowners and residents to find ways to reintroduce employment, while continuing to meet the accommodation needs of the existing creative community. A new street layout that improves accessibility through the site will also be considered.

6.2.18 A summary list of both the SA34 & SA35 site requirements are as follows:

- A site-wide management plan masterplan in accordance with Policy DM39;
- The potential for a building on the corner of Eade and Seven Sisters Roads, marking the gateway to the warehouse district;
- Reintroduction of employment-generating uses;
- Local Employment Area: Regeneration Area status;
- The principles of policy DM39: Warehouse Living apply, and the site is subject to the requirements of Policy DM38: Employment-Led Regeneration;
- Pedestrian permeability encouraged;

- Affordable commercial rents will be expected in line with Policies DM38 and DM39;
- If necessary, cross subsidy of employment floorspace from residential development will be considered;
- Maximum amount of employment floorspace must be provided subject to viability;
- Appropriate development = employment-led mixed-use development;
- The terrace fronting Seven Sisters Rd should be retained with ground/first floor commercial uses with residential above; and
- Access from the Overbury Road area to and across Seven Sisters Road should be improved.

6.2.19 The development guidelines for both the SA34 & SA35 are as follows:

- Development needs to create active frontages to ensure passive surveillance.
- The creation of a limited destination might be considered acceptable, as part of a central space. This could take the form of a weekend 'Makers' Market'.
- Planning obligations to open up the south bank of the New River and institute a linear park should be explored through this development.
- Buildings in the area should continue to be designed to maintain the unique warehouse character of the area.
- Developments that continue to support the principles of communal living will be supported.
- Thames Water should be consulted with regards the capacity of existing drains to move wastewater from SA34 and SA35. Provision for safe and secure wastewater drainage will be required to be identified prior to development commencing, and this will be a condition on planning consents.
- Further masterplanning may be desirable to help create a co-ordinated scheme for SA34 and the adjoining areas. This could include an SPD.
- SA34 and SA35 is identified as being in an area with potential for being part of a decentralised energy network. Proposals should reference the Council's latest decentralised energy masterplan regarding how to connect, and the SA34 & SA35's potential role in delivering a network within the local area.
- Studies should be undertaken to understand what potential contamination there is on SA34 prior to any development taking place.
- A piling statement will be required prior to any piling taking place.
- Applicants must consult with Thames Water regarding both wastewater and water supply capacity upon the preparation of a planning application.
- SA34 and SA35 is in a groundwater Source Protection Zone and therefore any development should consider this receptor in any studies undertaken. Studies should be undertaken to understand what potential contamination

there is on SA34 and SA35 prior to any development taking place and where appropriate, a risk management and remediation strategy.

- A flood risk assessment is required for any development. Council's Strategic Flood Risk Assessment further outlines when an assessment is required and what it should include.
- Buildings with SA35 will continue to present active frontages onto Seven Sisters Rd, but servicing should be accessed from Overbury and Tewkesbury Rds.
- In line with policy SP9, if redevelopment of SA35 results in a net loss of employment floorspace, a financial contribution may be required as set out in the Planning Obligations SPD.
- An improved connection between the Harringay Warehouse District and Seven Sisters/Amhurst Rds through SA35 is required.

6.2.20 The allocation (SA34) states that the Council will work with landowners and residents to find ways to reintroduce employment, while continuing to meet the accommodation needs of the existing creative community. A new street layout that improves accessibility through the site will also be considered.

6.2.21 Other development plan designations include:

- Local Employment Area: Regeneration Area
- Lies within viewpoints 1 (the strategically important view of Central London from Alexandra Palace) and view 23 (the locally important view of Alexandra Palace from the corner of Seven Sisters Road, Amhurst Park and Eade Road).
- Maynards Sweet Factory & Woodberry Down Baptist Church (locally listed buildings) are located near to the site.
- Critical Drainage Area (CDA)

Policy Assessment

Masterplanning

6.2.22 Policy DM55 of the DMDPD 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".

6.2.23 Part D of policy DM39: Warehouse Living of the DMDPD requires a masterplan to be prepared which has regard to individual site circumstances and the following matters:

- a. The access arrangements, physical condition and layout of the existing buildings and accommodation on the site;
- b. The lawful planning uses on site, establishing the existing baseline with respect to the intensification of the employment offer and re-provision of the host community;
- c. The host community's existing and future accommodation needs for creative living and working;
- d. The quantum of commercial floorspace to be retained, re-provided, increased, and the resulting increase in employment density to be achieved having regard to the baseline at (b);
- e. The size and type of both the workplace space and residential accommodation to be provided, having regard to:
 - i. the needs of SMEs for smaller unit sizes (<100sqm);
 - ii. provision for communal workspace, both internal and external;
 - iii. the need for low-cost workspace and affordable residential accommodation to support and grow the existing start up and creative industry sectors.
- f. The interface with, and potential impact on, neighbouring uses;
- g. The internal layout of uses and therein, the potential to optimise the positive inter-relationships and avoid, where practicable, negative impacts;
- h. Having regard to (e – g) above, the building specifications and amenity standards to be achieved for both the workshop space and the residential accommodation;
- i. The specific site requirements as identified in the individual site allocations;
- j. Controls over the management and operation of the Warehouse Living spaces, in particular, the means by which to ensure that the use of the site continues to promote the genuine inter-relationship of the living and working elements;
- k. Servicing and parking requirements; and
- l. Viability, including requirements for cross-subsidy from other uses including private residential development (market sale/PRS etc).

6.2.24 Policy DM39 states that the Council will support proposals for Warehouse Living that form part of an agreed masterplan to increase and diversify the employment offer of these employment areas whilst providing an appropriate standard of living for the integrated residential element.

6.2.25 The applicant has submitted a Masterplan Framework Document alongside the application for the Harringay Warehouse District SA34: Overbury and Eade Road. The Masterplan Framework is based on a detailed analysis of the unique Warehouse Living typology and seeks to provide a holistic approach to incremental development in this site allocation.

6.2.26 The Masterplan Framework looks at broad ambitions such as key routes and links within the site allocation but also detailed issues such as quality of

accommodation. The Masterplan Framework is a comprehensive document that addresses all of the criteria sited under part D of DM39.

- 6.2.27 The Masterplan Framework provides a detailed description of existing access arrangements, physical conditions, and layout and in so doing confirms the existing problems, issues, and opportunities on the site, which have helped inform the component parts of the Framework.
- 6.2.28 The Framework confirms the baseline position in terms of number of units, quantum of development, and land use mix (quantum of floorspace in lawful residential use, lawful commercial use, and Warehouse Living / residential)
- 6.2.29 The Framework identifies the lawful planning uses across the Masterplan area and describes how all of the existing commercial spaces would be retained. 195 Eade Road is highlighted as a potential site for future redevelopment, but it is shown in the document that it would be retained as commercial space.
- 6.2.30 The existing 3,940sqm commercial floorspace across the site allocation would be retained or re-provided. It would be increased through temporary installations or new build development and/or conversions. The delivery of the Overbury Road containers delivers an additional 229sqm of commercial (Class E) studio space.
- 6.2.31 The resulting increase in employment density to be achieved has not been specifically identified. The Framework seeks to be a 'living document' that shows how commercial floorspace would be retained and/or increased but also identifies how the applicant will seek to implant a thread of commercial and workspaces throughout the site in the short to medium term.
- 6.2.32 The Framework identifies how the commercial and workspaces would provide a more public face to the area, allowing creatives to sell their products/artwork, as well as accommodating events for the public. These events and spaces could be for temporary use to enliven or invigorate different areas, but they will provide a vital connection between the Warehouse District and the surrounding areas.
- 6.2.33 The majority of the site is currently vacant or used for ancillary activities associated with existing buildings and their uses. As such, the proposal would retain and increase commercial space whilst delivering Warehouse Living accommodation that lends support to the creative industries sector. Therefore, the scheme would result in an increase in employment density.
- 6.2.34 The Framework provides guidance as to where new commercial space is anticipated to be delivered, the nature of this floorspace and the basis upon which this floorspace will be made available to users.

- 6.2.35 The Framework establishes a set of performance criteria for new Warehouse Living in terms of noise attenuation and requires all new development proposals to have regard to sunlight / daylight, overlooking distances, and overshadowing and to comply with recognised planning and other guidance.
- 6.2.36 The Framework sets a series of criteria for future Warehouse Living, which seeks to reflect the qualities of the existing living / working environments and overcome the weaknesses in terms of access to daylight, insulation, noise attenuation, storage, refuse arrangements, and bike storage.
- 6.2.37 The Framework establishes a set of minimum technical design, amenity, energy, and sustainability standards / requirements to be achieved by any new build/ refurbishment proposals brought forward. It establishes a set of baseline 'minimum' standards for all new and refurbished Warehouse Living developments.
- 6.2.38 These standards have been derived from a review of Haringey's HMO standards, London Plan housing standards, GLA guidance for large scale purpose-built shared living and from a review of existing Warehouse Living on the wider sites.
- 6.2.39 The comprehensive nature of the Masterplan Framework means that it addresses all relevant aspects of Part D of policy DM39 and puts forward the baseline principles for development whilst also providing the flexibility for evolution and change over time.
- 6.2.40 The Framework is intended to be a 'living' document that will be updated as developments/ works are brought forward and can be amended in response to the lessons learnt from the operation of the various new buildings and works.

Principle of Provision of Warehouse Living Accommodation

- 6.2.41 Part A of DMDPD policy DM39 states that Warehouse Living is a specific type of land use that has emerged over time in certain employment locations within Haringey and lends particular support to the creative industries sector. It does not fall within a specific use class – and is not live/work development – and as such is considered a Sui Generis use.
- 6.2.42 Part B of DMDPD policy DM39 identifies that the Council has made provision for proposals for Warehouse Living in Local Employment Area – Regeneration Areas, within the Harringay Warehouse District as defined in the Site Allocations DPD.
- 6.2.43 Part C of DMDPD policy DM39 states that the Council will support proposals for Warehouse Living that form part of an agreed masterplan to increase and

diversify the employment offer of these employment areas whilst providing an appropriate standard of living for the integrated residential element.

- 6.2.44 The site falls within a Local Employment Area – Regeneration Area, within the Harringay Warehouse District and site allocation (SA34) supports Warehouse Living that complies with policies DM38 and 39. Therefore, the principle of a new purpose-built Warehouse Living scheme is acceptable and supported in this location by the Development Plan.
- 6.2.45 Following the publication of the London Plan in March 2021 the Council's annual housing target increased to 1,592 homes.
- 6.2.46 Policy SP2 states that the Council will maximise the supply of additional housing to meet and exceed its minimum strategic housing requirement.
- 6.2.47 Given the above, the principle of the provision of new homes on the site (alongside a mix of other uses) is acceptable. Whilst Warehouse Living does not fall under Use Class C3 (Dwellinghouses) it still contributes towards the supply of housing.
- 6.2.48 Officers consider the most relevant measure for identifying the contribution to housing targets is the Purpose Built Student Accommodation (PBSA) ratio in the London Plan due to similarities in terms of floorspace sizes. 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.
- 6.2.49 The 101 bedspaces proposed would equate to 40.4 homes using that ratio. The proposals would therefore result in a net gain of 40 homes and make a welcome contribution towards delivering the borough's overall 10-year housing target.

Requirements and guidelines of the site allocations

- 6.2.50 As noted above the submission is accompanied by a site-wide management plan masterplan in accordance with Policy DM39 as required by the site allocation. The application also seeks to fulfil the requirements of SA34 by proposing a gateway building on the corner of Eade and Seven Sisters Roads.
- 6.2.51 The proposal has been supported by a Masterplan Framework that identifies how employment floorspace would be increased and diversified.
- 6.2.52 Employment-generating uses are proposed in the form of two small commercial units and one larger one within the new buildings along Eade Road and further commercial units within 10 former shipping containers stacked and arranged to front onto the alleyway and Tewkesbury Road. This is in addition to the 101 new

rooms and associated spaces of Warehouse Living accommodation which will accommodate employment activities too.

- 6.2.53 A key tenet of the proposals is the improvement of pedestrian permeability through a new improved stair route from Seven Sisters/Eade Roads to Tewksbury Road. The proposals also seek to improve the communal yard spaces and public realm surrounding the proposed and existing buildings.
- 6.2.54 Aspects relating to affordability are addressed in more detail under *Viability* below. The proposal provides affordable workspace and workspace exclusively for occupiers of the Warehouse Living. The Warehouse Living itself offers spaces that have attributes which support those who work in the creative industries sector. The viability of the project has limited the scope for affordable commercial rents.
- 6.2.55 The project would not be cross-subsidised by private housing and would be a Warehouse Living led mixed use scheme. The scheme would provide the maximum amount of employment floorspace subject to viability and would be employment led given the categorisation of Warehouse Living as an employment function. There would be no net loss of employment floorspace.
- 6.2.56 The proposals would retain the terrace fronting Seven Sisters Rd as well as ground/first floor commercial uses with residential above; and through the improved staircased route, access from the Overbury Road area to and across Seven Sisters Road would be improved.
- 6.2.57 The proposals include the creation of active frontages to the front and rear of the new Eade Road buildings and along the new staircased pedestrian route with windows to the flank of the taller Warehouse Living building and from the proposed commercial containers which ensure passive surveillance.
- 6.2.58 The proposed buildings have been designed to maintain the unique warehouse character of the area. This is discussed more in the *Design* section below. The layout has been designed to support the principles of communal living insofar as the site constraints have allowed. The internal design and layout follows the parameters set out in the Masterplan Framework and is addressed in the *Quality of Accommodation* section below.
- 6.2.59 Other aspects of the development guidelines relating to water (wastewater and water supply capacity) and piling, the decentralised energy network (DEN), contamination, and flood risk are addressed on other sections of this report. In summary, recommended conditions would satisfactorily address these aspects in accordance with the SA DPD.

Policies DM38: Employment-Led Regeneration & DM39: Warehouse Living

- 6.2.60 DM38 outlines how the Council supports proposals for mixed-use, employment-led development within a Local Employment Area – Regeneration Area where this is necessary to facilitate the renewal and regeneration (including intensification) of existing employment land and floorspace.
- 6.2.61 In this case the renewal, regeneration and intensification of the site requires a mixed-use proposal with new buildings to deliver the aims and objectives of the site allocation. Improvements to the public realm and pedestrian permeability require investment that would only come forward as part of a development such as that which is proposed.
- 6.2.62 In accordance with part a of DM38 the amount of employment floorspace to be provided within the mixed-use scheme has been maximised with regard to viability.
- 6.2.63 The proposals identify demonstrable improvements in the site's suitability for continued employment and business use. It would provide new Warehouse Living accommodation and commercial spaces that would result in an increased employment density in an appropriate location.
- 6.2.64 The commercial and internal and external workspaces have been designed flexibly to enable adaptability to different business uses over the lifetime of the development. Provision for workspace has been incorporated into the new buildings which would be provided for use free of charge as part of the rental agreement.
- 6.2.65 Through application of the Masterplan Framework principles the proposal would ensure an appropriate standard of amenity for the development's users and neighbours. By virtue of the fact that large parts of the site are currently vacant or cleared, the proposal would not conflict with or inhibit the continued employment function of the site and nearby employment sites.
- 6.2.66 The principle of new Warehouse Living development is supported as the scheme meets key requirements of policies DM38, DM39 as well as Site Allocation SA34. The proposals would increase employment floorspace and the submission of a Masterplan Framework identifies how the proposal would provide for the needs of residents and fit in with future development within other parts of the allocation.

6.3 Viability & affordability

- 6.3.1 Policy DM39 notes that consideration should be given to the host community's existing and future accommodation needs for creative living and working as well as viability, including requirements for cross subsidy from other uses including private residential development and recognises the need for low-cost

workspace and affordable residential accommodation to support and grow the existing start up and creative industry sectors.

- 6.3.2 The applicant has carried out their own survey that has identified that current rental levels in the District range from approximately £550-£1,000 per room with varying levels of quality. Given the new build nature of the accommodation the applicant considers that the space ought to secure rents near to the upper end of that scale.
- 6.3.3 For context, £950 per month is similar to what London Living Rent (LLR) would be for a one-bedroom apartment in the area. LLR is a type of intermediate affordable housing for middle-income Londoners who want to build up savings to buy a home. Rents for one-bedroom LLR apartments in Hermitage & Gardens Ward are currently set at £945 with rents in adjacent Seven Sisters Ward set at £975 per month.
- 6.3.4 Clearly the proposal is a very different form of accommodation to what would qualify as being suitable for LLR accommodation. Warehouse Living falls within an employment designation & a sui generis use class and is communal and not self-contained.
- 6.3.5 However, the total proportionate amount of private and shared internal and external floorspace made available to each resident would be comparable to the proportionate figure for a couple sharing a one-bedroom LLR flat – i.e. 25sqm per person.
- 6.3.6 Therefore, whilst the expected rent levels would be at the upper end of the spectrum for Warehouse Living in the area, they would reflect intermediate rents in the area for comparable levels of total floorspace per person.
- 6.3.7 The proposed rental levels would also be justified by the new build nature of the development (with higher build & design quality and better sustainability performance) and its suitability for Warehouse Living with enhanced floor-to-ceiling heights and access to dedicated internal and external spaces for work.
- 6.3.8 There is naturally a limit to the level of rent that this type of accommodation can attract given the shared nature of communal facilities that will ensure it continues to provide low-cost accommodation for occupiers in perpetuity.
- 6.3.9 The applicant's submitted Financial Viability Assessment (FVA) identifies that the proposals do not viably sustain any further affordable housing or contribution and could not sustain any further Section 106 financial contributions.
- 6.3.10 When initially submitted the scheme did not include the offer of the workshop units located in below ground levels of Block A to be used solely by occupants of the building as workspace. Initially these were commercial units to be let on

the open market, albeit with the intention for them to be occupied by workspace and artist studios.

- 6.3.11 The applicant's viability assessment identified that the scheme would generate a deficit of -£1,144,000 against the viability benchmark. The assessment has been reviewed by the Local Planning Authority's viability assessor (In this instance BNP Paribas Real Estate ("BNPP")) who identified the proposal generates a surplus of £464,097 against the viability benchmark.
- 6.3.12 Following discussion, the applicant accepted this position that the scheme would generate a surplus. Given the small size of the surplus it is considered that it would have only a modest public benefit if put towards conventional affordable housing delivery.
- 6.3.13 To ensure compliance with Policy DM39 which require consideration of the need for low-cost workspace, officers identified that an improved scheme and public benefits could be achieved if the workspace offer for Warehouse Living residents was enhanced by providing more of the commercial spaces for use as workspace for residents only and free of charge. This could also be easily delivered on-site and made available from occupation.
- 6.3.14 The applicant agreed to offer the areas labelled on the plans as Workshop Unit(s) Ground and Mezzanine in Block A of the Tewkesbury part of the Development rent-free in perpetuity for residents of the development. These comprise two units each measuring 55.3sqm GIA. This would absorb all of the surplus identified by BNPP, whilst it would provide additional dedicated workspace for creatives of the proposed development.
- 6.3.15 Policy DM38 of the Local Plan, identifies that an element of affordable workspace may be sought as a part of the commercial offer on employment-led mixed-use developments in local employment areas designated as Regeneration Areas. This is supported by the Planning Obligations SPD which requires all major mixed-use development within a Local Employment Area Regeneration Area to make provision for affordable workspace.
- 6.3.16 The Planning Statement identifies that 10% of the commercial floorspace will be let out at an affordable rent. This would be approximately just under 50sqm, and this could include for example a shipping container and the two street-facing commercial units in Block B.
- 6.3.17 Whilst the applicant has agreed to heads of terms and financial contributions relating to transport & highways, carbon management & sustainability, and employment & skills, the viability position does not allow for further contributions to affordable workspace or aspects identified in the site allocation such as

contributions to explore the opening up the south bank of the New River to institute a linear park.

6.3.18 Warehouse Living can be considered a form of affordable housing by its very nature and also provides workspace within the living space. The combination of workspaces and accommodation cuts costs by avoiding the need for residents to have to rent both a home/room as well as a space to work.

6.3.19 Whilst the applicant has attempted to limit rents, they have identified that rooms would need to be let at rental levels around £950 per room in order for the development to sufficiently cover build costs and remain viable. This figure would be in line with London Living Rent (LLR) intermediate levels for a 1-bed flat in the area, albeit the proposed building offers a different form of living if comparable floorspace per person.

6.3.20 A late-stage review would secure a contribution to affordable housing if rents exceed those set out in the viability report when any increase in costs is accounted for. The rents would be monitored over time to inform any future proposals for Warehouse living.

6.4 Impact on the amenity of adjoining occupiers

6.4.1 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.

6.4.2 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

6.4.3 The impacts of daylight provision to adjoining properties arising from the 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.

6.4.4 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.

- 6.4.5 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.
- 6.4.6 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.
- 6.4.7 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.
- 6.4.8 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.
- 6.4.9 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

- 6.4.10 The applicant's Daylight and Sunlight Report submitted in support of the application assessed the likely impacts on the following properties:
- Amhurst Court
 - Vivian House
 - 341 Seven Sisters Road
 - 343 Seven Sisters Road
 - 345 Seven Sisters Road
 - 6-10 Works Tewksbury Road
 - 1-19 Tewksbury Road
 - Cara House
- 6.4.11 The report found that 345 Seven Sisters Road meets the target values as set out in the BRE Guidelines for daylight (in terms of VSC and daylight distribution) and sunlight (in terms of APSH) with the proposed scheme in situ. All windows in the

side elevation of 341 Seven Sisters Road are understood to be of non-habitable use and 341 & 343 Seven Sisters Road only have spaces in each building that are non-sensitive to daylight & sunlight facing the development site.

6.4.12 6-10 Tewkesbury House is listed as being of commercial use by the Valuations Office Agency (VOA) and so is considered less sensitive to daylight and sunlight, and appropriately lit with the proposal in place.

6.4.13 Alternative Target Values: In many locations across Haringey and London, it is now commonplace for windows to retain less than 27% VSC as laid out in the BRE Guidelines. It should be noted that the BRE Guidelines have been written based on a suburban housing density model and that the GLA have asserted that retained VSC levels in the “mid-teens” can be appropriate for London.

6.4.14 The applicant has employed an alternative target value of 15% retained VSC in their assessment to better reflect the development context of this site. Using a VSC target of 15%, rather than BRE default of 27%, as an acceptable retained level of daylight is valid, the use of the mid-teen VSC benchmark has been held to be appropriate in denser, more built-up areas such as this.

6.4.15 For Vivian House 29 out of 58 windows meet the 15% VSC target value. Of the remaining 29 windows, 25 serve small kitchens or bathrooms and so are considered appropriately daylight. 51 out of 54 rooms meet the target value for daylight distribution; two of the remaining rooms are bathrooms or likely small kitchens and so considered not sensitive to daylight. In sunlight terms, all windows considered face within 90° of due north and so do not require analysis.

6.4.16 For 1-19 Tewkesbury Road nineteen out of 25 windows meet the VSC target value with the proposal in place; three of the remaining windows serve bathrooms and so can be disregarded. All five rooms analysed meet the target value for daylight distribution. All nineteen windows that face within 90° of due south meet the target values for annual and winter sunlight with the proposal in place or are within rooms that contain a further window that meets these target values.

6.4.17 Where windows serving habitable space do not meet the VSC target, they are within rooms where many other windows do meet this target. The mean retained VSC for the ground floor room is 25% and for the first-floor room it is 24%; both rooms, therefore, are considered to be well daylight given their urban context and, as the rooms experience unchanged levels of daylight distribution, the daylight position is likely to be unnoticeable between the existing and proposed scenarios.

6.4.18 Cara House: In daylight terms the analysis finds that 46 out of 105 windows meet the target VSC value with the proposal in place. 55 out of 70 rooms meet

the target daylight distribution value. In sunlight terms, 43 out of 49 windows that face within 90° of due south meet the target annual sunlight value.

- 6.4.19 Ten of the remaining windows are likely to be within rooms that also contain at least one window which meets the BRE Guidelines' recommendations for VSC i.e. they experience less than a 20% reduction from the existing position or they retain at least 27% VSC in absolute terms. A further 40 windows either themselves retain at least 15% VSC in absolute terms or are within rooms that contain at least one window that retains at least 15% VSC in absolute terms. As such, these windows meet the alternative target VSC value.
- 6.4.20 The remaining nine windows either serve the entrance lobby (and so can be disregarded as communal access/circulation space) or are obstructed to daylight and sunlight access by the design of Cara House itself. These windows are located on the lower ground floor, obstructed by a disabled access walkway, or are blinkered to one side by the overhanging awning to the entrance lobby.
- 6.4.21 The BRE Guidelines acknowledge the impact of overhanging projections on daylight and sunlight to windows below and recommends that analysis is undertaken without the obstructions in place to determine the impact of the proposed scheme in isolation. Were this to be undertaken, the results would likely be similar to the other unobstructed south facing windows on the same floor i.e. retained levels of VSC of approximately 15% which would be in line with the alternative target value.
- 6.4.22 In sunlight terms, one of the six windows that does not meet the annual sunlight target is within a room that contains a window that already does not meet this target and so is considered acceptable. The remaining windows are all obstructed by the architecture of Cara House itself, as described above, or serves circulation space and so should be treated more flexibly.
- 6.4.23 The submitted report finds that overall, where windows do not meet the BRE target value nearly all windows retain the alternative target VSC value or are within a room that contains at least one window which does so.
- 6.4.24 In a small number of cases, windows are also obstructed by the architecture of Cara House itself and if the obstructions to daylight were not present, the three affected windows would also likely meet the alternative target value of 15% VSC.
- 6.4.25 As such, Officers agree with the findings of the report that the overall impact to this building is considered minor adverse and thus acceptable. There would be some harm but the harm identified would not be undue and acceptable levels of daylight and sunlight would be retained within Cara House.

6.4.26 Overshadowing: In overshadowing terms, the report highlights that neighbouring gardens at 347-351 Seven Sisters Road do not meet the target sunlight amenity value in March but are shown to be well sunlit in June and thus are likely to be well sunlit across the summer months when these spaces are most likely to be in use. It should also be noted that these spaces are obstructed to sunlight in the existing scenario by the position of the built form of 347-351 to the south-east.

6.4.27 The findings for the gardens at 347-351 Seven Sisters Road would also be relevant to other open spaces to the north that have not been assessed. These spaces are currently obstructed to sunlight by the positioning of surrounding built form but are likely to be well sunlit across the summer months when these spaces are most likely to be in use.

Daylight/Sunlight & overshadowing - Summary

6.4.28 The majority of windows around the site meet the target daylight and sunlight values with the proposal in place. Where this is not the case, the relevant windows either meet an acceptable 15% VSC for the context or are already obstructed.

6.4.29 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 129(c) of the NPPF and paragraphs 1.3.45 and 1.3.46 of the Mayor of London's Housing SPG.

Overlooking/privacy

6.4.30 The proposed development would introduce buildings to the front of Cara House. The layout, siting, and orientation of Blocks A and B maximises the internal floorspace of these proposed buildings whilst ensuring sufficient space is left between the blocks and Cara House in order to retain acceptable levels of privacy for the occupants of Cara House and for the future occupants of the new blocks.

6.4.31 Window to window distances between Cara House and Block B would be approximately 13m. These distances would be shorter (approximately 9m at the closest point) from Block A. However, these views would be oblique given the orientation/angle of the north elevation of Block A which faces northwest.

6.4.32 These distances and relationships would be commensurate with distances in the area and in regeneration areas in urban locations elsewhere in the Borough. As such, the proposal would result in an acceptable level of privacy given this context and the emerging context for the District and Site Allocation.

Outlook and sense of enclosure

- 6.4.33 In terms of outlook, the site allocation and masterplanning for this site identifies the potential for a tall building at the corner of Eade and Seven Sisters Roads. Whilst there would be built form to the front of Cara House, it would be 4 storeys and the proposals would create a yard with improved security through passive surveillance.
- 6.4.34 Sufficient space would be retained between the buildings so as to avoid an undue sense of enclosure. Given that a tall building has been envisaged for the southern corner of the site, reductions in spacing between built form is to be expected. The Framework identifies that what is important is that the privacy and amenity of Cara House is respected. Through its siting, design, and orientation this has been achieved in the proposal.

Noise and dust

- 6.4.35 The nature of the proposed scheme means that, subject to using planning conditions to limit hours of use of the proposed commercial units and to control noise from mechanical plant, undue disturbance to existing and future residents would not be caused.
- 6.4.36 A Construction Logistics Plan, Demolition/Construction Environmental Management Plans, and details of how dust would be controlled and managed during construction would be secured by recommended conditions. These documents would ensure that disturbance during construction is minimised and mitigated.
- 6.4.37 A condition would secure compliance with a Warehouse Living Management Plan which would require details to be submitted relating to management measures such as move in and move out arrangements, maintenance, upkeep, servicing, etc. which would help reduce noise and disturbance for existing and future residents. This will ensure the development is well managed and does not impact negatively on the surrounding area.

6.5 Design

- 6.5.1 The NPPF (19 December 2023) 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 they fail 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).
- 6.5.2 London Plan Policy D4 encourages the use of masterplans and design codes and 3D virtual modelling and thorough scrutiny by officers and the design review process to help ensure high quality development (particularly, as in this case, the proposed development would include a tall building).

- 6.5.3 Local Plan Strategic Policy SP11 (Design), and Policies DM1 (Delivering High Quality Design) and DM6 (Building Heights) are relevant to the proposal. Local Plan Policy DM1 states that all development must achieve a high standard of design and contribute to the distinctive character and amenity of the local area. Further, developments should respect their surroundings by being sympathetic to the prevailing form, scale, materials, and architectural detailing.
- 6.5.4 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.

Quality Review Panel (QRP)

- 6.5.5 The scheme was presented to Haringey's Quality Review Panel most recently on the 03 May 2023 and prior to that on 14 December 2022 and 17 August 2022. The written findings of the reviews can be found within Appendix 7.
- 6.5.6 The summary of the latest report is as follows:

The panel strongly supports the scheme, which is characterised by imaginative design work and an intellectually rigorous approach. While the new warehouse living concept proposed carries risks, the panel considers it could also prove an important model for providing affordable space in future developments. The panel is now reassured that the majority of the materials proposed will be durable and sustainable, but asks for information on how cementitious board surfaces will weather. However, corrugated metal doors to the rubbish and cycle stores must also be robust and resistant to damage. The panel identifies some areas of detail that require some further attention. These include potentially extending the banding between floors onto the south-east elevation, which would create greater coherence in views of the building from the north. Reassurance is also needed that the double-height, glazed, south-east corner of the building will not lead to overheating. The quality of the public realm has also progressed well. The panel encourages maximisation of planting across the development, and potentially beyond the site on nearby land owned by the applicant. A green buffer should be considered for Cara Yard, the roof of the area separating Cara and Tewkesbury Yards could be greened to ensure it provides a pleasant view for residents, and walls should be covered with climbing plants.

- 6.5.7 A summary of the QRP concerns (summarised) and responses are listed below:

QRP Comment	Officer Response
Information should be provided on how cementitious board surfaces will weather.	The applicant has selected the materials after extensive testing and sampling. They explored different corrugated sheet materials and settled on cement board for its balance

	between economy, embodied carbon, robustness, and textural expression – sheet materials such as cement board skins are a typical characteristic of twentieth century warehouse design. The ‘natural’ colour and texture of the cement board would be expressed which would be contrasted by the introduction of flashes of colour on windows, brise soleils, curtain walling, etc.
Doors to the rubbish and cycle stores must also be robust and resistant to damage.	This is secured through ‘secured by design’ conditions which would require suitably resistant doors.
The banding between floors onto the south-east elevation could potentially be extended, which would create greater coherence in views of the building from the north.	Banding between floors has been used to provide horizontality to the facades that can be viewed from the north. It works with the banding to Cara House to create a coherent built form.
The double-height, glazed, south-east corner of the building must not lead to overheating.	A condition is recommended that would seek submission of an updated Overheating report that would enable the Local Planning Authority to assess overheating risk and to ensure that any necessary mitigation measures are implemented prior to construction and maintained thereafter.
Maximisation of planting across the development is encouraged, and potentially beyond the site on nearby land owned by the applicant. A green buffer should be considered for Cara Yard, the roof of the area separating Cara and Tewkesbury Yards could be greened to ensure it provides a pleasant view for residents, and walls should be covered with climbing plants.	The site-wide Framework puts forward a comprehensive and integrated landscape and public realm strategy for the site, which considers urban greening and ecological enhancement. Greening on site has been maximised given the site requirements which require hard landscaped areas for pedestrian movement and for the functions of Warehouse Living.
The panel commends the proposals, it thinks that the proposed approach, and the materials chosen, can result in a very high-quality building.	Noted.
The building appears better connected to the ground, and the ground floor is more	Noted.

integrated with the overall design.	
The panel suggests that the blank wall facing onto Eade Road would benefit from artwork, for example a mural, to soften its impact, with several options considered.	Condition to review details of artwork to buildings is recommended.
The panel considers that the quality of public realm design has improved significantly since the previous review, with important benefits in terms of both public safety and attractiveness.	Noted.
The panel suggests that the area of Grasscrete in Cara Yard could be reduced to create a more defined vehicle route. This would leave space for planting. The yard should be considered as a landscaped space that people can enjoy spending time in.	The planting in this location has been maximised given the need for this area to provide satisfactory space for deliveries and servicing of the development as well as cycle storage.

Building Scale, Form and Massing

- 6.5.8 London Plan Policy D3 states that development proposals should provide active frontages and positive relationships between what happens inside the buildings and outside in the public realm to generate liveliness and interest. They should encourage and facilitate active travel with convenient and inclusive pedestrian and cycling routes and legible entrances to buildings.
- 6.5.9 The buildings have been designed to provide active frontages wherever possible to deal with the current lack of frontages and passive surveillance in and around the site. Block B and A would provide active frontages onto Eade Road and Seven Sisters Road but would also improve and activate the public right of way down to Tewksbury Road.
- 6.5.10 New frontages would be created on the eastern flank of Block A and within the redeveloped units to the rear/lower-ground/basement levels of 341 and 343 Seven Sisters Road, with this activation continuing with the openings to the shipping containers situated along Tewksbury Yard.
- 6.5.11 The development would create and animate a network of new and improved existing spaces and links. This, along with the height and design of the building

and landscaping proposals would provide an appropriate marker and gateway to the District when approached from the south from Seven Sisters Road.

- 6.5.12 The stepped footpath would feature benches and planting troughs, with the entrance to the steps and yard spaces containing trees, planters, and further seating to encourage people to stop and dwell, using the commercial units.
- 6.5.13 The buildings take the proposed form so as to maximise activation whilst ensuring appropriate relationships are maintained with Cara House and surrounding buildings and spaces.
- 6.5.14 The layout ensures that public realm improvements can be made to facilitate active travel, that sufficient space is provided for servicing and deliveries, and ensures that liveliness and interest would be generated at this significant location. Which would be a significant improvement on the existing situation.
- 6.5.15 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).
- 6.5.16 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).
- 6.5.17 The strategic requirement of London Plan Policy D9 (Part B) is for a plan-led approach to be taken for the development of tall buildings by boroughs and makes clear that tall buildings should only be developed in locations that are identified in development plans. The Site Allocations DPD identifies in the Site Requirements for SA34: Overbury & Eade Rds that there is potential for a building on the corner of Eade and Seven Sisters Roads marking the gateway to the Warehouse District from Seven Sisters Road.
- 6.5.18 London Plan Policy D9 (Part C) sets out a comprehensive set of criteria for assessing the impacts of proposed tall buildings and these are discussed in detail below.
- 6.5.19 Strategic Policy SP11 requires all new development to enhance and enrich Haringey's built environment and create places and buildings of high quality. Policy DM6 provides further criteria for the design of tall buildings, including to conserve and enhance the significance of heritage assets, their setting and the wider historic environment that would be sensitive to taller buildings.

- 6.5.20 The policy also seeks to protect and preserve existing locally important and London-wide strategic views in accordance with Policy DM5 (with Figure 2.1 in the DMDPD confirming that the site does interact with the Alexandra Palace to Central London (City and St Paul's) Panorama strategic view or London View Management Framework (LVMF) View 1A (Alexandra Palace)). Therefore, an urban design analysis is required to be submitted with applications for tall buildings assessing the proposal in relation to the surrounding context.
- 6.5.21 The potential impact on LVMF View 1A (Alexandra Palace) has been assessed as part of the applicant's Townscape, Heritage, and Visual Impact Assessment (THVIA). This shows that the proposals would be partially visible in the distant background of the view alongside other large and tall buildings in the panorama.
- 6.5.22 The proposals would be largely screened from view in the summertime due to the location of mature trees. There would be no impact on the strategic landmark (St Pauls) or any of the other landmark features listed in the London View Management Framework SPG. The application does not conflict with London Plan Policy HC3 (Strategic and Local Views) and HC4 (London View Management Framework).

Proposed Tall Building

- 6.5.23 SP11 identifies that the Council has adopted the definition of Tall and Large Buildings as those which are substantially taller than their neighbours, have a significant impact on the skyline, or are of 10 storeys and over or are otherwise larger than the threshold sizes set for referral to the Mayor of London, as set out in the London Plan.
- 6.5.24 SP11 goes on to say applications for tall buildings will be assessed against the following criteria (summarised): masterplan framework, assessment supporting tall buildings in a Characterisation Study, compliance with DM policies and all the relevant recommendations in the CABI / English Heritage "Guidance on Tall Buildings" 2007 (since superseded in 2015 and 2022).
- 6.5.25 DM6 part C sets out detailed policy requirements for tall buildings;
- being in an area identified as suitable,
 - represent a landmark by which its distinctiveness acts as a wayfinder or marker,
 - is elegant and well proportioned,
 - visually interesting when viewed from any direction,
 - positively engages with the street environment,
 - considers impact on ecology and microclimate,
 - going onto requiring where tall buildings are in close proximity to each other they avoid a canyon effect,
 - consider their cumulative impact,
 - avoid coalescence, and
 - collectively contribute to the vision and strategic objectives for their area.

6.5.26 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.

6.5.27 Given that London Plan Policy D9 is the most up-to-date development plan policy on tall buildings and includes the most comprehensive set of impact criteria and covers nearly all the criteria covered in Haringey's own tall buildings policies, this has been used as a basis of an assessment. It incorporates most of the relevant criteria set out in Local Plan Policy DM6, although specific criteria from this policy are also addressed below.

6.5.28 It is noted the GLA Stage 1 response states that because the application proposes the construction two new buildings over 4 and 8-storeys, based on the Local Plan definition, the proposed scheme would be classified as a taller building rather than a tall building and, as such, London Plan Policy D9 is not engaged.

6.5.29 Nevertheless officers consider it appropriate to assess the proposal against Policy D9, this is because from Tewksbury Road the building would be 10 storeys and over. Moreover, even when taken from Seven Sisters Road the building is taller (from ground to top of roof top plant) than the threshold size – i.e. 30m set for referral to the Mayor of London which SP11 says would constitute a tall building.

6.5.30 Location - As stated above, there is policy support for the potential for a building on the corner of Eade and Seven Sisters Roads marking the gateway to the Warehouse District from Seven Sisters Road.

6.5.31 Visual impacts – Part C (1) of London Plan Policy D9 sets out the following relevant criteria that are addressed in turn.

(a) (i) long-range views – the top of proposed tall buildings should make a positive contribution to the existing and emerging skyline and not adversely affect local or strategic views.

(a) (ii) mid-range views - the form and proportions of tall buildings should make a positive contribution to the local townscape in terms of legibility, proportions and materiality.

6.5.32 The corner of the application site onto Seven Sisters Road forms a landmark, “shopwindow” location for the Warehouse District and meets the “wayfinder” criterion for a tall or taller building. This is acknowledged in the development requirements for the site in the Site Allocation.

- 6.5.33 The full height of the proposal would only be visible from the north or rear of the site. From the front on Seven Sisters and Eade Roads the lowest two floors would be below ground, and the top floor is set back behind a deep roof terrace, providing a large communal private amenity space. Thus, the proposal would be perceived as a 7-storey building from the front, rising to 10 storeys at the rear.
- 6.5.34 Further along the Eade Road frontage, the proposal drops to four storeys, with a narrow gap providing access to Cara Yard and Cara House. This would act as a separate, smaller, Warehouse Living block, but with the same architectural language, openings, and materiality - but of a height matching the surroundings.
- 6.5.35 To the rear of the main block, either side of Tewkesbury Yard, 10 single and two storey shipping container commercial units would sit behind the maximum height. The area of Tewkesbury Road and its yard spaces is already somewhat overshadowed by the effective five and six storey height of the Seven Sisters Road buildings and Cara House.
- 6.5.36 These small, intimate yard spaces would be overshadowed more by the 10 storeys of the main new building, but these are small scaled, intimate spaces, with lively vibrant street life and animated ground floors, and the attention of residents and visitors is unlikely to be on the more distant view.
- 6.5.37 From further back down Tewkesbury Road the new buildings would complete the termination of the vista, but from further back the tallest element begins to act beneficially as a landmark and wayfinder of the location of the steps and gateway to the Warehouse District from Seven Sisters Road.
- 6.5.38 There are several significantly taller buildings up and down Seven Sisters Road a short distance from the site, especially in the Woodberry Down Estate just to the southwest. This large 1930s council estate of four to twelve storey blocks is currently in the process of being redeveloped at greater density, with genuinely tall buildings amongst the mix, rising to 31 storeys.
- 6.5.39 The estate also crowns the top of a hill, higher than the front of the site of this application, and therefore somewhat more distant views of these blocks are even more dominant on the skyline in views from areas just to the north. A range of near and middle-distance views of the proposals demonstrate it would sit harmoniously in its gritty industrial context whilst providing a landmark marking the gateway to the Warehouse District on Seven Sisters Road.

(a) (iii) immediate views from the surrounding streets – the base of tall buildings should have a direct relationship with the street, maintaining the pedestrian scale, character and vitality of the street. Where the edges of the site are adjacent to buildings of significantly lower height or parks and other open

spaces there should be an appropriate transition in scale between the tall building and its surrounding context to protect amenity or privacy.

6.5.40 The application scheme would relate well with adjacent buildings within the site allocations and adjacent sites. The ground floor would be activated and support activity on the accompanying public realm – particularly along the footway down to Tewksbury Road. The topography of the site would support the proposed height and scale, with front elevation appearing as a 7-storey building from Seven Sisters/Eade Road.

6.5.41 The lower block – Block B would reflect the height of the surrounding buildings. Whilst the height of Block A would be taller, at 7/8 storeys when viewed from Seven Sisters/Eade Road, it would be an appropriate transition from the surrounding context. It would be sufficiently tall to mark the gateway whilst still sympathetic in scale to its surroundings.

(b) whether part of a group or stand-alone, tall buildings should reinforce the spatial hierarchy of the local and wider context and aid legibility and wayfinding.

6.5.42 The proposal would fulfil the site requirement of the allocation to mark the gateway to the District from Seven Sisters Road. Block A would act as a local / neighbourhood marker for the District. Meeting the site requirement for a gateway marker is the rationale for the height and form of the building.

6.5.43 The tall building would signpost the improved footpath in line with DM6 - the height, mass, and appearance would draw attention to the District on the skyline and would create a new gateway into the area.

(c) architectural quality and materials should be of an exemplary standard to ensure that the appearance and architectural integrity of the building is maintained through its lifespan.

6.5.44 The proposed elevational composition and materiality expresses the industrial character of the Warehouse District setting, acting as a sign and gateway to the District from Seven Sisters Road.

6.5.45 A palette based on metal and concrete has been proposed because of its presence in the District. The buildings would utilise exposed fair faced concrete, cementitious board with corrugated patterns referencing the existing industrial buildings, paired with green coloured metal to windows, brise soleils, floor bands, external stairs, roof canopies etc.

6.5.46 Several rounds of testing was carried out by the architects to analyse different combinations of colours and textures for the material palette. This testing, as shown in the Design and Access Statement (DAS), led the applicant team to the chosen combination. Officers agree that the proposed choices would work

best in terms of managing to be sympathetic to the surroundings whilst having a sufficiently industrial, warehouse appearance.

6.5.47 Both Warehouse Living buildings share a common ground floor with an elevated floor to ceiling height. Whilst the ground floor areas of both buildings must house ancillary spaces such as plant, refuse, and cycle storage - the ground floor spaces are designed to maximise both floorspace and frontage in commercial use in order to activate the adjacent streets. The most robust materials available within the palette are used in this location: solid concrete masonry, and tough metal gates and doors which matches the robust metal to the commercial units in the shipping containers.

6.5.48 The upper floors are laid out rationally, which is expressed in the repeated bedroom windows, banding demarcating floors and corner balconies, with the main corner further emphasised with double height living-workspace opening onto double height corner balconies.

6.5.49 The flank end elevation of the main taller building is further emphasised with circular windows onto the shared kitchens; the architects have demonstrated the local precedents for and functionality of this feature, but in design terms it can simply be justified as being appropriate on a taller, landmark building marking an important gateway and corner.

6.5.50 Although precise materials and details will be secured by condition, those proposed in the application would be attractive, durable, and complementary to the existing and emerging context.

(d) proposals should take account of, and avoid harm to, the significance of London's heritage assets and their settings. Proposals resulting in harm will require clear and convincing justification, demonstrating that alternatives have been explored and that there are clear public benefits that outweigh that harm.

6.5.51 The proposed tall building would positively contribute to the character of the area. The potential impacts on above ground heritage assets are addressed under *Impact on heritage assets including affected conservation areas* below.

6.5.52 In summary, the proposed development would have a neutral impact on the significance of the designated heritage assets, and the majority of the non-designated heritage assets, for which the site forms part of their setting. Whilst there would be some harm to the significance of locally listed building Woodberry Down Baptist Church there are clear public benefits that outweigh that harm. Again, this is identified in the heritage assessment below.

6.5.53 As noted above, the proposals would be largely screened from the Alexandra Palace to Central London (City and St Paul's) Panorama strategic view (LVMF View 1A) in the summertime due to the location of mature trees. There would be

no impact on the strategic landmark (St Pauls) or any of the other landmark features listed in the London View Management Framework SPG.

(g) buildings should not cause adverse reflected glare.

6.5.54 The buildings have been appropriately designed to respond to the proposed uses, the range of internal environments, and the surrounding context. Given the proposed materials would consist of predominately cement board with dull metal accents, there is unlikely to be adverse reflected glare.

(h) buildings should be designed to minimise light pollution from internal and external lighting.

6.5.55 There are no proposals to externally illuminate the proposed tall building and officers do not consider that there would be any significant adverse effects from internal lighting for this site given the existing emerging form of development in the area.

6.5.56 Functional impacts – Part C (2) of London Plan Policy D9 sets out the following relevant criteria that are addressed in turn:

(a) the internal and external design, including construction detailing, the building's materials and its emergency exit routes must ensure the safety of all occupants.

6.5.57 Fire safety is addressed below and is considered acceptable subject conditions.

(b) buildings should be serviced, maintained and managed in a manner that will preserve their safety and quality, and not cause disturbance or inconvenience to surrounding public realm. Servicing, maintenance and building management arrangements should be considered at the start of the design process.

6.5.58 The London Plan (supporting text 3.4.9 for Policy D4) stresses the importance of these issues for higher density developments. Vehicular servicing is discussed under *Transportation, parking, and highway safety* below and is considered acceptable subject to a Delivery and Servicing Plan (which is recommended by planning condition).

(c) entrances, access routes, and ground floor uses should be designed and placed to allow for peak time use and to ensure there is no unacceptable overcrowding or isolation in the surrounding areas.

6.5.59 The proposed buildings would be accessed from entrances within Cara Yard off of Eade Road, this enables the commercial frontage onto the adjacent streets to be maximised. The ground floor commercial spaces as well as the improved

footway down to Tewksbury Road would be prominent and legible. The retail and commercial ground floor uses would activate the adjacent public spaces.

(d) it must be demonstrated that the capacity of the area and its transport network is capable of accommodating the quantum of development in terms of access to facilities, services, walking and cycling networks, and public transport for people living or working in the building.

6.5.60 The capacity of the transport network is addressed under *Transportation, parking, and highway safety* below. In summary, this is considered to be acceptable.

(e) jobs, services, facilities, and economic activity that will be provided by the development and the regeneration potential this might provide should inform the design so it maximises the benefits these could bring to the area and maximises the role of the development as a catalyst for further change in the area.

6.5.61 The improved staircased footway and proposed commercial units and associated economic activity/job opportunities would make a positive contribution towards the regeneration of the area, as would the occupants who would use local shops and services and add to the creative community in the District.

(f) buildings, including their construction, should not interfere with aviation, navigation or telecommunication, and should avoid a significant detrimental effect on solar energy generation on adjoining buildings.

6.5.62 The site is not within an 'aerodrome safeguarding' zone and subject to the inclusion of aircraft warning lights (on construction cranes and completed buildings) required by regulations, the proposed tall building is considered acceptable in this regard.

6.5.63 Proposed roof-top PV arrays are addressed under *Energy, Climate Change & Sustainability* below and are considered acceptable (there are no existing PV arrays on buildings in the area that would be adversely affected).

6.5.64 Environmental impacts – Part C (3) of London Plan Policy D9 sets out the following relevant criteria that are addressed in turn:

(a) wind, daylight, sunlight penetration and temperature conditions around the building(s) and neighbourhood must be carefully considered and not compromise comfort and the enjoyment of open spaces around the building.

6.5.65 In summary, subject to a condition ensuring that all necessary wind mitigation measures are incorporated into the proposed scheme to ensure acceptable conditions on the terraces, no likely significant residual wind effects are

predicted and the likely resultant wind environment for pedestrians and existing and future residents is considered acceptable.

6.5.66 Wind is addressed in full under the *Wind and Microclimate* section below.

6.5.67 Daylight and sunlight impacts on neighbouring properties is assessed under the *impact on the amenity of adjoining occupiers* section; and temperature conditions are assessed under *Energy, Climate Change and Sustainability*.

(b) air movement affected by the building(s) should support the effective dispersion of pollutants, but not adversely affect street-level conditions.

6.5.68 Potential air quality impacts are addressed under *Air Quality* below and are considered to be acceptable.

(c) noise created by air movements around the building(s), servicing machinery, or building uses, should not detract from the comfort and enjoyment of open spaces around the building.

6.5.69 Potential noise and vibration impacts on future occupants are addressed under *Quality of Accommodation* below, with the effect on neighbours assessed under impact on the amenity of adjoining occupiers above and are considered to be acceptable, subject to approval of details (which is to be reserved by a recommended planning condition).

6.5.70 Cumulative impacts – Part C (4) of London Plan Policy D9 requires the cumulative visual, functional, and environmental impacts of proposed, consented and planned tall buildings in an area to be considered when assessing tall building proposals.

6.5.71 The submitted Townscape, Heritage, and Visual Impact Appraisal (THVIA) takes account of permitted and consented schemes as well as the application scheme. The study area for the assessment of townscape effects has been set at a 1 kilometre/500 metre radius from the application site and assesses impacts on 4 Townscape Character Areas surrounding the site.

6.5.72 The purpose of the assessment is to identify an area across which the proposed development would likely impact and effect the townscape and views. The proposed study area is considered to be proportionate to the proposed development and whilst it may be perceived beyond the study area, it is considered that it would not result in townscape or visual effects, due to the combination of distance and intervening features.

6.5.73 As outlined above, London Plan Policy D9 identifies most of the relevant criteria in Local Plan Policy DM6. However, a number of specific Local Plan criteria are addressed below:

Policy DM6 (D) (a) requires tall buildings within close proximity to each other to avoid a canyon effect and Policy DM6 (D) (c) requires tall buildings to avoid coalescence between individual buildings.

6.5.74 Block A would be the only tall building proposed in the scheme. As such the proposal would avoid creating a canyon effect as there would only be Block A protruding above the prevailing height and character. The tallest element of Block A would be lower than 10 storeys when viewed from Seven Sisters Road and would be angled away from neighbouring buildings. There would be sufficient space surrounding the Blocks and variations in height to avoid coalescence between individual buildings.

6.5.75 Cara Yard and the footway down to Tewksbury Yard would provide sufficient gaps and create comfortable relationships and defined streets that would prevent a feeling of enclosure or a canyon effect. The distances between buildings are similar to the distances between other buildings in the District and also similar to distances between buildings in high-density locations in Haringey and across London.

Policy DM6 (D) (d) requires applications for tall buildings to demonstrate how they collectively contribute to the delivery of the vision and strategic objectives for the area.

6.5.76 The submitted THVIA, DAS, and particularly the Masterplan Framework fulfil this requirement, and officers have taken account of these assessments when considering the proposals. The Masterplan Framework identifies the applicant's vision for the Site Allocation and indicates how it would be delivered.

Policy DM6 (E) – requires the submission of a digital 3D model to assist assessment.

6.5.77 This has been submitted and officers have used this to support their consideration of the proposals.

Townscape and Visual Effects

6.5.78 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.

6.5.79 The submitted Townscape, Heritage, and Visual Impact Appraisal (THVIA) considers likely significant townscape and visual effects across the study area. This has also helped inform the assessment of likely significant effects on built heritage, which is addressed below under 'Impact on heritage assets including affected conservation areas'.

6.5.80 As part of the THVIA, 12 representative views have been produced. The site does fall within a Strategic View as identified in the Mayor's London View Management Framework (LVMF) but does not fall within any Locally Significant Views as identified by Policy DM5.

6.5.81 The assessment has considered the effects on 12 representative views as summarised in Table 3 below. It is representative of the main visual receptors in the surrounding area. It found that there would be views of the proposed development in long views from open spaces on higher ground at Alexandra Palace. There would also be change as a result of the proposed development in several views from viewing positions in the immediate area.

Table 3 *Visual Receptor's Representative Views Appraisal of Effects*

No. / Location	Sensitivity	Magnitude of change	Effect
RV1: Alexandra Palace	High	Very low	Minor / Neutral
RV2: Tewkesbury Road	Low	High	Moderate / Beneficial
RV3: Seven Sisters Road (north)	Medium to low	Low	Moderate to minor / Beneficial
RV4: Vartry Road	Medium	Low	Moderate to minor / Beneficial
RV5: Seven Sisters Road (south)	Low	Medium	Moderate to minor / Beneficial
RV6: New River Footpath	High to medium	Medium to low	Moderate / Beneficial
RV7: Eade Road	Low	Low	Minor / Beneficial
RV8: Woodberry Grove	Medium to low	Very low	None
RV9: Woodberry Down East Reservoir	High	None	None
RV10: Avenue Road	High to medium	None	None
RV11: Chestnuts Park	High	Very Low	Minor / Neutral
RV12: Finsbury Park	High	None	None

6.5.82 Overall, the THVIA considers that the proposed development would lead to the following residual, direct, permanent, effects on the representative views, as summarised in Table 3 above:

- Moderate and beneficial effect – RV2: Tewkesbury Road and RV6: New River Footpath
- Moderate to minor and beneficial effect – RV3: Seven Sisters Road (north) and RV4: Vartry Road, RV5: Seven Sisters Road (south)
- Minor and beneficial effect – RV7: Eade Road
- Minor and neutral effect – RV1: Alexandra Palace and RV11: Chestnuts Park

6.5.83 The THVIA identifies that the proposed development has either a negligible or no effect on the remaining viewpoints. It notes that the view from RV11: Chestnuts Park would be restricted with the redevelopment of St Ann's Hospital.

6.5.84 The summary findings of the submitted TVIA are considered to be accurate in that it is considered that the visual effects of the proposed development would be acceptable. It would generally be a positive element in the wider urban scene and would not harm the visual amenities of residents in the surrounding area.

Inclusive Design

- 6.5.85 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.
- 6.5.86 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. The proposed amenity spaces are designed to be safe at different times of the year.
- 6.5.87 An accessible ramp to the staircased footway down to Tewksbury Road was tested extensively early on in the design process but could not be incorporated into the proposal due to the length of ramp required (165.5m). The utilisation of the existing public route with enhancements to wayfinding is deemed an acceptable approach when balanced with the wider public benefits provided by the overall development.
- 6.5.88 Building access, internal corridors and vertical access are capable of meeting Building Regulations. Blue badge parking has been incorporated into the proposals (albeit outside the site on street) and the proposed cycle parking shall include spaces for 'adaptive' and large bikes/mobility scooters.
- 6.5.89 Overall, officers are satisfied that the proposed scheme would be accessible and inclusive. The proposals in relation to wheelchair accessible accommodation is discussed under *Quality of Accommodation* below.

Secured by Design

- 6.5.90 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.
- 6.5.91 The proposed layout incorporates a good front to back relationship and includes active ground floor frontages in the form of commercial units, with front doors on the streets. This should all help ensure a safe and secure development and an active public realm.
- 6.5.92 The detailed design of the public realm, including proposed landscaping and lighting, are also considered acceptable. The proposed roof top private communal amenity space has been suitably designed to safeguard safety and security.
- 6.5.93 A condition is recommended which would require Secured by Design accreditation and ensure The Metropolitan Police's Designing Out Crime Officer's (DOCO) continued involvement in detailed design issues.

6.6 Impact on heritage assets including affected conservation areas

- 6.6.1 Paragraph 208 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.
- 6.6.2 Policy SP12 of the Local Plan seeks to maintain the status and character of the Borough's conservation areas. Policy DM6 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.
- 6.6.3 Policy HC1 of the London Plan states that development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings.
- 6.6.4 The policy further states that development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process. The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the statutory duties for dealing with heritage assets in planning decisions.
- 6.6.5 In relation to listed buildings, all planning decisions should "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" and in relation to conservation areas, "special attention should be paid to the desirability of preserving or enhancing the character or appearance of that area".
- 6.6.6 The NPPF states that when considering the impact of the proposal on the significance of a designated heritage asset, great weight should be given to the asset's conservation and the more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting.
- 6.6.7 The Council's Conservation Officer commented that the proposal would have a neutral impact on or would not harm the following heritage assets: Alexandra Palace & views, Woodberry Down Community JMI School, the Stoke Newington Reservoirs, Filter Beds and New River Conservation Area, the locally listed Maynards Sweet Factory, and 590 (former Weights and Measure Office) Seven Sisters Road & 100 Amhurst Park.

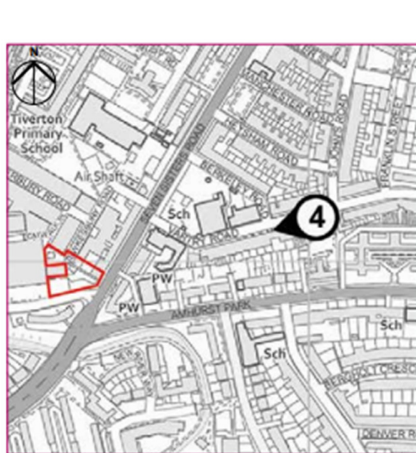
Woodberry Down Baptist Church

- 6.6.8 Woodberry Down Baptist Church is a locally listed building and is an attractive late C19 church designed by Paull and Bonella. The church was built in an

imposing design and has some local landmark qualities. The church is prominent in several short to medium range views, including Vartry Road where the building terminates the view of the road westwards.

- 6.6.9 Representative view 4 in the THVIA demonstrates the impact of the proposed development, which given its scale on the skyline, would diminish the prominence and part of the landmark quality of the church in this view. Accordingly, this would be considered to cause some harm to the significance of the non-designated heritage asset. Representative View 4 is shown below.

Figure 19 – *Representative View 4 Location, baseline condition, and representative view*



6.6.10 The harm identified would only be present in Representative View 4 with the building retaining its landmark quality in Representative View 3: Seven Sisters Road (north) and in views looking north nearer to the junction with Vartry Road where the towers of the Seven Sisters elevation of the building can be viewed when the street trees are not in leaf.

6.6.11 Representative view 4 takes in elements of the locally listed building and has moderate scenic value, resulting in a medium value. The harm to the heritage asset would be less than substantial. If there was a scale of less than substantial harm, then the harm would be towards the lower end of a minor impact. It would

be harm to one view of medium value, where the Baptist Church would still retain some prominence, albeit somewhat diminished by the proposal.

Legal Context

- 6.6.12 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".
- 6.6.13 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."
- 6.6.14 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."
- 6.6.15 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.
- 6.6.16 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.
- 6.6.17 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.

6.6.18 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.

6.6.19 In terms of non-designated heritage assets, the effect of an application on significance should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

6.6.20 In short, there is a requirement that the impact of the proposal on 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 conclude on the overall heritage position.

6.6.21 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.

The planning balance

6.6.22 Taking full account of paragraphs 203 and 209 of the NPPF, the harm identified has been given significant weight and requires a balancing exercise against public benefit.

6.6.23 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:

- The proposals would result in a net gain of 40 homes (Using a PBSA ratio of 2.5:1) which would make a welcome contribution towards delivering the borough's overall 10-year housing target;
- Capped rents that would provide accommodation for creatives at Intermediate equivalent rental levels;
- Fulfilling the aims and objectives of the Site Allocation and DM38 and 39 with new high-quality purpose-built Warehouse Living accommodation and public realm improvements;
- Creating new, high-quality commercial spaces that would activate the streetscape;

- Creating a new, high-quality building that successfully marks the gateway to the Warehouse District from Seven Sisters Road;
- The creation of a high-quality and secure public realm with improved links and connectivity from Seven Sisters Road - along Tewksbury Yard – to Tewksbury Road, this represents a significant improvement to the existing alleyway which is unattractive and unsafe;
- The creation of new employment opportunities during the construction and operational phases, with opportunities for local recruitment and skills development;

6.6.24 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 to the non-designated locally listed building Woodberry Down Baptist Church.

Heritage Conclusion

6.2.25 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.

6.2.26 The proposed scheme would preserve nearby listed buildings and their setting and the character and appearance of nearby conservation areas. The proposal would have a minor impact on views of medium value from Vartry Road on locally listed building Woodberry Down Baptist Church. This limited impact on significance has to be weighed proportionally in the planning balance, in accordance with paragraphs 209 of the NPPF. Officers consider that the resultant harm falls in the less than substantial category.

6.2.27 As such, paragraph 208 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 (208 and 209) is considered to be outweighed by the public benefits referred to above.

6.7 Quality of Accommodation

6.7.1 There are no defined standards and requirements such as floorspace standards for Warehouse Living in the Local or London Plans. It is expected that any proposed accommodation is of a high-quality design that includes consideration for unit size, daylight & sunlight, and provision made for residents with disabilities. Adequate functional living space and layout must also be provided.

6.7.2 DM39 requires proposals for warehouse living to provide an appropriate standard of living for the integrated residential element and regard to be had to, the host community's existing and future accommodation needs for creative living and working and the internal layout of uses and therein, the potential to

optimise the positive interrelationships and avoid, where practicable, negative impacts.

- 6.7.3 The applicant's Masterplan Framework submitted alongside the application identifies the key characteristics of existing spaces in the District and has put together a table of qualities and standards to be met by all new and refurbished Warehouse Living buildings whilst avoiding some of the negative aspects of existing warehouse living.
- 6.7.4 The applicant has derived their standards from an analysis of existing conditions, consultation with residents, existing House in multiple occupation (HMO) standards, and guidance contained within the GLA's January 2022 publication on Large Scale Purpose Built Shared Living (LSPBSL). They have considered different types of housing which Warehouse Living shares characteristics with to formulate a suitable guide that proposals in the allocation should adhere to.
- 6.7.5 The Framework identifies that the key characteristics of existing Warehouse Living are as follows:
- Voluminous, adaptable, and flexible working / living space;
 - Sense of ownership and identity inside and outside;
 - Dedicated and non-dedicated work spaces - from private bedrooms to communal living areas to public open spaces; and
 - Variety of external spaces for working, collaborating, and integrating with each other.
- 6.7.6 The nature of the housing element and its 'sui generis' classification draws comparison with HMO use, and several of the existing warehouses are classified as large scale (sui generis) HMOs. However, as the Planning Statement explains, the nature of the application proposals (larger scale generally, the extent of communal/shared living space, and the substantial working spaces), differs from a traditional HMO and hence the new and specific planning policies relating to the Warehouse Living concept.
- 6.7.7 The internal layout of Block A comprises 3 clusters of 14 bedrooms, 1 of 12, 1 of 5, and 1 of 4 on the ground floor. The larger clusters of bedrooms would be two storey and linked to large two-storey communal kitchen/living/workspace rooms with external balconies and double-height spaces. Block B to the west comprises 3 clusters of 6 bedrooms linked to kitchen/living/workspace rooms on each floor.
- 6.7.8 Within Block A, communal spaces would range from 40 to 50 sqm in terms of overall footprint. Additional volumetric space would be provided through the use of split mezzanine spaces. Where these are proposed the overall height of the double height spaces would therefore range up to 7 metres in height in total,

with each individual floor comprising 3.5 metre floor to ceiling height (albeit reduced somewhat with ceiling systems added).

- 6.7.9 Within Block B and within the single storey 5 x 5 bed units and 1 x 4 bed unit in Block A the kitchen/living/workspace would have enhanced floor to ceiling heights of 3.5/3.1m but would be arranged over a single level. The communal kitchen/living/workspace within Block B would be on every floor and sized at approximately 40sqm, with south facing balconies attached.
- 6.7.10 All of the communal kitchen spaces would have good access to daylight and sunlight, with very generous glazing and floor to ceiling heights proposed as well as openable windows and terraces. Each communal amenity space would face south / east, north-east, with deep projecting balconies and roof terrace areas provided to avoid overheating and allow direct access to outside space and passive ventilation.
- 6.7.11 The proposed bedrooms meet the standards identified in London Plan policy D6 'Housing quality and standards' with single bedrooms meeting the minimum floor area of at least 7.5 sqm and the double rooms being 11.5 sqm, with both being at least 2.15m wide. These standards only apply to rooms in typical C3 homes but act as a useful guide as a baseline for bedroom sizes.
- 6.7.12 HMO standards require bedrooms to be sized at 10sqm for a single room and 15sqm for a double room. These room sizes are required as the only space the tenant has access to in the building in many HMOs is their bedroom as there may be no communal areas. The 10sqm single room/15sqm double room floor space figure addresses this lack of accessible space elsewhere in the building.
- 6.7.13 The proposed room sizes would be smaller than those identified in the draft Large Scale Purpose Built Shared Living guidance. However, LSPBSL rooms often contain bathrooms/toilets and kitchenettes which takes up a significant portion of the footprint of a room. Communal toilets and bathrooms are proposed for all units within the corridors which would be easily accessed by all occupants.
- 6.7.14 The tall floor-to-ceiling heights proposed creates the opportunity to introduce a deck bed space with workspace / living space below. The proposals provide bedroom spaces with a 3.5m floor to ceiling height (3.1m with ceiling system), which creates the opportunity to insert bed decks, and increase the overall working / living space within each room.
- 6.7.15 Therefore, whilst the bedspaces would be compact in footprint terms, they would be voluminous with generous floor-to-ceiling heights which when combined with a raised bed deck would provide additional usable floorspace. The proposed rooms would also have access to generous communal amenity

and workspace within the cluster as well as a roof terrace and dedicated workspace in the below ground levels of the building.

- 6.7.16 Policy does not specify a percentage of rooms that must be accessible and/or wheelchair adaptable, however, across other forms of accommodation 10% of the number of rooms being suitable for wheelchair users is generally the standard.
- 6.7.17 Level access would be provided from the street into the entrance areas, the stores, workspaces, and all the commercial units. Standard access provisions in all Warehouse Units would be designed to comply with Approved Document M4(2) Accessible and adaptable dwellings. 11 units (equating to 10%) would comply with the provisions of M4(3) Wheelchair user dwellings and there would be 1 accessible bathroom per unit. Recommended conditions would ensure this provision is delivered and retained and that the development caters for all.
- 6.7.18 A large amount of both external and internal shared amenity space is proposed for the Warehouse Living use within the building. Each cluster would have its own kitchen/living/workspace with an external balcony. In addition to the amenity space specific to each cluster, the development also proposes a communal roof top amenity space, open to all residents, and access to the yard spaces, of which Cotton Mill Yard would be solely for amenity/workspace use.
- 6.7.19 In summary, the overall quality of the proposed Warehouse Living accommodation is considered to be of an acceptable quality with good levels of provision of communal kitchens and living/work spaces linked to clusters of bedrooms on each floor and generous 3.1 metre floor to ceiling heights proposed that will meet the host community's future accommodation needs for creative living and working;

Internal daylight & sunlight and aspect

- 6.7.20 The applicant has submitted internal daylight & sunlight analysis which demonstrates that 93% of the rooms would achieve their assigned target illuminance value appropriate for the principal use over at least 50% of the room area. In relation to internal sunlight amenity, 53% of rooms would have sufficient access to sunlight.
- 6.7.21 The overall proportion of rooms meeting the target daylight value represents a well daylight scheme compared to other schemes of this scale in built up urban locations. Where rooms do not meet their target daylight value, the large windows and double height spaces provided in each room means that these rooms will feel well daylight. Furthermore, every resident would have access to generous and well daylight shared spaces with east and south-facing aspects.
- 6.7.22 In sunlight terms, all rooms that contain a south-facing window meet the target sunlight value. Given that north-facing windows have restricted access to

sunlight these are also considered good results given that more than half of the rooms meet their target. A development with no north facing rooms would be impracticable given the site constraints and most likely unviable as a result.

6.7.23 There would be 6 north facing bedrooms in Block B and Block A would have bedrooms with a northwest facing window. The large windows and double height spaces would help these rooms feel well daylight but all rooms would have access to dual and triple access communal spaces in the cluster as well as a communal roof terrace, the Tewksbury Yard workspaces, and the yard spaces in the development.

6.7.24 The number of bedspaces support the viability of the scheme and therefore the public benefits such as new homes, commercial spaces, and public realm improvements. On the whole, the proposal would provide a high level of compliance with lux targets and north and northwest facing aspects would be mitigated by large windows and voluminous spaces that would feel well lit, as well as access to dual/triple aspect communal spaces and external amenity.

6.7.25 A condition is recommended which would ensure that there would be a satisfactory internal noise environment for occupiers of the rooms of accommodation by ensuring that the glazing specification and mechanical ventilation would be assessed by the LPA and required to meet British Standards relating to sound insulation and noise reduction.

6.7.26 A recommended condition would also ensure appropriate noise insulation is provided between the accommodation and commercial uses at the lower floor levels.

6.7.27 A further condition is also recommended which would ensure the development is implemented and operated in accordance with an approved Warehouse Living Management Plan which identifies how the building would be managed and maintained.

6.7.28 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.

6.7.29 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.

6.7.30 Noise from the commercial spaces near to the site is not expected to contribute to the overall noise climate of the proposed accommodation given distances

and as this would be less than the ambient noise level associated with road traffic on Seven Sisters Road.

6.7.31 Warehouse Living can be by its very nature messy and noisy and so it is not as noise sensitive as typical C3 residential. In any case it is recommended that further details of the proposed glazing and mechanical ventilation are secured through a recommended planning condition to manage noise in the Warehouse Living areas.

6.7.32 Overall, the quality of accommodation would be high for the intended use and the recommended conditions would ensure that this high standard is secured in perpetuity.

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 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).

Health contribution

- 6.8.6 The NHS London Healthy Urban Development Unit states that to meet the health needs of the new residents of proposed schemes, and to limit adverse impacts on existing residents, developments need to provide financial contributions to ease pressure on GPs by increasing capacity and recruiting clinicians to provide enhanced services.
- 6.8.7 Typically, CIL payments would cover these requests as CIL charges can be directed towards health and wellbeing facilities. However, there is no CIL charge for Warehouse Living developments or for commercial uses such as those proposed.
- 6.8.8 The HUDU Model has been run for this scheme based on 69 additional residents which assumes that a proportion of the people will move locally. The HUDU Model indicates that the scheme generates an overall capital cost of £117,919 with a further revenue cost of £101,171.
- 6.8.9 Discussions with the NHS Trusts and the ICB indicate that expansion of existing sites should be possible and therefore the capital cost of mitigation has been reduced to £65,761 (they do not currently require developers to cover the additional revenue costs).
- 6.8.10 Officers have not sought this contribution due to the viability position of the scheme which has no additional surplus to cover the request. The incorporation of the Tewksbury Yard below ground workshop units in Block A takes up all of the surplus of £464,097. The loss from open market rents on the workshop units would absorb this figure.
- 6.8.11 Provision of dedicated workspace to enhance the Warehouse Living proposed in the upper floors of the blocks is considered to be crucial in ensuring that it meets DMDPD policies DM38 and DM39. If the NHS request was fulfilled then the workspace available to residents would be reduced which would have an impact on the building fulfilling residents space requirements for creative working.

6.9 Transportation, parking, and highway safety

- 6.9.1 The NPPF (Para. 114) 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).
- 6.9.2 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.

- 6.9.3 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.
- 6.9.4 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.
- 6.9.5 DMDPD policy 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.

Transport Assessment

- 6.9.6 The site has a PTAL of 5. The site is located within Green Lanes B CPZ, which restricts parking to permit holders only Monday to Friday 08:00 – 18:30. The application is supported by a Transport Assessment (TA), a draft Delivery and Servicing Plan (DSP), Draft Residential Travel Plan and Outline Construction Logistics Plan.

Car Parking

- 6.9.7 As no direct policy applies to Warehouse Living within the London Plan 2021, Policy T6.1 Residential Parking has been utilised instead. It states that that disabled person's parking should be provided for new residential developments delivering 10 or more units.
- 6.9.8 As a minimum 3% of dwellings must have at least 1 designated disabled persons parking bay from the outset. This Policy further requires that new developments be able to demonstrate as part of a Parking Design and Management Plan, how an additional 7% of dwellings could be provided with 1 designated disabled person's parking space per dwelling in future upon request as soon as the existing provision is insufficient.
- 6.9.9 For development this would equate to 10 disabled bays having to be provided by the developer. However, as this development does not fit within residential

nor student accommodation LBH Transport Planning would require the developer/applicant to provide 3 on-street disabled bays to offset any future demand from this proposal.

6.9.10 These bays can be dedicated to blue badge holders living within the development, and blue badge holders can also park within CPZ and pay and display bays. The low levels of existing parking should mean space being available should demands arise for up to 3 spaces or more.

6.9.11 This would be managed by a Parking Management Plan, linked to the Travel Plan which will identify future demands and trigger any necessary application to the Council.

6.9.12 The applicant will be required to provide three on street blue badge bays. This can be dealt with via way of a parking management plan secured by the S.106 agreement and a S278 process and further comments relating to this are included later in this response.

Future parking demands

6.9.13 Car ownership from the likely demographic at this development would be low, and the low parking stresses recorded on Eade Road mean that parking issues and high stresses are not expected from this proposal.

6.9.14 Given the site has a PTAL of 5, and is located within a CPZ, the proposed level of car parking is acceptable, and accords with Policy DM32 for designation/formalising as a car free development.

6.9.15 Should the development be granted permission the applicant would need to enter into a s106 agreement to formalise this and meet all of the Council's administrative costs (£4000).

Cycle parking

6.9.16 The applicant has proposed to provide 101 long-stay residential cycle spaces on-site, which are based upon 101 bedrooms. These are broken down as follows:

- 32 two-tiered stands = 64 spaces
- 5 Sheffield stands = 10
- 3 enlarged Sheffield stands = 6 spaces
- 21 long-stay spaces within the living space

6.9.17 These long-stay cycle spaces would be stored underneath staircases, against walls and below bed decks, as tends to be the preference of Warehouse Living residents.

6.9.18 6 short-stay cycle spaces would be provided based upon both student and C3 Dwellings. Commercial cycle parking provision would be 4 long-stay and 23 short-stay.

6.9.19 It is stated within the Transport Assessment that all short-stay cycle spaces are to be provided in the public realm. Overall, LBH Transport Planning finds the cycle parking to be satisfactory and in accordance with the London Plan policy T5.

6.9.20 A condition is recommended which would require the applicant to submit details of cycle parking spaces in line with the London Plan and the London Cycle Design Standards (LCDS).

Car Club

6.9.21 The applicant has sought advice from Zipcar with respect to this development proposal. Zipcar have recommended that they would provide a single car at the development, fully managed by themselves.

6.9.22 Furthermore, funding for three years of membership would be provided for each room. LBH Transport Planning require the applicant to enter into a s106 agreement with Haringey Council for them to provide car club facilities in the local vicinity of the location site for the potential occupants of the development.

6.9.23 This would assist with reducing the rate of car ownership from residents of this development and help to offset any potential parking impacts on local residential streets when the CPZ is not in operation. The applicant would be required to provide 3 years car club membership for each residential unit, along with £100 driving credit, which has been already stated within the submitted Transport assessment by Zipcar.

Construction Logistics and Delivery & Servicing

6.9.24 Outline Construction Logistics Plans and Delivery and Servicing plans have been submitted in support of the application. Whilst these documents detail acceptable arrangements, it is recommended that these aspects are conditioned to ensure arrangements relating to these aspects are fully considered and appropriate at the detailed design stage.

Travel Plan

6.9.25 A draft residential Travel Plan is included within the TA. Overall, this is a sound basis for a future worked up Travel Plan process that would be required for the development. The format and proposed content have been found to be acceptable, and it is noted that there is a mode share target of 95% for sustainable/active travel modes. There will be a Travel Plan Monitoring Fee of £3000 per year for the first 5 years of the development and this would be covered by way of a s106 obligation for the development.

Highway works

- 6.9.26 Pedestrian access would be from both Eade Road and Tewkesbury Road. The applicant has proposed the widening of the existing formal right of way/footpath 164 – 165 to improve the quality and environment of this access.
- 6.9.27 The Council's Site Allocations DPD includes sites SA34 and SA35 at this location. The policy document does include within its requirements for these sites to have improved pedestrian permeability, and to provide improved connections from the Warehouse District to Seven Sisters and Amhurst Roads.
- 6.9.28 The existing route is part provided with stairs and is 1.5m wide at the narrowest point. There is a 7.2m level difference between Tewkesbury and the footway along Seven Sisters Road.
- 6.9.29 The applicant is proposing improvements to this route to provide a minimum width of 3m along the footpath. LBH Transport Planning would require the applicant to enter into the necessary highways legal agreements to divert the path and to make the necessary improvements, the scheme would have to be the subject of further detailed design development and would have to be secured by a s278 under the Highways Act.
- 6.9.30 Ultimately, this aspect of the application as proposed/presented is considered a fundamental part of the transportation and highways proposals, and successful implementation of the proposed arrangements would be necessary for the proposals to deliver the stated public benefits.
- 6.9.31 Disability/mobility impaired access has been referenced with this aspect of the development; it is commented that provision of an appropriately graded ramp for the mobility impaired would not be physically possible given the 7.2m level change (a 190m long ramp would be required).
- 6.9.32 The submission also comments that a lift would not be provided, based on installation and maintenance costs along with related concerns of antisocial behaviour.
- 6.9.33 The alternative route suggested for those unable to navigate the stepped replacement route is to progress along the Seven Sisters Road footway, connecting to Tewkesbury Road via Netherton Road, this is detailed as a 220m walk with a gradient.
- 6.9.34 It is unfortunate that this connection cannot be made completely accessible, however, the gradient and alignment make this impossible. The replacement route is only slightly longer than a potential switchback ramp route would be.

6.9.35 The applicant's proposal is to create a shared surface type arrangement to front the northern side of the site at this location. This would have be the subject of further detailed design and approval and would have to be secured as part of a s278 agreement.

Legal Highway Agreements

6.9.36 The proposed works to deliver the public realm and footway improvements from Seven Sisters Road down to Tewksbury Road would need to be the subject of a legal agreement under Section 278 of the Highways Act 1980. This would secure details of the works and how the new footway and public realm would tie in with the existing highways and junctions. The details would include street furniture, materials, lighting, CCTV, and maintenance.

6.9.37 It is recommended that a Grampian condition is attached to any permission given which would ensure the s278 agreement is entered into prior to works commencing and that the approved works are completed prior to occupation of the development.

6.9.38 A further s278 agreement is required for the works to remove the crossover to the site to reinstate the footway and the creation of any on-street disabled car parking bays which require electrification.

6.9.39 Planning conditions are also recommended that require pre- and post-development highway condition surveys, to ensure that footways are restored after development is complete.

Access

6.9.40 The Transport Assessment includes an Active Travel Zone (ATZ) assessment for the site. Five routes have been included within the assessment which included the following destinations/routes:

- Finsbury Park
- Harringay Green Lanes Station and Supermarkets
- Woodbury Wetlands/Reservoir
- Stamford Hill Station and Spring Hill Practice
- Eade Road

6.9.41 Recommendations for improvements to these routes have been suggested, which include widening of the footway, improved street lightning, provision of benches, installation of low-level street planting and trees, tactile paving, and the installation of bins.

6.9.42 Collision data has been sourced which covers a 3-year period from 2018 – 2020 and a 500m radius from the site location. During this period 14 serious collisions were recorded and no fatal collisions. The data submitted only included vulnerable road users who were pedestrians and cyclists. Two of the 14 were on

Eade Road the remainder of the collision occurred on Seven Sisters Road. The developer has not presented any recommendations for improvements to road safety for both pedestrians and cyclists, as they have explained as they believe the low numbers of collisions near the site shows there are no issues with highway safety.

6.9.43 LBH Transport Planning have requested the developer to provide some funding towards the scoping and establishment of improvements to the highway for pedestrians and cyclists as their numbers would increase with the introduction of this development.

6.9.44 However, this is not sufficiently supported by the trip generation, which does show sustainable transport as having the highest trip numbers but does not identify sufficient trips to warrant a contribution of £250,000 towards the feasibility design and consultation for cycle routes. In any case, the viability position would not support further contributions.

6.10 Air Quality

6.10.1 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.

6.10.2 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.

6.10.3 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).

6.10.4 The application is supported by an Air Quality Assessment. The 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 implementation of good practice dust control measures), meaning the site as a whole is considered acceptable for the proposed use.

6.10.5 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 measures recommended by LBH Pollution.

6.11 Energy, Climate Change and Sustainability

- 6.11.1 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).
- 6.11.2 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).
- 6.11.3 London Plan Policy SI2 requires developments referable to the Mayor of London to demonstrate actions undertaken to reduce life-cycle emissions.
- 6.11.4 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).
- 6.11.5 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.
- 6.11.6 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).
- 6.11.7 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.
- 6.11.8 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.
- 6.11.9 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. Policy DM21 of the Development Management Document requires developments to demonstrate sustainable design, layout, and construction techniques.

Energy

- 6.11.10 The principal target is to achieve a reduction in regulated CO₂ emissions over Part L 2021 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.
- 6.11.11 'Be Lean.' The applicant has proposed a saving of 1.9 tCO₂ in carbon emissions (15%) through improved energy efficiency standards in key elements of the build, based on SAP10.2 carbon factors. This would meet the minimum 15% reduction for non-residential development as set in London Plan Policy SI2. However, the development is required to maximise improvement in building fabric parameters as much as possible.
- 6.11.12 'Be Clean.' The applicant is intending to connect to the District Energy Network (DEN) in Woodberry Down. This strategy is acceptable subject to a recommended condition requiring details relating to pipework, network standards, the commercial strategy, connection points, plant room size, layout, and schematics according to the standards.
- 6.11.13 'Be Green.' The applicant has reviewed the installation of various renewable technologies. The report concludes that air source heat pumps (ASHPs) and solar photovoltaic (PV) panels are the most viable options to deliver the Be Green requirement. A total of 3.5 tCO₂ (27%) reduction of emissions are proposed under Be Green measures.
- 6.11.14 Block A and Block B have been identified as suitable for PV installation; however, no Solar PV has been proposed in Block B as a Biodiversity meadow mix has been proposed in this space.
- 6.11.15 The solar array peak output would be 8kWp, which is estimated to produce around 25,500 kWh/year of renewable electricity per year. The solar PV will be installed on the roof of Block A with an area of 131m² oriented south-east and south-west with 35-degree inclination.
- 6.11.16 The PV array is proposed to connect to the landlord electricity distribution and will be monitored with a meter installed in accordance with Building Regulations and the Be Seen energy monitoring guidance. The meter is proposed to be connected to the Building Energy Management System (BEMS) for continuous monitoring of the electricity generated.

- 6.11.17 ‘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.
- 6.11.18 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.
- 6.11.19 The applicant proposes to incorporate energy and smart meters in line with the GLA’s Energy Monitoring Guidance and the sub-metering strategy will be developed during the detailed design stages.
- 6.11.20 A Building Energy Management System (BEMS) is proposed to operate, control, and monitor the mechanical service installation. Comprehensive metering is proposed for performance and load monitoring of the complete systems, with the capacity to monitor individual items of plants, low carbon technologies, and district heating system. This will be secured by condition.
- 6.11.21 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 7.3 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 an agreed sum that may be appropriate in light of additional carbon savings that arise from more detailed design agreed with the LPA, by way of s106 planning obligations.
- 6.11.22 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. The proposed ‘Lean’ savings would meet London Plan Policy SI2 requirements for non-residential developments. Officers are satisfied that the amount of proposed roof top PV arrays have been optimised, given other demands for roof-top space.

Overheating

- 6.11.23 In accordance with the Energy Assessment Guidance, the applicant has undertaken a dynamic thermal modelling assessment in line with CIBSE TM59 with TM49 weather files. The report has modelled 101 bedrooms, 4 living rooms, 4 kitchen and 9 living/kitchen under the London Weather Centre weather files following the cooling hierarchy.

6.11.24 Due to the noise and air quality constraints of this site being adjacent to the busy Seven Sisters Road, the TM59 criteria for predominantly mechanically ventilated dwellings should apply (assuming windows need to remain closed). All rooms and spaces pass the overheating requirements for 2020s DSY1 as a result of restricted window openings, performance glazing, window recesses, brise soleil, set-backs to elevations and balconies, and limited comfort cooling to bedrooms only.

6.11.25 In the interest of reducing the impacts of climate change and mitigation of overheating risk, in accordance with London Plan (2021) Policy SI4, and Local Plan (2017) Policies SP4 and DM21 conditions are recommended that would seek to secure overheating measures in the Warehouse Living and commercial elements of the scheme.

Environmental sustainability

6.11.26 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 110 litres or less per head per day and achieve BREEAM 'Excellent' standard for 'Wat 01' water category or equivalent (commercial development).

6.11.27 Considerate Constructors Scheme. The applicant's Site Construction Management Plan states that. If planning permission were granted, the principal contractor would be required to manage the site and achieve formal certification under the Considerate Constructors Scheme. This would be secured by a s106 planning obligation.

6.11.28 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.

6.12 Urban Greening and Ecology

Urban Greening

6.12.1 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.

6.12.2 It calls on boroughs to develop their own UGF targets, tailored to local circumstances, but recommends an interim target score of 0.3 for predominantly

commercial development and 0.40 for developments that are predominately residential.

- 6.12.3 The development achieves an Urban Greening Factor of 0.35, which is considered acceptable given the hybrid nature of the Warehouse Living use (which is an employment designation).

Ecology

- 6.12.4 London Plan Policy G6 calls for development proposals to manage impacts on biodiversity and to aim to secure net biodiversity gain.

- 6.12.5 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.

- 6.12.6 The applicant's Biodiversity Net Gain Assessment sets out the findings of an extended Phase 1 Habitat Survey, which concluded that the site is largely dominated by hardstanding, with some vegetation that has grown within and through it. This includes a line of trees forming a dense hedgerow separating the steps down through the centre of the site from Eade Road which is dominated by only one conifer species and is assessed as being of poor condition.

- 6.12.7 Of the 0.23 ha covered by the site, it is anticipated that post-development, circa 0.18 ha would comprise hardstanding and buildings (i.e., developed land with a sealed surface) or turfstone (artificial unvegetated, unsealed surface); with the remaining comprising introduced shrubs (herbaceous perennial mix / climbers), rain garden planting, a biodiverse green roof and some areas of species rich lawn turf and wildflower enriched turf, along with 18 additional trees.

- 6.12.8 The Assessment identifies that the site, pre-development comprises only a few habitats, namely hardstanding and sparsely vegetated land. Considering this, the pre-development score for the site is calculated to be 0.10 biodiversity units.

- 6.12.9 The post-development plans for the site include the planting of shrubs, a rain garden, scattered trees, species rich / wildflower turfs and green roofs which accounts for the majority of the post development score.

- 6.12.10 Therefore, the overall score for the site is a gain of 377.76% of the pre-development score (or an increase of 0.38 habitat units). However, there is a - 99.19% loss of hedgerow units given the presence of one predevelopment, and only partial replacement with an ornamental hedge post development.

- 6.12.11 Overall it is considered that this habitat is suitably offset by the additional areas of green roofs, providing a foraging and nesting habitat. It is recommended

that the creation, establishment, and management of the above habitats be included within a Landscape and Ecological Management Plan (LEMP).

6.12.12 It is also recommended that a Biodiversity Audit be carried out at regular points throughout the lifetime of the project, to ensure that the created habitats are performing as was intended. If any remedial actions are proposed, these would be the responsibility of the applicant/developer to implement. This can be covered through the LEMP condition.

6.12.13 The applicant also submitted a Phase 1 Habitat Survey and an ecological scoping survey, which assessed the potential of the site to support species of conservation concern or other species which could present a constraint to the development of the site.

6.12.14 The surveys recommend bat and bird boxes are included within the final design to enhance the site for breeding and mitigate for loss of suitable habitat for these species. The boxes can be affixed to the new building. In addition, opportunities for enhancements include:

- Provision of native species in landscaping schemes including flower-, berry- and fruit-bearing species to enhance the habitat for birds, bats and invertebrates;
- Provision of bee bricks to enhance the habitat for solitary bee species; and
- Night scented flowering plants to encourage foraging bats to use the site post-development.

6.12.15 The above can be secured through recommended conditions.

Habitats Regulation

6.12.16 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").

6.12.17 The application site is approx. 1.7km 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 Lee Valley SPA/Ramsar comprises four underpinning Sites of Special Scientific Interest (SSSIs).

6.12.18 The application site lies approx. 6.3 km west of the Epping Forrest Special Area of Conservation (SAC) at its closest point. As such, it falls outside of the Zone of Influence (ZOI) of 6.2km as defined by Natural England in their Interim Guidance.

6.12.19 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.

6.12.20 Natural England has reviewed the application and has raised no objection. Given 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").

6.12.21 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.

6.13 Trees and landscaping

6.13.1 The NPPF (Para. 136) 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.

6.13.2 The line of trees forming a dense hedgerow separating the steps down through the centre of the site from Eade Road (dominated by only one conifer species) would be removed as part of the proposed works. These trees have little amenity value and are of poor quality and should not be an impediment on development given the mitigation provided by the proposed replacement trees and landscaping.

6.13.3 A condition is recommended which would secure full details of the proposed landscaping details of amenity areas including details of planting plans, written specifications, and implementation programmes, as well as details of all hard surfacing materials and any relevant SUDS features (including management and maintenance proposals), details of all furniture and storage units, and details of all functional services. This would ensure a satisfactory level of amenity, biodiversity enhancement, and boundary treatments are delivered.

6.13.4 As part of the site wide strategy/Masterplan Framework, it is envisaged that the Cotton Mill Yard space would be remodelled in consultation with residents. Key works would include implementation of a wider SUDS strategy, provision of replacement and new cycle spaces and new refuse storage, lighting and seating, and ecological enhancements.

6.13.5 Given the need to work with residents on the design of this space, it is recommended that the final design and delivery of this space is controlled via a

specific condition that would ensure consultation is carried out and sufficient landscaping and trees are delivered.

6.14 Wind and Microclimate

6.14.1 London Plan Policy D8 seeks to ensure that public realm areas are well-designed, including, ensuring that microclimate considerations such as wind is considered to encourage people to spend time in a place. London Plan Policy D9 calls for proposed tall buildings to carefully consider wind and other microclimate issues. Policy DM6 states that proposals for tall buildings should consider the impact on microclimate.

6.14.2 A Pedestrian Wind Comfort and Safety report was submitted in support of the application. The report concluded that the likely impact of the proposed development in all areas of the public realm is such that the wind microclimate is likely to remain as being suitable for the planned pedestrian uses and no specific wind mitigation measures are required in this regard.

6.14.3 The assessment also showed that the ground level wind microclimate in the proposed site conditions is likely to remain safe for all users and no specific wind mitigation measures are required in this regard.

6.14.4 This report was subject to an independent peer review which found that the assessment represented a plausible appraisal of the wind microclimate upon the introduction of the proposed development. The peer review initially raised a few minor points of clarification but stated that these were not expected to materially impact the conclusions of the report, or suitability of wind conditions reported which were considered to be robust.

6.14.5 A response was provided to all points of clarification raised by the peer reviewer. The majority of these responses were accepted and required no further comment. However, the applicant offered to provide an assessment of the terraces along with their layout and balustrade design during the detailed design stage following any grant of planning permission.

6.14.6 In order to ensure suitable wind conditions would be readily achieved, the layout, balustrading and detailed design of the terraces accompanied by a wind comfort and safety report that affirms what is proposed would be required by condition.

6.15 Flood Risk and Drainage

6.15.1 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 River Lea, which is located approximately 850m to the northeast of the site. The New River water transfer structure is located approximately 80m to the south/southwest of the

site. The submitted Flood Risk Assessment (FRA) considers flooding from fluvial, tidal, pluvial, groundwater and from sewers also to be low.

- 6.15.2 The site falls within a Critical drainage Area (CDA). The development has therefore proposed Sustainable drainage systems (SuDS) to manage surface water discharge from the development. The SuDS proposed include blue/green roofs, rain gardens, and an attenuation tank to provide pollution mitigation for the discharged flows.
- 6.15.3 The proposed SuDS would restrict discharge from the development to 1.0l/s which would be a significant reduction on existing rates for the area. Attenuation storage would accommodate all rainfall events up to and including a 1-in-100-year event with a 40% climate change allowance.
- 6.15.4 The Lead Local Flood Authority are generally content with the overall methodology used within the report submitted in support of the application, subject to a recommended condition requiring a Surface Water Drainage Strategy and an associated management and maintenance plan to be submitted for approval with the approved strategy then delivered and retained thereafter.
- 6.15.5 With the recommended conditions attached the proposal would meet the requirements for development within Critical Drainage Areas and comply with policy DM26 and London Plan SI3 (which aims to achieve greenfield rates).

6.16 Waste and Recycling

- 6.16.1 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.
- 6.16.2 An Operational Waste Management Strategy has been submitted in support of the application which has been reviewed by The Council's Waste and Street Cleansing team. The waste team find the calculations that have been applied to the numbers of bins and waste streams to be proportionate and agree with the quantities allocated based on the applied rationale.
- 6.16.3 To ensure that the proposal delivers on the conclusions of the Operational Waste Management Strategy conditions are recommended that would require commercial and Warehouse Living waste plans to be submitted for approval which would ensure sufficient storage is provided and maintained.

6.17 Land Contamination

- 6.17.1 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.
- 6.17.2 The applicant's Phase I Desk Study reports on an initial Conceptual Site Model (CSM) and a Preliminary Risk Assessment (PRA) – taking account of ground conditions and the current and previous uses of the site. It concludes by identifying Low to Moderate potential risks to a range of receptors, including to controlled waters, sensitive ecology, flora and fauna, and site end users.
- 6.17.3 It recommends that a ground investigation is carried out for geo-environmental purposes to enable a refinement of the CSM and geo-environmental assessments for the identified unacceptable risks with respect to human health and buildings / structures (property). The investigation should include an assessment of the risk from sulphate 'attack' to foundations and ground gas and vapour monitoring.
- 6.17.4 LBH Pollution officers raise no objection to the proposals, subject to standard conditions on Land Contamination and Unexpected Contamination.

6.18 Below Ground Development

- 6.18.1 The proposal does not include a basement but because of the topography of the site and the existence of the steep slope, built form is proposed below the Seven Sisters ground level that may require excavation support (e.g. use of temporary propping), condition surveys, and monitoring.
- 6.18.2 It is recommended that a detailed survey is undertaken by a suitably qualified structural engineer in order to determine the structural nature and condition of the surrounding land and buildings and infrastructure which have the potential of being impacted by the proposed works.
- 6.18.3 This can be secured by condition. The recommended condition shall also require submission of a method statement to ensure that the works are delivered whilst safeguarding the structural integrity of neighbouring structures.
- 6.18.4 Moreover, the condition of nearby buildings shall be monitored throughout the construction process and works shall cease immediately if damage in excess of acceptable impacts are recorded. A post-completion condition survey of nearby buildings shall be submitted to and approved in writing by the Local Planning Authority within 6 months of the completion of the works.

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 policy DM9 of the DM DPD.
- 6.19.3 An Archaeological desk-based assessment has been submitted in support of the application.
- 6.19.4 The Greater London Archaeology Advisory Service (GLAAS) conclude that the proposal is unlikely to have a significant effect on heritage assets of archaeological interest. In view of the scale of the impacts and the likely impacts of past quarrying and landfill in the area, they do not advise archaeological investigation in relation to this scheme. No further assessment or conditions are therefore necessary.

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 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. 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 requirements of the Building Regulations.
- 6.20.3 The application is supported by a Fire Statement that meets the requirements of London Plan Policy D12 (A). The application has been the subject to a Gateway 1 consultation with the Health and Safety Executive.
- 6.20.4 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.

6.20.5 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.

6.20.6 It is recommended that, in accordance with the Mayor of London's draft guidance (Fire Safety Feb 2022), a planning condition is attached to any permission requiring the development to be carried out in accordance with the planning fire safety strategy (included in the Fire Statement).

6.20.7 An informative is also recommended which advises the applicant that if there are any changes to the scheme which require subsequent applications following the grant of any planning permission, an amended Fire Statement should also be submitted which incorporates the proposed scheme amendments so that the content of the Fire Statement always remains consistent with the latest scheme proposals.

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 Warehouse District including commercial space and 101 Warehouse Living bedspaces. 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 40 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. 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 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 the London Plan and local planning policy requirements.

6.22 Conclusion

6.22.1 The principle of new Warehouse Living development is supported as the scheme meets key requirements of policies DM38, DM39 as well as Site Allocation SA34.

The proposals would increase employment floorspace and the submission of a Masterplan Framework identifies how the proposal would provide for the needs of residents and fit in with future development within other parts of the allocation.

6.22.2 Warehouse Living is by its nature and provides workspace within the living space the combination of workspaces and accommodation cuts costs by avoiding the need for residents to have to rent both a home/room as well as a space to work. A late-stage review would secure a contribution to affordable housing if rents exceed those set out in the viability report when any increase in costs is accounted for. The rents would be monitored over time to inform any future proposals for Warehouse living.

6.22.3 The proposed development would not cause unacceptable harm to the amenity of surrounding residential properties. The proposal provides a unique high-quality design that acts as a positive gateway to the Warehouse District and responds to the QRP comments and satisfies Local Plan and London Plan requirements.

6.22.4 The overall quality of the proposed Warehouse Living accommodation is good will meet the host community's future accommodation needs for creative living and working. The proposed scheme would preserve nearby listed buildings and their setting and the character and appearance of nearby conservation areas. The proposal would have a minor impact on views of medium value from Vartry Road on locally listed building Woodberry Down Baptist Church the resultant harm falls in the less than substantial category. The proposal incorporates several sustainability measures and satisfies relevant London Plan Policies.

6.22.5 All other relevant policies and considerations, including equalities, have been considered when making the recommendation. Section 149 of the Equality Act 2010 created the public sector equality duty. Section 149 states:

- 1) A public authority must, in the exercise of its functions, have due regard to the need to:
 - a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
 - b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
 - c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

Officers have taken this into account and given due regard to this statutory duty, and the matters specified in Section 149 of the Equality Act 2010 in the determination of this application. There are no known equality implications arising directly from this development.

6.22.6 Planning permission should be granted for the reasons set out above. The details of the decision are set out in the RECOMMENDATION under section 8.0.

7.0 COMMUNITY INFRASTRUCTURE LEVY (CIL)

There is no Haringey CIL charge for Warehouse Living development or the other uses proposed. The development would be liable to pay the Mayor's CIL at £60 per sqm.

8.0 RECOMMENDATION

That the Committee resolve to GRANT PLANNING PERMISSION and that the Head of Development Management or the Assistant Director Planning, Building Standards & Sustainability is authorised to issue the planning permission and impose conditions and informatives subject to the Mayor's Stage 2 response and the signing of a section 106 Legal Agreement.