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Planning and Heritage Statement

807 High Road,
Tottenham

FEBRUARY 2024

Q230777

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1 Introduction

1.1 This Planning and Heritage Statement supports an application for full planning permission for the demolition of all existing buildings at 807 High Road, Tottenham ('the Site'), and the erection of a replacement building providing 25no. purpose-built student accommodation (PBSA) units (Use Class Sui Generis), together with a ground floor flexible retail unit (Class E) and other associated works ('the Proposed Development').

1.2 This application has been submitted on behalf of High Road West (Tottenham) Ltd ('the Applicant').

1.3 The description of the development as proposed is as follows:

"Full planning application for the demolition of existing buildings and the erection of a replacement building of up four storeys to include purpose-built student accommodation (Sui Generis) and flexible commercial, business and service uses (Class E), hard and soft landscaping, and associated works."

1.4 The principle of the Site's redevelopment is already established by an extant planning permission (ref. HGY/2021/0441) for a residential-led development. This consented the demolition of all existing buildings and the Site's redevelopment for a scheme of a largely identical scale and massing to that now proposed.

1.5 The Proposed Development would continue to deliver an efficient use of previously developed land, according with the relevant policies of the Development Plan and other material considerations. It responds positively to the character and setting of both the Site and wider historic environment, and there are considerable public and wider planning benefits that weigh in favour of the application, including:

- The Site's regeneration responds positively to Haringey's housing needs in a highly sustainable location, delivering 25 student beds (equating to 10 "standard" homes as per the London Plan equivalent).
- The proposals accord with the strategic principles of Site Allocation NT5 and the High Road West Masterplan Framework – these support the uses proposed and seek to enhance the High Road frontage in this location. The scheme would complement the future regeneration of NT5 and would not prejudice this in any way.
- The scheme would complement the ongoing regeneration of Tottenham that has taken place to the east, notably within the Northumberland Development Project (NDP) and Northumberland Terrace.
- A supporting, flexible Class E use would add vitality and active frontage to the High Road, supporting new employment opportunities and complementing the wider student use.
- The Site's contribution to the character and appearance of the Conservation Area would be significantly enhanced through high-quality design.

- New local employment opportunities would be created during the construction and operational phases. Further economic benefits would arise through student expenditure spending in the local area, alongside wider S106 and Community Infrastructure Levy (CIL payments).
- The buildings will greatly improve the Site's sustainability credentials and energy efficiency – zero carbon would be achieved through the use of on-site measures and financial offset payments; a minimum of BREEAM 'Very Good' would be attained by the commercial units; an onsite reduction in regulated emissions, and future potential connection to an emerging District Energy Network would be facilitated.

1.6 The remainder of this statement is structured as follows:

- **Section 2** outlines the relevant planning background and factual context of the Site. It includes a proportionate assessment the heritage significance and interest of the North Tottenham Conservation Area within which the Site sits.
- **Section 3** provides a summary of the pre-application engagement undertaken.
- **Section 4** describes the development proposals.
- **Section 5** explains the planning policy and legislative framework relevant to the consideration of the application.
- **Section 6** considers the relevant planning policy and material considerations.
- **Section 7** summaries Section 106 (S106) and Community Infrastructure Levy (CIL) matters.
- **Section 8** sets out the overarching conclusions and the planning balance.

1.7 The application accords with an up to date Development Plan and there are no other material considerations that would preclude the development from coming forward. The scheme achieves sustainable development for which national policy applies a presumption in favour.

2 Site Context

Site and Surroundings

- 2.1 The Site forms part of a terrace of late 19th/early 20th century buildings along the west of High Road, Tottenham. Buildings within the terrace are between 2.5 to 4 storeys in height, being of brick construction with predominately two/four bay fenestrations above ground floor shopfronts.
- 2.2 Adjacent buildings are of a higher quality than No. 807 High Road, featuring traditional fenestration features (shopfronts and brick detailing). The Site is immediately bound by Nos. 809/811 to its north, and Nos. 803/805 to its south. To the front (east) of the building on the High Road pavement are two existing Sheffield-type parking stands, offering space for four cycles to park.
- 2.3 To the north of 809/811 High Road is Percival Court, an access off the High Road which enters onto a small courtyard and is used for informal parking associated with surrounding properties. The Site wraps around the rear of No. 809/811 to meet with Percival Court in its north-west corner.
- 2.4 The existing building is in poor condition and has been altered unsympathetically during the 20th Century. The building has non-traditional windows, modern dormers with UPVC windows and a rendered ground floor frontage with external security shutters.
- 2.5 At ground floor the existing building was last used on an ad hoc basis by Tottenham Hotspur Football Club (THFC) for training purposes for match day staff and also for storage. Above ground level there are two blocks. The main block fronting High Road over first and second floors which lies vacant, and a second block fronting Percival Court arranged as residential use but also currently vacant. It is understood that the Site was used as a nightclub prior to its current configuration.
- 2.6 Immediately opposite the Site on the eastern side of the High Road lies the Northumberland Terrace, which is one of the most important heritage assets within the North Tottenham Conservation Area by virtue of both the statutorily and locally listed buildings within it, as well as its complete terrace form. The Applicant are in the process of the phased regeneration of this asset.
- 2.7 To the south of Northumberland Terrace lies the Club's new Stadium. The Site is within a highly sustainable location, with excellent access to public transport links, key services and amenities.

Site Designations

- 2.8 Within the adopted Development Plan (see Section 5), the Site is subject to the following designations:
 - Site Allocation 'NT5' (High Road West), proposed for major mixed-use development.

- The Tottenham High Road Local Shopping Centre.
- North Tottenham Growth Area.
- North Tottenham Conservation Area (High Road West).
- An Archaeological Priority Area.
- A Critical Drainage Area.

2.9 Site Allocation NT5 is underpinned by the High Road West Masterplan Framework (HRWMF), and the wider area is therefore subject to significant ongoing transformation. Indeed, the Site lies within an area explicitly identified by the Council for regeneration.

2.10 Further consideration of the design principles of the HRWMF are considered within the accompanying Design and Access Statement.

2.11 The Site does not include any statutory or locally listed buildings. It adjoins locally listed buildings on either side within the terrace at No. 809/811 (north) and No. 803/805 (south) High Road. The nearest statutory listed buildings are 819/821 High Road (Grade II) further north, and 797/799 High Road (Grade II) further south.

2.12 Most of the Site lies within Flood Zone 1, being an area at the lowest risk of flooding. A small part of its eastern extent falls within Flood Zone 2.

2.13 There are no further statutory or environmental designations applicable.

2.14 The Site has a Public Transport Accessibility Rating (PTAL) of 5.

Relevant Planning History

2.15 Full planning consent was granted at the Site in September 2021 (ref. HGY/2021/0441) for the demolition of all existing buildings and the erection of a replacement building of up to four storeys. The scheme included residential (9 units), a retail unit at ground floor (Class E) and a flexible medical, health and/or office use (Class E) at first floor.

2.16 This consent establishes the appropriateness in principle of up to four storeys in height at the Site, alongside recognising the benefits to the Conservation Area's overall appearance which arise from the design enhancements to the High Road frontage. The Applicant have begun to discharge the pre-commencement conditions.; however, they are now proposing a PBSA-led scheme in response to market interest.

2.17 Further north of the Site at 819-829 High Road, the Club have recently secured consent for the "Printworks", a PBSA-led scheme of 287 units (ref. HGY/2023/2306). In a similar manner to the enclosed application, the Printworks also benefits from a prior planning permission for residential-led development (ref. HGY/2021/2283). The PBSA scheme retained the approved design principles which were supported by the Council.

- 2.18 In August 2021, the Council and their development partner (Lend Lease) secured a hybrid planning consent for the entirety of Site Allocation NT5 which could deliver up to 2,869 new homes, commercial uses and public realm (ref. HGY/2021/3175). Whilst the majority of the 807 High Road site falls outside of the Lend Lease application boundary, there is a small degree of overlap in the north-west corner and along Percival Court.
- 2.19 Except for a detailed first phase, the Lend Lease consent is approved in outline form including the area surrounding the Site. This is informed by a broad range of development parameters relating to building plots, height, scale, massing and use, amongst others. It was consented in full knowledge of the extant planning consent for 807 High Road (HGY/2021/0441) and is sufficiently flexible in its parameters to ensure full compatibility with the emerging scheme. This position replicates that which applies to the Printworks consent, in addition.

North Tottenham Conservation Area – Summary of Heritage Significance

- 2.20 The National Planning Policy Framework (NPPF) requires that any applications affecting designation heritage assets must describe the significance of the relevant heritage assets, including any contribution made by their setting (Para. 200). The level of detail must only be proportionate to the proposals themselves, and to understand the potential impact of a scheme on their significance.
- 2.21 The principal heritage asset in this case is the North Tottenham Conservation Area (NTCA). The Site also adjoins locally listed buildings to its north and south, with several statutory and locally listed buildings within the surrounding area.
- 2.22 The requirements of NPPF Paragraph 200 are addressed below.

North Tottenham Conservation Area – Appraisal and Management Plan

- 2.23 The NTCA (designated March 1972 and amended 2017) comprises the area around the junctions of White Hart Lane, Northumberland Park and the High Road. The Appraisal and Management Plan summarises the special interest of this heritage asset as follows:

“Tottenham High Road Conservation Area is notable for preserving, until very recently, an almost intact 19th century townscape incorporating notable surviving examples of earlier periods, while its hinterland (the areas immediately to its east and west) has changed dramatically” (Para. 1.2.1).”

- 2.24 The Site is surrounded by a number of statutorily and locally listed properties, including two locally listed buildings that adjoin it to the north (809-811) and south (805) of High Road. These properties form part of a sequence of 18th and 19th century buildings, including the Site, with double-pitched mansard roofs.
- 2.25 Further south lies the Grade II listed 797-799 High Road which is an early 19th Century, three storey property constructed of red brick with stone-coped parapet. Further north lies 819/821 High Road which is an early 18th Century property with subsequently alterations, again of three storeys in height. Further listed properties lie on the eastern side of the High Road, opposite the Site.

- 2.26 The Site (alongside the surrounding listed properties) lie within 'Character Sub-Area A' which is considered the best-preserved and architecturally most diverse part of the Conservation Area, containing a sequence of buildings that reflect changing patterns of development from the early/mid-18th century through the 19th and 20th centuries.
- 2.27 These buildings, whilst of various ages, contribute to a cohesive and contained streetscape that is considered to have a definite sense of place. The Appraisal and Management Plan states that this is, in part, due to the general conformity in scale, height and materials (mostly brick) and the variation in silhouette or roofline (Para. 1.5.14).
- 2.28 In summary, the Appraisal and Management Plan notes the following regarding the NTCA and those buildings surrounding the Site:
- The NTCA is notable for preserving a 19th century townscape, incorporating notable surviving examples of earlier periods.
 - The townscape of the High Road retains a high degree of historical continuity, maintaining a contained linear street pattern along the High Road.
 - There are good surviving examples of buildings dating from the 18th and 19th centuries.
 - Whilst of varying ages, the buildings contribute to a cohesive and contained streetscape that has a definite 'sense of place' despite the effects of the wide carriageway and density of road traffic.
 - Boundary treatments make an important contribution.
 - 807 High Road is considered to make both a positive and neutral contribution.
- 2.29 In regard to the final bullet point above, the Officer's Committee Report from application HGY/2021/0441 confirmed that the frontage of the existing building is considered as making a neutral contribution to the character and appearance of the Conservation Area (paragraph 4.5).

Historic England: Tottenham High Road Historic Corridor (Case Study)

- 2.30 The '*Tottenham High Road Historic Corridor*' is a collective term for five conservation areas, including the North Tottenham Conservation Area¹ within which the Site sits. The Historic England case study² provides a further summary of the character and special interest of the NTCA, and notes the following:

¹ The five Conservation Areas forming the *Tottenham High Road Historic Corridor* are: (i) North Tottenham; (ii) Scotland Green; (iii) Bruce Grove; (iv) Tottenham Green; and (v) Seven Sisters/Page Green.

² <https://historicengland.org.uk/content/heritage-counts/pub/2017/case-study-tottenham-high-road-historic-corridor-conservation-area-pdf/>

“Most of the High Road is lined with commercial premises and is, therefore, generally characterised by intensively developed, high-density urban environments. This built up frontage is interrupted by a string of historically significant isolated open spaces at Scotland Green, Tottenham Green and Pages Green, and clusters of larger institutional, educational and religious buildings. There are good surviving examples of buildings dating from the 18th and 19th centuries including outstanding groups of Georgian houses and mid to late Victorian shopping parades illustrating the changes to this building type in scale and style, together with examples of the inter-war style of the mid-20th century. The roads flanking the High Road are lined with residential properties and are generally characterised by a more finely grained, domestic scale and a greater degree of uniformity.”

2.31 Historic England go on to highlight the following pressures and issues that prevail:

“... the area has experienced a perceivable decline in both industrial and retail economy [...] to one of the most deprived areas of England. The general economic deprivation of the area has led to several heritage assets being neglected, with poor or no maintenance, as well as proliferation of clutter and loss of architectural details. The riots of 2011 triggered an even greater need to respond to these challenges through a wider and comprehensive regeneration framework.”

2.32 In response to these challenges, Historic England acknowledge the regeneration framework and how a core objective of this is for regeneration to coexist with the wider conservation of the heritage assets:

“The Historic Corridor forms an integral part of the wider framework of growth for the area. The historic fabric of Tottenham is considered an asset which can anchor the character of the proposed new quarters and regeneration schemes in deep historical roots [...] On the other hand, the investment would help improve the character and appearance of the heritage assets in accordance with statutory and national policy requirements.”

Track Record

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

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

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

- 2.36 The Club have also successfully restored the Grade II* listed Percy House (796 High Road) to house the Tottenham Hotspur Foundation providing an exemplar example of heritage regeneration in this part of Tottenham, alongside the restoration of the Grade II listed Warmington House (744 High Road) which was removed from Historic England's Heritage at Risk register following the Club's interventions.
- 2.37 At 500 White Hart Lane, the Club successfully delivered a residential-led scheme of 145 new homes (including 29 affordable homes) alongside supporting employment floorspace. Prior to this, they also delivered Berland Court (ref. HGY/2008/2220) which included 34 new affordable homes.
- 2.38 Immediately north-west of the stadium at Nos. 790-814 High Road, the Applicant has adopted a comprehensive approach to the repair and restoration of the historic 'Northumberland Terrace'.
- 2.39 The first phase of this regeneration – the Paxton development³ – has been constructed and is now operational, providing the immediate interface between the stadium and the Northumberland Terrace, and comprising a new multi-functional building for ticket sales, retail and administrative uses alongside a high-quality public realm. Phase 2 restored the external envelope of Nos. 790-794 High Road, removing poor quality rear extensions to better reveal the heritage significance of the buildings.
- 2.40 The Applicant will continue to deliver the remaining regeneration phases of the Northumberland Terrace. Phase 3 was approved by the LBH in April 2021⁴, proposing a new 'Cultural Quarter' alongside restoration of the listed properties at Nos. 798-814 High Road and land to their rear (east). The final phase (Phase 4) is still being developed but will comprise the renovation of Nos. 790 (Grade II*), 792 (Grade II) and 794 (Grade II) High Road. Planning permission and LBC have been secured in respect of 792-794 to enable occupation by the Sarabande Foundation, a learning arts and cultural organisation and creative business accelerator (refs. HGY/2022/1658 & HGY/2022/1659).
- 2.41 Wider consents have been secured for the Printworks, Goods Yard and Depot sites, in addition.
- 2.42 Collectively, the above schemes have (and will continue to) transform the area and represent a significant investment by the Applicant into Tottenham. To date, this has included over 2,800 new jobs (FTE); the London Academy of Excellence Tottenham, which is the Sunday Times Schools Guide 2021 Sixth Form College of the Year; Brook House Primary School, which is now Ofsted 'Good' and heavily oversubscribed; bringing the NFL to Tottenham; a new leisure and recreational attraction with the 'SkyWalk' visitor experience; and c. 400 new homes, including 285 affordable, with planning permission secured for a further 1,230 homes.

³ Approved under planning and LBC references HGY/2016/3310 & HGY/2016/3540 (as amended).

⁴ HGY/2020/1548 & HGY/2020/1586, approved 9 April 2021.

Summary

- 2.43 The Site is within a highly sustainable and accessible location, within walking distance of a wide range of services and amenities. Excellent public transport links provide regular and sustainable transport services.
- 2.44 It's contribution to the Local Shopping Centre is limited - is underutilised and does not currently make a positive contribution to the character, vitality or viability of the area.
- 2.45 The existing buildings on-site are of poor quality, with development to the rear being delivered in piecemeal fashion. In this respect, the Site does not complement nearby buildings which contain more attractive traditional features.
- 2.46 An assessment of the significance of the North Tottenham Conservation Area has been provided above. A further consideration of the heritage impacts of the proposals is outlined within Section 6 of this Report.
- 2.47 The proposals offer an important regeneration opportunity to deliver an efficient use of the Site, maximising its contribution to the local centre's function, vitality and viability, whilst delivering new residential accommodation. This, alongside the poor condition of existing buildings on-site and the Site's planning history (where demolition and rebuilding were approved), make the Site highly suitable for redevelopment.

3 Pre-application Engagement (Including Statement of Community Involvement)

- 3.1 The Site benefits from an extant planning permission for its redevelopment. The enclosed proposals retain the overarching design principles in so far as this is possible, working closely with the established building parameters (including the consented heights and footprints) and approach to external appearance.
- 3.2 The Proposed Development is therefore a continued design evolution of the extant scheme, rather than something fundamentally new. The principle changes relate to the alternative form of residential use proposed alongside minor design adjustments.
- 3.3 The extant consent (HGY/2021/0441) was subject to a considerable level of community and stakeholder engagement, with the scheme evolving in response to these. Full details are outlined within the submission documents to the application, including explaining how the scheme was modified through this process.
- 3.4 In summary of the prior engagement undertaken for the extant consent, it comprised:
- Two pre-application meetings with the Council, including planning, design, heritage and sustainability.
 - Presentation to the Haringey Quality Review Panel (QRP) on 6 November 2019.
 - Pre-application presentation to the LBH Planning Sub-Committee on 10 February 2020.
 - Engagement with key stakeholders and officers as part of the preparation of technical assessments.
 - Presentation to the Tottenham Hotspur FC Business and Community Liaison Group on 18 February 2020.
 - Consultation with the Metropolitan Police Service (Secured by Design).
- 3.5 Given the evolution of the scheme from the extant consent and the retention of the overarching design principles and approach, the above engagement remains entirely relevant to the enclosed application.
- 3.6 To support this, the Applicant has presented the revised proposals to the BCLG on the 13th February 2023 with the presentation subsequently circulated to those who attended alongside the wider BCLG Group. The presentation was positively received.
- 3.7 One pre-application meeting was also held with the Council's planning and design Officers on 19th January 2024 whereby the scheme was supported in principle and some minor comments were made in respect of the ground floor amenity space layout and frontage to Percival Court.

- 3.8 In response, the scheme was modified in response to the above comments by rearranging the internal configuration of the ground floor to allow the student amenity space to front Percival Court in its entirety. The location of the access to Block B off Percival Court was also moved further to the west of the elevation to facilitate the extension of the amenity space along the frontage. The result of these changes is an improvement to the natural light that will reach the amenity space, making it a more attractive and enjoyable space to use.

4 The Proposed Development

- 4.1 This application seeks full planning permission under the Town and Country Planning Act 1990 for the following works:
- Demolition of existing buildings at the Site in their entirety.
 - The erection of a replacement building of up to four storeys split across two principal blocks - the front (High Road) block ("Block A") is to provide a flexible ground floor commercial unit (Use Class E), with 8 PBSA units above (Use Class Sui Generis); the rear block ("Block B") is to provide a further 17 PBSA units (Use Class Sui Generis) with associated amenity area and cycle storage.
 - Associated landscaping and access, including the provision of a residential amenity podium between the two blocks.
- 4.2 The key elements of the scheme are summarised below. This should be read alongside the documentation submitted in support of the application, particularly the Design and Access Statement, which explains the design proposals in further detail.

Proposed Use

PBSA

- 4.3 8no. PBSA units would be located within Block A, with a further 17 PBSA units located in Block B. In summary the mix of units would comprise of 8no. Premium Suites including 3no. M4(3) compliant units, 15no. Standard Suites and 2no. en-suite bedrooms with associated shared kitchen.
- 4.4 **Table 4.1** below provides a summary of the proposed units.

Table 4.1: Proposed Schedule of Accommodation

Unit	Block	Floor	Type	Area (GIA) sqm	Accessibility
S1	A	1	Standard Studio	19.0	M4(2)
S2	A	1	Standard Studio	20.3	M4(2)
S3	A	1	Standard Studio	18.1	M4(2)
S4	A	2	Standard Studio	18.9	M4(2)
S5	A	2	Standard Studio	20.2	M4(2)
S6	A	2	Standard Studio	18.1	M4(2)
R1	A	3	En-suite Bedroom	15.3	M4(2)
R2	A	3	En-suite Bedroom	15.2	M4(2)
S7	B	1	Standard Studio	18.0	M4(2)
S8	B	1	Premium Studio	24.0	M4(2)
S9	B	1	Standard Studio	18.5	M4(2)
S10	B	1	Standard Studio	18.4	M4(2)
S11	B	1	Premium Studio	24.0	M4(2)

Unit	Block	Floor	Type	Area (GIA) sqm	Accessibility
S12	B	1	Premium Studio	24.6	M4(3)
S13	B	2	Premium Studio	25.0	M4(2)
S14	B	2	Premium Studio	25.1	M4(2)
S15	B	2	Standard Studio	18.1	M4(2)
S16	B	2	Standard Studio	18.4	M4(2)
S17	B	2	Premium Studio	24.0	M4(2)
S18	B	2	Premium Studio	24.6	M4(3)
S19	B	3	Standard Studio	20.6	M4(2)
S20	B	3	Premium Studio	24.0	M4(3)
S21	B	3	Standard Studio	18.2	M4(2)
S22	B	3	Standard Studio	18.0	M4(2)
S23	B	3	Standard Studio	18.0	M4(2)
Total				506.6	M4(3): 3 (12%) M4(2): 22 (88%)

4.5 A student amenity space is located at ground floor level measuring 49.7sqm together with cycle storage and laundry/shower facilities. This has a direct frontage to Percival Court to allow the penetration of natural daylight.

4.6 Block A is accessed directly from High Road, with access to Block B being taken from Percival Court to the North.

Commercial

4.7 One commercial retail unit (Use Class E) will be provided at the ground floor level of Block A. The unit (including associated back of house areas) will have a GIA of 165.5sqm and will be directly accessed of High Road with an additional rear access off Percival Court for vehicle, cycle and bin access.

Design Approach

4.8 As with the previous design, the Proposed Development has been developed to:

- Make efficient use of the Site, capitalising on the area's good accessibility and highly sustainable location.
- Deliver high-quality, sustainable design that uses contemporary, sensitive and integrated architecture and development form.
- Provide a sympathetic fenestration and roofscape that respects local views and heritage assets.

4.9 Building materials have been selected to create a solid, robust building which is responsive to the historic context of the nearby listed and locally listed buildings and the broader conservation area as well as being low maintenance and having a long service life. This includes the use of buff facing brick with red brick detailing, as well as slate roof tiles.

4.10 The design and external appearance of the of the Proposed Development is highly comparable to that as previously approved under application HGY/2021/0441.

Landscaping

- 4.11 A central landscaped podium is provided between the two blocks, providing dedicated amenity space for residents. This provides a further 169.3sqm of open/amenity space at podium level between Blocks A and B.
- 4.12 Landscaping treatment of this area comprises a combination of hard and soft treatments, balancing durability and function with the desire to create a high-quality space in visual terms. A mix of soft landscaping treatments will be incorporated that are low maintenance, alongside durable hard landscaping and residential seating areas.

Access and Servicing

- 4.13 Two separate access will be provided to the PBSA elements of the Proposed Development with Block A being principally accessed directly from High Road, and Block B principally being accessed via Percival Court. The scheme does, however, allow internal access between the blocks with both being accessible from the High Road and/or Percival Court.
- 4.14 The proposed commercial unit will have its own dedicated access directly from the High Road frontage.
- 4.15 Three of the PBSA units (12%) will be accessible to M4(3) standards, with all other units being to standard M4(2). The amenity and open spaces will include level access to ensure access for all users.
- 4.16 Dedicated communal refuse areas are provided at ground floor level for student and commercial uses, which will include both waste storage and recycling bins. These will be collected weekly via Percival Court.

Cycle and Car Parking

- 4.17 A car free development is proposed for the PBSA element of the proposal.
- 4.18 **Table 4.2** below provides a summary of the cycle parking facilities proposed.

Table 4.2: Proposed Cycle Provision

Use	Long-Stay	Short-Stay	Total
PBSA	19	1	20
Class E	2	6	8
Total	21	7	28

- 4.19 Of the above outlined cycle storage provision, 20 of the spaces would be enclosed within a covered cycle store accessible from Percival Court within the ground floor of Block B. Of the remaining spaces, four would be accessed externally on Percival Court and would be used for short stay associated with the commercial unit, and a further long-stay space for the commercial unit would be located within a secure access off Percival Court.
- 4.20 Further justification for the cycle parking strategy is outlined with the Transport Statement submitted in support of this application.

Sustainability

- 4.21 The Proposed Development has been designed to achieve the highest of environmental performance standards following the Energy Hierarchy as set out in the London Plan. The development would achieve zero carbon requirements through a combination of on-site measures and commuted offset payments.
- 4.22 The scheme is designed to connect to a potential future District Energy Network (DEN), with an alternative energy solution incorporated in the event that the DEN is not forthcoming.
- 4.23 The retail space would achieve a minimum of BREEAM 'Very Good' in line with policy requirements.

5 Planning Policy and Legislative Framework

- 5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 5.2 This section sets out a summary of the key material considerations contained within the Development Plan and other relevant documents.

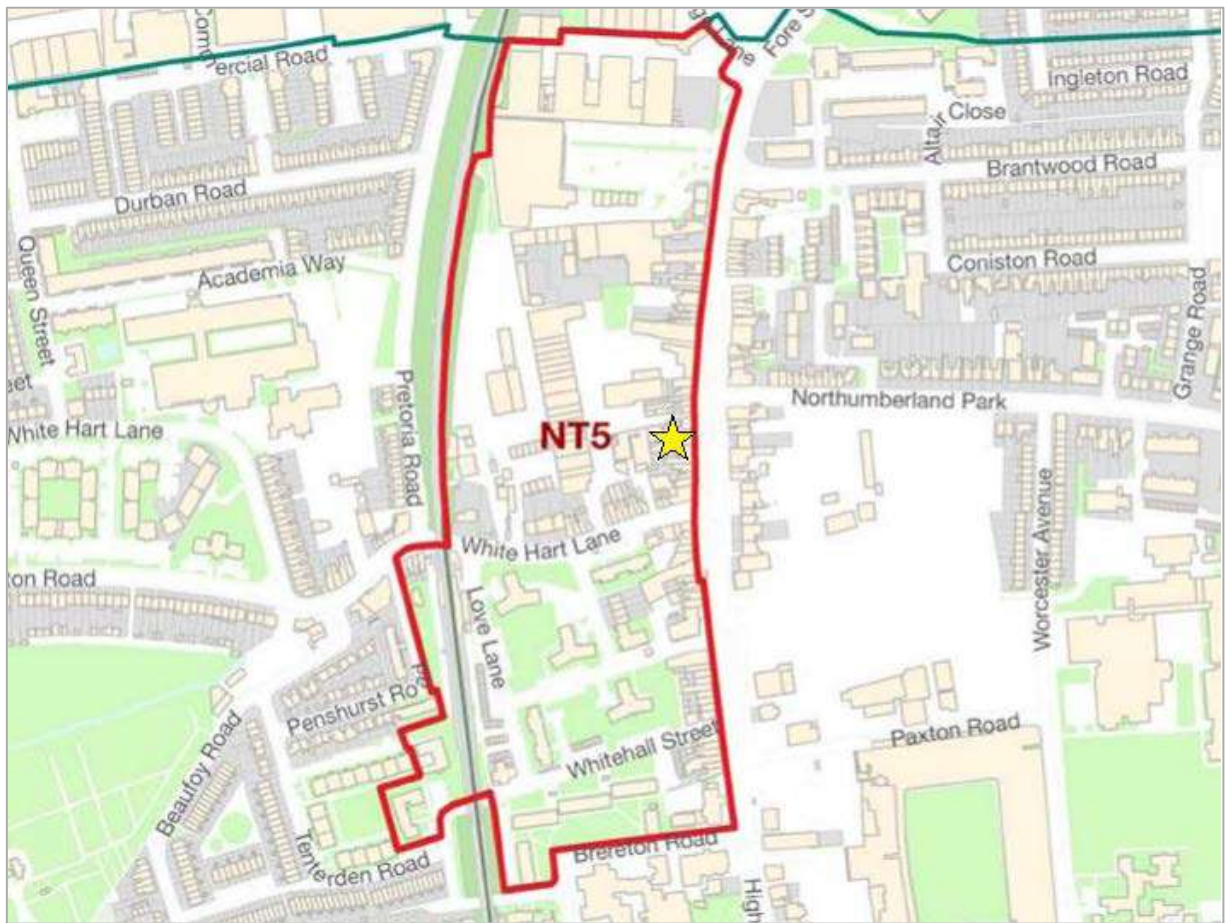
The Development Plan

- 5.3 In relation to the Proposed Development, the relevant Development Plan consists of the following documents:
- The London Plan (adopted 2021).
 - Haringey Strategic Policies Development Plan Document (adopted 2017).
 - Haringey Development Management Development Plan Document (adopted 2017).
 - Haringey Site Allocations Development Plan Document (adopted 2017)
 - The Tottenham Area Action Plan Development Plan Document (adopted 2017).

Tottenham Area Action Plan

- 5.4 The eastern boundary of the Site is located within Site Allocation 'NT5 – High Road West' of the Tottenham Area Action Plan (AAP) (see **Figure 5.1** below).
- 5.5 The AAP provides an indicative development capacity for the allocation, comprising 1,200 residential units, 4,353sqm of commercial use, 11,740sqm of town centre uses and 1,200sqm of other development.
- 5.6 The APP outlines several development guidelines for Site Allocation NT5. These include, amongst others:
- Provide a net increase in the amount/quality of public open space and private amenity space.
 - Be designed for future DEN connection.
 - Establish clear building frontages along the High Road.
 - Incorporate a range of residential typologies which could include courtyard blocks of varying heights.
 - In the part facing the new Stadium, respond to both the High Road character and the greater heights and density of the new Stadium.
 - Outline an assessment of the significance of any heritage assets, and how the development responds to this.

Figure 5.1: Location of Site within Site Allocation NT5



High Road West Masterplan Framework

- 5.7 The HRWMF (September 2014) underpins and masterplans the Site Allocation NT5 of the AAP and will be a material consideration in the determination process.
- 5.8 The document outlines a vision to create a *“fun, green and safe place to live and work, with a range of modern, high-quality homes that meet the needs of residents and offers more choice to get on the housing ladder”*.
- 5.9 The following six key themes are embodied within the HRWMF: (i) achieving good, high-quality design; (ii) provide better quality housing and choice; (iii) support existing traders, encourage new business and provide more opportunities for local employment; (iv) delivering more, better-quality open space including a large community park; (v) enhancing community facilities and activities, creating a place that offers the opportunity for everybody to be a part of the community with first-class facilities to enjoy, learn and be healthy; and (vi) improving transport and movement and delivering a fully connected community.

- 5.10 The Site itself is not identified for any particular land use within the HRWMF, nor is it allocated for development either in isolation or as part of a wider phase of regeneration. Rather, the HRWMF notes that the High Road is to be enhanced through a programme of refurbishments to the existing Victoria buildings stock in a manner that is complementary to the rest of the masterplan area to its west.
- 5.11 The overarching vision for the High Road is to create an attractive shopping destination for location people and visitors, with a broad mix of shops, a wider range of foods and service that better service the local community and attract new visitors.
- 5.12 The Site is also within the peripheral areas of the Peacock Gardens and Mews character areas, which have a wider focus on making efficient use of back-land for medium density living and working. New housing within the HRWMF should provide a mix of housing types and deliver well-designed, balanced and sustainable residential neighbourhoods.

Upper Lee Valley Opportunity Area

- 5.13 The London Plan confirms that the London Borough of Haringey is within 'Outer London' and the Lee Valley Opportunity Area (the "OA"). Significant growth is projected in the OA, indicatively estimated at 21,000 new homes and 13,000 new jobs.
- 5.14 Paragraph 2.1.29 states:

"The Lee Valley occupies a strategic position in the London-Stansted-Cambridge-Peterborough growth corridor and provides a range of development opportunities for higher density development."

- 5.15 The LP states that all developments "must" make the best use of land by following a designed approach "that optimises the capacity of sites, including Site Allocations" (Policy D3).
- 5.16 The related Upper Lee Valley Opportunity Area Planning Framework (July 2013) is consistent with the above and recognises the regeneration potential of the OA.

Presumption in Favour of Sustainable Development

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

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

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

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

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

- 5.18 Footnote 8 confirms that for applications involving “housing”, a failure to demonstrate (in the case of this application) a five-year housing land supply (“5YHLS”) will make those policies most important for determining the application out-of-date. The NPPF (Para. 63) and London Plan (Para. 4.1.9 & 4.15.1) confirm that student accommodation is a type of housing, and this use therefore falls within the application of Footnote 8 and a Council’s 5YHLS.
- 5.19 The latest publicly available information suggests that the London Borough of Haringey have a housing supply equating to 3.87 years⁵, equating to a shortfall of c. 2,900 homes. As such, the most important policies for determining the enclosed application are out-of-date, and the “tilted balance” (i.e. the presumption in favour of granting planning permission) is engaged.
- 5.20 Specific to Paragraph 11 (d,i), Footnote 7 explains that “assets of particular importance” includes, amongst others, designated heritage assets (i.e. the North Tottenham Conservation Area in this case).
- 5.21 The NPPF is a material planning consideration and does not override the primacy of the Development Plan afforded by Section 38(6) of the Planning and Compulsory Purchase Act 2004. As such, whilst the most important policies in this instance are out-of-date, they still attract weight when considering the Development Plan, albeit the weight to be attached is reduced as part of the tilted balance and presumption in favour of granting consent.

Key Planning Policies

Student Housing Delivery

- 5.22 The NPPF outlines the Government’s objective to “significantly boost” the supply of housing (Para. 60). Paragraph 63 requires local authorities to meet the housing needs of different groups, including students.
- 5.23 London Plan Paragraph 4.15.1 is explicit that “*PBSA therefore contributes to meeting London’s overall housing need and is not in addition to this need*”. Paragraph 4.1.9 notes that accommodation for students (non-self-contained) should count towards meeting housing needs on the basis of a 2.5/1 ratio.
- 5.24 Where student housing is proposed, the London Plan (Policy H15) requires the maximum level of accommodation to be secured as affordable student accommodation, with at least 35% provision required to follow the Fast Track Route (on non-industrial or non-public land such as the Site).
- 5.25 Haringey Strategic Policy DM15 requires student accommodation proposals to demonstrate that: (i) there would be no loss of existing housing; (ii) there would be no adverse impact on local amenity; (iii) the accommodation is of a high quality; (iv) provision is made for disabled students; (v) the need for additional bedspaces can be demonstrated; and (vi) the accommodation can be secured for occupation of a specified educational institution.

⁵ As confirmed by the Inspector’s Report (Para. 11) to Planning Appeal APP/Y5420/W/21/3289690; and restated in June 2023: <https://www.planningresource.co.uk/article/1828345/housing-land-supply-watch-five-english-regions-housing-land-supply-improved-%E2%80%93-one-not>

- 5.26 Whilst the Council's Housing Strategy (2017) suggests that there was no need for student housing in Haringey at that time, the more recent London Plan (2021) identifies a clear need for student accommodation across London. This states that London's overall housing need includes 3,500 PBSA bed spaces per annum. This is not broken down into borough-level targets as locational needs will vary over the Plan Period.
- 5.27 Furthermore, the Council's recent Officer Report to a nearby PBSA scheme at The Hale (ref. HGY/2021/2304) noted that there is a significant need for new homes (including student accommodation) across London as identified by the Mayor's Strategic Housing Market Assessment, and that the principle of new PBSA meeting housing needs was established (Paras 6.3.13 – 6.3.21). This was echoed in the Printworks Officer Report (ref. HGY/2023/2306) which noted that London represents the largest student housing market in the UK and Europe, but "does not come close" to providing the amount of accommodation required to house London's students (Para. 6.4.21).
- 5.28 London Plan Paragraph 4.15.4 requires a nomination agreement to be secured to link a development to a higher education provider. The London Plan is clear that a commitment to having such an agreement is a factor which demonstrates a need for student accommodation, irrespective of whether an operator is based on the same borough as a proposal.

5.29 Making Effective Use of Land

- 5.30 The NPPF requires planning decisions to make an effective use of land, in a way that makes "*as much use as possible*" of previously developed, brownfield land (Para. 123). The London Plan (Policy GG2) reflects this approach which is considered necessary to create successful and sustainable mixed-use places.

5.31 North Tottenham Growth Area

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

5.33 Economic Development

- 5.34 The London Plan (Policy GG5) supports economic development and regeneration. Similarly, the NPPF attaches "significant weight" to the need to support economic growth and productivity (Para. 85).

5.35 Heritage

- 5.36 Applicants are required by the NPPF to describe the significance of any designated heritage asset(s), and to consider the level of '*harm*' arising from a development (Paras. 200/205). In this case, the relevant designated heritage assets are the North Tottenham Conservation Area and several surrounding listed buildings on the High Road.
- 5.37 Where "*less than substantial*" harm arises to the significance of a designated heritage asset, this should be weight against the public benefits arising (Para. 208).

- 5.38 For non-designated heritage assets (i.e. the locally listed buildings adjoining to the immediate north and south), the NPPF notes that the effect of an application on the significance of the asset(s) should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement is required having regard to the scale of any harm or loss, and the significance of the heritage asset (Para. 209).
- 5.39 The NPPF is clear that when determining applications, local planning authorities should take account of the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses; the positive contribution that their conservation can make to sustainable communities, economic vitality; and the desirability of new development making a positive contribution to local character and distinctiveness (Para. 203). Paragraph 213 also recognises that not all elements of a Conservation Area will necessarily contribute to its significance.
- 5.40 Policy AAP5 seeks to achieve “well managed change” which balances continuity and the preservation of local distinctiveness and character, with the need for historic environments to be active living spaces that can respond to the needs of local communities.
- 5.41 The London Plan (Policy HC1) is consistent with the above, requiring proposals to conserve the significance of heritage assets by being sympathetic to their form, scale, materials and architectural detail. SP Policy SP12 seeks to ensure the conservation of the historic significance of Haringey’s heritage assets, specifying that the historic environment should be used as the basis for heritage-led regeneration and as the basis for good design and positive change.

Design

- 5.42 Achieving good design is a key aspect of sustainable development (NPPF, Para. 131).
- 5.43 Policy DM1 and London Plan Policy D5 require all development to achieve a high standard of accessible and inclusive design. The London Plan (Policy D6) also requires development make a positive contribution through its architecture, contribute to the distinctive character and amenity of the local area, and to not cause any unacceptable harm to the amenity of surrounding land and buildings.
- 5.44 LBH Policy DM2 seeks to ensure that new developments are accessible and safe, having regard to Secured by Design principles.
- 5.45 Despite being a type of housing for the purposes of meeting housing need, PBSA is treated differently in terms of design standards. The Mayor of London has also confirmed that the various guidance supporting the London Plan on residential standards do not apply to student housing⁶.

⁶ Housing SPD (March 2016, updated August 2017) Para. 2.1.13; Housing Design Standards – London Plan Guidance (June 2023), P1.

- 5.46 The GLA have also published a Practice Note⁷ which confirms that PBSA should be treated as hotel accommodation in line with Building Regulations. This means that hotel space requirements and internal facilities apply, and that either 10% or 15% of units should be wheelchair accessible depending upon which part of the Building Regulations they are being design to (London Plan Policy E10, H). This is echoed in emerging (draft) London Plan guidance on PBSA development.

Retail and Town Centre Development

- 5.47 The NPPF and Local Plan Policy DM41 supports new retail use within town centres such as the Site. Local Plan Policy NT5 confirms that main town centre uses within the NT5 allocation are also appropriate in principle. The vision for NT5 is to create a new residential neighbourhood and a new leisure destination for London (TAAP, Para. 5.125), i.e. this vision cannot be achieved without the provision of such uses.

Sustainability

- 5.48 All new development is expected to be zero carbon, in accordance with Local Plan Policy SP4 and London Plan Policy SI2. LBH Policy DM21 (d) confirms that carbon offset payments can be used where proposals are unable to meet carbon dioxide emission reduction targets on-site.
- 5.49 LBH Policy SP4 also requires that all new non-residential development achieve BREAAAM 'Very Good' standard as a minimum.
- 5.50 London Plan Policy SI2 requires major development to achieve a minimum on-site energy reduction of 35% beyond Building Regulations (Part L). Non-residential development should achieve 15%.
- 5.51 Following the introduction of more stringent Part L Building Regulations in 2021, the GLA produced further guidance in November 2022 which recognises that non-residential developments may find it more challenging to achieve significant on-site reduction beyond Part L. In such instances, rather than complying with London Plan Policy SI2 in this respect, the GLA requires a demonstration of the alignment to the energy hierarchy to minimise emissions as far as possible before offsetting.
- 5.52 It is therefore entirely appropriate for a non-residential development to fall below the 35% improvement suggested by Policy SI2, providing that it follows this approach. The GLA guidance is a material consideration which must be considered as part of the overall planning balance.
- 5.53 Local Plan Policy DM22 requires all development to prioritise connection to planned future decentralised energy networks. All major development within 500 metres of a planned network, which is considered by the Council likely to be operational within three years of a grant of planning permission, will be expected to secure connection to that network subject to demonstration of technical feasibility and financial viability.

⁷ Wheelchair Accessible and Adaptable Student Accommodation, Practice Note November 2022

Transport

- 5.54 The NPPF is clear that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe (Para. 115).
- 5.55 LBH's adopted Local Plan promotes public transport, walking and cycling as measures to tackle climate change and improve local environmental quality (Policies SP7, DM31 and DM32).
- 5.56 The London Plan outlines maximum car parking standards and promotes car-free development as the starting point for all development (Policy T6). Policy T6.4 concerns hotel⁸ parking and at sites with a PTAL of 4-6 states that parking should be limited to operational needs, disabled parking, parking required for taxis and deliveries/servicing.
- 5.57 Policy 6.5 requires non-residential development to provide at least one accessible parking space. For "hotel" development, supporting Table 10.6 requires that 6% of the total parking provision to be designated accessible spaces, and 4% of the total provision to be enlarged bays.
- 5.58 London Plan Policy T5 and Table 10.2 outline the minimum cycle parking standards by relevant use class which are summarised in the Transport Assessment. The London Cycling Design Standards requires that 5% of all cycle provision be provided for larger bicycles.

5.59 Other Key Policies

- 5.60 The following matters are also relevant to the proposals:
- New development should be at least "*air quality neutral*" (LP Policy SI1 and Policy GG3).
 - Sustainable Urban Drainage Systems (SUDS) should be utilised where practical, and proposals should aim to achieve greenfield run-off rates (LP Policy SI13).
 - Proposals should mitigate, and reduce to a minimum, potential adverse impacts resulting from noise (NPPF Para. 185; LP Policy D14).
- 5.61 Development should achieve a high standard of privacy and amenity to the users of a development and surrounding uses (Policy DM1). The scale of development should not cause material harm to the amenity of surrounding residents and occupiers of existing properties with regards to loss of daylight and sunlight, an increased sense of outlook, overlooking or a loss of privacy and excessive noise levels (LP Policy D6).

Relevant Supplementary Planning Guidance/Documents

- 5.62 The GLA have produced the following relevant SPGs/SPDs and guidance:
- Sustainable Design and Construction SPG (April 2014).

⁸ As noted above, GLA Guidance (Wheelchair Accessible and Adaptable Student Accommodation, Practice Note November 2022) states that PBSA should be treated as hotel accommodation, not residential.

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

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

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

Summary

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

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

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

5.67 By virtue of Haringey's failure to demonstrate a 5YHLS, those policies that are most important for determining the application are out-of-date. Whilst these policies must still be considered as part of the Development Plan, the presumption in favour of granting consent (the tilted balance) is engaged and the weight that these policies attract must be reduced accordingly.

5.68 Planning permission must therefore be granted unless any policies in the NPPF relating to designated heritage assets (i.e. the Conservation Area and any surrounding listed buildings) provide a clear reason for refusal, or any adverse impacts of granting consent would significantly and demonstrably outweigh the benefits, when assessed against the NPPF as a whole.

6 Planning Assessment

6.1 Following a review of the relevant planning policies, the following key policy themes have been identified for the Proposed Development:

- The principle of the development.
- Matters of comprehensiveness.
- The historic environment.
- The design and external appearance.
- Sustainability.
- Transport.
- The Environment.
- Other considerations.

Principle of Development

6.2 The Site has been vacant for some time and comprises previously developed (brownfield) land as defined within the NPPF. The National Planning Policy Framework at Paragraph 124 supports the utilisation of previously developed land. The use utilisation of brownfield land is also supported by Policy D3 of the London Plan.

6.3 The London Plan also supports residential growth in the Lee Valley OA, including student homes.

6.4 The Site also lies within Site Allocation NT5, being at the interface between the High Road and the west of the allocation. NT5 is allocated for major regeneration to create a new residential neighbourhood and leisure destination for London. The Proposed Development would align with these policy requirements.

6.5 The Site benefits from an extant consent for its redevelopment for residential development of a similar scale and massing to that now proposed. There have been no material changes in circumstance or policy since that would change this position.

6.6 The proposed development is therefore acceptable in principle.

Comprehensiveness

6.7 The Proposed Development must not be prejudicial to the Site Allocation NT5 and the HRWMF. In this context, it must be recognised that the Site is located at the periphery of the HRWMF boundary and is relatively minor in size. The HRWMF in-particular identifies the High Road frontage for a programme of enhancement works, rather than being integral to the wider redevelopment of any particular land parcels. The scheme would not prejudice the wider delivery of Site Allocation NT5, therefore.

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

- The proposals will help with the wider achievement and delivery of comprehensive development within NT5. The LBH have previously approved planning applications for individual sites within Site Allocation NT5 including at the Site. This approach has also been accepted twice by the Planning Inspectorate at appeals relating to the Goods Yard and The Depot sites.
- The proposed layout therefore functions effectively in an interim state, or as an integral part of the future redevelopment of NT5. The scheme design allows for the rear of the Site to be integrated with surrounding development in the future through increased permeability and pedestrian connectivity. Based on the contemplated masterplan of the HRWMF, adequate daylight and sunlight would remain
- The Applicant have undertaken a comprehensive pre-application engagement process with neighbouring landowners, including local residents and businesses. The enclosed proposals are an evolution of the previously consented proposals at the Site, retaining the agreed design approach and proposing an alternative residential typology.
- The proposals would make a significant and positive contribution to wider objectives for the area, optimising the Site's development potential in a sustainable manner that is consistent with the broad principles of the HRWMF.
- The application optimises the development outcomes for the Site, including an increased number of homes (including affordable accommodation).

6.9 It is clear, therefore, that the Site's redevelopment is aligned with the strategic aims for the High Road in this regard, and would not prejudice the wider delivery potential of Allocation NT5 or the HRWMF in any way given its peripheral location within the masterplan boundary. Rather, the Site would be entirely complementary to the future development of the wider High Road West area, and the scheme will consolidate Percival Court and its future potential as a pedestrian-through route to the rear land as this comes forward.

Purpose-Built Student Accommodation

- 6.10 LBH are unable to demonstrate a five-year housing land supply with a shortfall of c.2,900 units having been identified. The relevant supporting text contained within the London Plan outlines that student housing comprises an element of the overall housing need for London (Paragraph 4.15.1).
- 6.11 The NPPF at Paragraphs 60 and 61 outlines that the planning system should significantly boost the supply of housing and that housing figures should be treated as minimum requirements. The Proposed Development would, therefore, make a valuable contribution to the delivery of new homes in Haringey.
- 6.12 Policies H15 of the London Plan and DM15 of the Local Plan support the delivery of PBSA subject to certain criteria. An assessment of the Proposed Development against each of the criteria is set out further below.

There would be no loss of existing housing

- 6.13 The Site as existing has two self-contained flats within it, although these have been vacant for some period of time and are considered to be uninhabitable. Based on the above, at the ratio of 2.5:1 (i.e. 2.5 student beds equate to one dwelling), as set out within Policy H7 of the London Plan, the Proposed Development would result in a net addition of eight homes at the Site.

There would be no adverse impact on local amenity

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

The accommodation is of high quality

- 6.15 A high-quality scheme is proposed which responds effectively to its local context and will provide much needed student accommodation in London. The scheme will provide well sized rooms together with associated facilities either within studio apartments, or shared kitchen facilities.
- 6.16 In addition to this, the Proposed Development will also provide an additional 58.1sqm of shared amenity space, and an open space provision of 169.3sqm within the site for the enjoyment of residents. In total, 227.4sqm of additional amenity space is proposed.
- 6.17 Further information on this can be found in the Design and Access Statement submitted in support of the application.

Provision is made for disabled students

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

A need can be demonstrated

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

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

- 6.21 As per the above, a Nominations Agreement will be secured via a S106 Agreement to ensure policy compliance. Affordable housing will be provided in full accordance with more recent London Plan requirements.

Density

- 6.22 The London Plan does not prescribe density targets for sites relative to their PTAL rating. Rather, it seeks to optimise the capacities of sites by making the best use of land, supporting higher densities at sites that are well located to jobs, services, infrastructure and amenities by public transport, walking and cycling (Policy D3).
- 6.23 Reflective of this approach, Local Plan Policy GG2 requires that planning “*must proactively explore the potential to intensify the use of land to support additional homes...promoting higher density development*”. London Plan Policy H1 also adds that Boroughs “*should optimise the potential for housing delivery*” on all suitable and available brownfield sites.
- 6.24 The Proposed Development has followed a design-led approach in consultation with LBH and other stakeholders (as set out in Section 3 of this Planning Statement). In addition to the retail space, the Proposed Development will deliver student housing at a rate of c.43 bed spaces per hectare. The design of the Proposed Development is also informed by several key constraints, most notably the location within the Tottenham Conservation Area, as well as the requirement to deliver associated works such as amenity, and cycling storage spaces.
- 6.25 Having regard to the above, the Proposed Development is appropriate to the adjacent built environment and its location within the Tottenham Conservation Area without resulting in an overbearing presence, or harming the character and appearance of the streetscene. Importantly, the design principles approved by Haringey are retained.
- 6.26 Based on the above, the Proposed Development presents the optimal density for the Site and therefore, is consistent with the requirements of policies D3 and GG2.

Affordable Student Accommodation

- 6.27 DMD Policy DM13 seeks the “maximum reasonable” amount of affordable housing on schemes greater than 10 units. The policy confirms that this applies to student accommodation.
- 6.28 The more recent London Plan (Policy H15) requires at least 35% of student beds to be affordable to follow the Fast Track Route on non-industrial or non-public land such as the Site.
- 6.29 The proposals will provide 35% (9 beds) on-site as affordable student accommodation. As such, the Proposed Development complies with Policy H15 and can be progressed via the Fast Track Route. The provision of affordable housing would be secured by planning obligation.

Class E Unit

- 6.30 The flexible commercial unit as proposed will provide an additional 196.7sqm (GEA) of space. This is proportionate to the requirements of the HRWMF which provide an indicative capacity of 4,350sqm of commercial floorspace. Furthermore, the space will support opportunities for local business growth as per Paragraph 85 of the NPPF.
- 6.31 The Proposed Development would provide a flexible unit which would provide variety and interest, support the local population. They will provide natural surveillance and activity throughout the scheme, including to the public routes and spaces, and will benefit the Site both in its interim development stage as well as alongside the future masterplan delivery.
- 6.32 From the above, it is evident that the Proposed Development would complement the aims and objectives of the HRWMF and Allocation NT5, rather than being prejudicial to it and as such, the principle of a commercial unit in this location is acceptable. This has also been ascertained during pre-application discussions with the LBH and through the previous approved planning application at the Site which included a proposal for the same use.

Historic Environment

- 6.33 The Planning (Listed Buildings and Conservation Areas) Act 1990 provides the statutory basis for the protection of the built historic environment. Sections 16 and 66 of this Act require that *“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”*.
- 6.34 Section 72 of the same Act states also requires decision makers to pay special attention preserving or enhancing the character and appearance of land or buildings within a Conservation Area.

North Tottenham Conservation Area

- 6.35 807 High Road dates to the late 19th century and replaced earlier development at the Site. It has been subject to modern alteration, including ‘modernisation’, of the shopfront and fenestration. It is considered by Quod that as existing, the Site detracts from the Conservation Area and the immediate surrounding buildings, which include shopfronts and detailing that is more consistent with the overarching significance of the Conservation Area.
- 6.36 Within the North Tottenham Conservation Area Appraisal the Site is identified as providing a neutral contribution to the Conservation Area. Therefore, there is an opportunity to introduce development at the Site which would enhance the character and appearance of the Conservation Area.
- 6.37 The detailed design of the Proposed Development achieves this through the retention of key features which contribute positively to the Conservation Area, such as the use of brickwork and lintel detailing, as well as a shopfront which is more consistent with those on the street scene.
- 6.38 In addition to this, the following public benefits will derive from the Proposed Development.

- The development involves the redevelopment of previously developed land and will contribute to meeting housing needs in a highly sustainable location.
- The development will secure the long-term optimum viable use of the Site.
- The mixed-use development, notably the increase in residential units, will contribute to the wider area's vitality and viability, through increased footfall and spending. There will be an increase in Council Tax payments resulting from the additional residential units created.
- The proposals contribute to the implementation of the HRWMF, creating a sustainable and healthy community, benefitting the wellbeing of future occupants and enhancing the character and amenity of the area.
- Development will give rise to a range of temporary and permanent employment opportunities during the construction and operational phases. New jobs will bring greater wealth and wellbeing.
- The development will be car free and is able to make use of several nearby public transport links. In turn, the creation of car free development will have local air quality benefits.
- Natural surveillance over High Road and Percival Court will be provided, deterring criminal / antisocial behaviour and creating a safer and more secure community.
- The proposals involve a significant environmental improvement over the existing condition, with better quality of design and the provision of private and communal amenity space that exceed minimum requirements (see below). The proposed landscaping will improve the Site's biodiversity.
- The buildings will greatly improve the Site's sustainability credentials and energy efficiency, it is being designed to connect to the DEN, is being designed to BREEAM 'Very Good' standard and will achieve 'Zero Carbon'.

6.39 Therefore, having regard to the above and the policy tests as set out above, the Proposed Development would not result in a harmful impact upon the North Tottenham Conservation Area

6.40 Furthermore, it is also noted that the loss of the existing buildings at the Site and their replacement with a highly comparable scheme to that as proposed has been previously considered by officers as part of application HGY/2021/0441 and was fully supported as per the following response (para. 5.2).

"The proposed scheme would replace an undesignated building dating from the late 1940s and would improve this part of the North Tottenham Conservation Area through good design and a better use of its spaces. The proposed scheme is respectful of its neighbours and wider context and would provide a well-proportioned contemporary reinterpretation of a classical townhouse characterised by symmetry, well-detailed windows and an elegant shopfront to ground floor. The proposed development to the rear is more markedly contemporary and includes a well-integrated landscape design. Detailed design to include façade treatment, windows detailing and materials, especially in relation to the building fronting the High Road are fundamental to ensure a seamless insertion of the new buildings within the existing townscape. The proposed development is fully supported."

Listed Buildings

- 6.41 The nearest statutory listed buildings are 819/821 High Road (Grade II) further north, and 797/799 High Road (Grade II) further south. The Site is not directly connected to these buildings, and there would be no adverse impact arising on their setting; rather, there would be a visual enhancement achieved to the setting of the wider street scene.
- 6.42 The Site adjoins locally listed buildings on either side within the terrace at No. 809/811 (north) and No. 803/805 (south) High Road. Paragraph 209 of the NPPF requires that the effect of an application on the significance of a non-designated heritage asset should be taken into consideration when determining the application. As existing, the Site is of neutral contribution to the setting of the adjacent assets. The Proposed Development retains the principles of the Site's High Road façade as existing, although the modernisation and detailing of features will enhance the visual appeal of the building. As such, the Proposed Development will not result in a harmful effect on non-designated heritage assets.

Summary

- 6.43 By virtue of its scale, form and detailed design, the Proposed Development would result in an enhancement to the character and appearance of the North Tottenham Conservation Area and would not result in a harmful impact upon the setting of any nearby listed buildings. Furthermore, the Proposed Development would result in significant public benefits in terms housing delivery and energy efficiency, as well as the delivery of the strategic aims of LBH through allocation NT5 the HRWMF
- 6.44 Therefore, the Proposed Development meets the statutory and policy requirements as set out above.

Design and Appearance

- 6.45 Policy DM1 requires all new development to achieve a high standard of design and contribute to the distinctive character and amenity of the local area. The proposals have been subject to a design-led process and satisfy this requirement.
- 6.46 A full description and analysis of design of the Proposed Development is provided in the accompanying DAS, including how the proposals satisfy the Haringey Development Charter. In summary, the proposals have been informed by a robust analysis of the surrounding context, as well as the requirements contained within the relevant planning policies, including site allocations.
- 6.47 Overall, the design team has sought to ensure that the Proposed Development is successful today within the existing context and can also be integrated easily into future neighbouring developments and contribute significantly for the wider benefit of the community.
- 6.48 Importantly, the proposals retain the design principles which were accepted as part of the extant scheme (HGY/2021/0441) with the Design Officer concluding that the design was appropriate for its location as per the below (para. 5.2).

“The proposals are well designed and promise to be a polite insertion into the Conservation Area and High Road frontage, including an active frontage through a well-designed shopfront to the High Road and appropriate more private frontage to the Percival Court mews street.”

6.49 In addition to this, the design of the building was welcomed during pre-application discussions concerning the Proposed Development, with minor comments raised (and responded to) relating to the ground floor layout and Percival Court frontage.

Sustainability

6.50 The application has full regard to the energy hierarchy set out in the London Plan, and satisfies all relevant sustainability policies as follows:

- Through on-site measures and offsetting payments, the new development would ensure that it is zero carbon. This satisfies Local Plan Policies SP4 and DM21.
- The proposals would achieve an on-site reduction beyond Building Regulations equating to 86.5% (DEN connection scenario) and 15.6% (air source heat pump scenario). The DEN connection exceeds the London Plan requirement of a minimum 35% reduction. In the case of the alternative (ASHP) scenario, the GLA have confirmed via written guidance (November 2022) that non-residential development may find it more challenging to achieve the required Part L reductions, and this is appropriate providing that the energy hierarchy to minimise emissions as far as possible is applied. As explained in the submitted Energy and Sustainability Statement, the proposals adopt this approach and London Plan Policy SI2 is satisfied.
- London Plan Policy SI2 also requires non-residential development to achieve 15% through energy efficient measures, with any shortfall provided through a cash in lieu contribution. The proposals achieve 85.4% (DEN) and 11.5% (ASHP) respectively.
- The commercial unit would achieve, as minimum, BREEAM ‘Very Good’ standard, as required by Local Plan Policy SP4.

6.51 In addition to the above, the development is designed to facilitate a future District Energy Network (DEN) connection to achieve further improvements in energy performance.

Transport

6.52 The Transport Statement submitted in support of the application confirms that the development is acceptable in highways terms, and there would be no adverse impacts arising in terms of highways safety.

6.53 The student component of the development is car free, which is supported by planning policy at the London and local levels including Policy T6.1 of the London Plan. A single accessible commercial parking space would be provided which is necessary to attract and incentivise high-quality occupiers for the units.

6.54 **Table 6.1** below sets out the cycling provisions requirement as contained within Policy T5 of the London Plan, against those provided within the Proposed Development.

Table 6.1: Parking Cycle Requirements Based.

Use	Total required	Total proposed	Policy Compliant
PBSA – Long Term	19	19	Yes
PBSA – Short Term	1	1	Yes
Flexible Class E use – Short Term*	6	6	Yes
Flexible Class E use – Long Term*	2	2	Yes

*(based on most onerous policy requirement)

- 6.55 This table confirms that cycling parking is compliant with policy. This would be achieved through a mix of covered spaces and on street short stay spaces.
- 6.56 Furthermore, as aforementioned, there are two Sheffield stands immediately adjacent to the Site on High Road, which would provide a further provision of cycle parking for users of the retail unit.

Environment

- 6.57 London Plan Policy D14 (Noise) also requires that development proposals should reduce, manage and mitigate noise to improve health and quality of life. The design of the Site is such that the primary accommodation block is to the rear of the site, away from the primary noise source of traffic on High Road. The six units which front High Road include appropriate mitigation in the design of the façade to ensure that they are not adversely affected by noise pollution.
- 6.58 Additionally, Policy D13 (Agent of Change) of the London Plan also places the responsibility for mitigating impacts from existing noise and other nuisance-generating activities or uses on the proposed new noise-sensitive development. The main noise generating site in proximity to the Site is the public house to the south. The accompanying Noise Assessment confirms that the development is acceptable in noise terms subject to the inclusion of appropriate designed mitigation. This includes the use of high-performance acoustic glazing and mechanical ventilation between the Proposed Development and the adjacent premises, as well as the location of external plant as required.
- 6.59 A Flood Risk Assessment has been prepared in support of the application which demonstrates that the Proposed Development has a low probability of flooding from tidal, pluvial, groundwater and artificial sources and confirms that fluvial flood risk is managed appropriately in line with local and national policy. It also confirms that surface water runoff from the site can be managed sustainably (utilising SUDs) to ensure that flood risk is not increased elsewhere.

- 6.60 In accordance with the relevant London Plan waste policies and the NPPG, waste arising from the Site during the construction and operational phases will be appropriately managed. A Site Waste Management Plan is included within the Transport Statement that sets out the measures to be implemented to ensure that the development is appropriately managed in terms of waste.
- 6.61 In relation to Ecology, the Site currently generates zero biodiversity units due to the lack of vegetated habitats at the Site. Therefore, it is exempt from the Statutory 10% biodiversity net gain requirement recently introduced by the Environment Act 2021. However, through embedded design measures, the Proposed Development will still deliver net gain for Biodiversity Net Gain, which can be secured by planning condition and/or planning obligation where required. As such, the Proposed Development complies with paragraph 80 of the NPPF which requires that proposals, amongst other things, minimise impacts on and provide net gains for biodiversity.

Other Considerations

- 6.62 A Phase 1 Site Investigation has been undertaken and the associated Report (prepared by Waterman) accompanies this submission. This confirms that the overall risk for the Site is deemed to be “low”, and that further intrusive investigation to quantify the contamination status of the Site is not required, given the Site’s history and the proposed development.
- 6.63 An Archaeological Desk Based Assessment has been undertaken which confirms that the Site is likely to have a moderate potential for remains, and has suggested that archaeological potential be addressed in the form of a watching brief or targeted trial trenching via an appropriately worded pre-commencement condition.
- 6.64 Policy D6 of the London Plan requires that the design of development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context. A Daylight Sunlight Assessment has been submitted in support of this application. The assessment finds that the Proposed Development will provide good and acceptable levels of daylight and sunlight amenity for its users, having regard to the urban context of the Site and the densities as set out within Site Allocation NT5.

7 Planning Obligations and Community Infrastructure Levy

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

National Legislation and Policy

Community Infrastructure Levy Regulations 2010 (as amended)

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

NPPF

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

London Plan

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

Local Policy and Guidance

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

Draft Heads of Terms

- 7.8 Table 8.1 below provides an initial schedule of potential financial and non-financial obligations arising from the proposed development, having regard to the LBH Planning Obligations SPD and relevant policy and guidance at the national, London and local levels.

Table 8.1: Proposed Indicative Planning Obligations

Topic	Proposed Contribution	
	Non-Financial	Financial
Affordable Student Accommodation	On-site affordable housing.	n/a
Marketing and Letting Material	To potential tenants of units in no. 807 to highlight the existence and location of the pub beer garden.	n/a
Local Employment & Training	Construction Phase – to enter into a Local Training and Employment Plan.	n/a
Car Free	No Residents Parking Permits for future residents	n/a
Energy	Submit a further revised Energy and Sustainability Statement	n/a
Be Seen	Commitment to uploading data to the GLA's Energy Monitoring platform.	n/a
Environmental Sustainability	Measures to be provided to meet standards on-site.	Carbon offset payments.
Monitoring	n/a.	Financial sum TBC.
District Energy Network (DEN) Connection	Connection to DEN safeguarded.	Carbon offset contribution (payable after 10 years if no connection to DEN).
Considerate Contractors Scheme	Commitment to the Considerate Contractors Scheme as part of the Construction Management Plan.	n/a

- 7.9 The above is intended to form the basis of subsequent discussions and negotiations with the LBH. It is important, however, that the application is considered on its own merits and against policies which require consideration of the deliverability of the proposals as a whole.

8 Conclusions

- 8.1 This Planning Statement supports an application for full planning permission for the demolition of existing buildings at the Site and the construction of new buildings to accommodate a student led, mixed-use development.
- 8.2 The scheme has significant planning merit and would contribute to the Council's regeneration aspirations for this part of Tottenham. The Proposed Development does not conflict with the strategic principles of Site Allocation NT5 and the HRWMF, being entirely compatible with the future wider regeneration aims, and not prejudicing these in any way.
- 8.3 The principle of the development is supported by relevant local and national planning policies and has been agreed with Officers as part of the preapplication process. The enclosed application documents demonstrate that the scheme is appropriate in terms of design, and will not result in a harmful impact in terms of any other technical and/or environmental considerations.
- 8.4 Therefore, the application accords with an up-to-date Development Plan, and there are no other material considerations that would preclude the development from being brought forward. The scheme assists with the delivery of sustainable development and therefore, is supported by the overarching aim of the planning system.



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