

**FORMER CAR WASH,
LAND ON THE EAST SIDE OF BROAD LANE,
LONDON N15 4DE**

PLANNING STATEMENT



NTA PLANNING LLP
TOWN PLANNING CONSULTANTS

CONTACTS

MANDIP SINGH SAHOTA
MANAGING PARTNER

MS@NTAPLANNING.CO.UK



NTA PLANNING LLP
TOWN PLANNING CONSULTANTS

LONDON (HEAD OFFICE)

46 JAMES STREET
LONDON
W1U 1EZ

T: +44 (0)20 7636 3961

HARROGATE

CLARENDON HOUSE
VICTORIA AVENUE
HARROGATE
HG1 1JD

T. 075 9689 6216

WWW.NTAPLANNING.CO.UK
INFO@NTAPLANNING.CO.UK

December 2025

Revision 1

Our Ref: 814

NTA PLANNING LLP is a limited liability partnership registered in England and Wales.
Registered number OC438813.
Registered office: 46 James Street, London W1U 1EZ

CONTENTS

	Page No.
1. INTRODUCTION	4
2. DESCRIPTION OF THE SITE AND SURROUNDING AREA	6
3. PLANNING HISTORY	9
4. CONSULTATION AND REVISIONS	10
5. THE PROPOSED DEVELOPMENT	18
6. RELEVANT PLANNING FRAMEWORK	21
7. PLANNING ASSESSMENT	22
a. Principle of Development	22
b. Design	27
c. Landscaping, Biodiversity and UGF	29
d. Neighbouring Amenity	30
e. Highways and Transport	31
f. Energy, Sustainability and Overheating	34
g. Drainage and Flood Risk	35
h. Air Quality	36
i. Fire	37
j. Planning Benefits	37
8. SUMMARY AND CONCLUSIONS	39

1.0 INTRODUCTION

- 1.1 This Planning Statement has been prepared on behalf of Broad Lane Properties Limited (the **Applicant**) and accompanies a full planning application for works at the Former Car Wash, Land East Side of Broad Lane, London N15 (the **Site**). The planning application was submitted in April 2023, and registered under application reference HGY/2023/0464. Since the application was first submitted, it has been subject to various design changes. Accordingly, this statement comprises an updated version of our original Planning Statement, providing the relevant updates.
- 1.2 The 0.13ha Site is rectangular in shape and is located on the eastern side of Broad Lane. The Site was last occupied by a single storey car wash facility but has been demolished in recent years and currently lies vacant.
- 1.3 The Site currently benefits from an extant planning permission for the *'Demolition of the existing car wash, construction of a new office block including, covered bin and cycle store and parking'* (Council Ref: HGY/2016/2232). The development permitted 1,944sqm of employment generating space. The planning permission was subsequently implemented by the previous owners and the works validated through a certificate of lawfulness (Council Ref: HGY/2020/1013). Whilst works had commenced, the building works have not progressed.
- 1.4 To the north of the Site is a retail park and the emerging commercial Tottenham Hale District Centre. The retail park within the District Centre is set to be comprehensively transformed to include new commercial, retail, leisure, and residential uses. Buildings will be mid-rise and include taller buildings towards Ferry Lane. To the west and south of the Site are industrial buildings with light industrial and office use.
- 1.5 The application Site is therefore located in a transitional pocket between an industrial area and the emerging District Centre. Whilst the Site's extant approval for an office building would contribute to the existing and emerging contexts, the applicants consider that the Site has the potential to make a much more meaningful contribution to the emerging context and employment opportunities. The Site is also noted to fall within a Locally Significant Industrial Site (LSIS) where employment uses should be optimised.
- 1.6 Accordingly, the Applicant seeks to improve upon the extant consent to make more efficient use of the Site as encouraged by the Local Plan, the London Plan and the NPPF whilst at the same time improving on the design of the extant planning permission.
- 1.7 The final design proposals comprise a new building of superior architectural quality, ranging from 4 to 9 storeys. The office building will comprise approx. 4,938sqm (GIA) of much needed, multi-functional office floorspace - Class E(g), an uplift of 2,994sqm over the extant consent.
- 1.8 The development will provide a greater employment opportunity in a vastly improved building arrangement, together with fabric and sustainability improvements including PV panels, green roofs, and efficient levels of building insulation. It will also support the regeneration of Tottenham Hale towards a highly successful place by attracting new business and job opportunities in a location with excellent public transport connections.

Structure of this Statement

- 1.9 This statement first provides a description of the Site and the surrounding area in section 2.
- 1.10 In section 3 we provide a summary of the Site's planning history

- 1.11 Prior to the submission of this application, the Applicant engaged extensively with the local community via a Public Consultation process. We provide a summary of those discussions in Section 4 of this statement which should also be read alongside the Statement of Community Involvement (SCI), submitted as part of the application, prepared by YourShout (Thorncliffe). Since the application was first submitted in April 2023, the application has been subject to further changes. These changes are summarised in Section 4. This section should be read alongside the DAS (+ Addendums) prepared by Mark Smith Architects, submitted herewith.
- 1.12 In section 5 we provide a description of the proposed development. This section should also be read alongside the Design and Access Statement prepared by the project's architects, Mark Smith Architects.
- 1.13 In section 6 we set out the relevant planning policy framework applicable to the proposals, followed by section 7 where we provide a detailed planning assessment of the development against relevant policy and other material planning considerations.
- 1.14 Finally, this statement is concluded in section 8.

2.0 DESCRIPTION OF THE SITE AND SURROUNDING AREA

- 2.1 The application Site comprises the Former Car Wash, Land East Side of Broad Lane, London N15, located within the London Borough of Haringey.
- 2.2 The Site is rectangular in shape and is located on the eastern side of Broad Lane. The Site area is 0.13ha.
- 2.3 The Site was once occupied by a c.1,060sqm (GIA) car wash facility. The car wash utilised an internal courtyard parking area accessed from a private road via Broad Lane which formed the area for servicing. The facility has been demolished in recent years following the grant of planning permission for redevelopment of the Site - see Planning History.



EXISTING SITE VIEWED FROM BROAD LANE

- 2.4 The Site is not in a Conservation Area, the nearest Conservation Areas are Tottenham Green and Seven Sisters/Page Green approx. 500 metres to the west of the Site.
- 2.5 There are currently no buildings on Site and there are not any locally or statutorily listed buildings near the Site.
- 2.6 Vehicular access and egress are currently obtained via side road off Broad Lane. On the opposite side of this road is a two-storey brick building with pitched roof (National College for Digital Skills). This building along with adjoining buildings to the north form a business centre with office/administrative use.
- 2.7 Immediately adjacent to the south of the Site (on Broad Lane) is Esin Court comprising a row of two-storey brick built terraced dwellings. Behind the terrace is a three-storey metal clad warehouse.
- 2.8 To the west of the Site is The High Cross Centre, an industrial site consisting of warehouse type buildings, typically metal clad but some brick with saw-tooth roofs. Uses range from retail, manufacturing, and office/studio.

- 2.9 To the immediate east of the Site is a small timber workshop.
- 2.10 On the west side of Broad Lane are three-storey brick built residential buildings.
- 2.11 The Site is approximately 500 metres south of Tottenham Hale. Tottenham Hale is undergoing intensification and diversification with the creation of a new retail area centred on the station as part of the Tottenham Hale Area Action Plan. The area is undergoing significant growth and seeks to be a leisure destination with new services/facilities, jobs and homes that will complement the current vibrancy of the area.
- 2.12 The existing retail park to the north is set to be comprehensively transformed into the heart of the District Centre. This will include new commercial, retail, leisure, and residential use. Buildings will be mid-rise and include taller buildings towards Ferry Lane.



SITE CONTEXT PLAN

- 2.13 With regard to transport, the Site is located within a Controlled Parking Zone (CPZ), with on-street parking controls on all surrounding roads. These controls mainly consist of double red lines as part of the red route restrictions. Along minor arms of Broad Lane, there are several restrictions including the double red line and residential permit holder spaces. Fountayne Road to the south of the site forms a minor arm off Broad Lane, with double red lines for part of the road and single yellow line thereafter.
- 2.14 The CPZ (Seven Sisters) operates restrictions Monday-Friday 08:00-18:30, whilst there are a number of resident permit holder parking bays on the roads surrounding the Site, including Tynemouth Road (entire length), Springfield Road and 3 bays on Fountayne Road.
- 2.15 The Site is well served by numerous bus routes and is close proximity to Tottenham Hale Underground Stations (located 530m north) and Seven Sisters Underground Station (located 930m from the Site). In addition, both stations are located on the Greater Anglia Rail Network.

- 2.16 Based on the details on WebCAT, the Site is subject to a PTAL rating of 6a, which denotes an “Excellent” level of access. The PTAL rating ranges between 1a to 6b, with 1a denoting ‘Very Poor’ access to public transport and 6b being an ‘Excellent’ level of access.
- 2.17 The Site is suitably located for sustainable methods of travel including walking, cycling and public transport.

3.0 PLANNING HISTORY

- 3.1 The Councils online planning records indicate historic applications for works at the Site. We provide a summary of the pertinent cases below.

HGY/1994/0521

- 3.2 Erection of single storey building for use as a car wash – *approved 23/08/1994*.

HGY/2014//1114

- 3.3 Demolition of existing carwash and erection of a 5-storey block comprising 235.5sqm ground floor B1 office unit, 21 residential units (7x1 bed, 8x2 bed, 4x3 bed and 2x4 bed), covered bin storage, cycle storage and 12 parking spaces – *withdrawn 08/07/2014*.

HGY/2016/2232

- 3.4 Demolition of the existing car wash, construction of a new office block including, covered bin, cycle's store and parking – *approved 24/03/2017*.



APPROVED CGI - HGY/2016/2232

HGY/2020/1013

- 3.5 Certificate of lawfulness (existing use) for implementation of planning permission HGY/2016/2232, by setting out, excavating, and pouring part of the concrete foundations designed for the office development in accordance with approved plans 3006 PL L01, 3006 PL 11J, 3006 PL 12M, P006 PL 13M, 3006 PL 18.1, 3006 PL 18.2, 3006 PL 18.3, 3006 – *approved 03/06/2020*.

4.0 CONSULTATION AND REVISIONS

4.1 The Council strongly encourage applicants, prior to applying, to discuss their proposal with likely affected parties, such as neighbours. Consultation should be as early as possible; and should submit a consultation statement that summarises the consultation organised, the key issues raised, and how the applicant has addressed those issues. The council recognise that there are many benefits associated with pre-application community involvement, providing the local community and other stakeholders with the opportunity to let. Pre-application involvement will, where appropriate, be encouraged for schemes other than major proposals, especially if they are likely to be contentious.

4.2 Prior to the submission of this application, community consultation has been undertaken by specialist community consultation group 'Your Shout', part of Thorncliffe, on behalf of the applicant, Broad Lane Properties Limited. Please see Statement of Community Involvement submitted herewith.

4.3 Yourshout publicised the consultation to the households and businesses surrounding the Site, using GPS-tracked hand delivery to distribute the information letter to 635 properties, as shown in the map, right. The letter was delivered on 19 January 2023.



4.4 There were a few properties that were unable to be delivered – these were 33-54 Lea Court. As a result, letters were posted to these properties using Royal Mail.

CONSULTATION LETTER DROP AREA

4.5 The objective of the letter was to publicise the project website (www.BroadLane.site), to communicate information about the scheme, and to encourage local residents to share their views about the proposal. The letter included a freephone number and freepost address, to increase accessibility in the consultation. The website went online on 19 January 2023 and will be maintained throughout the planning application process.

4.6 Yourshout have maintained, and in some cases continue to maintain, several response mechanisms for the local community and stakeholders to share their views about the scheme, including: a survey on the CommunityUK portal; questions to the team, via the Ask Questions page; a freephone number, staffed during office hour; a consultation event hotline; a bespoke email address: broadlane@yourshout.org; and a freepost address.

4.7 Two people submitted questions using the website's 'Ask Questions' page. As of 30 January, no residents emailed the dedicated email address. Five responses to the feedback form were received (as of 30 January 2023). A full set of results can be found online here <https://broadlane.communityuk.site/dashboard>.

4.8 We provide a summary of the points raised through the consultation, and the Applicants responses, below.

Issue	Applicant's response
Noise and disturbance	Disturbance from noise, dust and traffic will be mitigated by a construction management plan as part of the planning condition. Furthermore, modern construction methods tend to have less impact on its neighbours. The contractor appointed will be a member of the Considerate Construction Scheme.
Impact on daylight/sunlight of neighbouring properties	A daylight and sunlight assessment has been undertaken by a RICS Daylight and Sunlight surveyor which confirms that the impact of the proposed building is acceptable.
Inappropriate location	Planning policy dictates that brownfield sites should be prioritised.
Impact on privacy	Impact on privacy will be minimal since all windows facing the gardens will be opaque up to 1.7m height.
Local need	The applicant has undertaken market research on the demand for office space in the London Borough of Haringey and determined that there is sufficient local demand for this development.

CONSULTATION FEEDBACK RESPONSES

POST SUBMISSION REVISIONS

- 4.9 Following the submission of the planning application in April 2023 (LPA Ref: HGY/2023/0464), the applicant and project team have continued to engage proactively with the Local Planning Authority. This has included officer discussions and the submission of a Design and Access Statement Addendums to clarify, justify and, where necessary, refine elements of the scheme. The amendments are described below and summarise how the proposals have responded positively to officer comments.

Original Submission (March/April 2023)

- 4.10 The original submission proposed a high-quality office-led redevelopment of the former car wash site at Broad Lane. The scheme established office (Class E) use, expanding upon an extant implemented permission on the site, within a stepped massing strategy ranging from four storeys at Broad Lane and adjacent to Esin Court, up to a taller element located toward the industrial edge of the site. A strong brick-led architectural language informed by local residential and industrial character. Active frontages to Broad Lane and the side access road, improved pedestrian environment, and comprehensive sustainability measures including green roofs and PV panels were also proposed.

Officer Meeting and Quality Review Panel (July – September 2023)

- 4.11 A formal video meeting was held with LPA officers to review the submitted scheme. The discussion focused on detailed design and access considerations including the width of the access road and relationship with the proposed pavement, the robustness and flexibility of cycle parking provision,

the ground floor frontage height and its relationship to Esin Court, the treatment of the Broad Lane corner and flank wall adjacent to residential properties, and the siting and justification of the taller element adjacent to the industrial area.

Response to Quality Review Panel (April 2024)

- 4.12 The application proposals were referred to the Haringey Quality Review Panel and in-person Formal Review Meeting was held 15th November 2023. Attending the meeting were representatives of the Haringey planning department, the agent, the Architect and members of the review panel. The Report of Formal Review Meeting was then issued by the Review Panel.
- 4.13 The QRP felt the five storey element on the corner was overbearing and suggested a block of three storeys high with a further setback. The massing was revised on this recommendation. The QRP recommended up to 6 story for the taller element. The design was revised incorporating up to 7 storeys to the rear which was considered appropriate in the context.
- 4.14 The QRP sought a more positive street level experience through its frontages. The street level was improved by recessing large glazed shop front windows at ground floor and introduce planters and small trees, and improve the legibility of the primary entrance with a projecting bronze frame around the main entrance. Warehouse style windows were also incorporated across the facades relating to the industrial backdrop of the site setting.
- 4.15 The floor to ceiling heights were increased to 2.7m, with large windows lighting a contemporary workspace, with exposed services. A goods lift was added to provide direct access to street and further increase the flexibility of all floors for wider class E uses, e.g. light industrial uses.
- 4.16 The revisions also incorporated a 135sqm roof garden for employees on the 6th floor, together with associated planting.
- 4.17 The proposals also integrated a blue badge space for visitors which maintaining a large cycle store. A mobility charging point was also added to the storage area.

Post QRP/Mid Application Officer Meeting (March 2025)

- 4.18 Following the QRP and revisions made to the application, Haringey offered a mid-application meeting to better balance the views of officers, stakeholders, and the QRP. An in-person meeting was held 11th September 2024, attending by representative of Haringey Planning Dept, the applications agent and architect.
- 4.19 Of high importance was the prospect of a future northward extension of Fountayne Road which would cross the eastern end of the subject site. To facilitate this, the design was changed to move the taller element west by one full bay (5m). Officers advised that this offset could be supported by some additional height. The proposed height was therefore increased from 7 storey to 9 storey, which is as per the original submitted number of storeys. The resultant change in GIA is from 5000sqm to 4938sqm, a reduction of 62sqm.
- 4.20 The floor to ceiling height was also increased, from 2.7m, to 2.9m. The overall architectural language remains consistent notwithstanding the changes in height. To maintain a proportionally taller ground floor as a visual base, the floor to ceiling of the ground floor was also increased from 3, to 3.1m. All resulting changes in form and massing were re-assessed by daylight sunlight consultants, which confirmed that the amendments resulted in no additional impacts.



FIGURE 04 - PROPOSED BUILDING VIEWED FROM BROAD LANE (BEFORE PRE-APP) FIGURE 05 - PROPOSED BUILDING VIEWED FROM BROAD LANE (AFTER PRE-APP)

- 4.21 The shifting of the built form has allowed the reserved area (for the future potential extension of Fountayne Road), to become open space. The open space is proposed to be landscaped with planting/grass. To further improve this open space, the internal use of the ground floor at the eastern end of the site is envisaged as Class E café type use. Accordingly, large format windows at ground floor were introduced to create a visual connection between the internal function and open space.
- 4.22 The blue badge bay was also relocated, from off-site onto the application and within the building envelope at ground level. A motorised shutter door provides access and security to this space. We provide a tabulated summary below:

Topic	Comment	Applicant Response
Engagement with other landowners in the area	The panel encouraged the Council to initiate discussions with other landowners to develop a masterplan for the wider South Tottenham Industrial Estate to ensure coordinated redevelopment and improved permeability.	The applicant has shown flexibility to accommodate a future masterplan by adjusting the design to anticipate a potential northward extension of Fountayne Road (DAS Addendum 3). Regeneration officers ("Pre-App" Sept 2024) reiterated the importance of flexibility and gradual development in line with a coordinated masterplan approach.
Permeability of the site	The QRP expressed concern about the lack of permeability and open space, suggesting provision for a future north-south connection and greater integration with the surrounding street network.	The applicants had initially enhanced permeability through recessed ground-floor frontages, landscaped edges and active frontages that improved visual openness (Addendum 2). Then, Officers (in "Pre-App"

		Sept 2024) supported the relocation of the taller block westward, freeing the eastern part of the site for landscaped open space, allowing for a future north-south link. This ensures flexibility for a future permeable street network and small pocket public spaces (Addendum 3).
Masterplan integration	The panel advised that, in the absence of an approved masterplan, a more cautious approach should be taken to ensure the proposal integrates sensitively with existing and future contexts.	As above, the applicant agreed, modifying the footprint to enable future road alignment and open space (Addendum 3). Officers later confirmed the footprint now maximises the site but requested it remain adaptable to future master planning and potential height increases through coordinated redevelopment.
Height and massing	The QRP felt the nine-storey height was excessive, suggesting a maximum of 5–6 storeys to relate better to the surrounding residential context. The massing was seen as overbearing, particularly adjacent to Esin Court.	The proposals initially reduced the height of the western block adjacent to Esin Court and lowered the overall building (DAS Addendum 2). However, following “Pre-App” feedback, Addendum 3 adjusted massing by shifting the taller element westward and refining its proportions. Officers (at “Pre-App” Sept 2024) supported a 9-storey height within a broader masterplan and encouraged increased floor-to-ceiling heights to improve workspace quality.
Public realm	The QRP considered the proposal overly reliant on a private road for servicing and recommended reducing the building footprint to allow self-sufficient servicing,	The proposals were initially revised to redesign the ground floor, to create a more active and welcoming street frontage. Recessed

	blue badge parking, and more public realm.	glazing, planters and a well-defined main entrance enhance the building's relationship with Broad Lane were shown (Addendum 2). However, post "Pre-App" (Sept 2024) Addendum 3 incorporates on-site blue badge parking within the building envelope and new landscaped space to the east. Regeneration officers requested introduction of pocket public spaces and an active ground floor (e.g. café/community space) to enhance public realm and accessibility, which has been accommodated to the rear of the site, alongside soft landscaped public realm.
Workspace	The panel encouraged provision of flexible, creative workspaces with sufficient ceiling heights and natural light, to attract maker and creative industries.	Addendum 3 increased floor-to-ceiling heights from 2.7m to 2.9m, improving daylight and flexibility. The internal layout now allows subdivision into 19 self-contained units (indicatively, although there are other permutations reflecting future flexibility). Regeneration officers highlighted borough demand for self-contained ground floor units with direct street access; this flexibility has been incorporated.
Amenity space	The panel criticised the absence of outdoor amenity for occupants and recommended roof terraces or other areas to improve wellbeing and provide respite.	The applicant introduced green roof space of 712 sqm and landscaped open space to the east (DAS Addendum 4). These provide ecological and visual amenity benefits consistent with

		the QRP's recommendations.
Inclusive and sustainable design	The QRP encouraged windows on blank façades, integration of natural ventilation, and high sustainability standards.	DAS Addendum 4 details LETI-aligned passive design, solar control glazing, natural ventilation, and external shading. Energy officers requested further PV panels, reduced active cooling, and native planting; these have been addressed via increased PV provision and a native wildflower roof system.
Architecture	The QRP considered the industrial aesthetic broadly successful but encouraged refinement of the Broad Lane elevation and material variation to reflect Tottenham's creative character.	DAS Addendum 3 retained the elegant industrial language while refining window proportions and adding articulation. Officers ("Pre-App" Sept 2024) welcomed a more distinctive, creative façade expression referencing local industrial materials.
Transport and highways	The panel raised concerns about reliance on the private access road for servicing and parking.	DAS Addendum 3 now provides internal blue badge parking, relocated cycle storage, and clear servicing strategy.
Energy and sustainability	The panel encouraged strong sustainability credentials and integration of natural ventilation and low-carbon energy solutions.	DAS Addendum 4 includes detailed Overheating, Energy, and BREEAM updates, expanded PV coverage, and air source heat pumps with acoustic screening. Energy officers requested a revised baseline per GLA guidance, lower embodied carbon materials, and confirmed support for increased PV and green roofs. Further detailed responses in regard to energy/sustainability have since been provided

		demonstrating compliance.
--	--	------------------------------

Final Responses (October 2025)

- 4.23 Haringey officers requested that additional PV panels be considered to maximise the potential of the roof space. A total of 38 PV panels is proposed. Additionally, the location of the proposed ASHPs were confirmed on the roof plan (8th floor) at the east of the Site and housed within acoustic enclosure to ensure no visual or noise impacts would arise.

5.0 THE PROPOSED DEVELOPMENT

- 5.1 This section should be read alongside the enclosed Design and Access Statement prepared by the project architects, Mark Smith Architects. We provide a summary of the proposed development below.
- 5.2 The proposal will expand on the existing implemented office approval and provide 4,938sqm (GIA) of new, much needed, high quality, flexible and multi-functional office space. The proposals will greatly improve the efficiency of the land and make best use of this previously developed land. All spaces are fully accessible with lift access to all floors.
- 5.3 The proposed building is of high architectural quality with elegant brick detailing and green roofs. It has been purposefully designed to ensure that it integrates into the surrounding context and street scene.



PROPOSED VIEW FROM BROAD LANE LOOKING SOUTH

- 5.4 The lower massing element is three storeys with a setback fourth storey, adjacent to the terraced housing on Broad Lane. The massing of the proposal gradually steps up in height towards the west terminating in a taller elegant tower.
- 5.5 The upper storeys at the west and middle sections are set back to create a vertical hierarchy for a complete urban composition.
- 5.6 The proposal addresses the urban context and creates a new active frontage to the side street off Broad Lane which will improve the space immediately in front of the building. The corner between the two primary elevations is chamfered to highlight the building entrance.

- 5.7 A variety of high-quality brick tones reflect the principal material character of the area. Brown brick on the lower section facing the residential area integrates the proposal into the existing Broad Lane streetscape.



PROPOSED VIEW FROM BROAD LANE LOOKING NORTH

- 5.8 Lighter bricks are used on the taller element picking up the lighter tones of the industrial area to the east. The setback upper storeys are clad in high-quality metal (in natural metal tones) which adds another layer of variety and interest to the building and streetscape.



PROPOSED VIEW FROM OPPOSITE TAMIL HOUSE

- 5.9 The proposed building is energy efficient, well insulated, and also generates on-site electricity through PV panels on the roof.
- 5.10 The building has been designed to deliver a reduction on carbon emissions that exceeds the requirements under Building Regulations and achieves an Excellent BREEAM sustainability rating. Energy efficient and low water-use fittings will be installed throughout, and recycling and re-use will be encouraged through separate waste storage facilities. A sustainable urban drainage system in the form of a green roof will delay storm water to reduce impact on flooding in the local area.
- 5.11 Given the excellent PTAL rating of the Site, the proposed scheme will be delivered as car-free. The provision of an internal cycle store will support sustainable transport options and reduce road pollution.

6.0 RELEVANT PLANNING FRAMEWORK

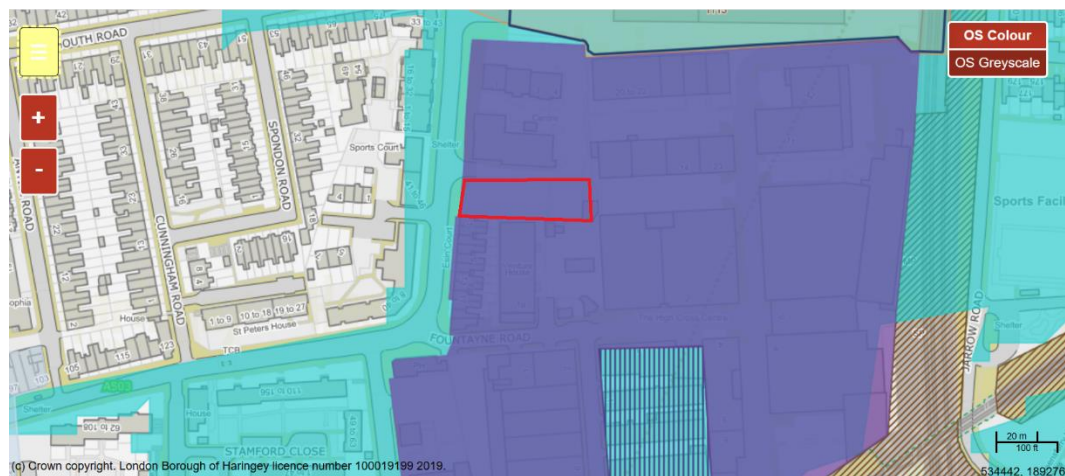
6.1 At the time of submission (April 2023), the relevant planning policy framework for this application comprises the following:

- NPPF (National Planning Policy Framework) (2021)
- NPPG (National Planning Policy Guidance)
- London Plan (2021)
- Haringey's Development Management Plan DPD (2017)
- Haringey Strategic Policies DPD (2013)
- Supplementary Planning Documents (SPDs)
(Sustainable Design and Construction, Planning Obligations, etc)
- Tottenham Area Action Plan (2017)
- New Local Plan (2022- 2037) (Draft)

6.2 Since the application was first submitted, the NPPF has been updated (2024), however the London Plan and Local Plan remain unaffected.

6.3 In accordance with the Council's Proposals Map (extract below), the Site is subject to the following designations.

- Locally Significant Industrial Site (purple)
- Flood Zone 2 (blue)
- Tottenham Area Action Plan (AAP)



**HARINGEY PROPOSALS MAP EXTRACT
(SITE EDGED RED)**

7.0 PLANNING ASSESSMENT

7.1 Having regard to the proposed development, pre-application advice and the relevant local plan policies, the principal material considerations are:

	Page No.
a. Principle of Development	22
b. Design	27
c. Landscaping, Biodiversity and UGF	29
d. Neighbouring Amenity	30
e. Highways and Transport	31
f. Energy, Sustainability and Overheating	34
g. Drainage and Flood Risk	35
h. Air Quality	36
i. Fire	37
j. Planning Benefits	37

7.2 We assess each matter in turn below.

a. Principle of Development

7.3 The purpose of the planning system is to contribute to the achievement of sustainable development. The NPPF (2024) paragraph 10 states that, ***‘so that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development’***.

7.4 Plans and decisions should apply a presumption in favour of sustainable development. For decision-taking this means ***“approving development proposals that accord with an up-to-date development plan without delay; or where there are no relevant development plan 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 the Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or 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”***.

7.5 Chapter 6 of the NPPF addresses the need for building a strong, competitive economy. Paragraph 85 states that ***“decisions should help create the conditions in which businesses can invest, expand, and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development”***.

7.6 Paragraph 87 adds that ***“Planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative, or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations”***.

7.7 The London Plan reiterates the objectives of the NPPF, supporting sustainable development. Policy GG2 (making best use of land) states that to create successful sustainable mixed-use places that make the best use of land, those involved in planning and development must ***“enable the development of brownfield land, prioritise sites which are well-connected by existing or planned public transport, proactively explore the potential to intensify the use of land to support workspaces, promoting higher density development, particularly in locations that are well-***

- connected to jobs, services, infrastructure and amenities by public transport, walking and cycling”.*
- 7.8 With specific regard to economic uses, Policy GG5 (growing a good economy), states that to conserve and enhance London’s global economic competitiveness, development must **“plan for sufficient employment and industrial space in the right locations to support economic development and regeneration”**.
- 7.9 London Plan Policy E1 (offices) states that Improvements to the quality, flexibility, and adaptability of office space of different sizes (for micro, small, medium-sized, and larger enterprises) should be supported by new office provision, refurbishment and mixed-use development.
- 7.10 With more specific regard to LSIS’s, the London Plan, Policy E6 (Locally Significant Industrial Sites) states that boroughs should designate and define detailed boundaries and policies for Locally Significant Industrial Sites and make clear the range of industrial and related uses that are acceptable in LSIS including, *“where appropriate, hybrid or flexible B1c/B2/B8 suitable for SMEs and distinguish these from local employment”*.
- 7.11 London Plan Policy E7 (Industrial intensification, co-location, and substitution) further states that development Plans and development proposals should *“be proactive and encourage the intensification of business uses in Use Classes B1c, B2 and B8 occupying all categories of industrial land through introduction of small units, development of multi-storey schemes, addition of basements and more efficient use of land through higher plot ratios and mitigating impacts on the transport network where necessary”*.
- 7.12 At a local level, Haringey’s Local Plan Strategic Policies DPD Policy SP8 (employment) echoes the NPPF and the London Plan, seeking to secure a strong economy in Haringey and protect the Borough’s hierarchy of employment land, including Locally Significant Industrial Sites. **The policy advises that the forecast demand is for an additional 23,800 m2 of B Class floorspace up to 2026. The policy suggests that the forecast demand is to be met through a number of ways including the intensification of the use of existing employment sites and the provision of B1a/b floorspace as part of mixed-use development on suitable sites.**
- 7.13 Within Locally Significant Industrial Sites the Council will safeguard the sites for a range of industrial uses (B1 (b), (c), B2 and B8) where they continue to meet demand and the needs of modern industry and business. The supporting paragraph at 5.1.12 of the Plan notes that in line with the 2014 Employment Land Study, the Council will protect these areas to provide choice and flexibility in employment land. *“The Council will look at opportunities to improve and enhance the general environment of these areas and buildings”*.
- 7.14 Development Management Policy DM37 (maximising the use of employment land and floorspace) adds further weight to the above, noting that within LSILs, that proposals for the intensification, renewal, and modernisation of employment land and floorspace will be supported where the developments, amongst other aspects, are designed to allow for future flexibility of use including subdivision and/or amalgamation to provide for a range of business types and sizes, including small businesses.
- 7.15 With regard to the Tottenham Area Action Plan (AAP), Policy AAP4 (employment) states that *‘Within the Tottenham AAP area, the Council will facilitate the regeneration and renewal of selected Designated Employment Areas (DEAs) through a reconfiguration of the local employment offer in order to intensify land uses, maximise the amount of business floorspace and premises, and to increase the number and variety of jobs’*. This includes (d) supporting development proposals

for B1 Office use in Tottenham Hale. The Site falls with Designated Employment Area 10 (DEA10 – South Tottenham). AAP4 acknowledges that *‘it is imperative that the Council proactively facilitates a step-change in the local employment offer, particularly to expedite economic development.’*

- 7.16 The Site already benefits from an extant permission for office use. The principle of utilising the Site for office use is therefore established and supported. The proposed development will expand on that existing approval and provide a total of 5,694sqm of new, much needed, high quality flexible Class E space, which the applicants see going hand-in-hand with the planned intensification of the wider surrounding area.
- 7.17 The impact of COVID-19 and the pressure of a global economic downturn has affected high streets, local businesses, and the ability of residents to access jobs. Early indicators show Haringey is already experiencing the highest rise in unemployment across Central London – and we know that this is likely to compound pre-existing inequalities for local people.
- 7.18 In early March 2020, the council made progress in implementing the Borough Plan; ‘Economy’ and ‘Place’ priorities, building on the adoption of the Community Wealth Building Strategy in October 2019. Part of the strategy includes supporting the provision of new, flexible employment space.
- 7.19 According to the Haringey Economic Development Strategy, 2015, recent employment growth in the borough has been relatively slow; Haringey is the sixth slowest growing borough in London over the last five years. Employment is projected to continue growing, albeit at a rate of growth below the London level. Evidence in the Haringey Employment Land Study (which draws on a range of GLA, Atkins and Experian employment projections), expects that between 3,070 and 22,000 new jobs are expected to be created over the next 18 years.
- 7.20 Haringey’s business base is dominated by SMEs, with the number of businesses employing less than 250 employees accounting for 99% of all businesses in the borough. The development of new businesses within Haringey is important for sustaining the area’s economic vitality and supporting the growth of the economy.
- 7.21 According to the Haringey Workspace Viability Assessment (2014), since the most suitable workspace types for the borough are of B1 and B8 classification, forecasts of strong growth in office and warehouse sector would justify workspace expansion.
- 7.22 The demand projections for B use class floorspace need from the 2015 Haringey Employment Land Review are demonstrated in the table below. In the below scenario, the forecasted increase in total floor space demand between 2011-31 is driven by demand growth in B1a/b and B8 floorspace.

- 7.23 Accordingly, forecasts suggest growing demand for Class E (office) type space, with the trend analysis predicting future decline of light industrial and warehousing space. There is a demonstrable need to secure more affordable, secure and flexible workspace.

Use Class	2011	2021	2031	Change (2011-31)
B1a/b	226,600	294,000	329,200	102,600
B1c/B2	99,700	93,600	82,800	-16,900
B8	309,500	378,500	421,900	112,400
Total	635,800	766,100	833,900	198,100

B USE CLASS FLOORSACE NEED (SQM) IN HARINGEY, 2015
[SOURCE: HARINGEY ECONOMIC DEVELOPMENT STRATEGY, HATCH REGERNIS, 2015]

- 7.24 The proposed development aligns with the Council’s vision and will greatly improve the efficiency of the land and make best use of this previously developed land, which also benefits from very good levels of transport access. Policy D2 of the London Plan notes that the density of development

should be proportionate to the site's connectivity and accessibility. It will also support the regeneration of Tottenham towards a highly successful place by attracting new business and job opportunities in a location with excellent public transport connections.

- 7.25 Furthermore, in accordance with DM37, the new business floorspace has been designed to both support growth and respond to changing economic circumstances. The proposals incorporate flexible design features, e.g. large open floorplates, to ensure that the development is adaptable to the needs of a range of employment uses and end users over its lifespan. This is especially important to support the growth of smaller and new start-up businesses. As noted above and referenced in DM37, local evidence indicates that Haringey has a strong concentration of Small and Medium Sized Enterprises (SMEs) including in the knowledge-based, creative, and cultural sectors. SMEs perform a key role in the economy and local job offer and it is necessary to ensure a sufficient supply of premises for them, which the proposals achieve.

- 7.26 The increase in office floorspace will result in a significant uplift in potential employment numbers. Based on the HCAs Employment Density Guide (3rd Edition, 2015) we have estimated employment numbers based on the proposed floorspace. It is estimated that there is the potential of circa 411 'employees' within the proposed development. Calculation below.

Proposed total GIA (offices) = 4,938sqm.

*Office employment density of 1 employee per 12sqm (as per density matrix)
= **411 employees***

- 7.27 In summary, the significant increase in employment floorspace, and the significant uplift in employee opportunities, should be very strongly supported.

Flexibility of Use within the LSIS

- 7.28 Whilst the Applicant's clear intention is to use the building predominantly as office accommodation such as a co-working space, small office space, etc. they seek to retain full Class E flexibility across the floorspace proposed. This reflects both operational needs and the Government's purpose in introducing Class E which is to support adaptable, modern employment space.

- 7.29 The Site already benefits from an implemented consent (HGY/2016/2232, lawfully commenced under HGY/2020/1013), which imposes no restriction on the type of employment use. That permission therefore establishes a lawful fallback for unrestricted Class E activity. The current proposal simply builds upon this established position, improving the quality and intensity of the employment floorspace while maintaining the same degree of policy-compliant flexibility. Imposing a restriction now to just offices (Class E(g)(i)) would be inconsistent with the lawful fallback and unnecessarily limit the flexibility that both planning policy and the site's existing implemented consent allow. Accordingly, the applicant does not invite a condition that would limit the scope of full Class E use as applied for.

- 7.30 The proposal accords with Policy DM37 by optimising previously developed land within a Locally Significant Industrial Site, delivering a substantial uplift in high-quality, sustainable employment floorspace. The building has been designed to maximise flexibility, with open floorplates capable of sub-division or amalgamation, ensuring it can accommodate a broad range of occupiers, from SMEs to established businesses, and respond to future market needs. Its strong sustainability credentials (BREEAM 'Excellent') and active frontage will enhance both the local environment and the overall quality of workspace within the LSIS. Retaining unrestricted Class E use is essential to securing long-term viability, investment confidence, and sustained employment activity. In a rapidly changing market, flexibility is key to ensuring early occupation, ongoing job creation, and

alignment with the Council's own economic development strategy, which promotes adaptable, market-responsive workspace. We provide a detailed assessment against DM37 below.

Meeting the Needs of Modern Industry and Business (Criterion a)

- 7.31 London Plan Policy E6 and Haringey Strategic Policy SP8 require LSIS land to respond to the needs of modern industry and business, including flexibility, intensification and improved quality of employment space. The proposed development directly satisfies this objective by delivering high-quality, multi-storey, flexible Class E floorspace with generous floor-to-ceiling heights, open and adaptable floorplates, goods lift provision and robust servicing arrangements. These characteristics align with Policy DM37, which supports the renewal and modernisation of employment land where schemes are designed to accommodate changing business needs and a range of occupier types, particularly SMEs. The proposal therefore represents a policy-compliant evolution of employment provision rather than a departure from industrial objectives.

Supporting the Continued Functioning of the LSIS (Criterion b)

- 7.32 The proposal accords with London Plan Policy E6 in that it supports the LSIS as a predominantly industrial and commercial area. The scheme delivers a significant uplift in employment floorspace compared to both the former use and the extant implemented consent, while retaining full Class E flexibility capable of accommodating light industrial, studio, maker and office-based uses, and complementary uses (e.g. the café fronting the open space to the rear of the site). The architectural language, servicing strategy and spatial configuration respond positively to the Site's industrial context, ensuring the development strengthens rather than dilutes the employment character and functionality of the LSIS.

Strategic Economic Benefits (Criterion c)

- 7.33 The development delivers clear strategic economic benefits at a borough-wide level, consistent with London Plan Policy GG5 and Tottenham AAP Policy AAP4, both of which seek to maximise employment capacity and job creation in accessible locations. The scheme provides a substantial quantum of modern employment floorspace in a highly sustainable location with excellent public transport accessibility, supporting business growth, inward investment and long-term economic resilience. This directly responds to identified shortages of flexible, high-quality workspace in Haringey and supports the Council's economic development and regeneration objectives for Tottenham Hale and the wider borough.

No Compromise to Strategic Employment Land Supply (Criterion d)

- 7.34 In accordance with London Plan Policy E7 and Haringey Policy DM37, the proposal does not result in the loss of strategic employment land or floorspace. The Site already benefits from an implemented employment permission, and the proposal intensifies and optimises employment use through a more efficient, multi-storey form. As such, the scheme contributes positively to meeting strategic employment land requirements, reinforcing rather than undermining the borough's employment land supply.

Compatibility with Surrounding Employment Uses (Criterion e)

- 7.35 The proposal has been carefully designed to ensure it would not restrict, prevent or prejudice the continued operation of adjoining or nearby employment uses, in line with Policy DM37. Servicing arrangements, building layout and massing ensure operational compatibility, while the taller element is appropriately located adjacent to industrial uses rather than sensitive residential interfaces. The proposed Class E uses are inherently compatible with the surrounding commercial and industrial activities and will reinforce the vitality and viability of the wider LSIS.
- 7.36 In summary, having regard to the above, the proposal clearly accords with the strategic intent of London Plan Policies E6 and E7, Haringey Strategic Policy SP8, Development Management Policy

DM37, and Tottenham AAP Policy AAP4, delivering modern, intensified and flexible employment floorspace that supports economic growth while safeguarding the operational integrity of the LSIS.

b. Design

- 7.37 Paragraph 131 of the NPPF states that *“The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.”*
- 7.38 The above is reiterated in the London Plan, particularly Policy D3 (Optimising site capacity through the design-led approach), which states that *“all development must make the best use of land by following a design-led approach that optimises the capacity of sites, including site allocations. Optimising site capacity means ensuring that development is of the most appropriate form and land use for the site. The design-led approach requires consideration of design options to determine the most appropriate form of development that responds to a site’s context and capacity for growth, and existing and planned supporting infrastructure capacity. Higher density developments should generally be promoted in locations that are well connected to jobs, services, infrastructure, and amenities by public transport, walking and cycling”*.
- 7.39 Policy DM1 of the Development Management Plan: Delivering High Quality Design states that the Council will support design -led development proposals which are appropriate in scale, height, mass, bulk, and form, to its site and context. New developments must complement the existing streetscape rhythm and ensure the architecture language is coherent.
- 7.40 Policy DM6 (building heights) adds that for all development, the Council expects building heights to be of an appropriate scale which respond positively to the site’s surroundings, the local context, and the need to achieve a high standard of design in accordance with Policy DM1. Proposals for taller buildings that project above the prevailing height of the surrounding area must be justified in urban design terms.
- 7.41 The proposed development is supported by a detailed Design and Access Statement, and a Tall Buildings Assessment, prepared by the project architects, Mark Smith Architects. Please refer to those documents for a detailed assessment of the proposals in design terms. We provide a summary below.
- 7.42 The proposed office building is of high architectural quality with elegant brick detailing, green roofs and PV panels. It has been purposefully designed to avoid negatively impacting nearby properties and attention has been given to ensure that it integrates into the surrounding context. At the west of the Site, facing Broad Lane, the proposed building is three storeys fourth set-back storey. Towards the middle of the Site, it is five storeys, with set back sixth, and at the east of the Site, it is nine storeys.



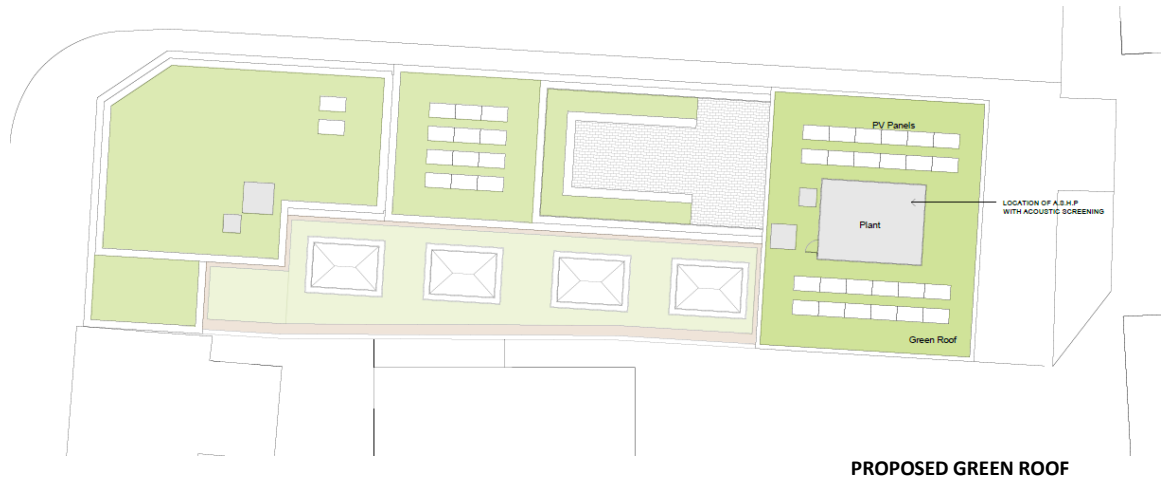
PROPOSED VIEW FROM BROAD LANE

- 7.43 The design addresses the urban context and creates a new active frontage facing Broad Lane and the side street off Broad Lane which will improve the space immediately in front of the building. The corner between the two primary elevations is chamfered to highlight the building entrance. The footprint follows the existing boundary on all sides, consistent with the extant consent, defining the public realm.
- 7.44 The height directly abutting the adjacent house (no.1 Esin Court) is four storeys so that it reads as complementary to that context.
- 7.45 The notion of gradual massing steps is continued to the middle of the site. The gradual building up of massing leads to the taller element at the far east of the Site, which terminates the view from Broad Lane. This part of the Site has no directly abutting residential buildings and faces industrial and commercial areas. The taller element is deliberately positioned next to the industrial area to avoid overshadowing residences and gardens and is set back from the principal road frontages.
- 7.46 Whilst the Site falls just outside of the broad locations where 'tall buildings' are directed (Figure 2.2 of the DM DPD), it does sit to the south and immediate east of the locations where tall buildings are promoted. The proposals are considered to make an appropriate response to the site context and the emerging character. Furthermore, in accordance with DM6(c), the proposals represent a landmark building which by its distinctiveness will act as a way finder/marker to the LSIS. The design is also considered to be elegant and well proportioned, and visually interesting when viewed from any distance or direction. The proposals have also been designed to positively engage with the street environment.
- 7.47 The above is further supported by the AAP4 which notes that Taller buildings will be appropriate along parts of Broad Lane, responding to the prevailing mid-rise character, and in some cases promoting intensification, increasing heights from low-rise to mid-rise where appropriate.

- 7.48 The proposed elevations have a clear vertical hierarchy. Proportionally, a taller base establishes the ground floor along with large, glazed areas and deep lintels. The first and second floors have taller windows beneath a single storey of smaller windows (at third floor). Finally, the top storey is set back, and in a visually lighter material, to form a complete urban composition.
- 7.49 Window openings are no taller than a single storey to form a comprehensible scale. Upper floor windows are in pairs, continuing the rhythm established by the pairs of first floor windows in the row of existing houses adjacent (Esin Court). Additional architectural details introduce further definition along the front/side elevation such as a projecting header course above the ground floor level and projecting vertical brickwork lintels above windows.
- 7.50 With regard to materials, within the local area, buildings are most frequently built of bricks in yellow, brown, and blue colours. There are many instances of metal cladding in natural or powder coated finishes. There is no typical window material as there are many examples of steel, timber, aluminium, and plastic windows. Low-rise residential and some mid-rise residential/ commercial building have pitched tiled roofs. Older industrial buildings have pitched (often saw-tooth) tiled roofs whereas the more recently built have metal roofs.
- 7.51 The proposal includes a variety of high-quality brick tones that reflect the principal material character of the area. Brown brick is on the Broad Lane corner piece facing the residential area to integrate the proposal into the existing Broad Lane streetscape. Lighter bricks are used on the taller element picking up the lighter tones of the industrial area to the east. The set back upper storeys are clad in high-quality metal (in natural metal tones) which adds another layer of variety and interest to the building and streetscape.
- 7.52 In summary, the proposals are considered to represent a very high-quality response to the established and emerging contexts and will make a very positive contribution to the local streetscene.

c. Landscaping, Biodiversity and UGF

- 7.53 Local Policy DM1 (delivering high quality design) requires development proposals to demonstrate how landscaping and planting will be integrated into the development as a whole.
- 7.54 The proposed development continues the established built footprint of the extant consent, completing the urban block. Accordingly, the proposals include for a substantial green roof across the development, which will promote biodiversity and create habitat for insects, birds and bats. The open space to the rear of the site will also accommodate a further area of useable landscaped space.
- 7.55 New greenery will add a significant ecological benefit to the Site which was previously and currently mostly impermeable hard surfaces (former car wash). The soft landscaping will include and promote native and pollinator plant species. In addition, soil and plant shading will protect the roof and evaporate water creating a cooling effect, and in winter providing an insulating effect which reduces heating demand.
- 7.56 The green roof will also capture excess rainwater before entering the drainage system and delay permeating rainwater to reduce risk of stormwater flooding (see drainage later in this section).



- Urban Greening Factor*
- 7.57 Policy G5 of the London Plan requires major development proposals to contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage.
- 7.58 The significant area of green roofs proposed will ensure that the proposals not only meet but significantly exceed the policy target of 0.3 UGF for commercial developments, with the development achieving 0.49. The relevant calculation is provided below.

Extensive green roof (substrate of 150mm min), value = 0.8.

Area of Green Roof = 712 sq m

Perennial Planting, value = 0.7

Ground Floor Landscaping = 79sqm

Site Area = 1265 sq m

0.8×712 (area of green roof) = 0.7×79 (are of ground floor planting) / 1265 (site area) = **0.49**

Biodiversity Net Gain

- 7.59 Whilst the application pre-dates the requirements for a statutory BNG, the proposals includes for 712sqm of new green roof that will promote biodiversity and create habitat for insects birds and bats. New greenery will add a significant ecological benefit to a site which was previously mostly impermeable hard surfaces.

d. Neighbouring Amenity

- 7.60 Local Plan Policy DM1(d), requires development proposals to ensure a high standard of privacy and amenity for the developments users and neighbours. The Council will support proposals that provide adequate daylight/sunlight and open aspects and provide appropriate amounts of privacy.
- 7.61 The design development has gone through an extensive design review process involving close collaboration with the client, planning consultant and daylight and sunlight consultants, Rights of Light Consulting, to mitigate any issues relating to daylight and sunlight received by residential neighbours.

- 7.62 The proposed development is north of the two-storey houses on Esin Court, and therefore is not directly overshadowing these houses from sunlight. Nevertheless, the design process included on-going assessments and reviews to ensure that the massing and design is appropriate in this regard. The depth of the proposal and the large massing 'cut-out' from first floor up is a deliberate move to mitigate (1) the impact in relation to outlook and, (2) the impact on access to daylight, for the immediate neighbour (no.1 Esin Court) and other houses on Esin Court.
- 7.63 The proposed massing has also been conscious of avoiding potential overbearing development. The taller element of the proposal is therefore deliberately positioned at the very rear of the Site where the Site neighbours commercial/industrial units.
- 7.64 Furthermore, eight proposed windows that could potentially overlook parts of the rear gardens of Esin Court are opaque to avoid potential perception of overlooking.
- 7.65 The proposed development has been assessed in detail by Rights of Light Consulting, a copy of their assessment is submitted herewith. Their assessment is based on the various numerical tests laid down in the Building Research Establishment (BRE) guide 'Site Layout Planning for Daylight and Sunlight: a guide to good practice. The assessment has considered the impact of the development on the light receivable by the neighbouring properties at 1 to 14 & 41 to 55 Bramble Close, 143 Broad Lane, 15 and 16 The High Cross Centre, 1a Fountayne Road, Broad Lane Campus and Unit 1 High Cross Centre. No1a Fountayne Road, Broad Lane Campus, 15 & 16 The High Cross Centre and Unit 1 High Cross Centre appear to be non-domestic buildings which do not have a requirement for daylight or sunlight.
- 7.66 The results demonstrate that the proposed development will have a low impact on the light received by its neighbouring properties. Considering the overall high level of compliance with the BRE recommendations, Rights of Light Consulting conclude that the proposed development will have an acceptable impact on daylight and sunlight and that in our professional opinion, there is no daylight or sunlight related reason why planning permission should not be granted for this scheme.

e. Highways and Transport

- 7.67 Policy T1 'Strategic Approach to Transport' of the London Plan states that 'A) Development Plans should support, and development proposals should facilitate: 1) the delivery of the Mayor's strategic target of 80 per cent of all trips in London to be made by foot, cycle, or public transport by 2041 2) the proposed transport schemes set out in Table 10.1 of the London Plan. All development should make the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking and cycling routes, and ensure that any impacts on London's transport networks and supporting infrastructure are mitigated.
- 7.68 A Healthy Streets Transport Statement, Travel Plan, Delivery and Servicing Management Plan and Outline Construction Logistics Plan have been produced by Ardent Transport Engineers, submitted herewith.

Car Parking

- 7.69 Policy T6 of the London Plan states "*Car-free development should be the starting point for all development proposals in places that are (or are planned to be) well-connected by public transport, with developments elsewhere designed to provide the minimum necessary parking ('car-lite'). Car-*

free development has no general parking but should still provide disabled persons parking in line with Part E of this policy”.

- 7.70 In relation to the development, office parking is recognised within T6.2, highlighting that *“In well-connected parts of outer London, including town centres, in close proximity to stations and in Opportunity Areas, office developments are encouraged to be car-free.”.*
- 7.71 The proposals comprise a ‘car-free’ development with zero allocation for parking, with the exception of 1 x disabled parking space accommodated on site. This level of parking is considered suitable given the Site has excellent accessibility to non-car modes of transport and is located within a PTAL of 6a, which is classified as ‘Excellent’. The car free nature accords with the demand level evidenced by the Census data, which shows that 61% of people working in the area travel to work by non-car modes; and the Site is located a 1-minute walk from a high-frequency bus stop and a 6- minute walk from Tottenham Hale Station which offers a set of high frequency services for commuting purposes.
- 7.72 The Site is highly accessible for disabled users, noting the presence of disabled access on local buses as well as step free access at Tottenham Hale Station. Notwithstanding this, at the request of the Council’s highways advice, 1 disabled parking space has been accommodated onsite.

Cycle Parking

- 7.73 Cycle parking standards for the borough are stipulated within Policy DM32 of the Haringey Development Plan. This policy states that all cycle parking will be assessed in line with the standards stipulated within the London Plan. Accordingly, the development requires long and short stay cycle parking in accordance with the minimum standards outlined within the London Plan, comprising 1 space per 50sqm (long stay) and 1 space for the first 5,000sqm floorspace (GEA), with 1 additional space per 500sqm thereafter (short stay).
- 7.74 Applying the London Plan standards to the proposals , the appropriate amount of long-stay and short-stay space are provided. Cycle parking for the Site is located within the ground floor, accessible via the secondary access point on the northern frontage of the Site. The storage area provides a safe secure space for cyclists to park their cycles. In addition to this, a through door will be located near to the storage area, allowing for direct access into the office working area. the cycle stores have been designed in accordance with Chapter 8 of the TfL document ‘London Cycling Design Standards’.
- 7.75 The development provides an appropriate mix of Sheffield stands and two-tiered stands.

Deliveries

- 7.76 It is proposed that delivery and servicing for the Site will reflect the consented proposals for the site (planning application ref: HGY/2016/2232), with serving taking place from on-street along the northern boundary. Broad Lane is part of the red route network imposed by TfL. As a result of this, loading is not permitted at any point in time therefore deliveries and servicing for the Site needs to be kept to a minimum and will need to utilise the private road.
- 7.77 A framework Delivery and Servicing Management Plan (DSMP) has been prepared by Ardent Transport Engineers and submitted as part of this application. The DSMP provides full details of the proposed delivery arrangements for the proposed development.

Refuse Collection

- 7.78 In terms of refuse collection, this will also reflect the consented scheme (planning application ref: HGY/2016/2232) strategy, which involves collection to take place on a weekly basis from the northern frontage, with the bin store located within the building to facilitate collection.
- 7.79 Due regard has been given to LBH guidance, set out in their Development Management DPD within Policy DM4 'Provision and Design of Waste Management Facilities', which provides guidance for residential developments. Drawing Number 2206940-009A demonstrates that a refuse vehicle can reach within 10 metres of the refuse storage area the collection point will be located.

Emergency Access

- 7.80 Emergency access can be provided the northern and western frontages of the site. It is understood that dry risers will be located at suitable points along the upper and lower ground floors, with a sprinkler system in place throughout.

Trip Generation

- 7.81 Ardent Transport Engineers have undertaken an analysis that considers the net difference in person trips that are anticipated between the consented 1,584sqm (GIA) office development, and that proposed. The total travel demand that is anticipated to be generated during the typical weekday network peak hours (08:00-09:00 and 17:00-18:00) has been considered since at these times the network would be most sensitive to an increase in trips.
- 7.82 The net change in trips analysis indicates some uplift however, as outlined in the Transport Statement, in the peak hours there are 32 to 34 bus services per hour and approximately 40 trains per hour from Tottenham station. In the busiest peak hour, the increase of passengers on buses and on underground / trains, which if spread amongst all services, would result in an average increase of 1 bus passenger per service and 2 rail passengers per service (rounded up). Accordingly, the excellent PTAL level of the Site means that the uplift in movements to and from the Site can be easily accommodated.

Servicing Trips

- 7.83 To determine the potential servicing trip attraction associated with the Site the TRICS database has been reviewed by Ardent Transport Engineers. The level of servicing trips could be up to 7 two-way servicing movements per day. This equates to an average of up to 1 two-way movements per hour over the course of a 12-hour period. A Delivery and Servicing Management Plan (DSMP) will be implemented at the Site. This will restrict the number of vehicles that can visit the Site, and also restrict the dwell time at the Site also, with a strict booking system expected to be in place.

Travel Plan

- 7.84 A Travel Plan (TP) is submitted as part of the development proposals. The measures proposed in the TP are intended to encourage employees and visitors to use non-car modes of transport for trips to and from the development. The TP has therefore identified measures to encourage such active modes of travel and achieve the targets set out in this report.
- 7.85 A Travel Plan Coordinator (TPC) is expected to be appointed as a permanent member of staff to implement and manage the TP over the first five years of its lifespan, liaising with local providers seeking to provide employees with incentives that promotes sustainable travel. Car Share / Car

Club Promote car sharing and the locations of car club bays in the local area. Employees will be encouraged to sign up to lift sharing websites such as www.londonliftshare.com. Car club memberships could potentially be offered.

Construction

- 7.86 Policy T7 of the London Plan (2021) relates to construction and freight activity, including the requirement for CLPs to be prepared following TfL guidance in a way which reflects the scale and complexities of developments.
- 7.87 Ardent Transport Engineers were instructed to prepare an Outline Construction Logistics Plan (CLP) in relation to the proposed development, which is submitted herewith. The works associated with the development are envisaged to start in 2026 and would take up to approximately a year and a half to complete in full. Full details of construction timings will be provided within the Detailed CLP, to be secured by condition.
- 7.88 Access to the Site is feasible via a number of key strategic routes. Onward connectivity to the M11 and M25 is feasible utilising the A406 to the north, in addition to the A10. Vehicles can approach the Site from both the north and south on Broad Lane, turning right/left into the adjacent private road, and undertaking a reverse manoeuvre before leaving in forward gear. Access to the Site will be via Broad Lane to the west. It is considered that the road network will be able to accommodate the movements of construction vehicles associated with the Site.
- 7.89 Broad Lane Properties Limited are committed to suitably controlling and monitoring the build at the Site and a Detailed CLP will be prepared to provide site specific information on build as the scheme progresses.

f. Energy, Sustainability and Overheating

- 7.90 London Plan Policy SI2 (Minimising greenhouse gas emissions) requires major development to be net zero-carbon. This means reducing greenhouse gas emissions in operation and minimising both annual and peak energy demand in accordance with the following energy hierarchy; be lean: use less energy and manage demand during operation; be clean: exploit local energy resources (such as secondary heat) and supply energy efficiently and cleanly; be green: maximise opportunities for renewable energy by producing, storing and using renewable energy on-site, and be seen: monitor, verify and report on energy performance.
- 7.91 Local Plan Policy DM21 'Sustainable Design, Layout and Construction' and Policy DM22 'Decentralised Energy' sets out the requirements for residential developments in terms of applying the energy hierarchy to minimise energy use in order to meet, and if possible, exceed, minimum carbon dioxide reduction requirements.
- 7.92 Development proposals should also seek to integrate the cooling hierarchy in accordance with sustainable design, layout and construction principles. This will help to ensure that buildings are better equipped to manage their cooling needs in energy efficient ways over their lifetime. This policy applies the cooling hierarchy set out in the London Plan:
 1. Minimise internal heat generation through energy efficient design
 2. Reduce the amount of heat entering a building in summer through orientation, shading, albedo, fenestration, insulation and green roofs and wall

3. Manage the heat within the building through exposed internal thermal mass and high ceiling
 4. Passive ventilation
 5. Mechanical ventilation
 6. Active cooling systems
- 7.93 EnergyLab, and more recently Beyond Engineering, have produced an Energy and Sustainability Statements for the proposed development. The reports confirms that the energy and carbon reduction strategy under the proposed for this development are in line and in compliance with the relevant, applicable targets and requirements listed within the following planning policies of Haringey Council and the London Plan.
- 7.94 The application is further supported by an Overheating Assessment, prepared by Energylab. The Overheating Assessment confirms that the proposed development is compliant with CIBSE TM52 guidelines in reducing the risk of overheating, particularly in summer months. Additional details relating to integrated shades have also been provided as part of the application.
- 7.95 The climate change mitigation measures proposed for this development are in line and in compliance with the relevant and applicable targets and requirement listed within Haringey Council's Sustainable Design and Construction Supplementary Planning Document (SPD) and the London Plan.
- 7.96 Finally, Haringey Strategic Policies 2013 - 2026, Policy SP4: Working Towards A low carbon Haringey, requires all new non-residential development to achieve at least BREEAM Very Good with the aim to achieve BREEAM Excellent standard. Energylab (and more recently revised by Beyond Engineering) have produced a Pre-Assessment which demonstrates compliance with the Local Authority's policies in relation to BREEAM.
- 7.97 Please refer to the submitted statements enclosed for further detail.

g. Drainage and Flood Risk

- 7.98 In accordance with Policy DM25 'Sustainable Drainage Systems' of the Haringey Development Management Plan a Flood Risk Assessment and Drainage Strategy has been produced by Jomas Flood Risk Consultants.
- 7.99 The Environment Agency Flood Risk Map indicates that the proposed development site is located within Flood Zone 2. Flood Zone 2 is designated as medium probability of flooding. Land in this zone has between a 1 in 100 and 1 in 1000 annual probability of river flooding (1% - 0.1%) or between a 1 in 200 year and 1 in 1000 annual probability of sea flooding (0.5% - 0.1%) in any year. As the site is within Flood Zone 2, there is a medium risk of fluvial flooding to the site.
- 7.100 Since the development is located within Flood Zone 2 the NPPF requires that the Local Planning Authority apply the sequential test to ensure that the development is located in the most appropriate area in terms of use and flood risk. 5.2.2 A review of land for sale in the areas indicates that there are no other suitable sites available to the developer in in areas of lower flood risk within 2 km of the site.
- 7.101 Since the development is located within Flood Zone 2 the NPPF requires that the Local Planning Authority apply the sequential test to ensure that the development is located in the most appropriate area in terms of use and flood risk. A review of land for sale in the areas indicates that

there are no other suitable sites available to the developer in areas of lower flood risk within 2 km of the site. It is also noted that the Site already has the benefit of an extant planning permission for an office development.

- 7.102 Appropriate uses for land within Flood Zone 2 include essential infrastructure and the water compatible, less vulnerable, and more vulnerable uses. In Table 2 of the NPPF, office use is classified as less vulnerable while buildings used for dwelling houses are classified as more vulnerable. 5.3.2 As all ground floor level will be uninhabited and only for office use, this development is appropriate in this location and an Exception Test is not required.
- 7.103 It is proposed to discharge surface water via a new connection to the TW sewer in the street. Discharge will be restricted to 5l/s which is significantly less than the existing discharge rate. Total storage volume of 50 cubic metres is proposed for the system within the green/blue roof area. This caters for the 100 year +40% storm event.
- 7.104 Maintenance/management of all onsite drainage infrastructure has been considered within a separate maintenance plan appended to this report. This will be updated through the development process. The proposed drainage strategy is entirely based on-site and therefore the only off-site works will be the surface water and foul outlet to the Thames Water sewer.
- 7.105 Overall, the proposed development has an acceptable flood risk within the terms and requirements of the NPPF. The proposals provide a high level of water treatment, runoff reduction and flooding protection for the proposed development and are in accordance with all requirements of the Lead Local Flood Authority (LLFA).
- 7.106 With regard to foul drainage, it is proposed to discharge the foul drainage from the site into the existing TW foul sewer in the street.

h. Air Quality

- 7.107 The Haringey Development Management PDP Policy DM23 'Environmental Protection' states that development proposals should be designed to a) improve or mitigate the impact on air quality in the Borough and b) Improve or mitigate the impact on air quality for the occupiers of the building or users of the development.
- 7.108 An Air Quality Assessment (AQA) has been completed by GEM Air Quality Consultants which assessed key issues associated with the construction and operation phases of the proposed development.
- 7.109 A qualitative assessment of dust levels associated with the proposed development has been carried out. The impact of dust soiling and PM10 can be reduced to negligible through appropriate mitigation measures, which are listed in Table 21 of the AQA and are applicable to a low-risk site. Implementation of these Best Practice Measures will help reduce the impact of the construction activities. With these mitigation measures enforced, the likelihood of nuisance dust episodes occurring at those receptors adjacent to the development are considered low.
- 7.110 Notwithstanding this, the developer will consider the potential impact of air quality and dust on occupational exposure standards (in order to minimise worker exposure) and breaches of air quality objectives that may occur outside the site boundary. Monitoring is not recommended at this stage; however, continuous visual assessment of the Site is to be undertaken and a complaints log maintained in order determine the origin of a particular dust nuisance. Keeping an accurate

and up to date complaints log will isolate particular site activities to a nuisance dust episode and help prevent it from reoccurring in the future.

- 7.111 The predicted concentrations of NO₂, PM₁₀ and PM_{2.5} in all modelled years are below the relevant objectives applicable to the type of use. Predicted concentrations at all the modelled receptors fall within APEC Category A, which states that there are “no air quality grounds for refusal, however, mitigation of any emissions should be considered”. Overall, air quality is a low priority consideration at the modelled locations in each of the modelled years.
- 7.112 The proposed development is considered air quality neutral in relation to the transport and building emissions. As such, no mitigation is considered necessary.
- 7.113 Based on the results and discussion above there is no need to consider building mitigation.
- 7.114 Based on the outcome of this assessment the current proposals are considered acceptable in terms of the potential air quality impacts across the development. It can be concluded that the proposed development is not considered to conflict with national, regional, and local planning guidance.

i. Fire

- 7.115 In accordance with the London Plan policy D12, a Fire Statement has been produced by Mark Smith Architects, and accompanies this application.
- 7.116 The submitted statement demonstrates that a fire appliance can be located on Broad Lane immediately in front of the subject site, in the event of a fire. Protected stairs within the building have a dry fire main and is within 18m of the kerb for access from a pump appliance.
- 7.117 The building has been designed to incorporate appropriate compartmentation and means of escape, as outlined within the fire statement. The building has between four and nine storeys and is below 30m in height. For floor 0 to 5 are served with two protected stairs. Floors 6 to 8 are served with a one protected stair. there are two directions of escape, the maximum travel distance to the storey exit is 45m, and where there is one direction of escape, the maximum travel distance to a storey exit is 18m.
- 7.118 A fire evacuation assembly point can be located opposite the subject Site, outside Tamil House.
- 7.119 The proposed building will be fitted with fire detection and alarm systems (no less than Category M as per Annex A of BS5839-1).
- 7.120 An approved inspector and/or local authority building control will be engaged to ensure building control compliance. The works are to comply with the Building Regulation Approved Documents, specifically Part B Fire Safety Volume 1 Dwellings.

j. Planning Benefits

- 7.121 The proposed development secures a substantial package of planning benefits which we summarise below:

- 7.122 The proposals comprise 4,938sqm (GIA) of new, flexible Class E floorspace, representing a significant increase in employment floorspace. Within a Local Industrial Locations (LIL), local employment opportunities should be maximised to deliver investment and job creation.
- 7.123 The proposals have potential to accommodate circa 411 'employees'.
- 7.124 The development will enhance an existing poor-quality Site, which makes no contribution to the local context. The vacant nature of the Site is considered to detract from the local character and appearance. The redevelopment would regenerate the Site and would positively influence the immediately surrounding area, and emerging wider context.
- 7.125 Once operational, the development will provide with a high-quality place to work, with good levels of amenity and energy efficiency. Secure cycle parking will also be provided, along with improvements to the public realm and accessibility through the Site. The proposed development will lead to a positive health and wellbeing effect.
- 7.126 The development will secure significant funds through the Council's Community Infrastructure Levy, contributing towards new developments, such as schools, health services, leisure, open spaces, and transport improvements.
- 7.127 Finally, the development will also secure works and funds pertaining employment and skills training; construction phase skills and training; end user phase skills and training, and apprenticeships.

8.0 SUMMARY AND CONCLUSIONS

- 8.1 This Planning Statement has been prepared on behalf of Broad Lane Properties Limited and accompanies a full planning application for works at the Former Car Wash, Land East Side of Broad Lane, London N15.
- 8.2 The Site currently benefits from an extant planning permission for the '*Demolition of the existing car wash, construction of a new office block including, covered bin and cycle store and parking*' (Council Ref: HGY/2016/2232). The development permitted 1,944sqm of employment generating space. Whilst works had commenced, the building works have not progressed.
- 8.3 The applicants seek to improve upon the extant consent, to create a new building ranging from 4 to 9 storeys. The office building will comprise 4,938sqm of much needed, multi-functional office floorspace.
- 8.4 The Site is designated within a Locally Significant Industrial Locations (LSIL), whose role it is to provide important areas of light-manufacturing and to provide local employment opportunities. The creation of 4,938sqm flexible floorspace provides significant opportunities to promote the creation of a sustainable, diverse, and balanced economy and a significant increase in employment numbers. It is estimated that there is the potential for approx. 411 new employees based on floorspace.
- 8.5 With regard to design, the development will enhance an existing poor-quality Site. The scale and massing would fit with the emerging context and includes stepping heights that create a varied and interested roofscape. The design is very high quality, with use of high-quality contextual materials.
- 8.6 The application is supported by a Healthy Street Transport Assessment, a Delivery and Servicing Management Plan; Framework Travel Plan; and Outline Construction Logistics Plan; providing a comprehensive assessment of the transport impacts of the development. The development is delivered as car free given the Sites excellent PTAL of 6, with the exception of one blue badge bay on site. Appropriate levels of cycle storage are also accommodated on Site. A Travel Plan sets out measures that will be put in place to reduce the vehicular movements (i.e., promoting public transport). A Travel Plan Co-ordinator will be nominated to promote and implement the various initiatives.
- 8.7 Landscaping and biodiversity opportunities are maximised as part of the development. Significant areas of biodiverse green roofs are incorporated. The Site achieves an Urban Green Factor score of 0.49, exceeding the London Plan targets for commercial development of 0.3.
- 8.8 The development's impact on neighbouring amenity has been considered through good design. The form and massing steps away from sensitive receptors. A quantitative Daylight and Sunlight study is submitted which concludes that overall, a very high level of compliance with the BRE recommendations is shown.
- 8.9 Full energy modelling has been undertaken of the development which confirms that it achieves the required reduction in CO2 emissions, and the minimum 35% reduction required by the London Plan 2021.
- 8.10 The development is supported by a Flood Risk and Drainage Strategy which confirms that the development will meet local and national planning policy to restrict surface water runoff. Attenuation will be provided through the inclusion of a blue/green roofs.

- 8.11 An Air Quality Impact Assessment is submitted with the application which concludes that the development is unlikely to be adversely affected by or have a significant impact on local air quality.
- 8.12 The application is further supported by a Fire Statement in accordance with the London Plan Policy D12. The Fire Statement details how the proposed development will mitigate fire risk by addressing the requirements of the policy.
- 8.13 In conclusion, the proposed development contributes to the achievement of sustainable development. The development seeks to invest, expand, and adapt business uses, to which significant weight should be placed, considering both local business needs and wider opportunities for development.
- 8.14 The development results in significant employment growth and a variety of other significant planning benefits including;
- 4,938sqm (GIA) of new, flexible Class E floorspace, representing a significant increase in employment floorspace. Within a Local Industrial Locations (LIL), local employment opportunities should be maximised to deliver investment and job creation.
 - The proposals have potential to accommodate circa 411 'employees'.
 - The development will enhance an existing poor-quality Site, which makes no contribution to the local context. The vacant nature of the Site is considered to detract from the local character and appearance. The redevelopment would regenerate the Site and would positively influence the immediately surrounding area, and emerging wider context.
 - Once operational, the development will provide with a high-quality place to work, with good levels of amenity and energy efficiency. Secure cycle parking will also be provided, along with improvements to the public realm and accessibility through the Site. The proposed development will lead to a positive health and wellbeing effect.
 - The development will secure significant funds through the Council's Community Infrastructure Levy, contributing towards new developments, such as schools, health services, leisure, open spaces, and transport improvements.
 - Finally, the development will also secure works and funds pertaining employment and skills training; construction phase skills and training; end user phase skills and training, and apprenticeships.