

707-725 Lordship Lane, London N22 5JY

Planning Statement

February 2024

DP9 Ltd

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100 Pall Mall
London
SW1Y 5NQ



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1. Introduction

- 1.1 This planning statement has been prepared by DP9 Limited (DP9), on behalf of Atri7 2 Limited & Fusion Global Management LLP ('the Applicant'), to accompany a full planning application for the redevelopment of the site known as 707-725 Lordship Lane, London, N22 5JY ('the Site'), located in the London Borough of Haringey ('LBH').
- 1.2 The proposed development comprises the comprehensive redevelopment of the Site, including demolition of the existing bingo hall and the construction of affordable housing, purpose-built student accommodation (PBSA), flexible ground floor commercial floorspace, new areas of public realm, and other associated works.
- 1.3 The Site is located within the Wood Green Opportunity Area, which is identified in the London Plan (2021) as an area where significant new housing and employment opportunities are to be brought forward. The Site is subject to a site-specific allocation for mixed-use redevelopment within the adopted LBH Local Plan (Site Allocation SA9).

Description of Development

- 1.4 Planning permission is sought for the following:

"Demolition of the existing building and redevelopment to provide affordable homes, purpose-built student accommodation, and flexible ground floor commercial (Class E) floorspace within buildings ranging between 3 – 9 storeys, public realm and landscaping works, cycle parking, and associated works." ('the Proposed Development')
- 1.5 A detailed overview of the proposed development is provided within the Design and Access Statement, prepared by Corstorphine & Wright which accompanies the planning application. A summary description of the Proposed Development is contained in Chapter 5 of this Statement.

The Applicant

- 1.6 Fusion Global Management LLP ('Fusion'), is an experienced developer and operator of purpose built student accommodation throughout the UK. Fusion distinguishes themselves from other brands through their emphasis on quality, curating spaces through industry-leading design and providing offerings with healthy, social and vibrant communities. Their facilities are built around students' needs, with residents of their existing developments having access to high quality amenities including interior designed common areas, cinemas and study spaces, free bike rentals, and high speed Wi-Fi.
- 1.7 Fusion have established a strong reputation as an operator/developer, having built-out and delivered on every scheme they have been granted planning permission for. Their schemes have been developed in close collaboration with the relevant local authorities and local



residents and interest groups. As well as providing high quality student accommodation and services they offer improved public realm spaces and art installations.

- 1.8 Fusion has carefully selected Wood Green as a location to invest on the basis of its vibrant town centre, excellent public transport accessibility, and strategic location close to London's major universities, cultural, and educational destinations. Fusion is committed to the delivery of the Proposed Development and the significant regeneration benefits it will bring to Wood Green.
- 1.9 Tri7 is a real estate investment and asset management firm established in 2018 to transform investment opportunities in the UK. They are a specialist team that work corroboratively alongside partners to deliver schemes that realise significant improvements to the places and communities in which they develop.

Structure of the Planning Statement

- 1.10 The purpose of the Planning Statement is to assess the planning considerations associated with the Proposed Development in the context of national, regional and local planning policy and guidance. The Planning Statement comprises the following:
- Chapter 2 describes the Site context and surroundings;
 - Chapter 3 describes the planning history of the Site;
 - Chapter 4 summarises the consultation process undertaken as part of the Proposed Development;
 - Chapter 5 provides a description of the Proposed Development;
 - Chapter 6 sets out the planning policy framework on which the Proposed Development is assessed;
 - Chapter 7 assesses the Proposed Development against planning policy and guidance;
 - Chapter 8 describes the planning obligations and section 106;
 - Chapter 9 provides a summary of the various public benefits delivered by the Proposed Development; and
 - Chapter 10 provides a summary and conclusions.

Planning Application Documents

- 1.11 This Planning Statement should be read and considered in conjunction with the followings plans and other supporting documents submitted as part of this application:



- Relevant Forms and Notices
- Application Drawings, prepared by Corstorphine & Wright
- Design and Access Statement, prepared by Corstorphine & Wright
- Transport Assessment, prepared by Calibro
- Draft Travel Plan, prepared by Calibro
- Delivery and Servicing Plan, prepared by Calibro
- Flood Risk Assessment, prepared by Farrow Walsh
- Heritage Townscape and Visual Impact Assessment, prepared by the Townscape Consultancy
- Affordable Housing Statement, prepared by DS2
- Sustainability Statement, prepared by Ensphere
- Sustainability Credentials Summary, prepared by Ensphere
- Energy Statement, prepared by Amber
- Arboricultural Impact Assessment, prepared by Arboricultural Solutions
- Preliminary Ecological Appraisal (incl. Biodiversity Net Gain Assessment and Urban Greening Factor Calculation), prepared by Wardell Armstrong
- Noise Impact Assessment, prepared by Apex Acoustics
- Air Quality Assessment, prepared by Planning & Environmental Consultants
- Daylight and Sunlight Assessment, prepared by GIA
- Lighting Assessment, prepared by Amber
- Statement of Community Involvement, prepared by Kanda
- Landscape Design and Access Statement, prepared by Park Hood
- Landscape Management and Maintenance Plan, prepared by Park Hood
- Landscape Drawings, prepared by Park Hood
- Student Needs Assessment, prepared by Cushman & Wakefield
- Socio-Economic Assessment, prepared by Cushman & Wakefield
- Market Demand Report, prepared by Strettons
- Whole Life Carbon Assessment, prepared by Ensphere
- Circular Economy Statement, prepared by Ensphere
- Fire Statement, prepared by Helios
- Equalities Impact Assessment, prepared by Greengage
- Crime Impact Statement, prepared by Consultive Solutions
- Residence Management Plan, prepared by Fusion



2. Site Context

- 2.1 This chapter describes the Site and the surrounding context.
- 2.2 The boundary of the Site is defined by the red line boundary identified on the Site Location Plan which accompanies this planning application, an extract of which is provided below:



Figure 1: Site Location Plan

- 2.3 The Site measures 0.86ha and is located on the southern side of Lordship Lane, approximately 150m east of Wood Green Station, within Wood Green Town Centre. The Site comprises an existing single-storey bingo hall, surrounded by a large expanse of concrete providing surface level car parking associated with the existing bingo hall use. The Moselle Brook runs along the southern boundary of the Site. This was culverted in the 1950's and is identified in blue in Figure 1 above.
- 2.4 The Site is located at the eastern extent of the Wood Green Town Centre, in an area which is predominantly mixed-use in character. Wood Green is identified as a Metropolitan Town Centre within the London Plan (2021) and functions as a destination for shopping and retail services, community and administrative functions for the surrounding areas.



- 2.5 Adjoining the Site to the east is the Vincent Estate, a housing estate comprising blocks of the three-storey flats. To the southwest is Wellesley Road, immediately south of which are a number of three storey terraced houses. Immediately to the south of the Site's southern boundary are the rear gardens associated with a number of residential properties which front onto Moselle Avenue located further to the south. The rear gardens are separated from the existing surface level car park within the Site by a brick wall which delineates the southern and eastern boundary of the Site.
- 2.6 Immediately to the west of the Site is Omnibus House, a seven storey residential building with a commercial gym (Class E) on the ground floor. The Vue Cinema complex, which also includes Nandos, Sainsbury's Local, and a number of other retail and food & beverage units, is located to the west of Omnibus House.
- 2.7 The A109 Lordship Lane forms the northern boundary of the Site beyond which are predominantly 2-3 storey houses and flats.
- 2.8 The Site has a PTAL level of 6a (scale 1 – 6b), indicating a very high level of public transport accessibility.
- 2.9 Pedestrian and vehicular access to the site is currently from both Lordship Lane in the north, and Wellesley Road in the south.
- 2.10 The Site does not contain any listed buildings, nor is it located within a Conservation Area, however, it is located immediately north of the Noel Park Conservation Area.
- 2.11 The Site sits within Flood Zone 1 and therefore has a low probability of flooding from rivers and the sea.



3. Planning History

- 3.1 This chapter highlights the key planning history records relevant to the Site. This is not intended to be exhaustive, but identifies the planning history which is considered to be most relevant to this planning application.
- 3.2 In February 1985, two planning permissions were granted for the construction of a retail superstore, separate office building, and associated car parking at the Site (LPA Ref. OLD/1985/0713 and OLD/1985/0714).
- 3.3 On 6 February 1996, planning permission was granted (LPA Ref. HGY/1995/1177) for the change of use of the existing retail warehouse (Use Class A1) to a bingo hall (Use Class D2). The use of the Site has continued as a bingo hall since this time.
- 3.4 In March 2007, planning permission was granted (Ref. HGY/2007/0206) for the erection of single storey smoking shelter to rear of the existing bingo hall .

EIA Screening

- 3.5 In November 2023, an application was made to LBH for an Environmental Impact Assessment (EIA) Screening Opinion in relation to the redevelopment of the Site (LPA Ref. HGY/2023/3273) as is currently proposed. On 13 February 2024, LBH issued a Screening Opinion confirming that the Proposed Development does not constitute EIA development and that an Environmental Statement is not required.



4. Pre-Application Discussions and Consultation

- 4.1 This chapter describes the pre-application engagement and consultation that has taken place prior to the submission of the planning application. Full details are provided in the Statement of Community Involvement, prepared by Kanda, which accompanies the planning application.
- 4.2 Pre-application discussions with LBH and the Applicant began in November 2022, with a series of pre-application meetings having been held in the lead up to the submission of the planning application. The meetings were topic based and covered a number of matters including:
- Form of planning application;
 - Land uses and quantum;
 - Height and massing;
 - Heritage and townscape;
 - Landscaping and public realm;
 - Transport and highways;
 - Sustainability and energy; and
 - Daylight and sunlight.
- 4.3 A pre-application meeting was held with the Greater London Authority ('GLA') on the 22 September 2023. The meeting addressed key strategic issues including land use, height and massing, urban design and transport.
- 4.4 A meeting was held with the Haringey Development Management Forum on 13 September 2023 and a presentation of the emerging proposals was presented to the Planning Sub-Committee on 16 October 2023. Various matters were discussed at these meetings, including the existing and proposed land uses and evolving design of the proposals.
- 4.5 On 25 September 2023, a detailed briefing was held with Cllr Peray Ahmet, Leader of the Council and Ward Councillor for Noel Park, Cllr Ruth Gordon and Cllr Sarah Williams.
- 4.6 The proposals have been the subject of two Quality Review Panel meetings, held in September and November 2023. Discussion at these meetings focused on design matters including height and massing, materiality, and the quality of the proposed residential and student accommodation.
- 4.7 The Proposed Development has evolved throughout these discussions, to reflect and address feedback and comments received. The scheme initially presented to LBH comprised student accommodation and build-to-rent housing. Officers suggested that the scheme could benefit from providing a greater diversity of housing and delivering a greater public benefit for the local area. Accordingly, the proposals were amended to provide affordable housing, including a mix of social rent and shared-ownership homes, ensuring a greater contribution to the creation of a mixed and balanced community.



- 4.8 The proposed residential unit mix has been the result of ongoing discussions with LBH, with the inclusion of 7no. 5-bed family townhouses being proposed to address an acute need for large family affordable homes that has been identified by LBH's Housing team.
- 4.9 Further information regarding the evolution of the scheme through the pre-application process is provided within the Design and Access Statement, prepared by Corstorphine & Wright as well as explained further within this Planning Statement where it is relevant to the assessment of the Proposed Development against the development plan and other material considerations.

Public Consultation

- 4.10 The following provides a summary of the activities undertaken as part of the consultation process :
- Letters sent to key local stakeholders. This included political stakeholders and the following community groups:
 - Noel Park Residents Association
 - Page High Tenants Association
 - The Community Hub, Wood Green
 - Wood Green BID
 - Flyers sent to c.1,502 residential and businesses addresses surrounding the Site to promote the dedicated consultation website and public consultation events being scheduled.
 - The launch of a dedicated project consultation website, www.lordshipplaneconsultation.co.uk. The website introduced the proposals through an information pack, provided a feedback form and shared contact details for the project team. The website was updated throughout the consultation process, with 151 unique visitors to the website taking place since its launch.
 - Two public consultation events were held in May 2023 to introduce local residents and community members to the project team and proposals.
 - A further public consultation event to provide an update on the Proposed Development following further design development was held in late November 2023.
- 4.11 The feedback received throughout the consultation process has been generally positive with several respondents noting the potential to revitalise the Site. Respondents have been particularly positive towards the proposed new open spaces, improved public realm and town centre spaces, which they feel needed to be more present in the current area.



- 4.12 Further information regarding the consultation undertaken with the local community prior to the submission of the planning application is provided within the Statement of Community Involvement, prepared by Kanda.
- 4.13 The Applicant remains committed to engaging with residents, businesses and other key local stakeholders through the planning application process and beyond.



5. Application Proposals

Description of Development

- 5.1 This chapter describes the Proposed Development to which this planning application relates and for which planning permission is sought.
- 5.2 Planning permission is being sought for:

“Demolition of the existing building and redevelopment to provide affordable homes, purpose-built student accommodation, and flexible ground floor commercial (Class E) floorspace within buildings ranging between 3 – 9 storeys, public realm and landscaping works, cycle parking, and associated works.”

Land Uses

- 5.3 The proposed land uses are as follows:
- 77 affordable homes (Use Class C3), proposed as a mix of social rented and shared-ownership homes;
 - Student accommodation (Sui Generis) comprising 623 student rooms (including 62 affordable student bedrooms); and
 - 796 sqm (GIA) of flexible Commercial, Business and Service floorspace (Use Class E)

Design

- 5.4 The proposals comprise a purpose-built student accommodation (Building A) which is configured around a central courtyard in the northern part of the Site, fronting Lordship Lane. Flatted affordable houses (Buildings B & C) and affordable townhouses (Building D) are proposed in the south of the Site.
- 5.5 The design of the Proposed Development has been designed to reflect the local context, including through the use of materials and detailing which respect the local context and streetscape character.
- 5.6 A varied material pallet, which comprises predominantly brick of varying tones is proposed, with rhythm, ornamentation and scale varying across the site, reflective of changing context.

Built Form

- 5.7 The buildings will range in height from 3 to 9 storeys. The tallest element of the Proposed Development is Building A, being the PBSA building which fronts Lordship Lane. The height of



the buildings then step down towards the south of the Site to respect the adjacent Noel Park Conservation Area.

- 5.8 Buildings B & C, located to the south of the PBSA building (Building A) are proposed as flatted 6-storey blocks of affordable homes. Building D comprises two rows of terraced three-storey housing located in the southern extent of the Site, being the closest located buildings to the existing housing fronting Moselle Avenue.

Public Realm

- 5.9 A comprehensive open space strategy has been developed by Park Hood Landscape Architects that will create a public realm that is a natural open space. The design incorporates a nature play area, wildlife shrub buffers, raised planters and a rain garden alongside outdoor working and dining facilities. Further details are provided within the Landscape Design and Access Statement which accompanies this planning application.
- 5.10 The Proposed Development will provide 2,030sqm of public open space, accessible to future residents of the Proposed Development, and also to the wider community. The space has been designed to be safe and welcoming and to provide a pedestrian friendly and biodiverse public realm, that stitches together the buildings and creates a local destination. An additional 135sqm of public realm improvements are proposed along Lordship Lane.
- 5.11 A coherent network of pedestrian priority routes are proposed through the Site, providing it with a high level of permeability for residents and public alike. The planting scheme uses a mix of native and ornamental tree and shrub species to create a seasonal landscape that is functional, whilst being sympathetic to its surrounding environment.
- 5.12 Overall, the design creates a high-quality public realm, with areas for passive and active recreation together with social / community interaction.

Layout

- 5.13 The flexible commercial floorspace is to be located at ground floor level in Building A. This will enable a range of town centre uses to come forwards fronting directly onto Lordship Lane. Indicatively, the Proposed Development has been designed to accommodate a community café, food hall and workspace.
- 5.14 The main entrance for the student accommodation use will be via the proposed public realm, which will ensure that the space remains active throughout the day and evening. Active ground floor uses, including residential uses and duplex student rooms, have also been designed to address the open space to provide a high level of passive surveillance.
- 5.15 The student accommodation is split into two main types, studio rooms for single occupants and clusters of bedrooms with shared living/kitchen dining room.



- 5.16 The typical floorplan for the student building is arranged around a central courtyard. Three cores provide vertical circulation by way of lift and stair access in the north-east, south-west, and south-east of the block.
- 5.17 At ground floor level a series of amenity spaces are provided including waiting areas, study space, post rooms and a management office which will be managed 24 hours a day.

Children's Play Space

- 5.18 The urban nature of the Site means that the landscape needs to cater and respond to the needs of multiple user groups. The landscape for the development has therefore been designed to incorporate 'playful' landscape, as part of an overall provision of approximately 850sqm of children's play space.
- 5.19 The existing site levels and the architectural layout have been exploited to create play opportunities throughout the Site. Areas of dedicated play space are proposed alongside incidental play elements which include a biodiversity trail with routes for children through the planted areas and insect hotels, and seating and planters which have been designed to provide opportunities for play.
- 5.20 The courtyards and the terraces follow the playful language of the ground floor. Playable landscape is also proposed on the communal terraces of Buildings B and C, including a flexible lawn area which can be used for a multitude of uses.

Access

- 5.21 The Proposed Development will afford separated pedestrian access to each of the different land uses within the Proposed Development. Each access point will connect to the wider, surrounding pedestrian network (Lordship Lane to the north and Wellesley Road to the south).
- 5.22 Access to the student accommodation will be from the proposed public realm. The principle access to the building will be via the reception and communal amenity space. An adjacent access is also proposed, which will provide direct access to the student rooms above, via lifts.
- 5.23 Two vehicle access points will be provided for servicing, emergency vehicles and student drop off/collections, operating in a one-way direction. Access will be along Lordship Land (A109), with egress via Wellesley Road.

Servicing and Car Parking

- 5.24 Reflective of the highly accessible and sustainable location, the Proposed Development will be car-free, with no parking provided other than requisite Blue badge parking.



- 5.25 A total of 6 Blue Badge parking spaces will be provided. These comprise 4 no. residential spaces, 1 no. PBSA space and 1 no. space for the non-residential uses. There is capacity for the inclusion of a further four residential Blue Badge parking spaces within Wellesley Road, should the need arise in the future.
- 5.26 The Proposed Development incorporates an 18-metre long loading bay on-site for servicing and deliveries to the PBSA building. This would also be utilised for student drop-offs and collection at the start and end of each academic year.
- 5.27 A student drop-off strategy will be implemented to safely and efficiently process the arrival and departure of students at the start and end of academic periods, details of which are set out in the Delivery and Servicing Plan, prepared by Calibro, and submitted with this planning application.

Cycle Storage

- 5.28 Building A will provide a total of 466 cycle parking spaces within a communal, secure parking area. Building B will provide 48 cycle parking spaces and Buildings C & D will provide 62 cycle parking spaces.
- 5.29 20 short stay cycle spaces will be provided throughout the Site. These spaces will be located adjacent the entrances of each of the residential and PBSA buildings, with a further 8 no. short stay cycle spaces provided in the north of the Site for the commercial element.



6. Planning Policy Framework and Overview

- 6.1 This section identifies the key national, regional and local planning policy and guidance relevant to the determination of the planning application for the Proposed Development, and against which the proposals have had regard to during design development. An analysis of the key policies and tests is included in the relevant sections.
- 6.2 Section 70 of the Town and Country Planning Act 1990 and 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.
- 6.3 The Development Plan for the Site comprises the following:
- The London Plan (2021);
 - The London Borough of Haringey Strategic Policies DPD (2013 with 2017 alterations) (LBH Local Plan);
 - The London Borough of Haringey Development Management DPD (2017); and
 - Site Allocations DPD (2017).

National Planning Policy and Guidance

- 6.4 At the national level, the Government published its updated National Planning Policy Framework (NPPF) in December 2023. The NPPF provides an overarching framework for the production of local planning policy documents and at the heart of this document is a presumption in favour of sustainable development (paragraph 11). This is a material consideration in planning decision making.
- 6.5 In accordance with paragraph 11 of the NPPF, 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:*
 - *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*
 - *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.”*
- 6.6 In addition, paragraph 9 of the NPPF sets out that planning policies and decisions should take into account local circumstances, so that they respond to the different opportunities for achieving sustainable development in different areas.



- 6.7 Paragraph 123 of the NPPF states that planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.
- 6.8 Paragraph 128 of the NPPF states that planning policies and decisions should support development that makes efficient use of the land, and take the following into account:
- a) the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;*
 - b) local market conditions and viability;*
 - c) the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;*
 - d) the desirability of maintaining an area’s prevailing character and setting (including residential gardens), or of promoting regeneration and change; and*
 - e) the importance of securing well-designed and beautiful, attractive and healthy places.*
- 6.9 The Government’s National Planning Policy Guidance (NPPG) supports the NPPF and provides high level guidance with regard to specific planning issues and processes. These are material considerations in decision making.

Regional Policy

- 6.10 The Regional Planning Policy relevant to the Site is the London Plan (2021), being the spatial development strategy for Greater London. It sets out a framework for how London will develop over the next 20-25 years.

Local Planning Policy

- 6.11 The Haringey Local Plan, as relevant to this Site, comprises the Strategic Policies Development Plan Document (DPD), Development Management DPD, and Site Allocations DPD.
- 6.12 Haringey’s Local Plan Strategic Policies sets out the long-term vision of how Haringey, and the places within it, should develop by 2026 and sets out LBH’s spatial strategy for achieving that vision.
- 6.13 The Development Management DPD gives effect to LBH’s spatial strategy and the key objectives of the Strategic Policies Local Plan, by supporting proposals that contribute to the delivery of sustainable development.
- 6.14 The Site Allocations DPD gives effect to the spatial strategy by allocating sufficient sites to accommodate development needs.



Supplementary Planning Guidance

6.15 The Proposed Development has also had regard to various GLA and LBH strategies and guidance documents, which although do not form part of the Development Plan, have been taken into consideration in developing the design of the Proposed Development and in our assessment of it, where relevant:

- Adopted GLA Supplementary Planning Guidance (SPG) or London Plan Guidance (LPG):
 - Accessible London SPG (October 2014)
 - Characterisation and Growth Strategy LPG (June 2023)
 - Optimising Site Capacity: A Design-Led Approach LPG (June 2023)
 - Housing Design Standards LPG (June 2023)
 - Affordable Housing and Viability SPG (2017)
 - Housing SPG (2016)
 - Play and Informal Recreation SPG (September 2012)
 - Urban Greening Factor LPG (February 2023)
 - Air quality Positive LPG (February 2023)
 - Air quality Neutral LPG (February 2023)
 - 'Be Seen' Energy Monitoring Guidance (September 2021)
 - Circular Economy Statements LPG (March 2022)
 - Whole-life Carbon LPG (March 2022)
 - Public London Charter (September 2021)
 - Energy Planning Guidance (June 2022)
- Local Supplementary Planning Documents and Guidance
 - Planning Obligations SPD (2018)
 - Sustainable Development and Construction SPD (2013)
 - Waste Storage Guidance Note (2013)

6.16 In addition to the above, the following emerging GLA planning guidance documents are considered to be of relevance to the Proposed Development:

- Draft Purpose-built Student Accommodation London Plan Guidance (2023)
- Draft Affordable Housing LPG (2023)
- Draft Development Viability LPG (2023)
- Draft Fire Safety LPG (February 2022)

Emerging Policy

6.17 LBH has commenced their preparation of a new Local Plan, which initially underwent formal consultation between November 2020 and March 2021. The First Steps Engagement consultation looked to set out the key issues to be addressed by the New Local Plan. A



consultation report is expected to be published alongside a Draft Local Plan for further consultation in Summer 2024.

- 6.18 The Draft Wood Green Area Action Plan (AAP) underwent Regulation 18 public consultation in 2018, following a previous consultation in Spring 2017 and Spring 2016. The third consultation focused on the Preferred Option Area Action Plan. The Draft AAP identifies a development capacity for Wood Green of approximately 6,500 homes and 150,000sqm of employment/town centre floorspace, being a significantly greater quantum of development than is identified in either the adopted Local Plan, or the London Plan.
- 6.19 Similar to the existing allocation covering the Site in the adopted Site Allocations DPD, the Site is allocated within the draft Wood Green AAP (Site Allocation ref. WG SA 6) for mixed-use redevelopment. The draft Wood Green AAP allocates the Site for development of 209 residential units, 4,176sqm of employment floorspace, and 2,088sqm of town centre floorspace. The emerging AAP identifies the Site as having *“significant intensification potential”*.
- 6.20 Whilst regard has been had to these emerging Development Plan documents, due to their infancy in the plan making process, it is expected that they would only be afforded very limited weight in planning decision making process.

Site Allocation

- 6.21 The Site is allocated within the Site Allocations DPD (Ref: SA9) with an identified indicative development capacity of 191 residential units and 1,484sqm of town centre uses. The site allocation sets out a number of design principles that any future redevelopment of the Site should look to adopt. This includes (inter alia) identifying that Wellesley Road should be extended through the southern part of the Site, with the building line along the southern edge of Wellesley Road to also be continued.
- 6.22 In regards to building heights, the site allocation identifies that development should preserve the setting of the adjoining Noel Park Conservation Area and its significance. Heights in the south of the site should be respectful of the existing properties on Moselle Avenue.
- 6.23 The allocation identifies that an active frontage should be provided to Lordship Lane and confirms there is no requirement to retain the existing building.



7. Planning Policy Assessment

- 7.1 This section assesses the Proposed Development against the relevant national, regional and local planning policies and key material considerations. It is not intended to be exhaustive, instead addressing the key planning policies and guidance relevant to enabling the LBH to determine whether the planning application is in accordance with the Development Plan, and what material considerations are relevant to the decision.
- 7.2 Where specialist consultants have assessed the Proposed Development in relation to specific topics, their assessment is summarised here and reference is provided to the relevant supporting documents.
- 7.3 It is considered that overall the Proposed Development fully accords with current and emerging planning policy and guidance. In accordance with National policy, the London Plan, and LBH Local Plan.
- 7.4 The allocation of the Site within the adopted LBH Local Plan has long signalled the Site as providing the opportunity for a comprehensive mixed-use development to be delivered which could provide substantial benefits to Wood Green Town Centre and beyond.
- 7.5 The Proposed Development seeks the delivery of a high-quality, high density mixed-use development within the Wood Green Town Centre in accordance with the site allocation.

The Principle of Development

- 7.6 This section assesses the appropriateness of the Site for redevelopment to deliver the Proposed Development in principle.
- 7.7 The principle of the redevelopment of the Site to deliver a high-density mix of uses is supported by planning policy at all levels.

Policy Context

- 7.8 The NPPF sets out three overarching economic, environmental and social objectives to achieve sustainable development and how these are expected to be applied.
- 7.9 Paragraph 11 outlines that for decision-taking, local authorities should apply a presumption in favour of sustainable development by:

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

d) 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 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.”*

- 7.10 Chapter 5 of the NPPF supports the delivery of a sufficient supply of homes. Paragraph 60 recognises the importance that a, *“...sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay”* to meet the Government’s objective of significantly boosting housing supply. The London Plan identifies that student accommodation contributes to meeting London’s overall housing need and the Planning Practice Guidance (PPG) also states that student housing can count towards an authority’s housing land supply through freeing up conventional housing elsewhere.
- 7.11 Chapter 11 of the NPPF promotes the effective use of land in meeting the need for homes and other uses. Paragraph 120 gives *“substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs”*. Paragraph 129 states that where there is a shortage of land for meeting identified housing needs, it is especially important that planning decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site.
- 7.12 The national strategic objectives are supported by the Planning Practice Guidance, which sets out further detail on how the Government’s objectives can be achieved through plan making and decision-taking.
- 7.13 Policy GG2 of the London Plan encourages making the best use of land, including enabling the development of brownfield land and proactively exploring the potential to intensify the use of land for homes and workspaces by higher density development on well-connected sites.
- 7.14 To ensure that Boroughs achieve their housing targets, Policy H1 requires development plans to allocate sites suitable for residential and mixed-use development. Part 2 encourages plans and decisions to optimise the potential for housing on all suitable and available brownfield sites, especially on well-connected sites and identified industrial sites, amongst other criteria. The supporting text confirms that student accommodation counts towards meeting housing targets.
- 7.15 The London Plan has designated Wood Green as an Opportunity Area, with capacity for indicatively 4,500 homes and 2,500 jobs. Opportunity Areas are defined as significant locations with development capacity to accommodate new housing, commercial



development and infrastructure (of all types), linked to existing or potential improvements in public transport connectivity and capacity.

- 7.16 Wood Green is also identified as a Growth Area in the adopted Local Plan, with the emerging Wood Green Area Action Plan (AAP) identifying a narrative to deliver new jobs and homes, improvements to the town centre offer, its environment, local connections and social infrastructure.
- 7.17 The Site is allocated under the LBH Local Plan (Ref. SA9) with an indicative development capacity of 191 residential units and 1,484sqm of town centre uses. The LBH Site Allocations SPD describes the Site as:
- *Representing an underutilised opportunity in a highly accessible town centre location;*
 - *Providing scope for comprehensive redevelopment to bring new residential development into the town centre; and*
 - *An opportunity to reduce surface car parking.*

- 7.18 The site allocation states that the Site *“represents an underutilised opportunity in a highly accessible town centre location. There is scope for comprehensive redevelopment to bring new residential development into the town centre with a town centre frontage onto Lordship Lane with a significant reduction in surface car parking.”*

Assessment

- 7.19 The occupation of the site by a single storey bingo hall and surface level car park represents an underutilisation of an important Town Centre site, situated within an Opportunity Area and identified Growth Area. The potential of the Site to contribute to the Wood Green Town Centre is not currently being optimised when considered in the context of planning policy which promotes high-density, mixed-use development on brownfields sites such as the existing Site. The existing single-storey bingo hall and surface level car park provides an excellent opportunity for the
- 7.20 The redevelopment of the Site to deliver a high quality, mixed-use development comprising affordable housing, purpose-built student accommodation, town centre floorspace, along with new public realm improvements represents a meaningful contribution towards meeting the planning policy objectives for the site, and will provide a significant regeneration benefit for Wood Green. The principle of bringing forward the Site for redevelopment of the various proposed uses is set out below.

Residential (Class C3)

- 7.21 The NPPF sets out the Government’s objective of *“significantly boosting the supply of homes”* (Paragraph 60). This is reflected in Policy H1 of the London Plan, which provides that the 10-



year housing target for Haringey is 15,920, equating to 1,592 dwellings per year. This is to be achieved by optimising the potential for housing delivery on suitable and available brownfield sites, especially those in highly accessible locations.

- 7.22 The London Plan also identifies the Wood Green/Haringey Opportunity Area with an indicative capacity to provide 4,500 new homes by 2041.
- 7.23 Local Plan Policy SP2 'Housing' states LBH will aim to provide homes to meet Haringey's housing needs and to make the full use of Haringey's capacity for housing by maximising the supply of additional housing to meet and exceed minimum targets. It identifies that LBH will aim to exceed the minimum target of 19,802 homes from 2011 – 2026 (820 units per annum from 2011 – 2014 and 1,502 units per annum thereafter).
- 7.24 The Site is allocated for the development of housing, to enable the Council to achieve its housing targets set out within the London Plan and Local Plan.

Assessment

- 7.25 The Site is located within the Wood Green Town Centre, a location which has been identified by the London Plan (through its designation as an Opportunity Area) and the adopted Local Plan (which identifies Wood Green as a Growth Area) as a location to accommodate substantial new housing to meet the needs of the Borough, and London more broadly.
- 7.26 The Site is currently underutilised and has been allocated for residential development, amongst a range of uses. The Proposed Development seeks to optimise the capacity of the Site to achieve a mixed and balanced community through a mix of social rent and shared ownership homes, alongside student accommodation and town centre uses.
- 7.27 The Proposed Development will deliver a total of 77no. affordable homes on an underutilised brownfield site, in a highly accessible and sustainable location. As further discussed in the 'Housing Delivery' section below, when considered in combination with the proposed provision of student accommodation, the Proposed Development contributes the equivalent of 326 new homes towards meeting Haringey's housing need. This represents approximately 20.5% of Haringey's housing need within a given year, and a greater contribution towards the delivery of housing than is envisaged by either the adopted or emerging site allocation.
- 7.28 Overall, the Proposed Development will provide much needed new affordable homes, alongside student housing and town centre uses, . It will therefore accord with all relevant housing policy and make a significant contribution towards meeting Haringey's housing need.

Housing Delivery

- 7.29 The London Plan identifies that student accommodation contributes to meeting London's overall housing need and is not in addition to this need. The sub-text to Policy H1 confirms



that non-self-contained accommodation for students should count towards meeting housing targets on the basis of a 2.5:1 ratio, with two and a half bedrooms/units being counted as a single home. The Planning Practice Guidance (PPG) also states that student housing can count towards an authority's housing land supply, on the basis that new student housing releases housing stock in the wider housing market by allowing existing properties to return to general residential use, and allows general market housing to remain in such use, rather than being converted to HMOs for use as student accommodation.

- 7.30 LBH's most recent Strategic Housing Market Assessment (2021) ('SHMA'), prepared in support of the emerging Local Plan, identifies that at the time of the 2011 Census there were a total of 475 private households comprising only students in the private rented sector. In 2021, this had nearly doubled to 917 private households being composed entirely of students.
- 7.31 The SHMA identifies this level of growth in the number of students occupying private sector dwellings in Haringey will have increased the pressure on Haringey's housing stock, particularly as there has also been a growth in households renting privately through the same period. The impact of this is exacerbated by the tendency for students to live in shared accommodation, therefore occupying homes that would otherwise be suitable for families, increasing demand for these types of homes and therefore impacting the affordability of family housing.
- 7.32 The Proposed Development provides 623 student beds and 77 new affordable homes. Applying the ratios in the London Plan means this is equivalent to the delivery of 326 homes towards housing need within Haringey. This represents a greater contribution towards housing delivery than that currently anticipated within both the currently adopted site allocation (191 homes) and the emerging site allocation (209 homes).
- 7.33 Overall, the delivery of 77 affordable homes, and the equivalent of 326 homes overall, represents a significant benefit of the Proposed Development, particularly when considered in the wider context of LBH not currently being able to demonstrate a sufficient supply of land for housing, in accordance with the requirements of the NPPF. As confirmed by the Inspector's Report (Para. 11) to Planning Appeal APP/Y5420/W/21/3289690, LBH is currently only able to demonstrate a 3.87 year supply of land for housing. The 'tilted balance', as set out in Paragraph 11d of the NPPF, therefore applies, whereby planning permission should be granted, unless any adverse impacts would significantly and demonstrably outweigh the benefits.

Affordable Housing

- 7.34 The NPPF identifies that development plan policy should set out an overall strategy for delivery of affordable housing. Paragraph 63 notes that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies, including those who require affordable housing, as well as for those people who rent their homes.



- 7.35 Policy H4 of the London Plan sets a strategic target of 50 per cent of all new homes delivered across London to be genuinely affordable. Affordable housing should be provided on site, other than in exceptional circumstances.
- 7.36 Policy H5 of the London Plan sets out the 'threshold approach' to affordable housing. This requires a minimum of 35% affordable housing to be provided by development for the scheme to be considered via the Fast Track Route, except where the proposal relates to public land or industrial land in which case the minimum requirement is increased to 50%.
- 7.37 Policy H15 applies the same threshold approach to the delivery of affordable student bedrooms within purpose-built student accommodation schemes.
- 7.38 Policy H6 of the London Plan identifies that a minimum of 30 per cent of affordable homes should be provided as low-cost rented homes; a minimum of 30 per cent as intermediate products; and the remaining 40 per cent to be determined by the borough, based on identified need.
- 7.39 Policy DM13 of the LBH Development Management DPD states that LBH will seek to maximise the provision of affordable housing, with a borough wide target of 40% affordable housing. This policy pre-dates the Fast Track Route introduced by the London Plan. Policy DM13 goes on to state that affordable housing should be provided as 60% social / affordable rent and 40% intermediate housing.

Assessment

- 7.40 A blended approach to the provision of affordable housing is proposed, such that the Proposed Development will deliver 35% of the proposed housing and student accommodation as affordable when calculated both on a habitable room and floorspace basis. The proposed hybrid approach to achieving the 35% threshold amount for the Proposed Development to be considered under the Fast Track Route has been agreed with LBH and GLA officers through pre-application discussions.
- 7.41 All of the proposed 77 homes will be provided as affordable housing, with a tenure split of 71% / 39% in favour of social rent over shared ownership. This is significantly in excess of the tenure mix requirements set out in Policy DM13 of the Local Plan and responds directly to LBH's greatest need for affordable housing being within the social rented tenure, particularly for large family homes.
- 7.42 A summary of the proposed blended affordable provision is provided within Table 1 overleaf.



Type	Units	Beds	Habitable Rooms	Affordable Beds	Affordable Habitable Rooms	Affordable Habitable Rooms (%)
Residential	77	N/A	257	N/A	257	100%
PBSA	511	623	645	53	59	9.2%
Total	588	623	902	53	316	35%

Table 1: Affordable Summary

(Note: PBSA Habitable Rooms include communal living spaces within cluster accommodation)

- 7.43 On a floorspace basis (NIA), 35% of the residential and PBSA elements of the Proposed Development are proposed to be provided as affordable. Including PBSA communal amenity, the overall NIA of the residential and PBSA development equates to 19,724sqm. Of this, 6,910sqm (35%) is proposed to be provided as either affordable housing, or affordable student accommodation.

Principle of Student Accommodation

- 7.44 The NPPF highlights the importance of boosting housing supply across the country; whilst Paragraphs 60 and 63 note the importance of providing housing for specific groups, such as students.
- 7.45 Policy H15 of the London Plan (2021) relates to the development of purpose built student accommodation. It states that Boroughs should seek to ensure that local and strategic need for purpose-built student accommodation is addressed, subject to matters including that the development contributes to a mixed and inclusive neighbourhood, is secured for students, and that the majority of bedrooms are secured through a nomination agreement. It states that the majority of the bedrooms in the development, including all of the affordable student accommodation bedrooms, should be secured through a nomination agreement for occupation by students of one or more higher education provider.
- 7.46 Part B of London Plan Policy H15 states that boroughs, student accommodation providers, and higher education providers, are encouraged to develop student accommodation in locations well connected to local services by walking, cycling and public transport, as part of mixed-use regeneration and redevelopment schemes.
- 7.47 The London Plan identifies that the overall strategic requirement for such accommodation in London has been established through the work of the Mayor's Academic Forum, and confirms a requirement for 3,500 purpose-built student accommodation bed spaces annually over the Plan period. The need to ensure the delivery of high-quality student accommodation is recognised within the Mayor of London's Housing SPG (Section 3.9), which states that specialist student accommodation makes an essential contribution to the attractiveness of London as an academic centre of excellence.



- 7.48 Policy SD6 (Part D) of the London Plan encourages the development of student accommodation in town centres to support the vitality and viability of town centres.
- 7.49 Policy DM15 (Specialist Housing) of the Local Plan identifies that student accommodation will be supported where it is required to meet a local and strategic need and is appropriately located within a Growth Area and in areas of good public transport accessibility. Part D of the Policy states that proposals for student accommodation will also need to demonstrate that:
- *There would be no loss of existing housing;*
 - *There would be no adverse impact on local amenity, in particular, the amenity of neighbouring properties and on-street parking provision;*
 - *The accommodation is of a high quality design, including consideration for unit size, daylight and sunlight;*
 - *Provision is made for units that meet the needs of students with disabilities;*
 - *The need for the additional bedspaces can be demonstrated; and*
 - *The accommodation can be secured by agreement for occupation by members of a specified educational institution(s), or, subject to viability, the proposal will provide an element of affordable student accommodation in accordance with Policy DM13.*

Assessment

- 7.50 The Site is in a highly accessible location with excellent transport connections (PTAL 6a) meaning it is within close travel distance to a number of London universities. Accordingly, the proposed inclusion of student housing as part of a mixed-use development in this highly accessible town centre location is strongly supported in policy.
- 7.51 The Proposed Development includes the provision of 623 purpose-built student accommodation beds. A Student Needs Assessment has been prepared by Cushman and Wakefield in support of the planning application which demonstrates there is a substantial need for this type of housing in London and that the Site is particularly well suited to provide this type of housing, given it benefits from excellent accessibility to public transport, general amenities, and services.
- 7.52 The Student Needs Assessment finds that the London market is structurally undersupplied with purpose built accommodation and that demand for purpose built accommodation will remain strong in Zone 3 locations such as Wood Green, which provides a balance of relative affordability and accessibility. The assessment identifies that 30% of the total demand pool for student accommodation in London is within an easy commutable distance of the Site, generally taken to be a 45-minute commute.



- 7.53 The quality of existing stock within Haringey is considerably below both the London and national average, with a need to deliver improved accommodation to meet the needs of a discerning student body. Despite this, as detailed within the Student Needs Assessment, there is currently only a limited pipeline of consented student beds within Haringey.
- 7.54 Within Table 2 below is an assessment against the criteria set out within Part A of London Plan Policy H15, which states that Boroughs should seek to ensure that local and strategic need for purpose-built student accommodation is addressed, subject to achievement of the relevant criteria.

Requirement	Response
At the neighbourhood level, the development contributes to a mixed and inclusive neighbourhood	The Site is allocated in the LBH Local Plan for town centre uses and residential accommodation. Both of these land uses are being delivered as part of the Proposed Development. The proposals also include social rent and shared ownership dwellings, and the creation of new public realm. The Proposed Development will in itself create a new mixed-use community with residents, students and the public coming onto and making use of the Site. In terms of the surrounding context, the Site is within the eastern part of the Wood Green Town Centre and a short walk from Wood Green Underground Station. The surrounding land uses, both existing and emerging, comprise a mix of housing, commercial, retail and community uses. The addition of student accommodation at the Site, combined with the proposed housing and flexible commercial space is considered to contribute positively towards this mixed-use character of the locality. The Proposed Development will therefore contribute to a mixed and inclusive neighbourhood.
The use of the accommodation is secured for students	All residents of the PBSA will be students enrolled in courses recognised by the Office for Students, as used to define students by the supporting footnote to this criterion of Policy H15. It is anticipated that the accommodation would be secured for students through relevant obligations within a S106 Agreement.
The majority of the bedrooms in the development including all of the affordable student	A commitment to reasonable endeavours in relation to nominations agreements is anticipated to form part of the associated S106 Agreement. It is widely recognised, including within the emerging



accommodation bedrooms are secured through a nomination agreement for occupation by students of one or more higher education provider	Purpose-built Student Accommodation LPG, that securing nominations agreements at the planning application stage is challenging. It is therefore proposed that a reasonable endeavours' provision be agreed with the S106 Agreement which would ensure that every effort is made to secure any necessary nominations agreements once permission has been granted. The Applicant has been actively engaging with various higher educational institutions in regard to potentially occupying student rooms within the Proposed Development, including the London School of Economics and Political Science (LSE), University College London (UCL), University of West London (UWL), and Middlesex University. The Applicant is committed to continuing these discussions following the grant of planning permission. A letter has been provided by LSE (Appendix A) confirming ongoing discussions in relation to occupying the proposed affordable student rooms.
The maximum level of accommodation is secured as affordable student accommodation as defined through the London Plan and associated guidance	The Proposed Development will implement a blended approach to affordable housing. The proposed affordable housing and affordable student bedrooms within the Proposed Development equates to 35% based on floorspace, habitable rooms, and units. The approach to affordable housing delivery is considered further in the 'Approach to Affordable Housing' section of this Planning Statement. The blended approach to the delivery of affordable housing ensures an inclusive and mixed neighbourhood is created, whilst prioritising the delivery of affordable homes for those that most need it in the borough.
The accommodation provides adequate functional living space and layout	There are no specific housing standards for student housing and given the different needs and management of student housing in comparison to conventional housing, it is not appropriate to apply standard residential design standards to student housing. The student accommodation is split into en-suite (within clusters), studio, duplex studio, 18 sqm studio, 21sqm studio, 1 bed studio and accessible studios. The proposed PBSA units are designed for high quality living. They are



	supported by a wide range of flexible spaces that encourage socialising and learning. The Amenity spaces include: • 24 hour reception • Private and social study spaces • Onsite library • Gym • Spa • Lounge and games area • Cinema and karaoke room • Social laundry • Coffee station • Secure post and parcel store room • Private dining room • Recording and podcast studio The Design and Access Statement provides a detailed overview of the PBSA.
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Table 2: London Plan Policy H15 Assessment

- 7.55 In accordance with the requirements of Policy DM15 of the Local Plan, the Proposed Development is located within the Wood Green Town Centre, a designated growth area and in a location of high public transport accessibility (PTAL 6a). Accordingly, the Site is well suited to the proposed PBSA use.
- 7.56 The proposals are of a high quality, providing an excellent standard of accommodation, and will not result in the loss of any existing housing. The Proposed Development has been designed to ensure that any amenity impacts resulting from it are suitably mitigated, as set out within the relevant sections of this Planning Statement.
- 7.57 In summary, the proposal to provide high-quality purpose built student accommodation at the Site, given its excellent public transport links, proximity to London's higher education providers, and the significant demand for additional student accommodation across London, complies with all relevant policies and is therefore considered to be acceptable in principle.

Principle of Flexible Class E (Commercial, Business and Service)

- 7.58 Policy SD6 of the London Plan states that the vitality and viability of London's varied town centres should be promoted and enhanced by encouraging strong, resilient, accessible and inclusive hubs with a diverse range of uses that meet the needs of Londoners,
- 7.59 Local Plan Policy SP10 states that LBH will promote and encourage development of retail, office, community, leisure, entertainment facilities, recreation uses, arts and cultural activities



within its town centres, with a principle focus of growth being within the Wood Green Metropolitan Centre. Policy DM41 states that proposals for new retail, leisure and cultural uses will be supported within town centres where they are consistent with the size, role and function of the centre.

- 7.60 The Site Allocation (SA9) identifies the Site for an indicative development capacity of 1,484sqm of town centre uses. It states that ground floor uses fronting Lordship Lane will be secondary town centre uses. The emerging Wood Green AAP identifies the Site for an increase in non-residential density, with an indicative development capacity of 2,088sqm of town centre floor space and 4,176sqm of employment floor space.

Assessment

- 7.61 The Proposed Development, seeks to provide 796sqm of high quality, well designed and flexible space that will maximise active frontage along Lordship Lane. The quantum of proposed Class E floor space has been informed by a Market Demand Report, prepared by Strettons, which is submitted as part of this planning application, as well as extensive pre-application discussions with LBH.
- 7.62 The Market Demand Report suggests that the provision of the 1,484sqm identified within the site allocation would be greater than the demand in the market and there would be a real risk of such quantum of space remaining vacant.
- 7.63 The Proposed Development proposes a quantum of flexible commercial space which responds to its location within the Wood Green Town Centre and contributes positively to overall placemaking within the development. This is supported by the Socio-Economic Report prepared by Cushman and Wakefield that sets out the considerable economic benefits the Proposed Development would have on the Wood Green Town Centre. There would be increased footfall and dwell time in the surrounding area, this would have a knock on effect on the Wood Green retail and leisure core.
- 7.64 The Market Demand Report considers that the proposed provision of 796sqm is more appropriate for the Site and identifies that there is expected to be sufficient demand for types of uses being considered for the Site, which include a cafe, workspace and food hall, to justify the proposed quantum of floor space. In any case, the space has been designed to be flexible and to appeal to a broad range of occupiers, to ensure that it is able to positively contribute to the vibrancy and vitality of the Wood Green Town Centre.
- 7.65 The design and quantum of proposed town centre floor space has been the focus of extensive pre-application discussions with officers at LBH. Officers have agreed that the need to ensure active frontages are provided to Lordship Lane and the proposed public realm should be of greatest importance, and concluded that the proposal to focus commercial uses along Lordship Lane, and student amenity along the public realm, would provide the greatest certainty that these spaces would remain suitably active throughout the day and evening.



Alternatives were considered which provided town centre uses fronting the proposed public realm, however, overall these were considered less suitable, given the risk that they may remain vacant, or that a future use would not provide sufficient passive surveillance of the public realm.

- 7.66 Overall, the proposed provision of flexible town centre uses is supported in relevant policy and the proposed quantum is appropriate for the Site, taking into consideration local market demands. The Proposed Development has been designed to ensure that town centre uses are focused along Lordship Lane, and that student amenity is focussed along the public realm, where it will provide activation and passive surveillance of the proposed public realm.

Loss of Existing Use (Bingo Hall)

- 7.67 The Site is currently occupied by an existing bingo hall (Sui Generis) and its associated surface level car park. The site allocation within the Local Plan states that the existing building on the Site is not required to be retained. Regardless, consideration has been given to the acceptability of the loss of the existing bingo hall use.
- 7.68 Paragraph 97 of the NPPF (2023) states that to provide the social, recreational and cultural facilities the community needs, planning policies and decisions should plan positively for the provision of facilities to enhance the sustainability of communities and residential environments; take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community; and guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs.
- 7.69 Policy SP15 of the Local Plan states that LBH will safeguard Haringey's existing recreational facilities through the protection of such facilities in areas of deficiency and through encouraging 'dual-use' of these spaces.
- 7.70 Local Plan Policy SP16 identifies that community facilities (including existing leisure facilities) should be protected and improved where possible, and promotes the efficient and multi-purpose use of community facilities.
- 7.71 Policy DM49 (Part A) states that LBH will seek to protect existing social and community facilities unless a replacement facility is provided which meets the needs of the community. Part B states that where a community facility is lost, evidence will be required that shows:

- (a) the existing facility is no longer required;*
- (b) the loss would not result in a local shortfall in provision; and*
- (c) the existing facility is not viable and there is no demand for similar community facilities.*



Assessment

- 7.72 Although the Site is allocated within the Local Plan for mixed use redevelopment and does not specifically require the retention of the existing bingo hall use, it is still necessary to consider how the proposed loss of the bingo hall is justified against other planning policies in the Local Plan. As identified above, the Local Plan indicates that such facilities should only be removed if they no longer meet an identified need or are no longer in demand, or if a replacement facility can be adequately provided elsewhere (locally) that adequately serves the same community.
- 7.73 It is firstly important to differentiate the use of the Site as a bingo hall from other forms of recreational and community facilities. With reference to Paragraph 97 of the NPPF, whilst bingo provides a social space for parts of the community, it does not necessarily enhance the sustainability of communities, improve the health or cultural well-being of the community, or contribute to enabling the day to day needs of the community to be met. In this regard, the value of the existing use in terms of its role as a community facility is far more limited than it would be for other forms of recreational or community facilities.
- 7.74 The lease on the property is due to expire in 2026, at which time it is expected that the Site will become vacant unless planning permission is granted for its redevelopment. The bingo industry has not recovered well from the pandemic and the Applicant expects that it would be challenging to find an operator to take forward the existing use beyond the current lease expiry period. Comparatively, the Proposed Development will provide a significantly improved contribution to the Town Centre through the delivery of a high quality, comprehensive mixed-use redevelopment.
- 7.75 An extensive public engagement process has been undertaken to help inform the evolution of the Proposed Development. Respondents did not raise concerns about the loss of the existing bingo hall and were largely supportive of the principle of redevelopment. Overwhelmingly, local feedback has been positive, with wide spread support for the economic and regeneration benefits the Proposed Development will deliver within the Town Centre.
- 7.76 During pre-application discussions with LBH, it was collectively agreed that rather than seeking reprovision of another community use, it would be more beneficial for the ground floor of the Proposed Development to be prioritised for those uses which could make a greater contribution to the economic vitality of the Wood Green Town Centre and the creation of active frontages throughout the day and evening.
- 7.77 The bistro within the bingo hall provides regular discounted food offers which provide an affordable meal option. Members and officers have raised comments throughout the pre-application process in relation to the loss of this particular function of the bingo hall. The Applicant has sought to respond to this concern by designing the flexible commercial space to be able to accommodate a market hall and community café. These will appeal to a broad range of the community, including older members, within the flexible Class E floorspace.



- 7.78 Overall, it is considered that the proposed loss of the existing bingo hall at the Site is justified when considered against the requirements of the above planning policies in the Local Plan. This is particularly the case when considered in the context of the other social and economic benefits the Proposed Development will deliver for Wood Green, which will be substantial and significantly outweigh the loss of the existing use.

Housing Mix

- 7.79 London Plan Policy H10 sets out a range of criteria that is to be taken into account when considering the appropriate unit mix within new developments. This includes the consideration of local evidence; the requirement to deliver mixed and inclusive neighbourhoods; a mixture of uses and tenures; and the aim to optimise housing potential on sites.
- 7.80 Policy SP2 of the Local Plan identifies the preferred affordable housing mix within individual schemes (both in terms of unit size and type) will be determined through negotiation, scheme viability assessments and driven by up to date assessments of local housing need, as set out in the Haringey Housing Strategy.
- 7.81 Policy WG2 of the emerging AAP states that sites will be required to deliver a mix of unit sizes across the AAP area, including ensuring an appropriate mix of 1, 2, and 3+ bedroom properties are created. It states that new family housing will be focussed outside of the town centre and identifies the Site as being within an 'Area Less Suitable For Family Housing'.

Assessment

- 7.82 Haringey's Housing Strategy runs from 2017-2022 and is in the process of being updated. A new housing strategy for Haringey 2024-2029 is expected to be considered for adoption by LBH imminently. On the basis that the unit mix requirements set out within the draft Housing Strategy are based on the most up to date evidence, an assessment of the proposed housing mix against the emerging Housing Strategy is provided below.

Tenure	Unit Type	No. Proposed (%)	Required (%)
Social Rent	1-bedroom	13 (25%)	10%
	2-bedroom	26 (50%)	25%
	3-bedroom	6 (12%)	45%
	4-bedroom	0	20%
	5-bedroom	7 (13%)	N/A
	Total:	52	
Shared Ownership	1-bedroom	9 (36%)	65%
	2-bedroom	12 (48%)	30%
	3+bedroom	4 (16%)	5%
	Total:	25	

Table 3: Affordable Housing Mix



- 7.83 Through pre-application discussions LBH identified that they have a particularly acute need for social rented houses for large families. The Applicant has sought to address this need through the inclusion of 7no. three-storey, 5-bedroom houses with private gardens in the southern extent of the Site. LBH have indicated strong support for the inclusion of these homes and the contribution these will make towards addressing local need is considered to be a significant benefit of the scheme.
- 7.84 Although not strictly in accordance with the mix set out in the emerging Housing Strategy, the Proposed Development comprises a good mix of dwelling sizes when taking into consideration local need and the town centre location of the Site. The emerging AAP recognises the need to ensure that the capacity of sites within the Town Centre is maximised through the provision of smaller homes (1-2 bedrooms).
- 7.85 25% of homes in the social rented tenure are proposed as family homes (3+ bedroom). This includes the large family houses, referred to above, for which LBH have advised there is a particular need within the local area. In addition to the proposed 3+ bedroom homes, 22no. 2-bedroom 4-person homes, which are widely considered suitable for small families, are proposed. On this basis, approximately 71% of proposed social rent homes are suitable for occupation by families. In light of the Site being located within a Town Centre, an Opportunity Area and designated Growth Area, where there is a requirement to balance the need to provide family housing with the need to ensure that development of a suitable density can come forward, the proposed provision is considered appropriate.
- 7.86 Within the shared ownership tenure the majority of homes are proposed as either 1 or 2-bedroom flats, broadly in alignment with LBH's stipulated mix. These will ensure that the shared ownership homes are affordable for the local community and will address the local need for affordable home ownership.
- 7.87 The Site is a highly accessible brownfield site with excellent connectivity to a wide range of services, amenities and public transport options. In accordance with the guiding principles of the NPPF, a key design objective has been to make efficient use of this key site to deliver much needed homes for LBH and London more generally, and to ensure that the homes provide a high level of amenity. The proposed mix is in part a result of this objective. In accordance with Policy H10 of the London Plan, the Proposed Development includes a large number of two-bedroom units which is wholly appropriate given the Site's highly accessible and connected location.
- 7.88 Overall, the housing mix within the Proposed Development will provide a range of unit types and sizes that has been subject to extensive discussion with housing officers at LBH and agreed as being appropriate to the Site's context. The mixture of homes that will be delivered will contribute in establishing a new mixed and balanced community whilst meeting identified housing needs, in accordance with the objectives of London Plan (2021) Policy H10 and Local Plan Policy SP2.



Design Quality

- 7.89 Paragraph 131 of the NPPF states that the creation of high-quality buildings and places is fundamental to what the planning and development process should achieve, and that good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.
- 7.90 Paragraph 135 of the NPPF requires planning policies and decisions to ensure developments function well and add to the overall quality of the area, are visually attractive as a result of good architecture, are sympathetic to local character and ensure the creation of beautiful and distinctive places.
- 7.91 The London Plan promotes development of the highest architectural quality. Chapter 3 focuses on policies relating to design.
- 7.92 Policy D4 states that Design and Access Statements submitted with development proposals should demonstrate that the proposal meets the design requirements of the London Plan. It further states that the design of development proposals should be thoroughly scrutinised by borough planning, urban design, and conservation officers, and that development proposals referable to the Mayor must have undergone at least one design review early on in their preparation before a planning application is made.
- 7.93 Policy DM12 (Part D) of the Local Plan states that mixed tenure residential development proposals must be designed to be 'tenure blind' to ensure homes across tenures are indistinguishable from one another in terms of quality of design, space standards, and building materials.
- 7.94 The site allocation (ref. SA9) applies additional design requirements in relation to this Site, including that the alignment of Wellesley Road will be extended, with townhouses provided on the southern side of the road. This has been reflected in the layout of the Proposed Development, with affordable townhouses provided in the southern part of the Site.

Assessment

- 7.95 LBH Local Plan Policy DM1 sets out several requirements in relation to the design of new buildings, including that they have regard to form, scale and massing, urban grain, maintenance of active frontages, and local architectural styles.
- 7.96 A series of key principles have informed the design of the Proposed Development, including consideration of the immediate surroundings, and the desire to deliver high-quality architecture, safe and welcoming public realm, and good amenity for existing and future residents. Further details are provided within the Design and Access Statement, prepared by Corstorphine and Wright.



- 7.97 The proposed buildings are of varying typologies and tenures, but deliberately incorporate a consistent architectural language and material palette to ensure a cohesive and contextually appropriate urban environment that integrates with its surroundings. The architecture of the buildings is further enhanced by a high quality hard and soft landscape design which creates an attractive environment for urban living which positively contributes to the character of the wider area and delivers the design-related planning policy objectives set out above.
- 7.98 The proposals have been robustly reviewed by LBH's design and conservation officers, and by the LBH Quality Review Panel (QRP) on two occasions in September and November 2023. Officers and members of the QRP have broadly supported the proposals.
- 7.99 Overall, the Proposed Development will deliver a high quality, well integrated, inclusive and sustainable place and will accord with the Section 12 of the NPPF, Chapter 3 of the London Plan, including Policy D4, and LBH policy DM1 which all seek to secure good design.

Height, Scale and Massing

- 7.100 Paragraph 129 of the NPPF states that where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site.
- 7.101 London Plan Policy D2 requires the density of development to be proportionate to a site's connectivity and accessibility and to consider the provision of future planned levels of infrastructure.
- 7.102 London Plan Policy D3 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. In this context, optimising site capacity means ensuring that development is of the most appropriate form and land use for the site. The policy goes on to state in Part B that 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, and should positively respond to local distinctiveness through matters such as scale, appearance and shape.
- 7.103 Optimising housing delivery is an objective of London Plan Policy D6, and a range of factors should be taken into account, including local context and character, public transport accessibility, and the design principles set out in the London Plan (including residential quality and public realm).
- 7.104 London Plan Policy D9 states that Development Plans should define what is considered a tall building for specific localities, the height of which will vary between and within different parts of London.



- 7.105 LBH Local Plan Policy SP11, outlines LBH approach to tall buildings stating, *‘the Council has adopted the definition of Tall and Large Buildings as those which are substantially taller than their neighbours, have a significant impact on the skyline, or are of 10 storeys and over or are otherwise larger than the threshold sizes set for referral to the Mayor of London, as set out in the London Plan.’*
- 7.106 LBH Local Plan Policy DM5 requires developments to take regard of locally significant views and vistas. Policy DM6 identifies the council expects proposals to be of an appropriate height and scale and respond to the local context and setting.
- 7.107 The site allocation (ref. SA9) identifies that heights in the south of the Site should be respectful of the existing properties on Moselle Avenue and that development should front onto Lordship Lane, with heights rising from east to west to match the buildings on either side.

Assessment

- 7.108 The proposals reach a maximum height of 9-storeys and are not substantially taller than neighbouring buildings within the Wood Green Town Centre. The Proposed Development is subsequently not considered to constitute a Tall Building as defined by relevant planning policy.
- 7.109 As the Site is in close proximity to Linear View 19 ‘Lordship Lane at Bruce Castle to Alexandra Palace’, consideration of the massing of the Proposed Development in this view has been considered throughout the design process. As set out in the Heritage Townscape and Visual Impact Assessment (HTVIA) prepared by the Townscape Consultancy, submitted as part of this planning application, the Proposed Development is fully occluded by trees and townscape from this view and the proposals will therefore have no effect on the view.
- 7.110 The Proposed Development has been designed to create a transition between the larger scale and more modern buildings of Omnibus House and the Vue Cinema complex to the immediate west, and the surrounding finer grain heritage assets to the south. This has been achieved through careful consideration to the overall approach to height and massing, materiality, and architecture of the buildings.
- 7.111 The well-considered design approach will add to the varied character of this part of Lordship Lane, with the principal facades facing north and west addressing the Wood Green town centre utilising a strong residential scale grid, which can also be seen to the east and west in other larger scale buildings fronting onto the south side of Lordship Lane. The base of Block A fronting Lordship Lane features columns which ground the building and provide a sheltered entryway into the commercial spaces that line the street. This continues the solidity of the main façade, and it adds interest and three dimensionality to the Lordship Lane streetscape.
- 7.112 The built form of the Proposed Development to the south of the Site has been carefully considered with respect to how it relates to the neighbouring residential buildings to the south of the Site. The approach to the built form in this part of the Site means the existing terrace



to Wellesley Road will be completed, reintroducing a street character which once historically existed in this location. The lower scaled massing of Buildings C and D responds to the residential character of Noel Park to the south and Vincent Estate to the east, and will deliver an improved relationship compared to the existing surface car park.

- 7.113 The height and massing of Building A fronting onto Lordship Lane, sits comfortably alongside the height and massing of the adjacent buildings of Omnibus House and Vue Cinema heading west towards the corner of High Road.
- 7.114 The roofline of all blocks are varied and articulated, with the large scale building fronting onto Lordship Lane presenting a recessive top, using setbacks and lighter toned materiality, to reduce the visual impact of the scale. The smaller scale blocks (B, C & D) to the south, all adapt to their locations and reference surrounding townscape typologies.
- 7.115 Overall, the proposed height, scale and massing of the Proposed Development is considered to be well considered and wholly appropriate for the Site, when taking into consideration relevant context and policy requirements. The Proposed Development will enhance a currently underutilised brownfield site, delivering a development that contributes positively to Wood Green town centre and the surrounding townscape, consistent with London Plan Policies D2, D3, D6 and D9; along with Local Plan policies SP11 and DM5, together with the site allocation (SA9).

Accessibility

- 7.116 London Plan Policy D5 states that development proposals should achieve the highest standards of accessible and inclusive design and that they should be able to be entered, used and exited safely, easily and with dignity for all. This is additionally reflected within Local Plan Policy DM2.
- 7.117 Policy D7 states that 10% of all dwellings must be wheelchair accessible and all other dwellings wheelchair adaptable. This is reflected in Policy SP2 of the Local Plan.
- 7.118 London Plan Policy E10 (Part H) states that serviced accommodation, which as per the GLA 'Wheelchair Accessible and Adaptable Student Accommodation Practice Note (November 2022) includes student accommodation, should provide a minimum of 10% of new bedrooms to be wheelchair-accessible.
- 7.119 Policy DM2 of the Local Plan states that Proposals should ensure that new developments: a Can be used safely, easily and with dignity by all.

Assessment

- 7.120 As set out in the Design and Access Statement, the Proposed Development has been designed to incorporate equitable access to all occupiers and users. In accordance with Policy D7 of the



London Plan and Policy SP2 of the Local Plan, 10% of the dwellings will be provided to the M4(3) Category 3: Wheelchair user dwellings standard, while the remainder will meet the M4(2) Category 2: Accessible and adaptable dwellings standard.

- 7.121 With regard to the proposed PBSA development, it is proposed that initially 5% wheelchair accessible bedrooms will be provided. The ability to adapt a further 5% of bedrooms, should the demand arise, will be secured through the S106 Agreement. This would accord with the requirements of the Building Regulations (which require 5% of student bedrooms to be accessible).
- 7.122 The student population is younger and therefore exhibit significantly lower rates of wheelchair usership than the broader population. The Applicant, being an experienced developer and operator of PBSA buildings, has extensive experience that the provision of 5% wheelchair bedrooms as part of their previous developments is already significantly above the demand for such units, and the requirements for accessible fitout of these bedrooms is such that they are subsequently less desirable to non-wheelchair users. By ensuring that the further 5% to satisfy the Practice Note (2022) are secured through the S106 Agreement, it will ensure that in the event there is a greater need for wheelchair bedrooms than is anticipated, this need can be reasonably accommodated so as to ensure equitable access for those who need it.
- 7.123 The gradient and accessibility of the proposed public realm has been considered and complies with all relevant standards and ensures level access to each of the proposed buildings.
- 7.124 Overall, the proposals will ensure high standards of accessible and inclusive design, consistent with Policies D5, D7 and E10 of the London Plan, as well as Policy DM2 of the Local Plan.

Heritage and Townscape

- 7.125 Chapter 16 of the NPPF sets out a national approach to considering potential impact of developments on heritage assets.
- 7.126 Chapter 7 of the London Plan includes further policy in relation to the protection of London's Heritage Assets. Policy HC1 Part C states that development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings.
- 7.127 Policy DM1 of the LBH Local Plan states that proposals should respond appropriately to the setting of designated and undesignated heritage assets, open spaces and existing residential communities and ensuring that these help shape local character and townscape.



Assessment

- 7.128 The planning application is supported by a Heritage Townscape and Visual Impact Assessment (HTVIA), prepared by the Townscape Consultancy. The HTVIA has been prepared with regard to all Development Plan policies relating to heritage including the key policies identified above.
- 7.129 The Site does not lie within a conservation area or contain any listed buildings, there are however a number of heritage assets surrounding the Site. These are identified below:
- Noel Park Conservation Area
 - Trinity Gardens Conservation Area
 - Top Rank Club (Grade II*)
 - Wood Green Underground Station (Grade II)
 - Church of St Mark, Noel Park (Grade II)
 - 203 High Road (The Nag's Head Public House) (Locally Listed)
 - 22 Pellatt Grove (Locally Listed)
- 7.130 The above heritage assets have been considered as part of the assessment within the HTVIA.
- 7.131 Regarding the effect on the Noel Park Conservation Area, the HTVIA concludes a minor change to a small part of the wider setting of a much larger conservation area. This would not alter the ability to appreciate the character and appearance of the conservation area, and would cause no harm. Where any perceived impact is considered to cause harm, this could only be slight and at the very low level of less than substantial harm. This very low level of harm would be outweighed by the substantial public benefits of the Proposed Development.
- 7.132 From longer range views, the HTVIA identifies there would be some visibility of the uppermost levels of the buildings, but this would not directly impact any identified designated heritage asset or the experience of the area from views within the local area. There would be no harm arising from the Proposed Development to the significance of any of the other identified designated or non-designated heritage assets, assessed through change to their setting. The Proposed Development would also not infringe on the viewers appreciation of the local Trinity Gardens Conservation Area any more so than the existing condition.
- 7.133 The HTVIA concludes that overall, the Proposed Development optimises the Site and offers a positive addition to this area of Haringey, contributing to the character of the townscape on Lordship Lane. It uses complementary materials that contextually respond to the mixed urban grain and diverse local surroundings. It would reanimate the Site's relationship with the street and add a higher quality architectural element to the local streetscape.

Public Realm

- 7.134 London Plan Policy D8 supports the creation of additional public realm and sets out how it must contribute to healthy streets, including the potential for improvements to streets, and



deliver high-quality and well-managed space in several regards including environmental considerations, and hard and soft landscaping features.

- 7.135 LBH Local Plan Policy DM2 states that new developments should ensure that safe environments are designed. This is further supported by LBH Local Plan Policy DM3, which sets out additional requirements to ensure that the public realm contributes to promoting an inclusive environment. Wherever possible, any public space created should look to connect to the Green Grid promoting social, recreational and ecological benefits.

Assessment

- 7.136 The Proposed Development incorporates a public realm that offers 2,030sqm of public open space, 636sqm of private/communal open space and 946sqm of private residential open spaces. These spaces aim to create a sense of place utilising tree planning and landscaping. They will be comprised of high quality materials and finishes that provide a shared space and designated play spaces for residents and visitors. The space will be fully accessible.
- 7.137 The proposed public realm will deliver various benefits, including providing an amenity space for new and existing residents, children's play space, urban greening, biodiversity and enhanced pedestrian and cyclist connections through the Site. The proposed open space will allow for ground floor activities to spill out into the public space and ultimately improves the townscape by adding nature to a gap in the townscape, creating somewhere appealing to pause.
- 7.138 It is proposed that the new open space will be publicly accessible throughout the day and evening. This represents a significant benefit of the Proposed Development, however, there is a clear need to ensure that the space is safe and inviting. The layout of the Proposed Development ensures that as much as possible, active ground floor uses including commercial and residential frontages address the open space and provide passive surveillance throughout all hours. Further, the principle entrance to the PBSA building has been proposed to be directly from the open space, so as to ensure a high volume of pedestrian and cycle activity.
- 7.139 Suitable lighting and CCTV will be provided, and PBSA staff will continually monitor the space to ensure no anti-social activity is occurring. This is further considered within the Crime Prevention Statement, prepared by Consultive Solutions and submitted alongside this planning application.
- 7.140 Further details in relation to the public realm are detailed within the Design and Access Statement/ Landscape Statement.
- 7.141 Overall, it is considered that the design of the proposed landscaping and public realm meets the requirements of planning policy and represents a significant benefit of the Proposed Development.



Residential Quality and Amenity

- 7.142 London Plan Policy H6 sets out several requirements in relation to housing quality. Its expectations include high-quality design with adequately sized rooms with comfortable and functional layouts, maximising the provision of dual aspect units, ensuring sufficient daylight and sunlight access, and adherence to minimum space standards.
- 7.143 The Mayor of London's 'Housing Design Standards LPG' was adopted in June 2023 and helps to interpret, the housing-related design guidance and policies set out in the London Plan 2021. It provides a set of standards that relate to housing design.
- 7.144 Policy DM12 (Part D) of the Local Plan states that all new housing must be of a high quality, taking account of the privacy and amenity of neighbouring uses, and are required to meet or exceed the minimum internal and external space standards of the London Plan and the Mayor's Housing SPG.

Assessment

- 7.145 All of the proposed affordable homes have been designed to exceed the nationally described space standard (NDSS) and will have private amenity space accessed directly from the living room, as either a garden, balcony or roof terrace. The Proposed Development offers a level of inclusive design that exceeds the minimum access requirements of the Building Regulations, local and London wide access policies. Further, the proposals were designed to accord with the Mayor of London's recently adopted Housing Design Standards LPG (2023).
- 7.146 All homes are proposed to be dual aspect and internal daylight levels will be in commensurate with the expectations of development in high density urban areas, as detailed within the 'Daylight, Sunlight and Overshadowing' section of this Planning Statement.
- 7.147 Overall, the Proposed Development has been designed to provide a high standard of residential accommodation in full accordance with the specific requirements of relevant planning policy.

Children's Play Space

- 7.148 London Plan Policy S4 states that for residential developments, proposals should incorporate good-quality, accessible play provision for all ages. At least 10 square metres of play space should be provided per child that:
- provides a stimulating environment
 - can be accessed safely from the street by children and young people independently
 - forms an integral part of the surrounding neighbourhood
 - incorporates trees and/or other forms of greenery
 - is overlooked to enable passive surveillance f) is not segregated by tenure.



Assessment

- 7.149 The proposed development generates a requirement for 683sqm of children's play space. As set out in the Landscape Design and Access Statement, prepared by Park Hood and submitted alongside this planning application, the proposed development provides 850sqm of play space. This is provided as a combination of dedicated play space and playable landscape. The proposals therefore accord with the requirements of Policy S4 of the London Plan.

Daylight, sunlight, and overshadowing

- 7.150 Paragraph 129 of the NPPF outlines that a flexible approach should be taken in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site.
- 7.151 Policy D6 of the London Plan states that development should provide sufficient daylight and sunlight to new and surrounding housing, whilst *"avoiding overheating, minimising overshadowing and maximising the usability of outside amenity space"*.
- 7.152 The Building Research Establishment (BRE) have set out in their handbook *'Site Layout Planning for Daylight and Sunlight — A Guide to Good Practice (BR209, 2022)'*, guidelines and methodology for the measurement and assessment of daylight and sunlight.
- 7.153 The Mayor's 'Housing SPG' (2016) sets out that an appropriate degree of flexibility needs to be applied when using BRE guidelines to assess the daylight and sunlight impacts of new development on surrounding properties, as well as within new developments themselves. Guidelines should be applied sensitively to higher density development, especially in opportunity areas, Town Centres, large sites and accessible locations, where BRE advice suggests.
- 7.154 Policy DM1 of the Local Plan states that the Council will support proposals that *"provide appropriate sunlight, daylight and open aspects (including private amenity space where required) to all parts of the development and adjacent buildings and land."* It further states that *"The design and layout of buildings must enable sufficient sunlight and daylight to penetrate into and between buildings, and ensure that adjoining land or properties are protected from unacceptable overshadowing."*
- 7.155 Policy DM15 of the LBH Local Plan states that any PBSA development must be of high quality design and give consideration to daylight and sunlight.
- 7.156 The Daylight and Sunlight Statement prepared by GIA identifies that the Site in its existing state is relatively underdeveloped compared to the surrounding area to its west. Densification of development on the Site, consistent with its context, will therefore result in some change in the levels of daylight and sunlight amenity within the surrounding residential properties



that are beyond BRE guidance and, as such, potentially noticeable to the occupants of those properties.

- 7.157 Despite the above, the levels of daylight and sunlight amenity that will be retained by the surrounding residential neighbours upon completion of the Proposed Development are reasonable and have previously been considered acceptable in the local context.
- 7.158 In terms of overshadowing, whilst the construction of the Proposed Development will result in a small amount of overshadowing of surrounding gardens, these are all fully BRE compliant, meaning that the users of those areas are unlikely to notice any change in their sunlight amenity.
- 7.159 Apart from the internal courtyards serving Buildings A & C, the assessments also show that, as all of the other areas will be able to benefit from at least 2 hours of Sun Hours on Ground (SHOG) to more than 50% of their areas on 21st March, they will be adequately sunlit throughout the year. Assessed on 21st June, the sunlight exposure testing of these two areas show that, whilst there will still be areas of the Building A & C courtyards that will be in shade during the summer months, there are good proportions of both areas that will benefit from at least 3 hours of sunlight.
- 7.160 Overall, it is considered that the a high level of daylight and sunlight amenity is provided to proposed residents and existing surrounding residents. Further details are provided within the Daylight, Sunlight and Overshadowing Report, prepared by GIA, submitted as part of this planning application.

Energy and Sustainability

- 7.161 This Section should be read in conjunction with the Energy Strategy prepared by Amber, and the Sustainability Statement, Circular Economy Statement, and Whole Life Carbon Assessment prepared by Enphere.
- 7.162 The provision of sustainable development is a key principle of the NPPF, where Chapter 14 requires the planning process to support the transition to a low carbon future. London Plan Policy SI2 requires development to minimise carbon emissions through sustainable design and construction, renewable energy, and connection to existing heating networks where possible. Furthermore, development must achieve 35% reduction in target carbon dioxide emissions against Building Regulations Part L (2021) levels. GLA guidance requires the remaining amount for domestic elements to be offset through a cash in lieu contribution to the relevant Borough, bringing the total offset to 100%.
- 7.163 Policy SI3 encourages energy masterplans to be developed for large-scale developments to establish the most effective energy supply options and connections to existing or planned heat networks.



- 7.164 Policy SI4 requires developments to reduce overheating and reliance on air conditioning systems through sustainable and efficient design, following a hierarchy which prioritises minimising internal heat generation and reduction of heat entering through orientation, fenestration, and insulation.
- 7.165 Policy SI7 looks to reduce waste and support the circular economy outcomes and aim to be net-zero waste, in line with the GLA's Guidance for Circular Economy Statements (2022) and Whole Life-Cycle Carbon Assessments (2022).
- 7.166 Locally, Policy SP4 of the Local Plan requires all new residential non-residential development to be zero carbon from 2016 and 2019 respectively. All new developments are required to also achieve a reduction in predicted carbon dioxide emissions from onsite renewable energy regeneration, with non-residential development required to achieve BREEAM "Very Good" and aspire to "Excellent".
- 7.167 Policy SP6 requires integrated, well-designed recycling facilities to be incorporated into all new developments.
- 7.168 Policy DM21 Promotes new developments to consider and implement sustainable design, layout and construction techniques and Policy DM22 encourages proposals that contribute to the provisions to contribute to decentralised energy networks.

Energy

- 7.169 Paragraph 157 of the NPPF supports the transition to a low carbon future and shaping places in ways that *"contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience"*. Furthermore, development should be planned in a way that can help reduce greenhouse gas emissions through its location, orientation and design.
- 7.170 Policy SI2 of the adopted London Plan states that major developments should be net zero carbon, and in meeting the zero-carbon target, should achieve reduction of at least 35% beyond Building Regulations. The policy further sets out the Mayor's energy hierarchy: use less energy ('Be Lean'), supply energy efficiently ('Be Clean'), use renewable energy ('Be Green') and monitor, verify and report of energy performance ('Be Seen').
- 7.171 Local Plan Policy DM21 states that proposals will be supported where they meet or exceed targets set out in the London Plan energy hierarchy (set out above).

Assessment

- 7.172 An Energy strategy has been prepared by Amber. This report has calculated the amount of energy consumed by the Proposed Development and its associated CO2 emissions, as well as detailing the passive and energy efficiency design measures that will be employed to minimise the operational energy use as far as reasonably possible.



- 7.173 Roof mounted photovoltaic panels are proposed to generate zero carbon electricity and air source heat pumps will provide low carbon heating and domestic hot water generation. VRF systems shall provide heating and cooling to the back of social space areas. The proposed strategy includes a centralised energy plant in Buildings A, B & C (with the plant in Building C also serving Building D).
- 7.174 Compliance with Policy SI2 (and therefore DM2) can be achieved by default through LETI. LETI is a network of built environment professionals that are collaborating in an effort to push London towards net-zero carbon emissions. LETI publishes papers to act as recommendations for the London Plan. And as such, the guidance outlined within the LETI protocols are more stringent than those found within the current London Plan.
- 7.175 As detailed within the Energy Strategy, the non-residential component of the Proposed Development (which includes the PBSA) achieves an improvement of 41% against Part L (2021), in excess of the requirements of the London Plan to achieve a minimum of 35% reduction.
- 7.176 With regard to the proposed affordable homes, LETI recommends a >50% betterment on the Part L Target Emission Rate. The proposed development achieves a 74% betterment, complying with LETI and substantially beyond the minimum requirements of the London Plan.
- 7.177 Provision will be included for district heat network connection to be introduced in the future, with routing through the Site from point of connection, should the opportunity arise. Future connection will be subject to the carbon intensity of the Wood Green energy centre and its ability to decarbonise as effectively as high efficiency air source heat pumps.

Whole Life Carbon

- 7.178 Policy SI2 of the London Plan expects developments to provide a Whole Life Carbon (WLC) Assessment and demonstrate actions taken to reduce life-cycle carbon emissions. This is supported by the GLA's Whole Lifecycle Carbon Assessment LPG, which sets out a methodology for calculating whole lifecycle carbon emissions and targets, including the GLA benchmark, which developments are expected to achieve, and an aspirational target which developments are expected to strive to achieve.
- 7.179 A Whole Life Carbon Assessment has been prepared by Ensphere and is submitted alongside this planning application. The assessment has reviewed WLC over a 60-year period, in line with the recommended RICS approach. This identified total WLC emission of 41,204,317 kgCO₂e, with embodied carbon emissions equivalent to ~501 kgCO₂e/m² (below the 850 kgCO₂e/m² threshold given by GLA for residential developments).



Circular Economy

- 7.180 Policy SI7 of the London Plan relates to reducing waste and supporting the circular economy. It requires applications to promote circular economy outcomes and aim to be net zero-waste. The policy requires submission of a Circular Economy Statement with GLA referable applications. The Circular Economy Statements LPG (2022) further sets out how these should be prepared.
- 7.181 A Circular Economy Statement has been proposed by Ensphere and is submitted alongside this planning application. It provides an overview as to how the Proposed Development has set strategic approach goals in the context of the design and construction considerations.
- 7.182 As described within the Circular Economy Statement, the potential to retain or refurbish existing structures on the Site was considered and discounted, as doing so would not enable the delivery of the Proposed Development and the scale envisaged by the site allocation.
- 7.183 A range of commitments are proposed; and these will be managed and recorded through a range of documentation. Key commitments include:
- Design for adaptability and flexibility;
 - The use of materials that have high durability for longevity;
 - Diversion of demolition and construction waste from landfill by converting elements and materials for alternative use;
 - Efficient construction and operational waste management via accessible, dedicated areas for segregated waste volumes.
- 7.184 Overall, the proposals for the Proposed Development will account for the overarching values of Circular Economy including conserving resources, designing to eliminate waste and managing waste sustainably.

Overheating

- 7.185 Paragraph 158 of the NPPF requires a proactive approach to the risk of overheating. There is a very significant risk of overheating in new developments and this is a particular concern for vulnerable occupiers and users.
- 7.186 London Plan Policy SI4 expects development to minimise adverse impacts on the urban heat island through design, layout, orientation, materials and the incorporation of green infrastructure. This has been considered by the teams throughout the design process. Additionally, London Plan Policy 5.9 requires developments to reduce both overheating and reliance on air conditioning systems.
- 7.187 Local Plan Policy DM21 supports development proposals that demonstrate that the risks of overheating have been addressed through the design of the development and accord with the



Mayor's cooling hierarchy. Designs must reduce overheating in line with the Cooling Hierarchy.

Assessment

- 7.188 The Proposed Development has been assessed for thermal comfort against all relevant criteria and guidance. The thermal analysis confirms that the bedrooms, studios, living rooms and kitchens within the buildings all comply with the relevant criteria. The commercial unit and PBSA amenity spaces will be provided with comfort cooling.
- 7.189 The results of the analysis undertaken confirm that the risk of overheating within occupied areas has been mitigated to be within the limits set by the prevailing legislation and guidance. Passive shading and ventilation has been designed into the scheme from the outset, particularly for windows facing east, south and west. Solar control glazing will be provided to all windows throughout the development to limit summertime solar gains and overheating, so reducing the requirement for mechanical cooling systems and increased mechanical ventilation rates.
- 7.190 Due to the fairly constrained nature of the site and access requirements for a mixed-use development there has been limited scope to refine building orientation to limit solar gain. However, the layout of the buildings results in the south elevation of the PBSA Building A having very limited windows facing that direction, therefore limiting solar gain significantly to rooms. The most affected façade in terms of overheating is the northern façade, where any external features (e.g. shading devices etc) would in any case have very little impact, given this side of the building will be shaded most of the time.
- 7.191 As detailed within the Thermal Comfort Assessment prepared by Amber, submitted alongside this planning application, it is considered that overall the Proposed Development accords with National, Regional and Local planning policies in relation to overheating and is therefore acceptable.

Urban Greening

- 7.192 Policy G5 of the London Plan states that major developments 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"*. It sets out an Urban Greening Factor of 0.4 for predominantly residential developments and 0.3 for all other developments. In this case, the relevant target is 0.3.

Assessment

- 7.193 As set out in the Urban Greening Factor calculation, prepared by Wardell Armstrong, the Proposed Development achieves an Urban Greening Factor of 0.28. Although falling



marginally short of the required 0.3, opportunities for greening across the site have been maximised when taking into consideration the various constraints, including the need to provide access through the site and to optimise the proposed public realm in terms of usability and functionality. It is additionally noted that despite a marginal non-compliance with the requirement, the Proposed Development provide a Biodiversity Net Gain significantly in excess of requirements.

Socio-Economics

- 7.194 This section should be read in conjunction with the Socio-Economics Benefits Statement prepared by Cushman & Wakefield submitted alongside the planning application.
- 7.195 Chapter 6 of the NPPF *‘Building a strong, competitive economy’* outlines that planning policies should *“set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth”* (Paragraph 86a).
- 7.196 Chapter 8 of the NPPF outlines how planning policy *“should aim to achieve healthy, inclusive and safe places”*. Much of this guidance is relevant to socio-economics, including the need for local authorities to:
- *“Plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services”* (Paragraph 97a); and
 - *“Ensure an integrated approach to considering the location of housing, economic uses and community facilities and services”* (Paragraph 97e).

Assessment

- 7.197 The Socio-Economics Assessment has focussed on key social and economic considerations, including the creation of jobs, homes and the physical environment.
- 7.198 During the demolition and construction stage, it is anticipated the Proposed Development would generate 184 full-time equivalent (FTE) gross construction jobs per annum throughout the build programme. The construction phase will contribute to the economy in the form of Gross Value Added (GVA). Construction GVA output per job of £85,979 is assumed based on 2020 ONS output per job data for the construction industry at the London region uplifted using the GDP deflator to 2023/24 prices. Applying this to the estimated net additional construction jobs, after accounting for leakage and other economic considerations, provides an estimated £8.2 million GVA per annum generated into the London economy over the two and a half year construction phase.
- 7.199 Once operational, the Proposed Development is estimated to create in the order of 65 direct gross FTE jobs as follows:



- PBSA – 14 jobs
- Offices – 17 jobs
- Café/Food Hall – 34 jobs
- Total – 65 jobs

- 7.200 Applying the GVA output figures to the anticipated 12 FTE net additional office and 32 FTE PBSA/cafe jobs provides an estimated £2.12 million GVA per annum, less the £471,200 currently accounted for by the 19 existing Mecca Bingo jobs, resulting in an estimated £1.65 million uplift in GVA generated into the London economy per annum.
- 7.201 It is estimated that full time students in London spend an average of £569 per month on living costs (excluding rent and household bills) including food, clothes, personal items, entertainment, household goods, non-course travel and other living costs. Applying the London based spending assumption to the 623 anticipated students within the Proposed Development generates a total likely additional term time (9 month) student expenditure of c.£3.19 million per annum. Given the proximity of the Site to the Wood Green town centre, a significant proportion of this additional student expenditure is likely to be local and will benefit local businesses bringing a positive supply chain effect to the wider Haringey area.
- 7.202 Indirect employment effects will also be generated through the uptake of jobs by the new student residents. Based on the findings of latest NatWest Student Living Index (2023), London students work an average of 18.74 hours of part time work per month during term time. Applying this to the potential maximum 623 students that could be accommodated within the Proposed Development generates an equivalent of 72 FTE gross jobs that could be supported by students living within the Proposed Development. Owing to the often part time nature of these jobs, many are likely to be local to Wood Green.
- 7.203 It is considered that overall the economic benefits of the Proposed Development constitute a significant benefit in terms of its contribution to the regeneration of the Wood Green Town Centre, in accordance with Chapters 6 and 8 of the NPPF.

Transport

- 7.204 Chapter 9 of the NPPF promotes the use of sustainable transport and notes that all developments that will generate significant amounts of movement should be required to provide a travel plan. Significant development should be focussed on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. Development proposals should (para. 116):
- a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage



public transport use;

- b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport;
- c) create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;
- d) allow for the efficient delivery of goods, and access by service and emergency vehicles; and
- e) be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.

- 7.205 Policy T1 of the London Plan requires all developments to 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.
- 7.206 Policy T4 of the London Plan highlights the need for transport assessments/statements to be submitted with development proposals. This is to ensure that the impacts on the capacity of the transport network from any proposed development is fully assessed. Transport assessments should focus on embedding the 'Healthy Streets Approach' within the proposed development and surrounding area.
- 7.207 In addition, Policy T5 of the adopted London Plan sets out that development should encourage cycling and provides new cycle parking standards. Cycle parking and cycle parking areas should allow easy access and provide facilities for disabled cyclists. Policy D2 expects the higher density of development the lower car parking provision.

Assessment

- 7.208 A Transport Assessment and Travel Plan, prepared by Calibro, accompany the planning application. These reports provide a comprehensive review of the Proposed Development and a robust assessment of its compliance with the above transport policies.
- 7.209 The Transport Assessment concludes the Proposed Development complies with and actively supports the principles of sustainable development, and in this way would support the response to the climate emergency and decarbonising transport agenda. The movement strategy associated within the Proposed Development will encourage and facilitate Active Travel mode choices amongst future residents, ensuring that they are able to efficiently access a range of local facilities without the need of a private car.

Parking and Servicing



- 7.210 Policy T6 of the London Plan states that car parking should be restricted in line with levels of existing and future public transport accessibility and connectivity. 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.
- 7.211 Policy T6.1 relates to residential parking and states that disabled persons parking should be provided for new residential developments. It states that residential development proposals delivering ten or more units must, as a minimum ensure that at least one designated disabled persons parking bay is available for 3% of dwellings, and demonstrate how an additional 7% of dwellings could be provided with one designated disabled persons parking space in the future.
- 7.212 Policy T6.5 relates to non-residential disabled persons parking and states that all proposals should provide at least one space, even if no general parking is provided.
- 7.213 Part G of Policy T7 of the London Plan states that development proposals should facilitate safe, clean, and efficient deliveries and servicing. Provision of adequate space for servicing, storage and deliveries should be made off- street, with on-street loading bays only used where this is not possible. Construction Logistics Plans and Delivery and Servicing Plans will be required and should be developed in accordance with Transport for London guidance and in a way which reflects the scale and complexities of developments.
- 7.214 Chapter 5 of the LBH Local Plan addresses Transport and Parking. Policy DM31 focuses on sustainable transport and emphasises LBH's support for car free developments.
- 7.215 Policy DM32 of the Local Plan states that development proposals will be assessed against the car parking and cycle parking standards set out in the London Plan. It goes on to state that LBH will strongly encourage contributions to car club schemes or the provision of car club bays as an alternative to on-site car parking.

Assessment

- 7.216 The Proposed Development will be car free, in line with London Plan Policy T6. With regard to disabled parking, the Proposed Development will deliver a total of 6 blue badge spaces. These will be comprised of 4no. residential spaces (equivalent to one space for 5% of dwellings), 1no. PBSA space and 1no. space associated with the ground floor commercial component. non-residential. The proposals have also identified capacity for an additional 4no. residential spaces along Wellesley Road, should the demand for these arise in the future.
- 7.217 Residents of family homes will be offered an improved access to the local car-sharing, which will assist in alleviating the need for the ownership of individual cars.
- 7.218 Overall, the car parking arrangements proposed are considered to accord with the car parking standards of both the London Plan and the LBH Local Plan. For further information refer to the Transport Assessment, provided by Calibro, submitted in support of this application.



Cycle Parking

7.219 The required cycle parking provision to support the Proposed Development has been established in line with the requirements of the London Plan (2021) as follows:

Student Accommodation

- 0.75 spaces per bedroom,
- In addition, 1 short stay cycle parking spaces per 40 Beds.

Residential Dwellings

- 1 space per studio or 1 person 1 bedroom dwelling,
- 1.5 spaces per 2 person 1 bedroom dwelling
- 2 spaces per all other dwellings,
- In addition, 2 short stay spaces for the first 40 dwellings and 1 short stay cycle parking spaces per 40 dwellings thereafter.

Commercial (Class E) use - (A2-A5 use considered for calculations as a worst-case scenario)

- 1 space per 175m² GFA,
- In addition, 1 short stay cycle parking spaces per 40m² GFA.

7.220 Based on these requirement, the Proposed Development includes the following long-stay cycle parking spaces:

- Building A (PBSA / Commercial) - 466 long stay parking
- Building B (Residential) - 48 long stay parking
- Buildings C & D (Residential) - 62 long stay parking

7.221 Cycling parking facilities will be provided in secure bike stores located within each building and will therefore be accessible to all students and residents of the development.

7.222 20 visitor spaces will be provided throughout the Site by the entrances of each blocks for the residential and PBSA elements of the Proposed Development, with a further 8 short stay spaces provided to the north of the Site for the commercial element. Whilst this is under the recommended provision of visitor spaces for a café, a large part of the future clientele is expected to be generated from the future students and residents, therefore reducing the need for cycle parking.

7.223 Overall, the cycle parking within the Proposed Development has been assessed as complying with all relevant requirements in planning policy.



Fire Safety

- 7.224 In the interests of fire safety and to ensure the safety of all building users, Policy D5 of the London Plan requires development proposals to be designed to incorporate safe and dignified emergency evacuation for all building users. Policy D12 seeks to ensure that development proposals achieve the highest standards of fire safety.

Assessment

- 7.225 In accordance with Policies D5 and D12, A Fire Safety Strategy Report, prepared by Helios, is submitted alongside this planning application and confirms that the proposals comply with the relevant legislation and guidance.

Air Quality

- 7.226 The NPPF states that the purpose of the planning system is to contribute to the achievement of sustainable development. Paragraph 180 of the NPPF states that “planning policies and decisions should contribute to and enhance the natural and local environment by preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air quality”.
- 7.227 Policy SI 1 of the London Plan states that “development plans, through relevant strategic, site specific and area-based policies, should seek opportunities to identify and deliver further improvements to air quality and should not reduce air quality benefits that result from the Mayor’s or borough’s activities to improve air quality”.
- 7.228 Furthermore, Local Plan Policy DM23 states that development proposals will consider air quality implications throughout the whole development to ensure compliance with the Haringey Air Quality Management Area (AQMA).

Assessment

- 7.229 The planning application is supported by an Air Quality Assessment prepared by PEC Ltd. The assessment provides an appraisal of the baseline air quality at the Site using the most up to date publicly available data. It further aims to provide an assessment of the impact of activities during the construction and operational phases of the Proposed Development.
- 7.230 During the construction works, a range of best practice mitigation measures will be implemented to reduce dust emissions and the overall effect will x; appropriate measures have been set out in the appendices to this chapter, to be included in the Air Quality Assessment prepared by PEC Ltd.



- 7.231 Overall, the construction and operational air quality effects of the Proposed Development are judged to be not significant during the construction phase and not significant upon completion due to the fact that the anticipated traffic flows are below the relevant EPUK and IAQM assessment thresholds. Proposed Development has also been shown to be Air Quality Neutral in line with the GLA's guidance and therefore complies with LBH, GLA and NPPF policy.

Flood Risk and Sustainable Drainage

- 7.232 London Plan Policy SI 13 specifies that development proposals should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible. Policy SI 13 sets out a preference for green over grey features and a drainage hierarchy which should be followed.
- 7.233 Local Plan Policy DM24 requires proposals to demonstrate that development within the area at risk of fluvial flooding from the River Brent, reduces flood risk and improves floor storage in the area. Moreover, it requires proposals to address potential flood risk associated with any changes to topography or hydrology.

Assessment

- 7.234 The submitted Drainage Strategy prepared by Farrow Walsh, follows the drainage hierarchy and considers the suitability of Sustainable Drainage Systems (SuDS) and how they are implemented on the Site.
- 7.235 The Proposed Development sits within Flood Zone 1 and there is no quantifiable risk of flooding from tidal events. There is a low risk of flooding from Rivers and Seas. Additionally there is a low risk of flooding from ground or surface water. It can therefore be concluded that the Site has passed the exemption test and can be development with more vulnerable uses.

Ecology

- 7.236 NPPF Paragraph 180 anticipates development to contribute to and enhance the natural and local environment, including by:
- a) Protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils; and
 - b) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.
- 7.237 London Plan Policy D8 encourages incorporation of green infrastructure into a development, whilst policy G1 seeks the enhancement of green networks within London.



- 7.238 A Biodiversity Net Gain (BNG) assessment has been carried out using Department for Environment, Food and Rural Affairs (DEFRA) Biodiversity Metric Calculation and forms part of the planning application submission.
- 7.239 The Proposed Development will see the percentage net change of inhabitable units increase by 775.26%.
- 7.240 A Preliminary Ecological Appraisal has also been submitted with this planning application which concludes that there are no significant ecological constraints to the development and that with appropriate mitigation measures, ecological receptors would not be adversely affected.



8. S106 Planning Obligations and Community Infrastructure Levy (CIL)

- 8.1 This section sets out a summary of the draft section 106 heads of terms for the Proposed Development, including financial non-financial contributions, as well Community Infrastructure Levy (CIL) contributions.
- 8.2 The draft heads of terms have been considered in relation to the Council's Section 106 Planning Obligations SPD, adopted in March 2018.
- 8.3 The proposed draft heads of terms relate to the following:
- Local Employment and Training
 - Carbon Offset Contribution
 - Affordable Housing – 77no, social rented and shared ownership homes
 - Affordable Student Accommodation – 62 student beds
 - Student Accommodation Nominations Agreement for the majority of the student beds
 - Travel Plan (including contribution to local car club)
 - Open Space
 - Public Art
 - Monitoring and Administration Costs
- 8.4 It is envisaged that discussions relating to the draft heads of terms will continue with LBH during the determination of the planning application.
- 8.5 In relation to CIL, the LBH CIL Charging Schedule came into effect in September 2022 and sets a rate of £229.21 per sqm for the development of both residential and student accommodation within the 'Central Zone'. The rate for office and small scale retail is £0 per sqm.
- 8.6 The latest Mayoral CIL Charging Schedule ('MCIL2') was adopted in January 2019 and applies a rate of £60 per sqm for development in LBH.



9. Benefits of the Proposed Development

- 9.1 This Section of the Planning Statement summarises the key planning benefits as well as the wider benefits that the Proposed Development will deliver.
- 9.2 The Proposed Development will deliver the regeneration of a currently underutilised Town Centre site, to provide much needed affordable housing, student accommodation, and flexible commercial floor space. The Proposed Development will bring about a range of social, economic and environmental benefits and will fulfil the potential of an allocated Site within the Wood Green Opportunity Area, and an identified local Growth Area. Moreover, the Proposed Development will create a new destination to live, work and visit.
- 9.3 The Proposed Development delivers considerable social, economic and environmental regeneration benefits. This can be summarised, but not limited to as follows:
- Helping to create a mixed and balanced community through the delivery of 77no. new affordable homes of varying sizes and tenures, including 7no. 5-bedroom social rented houses, for which there is a particularly acute local need. These homes will contribute significantly to LBTH's and London's housing need requirements.
 - The delivery of much needed student accommodation to address an identified need and support London's role as a centre for educational excellence.
 - The delivery of an equivalent of 326 homes towards Haringey's significant local need for housing, when accounting for the delivery of affordable homes and the contribution of student housing to freeing up traditional homes for the wider community, in particular families.
 - The optimisation of site potential and density to deliver a highly sustainable and accessible site, which benefits from a highly accessible location within an opportunity area, and will optimise the potential of the Site to deliver new homes, employment, and retail opportunities, in line with policy objectives.
 - Supporting the Wood Green Town Centre - A significant benefit from the attraction of c.777 new residents and c.25 new jobs will be to increase footfall and spend in the shops and facilities in the local Wood Green Town Centre. In addition to the local spend that this will generate, the enhanced activity and vibrancy could encourage further investment by new commercial, retail and leisure occupiers as it will give them confidence that the area is thriving. Increasing the resident population in the locality should also support businesses to extend their hours of operation to attract workers to visit the area after work and residents to visit as they return from work.
 - The delivery of 2,165sqm of new and enhanced public realm, providing a variety of space for play and relaxation, providing an uplift in biodiversity and a much improved pedestrian and cycle connection through the Site.



- 9.4 It is estimated that the Proposed Development on completion will also generate tangible, wider benefits including through Community Infrastructure Levy (CIL) payments to the Mayor of London and LBH, S106 contributions, and the generation of spin off benefits to local businesses through the local supply chain and employee expenditure.
- 9.5 To conclude, the Proposed Development provides an exciting opportunity to deliver significant regeneration of the Site and the surrounding Wood Green Town Centre. The Proposed Development will bring about a range of social, economic and environmental benefits and will fulfil the potential of the Site to create a new destination to live, work and visit.



10. Conclusions

- 10.1 Section 70 of the Town and Country Planning Act 1990 and Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires proposals to be determined in accordance with the development plan, unless other material considerations indicate otherwise. The Proposed Development has been subject to detailed assessment against national, regional and local planning policy and guidance and has been found to be in general accordance with the development plan and is supported by other material considerations.
- 10.2 The proposals have been subject to a comprehensive consultation exercise involving pre-application meetings with officers from LBH and key consultees such as the GLA, TfL, local residents, businesses and amenity groups. The issues raised by these stakeholders have been considered and incorporated into the development of the final proposals, where practicable. Consultation will continue throughout the determination period.
- 10.3 The Proposed Development will deliver against relevant policy objectives and provide significant public benefits, including the delivery of 77 much needed affordable homes and the overall delivery of the equivalent of 326 homes. It will make the best use of this highly accessible Site, located within an Opportunity Area, identified Growth Area, and allocated for comprehensive mixed use development in the Local Plan.
- 10.4 The Proposed Development will also provide Mayoral and Haringey Community Infrastructure Levy contributions and appropriate planning obligations to mitigate its impact, providing considerable economic benefits which would assist in the provision of infrastructure and further improvement of the local area.
- 10.5 The impacts of the Proposed Development have been fully assessed by the supporting application documents, and mitigation measures have been identified and incorporated, where necessary and practicable. The Proposed Development is considered to be entirely appropriate for the Site and the surrounding area from an environmental perspective.
- 10.6 Overall, the Proposed Development will deliver an exemplary scheme which will deliver many regeneration benefits – economic, environmental and social. For the reasons outlined above, the principle of the development is consistent with the objectives of national planning policy and in accordance with the Government's overarching objectives for sustainable growth. The Proposed Development is in general accordance with the Development Plan and supported by other material considerations. It represents sustainable development and should therefore be granted planning permission.



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