

REF: R01008/MR/AP
VIA PLANNING PORTAL

London Borough of Haringey Council
6th Floor
River Park House
225 High Road
Wood Green
London
N22 8HQ

28 June 2024

Dear Sir / Madam,

NON-MATERIAL AMENDMENT TO VARY PLANS APPROVED UNDER LPA REF. HGY/2021/2304
29-33, THE HALE, LONDON, N17 9JZ

I write on behalf of the Applicant, Crosstree Real Estate Partners LLP, to submit a non-material amendment application to vary the approved plans under LPA ref. HGY/2021/2304, located at 29-33, The Hale, London, N17 9JZ.

Background to the Proposals

Planning permission was granted on 30th August 2023 under LPA ref. HGY/2021/2304 for:

“Redevelopment of site including demolition of existing buildings to provide a part 7, part 24 storey building of purpose-built student accommodation [PBSA] (Sui Generis); with part commercial uses [retail] (Use Class E(a)) at ground and first floor; and associated access, landscaping works, cycle parking, and wind mitigation measures.”

A new team has acquired the site. Crosstree, acting as the investor, and RG Real Estate, the appointed developer, have embarked on a comprehensive evaluation of the scheme and the site's contextual intricacies. ROK Planning have been appointed as the lead planning consultant for the project, and Hadfield Cawkwell Davidson as the lead architect. Through this assessment, challenges pertaining to buildability have been identified, including misaligned stair cores and internal layout discrepancies necessitating its reconfiguration and submission for an NMA. The new delivery team and the proposed changes were discussed at a pre-application meeting on 7th May 2024. A formal note of this meeting was agreed on 19th June 2024. In summary, the proposed amendments comprise of the following:

- Redesign of some of the accessible rooms and minor reconfiguration of bedrooms to ensure compliance with DDA requirements respectively, ensuring compliance with the Section 106

Agreement and Planning Condition 4, without impacting bed numbers.

- Redesign of basement, including a minor reduction in size for buildability issues relating to the retaining wall structure required to support the surrounding site, with no impact on cycle parking or bin storage.
- Redesign of core and minor changes to internal layouts to comply with fire regulations, ensuring safety, again without affecting bed numbers.
- Confirmation and addition of ASHP heating solution, with ASHPs to be located on the roof, requiring a temporary reduction in the floor area of the terrace unit the DEN is installed and at the end of the useful life of the ASHP's. ASHP positioning to be shown on the terrace level plan. Overall, the external amenity space will be increased once the ASHP's have been removed and connection made to the DEN.
- Relocation of the laundry to the first floor and converting the current laundry into 1no. additional Studio at level 7. This layout replicates the Studio in this same location on floors 1-23, so this allows the services to stack much more efficiently in this new arrangement. It results in 1 no. additional student room.
- Amenity Space – as a result of the layout changes noted above, the total area of amenity space has changed marginally in order to achieve a compliant scheme.

These proposals are detailed further below and within the Design and Access Statement prepared by Hadfield Cawkwell Davidson Architects.

Acceptability and Justification of Proposed Amendments

A non-material amendment application is sought for the following changes to the scheme approved under LPA ref. HGY/2021/2304.

Scope of NMA

It is notable that there is no statutory definition of non-material, and this will depend on the context of the scheme. In addition to the justification provided above, the following is notable in this instance:

- The overall footprint of the approved built form will not be extended;
- The scale and height of the approved built form will remain as permitted;
- The permitted use of the building will remain as approved;
- The amendments are planning policy compliant;
- The amendments will result in only minor changes in appearance;
- The amendments will not breach any of the conditions attached to the planning permission; and
- The red line has not been extended.

It is notable that the pre-application concluded that officers were open to an NMA for the following reasons:

- The changes were driven by the need to comply with statutory requirements, including the Building Safety Act and British Standards (BS8300), which were beyond the control of the applicant. The officers acknowledged that these changes were necessary for compliance and to make the scheme buildable;
- The officers noted that while there were reductions in kitchen and amenity spaces, the overall impact was considered minimal;
- The officers found the proposed reconfigurations feasible and convincing, especially concerning accessible rooms and amenity spaces. They recognised the balance between meeting regulatory demands and maintaining functional and liveable spaces; and
- The officers expressed sympathy towards the necessary changes and indicated flexibility. They were open to reviewing the applicant's evidence and suggestions, which supported the argument for NMA status.

Fire Safety

Ashton Fire has been appointed to provide fire safety advice for the development's Building Regulation submission and ongoing design support.

These changes enhance the existing fire safety design provisions, aligning with the latest building safety standards, including guidance from Approved Document B (March 2024 amendments) on stair and evacuation lift protection. Key fire safety arrangements include:

- Dedicated lobbies for each escape stair;
- Segregation and suitable separation of evacuation and firefighting lifts from communal areas;
- Provision of smoke ventilation systems in corridors and lobbies;
- Enhanced protection for escape routes at ground floor level; and
- Application of best practice fire safety design.

The proposed design demonstrates a proactive approach to ensuring the highest level of safety for all occupants.

Each minor change is now addressed in detail in the following paragraphs.

Reconfiguration of Accessible Bedrooms

The proposed reconfiguration of accessible bedrooms is aimed at meeting a 15% provision of accessible rooms in accordance with BS8300-2:2018. This includes 23 wheelchair accessible rooms (5%), 5 hoist rooms (1%), 24 ambulant accessible rooms (5%), and 18 wheelchair adaptable rooms (4%). Key changes involve relocating a studio out of the Cluster Flat on the south wing, creating 2 fully accessible

studios along the western elevation, and reconfiguring a 5-bed Cluster Flat by repositioning the cluster kitchen to achieve a minimum size of 20m².

The current approved drawings do not allow for such large bathroom sizes for the wheelchair and hoist provisions, and thus this NMA application proposes the necessary amendments to secure the appropriate provision of accessible rooms. The newly proposed plans look to reconfigure the different types of room with minimal change & no room loss/gain.

The proposed changes meet the requirements of Policy DM15 of the Haringey Development Management Development Plan Document (2017) and London Plan policies D5 and E10 Part H. By ensuring 15% of the rooms are accessible, including wheelchair accessible, hoist, ambulant accessible, and wheelchair adaptable rooms as stipulated in BS8300-2:2018, the design ensures compliance with inclusivity standards. The reconfiguration to include accessible studios along the western elevation and adjustments to the kitchen sizes ensures that the living spaces remain functional and accessible. The committee report supports this by highlighting the importance of providing high-quality, accessible accommodations and adhering to inclusive design principles.

Reconfiguration of Basement

The basement's Gross Internal Area (GIA) will need to be reduced to accommodate the proposed structural retaining solution, which entails a contiguous piled retaining wall with a capping beam along the building's perimeter. This reduction in internal space necessitates minor revisions to the basement layout. Additionally, the plant room spaces have been refined to include the required area for a District Heating Network (DHN) Sub-Station. The basement layout has been reassessed with a more detailed plant strategy for the site, and the revised basement plan now reflects the necessary plant equipment to serve the building.

Furthermore, it was identified that the basement stair on the right-hand side of the plan was not separated from the levels above, a condition that must be rectified to comply with building regulations. This issue has been addressed in the revised plan layout.

As a result of the reduced GIA of the basement, the approved cycle parking numbers have been altered slightly. The table below outlines the changes in cycle parking numbers. This is clarified further in the Design and Access Statement.

For the consented uses (PBSA and Use Class E(a)), the minimum GLA standards are as follows:

Student Accommodation Cycle Parking Standards:

- Long stay: 0.75 cycle parking spaces per bed
- Short stay: 1 cycle parking space per 40 beds

Use Class E(a) Cycle Parking Standards:

- Long stay: 1 space per 250 sqm gross external area (GEA)
- Short stay: 1 space per 125 sqm gross external area (GEA)

Based on the floorspace, number of student beds and the GLA cycle parking requirements, the scheme must include at a minimum:

Student Accommodation Cycle Parking:

- Long stay: 324 cycle parking spaces
- Short stay: 11 cycle parking spaces

Use Class E(a) Cycle Parking:

- Long stay: approximately 2 cycle parking spaces
- Short stay: approximately 5 cycle parking spaces

Total Minimum Requirement:

- 342 cycle parking spaces

In the revised scheme, we are providing:

Long Stay Spaces:

- 7 non-standard spaced hoops (14 spaces)
- 7 standard spaced hoops (14 spaces)
- 3 mobility scooter parking spaces
- 300 cycle parking spaces on double-stacked rack units

Short Stay Spaces:

- 10 hoops (20 cycle parking spaces)

Total Proposed Provision:

- Long stay: 331 cycle parking spaces
- Short stay: 20 cycle parking spaces
- **Total: 351 cycle parking spaces**

This represents an over-provision of 9 cycle parking spaces.

Overall, the reduction in the basement's GIA to accommodate structural retaining solutions aligns with Policy DM18 of the Haringey Development Management Development Plan Document (2017) and London Plan Policy SI3. The inclusion of a DHN Sub-Station is in line with sustainable energy policies, ensuring that the development is ready for future connection to a communal heating system. By ensuring the basement stair is separated from upper levels, the design adheres to building regulations, enhancing safety and compliance.

Reconfiguration of Cores and Ground Floor Layout

The reconfiguration of cores and the ground floor layout involves minor adjustments to the internal stair/lift core layouts. The basement stair will now be separated from the upper levels, and a revised smoke ventilation strategy will be implemented, providing two smoke shafts per stair/lift core, as reviewed by Ashton Fire. The ground floor layout has been modified to avoid non-compliant convergence of residential and retail final exit routes and to improve bin store access arrangements.

Policy D12 of the London Plan (2021) requires that development proposals must achieve the highest fire safety standards by identifying unobstructed outside spaces for fire appliances and evacuation assembly points, incorporating features to reduce fire risks, constructing to minimise fire spread, providing suitable means of escape and evacuation strategies, developing a robust and updateable evacuation strategy, and ensuring suitable access and equipment for firefighting. In addition, Policy SP6 of the Haringey Development Management Development Plan Document (2017) mandates safe and efficient design for all developments.

The reconfiguration of cores and the ground floor layout ensures enhanced fire safety compliance, addressing feedback from the fire engineer and aligning with Policy D12 and Haringey Policy SP6. By separating residential from retail exits and providing adequate smoke ventilation, the proposal meets safety and design standards.

Air Source Heat Pump Solution

As a temporary heating solution, an Air Source Heat Pump (ASHP) system is proposed until a connection to the DHN can be secured and at the end of their useful lifespan. The ASHP units will be located on the roof at level 24, with screening to minimise visibility from the adjacent amenity roof terrace and street level. This temporary solution ensures that the building can meet heating and hot water generation needs in the interim.

Policy DM1 of the Haringey Development Management Development Plan Document (2017) requires developments to contribute positively to the local area through high-quality design and emphasises the

importance of functional, safe, and visually appealing design solutions. The ASHP units are strategically placed on the roof, ensuring they do not compromise the building's aesthetic appeal. Screening the units from the adjacent amenity roof terrace area ensures that the visual integrity of the space is maintained. The elevation projection above the ASHP units prevents them from being visible from street level, preserving the building's external appearance and the overall streetscape. By screening the ASHP units and ensuring they are not visible from the street, the proposal minimises any potential negative visual impact. The design solution maintains the functionality of the roof space without compromising its use as an amenity area, which aligns with the policy's emphasis on maintaining high-quality design standards.

Overall, the temporary ASHP solution aligns with Haringey's design policies, providing a sustainable and low-carbon heating solution if DHN connection is delayed. The placement and screening of these units ensure minimal visual impact, maintaining compliance with sustainability and visual impact guidelines. Can we add a comment about the parapet wall blocking the view from street level

Relocation of Laundry / Additional Studio

The laundry will be relocated to the first floor next to the gym, accessible from the main stair/lift core. The current laundry space at level 7 will be converted into an additional studio, increasing the total number of student rooms to 432. This change allows for more efficient stacking of services across all floors.

Firstly, it should be noted that this proposed minor amendment is not a material change to approved scheme. It does not significantly alter the building's approved use, external appearance, or structural integrity. The changes are primarily internal adjustments aimed at improving efficiency and slightly increasing capacity without imposing new planning impacts.

The proposed relocation of the laundry to the first floor, with direct access from the main stair/lift core, and placing it next to the gym enhances both accessibility and functional use of space. This strategic move ensures that the laundry facility is easily accessible to all residents, including those with disabilities, aligning with DM2's emphasis on inclusivity. Additionally, positioning the laundry next to a high-traffic area like the gym maximises the efficiency of these communal spaces, ensuring they are conveniently located for resident use. The conversion of the existing laundry space at level 7 into an additional studio increases the total number of student accommodations to 432. This change supports DM15 and DM1 of the Haringey Development Management Development Plan Document (2017) by providing an additional residential unit without compromising amenity spaces, thereby contributing positively to the overall functionality and quality of the building.

Amenity Space Provision

As a consequence of the layout modifications delineated above, the total area designated for amenity

space has been adjusted slightly to ensure a fully compliant scheme. Primarily, it should be noted that Haringey has no planning policy on amenity space or room sizes, setting out exact figures per room / student.

Amenity Type	Approved Area	Proposed Area	Difference	Area per Student (Approved)	Area per Student (Proposed)
Cluster Kitchens	1044m ²	944m ²	-100m ²	4.29m ²	4.16m ²
Internal Communal Amenity	416m ²	392m ²	-24m ²	0.96m ²	0.91m ²
External Communal Amenity	302m ²	312m ²	+10m ²	0.70m ²	0.72m ²
Total Amenity Space	1762m²	1648m²	-114m²		

The figures contained within the table are explained further within the Design and Access Statement.

This represents a slight overall reduction in internal amenity space, primarily due to various compliance requirements related to reconfiguring the core and maintaining retail unit areas.

Section 6.8.12 of the Committee Report for LPA ref. HGY/2021/2304 states that *"There would be 302sqm of external amenity space which would provide 0.7sqm per student. In summary, the proposals are considered to provide a high standard of student accommodation and amenity for occupants."* Thus, the increase to 312sqm is acceptable.

Furthermore, regarding internal amenity space, Section 6.8.10 of the Committee Report states that *"A large amount of both external and internal shared amenity space is still proposed for the student use within the building. Each cluster would have its own amenity space consisting of a kitchen and lounge area totalling 1,044sqm across the development."* It is noted that the approved amount of internal amenity space was considered "large" and thus a minor reduction of this by 100sqm to 944sqm should certainly not be considered unreasonable.

It is noteworthy that the Planning Sub Committee resolved to grant planning permission for a very similar development on 5th September 2022, contingent on the signing of a s106 agreement. According to Section 6.8.5 of the Committee Report for that version of the scheme: *"Each cluster would have its own amenity space consisting of a kitchen and lounge area totalling 1,098sqm across the development, averaging 4.0sqm of cluster amenity space per room of accommodation."* Thus, 4.0sqm of internal

amenity space per room was deemed acceptable. The proposed amendments under this NMA application offer 4.16sqm per room. While this is a reduction from the approved scheme's 4.29sqm per room, it is still significantly higher than the 4.0sqm per room that was considered acceptable in the previous version of the scheme, which was recommended for approval.

Summary

The proposed amendments to the development plan have been carefully crafted to comply with the relevant policies and standards while ensuring high-quality, accessible, and functional student accommodation. The reconfiguration of accessible bedrooms aligns with Policy DM15 and London Plan policies D5 and E10 Part H, ensuring 15% of the rooms meet the accessibility requirements as stipulated by BS8300-2:2018. This redesign enhances inclusivity and maintains the functionality of living spaces without compromising room numbers.

The adjustments to the basement plan comply with Policy DM18 and London Plan Policy SI3, addressing structural and energy efficiency needs through the inclusion of a District Heating Network (DHN) Sub-Station and ensuring robust structural solutions with minimal impact on surrounding buildings. The revised cycle parking provision exceeds the minimum requirements, promoting sustainable transportation.

The reconfiguration of cores and the ground floor layout improves fire safety compliance, addressing concerns highlighted by the fire engineer. The separation of residential and retail exits and the incorporation of adequate smoke ventilation align with Policy D12 and Haringey Policy SP6, enhancing the safety and functionality of the building.

The temporary solution of using Air Source Heat Pumps (ASHP) aligns with Policy SI2 and Policy DM21, providing a sustainable heating option if DHN connection is delayed. The strategic placement and screening of ASHP units ensure minimal visual impact, maintaining the building's aesthetic appeal.

The relocation of the laundry to the first floor and the conversion of the existing laundry space into an additional studio increase the total number of student accommodations to 432. This change supports DM15 and DM1, enhancing accessibility and functionality without compromising amenity spaces.

The slight reduction in internal amenity space, necessitated by compliance requirements, still meets the standards set out in previous approvals. The overall provision of amenity space remains high, ensuring a high standard of living for the students.

Overall, the proposed amendments are consistent with the relevant planning policies, ensuring that the development remains inclusive, sustainable, and compliant while maintaining high standards of design and functionality.

Contents of Application

The following supporting documents have been submitted via the Planning Portal in support of the application:

- The relevant planning application fee;
- The completed application form;
- This covering letter prepared by ROK Planning;
- Design and Access Statement prepared by HCD Architects;
- Fire Statement approved under LPA ref. HGY/2021/2304 prepared by AECOM;
- Fire Letter prepared by Ashton Fire;
- Architectural drawings prepared by HCD Architects:
 - Ground Floor Plan (Drawing No. 23192-HCD-AZ-00-DR-PL0400_P01);
 - Basement Floor Plan (Drawing No. 23192-HCD-AZ-0B-DR-PL040B_P01);
 - First Floor Plan (Drawing No. 23192-HCD-AZ-01-DR-PL0401_P01);
 - Second Floor Plan (Drawing No. 23192-HCD-AZ-02-DR-PL0402_P01);
 - Seventh Floor Plan (Drawing No. 23192-HCD-AZ-07-DR-PL0407_P01);
 - Eighth Floor Plan (Drawing No. 23192-HCD-AZ-08-DR-PL0408_P01);
 - Twenty Fourth Floor Plan (Drawing No. 23192-HCD-AZ-24-DR-PL0424_P01);
 - Roof Plan (Drawing No. 23192-HCD-AZ-25-DR-PL0425_P01);
 - North-East and North-West Elevations (Drawing No. 23192-HCD-AZ-ZZ-DR-PL0500_P01);
 - South-East and South-West Elevations (Drawing No. 23192-HCD-AZ-ZZ-DR-PL0501_P01);
 - Courtyard Elevations – Sheet 1 (Drawing No. 23192-HCD-AZ-ZZ-DR-PL0502_P01);
 - Courtyard Elevations – Sheet 2 (Drawing No. 23192-HCD-AZ-ZZ-DR-PL0503_P01);
 - Sections 1 & 2 (Drawing No. 23192-HCD-AZ-ZZ-DR-PL0600_P01);
 - Sections 3 & 4 (Drawing No. 23192-HCD-AZ-ZZ-DR-PL0601_P01); and
 - Bay Study 1 (Drawing No. 23192-HCD-ZZ-00-DR-PL2000_P01).

I trust that you have all the information you require to validate this application. If, in the interim, you have any queries please do not hesitate to contact either Aidan Payne (aidan.payne@rokplanning.co.uk) or myself at this office. I look forward to your formal acknowledgement of the application.

Yours sincerely,



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