

Planning Sub Committee

REPORT FOR CONSIDERATION AT PLANNING SUB-COMMITTEE

1. APPLICATION DETAILS

Application: HGY/2017/3584

Ward: Tottenham Green

Address: Land at Bernard Works, Bernard Road, Herbert Road and Norman Road
Bernard Road Tottenham London N15 4NX

Demolition of existing buildings and erection of a part 1,3, 4,5,6,7 storey mixed use development comprising 25 Commercial Units (B1), music rehearsal space (Sui Generis), a café (A3), Commercial Pavilion (Sui Generis) (2446.9sqm), and 99 Residential Units (C3) including 12 apartments tethered to the commercial space, plus site access, landscaping, plant and other associated development.

Applicant: Empyrean Developments Ltd

Agent: Urbanissta

Ownership: Private and Council

Case Officer Contact: James Hughes

Site Visit Date: 5th January 2017

Date received: 11th December 2017

Plans and Drawing Numbers: A244-DMA-ZZ-ZZZ-DR-A-01100; A244-DMA-ZZ-ZZZ-DR-A-00101; A244-DMA-ZZ-ZZZ-DR-A-00102; A244-DMA-ZZ-ZZZ-DR-A-00201; A244-DMA-ZZ-ZZZ-DR-A-00202; A244-DMA-ZZ-ZZZ-DR-A-01101; A244-DMA-ZZ-ZZZ-DR-A-01102; A244-DMA-ZZ-ZZZ-DR-A-01103; A244-DMA-ZZ-ZZZ-DR-A-01104; A244-DMA-ZZ-ZZZ-DR-A-01104; A244-DMA-ZZ-ZZZ-DR-A-01104; A244-DMA-ZZ-ZZZ-DR-A-01105; A244-DMA-ZZ-ZZZ-DR-A-01106; A244-DMA-ZZ-ZZZ-DR-A-01107; A244-DMA-ZZ-ZZZ-DR-A-01108; A244-DMA-ZZ-ZZZ-DR-A-01109; A244-DMA-ZZ-ZZZ-DR-A-01201; A244-DMA-ZZ-ZZZ-DR-A-01202; A244-DMA-ZZ-ZZZ-DR-A-01203; A244-DMA-ZZ-ZZZ-DR-A-01204; A244-DMA-ZZ-ZZZ-DR-A-01205; A244-DMA-ZZ-ZZZ-DR-A-01206; A244-DMA-ZZ-ZZZ-DR-A-01207; A244-DMA-ZZ-ZZZ-DR-A-01208; A244-DMA-ZZ-ZZZ-DR-A-01301; A244-DMA-ZZ-ZZZ-DR-A-01302; A244-DMA-ZZ-ZZZ-DR-A-01303; A244-DMA-ZZ-ZZZ-DR-A-01304; A244-DMA-ZZ-ZZZ-DR-A-01305; A244-DMA-ZZ-ZZZ-DR-A-01306; A244-DMA-ZZ-ZZZ-DR-A-01401; A244-DMA-ZZ-ZZZ-DR-A-01402; A244-DMA-ZZ-ZZZ-DR-A-01403; A244-10.06-01-Area & Accommodation Schedule; A244-10.06-02-Residential Unit Schedule; A244-10.06-03-Commercial Unit Schedule

Approved Documents: Planning Statement (December 2017 Urbanissta); Home Quality Mark Assessment (December 2017 - Renewable Environmental Services); Breeam Assessment (December 2017 - Renewable Environmental Services); Tree Survey & Arboricultural Impact Assessment (October 2017 - Syntegra Consulting); Statement of Community Involvement (October 2017 – Hard Hat); Daylight/Sunlight Analysis (December 2008 – Gia); Internal Daylight/Sunlight Analysis (December 2008 – Gia); Air Quality Assessment (December 2017 - xC02); Phase I Land Contamination Study (April 2017 – Soils Limited); Basement Impact Assessment (September 2017 – Soils Limited); Environmental Noise Survey Report (October 2017 - Sandy Brown Acoustic); Planning Noise Report (November 2017 - Sandy Brown Acoustic); Outline Fire Safety Strategy Report (December 2017 – Chapman BDSP); Economic Statement (December 2017 – Empyrean Developments); Energy Strategy (December 2017 - Renewable Environmental Services); Thermal Comfort Analysis (December 2017 - Renewable Environmental Services); Future Climate (TM49) Analysis (December 2017 - Renewable Environmental Services); Wind Comfort Study (December 2017 – Chapman BDSP); Viability Report and appendices 1-4 (December 2017 – Adam Roberts); Construction Management Plan (December 2017 – Haig); Demolition Plan (December 2017 – Haig); Transport Assessment (December 2017 - Steer Davies Gleave); Design and Access Statement (December 2017 -Duggan Morris Architects); D&A Landscape Character and associated plans (December 2017 – MRG Studio); Utilities Statement (December 2017 – Long and Partners); Ventilation Services Strategy (December 2017 – Long and Partners).

- 1.1 This application is before the Planning Sub-Committee because it is major development and is required to be reported under the Council’s Constitution.

SUMMARY OF KEY REASONS FOR RECOMMENDATION

- This proposal is very well designed and has been formulated with the needs of the end user in mind and offers an innovative approach to employment led redevelopment which officers consider offers a model approach for future schemes.
- The proposed development is in line with the strategic site allocation requirements (TH12 - Herbert Road) and is judged to be a catalyst that will encourage and retain small scale creative enterprises in the area.
- The applicant has followed a master planned approach. The proposal is considered to meet the policy criteria for redevelopment within a Local Employment Area (Regeneration Area). The development maximises employment floorspace and delivers 25 units of commercial floorspace of

varying sizes and layouts. The scheme will make a contribution of 99 homes for which there is a substantial and pressing need in the locality

- The scheme provides 12 units of affordable tethered housing that will protect and incentivise artists and creative businesses to invest in Tottenham in the long term, even as rents may rise.
- The principle of the re-location of the open space within the site is acceptable. Redevelopment will result in the loss of 10 trees (including 2 provisionally protected trees). However, these losses are offset by a comprehensive site-wide tree re-planting program (with street trees provided along Ashby Road and Herbert Road) together with landscaping treatment that will provide a high quality park. The re-configuration will provide a 33% increase in open space and improved pedestrian circulation and access.
- The development's physical design embodies many of the key objectives of Creative Enterprise Zones (CEZs). The incorporation of meeting and social spaces within the scheme will encourage creative relationships between artists, creative businesses, their clients, and local communities.
- The density is compliant with the London Plan Density Matrix. The design of the scheme is credible and well considered. The mixed use development will allow creative production while still being well managed and protecting local amenity.
- The layout and access to the site is logical and the strategic site requirements around retained pedestrian access are met. The applicant has met policy requirements around the provision of taller buildings and the massing and scale of the scheme responds positively to the context of the area. Haringey's Quality Review Panel supports the design of the scheme.
- The new residential units will provide high quality residential units and will not have significant impact on neighbouring occupiers. The transport impacts of the development are considered to be acceptable.

2.0 RECOMMENDATION

- 2.1 That the Committee resolve to GRANT planning permission and that the Head of Development Management or the Assistant Director Planning is authorised to issue the planning permission and impose conditions and informatives subject to referral to the signing of a section 106 Legal Agreement providing for the obligations set out in the Heads of Terms below.
- 2.2 That delegated authority be granted to the Head of Development Management or the Assistant Director of Planning to make any alterations, additions or deletions to the recommended heads of terms and/or recommended conditions as set out in this report and to further delegate this power provided this authority shall be exercised in consultation with the Chair (or in their absence the Vice-Chair) of the Sub-Committee.
- 2.3 That the section 106 legal agreement referred to in resolution (2.1) above is to be completed no later than 1st July 2018 or within such extended time as the Head of Development Management or the Assistant Director Planning shall in her/his sole discretion allow; and
- 2.4 That, following completion of the agreement(s) referred to in resolution (2.1) within the time period provided for in resolution (2.3) above, planning permission is granted in accordance with the Planning Application subject to the attachment of the conditions.

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

- 1) Three Year Expiry (LBH Development Management)
- 2) Development in Accordance with Approved Drawings and Documents (LBH Development Management)
- 3) Materials Samples (LBH Development Management)
- 4) Hard and Soft Landscaping (LBH Development Management)
- 5) Landscaping – Replacement of Trees and Plants (LBH Development Management)
- 6) Lighting Strategy (LBH Development Management)
- 7) Secure by Design Certificate (Metropolitan Police Service)
- 8) Waste Management (LBH Development Management)
- 9) Car Parking Management Plan (LBH Transportation)
- 10) Updated Basement Development Impact Assessment (LBH Development Management)
- 11) Construction Management Plan (CMP) and Construction Logistics Plan (CLP) (LBH Transportation)
- 12) Service and Delivery Plan (DSP) (LBH Transportation)
- 13) Wheelchair Dwellings (LBH Development Management)

- 14) Accessible & Adaptable Dwellings (LBH Development Management)
- 15) Internal Noise Levels within Residential Units – Design (LBH Environmental Health – Noise)
- 16) Internal Noise Levels within Residential Units – Maximum Noise (LBH Environmental Health – Noise)
- 17) Plant Noise (LBH Environmental Health – Noise)
- 18) Commercial Music Studio Design (LBH Environmental Health – Noise)
- 19) Scheme of Sound Insulation (LBH Environmental Health – Noise)
- 20) Construction and Demolition Noise LBH Environmental Health – Noise)
- 21) Site Wide Energy Network (LBH Carbon Management)
- 22) Surface Water Drainage (Thames Water)
- 23) Public Sewer Crossings (Thames Water)
- 24) Piling Method Statement (Thames Water)
- 25) Existing Water Supply Impact study - (Thames Water)
- 26) Details of Flood Risk Attenuation Measures (LBH Drainage)
- 27) Drainage Details – (LBH Drainage)
- 28) Confirmation of Energy Standards (LBH Carbon Management)
- 29) Post Construction Certification BREEAM and Home Quality Mark (LBH Carbon Management) (LBH Carbon Management)
- 30) Remedial Works Plan BREEAM Very Good and Home Quality Mark (LBH Carbon Management)
- 31) Site Investigation (LBH Environmental Health)
- 32) Site Remediation (LBH Environmental Health)
- 33) Air Quality and Dust Management Plan (LBH Environmental Health)
- 34) Machinery Emissions (LBH Environmental Health)
- 35) NRMM Registration (LBH Environmental Health)
- 36) Machinery Inventory (LBH Environmental Health)
- 37) Updated Ecological Appraisal (LBH Development Management and Carbon Management)

Informatives Summary (The full text of Informatives is contained in **Appendix 1** to this report.)

- 1) Working with the Applicant (LBH Development Management)
- 2) Community Infrastructure Levy (LBH Development Management)
- 3) Hours of Construction Work (LBH Development Management)
- 4) Party Wall Act (LBH Development Management)
- 5) Numbering New Development (LBH Development Management)
- 6) Asbestos Survey Where Required (LBH Environmental Health)
- 7) Disposal of Commercial Waste (LBH Waste Management)
- 8) Piling Method Statement Contact Details (Thames Water)
- 9) Minimum Water Pressure (Thames Water)

- 10) Main Water Crossing (Thames Water)
- 11) Installation of Non-Return Valve (Thames Water)
- 12) Paid Garden Waste Collection Service (LBH Development Management)
- 13) Designing out Crime Officer Services (Metropolitan Police Service)

Section 106 Heads of Terms:

1) Affordable Workspace – 23,000m² of affordable workspace across 25 creative workspace studios to be let at 75% of market rent, subject to a rent review mechanism, for a period of 50 years.

- Provision of an affordable workspace provider to manage and support occupiers.
- Provision of an affordable workspace plan to include:
 - Delivery of commitments to the community in terms of training and/or employment opportunities and/or prioritising local residents and/or supporting community initiatives, providing upskilling opportunities and participating in studio open days
 - Management of the exhibition/pavilion space
 - Management of the café/refreshment space.
 - Management of noise/exhausts/cooling and impacts on residential neighbours
 - Management of use of the yard space and resulting noise
 - Management of communal space and parking.

2) Affordable Housing – 12 units of tethered rental accommodation (12% affordable housing by unit and habitable room - 8 x 1B1P and 4 x 2B3P) to be located on the first and second floors of the development.

- Residents to be Occupiers (and family members) of onsite commercial licence holder
- London Plan income restriction for occupiers (£90,000 maximum household income)
- 75% of market rent subject to rent review.

3) Viability Review Mechanism should the proposal not be implemented within 18 months of the date of decision.

4) Viability Review Mechanism at 75% leasehold sale completion.

- 5) **Public Space Access and Management Plan** – for new public space created
- Space to be open to the public at all times
 - Public space to be maintained by the applicant
- 6) **Car Capping** - No future occupiers will be entitled to apply for a residents or business parking permit under the terms of the relevant Traffic Management Order (TMO) controlling on-street parking in the vicinity of the development save for disabled residents.
- 7) **Parking Control Measures - £23,000** (twenty three thousand pounds) towards the consultation and implementation of parking control measure in the local area surrounding the site including amendments to relevant traffic management orders.
- 8) **Car Club** - Establishment or operation of a car club scheme, which includes the provision of 2 car club bays and two cars with, two years' free membership for all units and £50.00 (fifty pounds in credit) per year for the first 2 years.
- 9) **Residential Travel Plan** (as part of the detailed travel plan) comprising:
- a) Appointment of a travel plan coordinator
 - b) Provision of welcome induction packs containing public transport and cycling/walking information like available bus/rail/tube services, map and time-tables, to every new resident.
 - c) Travel Information packs to be given to all residents and information available through a website.
 - d) **£3,000** (three thousand pounds) for monitoring of the travel plan initiatives.
- 10) **Commercial Travel Plan** (as part of a detailed travel plan) comprising:
- a) Appointment of a travel plan co-coordinator
 - b) Provision of welcome induction packs for staff containing public transport and cycling/walking information like available bus/rail/tube services, map and time-tables to all staff, travel pack to be approved by the Councils transportation planning team.
 - c) **£3,000** (three thousand pounds) for monitoring
 - d) Review of cycle parking provision annually for the first two years as part of the travel plan and provide additional cycle parking facility if required.
- 11) **Energy Plan** and a developer financial contribution of **£382,305** addressing the **unachieved carbon reduction targets**. Subject to a review mechanism

if the energy efficiency can be improved. Further contribution in the event sustainability measures do not achieve carbon savings.

12) Considerate Constructor- Development to be constructed in accordance with Considerate Constructor's scheme.

13) S278 Works – Applicant obligated to enter into a S278 agreement for relevant highway works on adopted highways.

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

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

- i. In the absence of a legal agreement securing 1) an affordable workspace plan and 2) an affordable workspace provider, the scheme would fail to deliver high quality employment floorspace within a designated Employment Area – Regeneration Area and fail to meet the Council's strategic objectives in relation to employment land and the site allocation. As such, the proposal is contrary to London Plan Policy 4.4, Draft London Plan Policy E3, Strategic Policy SP8 and DM Policy 38 and TH12.*
- ii. In the absence of a legal agreement securing 1) the provision of on-site affordable housing and 2) viability review mechanisms the scheme would fail to foster mixed and balanced neighbourhoods where people choose to live, and which meet the housing aspirations of Haringey's residents. As such, the proposal is contrary to London Plan Policies 3.9, 3.11 and 3.12, Strategic Policy SP2, and DPD Policies DM 11 and DM 13, and Policy TH12.*
- iii. In the absence of the legal agreement securing an Open Space Management and Access Plan the proposal would fail to secure publicly accessible and well maintained open space. As such, the proposal would be contrary to London Plan policies 7.5, 7.9, Policy SP12, Policy DM20 and Policy TH12.*
- iv. In the absence of legal agreement securing 1) residential and commercial Travel Plans, and Traffic Management Order (TMO) amendments and 2) financial contributions toward travel plan monitoring, and car club provision and parking control measures the proposal would have an unacceptable impact on the safe operation of the highway network, and give rise to overspill parking impacts and unsustainable modes of travel. As such, the*

proposal would be contrary to London Plan policies 6.9, 6.11 and 6.13. Spatial Policy SP7, Policy DM31 and Policy TH12.

- v. *In the absence of a legal agreement securing an energy plan carbon offset payment and an energy plan the proposal would fail to mitigate the impacts of climate change. As such, the proposal would be unsustainable and contrary to London Plan Policy 5.2 and Strategic Policy SP4, and emerging DPD Policies DM 21, DM22 and SA48.*
- vi. *In the absence of a legal agreement securing the developer's participation in the Considerate Constructor Scheme, the development would fail to mitigate the impacts of demolition and construction and impinge the amenity of adjoining occupiers. As such the proposal would be contrary to London Plan Policies 5.3, 7.15, Policy SP11 and Policy DM1.*

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

- i. There has not been any material change in circumstances in the relevant planning considerations, and
- ii. The further application for planning permission is submitted to and approved by the Assistant Director within a period of not more than 12 months from the date of the said refusal, and
- iii. The relevant parties shall have previously entered into the agreement contemplated in resolution (1) above to secure the obligations specified therein.

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3. PROPOSED DEVELOPMENT AND LOCATION DETAILS

3.1. Proposed development

- 3.1.1. This is a full planning application for the demolition of existing buildings and the erection of a part 1/3/4/5/6/7 storey mixed use development comprising 25 commercial units (Use Class B1), music rehearsal space (Sui Generis), a café (A3), Commercial Pavilion (Sui Generis) (2446.9sqm), and 99 residential units (C3) including 12 affordable “tethered” units.
- 3.1.2. In design terms, the scheme is set out primarily in 4 blocks, generally fronting the perimeter roads around the site with an interior courtyard. The basement contains commercial units and a music rehearsal space. The ground floor contains an A3 café use and commercial units, with ground-oriented residential dwellings facing existing development along Ashby Road and Herbert Road.
- 3.1.3. An enclosed pavilion faces the interior courtyard at ground floor level. The remaining upper floors contains residential dwellings. The applicant proposes 40 one-bedroom units, 45 two-bedroom units and 13 three-bedroom units. The heights of proposed building increase across the site terminating with the highest structures of 7 storeys in the southeast corner of the site. A new

publicly accessible park is proposed along the southern boundary of the site to replace the existing greenspace at the north of the site. The proposed greenspace is will have seating as well as open lawn and an east-west pedestrian connection.

- 3.1.4. The proposal involves rationalising the existing dual road layout running in parallel north to south and removing part of Herbert Road while retaining the pedestrian link with Ashby Road and access for emergency and refuse vehicles.
- 3.1.5. The scheme proposes 18 car parking spaces, all on street. 10 Blue Badge accessible car parking space will be provided along Ashby Road and 3 standard car parking bays along Herbert Road with 3 spaces removed along Ashby Road. Any existing local residential that is a Blue Badge Holder may use the disabled spaces created. All created parking spaces will be added the CPZ, to be secured by S106 agreement.
- 3.1.6. The existing pedestrian passage at the western edge of the site connecting Bernard Road and Norman Road will be open to vehicles. The new carriageway will contain 5 commercial car parking bays, primarily serving the commercial element of the development. 183 cycle parking spaces are proposed.
- 3.1.7. The scheme seeks to build upon Tottenham's emerging creative culture by providing affordable workspaces together with market and affordable housing. The developer intends to secure an affordable workspace provider to curate and select commercial occupiers that will contribute to a creative and varied community that will establish itself in Haringey and integrate with the wider area in the long term. The development is designed to foster a 'maker' community that can be retained even if rents in the surround area increase.
- 3.1.8. The development proposes 12% affordable housing. The scheme incorporates an affordable 'tethered housing' product that will be offered to eligible commercial occupiers (with their families) at a 75% discount of prevailing market rents. The occupier must be a licence holder of a commercial space so the housing is linked to the occupation of a commercial space but physically separate.

3.2. **Site and Surroundings**

- 3.2.1. The site is approximately 0.71 hectares in area and roughly rectangular. The site primarily contains industrial units, internal access roads and an area of undesignated green space in the north-east corner of the site that is 650m². The site is located to the south of Herbert Road, north of Bernard Road, west of Ashley Road, and east of Norman Road.

3.2.2. The site is surrounded by a mixture of existing commercial development along Norman Road and Bernard Road to the south and west. 2 storey residential terraces are located to the north on Herbert Road and along Ashby Road to the east. An unconventional road layout runs along the eastern boundary of the site, with Herbert Road running parallel to Ashby Road, separated by a 2-metre-high brick wall. The remainder of the site contains surface car parking serving the industrial units.

3.2.3. The site lies within a designated Local Employment Area – Regeneration Area (Rangemoor/ Herbert Roads) and within the Tottenham Hale Growth Area. Part of the site (excluding the open space in the northeast corner) is allocated in the Tottenham Area Action Plan (TH12 Hebert Road). The site allocation indicates the site is suitable for mixed used employment-led redevelopment. The site is within the Upper Lea Valley Opportunity Area.

3.2.4. The South Tottenham area has been identified by the Greater London Authority (GLA) as a potential Creative Enterprise Zone (CEZ), due to its expanding cluster of creative industries who provide jobs and give character and identity to the area. It is an increasingly attractive choice for artists, creators and makers.

3.1.1. The Seven Sisters/Page Green Conservation area lies to the northeast. The site does not contain any listed or locally listed buildings. Earlsmead Primary School, a prominent landmark within the Conservation Area lies to the north of the site.

3.1.2. The site has a PTAL Rating of 6a with excellent access to Seven Sisters Underground and Overground Station and may benefit from future access to Crossrail 2. The site lies within the Seven Sisters Controlled Parking Zone (CPZ).

3.2. **Relevant Planning and Enforcement history**

3.2.1. There are no planning applications for this site that are of direct relevance to the current proposal. The site and surroundings have extensive planning history for minor alterations to the existing commercial buildings.

3.3. **Applicant's Consultation**

3.3.1. The applicant has undertaken pre-application public consultation prior to the submission of the application, and has sought pre-application guidance from the Council.

3.3.2. The applicant has submitted a Statement of Community Involvement prepared by Hard Hat dated October 2017. The applicant also undertook non-statutory public exhibitions and community consultation events on 18th May 2017 and 4th October 2017.

3.4. Quality Review Panel

- 3.4.1. The scheme has been presented to Haringey's Quality Review Panel on three occasions at the pre-application stage, the first being a full review and the subsequent two meetings via the Chair's review process. A summary of the most recent QRP Chair's Review (on 8 March 2017) is set out in the design section below. The Panel and the Chair have offered their broad support for the scheme.

3.5. Development Management Forum

- 3.5.1. The proposal was presented to a Development Management Forum on 4th July 2017. Concerns were raised with the proposal to consolidate the road layout and the effect on traffic levels on Ashby Road on Herbert Road. The relocation of the park was critiqued, and concerns were raised with the height of the buildings and impact on neighbouring amenity. The notes from the Forum are set out in Appendix 5.

4. CONSULTATION RESPONSE

- 4.1. The following were consulted regarding the application:

Internal

- LBH Head of Carbon Management
- LBH Design Officer
- LBH Housing
- LBH Tree Officer
- LBH Economic Development
- LBH Regeneration
- LBH Cleansing
- LBH Parks
- LBH EHS - Pollution Air Quality Contaminated Land
- LBH Policy
- LBH Conservation Officer
- LBH Property Services
- LBH Emergency Planning and Business Continuity
- LBH Drainage
- LBH Transportation Group
- LBH EHS - Noise EHS

External

- London Fire Brigade
- Designing Out Crime Officer
- Transport For London
- Environment Agency
- National Grid
- Thames Water Utilities
- Page Green Residents Association
- Tottenham Conservation Area Advisory Committee

- 4.2. The full text of comments from internal and external consultees that responded to consultation is contained in Appendix 1. A summary of the consultation responses received is provided below:

Internal:

LBH Conservation Officer

No objection to development proposal. The development would not have an impact on the Page Green/Seven Sisters Conservation area or the listed Old Bank or Markfield Beam Engine. The proposal is of high quality and has been sensitively designed to transition between the terraced streetscape and taller elements. Proposal would enhance the townscape of this part of Tottenham and would enhance the setting of the heritage assets within the wider area.

LBH Waste Management

No objection to proposal. The above planning application has been given a RAG traffic light status of GREEN for waste storage and collection. Standard Conditions and informatives required.

LBH Transportation

No objection to proposal, subject to including Conditions and contributions via S106 agreement.

LBH Environmental Health

No objection to the proposal subject to standard conditions.

LBH Environmental Health Noise

No objection to proposal. EHO Has considered Environmental Noise Survey Report and Planning Noise Report. Conditions recommended including noise insulation scheme.

LBH Tree Officer

No objection to proposal. The proposed new development at the Bernard works site will result in the loss of the existing open space on Herbert Road and all of the 12 trees currently present. The majority of these trees are either in a poor condition or are of low quality and value and should not be an impediment to development. Two trees (T1: Lime and T8: Norway maple) are of moderate quality and value. They have been assessed for a TPO and meet the criteria.

The loss of T1 and T8 would be mitigated by the planting of new trees in and around the new development. The New Tree and Specimen Shrub Plan (Drawing SP00) shows the location of over 50 new trees in highway locations and within a new public space. It includes 9 new trees in Herbert Road, 7 of which would be in front of the proposed new homes.

There are also 25 additional specimen shrubs to be planted in residential gardens. The proposed new trees are appropriate for such a scheme and include a mixture of different species in various sizes. Many of the new trees are native species, which will greatly increase local biodiversity. The number and variety of new trees will help to mitigate the loss of the existing trees, improve screening of the site and local air quality, while also enhancing the quality of life for existing and future residents and visitors to the area. Construction Phase conditions not required.

LBH Local Lead Flood Authority

No objection to proposal. LLFA reviewed the information that was supplied and held several meetings with drainage consultants and worked through pre-app issues. Overall, the drainage strategy that is proposed is acceptable and can be approved subject to condition.

LBH Carbon Management

No objection to proposal subject to energy plan with Carbon Offset. Proposed measures, alongside the site wide energy network, makes the scheme policy compliant and should be secured with an updated energy plan and carbon offset payment through conditions and legal agreement.

LBH Tottenham Regeneration Team

No objection to proposal. The proposed development will see a workspace-led, mixed use scheme come forward, providing much needed affordable workspace for local entrepreneurs, start-ups and creative industries.

External:

Thames Water

No objection to development proposal. Existing water supply infrastructure has insufficient capacity to meet the additional demands for the proposed development. Condition to secure infrastructure study required. No objection with regard to sewerage infrastructure capacity. Standard conditions and informatives to be imposed.

Metropolitan Police – Designing Out Crime Officer (DOCO)

No objection to proposed development subject to conditions. Consultation was held with the architect in Sept 2017 and issues with the development were highlighted in regards to antisocial behaviour and crime. Applicant explained their vision to enhance the area through architectural design and agreed to participate in the SbD scheme. Conditions recommended.

Transport for London

As the site is not on or is not in close proximity to the Transport for London Road Network or the Strategic Road Network, TfL has no comments to make on the application.

Environment Agency

No objections to the proposals but Environment Agency encloses advice around land contamination and ground water infiltration.

5.0 LOCAL REPRESENTATIONS

5.1 The following were consulted:

- 471 Neighbouring properties consulted by letter
- 1 Resident's Association consulted by letter
- 6 planning site notices were erected in the vicinity of the site.

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

- No of individual responses: 59

- Objecting: 55
- Supporting: 4
- Petitions: 2 (5 Signatories – with Objections; 78 Signatories with 78 Objections)
- Others: 1 – Response from Joanne McCartney – London Assembly Member Haringey and Enfield (Objection on behalf of local residents)

Summary of Assembly Member (AM) Objections

Lack of Affordable Housing; Scale and privacy impacts; Concerns regarding the re-location of the greenspace, traffic and parking and delivery impacts.

- 5.3 The issues raised in representations that are material to the determination of the application are summarised as follows:

Principle of Development

- The number of units proposed exceeds the strategic allocation in the Tottenham Area Action Plan
- The scheme will result in the loss of existing jobs on the site

Development Design

- The height and bulk of the new build blocks are out of keeping with existing area.
- The density of the scheme is excessive and will set a precedent
- The pavilion will result in noise, disturbance and anti-social behaviour
- The relocation of the green space will result in the loss of trees and a well used community space.
- Future residential occupiers will be impacted by adjoining commercial users

Local Amenity

- The scheme will give rise to daylight/sunlight and privacy impacts to adjoining properties
- The proposal will result in additional air pollution in the local area.
- There is insufficient waste collection and servicing proposed, which will lead to local fly tipping.
- The music studio will give rise to vibrational impacts
- Basement development may give rise to subsistence

Transport

- The proposal lacks sufficient parking and will add to parking pressure in the local area
- The servicing plans will lead to congestion
- Permit Free development will be insufficient to prevent parking on local roads (after CPZ hours)
- Air quality concerns arising from additional vehicle movements.

- Changes to the road layouts will cause congestion and lead to highway safety issues.
- The current dual road layout is suitable and should be retained to protect the area from traffic impacts.

Other matters

- Pressure on local services including health services, public transport and the Earlsmead School.
- The Community Infrastructure Levy payment will be insufficient to address the impacts of the proposal
- The developer should not pay an offset carbon levy, and should make the development sustainable instead.

Support

- The provision of affordable workspace will meet with local demand and encourage the retention of small businesses in the area – maybe start ups are seeking the type of space on offer.
- Development will strengthen the creative community in the area that has emerged in recent years.
- There is a need for sub-market affordable workspace all over London.
- Provision of tethered housing will support lower income residents that may wish to start small businesses.

5.4 The following issues raised are not material planning considerations:

- The re-located green space will be partly ‘privatised’ (Officer comment: provided the re-located green space is fully accessible to the public, its ownership is not a material planning consideration.)
- The market units will be too expensive for Haringey residents. (Officer comment: the post planning sale price of individual market units is not a planning matter.)
- It is not appropriate for the Council to sell its land to the development industry (Officer comment: the sale of the land is not material to planning)

6.0 MATERIAL PLANNING CONSIDERATIONS

6.1 Principle of the Development

- 6.1.1 The NPPF establishes overarching principles of the planning system, including the requirement of the system to “drive and support development” through the local development plan process and supports “approving development

proposals that accord with the development plan without delay”. The NPPF also expresses a “presumption in favour of sustainable development which should be seen as a golden thread running through both plan-making and decision-taking.”

The Development Plan

- 6.1.2 For the purposes of S38(6) of the Planning and Compulsory Purchase Act 2004 the Development Plan includes the London Plan (2016), the draft London Plan; Haringey’s Local Plan: Strategic Policies (2013 with alterations 2017); Development Management DPD (2017); Site Allocations (2017); and Tottenham Area Action Plan (2017).

The London Plan

- 6.1.3 The London Plan is the overall strategic plan for London, setting out an integrated economic, environmental, transport and social framework for the development of London over the next 20–25 years. The consolidated London Plan (2016) sets a number of objectives for development through various policies. The policies in the London Plan are accompanied by a suite of Supplementary Planning Guidance (SPGs) that provide further guidance.

- 6.1.4 The draft London Plan carries limited weight given its progression in the plan making process, but is a material planning consideration. The draft London Plan sets an annualised target for Haringey of 1,958 homes, and 10-year target of 19,580 homes.

Haringey Local Plan Strategic Policies (2013)

- 6.1.5 Haringey’s Local Plan Strategic Policies document sets out that the Council will secure a strong economy in Haringey through the reconfiguration and re-use of surplus employment designated land in B2 and B8 Use Classes, and the intensification of the use of existing employment sites (where possible), the provision of B1a/b floorspace as part of mixed-use development on suitable sites. New development shall protect and improve Haringey’s parks and open spaces. Secure improvements, enhancement and management in both quality and access to existing green spaces.

Tottenham Area Action Plan (AAP)

- 6.1.6 The document provides site specific and area based policy to underpin the delivery of the spatial vision set out in the adopted alterations to the Strategic

Polices DPD and the DPDs that sit alongside the Tottenham AAP to articulate the spatial vision for growth. The site allocation (TH12 – Herbert Road) envisages the creation of an employment-led mixed-use development west of the town centre and south, of the district centre. The allocation Site Requirements and Development Guidelines are below.

Site Requirements

- The site is within a Designated Employment Area – Regeneration Area and proposals for mixed-use employment-led development will be supported, where appropriate, to create a mix of uses through the re-introduction of creative employment uses.
- The quantum of dedicated employment floorspace on the site should be maximised through any development. Residential uses will be permitted to optimise the delivery of new employment stock, and should be located adjacent to the existing residential uses adjoining the site.
- Proposals should make provision for an element of affordable workspace in line with Policy DM38.

Development Guidelines

- Rationalisation of the “parallel access roads” on Ashby/Bernard/Herbert Roads.
- Reintroducing employment-generating uses is the key aim of this policy.
- Improved streetscape with the existing homes on Ashby Road is required.
- This site is identified as being in an area with potential for being part of a Decentralised Energy (DE) network. Development proposals should be designed for connection to a DE network, and seek to prioritise/secure connection to existing or planned future DE networks, in line with Policy DM22.
- Studies should be undertaken to understand what potential contamination there is on this site prior to any development taking place. Mitigation of and improvement to local air quality and noise pollution should be made on this site.
- Pedestrian access from the site to Page Green Road should be retained

Creative Enterprise Zone

6.1.7 London’s competitive land market means that the creative sector is struggling to find sufficient venues to grow and thrive, and is losing essential spaces and

venues for cultural production. Creative Enterprise Zones (CEZ) are a GLA initiative to designate small areas of London where artists and creative businesses can put down roots and establish themselves in local areas where creative activity is supported.

6.1.8 The role of creative communities in revitalising areas is key, but often these communities are the displaced from the neighbourhoods they have helped regenerate, with neighbourhood changes resulting in rising rents, increased property prices and the decline of affordable workspace. London predicted to lose 30 per cent of affordable creative workspace by 2019.

6.1.9 CEZs seek to retain and attract artists and new creative businesses to an area by offering incentives including permanent affordable workspaces. There are already significant creative clusters in Tottenham including within the South Tottenham Employment Area, Gourley Triangle, and Tottenham Green.

6.1.10 Research by the GLA indicates the economic impacts of Creative Enterprise Zones would support wider growth in Haringey. For Tottenham, CEZ related activity is projected to create an estimated 300 new creative jobs each year, and generate GVA growth of £26m.

6.1.11 This is reflected the in the draft London Plan Policy E8 which states that employment opportunities for Londoners across a diverse range of sectors should be promoted and supported along with support for the development of business growth and sector-specific opportunities. The evolution of London's diverse sectors should be supported, ensuring the availability of suitable workspaces including start-up, incubation and accelerator space for micro, small and medium-sized enterprises affordable workspace in defined circumstances.

6.2 Principle of Development – Assessment

Principle of Demolition

6.2.1 The scheme proposes demolition of the existing buildings on the land. The existing buildings on the site are of limited architectural value and are not locally or statutorily listed. The demolition of the existing buildings is acceptable in principle.

Principle of Master Planned Development

6.2.2 While the application redline area does exclude areas within allocated site TH12 (including the building on the south side of Bernard Road) and includes areas that are outside TH12 (including the open space north of allocated area) the applicant has demonstrated a master planned approach to the development. The scheme will address the wider area in terms of connectivity and layout as set out in detail below. The applicant's proposal has demonstrated that it will not impede the development of other allocated land within the strategic allocation and granting planning permission would not prejudice the Council's wider strategic planning objectives for the area.

6.2.3 The development is also considered to be a catalyst that will allow retention of small scale creative enterprises in the area while providing additional residential development, in line with the site allocation and other planning objectives. The scheme is therefore considered to incentivise the delivery of remaining land. The applicant has followed a master planned approach that is acceptable in principle.

Redevelopment within a Local Employment Area – Regeneration Area

6.2.5 The London Plan and Haringey's Strategic Policies require that more intensive land uses are directed to highly accessible locations. Local Plan Policy SP8 indicates there is a presumption to support local employment and small sized businesses that require employment land and space. Draft London Plan Policy E3 – Affordable Work Space notes that in defined circumstances, planning obligations may be used to secure affordable workspace at rents maintained below the market rate for that space for a specific social, cultural or economic development purpose.

6.2.6 Policy DM38 indicates support for mixed use, employment-led development within a Local Employment Area – Regeneration Areas (LEA-RA) where this is necessary to facilitate the renewal and regeneration (including intensification) of existing employment land and floorspace. DM38 sets a number of criteria for redevelopment within LEA-RA's which are considered below.

Redevelopment will give rise to the loss of 2,019.1m² of existing B8 floorspace, however the proposal will result in the following provision of employment generating floorspace:

- 1,1173. m² B1
- 85.8m² A3

- 705m² Sui Generis

6.2.7 The proposal will therefore yield 1908.1m² of employment floorspace. While this quantum represents a small loss in floorspace, the intensity of employment use will be considerably increased. The number of jobs on the site will increase from approximately 60 to 80, and the provision will improve quality by providing a flexible range of commercial unit sizes designed to meet the needs of the creative sector in line with the aims of the Creative Enterprise Zone and the site allocation.

6.2.8 As per the viability review by BNPP Paribas, the applicant is considered to have maximised the amount of employment floorspace in line with Policy DM38. The development proposal is judged to improve the site's suitability for employment uses and the intensity of employment use. The site secures sub-market commercial space and tethered residential units to be secured by a S106 agreement. The applicant has committed to securing a workspace provider with a long-term commitment to maintaining the agreed social, cultural and economic planning objectives, as per the Heads of Terms at the head of this report.

6.2.9 The proposal is therefore considered to meet the criteria set out in Policy DM38(a-f) for redevelopment within a LEA-RA. The provision of affordable workspace is in accordance with draft London Plan Policy E3 – Affordable Work Space and the objectives of the CEZ to secure affordable workspace for creative users. This proposal has been formulated with the needs of the end user in mind and offers an innovative approach to employment led redevelopment which officers consider offers a model approach for future schemes. The Redevelopment within a Local Employment Area – Regeneration Area acceptable is therefore acceptable in principle.

Principle of Housing Provision

6.2.10 London Plan Policy 3.3 provides explicit strategic support for the provision of housing within London, and sets a target for the Council to deliver a minimum of 15,019 homes in the Plan period 2015-2025. This target is set to increase with the adoption of the draft London Plan. Draft London Plan Policy H1 sets a target of 19,580 net completions of homes in the draft Plan period of 2019/20-2028/29. This yields an annualised target for Haringey of 1,958 homes.

6.2.11 Given the site's context within the Upper Lee Valley Opportunity Area and in light of the Council's local policy designations, the principle of the

redevelopment for of this site for mixed use including 99 new homes is supported and in line with both London Plan and local planning policy. The AAP site allocation TH12 sets out that residential will be permitted to cross subsidise new employment stock, and should be located adjacent to the existing residential uses adjoining the site.

6.2.12 The issue of affordable housing is addressed in the section below. The provision of housing is acceptable in principle.

Principle of the Re-location of Open Space

6.2.13 The enhancement of Haringey's open spaces is supported in line with Policy SP13. With regard to principle of the re-configuration of open space within the site (from the northeast corner of the site to the south) Policy DM20 sets out that the reconfiguration of open space will be supported where:

- a) It is part of a comprehensive, deliverable scheme;
- b) There would be no net loss of open space;
- c) It would achieve enhancements to address identified deficiencies in the capacity, quality and accessibility of open space, and it would secure a viable future for the open space; and
- d) It would not be detrimental to any environmental function performed by the existing open space.

6.2.14 The re-location is part of a comprehensive redevelopment and there would be an increase of open space from 650m² to 1,000m².) The quality of the green space is considered to be improved as it will be more usable and functional with seating and a designed layout, a better aspect, facing south and surrounded by active uses. An access obligation will be secured in the S106 agreement to ensure 24 hour access to the space for members of the public. The re-location would not be detrimental to any environmental function as the existing open space has been demonstrated to be of low ecological value and the proposal would increase the level of greenspace on the site.

6.2.15 While the re-location of the green space will result in the loss of several trees (including two which have provisional TPOs), the wider tree planting proposal for the site will compensate for the loss, as per the assessment below. The re-location of the open space within the site would comply with Policy DM20 and is acceptable in principle.

Principle of Development – Summary

6.2.16 The proposed development is in line with site allocation requirements and judged to be a catalyst that will allow the retention of small scale creative enterprises in the area. The applicant has followed a master planned approach. The proposal is considered to meet the policy criteria set for redevelopment within a Local Employment Area (Regeneration Area) and the scheme will make a contribution of 99 homes for which there is a need in the locality. This proposal has been formulated with the needs of the end user in mind and offers an innovative approach to employment led redevelopment which officers consider offers a model approach for future schemes. The principle of the re-location of open space within the site is acceptable. The existing buildings on the site are of no architectural value and their demolition is acceptable. The development proposal is acceptable in principle.

6.3 Affordable Housing

6.3.1 Local Plan Policy SP2 and DM Policy 13 require developments of more than 10 units to contribute to the Borough's target of 40% of affordable housing. However, Policy DM13 also indicates that the quantum of affordable housing delivery should have regard to both individual site circumstances and other planning benefits that may be achieved.

6.3.2 The draft London Plan notes the desirability of maintaining affordable workspace at rents below the market rate for specific social, cultural, or economic development purposes. The draft plan also set outs that sub-market works space may support educational as well as development outcomes. This accords with the site allocation that primarily focuses on the reintroduction of employment-generating uses as the key aim of the site, noting residential development will be permitted to optimise the delivery of new employment stock. As such in this circumstance the priority is the replacement of improved well designed employment floorspace and the residential development is essentially enabling development for this replacement. In this instance the provision of affordable workspace is a priority.

6.3.3 The Creative Enterprise Zone prospectus notes that London's new Housing Strategy draft supports live-work spaces for small businesses and entrepreneurs, in particular in Creative Enterprise Zones.

Tethered Housing

- 6.3.4 The delivery of affordable workspaces is coupled with the provision of 12 units of affordable 'tethered' housing. Tethered housing is intended for commercial occupiers to live affordably on site. The 12 affordable units will be within the Bernard Works development but are not physically connected or joined to any workspace. The tethered units are not conventional live-work units that would physically combine studio and living space, which are not supported by Local Plan policy. Such live/work units typically become conventional residential uses overtime.
- 6.3.5 Tethered housing seeks to provide the positive benefits of live/work, for small businesses and entrepreneurs including the fostering of creative communities and reducing the need to travel but with a physical separation that ensures the commercial space is used for its intended purpose throughout the life of the development. In addition the provision of affordable housing for creative business owners allows these owners to stay in the area and grow their business and contribute to Haringey's economy.
- 6.3.6 The 12 units of tethered housing are intended to be offered to eligible commercial occupiers (with their families) at a 75% discount of prevailing market rents. The occupier must be a licence holder of a commercial space. The other residential eligibility criteria are similar to London Plan affordable rent criteria including a £90,000 per annum household income restriction. The S106 agreement will obligate the developer to bring forward an Affordable Tethered Housing plan that will ensure tenant protection and set the parameters of the tethered housing, including periodic rent review mechanisms to ensure the 12 units of affordable housing remain below prevailing rent levels in perpetuity.
- 6.3.7 Providing affordable tethered units will support the provision of affordable workspace by providing on site accommodation at a discount from market rates which will ensure that creative businesses and entrepreneurs can occupy the commercial space and remain in the area should rent levels for commercial space increase in future. This will maximise the positive outcomes from the development in line with the site allocation requirements.

Viability Review

- 6.3.8 The Council's viability consultant BNPP has independently assessed the proposed affordable housing provision. The consultant's conclusion is that the scheme's offer of 12 units of tethered affordable housing is the maximum that can be delivered subject to viability and in light of the other planning objectives

required as per the site allocation, including maximising employment floorspace.

6.3.9 Officers agree with the conclusions of the consultant that the scheme provides the maximum amount of affordable housing subject to viability. In the event additional value is created in the scheme from market sales, this may be captured in a 75% of completion viability review (to be secured by S106 agreement) as discussed below and a payment in lieu of additional affordable housing would be provided.

6.3.10 Like a conventional affordable housing arrangement, early and late stage viability review mechanism have been agreed and will be secured by S106 agreement in line with London Plan guidance. The applicant has agreed these review mechanisms in line with the London Plan SPG Affordable Housing and Viability.

Affordable housing Summary

6.3.11 TAs well as delivering a well designed employment led regeneration scheme with affordable workspace the scheme makes provision for 12 units of affordable tethered housing. This affordable housing provision is welcomed. The tethered housing will allow commercial licence holders and their families to live on site at affordable rents. The affordable housing offer has been assessed by BNP Paribas and is considered the maximum amount of affordable housing that can be viably be delivered on the site. However an early and late viability review mechanism will be secured by S106 agreement. The affordable housing offer will protect and incentivise small businesses and entrepreneurs to invest in Tottenham in the long term, even as rents may rise. The affordable housing provision is therefore in accordance with local and London Plan policy.

6.4 ***Development Design***

6.4.1 The NPPF should be considered alongside London Plan Policies 3.5, 7.4 and 7.6, Local Plan Policy SP11 and DM1. Policy DM1 states that all development must achieve a high standard of design and contribute to the distinctive character and amenity of the local area. Further, developments should respect their surroundings by being sympathetic to the prevailing form, scale, materials and architectural detailing. Local Plan policy SP11 states that all new development should enhance and enrich Haringey's built environment and

create places and buildings that are high quality, attractive, sustainable, safe and easy to use.

- 6.4.2 The development embodies many of the key objectives of Creative Enterprise Zones within its physical design. As per the assessment below, the incorporation of meeting and social spaces within the scheme (including a pavilion space, courtyard space and ‘garden rooms’) meets with a key CEZ aim of forging creative relationships between artists, creative businesses, their clients, and local communities.
- 6.4.3 The commercial spaces are of varied and flexible sizes which have been designed based on the spaces utilised by existing small businesses and entrepreneurs in the area. The larger music studio space suitably located within the scheme has the potential to be a strong anchor to a creative community. The pavilion space is likely to act as a creative focal point for residents and to allow engagement with the wider area. The café and green space will activate the southern part of the site with pedestrian activity and will be the subject of increased surveillance and security. As per the assessment below, the physical design (underpinned by planning obligations to meet other economic and affordability objectives) is considered to be credible and well considered by officers.
- 6.4.4 The scheme is set out into residential and non-residential elements. The residential elements are generally positioned toward the site edges in four block typologies, with the commercial units on the ground floor and basement level, oriented inward to the courtyard area. The music studio and rehearsal space is at basement level.

Density

- 6.4.5 London Plan Policy 3.4 (Optimising Housing Potential) indicates that a rigorous appreciation of housing density is crucial to realising the optimum potential of sites. This approach to density is reflected in the Tottenham AAP. While the draft London Plan proposes to remove the London Plan’s density matrix, the current adopted London Plan remains part of the Development Plan for the site.
- 6.4.6 Given that this site is a vertically mixed schemes (i.e. where housing is on top of non-residential uses), the density has been calculated in line with GLA guidance and the size of the site has been reduced by an amount that is equivalent to the proportion of total floorspace allocated to non-residential uses (both below and

above ground, measured as GIA) for the purposes of calculating residential density.

- 6.4.7 The applicant proposes the provision of 99 residential units and the site has a PTAL rating of 6a. The proposal contains 290 habitable rooms and the redline area is 0.71 Hectares (Ha) in area. The site contains 2,446.9m² of ground floor and basement non-residential space and the total Gross Internal Area (GIA) of the development is 11,267.9m².
- 6.4.8 The non-residential proportion of uses on the site is 21% (2,446.9m²/11,267m²) and the site has therefore been reduced in area by 0.15 Ha to 0.56 Ha for the purposes of calculating density. The scheme consequently would have a density of 177 units/hectare (u/ha) and 517 habitable room/hectare (hr/ha). The scheme has an average of 2.9 habitable rooms/unit (hr/u).
- 6.4.9 The site is judged to be urban as a mix of uses and medium building footprints surrounds part of the site and it lies within 800m of the West Green / Seven Sisters District Centre. The London Plan sets a target range of 200–700 hr/ha and 70-260u/ha for schemes with an average hr/unit of 2.7-3.0. The proposal therefore falls within the density range for both units per hectare and habitable rooms per hectare.
- 6.4.10 The density of the proposal is therefore acceptable.

Dwelling Unit Mix

- 6.4.11 London Plan Policy 3.8 requires new residential developments to offer a range of housing choices in terms of the mix of housing sizes and types, taking account of the housing requirements of different groups and the changing roles of different sectors. Draft London Plan Policy H12C notes that Boroughs should not set prescriptive dwelling size mix requirements (in terms of number of bedrooms) for market and intermediate homes. Strategic Policy SP2 (Housing) and DPD Policy DM11 continue the current London Plan approach.

- 6.4.12 The scheme proposes the following unit mix:

No. of bedrooms	No. of units
1 bed units	40
2 bed units	46
3 bed units	13
Total	99

6.4.13 The proposal is considered to represent an appropriate dwelling mix given the site location. London Plan Policy 3.4 speaks to prioritising higher density provision for smaller households in areas with good public transport accessibility. The site delivers this provision in tandem with the Council's approach through the Tottenham Area Action Plan, to safeguard existing family homes in the area in order to promote a mixed and balanced communities.

6.4.14 The dwelling mix is therefore considered to offer a suitable range of housing choice in line with London Plan Policy 3.8 and draft London Plan Policy H12C and is consistent with Policy DM11.

Site Layout and Access

6.4.15 The residential elements have been positioned toward the site edges in four block typologies adjacent to existing residential uses. The commercial units on the ground floor and basement level are oriented inward to the courtyard area. There is sufficient space between buildings for pedestrian circulation and the site layout orientates street facing dwellings outward, with access to the commercial spaces and the café use along Bernard Road. The layout will also improve connectivity and permeability for pedestrians while generally constraining vehicle movement along adjoining roads. The layout will rationalised the parallel road layout in compliance with the site allocation. Pedestrian access from the site to Page Green Road is retained as per site allocation guidelines. The site access and layout is considered acceptable.

Development Height, Massing and Scale

6.4.16 DM6 states the Council expects building heights to be of an appropriate scale that respond positively to site surroundings, the local context, and the need to achieve a high standard of design in accordance with Policy DM1. The development proposal does not contain any 'Tall Buildings' (as defined by policy as 10 storeys or more) but the development does contain Taller Buildings' in the southwest corner of the site, 'defined as those that are two to three storeys higher than the prevailing surrounding building heights.

6.4.17 There is a tall building near the site, Cordell House, a post-war 13-storey tower block to the northeast of the application site however the prevailing building height in the area is 2 – 3 stories.

6.4.18 Policy DM5 requires that proposals for taller buildings be justified in urban design terms and should conform to the following general design requirements:

- a) Be of a high standard of architectural quality and design, including a high quality urban realm;
- b) Protect and preserve existing locally important and London wide strategic views in accordance with Policy DM5; and
- c) Conserve and enhance the significance of heritage assets, their setting, and the wider historic environment that would be sensitive to taller buildings (as per DM9).

6.4.19 The development proposes buildings of up to 7 storeys from ground level, at the highest point rising to approximately 25m from ground level (35m AOD).

6.4.20 The proposal is of high architectural quality in line with Policy DM5(a). The taller buildings incorporate a pitched roof design and a varied character across the site. The massing of the buildings is stepped down eastward to moderate the impact on adjoining residential dwellings and integrate their built form.

6.4.21 Brick built buildings are considered a sensitive design response to the character of the local area. The wider development will improve the urban realm with relocated green space and street tree planting. The scheme is considered to sit comfortably in the context of the local area.

6.4.22 The QRP responded positively to the building design, noting, “the panel welcome the extensive development of potential roof forms and doorways, for example, by drawing on the prevailing forms within the area.” The scheme is considered to meet strategic site requirements as it delivers an improved streetscape facing the existing homes on Ashby Road.

6.4.23 As per the assessment below and the comments of the Principal Conservation Officer, the development site is in close proximity to a Conservation Area but will not impact its setting or character and makes a modest but positive contribution to the wider character of Tottenham as a historic area.

6.4.24 The site fall within a Local View Corridor. View 26 notes an assessment point from the junction of Quernmore Road and Stapleton Hall Road looking east bound toward Tottenham Hale. As per the Townscape assessment in the

section below, the impact of the development on the view corridor will be negligible and the applicant is considered to have met the policy tests set in Policy DM 15.

6.4.25 The applicant has therefore met the policy tests set for taller buildings. The height and massing of the taller buildings on the site are considered to be justified and respond positively to the site's surroundings, the local context, and the need to achieve a high standard of design.

Townscape and View Management

6.4.26 Haringey's Strategic Policy SP12 and DPD Policy DM5 set out how the Council will protect the Strategic and Local View Corridors. The site does not intersect with a London Plan Strategic View but does lie within a Local View Corridor. View 26 notes an assessment point from the junction of Quernmore Road and Stapleton Hall Road looking east toward Tottenham Hale. From the assessment point, the development would not obstruct the linear view given the proposed heights and the development would be subservient to other tall buildings in the vicinity of site. The proposal is therefore judged to make a positive contribution to the character and composition of the view and is acceptable.

Development Materials

6.4.27 The applicant's Design and Access Statement notes that during design phase, the architects undertook a series of studies analysing the unique character of the Bernard Works area, and the materials proposed reflect this assessment.

6.4.28 The scheme is primarily brick built, with residential units types expressed by slight changes in materiality and facade expression. Officers agree with the applicant that proposed brick variations assist in breaking up the development into a series of distinct forms, while retaining an overall coherence across the site.

6.4.29 A buff/brown brick, reflecting the predominant brick type within the wider commercial industrial estate is proposed to contrast the yellow brick type along the existing residential terrace of Herbert Road. A red/brown variation reflects the predominant use of red and red painted brick along Ashby Road. This material also reflects the existing Toy Factory building directly across the new public park space.

6.4.30 A maroon/red brick is also incorporated, referencing the harder facing and edge bricks used within the historical warehouse types. Aluminium windows and doors are proposed and the scheme will also include precast concrete and perforated metal screening in commercial elements.

6.4.31 While exact produce references have not been provided, officers consider that the proposed materials are of a high quality and will relate well to the surrounding industrial and residential characters in the vicinity of the site. All materials will be subject to a planning condition that will require samples as well as specific product references at condition stage. Subject to condition the materials are acceptable.

Trees and Landscaping

6.4.32 The proposal will result in the re-location of an existing green space, but will deliver a replacement green space as noted above. The re-location will require the removal of 10 trees on the development site, however the applicant proposes a comprehensive re-planting program throughout the site. As noted above, there is in principle policy support for the re-location of open space. An assessment of the tree loss and the wider re-planting program is considered below.

6.4.33 The applicant has submitted an arboriculture assessment prepared by Syntergra dated October 2017. This assessment concludes the 10 trees that will be removed from the site in the event of redevelopment. These are assessed as Category B Trees (T1, T8, T9 and T10) and Category C Trees (T2, T3, T3, T3, T5, G6 and T7). There are no Category A Trees (the highest rating) proposed to be removed.

6.4.34 Two survey trees (T1:Common Lime and T8: Norway Maple) would be eligible for a TPO and a provisional Tree Protection Order for these trees has been made. Notwithstanding the making of the provision TPO, the Council's Arboriculture Officer has assessed the wider development proposal, including the survey categorisation and the proposed removal as well as the proposed enhancement including the landscape and ecological benefits of redevelopment.

6.4.35 The applicant's overall landscaping plan envisages 50 new trees including rows of streetscape trees along Ashby Road and Herbert Road to offset the tree

losses noted above. The landscaping proposals also incorporate landscaping in the interior courtyard and communal space to the rear of the units along Herbert Road. This includes 25 additional specimen shrubs to be planted in residential gardens.

6.4.36 Central to the landscape character of the new scheme is a public park that seeks to promote shared surface pedestrian circulation across the southern boundary of the site and incorporate play and amenity space for current and future residents.

6.4.37 While objections have been received concerning the loss of the 10 trees, (including 2 trees under temporary protection) are noted, given the views of the Tree Officer, and given the wider planning benefits of the proposal the loss of the trees noted is acceptable. The scheme is considered to be acceptable in arboricultural terms and the re-planting program will be required to be secured by planning conditions noted in Appendix 1. The grant of planning permission will supersede any temporary or confirmed Tree Protection Order.

Quality of Green Space provision

6.4.38 As noted above the application site contains an undesignated greenspace. In the event of redevelopment, the internal re-location of the greenspace across the site will result in a 33% increase of open space in close proximity to that replaced. The new greenspace is judged to be of a higher quality. The new space is a designed character which is considered to add value in planning terms and will ensure security and usability. The applicant's design and layout which will allow for a variety of uses is considered to be high quality design.

6.4.39 The sunlight analysis have shown that the communal open space located at the south border of the site will exceed BRE recommendations of at least two hours of direct sunlight on 21st March and therefore the levels of sunlight to the playspace and external café seating area are compliant with BRE criteria, which will assist in establishing secure and active public spaces.

6.4.40 The developer's obligation to maintain the space will prevent previous issues with fly tipping and rubbish. The replacement space meets in principle objectives for re-location as noted above and the replacement is in close proximity to the existing space. While the site is not located in an area of open space deficiency, the proposal delivers high-quality green space and off sets the

loss of greenspace on the north of the site with a higher quantum of provision. The re-located greenspace and wider landscaping of the development is acceptable subject to condition.

Quality Review Panel (QRP)

6.4.41 As noted above, the proposal has been assessed by Haringey’s QRP at pre-application stage. The Panel’s final review supported the scheme and stated:

“The Quality Review Panel welcomes the amended proposals for the Bernard Works site, and offers their support for the scheme, subject to its concerns about the privacy of single aspect ground floor flats being addressed. The panel would also encourage further refinement of the architecture, to add depth, richness and variation to the scheme. They feel that the overall concept promises high quality development, and would be a very positive addition to the local area. They also highlight that the success of such a scheme depends upon the implementation of a comprehensive management strategy for the open spaces and the café.”

6.4.42 A summary of the most recent Chair’s review is below, in addition to the applicant’s response and officer comments.

Quality Review Panel Chair’s Comment	Officer Response
Massing and development density	
<p>The panel welcomes the reduction in scale that has been achieved within the scheme, which will significantly improve the quality of the accommodation and open spaces.</p> <p>It understands concerns regarding the scale of the proposals fronting onto Ashby Road; but feels that as the width of the street is increasing, four storeys would be acceptable in this location.</p>	<p>Comments Noted</p>
Scheme layout	
<p>Single aspect flats at ground level can be problematic in terms of privacy and security, as bedrooms and living rooms will front onto public areas. The panel remains to be convinced that a one metre strip of planting will provide an adequate privacy buffer for such flats.</p>	<p>The design now proposes a series of changes to the ground plane and apartment layouts that respond to the panels concerns.</p> <p>To provide a greater sense of privacy for ground floor flats, the entire ground floor level is raised</p>

<p>One solution could explore the possibility of raising the floor level of the ground floor accommodation by 600mm, to lift the height of the window sill towards eye level, mitigating any views into the accommodation from outside.</p> <p>If the ground floor level were raised, careful consideration of inclusive design would be necessary to ensure that the scheme is compliant with Part M of the Building Regulations.</p>	<p>200 mm above street level. This is achieved by a Part M compliant ramp within the communal entry hall.</p> <p>Steps to the bedroom provide an additional rise in height of 350mm - creating a sense of further removal from the street level, and preventing overlooking into the bedroom space.</p> <p>This sense of protection is further improved by the planting to the bedroom window.</p> <p>Within the living room, 2no. 200mm steps step up to the external amenity space. This change in level creates a more generous height to the main living space - increasing daylight provision, while again removing the inhabitant further from the street</p>
<p>The panel notes that even if the privacy issues are resolved, deep plan dwellings with rear access corridors and kitchens without adequate daylight are not ideal.</p> <p>In this regard, they would strongly encourage the design team to consider incorporating maisonettes at ground level, with individual front doors opening onto the public realm. This would enable bedrooms to be located at a higher level, avoiding privacy conflicts at ground level.</p> <p>In addition, it would also support a more domestic frontage onto Ashby Road (that of two-storey maisonettes with individual front doors, with two storeys of flats above); which could help to promote a sense of community within the street.</p> <p>Avoiding a rear corridor access to the ground floor units (as currently shown) through the provision of individual front</p>	<p>The flats have been shown to receive adequate daylight.</p> <p>In response to the above comments, the Architects undertook a study of duplex unit feasibility along Ashby Road. The resultant study of two options found that in each case the duplex apartment layouts led to inefficiencies that would compromise the viability of the scheme and privacy issues set out below could not be addressed with these alternative layouts.</p>

<p>doors would also enable efficiencies within the floor plan. This should enable a greater number of units to be retained with a maisonette configuration than suggested by the design team.</p> <p>The panel notes that the standardised bay width may need to change in order to accommodate maisonettes with front access.</p>	<p>Changing the bay width would be likely to result in a less well composed elevation.</p>
<p>Architectural expression and place-making</p>	
<p>The panel welcomes the emerging architectural expression, but feels there is scope for further refinement and articulation to create visual depth and richness.</p> <p>The panel notes that whilst the development creates markedly different types of streets and spaces (new homes opposite 1930s houses, an urban commercial courtyard and a green open space), it relies on a single type of façade throughout.</p> <p>The panel would like to see more variation and articulation of the different parts of the development.</p> <p>In particular, the elevational treatment fronting onto Ashby Road would benefit from additional detail in order to break it down to a more domestic scale, as the distance between existing and proposed facades is only 17m.</p>	<p>Amendments were made the elevations. Sills, brick detailing, and particular architectural elements are expressed in subtly different ways creating a play of light and form. In each case the repetitive nature of the overall building form creates a simple backdrop for urban life, in keeping with the traditions of South Tottenham area.</p> <p>However as in the typical examples given below the variety in detailing and reinterpretation of contextual architectural elements is used to create a building that responds to and communicates with it's context, providing interest and delight to the public.</p>
<p>The inclusion of individual front doors fronting onto Ashby Road, in addition to some lighter visual elements would help to 'lift' the façade and create greater coherence within the street itself.</p>	<p>The measures set out above to improve the privacy of the single aspect units facing Ashy Road would not allow further front doors to be provided on this elevation. 2 communal doors are provided along this frontage with 6 front doors on Herbert Road.</p>
<p>The panel feels strongly that the success</p>	<p>A management strategy will be</p>

<p>of the scheme depends upon the implementation of a comprehensive management strategy for the open spaces and the café, to ensure that the quality of the development is maintained over time.</p>	<p>secured by the S106 obligations.</p>
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6.4.43 Officers consider the applicant has engaged with the QRP at the pre-application stage and the result is considered to be a high quality design that will deliver a significant quantum of high quality commercial worked space and market housing the delivers the site objectives. The remaining QRP concerns around access may be address by condition.

Secure by Design

6.4.44 The applicant has worked with the Secured by Design officer to address a number of issues raised earlier in the consultation process. The Design and Access Statement also contains a Security Assessment. Subject to condition, the Metropolitan Police raise no objection to the proposal in relation to security. A planning condition will also be imposed requiring compliance with the principles and practices of the Secured by Design award scheme and liaison with relevant officers will continue through into the condition stage if permission is granted. The proposal is acceptable in Secure by Design terms.

Development Design – Summary

6.4.45 The development will yield a density that is compliant with the London Plan Density Matrix. The density of the scheme is achieved through a high quality site layout that focuses denser development away from existing residential occupiers and provides opportunities for connection between creative commercial occupiers and future residents to strengthen the creative community. The rationalisation of the existing parallel road layout complies with the site allocation. The dwelling mix is considered to offer a suitable range of housing choice.

6.4.46 The design of the scheme is considered to be very high quality and well considered by officers. Officers consider that this development will provide a blueprint for future developments of this type. The mixed use development will

allow creative production to be integrated with residential uses while still being well managed and protecting the amenity of surrounding occupants.

6.4.47 The development embodies many of the key objectives of Creative Enterprise Zones (CEZs) within its physical design. The incorporation of meeting and social spaces within the scheme will encourage creative relationships between artists, creative businesses, their clients, and local communities.

6.4.48 The layout and access to the site is logical and the site requirements around retained pedestrian access are met. The applicant has met policy requirements around the provision of taller buildings and the massing and scale of the scheme are considered to respond well to the context of the area. The proposed materials are considered to be strong and the character of local views is preserved. Haringey's Quality Review Panel supports the scheme.

6.4.49 10 trees will be removed (including 2 temporarily protected trees) to allow redevelopment and a small undesignated greenspace will be lost. However this is offset by a comprehensive site wide tree re-planting programme together with landscaping treatment that will provide a new park (33% larger than the lost greenspace) and improved circulation and access to the site. The overall design of the development is considered strong and Haringey's Quality Review Panel supports the scheme. The development design is acceptable in accordance with the policy noted above.

6.5 Development Impacts to Heritage Assets

6.5.1 The legal position with respect to heritage assets is pursuant to Section 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 and as per relevant planning case law.

6.5.2 In short, there is a requirement that the impact of the proposal on the heritage assets be very carefully considered, that is to say that any harm or benefit to each element needs to be assessed individually in order to assess and come to a conclusion on the overall heritage position. If the overall heritage assessment concludes that the proposal is harmful then that should be given 'considerable importance and weight' in the final balancing exercise having regard to other material considerations which would need to carry greater weight in order to prevail.

6.5.3 Policy 7.8 of the London Plan requires that development affecting heritage assets and their settings to conserve their significance by being sympathetic to their form, scale and architectural detail. Policy SP12 requires the conservation of the historic significance of Haringey's heritage assets. Saved policy CSV5 of the Haringey Unitary Development Plan (UDP) (2006) requires that alterations or extensions preserve or enhance the character of the Conservation Area. Policy DM9 of the Councils Development Management DPD pre-submission version 2016 continues this approach.

Impacts to Heritage Assets

6.5.4 The site is not located in a Conservation Area, and does not contain any listed buildings. The Principal Conservation Officer has assessed the proposal and concludes the development would not have an impact on the Page Green/Seven Sisters Conservation area (located to the northwest of the site) or the listed Old Bank or Markfield Beam Engine nearby.

6.5.5 The Principal Conservation Officer considers the proposal is of high quality and has been sensitively designed to transition between the terraced streetscape and taller elements. The proposal, in the view of the Conservation Officer, would enhance the townscape of this part of Tottenham and would enhance the setting of the heritage assets within the wider area.

6.5.6 Given the view of the Conservation Officer is that the proposal would be of modest heritage benefit and that no planning harm to heritage assets would arise. In making this assessment great weight has been given to the preservation or enhancement of the heritage assets as per the Council's statutory requirement.

6.6 Ecology

6.6.1 London Plan Policy 7.19 indicates that whenever possible development should make a positive contribution to protection enhancement creation and management of biodiversity. Priority is given to sites with ecological designations. Local Plan Policy SP13 states that all development must protect and improve site of biodiversity and nature conservation.

6.6.2 The applicant has submitted a Preliminary Ecological Appraisal by MKA Ecology dated July 2017) The assessment notes that the site is not subject to any statutory or non-statutory ecological designations. An environmental statement is not required to accompany the application as it is not EIA development. The applicant's consultant concludes the buildings on site are considered to have

limited potential to support protected and notable species, such as breeding birds and roosting bats.

- 6.6.3 The applicant's consultant recommends that further survey work is conducted, consisting of a daytime bat inspection survey of the building on site in order to assess additional ecological issues.
- 6.6.4 A condition is recommended to secure updates to the ecological assessment and secure the ecological improvements including bat and bird boxes integrated into the landscaping. The ecological impacts of the development subject to condition are acceptable and in accordance with the policy cited above.

6.7 **Quality of Residential Accommodation**

- 6.7.1 London Plan policy 3.5 requires the design of all new housing developments to enhance the quality of local places and for the dwellings in particular to be of sufficient size and quality. The draft London Plan incorporates this approach in Policy D4.
- 6.7.2 Strategic Policy SP2 and Policy DM12 of the Council's Development Management DPD reinforce this approach. The Mayor's Housing SPG sets out the space standards for new residential developments to ensure an acceptable level of living accommodation is offered.
- 6.7.3 As set out in the QRP comments above the layout provides a high number of dual aspect units and dual aspect is considered to have been maximised with the single aspect units raised above ground level to ensure privacy. The separation of residential and commercial uses will ensure the occupants have a high level of amenity. All of the units in the scheme (including the 12 tethered units) meet the space standards in the Mayor's SPG Housing and the scheme will provide a high standard of residential accommodation. The units have private external amenity areas (either gardens or balconies). The provision meets the number of units per core as per London Plan Guidance and as per the assessment above the layout and design blocks is considered to offer a high quality design.

Children's Play Space

- 6.7.4 Policy 3.6 of the London Plan seeks to ensure that development proposals include suitable provision for play and recreation. Local Plan Policy SP2 requires residential development proposals to adopt the GLA Child Play Space Standards 2009, where London Plan Policy 3.6 and Local Plan Policy SP13 underline the need to make provision for children's informal or formal play space.

6.7.5 Based on the maximum quantum of residential units proposed the development's potential child yield and play space requirements have been calculated as follows:

Age	Number of Children
Under 5	8
5 to 11	3
12 +	2
Total Number of Children	13
Play Space Required	663.7m²

6.7.6 In total 13 children are predicted to live in the development, of which 8 would be under the age of 5. The applicant proposes 280m² of playspace within the site set within the which is interspaced within the re-located 1000m² greenspace, in a series of 'Garden Rooms'; defined spaces within the open space which meet a specific purpose. These spaces will provide suitable playspace for Under 5s as well as some 5-11 provision. The remaining 5-11 provision is available off site. The Bernard Works site is in good proximity to other playspace provision as noted below.

6.7.7 Markfield Park is a Borough SINC area and Metropolitan Open Land. There is access to other open spaces in close proximity, including Stamford Road Park which 220m away (which Homes for Haringey intends to upgrade to improve quality) and Rangemoor Road Open Space, which is 140m from the application site and incorporates playspace. Overall, the proposal delivers high-quality open space and is well located to a range of play spaces targeted to different age groups.

Inclusive Access

6.7.8 Local Plan Policy SP2 and Policy 3.8 of the London Plan require that all housing units are built to Lifetime Homes Standards with a minimum of 10% wheelchair accessible housing or easily adaptable for wheelchair users.

6.7.9 The development will provide 10 wheelchair accessible homes of varying unit sizes which will meet the 10% requirement in planning policy. The development will also provide accessible Blue Badge parking spaces along Ashby Road for existing disabled residents and future occupiers that are Blue Badge holders. Level access will also be provided through the common areas and lobbies etc. Level access will also be provided from the street to commercial premises.

- 6.7.10 The relevant Building Regulations requirements will be secured by condition. The accessibility of the scheme is judged to be acceptable and in accordance with the London and local policy, the Mayor's Housing SPG and the Mayor's Accessible London SPG.

Daylight/Sunlight Provision to Proposed Units

- 6.7.11 The Mayor's SPG Housing states that in relation to daylight and sunlight provision to new development an appropriate degree of flexibility needs to be applied when using Building Research Establishment (BRE) guidelines. Guidelines should be applied sensitively to higher density development, especially in accessible locations, where BRE advice suggests considering the use of alternative targets. This should take into account local circumstances and the need to optimise housing capacity.
- 6.7.12 The application includes daylight, sunlight and overshadowing assessments setting out the daylight and sunlight provision to future occupiers of the development. The daylight and sunlight light impacts to adjoining occupiers is set out in the Amenity section below.
- 6.7.13 This analysis demonstrates that the majority of habitable rooms within the scheme will achieve good levels of interior daylight. Overall, 83% of habitable rooms (145/174) within the development will achieve the guide levels for ADF and 91% will achieve the guide levels for NSL. Of the 29 rooms falling short of the recommendations, 13 are main living areas, 11 are kitchens, 2 are bedrooms and the remaining 3 are studio units.
- 6.7.14 Officers are of the view these results indicate good levels of compliance with the BRE criteria for a higher density urban development in London, having regard to the flexible, suburban basis of the BRE guidance.
- 6.7.15 The levels of sunlight and shadow to future residential units are considered to be acceptable. There are several living rooms located within Block C05 which see lower levels of sunlight in winter. This is owing to the proximity to Block C04. However, this is common of any high density urban development and officers share the applicant's conclusion that the occupants will still enjoy good sunlight in the 8 summer months.
- 6.7.16 Officers agree with the applicant's conclusion that the levels of daylight and sunlight to the proposed units are considered acceptable. The proposed new development is acceptable from a daylight/sunlight perspective.

Overheating

- 6.7.17 London Plan Policy 5.9 seeks to reduce the impact of the urban heat island effect in London and encourages the design of places and spaces to avoid overheating and excessive heat generation. Major development proposals are expected to demonstrate how the design, materials, construction and operation of the development would minimise overheating and also meet its cooling needs. New development in London should also be designed to avoid the need for energy intensive air conditioning systems as much as possible.
- 6.7.18 The applicant's energy statement sets out the approach to overheating using the London Plan cooling hierarchy. The applicant's conclusion is that whilst cooling is still present in non-residential areas, the specification of high efficiency cooling and ventilation systems minimises the energy consumption. The Council's Carbon Management Team has assessed the proposal as raises no objection with respect to overheating for residential or non-residential areas. On this basis the design is considered acceptable with regard to avoiding overheating and excessive heat generation.

Noise to Future Occupiers

- 6.7.19 The applicant has submitted an environmental noise survey prepared by Sandy Brown Consultants dated December 2017. This assessment concludes the site is suitable for new mixed use residential development given prevailing noise conditions. The Council's Environmental Health Officer has assessed the new residential units in relation to noise and concludes that subject to conditions (including a condition to install noise insulation between commercial uses and residential occupiers) the units will be of a suitable quality with respect to noise transmission. The impacts of construction and operational noise to adjoining occupiers are assessed in the section below.

Quality of Residential Accommodation – Summary

- 6.7.20 The proposed residential units will meet with London Plan standards. The proposal will provide high quality private external amenity spaces to the residential units and an acceptable number of dwellings per core. The scheme incorporates a policy compliant level of accessible and adaptable dwellings. The new residential units will receive good levels of daylight and sunlight and will be protected from the noise impacts of commercial uses (including the sub-grade music studio) by planning conditions and a management plan. The scheme does not require mitigation in relation to overheating. The scheme is therefore considered to deliver high quality residential accommodation for future occupiers in accordance with London Plan and local policy.

- 6.8 *Environmental Wind Impacts*

- 6.8.1 London Plan Policy 7.6 and 7.7 state that buildings and structures should not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to wind and microclimate. This is particularly important for tall buildings. Policy DM3 more broadly requires improvements to the public realm for pedestrians and cyclists in Haringey, and this approach is reflected in Tottenham Area Action Plan Policy AAP6.
- 6.8.2 The applicant has consequently submitted a wind comfort study, prepared by Chapman BDS P dated December 2017. The study concludes the resulting air speeds are as would be expected within any urban streetscape. The study also confirms that the internal courtyard and shared amenity spaces within the scheme and the south-facing private gardens of the maisonette units are very well sheltered from the predominant wind directions.
- 6.8.3 The applicant's analysis concludes there are no areas of concern regarding pedestrian comfort effects from the local wind microclimate for future and existing occupiers, and no further mitigation measures are deemed necessary. On this basis the micro-climate impacts are considered acceptable and in accordance with the policy above.

6.9 ***Air Quality***

- 6.9.1 The NPPF states that planning decisions should ensure that any new development in Air Quality Management Areas (AQMAs) is consistent with the local air quality action plan. London Plan Policy 7.14 sets out the Mayor's commitment to improving air quality and public health and states that development proposals should minimise increased exposure to poor air quality.
- 6.9.2 At the Local level, Policy SP7 states that in order to control air pollution developers must carry out relevant assessments and set out mitigating measures in line with national guidance. This approach is reflected in Policy DM23 which states that air quality assessments will be required for all major development and other development proposals, where appropriate.
- 6.9.3 The site falls within the LBH Air Quality Management Area (AQMA) which is a borough-wide designation due to measured exceedances of the air quality objectives for nitrogen dioxide (NO₂) and particulate matter (as PM₁₀). The primary source of emissions of these pollutants in the Borough is road traffic.
- 6.9.4 The Council's Environmental Officer has assessed the application. Based on the results of the applicant's air quality assessment prepared by XCO2

dated December 2017 it is concluded that redevelopment of the site would not cause a significant impact on local air quality.

6.9.5 The objections are noted in relation to traffic and air quality, and it is accepted that the proposed development will generate additional traffic movements on the local road network however these are not significant with the Transport Assessment noting there will be 15 vehicular movements during the AM Peak hour and 12 vehicular movements during the PM peak hour. Furthermore any development on the site in accordance with the site allocation will generate increased traffic.

6.9.6 The EHO has recommend the imposition of standard conditions to control air quality during the operational and construction phases of development. Subject to the imposition of these conditions, the air quality impacts of the development are acceptable.

6.10 **Development Impact to Adjoining Occupiers**

6.10.1 The London Plan Policy 7.6 states that development must not cause unacceptable harm to the amenity of surrounding land and buildings. Draft London Plan D13 seeks to manage noise and the draft London Plan Policy D12 seeks to put the onus on new development design to co-exist with existing noise. Policy DM1 requires developments to ensure a high standard of privacy and amenity for its users and neighbours. The key impacts to adjoining occupiers assessed below are daylight/sunlight issues, outlook and privacy, noise and comings and goings.

Noise and Disturbance

6.10.2 While the introduction of mixed use development will give rise to additional noise and comings and goings generated from future occupiers, the potential noise emanating from the scheme would not create a level of noise and disturbance over and above that of typical dwellings/flats or small scale commercial uses in an urban location. The site is generally isolated from existing residential uses and commercial uses are at or below grade and generally oriented inward. The access arrangement will direct vehicle and pedestrian movements toward the western side of the site, which is more commercial in nature.

6.10.3 The Council's Environmental Health Officer has assessed the proposal and the potential impacts to adjoining occupiers from the proposed development in noise terms. The EHO raises no objection to the scheme in relation to any overspill noise impacts subject to condition. The use of the pavilion and yard spaces are proposed to be address by way of a management plan that is to be secured by S106 agreement. Likewise, the scheme will be subject

to a pre-commencement planning condition requiring the installation of a sound insulation scheme to the music rehearsal space before operation.

- 6.10.4 Given that noise intensive uses have the potential to currently operate from the B8 land, the conversion of the site to predominantly residential use is considered to be an improvement in noise terms. The noise and disturbance impacts generated by future occupiers of the land are acceptable in planning terms.
- 6.10.5 The impacts are of construction noise are temporary and are proposed to be controlled by condition. The applicant has submitted a Construction Logistics Plan and a Demolition Logistics Plan. The applicant will also be required to join the Considerate Contractors scheme (as per the S106 agreement), with proof of registration provided to the Local Authority.
- 6.10.6 The temporary noise impacts during the construction are, subject to condition, judged acceptable. The operational noise impacts introduced by the development are acceptable given the existing uses on the site and the nature of the scheme.

Privacy and Outlook

- 6.10.7 It is acknowledged the scheme will face neighbouring dwellings. Objections to the proposal have made reference to issues of privacy and outlook in submissions to the Council. The interaction between existing and proposed residential dwellings has the potential to occur along Herberst Road, Ashby Road and to the rear of Cameron Terrace.
- 6.10.8 With respect to Herbest Road the development would be 4 stories and 14.5 metres from the dwellings opposite on Herbert Road. With respect to Ashby Road, the 4 storey element will face the public front of the existing dwellings and there are inset balconies facing the street on upper levels. The separation distance will be 17 metres. These distance in privacy terms would be comparable to a conventional street in urban London. The interaction is oriented to the front of the existing properties.
- 6.10.9 With respect to Cameron terrace the proposed 3 storey mews block which would back onto these existing dwelling would be stepped back as the height increases with separation distances of 10 metres, 12 metres and 14.5 metres for the ground, 1st and 2nd floors respectively.
- 6.10.10 The separation distances of are acceptable and the proposed development would not unduly constrain the outlook to any property along Ashby Road. Any negligible planning harm arising from overlooking between existing and proposed properties along Ashby Road is significantly outweighed by

improvements to the streetscape and other planning objectives achieved by development.

- 6.10.11 The second area where potential overlooking between proposed and existing dwelling may occur is at the rear of 13-18 Cameron Terrace and access/amenity area on the proposed interior block. The applicant has sought to mitigate this potential overlooking by the provision of perforated screening on the amenity area, details of which will be subject to a planning condition. Given the separation distance and the mitigation proposed, the privacy impacts are judged to be negligible at this location.
- 6.10.12 The nature of urban London is such that some impacts to amenity may arise from development, but the planning harm arising in this instance is negligible and when weighed against other planning benefits of the scheme significantly outweighed. The privacy impacts to adjoining occupiers are acceptable and in accordance with the policy noted above.

Daylight/Sunlight Impacts to Adjoining Occupiers

- 6.10.13 The Mayor's Supplementary Planning Guidance (SPG) Housing indicates that BRE guidelines on assessing daylight and sunlight should be applied sensitively to higher density development in London, particularly in central and urban settings, recognising the London Plan's strategic approach to optimise housing output (Policy 3.4) and the need to accommodate additional housing supply in locations with good accessibility suitable for higher density development (Policy 3.3).
- 6.10.14 Quantitative standards on daylight and sunlight should not be applied rigidly, without carefully considering the location and context and standards experienced in broadly comparable housing typologies in London. The applicant has submitted a Daylight/Sunlight assessment dated December 2017 prepared by Gia.

Daylight/Sunlight – Methodology

- 6.10.15 The impacts of daylight provision to adjoining properties arising from proposed development is considered in the planning process using advisory Building Research Establishment (BRE) criteria. A key measure of the impacts is the Vertical Sky Component (VSC) test.
- 6.10.16 In conjunction with the VSC tests, the BRE guidelines and British Standards indicate that the distribution of daylight should be assessed using the No Sky Line (NSL) test. This test separates those areas of a 'working plane' that can receive direct skylight and those that cannot.

- 6.10.17 If following construction of a new development, the no sky line moves so that the area of the existing room, which does receive direct skylight, is reduced to less than 0.8 times its former value, this will be noticeable to the occupants and more of the room will appear poorly lit.
- 6.10.18 The BRE Guide recommends that a room with 27% VSC will usually be adequately lit without any special measures, based on a low density suburban model. This may not be appropriate for higher density, urban London locations and the Mayor's Housing SPD notes that guidance should not be applied rigidly to proposals in urban areas for this very reason in that developments in urban areas are of much higher density than developments in more suburban areas.
- 6.10.19 It is considered that VSC values in excess of 20% are considered as reasonably good and that VSC values in the mid-teens are deemed acceptable within a high density urban location. Paragraph 2.3.47 of the Mayor's Housing SPD supports this view as it acknowledges that natural light can be restricted in densely developed parts of the city.
- 6.10.20 The acceptable level of sunlight to adjoining properties is calculated using the Annual Probable Sunlight Hours (APSH) test. In terms of sunlight, the acceptability criteria are greater than 25% for the whole year or more than 5% between 21st September and 21st March.

Daylight Assessment

- 6.10.21 The daylight report notes that Technical analyses indicate that there will be no material daylight (VSC and NSL) or sunlight (APSH), loss to the following 11 residential properties as a result of the development. As these properties will retain sufficient levels of VSC, NSL and APSH, they will remain fully in accordance with the BRE guidelines.
- 10 Cameron Terrace;
 - 11 Cameron Terrace;
 - 12 Cameron Terrace;
 - 14 Herbert Road;
 - 16 Herbert Road;
 - 18 Herbert Road;
 - 20 Herbert Road;

- 22 Herbert Road;
- 24 Herbert Road;
- 26 Herbert Road;
- 17 Ashby Road.

6.10.22 Of the remaining properties, the consultant notes that the effect of the construction on the daylight and/or sunlight amenity of the following properties is considered to be negligible to minor:

- 13 Cameron Terrace – minor impacts daylight.
- 14 Cameron Terrace
- 15 – 18 Cameron Terrace
- 28 Herbert Road
- 30 Herbert Road
- 32 Herbert Road
- 34 Herbert Road
- 36 Herbert Road
- 1 – 16 Ashby Road

6.10.23 While the above are not fully compliant with BRE criteria, officers consider the impacts to be minor and acceptable in the London context. As per the above, the non-compliant VSC values are in excess of 20% excepting three windows assessed and the three windows below 20% VSC are all in the mid-teens, which is deemed acceptable given the site location and that these rooms are generally served by other windows. With respect to APSH, the annual and winter sunlight levels for the above properties are acceptable and the impacts is considered is to be minor.

6.10.24 The daylight assessment concludes that the effect of the construction of the proposed development upon the daylight amenity to the majority of the surrounding residential rooms tested is considered to be negligible on the basis that the daylight amenity alterations are fully compliant with BRE guidance. This means that the occupants of these rooms are unlikely to notice any alteration to their levels of daylight amenity.

6.10.25 Overall, the applicant's consultant concludes the proposal will relate well to the neighbouring residential properties. Where there are deviations from BRE guidance in terms of VSC and NSL alterations, these are considered to be minor in nature.

6.10.26 This position is in line with the Mayor's Housing SPD which supports this view as it acknowledges that natural light can be restricted in densely populated areas. The daylight/sunlight impacts to adjoining properties are therefore acceptable in planning terms.

Sun Hours On Ground (SHOG) to Existing Amenity Spaces

6.10.27 A "sun hours on ground" assessment has been carried out for the rear gardens of properties 11-18 Cameron Terrace on Herbert Road and the communal external amenity area for the block of flats fronting onto Newton Road further north of the Site.

6.10.28 The results show that 4 of the 7 external amenity areas assessed will meet the BRE criteria for receiving sufficient direct sunlight. The remaining 3 gardens assessed which fall below the BRE recommendations are located to the rear of nos. 13, 14 and 15 Cameron Terrace. However, these areas experience very minor overall reductions of sunlight which are not considered to cause adverse harm to the sunlight amenity.

6.10.29 However, Overall officers agree with the assessment that the development will not cause an adverse impact on the sunlight amenity to the relevant surrounding external areas of the site.

Daylight/Sunlight – Conclusion

6.10.30 The daylight/sunlight assessment has found that the significant majority of properties tested would continue to receive adequate levels of daylight and sunlight – is sound. In coming to this view, officers have noted the Mayor's guidance around the sensitive application of BRE criteria in context and that the site is allocated the local plan for redevelopment. Many properties currently enjoy a significant benefit due to the nature of the current site and its comparative lack of development, and as such the impacts on their dwellings must take this into consideration when forming a view around daylight/sunlight.

6.10.31 Given the overall level of compliance, the current condition of the site and the need to consider the applicability of the BRE guidelines to urban areas the daylight/sunlight impacts to adjoining properties are acceptable and the proposal is in conformity with London Plan Policy 7.6 and Policy DM1.

Summary - Development Impact to Adjoining Occupiers

6.10.32 The scheme is designed to mitigate the increased comings and goings to the site associated with mixed use development. The scheme is not anticipated to give rise to privacy or overlooking impacts given its separation distance from existing residential development. Given the existing commercial use of the land, the change of use to residential-led mixed use is considered reduce the potential noise impacts to adjoining occupiers. The impacts of construction noise and disruption are temporary and will be controlled by condition. The daylight/sunlight impacts to adjoining occupiers are acceptable for an urban site in London. The amenity impacts to adjoining occupiers are considered to be acceptable.

Basement Development

6.10.33 Policy DM18 relates to new Basement development and sets out criteria for where basements can be permitted. Which must be addressed through a a Basement Impact Assessment (BIA).

6.10.34 The development proposal includes non-residential basesment rehearsal space and commercial units. The applicant has prepared a Basement Impact Assessment (BIA) prepared by Soils Limited dated December 2017. Officers accept the findings of the report that the proposed development would have a limited impact on neighbouring properties, land or slope stability and the hydrogeology and hydrology of the site, provided a suitable basement construction is selected. In order to ensure suitable basement development, an updated BIA will be required with more detailed design information.

6.10.35 Subject to condition, the basement development is considered to preserve the amenity and structural stability of adjoining properties. The basement development is therefore in accordance with the policy and guidance above.

6.11 Transportation, Parking and Highway Safety

6.11.1 Local Plan (2013) Policy SP7 Transport states that the Council aims to tackle climate change, improve local place shaping and public realm, and environmental and transport quality and safety by promoting public transport, walking and cycling and seeking to locate major trip generating developments in locations with good access to public transport. This approach is continued in DM Policies DM31 and DM32. The applicant has submitted a Transportation Assessment prepared by Steer Davies Gleer dated December 2017.

6.11.2 The site is located in an area with a high public transport accessibility level where development plan policies support developments with low levels of

car parking provision. The development site is highly accessible with a Public Transport Accessibility Level (PTAL) of 6A, however there is a section which falls within PTAL 3.

Trip Generation

- 6.11.3 The applicant's consultant concludes the proposed development will result in a total addition of 15 vehicular movements during the AM Peak hour and 12 vehicular movements during the PM peak hour. This level of activity represents an addition of one vehicle per 4 minutes in the AM peak and the addition of one vehicular movement per 5 minutes in the PM peaks. The volume of vehicular movements will not have any significant impacts with regard to the operation of the immediate or wider transport network. The level of trip generation resulting from the development is therefore acceptable.

Car Parking

- 6.11.4 Policy 6.13, of the London Plan sets out the car parking standards and strategic direction to facilitate new developments with appropriate levels of parking. It indicates that, maximum car parking standards for residential developments in the outer London with a high PTAL, is up to 1 space per unit. LBH is identified in map 2.2, of the London Plan, as part of the outer London.
- 6.11.5 A total of 18 car parking spaces are included in this proposal, 3 of which are relocated on-street standard parking bays from Ashby Road to Herbert Road. 13 residential car parking spaces are included (10 parking bays for Blue Badge users are provided along Ashby Road, whereas the other 3 standard bays are proposed along the Herbert Road). All residential parking spaces created on this proposal will be part of the CPZ and could be utilized by other Blue Badge holders residing or visiting this area. 5 commercial parking bays are proposed (3 standard bays, 2 for blue badge users).
- 6.11.6 The proposal is judged to be "car free" because all residents (other than Blue Badge holders), are not entitled to purchase on-street parking permits within the CPZ. The applicant has agreed to this approach and car free development will be secured by S106 obligation. The car parking arrangements proposed are acceptable and are not anticipated to give rise to overspill parking impacts.

Cycle Parking

- 6.11.7 There are 183 cycle parking spaces proposed. This is comprised of: 158 (long stay residential) and 3(short stay residential), for B1 commercial and

sui generis uses, 17 (long stay) and 5 (short stay) cycle parking spaces. The level of provision is compliant, however details are to be secured by planning condition as per Appendix 1.

Parking Restrictions on the Public Highways

- 6.11.8 The development site is within the Seven Sisters (7S), Controlled Parking Zone (CPZ) restricting on-street parking, Monday to Saturday, from 8am to 6.30pm. There are some nearby road which are not within the CPZ, which could be affected when this proposal is occupied.
- 6.11.9 In order to control potential parking displacement following the occupation of proposed development, S106 contributions are required to assess and control displacement parking issues in surrounding streets. These contributions are to be secured by way of a S106 obligation. The applicant and the developer have also agreed travel planning obligations which are reflected in the Heads of Terms for the S106 agreement at the Head of this report.
- 6.11.10 The development proposal will retain the quantum of CPZ parking in the vicinity of the site with additional spaces provided for Blue Badge parking and the high level of transport accessibility justifies a “car free” development with no allocated on site car parking, and a planning obligation that precludes future occupiers from holding residential parking permits. The level of traffic generation would not give rise to any safety or operational highway issues, and the alterations to the public highway are judged acceptable subject to conditions and an obligation for the developer to enter into a S278. The level of cycle parking is policy compliant. The development is acceptable in transportation planning terms.

6.12 Waste and Servicing

- 6.12.1 London Plan Policy 5.16 indicates the Mayor is committed to reducing waste and facilitating a step change in the way in which waste is managed. Local Plan Policy SP6 “Waste and Recycling” and require development proposals make adequate provision for waste and recycling storage and collection. This approach continues in draft London Plan policy S18 and at the local level as per DPD Policy DM4.
- 6.12.2 The applicant’s Transport Assessment contains a section on waste strategy. Separate storage streams are shown on for the residential and the commercial areas. The commercial waste will be collected using a private provider.

- 6.12.3 The Council's Waste Management Team and Transport Team have separately assessed the proposal in waste terms. While there is no in principle objection from the Waste Management Team several waste issues management issues need resolution by way of a waste management plan (including collection details). A planning condition requiring a waste management plan is set out in Appendix 1.
- 6.12.4 The Council's Transportation Officer has assessed the proposal in relation to refuse collection. The applicant has provided a vehicle swept path analysis which demonstrates that refuses vehicle can enter and leave the site, however further details are required with respect to collection areas. The applicant will be required to produce a detailed Delivery and Servicing Plan in consultation with the Council's refuse contractor. This can be secured by condition.
- 6.12.5 Objections have been received concerning the servicing requirements of the mixed use scheme, it is considered the provision of a servicing plan will ensure servicing does not impact on the surrounding area. It is therefore considered that the residential or commercial waste servicing would not cause significant impacts to the surrounding area.
- 6.12.6 Subject to acceptable condition details, the development proposal is considered to make adequate provision for waste recycling, storage and collection and is in accordance with the relevant policy cited above.

6.13 **Flood Risk and Drainage**

- 6.13.1 London Plan (2011) Policy 5.13 (Sustainable drainage) and Local Plan (2013) Policy SP5 (Water Management and Flooding) require developments to utilise Sustainable Urban Drainage Systems (SUDS) unless there are practical reasons for not doing so, and aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible in line with the drainage hierarchy.
- 6.13.2 Policy also requires drainage to be designed and implemented in ways that deliver other policy objectives, including water use efficiency and quality, biodiversity, amenity and recreation. Further guidance on implementing Policy 5.13 is provided in the Mayor's Sustainable Design and Construction SPG (2014) including the design of a suitable SUDS scheme. The site is located within Flood Zone 1 and is therefore considered to have a low probability of flooding. The applicant has submitted a Flood Risk Assessment (FRA) prepared by Michael Barclay Partnership dated July 2017.

- 6.13.3 The FRA concludes that the site is located entirely within Flood Zone 1 and is at a low risk from fluvial and tidal flooding. Given the existing developed nature of the site and surrounding area it is also considered that the site is at low risk from surface water flooding, groundwater, sewer flooding and also as a result of artificial sources. The proposal includes drainage features such as a tank structure which also includes a sump and pump for the basement.
- 6.13.4 The Council's Local Lead Flood Authority has assessed the scheme and requires the imposition of planning conditions to secure drainage details including the design features noted above. A planning condition will also seek to secure the SUDS features and attenuations targets proposed by the applicant. The Environment Agency and Thames Water do not raise an objection to the scheme subject to conditions noted in Appendix 1. The development is acceptable in Flood Risk and drainage terms.

6.14 **Energy and Climate Change**

- 6.14.1 The NPPF and London Plan Policies 5.1, 5.2, 5.3, 5.7, 5.8, 5.9, 5.10 and 5.11, and Local Plan Policy SP4 sets out the approach to climate change and requires developments to meet the highest standards of sustainable design, including the conservation of energy and water; ensuring designs make the most of natural systems and the conserving and enhancing the natural environment. The London Plan requires all new homes to achieve a zero carbon target beyond Part L 2013 of the Building Regulations.
- 6.14.2 The London Plan also sets a target of 25% of the heat and power used in London to be generated through the use of localised decentralised energy systems by 2025. Where an identified future decentralised energy network exists in close proximity to a site it will be expected that the site is designed so that it can easily be connected to the future network when it is delivered. The Council's Planning Obligations SPD (October 2014) requires obligations to futureproof a potential connection to the district energy network by way of a planning obligations agreement pursuant to S106 of the TCPA 1990.
- 6.14.3 New development is expected to achieve the necessary energy and CO2 requirements within the London Plan and Haringey Council's Local Plan or pay an offset payment. The applicant has submitted an Energy Strategy prepared by Renewable Environmental Services dated December 2017. The Council's Carbon Management Team has assessed the proposal in energy and sustainability terms.
- 6.14.4 While the scheme was initially envisaged to include a micro-Combined Heat and Power (CHP) Unit, following discussions between the applicant and the Council's Carbon Management Team it was agreed CHP may not be

appropriate for this development due the scale and connectively, and that allowance should be made to connect this development to a future district heat network which is likely to be provided on another site within a masterplan for the existing employment area. The sustainability features agreed were therefore:

- A single heating and hot water system, powered by a single energy centre and serving all units (residential and non-domestic) on the site;
- A 30 kWp of Photo-Voltaic (PV) system covering 150m² of flat roof area (including access) to accommodate the estimated PV capacity.

6.14.5 The Carbon Management Team notes that a single heating and hot water system will be installed across all units. The carbon savings from renewable technologies (Solar PV) is 7.9%.

6.14.6 This means that the development gives an overall saving of 3.4% against building regulation 2013 on regulated energy and the applicant has agreed to offset the remaining emissions. While this a comparatively low level of on site carbon savings, the Carbon Management Team accept the building design and mixed used element indicates a higher offset payment is suitable in this instance. The developer has agreed to off-setting the remaining emissions at a cost of £382,305.

6.14.7 The Carbon Management Team considers these measures, alongside the site wide energy network, makes the scheme policy compliant and should be secured through conditions and legal agreement. Subject to the carbon offset amount, noted above and the securing the sustainability features, the scheme is considered acceptable in sustainability terms in accordance with the policy above.

6.15 **Land Contamination**

6.15.1 Policy DM32 require development proposals on potentially contaminated land to follow a risk management based protocol to ensure contamination is properly addressed and carry out investigations to remove or mitigate any risks to local receptors. The applicant has submitted a Phase 1 Desk-top study prepared by Soils Ltd dated April 2017.

6.15.2 The Council's Environmental Health Officer (Pollution) has assessed the proposal and raises no objections subject to the imposition of standard conditions around land remediation on any grant of planning permission. These standard conditions are recommended for imposition and require further assessment of site conditions and remediation where required.

6.16 **Fire Safety and Security**

- 6.16.1 Fire safety is not a planning matter and it is usually addressed by Building Regulations. Building Regulations are minimum standards for design and construction for the erection of new buildings and the alterations of existing buildings. The regulations cover many areas including requirements surrounding structure, fire, sound resistance, ventilation, drainage, conservation of fuel, electrical installations, security and access for disabled people. In light of recent events, the following information around fire safety and security is provided.
- 6.16.2 The development would be required to meet the Building Regulations in force at the time of its construction. The Building Control Body (the Local Authority or an Approved Inspector) would carry out an examination of drawings for the proposed works and carry out site inspections during the course of the work to ensure the works are carried out correctly as far as can be ascertained. As part of the plan checking process a consultation with the Fire Service would also be carried out. On completion of work the Building Control Body will issue a Completion Certificate to confirm that the works comply with the requirement of the Building Regulations.

Materials

- 6.16.3 When the materials are submitted for the discharge of the materials condition the materials will need to meet the Building Regulations in force at the time and also take account of the current Government Guidance. The highest possible quality of fire resistance will be required.
- 6.16.4 Exact materials on the elevations of the building have yet to be confirmed. However, the applicant has confirmed the development will be brick built non-combustible materials and the issue of fire safety will be addressed at the Building Regulations stage.
- 6.16.5 As such, it is considered that the suite of measures proposed for the development, including a sprinkler system and non-combustible materials, is sufficient for the application to be acceptable in terms of its fire safety measures.

6.17 **Conclusion**

- 6.18 This proposal is very well designed and has been formulated with the needs of the end user in mind and offers an innovative approach to employment led redevelopment which officers consider offers a model approach for future schemes.

- 6.19 The proposed development is in line with the strategic site allocation requirements (TH12 - Herbert Road) and is judged to be a catalyst that will encourage and retain small scale creative enterprises in the area.
- 6.20 The applicant has followed a master planned approach. The proposal is considered to meet the policy criteria for redevelopment within a Local Employment Area (Regeneration Area). The development maximises employment floorspace and delivers 25 units of commercial floorspace of varying sizes and layouts. The scheme will make a contribution of 99 homes for which there is a substantial and pressing need in the locality
- 6.21 The scheme provides 12 units of affordable tethered housing that will protect and incentivise artists and creative businesses to invest in Tottenham in the long term, even as rents may rise.
- 6.22 The principle of the re-location of the open space within the site is acceptable. Redevelopment will result in the loss of 10 trees (including 2 provisionally protected trees). However, these losses are offset by a comprehensive site-wide tree re-planting program (with street trees provided along Ashby Road and Herbert Road) together with landscaping treatment that will provide a high quality park. The re-configuration will provide a 33% increase in open space and improved pedestrian circulation and access.
- 6.23 The development's physical design embodies many of the key objectives of Creative Enterprise Zones (CEZs). The incorporation of meeting and social spaces within the scheme will encourage creative relationships between artists, creative businesses, their clients, and local communities.
- 6.24 The density is compliant with the London Plan Density Matrix. The design of the scheme is credible and well considered. The mixed use development will allow creative production while still being well managed and protecting local amenity.
- 6.25 The layout and access to the site is logical and the strategic site requirements around retained pedestrian access are met. The applicant has met policy requirements around the provision of taller buildings and the massing and scale of the scheme responds positively to the context of the area. Haringey's Quality Review Panel supports the design of the scheme.
- 6.26 The new residential units will provide high quality residential units and will not have significant impact on neighbouring occupiers. The transport impacts of the development are considered to be acceptable.
- 6.27 All other relevant policies and considerations, including equalities, have been taken into account. Planning permission should be granted for the

reasons set out above. The details of the decision are set out in the RECOMMENDATION.

7 Community Infrastructure Levy (CIL)

7.1 Based on the information given on the plans (and incorporating 12 units of affordable housing), the Mayoral CIL charge will be £381,948 and the Haringey CIL charge will be £152,580.

7.2 This will be collected by Haringey after/should the scheme is/be implemented and could be subject to surcharges for failure to assume liability, for failure to submit a commencement notice and/or for late payment, and subject to indexation in line with the construction costs index. An informative will be attached advising the applicant of this charge.

8 RECOMMENDATIONS

8.1 GRANT PERMISSION subject to conditions in Appendix 1 and subject to Section 106 legal Agreement.

