

Planning Sub Committee 11 December 2023

ADDENDUM REPORT FOR ITEMS

UPDATE FOR CONSIDERATION AT PLANNING SUB-COMMITTEE Item No. 11

Reference No: HGY/2023/2306 & 2307	Ward: Bruce Castle (Northumberland Park opposite)
Address: 'Printworks' 819-829 High Road, Tottenham, London, N17 8ER	
Proposal: Full planning application for the demolition of existing buildings and structures to the rear of 819-829 High Road; the demolition of 829 High Road; and redevelopment for purpose-built student accommodation (Sui Generis) and supporting flexible commercial, business and service uses (Class E), hard and soft landscaping, parking, and associated works. To include the change of use of 819-827 High Road to student accommodation (Sui Generis) and commercial, business and service (Class E) uses. (HGY/2023/2306).	
Listed building consent (LBC) for internal and external alterations to 819/821 High Road (Grade II), including reinstatement of hipped roof, demolition works to the rear, façade and related external works, internal alterations, and associated works. (HGY/2023/2307)	
Applicant: High Road West (Tottenham) Limited - Tottenham Hotspur Football Club (THFC)	
Ownership: Private	

1. Correction on page 495 and 496 of the pack, paragraphs 6.22.12, 6.22.14, and 6.22.15 are shown in red but shall be changed to black with the following further changes to 6.22.15 as this paragraph reflected the previous iteration of the scheme and included incorrect information and figures:

- Paragraph currently reads as follows:

Planning conditions could secure commitments in relation to water usage, BREEAM 'Very Good' for the commercial units and measures to further the Circular Economy agenda. Subject to s106 planning obligations, the scheme would be connected to the proposed Heat Network and include some roof level PVs to help deliver 68% carbon emissions savings (SAP2012 carbon factors) (with offsetting financial contributions making up the shortfall). This is also likely to improve as the detailed design comes forward.

And shall be changed to:

Planning conditions could secure commitments in relation to water usage, BREEAM 'Very Good' for the student accommodation and measures to further the Circular Economy agenda. Subject to s106 planning obligations,

the scheme can be connected to the proposed Heat Network and would include some roof level PVs to help deliver at least 10% carbon emissions savings (with offsetting financial contributions making up the shortfall). This is also likely to improve as the detailed design comes forward.

2. Correction to Condition 8 BREEAM Certificate in Appendix 01 – Planning Conditions & Informatives:

Condition currently reads:

8. BREEAM Certificate

(a) Prior to commencement of above ground works, a design stage accreditation certificate for every type of non-residential category must be submitted to the Local Planning Authority confirming that the development will achieve a BREEAM “Very Good” outcome (or equivalent), aiming for “Excellent”. This should be accompanied by a tracker demonstrating which credits are being targeted, and why other credits cannot be met on site.

The development shall then be constructed in strict accordance with the details so approved, shall achieve the agreed rating and shall be maintained as such thereafter for the lifetime of the development.

(b) Prior to occupation, a post-construction certificate issued by the Building Research Establishment must be submitted to the local authority for approval, confirming this standard has been achieved.

In the event that the development fails to achieve the agreed rating for the development, a full schedule and costings of remedial works required to achieve this rating shall be submitted for our written approval with 2 months of the submission of the post construction certificate. Thereafter the schedule of remedial works must be implemented on site within 3 months of the Local Authority’s approval of the schedule, or the full costs and management fees given to the Council for offsite remedial actions.

REASON: In the interest of addressing climate change and securing sustainable development in accordance with London Plan (2021) Policies SI2, SI3 and SI4, and Local Plan Policy SP4 and DM21.

- Changes are required to allow demolition for more flexibility.
- Changes are also required to delay the trigger to part (b) to allow for any delays in the issuing of the post-construction certificate which can take a while to be issued by the BRE. Changes as follows:

8. BREEAM Certificate

(a) Prior to commencement of any above ground works (excluding demolition), a design stage accreditation certificate for every type of non-residential category must be submitted to the Local Planning Authority confirming that the development will achieve a BREEAM “Very Good” outcome (or equivalent), aiming for “Excellent”.

This should be accompanied by a tracker demonstrating which credits are being targeted, and why other credits cannot be met on site.

The development shall then be constructed in strict accordance with the details so approved, shall achieve the agreed rating and shall be maintained as such thereafter for the lifetime of the development.

(b) Within 6 months of first occupation, a post-construction certificate issued by the Building Research Establishment must be submitted to the local planning authority for approval, confirming this standard has been achieved.

In the event that the development fails to achieve the agreed rating for the development, a full schedule and costings of remedial works required to achieve this rating shall be submitted for our written approval with 2 months of the submission of the post construction certificate. Thereafter the schedule of remedial works must be implemented on site within 3 months of the Local Authority's approval of the schedule, or the full costs and management fees given to the Council for offsite remedial actions.

REASON: In the interest of addressing climate change and securing sustainable development in accordance with London Plan (2021) Policies SI2, SI3 and SI4, and Local Plan Policy SP4 and DM21.

3. Correction to Condition 21 Energy Strategy in Appendix 01 – Planning Conditions & Informatives:

Condition currently reads:

21. Energy Strategy

The development hereby approved shall be constructed in accordance with the Sustainability & Energy Statement Revision P04 prepared by Buro Happold (dated 30 Nov 2023) delivering a minimum 15% improvement on carbon emissions over 2021 Building Regulations Part L, with SAP10.2 emission factors, high fabric efficiencies, DEN connection, and a minimum 65 kWp solar photovoltaic (PV) array.

(a) Prior to above ground construction, details of the Energy Strategy shall be submitted to and approved by the Local Planning Authority. This must include:

- Confirmation of how this development will meet the zero-carbon policy requirement in line with the Energy Hierarchy;
- Confirmation of the necessary fabric efficiencies to achieve a minimum 5% reduction with SAP10.2 carbon factors; it is advised to improve this aiming for the minimum 15% reduction.
- Details to reduce thermal bridging;
- Explore further ways to minimise the Energy Use Intensity including but not limited to incorporating waste-water heat recovery;
- Location, specification and efficiency of the proposed alternative low carbon heating system (Coefficient of Performance, Seasonal Coefficient of

Performance, and the Seasonal Performance Factor), with plans showing the pipework and noise and visual mitigation measures;

- Details of the PV, demonstrating the roof area has been maximised, with the following details: a roof plan; the number, angle, orientation, type, and efficiency level of the PVs; how overheating of the panels will be minimised; their peak output (kWp); and how the energy will be used on-site before exporting to the grid;
- Specification, location of any additional equipment installed to reduce carbon emissions for example MVHR;

(b) The solar PV arrays must be installed and brought into use prior to first occupation of the relevant block. Six months following the first occupation of that block, evidence that the solar PV arrays have been installed correctly and are operational shall be submitted to and approved by the Local Planning Authority, including photographs of the solar array, installer confirmation, an energy generation statement for the period that the solar PV array has been installed, and a Microgeneration Certification Scheme certificate.

(c) Within six months of first occupation, evidence shall be submitted to the Local Planning Authority that the development has been registered on the GLA's Be Seen energy monitoring platform.

REASON: To ensure the development reduces its impact on climate change by reducing carbon emissions on site in compliance with the Energy Hierarchy, and in line with London Plan (2021) Policy SI2, SI3, and Local Plan Policy SP4 and DM22.

- Changes are required as a 15% improvement is only achievable with the Heat Pump scenario. With the DEN connection specified, the energy statement shows that a 10% overall improvement can be achieved. Whilst this is accepted the condition changes require the applicant to show how they have maximised the reduction to attempt to achieve 15%. Changes as follows:

The revised wording is:

21. Energy Strategy

The development hereby approved shall be constructed in accordance with the Sustainability & Energy Statement Revision P04 prepared by Buro Happold (dated 30 Nov 2023) delivering a minimum 10% improvement on carbon emissions over 2021 Building Regulations Part L, with SAP10.2 emission factors, high fabric efficiencies, DEN connection, and a minimum 65 kWp solar photovoltaic (PV) array. (More options to improve the fabric energy efficiency shall be explored in the Energy Strategy in order to justify the reported percentage and indicate how the applicant has attempted to achieve a 15% reduction).

(a) Prior to above ground construction, details of the Energy Strategy shall be submitted to and approved by the Local Planning Authority. This must include:

- Confirmation of how this development will meet the zero-carbon policy requirement in line with the Energy Hierarchy;
- Confirmation of the necessary fabric efficiencies to achieve a minimum 5% reduction with SAP10.2 carbon factors; it is advised to improve this aiming for the minimum 15% reduction.
- Details to reduce thermal bridging;
- Explore further ways to minimise the Energy Use Intensity including but not limited to incorporating waste-water heat recovery;
- Location, specification and efficiency of the proposed alternative low carbon heating system (Coefficient of Performance, Seasonal Coefficient of Performance, and the Seasonal Performance Factor), with plans showing the pipework and noise and visual mitigation measures;
- Details of the PV, demonstrating the roof area has been maximised, with the following details: a roof plan; the number, angle, orientation, type, and efficiency level of the PVs; how overheating of the panels will be minimised; their peak output (kWp); and how the energy will be used on-site before exporting to the grid;
- Specification, location of any additional equipment installed to reduce carbon emissions for example MVHR;

(b) The solar PV arrays must be installed and brought into use prior to first occupation of the relevant block. Six months following the first occupation of that block, evidence that the solar PV arrays have been installed correctly and are operational shall be submitted to and approved by the Local Planning Authority, including photographs of the solar array, installer confirmation, an energy generation statement for the period that the solar PV array has been installed, and a Microgeneration Certification Scheme certificate.

(c) Within six months of first occupation, evidence shall be submitted to the Local Planning Authority that the development has been registered on the GLA's Be Seen energy monitoring platform.

REASON: To ensure the development reduces its impact on climate change by reducing carbon emissions on site in compliance with the Energy Hierarchy, and in line with London Plan (2021) Policy S12, S13, and Local Plan Policy SP4 and DM22.

4. Correction to Conditions 22 Overheating (Student Accommodation) in Appendix 01 – Planning Conditions & Informatives:

- Changes are required following the submission of additional information and further comments from the Carbon Management team. Condition currently reads as follows:

22. Overheating (Student Accommodation)

(a) Prior to the commencement of development, an overheating model and report shall be submitted to and approved by the Local Planning Authority. The model

will assess the overheating risk in line with CIBSE TM59 (using the London Weather Centre TM49 weather DSY1-3 files for the 2020s, and DSY1 for the 2050s and 2080s) and demonstrate how the overheating risks have been mitigated and removed through design solutions. These mitigation measures shall be operational prior to the first occupation of the development hereby approved and retained thereafter for the lifetime of the development. Air conditioning will not be supported unless exceptional justification is given.

This report shall include:

- Remodelling of units, communal areas, and corridors based on CIBSE TM59, using the CIBSE TM49 London Weather Centre files for the DSY1-3 (2020s) and DSY1 2050s and 2080s, high emissions, 50% percentile;
- Demonstrating the mandatory pass for DSY1 2020s can be achieved by meaningfully following the Cooling Hierarchy and in compliance with Building Regulations Part O, demonstrating that any risk of crime, noise and air quality issues are mitigated appropriately evidenced by the proposed location, specification and modelling results of the measures;
- Specify the shading strategy, including technical specification and images of the proposed shading feature (e.g. overhangs, Brise Soleil, or external shutters).
- Provide the elevations and sections plans to show where these measures are proposed.
- Include images indicating which sample units were modelled and floorplans showing the modelled internal layout of dwellings.
- A Retrofit Plan; Modelling of mitigation measures required to pass future weather files, clearly setting out which measures will be delivered before occupation and which measures will form part of the retrofit plan; and Confirmation that the retrofit measures can be integrated within the design (e.g., if there is space for pipework to allow the retrofitting of cooling and ventilation equipment), setting out mitigation measures in line with the Cooling Hierarchy;
- Confirmation who will be responsible to mitigate the overheating risk once the development is occupied.

If the design of development is amended, or the heat network pipes will result in higher heat losses and will impact on the overheating risk of any units, a revised Overheating Strategy must be submitted as part of the amendment application.

REASON: In the interest of reducing the impacts of climate change, to enable the Local Planning Authority to assess overheating risk and to ensure that any necessary mitigation measures are implemented prior to construction, and maintained, in accordance with Policy S14 of the London Plan (2021), and Policies SP4 and DM21 of the Local Plan.

Changes to be made are as follows:

22. Overheating (Student Accommodation)

(a) Prior to the above ground commencement of the development, an updated Overheating Report shall be submitted to and approved by the Local Planning Authority. The submission shall assess the overheating risk and propose a retrofit plan. This assessment shall be based on the Design Note – Overheating Assessment prepared by Buro Happold (dated 07 Dec 2023)

This report shall include:

- Revised modelling of units, communal areas, and corridors based on CIBSE TM59, using the CIBSE TM49 London Weather Centre files for the DSY1-3 (2020s) and DSY1 2050s and 2080s, high emissions, 50% percentile;
- Demonstrating the mandatory pass for DSY1 2020s can be achieved following the Cooling Hierarchy and in compliance with Building Regulations Part O, demonstrating that any risk of crime, noise and air quality issues are mitigated appropriately evidenced by the proposed location and specification of measures;
- If the revised report shows shading is required, to specify the strategy, including technical specification and images of the proposed shading feature (e.g. overhangs, Brise Soleil, or external shutters); Provide the elevations and sections plans to show where these measures are proposed.
- If required details of the active cooling strategy: What is the temperature set points, detail specification of the interrupter controls and who will have the access to the central control?
- Include images indicating which sample units were modelled and floorplans showing the modelled internal layout of dwellings.
- A Retrofit Plan; Modelling of mitigation measures required to pass future weather files, clearly setting out which measures will be delivered before occupation and which measures will form part of the retrofit plan; and Confirmation that the retrofit measures can be integrated within the design (e.g., if there is space for pipework to allow the retrofitting of cooling and ventilation equipment), setting out mitigation measures in line with the Cooling Hierarchy;
- Confirmation who will be responsible to mitigate the overheating risk once the development is occupied.

(b) Prior to occupation of the development, details of internal blinds to all habitable rooms must be submitted for approval by the local planning authority. This should include the fixing mechanism, specification of the blinds, shading coefficient, etc. Occupiers must retain internal blinds for the lifetime of the development, or replace the blinds with equivalent or better shading coefficient specifications.

(c) Prior to occupation, the development must be built in accordance with the approved overheating measures and retained thereafter for the lifetime of the development:

- Openable windows, maximum opening angle of 45 degrees (top hung)
- Recessed windows with min. reveal width of 200mm, increasing to 300mm at the lintel.
- Glazing g-value of 0.3 and visible light transmittance (VLT) of 0.6
- Internal blinds

- MVHR with ventilation rate of 15l/s for bedrooms, 12l/s for KLD and amenity space and 1 Air change per hour for internal corridors.
- Active cooling – only bedrooms (centrally controlled with high temperature set points to limit use and interrupter controls to prevent the system from activation when windows are open)
- Hot water pipes insulated to high standards.
- Any further mitigation measures as approved by or superseded by the latest approved Overheating Strategy.

If the design of Blocks is amended, or the heat network pipes will result in higher heat losses and will impact on the overheating risk of any units, a revised Overheating Strategy must be submitted as part of the amendment application.

REASON: In the interest of reducing the impacts of climate change, to enable the Local Planning Authority to assess overheating risk and to ensure that any necessary mitigation measures are implemented prior to construction, and maintained, in accordance with London Plan (2021) Policy SI4 and Local Plan (2017) Policies SP4 and DM21.

5. Deletion of Condition 33 Written scheme of historic building investigation (PRE-COMMENCEMENT) in Appendix 01 – Planning Conditions & Informatives. The condition reads as follows:

33. Written scheme of historic building investigation (PRE-COMMENCEMENT)

No demolition shall take place until a written scheme of historic building investigation (WSHBI) has been submitted to and approved in writing by the local planning authority. For buildings that are included within the WSHBI, no demolition or development shall take place other than in accordance with the agreed WSHBI, which shall include a statement of significance and research objectives, and the following:

- a) The programme and methodology of historic building investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works; and
- b) The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material. This part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the WSHBI.

The development shall be carried out in accordance with the approved details.

REASON: Built heritage assets on this site will be affected by the development. The planning authority wishes to secure building recording in line with NPPF, and publication of results, in accordance with Section 12 of the NPPF

- This condition was included at the request of the Greater London Archaeology Advisory Service (GLAAS). However, it is already covered by Condition 4 (Photographic survey) and the survey work required by the LBC and is not required.

- The deletion would mean that Condition 34 Land Contamination would now be numbered Condition 33, with all following condition numbers reduced by 1.

6. Further comments were received from the Carbon Management team following the submission of a Design Note by the applicant. The updated comments are as follows:

Carbon Management Response 11/12/2023

In preparing this consultation response, we have reviewed:

- Design Note – Overheating Assessment prepared by Buro Happold (dated 7 Dec 2023)
- Thermal Results spreadsheet for all weather files.
- Relevant supporting documents.

1. Summary

The design note - overheating assessment adequately assess the overheating risks throughout the development following the cooling hierarchy and have modelled against future weather files. The assessment has minimised heat gains through passive measures (proposed façade design, glazing areas, window reveals, glazing g-value) which will be supplemented by active cooling. The assessment also models external shading (horizontal louvers), however this is not proposed as the report suggests it having detrimental impacts on the energy performance with increase in energy demand which the report says outweighs the benefits from the reduction of cooling demand. Overall, the applicant has proposed a mixed strategy of natural ventilation and active ventilation for the students' bedrooms.

Appropriate conditions have been recommended.

2. Overheating

The applicant has submitted a revised dynamic thermal modelling assessment in line with CIBSE TM59 with TM49 weather files, and the cooling hierarchy has been followed meaningfully. The report has modelled 278 habitable rooms, 3 KDL spaces, 1 amenity spaces and 2 corridors.

The revised overheating assessment shows the rooms and spaces pass the weather files solely based upon natural ventilation. However, due to the acoustic constraints of the site, the TM59 criteria for predominantly mechanically ventilated dwelling apply (assuming the windows need to remain closed).

Results are listed in the table below.

	TM59 – criterion A (<3% hours of overheating)	TM59 – criterion B (hours >26°C (pass <33 hours))	Number of KLD pass TM52	Number of amenities pass TM52	Number of corridors pass
Natural Ventilation with closed at night.					
DSY1 2020s	268/269	27/269	4/4	1/1	0/2
DSY2 2020s	59/269	0/269	0/4	0/1	
DSY3 2020s	35/269	0/269	0/4	0/1	
DSY1 2050s	70/269	0/269	1/4	0/1	
DSY1 2080s	0/269	0/269	0/4	0/1	
Mechanical Ventilation with 15l/s					
DSY1 2020s	0/269	0/269			0/2
Active Cooling (Bedrooms only) not modelled but assumed to pass					
DSY1 2020s	269/269	269/269			

All rooms and spaces pass the overheating requirements for 2020s DSY1. In order to pass this, the following measures will be built:

- Natural ventilation, maximum opening angle of 45 degrees (top hung)
- Recessed windows with min. reveal width of 200mm, increasing to 300mm at the lintel.
- Glazing g-value of 0.3 and visible light transmittance (VLT) of 0.6
- Internal blinds
- MVHR with ventilation rate of 15l/s for bedrooms, 12l/s for KLD and amenity space and 1 Air change per hour for internal corridors.
- Active cooling – only bedrooms (centrally controlled with high temperature set points to limit use and interrupter controls to prevent the system from activation when windows are open)

The submitted overheating strategy is considered acceptable.

3. Planning Conditions

Revised wording for overheating (student accommodation).

Overheating (Student Accommodation)

(a) Prior to the above ground commencement of the development, an updated Overheating Report shall be submitted to and approved by the Local Planning Authority. The submission shall assess the overheating risk and propose a retrofit plan. This assessment shall be based on the Design Note – Overheating Assessment prepared by Buro Happold (dated 07 Dec 2023)

This report shall include:

- *Revised modelling of units, communal areas, and corridors based on CIBSE TM59, using the CIBSE TM49 London Weather Centre files for the DSY1-3 (2020s) and DSY1 2050s and 2080s, high emissions, 50% percentile;*
- *Demonstrating the mandatory pass for DSY1 2020s can be achieved following the Cooling Hierarchy and in compliance with Building Regulations Part O, demonstrating that any risk of crime, noise and air quality issues are mitigated appropriately evidenced by the proposed location and specification of measures;*
- *If the revised report shows shading is required, to specify the strategy, including technical specification and images of the proposed shading feature (e.g. overhangs, Brise Soleil, or external shutters); Provide the elevations and sections plans to show where these measures are proposed.*
- *If required details of the active cooling strategy: What is the temperature set points, detail specification of the interrupter controls and who will have the access to the central control?*
- *Include images indicating which sample units were modelled and floorplans showing the modelled internal layout of dwellings.*
- *A Retrofit Plan; Modelling of mitigation measures required to pass future weather files, clearly setting out which measures will be delivered before occupation and which measures will form part of the retrofit plan; and Confirmation that the retrofit measures can be integrated within the design (e.g., if there is space for pipework to allow the retrofitting of cooling and ventilation equipment), setting out mitigation measures in line with the Cooling Hierarchy;*
- *Confirmation who will be responsible to mitigate the overheating risk once the development is occupied.*

(b) Prior to occupation of the development, details of internal blinds to all habitable rooms must be submitted for approval by the local planning authority. This should include the fixing mechanism, specification of the blinds, shading coefficient, etc. Occupiers must retain internal blinds for the lifetime of the development, or replace the blinds with equivalent or better shading coefficient specifications.

(c) Prior to occupation, the development must be built in accordance with the approved overheating measures and retained thereafter for the lifetime of the development:

- *Openable windows, maximum opening angle of 45 degrees (top hung)*
- *Recessed windows with min. reveal width of 200mm, increasing to 300mm at the lintel.*
- *Glazing g-value of 0.3 and visible light transmittance (VLT) of 0.6*
- *Internal blinds*

- MVHR with ventilation rate of 15l/s for bedrooms, 12l/s for KLD and amenity space and 1 Air change per hour for internal corridors.
- Active cooling – only bedrooms (centrally controlled with high temperature set points to limit use and interrupter controls to prevent the system from activation when windows are open)
- Hot water pipes insulated to high standards.
- Any further mitigation measures as approved by or superseded by the latest approved Overheating Strategy.

If the design of Blocks is amended, or the heat network pipes will result in higher heat losses and will impact on the overheating risk of any units, a revised Overheating Strategy must be submitted as part of the amendment application.

REASON: In the interest of reducing the impacts of climate change, to enable the Local Planning Authority to assess overheating risk and to ensure that any necessary mitigation measures are implemented prior to construction, and maintained, in accordance with London Plan (2021) Policy SI4 and Local Plan (2017) Policies SP4 and DM21.