

Seven Sisters Road Warehouse District Gateway

Local Planning Authority: Haringey

Local Planning Authority reference: HGY/2023/0728

Strategic planning application stage 1 referral

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008.

The proposal

Mixed use development comprising the construction of two new buildings over 4 and 8-storeys to provide warehouse living accommodation (Sui Generis) with cafe and employment workspace / artist studio uses, together with public realm and landscaping improvements.

The applicant

The applicant is **Prowell** and the architect is **Morris + Company**

Strategic issues summary

Land use principles: The proposed warehouse living accommodation within an identified Warehouse Living District is acceptable and accords with the Haringey Local Plan policy on warehouse living. The proposal for a high quality new build warehouse living building on vacant land within the district is therefore supported in strategic planning terms.

Internal quality: The overall quality of the proposed warehouse living accommodation is acceptable with good levels of provision of communal kitchens and living spaces linked to clusters of bedrooms on each floor and generous 3.5 metre floor to ceiling heights proposed.

Affordable housing: The application is following the Viability Tested Route. No cash in lieu payment towards off-site affordable housing is proposed, as the applicant states that this is not viable. The GLA's in-house viability team are scrutinising the applicants FVA. Early and late stage viability reviews should be secured.

Urban design and heritage: The overall layout, design, landscaping, height and massing and architectural and materials quality is supported. The scheme would not harm any designated heritage assets.

Transport: Public realm and healthy streets improvements are welcomed. However, further work is required on the active travel arrangements and facilities to ensure compliance with the London Plan. Mitigation via condition, S106 and S278 agreements will be revised and revisions to the scheme will be necessary in relation to cycle parking provision.

Climate change and environment: The energy, urban greening and drainage strategy is supported, subject to key details being secured.

Recommendation

That Haringey Council be advised that the application does not yet fully comply with the London Plan for the reasons set out in paragraph 94. However, possible remedies set out in this report could address these deficiencies.

Context

1. On 28 April 2023 the Mayor of London received documents from Haringey Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008, the Mayor must provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.
2. The application is referable under the following Category/categories of the Schedule to the Order 2008:
 - *Category 1C: "Development which comprises or includes the erection of a building of...more than 30 metres high and is outside the City of London."*
3. Once Haringey Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or, allow the Council to determine it itself.
4. The Mayor of London's statement on this case will be made available on the GLA's public register: <https://planning.london.gov.uk/pr/s/>

Site description

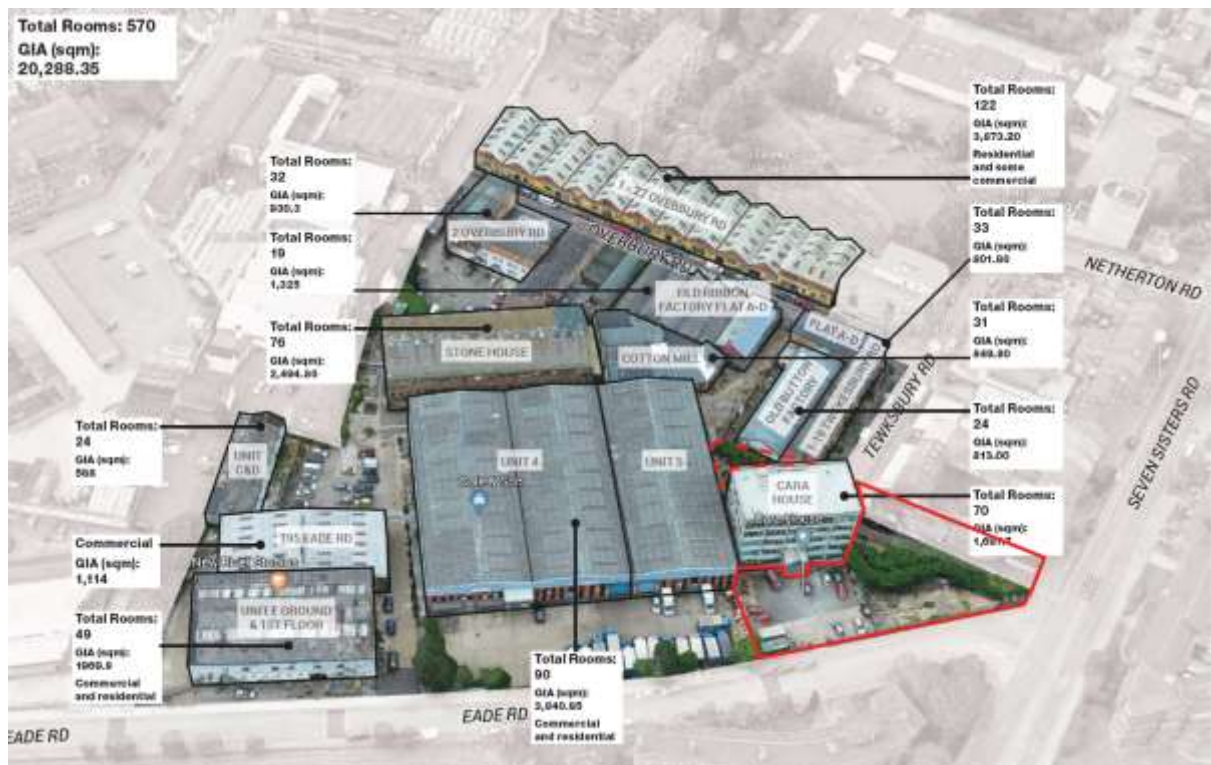
5. The site is 0.23 hectares in size and is located on the corner of Seven Sisters Road and Eade Road. Currently, the site comprises vacant steeply sloping land on the corner of Eade Road and Seven Sisters Road as well as areas of hard-standing to the front and rear of Cara House. Also included within the site boundary is the basement of 341-343 Seven Sisters Road which is accessed to the rear on Tewkesbury Road and the existing pedestrian alleyway which links Tewkesbury Road up to Seven Sisters Road.
6. The site falls within a designated Warehouse Living District in the Local Plan, as set out in more detail below. Overall, the wider district supports a large warehouse living population with approximately 570 existing rooms. This includes the adjacent Cara House (70 rooms), a number of warehouse buildings along 1-27 Overbury Road, along with the Old Button Factory, Stone House and the Old Ribbon Factory. These premises which fall outside the application boundary are also understood to be owned and managed by the applicant Provewell. The adjacent units 4 and 5 below are in employment use. An aerial view of the site boundary and wider context is shown below.
7. The site is not within a conservation area and does not include any statutory or locally listed buildings or structures. The Stoke Newington Reservoirs, Filter Beds and New River Conservation Area is to the south. Ann's Conservation Area is circa 500 metres to the north and includes a number of statutory listed buildings. South Tottenham High Road Conservation Area is to the east. Finsbury Park is to the west and is a Registered Park and Garden (Grade II).

The closest listed building is the Woodberry Down Community JMI School on Woodberry Grove, which is Grade II listed.

Figure 1 – aerial view of the site boundary and individual parcels of land



Figure 2 – warehouse living context



8. The site has a Public Transport Access Level (PTAL) of 5 on a scale of 0 to 6b, where 6b is the highest. The nearest station is Stamford Hill which is approximately 730 metres to the east of the site and provides access to London Overground services between Liverpool Street and Enfield Town. Manor House London Underground Station is approximately 850 metres to the west of the site and provides access to Piccadilly Line services. There are 4 bus stops within walking distance of the site which provide access to Routes 253, 254, 259 and 279. Also further afield is Seven Sisters London Underground Station which is 1.2 kilometres walking distance to the east and provides access to the Victoria Line. Haringey Green Lanes Station is also within 1.5 kilometres walking distance to the west and provides access to London Overground services between Barking and Gospel Oak.
9. The Victoria Line London Underground line runs adjacent to the site beneath Seven Sisters Road and is subject to asset protection. The A503 Seven Sisters Road to the east forms part of the Transport for London Road Network (TLRN). The closest section of the Strategic Road Network (SRN) is the A107 Amhurst Park which is approximately 50 metres to the south of the site. Cycleway 1 (C1) is approximately 700 metres to the east of the site, is the nearest part of the current strategic cycle network which runs between the City to Enfield.

Details of this proposal

10. The application seeks full planning permission for the mixed use development comprising:
 - the construction of two new buildings over 4 and 8-storeys to provide warehouse living accommodation (Sui Generis) with a total of 101 rooms and associated internal and external amenity space and facilities (4,070 sq.m. GEA);
 - ground floor cafe / workspace uses fronting Eade Road and Seven Sisters Road in Class E use;
 - the erection of 10 stacked shipping containers (two storeys) to provide workspace/ artist studios (Class E) which would be accessed on Tewkesbury Yard to the rear; and
 - associated cycle parking, refuse, public realm and landscaping improvements.

Case history

11. No GLA pre-application meeting was undertaken on the scheme as it was not at that stage clear that the referral height threshold would be triggered. However, since the Stage 1 referral, the applicant has engaged GLA and TfL officers by providing a presentation on the scheme by the project architect and a site visit and tour of the Warehouse Living District. Both meetings were attended by the Council planning case officer.

Strategic planning issues and relevant policies and guidance

12. For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the Development Plan in force for the area comprises the Haringey Strategic Policies DPD (2017); Development Management DPD (2017); Site Allocations DPD (2017); and the London Plan 2021.
13. The following are also relevant material considerations:
 - The National Planning Policy Framework, National Planning Practice Guidance, National Design Guide and Written Ministerial Statements
 - Haringey Council, St Ann's Conservation Area Character Appraisal (2009)
14. The relevant issues, corresponding strategic policies and guidance (supplementary planning guidance (SPG) and London Plan guidance (LPG), are as follows:
 - Land use principles London Plan;
 - Urban design, heritage and strategic views London Plan; Housing SPG; Character and context SPG; Public London Charter LPG; London View Management Framework SPG;
 - Inclusive access London Plan; Accessible London: Achieving an Inclusive Environment SPG;
 - Transport London Plan; the Mayor's Transport Strategy; Sustainable Transport, Walking and Cycling LPG.
 - Climate change and sustainable development London Plan; the London Environment Strategy; The control of dust and emissions in construction SPG; Circular Economy Statements LPG; Whole-life Carbon Assessments LPG; 'Be Seen' Energy Monitoring LPG; Urban Greening Factor LPG; Air Quality Neutral LPG; Air Quality Positive LPG;

Land use principles

Local Plan Policy Context: Warehouse Living

15. The site falls within a wider site allocation (SA23) for warehouse living as defined in the Haringey Local Plan. Warehouse living is a bespoke type of shared living and working. It is a type of non-self-contained housing in Sui Generis use that is made up of private rooms and communal living, dining and working spaces as well as other shared facilities, eg. laundry facilities.
16. Haringey Local Plan recognises that warehouse living is a particular form of land use which has emerged over time in Haringey which supports the creative industries sector. It sets out a plan-led policy framework for accommodating

warehouse living on specifically identified sites at a limited number of selected Local Employment Areas / Regeneration Areas in Seven Sisters / South Tottenham. Local Plan Policy DM39 supports proposals for warehouse living in these specified locations and states that it will be resisted elsewhere in the borough. The policy aims to:

- regularise / legitimise warehouse living in these areas;
- support the existing creative industries and SME sectors and ensure that the creative living and working offer of these sites is maximised;
- ensure that existing and future occupants are provided with an appropriate standard of living; and
- secure a long-term sustainable economic future for these sites and development which builds on and complements the unique character of the area.

17. As noted in Local Plan Policy DM39, warehouse living is not classified as 'live / work' accommodation; there is no requirement for tenants to work in the buildings, although this is encouraged.

18. There are a number of similarities between warehouse living and large-scale purpose-built shared living accommodation in terms of the layout arrangement of communal kitchen and dining facilities linked to private rooms. However, the product is clearly distinct from large-scale purpose-built shared living accommodation schemes which are covered by London Plan Policy H16 for the following reasons:

- **Design and layout** – There are a number of differences in terms of design and layout of the accommodation, including:
 - Individual bedrooms do not include en suite toilets or kitchenettes and communal toilets / bathrooms are provided which are shared by residents living within the individual clusters.
 - The scheme comprises a mix of single bedrooms for individuals and double bedrooms for couples.
 - Taller floor to ceiling heights are proposed which enable mezzanine bedrooms (between 3.1 and 3.5 metres). This approach ensures a larger volume of internal space and sense of space, as well as the opportunity to work within the bedroom.
- **Flexibility / adaptability** – A light touch / basic shell fit-out specification is proposed with fitted kitchens and bathrooms only. This seeks to allow residents to furnish living spaces themselves and personalise internal and external the communal areas as well as ensure flexibility to enable a wide range of activities within communal spaces.
- **Management** – Similarly, a more light-touch management is proposed which allows community to self-manage the spaces of communal spaces.
- **Affordability** - maintaining the affordability of the rooms in market rent is a key element of warehouse living product and an important way of

maintaining the area's attractiveness to a wide range of potential residents working in a variety of creative and other industries.

- **Planning policy context** – in this case, Haringey Council has a bespoke plan-led approach, as summarised above. The applicant and Council has been preparing a warehouse District Framework Document which is expected to set out standards for warehouse living in the area.

19. For the above reasons, GLA officers therefore conclude that it would not be appropriate to apply London Plan Policy H16 (Large-scale purpose-built shared living) to the application or the emerging draft London Plan Guidance.

Warehouse living conclusion

20. The proposed warehouse living accommodation in this location is acceptable and accords with the Haringey Local Plan policy on warehouse living within an identified Warehouse Living District. The proposal for a high quality new build warehouse living building on vacant land within the district is therefore supported in strategic planning terms.

Employment provision and affordable workspace

21. The site allocation also overlaps with a designated Local Employment Area (LEA). Local Plan Policy DM38 seeks to ensure that development within LEAs maximises the provision of employment floorspace as part of mixed use schemes and also improves the suitability of a site for continued employment and business use, make provision for affordable workspace and avoid conflicts with nearby employment sites or other land uses.
22. The proposals include 514 sq.m. of mixed commercial uses within the lower floors of Buildings A and B and in former shipping containers within lower floors of 341 and 343 Seven Sisters Road facing onto Tewkesbury Road. It is envisaged that this mixed floorspace will provide accommodation as workspaces, artist studios and cafe space for warehouse residents and the wider community.
23. Affordable workspace is proposed, in line with Local Plan Policy DM38 and DM39. This should be appropriately secured via S106 agreement.

Quality of accommodation

24. The internal layout of the large block comprises clusters of approximately 12 to 14 bedrooms along a corridor linked to large two-storey communal kitchen/dining and living rooms with external balconies and mezzanine levels. The smaller block to the west comprises clusters of 8 bedrooms linked to kitchen/dining and living rooms on each floor. This layout approach is shown in the section and visualisation below.



25. Within the larger block, communal spaces would range from 40 to 50 sq.m. in terms of their overall footprint. Additional volumetric space provided through the use of split mezzanine spaces. Where these are proposed the overall height of the double height spaces would therefore range up to 7 metres in height in total, with each individual floor comprising 3.5 metre floor to ceiling. This design approach is strongly supported.
26. All of the communal kitchen spaces would have good access to daylight and sunlight, with very generous glazing and floor to ceiling heights proposed as well as openable windows and terraces. Each communal amenity space would face south / east, north-east, with deep projecting balconies and roof terrace areas provided to avoid overheating and allow direct access to outside space and passive ventilation. In the smaller block the communal kitchens would be on every floor and sized at circa 40 sq.m., with south facing balconies attached.



27. In terms of the ratio and distribution of communal kitchens per resident, the scheme would ensure 1.3 sq.m. of kitchen space per occupant with convenient access provided with between up to 12 bedrooms sharing the same kitchen.
28. The overall quantum of internal communal space per resident would be of a good standard, with 581 sq.m. proposed in total which equates to 5.3 sq.m. per resident at full occupancy.
29. The provision of external amenity is also of an acceptable standard. In total, 314.5 sq.m. of external outside space is proposed in the form of balconies and roof terraces. This would equate to a ratio of 2.4 sq.m. per resident.
30. In terms of room size, a variety of bedroom sizes are proposed ranging from approximately 8 to 10 sq.m. for single bedrooms and 12 to 13 sq.m. for double bedroom. Whilst bedroom sizes are on the small side, it is important to note that communal toilets and bathrooms are proposed for all units within the corridors which would be easily accessed by all occupants and no kitchenettes are proposed within rooms. Consequently, the room sizes are below the recommended levels advised in the Mayor's London Plan Guidance on purpose built shared living accommodation.
31. The overall volume of space within the bedrooms is also relevant. All of the bedrooms within the scheme would have 3.5 metre floor to ceiling heights providing the opportunity for double height spaces and the introduction of a deck bed space with workspace / living space below.
32. The communal kitchens would include an appropriate range of equipment and facilities for the intended number of residents. This includes worktops, sinks, cookers, hobs, cold and dry storage and laundry facilities. It is understood that these spaces and facilities would be designed in accordance with the emerging Warehouse Living Framework. Further information on this issue will be scrutinised at Stage 2. It is recommended that the provision of an appropriate range of facilities in line with the agreed warehouse living standards should be secured.
33. Dedicated separate workspace for occupants is proposed at lower floor units and former shipping containers. The ability to work would also be facilitated within the communal kitchen / living spaces.
34. In summary, the overall quality of the proposed warehouse living accommodation is considered to be of an acceptable quality with good levels of provision of communal kitchens and living spaces linked to clusters of bedrooms on each floor and generous 3.5 metre floor to ceiling heights proposed. The internal design and layout is therefore supported.

Affordable housing

35. As with purpose built shared living accommodation in Sui Generis use, it would not be appropriate for any of the proposed bedrooms to be provided as affordable housing, given that the homes do not comply with minimum space standards for Class C3 housing. However, a cash in-lieu financial contribution

towards affordable housing off-site would normally be expected, as is the case for purpose-built shared-living schemes.

36. The application is following the Viability Tested Route. A Financial Viability Appraisal (FVA) has been submitted which will be scrutinised by the GLA's in-house viability team and comments relating to viability will be provided separately in due course. Early and late stage viability reviews will be required in line with the Viability Tested Route and London Plan Policy H5.
37. Currently, the applicant's FVA concludes that the scheme makes a negative net residual return and, consequently, it is the applicant's position that the proposals cannot support a financial contribution towards off-site affordable housing. This will need to be scrutinised by GLA officers and commented on prior to Stage 2.
38. As noted above, the applicant has stated that the aim is to ensure that the market rent rooms on the scheme are as affordable as possible, given the particular characteristics of the Warehouse Living District. The applicant has stated that existing rents charged in the Warehouse Living District which range from £550 to £1,000 a month per room. The applicant is currently assuming that the proposed warehouse living rooms would be let at rental levels at around £950 a month per room, including service charges. This reflects the new build nature of the proposed scheme. GLA officers note that £950 a month is broadly comparable to a London Living Rent level for the ward in question, albeit a like for like comparison cannot be made given the comments above.
39. Given that these are market rents and could be increased over time, GLA officers would welcome further discussion on how caps can be incorporated within the S106 agreement to ensure the affordability of the market rent levels and service charges.

Agent of Change

40. The application does not raise any particular strategic planning concerns regarding the agent of change principle, taking into account the established nature of the existing Warehouse Living District and noting the proposed design and layout relative to the existing and surrounding employment context. This is subject to an appropriate delivery and servicing strategy being secured, together with suitable noise mitigation measures.

Urban design and heritage

Design, layout and landscaping

41. The layout and design of the scheme responds appropriately to the opportunities and constraints. Block A would create a new attractive landmark building marking the gateway into the Warehouse Living District to the rear. The existing alleyway route down to Tewkesbury Road would be widened and substantially improved with attractive landscaping and active frontages proposed lining this route in the form of a cafe with the potential for outdoor

seating. Additional overlooking would be provided by the warehouse living communal terraces, living rooms and balconies above. Whilst the gradients of the alleyway cannot be substantially revised due to the width and space constraints, the proposed approach is considered to optimise the potential for improvements along this route.

42. The ground floor uses lining Eade Road would be consistently designed with attractive green detailing and 4.1 metre high commercial openings. The layout of the two blocks would be split to create a new entrance into 'Cara Yard' to the rear where communal entrances to the warehouse living accommodation and cycle parking facilities would be created. The shipping containers would be located on Tewkesbury Road at lower levels. This would respond appropriately to the industrial character present on this part of the site. Two local design review (QRP) meetings have been undertaken and it is noted that the QRP is supportive of the proposed design. Overall, GLA officers consider the layout and design of the scheme to be well-considered and would accord with the principles set out in London Plan Policies D3, D5, D8.

Height and massing

43. The site does not fall within the potential locations which are considered appropriate for tall buildings in the Haringey Local Plan (Policy DM6, Figure 2.2). The Local Plan includes the following definitions in relation to tall and taller buildings. Taller buildings are defined as those that are two to three storeys higher than the prevailing surrounding building heights. Tall buildings are defined in the Strategic Policies Local Plan as being buildings 10 storeys and over.
44. The application proposes the construction two new buildings over 4 and 8-storeys. Therefore, based on the Local Plan definition, the proposed scheme would be classified as a taller building rather than a tall building and, as such, London Plan Policy D9 is not engaged.
45. The height and massing of the scheme is supported. The massing, form and articulation of the buildings is considered to be successful in terms of the immediate and surrounding townscape context and topography. The proposals would optimise the development potential of the site, providing a new attractive landmark building at the junction of Seven Sisters Road and Eade Road, marking the gateway of the Warehouse Living District.

Architectural and materials quality

46. The architectural design and materiality of the proposed scheme is supported. The proposed buildings would have a distinctive and cohesive overall appearance which responds positively to the surrounding industrial and residential character of the area. Robust and durable materials are proposed in the form of light weight ribbed and routed cement boards are proposed, along with aluminium cladding, masonry and corrugated metal. A range of grey tones are proposed, alongside green metal and cladding, which is used at the base, fenestration and top of the building.

47. The elevational design is successful, with ribbed panels and windows organised in a way to create a simple but irregular appearance. Good levels of detailing and depth is proposed through the use of ribbed and undulating features on the solid elements of the elevations and perforated metal brise solei. These would work together to create shadows and visual interest.
48. A particularly strong architectural character proposed for the taller Block A which would feature distinctive large double height windows and characterful smaller circular porthole windows. The overall architectural and materials approach is strongly supported and complies with London Plan Policy D3 and D4.



Strategic views

49. The potential impact on LVMF View 1A has been assessed as part of the applicant's Townscape Heritage and Visual Impact Assessment (THVIA). This shows that the proposals would be partially visible in the distant background of the view alongside other large and tall buildings in the panorama. The proposals would be largely screened from view in the summer time due to the location of mature trees. There would be no impact on the strategic landmark (St Pauls) or any of the other landmark features listed in the London View Management Framework SPG. The application does not conflict with London Plan Policy HC3 and HC4.

Heritage

50. Having reviewed the applicant's THVIA and having reviewed the site location, surrounding context and the height, massing and appearance of the proposals, GLA officers consider that the scheme would not harm any designated heritage assets.

Fire safety

51. A fire statement has been prepared by a third party suitably qualified assessor and submitted as part of the planning application, as required by London Plan Policy D12. This covers a range of fire safety related matters including: building materials and construction; means of escape and evacuation; fire safety systems (including suppression, detection and alarm systems) and smoke control measures; measures to prevent fire spread in terms of external walls; and fire brigade access and facilities. Sprinkler protection is proposed throughout the building.
52. The scheme provides an additional secondary external escape stair in Block A which is covered by mesh screening and would be available to both buildings, with Block B accessing the escape stair via bridge links on each floor. An evacuation lift is proposed in each block, in line with London Plan Policy D5.
53. GLA officers note that the Health and Safety Executive has responded to the public consultation citing some concern regarding design details of the proposals (mainly relating to fire service access and means of escape), which will need to be responded to and addressed by the applicant. An updated on this will be provided at Stage 2.

Inclusive access

54. Of the proposed warehouse living bedrooms, 10% would be designed to be suitable for wheelchair users. Step-free level access would be provided throughout both buildings internally, together with means of disabled evacuation from the building in the form of an evacuation lift. The main site constraints relating to topography and gradients between Seven Sisters Road and Tewkesbury Road have been appropriately addressed, taking into account the physical constraints. Two new lifts would be provided on Tewkesbury Road to provide access to mezzanine levels within Block A and the shipping container element of the scheme. On street blue badge parking is proposed in line with the London Plan.
55. The potential to improve the existing alleyway to a more appropriate gradient has been explored but has been discounted as unviable given the length of ramp required (165.5 metres). However, this route would be significantly improved with a combination of steps, levels sections, increased width, landscaping and a wheeling ramp for bikes and goods. The width would increase from 1.5 metres at present, to between 13 and 3 metres at its narrowest point. This is considered acceptable, given the existing constraints and site circumstances. The scheme is compliant with London Plan Policy D5.

Transport

Trip generation

56. The proposed trip generation and mode share assessment is acceptable in strategic transport terms.

Public realm improvements and Healthy Streets works

57. The proposed public realm improvements surrounding the site are supported. Currently, the public realm adjacent to the site between Seven Sisters Road and Tewksbury Road is a narrow, poorly lit alleyway which is not welcoming to users. The applicant is working with the LB of Haringey to improve the route which acts as a gateway to the wider Warehouse District. As noted above, improvements include widening the alleyway, providing improved lighting, active frontages and cyclist facilities along the alleyway. This is strongly supported, in line with the Mayor's Healthy Streets principles.
58. In addition to this, the applicant is proposing healthy streets works including a pocket park to the end of Tewkesbury Road nearest their site which is welcomed. In order to support the delivery of this and overall design quality of the public realm, it is requested that the LB of Haringey revise the on-street parking and loading controls. The applicant also appears to be proposing works to Seven Sisters Road which form part of the TLRN but limited detail is provided.
59. The applicant should engage with TfL Infrastructure Protection to ensure any changes to the gradient of the alleyway would not unduly impact on the LU infrastructure beneath Seven Sisters Road. Additionally, any works to the TLRN on Seven Sisters Road require agreements with TfL and should be secured via s278 agreement. The applicant should refer to TfL Streetscape Guidance when proposing works on TfL highway and TfL wider Streets Toolkit. Further details are required and discussion with TfL as to the acceptability of the proposals prior to determination.
60. The site is approximately 700 metres to the west of Cycleway 1. The applicant should work with TfL and LB of Haringey to improve links between the site and this Cycleway and the walking routes to Stamford Hill for pedestrians. This is in accordance with Policy T5 of the London Plan.
61. The applicant should also explore improvements to the crossing of Eade Road at its junction with Seven Sisters Road and onward links to Manor House. There is scope for an improved pedestrian and cyclist crossing of Seven Sisters Road in this location. These improvements would all help mitigate the impact of the development and promote sustainable and active travel, in line with London Plan Policy. They should be secured by s278 agreement with the appropriate authority and/or in the s106.
62. The applicant has provided an ATZ assessment as part of the submission which is welcomed. A night-time ATZ assessment should also be undertaken to identify walking and cycling improvements which may be applicable after dark. There is also scope for improvement of the daytime ATZ and the applicant should work with the relevant highway authority to deliver some of the suggested walking and cycling improvements, in line with the Healthy Streets agenda, TfL may seek site specific mitigation for the wider network in addition to works proposed.

Vehicular access

63. Proposed vehicular access for service vehicles only would be gained via Eade Road, which forms part of the borough highway network. However, the site access point is adjacent to the TfL red route return in which TfL are the traffic authority. Access to the site would be via gates off street. It needs to be demonstrated that these arrangements would not result in queue backs onto Eade Road and Seven Sisters Road.

Pedestrian and cycle access

64. Pedestrian and cyclist access would be from various points including Eade Road, via gates separate to the vehicle access, the improved alleyway leading from Seven Sisters Road and from the rear on Tewkesbury Road. These should be secured by condition/s278 agreement.

Deliveries and servicing

65. The existing building, Cara House adjacent to the site is used for warehouse living units. It does not form part of the application site but falls under the ownership of the applicant. However, it is serviced via the existing car park which does form part of the application site. The application is proposing to provide two servicing bays as part of the development to be shared between Cara House and the new building. The land on which existing car parking used by occupiers of Cara House would be incorporated in the development and the spaces would not be reprovided.
66. The applicant has provided expected delivery and servicing vehicle data which is deemed acceptable and has provided detailed swept path analysis that demonstrates vehicles can enter and egress the site in forward gear. The applicant has also provided cycle parking for the site but has failed to incorporate or highlight potential locations for cargo bike deliveries.
67. Further detail should be provided on the management of the servicing bays and the route between them and the proposed gates on Eade Road.
68. It is also noted that given the site constraints, larger vehicles will have to load and unload on the double yellow lines. TfL notes that this area is in close proximity to the TfL red route return, where TfL are the traffic authority. The applicant should demonstrate that any large vehicles would not impact the network with swept path analysis and identify and agree a suitable loading location with the LB of Haringey. A detailed Delivery and Servicing Plan (DSP) in accordance with TfL guidance, should be secured via condition.

Car parking

69. The proposal is car free apart from on street blue badge parking which is welcomed. The applicant is proposing the conversion of two existing on street parking bays on Eade Road to disabled parking bays. It is requested that the applicant should clarify the proposed location. All future occupiers should be exempt from being able to apply for parking permits.

Cycle parking

70. It is acknowledged that there is no London Plan standard for warehouse living. The applicant considers the cycle parking requirement to be akin to student accommodation. However, TfL considers warehouse living to be more like residential dwellings given the greater length of occupancy, all year round living, and the potential intensification of occupation afforded by the mezzanine layout which is not usually seen with student halls and therefore the dwelling requirements are most applicable.
71. The quantum currently being proposed is 1 long stay space per bedroom. TfL considers that in addition to this that the applicant should provide 1.5 long stay spaces for the double bedrooms. For the commercial elements the proposed long stay spaces should be shown on plans.
72. With regards to short stay cycle parking, the proposal adheres to the minimum London Plan requirements.
73. It is requested that the applicant should re-visit the proposed layout of the provision of long stay cycle parking. It is acknowledged that some residents of adjacent converted buildings store their cycles within their bedroom. However, TfL officers do not accept this as part of the provision of the London Plan quantum and this should be addressed within a new build scheme. The London Plan minimums (at least) should be provided in accordance with the London Cycle Design Standards.

Construction

74. The applicant has provided an Outline Construction Logistics Plan (CLP) as part of the submission document. The document outlines key fundamentals of the construction programme and methodology. Whilst noting further detail will be clarified in a detailed document, post submission, the applicant should demonstrate measures to ensure there will be no impact on London Underground infrastructure. Conditions to protect rail infrastructure will be necessary and provided in more detail.
75. TfL is concerned that any excavation works or below ground works may impact on TfL highway and other assets. TfL Technical Approval maybe required for such works. TfL recommends that any major structural works adjacent to the TLRN are submitted to Structural Technical Approval to assess.

Sustainable development

Energy

76. The energy strategy for the scheme comprises energy efficiency measures, a centralised communal air source heat pump system, supplemented by solar panels at roof top level. The overall strategy is expected to achieve an overall on-site CO2 reduction of 53% over and above baseline minimum Building Regulations requirements. Whilst this exceeds the minimum 35% London Plan requirement for on-site reductions in CO2 emissions, it falls short of achieving the zero carbon target, so mitigation is required in the form of a carbon offset

payment which should be secured in line with the recommended London Plan benchmark price per tonne.

77. The proposed energy efficiency measures comprise optimised glazing ratios and specification; solar shading from protruding brise soleil above windows and communal balconies; fabric measures to limit heat loss and gain; and the provision of a high efficiency mechanical heat and ventilation recovery system (MVHR). The energy strategy suggests that these measures would achieve a CO2 reduction of 27% over and above baseline minimum Building Regulations requirements. This would meet the minimum energy efficiency requirement in the London Plan.
78. Full details of the proposed energy efficiency measures should be secured by condition. In addition, the specification of the proposed ASHP energy system should be secured by condition.
79. Photovoltaic solar panels will be installed on the upper level service roof of Block A which have been integrated into the green roof system creating a bio-solar roof. This is supported. The remainder of the roof is utilised for ASHPs and external communal amenity space for residents. Having assessed the roof plans and development constraints on Block A, GLA officers consider that the provision of solar panels has been maximised on this particular block. However, further clarification should be provided to justify the lack of solar pv proposed on the lower rise Block B.
80. Overheating analysis has been undertaken in accordance with London Plan Policy SI4 and the CIBSE TM59 assessment criteria (including allowance for extreme weather events). The overheating / cooling criteria has been followed. The scheme primarily relies on natural ventilation with side hung openable windows in bedrooms. Communal kitchen/ dining spaces would be dual aspect and served by large openable windows and doors which open out onto balconies to enable cross ventilation during hot weather. Full details of the final overheating strategy should be secured by condition.
81. London Plan Policy SI2 requires the energy performance of completed developments to be monitored, verified and reported following construction ('Be Seen'). This should be secured.

Whole Life Carbon

82. A Whole Life Carbon Assessment has been undertaken in accordance with the London Plan, which takes into account the draft GLA Guidance (2020). This reviews the embodied carbon emissions associated with the proposed development, taking into account the materials quantities and loads, the operational energy consumption of the built scheme, with total emissions estimated and compared to the GLA benchmarks. The report outlines a range of opportunities which could be undertaken to reduce the carbon associated with the development at the more detailed design stage when materials are being selected and specified. This further review should be secured through a pre-commencement condition.

Circular Economy

83. A Circular Economy Statement has been submitted which takes into account the GLA's draft guidance (2020) and outlines how circular economy principles will be incorporated in the design, construction and management of the proposed development, including through minimising materials use and the sourcing and specification of materials; minimising and designing out waste at various stages; and by promoting re-usability, adaptability, flexibility and longevity. This is supported and complies with London Plan Policy SI7. A post-completion report is proposed by the applicant which would provide further details which should be secured via a planning condition.

Digital connectivity

84. A planning condition should be secured requiring the submission of detailed plans demonstrating the provision of sufficient ducting space for full fibre connectivity infrastructure within the development in line with London Plan Policy SI6.

Environmental issues

Urban greening, trees and biodiversity

85. A range of other urban greening measures are proposed as part of the scheme including green roofs, soft landscaping and tree planting within Cara Yard, Tewkesbury Yard and the enhanced stepped alleyway route. The applicant has undertaken an Urban Greening Factor (UGF) assessment which demonstrates that the scheme would achieve a UGF score of 0.35. Overall, GLA officers are satisfied that the potential for urban greening within the site has been maximised, taking into account the site circumstances and constraints.
86. Currently 80% of the site is impermeable. The existing wildlife features on the corner of Eade Road and Seven Sisters Road have been assessed and comprise unmanaged scrub landscaping which is not significant in terms of biodiversity or ecological value. A range of biodiversity enhancements are proposed which would result in an overall biodiversity net gain, in line with the London Plan and NPPF. The application therefore complies with London Plan Policy G5, G6 and G7.

Flood risk and drainage

87. The site is located within Flood Zone 1 and is in an area where the risk of surface water flooding is considered to be low, according to Environment Agency mapping. It is close to the artificial waterway known as the New River with the East Reservoir to the south. The site has a complex topography with levels generally dropping from south to the north-east. There is a level change of circa 7.25 metres from the junction of Eade Road and Seven Sisters Road down to Tewkesbury Road.

88. A range of Sustainable urban Drainage measures are proposed, including blue roofs are proposed for both blocks, permeable paving, rain gardens and soft landscaping. The overall capacity sufficient to cater for the 1 in 100-year storm event, factoring in climate change. This is acceptable. As such, subject to appropriate standard conditions being secured, the proposals are in accordance with London Plan SI12 and SI13.

Noise impacts

89. The applicant's noise assessment shows that noise pollution caused by the road traffic on the adjacent Seven Sisters Road can be effectively controlled and mitigated to ensure an acceptable internal noise level within the building, in line with the British Standard and World Health Organisation guidelines. This requires the adoption of suitable acoustic fabric and glazing specification, which would need to be controlled and secured by condition. The application would therefore comply with London Plan Policy D14.

Air quality

90. An Air Quality Assessment has been provided which shows that the concentrations of NO₂ and PM are below the national air quality objective limits. The warehouse living accommodation would be acceptable in terms of air quality and would not require any specific mitigation measures to avoid potential exposure to poor air quality. The proposed development incorporates Air Source Heat Pumps and is generally car-free (excluding disabled car parking and car club provision). Therefore, it is not expected to give rise to any significant adverse impacts in terms of air quality, subject to appropriate conditions being secured to manage the construction phase. As such, no specific mitigation was considered necessary and the scheme is considered to meet the air quality neutral criteria and generally accord with London Plan Policy SI1.

Local planning authority's position

91. Haringey Council planning officers are currently assessing the application and the application will be considered at a planning committee meeting in due course.

Legal considerations

92. Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged; or, direct the Council under Article 6 of the Order to refuse the application; or, issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of

determining the application (and any connected application). There is no obligation at this stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

Financial considerations

93. There are no financial considerations at this stage.

Conclusion

94. London Plan policies on housing, affordable housing, design, heritage, transport, climate change and the environment are relevant to this application. Whilst the proposal is supported in principle, the application does not fully comply with the London Plan, as summarised below:

- The proposed warehouse living accommodation within an identified Warehouse Living District is acceptable and accords with the Haringey Local Plan policy on warehouse living. The proposal for a high quality new build warehouse living building on vacant land within the district is therefore supported in strategic planning terms.
- **Internal quality:** The overall quality of the proposed warehouse living accommodation is acceptable with good levels of provision of communal kitchens and living spaces linked to clusters of bedrooms on each floor and generous 3.5 metre floor to ceiling heights proposed.
- **Affordable housing:** The application is following the Viability Tested Route. No cash in lieu payment towards off-site affordable housing is proposed, as the applicant states that this is not viable. The GLA's in-house viability team are scrutinising the applicants FVA. Early and late stage viability reviews should be secured.
- **Urban design and heritage:** The overall layout, design, landscaping, height and massing and architectural and materials quality is supported. The scheme would not harm any designated heritage assets.
- **Transport:** Public realm and healthy streets improvements are welcomed. However, further work is required on the active travel arrangements and facilities to ensure compliance with the London Plan. Mitigation via condition, S106 and S278 agreements will be revised and revisions to the scheme will be necessary in relation to cycle parking provision.
- **Climate change and environment:** The energy, urban greening and drainage strategy is supported, subject to key details being secured.

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