

Planning Sub Committee: Wednesday, 17th July 2024, 7.00 pm

ADDENDUM REPORT FOR ITEMS

UPDATE FOR CONSIDERATION AT PLANNING SUB-COMMITTEE Item No. 8

Reference No: HGY/2024/0692	Ward: Bruce Castle (Northumberland Park opposite)
Address: 807 HIGH ROAD, TOTTENHAM, LONDON, N17 8ER	
Proposal: Full planning application for the demolition of existing buildings and the erection of a replacement building of up four storeys to include purpose-built student accommodation (Sui Generis) and flexible commercial, business and service uses (Class E), hard and soft landscaping, and associated works.	
Applicant: High Road West (Tottenham) Ltd. [Tottenham Hotspur Football Club (THFC)].	
Ownership: Private	

1. A change has been made to Section 106 Heads of Terms item number 3 “Affordable housing” on Page 4 of the Public reports pack “the pack”. The change is as follows (the as published is followed by the amended wording with changes underlined and in **bold**):

3) **Affordable housing:**

- at least 35 per cent of the accommodation secured as affordable student accommodation / affordable housing, to be provided on-site or off-site.
- To be provided as affordable student accommodation on-site, or alternatively as affordable housing at a ratio compliant with London Plan provisions (2:5 student = 1 residential) within Site Allocation NT5.
- Affordable accommodation residents to have access to the same communal amenity as the market accommodation.
- To accord with relevant London Plan Policy, its supporting text, and the relevant parts of the Mayor’s Affordable Housing and Viability SPG.
- Should off-site residential affordable housing provision be delivered, unless otherwise agreed this would be provided at 60% intermediate and 40% affordable rented in accordance with the provisions of Policy AAP3 of the Tottenham Area Action Plan. The associated housing mix shall be confirmed through an Affordable Housing Scheme secured by the S106 Agreement.
- **In the event that off-site provision of affordable housing is secured but does not come forward in a timescale agreed with officers then an equivalent payment in lieu of on/off site affordable housing shall be secured.**

- 1.1. The change to the head of term has been proposed in order to deal with the unlikely scenario where off-site provision is secured but does not come forward in an agreed timeframe. In this eventuality a payment in lieu would be sought in order to prevent any delay in the affordable housing benefits of the scheme coming forward.
 - 1.2. Whilst every effort would be made to secure on site provision or off site in NT5 this additional provision allows for a fallback should unforeseen circumstances occur and enable a payment to be secured within an agreed timescale.
2. A change has been made to Section 106 Heads of Terms item number 10 “Initial Carbon Offset Contribution” on Page 7 of the pack. The change is as follows:

10) Initial Carbon Offset Contribution: Amount to be determined in further revised Energy Plan & Sustainability Statement based on connection to DEN (**50%** payable upon commencement **and 50% payable pre-occupation**) plus 10% management fee.

- 2.1. The change to the head of term has been proposed in order to bring the payments of the initial carbon offset contribution in line with the approach which has been established through the agreed S106 for the Printworks (HGY/2023/2306) which is the development under construction near to the site to the north at 819-829 High Road.
- 2.2. The structure in the Printworks is for 50% of the carbon offsetting contribution to be paid on commencement of the development (termed as the “Base Carbon Offsetting Contribution” and captured in para. 8.5 in the Printworks S106) with the remainder (including any adjustment from the sustainability review) being due on completion/occupation (termed as the “Carbon Offsetting Contribution” in the Printworks S106).

3. A change has been made to Condition 18 ‘Energy Strategy’ on Page 56 of the pack following receipt of additional information relating to energy matters. The applicant has submitted a revised Energy & Sustainability Statement (dated 8th July 2024) as well as GLA Carbon Emission Reporting Spreadsheets, heating system diagram, a plan of mechanical and public health services at roof level, and other relevant supporting documents.
- 3.1. The Carbon Management Team have reviewed the additional information and provided comments (See Appendix 1 – Carbon Management Response 16/07/2024). As part of their comments, they have recommended a change to Condition 18.
 - 3.2. The Energy Strategy includes some clarifications requested under previous comments. Whilst the previous position was supported, the revised energy strategy identifies improvements that are closer to policy compliance which have been secured in the revised condition below. The applicant should explore more options to improve the fabric energy efficiency aiming to 15%

reduction under Be Lean and maximise on-site renewable energy generation under Be Green scenario.

18) Energy Strategy

The development hereby approved shall be constructed in accordance with the Energy & Sustainability Strategy by P3R (dated ~~19 February 2024~~ **8 July 2024**) delivering a minimum 86.5% improvement on carbon emissions over 2021 Building Regulations Part L, with high fabric efficiencies, a single point of connection for a future heat network, and solar photovoltaic (PV) array generating a minimum 4,320 kWh/year; and a minimum ~~45%~~ **16%** improvement with a communal heat pump system.

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

- Confirmation of the necessary fabric efficiencies **aiming** to achieve a minimum ~~40%~~ **15%** reduction;
- Improvement in the Fabric Energy Efficiency;
- Methodology and calculation of the space heating demand and energy use intensity, demonstrating how the GLA benchmarks are being met;
- Details to reduce thermal bridging;
- Location, specification and efficiency of the proposed ASHPs (Coefficient of Performance, Seasonal Coefficient of Performance, and the Seasonal Performance Factor), with plans showing the ASHP pipework and noise and visual mitigation measures;
- How the VRF heat pump system is compatible with the DEN;
- Specification and efficiency of the proposed Mechanical Ventilation and Heat Recovery (MVHR), with plans showing the rigid MVHR ducting and location of the unit;
- 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); inverter capacity; and how the energy will be used on-site before exporting to the grid;
- Specification of any additional equipment installed to reduce carbon emissions;
- A metering strategy.

The development shall be carried out strictly in accordance with the details so approved prior to first operation **occupation** and shall be maintained and retained for the lifetime of the development. The solar PV array shall be installed with monitoring equipment prior to completion and shall be maintained at least annually thereafter.

(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, and Local Plan (2017) Policies SP4 and DM22.

4. Members should also be aware that at paragraph 7.108 on page 39 of the pack the report identifies that the assessment of the current application against the Council's legal duties and development plan policies remains as set out in the officer report to Planning Sub-Committee on 12 October 2020 (Which can be found in Appendix 6 to the committee report). Since this date, the revisions to the NPPF mean that the paragraph numbers have changed. However, the assessment remains the same in terms of conserving and enhancing the historic environment.

Appendix 1 – Carbon Management Response 16/07/2024

In preparing this consultation response, we have reviewed:

- Energy & Sustainability Statement prepared by P3R (dated 8th July 2024)
- GLA Carbon Emission Reporting Spreadsheets for DEN and ASHP scenarios
- Ref. 1949/M/1000 Schematic Diagram for Heating System
- Ref. 1949-C-8140 Combined Mechanical and Public Health Services at Roof Floor Plan
- Relevant supporting documents.

Summary

The Energy Strategy includes some clarifications requested above. The applicant should explore more options to improve the fabric energy efficiency aiming to 15% reduction under Be Lean and maximise on-site renewable energy generation under Be Green scenario.

Appropriate conditions have been recommended.

Energy Strategy – Overall

Revised carbon reduction tables are included below.

Site wide	DEN scenario			ASHP scenario		
	Total regulated emissions (Tonnes CO ₂ / year)	CO ₂ savings (Tonnes CO ₂ / year)	Percentage savings (%)	Total regulated emissions (Tonnes CO ₂ / year)	CO ₂ savings (Tonnes CO ₂ / year)	Percentage savings (%)
Baseline	53.6			14.6		
Be Lean	53.0	0.6	1%	13.5	1.7	12%
Be Clean	7.82	45.2	84%	12.9	0	0%
Be Green	7.22	0.6	1%	12.28	0.6	4.1%
Cumulative savings		46.38	86.5%		2.27	16%
Carbon shortfall to offset (tCO₂)	7.22			12.28		

Energy Use Intensity (EUI) / Space Heating Demand (SHD)

The reported EUI and SHD are as follows:

	Proposed Development		GLA Benchmark
	DEN	ASHP	
Building type	Student / Commercial	Student / Commercial	Hotel/All other non-residential
EUI	237.89 kWh/m ² /year	113.17 kWh/m ² /year	Does not meet GLA benchmark of 55 kWh/m ² /year (eq. to hotel)
SHD	27.19 kWh/m ² /year	8.23 kWh/m ² /year	ASHP strategy meets while DEN strategy does not meet the GLA benchmark of 15 kWh/m ² /year
Methodology used	Part L2 - SBEM & none	Part L2 - SBEM & none	

Actions:

- The Energy use intensity is double in the case of ASHP scenario and four time higher than the GLA benchmark. It is recommended to explore measures to reduce this and aim for the GLA benchmark.
- Please provide proper justification on why the proposed building fabric and heating system results into different EUI and SHD for two different scenarios, which is very high than the GLA benchmark.

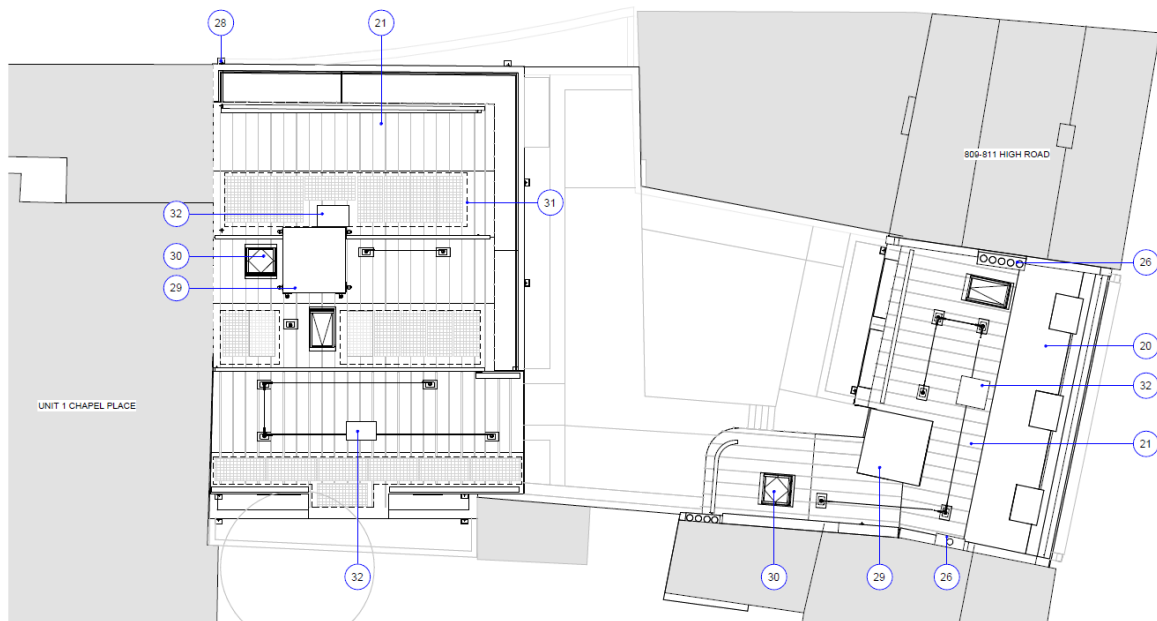
Energy – Lean

The applicant has proposed a saving of 1% in carbon emission under DEN scenario and 12% under ASHP scenario. This goes against the Energy Hierarchy and the requirement to take a fabric first approach in line with London Plan Policy SI2 and Local Plan Policy SP4. However, it is understood that it is challenging for non-residential developments to reach the minimum 15% requirement against new Part L 2021. Therefore, the development is required to maximise improvement in building fabric parameters as much as possible.

Energy – Green

As part of the Be Green carbon reductions, all new developments must achieve a minimum reduction of 20% from on-site renewable energy generation to comply with Policy SP4. The proposed renewable energy generation results in only 4.1% carbon reduction for ASHP scenario and 1.1% for DEN scenario which is not policy compliant. The development must use all the available roof space to maximise on-site renewable energy generation.

The proposed solar PV as follows (31):



Actions:

- Policy SP4 requires all new development to achieve a minimum 20% reduction from on-site renewable energy generation and Policy SI2 requires all new development to maximise on-site renewable energy generation as much as possible. The proposed roof plans shows some available space for solar PV installation. Please provide some commentary on how the available roof space has been maximised to install solar PV.
- What is the peak output of the PV array and assumed inverter capacity?
- How will the solar energy be used on site (before surplus is exported onto the grid)?

Planning Conditions

Revised wording for energy strategy.

Energy Strategy

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(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 **aiming** to achieve a minimum ~~40%~~ **15%** reduction;
- Improvement in the Fabric Energy Efficiency;
- Methodology and calculation of the space heating demand and energy use intensity, demonstrating how the GLA benchmarks are being met;
- Details to reduce thermal bridging;
- Location, specification and efficiency of the proposed ASHPs (Coefficient of Performance, Seasonal Coefficient of Performance, and the Seasonal Performance Factor), with plans showing the ASHP pipework and noise and visual mitigation measures;
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- Specification of any additional equipment installed to reduce carbon emissions;
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The development shall be carried out strictly in accordance with the details so approved prior to first operation and shall be maintained and retained for the lifetime of the development. The solar PV array shall be installed with monitoring equipment prior to completion and shall be maintained at least annually thereafter.

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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, and Local Plan (2017) Policies SP4 and DM22.

Reference No: PPA/2024/0023

Ward: Noel Park

Address: 25-27 Clarendon Road N8 0DD

Proposal: Redevelopment of the site consisting of the demolition of existing buildings and the construction of a mixed use scheme comprising workspace and co-living accommodation

Agent: Mr Richard Quelch, Q Square

Ownership: Private

Case Officer Contact: Valerie Okeiyi

QRP report

As noted in para 6.9 of the report the second QRP meeting took place on 3rd July. The notes have now been provided and are attached at Appendix 2.

Appendix 2 QRP Notes.