

## **Planning Sub-Committee 09<sup>th</sup> September 2024**

### **REPORT FOR CONSIDERATION AT PLANNING SUB-COMMITTEE**

#### **1. APPLICATION DETAILS**

**Reference No:** HGY/2024/0464

**Ward:** Tottenham Central

**Address:** College Of North East London Tottenham Centre, High Road, Tottenham, London, N15 4RU.

**Proposal:** Demolition of the existing gym/lecture theatre block and the erection of a part four/part five-storey building (2,625 square metres GIA) to host a new Construction and Engineering Centre at the College.

**Applicant:** Robin Hindley, Vice Principal, CONEL

**Ownership:** Private/Public

**Officer Contact:** Roland Sheldon

**Date received:** 14/03/2024

1.1 The application is being reported to the Planning Sub-Committee for determination as it is a major planning application recommended for approval.

#### **1.2 SUMMARY OF KEY REASONS FOR RECOMMENDATION**

- The principle of the re-provision of education floorspace on the campus in the form of new and upgraded facilities is acceptable given the London Plan and Haringey Local Plan strategic policies promoting education and skills. The site is also located in an 'Area of Change' with excellent public transport accessibility within the Tottenham Area Action Plan which seeks to promote new infrastructure for education purposes, meaning it is an appropriate location for the enhancement of the existing educational facility.
- The proposal will enable the college to continue and improve its effectiveness in the role of providing accessible and free/affordable courses in a range of subjects to young and adult students, enhancing employment opportunities for thousands of people across the borough.
- Officers are satisfied that the proposed building would provide a satisfactory design response within the constraints of its surroundings that would respect the scale, form and character of the wider locality. The less than substantial harm to surrounding listed assets would be outweighed by the educational, social and economic benefits that would result from the introduction of this facility.
- The proposed building has been designed to take account of climate change and to reduce carbon emissions, incorporating fabric efficiencies, on-site renewable

energy generation in the form of solar PV panels, and heating, cooling and hot water provided through air source heat pumps.

## **2. RECOMMENDATION**

- 2.1 That the Committee resolve to GRANT planning permission and that the Assistant Director of Planning, Building Standards & Sustainability or the Head of Development Management is authorised to issue the planning permission and impose conditions and informatives subject to the signing of a legal agreement providing the obligations as set out in the Heads of Terms below.
- 2.2 That the legal agreement referred to in resolution (2.1) above is to be completed no later than 9th October 2024 or within such extended time as the Assistant Director Planning, Building Standards & Sustainability/Head of Development Management shall in her/his sole discretion allow; and
- 2.3 That, following completion of the agreement(s) referred to in resolution (2.1) within the time period provided for in resolution (2.2) above, planning permission shall be granted in accordance with the Planning Application subject to the attachment of the conditions and informatives; and
- 2.4 That delegated authority be granted to the Head of Development Management or the Assistant Director Planning, Building Standards and Sustainability to make any alterations, additions or deletions to the recommended heads of terms and/or recommended conditions and informatives as set out in this report and to further delegate this power provided this authority shall be exercised in consultation with the Chair (or in their absence the Vice-Chair) of the Sub-Committee.

## **Summary Lists of Conditions, Informatives and Heads of Terms**

### Summary of Conditions (a full list is included in Appendix 1)

1. Time limit
2. Approved plans and documents
3. Design/material conditions
4. Delivery and servicing plan
5. Construction and logistics management
6. Cycle storage
7. Disabled parking bay
8. Car parking management
9. Revised energy statement
10. Living roof
11. Overheating
12. Biodiversity Net Gain
13. BREEAM
14. Restriction on Use Class
15. Permitted development
16. Landscaping
17. Unexpected contamination
18. NRMM
19. Demolition and construction environmental management plan
20. Considerate contractors

### Informatives

1. Proactive statement
2. Hours of construction work
3. Party Wall Act
4. Asbestos survey
5. Dust
6. Groundwater Risk Permit
7. Underground Water Assets
8. Minimum Water Pressure
9. Sprinkler installation
10. Designing Out Crime
11. Land ownership
12. S.106 Agreement and S.278 Agreement

### Summary of Section 106 Heads of Terms

1. Employment and Skills
  - a. Submission of an employment and skills plan
  - b. No less than 20% of the peak construction workforce to be Haringey residents
  - c. Provision of skills-based training to the 20% referenced above
  - d. 5% of the peak workforce to be provided with traineeships
  - e. Provision of a construction apprenticeships at one per £3m development construction cost up to a maximum of 10% of total construction workforce
  - f. Provision of a £1,500 support contribution per apprentice

- g. Provision of no less than five STEM/career inspirational sessions per construction phase
- h. Regular liaison with the Council to allow local businesses and suppliers to tender for works
- i. Other requirements as agreed in discussions with the Council's Employment and Skills Officer

## 2. Construction Logistics and Management

- a. Provide a contribution of £15,000 towards the assessment and monitoring of a detailed construction logistics and management plan (secured by condition)

## 3. College Travel Plan

A College Travel Plan must be secured by the S.106 agreement and submitted 6 months before occupation. As part of the travel plan, the following measures must be included in order to maximise the use of public transport.

- a) The applicant appoints a travel plan coordinator who must work in collaboration with the Facility Management Team to monitor the travel plan initiatives annually for a period of 3 years
- b) Provision of college induction packs containing public transport and cycling/walking information, available bus/rail/tube services, showers. Lockers, map and timetables to all new staff, travel pack to be approved by the Councils transportation planning team.
- c) The applicant will be required to provide, showers lockers and changing room facilities.
- d) The first surveys should be completed 6 months post occupation or on 50% occupation whichever is sooner.

A contribution of £3,000 per Travel Plan.

## 4. Energy statement/carbon mitigation

- a. An amended energy statement is to be provided prior to above ground construction
- b. Provision of a contribution to offset the carbon emissions of the development where not met on site against the zero-carbon target
- c. Estimate of the carbon offset figure is £23,085 (indicative) plus a 10% management fee; carbon offset contribution to be re-calculated at £2,308 per tCO<sub>2</sub> at the Energy Plan and Sustainability stages.
- d. Considerate Contractors

## 5. Monitoring

- Provision of a financial contribution of 5% total contributions + £500/non-financial obligation.

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

2.6 In the absence of the agreement referred to in resolution (2.1) above not being completed within the time period provided for in resolution (2.2) above, the planning permission be refused for the following reasons:

- The proposed development, in the absence of a legal agreement to work with the Council's Employment and Skills team and to provide other employment initiatives would fail to support local employment, regeneration and address local unemployment by facilitating training opportunities for the local population. As such, the proposal is contrary to Policy SP9 of Haringey's Local Plan 2017.
- The proposed development, in the absence of a legal agreement securing sufficient energy efficiency measures and/or financial contribution towards carbon offsetting, would result in an unacceptable level of carbon dioxide emissions. As such, the proposal would be contrary to Policy SI2 of the London Plan, Local Plan 2017 Policy SP4 and Policy DM21 of the Development Management DPD 2017.
- The proposed development, in the absence of a legal agreement securing sustainable transport measures and public highway works, would have an unacceptable impact on the safe operation of the highway network, give rise to overspill parking impacts and unsustainable modes of travel. As such, the proposal would be contrary to London Plan Policies T1, T2, T6, T6.1 and T7, Local Plan Policy SP7 and Policy DM31 of the Development Management DPD.

2.7 In the event that the Planning Application is refused for the reasons set out in resolution (2.6) above, the Head of Development Management (in consultation with the Chair of the Planning Sub-Committee) is hereby authorised to approve any further application for planning permission which duplicates the Planning Application provided that:

- i. There has not been any material change in circumstances in the relevant planning considerations, and;
- ii. The further application for planning permission is submitted to and approved by the Assistant Director or Head of Development Management within a period of not more than 12 months from the date of the said refusal, and;
- iii. The relevant parties shall have previously entered into the agreement contemplated in resolution (2.6) above to secure the obligations specified therein.

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## **APPENDICES:**

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Appendix 2: Images of site and the proposed scheme

Appendix 3: Internal and External Consultee Representations

Appendix 4: Minutes from Planning Sub-Committee 05.02.24

Appendix 5: Quality Review Panel Report 18.10.23

Appendix 6: Quality Review Panel Report 17.01.24

Appendix 7: Drawing and Reports List

### **3. PROPOSED DEVELOPMENT AND SITE LOCATION DETAILS**

#### **Proposed Development**

- 3.1 The proposal seeks permission to demolish an existing three-storey building occupied by a gym and lecture theatre, and the construction of a part four, part five-storey building to host the Construction and Engineering Centre of the College as part of a master planning process.
- 3.2 The gym and associated changing room facilities in the building proposed to be demolished as part of the development will be re-provided within the main college building, prior to the start of term.
- 3.3 Specifically, the proposal comprises the following:
- Demolition of the 1,050 sq m existing gym/lecture theatre;
  - Construction of a new 2,625 sq m building extending over 5 storeys
  - Double height workshops on the ground and first floor accommodating bespoke training facilities for construction trades – plumbing, plastering, electrical, brickwork; and
  - Cantilevered upper floors providing classrooms and breakout areas for student collaboration
- 3.4 It should also be noted that the existing building in the western corner of the campus that currently houses the Construction and Engineering Centre does not form part of the application red line boundary of the site. It is intended that this building once vacated will be demolished and this parcel of land be made available for future redevelopment. The applicant has provided masterplanned options for this redevelopment to ensure an acceptable relationship between this proposal and any future development on that parcel of land.

#### **Site and Surroundings**

##### *Site Description*

- 3.5 The site forms part of the College of Haringey, Enfield and North-East London, known as CONEL, and is located on High Road, Tottenham Green. The existing campus comprises approximately 19,930 square metres of education floorspace providing a range of different vocational courses.
- 3.6 The site is identified as an 'Area for Change' in the Tottenham Area Action Plan and is also located on the western edge of Tottenham Green Conservation Area. The site sits behind the 1970s tower block of the College and is surrounded by statutorily listed buildings located immediately to the north of the site and by the locally listed building within the southern section of the college campus.
- 3.7 The buildings surrounding the proposed development range from the two-storey cottages and the three-storey listed old firemen's station to the north,

the eight-storey tower block to the east, the four-storey residential development to the south and west.

- 3.8 The site has a Public Transport Accessibility Level (PTAL) value of 6a, which is considered 'excellent' access to public transport services. There are several bus services accessible to the site, while Seven Sisters underground station is within walking distance of the college.

#### **Relevant Planning and Enforcement history**

- 3.9 None of the planning history is relevant to the current proposal.

#### **4. CONSULTATION RESPONSE**

##### Quality Review Panel

- 4.1 The scheme was presented to Haringey's Quality Review Panel at pre-application stage in October 2023 and January 2024. The Panel's written responses are attached in Appendices 5 and 6.

##### Planning Committee Pre-Application Briefing

- 4.2 The proposal was presented to the Planning Sub-Committee at a Pre-Application Briefing on 05<sup>th</sup> February 2024. The minutes are attached in Appendix 4.

##### Planning Application Consultation

- 4.3 The following were consulted regarding the application:

##### Internal

- 4.4 LBH Conservation: Considers that the development would result in a low level of less than substantial harm to heritage assets that need to be considered in the context of the NPPF whereby they could be outweighed by the public benefits of the scheme.
- 4.5 LBH Transportation: No objections, subject to conditions and obligations
- 4.6 LBH Carbon Management: No objections, subject to conditions and obligations.
- 4.7 LBH Flood and Water Management: No objections, content that the impact of surface water drainage have been adequately addressed.
- 4.8 LBH Waste Management: No objections were raised to the proposal.
- 4.9 LBH Pollution: No objections subject to conditions.
- 4.10 LBH Inclusive Economy: Support for the application, as CONEL are a strategic partner of the Council that work closely with the Inclusive Economy Service. CONEL are the largest further education provider in the borough offering free courses to Haringey residents and bring footfall into Tottenham as a



destination venue. It is hoped that CONEL will work closely with the service to maximise local jobs and training on construction programmes and explore green skills ambitions and circular economy opportunities further.

## External

### 4.11 Transport for London: Comments provided with regards to

- Modal share and travel plan targets
- Cycle parking
- Car parking
- Delivery and servicing
- Construction access

The applicant responded to initial concerns to the satisfaction of TfL subject to conditions and s106 requirements.

### 4.12 Thames Water: No objections, subject to informatives.

### 4.13 Historic England: No comment – the Council should seek the views of your specialist conservation advisers, as relevant.

### 4.14 War Memorials Trust: Do not consider the proposed development to adversely affect the setting of the Grade II listed Tottenham war memorial.

### 4.15 Greater London Archaeological Advisory Service: No objections, and no conditions are necessary.

### 4.16 Metropolitan Police Designing Out Crime Officer: The DOCO has met with the applicant at pre-application stage. The applicant does not wish to participate in seeking to achieve Secured By Design (SBD) which the police strongly consider they should. Conditions should be applied seeking applicant to apply and achieve SBD certification.

## 5. LOCAL REPRESENTATIONS

### 5.1 The application has been publicised by way of a press notice, several site notices which were displayed around the site and in the vicinity of the site and over one thousand individual letters sent to surrounding local properties. The number of representations received from neighbours, local groups, etc in response to notification and publicity of the application were as follows:

- No of individual responses: 3
- Objecting/Commenting: 3

### 5.2 The following local groups/societies made representations:

- None

### 5.3 The following Councillor(s) made representations:

- None

5.4 The following issues were raised in representations that are material to the determination of the application and are addressed in the next section of this report:

- Concern with the impact on the listed building and conservation area due to the scale of the proposal
- Solar panels should be included
- Concerns about dust and vehicle movements during construction

## **6. MATERIAL PLANNING CONSIDERATIONS**

6.1 The main planning issues raised by the application that the committee must consider are:

- Principle of Development
- Design and Appearance
- Heritage and Conservation
- Inclusive Design
- Energy, Climate Change and Sustainability
- Drainage and Flooding
- Impact on Neighbouring amenity
- Highways and Transportation
- Air Quality
- Land Contamination
- Fire Safety
- Equalities
- Conclusion

### **6.2 Principle of Development**

6.2.1. Paragraph 100 of the National Planning Policy Framework (NPPF) states that to ensure faster delivery of other public service infrastructure such as further education colleges, hospitals and criminal justice accommodation, local planning authorities should work proactively and positively with promoters, delivery partners and statutory bodies to plan for required facilities and resolve key planning issues before applications are submitted.

6.2.2. London Plan (2021) policy S3 states that development proposals for education facilities should be located in areas of identified need, with good public transport accessibility and access by walking/cycling, and should be accessible by a range of users, including disabled people.

6.2.3. Local Plan (2017) policy SP9 states that the Council will seek to address unemployment by facilitating training opportunities for the local population, increasing the employment offered in the borough and allocating land for employment purposes. The Council will encourage the provision and growth of education and training facilities within the borough in areas such as Haringey Heartlands and Tottenham Hale and areas of high unemployment.

Development Management policy DM49 states that proposals for new and extended social and community facilities will be supported by the Council provided they are accessible by public transport, walking and cycling, are located within the community they intend to serve, provide flexible, multifunctional and adaptable space, where practicable, do not have significant adverse impact on road safety/traffic generation and protect neighbouring amenity.

6.2.4. Whilst there is not a specific site allocation for this site, the Tottenham Area Action Plan identifies the site as just on the edge of the 'Tottenham Green Sub Area'. The AAP supports the area as the civic and cultural heart of

Tottenham, the redevelopment of underused sites that detract from the significance of the conservation area and public realm enhancements between the buildings on the green to create more attractive and accessible public squares. Policy TG1 Tottenham Green's Civic Heart states that development which serves to consolidate and improve access to community facilities in the area will be supported.

- 6.2.5. Objective 1 of the Tottenham Area Action Plan is "World class education and training" to enable Tottenham residents to access the full range of options available to them in London. Policy AAP11 of the Tottenham Area Action Plan (2017) states the Council will plan positively to introduce improved facilities in Tottenham which meets the overall needs of the population, including meeting existing deficits, as well as the needs of new developments. The Council will actively seek to introduce tertiary education operators into the Tottenham area to ensure local residents have excellent options to gain skills to access the London jobs market.
- 6.2.6. The submitted Planning Statement outlines that CONEL forms part of the Capital City College Group (CCCG), which handles a large Adult Education Budget that is allocated to it from the Greater London Authority (GLA), a significant part of which is allocated to delivering training in Haringey. Changes made to funding by CCCG has resulted in allowing all Level 2 and below, but also nearly all Level 3 programmes and a growing number of Professional Level 4 courses, to remove fees from courses, including for Haringey residents.
- 6.2.7. CONEL provides a broad range of programmes from entry level to Level 7, ranging from accountancy and bookkeeping, hairdressing & beauty therapy, as well as the engineering and construction trades. The college also offers a range of free support courses in computer literacy-related subjects, enabling people to upskill and increase their employment prospects.
- 6.2.8. The Tottenham Centre currently has some 8,305 full and part time students (2,893 FTE), the majority of which are adults on part time courses seeking to upskill.
- 6.2.9. The site is also located in an 'Area of Change' with excellent public transport accessibility. The principle of the re-provision and enhancement of education floorspace on the campus in the form of new and upgraded facilities has strong support in the London Plan and Haringey Local Plan strategic policies which promote education and skills and the Tottenham Area Action Plan which seeks to promote new infrastructure for education purposes. The proposal will allow the college to provide enhanced facilities for engineering and construction students, and thereby enhance their educational experience and future employment prospects.
- 6.2.10. The principle of the development on this site is strongly supported by Development Plan Policy.

### **6.3 Design and Appearance**

- 6.3.1. The Chapter 12 of the NPPF states that good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.
- 6.3.2. Chapter 12 of the NPPF states that that good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.
- 6.3.3. It states that, amongst other things, planning decisions should ensure that developments function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development, and should be visually attractive due to good architecture, layouts, and appropriate and effective landscaping.
- 6.3.4. The London Plan 2021 Policy D3 emphasises the importance of high-quality design and seeks to optimise site capacity through a design-led approach. Policy D4 of the London Plan notes the importance of scrutiny of good design by borough planning, urban design, and conservation officers as appropriate. It emphasises the use of the design review process to assess and inform design options early in the planning process.
- 6.3.5. Policy SP11 of the Haringey Local Plan requires that all new development should enhance and enrich Haringey's built environment and create places and buildings that are high quality, attractive, sustainable, safe and easy to use.
- 6.3.6. Policy DM1 of the DM DPD requires development proposals to meet a range of criteria having regard to several considerations including building heights; forms, the scale and massing prevailing around the site; the urban grain; and a sense of enclosure. It requires all new development to achieve a high standard of design and contribute to the distinctive character and amenity of the local area.
- 6.3.7. Policy DM6 of the DM DPD expects all development proposals for taller buildings (i.e. those which are greater in height than their surroundings and are less than ten storeys in height) to respond positively to local context and achieve a high standard of design in accordance with Policy DM1.

#### Quality Review Panel (QRP)

- 6.3.8. The development proposal was presented to the QRP on 18 October 2023, who offered their support for the principle of the scheme and set out their recommendations to address relevant design considerations of the building. The proposal was then presented again to the QRP in the form of a Chair's Review on 17 January 2024. The Panel's summarising comments of this latest review are provided below.
- 6.3.9. *"The Quality Review Panel welcomes the proposals for a new college on this site. This will be of strategic importance to the borough. It thinks that the project team has responded positively to the panel's previous comments."*
- 6.3.10 *The long-term masterplan is helpful to understand the wider ambitions for this site. The panel is now convinced that access issues have been resolved,*

*enabling the future residential development in the western corner. The project team is encouraged to develop the detail of the masterplan, including a construction management plan that considers the potential impact on public transport services in the immediate area. The reduction in height and massing creates a more comfortable relationship with the scheme's context. While some heritage impact remains in views from Isobel Place, this is justified by the public benefits that the college will bring. The architecture has developed well since the previous review. The horizontal banding detail successfully references the surrounding context. The north elevation, seen from Isobel Place, should not distract from the local heritage assets.*

6.3.11 *The panel commends the project team's approach to sustainability but asks for further thought on the western elevation, as this must be designed to mitigate both overheating and overlooking. The drainage strategy should have the capacity to withstand one-in-one-hundred-year storms. The panel also suggests taking advantage of the Greater London Authority's sustainability reporting tools. The panel understands the challenge of delivering biodiversity and urban greening uplift on this part of the site. It encourages the project team to develop the landscaping designs to ensure that this will be delivered in future phases, and to find opportunities such as on rooftops to increase provision wherever possible."*

6.3.12 Since the date of the review the proposal has been amended to address the most recent comments from the QRP. The table below provides a summary of key points from the most recent review, with officer comments following:

<b>Panel Comments</b>	<b>Officer Response</b>
<b>Masterplan</b>	
The panel welcomes the development of a wider masterplan. It is helpful to understand the long-term ambitions for the site's phased development and how this application will fit in. Further work is required to progress the detail, but this provides a good base to build upon.	The applicant has submitted an illustrative masterplan which provides an outline of the long-term intention to improve the quality of the existing courtyard environments and create a more legible campus.

It is not yet clear whether the residential scheme indicated in the western corner of the campus will go ahead. However, the panel is now convinced that the issues of access via Isobel Place have been resolved, which will enable the future development of this site.	It was clarified during the second QRP meeting that the college benefits from a right of way from Isobel Place that would allow any future scheme to be accessed from this road.
The panel encourages the London Borough of Haringey to employ the appropriate planning mechanisms to ensure that the application includes a construction management plan for the masterplan.	A construction management plan will be secured through condition addressing the impact of the current proposal. Any future permission will also be subject to similar conditions.
This should consider the spillover of construction traffic from this site onto Tottenham High Road. The panel recommends engaging with Transport for London in advance regarding the potential impact on public transport services, and the mitigation measures that will be required to minimise this.	<p>The application has been reviewed in detail by Council Transportation Officers as well as Transport For London. Subject to conditions for a more detailed worked-up construction logistics plan that includes engagement with officers, Transport officers consider such matters can be adequately addressed.</p> <p>The S106 obligations secured a monitoring fee to ensure transposition can work with the applicant to address any issues that arise during construction and monitor works on site.</p>
<b><i>Height, massing and heritage impact</i></b>	
The combined reduction in height and setback of the top floor constitutes a significant improvement. While this has resulted in a small loss of classrooms, the scheme is now hardly visible from the High Road and has a more comfortable, subservient	Noted.

relationship with the college's 1970s tower block.	
In the panel's view, some impact on heritage remains, particularly in views from Isobel Place. However, the impact is now acceptable and is outweighed by the public benefits that this scheme will bring.	Noted. Whilst some less than substantial harm has been identified by the Council Heritage Officer, they acknowledge that the impact is outweighed by the public benefits that the scheme would provide.
<b>Architecture</b>	
The panel supports the idea of using brickwork with a lighter tone horizontal stone or concrete banding. This solution successfully references the banding of both the adjacent 1970s tower and the statutorily listed buildings of the conservation area to create a family of buildings.	Noted. This design approach has been incorporated into the full submission.
<b>Sustainability</b>	
The western façade is sensitive to overheating. The panel advises minimising the use of glass on this elevation. This will also help with cooling.	There is a smaller amount of glazing on the western elevation in comparison to the eastern elevation, whilst allowing for the overall function of the building to not be compromised.
The balance required between daylight, overheating, and privacy could be resolved through careful window design. It is positive that the windows on the western elevation are set back.	Whilst this issue on the western elevation has not been specifically addressed, the recessed window design is noted and welcomed. Carbon Management note in their comments that a large part of the internal heat gain is due to the type of engineering equipment used in the buildings, and shading features have been included in the architectural elevations/sections.
The amount of hard standing is a practical choice for the landscaping considering the	The proposal has been reviewed by the Council's Flood and Water Management Officer, who



building's use, but there must be a strategy for water run-off in the event of flooding, to avoid damage to the building. The panel recommends that the sustainability consultant's drainage strategy is designed with sufficient capacity to withstand one in one-hundred-year storms, as these are becoming more frequent	is satisfied that the impacts of surface water drainage have been adequately addressed.
<b><i>Urban Greening and Biodiversity</i></b>	
The application boundary for this proposal is much more constrained than the wider masterplan ownership boundary. It is therefore difficult to meet the requirements for urban greening and biodiversity net gain within this scheme.	The applicant has managed to provide a sizeable biodiversity net gain and an increased urban greening. The constraints of the application boundary have meant this has had to be achieved through a green roof with bird and bat boxes, and insect houses within the green roof itself.
The project team are encouraged to continue to develop the landscaping design and strive for the delivery of the full masterplan as this will meet the ambition for a significant urban greening and biodiversity uplift in future stages.	The illustrative masterplan indicates that the centenary courtyard is envisaged to be subject to ecological enhancements in later phases of the college re-development.

6.3.13 As set out above, the applicant engaged with the QRP during the pre-application stage. The development proposal submitted as part of this application has evolved over time to respond to the detailed advice of the panel. It is considered the points raised by the QRP have been addressed to an appropriate and acceptable extent.

6.3.14 The building is largely four-storey in scale with a small recessed and reduced five-storey element that would sit in the south-western portion of the building, and would have a similar rectangular footprint to the existing building that it would replace. The building bulk and massing has been reduced through the removal of one storey during the evolution of the design process, to address concerns raised at pre-application stage by officers and QRP members. The building proposed at pre-application stage was considered to be visually over-dominant in its scale and height in terms of its relationship with nearby listed and locally listed assets, obscuring the established gap between the listed Town Hall and Fire Station buildings when viewed from the north-east of the

site. The top section of the building was also considered to undesirably project above the locally listed college building.

- 6.3.15 The current planning application has largely addressed these concerns through the changes to the massing with the reduced height and bulk, which means that the proposed building will largely not be visible from the High Road, albeit it will still have a sizeable presence when viewed from Isobel Place.
- 6.3.16 The elevational composition and materials for the development has evolved from a need to consider the educational function of the building, respond sympathetically and elegantly to the surrounding built environment, and achieve a sustainable and energy efficient building.
- 6.3.17 The elevations have a strong vertical rhythm, using a palette of clay red brick with distinct horizontal stone banding between each floor, which draw strong references to the historic listed buildings to the north of the site, whilst blending with the red brick of the adjacent college tower building.
- 6.3.18 The elevations are articulated through the inclusion of recessed saw tooth brickwork window surrounds and large elements of glazing. Further details of specific materials, cross-sectional and more detailed elevation drawings that detail key junctions between different materials, windows and door reveals, can be required to be submitted and approved prior to commencement of above ground works on site, to ensure a high standard of design is achieved.
- 6.3.19 Access into the building would be through the existing main access to the college via the reception in the Centenary Building, where it would be necessary to walk into the courtyard and walk around the tower block into the proposed new building entrance. In this sense, the means of access into the building would be secure given that access is ID controlled through the reception area of the college, and secure lines would be provided via security-controlled gates, to control access via the servicing lane. As outlined in the Inclusive Design section of this report, the proposed new building would provide level means of access and a lift facility to all floors of the building, with a changing room provided at ground floor level with disabled WC on all floors, and adequate widths and circulation space for wheelchair accessibility throughout the building.
- 6.3.20 The development unfortunately would not result in a significant uplift in the quality of the public realm within the college. The service yard would be treated with asphalt, with permeable paving treatment proposed around the perimeter of the new building. The applicant has outlined that due to the need to provide adequate and safe means of access within the servicing yard, it has not been possible to provide additional soft landscaping within this area. The illustrative masterplan envisions that in a future phase the Centenary Courtyard area that the new building would access onto will eventually be subject to an extensive soft landscaping scheme, to provide a calmer and more pleasant environment for students to carry out group work or learn within. This area will also provide ecological enhancements to the college campus.

- 6.3.21 This is still at concept stage however, and will be dependent on the future removal of the exam building which will eventually be re-housed elsewhere within the college campus. By means of a temporary measure and to provide some greening of the courtyard environment in the interim period, the applicant has agreed to install three moveable planters into this area, which shall contain plants and flowers.
- 6.3.22 Overall, subject to the submission of satisfactory materials and more detailed elevational/sectional drawings, Officers are satisfied that the proposed building would provide a satisfactory design response within the constraints of its surroundings that would respect the scale, form and character of the wider locality, that would enhance the teaching and learning environment for teaching staff and students of the college.

## **6.4 Heritage and Conservation**

- 6.4.1. There is a legal requirement for the protection of Conservation Areas. The legal position on the impact on these heritage assets is as follows, Section 72(1) of the Listed Buildings and Conservation Areas Act 1990 provides: "In the exercise, with respect to any buildings or other land in a conservation area, of any functions under or by virtue of any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area." Among the provisions referred to in subsection (2) are "the planning Acts".
- 6.4.2. Section 66 of the Act contains a general duty as respects listed buildings in exercise of planning functions. Section 66 (1) provides: "In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses."
- 6.4.3. The Barnwell Manor Wind Farm Energy Limited v East Northamptonshire District Council case tells us that "Parliament in enacting section 66 (1) intended that the desirability of preserving listed buildings should not simply be given careful consideration by the decision-maker for the purpose of deciding whether there would be some harm, but should be given "considerable importance and weight" when the decision-maker carries out the balancing exercise."
- 6.4.4. The judgment in the case of the Queen (on the application of The Forge Field Society) v Sevenoaks District Council says that the duties in Sections 66 and 72 of the Listed Buildings Act do not allow a Local Planning Authority to treat the desirability of preserving listed buildings and the character and appearance of conservation areas as mere material considerations to which it can simply attach such weight as it sees fit. If there was any doubt about this before the decision in Barnwell, it has now been firmly dispelled. When an authority finds that a proposed development would harm the setting of a listed building or the character or appearance of a conservation area or a Historic Park, it must give that harm considerable importance and weight.

- 6.4.5. The Authority's assessment of likely harm to the setting of a listed building or to a conservation area remains a matter for its own planning judgment but subject to giving such harm the appropriate level of weight and consideration. As the Court of Appeal emphasised in *Barnwell*, a finding of harm to the setting of a listed building or to a conservation area gives rise to a strong presumption against planning permission being granted. The presumption is a statutory one, but it is not irrebuttable. It can be outweighed by material considerations powerful enough to do so. An authority can only properly strike the balance between harm to a heritage asset on the one hand and planning benefits on the other if it is conscious of the strong statutory presumption in favour of preservation and if it demonstrably applies that presumption to the proposal it is considering.
- 6.4.6. In short, there is a requirement that the impact of the proposal on the heritage assets be very carefully considered, that is to say that any harm or benefit needs to be assessed individually in order to assess and come to a conclusion on the overall heritage position. If the overall heritage assessment concludes that the proposal is harmful then that should be given "considerable importance and weight" in the final balancing exercise having regard to other material considerations which would need to carry greater weight in order to prevail.
- 6.4.7. London Plan Policy HC1 states that development proposals affecting heritage assets and their settings should conserve their significance. Local Plan Policy SP12 and Policy DM9 of the DM DPD sets out the Council's approach to the management, conservation and enhancement of the Borough's historic environment, including the requirement to conserve the historic significance of Haringey's heritage assets and their settings. Policy DM9 also states that proposals affecting a designated or non-designated heritage asset will be assessed against the significance of the asset and its setting, and the impact of the proposals on that significance; and sets out a range of issues which should be taken into account.
- 6.4.8. The proposed development is located on the western edge of Tottenham Green Conservation Area, which is here characterised as an established, spacious civic space. The development site sits behind the 1970s tower block of the College and is surrounded by statutorily Listed Buildings located immediately to the north of the site and by the locally listed MCC Tottenham Technical College.
- 6.4.9. The development site appears constrained by its densely built immediate context set just behind the spacious historic frontage of the Conservation Area where the established group of Listed Buildings including the Old Fire station, Tottenham Town Hall and The former County School contribute to the imposing civic character of the area through consistent height, similar architectural style and generous gaps between buildings that afford uncluttered views towards the rear of the historic frontage.
- 6.4.10. The buildings surrounding the development site range from the two-storey cottages and the three-storey listed old firemen's station to the north, the eight-storey tower block to the east, and the four-storey residential development to the south and west.

- 6.4.11. The eight-storey tower Block of the college rises above the listed old Fire Station in eastward views along Townhall approach, as well as in northward views of the locally listed college building along the High Road. It is considered to detract from the character of the Conservation Area due to its uncharacteristic scale and height that dominate in views well above the established roofline provided by the listed and locally Listed Buildings forming the historic frontage of the area.
- 6.4.12. It is proposed to develop a part four, part five-storey new building to host the Construction Centre of the College. At pre-application stage officers challenged the spatial and architectural relationship of the proposed new building with its immediate built and landscape context within the campus, officers were informed that the proposed building would be the first step of a campus-wide master plan, enabled by the demolition and replacement of the existing three storey gym/lecture theatre block, and that further phases of the masterplan will restore the original quadrangle that shaped the development of the main 2005 building. As per pre-application discussion, the proposed development of the Construction Centre is intended to facilitate the masterplan's reconfiguration of the campus and the activation of the proposed Centenary Courtyard space, thus enhancing the designed quality of the College site, and benefitting the Conservation Area as well as enhancing the setting of the locally listed college building.

The proposed Construction Centre is illustrated in the application as an individual building to be erected within the existing campus, and therefore needs to be assessed based on its own design merits and based on its impact of the heritage assets surrounding the development site.

- 6.4.13. The proposed scheme has been tested in views of the heritage buildings and the Conservation Area, and no northward view of the High Road frontage has been submitted to show the impact of proposed development on the gap between the College and the locally listed residential building at Sycamore Gardens, but it is understood that the new building will be totally hidden behind the existing frontage buildings of the College and the mature trees along the High Road would further screen the College to the view.
- 6.4.14. It is therefore considered that there will be no negative impact on the locally listed college building. The submitted views analysis shows how the new part four, part five-storey building will only be partially screened in views of the Conservation Area frontage as dynamically experienced from the High Road; this is in part due to its dense built context, but it is especially due to the new building being set just behind the eight-storey large tower block.
- 6.4.15. As shown in the views included in the submitted Design and Access statement, the new building will intrude in the background of the listed Tottenham Town Hall and Former Fire Station both in views from the Tottenham Green and from Town Hall approach. It will also dominate in the background of the positive contributors firemen cottages as seen from Isobel Place.
- 6.4.16. The new Construction Centre building will undesirably, yet modestly appear behind the listed and locally listed frontage of the Conservation Area in

several views, where it would still partially obscure the established gap between the listed Town Hall and the listed Fire Cottage. Filling into visual gaps erodes the established qualities of the setting that have so far contributed to preserve the original character of the Listed Buildings and their Conservation Area. However, due to its relatively modest height, and due to its upper floor being set back in plan from the northern boundary, the new building will not detract from the visual primacy and architectural contribution of the Listed Buildings to the street scene, and it would therefore only have a modestly negative impact on the nationally important Fire Station and Town Hall and on their Conservation Area frontage. It is concluded that the proposed development would lead to a low level of less than substantial harm and the assessment of its design quality and public benefits should inform the test set out at Paragraph 208 of the NPPF.

- 6.4.17. Noting that the Conservation Officer finds a low level of less than substantial harm, paragraphs 208 and 209 of the NPPF sets out that where there is less than substantial harm to the significance of heritage assets *“this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.”*
- 6.4.18. Paragraph 205 of the NPPF (2023) outlines that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.
- 6.4.19. The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.
- 6.4.20. This application follows the completion of an Estates Strategy Review of the wider campuses within the Capital City College Group (CCCG). The Tottenham campus subject to this application has had little investment and many buildings on the site are in poor condition, suffering from poor functional stability. The review concluded that whilst the majority of buildings on site were operational, the majority require upgrading. The existing building in question was identified as having a poor thermal performance, water penetration at roof level and suffering from ceiling/floor damage in a number of areas.
- 6.4.21. The piecemeal nature of construction on the campus has resulted in poor circulation and legibility across the site. The proposed replacement Construction and Engineering Centre will form the first phase of a redevelopment of the college campus, providing bespoke teaching facilities and workshops for students in construction and engineering, up to modern standards to accommodate the demands of these courses in terms of height and space. The building will provide modern, fit for purpose facilities for some 900 students, most of them adults, who currently undertake construction courses at CONEL each year.

- 6.4.22. The proposal will make a significant contribution towards meeting the Local Plan objectives to improve skills and training for residents, to support access to jobs in the construction industry.
- 6.4.23. The educational, social and economic benefits that will follow in due course from the introduction of such a facility are considered to outweigh the less than substantial harm to surrounding heritage assets. As such, the development would on balance be acceptable with regards to heritage considerations.

## **6.5 Inclusive Design**

- 6.5.1. Policy S3 of the London Plan seeks to ensure that new education developments are accessible and inclusive for a range of users, including disabled people, by adopting an inclusive design approach. DM policy DM2 requires that proposals can be used safely, easily and with dignity by all.
- 6.5.2. The proposed new building would provide level means of access and a lift facility to all floors of the building, with a changing room provided at ground floor level with disabled WC on all floors, and adequate widths and circulation space for wheelchair accessibility throughout the building. The proposal is therefore acceptable with regards to inclusive design considerations.

## **6.6 Energy, Climate Change and Sustainability**

- 6.6.1 London Plan Policy SI2 sets out the Mayor of London's energy hierarchy: Use Less Energy (Be Lean); Supply Energy Efficiently (Be Clean); Use Renewable Energy (Be Green) and (Be Seen). It also sets a target for all development to achieve net zero carbon, by reducing CO2 emissions by a minimum of 35% on-site, of which at least 10% should be achieved through energy efficiency measures for residential development (or 15% for commercial development) and calls on boroughs to establish an offset fund (with justifying text referring to a £95/tonne cost of carbon). London Plan Policy SI2 requires developments referable to the Mayor of London to demonstrate actions undertaken to reduce life-cycle emissions.
- 6.6.2 London Plan Policy SI3 calls for major development in Heat Network Priority Areas to have a communal low-temperature heating system, with the heat source selected from a hierarchy of options (with connecting to a local existing or planned heat network at the top).
- 6.6.3 London Plan Policy SI4 calls for development to minimise overheating through careful design, layout, orientation, materials and incorporation of green infrastructure, designs must reduce overheating in line with the Cooling Hierarchy. London Plan Policy SI5 calls for the use of planning conditions to minimise the use of mains water in line with the Operational Requirement of the Buildings Regulations (residential development) and achieve at least BREEAM 'Excellent' standard for 'Wat 01' water category or equivalent (commercial development).
- 6.6.4 London Plan Policy SI7 requires applications referable to the Mayor of London to submit a Circular Economy Statement demonstrating how it promotes a circular economy within the design and aim to be net zero waste.

6.6.5 Local Plan Strategic Policy SP4 requires all new development to be zero carbon (i.e. a 100% improvement beyond Part L of the 2013 Building Regulations) and a minimum reduction of 20% from on-site renewable energy generation. It also requires all non-residential developments to achieve a BREEAM rating 'Very good' (or equivalent), although developments should aim to achieve 'Excellent' where achievable.

6.6.6 Haringey Policy SP6 requires developments to seek to minimise waste creation and increase recycling rates, address waste as a resource and requires major applications to submit Site Waste Management Plans.

6.6.7 Policy DM21 of the Development Management Document requires developments to demonstrate sustainable design, layout, and construction techniques.

#### 6.6.8 Energy

##### *Be Lean*

6.6.9 The proposed development would achieve a predicted reduction in CO<sub>2</sub> emissions of 36% from the baseline development model, which represents an annual saving of approximately 4.5 tonnes of CO<sub>2</sub> from the baseline model.

6.6.10 The applicant has proposed a 3% saving in carbon emissions through fabric efficiencies with regards to the Be Lean assessment. Carbon Management officers sought for an increase in the fabric efficiency of the building, but accept that it is challenging for non-residential developments to reach the minimum 15% requirement against Part L of the Building Regulations 2021. A condition shall be imposed that the scheme achieves no less than this level of carbon savings through fabric efficiencies, and seeks to improve on this at design stage, in line with London Plan policy SI2.

##### *Be Clean*

6.6.11 With regards to the 'Be Clean' strategy for the development, the applicant has submitted a site plan and floor plans that show the potential future connection point on site and within the building to connect to the District Energy Network (DEN) in Tottenham Hale or extended network, if this is eventually linked to the Energy Recovery Facility (ERF) currently under construction in Edmonton.

##### *Be Green*

6.6.12 The development incorporates an array of Solar PV panels on the roof to provide electricity, and air source heat pumps for heating, cooling and hot water production, equating to 33% carbon savings against Part L of the Building Regulations 2021.

##### *Be Seen*

6.6.13 In line with London Plan policy SI2 requirements, the applicant has provided evidence of submitting the scheme to the GLA to allow future monitoring of energy performance of the development.



### *Carbon Offset*

6.6.14 The development still falls short of the zero-carbon policy target for proposed domestic and non-domestic uses. Overall, the amount of carbon to be offset would be 8.1 tonnes per year. Based on 30-years of annual carbon dioxide emissions costed at £95 per tonne, this amounts to £23,085 (plus a 10% management fee of £2,308). A s106 planning obligations will secure this sum or any different agreed sum in the light of additional carbon savings that arise from more detailed design.

### *Overheating*

6.6.15 In accordance with the Energy Assessment Guidance, the applicant has undertaken a dynamic thermal modelling assessment, which indicated that all spaces in the assessment would pass the overheating requirements.

6.6.16 This has been achieved partly through the following measures:

- efficient lighting and dimming where possible to reduce internal gains.
- high solar control glazing with a solar transmittance of 0.40 to reduce solar gains.
- low glazing ratio
- shading from existing buildings on site
- mechanical ventilation to reduce the cooling demand.

### *Sustainability*

6.6.17 The submitted sustainability report sets out the proposed measures to improve the sustainability of the scheme, including transport, materials and waste, water consumption, flood risk and drainage, biodiversity, climate resilience, energy and CO2 emissions and landscape design.

- Non-domestic BREEAM requirement

6.6.18 Policy SP4 requires all new non-residential developments to achieve a BREEAM rating 'Very Good' (or equivalent), although developments should aim to achieve 'Excellent' where achievable.

6.6.19 The applicant has prepared a BREEAM Pre-Assessment Report for the proposed development. Based on this report, a score of 68.15% is expected to be achieved, equivalent to 'Very Good' rating. A potential score of 77.58% could be achieved. It is recommended that this is secured by use of a planning condition.

- Considerate Constructors Scheme

6.6.20 The applicant has agreed in their submitted BREEAM report that the Considerate Constructors Scheme could be used to achieve the responsible construction management objectives of the BREEAM report. A requirement to achieve formal certification could be secured by way of a S106 obligation.

- Urban Greening/biodiversity

- 6.6.21 All development sites must incorporate urban greening within their fundamental design and submit an Urban Greening Factor Statement, in line with London Plan Policy G5. London Plan Policy G6 and Local Plan Policy DM21 require proposals to manage impacts on biodiversity and aim to secure a biodiversity net gain. Additional greening should be provided through high-quality, durable measures that contribute to London's biodiversity and mitigate the urban heat island impact.
- 6.6.22 The submitted Biodiversity Net Gain calculation shows a net gain of 80.81%, which is above the 10% requirement as set out in the Environment Act 2021, achieved through the provision of the extensive green roof. A condition can be imposed on the development that requires sufficient detail of the living roof and its maintenance plan, to ensure that it provides maximum provision towards the creation of habitats for biodiversity.
- 6.6.23 The development achieves an Urban Greening Factor of 0.30 by way of the provision of an extensive green roof. This complies with the interim minimum target of 0.3 for predominantly non-residential developments in London Plan Policy G5.

## **6.7 Drainage and Flooding**

- 6.7.1 London Plan Policy SI 13 'Sustainable drainage' and Local Plan (2017) Policy SP5 'Water Management and Flooding' require developments to utilise sustainable urban drainage systems (SUDS) unless there are practical reasons for not doing so, and aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible in line with the following drainage hierarchy: Policy DM24 of the DM DPD seek to ensure that new development reduces the risk of flooding and provides suitable measures for drainage.
- 6.7.2 The Council's Flood and Water Management Officer has reviewed the applicant's submitted Drainage Design Report and stated that they are satisfied with the information that has been submitted in terms of assessing the full planning application and if the site is to be built and maintained as per the above referred Drainage Design report. On this basis they are content that the impacts of surface water drainage have been adequately addressed.

## **6.8 Impact on Neighbouring Amenity**

- 6.8.1 The proposal site is in relatively close proximity to a number of adjoining properties. Residential amenity comprises a range of issues which include daylight, sunlight, overlooking, overshadowing impacts, as well as sense of enclosure and a loss of outlook.
- 6.8.2 The Development Plan contains policies which seek to appropriately safeguard the amenities of residential occupiers when considering new development. London Plan Policy D5 seeks to protect the amenity of existing and future residents and support developments that do not result in unacceptable overlooking or loss of privacy or outlook; unacceptable loss of daylight and sunlight; and unacceptable levels of noise, vibration and

disturbance, whilst Policy D3 of the London Plan (Optimising site capacity through the design-led approach) states that development proposals should deliver appropriate outlook, privacy and amenity.

#### Outlook/privacy

- 6.8.3 The siting, height, massing and separation distances of the proposed educational building in relation to residential properties in the wider locality are such that the development would not materially harm the outlook or privacy conditions of the nearest residential occupiers to the development within Portland Place or Isobel Place.

#### Daylight/sunlight

- 6.8.4 Both the Haringey Local Plan and London Plan reference the Building Research Establishment (BRE), which provides guidance on site layout planning to achieve good sunlighting and daylighting. It is intended for building designers, developers, consultants and Local Planning Authorities (LPAs).
- 6.8.5 The application submission is accompanied by a sunlight and daylight report which provides an assessment of the proposal in terms of its relationship with existing neighbouring buildings which surround the site. The submitted report assesses the development against the BRE methodologies relating to daylight [Vertical Sky Component (VSC) and No Sky Line (NSL)], and overshadowing [sun on ground assessment] as well as information on sunlight [Annual Probable Sunlight Hours (APSH) and Winter Probable Sunlight Hours (WPSH)].
- 6.8.6 When considering the sunlight and daylight information relating to the impact of the proposal on the amenity of neighbouring properties, there were some results that had transgressions above the BRE guidelines. However, only 1 of these affected a habitable room within a residential building - being window 64 within no. 157-211 Portland Road – and this was a very minor transgression with a before/after ratio of 0.76 against 0.80 with regards to VSC measurement.
- 6.8.7 This is a very marginal shortfall, and serves a bedroom. The BRE guide explains that daylight in bedrooms is less important than in other habitable rooms such as kitchens and living rooms. The very heavily built up urban context of the site also needs to be taken into consideration, where there is more flexibility on what is perceived to be an acceptable level of daylight for residential development.
- 6.8.8 There are a number of windows within the D10 Studios and Firemen's Cottages buildings to the north of the site that would also fall below recommended before and after VSC levels in the BRE guidelines, but these windows serve commercial premises, and a number of the windows already have low VSC levels.
- 6.8.9 However officers consider that the impact on daylight is in accordance with BRE terminology would be that of a predominantly minor adverse impact. It should be noted that this limited impact does not apply across all of the tests

above to individual properties but rather in some instances of one or two of the tests above.

- 6.8.10 It is noted that properties to the north and northeast of Isobel Place have not been included in the report however given the distances from the site it is unlikely they would be impacted. On the basis of the submitted report, officers consider that the overall impact of the proposals in terms of the above tests would be at levels that are considered acceptable for a scheme of this nature that seeks to bring forward the delivery of a land use that is in need within the borough. As such, it is considered the predominantly minor impact on daylight could be outweighed by the public benefits of the scheme.

## **6.9 Highways and Transportation**

- 6.9.1 The NPPF (Para. 114) makes clear that in assessing applications, decision makers should ensure that appropriate opportunities to promote sustainable transport modes have been taken up and that the design of streets and other transport elements reflects national guidance (including the National Design Guide).
- 6.9.2 London Plan Policy T1 sets a strategic target of 80% of all trips in London to be by foot, cycle, or public transport by 2041 and requires all development to make the most effective use of land. Policy T5 encourages cycling and sets out cycle parking standards and Policies T6 and T6.1 to T6.5 set out car parking standards.
- 6.9.3 Other key relevant London Plan policies include Policy T2 – which sets out a ‘healthy streets’ approach to new development and requires proposals to demonstrate how it will deliver improvements that support the 10 Healthy Street Indicators and Policy T7 – which makes clear that development should facilitate safe, clean and efficient deliveries and servicing and requires Construction Logistics Plans and Delivery and servicing Plans.
- 6.9.4 Policy SP7 states that the Council aims to tackle climate change, improve local place shaping and public realm, and environmental and transport quality and safety by promoting public transport, walking, and cycling and seeking to locate major trip generating developments in locations with good access to public transport. This approach is continued in DM Policies DM31 and DM32.
- 6.9.5 DM Policy (2017) DM32 states that the Council will support proposals for new development with limited or no on-site parking where there are alternative and accessible means of transport available, public transport accessibility is at least 4 as defined in the Public Transport Accessibility Index, a Controlled Parking Zone (CPZ) exists or will be provided prior to the occupation of the development parking is provided for disabled people; and parking is designated for occupiers of developments specified as car-capped.
- 6.9.6 The new building will have a floor space of 2,625 sqm. As currently submitted, the development would increase the College’s on-site cycle parking capacity by 20 spaces. There are currently 17 car parking spaces located within the site that are to be removed and a further existing 20 to be retained that front onto the High Road. However, no new disabled car parking has been proposed.

- 6.9.7 Overall, the college employs 200 fulltime equivalent staff and 2,348 equivalent fulltime students study on the site. The submitted Transport Statement emphasises that although there is a substantial increase in floorspace between the existing and proposed building, there will be no uplift in student or staff numbers, with the increased floorspace required to meet the bespoke needs of the construction and engineering training facility. The long-term plan is for the existing construction and engineering building to the west of the site to be demolished in due course, with the students moved into the proposed building.
- 6.9.8 The site is near to the A10 High Road which forms part of Transport for London's Road Network. The development fronts onto Town Hall Approach, which is an adopted highway, and has a speed limit of 20 mph. A bus gate can be found south of the site at the junction with the High Road. The proposal site sits within the Seven Sisters Controlled Parking Zone (CPZ), which restricts parking to permit holders Monday to Saturday 08:00 – 18:30. The proposal site has a PTAL rating of 6a indicating that its access to public transport is excellent when compared to London as a whole, indicating that there are opportunities for trips to be made to and from the site by modes other than the private car.
- 6.9.9 The High Road gives convenient access to shops, services, facilities and transport links. The closest station is Seven Sisters Underground which is only around a 6-minute walk from the site. The entrance to the Overground from the station is slightly further away on Seven Sisters Road. Cycleway 1 is located outside of the development, and forms a key part of Transport for London's cycle network.

#### Car parking

- 6.9.10 The proposal does include the removal of 17 general parking spaces within the site itself. They are understood to be currently being used by staff; no information has been provided on where the trips themselves are likely to be displaced. The college will retain 20 car parking spaces including 3 disabled car parking spaces located in a car park that can be accessed from the High Road. The transport assessment concludes that these spaces would be sufficient for both the wider campus and the new building.
- 6.9.11 A parking survey has been provided in support of the planning application, the parking stress survey was conducted in the evening after local restrictions had ended, it utilised 6m car lengths for on-street counting, including a number of different bay types, and counted bays within local car parks. The survey found capacity within local car parks ranged from 30% - 68% and on-street resident bays within the Seven Sisters CPZ ranged from 78% - 86%. Overall, there appears to be more spare capacity within the local car parks than on-street, though this can be linked with drivers not having to pay for on-street bays.
- 6.9.12 No formal trip information has been received from the developer on this application, as they state the development will not see any increase in the number of students. Whilst it would be beneficial to have been provided with this information, it is acknowledged that the development is not proposed to increase student or staff numbers. From reviewing the results of the parking survey, it is considered that it has been satisfactorily demonstrated that there

is sufficient on-street parking capacity and in surrounding car parks to absorb any demand that is placed off the site for car parking, following the removal of the 17 spaces and the introduction of the improved facilities for building/engineering students at the college.

6.9.13 Transport policy still requires that new developments provide disabled parking, with the London Plan 2021 Policy T6.5 (Non-residential disabled person parking) requiring that education uses provide 5% designated bays of total parking and 5% enlarged bays. Therefore, the college will need to provide 1 additional disabled space to be in line with policy. This assessment has been based upon the 17 general car parking spaces left over as 3 within the car park have already been allocated as disabled bays. The policy does further explain that all proposals should include an appropriate level of disabled parking, with at least providing one bay.

6.9.14 This issue can be addressed by way of planning condition, which would reallocate one or more of the existing car parking spaces in the college site to form a disabled car parking space.

#### Trip generation

6.9.15 No formal trip information has been received from the developer on this application, as they state the development will not see any increase in the number of students. However, the development would result in an increase in floor area which from a transportation planning perspective could result in generation of additional trips to the site. Transport officers concluded that based on the submitted technical report which is supported by a survey and given the reduction in the onsite car parking space, the development is likely to have following mode share:

- Walk 25%
- Cycle 8%
- E Scooter 1%
- Bus 33%
- Rail (train/underground) 25%
- Car (as driver) 3%
- Car (as passenger) 5%

#### Cycle parking

6.9.16 There are currently only 50 cycle spaces that service the entire campus, that utilise a mix of both long-stay/short-stay parking types. The proposal is seeking to add an additional 20 cycle spaces, of which 4 would be long-stay and 16 short-stay. It has not been clearly stated how the proposed levels would conform to existing policy requirements within both the published London Plan 2021 Policy T5 Cycle and Transport for London's London Cycling Design Standards (LCDS).

6.9.17 Whilst Council Transportation Officers consider that the college has not provided sufficient cycle storage, or made sufficient effort to ensure the development meets London Plan 2021 standards, Transport for London's (TfL) comments welcomed this modest uplift.

- 6.9.18 Cycle parking provision for a college development is assessed against the London Plan 2021 Policy T5 Cycling parking standards for compliance Policy T5 Cycling requires that developments 'provide the provision of appropriate levels of cycle parking which should be fit for purpose, secure and well-located and be in accordance with the minimum standards. The requirements for Universities/Colleges are 1 space per 4 FTE staff + 1 space per 20 FTE students for long-stay, and 1 space per 7 FTE students for short-stay.
- 6.9.19 Officers acknowledge that if these figures were to be applied to the whole facility, both the existing and proposed cycle parking provision for the college is well below the minimum standards within policy T5. However, the college is an existing facility, and the proposed development will not increase student or staff numbers. As such, on balance, the additional 20 cycle-parking spaces are welcomed. Further details of the cycle storage shall be secured by condition.
- 6.9.20 It is also acknowledged that the Travel Plan will require monitoring of use of cycle parking provision, and that if capacity is exceeded, funding and space options within the campus will be considered in order to try and improve/increase cycle parking facilities.
- 6.9.21 The positioning of the currently proposed 20 additional cycle storage spaces is also acknowledged to be a sizable distance from the proposed building, but as the additional cycle space is proposed in association with an overall uplift in cycle parking provision across the college as a whole, this arrangement is considered to be acceptable. A condition is recommended to provided further details of the cycle parking spaces in line with London's London Cycle Design Standards (LCDS) before development commences on site.
- 6.9.22 It has been stated within the Transport Statement that the site currently has facilities for changing and showers on-site within the gym, with lockers for both staff and students. The condition and suitability of these facilities are not known given that the gym itself will be relocated and will have other uses. This is supported by TfL's own comments that highlight the absence of clarity as to whether the facilities will be satisfactory for the entire college and this development given its existing use as a gym. The provision of good changing facilities is supported by the TFL London Cycling Design Standards (LCDS) that recommends good cycle parking should be designed with this.
- 6.9.23 The applicant has confirmed that the changing and shower facilities are in the process of being re-provided within the main college building as part of wider re-location of the gym from the building that is proposed to be demolished. As such, it is envisaged that adequate changing room facilities shall be provided for cyclists within the college site.

#### Travel plan

- 6.9.24 A draft Travel Plan has been included within the submission. It has been provided as a site wide document that covers all employees and students, rather than limited to this application. This document unfortunately does not include any current trip information from the site; therefore, a baseline cannot

be currently seen until a formal document has been sent under a planning condition. It would have been more beneficial for surveys to have been undertaken and submitted with the application to give a better insight into the current models split from the site.

- 6.9.25 The Travel Plan includes incentives to increase the mode share of cycling to the site. Both walking and cycling only show an increase of mode share of 3% for staff and 0.75% for students from the baseline year into year 1, which is incredibly low given the site's connectivity to active travel infrastructure. A planning condition is proposed to be imposed on the development to provide an additional 77 cycle parking spaces within the college site, which would provide some capacity to cope with an uplift in students and staff cycling to/from the site in greater numbers.
- 6.9.26 The travel plan is looking to have a reduction of 8.5% of car use by staff by the first year, it can be assumed that this large success would be done through the removal of the 17 car parking spaces. However, no measures have been identified on how further reduction in use would be sought.
- 6.9.27 Overall, officers accept some of the content of the document, although the areas that have been highlighted will need to be substantially improved upon the receipt of a new document as part of the S.106 obligation. There will be a Travel Plan Monitoring Fee per year for the first 5 years for a college travel plan this will be covered by way of a S.106 obligation.

#### Servicing and delivery

- 6.9.28 The application does include a draft Service and Delivery Plan. Service and delivery access is currently done via the College's gated vehicle entrance from Town Hall Approach. it is normally used for the delivery of large goods and provides access to staff car parking for 17 vehicles. The college is currently serviced for waste and recycling, with other deliveries associated being with material and equipment for teaching and office supplies. The servicing area is to be retained, though there will be a loss of the 17 car parking spaces. However, this has not led to an increase in the area itself for servicing vehicles, this is because the yard area is to be reduced in size although the developer states there is still enough room for vehicles to manoeuvre internally. It is noted that a turning head is proposed to allow for a three-point turn manoeuvre to be undertaken in the site to leave in forward gear.
- 6.9.29 3 skips and 2 compactors are currently used to house the site's waste and recycling, when full they are removed by a vehicle. Current arrangements are to remain as they are presently. The larger vehicle type size ranges from 10.2m 18 tonne to an 8.9m 12 tonne box van, with the smallest being of 8m length. Swept path drawings have been provided showing a large 12m vehicle being able to turn on-plot and leave in a forward gear. Deliveries are to take place outside of the peak.
- 6.9.30 The submission of a Delivery and Servicing and Waste Management Plan shall be imposed by condition to be approved and in place prior to commencement of first occupation of the development. This will need to include details of refuse collections and service trips to the site, this must be



submitted and approved before the site is occupied and secured via a pre-occupation planning condition.

#### Construction Logistics Plan

- 6.9.31 A draft Construction Logistics Plan (CLP) has been received as part of the submission. The document covers some of the following: challenges, programme of works, vehicle routing/access, trip generation, and monitoring. Some issues have been identified and already raised with the applicant's transport consultants regarding vehicle manoeuvres and routing. The largest vehicle to visit the site would be a 16.5m HGV, it would need to reverse onto the site from Town Hall Approach by driving through the bus gate and then reverse whilst mounting the kerb and then block the CS1 cycle lane to leave in a forward gear from the site. This would increase road safety risk, as it could potentially cause a collision with both pedestrians and cyclists. Furthermore, unless reinforced, the kerb, concrete slabs and tarmac would become damaged from such heavy vehicles.
- 6.9.32 There are other concerns regarding some vehicle routing from the supplied swept path drawing of 16.5m HGVs proceeding onto/out of the junctions with Philip Lane/High Road and Philip Lane/Town Hall Approach. This is because vehicles proceed either near to or over hand onto the footway, meaning that these manoeuvres would have to be executed proficiently to prevent harm to pedestrians and other road user safety. The above would not be in accordance with the published London Plan 2021 Policy T4 Assessing and mitigating transport impacts which states that '*development proposals should not increase road danger*' and Policy T7 Deliveries, servicing and construction which states '*during the construction phase of development, inclusive and safe access for people walking or cycling should be prioritised and maintained at all times*'.
- 6.9.33 A more detailed draft of a worked-up Construction Logistics Plan will be required for review and approval prior to commencement of any site works. The applicant will need to liaise and discuss intended means of access and servicing the site from the Highway with Haringey Council's Network Management Officers, and the outcomes of these conversations will need to inform the finished CLP. Transport for London's borough Service Delivery Manager for buses should be consulted, as to prevent construction affecting local bus movement on Town Hall Approach.
- 6.9.34 A Road Safety Audit will need to be completed before any CLP construction can begin, as it will inform decision making on the movement of larger 16.5m HGVs. The Construction Logistics Plan (CLP) will be required to be submitted by the developer/applicant, which shall be secured by condition.
- 6.9.35 The developer/applicant will need to adhere to Transport for London's CLP guidance when compiling the document, construction activity should also be planned to avoid the critical school drop off and collection periods, the applicant will be required to pay a construction travel plan contribution of fifteen thousand pounds (£15,000) for the monitoring of the construction activities on site.

6.9.36 In conclusion, subject to compliance with conditions and securing the obligations and contributions as to be agreed via a S.106 agreement, the proposal will be acceptable with regards to highways, transportation and parking considerations.

## **6.10 Air Quality**

6.10.1 London Plan Policy SI 1 (Improving air quality) seeks to ensure that new development minimises increased exposure to existing poor air quality and makes provision to address local problems of air quality (particularly within Air Quality Management Areas (AQMAs)) and be at least “air quality neutral”.

6.10.2 Policy DM23 of the DM DPD states that all development proposals should consider air quality and be designed to improve or mitigate the impact on air quality in the Borough and improve or mitigate the impact on air quality for the occupiers of the building or users of the development. Air quality assessments will be required for all major development and other development proposals, where appropriate. Where necessary, adequate mitigation must be provided.

6.10.3 The Council’s Pollution officer has reviewed the submitted documents with regard to the above and has no objections subject to conditions securing and Air Quality and Dust Management Plan (AQDMP).

## **6.11 Land Contamination**

6.11.1 Policy DM23 of the DM DPD requires proposals to demonstrate that any risks associated with land contamination can be adequately addressed to make the development safe.

6.11.2 A Contaminated Land Assessment (CLA) has been submitted with the application. The Council’s Pollution Officer has reviewed the submitted documentation and raises no objections to this application. The Officer states that works shall cease if unexpected contamination is found until appropriate remediation is agreed with the Council. These steps can be secured by condition. Details of construction and demolition works must be submitted to the Council prior to the commencement of works to ensure that nearby residents and other receptors are adequately protected during these works, which can also be secured by condition.

## **6.12 Fire Safety**

6.12.1 In 2021 the Government introduced Planning Gateway One (PG1) for all ‘relevant’ developments i.e. new buildings that are 18 metres (or seven storeys) or greater in height and contain two or more dwellings or educational accommodation. PG1 requires a fire statement to be submitted with planning applications for these relevant developments and also establishes the Health and Safety Executive as a statutory consultee for relevant development. As the development in question does not contain either residential or educational accommodation (i.e. accommodation for students to board in), PG1 does not apply to the proposal.

6.12.2 Policy D12 of the London Plan requires all major development proposals to be submitted with a Fire Statement which has been prepared by a suitably

qualified third-party assessor, demonstrating how the development proposals would achieve the highest standards of fire safety, including details of construction methods and materials, means of escape, fire safety features and means of access for fire service personnel. Policy D5 of the London Plan also seeks to ensure that developments incorporate safe and dignified emergency evacuation for all building users.

6.12.3 The fire safety of the development would be checked at building regulations 'Gateway 2' stage. For the purposes of this application, the submitted Fire Statement confirms that the lift would be suitable for emergency evacuation, that fire service vehicles would be able to reach the new building from the access points around the building and that water sources for dealing with fires would be available either outside of or within the application site.

6.12.4 The Health and Safety Executive are not a consultee for non-residential buildings.

### **6.13 Equalities**

6.13.1 In determining this application, the Council is required to have regard to its obligations under Section 149 of the Equality Act 2010. Under the Act, a public authority must, in the exercise of its functions, have due regard to the need to:

- eliminate discrimination, harassment and victimisation and any other conduct that is prohibited by or under this Act
- advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it
- foster good relations between persons who share a relevant protected characteristic and persons who do not share it

6.13.2 The three parts of the duty apply to the following protected characteristics: age, disability, gender reassignment, pregnancy/maternity, race, religion/faith, sex and sexual orientation. Marriage and civil partnership status applies to the first part of the duty. Members must have regard to these duties in taking a decision on this application. In addition, the Council treats socioeconomic status as a local protected characteristic, although this is not enforced in legislation. Due regard must be had to these duties in the taking a decision on this application.

6.13.3 The development would provide an improved educational facility that would provide benefits for the local community including improving prospects for access to local jobs this would have a positive socio-economic impact.

6.13.4 The overall equalities impact of the proposal would be positive as any limited potential negative impact on people with protected characteristics would be both adequately mitigated by conditions and would be significantly offset by the wider benefits of the development proposal overall. It is therefore considered that the development can be supported from an equalities standpoint.

### **6.14 Conclusions**

- 6.14.1 The principle of the reprovion of education floorspace on the campus in the form of new and upgraded facilities is acceptable given the London Plan and Haringey Local Plan strategic policies promoting education and skills. The site is also located in an 'Area of Change' with excellent public transport accessibility within the Tottenham Area Action Plan which seeks to promote new infrastructure for education purposes, meaning it is an appropriate location for the enhancement of the existing educational facility.
- 6.14.2 The proposal will enable the college to continue and improve its effectiveness in the role of providing accessible and free/affordable courses in a range of subjects to young and adult students, enhancing employment opportunities for thousands of people across the borough.
- 6.14.3 Officers are satisfied that the proposed building would provide a satisfactory design response within the constraints of its surroundings that would respect the scale, form and character of the wider locality. The less than substantial harm to surrounding listed assets would be outweighed by the educational, social and economic benefits that would result from the introduction of this facility.
- 6.14.4 The proposed building has generally been designed to take account of climate change and to reduce carbon emissions, incorporating fabric efficiencies, on-site renewable energy generation in the form of solar PV panels, and heating, cooling and hot water provided through air source heat pumps. A section 106 planning obligation would secure a carbon offsetting contribution, subject to further detailed design development.
- 6.14.5 Subject to the recommended planning conditions and s106 planning obligations to secure necessary mitigation and policy objectives, officers consider that the proposed scheme is acceptable on its own merits, when considered against the development plan and all other material considerations.

## **7. COMMUNITY INFRASTRUCTURE LEVY (CIL)**

- 7.1 Neither the Mayoral of Haringey CIL charging schedules apply CIL contributions for net additional floorspace for educational use. As such, the Mayoral and CIL rate for the development would be nil.

## **8. RECOMMENDATION**

- 8.1 GRANT planning permission for the reasons set out in Section 2 above.