

REPORT FOR CONSIDERATION AT PLANNING SUB-COMMITTEE

1. APPLICATION DETAILS

Reference Nos: HGY/2024/3386

Ward: South Tottenham

Address: 312 High Road N15 4BN

Proposals

Change of use from former educational facility (D1 use class now replaced by new class F1) to short term emergency accommodation (sui generis use class). Proposal also includes erection of roof extension to the building with erection of two new single storey buildings to the rear. Provision of a new commercial use on part of the ground floor level.

Applicant: Mr Newton Gatoff

Agent: Mr Jerry Bell

Ownership: Private

Case Officer Contact: Kwaku Bossman-Gyamera

1.1 This application has been referred to the Planning Sub Committee for a decision as it is a major application that is also subject to a section 106 agreement.

1.2 SUMMARY OF KEY REASONS FOR RECOMMENDATION

- The proposed development provides specialist accommodation for single homeless people for which there is an identified need.
- The proposed change of use and refurbishment of the building will improve the internal and external quality and appearance of the site which is currently in a poor state.
- The proposed facility will provide an appropriate standard of accommodation for temporary accommodation for homeless individuals including for wheelchair users.
- The impact of the development on nearby residential amenity is considered acceptable.
- The proposal complies with transportation policy and caters for alternative modes of transport.
- The proposed development would be a high-quality design, of an appropriate scale in the existing urban context and would respect the visual amenity of the streetscape and locality.
- The proposed development would enhance and preserve the character of the conservation area including the significance of the nearby listed buildings.

- The development would achieve a reduction of 70% carbon dioxide emissions over Building Regulations Part L 2021 and provide appropriate carbon reduction measures plus a carbon off-setting payment.
- The applicant will continue to work with Metropolitan Police Designing Out Crime officers to ensure that the premises are appropriately safe and secure.
- The proposed development will secure several obligations including Local Housing Allowance (LHA) rates and first refusal option to mitigate the residual impacts of the development.

2. RECOMMENDATION

- 2.1 That the Committee authorise the Head of Development Management or the Director of Planning and Building Standards to **GRANT planning permission** subject to the conditions and informatives set out below and the completion of an agreement satisfactory to the Head of Development Management or the Director of Planning and Building Standards that secures the obligations set out in the Heads of Terms below.
- 2.2 That delegated authority be granted to the Head of Development Management or the Director of Planning and Building Standards to make any alterations, additions or deletions to the recommended measures and/or recommended conditions as set out in this report and to further delegate this power provided this authority shall be exercised in consultation with the Chair (or in their absence the Vice-Chair) of the Sub-Committee.
- 2.3 That the agreement referred to in resolution (2.1) above is to be completed no later than 6/11/2025 or within such extended time as the Head of Development Management or the Director of Planning & Building Standards shall in their sole discretion allow; and
- 2.4 That, following completion of the agreement(s) referred to in resolution (2.1) within the time period provided for in resolution (2.3) above, planning permission be granted in accordance with the Planning Application subject to the attachment of the conditions.

Conditions/Informative Summary - Planning Application HGY/2024/3386 (the full text of recommended conditions/informative is contained in Appendix 1 of the report.

Conditions

1. Three years
2. Drawings
3. Detailed Drawings and External Materials
4. Management Plan

5. Restricted Use
6. Hard and Soft Landscaping
7. Secure by Design Accreditation
8. Contaminated Land
9. Unexpected Contamination
10. Non-Road Mobile Machinery (NRMM)
11. Management and Control of Dust
12. Considerate Constructor Scheme
13. Delivery and Servicing Plan and Waste Management Plan
14. Cycle Parking
15. Electric Vehicle Charging
16. Entry Access Gate Arrangements
17. Accessible Parking Bays
18. Energy Strategy
19. Overheating Report
20. Living roofs
21. BREEAM Certificate
22. Archaeology
23. Commercial Unit – Noise Attenuation
24. Commercial Unit - Hours of operation
25. Accessible Accommodation
26. Refuse, Waste & Recycling Details
27. Extract flues/Fan
28. Fire Safety
29. CCTV (Pre Commencement)

Informatives

- 1) Positive and Proactive
- 2) Permission subject to a 106 legal agreement
- 3) CIL
- 4) Hours of Construction
- 5) Party Wall Act
- 6) Fire Brigade
- 7) Asbestos
- 8) Metropolitan Police Service Designing Out Crime
- 9) Written Scheme Investigation (Archaeological)
- 10) Thames Water
- 11) Shopfront Advertising Signs
- 12) Biodiversity Net Gain, 1/2
- 13) Biodiversity Net Gain, 2/2

Section 106 Heads of Terms - Planning Application HGY/2024/3386

1. Local Housing Allowance (LHA)

- Secure affordable housing subject to Local Housing Allowance (LHA) rates.

2. Service Users

- Nominations agreement to secure the occupation of the rooms within the facility in favour of Haringey residents based upon the following terms:
 - a. Any vacancy within the facility shall first be offered to the London Borough of Haringey Council.
 - b. Subject to paragraph (a) should the applicant receive written correspondence from the London Borough of Haringey Council that they have no need for any vacancy within the facility, or the London Borough of Haringey fails to provide a timely response, the applicant may market the vacancy more widely.
 - c. Before any placement is made, a full assessment is carried out as to the suitability of the placement (Details of screening and selection process).

3. Transport

- Car Free Agreement -The applicant is required to enter into a Section 106 Agreement to ensure that the residential units are defined as “car free” and therefore no residents therein will be entitled to apply for a residents parking permit under the terms of the relevant Traffic Management Order (TMO) controlling on-street parking in the vicinity of the development. The applicant must contribute a sum of £4000 (four thousand pounds) towards the amendment of the Traffic Management Order for this purpose.
- Construction Logistics and Management Plan - The applicant/developer is required to submit a Construction Logistics and Management Plan, 6 months (six months) prior to the commencement of development, and approved in writing by the local planning authority. The applicant will be required to contribute, by way of a Section 106 agreement, a sum of £15,000 (fifteen thousand pounds) to cover officer time required to administer and oversee the temporary arrangements and ensure highways impacts are managed to minimise nuisance for other highways users, local residents and businesses.
- Car Club Membership - The applicant will be required to enter into a Section 106 Agreement to establish a car club scheme, which includes the provision of three

years' free membership for all residents and £50 (fifty pounds in credit) per year/per unit for the first 3 years.

- Highways Improvement - The owner shall be required to enter into agreement with the Highway Authority under Section 278 of the Highways Act to pay for any necessary highway works, which includes if required, but not limited to, footway improvement works, access to the Highway, measures for street furniture relocation, carriageway markings, and access and visibility safety requirements.

4. Carbon Mitigation

- Be Seen commitment to uploading energy data.
- Energy Plan.
- Sustainability Review.
- Estimated carbon offset contribution (and associated obligations) of £17,385 (indicative), plus a 10% management fee; carbon offset contribution to be re-calculated at £2,850 per tCO2 at the relevant Energy Plan and Sustainability stages.

2.5 The above obligations are considered to meet the requirements of Regulation 122(2) of the Community Infrastructure Levy Regulations 2010 (as amended).

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

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

1. The proposed development, in the absence of a legal agreement failing to secure affordable housing subject to Local Housing Allowance (LHA) rates, the scheme would fail to foster mixed and balanced neighbourhoods where people choose to live, and which meets the housing aspirations of Haringey's residents. As such, the proposal would be contrary to London Plan Policies H4 and H5, Strategic Policy SP2, and DM DPD Policies DM11 and DM 13.
2. The proposed development, in the absence of a legal agreement securing the occupation of the rooms within the facility firstly in favour of Haringey residents, would undermine the aims and recommendations of Haringey's Housing Strategy and Older People Strategy. As such, the proposal is contrary to Policy DM15 of Development Management DPD 2017 and Policy SP2 of Haringey's Local Plan 2017.
3. The proposed development, in the absence of a legal agreement securing a development that is car parking permit free, would have an unacceptable impact on the safe operation of the highway network and give rise to overspill parking

impacts and unsustainable modes of travel. As such, the proposal is contrary to London Plan policies T1, Development Management DPD Policies DM31, DM32, DM48 and Highgate Neighbourhood Plan Policies TR3 and TR4.

4. The proposed development, in the absence of a legal agreement securing sufficient energy efficiency measures and a financial contribution towards carbon offsetting, would result in an unacceptable level of carbon dioxide emissions. As such, the proposal would be contrary to Policies SI2 of the London Plan 2021, Local Plan 2017 Policy SP4 and Policy DM21 of the Development Management Development Plan Document 2017.

2.8 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 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 Director within a period of not more than 12 months from the date of the said refusal, and
- (iii) The relevant parties shall have previously entered into the agreement contemplated in resolution (1) above to secure the obligations specified therein.

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3.0 PROPOSED DEVELOPMENT AND SITE LOCATION DETAILS

3.1 Proposed development

- 3.1.1 The proposal seeks planning permission for change of use from a former educational facility and refurbishment of the property, including a single-storey roof extension of the existing building, alongside the construction of two new single storey buildings to the rear, to provide short-stay emergency accommodation. There would be 52 units in total: 10 in the single storey new buildings and 42 in the refurbished and extended existing building. The units are intended to be single occupancy, for stays of between one night and a few months. Fifteen units would have level access and be large enough to accommodate wheelchair users. The proposed new build to the rear, together with the new roof extension amount to 460 sqm new floorspace.
- 3.1.2 The ground floor would provide a commercial café/restaurant and office space for support staff, as well as a utility room and ancillary spaces. External amenity space is proposed to be provided to the rear, together with 2 accessible car parking spaces to the rear within a landscaped courtyard and 8 cycle parking spaces. Internally there would be three amenity areas within the hallway for the ground, first and second floors. A lift would serve the upper floors of the main building.
- 3.1.3 Each unit is intended to be occupied by a single adult homeless person.
- 3.1.4 Haringey's Housing Strategy Team has confirmed that there is an identified need for this type of accommodation. The applicant has agreed that Haringey would have first refusal rights on referrals into the facility which will be secure by section 106 agreement. But agrees that there may be scenarios where they will accept referrals from other local authorities if they have no need for any vacancy. Nevertheless, Haringey would have a nomination rights agreement. Therefore, any vacancy within the facility shall first be offered to the Haringey.
- 3.1.5 It should be noted that the site would not operate as a 'walk-in' facility. The applicant has confirmed that the Council's specialist housing team would make suitable referrals into the facility and that a robust risk-assessment will be carried out prior to the arrival of each resident, to ensure that the resident is considered as 'low-risk'. Residents will be aware that the facility provides a temporary housing placement, and they will also be required to commit to engagement with staff who will assist them in securing subsequent housing solutions.
- 3.1.6 The applicant states that there would be at least two staff onsite at any one time, working in a shift pattern on a 24-hour basis. This would be secured in the management plan. The building will be secure, and it will be run and managed by an experienced team of staffs (well established provider of temporary accommodation). There would be a reception desk at the ground floor entrance, and the site would be monitored by CCTV.

3.1.7 The applicant runs a charity organisation known as the Joy Foundation. The foundation has been running a temporary accommodation establishment for vulnerable persons in various London Boroughs. The foundation has been a provider of temporary accommodation to Newham Council for over 30 years and is well established within that borough, providing accommodation to various services within Newham (Adults and Children's Social Services as well as Housing).

3.2 Site and Surroundings

3.2.1 The application site is located on the eastern side of the High Road in Tottenham along the busy thoroughfare with heavy traffic use - opposite Tottenham Green. The site is currently occupied by a three-storey building with a commercial use at ground floor. The building has been the subject of substantial alterations to the front façade and a single storey extension towards the rear of the building.

3.2.2 The development site is surrounded by some relatively well-preserved heritage buildings, such as the locally listed High Cross Church and Hall to the south of the development site, and locally listed Nos.318 to 322 and No. 324, located to the north of the development site.

3.2.3 The property is partially vacant, temporarily used by a number of churches (two or more), occupied on short term tenancies. Most recently the property could also be hired for learning and business meetings; and prior to this it was in use as a college, providing training facilities.

3.2.4 The property, known as 'Excel House', is located within the Tottenham High Road Historic Corridor (THRHC)/ Tottenham Green Conservation Area, but does not fall within a curtilage of a listed building.

Fig 1: site location in context



3.2.5 The site has a PTAL (Public Transport Accessibility Level) value of 6B, considered 'excellent' access to public transport services, the highest value achievable with the TfL WEBCAT assessment tool. There are 12 bus services within 2 minutes' walk of the site and multiple services from the bus stop adjacent to the site. Seven Sisters Station is 7 minutes' walk away, and South Tottenham and Tottenham Hale Stations 12 minutes' walk away. There are multiple shops and local community services accessible also within a short walk of the site.

3.2.6 The site is also within the Seven Sisters controlled parking zone (CPZ), which operates Monday to Saturday between 0800 – 1830.

3.3 Relevant Planning and Enforcement history

- 3.3.1 HGY/1995/1022 –Change of use of ground and first floors to Class D1 (Day Nursery, Education and Public Worship) – Granted 20/02/1996.
- 3.3.2 HGY/1992/0124 – Change of use of first floor to office training centre – Granted 09/03/1992.
- 3.3.3 HGY/1991/1279 – Change of use of second floor to office training centre – Granted 06/01/1992.

4. CONSULTATION RESPONSES

4.1 Quality Review Panel

- 4.1.1 The proposal was presented to Haringey's Quality Review Panel (QRP) on 2nd July 2025. The Panel offered their 'warm support' for the scheme, particularly the use of this site to provide much-needed emergency housing. A summary of the Panel's response is as follows:

The panel offers suggestions to support efficient delivery of the scheme, ensuring that resource is invested where it will add value to the residents' experience, and make management easier for the client.

By rationalising the ground floor plan, the scheme could deliver more for residents and reduce both build and running costs. This will also help the café to activate the high street frontage, helping with passive surveillance over the entrance sequence, and contributing to transforming the alleyway into a safe and welcoming access route. The internal circulation and meeting spaces should be inviting and straightforward to navigate and must also comply with fire regulations. The amenity strategy should offer shared spaces with varying degrees of privacy.

A landscape architects' input would be hugely beneficial at this design stage, before a planning application, as it could provide a site-wide strategy for public, private and semi-private spaces, as well as dealing with site edge conditions, and ensuring that parking, refuse and access are best accommodated to make the most of the site opportunities.

Residents' thermal comfort should be a priority for the sustainability strategy. Further work is needed to mitigate overheating across the scheme and its three conditions (heritage façade, existing building retrofit and new build). The new build structures should be far more ambitious in terms of sustainability and could work better as a single building.

The focus on single occupancy is appropriate, and the room sizes and layouts are successful. To make them exemplary, further detail should be developed to create a richer living experience, building on the client's understanding of resident needs,

especially regarding storage. Opportunities for residents to learn new skills could be embedded in the shared spaces, to support their journey to recovery, wellbeing and independence.

The restoration of the existing building's historic façade is fully supported, and the top floor extension works well. However, the architecture of the extension could be developed to contribute more to the local context. The design of the new buildings could also be refined, to make them feel like home for residents.

- 4.1.2 The detailed QRP comments and the latest officer response is provided within the design section of this report. (The QRP's full written response is included under Appendix 4).

Engagement

- 4.1.3 Following officer advice, the applicant presented the scheme to the Quality Review Panel, and to Members of the Planning Sub-Committee in July 2025. The applicant has also had several meetings with the Director/ Assistant Directors of supported housing and temporary accommodation, who have had the opportunity to consider the proposal and have paid a visit to a similar facility run by the applicant in the London Borough of Newham. Following these discussions, and consideration of the management plans for the proposal, they support the development and consider it would help meet the borough temporary housing need.

Planning Committee Briefing

- 4.1.4 The proposal was presented to the Planning Sub Committee at a Briefing in July 2025. The minutes are attached in Appendix 5.

4.2 Application Consultation

- 4.2.1 The following were consulted regarding the application:

(Comments are in summary - full comments from consultees are included in appendix 3)

INTERNAL:

LBH Design

Comments provided are in support of the development - *The proposed conversion and extension is supported in principle as a good use of land, for a desperately needed purpose in a location suited to this function, and although the external design, composition and materials can generally be considered a good design, especially the conversion and extension of the main frontage building, concern was*

raised that the proposal should be considered by the Quality Review Panel (QRP). This has since taken place, and they considered this development would deliver a high standard of temporary accommodation.

LBH Conservation

Comments provided are in support of the development - The proposed development is very welcome within the heritage context of the Tottenham Green Conservation Area, due to its potential to declutter, unveil and reinforce the historic character of the conservation area stretch comprised between Colsterworth Street and Monument Way. This scheme will cause no harm to the significance of surrounding heritage assets, and will likely enhance the quality of their setting, depending on detailed design and built quality.

LBH Transportation

No objections raised, subject to conditions and S106 - Overall this should result in a reduction of in person and vehicle trips to and from the site and given the site's nature and location the car free/parking permit arrangements are appropriate. Cycle parking is to be provided to meet London Plan numerical requirements, and a draft Construction Logistics Plan has been provided which indicates the main transportation aspects of the build out of the development.

LBH Waste Management

No objection, subject to condition.

LBH Air Quality/ Pollution

No objection, subject to conditions and informative.

LBH Carbon Management

No objections, subject to conditions and S106 obligations.

LBH Housing Strategy Team

In support of the development - Confirmation that there is an identified need for this type of accommodation.

LBH Arboricultural Team

No objection subject to conditions (further details requires with regards to species and after care programme).

LBH Community Safety Team

No objection in principle, concerns about the high crime volume in the area. But made three key observations:

- Identification of and risk assessment of those who may be placed into the accommodation.
- The cohorts of individuals likely to be placed, is there any further detail
- What mitigation will be in place, could be put in place to support occupants

Officer comment: these matters will be discussed and agreed between the applicant and the Council's temporary housing team, with support put in place via a management plan secured within this permission.

LBH Planning Policy

In accordance with Local Plan Policy DM15: Specialist Housing and London Plan Policy H12 Supported and specialised accommodation, there needs to be an identified/ established local need for the form of housing sought, having regard to the aims and recommendations of Haringey's Housing Strategy and Older People Strategy. The accommodation will need to be at a standard suitable for the intended occupiers. The Housing Strategy (2024-2029) confirms there is a strong need for suitable temporary accommodation. A robust assessment demonstrating how the proposal meets local needs and standards for temporary accommodation will be required, which should be informed by the recently adopted Housing Strategy, the Temporary Accommodation Placements Policy, which is in the process of being updated, and discussions with the Housing Strategy and Adult Social Care teams. This assessment should include the affordability of the proposed accommodation. The type of needs anticipated to be met through the proposed accommodation and how this responds to local needs i.e. is it for families, people with particular healthcare needs would be required. The assessment should also demonstrate how the proposal is suitable for people with those needs and meets the relevant standards. The Housing Strategy refers to the 'Setting the Standard' document, further criteria are outlined in the Temporary Accommodation Placements Policy, and the applicants have been provided with the Family Emergency Accommodation Guidance.

EXTERNAL

Metropolitan Police Designing out crime.

No objections, subject to conditions and informative. *The property is located in an area with high footfalls of traffic and a college nearby, resulting in higher levels of crime and anti-social behaviour. Applicant to ensure there is ongoing dialogue with our department continues throughout the design and build process. This can be achieved by Secured by Design conditions being applied. If the conditions are applied, we request the completion of the relevant SBD application forms at the earliest opportunity.*

Historic England/ GLAAS

No objections, subject to archaeological condition.

5. LOCAL REPRESENTATIONS

5.1 In terms of consultations:

- Neighbouring properties were sent letters
- Site notices were erected in the vicinity of the site
- A press notice was put into the local press

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

No of individual responses: 18
Objecting: 18

5.1.3 The issues raised in representations that are material to the determination of the application are set out in Appendix 3 and summarised as follows:

- Excel House provides safe space for many communities uses and rental spaces for small business/events. Therefore, the loss of these spaces would have a negative impact on the community and local business.
- Contemporary design of the proposed extension is out of keeping.
- Concerns with parking and traffic.
- Inadequate community consultation. (Officer comment: this is not a material planning consideration in assessing the proposal)
- Concerns with noise and disturbance associated with proposed use.

5.1.4 The following local groups/societies made representations:

- An objection was received from former secretary of the Tottenham Conservation Area Advisory Committee (TCAAC). Please note that TCAAC no longer exists.
- Welcome the proposal to restore original façade, but objects to new aluminium cladding to top storey and worried about noise complaints from future residents and asked for the proposed units to be sound insulated.

5.1.5 Comments on representations:

- Objector's comments are noted and the issues raised are addressed and considered in the main body of the report and as such conditions will cover issues relating noise and disturbance.

- Extensive consultation exercises were carried out as part of our statutory duties as Local Planning Authority; neighbour notification letters were sent out to all the adjoining occupiers including occupiers of the host building. Site notices placed within the vicinity of the application site and advertisement within the local newspaper (press notice). Issues concerning inadequate community consultation – this is not a material consideration that should affect the assessment of the proposal.

6. MATERIAL PLANNING CONSIDERATIONS

6.1 The main planning issues raised by the proposed development are:

1. Principle of the development and Land Use
2. Heritage and Conservation
3. Design and Appearance
4. Residential Accommodation
5. Impact on Neighbouring Amenity
6. Parking and Highways
7. Sustainability, Energy and Climate Change
8. Urban Greening, Biodiversity Net Gain, Trees and Ecology
9. Air Quality and Land Contamination
10. Fire Safety
11. Flood Risk and Drainage
12. Conclusion

6.2 Principle of the development and Land Use

6.2.1 Loss of existing college/training facility use (community facility)

6.2.2 National Planning Policy Framework (NPPF) and London Plan Policy, specify that Local Planning Authorities shall through their evidence base objectively assess the needs of the community in respect of housing, services, infrastructure and employment to ensure appropriate provision to meet local need. The Council has, based on evidence, formulated policy within its Local Plan to ensure the effective management of the delivery and retention of different land uses based on location and need.

6.2.3 Council's Policy DM49 of the adopted DPD, particularly point A & B states that:

A) 'The Council will seek to protect existing social and community facilities which meets the needs of the community'.

B) 'Where a development proposal may result in the loss of a facility, evidence will be required to show that:

a) The facility is no longer required in its current use.

- b) *The loss would not result in a shortfall in provision of that use; and*
- c) *The existing facility is not viable in its current use and there is no demand for any other suitable community use on the site’.*

6.2.3 The lawful use of the building is a training college facility; however, that has long ceased - over a decade ago.

6.2.5 The loss of educational facility would not undermine the needs of the local community or that of Haringey more generally. The previous training college was a small private institution; hence its loss would not have a significant impact on educational provision in the borough. In any event, the private institution who used to run the school has been absorbed at an alternative site in the borough.

6.2.4 The property is currently partially vacant and temporarily used by two churches and including hired spaces for learning and business meetings. These community uses currently occupying the building on a temporary basis via short-term leases known as ‘meanwhile uses’ and are intended to fill vacant spaces until the landlord is ready for permanent redevelopment of the site. This arrangement has mutual benefit, providing the community with temporary space while offering the landlord interim income and helping prevent a vacant property from falling into disrepair. The temporary nature of the lease ensure that it does not hinder the eventual, long-term redevelopment of the site. On this occasion, the loss of the temporary uses on site, to enable the benefits of the proposed use to provide much needed emergency accommodation hub for 52 homeless persons, is considered acceptable.

6.3.1 **Proposed Emergency Accommodation**

6.3.2 At a national level the National Planning Policy Framework (NPPF) at Chapter 5 has specific regard to housing stating that ‘to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment...[and] within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies’.

6.3.3 Development Management DPD Policy DM15: Special Needs Housing states that:

A) ‘proposals for development that would result in the loss of special needs housing will only be granted permission where it can be demonstrated that there is no longer an established local need for this type of accommodation or adequate replacement accommodation will be provided’.

6.3.4 In this instance, the building on site has not been used or occupied as a special needs housing facility. There is, however, a demonstrable local need for the accommodation proposed.

6.3.5 B) 'The Council will support proposals for new special needs housing where it can be shown that:

- a. There is an established local need for the form of special needs housing sought having regards also to the aims and recommendations of Haringey's Housing Strategy and Order People Strategy;
- b. The standard of housing and facilities are suitable for the intended occupiers in terms of:

- i The provision of appropriate amenity space, parking and servicing;
- ii The level of independence; and
- iii Level of supervision, management and care/support.

C) There is a good level of accessibility to public transport, shops, services and Community facilities appropriate to the needs of the intended occupiers; and

D) The impact of the proposed development would not be detrimental to the amenity of the local area or to local services'.

6.3.6 It is evident that there is a pressing local need for accommodation of the type proposed. Notwithstanding the Council's own records which confirm this, the applicant has provided a detailed analysis of such evidenced need.

6.3.7. The application was accompanied by a Planning Statement which provides justification for the need of the proposed emergency accommodation in Haringey. The documentation submitted contains references to various sources of data which illustrate the issue of homelessness across the country as well as the borough.

6.3.8 Haringey Council's homelessness strategy 'Preventing Homelessness and Rough Sleeping Strategy 2023 – 2027' states that: in 2024/25 there were 1,098 single adult households that were assessed by Housing Needs as being statutory homeless, with a duty on Haringey to relieve their homelessness. 142 (13%) of these had a priority relating to physical illness or disability.

6.3.9 A total of 271 single adult households entered temporary accommodation in 2024/25 under either an interim or main housing duty. Only 35% of these were placed within Haringey, mainly due to a lack of suitable available accommodation within the borough.

6.3.10 There are currently 863 single adults in Bands A and B (indicates extremely urgent or critical housing need) on the Housing Register, with a further 5,675 in Band C (medium or low priority).

6.3.11 Officers note that corroboration of support for the proposed emergency

accommodation for homeless was expressed by the Council's Adults and Health, Commissioning Health & Social Care services. The proposed accommodation would complement the Council's Homelessness and Rough Sleeping Strategy to reduce homelessness and rough sleeping across the borough.

6.3.12 The proposal would not only provide much needed accommodation for homeless people in the borough but would also improve the internal and external quality of the site which is currently in a poor state. This scheme will provide much needed quality of accommodation in a market sector where quality is becoming increasingly difficult to procure.

6.3.13 The proposed development will be situated in a local centre High Street location with good access to shops and public transport which will be of benefit to the staff and residents. The proposed accommodation would benefit from a range of facilities such as a café enabling residents to socialise together and with members of the wider public. In addition to that, a communal private landscape garden is proposed which would contribute to social interactions and provide the opportunity for engagement among the residents. Appropriate amenity space, parking and servicing will be delivered, subject to details being finalised by conditions. Appropriate supervision, management and care/support will be secured in the Management Plan. The impact of the proposed development would not be detrimental to the amenity of the local area or to local services, subject to conditions being adhered to.

6.3.14 The loss of the existing uses on site is not considered to breach the policies of Development Plan Document or the London Plan and as such this loss of temporary nature of uses is considered acceptable in principle.

6.3.15 The provision of emergency accommodation in this location would accord with the Local Plan's aspirations for ensuring mixed and balanced communities exist. Officers consider that the proposed facility meets an identified need, and the criteria set out in Policy DM15 of the Development Management DPD, and on this basis the proposal should be supported in principle.

6.4 Heritage and Conservation

6.4.1 London Plan Policy HC1 seeks to ensure that development proposals affecting heritage assets and their settings, should conserve their significance. This policy applies to designated and non-designated heritage assets. Local Plan Policy SP12 and DMDPD Policy DM9 set 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.

6.4.2 DPD Policy DM9 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; setting out a range of issues which will be taken into account. In relation to extensions or alterations to residential buildings, including roof extensions, Policy DM9 requires proposals to be of a high, site specific, and sensitive design quality, which respect and/or complement the form, setting, period, architectural characteristics, detailing of the original buildings, including external features such as chimneys, and porches. The policy also requires the use of high-quality matching or complementary materials, in order to be sensitive to context.

6.4.3 *Legal Context*

6.4.4 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"

6.4.5 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."

6.4.5 The application site is located within Tottenham Green / THRHC Conservation Area and is an early-20th century commercial building that has been clad in the last decades with a curtain wall façade which is considered to detract from the character of the Conservation Area. The development site sits on the east side of the High Road where it is surrounded by some relatively well-preserved heritage buildings such as the locally listed High Cross Church and Hall to the south of the development site, and locally listed Nos. 318 to 322 and No.324, located to the north of the development site.

6.4.6 The immediate neighbour to the north is at No. 316, this is a late-20th century addition, it is of note only for the blue plaque put up by the London Missionary Society in 1949 on the previous building. Further to the north, at No. 318, is a late-19th century two-storey yellow stock brick building with a parapet and hipped slate roof set back from its neighbours. The building at No. 320, of mid-19th century appearance, has a parapet, a splayed corner, and sash windows with glazing bars, stucco surrounds, pilasters and pediments. The inter-war shop front has granite

stall risers and a recessed entrance with a black and white chequer tile floor inset with a mosaic monogram.

- 6.4.7 Locally listed property at No. 324 dates from c.1900 and is in red brick with buff-coloured faience blocks forming a framework of pilasters, parapet cornice and banding. The façade retains a largely intact original timber shop front and surrounds with Corinthian pilasters, partially hidden by modern signage and cabling. Altogether, the heritage buildings neighbouring the development site concur to illustrate the character of the earlier period of the area and complement the spacious, civic character of the Tottenham Green and Townhall approach.
- 6.4.8 The assessment of the original design quality and façade conditions of the existing building has been fully embraced, and this approach has positively resulted in a design for the retention, reconfiguration and extension of the existing three storey brick building, while decluttering, unveiling and reinstating the original design of its facades which is fully supported. The design proposal rests on a good understanding of the original design and character of the building, and by a discerning analysis of its built historic context, including its more or less successful alterations.

Fig 2 Original front façade





Fig 3 Existing pink and grey cladding

- 6.4.9 As part of a conservation-led, heritage-sensitive approach, the proposed zinc-cladded, roof extension will be sensitively well-set back from the main street frontage and will sit behind an extended parapet that will help reduce the visible and perceived increase in height and bulk of the existing building. The additional storey will have a very modest impact on the unveiled historic character of the host building and on the setting of surrounding heritage assets, and will acceptably blend in with the varied age, design and height of the street frontage that already characterises the eastern side stretch of the High Road comprised between Colsterworth Street to the south and Monument Way to the north.
- 6.4.10 The two new single storey buildings proposed to the rear of the existing building, together with the landscape design, will complement the proposed design and uses of the existing building.
- 6.4.11 The proposed development is very welcome within the heritage context of the Conservation Area, due to its potential to declutter, unveil and reinforce the historic character of the conservation area stretch comprised between Colsterworth Street

and Monument Way. This scheme will cause no harm to the significance of surrounding locally listed buildings and will enhance the quality of their setting.

6.4.12 Although the building would appear prominent in views from within the conservation area, and within this heritage context (and that of the locally listed buildings adjoining), the increase of the building's height and scale into the setting of the conservation area is acceptable. The scheme represents high quality contemporary design, use of quality materials, and positive visual amenity benefits brought by new landscaping design.

6.4.13 It is therefore considered that there would be no significant harm to the setting of the conservation area. The proposal would preserve and enhance the character and appearance of the conservation area and special architectural and historic building in the locality. Accordingly, the Officers support the application from a heritage and conservation perspective.

6.5 Design and Appearance

6.5.1 The NPPF 2024 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. The NPPF further states that proposed developments should be visually attractive, be sympathetic to local character and history, and maintain a strong sense of place.

6.5.2 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.

6.5.3 Policy DM1 seeks to secure the highest standard of design which respects local context and character to contribute to the creation and enhancement of Haringey's sense of place and identity. DPD Policy DM1 'Delivering High Quality Design' requires development proposals to meet a range of criteria having regard to the following: building heights; form, scale and massing prevailing around the site; urban grain; sense of enclosure and where appropriate following existing building lines; rhythm of neighbouring or local regular plot and building widths; active, lively frontages to public realm; and distinctive local architectural styles, detailing and materials.

Quality Review Panel (QRP) Comments:

6.5.4 The Quality Review Panel (QRP) has assessed the scheme in full at planning application stage in July 2025.

6.5.5 The full QRP report is attached in Appendix 4. The Quality Review Panel's summary of comments is provided below:

The panel offers suggestions to support efficient delivery of the scheme, ensuring that resource is invested where it will add value to the residents' experience, and make management easier for the client.

By rationalising the ground floor plan, the scheme could deliver more for residents and reduce both build and running costs. This will also help the café to activate the high street frontage, helping with passive surveillance over the entrance sequence, and contributing to transforming the alleyway into a safe and welcoming access route. The internal circulation and meeting spaces should be inviting and straightforward to navigate and must also comply with fire regulations. The amenity strategy should offer shared spaces with varying degrees of privacy.

A landscape architect's input would be hugely beneficial at this design stage, before a planning application, as it could provide a site-wide strategy for public, private and semi-private spaces, as well as dealing with site edge conditions, and ensuring that parking, refuse, and access are best accommodated to make the most of the site opportunities.

Residents' thermal comfort should be a priority for the sustainability strategy. Further work is needed to mitigate overheating across the scheme and its three conditions (heritage façade, existing building retrofit and new build). The new build structures should be far more ambitious in terms of sustainability and could work better as a single building.

The focus on single occupancy is appropriate, and the room sizes and layouts are successful. To make them exemplary, further detail should be developed to create a richer living experience, building on the client's understanding of resident needs, especially regarding storage. Opportunities for residents to learn new skills could be embedded in the shared spaces, to support their journey to recovery, wellbeing and independence.

The restoration of the existing building's historic façade is fully supported, and the top floor extension works well. However, the architecture of the extension could be developed to contribute more to the local context. The design of the new buildings could also be refined, to make them feel like home for residents.

6.5.6 Following the Quality Review Panel meeting, the agent and applicant were advised to consider the comments and revise the scheme.

6.5.7 Detailed QRP comments from the July 2025 review together with the officer comments based on the latest proposal are set out below:

Panel Comment	Officer Response
Ground Floor	

<p>The panel supports the provision of a café. This will address the lack of café options in the local area, activate the High Road frontage, and help with passive surveillance. It will also offer residents a convenient place to gain confidence in their ability to socialise in public spaces.</p> <p>The panel has significant concerns about the safety of the pedestrian and vehicle entrance off High Road, which is via an enclosed alleyway. While this will have CCTV, the under-croft space is dark even during daylight hours, and the café use will not provide additional overlooking at night. Locating the entrance foyer/waiting room adjacent to the alleyway will help with both daytime and nighttime surveillance.</p> <p>The alleyway will be gated for resident access only, but could still present a risk for vulnerable residents arriving home. It is important that it does not encourage antisocial behaviour or enable people to linger undetected.</p> <p>Further work is critical to improve the condition of the alleyway and ensure a safe and welcoming entrance experience. If possible, the bin store should be relocated as part of this so that residents do not have to walk past it on their way home.</p>	<p>Noted.</p> <p>To address this the applicant has proposed to install Victoria bevel edge glazed tiles/ceramic tiles to all wall to a height of 1800mm above finished floor level. A new ornate entrance gate including mesh ceiling with improved lighting.</p> <p>An entry access gate arrangement will be installed – details of this will be secured by condition.</p> <p>As a response to QRP comments the applicant has proposed large ceiling lights with rendered remaining walls and ceiling. The three existing apertures in the boundary wall will be extended to Damp Proof Course (DPC) level and infilled with decorative security mesh. Reception windows are added for internal to external connection.</p> <p>Furthermore, the café wall facing the alleyway will have 3no. matching windows to that of the boundary apertures. This will afford views from the café as well as streams of sunlight. Light coloured paving flags will be installed.</p>
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<p>There should be an active, open entrance foyer with natural surveillance created by a series of communal and support spaces, becoming more private as residents move eastwards towards their individual rooms.</p> <p>At present, the location of the café prevents this arrangement and compromises the layout by subdividing the ground floor. This means that staff must manage three separate entrances: the first entry point from High Road into the waiting room to the north of the café, the residents' regular entrance via the alleyway to the south of the café, and the communal entrance to the east of the bin store.</p> <p>The panel recommends moving the café to the northern side of the High Road frontage, moving the waiting room and associated staff and communal spaces to the south, combining the entrances, and rationalising the circulation spaces.</p> <p>This would allow surveillance of a single shared point of entry, improving safety and building management. It would also reduce the amount of space given over to corridors.</p> <p>The panel understands that the complex ground floor layout is a result of working with an existing building. However, it is important in an emergency housing scheme that the internal layout is not challenging to</p>	<p>Same as above. The entrance has been redesigned to accommodate these comments.</p> <p>As a response to QRP comments the café location has been moved north to accommodate these and now fronts the High Road.</p> <p>As above.</p> <p>Noted.</p>
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<p>navigate and creates a place of sanctuary for residents.</p> <p>The bicycle store also takes up valuable indoor space. This should be relocated to a secure outdoor structure so that the internal ground floor space can be prioritised for support services.</p> <p>For example, the ground floor should have a crisis space with a shower and bathroom to address the needs of residents on first arrival, potentially direct from sleeping rough.</p>	<p>As a response to QRP comments the applicant has revised the scheme – the cycle store and refuses stores have been moved to the rear of the site.</p> <p>As a response to QRP comments the applicant has incorporated a meeting room which has a shower and can double up as a crisis space.</p>
<p>Landscape and amenity</p> <p>The panel recommends looking at the site from first principles in terms of constraints and opportunities. There should be a site-wide strategy to deal with parking, entrance sequence, refuse, bike storage, maintenance, staff, visitor and resident access. The panel recommends appointing a landscape architect who can help develop the site strategy.</p> <p>Access to green outdoor amenity space will be essential to resident wellbeing, improving their physical and mental health. A landscape architect will be able to design for variety and richness, while ensuring that the spaces can be managed effectively and maintained easily, to make the most of the communal garden to the rear – which is a positive feature.</p> <p>Given that the three parking spaces are for servicing, maintenance of the building and social worker visits, they are unlikely to all be in use at the same time for long stays. The panel</p>	<p>The applicant has appointed a landscape architect to review and consider the QRP comments and help develop the site strategy.</p> <p>As a response to QRP comments the applicant has revised the scheme and as such a landscape architect has designed an outdoor space to reflect QRP comments. Condition recommended to cover landscape matters.</p> <p>As a response to QRP comments the applicant has reduced parking spaces to two vehicle spaces which allows the green space to be enlarged.</p>

<p>therefore suggests rationalising the parking strategy, so it has less impact on the landscaping.</p> <p>The project team should test solutions where parking is moved to the south, away from the central garden; or where parking is more integrated into the landscape design.</p> <p>The panel is concerned that the gap between the rear of Buildings B and C and the site boundary will create a strip of wasted space. This is likely to gather litter, and could be a vermin, security and fire risk, particularly if residents smoke and drop cigarettes into this gap.</p> <p>While the requirement for maintenance access is understood, the panel also thinks that this strip of land could cause issues with the existing neighbours with private gardens immediately to the east.</p> <p>The panel asks for further work to develop a strategy for the site edges that will address these concerns. These areas could be gated, offering managed biodiversity. Alternatively, the building footprints could be positioned right up to the site boundary. The level change between the private gardens and the site would be a benefit for this solution.</p>	<p>As a response to QRP comments the applicant has incorporated car parking to the south boundary which only works when two car park spaces are provided which has been redesigned to provide a flexible arrangement. Highways are satisfied with the new provision.</p> <p>As a response to QRP comments blocks B and C have been pushed back onto the boundary, which enlarges the green space (landscape area) and removes wasted space. Block C southern wall is retained approximately 900mm from the Church boundary to avoid conflict with a church window.</p> <p>Noted.</p> <p>Noted.</p> <p>To address this point the applicant has revised the landscape plan and an</p>
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<p>The panel understands that this user group has varied, but specific and complex needs, with many of those accessing emergency housing leading solitary lives. The amenity strategy should clearly respond this.</p> <p>The panel suggests developing a diagram to demonstrate the range of spaces from the public café to the private rooms, and the shared spaces in between. This will show how the scheme offers residents opportunities to interact with others in spaces of different degrees of intimacy, helping them to build up their confidence and social skills.</p> <p>The panel understands that too many amenity spaces would be difficult to manage. It recommends providing spaces within the garden that briefly bring people together enroute to their private rooms for moments of interaction.</p> <p>The panel encourages the project team to add some defensible space outside residents' ground floor windows. A small strip of planting would move people using the footpaths away from individual windows, offering some protection and privacy, which is particularly important for this user group.</p> <p>The covered walkways do not represent good value for money. The extent of the canopies should be reduced to only cover the areas directly over residential entrances. Alternatively, they could be removed, and the entrances could be recessed. This will create a moment of generosity for residents arriving home when it is raining, while saving costs.</p>	<p>improved green space has been provided.</p> <p>Noted.</p> <p>To address this point the applicant has brought on board a landscape architect who has redesigned the amenity space which provides interaction among the residents.</p> <p>As a response to QRP comments planter boxes are proposed to be installed to all ground floor windows.</p> <p>As a response to QRP comments, the covered walkway has been removed and small individual porches added to each ground floor entrance door. A large canopy is also proposed to the principal rear entrance.</p>
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<p>Sustainability</p> <p>The panel asks for more detail on the sustainability strategy to be included in the planning submission materials. This will provide Haringey Council with confidence that sustainability has been fully considered and integrated. It should include the daylight and sunlight testing of the internal rooms and external amenity spaces.</p> <p>Given the potential for residents to have complex needs or to have experienced challenging living conditions, it is essential that the rooms provide a safe, comfortable, private environment to aid their recovery and wellbeing.</p> <p>As many of the rooms are single aspect, overheating is likely in some locations. The panel asks for more work to develop an effective overheating strategy, in balance with natural light.</p> <p>The application of brise soleil needs further thought as it is likely to conflict with heritage requirements, especially on the western High Road elevation. The panel suggests developing a diagram to inform the location of brise soleil, helping to ensure comfortable internal conditions.</p> <p>The rooms facing west in the top floor extension are particularly at risk of overheating due to their orientation and full height windows. Windows with a higher sill would allow sufficient daylight into the rooms but with a greatly reduced risk of overheating.</p>	<p>To address this point the applicant has submitted sustainability, sun and daylight, energy and overheating reports which are supported by the Design and Climate Change Officers. The detail contained within these reports would be secured by conditions.</p> <p>To address this, point the applicant has submitted various reports and models which demonstrate that the standard of accommodation will be of high quality.</p> <p>To address this, point the applicant has provided a detailed overheating report which is supported by the Council's Climate Change Officer. In addition, the roof extension windows have been reduced in size by about 30%.</p> <p>As a response to QRP comments, brise soleil will not be installed on the front elevation heritage asset and southern boundary abutting the church boundary. All other windows will have brise soleils.</p> <p>Noted, agreed and windows reduced in size by 30%.</p>

<p>There is an opportunity for the new build parts of the scheme to achieve far more in terms of sustainability, as they do not need to be retrofitted or to address heritage concerns. The panel asks for further work on this.</p> <p>The panel suggests rationalising Buildings B and C into a single 'L'-shaped building. This would reduce the extent of external envelope, reducing cost, improving thermal efficiency, and working with the site layout. This option should be tested alongside the panel's suggestions for the courtyard landscaping and parking arrangement to ensure that they work together.</p> <p>There is potential to find efficiencies in the retrofit of the existing building. The project team should overlay the existing and proposed plans to scrutinise where money and materials could be saved by working closely with the existing layout.</p>	<p>Noted.</p> <p>To address this point the applicant has redesigned building B and building C to form an L-shape building.</p> <p>The applicant has been able to demonstrate that the existing building, when stripped out, would be an open space with columns on a grid plus and retains the existing staircase. This affords the proposed layout to be efficiently installed as proposed.</p>
<p>Internal circulation and shared space</p> <p>The panel is concerned that the internal layouts do not meet current fire regulations. For example, there is no fire protected lobby around the lifts and no secondary means of escape from all internal spaces. The project team should check that the fire strategy has been fully addressed and integrated into the floor plans.</p> <p>The meeting rooms should allow views out, perhaps through glazed panels to ensure those inside feel safe while offering them privacy</p>	<p>To address this the applicant has provided a fire consultant's report. However, the staircase and lobby now would have additional doors forming a protective area. The detail of the fire report will be secured by condition.</p> <p>As a response to QRP comments, all meeting rooms would have glazed walls with internal blinds for privacy, when needed.</p>

<p>The panel asks for further work to make the internal circulation more inviting, particularly the ground floor arrival sequence. The internal routes should be as straightforward as possible, corridor widths should be more generous, and consideration should be given to views at the end of corridors, helping with orientation and making them less intimidating.</p>	<p>Noted, the sequence of space starts at the entrance to the reception office, glazed security allows slight lines to the lift with meeting rooms following on. The existing lightwell is to become a green planted area with windows into the space from the corridor and meeting rooms. The secondary access will have partly glazed doors and a screen to afford visual connection into internal spaces.</p>
<p>Quality of accommodation</p>	<p>Noted.</p>
<p>It is positive that the project team is focusing on single occupancy rather than family accommodation, as it is not appropriate to mix the two user groups, and the scheme is not suitable for families in its current arrangement.</p>	<p>Noted.</p>
<p>The dimensions of the rooms and internal furniture layouts work well. The sample scheme completed by the same applicant also shows a quality of internal fit-out beyond the norm for emergency accommodation.</p>	<p>Noted.</p>
<p>The client has extensive experience delivering and managing emergency housing and demonstrates a deep understanding of the occupants' needs. It is important that this is communicated in the planning submission, or in any future review materials, to build council and panel confidence in the proposal.</p>	<p>Noted.</p>
<p>To make the scheme exemplary, the project team is encouraged to invest more time developing the detail of the room layouts. These should build on the client's experience of how</p>	<p>To address this the applicant has provided a typical detailed layout of each room which provides exceptionally level of quality</p>

<p>residents will live here, offering an environment where they can recover and gain independence.</p> <p>The project team should consider providing more storage for belongings, and spaces for activities such as drying clothes, eating, reading, and writing job applications within the privacy of their individual rooms.</p> <p>With careful design, these ambitions could be achieved in a low-cost way within the same room sizes – for example, by building in storage under the window sills. This would create a transformational experience for residents who may have previously been homeless. It would also provide a richer living experience, encouraging residents to feel pride in the spaces they inhabit.</p> <p>The panel also recommends embedding opportunities for residents to learn and develop in the communal spaces. For instance, if residents were allowed to use the laundry room, it would offer those who are willing and able the agency to look after themselves and meet other people in the process.</p> <p>This would help to address the stigma often associated with emergency accommodation tenants and support them on their journey into settled sustainable housing.</p>	<p>accommodation higher than average standard for single occupancy.</p> <p>Each room is for an individual. The studios will each have a wardrobe, kitchenette, table, chair, bed, bed-side table, drawer unit and en-suite. There will be a washer and dryer on site and the en-suite can be further used for drying clothes if necessary. Meeting rooms can be booked if an occupant requires specific additional space.</p> <p>Noted. There is no standard to apply in this case, however the size, design and quality of the rooms/spaces is considered acceptable. In terms of gross internal area, all of these rooms would exceed London Plan space standards for single person occupancy (that is, all bedrooms units have a gross internal area ranging from 14sqm to 27sqm). All rooms would exceed minimum floorspace standards for double bedrooms (that is, floorspace of at least 11.5sqm).</p> <p>To address this, the applicant has provided an external communal garden space in a form of landscape garden and internal communal space all floors including private meeting rooms. This would contribute to social interactions and provide the opportunity for engagement among the residents.</p> <p>Noted.</p>
<p>Response to heritage</p>	

<p>The panel welcomes the removal of the 1970s cladding from the front and side elevations of the existing building, and the restoration of these façades to their original historic condition. This will contribute to the local townscape and the setting of the Tottenham High Road Historic Corridor/Tottenham Green Conservation Area.</p> <p>It would be good to understand the project team's analysis of the wider area, to ensure that the heritage response is informed by contextual research. This should also aid decision making, ensuring that money is invested where it will contribute the most value in terms of the building's character and context.</p> <p>Special attention should be placed on ensuring resident comfort within the rooms facing the High Road, to deal with sustainability considerations including overheating, given the heritage context.</p>	<p>Noted.</p> <p>The front elevation will be restored contributing to the heritage of the building and the wider conservation area.</p> <p>To address this the overheating details has been secured by condition.</p>
<p>Architecture</p> <p>The panel is comfortable with the proposed architecture but suggests including a fuller explanation of the design approach as part of the planning submission documents.</p> <p>The setback and mansard design of the single storey roof extension are successful.</p> <p>Further detailing to give the top floor extension more character and refinement would improve the building's external appearance and</p>	<p>The design approach is supported by officers. As part of the pre-application discussion with the conservation officer, details of materials, and colour of external finishes were agreed and would be secured by condition.</p> <p>Noted.</p> <p>Noted.</p> <p>The use of good quality zinc cladding and proportion of window detailing is successful contemporary interpretation of these historic characteristics that</p>

the way it sits in the High Road heritage setting.	integrates new development into the local area.
The detailing and material quality of the new build elements could also be improved, especially as they are not prefabricated. This would help to create a sense of pride for residents.	Comments supporting the detailed design of the proposed development overall are noted. High quality materials would be secured through a condition.

6.5.8 As set out above, the applicant has sought to engage with, and positively respond to, the QRP and their comments. The panel had expressed that they would welcome an opportunity to comment on the scheme again, once the design had progressed in consultation with planning officers. However, Officers are confident that the scheme has progressed positively and QRP comments have been addressed to an appropriate extent without the need to return for another design review.

6.6 Design, Form, Bulk and Massing

Restoration of the front facade

6.6.1 The proposal involves removal of the existing cladding façade to reveal the original bricks underneath and retained where possible unless it is damaged beyond repair. Replace with reconstituted stone in a colour that matches the window reveals and lintels. This approach offers a unique opportunity to retain the original character of the building. The proposal would help achieve the building's long-term integrity and restore its external heritage frontage quality which would preserve and enhance the character and appearance of the of this conservation area. The design has evolved through multiple iterations, incorporating feedback from both the Quality Review Panel (QRP) and planning, design and conservation officers, resulting in improvements to massing, architectural expression and detailing.

Fig 4 Restored heritage frontage



Roof extension

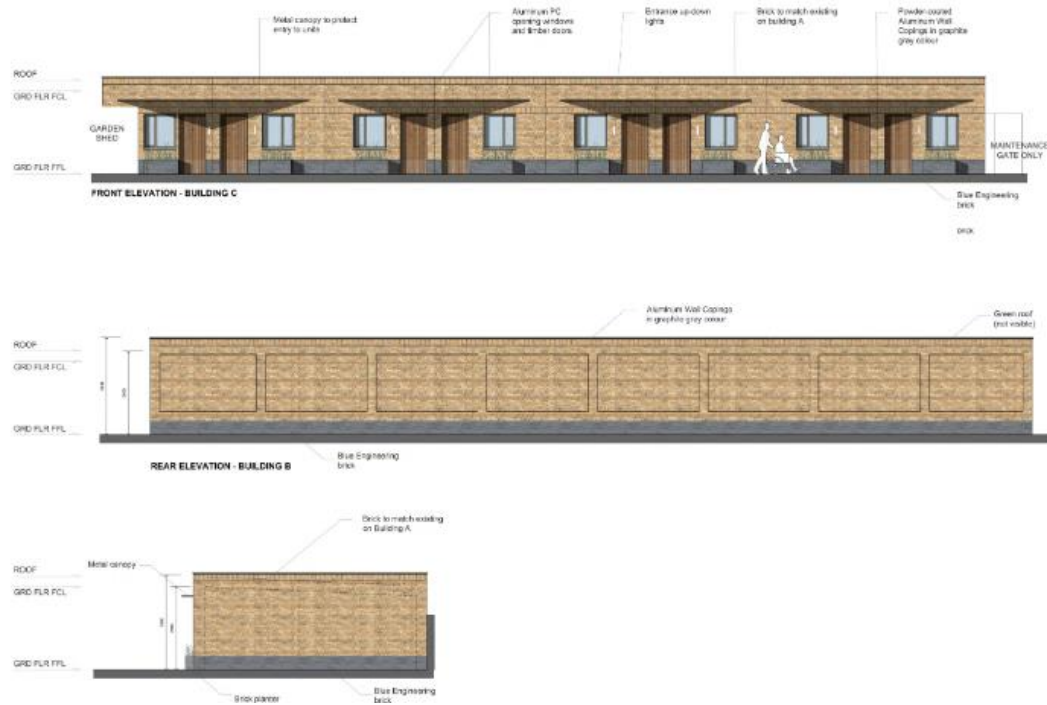
6.6.2 There is very little uniformity to the appearance of the buildings along this side of the High Road and therefore there is no particular sensitivity to the character of the street scene. However, the proposal still needs to provide high quality design which makes a positive contribution to the local character and distinctiveness of the area. The proposed roof extension has been amended in response to the council's previous pre-application advice by including lightweight appearance structure to the existing flat roof.

6.6.3 The overall massing and bulk of the scheme have been reduced in size. It is considered that the proposed design would be a subservient addition to the building that would not compete or dominate with its appearance, including from longer views. Furthermore, it is considered that the proposal would improve the current appearance of the roof level. The lightweight appearance would have a modern appearance that would be a positive addition to the building which helps its sensitive design.

Single storey rear buildings

6.6.4 The layout and positions of the proposed two ground floor buildings (mainly Buildings B and C) are considered modest in size and acceptable. The single storey design and appearance would fit in comfortably within the rear context.

Fig 5 Building A



Materiality

- 6.6.5 The material palette has been carefully selected to harmonise with the surrounding context and reflect the character of the area. The façade's primary feature red brickwork would be complemented by stone cladding. The windows will be reinstated at their original size and replaced with slim line, double glazed timber framed windows. The extension on the roof is proposed with a vertical stand and zinc cladding in natural colour. All external materials will be confirmed via condition; the proposed approach is considered appropriate and would be visually appealing.

Design Summary

- 6.6.6 Given the above and the support from the QRP, the proposed development in design and appearance terms is considered acceptable.

6.7 Residential Accommodation Quality

General Layout

- 6.7.1 The Nationally Described Space Standards set out the minimum space requirements for new housing. The London Plan 2021 standards are consistent with these. London Plan Policy D6 requires housing developments to be of high-

quality design, providing comfortable and functional layouts, benefiting from sufficient daylight and sunlight, maximising the provision of dual aspect units and providing adequate and easily accessible outdoor amenity space. It provides qualitative design aspects that should be addressed in housing developments.

- 6.7.2 The Mayor of London's Housing SPG seeks to ensure that the layout and design of residential and mixed-use development should ensure a coherent, legible, inclusive and secure environment is achieved. Policy DM1 requires developments to provide a high standard of amenity for its occupiers.

Fig 6 Typical unit layout



Example of standard unit proposed for Excel House

Joy Foundation / Prince Regent Lane, London E13 8RP



- 6.7.3 There are no specific quantitative residential standards for this type of facility from a planning perspective. It is important to note that this facility does not comprise of conventional housing and therefore it is not required to meet the London Plan and London Housing SPG standards applicable to conventional dwellings. However, some consideration has been given to guidance provided by various charities as such Shelter "*Accommodation standards and costs for homelessness accommodation*" as a benchmark criterion for short-term accommodation.

- 6.7.4 This being acknowledged, the proposal would provide 52 individual private self-contained rooms, across the ground, first, second and third floors of the building.

In terms of gross internal area, all the rooms sizes ranges from 14sqm to 27sqm. The proposed internal space would exceed London Plan space standards for single person occupancy (all bedrooms would have a gross internal area of more than 7.5sqm) and actually also exceed minimum floorspace standards for double bedrooms (floorspace of at least 11.5 sqm); and is considered to have additional sufficient space for a wc/washbasin/shower and a kitchenette. The submitted plans show that there would be windows present on all sides of the building (front, rear and two flanks) at all levels, and all the occupants of the proposed facility would benefit from sufficient natural light and outlook.

- 6.7.5 Due regards have also been given to Setting the Standard 2 (StS2) dated 2013 – Version 11. This is a pan-London scheme for setting and assessing standards in accommodation used by London Boroughs for the temporary placement of priority homeless persons pending a permanent housing solution. All the proposed partially self-contained units will benefit from an en-suite wc, washbasin, a shower and also have a kitchenette for the preparation of simple meals and snacks. The standard requires that consideration is given to the shape of the room, and single rooms should have a minimum width of 1.8 metres. The proposed rooms exceed this standard.
- 6.7.6 The application was accompanied by an internal daylight and sunlight report which indicates that all rooms will be well lit for their intended use. A study was undertaken using 3D modelling. The report indicates that in relation to average daylight factor (ADF), all the 52 bedrooms tested would exceed their target values for their room use. The amenity area proposed to the rear of the site is surrounded by single storey High Cross Church to the south and adjoins residential rear gardens to the east along Saltram Close. The proposed amenity space to the rear would receive adequate. All habitable rooms would also receive adequate sunlight. Proposal will benefit from daylight and sunlight level in excess of the BRE guidance. The proposed development is acceptable for planning, in daylight and sunlight terms.
- 6.7.7 Whilst it is acknowledged that all the proposed bedrooms are single aspect, it is noted that there are no single aspect north facing bedrooms and south facing bedrooms windows would be provided with brise soleil to minimise overheating. All bedrooms would have appropriate access to daylight and meet the required values and in this instance, it is acceptable given the short-term occupancy nature of the proposed accommodation.
- 6.7.8 All bedrooms would have a minimum floor to ceiling height of 2.5metres which exceeds standard, with a lift serving each of the floors. All rooms would be well laid out to provide useable living spaces and sufficient internal storage space. The units will each have a wardrobe, kitchenette, table, chair, bed, bed-side table, drawer unit and en-suite. There will be a washer and dryer on site and the en-suite can be further used for drying clothes if necessary. All rooms are considered acceptable in this regard.

- 6.7.9 The application was accompanied by a Management Plan which outlines security methods of operation that will be implemented within the proposed accommodation. The management plan would be secured by condition. The general arrangements around the screening and selection process that will be undertaken prior to offering a room to a new resident are also outlined within the management plan; and would be worked up and secured within the S106.
- 6.7.10 In general terms, the standard of accommodation is of exceptional higher quality layout and standard, having been through a rigorous process including assessment by the Quality Review Panel.

Accessible Housing

- 6.7.11 London Plan Policy D7 seeks to provide suitable housing and genuine choice for London's diverse population, including people with disabilities and older people. To achieve this, policy requires that 10% of new housing is wheelchair accessible and that the remaining 90% is easily adaptable. Local Plan Policy SP2 is consistent with this, as is Policy DM2 of the DM DPD which requires new developments to be designed so that they can be used safely, easily and with dignity by all.
- 6.7.12 All ground floor units/rooms (i.e. 15 rooms in total located on the ground level), are wheelchair accessible and are fully compliant with Part M4[3] Wheelchair User Dwellings in addition to the National Space Standards. This exceeds the 10% policy target. The remaining 90% of rooms will comply with M4(2) and be accessible/adaptable.
- 6.7.13 The proposed building provides step free access throughout and would incorporate a passenger lift for residents. Two dedicated off-street blue badge bays within the development to the rear will be secured via legal agreement. This will be discussed further in the transport and parking section of the report.

Amenity Space provision

- 6.7.14 A large communal room and residents lounge will be provided on the ground and upper floors. The ground floor also provides a meeting room designated for private meetings between residents of the emergency accommodation and their support workers. The rear part of the site which is intended to be left open will be converted to a high-quality courtyard area with landscaping and sitting places. This space will allow residents to relax and interact with other residents and staff. Details of the proposed landscaping for the courtyard area have been submitted with the application. The proposal includes tree planting within the courtyard. Permeable paving is proposed to run through the central part of the courtyard to allow direct access to this space from the resident's lounge and the entrance to the courtyard from the opposite side which allows access from the rear part of the building.

- 6.7.15 Overall officers are satisfied that the facility will provide an appropriate standard of accommodation for temporarily homeless individuals, including for wheelchair users, and that it will provide a safe place to stay for people who find themselves in need of support.

6.8 Impact on Neighbouring Amenity

- 6.8.1 London Plan Policy D6 requires that design must not be detrimental to the amenity of surrounding housing, specifically stating that proposals should provide sufficient daylight and sunlight to surrounding housing that is appropriate for its context, while also minimising overshadowing. London Plan Policy D14 requires development proposals to reduce, manage and mitigate noise impacts.
- 6.8.2 Policy DM1 'Delivering High Quality Design' of the DM DPD states that development proposals must ensure a high standard of privacy and amenity for neighbours. Specifically, proposals are required to provide appropriate sunlight, daylight and aspects to adjacent buildings and land, and to provide an appropriate amount of privacy to neighbouring properties to avoid overlooking and loss of privacy and detriment to amenity of neighbouring residents.

Daylight and Sunlight Impact

- 6.8.3 The applicant has submitted a Daylight and Sunlight analysis in support of the scheme including appendices highlighting the windows assessed, which provide a detailed examination using accurate modelling of the impact of the proposal on the rear gardens of properties on Saltram Close, which backs on to the application site. It concludes that all habitable windows of the neighbouring properties would pass the daylight and sunlight analysis tests. The assessment concludes that the windows would have before/after ratios which exceed the BRE guidance target of 0.8 and is considered not to result in an unacceptable level of harm, particularly given the large separation distance between the buildings.
- 6.8.4 By reason of the proposed building's location, orientation and distance in relation to neighbouring amenity areas, it is anticipated that the proposal will not result in a detrimental level of increase in overshadowing to private garden areas of existing residential properties. Overall, the proposal would not have a material adverse impact on daylight and sunlight to residents of neighbouring properties at Saltram Close.

Privacy/Overlooking and outlook

- 6.8.5 As the rear of the proposed building would back onto the rear gardens of the properties on Saltram Close, the proposed development has been carefully designed to mitigate overlooking and potential loss of privacy to the rear gardens by limiting the number of windows to habitable rooms in this elevation. The

separation distances of 30m between the rear of the host building and the dwelling houses to the east (Saltram Close) is sufficient to ensure no harmful impact upon overlooking or outlook afforded to such nearby residences.

- 6.8.6 It is noted that massing potential of the development along the eastern boundary of the site is somewhat limited given the proximity of the adjacent rear gardens of the properties on Saltram Close with window/patio doors facing towards the application site. As such, the proposal (buildings B and C) has been designed to be only single storey alongside the eastern side boundary with windows facing inwards to the proposed central courtyard to avoid privacy conflicts and to mitigate the loss of light and outlook.
- 6.8.7 Therefore, it is considered that residents of nearby residential properties would not have any significant harm from the proposal in terms of loss of outlook or privacy.

Noise/Disturbance

- 6.8.8 Any noise emanating from the site will be restricted to that associated with use of the rear amenity courtyard area and external access walkways, comings and goings from the building, and servicing.
- 6.8.9 Notwithstanding, there is the potential the vulnerable nature of some persons living at the proposed emergency accommodation that the facility may generate or attract some disturbances or antisocial behaviour which could affect the surroundings. Whilst the design of the facility and access routes would mitigate some of the potential impacts as such, it is also important that a management plan be implemented detailing the nature of operation of the facility, how it is to be managed including in respect of potential conflicts and difficult people, and including mechanisms for surrounding residents to report to staff any issues that need to be addressed. A management plan was submitted with the application outlining proposed security methods of operation that will be implemented within the proposed accommodation. Details of screening and selection process that will be taking place prior to offering a unit to a new person are also outlined within the management plan. Whilst the submitted management plan provides an outline of proposed means of making a complaint for surrounding residents, it would also be beneficial to make available to residents, information on complaints procedures and how complaints will be dealt with so as to afford greater certainty to residents that issues will be adequately dealt with and to demonstrate accountability and greater transparency in respect of such matters. To this end, whilst the procedural information submitted offers a degree of satisfaction to Officers as to the ability of the facility to effectively manage and resolve issues onsite a condition is considered appropriate requiring a more detailed management plan for submission, approval and subsequent implementation prior to occupation.

Construction phase of the development

- 6.8.10 It is inevitable that the construction phase of the development would cause some detriment to neighbouring amenity. Officers consider that any such impacts however can be suitably mitigated via implementation of a Demolition and Construction Logistics Plan which shall cover matters which are likely to cause nuisance to adjoining occupiers, accompanied by mitigation measures addressing all matters relevant to this particular site. A condition to secure the submission, approval and subsequent implementation of such a plan is therefore recommended.
- 6.8.11 Subject to the imposition of, and adherence to, the recommended conditions, Officers are satisfied there would be no unacceptable harm to neighbouring residents' amenity.

6.9 Parking and Highways

- 6.9.1 Local Plan 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. This approach is continued in Policies DM31 and DM32 of the DM DPD.
- 6.9.2 London Plan Policy T1 sets out the mayor's strategic target for 80% of all trips in London to be made by foot, cycle or public transport by 2041. This policy also promotes development that makes the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport. Policy T6 sets out cycle parking requirements for developments, including minimum standards. Policy T7 concerns car parking and sets out that 'car-free' development should be the starting point for all development proposals in places that are well-connected by public transport. Policy T6.1 sets out requirements for residential car parking spaces.
- 6.9.3 The site has a public transport accessibility level (PTAL) rating of 6B, which is considered to have excellent access to public transport services. The nearest station to the site is Seven Sisters Station which is a 7-minute walk to the site. South Tottenham and Tottenham Hale Stations are 12-minutes' walk away. Future residents would be well connected to local bus services as the site is served by 12 bus services within 2 minutes' walk of the site. Additionally, bus stops are adjacent to the site. The site is located within the Seven Sisters Controlled Parking Zone which restricts parking to permit holders Monday to Saturday between 08:00 – 18:30.

Trip generation

- 6.9.4 The trip generation analysis for the proposed development was undertaken using TRICS database, which is welcomed by Transport for London. For the existing F1 use class TRICS predicts 17 vehicle arrivals/departures in the AM peak hour and 22 in the PM peak. For the (emergency/short term 1 bed units proposed) a lower

vehicle a trip generation of 5 vehicle arrivals/departures in the AM peak hour and 6 in the PM peak are expected. With the blue badge only parking available it is likely to be lower than this in practice. Overall, it is expected that there will be a reduction in vehicle trips to and from the site given the change of use, and essentially car free residential development. The likely number of person and vehicle trips should not create any network capacity or congestion issues.

Car parking considerations

- 6.8.5 The proposed scheme would be a car free development, with the exception of blue badge car parking. Given the location within a CPZ, and with the PTAL of 6B, the proposal would meet the criteria of Policy DM32 for a car free/permit free development. There are 2 off-street blue badge parking bays currently proposed. This would be dedicated to residents who need them, secured by condition.
- 6.8.6 The development is proposed as car free and given the nature of the development and its location, this would be appropriate. Residential/Business Permit free status should be implemented by way of a planning obligation.

Blue badge (accessible) provision

- 6.8.7 Two off street spaces (which will also have electric vehicle charging facilities) are proposed. It is not clear how many fully accessible/wheelchair rooms there will be. The provision is effectively determined by the space available with the configuration of the development as proposed. The 2011 census recorded average car ownership at 0.44 vehicles per household. This is expected to have reduced since then, and given the nature of the development, it is expected car ownership will be very low.

Cycle parking

- 6.8.8 The London Plan numerical requirements for the C2 land use are for the provision of a long stay space for each 5 staff and one for every 20 bedrooms. The requirement for short stay cycle parking is for one space per 50 bedrooms. It has now been confirmed that 2 staff will work at the development and further 2 staff at the cafe. Therefore, the London Plan numerical requirements will be for 2 staff space and 3 for residents, plus 2 visitor spaces for the 52 bedrooms. Therefore, the provision of 8 spaces in total will exceed London Plan numerical requirements.
- 6.8.9 The design and arrangement of all cycle parking will need to meet the requirements of TfL's London Cycle Design Standards.
- 6.8.10 As such, the cycle parking is acceptable subject to the imposition of a condition to secure details and implementation.

Waste and recycling arrangements

- 6.8.11 The bin store is proposed to be at ground floor level, adjacent to the southern boundary. The applicant will need to ensure storage and collection arrangements meet the standards of Haringey's Waste team. The Council's waste management officer has been consulted on the proposals and has advised that they are acceptable subject to all waste streams should be included in the bin store. Officers therefore recommend that all waste streams are secured by a condition.

Construction Phase and arrangement

- 6.8.12 An outline construction logistics plan has been submitted and reviewed by the Council's Transportation Team. The applicant will need to liaise and discuss intended means of access and servicing the site from the highway with Transport for London (TfL) Network Management Officers, and the outcomes of these conversations will need to inform the finished Construction Logistics Plan.
- 6.8.13 The Construction Logistics Plan (CLP) can be updated prior to commencement of development to reflect the outcomes and requirements of discussions with TfL, and this will be covered within a pre-commencement condition.
- 6.8.14 Overall it is considered that the application is acceptable in transport and parking terms, and in terms of its impact on the public highway.

6.9 Sustainability, Energy and Climate Change

- 6.9.1 The NPPF requires development to contribute to the transition to a low carbon future, reduce energy consumption and contribute to and conserve the natural environment.
- 6.9.2 London Plan Policy SI 2 (Minimising greenhouse gas emissions) states that major developments should be zero carbon, and in meeting the zero-carbon target, a minimum on-site reduction of at least 35% beyond Building Regulations is expected. Local Plan Policy SP4 requires all new developments to introduce measures that reduce energy use and carbon emissions. Residential development is required to achieve a reduction in CO2 emissions. Local Plan Policy SP11 requires all development to adopt sustainable design and construction techniques to minimise impacts on climate change and natural resources.
- 6.9.3 Policy DM1 of the DM DPD states that the Council will support design-led proposals that incorporate sustainable design and construction principles and Policy DM21 expects new development to consider and implement sustainable design, layout and construction techniques.
- 6.9.4 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.

- 6.9.5 The proposed development has sought to adopt a progressive approach in relation to sustainability and energy to ensure that the most viable and effective solution is delivered to reduce carbon emissions.

Carbon Reduction

- 6.9.6 Policy SP4 of the Local Plan Strategic Policies, requires all new development to be zero carbon. The London Plan 2021 further confirms this in Policy SI2.
- 6.9.7 The applicant has submitted an Energy and Sustainability Statement in support of this application. Photovoltaic panels would be provided on building roofs, and the development would be heated with efficiency heating systems.
- 6.9.8 The development would achieve a reduction of 70% carbon dioxide emissions on site which is supported in principle. LBH Carbon Management officers raise no objections to the proposal, subject to some clarifications with regards to the submitted energy strategy which would be covered by condition.
- 6.9.9 The development would achieve a saving of 3.7 tCO₂ in carbon emissions (18%) under Be Lean. This exceeds the minimum 10% and 15% reduction set respectively for residential and non-residential developments in London Plan Policy SI2, this is supported by LBH Carbon Management.
- 6.9.10 In terms of the installation of various renewable technologies, the report concludes that solar photovoltaic (PV) panels are the most viable options to deliver the Be Green requirement. A total of 10.3 tCO₂ (51%) reduction of emissions are proposed under Be Green measures with 52 panels proposed on the main roof.
- 6.9.11 The shortfall will need to be offset to achieve zero-carbon, in line with Policy SP4 (1). The estimated carbon offset contribution is £17,385 plus a 10% monitoring fee, will be subject to change during the detailed design stage. This would be secured in the S106 legal agreement.

Overheating

- 6.9.12 The applicant has undertaken a dynamic thermal modelling assessment in line with CIBSE TM52 with TM59 weather files. Further mitigation measures are required in order for the bedroom to pass the overheating requirements for 2020s DSY1. In order to pass the mandatory weather files for the proposed residential dwellings the following measures will be built:
- Openable windows, but with some openable windows restricted
 - Glazing g-value of 0.53
 - Proposed external shading (proposed unclear)
 - MVHR with cooling bolt on

6.9.13 In order to pass the mandatory requirements a revised strategy is required with the applicant needing to confirm if the modelling has been prepared using:

- a). Central London weather file, which will more accurately represent the urban heat island effect.
- b). Type 1 occupancy (see CIBSE TM52) as the development includes vulnerable residents.

6.9.14 The applicant has agreed to undertake further modelling and submit a revised overheating report showing compliance with relevant CIBSE TM52 and TM59 using the CIBSE TM49 London Weather Centre files for the DSY1-3 (2020s) and DSY1 2050s. The applicant should demonstrate how the Cooling Hierarchy has been followed, and the risk of overheating has been reduced as far as practical by prioritising all passive measures, such as reduced glazing and increased external shading, before the incorporation of active cooling. The proposed shading strategy is not fully clear. The proposed elevations have indicated the provision of brise-soleils; however, it is unclear if they have been modelled in the overheating assessment. The Carbon Officer is satisfied this can be adequately addressed at a later stage, and as such this matter can be secured by the imposition of a condition.

6.10 Urban Greening, Biodiversity Net Gain, Trees and Ecology

Urban Greening Factor

6.10.1 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. This should include tree planting, shrubs, hedges, living roofs, and urban food growing. Specifically, living roofs and walls are encouraged in the London Plan. Amongst other benefits, these will increase biodiversity and reduce surface water runoff

6.10.2 An assessment of the Urban Greening Factor (UGF) has been provided by the applicant based on the surface cover types. The proposed scheme includes landscaping, extensive green roof, green wall, planting, ground cover planting, and permeable paving.

6.10.3 The scheme would have an Urban Greening Factor of 0.4 which meets the minimum target set out in the London Plan as the proposed development. It is considered that the proposed development in terms of urban greening is

acceptable. Details of landscaping and living roofs and walls would be secured by the imposition of a condition to secure a high-quality scheme.

Biodiversity

6.10.4 Biodiversity Net Gain (BNG) is an approach to development which makes sure that habitats for wildlife are left in a measurably better state than they were before the development. The Environment Act 2021 introduced a statutory requirement for most developments to deliver a BNG of 10%. This means a development will result in more or better-quality natural habitat than there was before development. If, however, the 10% BNG cannot be achieved within the site, the legislation allows the option to deliver a mixture of on-site and off-site biodiversity gain, through purchase of off-site biodiversity units on the market or directly from the Government.

6.10.5 London Plan Policy G6 seeks to manage impacts on biodiversity and aims to secure biodiversity net gain. Local Plan Policy SP11 promotes high quality landscaping on and off-site. Policy DM1 of the DM DPD requires proposals to demonstrate how landscape and planting are integrated into the development and expects development proposals to respond to trees on or close to a site. Policy DM21 of the DM DPD expects proposals to maximise opportunities to enhance biodiversity on-site.

6.10.6 The entire site is currently hard surfaced and does not comprise any biodiversity elements. The plans submitted with the application indicate improvements to proposed landscaping within the rear courtyard and installation of a green/sedum roof over the main building. The proposal includes planting of a number of species within the site. Officers consider that the proposed improvements to biodiversity would significantly increase the value of the site in this respect, noting the lack of any biodiversity elements on site at the moment. The submitted preliminary landscaping plan is reasonably detailed, and the proposal contains photographs of the proposed plants, hard surface materials and furniture. A condition is recommended to require a fully detailed landscaping plan in respect of finalised species and an aftercare programme for approval and hard surface materials, and subsequent implementation.

6.11 Air Quality and Land Contamination

Air Quality

6.11.1 Policy DM23 of the DM DPD requires all development to consider air quality and improve or mitigate the impact on air quality in the borough and users of the development. An Air Quality Assessment (AQA) was prepared to support the planning application and concluded that future occupants would experience

acceptable air quality with pollutant concentrations below the air quality objectives. It also highlighted that the air quality impacts from the proposed development during the demolition and construction phase would not be significant and that in air quality terms it would not conflict with national or local planning policies.

6.11.2 The proposed development is considered to be air quality neutral given the building and transport related emissions associated with the proposed development are both below the relevant benchmarks.

6.11.3 Demolition and construction works are temporary and can be mitigated through the requirements of the Air Quality and Dust Management Plan to include air quality control measures such as dust suppression. The Council's Lead Pollution Officer raises no objection to the proposal subject to the relevant condition being imposed in respect of management and control of dust. The proposal is not considered an air quality risk, nor would it cause potential harm to nearby residents, or future occupiers.

Land Contamination

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

6.11.5 Prior to reuse of the site a desktop study will need to be carried out and include the identification of previous uses, potential contaminants that might be expected, given those uses, and other relevant information.

6.11.6 As such, the Pollution Officer raises no objections to the proposal subject to the relevant conditions being imposed in respect of land contamination and unexpected contamination and an informative regarding asbestos should consent be granted.

6.12 Fire Safety

6.12.1 Policy D12 of the London Plan states that all development proposals must achieve the highest standards of fire safety. To this effect major development proposals must be supported by a fire statement. This application is not subject to Fire Safety Gateway 1 (the scheme heights would be below 7 storeys and the 18 metres threshold) and therefore the Health and Safety Executive (HSE) / Building Safety Regulator (BSR) is not required to be formally consulted.

6.12.2 The London Plan Policy D12(b) 'Fire Statement' checklist sets the criteria for assessing fire statements at planning application stage to ensure the policy requirements of Policy D12 are sufficiently addressed. The scheme meets the criteria as set out below.

1. The fire safety information has been provided within a fire statement prepared by Milan Babic dated 22/11/2024.
2. The applicant has made a declaration of compliance that the fire safety of the proposed development and the fire safety information satisfy the requirements of London Plan Policy D12A.
3. Information within the fire statement addresses Policy D12 A1-A6 of the London Plan.
4. The fire safety information is specific and relevant to the development proposal.
5. The author has made a declaration of compliance against London Plan Policy D5(B5) requirement for fire evacuation lifts.
6. The compliance declaration states that the applicant is satisfied the design and provision of lifts is compliant with the stated design code.

6.12.3 Officers are satisfied that the policy requirements have been sufficiently addressed, and the fire safety information is satisfactory under London Plan Policy D12(A). A formal detailed assessment will be undertaken for fire safety at the Building Control stage.

6.13 Flood Risk and drainage

6.13.1 Local Plan Policy SP5 and DPD Policy DM24 seek to ensure that new development reduces the risk of flooding and provides suitable measures for drainage.

6.13.2 The site is located outside any official flood risk zone. The proposed paving is indicated to be permeable and therefore would accord with the SUDs principle.

6.14 Conclusion

- The proposed development provides specialist accommodation for single homeless people for which there is an identified need.
- The proposed change of use and refurbishment of the building will improve the internal and external quality and appearance of the site which is currently in a poor state.
- The proposed facility will provide an appropriate standard of accommodation for temporary accommodation for homeless individuals including for wheelchair users.
- The impact of the development on nearby residential amenity is considered acceptable.
- The proposal complies with transportation policy and caters for alternative modes of transport.
- The proposed development would be a high-quality design, of an appropriate scale in the existing urban context and would respect the visual amenity of the streetscape and locality.
- The proposed development would enhance and preserve the character of the conservation area including the significance of the nearby listed buildings.

- The development would achieve a reduction of 70% carbon dioxide emissions over Building Regulations Part L 2021 and provide appropriate carbon reduction measures plus a carbon off-setting payment.
- The applicant will continue to work with Metropolitan Police Designing Out Crime officers to ensure that the premises are appropriately safe and secure.
- The proposed development will secure several obligations including Local Housing Allowance (LHA) rates and first refusal option to mitigate the residual impacts of the development.

7.0 COMMUNITY INFRASTRUCTURE LEVY

Based on the information given on the plans, the Mayoral CIL charge will be £32,701.04 (460 sqm x £71.09) and the Haringey CIL charge will be £27,089.04 (460sqm x £58.89). These rates are based on the Annual CIL Rate Summary for 2025. This will be collected by Haringey after/should the scheme is/be implemented and could be subject to surcharges for failure to assume liability, for failure to submit a commencement notice and/or for late payment, and subject to indexation in line with the RICS CIL Index. An informative will be attached advising the applicant of this charge

8.0 RECOMMENDATIONS

GRANT PERMISSION subject to conditions in Appendix 1 and subject to a section 106 Legal Agreement.