

REPORT FOR CONSIDERATION AT PLANNING SUB-COMMITTEE

1. APPLICATION DETAILS

Reference Nos:

- 1) HGY/2015/2915
- 2) HGY/2016/0990

Ward: Tottenham Green

Addresses:

- 1) Apex House 820 Seven Sisters Road N15 5PQ (HGY/2015/2915)
- 2) Wards Corner Site High Road London N15 (HGY/2016/0990 & Deed of variation)

Proposals:

- 1) Demolition of existing building and construction of one 23 storey building with single basement, one 7 storey building and 4no. 3 storey townhouses comprising residential (private and affordable) use, with 875sqm of market (sui generis) or A2, A3, B1 flexible commercial floorspace at ground floor, servicing yard and associated landscaping.
- 2) Non-material amendment following a grant of planning permission HGY/2012/0915 for the installation of a new public art wind screen to Seven Sisters Road.

Applicant: Grainger Seven Sisters Ltd

Ownership: Council

Case Officer Contact: Robbie McNaugher

Site Visit Date: 06/04/2016

Date received: **Last amended date:** 06/04/2016

02/10/2015

05/04/2016

Drawing number of plans:

- 1) 1584-G100-P-SITE-001, 1584-G200-P-RF-001, XE-E-001, XE-N-001, XE-NW-001, XE-S-001, XE-SW-001, XE-W-001, P-DEM-001, P-00-001 rev. C, P-MZ-001, P-01-001 rev. C, P-02-001 rev. C, P-03-001 rev. C, P-04-001 rev. C, P-05-

001 rev. C, P-06-001 rev. C, P-07-001 rev. C, P-09-001 rev. C, P-18-001 rev. C, P-20-001 rev. C, P-22-001 rev. B, P-B1-001, P-RF-001 rev. C, P-D-00-001 rev. C, P-D-MZ-001, P-D-01-001 rev. C, P-D-02-001 rev. C, P-D-03-001 rev. C, P-D-04-001 rev. C, P-D-05-001 rev. C, P-D-07-001 rev. C, P-D-09-001 rev. C, P-D-18-001 rev. C, P-D-20-001 rev. C, P-D-22-001 rev. C, P-D-B1-001, P-D-00-002 rev. B, P-D-01-002 rev. B, P-D-02-002 rev. B, P-D-03-002 rev. B, P-D-05-002 rev. B, E-E-001, E-N-001 rev. B, E-NW-001 rev. C, E-S-001, E-SW-001, S-AA-BB-001, S-CC-001, S-DD-001 rev. B, S-EE-001, S-FF-001, S-GG-001, S-HH-001, S-JJ-001, S-KK-001, S-LL-001, DET-001, DET-002, DET-003

2) P(00)01_E(1), P(00)01_F, P(00)21B, P(00)22_-, P(00)100_D and P(00)100_E

1.1 These applications have been brought to committee because the first is major development which is subject to referral to the Mayor for London and the Council is the landowner, and the 2nd is a variation to a major application.

1.2 SUMMARY OF KEY REASONS FOR RECOMMENDATIONS

HGY/2015/2915

- The principle of a landmark tall building is supported by existing and draft policy subject to detailed consideration, in particular the impact on the historic environment, the environmental conditions in the area and other surrounding heritage assets.
- The scale of development will provide a significant number of new homes that will help to meet the Borough and London's wider housing needs in the future. The PRS element will provide greater high quality purpose designed new homes with stable management and security for occupants complementing the existing housing offer in the area. The employment opportunities are considered to support the objectives within the Corporate Plan and Local Plan and will have a positive economic impact in the locality and planning obligation will secure opportunities for local unemployed people to maximise the regeneration benefits of the proposal
- The less than substantial harm caused by the proposals to the nearby heritage assets is outweighed by the townscape benefits of the proposal. The visual and townscape assessments accompanying the application demonstrate that the scale of development proposed within the application will have a significant impact on the appearance of the area locally but in the round will have a positive impact by enhancing the legibility of the area, removing a negative impact on the conservation area and improving the public realm. The design is considered to

be high quality which justifies a higher density than recommended in the London Plan guidance.

- There would be 39% affordable units based on habitable rooms which an independent viability assessment has shown to be maximum level of affordable housing that the site can viably support.
- The proposed mix of units is considered appropriate for a high density scheme at an accessible location with a larger number of smaller units but also some larger family units. The units within the tower would be 'tenure blind' and share communal areas. The proposed residential accommodation would be high quality and meet all the required London Plan Standards and exceed the requirements for child playspace. All the dwellings will meet the Lifetime Homes standards; and all will be easily adaptable for wheelchair users and 10% will be fully wheelchair accessible.
- The development is in a highly accessible area where car-free development is acceptable. On-street disabled car parking spaces are acceptable given they are within a reasonable walking distances. S106 obligations and conditions will secure a Controlled Parking Zone, Delivery and Servicing Plan, Waste Management Plan, cycle parking, parking management plan, construction management plan and necessary highways works through a S278 agreement. The proposal will have a high level of cycle parking and improve the pedestrian environment through the public realm works proposed. The servicing and delivery arrangements are acceptable.
- Having regard to the Environmental Statement submitted with the application, the environmental impacts of the development, including impact upon local amenity in terms of daylight, sunlight, noise, air quality and traffic impacts have been assessed and subject to the conditions proposed within the recommendation are considered to be acceptable. The impact of the tower on wind conditions/microclimate is also capable of being acceptably mitigated by the measures incorporated within the design of the development and the measure proposed for the Wards Corner site.
- The proposed tree removed is considered to be acceptable given the merits of the development and 5 replacement trees will be secured by condition. Conditions will also ensure that the trees to be retained are adequately protected to maintain the landscape character of the area.

- The level of carbon reduction proposed is considered acceptable in this instance and carbon offsetting is required through the S106 to reach the London Plan target. The development could connect to the Upper Lee Valley heat network and safeguarding will be secured by a condition. The building has been designed such that demand for cooling will be minimised. The proposal will provide sustainable drainage and will not increase flood risk and is considered to be a sustainable design.
- The waste management arrangements are considered acceptable and will be controlled through a S106 obligation. Conditions will be imposed to ensure that contaminated land risks are adequately mitigated and that there is no significant impact on air quality, the noise impacts of the proposal are considered acceptable. The proposal will make a positive contribution to the enhancement and protection of biodiversity.
- The proposals are not considered to give rise to any adverse equalities impact upon the protected characteristics of any individual or group.

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- Due to the design, scale and location of the proposed wind screen it would not have material impact on the previously approved development or change the impact of the resultant building upon the character and appearance of the conservation area. It is therefore considered acceptable as a non-material amendment.

2. RECOMMENDATION

HGY/2015/2915

- 2.1 That the Committee resolve to GRANT the application, taking account of the information set out in the Environmental Impact assessment, and that the Head of Development Management is delegated authority to issue the planning permission subject to the conditions and informatives set out in the Appendices of this report, subject to the prior completion of a Section 106 Legal Agreement to secure the obligations set out in the Heads of Terms below and subject to referral to the Mayor for London.
- 2.2 That the section 106 legal agreement referred to in resolution (2.1) above is to be completed no later than 09/07/2016 or within such extended time as the Head of Development Management or Assistant Director – Planning shall allow; and
- 2.3 That, following completion of the agreement(s) referred to in resolution (2.1) within the time period provided for in resolution (2.2) above, planning permission

be granted in accordance with the Planning Application subject to the attachment of the conditions.

Conditions

- 1) Development begun no later than three years from date of decision
- 2) In accordance with approved plans
- 3) Materials submitted for approval
- 4) Detailed sectional drawings for all elevations/materials
- 5) Landscape details and implementation
- 6) Arboricultural impact assessment
- 7) Accessible dwellings (lifetime homes)
- 8) Wheelchair accessible
- 9) Secured by design
- 10) Piling impact method statement
- 11) Contamination 1
- 12) Contamination 2
- 13) Boilers
- 14) CHP emissions
- 15) Air Quality and Dust Management Plan
- 16) Considerate Constructors
- 17) Machinery emissions
- 18) Machinery emissions 2
- 19) Demolition Logistics Plan
- 20) Construction Logistics Plan
- 21) Cycle parking
- 22) BREEAM/London Plan compliance
- 23) District energy safeguarding
- 24) Energy statement compliance
- 25) Drainage maintenance and management
- 26) Drainage compliance
- 27) Highways works
- 28) Provision of waste storage
- 29) Tree replacement
- 30) Plant noise
- 31) Biodiversity mitigation
- 32) Architect retention
- 33) Shutter and signage strategy
- 34) Communal aerial
- 35) Building lighting
- 36) Open space management plan

Informatives

- 1) Co-operation
- 2) CIL liable

- 3) Hours of construction
- 4) Party Wall Act
- 5) Street Numbering
- 6) Sprinklers
- 7) Surface water drainage
- 8) Water pressure
- 9) Asbestos survey

Section 106 Heads of Terms:

- 1) Affordable housing 39% affordable rent
- 2) Provision of PRS for minimum of 10 years
- 3) PRS Marketing and management strategies
- 4) Local labour and training during construction
- 5) Transport –
 - a. Car free -
 - b. £1000 towards the amendment of the Traffic Management Order
 - c. Car club provision
 - d. Two years free membership to a local Car Club and £50 driving credit
 - e. Travel Plan
 - f. £3,000 for travel plan monitoring
 - g. £23,000 towards the design and consultation for implementing a Control Parking Zone (CPZ) consultation
 - h. Delivery and Servicing Plan and Waste Management Plan
 - i. Parking Management Plan (PMP) including provision of up to 16 disabled parking spaces on Stonebridge Road
- 6) CO2 offsetting - £41,400 – 15 tonnes x £1,800
- 7) entering into a section 278 agreements for Highways and Public Realm works

2.4 That, in the absence of the agreement referred to in resolution (2.1) above being completed within the time period provided for in resolution (2.2) above, the planning permission be refused for the following reasons:

- i. The proposed development in the absence of a legal agreement securing the provision of on-site affordable housing would have a detrimental impact on the provision of much required affordable housing stock within the Borough and would set an undesirable precedent for future similar planning applications. As such, the proposal is contrary to policy SP2 'Housing' of the Council's Local Plan March 2013 and Policy 3.12 (Negotiating Affordable Housing on Individual Private Residential and Mixed Use Schemes) of the London Plan.
- ii. In the absence of an agreement to work with the Haringey Employment Delivery Partnership the proposal would fail to support local employment, regeneration and address local unemployment by facilitating training opportunities for the local population contrary to Local Plan Policies SP8 and SP9.

- iii. In the absence of planning obligations to secure a car free development, mitigation measures to promote sustainable transport, service and delivery plans, and a parking management plan the proposed development by reason of its lack of any off street parking provision will significantly exacerbate pressure on on-street parking spaces in surrounding streets, prejudicing the free flow of traffic and conditions of general safety along the neighbouring highway and would be detrimental to the amenities of local residents. As such the proposal is considered contrary to the requirements of Policy 6.13 of the London Plan 2015, Saved Policies UD3, HSG11 and M10 of the Haringey Unitary Development Plan 2006.
- iv. In the absence of the provision of a financial contribution towards carbon offsetting the proposal would result in an unacceptable level of carbon dioxide emissions. As such, the proposal would be contrary to London Plan Policy 5.2. and Local Plan Policy SP4.

- 2.5 In the event that the Planning Application is refused for the reasons set out in resolution (2.5) above, the Head of Development Management (or Assistant Director – Planning 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 Assistant 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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Grant a non-material amendment to planning permission HGY/2012/0915

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

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3.0 PROPOSED DEVELOPMENT AND LOCATION DETAILS

3.1 Proposed development

- 3.1.1 This is an application for the demolition of the existing council office building and construction of a mixed used residential and commercial development. The residential development would consist of a 23 storey tower with basement, a 7 storey building and 4 no. 3 storey townhouses with a total of 163 residential units. The building has been designed to provide units for private rent (PRS). A total of 104 units would be private and 59 for affordable rent. There would be a small commercial unit at the ground floor of the tower and 875sqm of market (sui generis) or A2, A3, B1 flexible commercial floorspace proposed on the ground floor of the 7 storey building. The development would be laid out around a courtyard accessed from Seven Sisters Road with other residential and commercial accesses directly onto Seven Sisters Road, The High Road and Stonebridge Road.
- 3.1.2 The tower would front onto Tottenham High Road and would accommodate 133 residential units for private rent and 29 affordable rent units with a ground floor residents' lounge and gym, commercial unit and cycle storage. It would be 23 storeys at its highest stepping down to 21, and 8 storeys at the rear and 20 storeys 18 storeys and 6 storeys to the flank. There would be outdoor amenity decks at 21st and 6th floor levels
- 3.1.3 The 7 storey building would face onto Seven Sisters Road and would accommodate 26 affordable rent units. There would be an outdoor amenity deck to the front at 5th floor level. On the ground floor and to the rear of this there would be 875sqm of market or flexible commercial floorspace. The use of the ground floor will depend on how the applicant discharges their S106 obligations pursuant to planning permission HGY/2012/0915 to accommodate the existing market at Wards Corner on a temporary or permanent basis. If the market is not accommodated on the ground floor then a potential mix of A2 (financial and professional), A3 (restaurants and cafes), B1 (business) will be accommodated. Above the market there would be deck level amenity area with children's play area at first floor level.
- 3.1.4 The 3 storey development would face onto Stonebridge Road and consist of 4 townhouses for affordable rent. These would have amenity decks at 3rd floor level at the front and yards to the rear. Also off Stonebridge Road there would be a servicing yard for the residential and commercial uses with bin storage and service vehicle access.
- 3.1.5 The residential accommodation would be a mix of 1, 2 and 3 bedroom flats as set out in the schedule below. The townhouses would be 4 bedrooms

	Number of bedrooms				Total
	1	2	3	4	
Private	48	36	20	0	104
Affordable	24	23	8	4	59

3.1.6 The development would be laid out around a landscaped courtyard which would be publically accessible but gated at night. There would be additional pavement areas provided on Seven Sisters Road and The High Road with landscaping. To manage the effect of wind around the building, mitigation measures are proposed in the form of a louvered screen between the tower and the 7 storey building and a glazed enclosure at street level.

3.1.7 The proposal does not include any on site parking space but does have storage for 265 bicycles in various locations on the ground floor. Disabled parking spaces would be leased from Homes for Haringey on Stonebridge Road as required.

Environmental Statement

3.1.8 The applicant submitted a scoping opinion (reference HGY/2015/1113) but not a screening opinion and the Council is satisfied that the submitted (EIA) covers all necessary matters. The physical form and impacts of the development have been assessed by way of an Environmental Impact Assessment.

3.2 Site and Surroundings

3.2.1 The site is located on the corner of Tottenham High Road and Seven Sisters Road. The site is also bounded to the south west by Stonebridge Road, and a pedestrian footpath linking Stonebridge Road to Tottenham High Road. The site is roughly triangular in shape and measures 0.39 Ha.

3.2.2 The site contains Apex House a three storey office building comprising 3,487 sqm of B1 office floorspace with associated car parking (33 spaces) to the rear of the site. The site is currently in use as a Council Office. The existing vehicular access and servicing to the site is provided via Stonebridge Road. At the front of the site is an area of pavement which includes a clock tower and public toilets and a line of mature trees along the High Road. To the rear and south is Seacole Court a three storey block of flats managed by Circle Housing Association.

3.2.3 The existing building falls outside of the Seven Sisters Conservation Area, however, the pavement to the front of the site, comprising the existing public toilets and clock tower, falls within the Conservation Area. To the east is the Page Green Conservation Area and to the South is the Seven Sisters Conservation Area. These are all part of the Tottenham High Road Historic Corridor. There are two locally listed buildings within the adjacent Wards Corner site and the Grade II listed former Barclay's Bank (220 to 224 High) Road lies to the north east.

3.2.4 Immediately to the north of the site is Seven Sisters Road and the Seven Sisters London Underground & Rail Stations with South Tottenham Station located to the southeast of the site. The site has the highest PTAL rating of 6B.

3.2.5 The site lies just outside West Green Road/Seven Sisters District Centre, which lies across Seven Sisters Road to the north. It is within the Upper Lee Valley Opportunity Area the Tottenham Housing Zone, the Tottenham High Road Corridor: and Seven Sisters Corridor Areas of Change.

3.2.6 The Local Plan sets out the future aspirations for Seven Sisters Corridor as follows:

- New housing and social infrastructure including, where appropriate and viable, the provision of new green space and community facilities;
- Ensuring that the Seven Sisters area and the tube and train station provides land marks/gateways to aid legibility through redevelopment and/or renewal;
- Comprehensive mixed use at St Ann's Hospital Site;
- Wards Corner regeneration delivering houses, shops and public realm improvements through redevelopment and/or renewal;
- Potential for future estate regeneration;
- NDC Legacy Spatial Framework and Neighbourhood Plan;
- Redeveloping Apex House as a strong district landmark building and gateway to Seven Sisters; and
- A decentralised energy hub serving surrounding schools and housing estates.

3.2.7 The application site and neighbouring Seacole Court has a site allocation (SS6) in the emerging Tottenham Area Action Plan DPD. The proposed allocation is for mixed use development with town centre uses at ground floor level and residential above. Consultation on the pre submission draft of the AAP closed on 4th March 2016.

3.3 Relevant Planning and Enforcement history

3.3.1 An EIA Scoping Opinion has been provided under the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 reference HGY/2015/1113

3.3.2 There is no other relevant planning history for this site

3.3.3 Planning permission and Conservation Area Consent have been granted (references HGY/2012/0915 and HGY/2012/0921) for the adjacent site at Wards Corner for the same applicant, on 12 July 2012 for: "*Demolition of existing*

buildings and erection of a mixed use development comprising class C3 residential, class A1/A2/A3/A4 uses, with access, parking and associated landscaping and public realm improvements". The proposal requires the accumulation of property which is not in the applicant's ownership. The Council's Cabinet granted resolution to use Compulsory Purchase Order (CPO) powers 10/11/15, the Order itself has yet to be made.

- 3.3.4 Planning permission has also been granted (reference HGY/2014/0575 on 22nd April 2014) for restoration of the existing market and corner building bringing 2150 m² of derelict space into A1, A2, A3 and B1 use, installation of bay windows to the front, dormer windows to the front and rear, reinstatement of chimneys, replacement of existing shop-fronts to the front of the market with new glazed facade, improvements to the public realm to the front of the market, new glazed rear doors added to the rear, new DDA compliant access to the first and second floor, reintroduction of internal light-wells from the first to ground floor and insulation of building to increase thermal efficiency.
- 3.3.5 This application is subject to a Planning Performance Agreement (PPA) and a number of pre-application meetings have been held.

4. CONSULTATION RESPONSE

4.1 Planning Committee Pre-application: pre-application briefing was held on the 10th March 2015

4.1.1 The notes of the meeting are set out in appendix 6.

4.2 Haringey Quality Review Panel has considered the proposal on 13th May and 19th August 2015.

4.2.1 The minutes of the meeting are set out in appendix 3 and summarised as follows:

4.2.2 *A significant number of strategic issues raised at the previous Quality Review Panel meeting to discuss this scheme remain to be addressed. Whilst progress has been made in terms of materials and construction, internal layout and wind analysis, the panel continues to have concerns about fundamental aspects of the scheme, including its scale and massing, microclimate, quality of residential and commercial accommodation, and landscape design. These issues will need to be addressed before the panel would support a planning application for this development. More detailed comments are provided below, and comments made at the previous review that remain relevant are repeated for clarity.*

4.3 Haringey Development Management Forum was held on 27th May 2015

- 4.3.1 The minutes of the meeting are set out in appendix 4 and summarised as follows:
- Queries around affordable housing

- Concerns with shadowing
- Concerns with height and design
- Concerns with the loss of community facilities
- Queries around local jobs and employment
- Support for investment and housing
- Queries around sustainability
- Concern with the impact on the London Underground
- Support for the investment if the design quality is ambitious

4.4 The following were consulted regarding the application:

Internal

- LBH Tottenham Team
- LBH Head Of Carbon Management
- LBH Housing Design & Major Projects
- LBH Arboriculturalist
- LBH Flood and Surface Water
- LBH Waste Management
- LBH Conservation Officer
- LBH Nature Conservation LBH Economic Development
- LBH Emergency Planning and Business Continuity
- LBH Environmental Health - Contaminated Land
- LBH Transportation

External

- London Fire Brigade
- Metropolitan Police Designing Out Crime Officer
- Transport For London
- London Underground
- Greater London Authority
- Thames Water
- The Victorian Society
- Historic England

Neighbouring Boroughs:

L. B. Waltham Forest

Local Groups:

- Tottenham Traders Association
- Haringey Federation of Residents Association

- Tottenham Civic Society
- Tottenham CAAC
- Tottenham Traders Partnership
- Wards Corner Community Coalition
- Page Green Residents Association

The responses are set out in full in Appendix One and are summarised as follows:

Internal:

1) Transportation

No objections subject to conditions and S106 obligations covering car free, delivery and servicing plan, waste management plan and parking management plan.

2) Waste management

No objection subject to a waste management plan to ensure waste is presented close to collection points, the provision of a cleansing schedule to remove litter from the external areas of the site and cleansing of the waste storage areas.

3) Environmental Health Pollution

No objection subject to conditions and an informative

4) Economic Development

No objections subject to S106 obligations to ensure local employment, apprenticeships and work placements. Appointment of an apprenticeship co-ordinator, education, training and work experience opportunities for local students. Local recruitment for commercial occupiers and compensation for loss of employment floor space.

5) Housing Commissioning, Investment and Sites team

The proposed mix and type of affordable housing will ensure a more sustainable, balanced and less transient community. 10% of all new residential developments across all tenures must be fully wheelchair accessible

6) Head Of Carbon Management

No objections subject to a contribution towards carbon reduction projects within Haringey through S106, demonstrating potential links to a district energy centre, delivery of the energy strategy and a dynamic thermal model is undertaken on all aspects of the development.

7) Conservation

The scheme is acceptable subject to conditions on materials including those proposed for the public realm and landscaping.

8) Tree & Nature Conservation Manager

No objections subject to a tree protection plan, arboricultural method statement and suitable replacement planting. T6 and T10) merit TPO's.

9) Flood and Surface Water

Agree in principle to the concept proposed and required conditions for further details.

External:

10) London Underground

Satisfied that these works will not have a significant impact on London Underground (LU) assets.

11) Transport For London

Initial concern with the proposed loading bay which has been addressed subject to size restrictions on vehicles otherwise no objections subject to provision of disabled parking and a construction management plan.

12) Designing Out Crime Officer

No objections subject to compliance with Secured by Design Sections 2 and 3.

13) Thames Water

No objections subject to a condition and informatives.

14) Historic England

Concern that the proposal causes a harmful contrast in scale and character between the established historic environment, and the proposed new construction. The application should be determined in accordance with national and local policy guidance, and on the basis of your specialist conservation advice.

15) GLA (Stage 1 response)

On balance, the application does not yet comply with the London Plan and further information should be provided with regard to housing, affordable housing, urban design, inclusive design transport and climate change to address these deficiencies.

Officer comment: The applicant has provided further information and GLA officers are satisfied that all issues have now been addressed.

5. LOCAL REPRESENTATIONS

5.1 The following were consulted:

1,128 Neighbouring properties (in 2 rounds of consultation)
8 Residents Associations/Civic/Amenity Groups
8 site notices were erected close to the site

5.2 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: 225
Objecting: 213
Supporting: 11
Others: 1

5.3 The following local groups/societies made representations:

- Tottenham CAAC
- Page Green Residents Association
- Haringey Housing Action Group

5.4 The issues raised in representations that are material to the determination of the application are set out in Appendix 1 and summarised as follows:

- Objections to the design and appearance
 - Inappropriate scale, height and massing
 - Impact on the skyline and townscape
 - Out of keeping with the area
 - Impact on the conservation area
- Concerns with the quality of the development
- Concerns in relation to the relocation of wards corner market
- Impact on neighbours and the surrounding area
 - Loss of privacy
 - Overshadowing and loss of light
 - Wind impacts
 - Health and psychological impacts of shadowing
 - Noise and disturbance during construction
- Additional views of the building should be provided
- Impact on local services and the community

- Transportation concerns,
 - increased parking
 - overcrowding on the underground and trains
- Concern with the affordable housing provision
- Concerns around regeneration and impact on the area
- Impact on underground services
- Loss of trees
- Inadequate consultation
- Support for the project and regeneration
- Support for the jobs provided

5.5 The following issues raised are not material planning considerations:

- Loss of a private view (Officer Comment: This is a private matter and therefore not a material planning consideration)
- Impact on property values (Officer Comment: (This is a private matter and therefore not a material planning consideration)
- Inadequate consultation. (Officer Comment: Consultation has been carried out by the applicant and the Council prior to the submission and the applicant has provided a statement of community involvement which responds to the points raised. The application has been consulted on in accordance with the Council's Statement of Community Involvement)

6 MATERIAL PLANNING CONSIDERATIONS

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

1. Principle of the development
2. Regeneration
3. Heritage
4. Design
5. Affordable housing, mix and quality
6. Transport
7. The impact on neighbouring amenity, Daylight/Sunlight Microclimate
8. Trees
9. Flooding and drainage
10. Energy/Sustainability
11. Waste storage
12. Contaminated land and air quality
13. Daylight/Sunlight
14. Microclimate
15. Noise
16. Ecology
17. EIA
18. Equalities

19. Conclusion

6.2 Principle of the development

The NPPF

- 6.2.1 The NPPF establishes overarching principles of the planning system, including the requirement of the system to “drive and support development” through the local development plan process and supports “approving development proposals that accord with the development plan without delay”. The NPPF also expresses a “presumption in favour of sustainable development which should be seen as a golden thread running through both plan-making and decision-taking.”
- 6.2.2 The NPPF has 12 core planning principles., These include clear statements about the importance of a plan led approach, and the need to plan creatively, and actively to promote growth whilst considering local characteristics, securing high quality design and amenities and supporting the move to a low carbon economy, whilst optimising land use and densities and conserving and respecting heritage interests.
- 6.2.3 The NPPF encourages the ‘effective use of land by reusing land that has been previously developed’. In respect of applications that include provision of housing, the NPPF highlights that delivery of housing is best achieved through larger scale development.
- 6.2.4 Paragraphs 126 to 141 meanwhile contain the heritage specific policies in the NPPF. The objective of these policies is to maintain and manage change to heritage assets in a way that sustains and, where appropriate, enhances its significance. That significance is the value of a heritage asset to this and future generations because of its heritage interest, which may be archaeological, architectural, artistic or historic. This significance may derive not only from its physical presence but also from its setting. These are dealt with in more detail in the Heritage section of this report.

The Development Plan

- 6.2.5 For the purposes of S38(6) of the Planning and Compulsory Purchase Act 2004 the Development Plan consists of the London Plan (2016), Haringey’s Local Plan Strategic Policies and the saved policies of Haringey’s Unitary Development Plan (2006). The Council has recently consulted at the pre-submission (reg 19) stage on alterations to its strategic polices document and a new suite of documents including the Tottenham Area Action Plan and Development Management Polices DPD. The consultation closed on 4th March 2016.

London Plan

6.2.6 The London Plan (2016) sets a number of objectives for development through various policies which are set out below:

- To promote and enable growth within London (Policies 2.7 and 4.1).
- To promote growth in Opportunity Areas (this site lies within the Lee Valley Opportunity Area)
- To recognise the importance of increasing housing supply and choice (Policy 3.3), optimising housing output (Policy 3.7) and include complementary non-residential uses within large residential developments (Policy 3.7).
- Creating mixed communities through meeting needs and fostering social diversity (Policies 3.1 and 3.9) and through providing affordable housing (Policy 3.10).
- Provide positive and practical support to sustain the contribution of the Private Rented Sector (PRS) in addressing housing needs and increasing housing delivery (Policy 3.8)
- Seeking to reinforce qualities of heritage assets in order to stimulate regeneration (Policy 7.9).
- To create lifetime neighbourhoods through designing to interface with surrounding land (Policy 7.1) and achieve high standards of accessible and inclusive design (Policy 7.2).
- To support high density development relative to accessibility and public transport capacity (Policy 6.1).

The policies in the London Plan are accompanied by a suite of SPGs that provide further guidance. The relevant SPG are set out below:

- a. Housing (March 2016) this sets out the required standards to ensure high quality residential developments
- b. Accessible London: Achieving an Inclusive Environment (October 2014)
- c. The control of dust and emissions during construction and demolition (July 2014)
- d. Town Centres (July 2014)
- e. Character and Context (June 2014)
- f. Sustainable Design and Construction (April 2014)

Haringey Local Plan Strategic Policies (2013)

6.2.7 Haringey's Local Plan Strategic Policies document highlights the importance of growth areas within the Borough. The Local Plan (2013) designates Tottenham High Road as an area for regeneration and this includes the Seven Sisters Corridor.

6.2.8 Policy SP1 of the Local Plan relates to managing growth within the Borough and states that the Council will focus on suitable locations to ensure that achieve strong, healthy and sustainable communities. The Site is located within the Seven Sisters Corridor Area of Change within the Local Plan which specifically highlights capacity for further growth.

6.2.9 The Local Plan sets out the future aspirations for Seven Sisters Corridor as follows:

- New housing and social infrastructure including, where appropriate and viable, the provision of new green space and community facilities;
- Ensuring that the Seven Sisters area and the tube and train station provides land marks/gateways to aid legibility through redevelopment and/or renewal;
- Comprehensive mixed use at St Ann's Hospital Site;
- Wards Corner regeneration delivering houses, shops and public realm improvements through redevelopment and/or renewal;
- Potential for future estate regeneration;
- NDC Legacy Spatial Framework and Neighbourhood Plan;
- Redeveloping Apex House as a strong district landmark building and gateway to Seven Sisters; and
- A decentralised energy hub serving surrounding schools and housing estates.

6.2.10 Other relevant policies are as follows:

- SP2-Affordable housing- borough target of 50% with maximum reasonable amount in individual sites
- SP4 Working towards a Low Carbon Haringey
- SP5 Water Management and Flooding
- SP6 Waste and Recycling
- SP7 Transport
- SP8 Employment
- SP9 Improving skills and training to support access to jobs and community cohesion and inclusion
- SP10 Town Centres
- SP11 Design
- SP12 Conservation
- SP13 Open Space and Biodiversity
- SP14 Health and Well-Being

Haringey Saved UDP Policies

- UD3 General Principles

- UD7 Waste Storage
- ENV6 Noise Pollution
- ENV7 Air, Water and Light Pollution
- ENV 11 Contaminated Land
- EMP4 Non employment generating uses
- EMP5 Promoting Employment Uses
- TCR2 Out of Town Centre Development
- TCR3 Protection of Shops in Town Centres
- M9 Care-free residential developments
- M10 Parking for Development
- OS17 Tree protection, tree masses and spines
- CSV 7 Demolition in Conservation Areas
- SSP21 Wards Corner and Council Offices at Apex House

Haringey Saved Policies SSP21

6.2.11 Site Specific Policy 21- Wards Corner and Council Offices at Apex House.

Existing use: Council offices. Proposal: Comprehensive mixed use development

Emerging Tottenham Area Action Plan December 2015

6.2.12 The pre submission draft of the AAP was considered by the Council at its meeting on 23rd November 2015 and was published for Reg 19 consultation 8th January 2016. Consultation closed on the 4th March. As such the AAP is considered to be a material planning consideration that can be accorded some, although not the same weight as the development plan. The document provides site specific and area based policy to underpin the delivery of the spatial vision set out in the adopted and proposed alterations to the Strategic Policies DPD and the suite of DPDs' emerging alongside the Tottenham AAP to articulate the spatial vision for growth.

6.2.13 Policy AAP1 seeks to ensure all development proposals submitted to the Council proactively respond to the vision and ensure the regeneration objectives for the Tottenham AAP area are achieved. It also places a responsibility on the Council to proactively work with landowners, the Mayor of London, the local community and other parties to help deliver the aims of the AAP. These aims include:

- To reduce social inequalities.
- Improve the quality and supply of housing to meet housing needs;
- Improve health and wellbeing.
- Create a diverse and sustainable economy.

- To deliver the necessary infrastructure to support change in Tottenham;
- To improve the local environment, reduce carbon emissions and adapt to climate change.

6.2.14 Policy AAP1 states that The Council expects all development proposals in the AAP area to come forward as part of wider comprehensive redevelopment proposals, taking account of adjacent uses (existing or proposed) and neighbouring landowner expectations.

6.2.15 The application site is located within the heart of the Seven Sisters Neighbourhood Area for which there are a number of site allocations, incorporating the site and adjacent land. The key neighbourhood area objectives are:

- Refocusing of retail floorspace within Seven Sisters/West Green Road District Centre at Seven Sisters end of West Green Road to enhance its retail characteristics;
- Redevelopment of key sites including Wards Corner, Apex House, Lawrence Road and Gourley Triangle
- Targeted streetscape and environmental improvements along West Green Road, Tottenham High Road and Seven Sisters Road including paving, signage, landscaping and street furniture;
- New affordable employment/workspace suitable for new enterprises and medium sized businesses as part of mixed use redevelopment at Gourley Place and Lawrence Road;
- A landmark tall building at Apex House providing significant new mixed tenure homes and ground floor space for employment/commercial space to complement development on the Wards Corner site;
- Targeted building and shop front/signage improvements consistent with the enhancement of the character, heritage and townscape attributes of the area alongside new development.

AAP Site allocation SS6: Apex House and Seacole Court

6.2.16 The Tottenham AAP designates the site for mixed use development with town centre uses at ground floor level and residential above.

6.2.17 The site requirements as set out within the AAP states that:

- Development will be required to be in accordance with a site-wide masterplan demonstrating how a comprehensive development can be brought forward, including in phases if necessary.
- Any proposed tall building must meet the requirements set out in policy DM6.

- This is a suitable location for a high quality tall building marking the location of the public transport interchange of train, tube, bus and Overground rail, and the junction of Seven Sisters Road and Tottenham High Road. Consideration should be given to the long views of this building, including the linear view along the High Road and Seven Sisters Road, as well as the effect on the microclimate.
- The tallest element of development will need to have regard to properties to the rear of the site, as well as to its relationship to other buildings along Seven Sisters and Tottenham High Road.
- Where necessary, the development should step down towards the lower density building to the south and south-west of the site.
- Any development proposal will be required to consider its relationship to the proposals for the Wards Corner site, as well as the provision of public space and public realm improvements to support access, both for arrival to Seven Sisters Station and for moving between this site and Wards Corner.
- Development should provide high quality public realm outside its active frontages.
- An active use on the ground floor of the Seven Sisters Road and High Road frontages is required.

The AAP sets out the following Development Guidelines:

- To help facilitate a coordinated approach towards development along the High Road and in particular Wards Corner, these two sites should combine to create a high quality public realm and positively enhance the significance of this important location within the conservation area.
- The Council will consider a range of town centre uses along the High Road frontage which could include small scale A1 retail located close to the apex with Seven Sisters Road. However along Seven Sisters Road, the Council will only permit secondary town centre uses such as use classes A2, A3, A4, A5, D1 or B1.
- Studies should be undertaken to understand what potential contamination there is on this site prior to any development taking place. Mitigation of and improvement to local air quality and noise pollution should be made on this site.
- Car free development is suitable for this site.
- This site is in a Critical Drainage Area and proposals should therefore refer to the Local Flood Risk Management Strategy.
- The existing mature trees along Tottenham High Road must be retained, and incorporated into the masterplan for this site.
- This site is identified as being in an area with potential for being part of a decentralised energy network. This may be as a decentralised energy hub, as a customer, or requiring part of the site to provide an easement for the network.
- If the site is to come forward in phases, each phase must not compromise the other.
- The servicing of the development should be provided from Stonebridge Road.

- This site is on the route of Cycle Superhighway 1, and cycle parking should be provided as part of any scheme.

Alterations to Strategic Polices DPD

6.2.18 The proposed changes to Haringey's Strategic Policies reflect a number of changes in the overarching planning framework at the national and regional level, which affect planning locally. The most significant being the adoption of the Further Alterations to the London Plan (FALP) that significantly increased Haringey's strategic housing target from 820 homes per annum to 1,502 homes per annum, effective from April 2015 – an 83% increase. The plan also reflects the more challenging position in respect of affordable housing delivery.

6.2.19 The pre-submission draft of the proposed changes to Haringey's Strategic Policies were considered by the Council at its meeting on 23rd November 2015 and was published for Reg 19 consultation 8th January 2016 consultation closed on the 4th March. As such this is considered to be a material planning consideration that can be accorded some weight, although not the same weight as the current development plan.

6.2.20 The changes to the following strategic policies and draft DPD's are relevant to this application:

Policy SP1: Managing Growth, raises Haringey's strategic housing requirement to 19,802 net new homes between 2011 – 2026 (rather than 8,200 between 2011-2026). The number of new homes expected to be accommodated in the Seven Sister Corridor) is also increased from 767 to 1,730 to 2026.

Policy SP2: Housing, is amended to reflect the increased housing target in SP1 and reduces the strategic affordable housing target from 50% to 40%.

Draft Development Management Polices DPD

6.2.21 This document introduces a set of detailed planning policies which give effect to the Spatial vision for the borough. The DM DPD updates local thematic planning policies for the borough, superseding the 2006 Unitary Development Plan, and a suite of Supplementary Planning Documents and Guidance notes. It will be used in the determination of planning applications in the borough. The pre submission draft of the DM DPD was considered by the Council at its meeting on 23rd November 2015 and was published for Reg 19 consultation 8th January 2016, consultation closed on the 4th March. As such the DPD is considered to be a material planning consideration that can be accorded some weight, although not the same weight as the development plan.

6.2.22 There are five main chapters in the document, each providing a set of policies covering the topics of Development and Design, Housing, Environmental Sustainability, Employment and the Economy, and Community Infrastructure.

6.2.23 A substantial number of the policies in the document are considered relevant to consideration of these applications reflecting changes in national policy as well as the outcome of the evidence based studies undertaken by the Council since the adoption of the previous plan. Amounting to a comprehensive suite of “development management polices” for the whole borough, and supplemented by the specific polices of the Tottenham AAP, the following are all considered to be relevant to the determination of the application:

Design & Character

DM1 Delivering High Quality Design (Haringey’s Development Charter)

DM2 Accessible and Safe Environments

DM3 Public Realm

DM4 Provision and Design of Waste Management Facilities

DM5 Locally Significant Views and Vistas

DM6 Building Heights

DM9 Management of the Historic Environment

Housing

DM10 Housing Supply

DM11 Housing Mix

DM12 Housing Design and Quality

DM13 Affordable Housing

Environmental Sustainability

DM19 Nature Conservation

DM21 Sustainable Design, Layout and Construction

DM22 Decentralised Energy

DM23 Environmental Protection

DM24 Managing and Reducing Flood Risk

DM25 Sustainable Drainage Systems

DM26 Critical Drainage Areas

DM27 Protecting and Improving Groundwater Quality and Quantity

DM29 On-Site Management of Waste Water and Water Supply

Transport & Parking

DM31 Sustainable Transport

DM32 Parking

Employment & Town Centres

DM37 Maximising the Use of Employment Land and Floorspace

DM38 Employment led Regeneration

DM41 New Town Centre Development
DM44 Neighbourhood Parades and other non-designated frontages
DM45 Maximising the Use of Town Centre Land and Floorspace

Community Infrastructure, Implementation & Monitoring

DM48 The Use of Planning Obligations
DM49 Managing the Provision and Quality of Community Infrastructure
DM55 Regeneration and Masterplanning

The assessment of the application has had regard to these emerging policies.

Urban Characterisation Study (part of the Local Plan evidence base)

- 6.2.24 Published in February 2015 as an evidence base for Haringey's Local Plan documents, the Haringey Urban Character Study is not adopted policy but is a useful guide for assessing development. It is intended to provide an objective, thorough and analytical outlook of the borough. It identifies the components of local character and distinctiveness and highlights those aspects which make Haringey unique. It will guide decisions on the location, type and form of new, including the location of tall buildings. The study evaluates and builds upon the existing evidence base, including conservation area appraisals, Upper Lee Valley OAPF, Open Space Strategy and other relevant documents.
- 6.2.25 In addition to being a formal evidence base to Haringey's planning documents, the study can be utilised as a general urban design reference document.
- 6.2.26 A key outcome of this study is to recommend suitable building height ranges across the borough, including proposing where 'high-rise' buildings may be suitable. The study notes that building heights across Seven Sisters should respond to the existing built form whilst looking ahead to future development opportunities and areas where an increase in height would be welcome.
- 6.2.27 The study notes; "the opportunity to mark the important node (where Seven Sisters Road and the High Road meet) with an elegant, slim tower that can successfully mark this activity node. This tower could rise to circa 20 storeys but would need to form part of a lower rise (4-6 storeys) perimeter block and care taken to ensure wind vortexes are not created around its base, negatively impacting upon the public space".

Other Relevant Publications/Documentation

- 6.2.28 In addition to the Development Plan Tottenham has been the focus of considerable public sector attention over the last 10 years, which has culminated in the production of a number of non statutory publications prepared following significant community engagement.

Upper Lea Valley Opportunity Area Planning Framework (SPG to the London Plan)

6.2.29 The Upper Lea Valley Opportunity Area Planning Framework (OAPF) (2013) covers over 3,000 hectares of land covered by the London Boroughs of Enfield, Haringey, Waltham Forest and Hackney and was produced by the GLA. The OAPF sets out the overarching framework for the area which includes the Site. The objectives for the Upper Lee Valley are set out as follows:

- Growth at Tottenham Hale, Blackhorse Lane, Meridian Water in Central Leaside and Ponders End.
- Optimised development and redevelopment opportunities along the A10/A1010 Corridor, in particular the Tottenham High Road Corridor and Northumberland Park.
- Over 15,000 new jobs by 2031 across a range of industries and a green industrial hub creating greater learning and employment opportunities.
- Over 20,100 new well designed homes by 2031.
Full integration between the existing communities and the new jobs, homes and services provided as part of the new developments.
- A Lee Valley Heat Network linked to the Edmonton Eco Park.
- Significant investment and improvements to transport infrastructure, including four trains per hour on the West Anglia Main Line and improvements to help people walk and cycle more easily through the area.
- A fully accessible network of green and blue spaces which open up the Lee Valley Regional Park. The networks between them will be improved benefitting both people and wildlife.

6.2.30 This site sits within the A10/A1010 corridor and in Seven Sisters which the SPG states will be a gateway into Tottenham and the High Road, a key part of the Seven Sisters gateway will be an opportunity for new residential-led development at Apex House". The SPG states that the area is subject to major development proposals, which taken together with the other growth areas, has the potential to improve the social, physical and environmental infrastructure of the A10/A1010 Corridor and to provide homes and jobs. The OAPF recommends clusters of sites that relate to existing centres, destinations, character areas and land uses.

The Tottenham Physical Development Framework (2012)

6.2.31 The Tottenham Physical Development Framework (PDF) was produced by Arup in 2012 for Haringey Council and highlights the scale of the opportunities within the Borough. The document was not consulted upon or adopted by the Council as planning policy and as such has no weight in planning terms. The document identifies Tottenham Green and Seven Sisters is the cultural and civic heart of Tottenham. It notes that the area is becoming known for a high-quality, well-connected public realm providing a welcoming place to do business and socialise throughout the day and evening.

6.2.32 The Framework considers Tottenham as one of London's key areas for growth and regeneration. It is expected that prior to 2025, there will be 5,000 new jobs, 10,000 new homes and more than 1 million sq ft of new employment and commercial space. The aspirations for this area include:

- The creation of up to 700 new homes around Tottenham Green and Seven Sisters Regeneration sites
- Tottenham Green becoming a better destination by improving the civic, cultural and education assets around the Green
- Retention of existing levels of employment, with the potential for increased numbers of start-up companies
- Enhanced public realm and green space
- Enhancing the distinctive retail offer along West Green Road
- Excellent public transport accessibility and new routes on the London Overground

The Tottenham Strategic Regeneration Framework (2014)

6.2.33 The Tottenham Strategic Regeneration Framework (SRF) prepared for Haringey Council sets out the vision for the future of Tottenham by outlining the key strategies that will be used to revitalise the area.

The SRF sets out a future vision for Tottenham that "By the age of twenty, a child born in Tottenham today will have a quality of life and access to the same level of opportunity that is at least equal to the best in London".

6.2.34 The SRF identifies Seven Sisters as the gateway to Tottenham noting that the area is becoming known for high quality, well-connected public spaces providing a welcoming place to do business and socialise throughout the day and evening. Improvements to the streets and the public realm will enhance the atmosphere in existing character areas such as West Green Road and the civic heart of Tottenham at Tottenham Green. This document has been used to inform the emerging Tottenham Area Action Plan which is discussed below.

Proposed uses and tall building

6.2.35 Haringey's Local Plan (2013) identifies the Site as part of the wider regeneration of Seven Sisters. The specific land uses and redevelopment of the site is set out clearly within the emerging Tottenham AAP which identifies the site for residential and town centres uses. The area and site is also identified as an area for growth in both the London Plan and the Upper Lee Valley Opportunity Area Planning Framework. The site lies within the OAPF as defined in the London Plan, and strong policy support for the regeneration of the area follows from this designation. The OAPF policy as well as other London Plan policies and Haringey's Local Plan, amongst other matters support a landmark building on this site and more generally support high density development including tall buildings close to existing rail and Tube stations within the area of the OAPF.

6.2.36 The quantum of residential development proposed, responds to the growing need for new homes (including affordable homes) identified in the Borough by the London Plan, and through the emerging Local Plan and is welcomed. The good accessibility to public transport, the cycle superhighway and proximity to the existing local facilities on Tottenham High Road is considered to represent a sustainable location for new homes. The provision of residential use is welcomed in this growth area, as it makes an important contribution to meeting the Council's London Plan housing target. Private Rented Sector (PRS) residential development is supported by the London Plan to address housing needs and increase housing delivery as is the provision of market housing.

6.2.37 The principle of a landmark building is supported by existing and draft policy subject to detailed consideration, in particular the impact on the historic environment and other surrounding heritage assets. The Tottenham AAP requires that the development of the site allocated will be in accordance with a site-wide master plan demonstrating how a comprehensive development can be brought forward. The development of Seacole Court does not form part of this proposal however the applicant has provided a masterplan showing a complementary re-development of Seacole Court which is considered to satisfy the requirement of the AAP.

Market/Flexible A2 (Financial and professional services, A3 (cafe restaurant, B1(business) use

6.2.38 The site is not within a defined town centre and lies immediately to the south of The West Green Road/Seven Sisters Town Centre, designated as a District centre. The proposal includes 879 sqm of commercial floorspace which can either accommodate a relocated Ward's Corner market if the existing market traders are in agreement or be use as a mix of A2, A3 and B1 uses.

6.2.39 London Plan policies state that retail and commercial development should be focused in town centres and Policy 4.8 gives specific support to markets. The site is on the edge of the district centre, and does not propose significant floorspace that might impact or undermine the vitality or viability of the defined town centre. The NPPF sets a threshold of 2,500 sq m above which an impact assessment is required and the 879 sqm proposed is significantly below this threshold. Ideally a relocated market must be as close as possible to the existing market and provides a relatively unique form of retail which would not raise concerns over its impact on the existing centre. The proposed market use is therefore considered to be in accordance with London Plan and local policies and welcomed.

6.2.40 In the event that the flexible floorspace is occupied by business floorspace, this would be supported by development plan policy. The London Plan seeks to develop and enhance capacity to support local activities (Policy 2.7). The

provision of business space will help achieve the objectives of Policy 4.2, as it will ensure the availability workspace that would be attractive to small and medium sized enterprises.

- 6.2.41 Haringey Local Plan Policy SP8 states the Council will secure a strong economy and support local employment and regeneration. Policy SP9 states that the Council will seek to address unemployment by increasing the employment offered in the borough. Saved UDP Policy EMP4 state that planning permission will be granted to redevelop or change the use of land and buildings in an employment generating use provided the redevelopment or re-use of all employment generating land and premises would retain or increase the number of jobs permanently provided on the site, and result in wider regeneration benefits and emerging policy DM40 of the Development Management, Development Plan Document (2015) continues this approach.
- 6.2.42 The proposal would result in the loss of the existing 3,487 sq.m. of office space on the site and the level of jobs provided would be significantly less than can be provided in the existing building. The proposal would provide significant regeneration benefits and is supported by the emerging AAP allocation which does not require re-provision of the existing office floorspace. The proposal is therefore considered acceptable in this respect.
- 6.2.43 It is considered that the principle of flexible floorspace whether used for town centre or business uses, or a mixture of both, accords with the relevant development plan policies and such uses are therefore acceptable and are welcomed. A financial contribution for the loss of the existing office floorspace is not considered necessary given the site allocation and the level of affordable housing provided.
- 6.2.44 The development will provide a significant number of new homes that will help to meet the Borough and London's wider housing needs in the future including 59 affordable housing units. The private aspect of the residential development will be for private rent (for a period of at least 10 years) which is welcomed as it will contribute high quality housing to the private sector stock which is a priority of Haringey's Housing Strategy 2009-19 and is supported by the London Plan. S106 obligations will ensure that the rented accommodation is well managed and offers longer term tenancies than usual to provide better security of tenure for future residents.
- 6.2.45 The proposals are therefore in line with national, London Plan and local policies. The principle of the uses are acceptable subject to further considerations including the design and impact on surrounding heritage which are dealt with below.

6.3 Regeneration

Background

6.3.1 The application site falls within the “top” 6% of deprived Local Super Output Areas in the Country. The 2010 Indices of Multiple Deprivation highlight that deprivation on the basis of access to suitable housing places Haringey in the top 5% of all Local Super Output Areas in the England. The 2011 Census meanwhile indicates that some 74.9% of Households in the area are classified as being deprived having regard to one of the four dimensions of deprivation.

Development Framework for Seven Sisters

6.3.2 The London Plan has identified the area as part of the Upper Lee Valley Opportunity Area. The Opportunity Area Framework, prepared with the Boroughs of Enfield, Hackney and Waltham Forest promotes the creation of 10,000 new jobs and 15,000 new homes in the area. London Plan policy 2.13 and 2.14 supports the delivery of the opportunity area objectives for the Tottenham High Road Corridor.

6.3.3 The key diagram to the adopted Strategic Polices Local Plan Document (2013) identifies the area as a place for growth and change. Although changes to the document have been agreed for publication at Regulation 19 stage the objectives and spatial (growth) strategy remain unchanged.

6.3.4 The Draft Tottenham Area Action Plan, outlines a spatial strategy for Seven Sisters and West Green Road that includes:

New landmark buildings around the station will help communicate the area’s significance as a vibrant district centre, a gateway into Tottenham, and a major transport hub – the latter to be further enhanced through investment as part of London’s Overground network and, in the longer term, Crossrail 2. Further public realm improvements are proposed to help address the current dominance of the heavily trafficked road network.

6.3.5 The AAP site allocation also highlights the role that the site will play in achieving the vision of the area and sets as a clear objective: “A landmark building.” The draft policy site requirements confirm that the site “...is a suitable location for a high quality tall building marking the location of the public transport interchange...” (Policy SS6).

6.3.6 The NPPF sets out the government’s definition of sustainable development. This includes consideration of economic, environmental and social effects and a presumption in favour of “sustainable development.” By way of the Localism Act 2011, Local Planning Authorities are now obliged to consider the economic effects of development.

6.3.7 In March 2014, following a significant consultation exercise (the results of which were summarised in the report “Tottenham Future”) Haringey Council adopted a Strategic Regeneration Framework. Although not planning policy the framework set out a new regeneration vision for the area:

By the age of twenty, a child born in Tottenham today will have a quality of life and access to the same level of opportunity that is at least equal to the best in London.

6.3.8 The Strategic Regeneration Framework (SRF) sets out “seven strategies for success:”

1. World-class education and training – including new schools, better access to apprenticeships and more Tottenham young people attending university;
2. Improved access to jobs and business opportunities attracting major investment and encouraging local business growth to boost employment;
3. A different kind of housing market – improving existing homes and building new, high-quality homes to meet demand at a range of prices and tenures;
4. A fully connected community with even better transport links – continuing to improve rail, Tube and bus links, including making the case for Crossrail 2, as well as opening up Tottenham to more walking and cycling routes;
5. A strong and healthy community – improved healthcare facilities, reduced crime and strong social networks for young people;
6. Great places – putting Tottenham’s character and heritage centre-stage while creating better public spaces to meet, shop and have fun;
7. The right investment and quality development – building partnerships and securing money to achieve these priorities with a focus on high quality design.

6.3.9 The SRF included a Delivery Plan with a focus on four priorities in the short to medium term to deliver the aspirations within the SRF and reflecting the aspirations collected through the ‘Tottenham’s Future’ engagement programme:

1. People: To deliver improved access to jobs and business opportunities; world-class education and training; and a strong and healthy community;
2. Place: Better caring for the place and delivering improved public realm in all of the local centres that comprise Tottenham (including redevelopment of Apex House for mixed-use housing and retail, and move of existing office accommodation to alternative premises).
3. North Tottenham including High Road West, a new stadium/leisure destination and a comprehensive estate regeneration and housing renewal programme; and
4. Tottenham Hale: a key area of opportunity in South Tottenham, building on the delivery of a new station and a range of mixed use development.

6.3.10 The strategy sets out a range of targets, including the delivery of up to 10,000 new high quality homes and the creation of over 5,000 new jobs and 1million sq ft of employment and commercial space by 2025.

Contribution of the Development to Regeneration

- 6.3.11 The Environmental Statement estimates that the construction phase of the development would create 180 construction jobs over the 2.5 year construction period and 279 indirect jobs per year in the supply chain. It estimates a £1.4 m net additional expenditure within local shops and services per annum which would support 10 new jobs. The new workspace could support 70 additional jobs and 25 indirect jobs in the supply chain.
- 6.3.12 If the existing market is relocated this would provide 50 FTE jobs. The option of flexible commercial floorspace could provide between 40 and 60 FTE jobs. This is estimated to result in a further 10 to 20 'spin off' FTE jobs within services and other business in the local area that would support businesses in the new space.
- 6.3.13 The scale of development will provide a significant number of new homes that will help to meet the Borough and London's wider housing needs in the future. The PRS element will provide greater stability and security for occupants and will deliver a significant quantum of new, well managed rented accommodation. In addition, the scale, duration and content of the development, subject to the measures to be secured through a S106 agreement to maximise local employment and procurement, and support construction and service based training programmes, will present opportunities for a significant and direct improvement in the economic wellbeing of the area.
- 6.3.14 Whilst it is impossible to precisely quantify the regenerative impacts (both in financial and non financial terms) of a development. The provision of a significant number of high quality new homes (including affordable housing) and employment opportunities are considered to result in significant, positive economic and social change in the locality. These factors weigh in favour of the scheme but must be considered in the round with the design and heritage impacts of the development.

6.4 Heritage

Background

- 6.4.1 The site is adjacent to the Seven Sisters/Page Green conservation area, with only the existing public toilets and the clock tower included within it. The conservation area forms part of the Tottenham historic corridor which covers an extensive area, stretching approximately 3.7 km between Enfield to the north and Stamford Hill to the south, to signify its importance as a Historic Corridor on the route of the Roman Ermine Street. The corridor is sub-divided into six conservation areas. To the east is the Page Green Conservation Area and to the South is the Seven Sisters Conservation Area.

- 6.4.2 An appraisal of the Seven Sisters and Page Green Conservation Areas was undertaken as part of a wider appraisal of the entire Tottenham High Road Historic Corridor and adopted on the 9th March 2009.
- 6.4.3 The appraisal notes that the Seven Sisters Conservation Area is focussed on the section of the High Road surrounding Seven Sisters Station and includes Broad Lane and adjacent residential streets. Within this area, the High Road is at its busiest and most divisive, and the busy junctions with Broad Lane and West Green Road with Seven Sisters Road have a significant influence on the area's character. In addition, the main entrances to the Seven Sisters underground station on either side of the High Road add considerably to the volume of pedestrian traffic in this area. Seven Sisters has also been earmarked for cross rail which is likely to bring substantial investment and improvement to public transport that could transform the area and its character further to an important multi-nodal hub of public activities.
- 6.4.4 The Council's Urban Characterisation Study states -'Opportunity to mark the important node (where Seven Sisters Road and the High Road meet) with an elegant, slim tower that can successfully mark this activity node. This tower could rise to circa 20 storeys but would need to form part of a lower rise (4-6 storeys) perimeter block and care would need to be taken to ensure wind vortexes are not created around its base, negatively impacting upon the public space.' (November 2015, page 125)
- 6.4.5 Opposite the site, the Wards Corner site has two approved schemes, one that replaces the existing buildings with a new seven storey block, with the upper two storeys set back; and a more recent alternative approval that retains the building with conversion of upper floors. Neither of the permissions have been implemented. Either of the schemes would have a cumulative impact on the heritage assets and their setting and has been addressed as such in the applicant's submission.
- 6.4.6 Immediately to the south is Seacole Court which is a three storey modern residential development and whilst in separate ownership, is likely to come forward for redevelopment in the future. The application documentation illustrates how the proposed development and future development of the site might co-exist.
- 6.4.7 The Seven Sisters/Page Green conservation area is primarily residential in use and Broad Lane and the surrounding streets are fronted by consistent terraces of Victorian dwellings, which provide the area with a degree of uniformity. Page Green Terrace, immediately opposite to the site, is set back from the Road behind screens of vegetation. The mature London Plane trees along this section of the High Road have a formative influence on the areas character and appearance.

- 6.4.8 The building on site is a 1980s three storey brick building with a setback fourth floor. The building addresses the 'apex' of the site with a chamfered edge facing the junction and a clock tower in front of it. Architecturally, the building is of very limited merit and whilst of a scale reflective of its adjacent neighbours, it does little to contribute to the setting of the conservation area. Most importantly, it fails to mark this important retail, transport and public activity node. Given the future relevance of the site, the existing building fails to add to its townscape significance.
- 6.4.9 Opposite the site, on the east side of High Road, just north of Page Green terrace is the Christ Apostolic Church: a two storey red brick building with white rendered detailing and prominent castellated turrets. The church building, which was originally constructed as a Salvation Army Citadel, is adjoined to the north by a single storey hall with a stepped gable. Both the church and the associated hall are locally listed buildings of architectural and historic interest and make a positive contribution to the streetscene. Any development on the site should assess and carefully consider the impacts on the setting of these locally listed buildings.
- 6.4.10 Further north, on east side of High Road, Nos. 220 to 224 High Road, (the former Barclay's Bank) is a Grade II listed building adjoining the south flank of Tesco's. It is a grand three storey corner building, with an additional attic storey with triple dormers with central segmental pediments within a tall slate roof. The classical red brick and sandstone building dates from 1902 and successfully defines the junction of High Road with Broad Lane.
- 6.4.11 The edges of the site, facing the High Road and Seven Sisters Road interfaces with the established Victorian scale, detailing and massing established within the wider conservation area and a new development should address this appropriately. Any new development should also be assessed on the basis of its impact on the Page Green Terrace, Nos 227-249 High Road (Wards Corner), the locally listed Apostolic Church, the statutorily listed Nos 220-224 High Road and the wider setting of the entire Historic Corridor, especially with respect to views from Tottenham Green and further north and south along the High Road. The development is also likely to have an impact on the setting of South Tottenham, Clyde Circus and St Ann's conservation areas along with long distance views from Bruce Castle and Park and Alexandra Palace and Park, views from Markfield Park, the Grade II Listed Markfield Beam Engine and from the Walthamstow wetlands.
- 6.4.12 NPPF chapter 12 'Conserving and enhancing the historic environment' and London Plan policy 7.8 'Heritage Assets and Archaeology' states that development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural

detail. Similarly Local Plan Policy (2013) SP12 seeks to ensure the conservation of heritage assets, their setting, and the wider historic environment.

- 6.4.13 Paragraph 129 of the NPPF states that the LPA should assess the particular significance of any heritage asset that may be affected by the development. Paragraph 131-2 states that the LPA should take account of the desirability of sustaining and enhancing the significance of heritage assets and that great weight should be given to their conservation. Paragraph 133 sets out that where a proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss.
- 6.4.14 Paragraph 134 of the NPPF sets out that where a development proposal will lead to less than substantial harm to the significance of the designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.
- 6.4.15 Paragraph 135 of the NPPF sets out that the effect of an application on the significance of non-designated heritage assets should be taken into account in determining applications. In weighing applications that affect directly or indirectly non designated heritage assets, a balanced judgment will be required having regard to the scale of any harm or loss and the significance of the heritage asset.
- 6.4.16 London Plan Policy 7.8 requires that development affecting heritage assets and their settings to conserve their significance by being sympathetic to their form, scale and architectural detail. Haringey Local Plan Policy SP12 requires the conservation of the historic significance of Haringey's heritage assets. Emerging policy DM9 of the Development Management, Development Plan Document (2015) continues this approach.
- 6.4.17 There is a legal requirement for the protection of the Conservation Area. The Legal Position on the impact on these heritage assets is as follows, and Section 72(1) of the Listed Buildings and Conservation Areas Act 1990 provides:
- 6.4.18 "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".
- 6.4.19 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.”

6.4.20 The Barnwell Manor Wind Farm Energy Limited v East Northamptonshire District Council case tells us that "Parliament in enacting section 66(1) did intend that the desirability of preserving listed buildings should not simply be given careful consideration by the decision-maker for the purpose of deciding whether there would be some harm, but should be given “considerable importance and weight” when the decision-maker carries out the balancing exercise.”

6.4.21 The judgment in the case of the Queen (on the application of The Forge Field Society) v Sevenoaks District Council says that the duties in Sections 66 and 72 of the Listed Buildings Act do not allow a Local Planning Authority to treat the desirability of preserving listed buildings and the character and appearance of conservation areas as mere material considerations to which it can simply attach such weight as it sees fit. If there was any doubt about this before the decision in Barnwell, it has now been firmly dispelled. When an authority finds that a proposed development would harm the setting of a listed building or the character or appearance of a conservation area or a Historic Park, it must give that harm considerable importance and weight. This does not mean that an authority’s assessment of likely harm to the setting of a listed building or to a conservation area is other than a matter for its own planning judgment. It does not mean that the weight the authority should give to harm which it considers would be limited or less than substantial must be the same as the weight it might give to harm which would be substantial. But it is to recognise, as the Court of Appeal emphasised in Barnwell, that a finding of harm to the setting of a listed building or to a conservation area gives rise to a strong presumption against planning permission being granted. The presumption is a statutory one, but it is not irrebuttable. It can be outweighed by material considerations powerful enough to do so. An authority can only properly strike the balance between harm to a heritage asset on the one hand and planning benefits on the other if it is conscious of the strong statutory presumption in favour of preservation and if it demonstrably applies that presumption to the proposal it is considering.

6.4.22 In short, there is a requirement that the impact of the proposal on the heritage assets be very carefully considered, that is to say that any harm or benefit needs to be assessed individually in order to assess and come to a conclusion on the overall heritage position. If the overall heritage assessment concludes that the proposal is harmful then that should be given "considerable importance and weight" in the final balancing exercise having regard to other material considerations which would need to carry greater weight in order to prevail.

Heritage Assessment:

Historic England’s view

6.4.23 Historic England has advised that the proposed tall building's relationship to the historic quality of the Tottenham High Road is of particular concern. It sets out that *'there is a notable impact given in the Townscape, Heritage and Visual Impact Assessment as Local View 05 looking south from Broad Lane. This takes in Page Green Common, home to the seven trees thought to commemorate the eponymous Seven Sisters, a site which contributes to the significance of the Seven Sisters and Page Green conservation area.*

6.4.24 *The attractive terrace of two storey houses seen across the Common also contributes to the quality and character of the area. The oblique angle from which the proposal will be seen shows the bulk of the building, and causes a harmful contrast in scale and character between the established historic environment, and the proposed new construction.*

6.4.25 *According to the terms of the NPPF, in order for this harmful impact to be justified there must be sufficient public benefits brought about by the proposals to outweigh the desirability of preserving the significance of the Conservation Area. We recommend that the application should be determined in accordance with national and local policy guidance, and on the basis of your specialist conservation advice.'*

6.4.26 Heritage England's response does not categorise the harm identified as either substantial (in which case the necessity test applies) or less than substantial (in which case the public benefit test applies). It is however assumed that because the letter refers to the public benefit test that Heritage England's assessment is one of less than substantial harm. The Council's Conservation Officer considers that the harm caused by the proposal is less than substantial and that accordingly the proper assessment (see above) is one of public benefit.

Mayor of London's view

6.4.27 The GLA's Stage One report noted that *the current building is considered to detract from the character and appearance of the Conservation Area, and it is noted that the Council's Conservation Area Appraisal makes no reference to the building or the clock tower. Its demolition is therefore supported.* The impact of the replacement buildings, and in particular the 22 storey building, on the Conservation Area and the locally listed buildings within it is illustrated in Local Views 1, 2, 4 and 5 in the applicant's THVIA. This demonstrates that the building will have some impact, since it is of a greater height compared to the lower rise, horizontal emphasis of the Conservation Area. In views from north and south within the Conservation Area the building will appear as a tall slender form, marking the junction of two major roads, as well as Seven Sisters Station. As discussed below, it is also recognised that there is justification for a tall building in this highly accessible location within the Opportunity Area. Although the building is visible in the town centre the setting of the Conservation Area, the

setting of the locally listed buildings, and the setting of the Grade II listed former bank.

6.4.28 The GLA do not consider this to harm the significance of these heritage assets. The tower is well proportioned and the architectural detail well considered. Notwithstanding the comments in paragraphs 44-53, the proposed building has a good relationship to the ground floor, clearly marks the station, and does not dominate the setting of the Conservation Area or listed buildings, unlike the current building, which is considered to be harmful to those settings. In coming to this conclusion, GLA officers have taken account of the strong presumption against granting permission that would harm the character or appearance of the Conservation Area, and have placed considerable importance and weight to the harm caused to the setting of the listed buildings.

6.4.29 The application has also been considered by the Council's Principal Conservation Officer whose assessment is set out below.

Principle of demolition

6.4.30 Given the building's limited or nil contribution to the setting of the various heritage assets, there would be no objection to its demolition from a conservation point of view. Any future development should enhance the setting of the conservation area and its wider context along with creating a strong townscape feature that would aptly highlight this important node and hub of public activities.

Impact of a tall building on the various Heritage Assets

6.4.31 In terms of the historic environment, a tall structure at this location would undoubtedly have an impact on the setting of the various designated, non-designated heritage assets as well as their setting. Guidance published in March 2015 by Historic England states- 'In the right place well-designed tall buildings can make a positive contribution to urban life. Past examples show us that they can be excellent works of architecture and some of the best post-war examples of tall buildings are now listed.'

6.4.32 Based on the understanding of local context by the applicant, such as urban grain, significant views and materials along with the Council's own documents such as the Conservation Area appraisal and the Urban Characterisation Study, it is considered that a tall building at this location could enhance the historic townscape of the area, anchoring the historic High Road to an important node that would be a pivotal hub of activities for this part of the borough.

Impact of the development on the immediate setting of the Seven Sisters/Page Green, South Tottenham and Clyde Circus conservation areas

- 6.4.33 Within the immediate setting the proposed scale and massing of the development would have an impact on the views and setting of the conservation area as well as the setting of the listed bank and the locally listed buildings. However, the shape of the block and elevation details means that the block would have differing levels of impact when viewed from different locations and distances.
- 6.4.34 At the base, the proposal would introduce a scale that is unprecedented within the existing scale of the conservation area. As such this would not be considered to preserve the setting of the conservation area or the listed and locally listed buildings and would cause less than substantial harm. However, at present, whilst an extremely prominent corner, the site has no significant architectural focal point and lacks 'legibility' and does not contribute to the setting of the heritage assets or the historic corridor. The new development would, by virtue of its scale and design, create an anchor point on the High Road that would 'highlight' the pivotal node that Seven Sisters is likely to become in the future. As such the Conservation Officer sets out that this would be considered a significant heritage benefit that would overcome the less than substantial harm to the setting of these heritage assets.
- 6.4.35 Along Seven Sisters Road, the impact of the north elevation facing the street is much larger in scale compared to the established three storeys terraces and blocks. Here, the development is considered to cause some harm to the setting of the Seven Sisters/Page Green as well as Clyde Circus conservation areas.
- 6.4.36 It is considered that this harm is mitigated by creating a seven storey block and setting back the upper two storeys- so that the structure recedes sharply from 23 storeys to an apparent height of five storeys (with the additional two storeys set behind). This transition creates a visual hierarchy with the established local townscape and is consistent with the approved Wards Corner redevelopment proposal on the site immediately opposite. The proposed materiality with contrasting palettes further articulates the facade. Overall, whilst the northern elevation would cause some harm to the setting of the conservation areas at its base, the transition in heights (including that established by the approved Wards Corner scheme) allows the impression that 'one is approaching an important node' creating an interesting townscape skyline that would ultimately enhance the setting of this part of the Seven Sisters/Page Green and Clyde Circus Conservation areas and would overcome the less than substantial harm to the setting of these heritage assets.
- 6.4.37 The east elevation fronts the High Road and given its width and overall height, would perhaps have the most impact on the setting of Page Green terrace as well as the Victorian two storey terraces along Broad Lane within Seven Sisters/Page Green Conservation Area. These parts of the conservation area are relatively quiet and residential and the development introduces a building of a scale that is significantly different to the existing. As such the development at this

location, opposite Page Green terrace and from the backdrop of the terraces along broad Lane (View 05 in the applicant's statement) would cause harm to its setting. Given the width of the High Road opposite Page Green terrace and the distance of the main tower from Broad Lane and South Tottenham, this harm is nevertheless considered to be less than substantial.

6.4.38 To mitigate this harm, the elevation has been broken down through the changing materials and differing depth, height and proportions in an attempt to resemble a cluster of blocks. By playing with the heights, materials and depth, the resulting elevation would suggest a group of towers- emerging at a distance in a town centre node. The impact of the tower(s) on Page Green terrace would also be partly mitigated by the London Plane Trees along the High Road, as they would continue to be prominent within the immediate setting of the terrace. In addition, the townscape benefits arising from the demolition of the existing building and its replacement with a landmark building of high quality design and its associated public realm benefits, would overcome the less than substantial harm to the setting of these parts of the Seven Sister/Page Green Conservation Area.

6.4.39 The west elevation is an internal elevation when viewed at a lower level at short range, although it will be visible at a higher level from the local area, and will result in a change to these views and will be also viewed from the surrounding area in longer range views outside of views from within the Conservation Area with some distant views from Alexandra Palace. The elevation on Stonebridge Road is primarily that of a domestic scale with townhouses along it. The impact of this elevation on setting of the Seven Sister/Page Green and Clyde Circus conservation areas would be negligible and would be overcome by the townscape benefits of the scheme. The south elevation would only have a visual impact on the setting of South Tottenham Conservation Area. Given the distance, this would be negligible and would be overcome by the townscape benefits of the scheme.

Impact of the tall building on the wider setting of the historic environment: including Historic High Road, Bruce Castle Park and Alexandra Palace Park

6.4.40 The northern elevation, when viewed from the High Road looking south, appears slim and sleek and would enhance the setting of the conservation areas. The linear elevation of the tower at this edge provides a sharp frame, mainly in glass, resulting in an elegantly designed tall structure that enhances the setting of the Historic High Road. This is also appreciated in long distance views from further north, such as Tottenham Green and Bruce Grove conservation areas. It also creates a legible landmark at this important location, terminating the southern edge of the retail parade of the High Road which continues northwards along Tottenham Green and Bruce Grove. As such the proposal would enhance the setting of the historic corridor and the conservation areas along it.

6.4.41 The block would also have a visual impact on the setting of the St Ann's and South Tottenham Conservation Areas. The tower would also be visible in long

distance views from Bruce Castle Park and Alexandra Palace Park. However, given the distance this impact would be negligible and would be overcome by the townscape benefits of the scheme.

Impact of the public realm

6.4.42 At the base of the tower the public realm proposed as part of the development would also have a significant and positive impact on the conservation area – building on recent changes as part of the Cycle Superhighway. Whilst high quality materials and landscaping would be pertinent, it is considered that the proposed public realm works outlined in the application are a vast improvement to the existing and would significantly enhance the setting of the conservation area at this junction.

Conclusion

6.4.43 The scale and massing of the proposed block would undoubtedly have a harmful impact (albeit less than substantial) on the immediate setting of the heritage assets within its vicinity including the local listed buildings, Seven Sisters/Page Green and Clyde Circus Conservation Areas. It would also have visual impact on the setting of St Ann's, Bruce Castle Park and Alexandra Palace Park Conservation Areas. However, the building has been designed to a high quality, in particular the 'point block' nature of the north elevation appears an elegant structure within the skyline. At the base, the receding heights along Seven Sisters Road and the varying depths and heights of the block, creating a block of buildings on the east elevation along High Road, mitigates the impact of the scale of the proposed structure. Additionally, the creation of a legible landmark to aptly anchor the High Road to an important node that would enhance the setting of the heritage assets would provide significant townscape and heritage benefits that would outweigh the less than substantial harm caused by the proposal.

6.4.44 Historic England's concerns are noted and applying its guidance it is considered that overall, whilst the proposal would lead to less than substantial harm on the setting of heritage assets, the scheme would also lead to significant townscape and heritage benefits that would ultimately enhance their setting. As set out in the NPPF paragraph 134 where a development proposal would lead to less than substantial harm the public benefits of the proposal should be weighed against this harm. The overall effect of balancing both the harm caused and heritage and benefit derived, leads to an overall heritage assessment of less than substantial harm which is outweighed by the townscape benefits of the proposal. In making this assessment great weight has been given to the preservation or enhancement of the heritage assets as per the Council's statutory requirement. The proposal is therefore considered acceptable in heritage terms subject to conditions on materials including those proposed for the public realm and landscaping and a section 278 agreement for public realm works.

6.5 Design, density and visual impact

Density

- 6.5.1 London Plan policy 3.4- Optimising Housing Potential states that taking into account local context and character development should optimise housing output for different types of location within the relevant density range shown in Table 3.2. The site is within an urban location where the density matrix sets a guideline of 200-700 habitable rooms (or 70-260 units) per hectare on a site such as this where the PTAL is 6.
- 6.5.2 The density proposed is 417 (163 units /0.39 Ha.) units per hectare and 1,192 (451/ 0.39) habitable rooms per hectare which exceeds the 70-260 u/ha and 200–700 hr/ha set out in the London Plan. Exceeding the density matrix does not mean that the development is automatically inappropriate for the site. In this regard the Mayor’s Housing SPG states that exceptionally, higher densities on individual developments may be acceptable where these can be clearly and robustly justified by local circumstances. They must be tested rigorously, taking account of different aspects of ‘liveability’ related to proposed dwelling mix, design and quality, physical access to services, long term management of communal areas, and the wider context of the proposal including its contribution to local ‘place shaping’ as well as concerns over ‘place shielding’. It is particularly important to take account of its impact in terms of massing, scale and character in relation to nearby uses, and design should be exemplary.
- 6.5.3 In this instance the proposal is located in a highly accessible location, directly next to Seven Sisters Underground station and has been specifically designed for rental meaning there will be good long term management of communal areas. It is considered to provide a good standard of accommodation with generous room sizes and good quality communal areas including private terraces, a resident’s lounge and gym. The proposal therefore can be considered acceptable if it has an acceptable impact on neighbouring occupiers and is in keeping with the scale and character of the surrounding area through exemplary design. As set out below officers consider that through the detailing of the scheme the design is exemplary and has an acceptable impact on the neighbouring occupiers and is in keeping with the character of the surrounding area. These matters are dealt with below.

Design Policy

- 6.5.4 The Council insists on high quality design. In accordance with government guidance in paragraph 64 of the NPPF, design should be high quality and take the opportunities available for improving the character and quality of an area and the way it functions. SP11 and sets out the Council’s approach to ensuring that design in the borough is of the highest possible quality as well as being

sustainable and conserving the borough's heritage. SP11 sets out the Council's general policy on design, which is 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.

6.5.5 With regard to Tall building SP11 states that they will be assessed against the following criteria:

- an adopted Area Action Plan or existing adopted masterplan framework for the site and surrounding area;
- assessment supporting tall buildings in a Characterisation Study which should be prepared as supporting evidence for all AAP areas;
- compliance with the Development Management Policies criteria for Tall and Large Building siting and design;
- compliance with all the relevant recommendations as set out in CABE / English Heritage "Guidance on Tall Buildings", 2007.

6.5.6 Policy AAP 6: 'Urban Design and Character including Tall Buildings' of the emerging Tottenham Area Action Plan deals with the issue of tall buildings and urban character. It establishes the principle that building heights need to respond to the existing street hierarchy. It asserts that buildings should be taller on main streets and within town centres and decrease gradually as you move away. This is considered a key component in creating legible neighbourhoods and places which is a key objective of the Tottenham AAP. This approach is also in line with Policy DM6 of the draft Development Management DPD.

6.5.7 AAP 6 states that taller buildings will be appropriate along (parts of) Tottenham High Road and Seven Sisters Road The appropriate height of development sites within Tottenham will be guided by the principles in Local Plan Policy DM1, and DM6, the reorientation of Tottenham Hale from an urban to a central area, the policy below, and the Site Allocations included in the Neighbourhood Areas Chapter.

6.5.8 DM1 of the emerging development management policies DPD contains the "Haringey Development Charter. This seeks to ensure that new development meets a number of requirements:

All development and changes of use must achieve a high standard of design and contribute to the distinctive character and amenity of the local area. The Council will support design-led development proposals which meet the following criteria:

- Relate positively to neighbouring structures, new or old, to create a harmonious whole;*
- Make a positive contribution to a place, improving the character and quality of an area;*
- Confidently addresses feedback from local consultation;*

- d. *Demonstrate how the quality of the development will be secured when it is built; and*
- e. *Are inclusive and incorporate sustainable design and construction principles.*

6.5.9 The policy is accompanied by a suite of design standards covering the character of the development, privacy and amenity considerations and landscaping. DM2 seeks to ensure new developments are safe and accessible and promote wider use by everyone. DM3 provides a policy framework for the delivery of public art within the public realm and for the creation of accessible and well managed private open space within development. DM6 'Building Heights' expects building heights to be of an appropriate scale which respond positively to the site's surroundings, the local context, and the need to achieve a high standard of design. Proposals for taller buildings that project above the prevailing height of the surrounding area must be justified in community benefit as well as urban design terms. It states that tall buildings will only be acceptable in areas identified on Map 2.2. The Map (as expected to be updated to correct the accidental omission of the site and to accord with the Urban Characterisation Study and Policy SS6)) identifies the site as suitable for a tall building. In addition DM6 states that tall buildings should also act as landmarks, identifying locations of civic importance, major public transport interchanges, and areas of high visitation. They should also be elegant and well proportioned, and visually interesting when viewed from any distance or direction; and positively engages with the street environment.

6.5.10 Good design is also central to all objectives of the London Plan and is specifically promoted by the policies contained within chapter seven, which addresses both general design principles and specific design Issues. London Plan Policy 7.1 sets out a series of overarching design principles for development in London. Other design policies in this chapter and elsewhere in the London Plan include specific design requirements relating to maximising the potential of sites, the quality of new housing provision, tall and large-scale buildings, built heritage, views, and the public realm. New development is also required to have regard to its context, and make a positive contribution to local character within its neighbourhood (Policy 7.4).

Townscape and Visual impact assessment

6.5.11 At 23 storeys the proposed tower building is of considerable scale and height. The Environmental Statement accordingly includes a landscape and visual impact assessment which follows the approach recommended in the Guidelines for Landscape and Visual Impact Assessment by The Landscape Institute and Institute of Environmental Management and Assessment. The Assessment draws on the London View Management Framework SPG (Mayor of London, 2012) and Guidance on Tall Buildings (English Heritage and CABI, 2007). It also reflects advice from Historic England (formerly English Heritage) on Seeing the History in the View – Managing Significance in Views (2011).

6.5.12 The Council has adopted Supplementary Planning Guidance (SPG) 1c Strategic Views. The SPG provides detail on the protection required for the strategic views between St Paul's Cathedral and Alexandra Palace. It identifies four zones of the strategic view for protection: the Viewing corridor; the wider setting; the mid-ground; and the foreground. The application site falls outside all four of these zones.

6.5.13 The ES has assessed the visual impact of the Proposed Development from 23 positions. These include 7 local views and 16 distance views at different times of the day. The short range views are taken from:

- South along Tottenham High Road (from southernmost tip of Tottenham Green)
- South along Tottenham High Road (from the intersection with Broad Lane)
- Northeast along Seven Sisters Road (from Seven Sister's train station exit)
- North along Tottenham High Road Rendered
- South from Broad Lane looking over residential terraces Rendered
- North east from the intersection of Seven Sisters Road and St Ann's Road
- North from the intersection of Tottenham High Road and St Ann's Road

6.5.14 The assessment of the short range views find the impact to be largely positive with the only minor negative impact when the proposal is viewed south from Broad Lane looking over residential terraces, aligning with the Conservation Officer's assessment of less than substantial harm. The applicant's assessment notes that "from this position the eastern side of the Proposed Development would be highly visible, marking the centre of Seven Sisters. It contrasts sharply with the scale, horizontal line and domestic character of the houses in the foreground, but is of sufficient distance not to dominate the houses or to affect their amenity. The tiered articulation of the building, stepping away as it rises, provides a satisfactory composition akin to a cluster of four towers. This helps to offset concerns about the building's bulk or proximity".

6.5.15 The long range views are wide ranging and taken from the following locations:

- Tottenham Green north west corner, junction of Philip Lane and Town Hall
- High Cross Monument, at the junction of the High Road with Phillip Lane
- Watermead Way bridge over Lee Valley Railway
- Forest Road, close to junction of Blackhorse Lane
- From within Walthamstow Wetlands
- From Clapton Common
- From the Stamford Hill crossroads
- Ermine Street (A10) corridor

- From Stamford Hill Station (from the ticket hall above the eastern platform)
- Seven Sisters Road (halfway between Woodberry Grove and Amherst Park)
- From the pedestrian bridge over Harringay Station on the east coast main line
- Pemberton Road
- St Ann's Road in the vicinity of Chestnuts Park and St Ann's Hospital
- West Green Road at West Green
- Western side of Downhills Park, beside Belmont Road from within the park
- From terrace in front of Alexandra Palace

6.5.16 The assessment of the long range views find the impact to be nil or negligible so its impact would not extend far beyond the immediate area around the site.

6.5.17 The applicant's assessment concludes that *"The photomontages demonstrate that the Proposed Development contributes to the identified Strategic Townscape and Visual Objectives and thereby has the potential to form a positive change in the townscape. The overall effect is to preserve, and in some views enhance, the character and appearance of the Tottenham High Road conservation areas, It will enrich the townscape and skyline by replacing the current Apex House with a building of demonstrable architectural merit and one that will make a very positive contribution at pavement level. The settings of designated and undesignated heritage assets have been examined, especially those of the Seven Sisters/Page Green and Tottenham Green Conservation Areas. Their significance would be unharmed by the introduction of the Proposed Development. The setting of the nearest listed building, the bank on the corner of Broad Lane, will not be adversely affected, nor will the settings of locally listed buildings in the vicinity of the Site."*

6.5.18 The conclusions of the applicant's assessment on views is accepted by officers. The project will result in obvious change to the appearance of the site in surrounding streets, which when considered in the round is positive. The physical impacts of that on amenity are considered separately (as are the impacts upon microclimate). The proposed development will significantly enhance the legibility of the area and reflects the scale and extent of ambition for the area contained within the adopted and emerging policy for the area and the potential impact is recognised and reflected in the quality of the proposed architecture, in accordance with adopted and emergent design policy requirements.

Quality Review Panel

6.5.19 Haringey's recently established Quality Review Panel (QRP) has considered the development proposals on two separate occasions 13th May and 19th August 2015. The panel's comments are reproduced in full in the appendices;

the panels review in 19th August 2015 are nevertheless also set out and addressed below.

QRP Comments	Response
<i>Scale and massing</i>	
<p>At the previous review, the panel expressed concerns that the development would appear as a slab block in views from Seven Sisters Road. This aspect of the scheme remains unchanged.</p>	<p>This concern is noted however the applicant has nevertheless articulated an alternative position which reflects the aspirations for the design and relates this to the quantum of new homes (including affordable homes) included. The development requires this depth and height at the rear otherwise the main tower would need to increase in height.</p>
<p>Whilst the panel supports the principle of a tall building on this site, it thinks that the scheme as a whole represents overdevelopment of the site.</p>	
<p>For example, the panel's previous concerns about creating a human-scaled base to the development have not been addressed. In particular the panel is concerned about the 'wall like' appearance of the building from surrounding streets due to the length and height of the facades.</p>	
<p>In addition, the panel is also concerned that the 7 to 8 storey height of the lower portions of the building may set an unfortunate precedent for Seacole House.</p>	<p>As set out above the density is outside the range set out in the London Plan but given the high accessibility and the provision of PRS which will be well managed the proposal is not considered to result in overdevelopment.</p> <p>The AAP allocation includes Seacole Court and requires a site wide masterplan demonstrating how a comprehensive development can be brought forward. The proposal includes an indicative design proposal showing how the larger scale redevelopment of Seacole Court would integrate with the proposed building and neighbouring buildings without raising any significant design concerns. Therefore this element of the design is not considered to set an unwanted precedent.</p>
<p>The panel also notes that the quality of environment on the terrace facing Tottenham High Road would be improved if this were one floor lower, allowing views into the canopy of existing trees, rather than above them.</p>	<p>The first floor residential units would have winter gardens which will afford views onto the tree canopies while mitigating against pollution from the high road.</p>
<p>Whilst the panel was told that views analysis has been carried out to demonstrate the impact of the development in wider views, this</p>	<p>As part of their Environmental Statement the applicant has provided a Townscape, Heritage and Visual Impact Assessment which has been considered above.</p>

information was not presented.	
There was also a lack of information to demonstrate how the development will preserve and enhance the character of the Seven Sisters Conservation Area.	Further to their Townscape, Heritage and Visual Impact Assessment and provided a heritage statement to provide further scrutiny of the close-range heritage impacts. This identifies some harm to the conservation area but considers it be outweighed by the benefits of the design of the proposal.
<i>Microclimate</i>	
Wind analysis has informed detailed design development since the previous review – for example using projecting balconies and canopies at first floor level to mitigate downdraughts.	The applicant has carried out extensive modelling and the screen, amongst other measures are necessary to provide sufficient mitigation.
A 'wind screen' is also proposed between the tower and lower block on Seven Sisters Road.	The flats closest to the wind screen would be dual aspect with windows in the north and west elevations. It is noted that there are single aspect flats further along the building where the bedrooms will look onto this screen. Given the screen is north of these windows and the living areas are not likely to be affected then the quality accommodation will be good quality.
This screen would block views from single aspect units facing towards it, and the panel think other means of mitigating wind conditions associated with the tall building should be explored.	
For example, a less narrow gap between the tall building and 8 storey block on Seven Sisters Road, may create less of a wind tunnel effect.	
It would also be helpful to show analysis of wind conditions on balconies, to demonstrate that these will provide genuinely usable outdoor space.	The results of the assessment of the roof terraces showed that these were largely within the comfort criteria for sitting and standing, especially on roof terraces 1 and 2 (refer to the report for details). The assessment did identify areas of increased windiness on roof terrace 3. However, with the benefit of mitigation in the form of glass screens on the balcony edges, the results of the wind assessment for safety indicate that wind conditions remained safe for all the roof terraces.
It will be essential that the development goes beyond the standards of wind safety assessments to ensure that there will be a pleasant, comfortable environment for people walking or sitting at street level.	The submitted Wind Mitigation Report also demonstrates that balconies have been tested at all levels to confirm that they meet the comfort and safety criteria and can therefore be used as genuine outside space for future residents.

<p>The panel recommends that the planning authority should obtain an independent expert assessment of wind conditions for Apex House, to advise on the issues above.</p>	<p>Noted, an independent review and further wind modelling has resulted in a change to the wind mitigation proposals these now comprise a screen between the two Apex House building elements, a glazed screen to Apex House at ground floor level and the addition of a small wind screen to the proposed Wards Corner building. With these amendments the proposal is considered acceptable.</p>
<p>Residential accommodation</p>	
<p>The scheme includes a relatively high proportion of east or west facing single aspect flats, and overheating may be a problem for these, as they will not benefit from cross ventilation.</p>	<p>There are some single aspect units and overheating has been raised as a concern by the Council's Head of Carbon Management and the GLA but further information has been provided to address these concerns.</p>
<p>Whilst recognising that Haringey's policies do not demand dual aspect for east or west facing flats – the panel notes its view that single aspect flats should be avoided.</p>	
<p>Additional modelling could help to shade the facades, but high performance glazing may also be required.</p>	<p>Following the applicant's response to overheating concerns it was found that no further modelling or mitigation was required.</p>
<p><i>Commercial space</i></p>	
<p>A single storey, double height commercial space is proposed, stretching back into the centre of the Apex House site.</p>	<p>The commercial space is proposed to allow for the replacement of the existing market at Ward's Corner. If the market is not re-located then it would become a mix used employment use. An employment use is important to replace the existing employment floorspace and ensure an economically active ground floor to the street - so as to contribute positively to the town centre/locality. This is considered, on balance, to be preferable to further private amenity space.</p>
<p>Whilst the aspiration to create a mixed-use development is positive, the panel continues to think this would be at the expense of maximising the quality of the development for residents.</p>	
<p>For example, if the commercial space was omitted, it would allow for the creation of a shared private garden for residents.</p>	
<p>The commercial space also continues to lack a prominent street entrance.</p>	<p>The commercial space would have entrances on Seven Sisters Road and Tottenham High Road and access from the courtyard so would have a good street presence.</p>
<p>If the commercial space could be accommodated at the base of the</p>	<p>The ancillary residential space at ground is a vital part of the amenities offered to</p>

residential buildings, this could address both the prominence of its entrances, and free the courtyard for use by residents.	residents. This includes a large residential lounge, gym and concierge as well as a small commercial space.
However, if this is not possible, because of the demands of tall buildings on ground level accommodation, the panel think it would be preferable to omit the commercial space.	The commercial space required is considered to make an important contribution to the street around the building's perimeter. It also has potential role in meeting employment space aspirations for the area and could become a new location for the indoor market.
<i>Architectural expression</i>	
Design development in terms of architectural expression has taken place since the previous review, and the panel supports the choice of brick and some aspects of the detailed façade design.	Noted.
However, this work has primarily focused on the upper storeys of the building, and the panel think the lower storeys deserve equal consideration – determining the quality of the development at street level.	Following QRP comments detailed studies of the facade across the entire building, were submitted with the application, which show that the lower portions of the building have been given equal consideration and would have attractive detailing as shown in the proposed 3D images. The ground floor is articulated with a colonnade which frames the public activities that take place within the building.
Metal cladding to the north and south elevations may look flat and featureless.	The applicants considered the metal cladding important in further articulating the facade. Officers accept this view.
The panel also thinks that the stack of projecting balconies now proposed, is less successful in articulating the east and west slab block elevations.	The projecting balconies appear on the West/ East facades in one location only in order to help define the different heights as well break down the massing of the building
Involving an artist could bring fresh thinking to decisions about materials and colour.	The applicant is looking to involve a local artist in the design of the wind screens would welcome this as a condition.
<i>Landscape and street design</i>	
Some further information was provided at this review on landscape design, however the panel continue to think that further information on this should be provided.	Further details have been provided in the design and access statement submitted with the application. This sets out in detail how the applicant has approached the design of the public realm to create a

<p>The quality of environment created at street level will be essential to the success of the scheme, as a focal point for Seven Sisters, next to the underground station.</p>	<p>vibrant, attractive area as a southern anchor point to the High Road.</p>
<p>Landscape design for this scheme should include improvements to the pedestrian crossing towards the station – as part of a generosity towards that wider area that should be expected of any tall building proposal.</p>	<p>Works are currently underway for the Cycle Superhighway which will result in changes to the junction of the High Road and Sevens Sisters Road opposite the site.</p>
<p>The mature trees on the High Road are a valuable asset but the panel is not convinced the scheme is makes the best use of these. For example the tree top level terrace could sit lower to enjoy the trees around, rather an above as now proposed.</p>	<p>As set out above the first floor residential units would have winter gardens which will afford views onto the tree canopies while mitigation against pollution from the high road.</p>
<p>Planning officers should also assure themselves that adequate root protection area will be achieved, to ensure the trees survive construction of the scheme.</p>	<p>The Council’s Tree Officer has raised no objections subject to a tree protection method statement. This will ensure the trees are adequately protected during construction.</p>
<p>Seating is proposed towards the High Road, but this location next to a busy road, east facing so shady in the afternoon and evening, may not be a pleasant place to sit.</p>	<p>As set out below the proposal includes a quieter courtyard away from the high road, more detail has been provided including visualisations of the area onto the High Road. These show that the planting and trees could provide relatively secluded seating areas close to the building.</p>
<p>Where planted roofs are proposed, more detailed information will be needed to demonstrate the extent to which planting will be feasible.</p>	<p>These details will be conditioned to ensure the planting scheme in appropriate for these locations.</p>
<p>Further detail is also needed on the design of the ground level courtyard, provision of play space, and residential amenity space at all levels of the scheme.</p>	<p>Further details have been provided of the courtyard including the surface treatment and street furniture. The play spaces are set out on the deck level and designed to provide distinct formal an informal play areas which sit comfortably with the general areas of open space.</p>
<p>In terms of soft landscape, the panel would encourage abundant floriferous planting.</p>	<p>The final details of the landscaping will be secured by condition.</p>
<p>Summary</p>	

A significant number of strategic issues raised at the previous Quality Review Panel meeting to discuss this scheme remain to be addressed. Whilst progress has been made in terms of materials and construction, internal layout and wind analysis, the panel continues to have concerns about fundamental aspects of the scheme, including its scale and massing, microclimate, quality of residential and commercial accommodation, and landscape design. These issues will need to be addressed before the panel would support a planning application for this development. More detailed comments are provided below, and comments made at the previous review that remain relevant are repeated for clarity.

Accessibility

6.5.20 Local Plan Policy SP11 'Design', Saved UDP Policy UD3 'General Principles' and emerging Development Management Policies DM2 'Accessible and Safe Environments' all support and encourage accessible and inclusive design. London Plan Policy 7.2 'An Inclusive Environment' is to ensure that proposals achieve the highest standards of accessibility and inclusion.

The proposal has been designed to ensure that all units meet Lifetime Homes Standards and 10% are wheelchair accessible. The public realm around the site has been designed to be inclusive, provide physical accessibility to people of all ages and those with disabilities. All space and routes will be illuminated with tactile paving to assist those with impaired sight. Gradients of all paths will be less than 1 in 20 to avoid the need for ramped access. Street furniture has been located to avoid clutter or obstruction. The proposal is therefore considered to comply with the above policies.

Public Realm

6.5.21 In respect of the public realm proposed within the site the QRP noted that the quality of environment created at street level will be essential to the success of the scheme, as a focal point for Seven Sisters, next to the underground station. This is consistent with Policies SP11 and draft policy DM1 of the Local Plan. The applicant has responded advising that there is a mixture of high quality seating and landscape furniture throughout the development including within the quieter courtyard away from the High Road. With regard to the soft landscape more detail has been provided including visualisations of the area onto the High Road. These show that the planting and trees could provide relatively secluded seating areas close to the building which with further details of the planting could provide a high quality and useable public realm. Further details have been provided of the layout and design of the internal courtyard and deck level terrace. The plans show a central seating area within the courtyard which will give the courtyard a human scale and provide areas for children to play under supervision. The layout would also facilitate external use by patrons of the market or office use but would be at a

scale that would still be attractive to residents. The roof terraces would be laid out to provide separate areas for under 5 and over 5 play and landscaped areas for casual use which will be enclosed by planters and furniture.

- 6.5.22 Overall the proposal public realm around the site is considered to have responded to the concerns of the QRP and would provide high quality and useable spaces for residents and patrons of the commercial uses without compromising either of these users.

Design conclusion

- 6.5.23 The visual and townscape assessments accompanying the application demonstrate that the scale of development proposed within the application will have a significant impact on the appearance of the area locally but in the round will have a positive impact by enhancing the legibility of the area.
- 6.5.24 The quality of the design has been considered by officers in addition to the QRP and GLA. A significant number of responses to the consultation exercise have also highlighted the design, scale, and impact of the proposed development. As set out above through the pre-application phase, the QRP raised a number of concerns in relation to the quality of the design. The applicant's submission has sought to address many of these concerns. The requirement in the Mayors SPG and of policy (including SPG) is that the height and scale of the development must be fully justified – particularly where densities within the London Plan density matrix are exceeded. The applicant has considered other options that would enable the development outcomes expected by the current application to be achieved – but concluded with officers that the requirements for additional height that would be required to provide a similar number of new homes, and maintain the affordable housing commitment, would be undesirable.
- 6.5.25 Considering all of the matters carefully, and balancing the design response with the aspirations of policy for the site, for Tottenham and Seven Sisters and for meeting housing need through a range of housing types – including affordable housing officers consider that the proposals can be considered to satisfy the policy objectives for design, height, scale and density in this location. At the pre-application stage, the QRP were not satisfied with the depth and massing of the building and the relief of the flank elevations and their concerns with the footprint of the buildings have not been directly addressed. The application has nevertheless been accompanied by further assessment and refinement in response to the QRP comments – and technical concerns. The QRP's view is different to the conclusions of the GLA at stage 1 and officers are also satisfied that, on balance, the proposals demonstrate compliance with design policy. As noted by the QRP the quality of detailing in the proposal is considered to be high quality and the design is considered to

preserve and enhance the conservation area. The scheme also provides safe and accessible buildings and open spaces.

- 6.5.26 Although significant objection has been received concerned with the height, scale and design of the scheme on the basis of the Local Planning Authority's assessment of the design merits, the scheme is considered to demonstrate high quality design as required by existing and emerging development plan policies and is therefore acceptable.

6.6 Affordable housing, mix and quality

Affordable Housing

- 6.6.1 The London Plan through Policy 3.11 seeks to maximise affordable housing provision across London and seeks to provide an average of 17,000 more affordable homes per year up to 2031 and requires 60% of affordable housing to be for social and affordable rent and 40% for intermediate rent or sale.
- 6.6.2 London Plan Policy 3.12 notes that in negotiating affordable housing on individual private housing and mixed use schemes Local Planning Authorities "should take account of their individual circumstances including development viability, the availability of public subsidy, the implications of phased development including provisions for reappraising the viability of schemes prior to implementation ('contingent obligations'), and other scheme requirements".
- 6.6.3 Haringey Council's affordable housing policy is contained in Policy SP2 of the adopted strategic policies DPD (2013). This requires that the subject to viability schemes meet the 50% affordable housing borough wide target. The alterations to the Strategic Policies DPD, considered by Full Council in November, propose reducing this requirement to 40%, based upon evidence of development viability. The NPPF re-affirms the government's commitment to ensure that obligations imposed by the planning process do not threaten the deliverability of sustainable development proposals.
- 6.6.4 The proposal provides for 59 affordable rented units or 181 Habitable rooms out of a total of 463. All of these would be affordable rent. Consisting of a mix of 1, 2 and 3 bedroom flats and 4 Townhouses with the flats located on the lower floors of the tower and in the 7 storey block facing onto to Seven Sisters Road and the townhouses set along Stonebridge Road.
- 6.6.5 The number of affordable units provided equates to 39% based on habitable rooms. This is below the adopted Local Plan and London Plan target borough wide target of 50% but close to the 40% target within draft Policy SP2 contained in the proposed Alterations to the Strategic Policies Local Plan. The applicant has accordingly submitted an economic viability assessment to justify the level of on-site affordable units offered. The Council has appointed Carter Jonas to provide

expert, independent advice on development viability in this case. They have provided a report to the Council which confirms that the proposed development provides the maximum level of affordable housing that the site can viably support.

- 6.6.6 Concerns have been raised that the affordable rented housing is not truly 'affordable'. The housing mix and rent levels on the Apex House site were set in negotiation with the council as part of the land sale agreement. Given the adjacent site at Wards Corner is private housing for sale and the tower at Apex House is Private Rented Accommodation, it was thought appropriate to prioritise the site for the maximum number of affordable rented units as possible within the design envelope for each block and the viability of the scheme. In ordinary circumstances affordable rents are set at up to 80% of market rents, however, in this case the council has proactively sought to keep rents as affordable as possible for families, including those households reliant on Housing Benefit. All family sized dwelling rent levels have been set within local housing allowance: 3/4 bed units will be pegged at rents of 50% of market level, 2 beds will be at 65% of market levels while the 1 beds will be at 80% of market and will be prioritised for working households from the council's housing register.

Housing mix

- 6.6.7 London Plan Policy 3.8 requires new residential developments to offer a range of housing choices, in terms of the mix of housing sizes and types, taking account of the housing requirements of different groups and the changing roles of different sectors, including the private rented sector.
- 6.6.8 Officers need to be convinced that the private and affordable housing dwelling mix for all residential development proposals in the borough is acceptable in order to achieve mixed, sustainable and cohesive communities. Each individual scheme should be considered in its local context, availability of subsidy and viability.
- 6.6.9 The proposal is for 163 residential units. The general housing mix is as follows:

No. of bedrooms	No. of units	% of units
1 bed units	72	44
2 bed units	59	36
3 bed units	28	17
4 bed units	4	3
TOTAL	163	100

6.6.10 Although the proposed housing mix has a large number of 1 and 2 bedroom units, the proposed mix is accepted by the Council's Housing Design and Major sites team and is considered to address local housing need. The proposal is a high density scheme designed for PRS accommodation at an accessible location therefore a larger number of smaller units is appropriate on a site of this nature. The proposal does however provide good quality family housing offered in the affordable townhouses provided on Stonebridge Road. Therefore the proposed mix of housing units is considered acceptable.

Layout and standard of accommodation

6.6.11 London Plan Policy 3.5 'Quality and Design of Housing Developments' requires the design of all new housing developments to enhance the quality of local places and for the dwelling in particular to be of sufficient size and quality. The Mayor's Housing SPG sets out the space standards for all new residential developments to ensure an acceptable level of living accommodation offered.

6.6.12 Local Plan Policy SP2 'Housing' states that high quality new residential development in Haringey will be provided by ensuring that new development complies with the housing standards and range of unit sizes set out in the Council's Housing Supplementary Planning Document (SPD) 2008 and is built to 100% Lifetime Homes Standards.

6.6.13 In assessing the proposal against these requirements, all 163 flats will comply with the above standards. The London Plan also sets out the minimum space standards for individual rooms. All the individual rooms will be compliant to the London Plan minima

6.6.14 A detailed analysis has been undertaken to examine the amount of daylight enjoyed by the habitable rooms which shows that overall the proposal would be in line with BRE guidelines and will receive acceptable levels of internal daylight. Some 39 rooms do not achieve the BRE average daylight factor (ADF) levels set out in the guidance 10 of which are internal courtyard bedrooms. The remaining 29 are large multi-function rooms which contain a kitchen element. The kitchen element within these rooms is, in most cases, located at the rear of the room with the intention of it being artificially lit. BRE guidance accepts this situation may exist, stating that "If the layout means that a small galley-type kitchen is inevitable, it should be directly linked to a well day lit living room." The overall level of daylight amenity within the residential elements of the development is, therefore, considered to be good.

6.6.15 The majority of the units would be dual aspect with some within the tower which would be east or west facing and single aspect. There would be no single aspect north facing units.

- 6.6.16 All the dwellings will meet the Lifetime Homes standards; and all will be easily adaptable for wheelchair users. Conditions can be imposed to ensure that the proposal meets Part M4 (2) 'accessible and adaptable dwellings' of the Building Regulations 2015 and that 10% meet Part M4 (3) 'wheelchair user dwellings' in accordance with Local Plan 2013 Policy SP2 and the London Plan Policy 3.8.
- 6.6.17 A noise report as been provided which demonstrates that the noise levels at the dwellings would not exceed acceptable levels. Overall the proposal provides reasonable living conditions for prospective occupiers in accordance with London Plan Policy 3.5 and Local Plan Policy SP2.
- 6.6.18 An assessment of the wind environment within roof terraces and balconies of the proposal has been conducted. The results of the assessment shows that these are largely within the comfort criteria for sitting and standing especially on roof terraces 1 and 3 with some increased windiness in terrace 2. The results of the wind assessment for safety indicate that wind conditions remain safe for all the roof terraces and balconies. Therefore the proposed amenity spaces are considered to be of acceptable quality to comply with the above policies.

Child playspace

- 6.6.19 Policy 3.6 of the London Plan seeks to ensure that development proposals include suitable provision for play and recreation. Local Plan Policy SP2 requires residential development proposals to adopt the GLA Child Play Space Standards 2009, where London Plan Policy 3.6 and Local Plan Policy SP13 underline the need to make provision for children's informal or formal play space. The provision of play space should integrate with the public realm without compromising the amenity needs/enjoyment of other residents and encourage children to play.
- 6.6.20 The Mayor's Play and Recreation SPG sets a benchmark of 10 sq.m of useable child playspace to be provided per child, with under 5s child play space provided on-site as a minimum. Using the methodology in the Mayor's SPG it is estimated that the child yield will be 20 requiring 200 sq.m of play space. The yield would include 11 under 5s requiring 120 sq.m. of playspace. The proposal would provide two areas for formal play and two areas of informal play suitable for under 5s on the roof terraces and in the courtyard totalling 165 sq.m. There would be two areas for formal play and two areas of informal play suitable for 5- 11s on the roof terraces and in the courtyard totalling 136 sq.m.
- 6.6.21 Based on the housing and tenure mix, the provision of play space would exceed the London Plan requirements.
- 6.6.22 Overall, the quality of residential accommodation of the new development is considered to be acceptable for prospective occupants in meeting the policy

aims and objectives of Local Plan Policies SP2 and SP13, London Plan Policies 3.5 and 3.6 and the Mayor's Housing Supplementary Planning Guidance.

6.7 Transport

- 6.7.1 SP4 Sets out Haringey's aspiration for an environmentally Sustainable and elaborates on the Council's overall strategy for managing growth in Haringey with respect to Transport which includes "encourage development to use sustainable modes of travel by minimising car parking provision in new development; to increase cycle parking and encourage modal shift through travel planning and designing public realm to support non-car use.
- 6.7.2 Local Plan (2013) Policy SP7 Transport states that the Council aims to tackle climate change, improve local place shaping and public realm, and environmental and transport quality and safety by promoting public transport, walking and cycling and seeking to locate major trip generating developments in locations with good access to public transport.
- 6.7.3 Saved UDP Policy M9, Car-Free Residential developments: sets out that proposals for new development without the provision of car parking will be permitted in locations where:
- a) there are alternative and accessible means of transport available;
 - b) public accessibility is good; and
 - c) a controlled parking zone exists or will be provided prior to occupation of the development.

Background

- 6.7.4 The Council's Transportation Team has been consulted and advised that the site has the highest accessibility to public transport possible (PTAL 6a) with 11 bus routes (46, 349, 243, 318, 476, 149, 76, W4, 41, 259, and 279) operating in close proximity to the site. The frequencies of buses on the routes serving the site range from 4 to 12 vehicles per hour, with an average frequency of 92 vehicles per hour. Seven Sisters Rail and LU Stations are approximately 116m from the site, which 1.5 minutes walk time. South Tottenham Rail Station is approx. 310 m from the site and can be reached by walking in 3.8 minutes.
- 6.7.5 They note that there are planned public transport improvements, which will further enhance the public transport accessibility of the site. Seven Sisters Road Station is part of the proposed Crossrail 2 project, which is currently under development Other planned transport improvements in the locality include Cycle Superhighway 1, which is aimed at improving the cycle link between Tottenham and Old Street. The Cycle Superhighway 1 (CS1) project has recently been completed. In the vicinity of the site CS1 consists of northbound and southbound

segregated cycle lanes along Tottenham High Road, to the east of the development site.

- 6.7.6 The development site is at the junction of Seven Sisters Road and Tottenham High Road, which are both part of the TLRN (Transport for London Road Network). Seven Sisters Road forms part of the A503 route, whilst Tottenham High Road forms part of the A10 route.
- 6.7.7 Stonebridge Road to the Southwest of the site is a private residential road that provides vehicle access to the existing car park at Apex House and serves as access to the adjoining residential properties; Stonebridge Road is owned by the Council and managed by Homes for Haringey.
- 6.7.8 The adjoining roads are subject to a variety of parking restrictions. Tottenham High Road and Seven Sisters Road are TLRN and therefore are subject to Red Route restrictions. The surrounding LB Haringey adopted highways are included in a controlled parking zone (CPZ), with parking restrictions operating Monday to Saturday 8:30 AM to 6:30 PM. Stonebridge Road is under the private parking regime, which allows parking for residents only.
- 6.7.9 In transport terms the proposal involves provision of servicing for the market; provision of up to 16 on-street disabled car parking spaces; 261 cycle parking spaces; and public realm enhancements. The trip generation analysis presented in the Transport Assessment suggests that the proposal will generate fewer vehicle trips than the existing development and the conclusion follows that the proposal will not create any detrimental traffic impacts on the adjoining highway network. Transport officers concur with this conclusion.

Trip Generation

- 6.7.10 The trip generation analysis shows that the proposal will create an increase in trips by public transport (Bus, Rail and Underground). The net trip generation for public transport forecasted some 414 two-way trips over a 12 hour period (07:00 to 19:00). This translates into 71 two-way public transport trips in the AM peak and 49 two-way public transport trips in the PM peak. The breakdown per public transport mode is 40, 9 and 22 underground, rail and bus trips respectively, during the AM (08:00-09:00) peak; and 28, 6 and 15 underground, rail and bus trips respectively, during the PM (17:00-18:00) peak. The additional public transport trips can be accommodated comfortably within the current public transport capacity and are therefore deemed to have no material impact.
- 6.7.11 As the commercial space is proposed to be used for the market which will be transferred only some 67 metres from the existing location, we have considered that, as these trips already exist on the local transport network and the relocation of the market will only be some 67 metres; there is no need for these trips to be assessed as part of the cumulative impact of the development on the highways

network, with the exception of servicing, which is assessed below, and will be secured by way of a servicing and delivery plan. If the market does not relocate to this site the delivery and servicing of the alternative uses can also be accommodated and would be similar to the existing situation and would also be acceptable.

- 6.7.12 The development is expected to generate 16 service/delivery trips per day for the market element. The TA suggests that vehicles servicing the market would be vans of 6m or less, and 7.5t lorries. The service trip generation of the site is not expected to create any significant effects during peak traffic periods. There is some concern that during servicing there may be some temporary congestion on Stonebridge Road however this will be temporary in nature.
- 6.7.13 The TA predicts a net increase in pedestrian trips during the AM and PM peak traffic periods. An additional 414 pedestrian two-way trips over a 12 hour period (07:00 – 19:00) is predicted. The increased pedestrian trips during the AM and PM peaks are small and can be accommodated within the existing pedestrian provisions.
- 6.7.14 A small net increase in cycle movement is predicted – 2 and 2 two-way cycle trips during the AM and PM peak traffic periods respectively. Such a small increase would have little impact on the adjoining road network.
- 6.7.15 The approach to parking under the proposal is consistent with the Policies set out above and London Plan 6.13 by encouraging minimum car parking provision in areas of excellent transport accessibility, in order to promote the use of non-car modes of travel. The provision of nil on-site car parking is therefore considered to be acceptable given the high public transport accessibility level of the site.
- 6.7.16 However, it is a policy requirement that the needs of disabled people are taken into account and adequate disabled parking is provided to ensure that developments are accessible for all. Parking for disabled people should generally be provided off-street, however, where constraints dictate otherwise, disabled car parking can be provided on-street, providing that there is spare on-street parking capacity and that the disabled car parking spaces can be located within a reasonable walking distance of the entrance to the development.
- 6.7.17 The applicant has indicated (at Appendix 3 of the Transport Statement) the locations where disabled car parking spaces will be provided in the adjoining street – Stonebridge Road. A survey of parking in Stonebridge Road was undertaken and found that the maximum consumption of parking was 77 out of 127 permit parking spaces. This suggests that Stonebridge Road has spare capacity of 50 parking spaces. With the removal of six (6) car parking spaces to provide for servicing, the spare capacity is reduced to 44 spaces. The applicant proposes to allocate up to 16 of the existing permit parking spaces to disabled parking for the proposed development, reducing the spare capacity to 28 spaces

during periods of maximum usage. The disabled car parking spaces can be accommodated within the capacity of Stonebridge Road.

6.7.18 As the proposed disabled parking spaces in Stonebridge Road fall outside of the demise of the development site, the applicant is required to produce evidence of an agreement with the owner of Stonebridge Road, permitting residents of the development to park in Stonebridge Road which must be submitted for inspection and approval by the Transport Officer, prior to the occupation of the development. This will be secured in the S106 agreement.

6.7.19 The applicant proposes to introduce a lower number of disabled car parking spaces in Stonebridge Road initially, increasing the number of spaces in response to the growth in demand, up to the agreed maximum of 16 spaces. The applicant has agreed to produce a Parking Management Plan (PMP) which will keep the demand for disabled parking spaces under review, in order to ensure that sufficient spaces are made available for residents of the development. Consideration must be given to the location of the disabled parking spaces in terms of their proximity to the principal entrance.

Access and Servicing Arrangements

6.7.20 The proposal includes an off-street service yard that takes access via Stonebridge Road, which serves the residential and commercial aspect of the development; including accommodating refuse collection vehicles, domestic deliveries and deliveries to the proposed relocated Market. The Transport Assessment includes swept path diagrams which demonstrate that vans servicing accessing the service yard can comfortably manoeuvre and exit in a forward direction, vehicle swept path analysis have also been provided which demonstrates that refuse vehicles can access the proposed service area to collect refuse, the Council's waste management section will require all the bins (45 Euro Bins) to be within 10 metres of the refuse truck.

6.7.21 Additional provision for servicing, primarily for the market element of the proposal, consists of on-street loading bays in Stonebridge Road and Seven Sisters Road. The TA suggests that the loading bay design has regard to TfL's bus stop guidance i.e. 15m clear of the Seven Sisters/ Tottenham High Road junction and 13m clear of the nearby bus cage, and is therefore acceptable. However, the Council takes a different view. The applicant has consulted TfL in relation to the location of the loading bay and the proximity of the existing bus stop, TfL are happy for the loading bay to be included as part of the proposed servicing arrangements.

6.7.22 The proposed loading bay in Stonebridge Road is also provided on the footway, the details of the loading bay in Stonebridge Road will require the approval of the owners of Stonebridge Road. The provision of the loading bay will also require

TfL's approval as the existing Red Route traffic management order in Stonebridge Road will have to be amended.

6.7.23 The removal of three existing on-street parking spaces in Stonebridge Road to facilitate the loading bay will not significantly reduce the overall parking capacity in Stonebridge Road but this will require the approval of the owners of the road (Housing/ Homes for Haringey).

Pedestrian Access

6.7.24 The development site sits on two 'Red Routes' and is abutted by relatively generous footways widths on its 'Red Route' frontages, as is typical in an urban location. The site has good pedestrian connections to local transport provisions and amenities.

6.7.25 Pedestrian access is via three cores which take access from the footway in Tottenham High Road, Seven Sisters Road and Stonebridge Road. It should be noted that the proposed building is set back on its Seven Sisters Road, Tottenham High Road and Stonebridge Road frontages, effectively creating wider footways. The proposed widening will improve the pedestrian environment and is viewed positively by the Council; providing that the additional space created by the set back of the building will be publicly accessible.

Cycle Access and Parking

6.7.26 As set out above, there are planned strategic cycle improvements (Cycle Superhighway 1) adjacent to the site, which are aimed at improving north-south cycle connections between Tottenham and Old Street. CS1 cycle lane runs along the Tottenham High Road frontage of the development site. The CS1 proposal entails the creation of a 3 to 3.2m segregated two-way cycle lane on the Tottenham High Road frontage of the development site. Transport officers observe that the footway width on the Tottenham High Road frontage of the site is slightly narrower than the footway adjacent to Seacole Court.

6.7.27 The TA states that a total of 265 cycle parking spaces are provided on the ground floor and mezzanine level for the proposed uses. The planning application drawings indicate 135 cycle parking spaces on ground floor and 135 cycle parking spaces on the mezzanine floor. 265 cycle parking spaces satisfy the recommendations set out in the London Plan (FALP, 2015, Table 6.3).

Accident Analysis

6.7.28 The TA includes an analysis of accidents in the area over a 36 month period ending in November 2014. The data obtained from TfL shows that 99 accidents occurred during this 36 months period. The most common location for accidents were observed to be the junction of Seven Sisters Road with Tottenham High Road and Tottenham High Road/ Broad Lane junction. However, none of the

accidents within the area assessed were fatal accidents. The nature of the accidents observed during the 36 months period suggests that no specific mitigation aimed at reducing accidents is required. However, it should be noted that as part of the proposed CS1 scheme, the pedestrian crossing connecting Apex House to the Seven Sisters Road northern footway via the traffic island will be widened, which is expected to improve highway safety in the vicinity of the site.

Travel Plan

6.7.29 The proposal is accompanied by a Framework Travel Plan (FTP), which was assessed by TfL's ATTrBute system and was found to have failed. Nonetheless, the aims, objectives and indicative measures outlined in the FTP are broadly acceptable. The applicant is required to produce and submit a Full Travel Plan for the approval of the Council. The Travel Plan must be in place prior to the operation of the development.

Transport Conclusion

6.7.30 The development is in an area that is highly accessible by non-car modes and is therefore suited for a car-free development as proposed. The development is deemed consistent with London Plan Policy 6.13, SP7 and saved UDP Policy M10 which promotes car-free developments in areas of high public transport accessibility. The Council seeks a car-free s.106 obligation which removes residents' eligibility to obtain permits to park in the adjoining CPZ bays.

6.7.31 The principle of providing on-street disabled car parking spaces are accepted, providing the disabled parking spaces are within a reasonable walking distances from the entrance of the development. The applicant is required to produce evidence of an agreement with the owner of Stonebridge Road (Homes for Haringey) with respect to the provision of on-street disabled parking spaces.

6.7.32 The development is acceptable providing that the transport issues highlighted in this report are addressed and subject to the planning conditions and obligations to secure a Control Parking Zone, Delivery and Service Plan, Waste Management Plan, cycle parking, parking management plan, construction management plan and highways works through a S.278 agreement.

6.8 Daylight, Sunlight, Microclimate, Impact on neighbouring amenity

6.8.1 Saved UDP Policy UD3 states that development proposals are required to demonstrate that there is no significant adverse impact on residential amenity or other surrounding uses in terms of loss of daylight or sunlight, privacy, overlooking. Similarly London Plan Policy 7.6 requires buildings and structures should not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy.

6.8.2 In respect of tall buildings London Plan Policy 7.7 states that tall buildings should not affect their surroundings adversely in terms of microclimate, wind turbulence, overshadowing, noise, reflected glare, aviation, navigation and telecommunication interference. Emerging DM Policy DM6 states that proposals for tall buildings should consider the impact on ecology and microclimate. Tall buildings within close proximity to each other should avoid a canyon effect and consider the cumulative climatic impact of the buildings.

6.8.3 The nearest existing residential properties that would be most affected by the siting and scale of the proposed development are:

- Flats 1 – 8 Seacole Court
- Evens 206 – 212 High Road
- Page Green Terrace Evens 184- 200 High Road
- Odds 687 – 719 Seven Sisters Road
- Odds 778 – 796 Seven Sisters Road
- Evens 42 to 74 Stonebridge Road
- Odds 165 – 197 High Road
- 1 – 30 Suffield Road
- 2 to 54 Westerfield Road

Daylight/Sunlight

6.8.4 Significant concerns have been raised during the consultation from neighbouring properties in respect of the impact on the proposed building on surrounding daylight and sunlight. As part of its Environmental Statement the applicant has surveyed 358 windows and 217 rooms within 30 residential properties surrounding the site. This assesses the impact on daylight through a measure known as “Vertical Sky Component” (VSC) and ‘No Sky-Line’ (NSL).

6.8.5 VSC is a quantified measurement of the amount of skylight falling on a vertical wall or window. This is the ratio of the direct sky luminance falling on a vertical wall at the reference point for the simultaneous horizontal luminance under an unobstructed sky. The Commission International de l’Eclairage (CIE) ‘standard’ overcast sky is used, the ratio is then expressed as a percentage. The maximum value achievable is approximately 40% for a completely unobstructed vertical wall. VSC may be calculated by using the sky light indicator or Waldram Diagram.

6.8.6 The NSL method is a measure of the distribution of daylight at the ‘working plane’ within a room. In residential properties, the ‘working plane’ means a horizontal ‘desktop’ plane of 0.85 metres (m) in height. The NSL divides those areas of working plane in a room which receive direct sky light through the windows from those areas of the working plane which cannot. If a significant area of the working plane lies beyond the NSL (i.e. it receives no direct sky light) then the

distribution of daylight in the room would be poor and supplementary electric lighting may be required. The likely impact of the daylighting distribution to the existing residential properties surrounding the Site is established by plotting the NSL in each of the main rooms. For residential properties living rooms, dining rooms and kitchens are assessed of primary concern. Bedrooms are also analysed, although due to their primary use (for resting and sleeping), bedrooms are deemed less important in terms of the amount of daylight received.

6.8.7 With regard to VSC The BRE guidelines state that:

“if the VSC, with the development in place, is both less than 27% and less than 0.8 times its former value, occupants of the existing building will notice the reduction in the amount of skylight. The area lit by the window may appear more gloomy and electric lighting will be needed more of the time”.

6.8.8 With regard to NSL the BRE Guidelines set out the following:

A room may be adversely affected if the daylight distribution (NSL) is reduced beyond 0.8 times its existing area.

6.8.9 Levels of sunlight are measured through an assessment of Annual Probable Sunlight Hours (APSH). With regard to existing surrounding receptors, the BRE Guidelines provide that *a window may be adversely affected if a point at the centre of the window receives for the whole year, less than 25% of the APSH, including at least 5% of the APSH during the winter months (21st September to 21st March) and less than 0.8 times its former sunlight hours during either period, and if there is a reduction in total APSH which is greater than 4%.*

6.8.10 Out of the 358 windows assessed, 318 (89%) have a baseline VSC equal to or greater than 27% whereas 212 (98%) out of the 217 rooms assessed have a daylight distribution to at least 80% of the total room area. With regard to sunlight out of the 97 rooms assessed, 914 (94%) meet the BRE guidelines for sunlight in the baseline.

6.8.11 After the development is constructed out of the total 358 windows assessed 277 (77%) meet the BRE criteria for VSC whereas 188 (86%) of the 217 rooms assessed meet the criteria for NSL. As such 81 windows are adversely affected in terms of VSC and 29 rooms in terms of NSL.

6.8.12 In terms of the significance of the change in daylight 7 properties will be affected to a negligible extent and 22 properties will experience a minor adverse effect. Several properties included in the proposals for demolition for the Wards Corner Development would be affected to a moderate adverse level.

6.8.13 In terms of sunlight 27 properties will be affected to a negligible extent and 2 properties will experience a minor adverse effect. These are both located in Page Green Terrace to the east of the site, 1 property will have no alteration to

the level of winter APSH and the other will retain 4% winter APSH against a BRE recommended 5% and 31% total APSH against a BRE recommended 25%.

6.8.14 It is worth noting that the BRE standards are not policy but are universally recognised guidance which is used in order to determine the acceptability of levels of daylight/sunlight within new development. Paragraph 2.3.29 of the GLA Housing SPD supports this view as it acknowledges that natural light can be restricted in densely developed parts of the city.

6.8.15 Overall, given the location of the site in an urban area, the proposal is not considered to have a significant impact on sunlight or daylight and as such is in line with planning policy.

Overshadowing

6.8.16 The Environmental Assessment provides an indication of the swept path of the shadow created by the development on surrounding properties. The method for assessing sun on the ground is the 'sun-on-ground indicator'. The BRE Guidelines suggest that the Spring Equinox (March 21st) is a suitable date for the assessment. Using specialist software, the path of the sun is tracked to determine where the sun would reach the ground and where it would not. This assessment reviews the total percentage of an area that receives at least two hours of direct sunlight on the March 21st.

6.8.17 The BRE guidelines recommend that at least half of a garden or amenity area should receive at least 2 hours of sunlight on March 21st or the area which receives 2 hours of direct sunlight should not be reduced to less than 0.8 times its former value (ie no more than a 20% reduction).

6.8.18 Whilst the sweep of the tower's shadow extends farther than the existing building the environmental impact assessment submitted concludes that the only gardens materially affected by the proposal are those serving 1 to 18 Seacole Court. The Baseline Conditions (% of Area Receiving two hours of sun on 21st March) is 58.4% - 63.3%. After the development this would be 50% - 63.1%. The Percentage Alteration between the Baseline and Operational Conditions is 0.3% - 15.9% and the effect is therefore Negligible. 100% of existing amenity spaces assessed achieve at least two hours of sunlight to at least 50% of the area on 21st March, which according to the BRE Guidelines would provide an adequate level of amenity in the context of a suburban environment. This is therefore considered acceptable, and in line with policy, in an urban environment such as this site.

Solar glare

6.8.19 In regards to solar glare the facade of the proposed development does not comprise high levels of reflective materials therefore is considered unlikely to result in adverse instances of reflective solar glare.

Wind mitigation

6.8.20 As part of its Environmental Statement the applicant has carried out Computation Fluid Dynamics (CFD) modelling to determine the effect of the development on the local pedestrian wind environment and on the surrounding areas as compared to the existing baseline conditions. The assessment also compares the effect of the development in conjunction with relevant consented developments as part of the cumulative impacts. The methodology adopted for the assessment combines the use of CFD to predict air flow patterns and wind velocities around the Site, the use of wind data from the nearest suitable meteorological station and the recommended comfort and safety standards (the Lawson Criteria). The CFD modelling was not considered an accurate enough assessment of the impact on the proposal on the wind environment so a Boundary Layer Wind Tunnel (BLWT) Study was also carried out.

6.8.21 The BLWT study combines wind speed-up factors at key areas in and around the site with long-term wind frequency statistics to determine the probability of local wind speeds exceeding comfort and safety thresholds for a range of common pedestrian activities. The following key areas were assessed:

- The Pedestrian access routes
- Entrances
- Recreational areas, including
 - Elevated terraces
 - Balconies

The wind speed-ups have been measured in the model-scale boundary layer wind tunnel testing for a full range of wind directions. The wind statistics were transposed from the nearest suitable weather centre to apply directly at the site. The threshold wind speeds are based on the industry standard Lawson criteria. The model scale of 1:300 is considered large enough to allow a good representation of the details that are likely to affect the local and overall wind flows at full scale. In addition, this scale enables a good simulation of the turbulence properties of the wind to be achieved.

6.8.22 The Lawson Criteria (Bristol Method) have been applied to determine the acceptability of wind conditions for pedestrian safety and comfort in the Baseline and Proposed scenarios. The Lawson Criteria provide wind speed and frequency ranges for pedestrian comfort and safety. It stipulates that for the comfort and safety assessment of wind effects, it is not only the velocity of wind that is considered but also the frequency of occurrence of these velocities. The frequency of occurrences is used as an indicator of the likely duration of certain wind speeds. The Bristol Method provides criteria of acceptability to maintain

pedestrian comfort for different activities and relates frequency of occurrence to the hourly average wind speed ranges of the Beaufort scale. Details of the comfort criteria are set out in the table below and are based on the exceedance of the threshold wind speeds, based on the mean hourly value and on the gust equivalent mean value, occurring less than 5% of the time. The value of 5% has been established as giving a reasonable allowance for extreme and relatively infrequent winds that are tolerable within each category.

Threshold Wind Speed	Comfort Rating / Activity		Examples
4 m/s	C4	Long-term standing / sitting	Reading a newspaper and eating and drinking
6 m/s	C3	Short-term standing / sitting	Appropriate for bus stops, window shopping and building entrances
8 m/s	C2	Leisure thoroughfare / strolling	General areas of walking and sightseeing
10 m/s	C1	Pedestrian transit / thoroughfare (A-B)	Local areas around tall buildings where people are not likely to linger
> 10 m/s	C0	Uncomfortable for all uses	Uncomfortable for all pedestrian activities

6.8.23 The Lawson method also identifies a safety criterion to identify those areas where someone could find walking difficult, or even stumble and fall. This criterion is used to assess wind conditions under periods of strong winds which are infrequent but which would present a risk to some pedestrians. The safety criteria are based on the exceedance of threshold wind speeds, against both the mean-hourly value and on the gust equivalent mean value, occurring once per annum. A wind speed greater than 15 metres-per-second occurring once a year is classified as unsuitable for general public and represents a wind speed with the potential to destabilise the less able members of the public such as the elderly, cyclists and children. Able-bodied users are those determined to experience distress when the wind speed exceeds 20 metres-per-second once per year.

6.8.24 The BLWT study assessed the development within the existing surrounds and future surrounds. Within the existing surrounds the study concludes that with the introduction of the proposed development, wind conditions in and around the site remain suitable, in terms of pedestrian safety, for intended use. Wind conditions at all ground and elevated levels in and around the proposed development are suitable, in terms of pedestrian comfort, for the intended uses.

- 6.8.25 With the introduction of the future consented building at Ward's Corner, conditions are expected to be largely similar to those of the existing surrounds. Due to the narrowing of the gap between the proposed development and Ward's Corner and localised acceleration around the curved façade, a slight increase in the funnelling effect here creates windier conditions. Windier conditions would prevail at the entrances on the south-east corner of Ward's Corner. While these areas are suitable for thoroughfares, additional shelter would be required for entrances. The proposal therefore requires the introduction of localised mitigation (3m x 1m solid screen) near the south-eastern corner of Ward's entrances to ensure that these areas are suitable for intended uses, in terms of pedestrian comfort as well as safety.
- 6.8.26 The Council commissioned an independent review of the wind assessment by RWDI a specialist wind consultancy using their expert judgment and experience of other schemes of similar massing and context. The conclusion of the review is that the methodology used is considered appropriate to assess the wind environment around the proposed development. They note that the results presented predicted wind conditions which are largely acceptable for the intended pedestrian use. Further details are set out below.
- 6.8.27 They do however advise that conditions at ground level depend upon the existing large trees along The High Road and most significantly around the northern corner of the proposed development. They advise that should these trees be removed or die in the future then it would be expected that conditions will become windier than those presented in the assessment. The applicant has responded advising that as the avenue of trees along the High Road run from north to south they are unlikely to have a significant impact upon prevailing winds, which blow from the southwest and drive the windier conditions at the northern corner of the proposed development. The trees referred to will be protected by a condition of the application and a TPO in future so their removal is unlikely and would require replacement planting so officers are satisfied with this response.
- 6.8.28 RWDI also note that with the proposed development in place, the northern corner of the building is predicted to experience 'Pedestrian Transit' conditions. Although this is an acceptable result and not expected to present safety conditions, it should be noted that conditions around this building corner will feel relatively windy at times. Given that this complies with the Lawson criteria this level of windiness is considered acceptable by officers. □
- 6.8.29 RWDI draw attention to the fact that at terrace and balcony level a number of locations are predicted 'Standing and short term sitting' which will limit their value as an amenity space. The applicant has responded advising that these locations are not to be used as restaurants/outdoor café-style seating locations. The vast majority of balcony locations are suitable for prolonged periods of outdoor seating. While the balconies towards the bottom of the western façade of the

tower do not meet the criteria for prolonged periods of outdoor seating / standing they do meet the relevant criteria 94% of the time. Officers consider that given there is a good level of other amenity space available to residents within the site it is not a significant concern that at times some balconies will not be suitable for long term outdoor seating and a good level of amenity will be provided to future residents.

6.8.30 RWDI note that the required wind mitigation is offsite. As set out above the applicant has submitted an application for a non-material amendment to the planning permission at Wards corner. This seeks permission for the required 3m x 1m solid screen.

6.8.31 The independent review considers therefore that officers can be satisfied that the wind environment created by the proposed development and future development at Wards Corner is suitable for intended use, both in terms of comfort and safety. The proposal is acceptable in this respect.

Light pollution

6.8.32 The proposed development is comprised of predominantly residential accommodation, therefore light spill from commercial lighting and sky glow from façade lighting is not anticipated to be significant and, therefore, it is unlikely to have an adverse effect on neighbouring properties. A condition to ensure considered use of building lighting would nevertheless be appropriate for a building of this size and prominence.

Privacy

6.8.33 Concerns have been raised in relation to loss of privacy and overlooking from the proposed development. The nearest residential properties are at Seacole Court to the south of the site and on Stonebridge Road to the west. The design and access statement seeks to recognise the scope for future development on the Seacole Court site – in line with the emerging site allocation. There would accordingly be no windows in the south elevation of the tower up to 7th floor level facing Seacole Court and the 7 storey building would be some 24 metres from the rear elevation of Seacole Court. Four secondary windows in the north gable of Seacole Court face towards this elevation. These will experience a dramatic change in outlook. They are nevertheless considered to comprise secondary windows to rooms that having regard to the long term policy aspirations for the site – and evidence of scope for complementary re-development should not prevent the development proceeding. These windows will not experience any significant overlooking. Given the distance between the nearest window on the proposed building and the other windows in the main east and west elevations of Seacole Court the proposal is not considered to result in a loss of privacy to the flats or to unacceptably compromise

enjoyment of the shared garden area of this property. The flats on Stonebridge Road sit with their main elevations perpendicular to the site so the proposal would not afford significant views into these properties. The amenity spaces for these properties are communal where day to day interaction is anticipated (and privacy to individuals does not exist currently).

- 6.8.34 On Seven Sisters Road there are residential properties at first and second floor level in the existing buildings, including those to be re-developed as part of one of the Wards Corner development proposals. The 7 storey block would be some 21 metres from these properties across Sevens Sisters Road. Given the existing office use of the site and whilst noting that the proposals will introduce a significant number of additional residential windows onto the building face the separation distance between the proposal and existing (and future) residential units opposite is considered to retain acceptable levels of privacy for existing and future residents of this busy urban street. The proposed tower would face north along Tottenham High Road so would be at an oblique angle to the neighbouring properties located to the north and a significant distance from neighbouring windows and gardens so would not result in a significant loss of privacy to the north.
- 6.8.35 To the east of the site is Page Green Terrace which consists of terraced town houses converted to flats. The proposed tower would be over 40 metres from the front elevation of these properties which sit across the high road, an area of landscaping and the access lane to the front of these properties. The front elevations of these properties do not currently have a high level of privacy as they face onto a busy thoroughfare. Given their current level of amenity and the separation distance the proposal is not considered to result in levels of intervisibility between existing and future residents that would be inconsistent with the sites location at a major transport junction close to the edge of an established town centre within Tottenham. .
- 6.8.36 Concerns have been raised the tower would overlook surrounding garden areas. The buildings' height means that upper floors of the building will inevitably enjoy panoramic views of this part of the Borough - and beyond. These elevated viewpoints across the Borough from homes exist in a range of locations across London and Haringey and whilst providing potential for overlooking across large areas, have nevertheless become commonplace in both inner and outer London. The separation distances from immediately surrounding garden areas is nevertheless considered sufficient to prevent a significant perceived loss of privacy from occupants surrounding the development.

Overall conclusion on impact on amenity

- 6.8.37 London Plan and Local planning policies set out that there should be no significant adverse amenity impact from new development. This is emphasised

particularly in cases where densities are above the London Plan density matrix. The proposed development will undoubtedly change the relationship between the buildings on the site and existing surrounding properties. The scale and height of the building will have an impact upon outlook from these surrounding homes and will be an obvious change from the existing building on the site. Surrounding residents will accordingly experience both actual and perceived changes in their amenity as a result of the development. Nevertheless, taking account of the technical studies submitted in the environmental statement and the urban setting of the site and its current condition the proposal is not considered to result in an unacceptable impact on local amenity and as such is considered to satisfy planning policy.

6.9 Trees

- 6.9.1 UDP (2006) Policy OS17 states that the Council will seek to protect and improve the contribution of trees, tree masses and spines to local landscape character by ensuring that, when unprotected trees are affected by development, a programme of tree replanting and replacement of at least equal amenity and ecological value and extent is approved by the Council.
- 6.9.2 The applicant has provided an Arboricultural Report which surveyed a total of twelve trees and tree groups. The most prominent trees located adjacent to Apex House comprise a mature poplar (*Populus nigra*) in the parking area and four mature London planes (*Platanus acerifolia*) located adjacent to the eastern site boundary. These large London Plane trees provide significant amenity value to the site and contribute to the character of the local area. The mature poplar in the parking area, forms a less prominent feature in the wider landscape. The Arboricultural Report notes that a number of small trees and woody shrubs have been recommended for removal if they pose a constraint to development and advises that their loss should not be detrimental to wider landscape or have an adverse impact on local visual amenity.
- 6.9.3 The Council's Tree & Nature Conservation Manager has been consulted and advises that the proposed layout would involve intrusions into the recommended root protection areas (RPAs) of The London Plane Tree (T5, T6 and T10). He notes that London plane trees are tolerant to some root disturbance, but in the case of T6 and T10, the likely loss of roots will be significant and could have a detrimental impact on both trees. T6 and T10 would also require extensive pruning works to allow for access for the construction works and robust protection during construction. He notes that The Arboricultural survey has identified that T5 has a fungal bracket of the *Ganoderma applanatum* decay fungi and advises that in advanced stages of decay, this fungus can result in stem or root plate failure. As this is a large tree with a high risk target zone (immediately adjacent to the public highway), further investigation using decay detection equipment must be carried as soon as possible, to determine whether the tree may be retained. If extensive decay is identified, the tree must be removed.

6.9.4 He advises that the only significant tree specified for removal is T2, a mature Poplar (*Populus nigra*), found to be in a fair condition and categorised as a B tree. He notes that Poplars have a limited lifespan and estimates this tree to have 20-40 years. It is clearly visible so would therefore likely merit a TPO. However, its removal could be justified, if 5 replacement trees of a large nursery size (18-20cm trunk circumference) were planted to mitigate its loss. This could be done outside of the site on the public highway.

6.9.5 Therefore overall it is considered that subject to conditions to secure the an Arboricultural Impact Assessment, tree protection plan, Arboricultural method statement and 5 replacement trees, that the proposal would protect and improve the contribution of trees to local landscape character in accordance with above policy. The species and location of the replacement trees will be agreed with the LPA and planted during the next planning season after the completion of the development.

6.10 Flooding and drainage

6.10.1 London Plan (2011) Policy 5.13 'Sustainable drainage' and Local Plan (2013) Policy SP5 'Water Management and Flooding' require developments to utilise sustainable urban drainage systems (SUDS) unless there are practical reasons for not doing so, and aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible in line with the following drainage hierarchy:

- 1 store rainwater for later use
- 2 use infiltration techniques, such as porous surfaces in non-clay areas
- 3 attenuate rainwater in ponds or open water features for gradual release
- 4 attenuate rainwater by storing in tanks or sealed water features for gradual release
- 5 discharge rainwater direct to a watercourse
- 6 discharge rainwater to a surface water sewer/drain
- 7 discharge rainwater to the combined sewer.

6.10.2 They also require drainage to be designed and implemented in ways that deliver other policy objectives, including water use efficiency and quality, biodiversity, amenity and recreation. Further guidance on implementing Policy 5.13 is provided in the Major's Sustainable Design and Construction SPG (2014) including how to design a suitable SuDS scheme for a site. The SPG advises that if Greenfield runoff rates are not proposed, developers will be expected to clearly demonstrate how all opportunities to minimise final site runoff, as close to Greenfield rate as practical, have been taken. This should be done using calculations and drawings appropriate to the scale of the application. On previously developed sites, runoff rates should not be more than three times the

calculated Greenfield rate. The SPG also advises that drainage designs incorporating SuDS measures should include details of how each SuDS feature, and the scheme as a whole, will be managed and maintained throughout its lifetime.

6.10.3 The applicant has provided a drainage strategy which states that the proposal will utilise SUDS and conform to the London Plan hierarchy. The Council's SUDS officer is satisfied with the strategy subject to further details of the management and maintenance plan for the lifetime of the development. This will be secured by condition.

6.10.4 The proposal will therefore provide sustainable drainage and will not increase flood risk in accordance with London Plan (2011) Policy 5.13 'Sustainable drainage' and Local Plan (2013) Policy SP5 'Water Management and Flooding'

6.11 Energy/Sustainability

6.11.1 The NPPF and London Plan Policies 5.1, 5.2, 5.3, 5.7, 5.8, 5.9, 5.10 and 5.11, and Local Plan Policy SP4 sets out the approach to climate change and requires developments to meet the highest standards of sustainable design, including the conservation of energy and water; ensuring designs make the most of natural systems and the conserving and enhancing the natural environment. The London Plan requires all new homes to achieve a 35 per cent carbon reduction target beyond Part L 2013 of the Building Regulations (this is deemed to be broadly equivalent to the 40 per cent target beyond Part L 2010 of the Building Regulations, as specified in Policy 5.2 of the London Plan for 2015).

6.11.2 The applicant's energy statement states that the energy hierarchy set out within the London Plan has been followed for this development to firstly reduce the energy demand by the incorporation of improved insulation and efficient systems before the incorporation of decentralised and renewable technologies. The proposal will incorporate energy efficiency measures, CHP and 4 x 10sq.m of solar panels. It calculates a carbon emission reduction of 29% with an annual shortfall below the 35% London Plan target.

6.11.3 Given the limitations of the site this level of carbon reduction is considered acceptable in this instance and carbon offsetting has been accepted to reach the London Plan target. The Mayor's Sustainable Design and Construction SPG sets out how this is calculated using a nationally recognised price or locally set price; currently £60 per tonne. The overall contribution should be calculated over 30 years which equates to £1,800 per year. The applicant's energy statement shows that the proposal has a shortfall of 23 tonnes therefore, a contribution of £41,400 is sought through a S106.

6.11.4 The development has been designed so that if a heat network in the Upper Lee Valley comes forward it would be possible to connect to the network, if appropriate. The Council's Carbon Management Team has requested further details of the safeguarded connection between the CHP and property boundary, to ensure that the proposal is adequately future proofed and follows Greater London Authority decentralised energy network design guidance provided. This has been secured by a condition.

Overheating

6.11.5 The building has been designed such that demand for cooling will be minimised by shading through balconies and solar control glazing however a risk of overheating remains. The applicant has accordingly undertaken a dynamic thermal modelling study using The Chartered Institution of Building Services Engineers (CIBSE) TM52 'The Limits of Thermal Comfort: Avoiding Overheating in European Buildings 2013' methodology and CIBSE TM49 'Design Summer Years for London' weather files as recommended in the GLA guidance on preparing energy assessments (April 2015) to assess the risk of overheating. The results of the study show that all of the bedrooms modelled will meet the CIBSE criteria for each of the climate scenarios modelled; however, it was noted that none of the living areas meet the CIBSE criteria for any of the climate scenarios. The applicant has reviewed the passive measures suggested and has maximised measures to deal with overheating as much as possible in the context of the scheme design. Further external shading could not be integrated without significant implications on the scheme's design and viability. Mechanical cooling is not proposed as it would increase carbon emissions.

6.11.6 The overheating modelling is a worst case scenario with the assumption that windows will be shut, in line with the noise assessment recommendations. The applicant has re-run the modelling with windows opened to demonstrate that the overheating criteria will be met with windows opened. It is acknowledged that during intense warm periods the occupant may opt to open the window for purge ventilation in areas with noise issues. The applicant carried out further modelling with the windows open throughout the day for the living areas, when higher levels of noise are more tolerable. The results of the bedroom assessment allow for the units to pass with the windows open in the lounge and shut in the bedroom which ensures that the occupants would not experience noise exceedances. This is considered to be a pragmatic response to this issue which is commonly experienced in towers and has also been confirmed to be acceptable by the GLA.

6.11.7 The proposal is therefore considered to be a sustainable design in accordance with the above policies.

6.12 Waste storage

6.12.1 London Plan Policy 5.17 'Waste Capacity', Local Plan Policy SP6 'Waste and Recycling' and Saved UDP Policy UD7 'Waste Storage', require development proposals make adequate provision for waste and recycling storage and collection.

6.12.2 The applicant has provided details of the waste storage arrangements with 27 x 1,110 litre eurobins for waste and 20 x 1,110 litre eurobins for recycling and 4 x 360 litre eurobins for foot waste for the proposed flats. These would be spread across the site in 3 stores at the ground floor of the tower, in the ground floor of the 7 storey block and in a compound close to the service yard. Separate provision would be provided for the market with 4 x 1,110 litre eurobins in the bin compound. The compound will only be accessible to the site management and waste from the tower and market would be transferred to the compound when bins become full and placed in the service yard prior to collection. The store in the 7 storey block would be collected directly from Stonebridge Road serving this block and the proposed townhouses. All of the bins can be place within 10 metres of their collection point in accordance with waste management requirements.

6.12.3 The waste management team require the managing agents to have a cleansing schedule to remove litter from the external areas of the site and cleansing of the waste storage areas. A clear instruction from the managing agents to residents of how and where to dispose of waste responsibly is recommended. A detailed refuse management plan will be secured by S106. The waste management team is satisfied with the proposals for refuse and recycling storage.

6.13 Contaminated land and air quality

Contaminated Land

6.13.1 Saved Policy ENV1 and draft DM Policy DM32 require development proposals on potentially contaminated land to follow a risk management based protocol to ensure contamination is properly addressed and carry out investigations to remove or mitigate any risks to local receptors.

6.13.2 The applicant has assessed the potential for Contamination on the site and the impact of such contamination, The Council's Environmental Health Pollution Officer raises no objections subject to conditions.

Air quality

6.13.3 The London Plan, Policy 7.14 states that new development should: 'minimise increased exposure to existing poor air quality and make provision to address local problems of air quality (particularly within Air Quality Management Areas (AQMA) where development is likely to be used by large numbers of those particularly vulnerable to poor air quality, such as children or older people) such

as by design solutions, buffer zones or steps to promote greater use of sustainable transport modes through travel plans promote sustainable design and construction to reduce emissions from the demolition and construction of buildings; be at least 'air quality neutral' and not lead to further deterioration of existing poor air quality (such as areas designated as Air Quality Management Areas (AQMAs)). The policy seeks to ensure that where provision needs to be made to reduce emissions from a development, this is usually made on-site.

6.13.4 UDP saved policy UD3 sets out that: "The Council will require development proposals to demonstrate that:

- a) there is no significant adverse impact on residential amenity or other surrounding uses in terms of loss of daylight or sunlight, privacy, overlooking, aspect and the avoidance of air, water, light and noise, pollution (including from the contamination of groundwater/water courses or from construction noise) and of fume and smell nuisance;

6.13.5 The application site is adjacent to a main road of air pollution concern, the High Road; a major route into London for which both monitoring and modelling indicates exceedences of the Government's air quality objectives for nitrogen dioxide (NO₂) and PM_{2.5}. The whole of the borough of Haringey is a designated Air Quality Management Area (AQMA and is committed to being a 'Cleaner Air Borough' and working towards improving air quality and to minimise the risk of poor air quality to human health and quality of life for all residents.

6.13.6 An air quality assessment (has been submitted along with as part of the ES to assess the air pollution impact of the proposed developments. The potential effects of the proposed development on local air quality include:

- Emissions from onsite energy generation
- Traffic emissions
- Exposed of future occupants to poor air quality
- Dust and emissions from construction activities

6.13.7 The potentially significant effects that have been considered in this assessment are:

- Construction Phase-
 - Increase in dust and emissions generated by on-site activities on nearby properties.
- Operational Phase-
 - Increase in NO₂ concentrations due to emissions from the energy centre affecting local air quality;
 - Emissions of NO_x and PM₁₀ from the Proposed Development increasing regional emissions;
 - Exposure of future occupants / users of the Proposed Development to poor air quality.

- 6.13.8 The proposed development will not include any car parking provision except for disabled spaces and there will be a reduction in traffic associated with the site compared with the existing land use.
- 6.13.9 The proposed CHP will have a negligible impact on new receptors within the Site and on existing human and ecological receptors. The Development will be air quality neutral overall for buildings and transport as required by the Mayor's SPG on sustainable design and construction although the buildings benchmark is marginally exceeded for NO_x. All proposed residential dwellings will achieve the NO₂ and PM₁₀ objectives and the proposed commercial unit will achieve the hourly NO₂ objective and PM₁₀ objectives so the site is suitable for the land uses proposed.

The proposal therefore complies with the above policy subject to the imposition of conditions covering the following:

- Securing the specification of CHP boilers and flues
- Securing control of emissions plant and machinery to be used at the demolition and construction phases
- Securing the submission of a Dust Management Plan

6.14 Noise

- 6.14.1 The National Planning Policy Framework states that Planning policies and decisions should aim to:
- a. avoid noise from giving rise to significant adverse impacts on health and quality of life as a result of new development
 - b. mitigate and reduce to a minimum other adverse impacts on health and quality of life arising from noise from new development, including through the use of conditions:
 - c. recognise that development will often create some noise and existing businesses wanting to develop in continuance of their business should not have unreasonable restrictions put on them because of changes in nearby land uses since they were established: and
 - d. identify and protect areas of tranquillity which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason.
- 6.14.2 The London Plan 2011 (as amended) sets out planning policies, strategies, and guidance at national and regional level. Policy 7.15 states, development proposals should seek to manage noise by:
- a) avoiding significant adverse noise impacts on health and quality of life as a result of new development;
 - b) mitigating and minimising the existing and potential adverse impacts of noise on, from, within, as a result of, or in the vicinity of new development without placing unreasonable restrictions on development or adding unduly to the costs and administrative burdens of business;

- c) improving and enhancing the acoustic environment and promoting appropriate soundscapes (including Quiet Areas and spaces of relative tranquillity);
- d) separating new noise sensitive development from major noise sources (such as road, rail, air transport and some types of industrial development) through the use of distance, screening or internal layout — in preference to sole reliance on sound insulation;
- e) where it is not possible to achieve separation of noise sensitive development and noise sources, without undue impact on other sustainable development objectives, then any potential adverse effects should be controlled and mitigated through the application of good acoustic design principles;
- f) having particular regard to the impact of aviation noise on noise sensitive development;
- g) promoting new technologies and improved practices to reduce noise at source, and on the transmission path from source to receiver.

6.14.3 UDP saved policy UD3 sets out that: “The Council will require development proposals to demonstrate that:

- a) there is no significant adverse impact on noise (including from the contamination of groundwater/water courses noise);

6.14.4 The Draft DM DPD sets out the following:

Policy DM23 Environmental Protection - Noise and Vibration

- A. The Council will seek to ensure that new noise sensitive development is located away from existing or planned sources of noise pollution. Potentially noisy developments may be refused if it cannot be suitably demonstrated that measures will be implemented to mitigate its impact.
- B. A noise assessment will be required to be submitted if the proposed development is a noise sensitive development, or an activity with the potential to generate noise.

6.14.5 As part of their ES the applicant has provided a noise and vibration report which has assessed both the impact of noise on the scheme for future occupants and the potential impact of noise due to the scheme on the surrounding neighbours. Ambient noise levels due mainly to road traffic from Seven Sisters Road and High Road are considered to be moderate and can be reduced to appropriate indoor noise standards with appropriate specification of windows. Vibration ingress due to the passage of trains has been measured, assessed and found to be negligible therefore vibration mitigation measures are not deemed to be required for this scheme. Re-radiated noise due to vibrations has been assessed to be very low and do not represent a concern for the development.

2011 prohibits the grant of planning permission unless prior to doing so, the Council has taken the 'environmental information' into account. The environmental information is provided in the applicant's Environmental Statement (ES). This demonstrates that subject to mitigations and controls, the development does not give rise to environmental impacts that cannot be satisfactorily addressed so that the principle of the development is not acceptable.

6.17 Equalities

- 6.17.1 In determining this planning application the Council is required to have regard to its obligations under equalities legislation including the obligations under the Equality Act 2010. In carrying out the Council's functions due regard must be had, firstly to the need to eliminate unlawful discrimination, and secondly to the need to promote equality of opportunity and good relations between persons of different equalities groups. Members must have regard to these obligations in taking a decision on this application.
- 6.17.2 The applicant carried out its own Equalities Impact Assessment which concluded the following:
*Through effective consultation and design measures, the proposed development is anticipated to deliver an inclusive scheme that does not negatively affect any priority group and overall, it is assessed that the proposed development will have a **direct, long-term moderate positive impact** on priority groups and the general population living in the Tottenham and Seven Sisters Neighbourhood.*
- 6.17.3 Officers concur with these conclusions and also add the following analysis. The proposals engage primarily with protected characteristics around access and have been designed to contemporary Building Regulations. The proposed development will offer step free access throughout including all entrances to private and affordable, as well as commercial spaces. All floors of the residential accommodation are served by a lift, except for the townhouses. All residential units will be built to Part M4 (2) 'accessible and adaptable dwellings' and 10% will be built to Part M4 (3) 'wheelchair user dwellings' of Building Regulations.
- 6.17.4 The proposed development is likely to provide a range of socio-economic and regeneration outcomes for the Tottenham and Seven Sisters area including the provision of new housing including affordable housing to increase affordability and reduce overcrowding. It will also result in local employment impacts including displacement of existing employment but the generation of construction employment and new employment opportunities to the benefit of all priority groups that experience difficulties in accessing employment. The flexible commercial space will provide options for the relocation of the Wards Corner market, particularly to the benefit of the traders who are predominantly

from the Latin American and BME community. It will also enable wider regeneration of the Tottenham and Seven Sisters Neighbourhood; improve access and movement in the local area; result in public realm improvements and help to reduce crime.

6.18 Conclusion

6.18.1 This is a significant development on a prominent site within Tottenham that has elicited a wide range of responses. Having considered all material planning considerations including the development plan and the environmental information submitted with the application, officers consider that:

- 7 The principle of a landmark tall building is supported by existing and draft policy subject to detailed consideration, in particular the impact on the historic environment, the environmental conditions in the area and other surrounding heritage assets.
- 8 The scale of development will provide a significant number of new homes that will help to meet the Borough and London's wider housing needs in the future. The PRS element will provide greater high quality purpose designed new homes with stable management and security for occupants complementing the existing housing offer in the area. The employment opportunities are considered to support the objectives within the Corporate Plan and Local Plan and will have a positive economic impact in the locality and planning obligation will secure opportunities for local unemployed people to maximise the regeneration benefits of the proposal
- 9 The less than substantial harm caused by the proposals to the nearby heritage assets is outweighed by the townscape benefits of the proposal. The visual and townscape assessments accompanying the application demonstrate that the scale of development proposed within the application will have a significant impact on the appearance of the area locally but in the round will have a positive impact by enhancing the legibility of the area, removing a negative impact on the conservation area and improving the public realm. The design is considered to be high quality which justifies a higher density than recommended in the London Plan guidance.
- 10 There would be 39% affordable units based on habitable rooms which an independent viability assessment has shown to be maximum level of affordable housing that the site can viably support.
- 11 The proposed mix of units is considered appropriate for a high density scheme at an accessible location with a larger number of smaller units but also some larger family units. The units within the tower would be 'tenure blind' and share communal areas. The proposed residential accommodation would be high quality and meet all the

required London Plan Standards and exceed the requirements for child playspace. All the dwellings will meet the Lifetime Homes standards; and all will be easily adaptable for wheelchair users and 10% will be fully wheelchair accessible.

- 12 The development is in a highly accessible area where car-free development is acceptable. On-street disabled car parking spaces are acceptable given they are within a reasonable walking distances. S106 obligations and conditions will secure a Controlled Parking Zone, Delivery and Servicing Plan, Waste Management Plan, cycle parking, parking management plan, construction management plan and necessary highways works through a S278 agreement. The proposal will have a high level of cycle parking and improve the pedestrian environment through the public realm works proposed. The servicing and delivery arrangements are acceptable.
- 13 Having regard to the Environmental Statement submitted with the application, the environmental impacts of the development, including impact upon local amenity in terms of daylight, sunlight, noise, air quality and traffic impacts have been assessed and subject to the conditions proposed within the recommendation are considered to be acceptable. The impact of the tower on wind conditions/microclimate is also capable of being acceptably mitigated by the measures incorporated within the design of the development and the measure proposed for the Wards Corner site.
- 14 The proposed tree removed is considered to be acceptable given the merits of the development and 5 replacement trees will be secured by condition. Conditions will also ensure that the trees to be retained are adequately protected to maintain the landscape character of the area.
- 15 The level of carbon reduction proposed is considered acceptable in this instance and carbon offsetting is required through the S106 to reach the London Plan target. The development could connect to the Upper Lee Valley heat network and safeguarding will be secured by a condition. The building has been designed such that demand for cooling will be minimised. The proposal will provide sustainable drainage and will not increase flood risk and is considered to be a sustainable design.
- 16 The waste management arrangements are considered acceptable and will be controlled through a S106 obligation. Conditions will be imposed to ensure that contaminated land risks are adequately mitigated and that there is no significant impact on air quality, the noise impacts of the proposal are considered acceptable. The proposal will make a positive contribution to the enhancement and protection of biodiversity.
- 17 The proposals are not considered to give rise to any adverse equalities impact upon the protected characteristics of any individual or group.

Planning permission should be granted for the reasons set out above. The details of the decision are set out in the RECOMMENDATION

6.19 CIL

6.19.1 Based on the information given on the plans, the Mayoral CIL charge will be £566,166 (13,872 sqm x £35 X 1.166) and the Haringey CIL charge will be £106,350 (7,090 sqm x 15 x 1.054). 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 construction costs index. An informative will be attached advising the applicant of this charge.

7.0 RECOMMENDATIONS

GRANT PERMISSION subject to conditions

Applicant's drawing No.(s)

1584-G100-P-SITE-001, 1584-G200-P-RF-001, XE-E-001, XE-N-001, XE-NW-001, XE-S-001, XE-SW-001, XE-W-001, P-DEM-001, P-00-001 rev. C, P-MZ-001, P-01-001 rev. C, P-02-001 rev. C, P-03-001 rev. C, P-04-001 rev. C, P-05-001 rev. C, P-06-001 rev. C, P-07-001 rev. C, P-09-001 rev. C, P-18-001 rev. C, P-20-001 rev. C, P-22-001 rev. B, P-B1-001, P-RF-001 rev. C, P-D-00-001 rev. C, P-D-MZ-001, P-D-01-001 rev. C, P-D-02-001 rev. C, P-D-03-001 rev. C, P-D-04-001 rev. C, P-D-05-001 rev. C, P-D-07-001 rev. C, P-D-09-001 rev. C, P-D-18-001 rev. C, P-D-20-001 rev. C, P-D-22-001 rev. C, P-D-B1-001, P-D-00-002 rev. B, P-D-01-002 rev. B, P-D-02-002 rev. B, P-D-03-002 rev. B, P-D-05-002 rev. B, E-E-001, E-N-001 rev. B, E-NW-001 rev. C, E-S-001, E-SW-001, S-AA-BB-001, S-CC-001, S-DD-001 rev. B, S-EE-001, S-FF-001, S-GG-001, S-HH-001, S-JJ-001, S-KK-001, S-LL-001, DET-001, DET-002, DET-003

Subject to the following condition(s)

1. The development hereby authorised must be begun not later than the expiration of 3 years from the date of this permission, failing which the permission shall be of no effect. Reason: This condition is imposed by virtue of the provisions of the Planning & Compulsory Purchase Act 2004 and to prevent the accumulation of unimplemented planning permissions.
2. The development hereby authorised shall be carried out in accordance with the following approved plans and specifications:

1584-G100-P-SITE-001, 1584-G200-P-RF-001, XE-E-001, XE-N-001, XE-NW-001, XE-S-001, XE-SW-001, XE-W-001, P-DEM-001, P-00-001 rev. C, P-MZ-001, P-01-001 rev. C, P-02-001 rev. C, P-03-001 rev. C, P-04-001 rev. C, P-05-001 rev. C, P-06-001 rev. C, P-07-001 rev. C, P-09-001 rev. C, P-18-001 rev. C, P-20-001 rev. C, P-22-001 rev. B, P-B1-001, P-RF-001 rev. C, P-D-00-001 rev. C, P-D-MZ-001, P-D-01-001 rev. C, P-D-02-001 rev. C, P-D-03-001 rev. C, P-D-04-001 rev. C, P-D-05-001 rev. C, P-D-07-001 rev. C, P-D-09-001 rev. C, P-D-18-001 rev. C, P-D-20-001 rev. C, P-D-22-001 rev. C, P-D-B1-001, P-D-00-002 rev. B, P-D-01-002 rev. B, P-D-02-002 rev. B, P-D-03-002 rev. B, P-D-05-002 rev. B, E-E-001, E-N-001 rev. B, E-NW-001 rev. C, E-S-001, E-SW-001, S-AA-BB-001, S-CC-001, S-DD-001 rev. B, S-EE-001, S-FF-001, S-GG-001, S-HH-001, S-JJ-001, S-KK-001, S-LL-001, DET-001, DET-002, DET-003

Reason: In order to avoid doubt and in the interests of good planning.

3. Notwithstanding the information submitted with this application, no development (excluding demolition) shall take place until precise details and samples of the external materials (including mortar) to be used in connection with the development hereby permitted be submitted to, approved in writing by and implemented in accordance with the requirements of the Local Planning Authority and retained as such in perpetuity.

Reason: In order to retain control over the external appearance of the development in the interest of the visual amenity of the area and consistent with Policy SP11 of the Haringey Local Plan 2013 and Saved Policy UD3 of the Haringey Unitary Development Plan 2006.

4. Notwithstanding the information submitted with this application, no development (excluding demolition) shall take place until detailed drawings, of all elevations have been submitted to and approved in writing by the Local Planning Authority including 1:20 plans of the brick panels, balcony and canopy details and window reveals the development shall be carried out in accordance with the approved details retained as such in perpetuity.

Reason: In order to retain control over the external appearance of the development in the interest of the visual amenity of the area and consistent with Policy SP11 of the Haringey Local Plan 2013 and Saved Policy UD3 of the Haringey Unitary Development Plan 2006.

5. No development (excluding demolition) shall take place until full details of both hard and soft landscape works have been submitted to and approved in writing by the local planning authority and these works shall be carried out as approved. These details shall include: proposed finished levels or contours; means of enclosure; car parking layouts; other vehicle and pedestrian access and circulation areas; hard surfacing materials; minor artefacts and structures (eg. furniture, play equipment, refuse or other

storage units, signs, lighting etc.); proposed and existing functional services above and below ground (eg. drainage power, communications cables, pipelines etc. indicating lines, manholes, supports etc.); retained historic landscape features and proposals for restoration, where relevant.

Soft landscape works shall include planting plans; written specifications (including cultivation and other operations associated with plant and grass establishment); schedules of plants, noting species, plant sizes and proposed numbers/densities where appropriate; implementation programme]. The soft landscaping scheme shall include detailed drawings of:

Those new trees and shrubs to be planted together with a schedule of species shall be submitted to, and approved in writing by, the Local Planning Authority prior to the commencement of the development, excluding demolition. Such an approved scheme of planting, seeding or turfing comprised in the approved details of landscaping shall be carried out and implemented in strict accordance with the approved details in the first planting and seeding season following the occupation of the building or the completion of development (whichever is sooner). Any trees or plants, either existing or proposed, which, within a period of five years from the completion of the development die, are removed, become damaged or diseased shall be replaced in the next planting season with a similar size and species. The landscaping scheme shall be implemented in accordance with the approved details and retained thereafter.

Reason: In order for the Local Planning Authority to assess the acceptability of any landscaping scheme in relation to the site itself, thereby ensuring a satisfactory setting for the proposed development in the interests of the visual amenity of the area consistent with Policy 7.21 of the London Local Plan 2011, Policy SP11 of the Haringey Local Plan 2013 and Policy UD3 of the Haringey Unitary Development Plan 2006.

6. No development shall start until an Arboricultural impact assessment, tree protection plan and Arboricultural method statement have been provided showing details of any pruning required to the existing and trees and details of the proposed foundations in connection with the development, hereby approved and any excavation for services shall be agreed in writing with the Local Planning Authority. The development shall be implemented in accordance with the approved scheme. No development shall start until all those trees to be retained, as indicated on the approved drawings, have been protected by secure, stout, exclusion fencing erected at a minimum distance equivalent to the branch spread of the trees and in accordance with BS 3998:2010 and to a suitable height. Any works connected with the approved scheme within the branch spread of the trees shall be by hand only. No storage of materials, supplies or plant

machinery shall be stored, parked, or allowed access beneath the branch spread of the trees or within the exclusion fencing.

Reason: In order to safeguard the root systems of those trees on the site which are to remain after building works are completed in the interests of visual amenity.

Reason: In order to ensure the safety and well being of the trees on the site during constructional works that are to remain after building works are completed consistent with Policy 7.21 of the London Plan 2011, Policy SP11 of the Haringey Local Plan and Saved Policy UD3 of the Haringey Unitary Development Plan 2006.

7. All residential units within the proposed development shall be designed to Part M4 (2) 'accessible and adaptable dwellings' of the Building Regulations 2015 (formerly Lifetime Homes Standard) unless otherwise agreed in writing with the Local Planning Authority.

Reason: To ensure that the proposed development meets the Council's Standards in relation to the provision of wheelchair accessible homes and to comply with Haringey Local Plan 2013 Policy SP2 and the London Plan Policy 3.8.

8. At least 10% of all dwellings within each tenure type shall be wheelchair accessible or easily adaptable for wheelchair use (Part M4 (3) 'wheelchair user dwellings' of the Building Regulations 2015) unless otherwise agreed in writing with the Local Planning Authority.

Reason: To ensure that the proposed development meets the Council's Standards for the provision of wheelchair accessible dwellings in accordance with Haringey Local Plan 2013 Policy SP2 and the London Plan Policy 3.8.

9. The development hereby approved shall be designed to Secured by Design Sections 2 and 3 Compliance unless otherwise agreed in writing with the Local Planning Authority.

Reason: To ensure that the proposed development meets the Police standards for the physical protection of the building and its occupants. and to comply with Haringey Local Plan 2013 Policy SP11.

10. No impact piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water.

Any piling must be undertaken in accordance with the terms of the approved piling method statement.

Reason: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to impact on local underground sewerage utility infrastructure. The applicant is advised to contact Thames Water Developer Services on 0800 009 3921 to discuss the details of the piling method statement.

11. Before development commences other than for investigative work:

- a) A desktop study shall be carried out which shall include the identification of previous uses, potential contaminants that might be expected, given those uses, and other relevant information. Using this information, a diagrammatical representation (Conceptual Model) for the site of all potential contaminant sources, pathways and receptors shall be produced. The desktop study and Conceptual Model shall be submitted to the Local Planning Authority. If the desktop study and Conceptual Model indicate no risk of harm, development shall not commence until approved in writing by the Local Planning Authority.
- b) If the desktop study and Conceptual Model indicate any risk of harm, a site investigation shall be designed for the site using information obtained from the desktop study and Conceptual Model. This shall be submitted to, and approved in writing by the Local Planning Authority prior to that investigation being carried out on site. The investigation must be comprehensive enough to enable:-
 - a risk assessment to be undertaken,
 - refinement of the Conceptual Model, and
 - the development of a Method Statement detailing the remediation requirements.

The risk assessment and refined Conceptual Model shall be submitted, along with the site investigation report, to the Local Planning Authority.

- c) If the risk assessment and refined Conceptual Model indicate any risk of harm, a Method Statement detailing the remediation requirements, using the information obtained from the site investigation, and also detailing any post remedial monitoring shall be submitted to, and approved in writing by, the Local Planning Authority prior to that remediation being carried out on site.

12. Where remediation of contamination on the site is required completion of the remediation detailed in the method statement shall be carried out and a report that provides verification that the required works have been

carried out, shall be submitted to, and approved in writing by the Local Planning Authority before the development is occupied.

Reason: To ensure the development can be implemented and occupied with adequate regard for environmental and public safety.

13. Prior to installation, details of the Ultra Low NOx boilers for space heating and domestic hot water should be forwarded to the Local Planning Authority. The boilers to be provided for space heating and domestic hot water shall have dry NOx emissions not exceeding 40 mg/kWh.

Reason: To prevent an increase in local problems of air quality within an Air Quality Management Areas (AQMAs) as required by The London Plan Policy 7.14.

14. Prior to installation details of the CHP boilers shall be submitted to, and approved in writing by the Local Planning Authority. Evidence shall demonstrate the unit to be installed complies with the emissions standards as set out in the GLA SPG Sustainable Design and Construction for Band B.

Reason: To prevent an increase in local problems of air quality within an Air Quality Management Areas (AQMAs) as required by The London Plan Policy 7.14.

15. No works shall be carried out on the site until a detailed Air Quality and Dust Management Plan (AQDMP), detailing the management of demolition and construction dust, has been submitted and approved by the LPA. The plan shall be in accordance with the GLA SPG Dust and Emissions Control and shall also include a Dust Risk Assessment. Details of all plant and machinery to be used at the demolition and construction phases shall be submitted to, and approved in writing by the Local Planning Authority prior to the commencement of each phase. Evidence is required to meet Stage IIIA of EU Directive 97/68/ EC for both NOx and PM. No works shall be carried out on site until all Non-Road Mobile Machinery (NRMM) and plant to be used on the site of net power between 37kW and 560 kW has been registered at <http://nrmm.london/>. Proof of registration must be submitted to the Local Planning Authority prior to the commencement of any works on site.

Reason: To prevent an increase in local problems of air quality within an Air Quality Management Areas (AQMAs) as required by The London Plan Policy 7.14.

16. Prior to the commencement of any works the site or Contractor Company is to register with the Considerate Constructors Scheme. Proof of registration must be sent to the LPA.

Reason: In the interests of neighbouring amenity.

17. An inventory of all NRMM must be kept on site during the course of the demolitions, site preparation and construction phases. All machinery should be regularly serviced and service logs kept on site for inspection. Records should be kept on site which details proof of emission limits for all equipment. This documentation should be made available to local authority officers as required until development completion.
Reason: To prevent an increase in local problems of air quality within an Air Quality Management Areas (AQMAs) as required by The London Plan Policy 7.14.
18. The development hereby approved shall not be occupied until a Delivery and Servicing Plan (DSP) have been submitted to, and approved in writing by the Local Planning Authority. The servicing and delivery plan must also include a waste management plan which includes details of how refuse is to be collected from the site, the plan should be prepared in line with the requirements of the Council's waste management service which must ensure that all bins are within 10 metres carrying distances of a refuse truck on a waste collection day.
Reason: To ensure that the development does not prejudice the free flow of traffic or public safety along the neighbouring highway.
19. Prior to the commencement of demolition works a Demolition Management Plan (CMP) and Demolition Logistics Plan (CLP) shall be submitted to and approved in writing by the local planning authority. The Plans should provide details on how demolition works will be undertaken in a manner that disruption to traffic and pedestrians on Seven Sisters Road, Stonebridge Road and the surrounding residential roads is minimised. Vehicle movements shall be carefully planned and co-ordinated to avoid the AM and PM peak periods.
Reason: To reduce congestion and mitigate any obstruction to the flow of traffic on the transportation and highways network
20. Prior to the commencement of construction works (excluding demolition) a Construction Management Plan (CMP) and Construction Logistics Plan (CLP) shall be submitted to and approved in writing by the local planning authority. The Plans should provide details on how Construction works (excluding demolition) will be undertaken in a manner that disruption to traffic and pedestrians on Seven Sisters Road, Stonebridge Road and the surrounding residential roads is minimised. Construction vehicle movements shall be carefully planned and co-ordinated to avoid the AM and PM peak periods.
Reason: To reduce congestion and mitigate any obstruction to the flow of traffic on the transportation and highways network
21. The development shall not be occupied until a minimum of 265 cycle parking spaces for users of the development, have been installed in

accordance with the approved details. Such spaces shall be retained thereafter for this use only.

Reason: To promote sustainable modes of transport in accordance with Policies 6.1 and 6.9 of the London Plan 2011 and Policy SP7 of the Haringey Local Plan 2013.

22. Evidence that each commercial element of the development is registered with a BREEAM certification body and that a pre-assessment report (or design stage certificate with interim rating if available) has been submitted indicating that the development can achieve the stipulated BREEAM level 'Very good' shall be presented to the local planning authority within 6 weeks of the date of this decision and a final certificate shall be presented to the local planning authority within 6 months of the occupation of the development.

Reason: To ensure that the development achieves a high level of sustainability in accordance with Policies 5.1, 5.2, 5.3 and 5.15 of the London Plan 2011 and Policies SP0 and SP4 the Haringey Local Plan 2013.

23. Prior to commencement of the development, save for demolition, full details of the single Energy Centre as set out in Appendix C of the submitted Energy Strategy, operational details of the heat network (pressures and temperatures), the location of the energy centre provision of space for future heat exchangers should the network not be delivered at this time. and communal network future proofing measures, including details of the safeguarded connection between the energy centre to the public highway, that will be reserved for connectivity to the area wide network should be submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure that the completed development is future proofed to enable connection to an area wide decentralised energy network to comply with Policies 5.5 and 5.6 of the London Plan 2011 and Policies SP0 and SP4 of the Haringey Local Plan 2013.

24. The development hereby permitted shall be built in accordance with the Apex House: Energy Strategy (rev 2) By: Hoare Lea; Date: September 2015 and the energy provision shall be thereafter retained in perpetuity, no alterations to the energy or sustainability measures shall be carried out without the prior approval, in writing, of the Local Planning Authority. For the avoidance of doubt this shall include, the location of the energy centre and site wide heating network operations; route for connections to the energy centre (the area identified for the heat exchangers) from the public highway and 40m² of solar PV on the roof of the development (as drawn in Appendix D of the Energy Statement).

Reason: To ensure that a proportion of the energy requirement of the development is produced by on-site renewable energy sources to comply

with Policy 5.7 of the London Plan 2011 and Policies SP0 and SP4 of the Haringey Local Plan 2013

25. The development hereby permitted (excluding demolition) shall not be begun until details of the design, implementation, maintenance and management of the sustainable drainage scheme have been submitted to and approved in writing by the local planning authority. Those details shall include:

- a) Information about the design storm period and intensity, discharge rates and volumes (both pre and post development), temporary storage facilities, means of access for maintenance, the methods employed to delay and control the surface water discharged from the site and the measures taken to prevent flooding and pollution of the receiving groundwater and/or surface waters;
- b) Any works required off-site to ensure adequate discharge of surface water without causing flooding or pollution (which should include refurbishment of existing culverts and headwalls or removal of unused culverts where relevant);
- c) Flood water exceedance routes, both on and off site;
- d) A timetable for its implementation, and
- e) A management and maintenance plan for the lifetime of the development which shall include the arrangements for adoption by an appropriate public body or statutory undertaker, management and maintenance by a Residents' Management Company or any other arrangements to secure the operation of the sustainable drainage scheme throughout its lifetime.

Once approved, the scheme shall be implemented, retained, managed and maintained in accordance with the approved details.

Reason: To prevent the increased risk of flooding, to improve and protect water quality, improve habitat and amenity, and ensure future maintenance of the surface water drainage system.

26. No building or use hereby permitted shall be occupied or the use commenced until the sustainable drainage scheme for this site has been completed in accordance with the submitted details as shown on 14411/500/41 Rev B and SK05. The sustainable drainage scheme shall be managed and maintained thereafter in accordance with the agreed management and maintenance plan.

Reason: To ensure that the principles of sustainable drainage are incorporated into this proposal and maintained thereafter.

27. The development hereby approved shall not be occupied until such time as 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 have been carried out and completed.

Reason: In the interests of highway safety.

28. The development shall not be occupied until such time as the refuse and waste storage and recycling facilities shown on 584-G200-P-00-001 Rev A have been implemented. The refuse and waste storage and recycling facilities shall be permanently retained thereafter.

Reason: In order to protect the amenities of the locality and to comply with Saved Policy UD7 of the Haringey Unitary Development Plan 2006 and Policy 5.17 of the London Plan 2011.

29. Details of the species and location of a 5 x replacement trees (20-25cm stem girth) shall be agreed with the Local Planning Authority in writing before commencing the development hereby approved (excluding demolition), and shall be planted within the next planting season after the development hereby approved is completed.

Reason: In the interests of visual amenity and to conserve the contribution of trees to the character of the area.

30. The design and installation of new items of fixed plant hereby approved by this permission shall be such that, when in operation, the cumulative noise level LAeq 15 min arising from the proposed plant, measured or predicted at 1m from the facade of nearest residential premises shall be a rating level of at least 5dB(A) below the background noise level LAF90. The measurement and/or prediction of the noise should be carried out in accordance with the methodology contained within BS 4142: 1997. Upon request by the local planning authority a noise report shall be produced by a competent person and shall be submitted to and approved by the local planning authority to demonstrate compliance with the above criteria.

Reason: In order to protect the amenities of nearby residential occupiers consistent with Policy 7.15 of the London Plan 2011 and Saved Policy UD3 of the Haringey Unitary Development Plan 2006.

31. The development hereby permitted shall be built in accordance with the recommendations set out in section 6.1 - 6.4 of the extended phase 1 habitat survey and the proposed biological enhancements installed prior to the occupation of the proposed buildings and retained thereafter in perpetuity.

Reason: To ensure that the development will make a positive contribution to the protection, enhancement, creation and management of biodiversity) in accordance with London Plan Policies Policy 7.19 and Local Plan Policy SP13.

32. The existing architects or other such architects as approved in writing by the Local Authority acting reasonably shall undertake the detailed design of the project.
Reason: In order to retain the design quality of the development in the interest of the visual amenity of the area and consistent with Policy SP11 of the Haringey Local Plan 2013 and Saved Policy UD3 of The Haringey Unitary Development Plan 2006.
33. Prior to the completion of the development hereby permitted, a shutter and signage strategy shall be submitted to and approved in writing by the Local Planning Authority all future proposal for shutters and signage shall be in accordance with this strategy.
Reason: In order to retain the design quality of the development in the interest of the visual amenity of the area and consistent with Policy SP11 of the Haringey Local Plan 2013 and Saved Policy UD3 of the Haringey Unitary Development Plan 2006.
34. Notwithstanding the Provisions of Article 4 (1) and part 25 of Schedule 2 of the Town and Country Planning (General Permitted Development) Order 2015, no satellite antenna shall be erected or installed on the building hereby approved. The proposed development shall have a central dish or aerial system for receiving all broadcasts for the residential units created: details of such a scheme shall be submitted to and approved by the Local Planning Authority prior to the occupation of the property, and the approved scheme shall be implemented and permanently retained thereafter.
Reason: In order to prevent the proliferation of satellite dishes on the development.
35. No external illumination of the external elevations to the building shall take place other than in accordance with a detailed building lighting scheme which shall be submitted to and approved in writing by the LPA,
Reason: To ensure that any external lighting of the building has regard to the visual amenity of the area including the character and appearance of the conservation area, the amenities of surrounding properties and the safety of users of the surrounding highway network.
36. Prior to the development of the building above ground level a scheme for the phased delivery and long term management of the private and public spaces within and adjacent to the building shall be submitted to and approved in writing by the LPA. The development shall be carried out only in accordance with the approved landscape/public realm phasing and management scheme.
Reason to ensure that the development secures the delivery of appropriate landscaping and amenity space for future residents and makes provision for effective, safe long term management of each of the

spaces to ensure continued utility and enjoyment of the spaces by occupiers and the improvement of the streetscape in accordance with the objectives (and public benefit) associated with the grant of this planning permission.

Informatives:

INFORMATIVE : In dealing with this application, Haringey Council has implemented the requirements of the National Planning Policy Framework and of the Town and Country Planning (Development Management Procedure) (England) (Amendment No.2) Order 2012 to foster the delivery of sustainable development in a positive and proactive manner.

INFORMATIVE : CIL - Based on the information given on the plans, the Mayoral CIL charge will be £486,535 (13,872 sqm x £35) and the Haringey CIL charge will be £106,350 (7,090 sqm x £15). 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 construction costs index.

INFORMATIVE : Hours of Construction Work: The applicant is advised that under the Control of Pollution Act 1974, construction work which will be audible at the site boundary will be restricted to the following hours:-
- 8.00am - 6.00pm Monday to Friday
- 8.00am - 1.00pm Saturday
- and not at all on Sundays and Bank Holidays.

INFORMATIVE : Party Wall Act: The applicant's attention is drawn to the Party Wall Act 1996 which sets out requirements for notice to be given to relevant adjoining owners of intended works on a shared wall, on a boundary or if excavations are to be carried out near a neighbouring building.

INFORMATIVE : The new development will require numbering. The applicant should contact the Local Land Charges at least six weeks before the development is occupied (tel. 020 8489 5573) to arrange for the allocation of a suitable address.

INFORMATIVE : The London Fire Brigade strongly recommends that sprinklers are considered for new developments and major alterations to existing premises, particularly where the proposals relate to schools and care homes. Sprinkler systems installed in buildings can significantly reduce the damage caused by fire and the consequential cost to businesses and housing providers, and can reduce the risk to life. The Brigade opinion is that there are opportunities for developers and building owners to install sprinkler systems in order to save money, save property and protect the lives of occupier. .

INFORMATIVE: With regards to surface water drainage, it is the responsibility of a developer to make proper provision for drainage to ground, water course, or a suitable sewer. In respect of surface water, it is recommended that the applicant should ensure that storm flows are attenuated or regulated into the receiving public network through on or off site storage. When it is proposed to connect to a combined public sewer, the site drainage should be separate and combined at the final manhole nearest the boundary. Connections are not permitted for the removal of groundwater. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. They can be contacted on 0845 850 2777.

INFORMATIVE : Thames Water will aim to provide customers with a minimum pressure of 10m head (approx. 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.

INFORMATIVE: Prior to demolition of existing buildings, an asbestos survey should be carried out to identify the location and type of asbestos containing materials. Any asbestos containing materials must be removed and disposed of in accordance with the correct procedure prior to any demolition or construction works carried out.

8.0 PROPOSED DEVELOPMENT AND SITE LOCATION DETAILS

8.1 Proposed Development

- 8.1.1 Non-material amendment following a grant of planning permission HGY/2012/0915 for the installation of a new public art wind screen to Seven Sisters Road. The proposed amendment comprises a 1 metre wide 3.6 metre high wind screen on the Sevens Sisters Road elevation of the approved development located between the proposed retain units 49 and 50. It will be clad in hard standing steel and will act as a wind mitigation mechanism for the pavement outside the market entrance.

8.2 Site and Surroundings

- 8.2.1 The Wards Corner site is a prominent site located on the Western side of Tottenham High Road and comprises 227 to 259 High Road, 709 – 723 Seven Sisters Road, 1a – 11 West Green Road and 8 – 30 Suffield Road, which are all 2/3 storey Victorian properties. The net site area is 0.65 of a hectare. The site contains the former Wards Corner Department Store and is situated above the Seven Sisters Victoria Line Underground Station and tunnels.
- 8.2.2 The site comprises retail and commercial floorspace on the ground and first floors on the High Road footage with retail and commercial on the ground floor and residential above on the other two main frontages. Suffield Road is a one way road and is different in character being a relatively quiet residential street. There are currently 33 residential units falling within the boundary of the site.
- 8.2.3 The front part of the site falls within the West Green Road/Seven Sisters Conservation Area. The West Green Road/Seven Sisters shopping area is classified as a District Centre the total retail floorspace on site is currently 3,182sq metres. The existing buildings currently incorporate an indoor market comprising 36 separate units.
- 8.2.4 Currently a significant number of traders are from Spanish speaking backgrounds. The site has a public transport accessibility level of 6.

8.3 Relevant Planning and Enforcement history

- 8.3.1 HGY/2012/0915 and HGY/2012/0921) for the adjacent site at Wards Corner for the same applicant, on 12 July 2012 for: *“Demolition of existing buildings and erection of a mixed use development comprising class C3 residential, class A1/A2/A3/A4 uses, with access, parking and associated landscaping and public realm improvements”*. The proposal requires the accumulation of property which

is not in the applicant's ownership. The Council's Cabinet granted resolution to use Compulsory Purchase Order (CPO) powers 10/11/15, the Order itself has yet to be made.

- 8.3.2 HGY/2014/0575 on 22nd April 2014 for restoration of the existing market and corner building bringing 2150 m2 of derelict space into A1, A2, A3 and B1 use, installation of bay windows to the front, dormer windows to the front and rear, reinstatement of chimneys, replacement of existing shop-fronts to the front of the market with new glazed facade, improvements to the public realm to the front of the market, new glazed rear doors added to the rear, new DDA compliant access to the first and second floor, reintroduction of internal light-wells from the first to ground floor and insulation of building to increase thermal efficiency.

9.0 LOCAL REPRESENTATIONS

- 9.1 The following were consulted:

154 Neighbouring properties

- 9.2 The following Residents Associations/Civic/Amenity Groups:
Tottenham CAAC Joyce Rosser 46 Redston Road London
Wards Corner Community Coalition
Page Green Residents Association
Tottenham Civic Society

- 9.3 4 site notices were erected close to the site

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

No of individual responses: 3
Objecting: 3

- 9.5 The following local groups/societies made representations:
Seacole Court Residents' Association

- 9.6 The issues raised in representations that are material to the determination of the application are summarised as follows:

- The wind mitigation is inappropriate for its environment
- The pavement is already cluttered
- The screen vulnerable to defacement
- Will increase noise pollution

- 9.7 The following issues raised are not material planning considerations:

- Wind mitigation has not been a problem in the past (Officer Comment: the rationale for the proposal is not a material planning consideration)
- Will aid the purchase of Apex House (Officer Comment: the rationale for the proposal is not a material planning consideration)

10.0 ASSESSMENT

- 10.1 S96 of the Town and Country Planning Act 1990 (as amended) allows the Council to make a change to any planning permission if satisfied that the change is not material. An application for a non-material amendment can only be made by or on behalf of a person with an interest in the land to which the planning permission relates and the application may be made only in respect of so much of the planning permission as affects the land in which the person has an interest.
- 10.2 The applicant has sought a non-material amendment to the approved scheme at Wards Corner to provide a wind mitigation screen for the proposal at Apex House. The location of the screen is on land which the applicant currently owns.
- 10.3 The National Planning Practice Guidance (NPPG) sets out that there is no statutory definition of 'non-material'. This is because it will be dependent on the context of the overall scheme – an amendment that is non-material in one context may be material in another. The local planning authority must be satisfied that the amendment sought is non-material in order to grant an application. As an application to make a non-material amendment is not an application for planning permission, the existing Town and Country Planning (Development Management Procedure) (England) Order 2015 provisions relating to statutory consultation and publicity do not apply. Therefore local planning authorities have discretion in whether and how they choose to inform other interested parties or seek their views.
- 10.4 The NPPG states that when making a decision the local planning authority must have regard to the effect of the change, together with any previous changes made under section 96A. They must also take into account any representations made by anyone notified, provided they are received within 14 days of notification. As this is not an application for planning permission, section 38(6) of the Planning and Compulsory Purchase Act 2004 does not apply.
- 10.5 In this instance due to level of public interest in both the current Apex House proposal and the approved Wards Corner scheme the LPA has carried out consultation with properties within view of the proposed amendment. Several responses have been received. In objecting to the proposals they suggest that the wind mitigation measure is inappropriate for its environment because of its impact upon the pavement environment and noise pollution.

- 10.6 The mitigation measures proposed are associated with the proposals for the redevelopment of the Wards Corner site. These proposals involve comprehensive development along the Seven Sisters Road frontage that will have a significant impact upon the appearance of the area. The proposals will replace a number of the existing shop units and will prompt changes in the pavement area in this area. Whilst therefore noting the concerns expressed about clutter, the expectation is that the redevelopment will precipitate a change of the way that the pavement area along the site frontage is used.
- 10.7 The proposed amendment comprises a 1 metre wide 3.6 metre high wind screen on the Seven Sisters Road elevation of the approved development located between the proposed retain units 49 and 50. It will be clad in hard standing steel and will act as a wind mitigation mechanism for the pavement outside the market entrance. Against a backdrop of a comprehensive redevelopment up to 7 stories in height the proposed additional screen is considered to be small in scale and impact in relation to the proposed building and is considered to not materially impact on the appearance of the proposed building and the conservation area or increase noise pollution.
- 10.8 An additional condition will be attached to the amended permission requiring the final details of the public art proposed on the structure to be submitted to and approved by the planning authority. Subject to that provision, it is considered that a non-material amendment can be granted.

11.0 RECOMMENDATION

GRANT Non-Material Amendment

Applicant's drawing No.(s) P(00)01_E(1), P(00)01_F, P(00)21B, P(00)22_-, P(00)100_D and P(00)100_E

Condition:

The final design of the public art to be displayed on the windscreen hereby approved shall be submitted to, and approved in writing by, the Local Planning Authority before any development is commenced (excluding demolition). The development shall be carried out in accordance with the approved details thereafter

Reason: In order for the Local Planning Authority to retain control over the exact detail of the proposed development in the interests of visual amenity consistent with Policies 7.6 and 7.8 of the London Plan 2015, Policies SP11 and S12 of the Haringey Local Plan 2013 and Saved Policy UD3 of the Haringey Unitary Development Plan 2006.

Appendix 1 Consultation Responses from internal and external agencies

Stakeholder	Question/Comment	Response
INTERNAL		
Transportation	<p><u>Transport Context</u> The development site is located in an area with a high public transport accessibility level, PTAL 6b (0 being the worst and 6b being the best). The site has the highest accessibility to public transport possible with 11 bus routes (46, 349, 243, 318, 476, 149, 76, W4, 41, 259, and 279) operating in close proximity to the site. The frequencies of buses on the routes serving the site range from 4 to 12 vehicles per hour, with an average frequency of 92 vehicles per hour. Seven Sisters Rail and LUL Stations are approximately 116m from the site, which 1.5 minutes walk time. South Tottenham Rail Station is approx. 310m from the site and can be reached by walking in 3.8 minutes.</p> <p>There are planned public transport improvements, which will further enhance the public transport accessibility of the site. Seven Sisters Road Station is part of the proposed Crossrail 2 project, which is currently under consultation. Other planned transport improvements in the locality include Cycle Superhighway 1, which is aimed at improving the cycle link between Tottenham and Old Street. The Cycle Superhighway 1 (CS1) project is recently completed. In the vicinity of the site CS1 consists of northbound and southbound segregated cycle lanes along Tottenham High Road, to the east of the development site.</p> <p>The development site is at the junction of Seven Sisters</p>	<p>Noted, conditions and S106 obligations attached as recommended.</p>

Stakeholder	Question/Comment	Response
	<p>Road and Tottenham High Road, which are both part of the TLRN (Transport for London Road Network). Seven Sisters Road forms part of the A503 route, whilst Tottenham High Road forms part of the A10 route.</p> <p>Stonebridge Road to the Southwest of the site is a private residential road that provides vehicle access to the existing car park at Apex House and serves as access to the adjoining residential properties; Stonebridge Road is owned by the Council and managed by Hackney Homes.</p> <p>The adjoining roads are subject to a variety of parking restrictions. Tottenham High Road and Seven Sisters Road are TLRN and therefore are subject to Red Route restrictions. The surrounding LB Haringey adopted highways are included in a controlled parking zone (CPZ), with parking restrictions operating Monday to Saturday 8:30AM to 6:30PM. Stonebridge Road is under the private parking regime, which allows parking for residents only.</p> <p><u>Description of Development</u></p> <p>The proposal entails demolition of the existing building and redevelopment to provide: a new high-rise apartment block with 163 residential units (104 private and 59 affordable); 2,134m² of residential amenity spaces; 873m² commercial/retail floor space to replace the existing cover market at Wards Corner or other retail/commercial uses; provision of servicing for the market; provision of 16 on-street disabled car parking spaces; 261 cycle parking spaces; and public realm enhancements.</p>	

Stakeholder	Question/Comment	Response
	<p><u>Trip Generation</u> The trip generation analysis presented in the Transport Assessment suggests that the proposal will generate fewer vehicle trips than the existing development and the conclusion follows that the proposal will not create any detrimental traffic impacts on the adjoining highway network. Transport officers concur with this conclusion.</p> <p>The trip generation analysis shows that the proposal will create an increase in trips by public transport (Bus, Rail and Underground). The net trip generation for public transport forecasted some 414 two-way trips over a 12 hour period (07:00 to 19:00). This translates into 71 two-way public transport trips in the AM peak and 49 two-way public transport trips in the PM peak. The breakdown per public transport mode is 40, 9 and 22 underground, rail and bus trips respectively, during the AM (08:00-09:00) peak; and 28, 6 and 15 underground, rail and bus trips respectively, during the PM (17:00-18:00) peak. The additional public transport trips can be accommodated comfortably within the current public transport capacity and is therefore deemed to have no material impact.</p> <p>As the commercial space is proposed to be used for the market which will be transferred only some 67 metres for the existing location we have considered that these trips already exist on the local transport network and the relocation on the site some 67 metres will no change the nature of these tips, hence we agree that there is no need for these tips to be assessed as part of the cumulative impact of the development on the highways network, with the exception of servicing, which is</p>	

Stakeholder	Question/Comment	Response
	<p>assessed below, and will be Conditions byway of a service and deliver plan.</p> <p>The development is expected to generate 16 service/delivery trips per day for the market element. The TA suggests that vehicles servicing the market would be vans of 6m or less, and 7.5t lorries. The service trip generation of the site is not expected to create any significant effects during peak traffic periods. There is some concern that during servicing there may be some temporary congestion on Stonebridge Road however this will be temporary in nature.</p> <p>The TA predicts a net increase in pedestrian trips during the AM and PM peak traffic periods. An additional 414 pedestrian two-way trips over a 12 hour period (07:00 – 19:00) is predicted. The increased pedestrian trips during the AM and PM peaks are small and can be accommodate within the existing pedestrian provisions. A small net increase in cycle movement is predicted – 2 and 2 two-way cycle trips during the AM and PM peak traffic periods respectively. Such a small increase would have little impact on the adjoining road network.</p> <p><u>Parking Provision</u></p> <p>The approach to parking under the proposal is consistent with London Plan 6.13 and saved UDP policy M9 i.e. encouraging minimum car parking provision in areas of excellent transport accessibility, in order to promote the use of non-car modes of travel. The provision of nil on-site car parking is therefore considered to be acceptable given the high public transport accessibility level of the</p>	

Stakeholder	Question/Comment	Response
	<p>site.</p> <p>However, it is a policy requirement that the needs of disabled people are taken into account and adequate disabled parking is provided to ensure that developments are accessible for all. Parking for disabled people should generally be provided off-street, however, where constraints dictate otherwise, disabled car parking can be provided on-street, providing that there is spare on-street parking capacity and that the disabled car parking spaces can be located within the maximum distance (50m) from the principal entrance of the development.</p> <p>The applicant has indicated (at Appendix 3 of the Transport Statement) the locations where disabled car parking spaces will be provided in the adjoining street – Stonebridge Road. A survey of parking in Stonebridge Road was undertaken and found that the maximum consumption of parking was 77 out of 127 permit parking spaces. This suggests that Stonebridge Road has spare capacity of 50 parking spaces. With the removal of six (6) car parking spaces to provide for servicing, the spare capacity is reduced to 44 spaces. The applicant proposes to allocate up to 16 of the existing permit parking spaces to disabled parking for the proposed development, reducing the spare capacity to 28 spaces during periods of maximum usage. The disabled car parking spaces can be accommodated within the capacity of Stonebridge Road.</p> <p>As the proposed disabled parking spaces in Stonebridge Road fall outside of the demise of the development site, the applicant is required to produce evidence of an</p>	

Stakeholder	Question/Comment	Response
	<p>agreement with the owner of Stonebridge Road, permitting residents of the development to park in Stonebridge Road must be submitted for inspection and approval by the Transport Officer, prior to the occupation of the development.</p> <p>The applicant proposes to introduce a lower number of disabled car parking spaces in Stonebridge Road initially, increasing the number of spaces in response to the growth in demand, up to the agreed maximum of 16 spaces. The applicant has agreed to produce a Parking Management Plan (PMP) which will keep the demand for disabled parking spaces under review, in order to ensure that sufficient spaces are made available for residents of the development. Consideration must be given to the location of the disabled parking spaces in terms of their proximity to the principal entrance. Disabled parking should be located no greater than 50m from the principal entrance which they serve.</p> <p><u>Access and Servicing Arrangements</u></p> <p>The proposal includes an off-street service yard that takes access via Stonebridge Road, which serve the residential and commercial aspect of the development; including accommodate refuse collection vehicles, domestic deliveries and delivers to the proposed relocated Market. The Transport Assessment includes swept path diagrams which demonstrate that vans servicing accessing the service yard can comfortably maneuver and exit in a forward direction., vehicle swept path analysis have also been provide which demonstrates that refuse vehicles can access the</p>	

Stakeholder	Question/Comment	Response
	<p>proposed service area to collect refuse, the Council's waste management section will require all the bins (45 Euro Bins) to be within 10 metres of the refuse truck.</p> <p>Additional provision for servicing, primarily for the market element of the proposal, consists of on-street loading bays in Stonebridge Road and Seven Sisters Road. The TA suggests that the loading bay design has regard to TfL's bus stop guidance i.e. 15m clear of the Seven Sisters/ Tottenham High Road junction and 13m clear of the nearby bus cage, and is therefore acceptable. The applicant has consulted TfL in relation to the location of the loading bay and the proximity of the existing bus stop, TfL are happy for the loading bay to be included as part of the proposed serving arrangements.</p> <p>The proposed loading bay in Stonebridge Road is also provided on the footway, the details of the loading bay in Stonebridge Road will require the approval of the owners of Stonebridge Road. The provision of the loading bay will also require TfL's approval as the existing Red Route traffic management order in Stonebridge Road will have to be amended.</p> <p>The removal of three (3) existing on-street parking spaces in Stonebridge Road to facilitate the loading bay will not significantly reduce the overall parking capacity in Stonebridge Road but this will require the approval of the owners of the road (Housing/ Homes for Haringey).</p> <p><u>Pedestrian Access</u> The development site sits on two (2) Red Routes and is</p>	

Stakeholder	Question/Comment	Response
	<p>abutted by relatively generous footways widths on its Red Route frontages, as is typical in an urban location. The site has good pedestrian connections to local transport provisions and amenities.</p> <p>Pedestrian access is via three (3) cores which take access from the footway in Tottenham High Road, Seven Sisters Road and Stonebridge Road. It should be noted that the proposed building is set back on its Seven Sisters Road, Tottenham High Road and Stonebridge Road frontages, effectively creating wider footways. The proposed widening will improve the pedestrian environment and is viewed positively by the Council; providing that the additional space created by the set back of the building will be publicly accessible.</p> <p><u>Cycle Access and Parking</u></p> <p>As set out in the contextual transport information above, there are planned strategic cycle improvements (Cycle Superhighway 1) adjacent to the site, which are aimed at improving north-south cycle connections between Tottenham and Old Street. CS1 cycle lane runs along the Tottenham High Road frontage of the development site. The CS1 proposal entails the creation of a 3 to 3.2m segregated two-way cycle lane on the Tottenham High Road frontage of the development site. Transport officers observe that the footway width on the Tottenham High Road frontage of the site is slightly narrower than the footway adjacent to Seacole Court. A further enhancement on the CS1 proposal in Tottenham High Road would be an adjustment of the site boundary (Red Line) to align with the adjoining Seacole House</p>	

Stakeholder	Question/Comment	Response
	<p>boundary/back of footway, thus allowing the residual slither of land along the Tottenham High Road frontage of the site to be included in the adjoining CS1 cycle lane.</p> <p>The TA states that a total of 265 cycle parking spaces are provided on the ground floor and mezzanine level for the proposed uses. The planning application drawings indicate 135 cycle parking spaces on ground floor and 135 cycle parking spaces on the mezzanine floor. 265 cycle parking spaces satisfy the recommendations set out in the London Plan (FALP, 2015, Table 6.3).</p> <p><u>Accident Analysis</u> The TA included an analysis of accidents in the area over a 36 months period ending in November 2014. The data obtained from TfL shows that 99 accidents occurred during this 36 months period. The most common location for accidents were observed to be the junction of Seven Sisters Road with Tottenham High Road and Tottenham High Road/ Broad Lane junction. However, none of the accidents within the area assessed were fatal accident. The nature of the accidents observed during the 36 months period suggests that no specific mitigation aimed at reducing accidents is required. However, it should be noted that as part of the proposed CS1 scheme, the pedestrian crossing connecting Apex House to the Seven Sisters Road northern footway via the traffic island will be widened, which is expected to improve highway safety in the vicinity of the site.</p> <p><u>Travel Plan</u> The proposal is accompanied by a Framework Travel</p>	

Stakeholder	Question/Comment	Response
	<p>Plan (FTP), which was assessed by TfL's ATTrBute system and was found to have failed. Nonetheless, the aims, objectives and indicative measures outlined in the FTP are broadly acceptable. The applicant is required to produce and submit a Full Travel Plan for the approval of the Council. The Travel Plan must be in place prior to the operation of the development.</p> <p><u>Conclusions</u></p> <p>The development is in an area that is highly accessible by non-car modes and is therefore suited for a car-free development as proposed. The development is deemed consistent with London Plan Policy 6.13, SP7 and saved UDP Policy M10 which promotes car-free developments in areas of high public transport accessibility. The Council seeks a car-free s.106 obligation which removes residents' eligibility to obtain permits to park in the adjoining CPZ bays.</p> <p>The principle of providing on-street disabled car parking spaces are accepted, providing the disabled parking spaces are within a reasonable walking distances from the entrance of the development. The applicant is required to produce evidence of an agreement with the owner of Stonebridge Road with respect to the provision of on-street disabled parking spaces.</p> <p>The development is acceptable on balance providing that the transport issues highlighted in this report are addressed and subject to the planning conditions and obligation.</p>	

Stakeholder	Question/Comment	Response
	<p>1. <u>Car-free Development</u> The owner 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 £1000 (One thousand pounds) towards the amendment of the Traffic Management Order for this purpose.</p> <p>2. <u>Car Club Membership</u> The applicant/developer must establish a car club scheme which ensures that residents of the development has access to a minimum of 2 car, offer all new residents of units within the proposed development a minimum of two years free membership to a local Car Club and £50 driving credit. Evidence that each unit has been offered free membership to the Car Club must be submitted to the Local Planning Authority.</p> <p>3. <u>Travel Plan (Residential)</u> Within three (3) months of first occupation of the proposed new residential development a Travel Plan for the approved residential uses shall have been submitted to and approved by the Local Planning Authority detailing means of conveying information for new occupiers and techniques for advising residents of sustainable travel options. The Travel Plan shall then be implemented in accordance with a timetable of implementation, monitoring and review to be agreed in writing by the</p>	

Stakeholder	Question/Comment	Response
	<p data-bbox="573 235 926 267">Local Planning Authority.</p> <p data-bbox="573 310 1381 412">The developer is required to pay a sum of £3,000 (three thousand pounds) per travel plan for monitoring of the travel plans; this must be secured by S.106 agreement. Reason: To enable residential occupiers to consider sustainable transport options, as part of the measures to limit any net increase in travel movements.</p> <p data-bbox="573 565 1178 597">4. <u>Control Parking Zone consultation CPZ</u> The applicant developer will required to contribute byway of a Section 106 agreement a sum of £23,000 (Twenty three Thousand Pounds) towards the design and consultation on the implementing parking management measures to the south east of the site which are currently not covered by a control parking zone and may suffer from displaced parking as a result of residual parking generated by the development proposal. Reason: To mitigate the impact of the residual parking demand generated by the proposed development on existing residents on the roads to the south east of the site.</p> <p data-bbox="573 1192 1058 1224">5. <u>Section 278 Highway Act 1980</u> The owner shall be required to enter into agreement with the Highway Authority (Transport for London) 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</p>	

Stakeholder	Question/Comment	Response
	<p>Highway, measures for street furniture relocation, carriageway markings, and access and visibility safety requirements. Unavoidable works required to be undertaken by Statutory Services will not be included in the Highway Works Estimate or Payment.</p> <p>6. <u>Delivery and Servicing Plan and Waste Management Plan.</u> The owner shall be required to submit a Delivery and Servicing Plan (DSP) for the local authority's approval. The DSP must be in place prior to occupation of the development. The service and deliver plan must also include a waste management plan which includes details of how refuse is to be collected from the site, the plan should be prepared in line with the requirements of the Council's waste management service which must ensure that all bins are within 10 metres carrying distances of a refuse truck on a waste collection day. Reason: To ensure that the development does not prejudice the free flow of traffic or public safety along the neighbouring highway.</p> <p>7. <u>Cycle Parking</u> Internal lockable space shall be made available within the building for the secure parking of 265 bicycles, as shown on the plans hereby approved, before the first occupation of the development. REASON: To ensure that a reasonable provision is made within the site for the parking of bicycles in the interest of relieving congestion in surrounding streets and improving highway conditions in general.</p>	

Stakeholder	Question/Comment	Response
	<p>8. <u>Parking Management Plan (PMP)</u> Before the use hereby approved first commences, the owner shall submit a Parking Management Plan detailing the provision of car parking spaces for people with disabilities at locations close to the entrances to the building(s). The PMP shall also contain detail so the location and number of disable car parking spaces to be provided Reason: In order to ensure that a reasonable minimum of car parking spaces are provided for people with disabilities.</p> <p>9. <u>Construction Management Plan</u> The owner is required to submit a Construction Management Plan (CMP) and Construction Logistics Plan (CLP) for the local authority's approval prior to construction work commencing on site. The Plans should provide details on how construction work (including any demolition) would be undertaken in a manner that disruption to traffic and pedestrians on Seven Sisters Road, Stonebridge Road and the surrounding residential roads is minimised. It is also requested that construction vehicle movements should be carefully planned and co-ordinated to avoid the AM and PM peak periods.</p>	
Waste Management	<p>The waste storage area needs to be located at the front of the property. The point of collection would be directly from Seven Sisters Road, High Road, Stonebridge Road Each self contained unit will require adequate provision for refuse and recycling off street at the front of the property. I would like to confirm that space must be provided for one 'Standard kerbside collection full set' for each property. The boxes indicated above provide some</p>	<p>Noted, amended plans have been provided to show, a separation of commercial and residential waste, an area for bulk storage, provision for food waste and amendments to allow collection from Stonebridge Road. A detailed refuse management plan will be secured by S106/condition X. The waste management team are now satisfied with</p>

Stakeholder	Question/Comment	Response
	<p>detail about accessibility, design and space requirements. Details of the 'Standard kerbside collection full set' are provided below.</p> <p>The site will require the managing agents to have a cleansing schedule to remove litter from the external areas of the site and cleansing of the waste storage areas. A clear instruction from the managing agents to residents of how and where to dispose of waste responsibly is recommended.</p> <p>The proposed commercial use will require storage for both refuse and recycling waste either internally or externally, arrangements for a scheduled waste collection with a Commercial Waste Contractor will be required.</p> <p>Commercial Business must ensure all waste produced on site are disposed of responsibly under their duty of care within Environmental Protection Act 1990. It is for the business to arrange a properly documented process for waste collection from a licensed contractor of their choice. Documentation must be kept by the business and be produced on request of an authorised Council Official under section 34 of the Act. Failure to do so may result in a fixed penalty fine or prosecution through the criminal Court system.</p> <p>The waste collection point will need to be at the front/side of the property from High Road/Seven Sisters Road/ Stonebridge Road N15 and/or within the development itself.</p>	<p>the proposals for refuse and recycling storage.</p>

Stakeholder	Question/Comment	Response
<p>Environmental Health Pollution</p>	<p><u>Contaminated land: (CON1 & CON2)</u></p> <p><u>CON1:</u></p> <ul style="list-style-type: none"> • Before development commences other than for investigative work: <ul style="list-style-type: none"> a) A desktop study shall be carried out which shall include the identification of previous uses, potential contaminants that might be expected, given those uses, and other relevant information. Using this information, a diagrammatical representation (Conceptual Model) for the site of all potential contaminant sources, pathways and receptors shall be produced. The desktop study and Conceptual Model shall be submitted to the Local Planning Authority. If the desktop study and Conceptual Model indicate no risk of harm, development shall not commence until approved in writing by the Local Planning Authority. b) If the desktop study and Conceptual Model indicate any risk of harm, a site investigation shall be designed for the site using information obtained from the desktop study and Conceptual Model. This shall be submitted to, and approved in writing by the Local Planning Authority prior to that investigation being carried out on site. The investigation must be comprehensive enough to enable:- <ul style="list-style-type: none"> • a risk assessment to be undertaken, • refinement of the Conceptual Model, and 	

Stakeholder	Question/Comment	Response
	<ul style="list-style-type: none"> • the development of a Method Statement detailing the remediation requirements. <p>The risk assessment and refined Conceptual Model shall be submitted, along with the site investigation report, to the Local Planning Authority.</p> <p>c) If the risk assessment and refined Conceptual Model indicate any risk of harm, a Method Statement detailing the remediation requirements, using the information obtained from the site investigation, and also detailing any post remedial monitoring shall be submitted to, and approved in writing by, the Local Planning Authority prior to that remediation being carried out on site.</p> <p><u>And CON2 :</u></p> <ul style="list-style-type: none"> • Where remediation of contamination on the site is required completion of the remediation detailed in the method statement shall be carried out and a report that provides verification that the required works have been carried out, shall be submitted to, and approved in writing by the Local Planning Authority before the development is occupied. <p>Reason: To ensure the development can be implemented and occupied with adequate regard for environmental and public safety.</p> <p>The site is within a TfL NO₂ Focus area and a Haringey council hotspot area for poor air quality. The following</p>	

Stakeholder	Question/Comment	Response
	<p>conditions are recommended;</p> <p><u>Combustion and Energy Plant:</u></p> <ul style="list-style-type: none"> • Prior to installation, details of the Ultra Low NOx boilers for space heating and domestic hot water should be forwarded to the Local Planning Authority. The boilers to be provided for space heating and domestic hot water shall have dry NOx emissions not exceeding 20 mg/kWh. • <i>Reason: To protect local air quality.</i> • No development hereby approved shall commence until details of the CHP boilers have been submitted to, and approved in writing by the Local Planning Authority. Evidence shall demonstrate the unit to be installed complies with the emissions standards as set out in the GLA SPG Sustainable Design and Construction for Band B. Reason: To ensure that the development achieves a high level of sustainability. <p><u>Management and Control of Dust:</u></p> <ul style="list-style-type: none"> • No works shall be carried out on the site until a detailed Air Quality and Dust Management Plan (AQDMP), detailing the management of demolition and construction dust, has been submitted and approved by the LPA. The plan shall be in accordance with the GLA SPG Dust 	

Stakeholder	Question/Comment	Response
	<p>and Emissions Control and shall also include a Dust Risk Assessment. <u>Reason:</u> <i>To Comply with Policy 7.14 of the London Plan</i></p> <ul style="list-style-type: none"> • Prior to the commencement of any works the site or Contractor Company is to register with the Considerate Constructors Scheme. Proof of registration must be sent to the LPA. <u>Reason:</u> <i>To Comply with Policy 7.14 of the London Plan</i> • No works shall commence on the site until all plant and machinery to be used at the demolition and construction phases have been submitted to, and approved in writing by, the Local Planning Authority. Evidence is required to meet Stage IIIA of EU Directive 97/68/ EC for both NOx and PM. No works shall be carried out on site until all Non-Road Mobile Machinery (NRMM) and plant to be used on the site of net power between 37kW and 560 kW has been registered at http://nrmm.london/. Proof of registration must be submitted to the Local Planning Authority prior to the commencement of any works on site. <p>Reason: To protect local air quality.</p> <ul style="list-style-type: none"> • An inventory of all NRMM must be kept on site during the course of the demolitions, site preparation and construction phases. All 	

Stakeholder	Question/Comment	Response
	<p>machinery should be regularly serviced and service logs kept on site for inspection. Records should be kept on site which details proof of emission limits for all equipment. This documentation should be made available to local authority officers as required until development completion. Reason: To protect local air quality.</p> <p><u>As an informative:</u></p> <p>Prior to demolition of existing buildings, an asbestos survey should be carried out to identify the location and type of asbestos containing materials. Any asbestos containing materials must be removed and disposed of in accordance with the correct procedure prior to any demolition or construction works carried out.</p>	
<p>Economic Development</p>	<p>Have the following comments on the Economic Development benefits and impact.</p> <p>1) We would definitely look to realise the proposed construction phase employment opportunities identified in the applicants Economic Impact Assessment. This would include employment, apprenticeships and work placements. We would most likely require an apprenticeship co-ordinator to be nominated and are working on procuring our own provider.</p> <p>2) Additionally we would like to see engagement with schools and the College (CONEL) to provide education, training and work experience opportunities for local students. In particular we would like to see engagement</p>	<p>Noted, S106 obligations attached in relation to local labour and training.</p>

Stakeholder	Question/Comment	Response
	<p>with skills provision at CONELs Construction Centre.</p> <p>3) We would want to be involved in any recruitment during operation, especially if the commercial space ends up not being occupied by the market and subsequently occupied by new businesses creating new positions locally. Our direct employment support service HEST could facilitate candidate selection and interview preparation.</p> <p>4) Because of the significant loss of employment floorspace (75% reduction), we would definitely seek an s106 contribution to compensate for the loss of space for economic opportunity in the borough. This would be through the appropriate methodology set out in the Planning Obligations SPD of £30/m2 lost.</p> <p>5) There remains a question mark over the final end use of the commercial floorspace, presumably awaiting the outcome of the adjacent Wards Corner development proposal - where the indoor market resides. If the market is not the final end user, our preference would be for the commercial space to be utilised as B1 and the Council could work with the applicant to secure tenants.</p>	
<p>Housing Design and Major Sites.</p>	<p>Affordable housing provision The proposed development seeks to provide a 39% affordable housing scheme and as such does not accord with Haringey's 'Strategic Policies' which states that the Council will seek 'to maximise the provision of affordable housing by requiring all development capable of providing 10 units or more residential units to provide affordable housing to meet an overall borough target of</p>	<p>Noted. Conditions 6 and 7 requiring compliance with lifetime homes and 10% wheelchair accessible.</p>

Stakeholder	Question/Comment	Response
	<p>50% by habitable rooms.</p> <p>The scheme does not comply with the adopted London Plan strategic policy 3A.10 which seeks the maximum amount of affordable housing.</p> <p>Dwelling mix and Tenure</p> <p>The Council will seek 70% intermediate and 30% /affordable rent housing with a recommended mix for affordable rent housing of 17% 1 beds, 42% 2 beds and 40% 3 beds; for private sale/rent and intermediate tenure mix of 20% 1 beds, 50% 2 beds, 25% 3 beds and 5% 4 beds.</p> <p>There are currently high levels of social rented housing in the Tottenham constituency wards. In order to balance the levels and promote the area's regeneration, current Local plan policies promotes higher proportions of market sale/rental and intermediate housing in this part of the borough. The proposed mix and type of affordable housing (largely private rental and Intermediate rent for working households) will ensure a more sustainable, balanced and less transient community.</p> <p>The council requires 10% of all new residential developments across all tenures to be fully wheelchair accessible to ensure a housing choice for disabled residents</p> <p>In principle we have agreed the current unit mix for affordable housing total of 59 units, 39%(181 Habitable</p>	

Stakeholder	Question/Comment	Response
	<p>Rooms). This consist of 24 x1 beds, 23 x 2 beds, 8 x 3 beds and 4 x 4 bed unit and tenure of intermediate rent. This is subject to the above planning obligation being met.</p> <p>Consultation</p> <p>Pre-application meeting with Grainger, Planners and Housing Commissioning, Investment and sites.</p> <p>CONCLUSION:</p> <p>The scheme in its current form complies with the Councils Strategic Policies, principally on the grounds that it promotes the area's regeneration. The site is within the Seven Sisters corridor, which is a priority area for change and has a strategic role to play in the growth of Haringey. The Council aspirations for this site are for a comprehensive mixed use development – Current SP1 and SP2 policies</p> <p>The Housing Commissioning, Investment and Sites team supports this scheme in terms of the proportion of affordable housing been delivered, as outlined above and will have continuous engagement with Grainger to ensure the Council's aims and objectives are met.</p>	
<p>LBH Head Of Carbon Management</p>	<p>My comments on the submitted strategies are:</p> <p>1) Energy (Overall) - The energy baseline for the development proposal would have emitted 221 tonnes of CO2 per year if building regulations compliant. The scheme is required to deliver a</p>	<p>Noted, carbon offsetting required through a S106. Conditions 21 and 22 imposed as recommended.</p>

Stakeholder	Question/Comment	Response
	<p>carbon saving of 35% or a new target emissions of 143.65 tonnes of CO2 per year. Following implementation of the Energy Hierarchy (London Plan Policy 5.2) the development delivers a new emissions figure of 158 tonnes of CO2 per year which is a shortfall of 15 tonnes. The development proposes to offset these emissions as set out in policy. As such the development will be expected to make a contribution of £40,500 towards carbon reduction projects within Haringey. This is based on the cost of £2,700 per tonne of carbon over 30 years.</p> <p>Action: Secure £40,500.00 towards carbon reduction projects within Haringey through s106 agreements for payment at commencement on site.</p> <p>2) Energy (Clean) – District energy networks are planned within the Tottenham Hale area which has the potential to link into the Seven Sisters area.</p> <p>We would expect that a single heating and hot water network served from a CHP lead energy centre heats all elements of this development. And that the proposed energy centre for this site is able to link and deliver heat into neighbouring schemes being brought forward (Wards Corner to the North and other housing sites to the South). With the tallest building in the area being Apex House the delivery of a flue through this building</p>	

Stakeholder	Question/Comment	Response
	<p>and a single energy centre serving the wider area would be beneficial. This wider network is expected through London Plan Policy and is needed to be able to be connected to area wide district energy networks at a later date. The Council will also require detail on how these connections will be made. This should include maps and technical specification.</p> <p>Action: Apex House is next to sites being brought forward (Wards Corner to the North and other housing sites to the South) by a similar design / developer team. The applicant should demonstrate how one energy centre for the area will be brought forward.</p> <p>Action: To identify and demonstrate of a floor plan a route from the energy centre to the public highway, that will be reserved for connectivity to the area wide network. This will need to address issues such as getting through the buildings foundations.</p> <p>Action: To condition the delivery of a single energy centre for the development providing all units with heating and hot water supply. This is as set out in Appendix C of the submitted Energy Strategy.</p> <p>Action: The applicant provides the operational details of the heat network (pressures and temperatures). The location of the energy centre and ensure that there is space for future heat exchangers should the network not be delivered at this time.</p>	

Stakeholder	Question/Comment	Response
	<p>3) Energy (Green) - The sustainability and energy statement sets out how the carbon reduction through renewable will be achieved on this scheme. The Council needs to ensure that the renewable technologies are delivered as designed. Space has been identified for 4 x 10m² solar PV panels (approximate 40m²) on the building. This delivers 1% improvement in energy needs through renewable technologies.</p> <p>Action: To condition the delivery of the energy measures set out in the design document Apex House: Energy Strategy (rev 2) By: Hoare Lea; Date: September 2015. This should include:</p> <ul style="list-style-type: none"> • The location of the energy centre and site wide heating network operations; • Route for connections to the energy centre (the area identified for the heat exchangers) from the public highway; • 40m² of solar PV on the roof of the development (as drawn in Appendix D of the Energy Statement). <p>Any alterations to this strategy should be submitted to the Council for approval prior to works.</p> <p>4) Overheating – The development will require to</p>	

Stakeholder	Question/Comment	Response
	<p>ensure that summer temperatures are kept to a minimum. The strategy submitted has very low rates of air permeability. While this is positive for energy usage, this increases the risk of overheating. This was highlighted as a key concern at the pre-application meeting on 17/6/15. At this meeting the Council asked to see a dynamic thermal model for the development. To ensure that the risk is managed through design.</p> <p>It was asked that the GLA's Design Summer Years for London (TM49: 2014) guide was used for this model. This guide aims to provide a risk-based approach to help developers and their advisers simultaneously address the challenges of developing in an urban heat island and managing an uncertain future climate. Therefore at present this scheme does not deliver policy 5.9 of the London Plan which requires major development to mitigate the impact of a changing climate.</p> <p>Design elements of the development including large windows and single aspect units are at high risk from overheating. The development needs to be designed, modelled and then interventions employed to manage the overheating risk. Only once all appropriate measures have been employed will air conditioning be expected to manage the overheating risk.</p> <p>This approach is also required through the EIA regulations. The EIA directive 2014/52/EU requires development to mitigate the impact of a changing climate</p>	

Stakeholder	Question/Comment	Response
	<p>– this includes overheating risk.</p> <p>Action: That a dynamic thermal model is undertaken on all aspects of the development. This model should use the future London weather pattern TM49. Overheating risk should be addressed and demonstrated through each stage of the London Cooling Hierarchy. At each stage progress should be demonstrated that improvement has been delivered until risk has been removed.</p>	
<p>LBH Conservation Officer</p>	<p>Background:</p> <p>This is a triangular site at the corner of Seven Sisters Road and Tottenham High Road and is adjacent to the Seven Sisters/Page Green conservation area, with only the clock tower included within it. The conservation area forms part of the Tottenham historic corridor which covers an extensive area, stretching approximately 3.7km between Enfield to the north and Stamford Hill to the south, to signify its importance as a Historic Corridor on the route of the Roman Ermine Street. The corridor is sub-divided into six conservation areas.</p> <p>The applicant as part of the application has submitted a detailed Design Statement and a Townscape, Heritage and Visual impact assessment. Whilst these are very well detailed in terms of the visual impact and long distance impact on the views of the conservation areas, it falls short of describing the impact of the scale of the development on its immediate vicinity. In this respect, I consider the Townscape, heritage and Visual Impact assessment and the Design and Access Statement to be</p>	<p>Noted</p>

Stakeholder	Question/Comment	Response
	<p>incomplete.</p> <p>Notwithstanding this, I have assessed the development from a conservation point of view, including where the applicant's statement is unclear or incomplete. In doing so, I have given regard to Council's statutory duty towards preserving or enhancing the conservation areas, listed buildings, non-designated heritage assets and their settings. I have also referred to the Council's adopted Tottenham High Road Conservation Area Appraisal (2009) and the Urban Characterisation Study (2015).</p> <p>The site and its context:</p> <p>The Seven Sisters Conservation Area is focussed on the section of the High Road surrounding Seven Sisters Station and includes Broad Lane and adjacent residential streets. Within this area, the High Road is at its busiest and most divisive, and the busy junctions with Broad Lane and West Green Road with Seven Sisters Road have a significant influence on the area's character. In addition, the main entrances to the Seven Sisters underground station on either side of the High Road add considerably to the volume of pedestrian traffic in this area.</p> <p>Seven Sisters has also been earmarked for cross rail which is likely to bring substantial investment and improvement to public transport that could transform the area and its character further to an important multi-nodal hub of public activities.</p>	

Stakeholder	Question/Comment	Response
	<p>The Council's own Urban Characterisation Study states - 'Opportunity to mark the important node (where Seven Sisters Road and the High Road meet) with an elegant, slim tower that can successfully mark this activity node. This tower could rise to circa 20 storeys but would need to form part of a lower rise (4-6 storeys) perimeter block and care would need to be taken to ensure wind vortices are not created around its base, negatively impacting upon the public space.' (November 2015, page 125)</p> <p>Opposite the site, Wards Corner has two approved schemes, one that replaces the existing buildings with a seven storey block, with the upper two storeys set back; and a more recent alternative approval that retains the building with conversion of upper floors. Neither of the approvals have been implemented. However, it is noted that the former planning application is also by the developers of the current site in question. Together, they would have a cumulative impact on the heritage assets and their setting and has been addressed as such in the applicant's submission.</p> <p>Immediately to the south is Seacole Court which is a three storey modern residential development and whilst in separate ownership, is likely to come forward for redevelopment in the future.</p> <p>It is important that the site is seen in context of the permitted and future development opportunities so that its impact can be assessed holistically.</p>	

Stakeholder	Question/Comment	Response
	<p>Assessment of significance:</p> <p>Seven Sisters/Page Green conservation area is primarily residential in use and Broad Lane and the surrounding streets are fronted by consistent terraces of Victorian dwellings, which provide the area with a degree of uniformity. Page Green Terrace, immediately opposite to the site, is set back from the Road behind screens of vegetation. The mature London Plane trees along this section of the High Road have a formative influence on the areas character and appearance.</p> <p>The building on site is a 1980s three storey brick building with a setback fourth floor. The building addresses the 'apex' of the site with a chamfered edge facing the junction and a clock tower in front of it. Architecturally, the building is of no merit and whilst of a scale reflective of its adjacent neighbours, it does little to contribute to the setting of the conservation area. Most importantly, it fails to identify this crucial node of retail, transport and public activity node. Given the future relevance of the site, the existing building fails to add to its townscape significance.</p> <p>Opposite the site, on the east side of High Road, just north of Page Green terrace is the Christ Apostolic Church: a two storey red brick building with white rendered detailing and prominent castellated turrets. The church building, which was originally constructed as a Salvation Army Citadel, is adjoined to the north by a single storey hall with a stepped gable. Both the church and the associated hall are local listed buildings of</p>	

Stakeholder	Question/Comment	Response
	<p>architectural and historic interest and make a positive contribution to the streetscene. Any development on site in question should assess impacts on the setting of these locally listed buildings.</p> <p>Further north, on east side of High Road, Nos. 220 to 224 High Road, (the former Barclay's Bank) is a Grade II listed building adjoining the south flank of Tesco's. It is a grand three storey corner building, with an additional attic storey with triple dormers with central segmental pediments within a tall slate roof. The classical red brick and sandstone building dates from 1902 and successfully defines the junction of High Road with Broad Lane. Proposed new development would have an impact on its setting and should be assessed appropriately.</p> <p>The edges of the site, facing the High Road and Seven Sisters Road interfaces with the established Victorian scale, detailing and massing established within the wider conservation area and any new development should address this appropriately. Any new development should be assessed on the basis of its impact on the Page Green Terrace, Nos 227-249 High Road (Wards Corner), the locally listed Apostolic Church, the statutorily listed Nos 220-224 High Road and the wider setting of the entire Historic Corridor, especially with respect to views from Tottenham Green and further north and south along the High Road. The development is also likely to have an impact on the setting of South Tottenham, Clyde Circus and St Ann's conservation areas along with long distance views from Bruce Castle Park and Alexandra</p>	

Stakeholder	Question/Comment	Response
	<p data-bbox="573 233 758 261">Palace Park.</p> <p data-bbox="573 305 888 332">Principle of demolition</p> <p data-bbox="573 376 1377 630">Given the building's limited or no contribution to the setting of the various heritage assets, there would be no objection to its demolition from a conservation point of view. Any future development should enhance the setting of the conservation and its wider context along with creating a strong townscape feature that would aptly highlight this important node and hub of public activities.</p> <p data-bbox="573 673 831 701">New development</p> <p data-bbox="573 745 1377 1252">The new development comprises a series of buildings in varying heights to a maximum of 23 storeys fronting the High Road. The height reduces to six and four storeys adjacent to Seacole Court. Additionally, the frontage on Seven Sisters Road is seven storeys with the upper two storeys set back, similar to one of the approved Wards Corner development. Along Stonebridge Road, the scheme proposes three storey townhouses. The proposed materials are predominantly brick, with some contrast in shades to break the massing and articulate the elevations. 'Individual bays of the elevation are articulated by panels of brickwork in which alternate courses are expressed' (Section 4.4, Design and Access Statement).</p> <p data-bbox="573 1256 905 1284">Principal of tall building</p> <p data-bbox="573 1328 1325 1399">From a townscape point of view, the principal of a tall building in the form of a 'point block' was already</p>	

Stakeholder	Question/Comment	Response
	<p>established as part of the Urban Characterisation Study undertaken by the Council, a draft of which was published in February 2015 and finalised in November 2015. Guidance from CABE (now Design Council) in this respect, suggests that 'Transport is important in relation to tall buildings because of the intensity of use, as well as density, that they represent' (Guidance on tall buildings, CABE and English Heritage, 2003). As such, location of tall buildings at important activity locations and transport hubs is justified but should be designed with careful consideration to its context.</p> <p>In terms of the historic environment, a tall structure at this location would undoubtedly have an impact on the setting of the various designated, non-designated heritage assets as well as their setting. A new guidance published by Historic England states- 'In the right place well-designed tall buildings can make a positive contribution to urban life. Past examples show us that they can be excellent works of architecture and some of the best post-war examples of tall buildings are now listed.'</p> <p>Based on the understanding of local context by the applicant, such as urban grain, significant views and materials along with the Council's own documents such as the Conservation Area appraisal and the Urban Characterisation Study, I agree that a tall building at this location could enhance the historic townscape of the area, anchoring the historic High Road to an important node that would be a pivotal hub of activities for this part of the borough.</p>	

Stakeholder	Question/Comment	Response
	<p data-bbox="573 269 1373 337">Impact of the tall building on the immediate setting of the conservation area</p> <p data-bbox="573 378 1373 667">Within the immediate setting the proposed scale and massing of the development would have an impact on the views and setting of the conservation area as well as the setting of the listed bank and the locally listed buildings. However, the shape of the block and elevation details means that the block would have differing levels of impact when viewed from different locations and distances.</p> <p data-bbox="573 708 1373 1289">At the base, the proposal would introduce a scale that is unprecedented within the existing scale of the conservation area. As such this would not be considered to preserve the setting of the conservation area or the listed and locally listed buildings and would cause some harm. However, at present, whilst an extremely prominent corner, the site has no significant architectural focal point and lacks 'legibility' and does not contribute to the setting of the heritage assets or the historic corridor. The new development would, by virtue of its scale and design, would create an anchor point on the High Road that would 'highlight' the pivotal node that Seven Sisters is likely to become in the future. As such this would be considered a significant heritage benefit that would overcome the less than substantial harm to the setting of these heritage assets.</p> <p data-bbox="573 1330 1283 1398">Along Seven Sisters Road, the impact of the north elevation facing the street is much larger in scale</p>	

Stakeholder	Question/Comment	Response
	<p>compared to the established three storeys terraces and blocks. Here, the development in my opinion would cause some harm to the setting of the Seven Sisters/Page Green as well as Clyde Circus conservation areas.</p> <p>In my view, this harm is mitigated by creating a seven storey block and setting back the upper two storeys- so that the structure recedes sharply from 23 storeys to an apparent height of five storeys (with the additional two storeys set behind). This transition creates a visual hierarchy with the established local townscape and is coherent with approved Wards Corner site, immediately opposite. The proposed materiality with contrasting palettes further articulates the facade. Overall, whilst the northern elevation would cause some harm to the setting of the conservation areas at its base, the transition in heights (including that established by the approved Wards Corner scheme) allows the impression that 'one is approaching an important node' creating an interesting townscape skyline that would ultimately enhance the setting of this part of the Seven Sisters/Page Green and Clyde Circus Conservation areas.</p> <p>The east elevation fronts the High Road and given its width and overall height, would perhaps have the most impact on the setting of Page Green terrace as well as the Victorian two storey terraces along Broad Lane within Seven Sisters/Page Green Conservation Area. These parts of the conservation area are relatively quiet and residential and the development introduces a scale that</p>	

Stakeholder	Question/Comment	Response
	<p>is undoubtedly out of this context. As such the development at this location, opposite Page Green terrace and from the backdrop of the terraces along broad Lane (View 05 in the applicant's statement) would cause harm to its setting. Given the width of the High Road opposite Page Green terrace and the distance of the main tower from Broad Lane and South Tottenham, this harm would be less than substantial.</p> <p>To mitigate this harm, the 'slab like appearance' of the block has been designed to appear as a cluster of blocks with contrasting materials and differing depths and heights. By playing with the heights, materials and depth, the resulting elevation would be that of a group of towers- emerging at a distance in a town centre node. The impact of the tower(s) on Page Green terrace would be further mitigated by the London Plane Trees along the High Road, as they would continue to be prominent within the immediate setting of the terrace. In addition, the townscape benefits, would overcome the less than substantial harm to the setting of these parts of the Seven Sister/Page Green Conservation Area.</p> <p>The west elevation is primarily an internal elevation. The elevation on Stonebridge Road is primarily that of a domestic scale with townhouses along it. The impact of this elevation on setting of the Seven Sister/Page Green and Clyde Circus conservation areas would be negligible and would be overcome by the townscape benefits of the scheme.</p> <p>Whilst the south elevation has not been discussed in the</p>	

Stakeholder	Question/Comment	Response
	<p>applicant's Design and Access Statement, it would only have a visual impact on the setting of South Tottenham Conservation Area. Given the distance, this would be negligible and would be overcome by the townscape benefits of the scheme.</p> <p>Impact of the tall building on the wider setting of the historic environment: including Historic High Road, Bruce Castle Park and Alexandra Palace Park</p> <p>The northern elevation, when viewed from the High Road looking south, appears slim and sleek and would enhance the setting of the conservation areas. The linear elevation of the tower at this edge provides a sharp frame, mainly in glass, resulting in an elegantly designed tall structure that enhances the setting of the Historic High Road. This is also appreciated in long distance views from further north, such as Tottenham Green and Bruce Grove conservation areas. It also creates a legible landmark at this important location, terminating the southern edge of the retail parade of the High Road which continues northwards along Tottenham Green and Bruce Grove. As such the proposal would enhance the setting of the historic corridor and the conservation areas along it.</p> <p>The block would also have a visual impact on the setting of the St Ann's and South Tottenham Conservation Areas. The tower would also be visible in long distance views from Bruce Castle Park and Alexandra Palace Park. However, given the distance this impact would be negligible and would be overcome by the townscape</p>	

Stakeholder	Question/Comment	Response
	<p>benefits of the scheme.</p> <p>Public realm</p> <p>At the base of the tower the public realm proposed as part of the development would also have a significant and potentially positive impact on the conservation area. Whilst high quality materials and landscaping would be pertinent, it is considered that the proposed public realm works are a vast improvement to the existing and would significantly enhance the setting of the conservation area at this junction.</p> <p>Conclusion</p> <p>The scale and massing of the proposed block would undoubtedly have an impact on the immediate setting of the heritage assets within its vicinity. It would also have visual impact on setting of the some neighbouring conservation areas including St Ann's, Bruce Castle Park and Alexandra Palace Park Conservation Areas. However, the building has been designed to a high quality, in particular the 'point block' nature of the north elevation appears an elegant structure within the skyline.</p> <p>At the base, the receding heights along Seven Sisters Road and the varying depths and heights of the block, creating a block of towers on the east elevation along High Road, mitigates the impact of the scale of the proposed structure. Additionally, the creation of a legible landmark to aptly anchor the High Road to an important node that would enhance the setting of the heritage assets would provide significant townscape and heritage</p>	

Stakeholder	Question/Comment	Response
	<p>benefits that would outweigh the less than substantial harm caused by the proposal.</p> <p>I conclude that overall, whilst the proposal would lead to less than substantial harm on the setting of heritage assets, the scheme would also lead to significant townscape and heritage benefits that would ultimately enhance their setting and outweigh this harm. In making this assessment, I have given great weight to the preservation or enhancement of the heritage assets as per the Council's statutory requirement. I consider the scheme acceptable from a conservation point of view subject to conditions on materials including those proposed for the public realm and landscaping.</p>	
<p>LBH Flood and Surface Water</p>	<p>We agree in principal to the conceptual proposal as stated on the Flows and Volumes pro-forma and contained within the email from Matthew Stevens dated 23/12/15 reference 1411/501/Mst.</p> <p>Progressing the site from a drainage perspective we would now like to in receipt of the detailed drawings and all supporting evidence so we can move from concept to full detail.</p> <p>Therefore the following conditions are recommended:</p> <p><u>Details to be submitted</u></p> <p>The development hereby permitted shall not be begun until details of the design, implementation, maintenance and management of the sustainable drainage scheme have been submitted to and approved in writing by the local planning authority in consultation with the</p>	<p>Noted conditions 23 and 24 attached to secure final details.</p>

Stakeholder	Question/Comment	Response
	<p data-bbox="573 233 1276 264">Environment Agency. Those details shall include:</p> <ul style="list-style-type: none"> <li data-bbox="617 310 1367 630">a) Information about the design storm period and intensity, discharge rates and volumes (both pre and post development), temporary storage facilities, means of access for maintenance, the methods employed to delay and control the surface water discharged from the site and the measures taken to prevent flooding and pollution of the receiving groundwater and/or surface waters; <li data-bbox="617 639 1356 813">b) Any works required off-site to ensure adequate discharge of surface water without causing flooding or pollution (which should include refurbishment of existing culverts and headwalls or removal of unused culverts where relevant); <li data-bbox="617 823 1352 886">c) Flood water exceedance routes, both on and off site; <li data-bbox="617 896 1220 927">d) A timetable for its implementation, and <li data-bbox="617 937 1373 1219">e) A management and maintenance plan for the lifetime of the development which shall include the arrangements for adoption by an appropriate public body or statutory undertaker, management and maintenance by a Residents' Management Company or any other arrangements to secure the operation of the sustainable drainage scheme throughout its lifetime. <p data-bbox="573 1260 1339 1362">Once approved, the scheme shall be implemented, retained, managed and maintained in accordance with the approved details.</p>	

Stakeholder	Question/Comment	Response
	<p>REASON: To prevent the increased risk of flooding, to improve and protect water quality, improve habitat and amenity, and ensure future maintenance of the surface water drainage system.</p> <p>Completion and Maintenance of Sustainable Drainage – Shown on Approved Plans No building or use hereby permitted shall be occupied or the use commenced until the sustainable drainage scheme for this site has been completed in accordance with the submitted details. The sustainable drainage scheme shall be managed and maintained thereafter in accordance with the agreed management and maintenance plan.</p> <p>Reason: To ensure that the principles of sustainable drainage are incorporated into this proposal and maintained thereafter.</p>	
<p>LBH Tree & Nature Conservation Manager</p>	<p>The proposed new layout would involve intrusions into the recommended root protection areas (RPAs) of T5, T6 and T10. In addition to the Arboricultural survey, an Arboricultural Impact Assessment should have been carried out to assess the implications of excavation works within the RPAs. London plane trees are tolerant to some root disturbance, but in the case of T6 and T10, the likely loss of roots will be significant and could have a detrimental impact on both trees. Their existing rooting areas will be reduced and roots will be damaged. These trees survived Apex House being built next them in the last 30-40 years, but the new development goes much closer to them. T6 and T10 would also require</p>	<p>Noted condition 5 attached requiring an AIA and condition 27 requiring replacement planting.</p>

Stakeholder	Question/Comment	Response
	<p>extensive pruning works to allow for access for the construction works. There will be very limited space to carry out the necessary construction works (e.g. erect scaffolding etc), without the trees being subject to significant pruning. The Arboricultural impact assessment condition needs to be robust and cover the above points. It needs to make reference to 'mitigating measures with regards to tree protection'</p> <p>Conditions must also be made to cover the drafting of a Tree protection plan, Arboricultural method statement, pre-commencement site meeting, etc</p> <p>The Arboricultural survey has identified that T5 has a fungal bracket of the Ganoderma applanatum decay fungi. In advanced stages of decay, this fungus can result in stem or root plate failure. As this is a large tree with a high risk target zone (immediately adjacent to the public highway), further investigation using decay detection equipment must be carried as soon as possible, to determine whether the tree may be retained. If extensive decay is identified, the tree must be removed.</p> <p>The only significant tree specified for removal is T2, a mature Poplar (<i>Populus nigra</i>), found to be in a fair condition and categorised as a B tree. It has previously been managed as a pollard and therefore will require regular cyclical pruning in the future. Poplars have a limited lifespan and I would estimate this one to have 20-40 years. It is clearly visible so would therefore likely merit a TPO. However, its removal could perhaps be</p>	

Stakeholder	Question/Comment	Response
	<p>justified, if 5 replacement trees of a large nursery size (18-20cm trunk circumference) were planted to mitigate its loss. This could be done outside of the site on the public highway, if space permits.</p> <p>Two of the trees (T6 and T10) merit TPO's as they are of significant amenity value and on council land that is being disposed of.</p>	
EXTERNAL		
London Underground	Satisfied that these works will not have a significant impact on London Underground (LU) assets as per details/plans provided and therefore LU has no further comment on the proposal.	Noted
Transport For London	<p>Site description The site is at the junction of the A10, High Road to the east and A503, Seven Sisters Road to the west with Stonebridge Road to the south. Both Seven Sisters Road and High Road form part of the Transport for London Road Network (TLRN) with Amhurst Park, 1km south of the site, the nearest part of the Strategic Road Network (SRN). Seven Sisters station is approximately 60m to the north of the site and provides access to Victoria line services and London Overground services between Liverpool Street and Cheshunt/Enfield Town. In addition South Tottenham station is located 250m to the south and provides access to services on the Overground – Gospel Oak to Barking line.. The area is served by 11 bus services (67, 349, 243, 318, 476, 149, 76, W4, 41, 259 & 279).Accordingly the site records an excellent Public Transport Accessibility Level (PTAL) rating of 6b, where 6 is the highest and 1 is</p>	Noted, condition 18 attached requiring a Construction Logistics Plan

Stakeholder	Question/Comment	Response
	<p>the lowest.</p> <p>Cycling Superhighway 1 (CS1), recently completed, will link this area with the City (terminating at Liverpool Street to the south). It will avoid major roads and will provide a new alternative route with improved cycling facilities.</p> <p>Car Parking</p> <p>Given the excellent PTAL rating of the site, TfL welcomes the 'car free' nature of the proposal. Nevertheless, Blue Badge parking would be required and it is supported that the applicant has undertaken a capacity study of the existing on street parking located on Stonebridge Road. This has shown that the average vacancy levels reach 30% and therefore it is proposed to convert 16 existing on street resident's bays to Blue Badge only. Due to space constraints on site TfL considers this provision acceptable in principle however the applicant should demonstrate the maximum distance a Blue Badge holder using these spaces would have to travel to access their residential core. In addition, 20% of the spaces should have electrical vehicle charging points with a further 20% fitted with passive provision. Finally, all residents should be exempt from applying for a local parking permit.</p> <p>Cycle Parking</p> <p>265 cycle spaces are proposed for the development exceeding London Plan (2015) standards. However, in line with the London Plan and London Cycle Design Standards (LCDS) residential and commercial parking should be separate to maximise their security. On that basis TfL would require five long-stay spaces to be</p>	

Stakeholder	Question/Comment	Response
	<p>separately allocated for office use.</p> <p>The LCDS set out the guidelines for cycle standards in London. In line with the LCDS the storage facilities would require revision. For access to cycle storage; external doors should be 2.2m wide with internal doors 1.2m wide; lifts for cycle storage should be 1.2m x 2.7m; storage rooms should involve passing through no more than two sets of doors All the above should be addressed to comply with TfL's guidelines. Moreover, it is outlined in the Design and Access Statement that there will be shower and changing facilities, this would be welcomed as it is in line with the LCDS, however, these facilities should be clearly outlined in the floor plan. TfL would expect these facilities to be available for all It is also accepted that different commercial uses should share facilities.</p> <p>Moreover, London Plan sets out that the applicant should provide short-stay parking for both residential and commercial use. Short-stay parking should be in a safe location in the public realm, preferably with shelter to protect cycles from the elements. TfL require four short-stay residential spaces with a further increase for commercial uses. As the proposal is flexible space TfL recommend taking the highest possible allocation at 21 spaces provided (A2/A3 1 space per 40 sqm) as the site is adjacent to Cycle Superhighway 1 and therefore it would be expected that there would be a heavy flow of cycle traffic in the vicinity. Short-stay parking would preferably be located on-site and in the public realm.</p>	

Stakeholder	Question/Comment	Response
	<p>Impact assessment The applicant has undertaken a multi-modal impact assessment using the TRICS database. TfL considers the adopted approach to be generally acceptable however there are some survey sites which would not have been considered appropriate due to their small size as this could distort the trip rates.</p> <p>Public transport Notwithstanding the above, TfL is satisfied that these proposals will not have a detrimental impact on the capacity of the local public transport network.</p> <p>Walking and Cycling As above, CS1 will run adjacent to the site and will deliver significant improvements to local walking and cycling facilities. Nevertheless, further discussion is required with the applicant to ensure that the proposed public realm does not conflict with the delivery of the CS1 works.</p> <p>Freight It is proposed that a service yard and two on street loading bays would facilitate the servicing arrangements. Refuse access would be via Stonebridge Road and the market would be serviced from Seven Sisters Road and Stonebridge Road. Whilst a detailed plan of the proposed bay on Seven Sisters Road has not been provided from the drawings provided to date the loading bay does not have adequate splay for large vehicles to enter and leave on this busy road. It is also not clear what provision has been made for pedestrians and</p>	

Stakeholder	Question/Comment	Response
	<p>cyclists to bypass the loading bay. TfL does not consider that the proposals present the best arrangement at this location and therefore object to the applicant's freight strategy. On that basis, more discussion is required with the applicant to agree an alternative solution.</p> <p>Fire access, and access (once every five years) to replace plant is proposed from The High Road. It is proposed that Fire Tenders would mount the footway and drive adjacent to the site. It should be noted that this would conflict with Cycle Superhighway 1 which offers a segregated cycle lane at this location. On that basis, more discussion is required with the applicant to understand the impact on the TLRN of this arrangement as again this may not be the appropriate location for fire access.</p> <p>In addition a full Delivery and Servicing Plan should be secured and provided prior to construction or demolition works commencing. Full details of how this can be produced can be found at: https://tfl.gov.uk/info-for/freight/planning/delivery-and-servicing-plans</p> <p>A Construction Logistics Plan should also be secured via condition in order to maintain the sustainable and safe construction of this development. This should be secured by condition prior to any works commencing on site. Vehicular routings will be important to minimise conflict with CS1. Details of how to produce a CLP can be found at: https://tfl.gov.uk/info-for/freight/planning/construction-logistics-plans</p>	

Stakeholder	Question/Comment	Response
	<p>Travel Planning The applicant has submitted a Framework Travel Plan (FTP) which TfL has assessed through the ATTrBuTE testing system. Whilst the FTP failed TfL's test, it is recognised that the Travel Plan is still at its early stages and the full Travel Plan will involve a much greater level of depth. TfL recommend that the full Travel Plan should contain detailed information of existing transport schemes in the area such as the extent of the cycling infrastructure in the region. Further details of how to produce a Travel Plan can be found at https://tfl.gov.uk/info-for/urban-planning-and-construction/travel-plans</p> <p>Mayoral CIL and Borough CIL As of 21st July 2014 LB Haringey adopted a Community Infrastructure Levy charging schedule. The site falls within the eastern charging zone which will incur a cost of £15 per sqm for residential developments. In addition, in accordance with London Plan policy 8.3, <i>Community Infrastructure Levy</i>, the Mayor commenced CIL charging for developments permitted on or after 1 April 2012. The relevant Mayoral charge is £35 per square metre Gross Internal Area (GIA) and further details can be found at: http://www.london.gov.uk/publication/mayoral-community-infrastructure-levy</p> <p>Summary The car free nature of the proposal is welcomed as it is in line with London Plan policies however Blue Badge</p>	

Stakeholder	Question/Comment	Response
	<p>parking access will need to be clarified. The quantum of cycle parking accords with the London Plan, however how it is allocated needs to be amended. More discussion is required with the applicant on the proposed servicing arrangement and how the public realm relates to TfL's CS1 works will need to be understood.</p> <p>Updated- 5th Feb:</p> <p>The location of the loading bay should be suitable. However, the size and restrictions should be detailed at a later date. I note that TfL's Road Space Management team request final judgement on any design on TLRN.</p>	
London Fire Brigade	The Brigade is satisfied with the proposal regarding Fire Brigade Access. Sprinklers are recommended.	Informative attached.
Designing Out Crime Officer	<p>I have no objection.</p> <p>There has been some consultation with the Architect and Developer regarding the Secured by Design standards and this would need to continue if a full award is sought. I request that Secured by Design (Sections 2 and 3, Part Compliance) be made a condition of any planning permission that may be granted. This will ensure that the Police preferred standards are used for the physical protection of the building and its occupants.</p>	Noted condition 8 attached requiring secured by design compliance.
Thames Water	<p>Waste Water</p> <p>Thames Water requests that the Applicant should incorporate within their proposal, protection to the property by installing for example, a non-return valve or other suitable device to avoid the risk of backflow at a later date, on the assumption that the sewerage network may surcharge to ground level during storm conditions.</p>	Noted condition 9 attached requiring a piling method statement.

Stakeholder	Question/Comment	Response
	<p>No impact piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement.</p> <p>Reason: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to impact on local underground sewerage utility infrastructure. The applicant is advised to contact Thames Water Developer Services on 0800 009 3921 to discuss the details of the piling method statement.</p> <p>'We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, testing and site remediation. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. Should the Local Planning Authority be minded to approve the planning application, Thames Water would like the following informative attached to the planning permission:"A Groundwater Risk Management Permit from Thames Water will be required for discharging</p>	

Stakeholder	Question/Comment	Response
	<p>groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 02035779483 or by emailing wwqriskmanagement@thameswater.co.uk. Application forms should be completed on line via www.thameswater.co.uk/wastewaterquality."</p> <p>A Trade Effluent Consent will be required for any Effluent discharge other than a 'Domestic Discharge'. Any discharge without this consent is illegal and may result in prosecution. (Domestic usage for example includes - toilets, showers, washbasins, baths, private swimming pools and canteens). Typical Trade Effluent processes include: - Laundrette/Laundry, PCB manufacture, commercial swimming pools, photographic/printing, food preparation, abattoir, farm wastes, vehicle washing, metal plating/finishing, cattle market wash down, chemical manufacture, treated cooling water and any other process which produces contaminated water. Pre-treatment, separate metering, sampling access etc, may be required before the Company can give its consent.</p> <p>Applications should be made at http://www.thameswater.co.uk/business/9993.htm or alternatively to Waste Water Quality, Crossness STW, Belvedere Road, Abbeywood, London. SE2 9AQ. Telephone: 020 3577 9200.</p>	

Stakeholder	Question/Comment	Response
	<p>Water Comments</p> <p>Thames Water recommend the following informative be attached to this planning permission. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.</p>	
<p>Historic England</p>	<p>The proposal is for the demolition of all buildings on site, none of which is historic, and their replacement with a residential led mixed use development reaching up to 22 storeys in height. The resulting structure will be a highly prominent tall building against a townscape of much lower scale.</p> <p>The proposed tall building's relationship to the historic quality of the Tottenham High Road is of particular concern. This Roman road is of such significance as an ancient thoroughfare that it constitutes what is thought to be London's longest continual stretch of Conservation Areas. These are broken down into parts along its length, but of immediate relevance to the present application are the 'Seven Sisters and Page Green', 'Tottenham Green' and 'South Tottenham High Road' Tottenham High Road Historic Corridor Conservation Areas.</p> <p>The National Planning Policy Framework 2012 (NPPF) obliges the consideration by your council of the impact of</p>	<p>Noted</p>

Stakeholder	Question/Comment	Response
	<p>this proposal on the setting of these conservation areas, and any other designated heritage assets within its zone of visual influence (Paragraphs 132 and 137).</p> <p>In doing so we would advise you to refer to our published guidance on the setting of heritage assets given in 'The Setting of Heritage Assets' (2015), and our advice note on 'Tall Buildings' (2015).</p> <p>There is a notable impact given in the Townscape, Heritage and Visual Impact Assessment as Local View 05 looking south from Broad Lane. This takes in Page Green Common, home to the seven trees thought to commemorate the eponymous Seven Sisters, a site which contributes to the significance of the Seven Sisters and Page Green conservation area.</p> <p>The attractive terrace of two storey houses seen across the Common also contributes to the quality and character of the area. The oblique angle from which the proposal will be seen shows the bulk of the building, and causes a harmful contrast in scale and character between the established historic environment, and the proposed new construction.</p> <p>According to the terms of the NPPF in order for this harmful impact to be justified there must be sufficient public benefits brought about by the proposals to outweigh the desirability of preserving the significance of the Conservation Area.</p> <p>Recommendation</p>	

Stakeholder	Question/Comment	Response
	<p>We would urge you to address the above issues, and recommend that the application should be determined in accordance with national and local policy guidance, and on the basis of your specialist conservation advice.</p>	
<p>Greater London Authority</p>	<p>The full response is set out in Appendix 5</p> <p>The response concludes:</p> <p>London Plan policies on retail and town centre uses, employment, housing, affordable housing, historic environment, urban design, inclusive design, transport and climate change are relevant to this application. The application complies with some of these policies but not with others, for the following reasons:</p> <ul style="list-style-type: none"> • Retail and town centre uses, employment: The loss of the existing office space and the provision of market or flexible commercial space is supported in principle. • Housing: The provision of residential use on the site is supported in principle. The Council should confirm that the proposed unit sizes meet local housing needs and secure Building Regulation M4(2) and M4(3) requirements by condition. Further work is required in some areas before such the density of the scheme can be considered acceptable. • Affordable housing: The Council's independent assessment of the applicant's financial viability assessment should be shared with GLA officers before it can be confirmed if this is acceptable. The Council should confirm that the provision of 	<p>Noted, issues raised in relation to layout and energy have now been resolved to officers satisfaction.</p>

Stakeholder	Question/Comment	Response
	<p>intermediate housing as the affordable offer is acceptable in this location. The applicant should provide further details on the proposed tenures.</p> <ul style="list-style-type: none"> • Historic environment: GLA officers do not consider that the proposals will cause harm to the significance of heritage assets. • Urban design: The applicant should reconsider the ground floor layout on the corner of Stonebridge Road and Seven Sisters Road; reconsider the ground floor layout of the High Road block; provide further details on the proposed management arrangements for the internal layout for the different use scenarios; provide further justification for the additional internal floorspace in place of external balconies on the courtyard side of the High Road building, and above level 6; and clarify contradictions between the area schedule and the drawings. • Inclusive design: The applicant should provide further detail on residential accessibility, wheelchair units, and site-wide accessibility. • Transport: The applicant should provide further detail on Blue Badge parking and cycle parking to wheelchair accessible units. The applicant should engage in further discussions with TfL to ensure that the proposed public realm works does not conflict with CS1 works. The indicative servicing proposals do not present the best arrangement and the applicant should engage in further discussions with TfL to agree an alternative solution. The proposal 	

Stakeholder	Question/Comment	Response
	<p>for fire tenders to mount the footway adjacent to the site would conflict with the operation of CS1 and the applicant should engage in further discussions with TfL on this subject.</p> <ul style="list-style-type: none"> • Climate change: Further information is required concerning the energy strategy for the site. The carbon dioxide savings fall short of the target within Policy 5.2 of the London Plan and the applicant should consider the scope for additional measures aimed at achieving further carbon reductions. <p>On balance, the application does not yet comply with the London Plan, for the reasons set out above; however the possible remedies set out above could address these deficiencies.</p>	
NEIGHBOURING PROPERTIES		
Tottenham CAAC	<p>We believe that it will be extremely detrimental to the character of the High Road Historic Corridor. It will be overbearing in size and height, overlooking many nearby residential properties of a more traditional scale.</p> <p>It is not architecturally distinguished enough for this location, and hence does not offer the regeneration value that we would hope for.</p> <p>It does not present a coherent response to the other buildings in the vicinity.</p> <p>Therefore we ask that this application be rejected and the applicant to reconsider a more sensitive scheme for the</p>	

Stakeholder	Question/Comment	Response
<p>Page Green Residents Association</p>	<p>Site</p> <p>Overshadowing in the morning to the Stonebridge Estate and adjoin streets and in the evening to Page Green. Breach of UK legislation on rights to light A daylight and sunlight study should be carried out by an accredited surveyor Overlooking to Seacole Court flats and gardens Out of character with the surrounding neighbouring at seven times taller than the surrounding neighbourhood The applicant carried out consultations procedures but has not captured, engaged or reported these objections The images provide distort the appearance of the building</p>	
<p>Local Representations</p>	<p>Design and appearance Will overshadow and be out of keeping with the Page Green Conservation Area</p> <p>Excessive and not in keeping with the area No inkeeping with the traditional character of the area The materials and design is not in keeping with the area 22 storeys is not appropriate for the area Scale and massing is out of character with the area Proposal should be more in keeping with the height of the Lawrence Road development The building is too tall The height should be limited to that of the adjoining buildings Even is tastefully design the height of the building would be an eyesore There are no other tall buildings in the area The building would dominate the surrounding area</p>	<p>The impact on the page green Conservation is set out in paras 6.4.33 and 34 above.</p> <p>The design is considered under heading 3.5 above, it is acknowledged that the proposed building would be taller than its surrounds and would contrast with the existing development, however the site has been identified as suitable for a tall building in the emerging DM Policies and AAP and the urban characterisation study. The design and materials are considered to be high quality which references the surrounding development while providing a contrasting modern landmark building.</p> <p>The emerging DM Policy identifies this site</p>

Stakeholder	Question/Comment	Response
	<p>Will set a precedent for further large scale development in the area</p> <p>The existing building could be modernised and renovated</p> <p>The proposal will dominate the skyline Will harm the surrounding skyline The proposal does not provide a gateway to Tottenham</p> <p>The building is slender to the front but a slab when viewed from the side</p> <p>The development should be more sensitive to its context in scale and massing with a more interesting architectural language The brick finish would be brick slips rather than real bricks</p> <p>The grey colour with look like brushed metal on a sunny but make the tower stand out on a rainy day The design is appropriate to central London not Seven Sisters</p> <p>The first Wards corner development was refused as 7</p>	<p>as the only site suitable for a tall building in this area so a precedent would not be set.</p> <p>Retaining the exiting building would not provide the benefits of the proposed development</p> <p>The townscape impact is considered in paras 6.5.11 – 18, the proposal will have a profound impact on the surrounding area but will enhance the legibility of the area.</p> <p>Concerns around the massing are noted and addressed in paras 6.5.24 -26. The design is intended as a contrasting landmark, the architecture is considered to be visually interesting.</p> <p>Noted</p> <p>Condition 2 requires the submission of materials to ensure they retain the quality of the design</p> <p>The design is considered appropriate as a landmark for the area</p> <p>The site has a larger setting than Wards Corner as identified in the urban</p>

Stakeholder	Question/Comment	Response
	<p>storeys was considered too high therefore this proposal cannot be considered acceptable</p> <p>Impact on surrounding Listed Buildings</p> <p>The proposal contravene the council's and national design policies The height should be reduced before any scheme is approved</p> <p>The cladding panels are not in line with the local area</p> <p>Quality of the development itself The building is not sustainable</p> <p>High density accommodation has proved unsuccessful in the past</p> <p>The quality of accommodation is poor with little outside space</p> <p>The 4 townhouses proposed will not get any morning sun</p> <p>Many residences have no balcony at the lower levels</p>	<p>characterisation study</p> <p>As set out in paras 6.4.31-32 the impact on listed buildings is considered to be negligible The proposal is considered to comply with national and local policy A height reduction is not considered necessary as the design is considered to be acceptable The proposal provides a modern contrasting design</p> <p>The proposal as followed the GLA guidelines and achieves a good level of sustainability with an offsetting contribution to achieve policy compliance. High density development above the London Plan guidelines is accepted due to the sites proximity to public transport</p> <p>The proposal provides child playspace, balconies and communal amenity spaces in excess of the london Plan requirements. Noted, the overall standard of accommodation in these dwellings is considered to be acceptable Internal balconies have been provided to the lower properties to mitigate against noise and pollution from the surrounding traffic</p>

Stakeholder	Question/Comment	Response
	<p>Concerns in relation to Wards Corner Market Objection to the removal of the existing Wards Corner Market This allows the closure of Wards Corner Market which is unlikely to survive such a move as the rents would increase to market rents after 18 months</p> <p>This is a prime site sold for £3.4 million in a closed secret deal The market will revert to the usual high street retailers as soon as the market is driven out.</p> <p>Impact on neighbours and the surrounding area Loss of privacy</p> <p>Will block out natural light The Loss of Light and shadow will, risk of crime in the area, risk of illness ,low mood and psychological impact and risk a negative impact on the health The proposal would overshadow the proposed development of Wards Corner The proposal will cause illegal overshadowing and loss of light</p> <p>Loss of a view of the sky</p> <p>The effect on the wind will make the surrounding area unpleasant The wind report concludes that there would be a degradation in the environmental conditions as a result of the tower The proposal will create a wind tunnel effect</p>	<p>This has been considered and accepted under the application for the Wards Corner site</p> <p>This is not material to the consideration of this application This is not material to the consideration of this application</p> <p>The impact on privacy is considered in paras 6.8.33 – 36 In terms of daylight the most significant impact is minor adverse which is considered acceptable</p> <p>The loss of a private view is not a material planning consideration The wind impact on assessed in paras 6.8.20 – 31 and the effects can be mitigated to an acceptable level</p> <p>Noise during construction would be a</p>

Stakeholder	Question/Comment	Response
	<p>Noise during construction works Noise and disturbance during construction Existing trees will be removed and this will impact on air quality. The building will impact on TV and radio reception</p> <p>Impact on local services Impact on infrastructure such as transport, GPs and schools</p> <p>Objection to the closer of the existing council office and move the Marcus Garvey Library</p> <p>Nothing beneficial to the local community</p> <p>Transportation concerns Lack of parking in the area The increase in cars will lead to pollution in the area Impact on crowding at Seven Sister Station Increase in heavy goods vehicles during construction will harm road safety</p> <p>Affordable housing concerns The proposal does not meet the current planning requirement of 50% affordable housing</p>	<p>temporary impact and controlled through environmental health legislation Only 1 existing trees will be removed and 5 replacements have been conditioned Television and radio signals are now digital so less affected by interference, the proposal is unlikely to have significant impact on analogue radio reception</p> <p>The Council's CIL charges provide contributions towards the impact on infrastructure including schools. The move of the services to the Marcus Garvey Library is not a consideration of this application As set out in the report the proposal would bring regeneration and economic benefits and affordable housing.</p> <p>The proposal would be car free other than disabled parking so will not impact on parking and traffic in the area. The impact of construction traffic would be a temporary impact and a condition impose to reduce the impact on the surrounding highways network</p> <p>The alterations to the Strategic Polices DPD, considered by Full Council in November, propose reducing this requirement to 40% and a viability report has been provided an independently reviewed</p>

Stakeholder	Question/Comment	Response
	<p>Will not be affordable for local people No social housing The affordable flats will be 80% of market rent and not genuinely affordable It is suggested that social or council housing is not a priority for Tottenham however there are more than 5,00 children living in temporary accommodation in Haringey if they remain in temporary care they suffer a significant financial penalty to themselves and the welfare bill as well as additional problems Social housing should be a priority for Tottenham and should be required as part of this scheme Object to the proposal for 109 units for private rented housing which is unaffordable to 50% of the local population</p> <p>Concerns around regeneration and impact on the area Shows no respect to the history and social dynamics of the area The proposal will help rich developers get richer</p> <p>There is no certainty that Grainger's proposal for Wards Corner will take place and there is an approved restoration plan The building is designed for business people who want easy access to London and will not contribute to the community The proposal should provide regeneration whilst being in keeping with the Page Green Conservation Area This type of building would not be allowed in other</p>	<p>to support the provision proposed The Council's Housing Team have advised that there are currently high levels of social rented housing in the Tottenham constituency wards. In order to balance the levels and promote the area's regeneration, the team seek higher proportions of market sale/rental and intermediate housing in this part of the borough. In line with policy the proposal provides the maximum reasonable amount of affordable housing.</p> <p>Noted</p> <p>This is not a material planning consideration Noted</p> <p>This is not a material planning consideration</p> <p>The proposal is considered to achieve these objectives The site occupies a unique location within</p>

Stakeholder	Question/Comment	Response
	<p>conservation areas within Haringey</p> <p>Moving the Council offices would impact on existing employment as there are no guarantees that all current staff would keep their existing jobs The area needs long term jobs</p> <p>Other issues Residents have not be adequately consulted</p> <p>Loss of property values Loss of the existing beech tree The applicant should not have been used when their relationship with the Council is not impartial.</p> <p>The foundations will impact on Crossrail 2 provision</p> <p>The proposal will risk impacting on the Victoria Line Underground Line.</p> <p>The proposal would demolish the existing clock tower and toilets without a replacement local landmark</p> <p>The proposed public space will be locked for portions of the day creating a sense of a gated community and widening social division</p> <p>The consultation responses have be ignored</p> <p>The materials presented deliberately and grossly</p>	<p>the borough identified as suitable for a tall building The AAP accepts the loss of the existing office and replacement with a residential led mixed use scheme which will provide some replacement employment floorspace</p> <p>Consultation has been carried out in accordance with the Council's SOCI This is not a material planning consideration This is not a material planning consideration</p> <p>The site is not within the safeguard area for Crossrail 2 London Underground have been consulted and raised no objection subject to a condition in relation to piling The proposal will provide a landmark building which will provide heritage benefit by replacing the existing buildings The proposed courtyard will be open to the public during the day and closed at night for security, along the High Road there will be increased public space and outdoor seating areas throughout the day Not all feedback from consultation can be accommodated in any development proposal The views and visualisations provided are in accordance with standard practise and considered to be accurate enough to</p>

Stakeholder	Question/Comment	Response
	<p>misrepresent the development's size and scale Documents provide have inaccuracies and omissions</p> <p>Support The Development will add value to the area and much needed regeneration Support this needed project and regeneration An attractive addition to London's housing stock and skyline Areas near transport interchanges should have very high density levels A much needed piece of regeneration for the borough creating homes of private rent -the fastest growing tenure of housing in London The applicant's history as a landlord for over 100 years offers confidence that these homes for rent will be professionally managed. If this scheme was refused and then built for sale, those flats would likely be sold off to foreign buyers and rented locally without the coherent, singular point of management being proposed. The scheme is wholly policy compliant with the GLA's rules and standards around space, height and design While the council has a responsibility to listen to local views it has a bigger responsibility to consider what the best course of action of for the future residents too: those people who want to live in the area or who want to benefit from transport links. would like to see a greater mix of younger people able to live in the borough and for more new development which will help improve the public realm, reduce crime and enhance the local amenities</p>	<p>assess the proposal</p> <p>Noted</p>

Stakeholder	Question/Comment	Response
	<p>The proposal makes provision for a potential relocation of the Seven Sisters Market into purpose-built accommodation and would in any event stimulate footfall within the Market to the benefit of the 40 SME local businesses which the Market houses and the 100 or so livelihoods they support</p> <p>The commercial space proposed is wholly-appropriate for the Market and</p>	

