

**ADDENDUM  
PLANNING SUB COMMITTEE  
18 JULY 2023**

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Addendum Report

Planning Sub Committee 18 July 2023

UPDATE FOR CONSIDERATION AT PLANNING SUB-COMMITTEE Item No.

<b>Reference No:</b> HGY/2022/2116	Ward: Hornsey
<b>Address:</b> Hornsey Police Station, 98, Tottenham Lane, London, N8 7EJ	
<b>Proposal:</b> Retention of existing Police Station building (Block A) with internal refurbishment, rear extensions and loft conversions to create 6 terrace houses and 4 flats. Erection of two buildings comprising of Block C along Glebe Road and Harold Road to create 8 flats and erection of Block B along Tottenham Lane and towards the rear of Tottenham Lane to create 7 flats and 4 mews houses including landscaping and other associated works	

*[To note: the numbering as set out in this addendum corresponds with the numbering of each section within the Officers committee report]*

### 3.2 Site and Surroundings

Paragraph 3.2.4 is amended (in bold) to correct the sentence as follows:

The Police Station is not statutorily or locally listed but it is located within the Hillfield Conservation Area **which also includes all the properties on Harold Road, but no other properties or spaces on Tottenham Lane, Church Lane or Glebe Road.** The site is also located within a 'Critical Drainage Area'

### 5. LOCAL REPRESENTATIONS

2 further objections have been received which have raised a number of points. Most of these points have already been considered in the officers report. The additional points raised are listed below, as follows:

- The height of the mews houses should be re-considered
- Increased congestion
- Electric vehicle charging points should be considered (Officer comment- as the parking is on street EV charging cannot be provided by this application).

1 further support has been received from the Council for British Archaeology (CBA). The additional points raised are listed below, as follows:

- Happy to see the former police station will be retained and reused
- The proposal will conserve its historic character and significance
- The proposal will minimize the carbon cost of the development
- It would be good to see some interpretation which indicates the buildings former use incorporated into the development to maximise

the public benefits of the scheme and retain some of the former police station's communal and evidential value such as an external name plaque or historic photos as decorative elements within communal areas.

ADDITIONAL CONDITIONS INCLUDED

**[Condition 32 is included to ensure new developments minimise the use of mains water]**

The dwelling(s) shall be constructed to meet as a minimum the higher Building Regulation standard Part G for water consumption limited to 110 litres per person per day using the fittings approach.

Reason: The site is in an area of serious water stress requiring water efficiency opportunities to be maximised; to mitigate the impacts of climate change; in the interests of sustainability; and to use natural resources prudently in accordance with the NPPF.

ADDITIONAL INFORMATIVES:

**[An additional informative is included to encourage water efficiency]**

Developers are encouraged to maximise the water efficiency of the development. Thames Water offer environmental discounts for water efficient development which reduce the connection charges for new residential properties. Further information on these discounts can be found at: <https://www.thameswater.co.uk/developers/charges>

**To address the point raised by the Council for British Archaeology**

The applicant shall consider incorporating indication of the buildings former use into the development to retain some of the former police station's communal and evidential value such as an external name plaque or historic photos as decorative elements within communal areas

<b>NEIGHBOURING PROPERTIES</b>		
<p><b>3 further letter received</b></p>	<p>The height of the mews houses should be re-considered</p> <p>Increased congestion</p> <p>Electric vehicle charging points should be considered</p> <p>Happy to see the former police station will be retained and reused</p> <p>The proposal will conserve its historic character and significance</p> <p>The proposal will minimize the carbon cost of the development</p> <p>It would be good to see some interpretation which indicates the buildings former use incorporated into the development to maximise the public benefits of the scheme and retain some of the former police station's communal and evidential</p>	<p>From a design point of view, the proposed scale of the mews houses is considered acceptable in line with the relevant policies</p> <p>The Transportation Officer has assessed these points and which have been covered in the main body of the report and concludes that the proposed development is considered acceptable, in regard to transport impacts</p> <p>Comments noted</p> <p>Comments noted</p> <p>Comments noted</p> <p>Comment noted and informative included</p>

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	value such as an external name plaque or historic photos as decorative elements within communal areas.	
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## ADDENDUM REPORT

### 1. APPLICATION DETAILS

**Reference No:** HGY/2022/0563

**Ward:** Northumberland Park

**Address:** The Goods Yard and The Depot, 36 & 44-52 White Hart Lane (and land to the rear) and 867-879 High Road (and land to the rear), London, N17 8EY.

**Proposal:** Full planning application for (i) the demolition of existing buildings and structures, site clearance and the redevelopment of the site for a residential-led, mixed- use development comprising residential units (C3); flexible commercial, business, community, retail and service uses (Class E); hard and soft landscaping; associated parking; and associated works. (ii) Change of use of No. 52 White Hart Lane from residential (C3) to a flexible retail (Class E) (iii) Change of use of No. 867-869 High Road to residential (C3) use.

**Applicant:** Goods Yard Tottenham Limited.

### ADDITIONAL OBJECTIONS AND CONSULATION RESPONSES

**TFL-** No significant objections to the principle of the proposed development. However further information and conditions or Section 106 obligations are required in relation to the above matters to make the development acceptable in transport terms. (Officer note- *A bus contribution was not agreed or justified as being necessary as part of the S106 for the Appeal Scheme*)

**Met Police –** No objections to the proposal subject to conditions (already included in the report).

#### **Haringey Cycling campaign-**

There were no apparent improvements to the cycle parking or changes to cycle routes in the amended drawings, so HCC's objection and comments remain as submitted. (Officer note- *the proposal provides a safe North - South cycle route through the site and transportation officers are satisfied with the cycle provision*)

### REPORT CORRECTIONS AND CLARIFICATIONS

#### **Para 1.2 bullet point 5**

The scheme would deliver a mix of dwelling sizes, including family sized homes and including ~~97~~ **99** Low Cost Rented homes and ~~184~~ 193 Shared Ownership homes, representing a ~~33~~ **35%** provision of affordable housing by unit number and 36% provision by habitable room.

#### **Para 2.4 S106 Heads of Term 9 Car Capping**

- Prohibiting residents (other than Blue Badge holders) from obtaining a permit

- to park in the CPZ
- ~~£4,000~~ **£5,000** for revising the associated Traffic Management Order.

**Para 2.4 S106 Heads of Term 11 Residential & Commercial Travel Plans:**

- Appointment of a Travel Plan Coordinator (to also be responsible for monitoring Delivery Servicing Plan).
- Provision of welcome induction packs containing public transport and cycling/walking information, map and timetables to every new household.
- ~~£3,000~~ **£10,000** for monitoring of Travel Plan initiatives
- future versions should have regard to the adopted Walking and Cycling Action Plan to ensure walking and cycling targets and measures align with the Borough's aspirations.

**Para 2.4 S106 Heads of Term 12 Car Club:**

- Establishment or operation of a Car Club Scheme.
- Minimum of 4 x Car Club spaces (with actual number tbc following discussions with prospective operators).
- 2 years' free membership for all households and £50 per year credit for the first 2 years
- a mechanism whereby demand for car club bays will be reviewed on a regular basis and any additional demand be satisfied through the reallocation of other car parking spaces at ground-floor level.

**Para 3.2 bullet point v**

~~In the absence of a legal agreement securing financial contributions towards social infrastructure provision (community space, library and publicly accessible open space), the proposed scheme would (1) fail to meet the requirements for a Fast Track application as set out in London Plan Policy H5 and would require a Financial Viability Appraisal to justify the proposed amount and type of affordable housing; and (2) fail to make a proportionate contribution towards the costs of providing the infrastructure needed to support the comprehensive development of Site Allocation NT5. As such, the proposals are contrary to London Plan Policy DF1, Strategic Policies SP16 and SP17, Tottenham Area Action Plan Policies AAP1, AAP11~~

In the absence of a legal agreement securing the public benefits of the scheme (including affordable housing, potential contribution to Love Lane Estate regeneration, ~~financial contributions towards social infrastructure provision~~, reduction to carbon dioxide emissions and local employment and training), the proposed scheme would lead to 'less than substantial harm' to heritage assets that would not be outweighed by public benefits, contrary to NPPF paragraph 196, London Plan Policy HC1, Strategic Policy SP12, Policy AAP5, AAP Site Allocation NT5 and DPD Policy DM9.

**Para 3.3**

This application was initially submitted in an effort to address the reasons for refusal but was not progressed to a decision at that time. Following the appeal decision, ~~fire~~



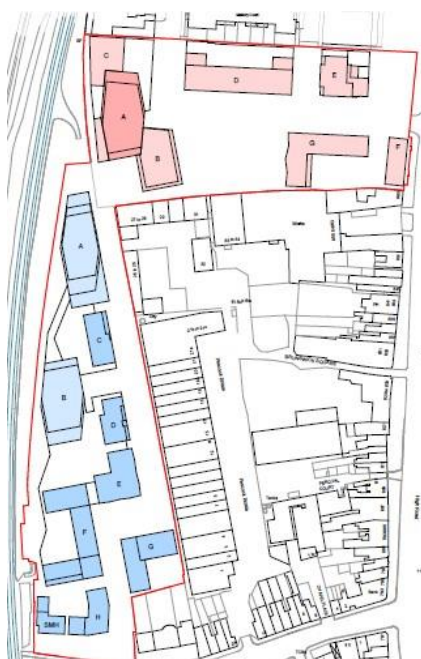
regulations and guidance changed **the Government has consulted on new regulations requiring second staircases for tall buildings, and the Mayor of London has made a statement that all planning applications which involve residential buildings over 30 metres in height will need to provide two staircases before Stage 2 referral to the Mayor** which meant that the scheme, as originally submitted, would not be able to comply with **new and emerging** requirements relating to fire safety. In line with latest **and emerging** fire safety regulations and guidance and in consultation with the Health and Safety Executive (HSE) amendments were made to the scheme which includes alterations (mostly internal) to provide additional lifts, secondary stair cores necessitating corresponding changes to internal layouts.

**Para 3.23**

The Goods Yard comprises mainly of a hardstanding area formed following its temporary use as a construction compound for stadium development. It is ~~currently~~ was, until September 2022, also used temporarily for car parking to support the safe return of fans to live games under restricted capacities .

**Para 3.5** - The proposal contributes approximately **£440,000** more in infrastructure provision through the increase in CIL rates since the previous decision.

**Corrected Figure 1**



**Table 5 – UPDATE GY and DEPOT FLOOR SPACE FIGURES**

Aspect of Development	Extant Depot scheme (HGY/2021/177 1)	Good Yards and Depot Appeal Scheme	Proposed scheme

	Extant Goods Yard Scheme (HGY/2018/0187)Both of which are incorporated into the parameters of the Lendlease High Road West Scheme (HGY/2021/3175)	(HGY/2021/1771)	
Total Residential floorspace (inc basement)	11,180sqm ( <del>4,800sqm GY and 1,250 D</del> ) <b>53,000 sqm (31,000 GY and 22,418 D)</b>	77,758	78,737 (GY 46,117 and D 32,620) sqm
Residential Units	Up to 646 (316 GY and 330 D)	867	844 (GY 493 and D 351)
Of which are affordable housing	126 (based on illustrative schemes) (35% by habitable room rising to 40% subject to grant funding)	297 (35.9% by habitable room rising to 40% subject to grant funding)	292 (35.93% by habitable room rising to 40% subject to grant funding)
		one bed 238 (27%) two bed 482 (55.6%) three bed 136 (15.7%) four bed 11 (1.3%)	One bed 243 (39%) Two bed 426 (50.5%) ) Three bed 165 (19.5%) ) Four

			bed 10 (1%)
Non-residential (commercial/amenity floorspace)	Up to 1,720sqm (1,450sqm GY and 270 sqm Depot)	1,870sqm	2,068 sqm
Open space	11,180sqm (4,800sqm GY/ 6,380 D)	15,650sqm	15,630 sqm
Play Space	Up to 2,610sqm (1,360sqm GY and 1,250sqm D)	2,900sqm	2,900sqm
Maximum Building Heights	GY 24 storeys D 29 Storeys	GY Block A 32 storey  D Block A 29 storey	GY Block A 32 storey  Depot Block A 29 Storeys

**Para 4.17.**

During the application process, ~~fire regulations and guidance changed the~~ **Government has consulted on new regulations requiring second staircases for tall buildings, and the Mayor of London has made a statement that all planning applications which involve residential buildings over 30 metres in height will need to provide two staircases before Stage 2 referral to the Mayor** which meant that the scheme, as originally submitted, would not be able to comply with new and emerging requirements relating to fire safety.

**Para 5.5** The main issues raised in representations from adjoining occupiers on the scheme as originally submitted are summarised below. Objections:

- The proposed Depot Block A would be closer to the existing River Apartments than previously approved **under HGY/2019/2929 and HGY/2018/0187** (approx. 33m rather than approx. 50m) and also more directly south – not in accordance with the HRMF.

- **Concerns about the closeness of the basement development to River Apartments.**

- Noise Impact Assessment does not take account of existing noise **such as from the railway line**

- Adverse impact on daylight, sunlight, overshadowing and privacy of residents of other residents.

Para 5.6 The following issues raised are not material planning considerations:

- Loss of view

**Para 6.3.14** The proposed scheme includes 2,068sqm (GEA) of flexible commercial uses (Class E) approximately ~~2,00~~ **200**sqm more than proposed in the appeal scheme.

**Para 6.3.35** The amount of proposed non-residential commercial uses in the proposed scheme (2,040 sqm GIA) is slightly more than in the previous consents (up to 1,887sqm GIA) and, subject to a planning condition, the same minimum 400sqm industrial uses (**Class E g (i), (ii) or (iii)**) would be secured.

**Para 6.3.36** Although there would 23 less dwellings than the extant **appeal** permission, **the proposal delivers more housing than the previous consents**. In-principle support remains for additional housing, with new London Plan housing targets, Housing Delivery Test measures and changes to the NPPF all strengthening the policy requirement for additional homes.

**Table 7**

Tenure	Units	% of Total
Private	552	65%
Affordable	292	35%
Total	844	100%

**Table 10**

	1-bed	2-bed	3-bed	4-bed	Total
Market	16	10	10	0	36
Low-Cost Rent	3	5	3	0	11
Intermediate	12	<del>17</del> <b>18</b>	9	0	<del>38</del> <b>39</b>
	31	<del>32</del> <b>33</b>	22	0	<del>84</del> <b>86</b> (10.2%)

**Para 6.5.4 6.5.4**

...the CABE / English Heritage “Guidance on Tall Buildings” 2007 (since superseded in 2015 & **2022**). DM6 part C sets out detailed policy requirements for tall buildings; being in an area identified as suitable, represent a landmark by which its distinctiveness acts as a wayfinder or marker, is elegant and well proportioned, visually interesting when viewed from any direction, positively engage with the street environment, consider impact on ecology and microclimate, going onto requiring where tall buildings are in close proximity to each other they avoid a canyon effect, consider their cumulative impact, avoid coalescence and collectively contribute to the vision and strategic objectives for

**Para 6.5.13 ii**

... ~~The block has been set back a further 3-7 metres from the shared boundary with the Rivers Apartments building when compared to the scheme allowed at appeal (reference HGY/2021/1771).~~ **The 5 storey Depot Block B (the block closest to Rivers Apartments) is in an identical position to allowed appeal scheme (HGY/2021/1771). Depot Block A has been moved further south (away from Rivers Apartments) than the appeal scheme positioning.** See Figure 02 below.

**Para 6.5.13 Bullet 1**

The tower (**Deport Block A**) has been set ~~3-7~~ **1** meters further back from Riverside Apartments than the Depot and Goods Yard Scheme approved at appeal (reference HGY/2021/1771)

**Para 6.5.13 Bullet 4** The lower portion of the proposed tower base and shoulder blocks are 5-stories (reducing the amount of mass and façade immediately facing the lower 7 floors of Rivers Apartments, than compared to consented Depot Scheme (~~HGY/2021/3175~~)(**HGY/2021/1771**))

**Para 6.5.20** Proposed Depot Block B would be between 6 and 7 metres from northern boundary with the existing Peacock Industrial Estate, to enable a one-sided narrow route in the interim condition (with the proposed building being in a similar position to an approved building in the extant consent for the Depot). The applicant's illustrative masterplan shows a new building on a redeveloped Peacock Industrial Estate being off-set by a similar amount, giving a separation distance of between ~~6~~ **12** and 14 metres. Given the use and layout of proposed Block B (commercial use on the ground floor and dual aspect flats with primary living room windows looking east and west above), the proposed northern square and Peacock Park and its likely extension further south, this proposed future relationship is considered acceptable. This proposed relationship, which is exactly the same as allowed for in appeal permission ~~HGY/2021/3175~~ (**HGY/2021/1771**).

**Para 6.5.25** The proposed scheme includes provision for ~~15,630~~ **15,553**sqm of open space, comprising **8,608 sqm** publicly accessible open space, **6,945sqm** communal residential courtyards and podium gardens and public realm (neighbourhood streets and lanes). This excludes private amenity space in the form of private balconies and terraces for individual homes. **The open space quantum is the same as allowed appeal scheme (HGY/2021/1771) but a slight increase to amount of open space per unit, since 23 less dwellings are proposed.** The site measures 2.5ha, or 21.3% of the Site Allocation NT5 area (11.69ha). The proposed provision of ~~15,630~~ **15,553**sqm of open space amounts to 39.5% of the overall area called for in the HRWMF and so would provide nearly twice as much open space as is proportionate to its size.

**Para 6.5.26** In terms of publicly accessible open space, the proposed scheme includes provision of ~~8,870~~ **8,608**sqm (including public realm areas).

**Para 6.5.27**

...The proposed ~~0.89~~ **0.86**ha (8,870 ~~8,608~~sqm) is approx. 30% of the amount of publicly accessible open space that policy calls for (approx. 50% if the lower need is applied). Officers consider that, given the generous on- site provision of communal residential amenity space (see Residential Quality) and the overall benefits of the scheme, the amount of proposed on-site publicly accessible open space is optimised. ~~Given this, officers consider that there would be a shortfall in the provision of publicly accessible open space.~~

**Para 6.5.40**

... as set out in the CABE/English Heritage “Guidance on Tall Buildings” (2007 since superseded in 2015 **& 2022**).

Table 13:

Proposed	Fall back Position – Extant Consented Appeal Scheme (HGY/2021/1771)		Fall-back Position – Extant Consented Schemes (HGY/2018/0187 &HGY/2019/2929		
Heights ('full' details)	New Block	Heights ('full' details)	New Block	Heights ('Full' details & 'Outline' maximums)	HRWMF Indicative heights
Goods Yard					
<del>26</del> <b>27</b> to 32-storeys (97.33 to 114.23m AOD)	A	<del>26</del> <b>27</b> to 32-storeys (97.33 to 114.23m AOD)	A1/A2 /B1	Part 8, 6 & 21-storeys (41.5/35.5/84.5m AOD)	10-18-storeys
<del>21</del> <b>22</b> to 27-storeys (79.33 <del>82.33</del> to 98.03 <del>97.93</del> m AOD)	B	21 to 27-storeys (79.33 to 98.03 <del>97.73</del> m AOD)	B2/C1/ C2	Part 7/18/7-storeys (39/75.5/40m AOD)	10-18-storeys

Proposed	Fall back Position – Extant Consented Appeal Scheme (HGY/2021/1771)		Fall-back Position – Extant Consented Schemes			
New Block	Heights ('full' details)	New Block	Heights ('full' details)	New Block	Heights ('Full' details & 'Outline' maximums)	HRWMF Indicative heights
C	6-storeys (34.33m)	C	6-storeys	B3	3-storey (33m)	

	AOD)		(34.33 m AOD)		AOD)	
D	6-storeys (34.33m AOD)	D	6- storeys (34.33 m AOD)	C4	5-storey (34m AOD)	3
E	7-storeys (37.63m AOD)	E	7-storeys (37.63m AOD)	C3	5-storey (34m AOD)	3
F	4 to 6- storeys (28.33 to <del>36.43</del> <b>33.23</b> m AOD)	F	4 to 7-storeys (28.33 to 36.43m AOD)	C3/D 1/ D2	Part 5/4/3- storeys (34/28.55/25.55m AOD)	3
G	4 to 5- storeys (32.72 <del>29.73</del> <b>29.73</b> m to 39.64 <b>32.72</b> m AOD)	G	4 to 5-storeys ( <del>32.72</del> <b>29.73</b> m to 39.64 <b>32.72</b> m AOD)	E1	5-storey (31.5m AOD)	3
H	3-storeys (24.19 <b>23</b> m AOD)	H	3-storeys (24.19 <b>23</b> m AOD)	F1/F2	2-storey (20.15/22.75m AOD)	3
The Depot						
A	23 to 29- storeys (84.60 to 104.00 <b>103.20</b> m AOD)	A	23 to 29-storeys (84.60 to <del>104.00</del> <b>103.20</b> m AOD)	B	29-storeys (106m AOD)	
B	9-storeys (42.60m AOD)	B	9-storeys (42.60m AOD)	A2	3 to 9-storeys (22m to 43m AOD)	5
C	5-storeys (32.40 <b>50</b> m AOD)	C	5-storeys (32.40 <b>50</b> m AOD)	C	Part 1, 7 & 9-storeys (19/37/43m AOD)	5
D	Part 5 to 6- storeys (32.70m AOD)	D	Part 5 to 6-storeys (32.70m AOD)	D	Part 5 to 6-storeys (29.65m to 32.70m AOD)	5
E	4 to 6- storeys (26.70 to 32.60m AOD)	E	4 to 6-storeys (26.70 to 32.60m AOD)	E	Part 1, 4 & 6-storeys (19/28/34m AOD)	5
G	3 to 6- storeys (24.71 to 35.19m AOD)	G	3 to 6-storeys (24.71 to 35.19m AOD)	G	Part 3/4/5 & 6- storeys (24.70m/27.36m/30. 25m AOD)	3

**Para 6.5.54 bullet 2** Policy DM6 (D) (a) requires tall buildings within close proximity to each other to avoid a canyon effect.

The proposed tall buildings would essentially be in a line approx. ~~30-35m~~ **19.5m to 33m** apart and there should be no canyon effect in a north-south direction...

### Para 6.5.54 bullet 3

... The applicant's DAS includes an assessment which demonstrates that there would be no overlap of the proposed towers for ~~58~~ **65.5%** of directions around the site, with 2 x towers overlapping in ~~19.5~~ **17%** of locations (north-west, north-east, south-west and south-east) and 3 x towers overlapping in ~~22.5~~ **17.5%** of locations (north-east and south-west).

### 6.5.85 Fall-back Position:

Compared to the existing consent for the site (HGY/2021/1771)

- Layout and location of towers - **The layout and location of the proposed towers is similar to the consented appeal scheme.**
- Relationship with existing and proposed development – **The proposed buildings would have a similar relationship with Cannon Road, albeit Depot Block would be located approximately 1 metre further south than the previously consented scheme.**
- Location, amount and type of open space - **The proposal includes the same quantum of open space but a reduced number of dwellings increasing the amount of open space per home from 18.1 square metres in the consented appeal scheme to 18.5 square metres per home.**
- Tall buildings – **The proposal results in the same degree of coalescence between the towers with no overlap in 65.5% of directions around the sit, with 2 x towers overlapping in 17% of locations (north-west, north-east, south-west and south-east) and 3 x towers overlapping i 17.5% of locations (north-east and south-west).**
- Townscape and visual effects – **Result in similarly high quality design in close , mid range and long views.**
- Inclusive Design and Secured by design – **Provide similarly accessible and secure design quality with proportionate amount of accessible homes.**

Table 6.64

	1-bed	2-bed	3-bed	4-bed	Total
Market	4 <b>16</b>	34 <b>10</b>	14 <b>10</b>	0	<b>36-52 (10%)</b>
Low-Cost Rent	4 <b>3</b>	4 <b>5</b>	3 <b>3</b>	0	11 <b>(10%)</b>
Intermediate	7 <b>12</b>	13 <b>18</b>	4 <b>9</b>	0	<b>39-24 (11%)</b>
	15 <b>31</b>	50 <b>33</b>	21 <b>22</b>	0	<b>86-87 (10.2%)</b>

**Para 6.6.9** Most of the proposed homes (54 **59.6%**) would be at least dual aspect. The majority of single aspect homes would be east and west facing, with no north facing. There would be a small number (**22 27**) of south-facing homes, but these



have been designed to avoid overheating (see Energy, Climate Change & Sustainability).

**Para 6.6.33** An approach to s106 financial contributions to address the AAP site-specific infrastructure requirements was considered as part of the appeal in to what is now the extant Goods Yard consent (HGY/2018/0187) **and Goods Yard and Depot Consent (HGY/2022/0563)**, however the increase CIL rate will now secure equivalent contributions to local infrastructure.

**Para 6.6.37**

...Subject to using CIL in this way, officers agree with the ES assessment that the proposed scheme would have a Negligible effect on school health provision.

**Para 6.6.40** Fall-back position. The proposed park on the Depot part of the site is approx. 300sqm larger than the park in illustrative scheme for the extant Depot consent (HGY/2018/0187) **but similar to the consented appeal scheme (HGY/2022/0563)**. The development context has changed since planning permission was granted for the Goods Yard and Depot scheme (**HGY/2022/0563**), with Lendlease's scheme for approx. 2,615 new homes across Site Allocation NT5 having been granted planning permission (HGY/2021/3175).

**Para 6.7.3**

... This generates an overall need for 2,6011sqm of play space. The GLA find the play space quantum proposed (2,900 sqm) to be in accordance with London Plan Policy S4.

**Para 6.8.49** Fall-back Position. **The application scheme proposes similarly scaled buildings to those approved as part of appeal scheme HGY/2021/1771, albeit with Depot Block A being located 1 metre further to the south, a lighter materials palette and minor façade treatment alterations to respond to internal layout changes made necessary though emerging fire safety requirements.**

**Para 6.8.51** additional paragraph **The proposal is considered to result in a similar level of harm to allowed appeal scheme HGY/2021/1771. The proposal provides the following benefits above the allowed appeal scheme:**

- **Providing a scheme which fully addresses emerging fire safety requirements, including through the introduction of second staircore which was not included in the Appeal Scheme, and satisfying the requirements of a statutory consultee in the HSE.**
- **Providing 28 more family homes (175 total compared to 147 in the Appeal Scheme) whilst retaining a consistent percentage of (policy compliant) affordable housing.**
- **Delivering a consistent quantum of open space and play space, despite a modest reduction in the number of units from 867 to 844.**
- **Moving Depot Block A 1 metre further away from the nearest residential properties at the Rivers Apartments to the north, which provides a slightly better neighbour amenity environment.**

- **Relocation of the basement access ramp further south through the enlarged basement, which improved the public realm and circulation in the site.**

**Table 20** Total trips and net increase in person trips (over and above consented schemes HGY/2018/0187 and HGY/2019/2929). **In respect to consented scheme HGY/2021/1771 the proposal results in 1 additional inbound AM peak bus trip.**

#### **Para 6.11.9**

~~... As this development is proposing to connect to a Decentralised Energy Network, this officer assessment reports on carbon emissions with SAP2012/ SAP 10 carbon factors.~~

#### **Para 6.11.10**

'Be Lean.' The proposed scheme adopts a 'fabric first' approach, including façade configuration and specification that balances the desire to have winter passive solar gains but avoid summer overheating; high performance glazing, reduced air permeability and good insulating fabric, use of high-efficiency mechanical ventilation and heat recovery, use of LED lighting and efficient cooling for the proposed commercial units. Following revisions to the elevations of the proposed towers, these proposed measures are expected to **reduce save 90.3 tonnes of carbon dioxide emissions by 11% per year based on the previous calculations (a site-wide 11% saving above the under Building Regulations Part L 2013). Revised calculations have not been undertaken for Part L 2021 to demonstrate performance under Be Lean. It is expected that t**The minimum carbon reduction of **10% is met by the domestic and 15%** is met by the non-domestic floorspace **when the full remodeling is submitted as part of a pre-commencement planning conditions.** ~~The residential fabric minimum reduction of 10%, called for in London Plan Policy SI 2 is also met.~~

#### **Para 6.11.11**

'Be Clean.' The applicant is intending to connect directly to the Energetik Heat Network, using heat generated at an Energy Centre located to the north east of the site on the Edmonton Eco-Park close the North London Waste Authority Energy Recovery Facility (ERF). The ERF is currently under construction, and will provide low carbon heat when it comes on stream in 2025/26. This is advance of the proposed ERF becoming operational, so initially heat would be supplied back-up gas boilers at the Energetik Energy Centre, with the energy source being switched from gas to lower carbon heat from waste as soon as the ERF is operational. Connection to the proposed DEN **was** expected to save 635 tonnes of carbon dioxide per year **( a 74% saving) according to the previous calculations (a 74% saving above under the Building Regulations Part L 2013).**

#### **Para 6.11.13**

'Be Green.' Photovoltaic (PV) arrays are proposed for the majority of new buildings across the site with a capacity of 228 kWp, amounting to approx. 1,005 sqm. The proposed PV panels ~~are~~ **was previously** anticipated to save 83.7 tonnes of carbon dioxide per year (an 8% saving above the Building Regulations 2013).

#### Para 6.11.14

~~Overall – 'Lean', 'Clean' and 'Green'. Table 22 below set out the overall carbon emission savings for Block A which have been remodeled under the revised Building Regulations Part L 2021 (with SAP10.2 carbon factors). These do not include the design changes and provide an indication on how the rest of the scheme should perform compared the performance under Part L 2013. The previous scheme under HGY/2021/1771 showed an estimated site-wide carbon reduction of 64% under Part L 2013 (with SAP2012 carbon factors).~~

~~Table 22: Site wide regulated carbon dioxide emissions savings (based on SAP2012 emission factors)~~

**Para 6.11.30** Fall-back Position. The proposed scheme is similar to the Goods Yard and Depot schemes approved by the extant consents in terms of energy strategy (communal heating, connection to the proposed North Tottenham DEN and incorporation of PVs). The estimated overall carbon savings for the proposed scheme of 79% over Building Regulations (~~2021~~2013) (~~SAP2012 carbon factors~~) **for the residential and 42% for the commercial elements** compares favourably with those achieved for the consented Goods Yard and Depot schemes, although direct comparison is not straight forward due to differences in SAP calculations **and that revised calculations are only for Block A and do not reflect the design changes**. It is not possible to meaningfully compare overheating outcomes for proposed and consented schemes.

#### Para 6.14.6

The scale and massing of the proposed buildings is similar to that of Goods Yard and Depot Scheme (~~HGY/2021/1771~~HGY/2021/3175) **which was similarly found acceptable**.

#### Para 6.20.1

.... **Planning Gateway One requires a Fire Statement to be submitted for proposals, which involve one or more 'relevant buildings'. In addition, planning gateway one established the Health & Safety Executive (HSE) as a statutory consultee for proposals relating to 'relevant buildings'. The proposed building would be greater than 18 metres in height and would have 7 storeys. Therefore, in line with planning gateway one, the proposed building would constitute a 'relevant building' and a Fire Statement is required.**

On 23 December 2022 DLUHC published a consultation on fire safety matters, including single staircases, which proposes to change the existing regulatory context and approach. The consultation proposes that a second staircase may be required for new residential buildings more than 30 metres tall as part of Building Control 'Approved Document B' requirements. It is expected the government will come to a final position on this matter later in the year and then, if introduced, there would be a transitional period to allow for schemes to be completed before coming into effect.

On 8 February 2023 the Mayor of London advised that this meant that residential buildings over 30m in height would be required to include a second staircase.

#### Para 6.20.3

... Whilst the scale and layout of buildings is similar to consent HGY/2021/1771, the permission pre-dates latest guidance, **statements** and **emerging** regulations on fire safety.

**Para 6.21.7** Fall-back Position Goods Yard and Depot Appeal Consent (HGY/2021/3175 **HGY/2021/1771**)

#### Para 6.22.4

The affordable housing offer is based on a Fast Track approach (not supported by a Financial Viability Appraisal) of 35.93% affordable homes (by habitable rooms, raising to 40% with grant), split ~~60:40~~ **40:60** Low Cost Rent and Shared Ownership.

**Para 6.22.6** The overall dwelling mix, at ~~21.5~~ **20.5%** 3 and 4-bed homes is considered acceptable and 10% of homes of various sizes would be 'wheelchair accessible'.

#### Para 7.1.1

Based on the information given on the plans, the Mayoral CIL would be **£3,682,534** and based on the current Haringey CIL charge rate for the Eastern Planning Sub-Committee Report Zone of ~~£15~~ **£53.46** per square metre, the Haringey CIL charge would be **£2,919,648**, giving a total of **£6,602,182**-These are net figures and take into account social housing relief.

## Appendix 1- Additional Consultation response

Thank you for consulting TfL. The site is located directly adjacent to the A1010 High Road, which forms part of the Strategic Road Network (SRN). White Hart Lane station (London Overground and Greater Anglia services) is located immediately to the south of the site. While the Local Planning Authority is the Highway Authority for the A1010, TfL is the Traffic Authority and has a duty under the Traffic Management Act 2004 to ensure that any development does not have an adverse impact on the SRN. In addition, TfL is concerned about any proposal which may affect TfL Assets and/or bus operations and infrastructure on the A1010 High Road/White Hart Lane and London Overground (LO) infrastructure/operations. We also have an overriding remit to secure compliance/delivery of the transport policies in the London Plan and the Mayor's Transport Strategy.

Please note that the following comments represent the view of Transport for London (TfL) and are made entirely on a 'without prejudice' basis. They should not be taken to represent an indication of any subsequent Mayoral decision in relation to a planning application based on the proposed scheme. In addition, these comments do not necessarily represent the views of the GLA.

After reviewing the updated application documents, specifically the 'Transport Assessment Addendum' TfL make the following comments. These are additional to any responses you may have previously received from my colleagues in infrastructure or asset protection and from TfL as a party with a property interest. Please also note that these comments should be read in conjunction with TfL's detailed comments made on 1st June 2022.

- It is understood that the scheme changes are driven by the Health and Safety Executive (HSE) and GLA requirements on fire safety matters. These changes have resulted in internal and external design updates being necessary to achieve compliance in this regard
- As previously indicated, all cycle parking is required to be designed and laid out in accordance with the London Cycling Design Standards (LCDS). TfL is concerned about the reconfiguration and enlargement of the basement for the Goods Yard buildings in terms of potential non-compliance with some parts of the LCDS to accommodate all long stay cycle parking. Points of concern are related to the quality of cycle parking, specifically the layout and corridor width of cycle parking facilities for Block B which comprise four separate cycle stores. Of particular concern is the access route for users to cycle parking spaces located at the top end of this cycle parking provision, as people pushing cycles have to negotiate an unacceptably narrow access corridor. To reduce the risk of obstruction within this corridor, including any obstructions caused by other users loading their bicycles on top-tier racks and/or other nuisance, an absolute minimum aisle width of 2500mm beyond the lowered frame is required. This is also required for two-tier racks to be usable

- Whilst the revised scheme retains the overall number of residential dwellings of the consented scheme across both The Goods Yard and Depot buildings, the residential mix/specific number of dwellings along with the commercial floor area, have been amended. Additionally, TfL acknowledges the applicant's commitment to meet accessibility standards and standards for future adaptation of the new homes. Notwithstanding this and the fact that adjustments to the proposed mix are generally modest, I would like to draw to your attention to the greater proportion of family housing, specifically in the context of the cycle parking provision, considering that achieving the best quality of provision is important to help more children and older people to cycle, as set out by the LCDS
- Further to the above, the LCDS is also clear that not everyone (e.g. Children in 0-4 and 5-11 age groups, adults aged 65+, disabled residents, etc) can use two-tier racks, and that more accessible cycle parking stands should be provided for such users. Therefore, TfL's original recommendation to provide a minimum of 20% Sheffield stands or at least to increase the total number of accessible cycle parking stands to respond to a greater proportion of family housing, remains unchanged in line with the need to take account of all user needs and consider disadvantage riders. Signs to show which spaces are intended for larger cycles may be needed to discourage others from parking there
- TfL encourages the applicant's team to re-examine the trade-offs made in the design and planning process with a view to exploring further opportunities to:
  - (i) rationalise existing car parking spaces for the Goods Yard buildings;
  - (ii) enhance cycle accessibility for all users within the basement; and
  - (iii) reconsider the priority given to motorised vehicles over cyclists.

Therefore, clarity should be provided on the proposed modifications made to the basement, specifically those related to the new pedestrian and cycle arrangements and commentary provided as to why such adjustments have been made. Further thought is needed to assess opportunities/the viability of a one-way circulation car park in order to improve the buildings' internal pedestrian and cycle access routes, in particular for Block's B cycle stores

- Considering the increased number of long stay cycle parking spaces now located within the proposed basement, TfL seeks clarification in terms of how all cycle parking, served by lifts can continue to be accessed by all users, including non-standard cycle users, in the event of individual lifts or lifts breaking down
- Full consideration of the implications of the proposed reconfiguration of the basement and deficiencies linked to excessive number of internal doors, which need to be negotiated by users of bicycles, should be incorporated. TfL expect the applicant to commit with the provision of push-button controls to assist with door opening

- With regard to car parking, TfL would like to remind the applicant that the London Plan policy T6 requires 20% of residential parking to be fitted with active electric vehicle charging infrastructure, with passive provision for all remaining spaces. Furthermore, all operational parking for the non-residential element should make this provision, including offering rapid charging
- TfL's overall position on trip generation, highway and public transport impact remains unchanged. Consequently, TfL requires a financial contribution towards bus service improvements to accommodate the net new demand and mitigate the cumulative impacts of development. Whilst it is recognised that adjustments to the proposed housing mix are modest, this contribution, which is consistent with other development in the local area, should reflect the additional bus trips
- TfL's requirement for Stage 1 Road Safety Audits (RSA) remains unchanged. The scope of these audits should include the southern access route, including the proposed parallel loading bay situated to the south of Neighbourhood Square and the relocated basement car park access ramp, and shared surface access route of the Goods Yard

As such, TfL has no significant objections to the principle of the proposed development. However further information and conditions or Section 106 obligations are required in relation to the above matters to make the development acceptable in transport terms.

**Appendix 2 Conditions and informatives**

Additional informative-

Details of hard landscaping submitted pursuant to this planning permission are to be agreed in consultation with the Metropolitan Police as appropriate”.