NOTICE OF MEETING

PLANNING SUB COMMITTEE

Thursday, 17th March, 2022, 7.00 pm - Tottenham Town Hall, Town Hall Approach Road, London, N15 4RY (watch the live meeting here, watch the recording here)

Members: Councillors Sarah Williams (Chair), Sheila Peacock (Vice-Chair), Gina Adamou, Dhiren Basu, Luke Cawley-Harrison, Emine Ibrahim, Peter Mitchell, Liz Morris, Reg Rice, Viv Ross, and Yvonne Say.

Quorum: 3

1. FILMING AT MEETINGS

Please note this meeting may be filmed or recorded by the Council for live or subsequent broadcast via the Council's internet site or by anyone attending the meeting using any communication method. Although we ask members of the public recording, filming or reporting on the meeting not to include the public seating areas, members of the public attending the meeting should be aware that we cannot guarantee that they will not be filmed or recorded by others attending the meeting. Members of the public participating in the meeting (e.g. making deputations, asking questions, making oral protests) should be aware that they are likely to be filmed, recorded or reported on. By entering the meeting room and using the public seating area, you are consenting to being filmed and to the possible use of those images and sound recordings.

The Chair of the meeting has the discretion to terminate or suspend filming or recording, if in his or her opinion continuation of the filming, recording or reporting would disrupt or prejudice the proceedings, infringe the rights of any individual, or may lead to the breach of a legal obligation by the Council.

2. PLANNING PROTOCOL

The Planning Committee abides by the Council's Planning Protocol 2017. A factsheet covering some of the key points within the protocol as well as some of the context for Haringey's planning process is provided alongside the agenda pack available to the public at each meeting as well as on the Haringey Planning Committee webpage.

The planning system manages the use and development of land and buildings. The overall aim of the system is to ensure a balance between enabling development to take place and conserving and protecting the environment and local amenities. Planning can also help tackle climate change and overall seeks to create better public places for people to live,

work and play. It is important that the public understand that the committee makes planning decisions in this context. These decisions are rarely simple and often involve balancing competing priorities. Councillors and officers have a duty to ensure that the public are consulted, involved and where possible, understand the decisions being made.

Neither the number of objectors or supporters nor the extent of their opposition or support are of themselves material planning considerations.

The Planning Committee is held as a meeting in public and not a public meeting. The right to speak from the floor is agreed beforehand in consultation with officers and the Chair. Any interruptions from the public may mean that the Chamber needs to be cleared.

3. APOLOGIES

To receive any apologies for absence.

4. URGENT BUSINESS

The Chair will consider the admission of any late items of urgent business. Late items will be considered under the agenda item where they appear. New items will be dealt with at item 10 below.

5. DECLARATIONS OF INTEREST

A member with a disclosable pecuniary interest or a prejudicial interest in a matter who attends a meeting of the authority at which the matter is considered:

(i) must disclose the interest at the start of the meeting or when the interest becomes apparent, and
(ii) may not participate in any discussion or vote on the matter and must withdraw from the meeting room.

A member who discloses at a meeting a disclosable pecuniary interest which is not registered in the Register of Members' Interests or the subject of a pending notification must notify the Monitoring Officer of the interest within 28 days of the disclosure.

Disclosable pecuniary interests, personal interests and prejudicial interests are defined at Paragraphs 5-7 and Appendix A of the Members' Code of Conduct

6. PLANNING APPLICATIONS

In accordance with the Sub Committee's protocol for hearing representations; when the recommendation is to grant planning permission, two objectors may be given up to 6 minutes (divided between them) to make representations. Where the recommendation is to refuse planning permission, the applicant

and supporters will be allowed to address the Committee. For items considered previously by the Committee and deferred, where the recommendation is to grant permission, one objector may be given up to 3 minutes to make representations.

7. HGY/2021/3175 - HIGH ROAD WEST, N17 (PAGES 1 - 402)

Proposal: Hybrid Planning application seeking permission for:

1) Outline component comprising demolition of existing buildings and creation of new mixed-use development including residential (Use Class C3), commercial, business & service (Use Class E), leisure (Use Class E), community uses (Use Class F1/F2), and Sui Generis uses together with creation of new public square, park & associated access, parking, and public realm works with matters of layout, scale, appearance, landscaping, and access within the site reserved for subsequent approval; and

2) Detailed component comprising Plot A including demolition of existing buildings and creation of new residential floorspace (Use Class C3) together with landscaping, parking, and other associated works.

Recommendation: GRANT

Conditions to follow.

8. PRE-APPLICATION BRIEFINGS

The following items are pre-application presentations to the Planning Sub-Committee and discussion of proposals.

Notwithstanding that this is a formal meeting of the Sub-Committee, no decision will be taken on the following items and any subsequent applications will be the subject of a report to a future meeting of the Sub-Committee in accordance with standard procedures.

The provisions of the Localism Act 2011 specifically provide that a Councillor should not be regarded as having a closed mind simply because they previously did or said something that, directly or indirectly, indicated what view they might take in relation to any particular matter. Pre-application briefings provide the opportunity for Members to raise queries and identify any concerns about proposals.

The Members' Code of Conduct and the Planning Protocol 2016 continue to apply for pre-application meeting proposals even though Members will not be exercising the statutory function of determining an application. Members should nevertheless ensure that they are not seen to pre-determine or close their mind to any such proposal otherwise they will be precluded from participating in determining the application or leave any decision in which they have subsequently participated open to challenge.

9. PPA/2020/0012 - TANGMERE AND NORTHOLT BLOCKS, STAPLEFORD NORTH BLOCK, ENTERPRISE CENTRE, MEDICAL CENTRE, FORMER MOSELLE SCHOOL AND SURROUNDING PUBLIC REALM AREAS, BROADWATER FARM ESTATE, TOTTENHAM, N17 (PAGES 403 - 430)

Proposal: Redevelopment of part of the Broadwater Farm Estate including demolition of existing buildings and the erection of buildings of up to nine storeys in height to provide 294 new homes; improvements to the public realm; provision of replacement and new commercial and community space; new landscaping and play space; and provision of an Urban Design Framework for the wider Estate.

10. NEW ITEMS OF URGENT BUSINESS

11. DATE OF NEXT MEETING

To note the date of the next meeting as 6 June 2022 (provisional).

Fiona Rae, Acting Committees Manager
Tel – 020 8489 3541
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Fiona Alderman
Head of Legal & Governance (Monitoring Officer)
George Meehan House, 294 High Road, Wood Green, N22 8JZ

Wednesday, 09 March 2022

Agenda Item 7

Planning Sub Committee Item No.

REPORT FOR CONSIDERATION AT PLANNING SUB-COMMITTEE

1. APPLICATION DETAILS

Reference No: HGY/2021/3175 **Ward:** Northumberland Park

Address: High Road West N17

Proposal: Hybrid Planning application seeking permission for:

1) Outline component comprising demolition of existing buildings and creation of new mixed-use development including residential (Use Class C3), commercial, business & service (Use Class E), leisure (Use Class E), community uses (Use Class F1/F2), and Sui Generis uses together with creation of new public square, park & associated access, parking, and public realm works with matters of layout, scale, appearance, landscaping, and access within the site reserved for subsequent approval; and

2) Detailed component comprising Plot A including demolition of existing buildings and creation of new residential floorspace (Use Class C3) together with landscaping, parking, and other associated works

Outline:

- Demolition of most buildings (with retention of some listed & locally listed heritage assets);
- New buildings at a range of heights including tall buildings;
- Up to 2,869 new homes in addition to Plot A (including affordable housing);
- At least 7,225sqm of commercial, office, retail, & community uses (incl. new library & learning centre);
- New public park (min 5,300sqm) & new public square (min 3,500sqm); &
- Other landscaped public realm and pedestrian & cycle routes

Detailed:

Plot A - Demolition of 100 Whitehall Street & Whitehall & Tenterden Community Centre and erection of new buildings of 5-6 storeys containing 60 new affordable homes & open space.

Applicant: Lendlease (High Road West) Limited

Ownership: Private and Council

Case Officer Contact: Philip Elliott

Site Visit Date: 04/02/2022

Date received: 08/11/2021 **Last amended date:** 01/02/2022

Plans and Document: See **Appendix 10** to this report.

1.1 The application has been referred to the Planning Sub-Committee for determination as the planning application is a major application, on Council owned land, that is also subject to a s106 legal agreement.

1.2 The planning application has been referred to the Mayor of London as it meets Categories 1A ,1B, 1C and 3A as set out in the Town and Country Planning (Mayor of London) Order 2008.

SUMMARY OF KEY REASONS FOR RECOMMENDATION

- The proposal is a well-designed, comprehensive, residential-led mixed-use scheme providing up to 2,929 homes (including 60 affordable homes in the detailed element), at least 7,225 sqm (GIA) of commercial space, including a new library and learning centre, a new public park measuring at least 5,300 sqm and a new public square measuring at least 3,500 square metres alongside other landscaped public realm and pedestrian/cycle routes equating to at least 0.4 hectares.
- The development would make a significant contribution to the regeneration and place-making of Tottenham including improved connectivity to White Hart Lane Station, improved public realm, creation of new public open spaces, creation of training, up-skilling and employment opportunities, support local business and community wealth-building through increased footfall and associated spending and support the diversification of the local economy.
- The scheme would deliver up to 1,025 affordable homes, including up to 564 Social Rented Homes and 461 Shared Ownership Homes. The illustrative scheme would deliver a mix of dwelling sizes, including family sized homes and including 500 Social Rented homes and 416 Shared Ownership homes. The affordable housing provision represents a 35% provision of affordable housing by unit number and 40% provision by habitable room with a tenure split of 55% social rent and 45% intermediate. This is proposed to be increased to 40% by unit subject to grant funding and viability.
- The proposal would deliver between 7,225 sqm GEA and 36,300 sqm GEA of community and employment floorspace. The illustrative scheme would deliver 17,600 square metres of community and employment floorspace.
- The layout and design of the development optimises the potential of the site, provides acceptable levels of open space and respects the scale and character of the surrounding area and the amenity of neighbours.
- The proposal includes a set of parameter plans and a design code to guide future reserve matters applications which would be subject to further determination of a

range of detailed reserved matters from the planning authority and ensure high quality design.

- Whilst the proposal would conflict with some principles of the approved 2014 masterplan, it would deliver on its key principles and would make the most efficient use of the site.
- The 'less than substantial harm' to the wider setting and significance of a number of heritage assets would be outweighed by the significant public benefits that the proposed scheme would deliver.
- The development is estimated to deliver a minimum net increase of 240 Full Time Equivalent jobs once operational and a further 93 FTE associated supply chain jobs. The illustrative scheme is expected to deliver significant economic benefits including 1,214 construction jobs, 1,202 construction supply chain jobs, 453 net additional full time jobs from the proposed commercial and employment uses with 204 associated supply chain jobs and 163 supported jobs (from the 23.2 million annual increased household expenditure in the local area). The development is anticipated to generate up to £267.8 million of GVA to the economy every year during construction and £57.7 million of GVA to the economy per year once complete. £ 4.4 million in Council Tax revenues, £849,000 in Business Rates Revenue per annum, once complete. The development is anticipated to make approximately £10,000,000 in Community Infrastructure Levy contributions.

2 RECOMMENDATION

2.1 That the Committee resolve to GRANT planning permission and that the Head of Development Management or the Assistant Director Planning, Building Standards & Sustainability is authorised to issue the planning permission and impose conditions and informative notes subject to referral to the Mayor of London for his consideration at Stage 2 and signing of a section 106 Legal Agreement providing for the obligations set out in the Heads of Terms below and a section 278 Legal Agreement providing for the obligations set out in the Heads of Terms below.

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

2.3 That delegated authority be granted to the Head of Development Management or the Assistant Director to make any alterations, additions or deletions to the recommended heads of terms and/or recommended conditions as set out in this report and to further delegate this power provided this authority shall be exercised in consultation with the Chair (or in their absence the Vice Chair) of the Sub-Committee.

Conditions y – (the full text of recommended conditions is contained in **Appendix 11** of this report to follow).

Section 106 Heads of Terms:

Workspace provision

1. Business Relocation and Affordable Workspace Strategy

Strategy to assist with the relocation of existing business within the development to temporary or permanent locations within the development, or if that is not feasible, within the vicinity of the Site, to be submitted with each relevant Reserved Matters Application;

A proportion of Use Class E(g) floorspace provided within the masterplan will be provided as affordable workspace, suitable for a range of small businesses;

Affordable Housing

2. Affordable Housing:

- 35% affordable housing by unit across the whole site
- 500 affordable (social rent) units
- 28 Shared Ownership and 46 Shared Equity units to be provided south of White Hart Lane
- Resident leaseholds of Love Lane Estate (subject to eligibility) shall be offered a shared equity unit:
    - Shared Equity Housing- provided 25% equity of value with no rental of remaining 75% (for existing leaseholders) option to staircase to 100% of value, flexibility in tenure provided in order for the Council to provide low cost rent or Intermediate housing
- Tenure mix – 45% Intermediate housing & 55% Low Cost Rent housing by habitable room.
- Compliance with quality standards
- Affordable housing plan showing the location of affordable housing on a plot, to be submitted prior to commencement of that plot. Affordable housing residents to have access to the combined external communal amenity and play space as Market housing (where Blocks have a mix of tenures).

3. Affordability:

- Intermediate homes which are Shared Ownership to be delivered in accordance with the new London Shared Ownership Model, with rents on the unsold equity up to 2.75%
- Approve plan for marketing for first lettings of Intermediate Housing homes to households living or working in the following priority (1) Haringey and (2) London (3) other:
    - with max. annual income of £40,000 (Index Linked) for 1 & 2-bed homes and £60,000 (index-linked) for 3-bed homes – for 6-months prior to and up to completion of each Phase. After 3 months of marketing the income caps will increase to £60, 000 for 1, 2, and 3 bed- units, and up to £90, 000 (index linked) or as updated in line with the GLA Annual Monitoring Report from time to time, by practical completion.
    - Provided that annual housing costs for each home do not exceed 28% of the above relevant annual gross (40% net income) income levels.

4. Viability Review Mechanism:

- Early Stage Review (if not implemented within 24-months).
- Break Review (if construction suspended for 30-months or more)
- Mid term review(s)
- Late Stage Review [ ]% of

5. Marketing

Local Marketing to Haringey Residents include a Tottenham-first approach

Infrastructure Provision

6. Improvements to adjoining Public Realm and Open Spaces:

- Public realm and improvement works to be delivered onMoselle Place, part of Orchard Place, Brereton Road (north and south side)

7. Social Infrastructure

- Library and Learning Centre: Delivery of a new Library and Learning Centre in accordance with the parameters of development specification
- Healthcare Provision: To secure future healthcare provision on-site. New healthcare facility to be in operation prior to demolition of the existing Tottenham Health Centre.

8. Open space

- To pay a contribution of £50,000 towards improvements to Bruce Castle Park or a similar green space
- Public Park: Provision of a public park to be delivered to the north of White Hart Lane in accordance with the parameter plans;
- Public Square: Provision of a public square to be delivered to the south of White Hart Lane in accordance with the parameter plans;

Open Space Management and public art

9. Meanwhile Use Strategy: A strategy including provision for meanwhile uses across the Site

10. Provision of public art

£50,000 within Moselle Square and £50,000 within Peacock Park. Details and location of installation to be agreed with the Local Planning Authority

11. Curation and management of the public realm to provide for temporary events

12. Publicly Accessible Open Space Access & Management Plan

ensuring public access and future management & maintenance (in accordance with the Public London Charter) (October 2021).

- Plan to include:
  - stadium event day access and management and a crowd flow management plan
  - every day access and management

Transportation

13. Future Connectivity & Access Plan – setting out how the development shall be constructed to allow for potential future pedestrian, cycling and vehicular access across the proposed development and adjoining land.

14. **Car-Capping**:

- Prohibiting residents (other than Blue Badge holders) from obtaining a permit to park in the CPZ (outline development only)
- Parking Management plan to manage the provision of on site parking to prioritise Blue Badge holders then (excluding Love Lane Estate residents and Blue Badge holders);
- £5,000 for revising the associated Traffic Management Order.

15. Enfield CPZ Contribution

Baseline car parking survey, monitoring and if monitoring shows overspill car parking to be a significant problem, a financial contribution of up to a

maximum of £20,000 across the whole of the Development towards consultation/implementation of a CPZ.

16. Commercial Travel Plan

(including Interim and Full documents, monitoring reports and a £3,000 monitoring contribution) including:

- 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 tenant/organisation
- Cyclist facilities (lockers, changing rooms, showers, drying rooms for the non-residential uses)

17. Residential Travel Plans:

including Interim and Full documents, monitoring reports and a £3,000 monitoring contribution) including:

- 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

18 Car Club:

Establishment or operation of a Car Club Scheme.

Up to 10 x Car Club spaces across the development, to be provided on a phased basis (with actual number tbc following discussions with prospective operators).

2 years' free membership for each household and £50 per year credit for the first 2 years

19 Improvements to Percival Court: A commitment to resurface Percival Court;

Employment & Training

20 Local Employment & Training:

- Employment & Skills Plan – including Construction Apprenticeships Support Contribution & Skills Contribution (to be calculated in accordance with the Planning Obligations SPD).
- Commitment to being part of the borough's Construction Programme
- End-user Phase Skills and Training, Local Enterprise arrangements, and Apprenticeships:
- Contribution to support End-user Skills and Training

21 Loss of Non-Designated Employment Floorspace:

- Financial contribution to be paid where there is a net loss of employment floorspace in a given Plot, in accordance with the calculation and requirements of the SPD;

Carbon Management & Sustainability

22 Future connection to District Energy Network:

- Submission of Energy Plan for approval by LPA
- Ensure the scheme is designed to take heat supply from the proposed DEN (including submission of DEN Feasibility Study) ,
- Design of the DEN and approval of details at design, construction and commissioning stages (but no design elements will be required which did not form part of the planning application).
- Use reasonable endeavours to negotiate a supply and connection agreement with the proposed DEN within a 10-year window from the date of a permission subject to a DEN Feasibility Study.
- Collaborate with the LPA to deliver a future connection point from the site
- All DEN provisions will be subject always to any other agreed commercial terms between the Council and Developer

23 Carbon offsetting:

Payment of an agreed carbon offset at £90 per tonne over 30 years (£2,700) where individual Plots do not fully meet net zero carbon on-site; (residential & non-residential);

Telecommunications

24 Ultrafast broadband infrastructure

connections to be provided.

Construction

25 Construction Partnership:

A partnership agreement with the London Borough of Haringey for Construction of the Development;

26 Commitment to Considerate Constructors Scheme.

Monitoring

27 Monitoring costs

5% of the financial contribution total & £500 per non-financial contribution.

28 Design

- Architect Retention – Local Planning Authority agreement – All Plots
- Architectural competition to design building E

Implementation

29 Existing permissions:
Supplemental S106 shall be entered into prior to approval of any Reserved Matters Applications on the THFC plots which confirms that the obligations in THFC's existing s106 agreements are carried forward to apply to the new HRW permission on those specific plots, unless otherwise agreed with LBH. LBH will agree not to grant RMAs for these sites until these agreements have been entered into. The s106 agreement will confirm that these sites will not be bound by the main obligations under the s106 agreement.

30 Third Party Land
In the event that any third party land within the redline is acquired by the Developer there will be an obligation for the Developer to enter into a supplemental deed to the section 106 confirming that such land is bound by the above obligations .

Highways

Section 278 Highways Agreement Heads of Terms:

Highway works to be carried out by Developer
Agreement(s) shall secure:

1) public realm improvements listed above
2) highway improvements works to:
    a. Whitehall Street East;
    b. Whitehall Street West;
    c. Moselle Street;
    d. Tottenham High Road Works;
    e. Love Lane;
    f. Brunswick Square;
    g. William Street; and
    h. construct of a new site access from Tottenham High Road

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4.0 CONSULATION RESPONSE
5.0 LOCAL REPRESENTATIONS
6.0 MATERIAL PLANNING CONSIDERATIONS
7.0 COMMUNITY INFRASTRUCTURE LEVY
8.0 RECOMMENDATIONS

APPENDICES:

Appendix 1: Images of the site and proposed scheme
Appendix 2: Internal and External Consultee representations
Appendix 3: Neighbour representations
Appendix 4: Mayor of London Stage 1 Report (7 February 2022)
Appendix 5: Planning Sub-Committee Minutes (25 October 2021)
Appendix 6: Development Management Forum (13 October 2021)
Appendix 7: Quality Review Panel Report (27th June 2018)
Appendix 8: Quality Review Panel Report (30th Jan 2019)
Appendix 9: Quality Review Panel Report (28 April 2021)
Appendix 10: Quality Review Panel Report (23 June 2021)
Appendix 11: Quality Review Panel Report (17 September 2021)
Appendix 12: Quality Review Panel Report (2nd March 2022
Appendix 12: Plans and Documents List
Appendix 13: Planning Conditions

3. PROPOSED DEVELOPMENT AND SITE LOCATION DETAILS

Proposed Scheme

3.1 The is a 'hybrid' application (part full,part outline) where full planning permission is sought for Plot A for the demolition of 100 Whitehall Street and Whitehall and Tenterden Community Centre and the erection of two 5-6 storey buildings containing 60 affordable dwellings and associated open space.

3.2 Outline planning permission is sought, for the demolition of existing buildings and the creation of a mixed-use development comprising up to 2,869 residential dwellings (Use Class C3) and at least 7,225 sqm commercial, business & service (Use Class E), leisure (Use Class E), community uses (Use Class F1/F2), and Sui Generis uses together with creation of a new public square of at least 3,500 square metres, creation of a new public park of at least 5,300 sqm & associated access, parking, and public realm works. Matters of appearance, landscaping, layout and scale are reserved for subsequent approval (reserved matters) and detailed approval is sought for matters of access.

Table 1 below sets out the minimum and maximum floorspaces, for each use class, as set out in the development specification.

Total floorspace	**Floorspace**
Detailed Element	
Residential	6,788 sqm (GIA)
Outline Element	
Residential	235,000 – 280,000 sqm (GEA)
Use Class B2: Industrial	0 – 7,000 sqm (GEA)
Use Class B8: Industrial	0 – 1,000 sqm (GEA)
Commercial (Use Class E)	6,025 sqm – 22,000 sqm (GEA)
Use Class E (a): Retail other than hot food	4,000 – 7,800 sqm (GEA)
Use Class E (b): Sale of food and drink mainly for consumption on premise	
Use Class E (c): Commercial,	

professional (other than medical) or financial services	
Use Class E (d): Indoor sports, recreation or fitness	500 – 4,000 sqm (GEA)
Use Class E (e): Medical or healthcare	0 – 1000 sqm (GEA)
Use Class E (f): Creche, day nursery or centre	0 – 2,000 sqm (GEA)
Use Class E (g): offices for operational or administrative functions, R+D of Products or processes, industrial processes	1,525 – 7,200 sqm (GEA)
(Use Class F)	1,000 – 6,000 sqm (GEA)
Use Class F1 (d): Public Libraries or reading rooms	500 – 3,500 sqm (GEA)
Use Class F1 (e): Public halls or exhibition halls	
Use Class F2 (b): local community halls	500 – 2,500 sqm (GEA)
Sui Generis Use Class	200 – 8,300 sqm (GEA)
Energy Centre	200 – 1,800 sqm (GEA)
Public House	0 – 3000 sqm (GEA)
Sub Station	0 – 500 sqm (GEA)
Cinema	0 – 3,000 sqm (GEA)
Total	252,907 – 339,300 sqm (GEA)
A minimum floorspace of 4,686sqm GEA will be delivered either as B2, B8 or E(g i, ii or iii) consistent with the Minimum and Maximum floorspace areas for these uses	

The proposed illustrative layout

3.3 The submission is accompanied by an illustrative layout which provides a potential way that the outline part of the site could be development within the submitted control documents (the parameters plans, design code and development specification). The illustrative scheme does not represent the maximum development for which planning permission will be granted, but illustrates how it could come forward within the parameters and design code proposed.

3.4 The southern part of the site centres on a new public square (Moselle Square) linking White Hart Lane Station to the West to the New Tottenham Hotspur Stadium to the east. East to West connections, across the railway line are provided by Whitehall Street and White Hart Lane. Coombes Lane, Love Lane and William Street provide north-south links from Brereton Road/ Orchard Place to White Hart Lane. The layout carries through a perimeter block arrangement.

3.5 The northern part of the site centres on the proposed Peacock Park. Pickford Lane, to the northern most fringe, runs adjacent to Peacock Park, linking High Road to Canon Road. The sidings and Grange Street run in close proximity to the railway, providing a circular link from White Hart Lane to Parkside West. The layout broadly forms a perimeter block layout.

3.6 The illustrative masterplan layout includes the existing depot and goods yard extant planning permissions HGY/2018/0187 and HGY/2019/2929 and the Printworks application (ref HGY/2021/2283) that has a resolution to grant planning permission, insofar as they are located within the application site, to enable the option of simultaneous delivery of each scheme. The recently refused Depot and Goods Yard application (ref HGY/2021/1771) has not been incorporated into the illustrative masterplan layout.

3.7 Overall, the indicative masterplan delivers 2,612 new homes (including 916 affordable dwellings), capacity for 3-10% accessible parking spaces, parking for returning Love Lane residents, 40% family sized units (2 bedroomed, 4 person plus dwellings), over 12,922 sqm of commercial floorspace (including a minimum of 4,686 square metres of new employment space and over 4,900 square metres of new retail floor space), over 2,977 sqm of community space is proposed along with a minimum of a 5,300 square

metre park (Peacock Park) and a minimum of 3,350 square metre civic square (Moselle Square) as part of an overall 42,100 sqm of publicly accessible open space (figure 1).

3.8 In respect to building scales, the proposed masterplan envisages building heights increasing from 2-3 storey level at High Road to up to 29 storeys adjacent to the railway line with scale decreasing towards White Hart Lane. The illustrative development density is 337 dwellings/ 945 habitable rooms per hectare and an average open space provision of 16.2 square metres per dwelling.

3.9 The illustrative scheme delivers 48 on-plot parking spaces, 10 on-street parking spaces and 31 basement car parking spaces, 4,792 long stay, 485 short stay and 134 on street cycle parking spaces. The vehicle parking is to be provided for returning Love Lane residents alongside disabled parking bays.

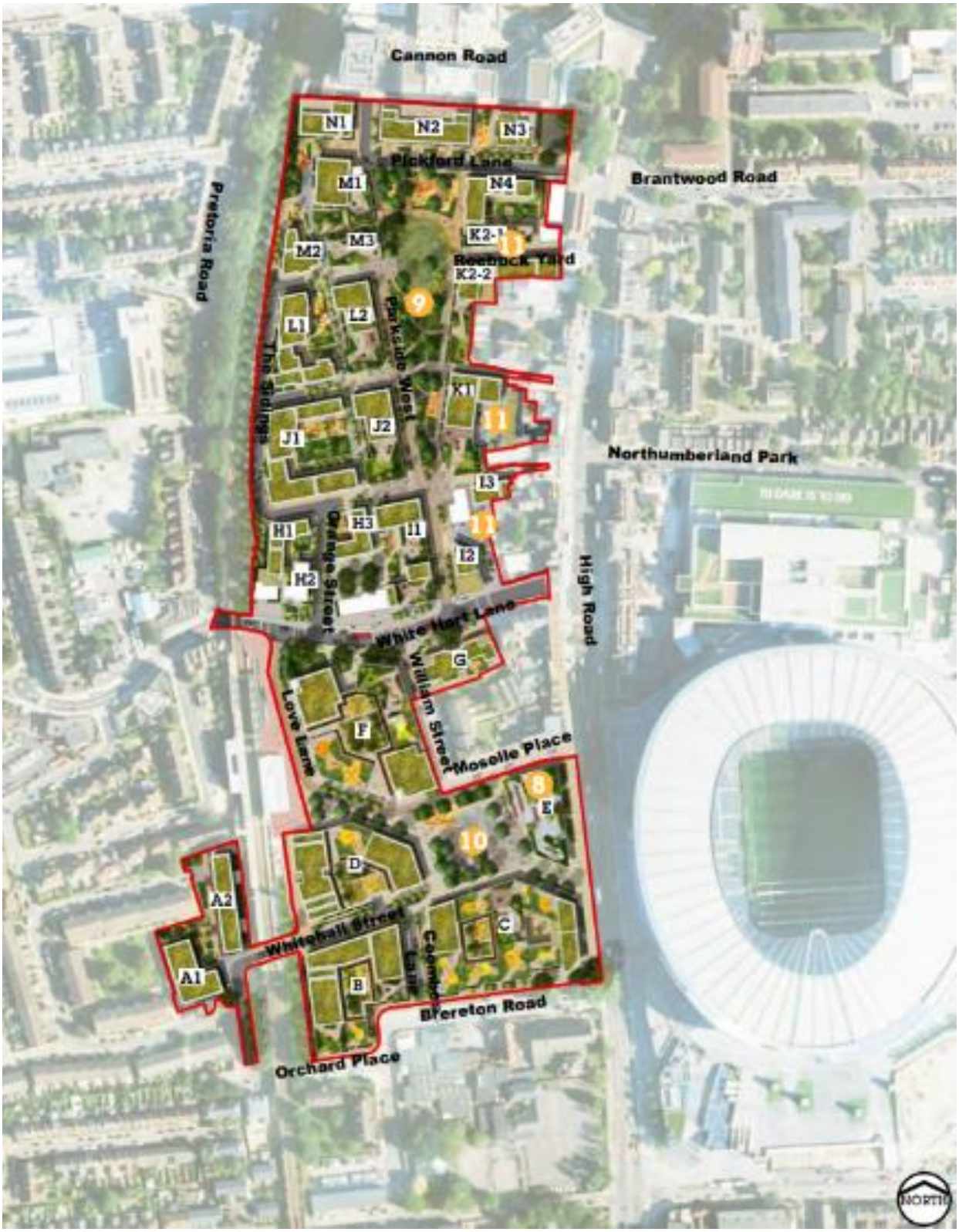


Figure 01: The proposed Illustrative Masterplan.

3.10 All existing vehicular, cycle and pedestrian access points are proposed to be retained and enhanced with increased permeability through the site on the north-south and east-west axis.

3.11 The illustrative masterplan layout concentrates commercial and community uses towards Moselle Square, White Hart Lane, High Road and Peacock Park, mostly as part of mixed use buildings, creating active frontages at street level. This includes blocks C, D, E, F, G, H1, H2, H3, I1, I2, I3, K1, K2-1, K2-2, M3 and N4. Residential uses are focused on the upper floors of mixed-use buildings and residential only blocks to the south, west and north/ north west of the site. Residential only blocks include the detailed part of the permission (A1 and A2), B, J1, J2, L1, L2, M2, M1, N1, N2 and N3.

3.12 Based on the most up-to-date GLA Population Yield Calculator, the estimated future resident population once the proposed scheme is completed would be 6,410 people. The applicant expects the proposed scheme to be delivered over a ten-year construction period starting in 2022 as set out in the proposed illustrative phasing plan Figure 2 and Table 02 below. The expected on-site population would increase incrementally over this period.

Figure 2: Proposed illustrative phasing plan.



Key (Not for Approval)

- Hybrid Planning Application Boundary
- Existing buildings, associating structures and spaces to be retained
- Phase 1 - Plots A, G and Love Lane (2022 - 2024)
- Phase 2 - Plot D and F (2025 - 2028)
- Phase 3 - Plot B, C, E and Moselle Square (2029 - 2032)
- Phase 4 - Plots M2, L1, L2, H1, H2, H3 (2022 - 2024)
- Phase 5 - Plots M1, N1, N2, N3, N4 and upper portion of Peacock Park (2023 - 2026)
- Phase 6 - Plot K2, M3, L2 and portion of Peacock Park (2026 - 2028)
- Phase 7 - Plots K1, J2 and remaining portion of Peacock Park (2026 - 2029)
- Phase 8 - Plots I1, I2 and I3 (2027 - 2029)

Table 02: Proposed illustrative phasing Plan

	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032
Phase 1: Plots A, G and Love lane											
Phase 2: Plot D and F											
Phase 3: Plot B, C, E and Moselle Square											
Phase 4: Plot M2, L1, L2, H1, H2, H3											
Phase 5: Plot M1, N1, N2, N3, N4 and upper Peacock Park											
Phase 6: Plot K2, M3, L2 and Peacock Park											
Phase 7: Plot K1, J2 and rest of Peacock Park											
Phase 8: Plot I1, I2 and I3											

Environmental Impact Assessment

3.13 The proposed development falls within the scope of Paragraph 10B “Urban Development Projects” to Schedule 2 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. As such, it represents ‘EIA development’ and is accompanied by an Environmental Statement (ES). Regulation 3 prohibits the Local Planning Authority (LPA) from granting planning permission without consideration of the ‘environmental information’ that comprises the ES, any further information and any representations made by consultation bodies or by any other person about the environmental effects of the proposed development. The scope of the ES reports on an assessment of the potential cumulative effects of the proposed development.

The Site and Surroundings

3.14 The application site is a circa 8.57 - hectare ‘L’ shaped parcel of land, comprising the Goods Yard and the Depot to the north of White Hart Lane and the Love Lane Estate to the south of White Hart Lane. The detailed part of the site comprises Whitehall and Tenterden Community Centre and Whitehall Lodge (no. 100 Whitehall Street). The outline part of the application site includes the site areas for the existing Goods Yard and Depot Site extant consents (references HGY/2018/0187 and HGY/2019/2929).

Detailed part of the site -Whitehall and Tenterden Community Centre and Whitehall Lodge

3.15 Whitehall and Tenterden Community Centre is a single storey, metal clad, community building located on the westerns side of the railway line. The building has seven off-street parking spaces to the south and is accessible via Whitehall Street. Whitehall Lodge is a brick built, three storey flat block that currently provides temporary emergency accommodation. To the south of the building is a fenced in grass verge and there is low level planting and boundary treatments onto the shared Headcorn and Tenterden garden square (figure 3).

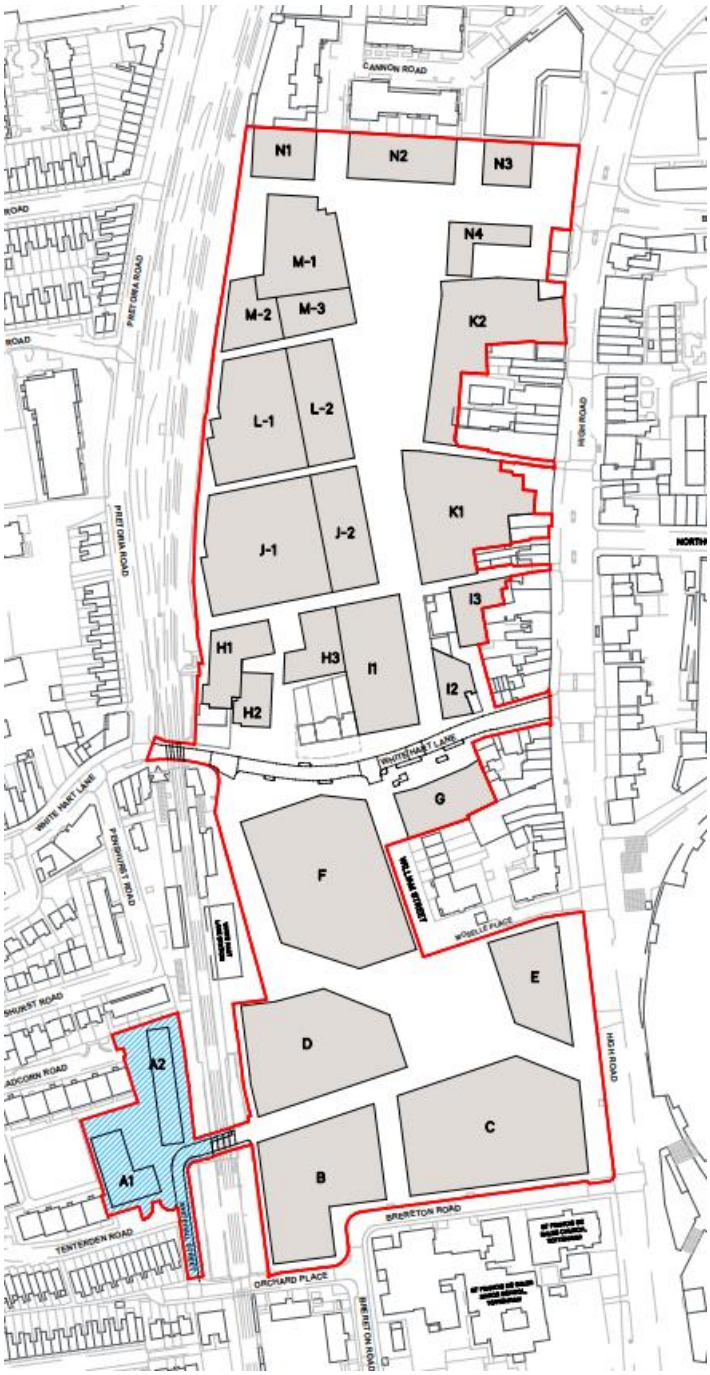


Figure 3. Outline part of the site

3.16 The outline part of the site is located between the railway to the west, High Road (A1010) to the east, Cannon Road to the north and Brereton Road/ Orchard Place to the south. The site is bisected east-west by Whitehall Street in the south and White Hart Lane in the centre. The eastern part of the site is located in North Tottenham Conservation Area. There are several listed and locally listed buildings within and in close proximity of the application site.

South of White Hart Lane

3.17 The southern part of the site is predominantly occupied by the Love Lane Estate. The 1960's estate provides 297 homes across 3 Y shaped, 9-10 storey blocks and several other 4 storey blocks with associated open space and parking areas. The estate is bounded to the west by Love Lane, the rail station and the rail line, to the east by terraced buildings, in mixed commercial and residential use, that front High Road. The southern part of the site includes Coombes Croft Library together with several other commercial properties fronting High Road. The site also includes the locally listed former Whitehall Tavern Public House (No.759 High Road); No. 743-757 High Road (odd), and electricity substation (adjoining the library).

North of White Hart Lane

3.18 The northern part of the site is characterised by industrial and commercial buildings located within the Peacock and Carbery Industrial Estates. A large, two storey B&M store and a block of 5 smaller retail units, with associated parking, occupies the northern-most part of the site. No. 859-863 High Road, a Grade II Listed building, is partially within the north-eastern part of the site. Peacock Industrial Estate is located in the centre of the northern part of the site and includes a range of buildings and uses including car servicing businesses, a wood spraying facility, electrical repair shop and small construction companies. The site accommodates, a large retail store, currently occupied by B&M Home Store, five small retail units and a surface level car park (figure 4). Part of the High Road frontage is located within the North Tottenham Conservation Area.

3.19 There are two large London plane trees on the eastern part of the site, near the High Road (one on the northern boundary and one close to No. 869) and two other large London plane trees in the High Road footway. There are a number of other smaller less noteworthy trees on the site and immediately to the west in the railway embankment.

3.20 To the east, there are existing homes to the rear of Nos. 841-843 High Road, the La Royale Banqueting Suite (which is located at 819-821 High Road (Grade II Listed) and extends into the Site) a church (International Ministries for the Living Word) and the former pastor's house on Chapel Place (locally listed).

3.21 The site falls from west to east towards High Road and towards White Hart Lane. Site levels vary between 11m Above Ordinance Datum at its lowest point in the south-eastern corner to 15.5 metres at its highest point, adjacent to the railway line to the north-west.



Figure 4: Arial view of the application site in its context.

Heritage Assets

3.22 Parts of the site are located within North Tottenham Conservation Area and there are several listed buildings immediately adjacent to the site including the Grade II listed no.7 White Hart Lane, no. 797 and 799 High Road, no.867 and 869 High Road and on the opposite side of High Road is the Grade II* listed Dial House, Percy House and 808-810 High Road along with the Grade II listed nos. 792 – 794, nos. 798 – 802 and nos. 816 – 822 High Road. There are several other designated and non-designated heritage assets in proximity to the site (figure 5).

Figure 05: ES Appendix 11.1 (Heritage Assets Plan)

Accessibility

3.23 The Public Transport Accessibility Level (PTAL) varies across the site. Ranging from 3 - 5. White Hart Lane Station is located immediately adjacent to the western boundary. There are several bus routes in the vicinity of the site that stop along High Road

(A1010), White Hart Lane and Northumberland Park. Cycleway 1 is located circa 400 metres to the south of the site.

3.24 The site is adjacent to part Cycle Superhighway 1, which runs from Old Street to the Stadium, well served by bus services (Routes 149, 259, 279, 349 and N279) on the High Road) and is adjacent to White Hart Lane Overground Station and the W3 bus route on White Hart Lane. It is within the Tottenham North Controlled Parking Zone (CPZ) and the Stadium Event Day CPZ.

Existing Land Uses

3.25 Table 04 below sets out the existing uses on the site.

Use (Use Class)	**Existing Floorspace (GIA)**
B2: Industrial	9,818
B8: Industrial	864
Total B Class Use	**10,682**
C3: Residential	31,109
C2: Institutional Accommodation	879
Total C Class Use	**31,998**
E (a) Retail other than hot food	8,236
E (b) Sale of food and drink mainly for consumption on premise	3,759
E (e) Medical or healthcare	818
E (g) Officers	1,627
Total E Class Use	**14,400**
F1 (d) Public Library	455
F1 (f) Public places of worship	595
F2 (b) Local community halls	1,023
Total F Class Use	**2,073**
Sui Generis (Public House)	1,086
Sui Generis (Sub Station)	86
Sui Generis	1,172
Total	**60,355**

Surroundings

3.26 Immediately to the north of the site is the Cannon Road housing scheme, which was built on the site of the former Cannon Rubber Factory in 2014/15. It comprises four residential buildings, which from west to east are: River Apartments (part 22/part 23-storeys – 86.2m AOD), Mallory Court (6-storeys) which backs on the application site, Ambrose Court (9-storeys) and Beachcroft Court (part 4/part 5-storeys), which includes the Brook House 2FE Primary School on the ground and first floors. Cannon Road itself splits in to two north-south cul-de-sacs. The eastern arm of Cannon Road includes a games/outdoor learning space that is connected with the school.

3.27 Further to the north, in the London Borough of Enfield, is the Langhedge Lane Industrial Estate and the Joyce and Snells Estate, where Enfield Council is intending to bring forward an estate renewal scheme comprising approx. 1,992 homes and associated social infrastructure and open space.

3.28 To the east is the High Road which comprises a range of three to four-storey buildings. Most of the buildings on the eastern side of High Road have a commercial element at ground floor level with housing/ ancillary uses on the upper floors. Beyond High Road, to the east. are the residential streets based around Brentwood Road and the Tottenham Hotspur Stadium and associated facilities.

3.29 To the west of the site is White Hart Lane Train Station and associated Overground Line. Beyond are predominantly residential terraced buildings on Pretoria Road, Penhurst Road and Tenterden Road along with various community and commercial uses off Creighton Road and White Hart Lane.

3.30 To the South of the site is the St Francis de Sales Church and Junior School with the residential buildings fronting Orchard Place, Whitehall Street and Tenterden Road.

Relevant Planning and Enforcement History

The site

3.31 Goods Yard – Temporary planning permission (HGY/2015/3002) was granted in February 2016 for a period of three years for the Goods Yard to be used as a construction compound associated with the new stadium.

3.32 Goods Yard - Planning permission (HGY/2018/0187) was granted on appeal, against non-determination, in June 2019 for a residential-led mixed use redevelopment comprising up to 316 residential units, 1,450sqm of employment (B1 use), retail (A1 use), leisure (A3 and D2 uses) and community (D1 use) uses.

3.33 Depot – Planning permission (HGY/2019/2929) and Listed Building Consent (HGY/2019/2930) were granted in September 2020 for the conversion of Nos. 867-869 High Road and redevelopment of the rest of the site for a residential led mixed-use scheme with up to 330 residential units (class C3), 270sqm of retail/café use (Use Class A1/A3), area of new public open space, landscaping and other associated works.

3.34 Goods Yard - Planning permission (HGY/2020/3001) granted in March 2021 for ground works to facilitate the temporary use (18 months to September 2022) for car parking (approx. 415 spaces).

3.35 High Road West (the application site) (HGY/2021/2960) and EIA Scoping Opinion in relation to the proposals (superseded by the submission of the application)

3.36 Goods Yard and Depot – Hybrid planning application (HGY/2021/1771) was refused and currently subject to appeal for a residential-led mixed use redevelopment comprising of up to 869 residential units.

3.37 The Printworks (Nos. 819-829 High Road) – current planning (HGY/2021/2283) and Listed Building Consent (HGY/2021/2284) applications for the demolition of 829 High Road; change of use and redevelopment for a residential-led, mixed-use development comprising residential units (C3), flexible commercial, business and service uses (Class E) and a cinema (Sui Generis). The application has a Planning Sub Committee resolution to grant.

3.38 Goods Yard and Depot - Revised Hybrid planning application HGY/2022/0563 submitted 24/02/2022.

The wider area

3.38 807 High Road – Planning permission granted in September 2021 (HGY/2021/0441) for the demolition of the existing buildings and the erection of a replacement building up to four storeys to include residential (C3), retail (Class E, a) and flexible medical/health (Class E, e) and office (Class E, g, i) uses; hard and soft landscaping works including a residential podium; and associated works.

3.39 Northumberland Terrace – Planning permission (HGY/2020/1584) and Listed Building Consent (HGY/2020/1586) granted in April 2021 for the erection of a four-storey building with flexible A1/A2/A3/B1/D1/D2 uses and change of use and alterations and extensions to a number of existing buildings (Nos. 799 to 814 High Road).

3.40 White Hart Lane Station – Planning permission (Ref: HGY/2016/2573) granted in November 2016 for a new station entrance, ticket hall, station facilities and station forecourt (completed).

3.41 Northumberland Development Project – Planning permission (HGY/2015/3000) and Listed Building Consent (HGY/2015/3000) granted in April 2016 for demolition of existing buildings, works to Warmington House and comprehensive phased redevelopment for a 61,000 seat stadium, with hotel (180-bed plus 49 serviced apartments), Tottenham Experience (sui generis), sports centre (Class D2); community (Class D1) and/or offices (Class B1); 585 homes; and health centre (Class D1) – towers up to 36-storeys.

3.42 Former Cannon Road Rubber Factory – Planning permission (HGY/2012/2128) granted In February 2013 for 222 residential units, a 2-form entry primary school and three commercial units (including a 22-storey tower) and subsequent approval of details. The development was completed in 2015.

3.43 The illustrative masterplan and proposed parameters plans, that accompany the submission allow for the consented developments, within the application site area, to take place, independently of the remainder of the proposed High Road West development.

Consultation and Community Involvement

3.44 The applicant's Statement of Community Involvement (SCI) sets out that the proposal has been supported by extensive community and key stakeholder consultation. This includes during the consultation stages of the High Road West Masterplan (2014). The 2013 consultation received 435 feedback forms (207 from Love Lane residents, 70 from Local Businesses and 158 from residents from the wider community and 10 organisational responses). The consultation identified option 3 as the preferred option. The 2014 consultation received 292 feedback forms including 130 from Love Lane Residents, 38 from Local Businesses, 104 from residents in the wider community and 35 anonymous comments. The consultation established the preference for key principles of the masterplan including, but not limited to, the demolition of the Love Lane Estate, all homes should have access to amenity space, the provision of a community hub, a new public square and a more accessible station.

3.45 Between March and May 2017, a six week, S105 consultation event including information pack provision, feedback form (electronic and postal), drop in sessions and home visits was held with Love Lane residents about future housing in the estate area. Further consultation regarding development in the area took place as part of the Tottenham Area Action Plan (AAP) and development of the applicants Masterplan.

3.46 The proposal is required to comply with the Mayor's Good Practice Guide to Estate Regeneration 2018 which requires full and transparent consultation and involvement.

3.47 The applicant's masterplan stage 0 consultation involved distribution of over 24,000 letters and flyers, 37 one-one and group meetings, 7 information drop in sessions, 9 pop up events, 1 drop in exhibition, 1 community fun day and 1 walk and talk event. Safety, security, youth/family orientated community facilities, parking transport and scale and massing of buildings were concerns amongst participants and new homes, employment and retail uses were welcomed. The feedback received then translated into the applicant's masterplan.

3.48 The stage 1 engagement involved the distribution of 13,078 masterplan packs, flyers and letters, 172 telephone calls with Love Lane residents, 4 virtual presentations, 3,000 feedback forms distributed and 2 live question and answer sessions between February and April 2021. Residents were positive about the open spaces but wanted to see more greenery and a reflection of local identity, concerns remained about safety and provision of facilities for families and children. Residents wanted choice on home design and clarity on open space access and moving arrangements.

3.49 Stage 2 engagement involved over 1,000 workshop invitations/ reminders being sent, 49 stakeholder emails being sent, 3 design workshops, 3 one-one meetings with stakeholders and 3,194 workshop flyers being distributed. Participants agreed with a shift to sustainable transport but felt parking should be distributed throughout, CCTV was seen as a must, management was seen as an important contributor to safety, event and

play spaces and community buildings were supported by residents. Residents were supportive of sensitively designed modern buildings. Residents were positive about employment and retail uses but did not extend positivity to drinking establishments.

3.50 Stage 3 engagement (August to September 2021) involved 3,500 masterplan packs and flyers being distributed, 564 emails sent to the mailing listed, 2 drop in sessions, 2 one-one meetings, 1 business drop in session and a community fun day. Feedback provided on the Whitehall Mews included concerns on amenity of surrounding residents, opportunities to improve the area were highlighted.

3.51 An independent ballot was run during August and September 2021. 203 votes were cast by the closing date of 6 September 2021, representing a 69.4% turnout for Love Lane residents 55.7% voted in favour of the proposal for the regeneration of the Love Lane Estate as part of the High Road West scheme.

3.52 The emerging proposals were considered by Haringey's Quality Review Panel (QRP) on the 27 June 2018, 30 January 2019, 28 April 2021**,** 23 June 2021, 17 September 2021 and the application scheme was considered by the Panel on 2nd March. The QRP Reports following these reviews are attached as **Appendices 7 - 11**.

3.53 Emerging proposals were presented at a Development Management (DM) Forum on 13 October 2021. A summary of responses from the Forum are attached as **Appendix 6**.

3.54 Throughout the planning application process the applicant has continued to engage with the local community including hosting business breakfast, hosting of public exhibitions, drop in sessions, the creation of a dedicated High Road West website, facilitation of site visits, publication of newsletters. The findings of these consultation exercises include an interest in development phasing, a desire for regular update sessions, desire to forge a relationship with the construction liaison officer, management of the site, sunlight/daylight impacts, fire safety, security, event management and construction management. The applicant envisages the delivery of a series of public information sessions, if planning permission was to be forthcoming

3.55 The application was also presented to Planning Sub Committee members at pre-application stage on the 25th of October 2021. The Committee sought clarification on affordable housing provision, the potential for the provision of a bridge over the railway and the density of the proposed development. The Committee welcomed the size of the social rent units and the provision of 3-4 bedroomed units.

3.56 The application seeks to address the issues raised at pre-application stage through the submission of a comprehensive suite of supporting documents that includes, but is not limited to, parameters plans, a design code, a development specification and an affordable housing statement.

4 **CONSULTATION RESPONSE**

4.1 The following were consulted regarding the applications:

Internal Consultees

- LBH Building Control
- LBH Carbon Management
- LBH Conservation Officer
- LBH Design Officer
- LBH Drainage
- LBH Ecology
- LBH Education (School Places Planning)
- LBH Housing
- LBH NHS Haringey
- LBH Planning Policy
- LBH Pollution
- LBH Tottenham Regeneration
- LBH Transportation
- LBH Tree Officer
- LBH Waste Management

External Consultees

- Affinity Water
- Arriva London
- Brook House Primary School (Head Teacher)
- Enfield (London Borough of)
- Environment Agency
- Georgian Group
- Greater London Authority
- Greater London Archaeology Advisory Service (GLAAS)
- Historic England
- London Overground
- London Fire Brigade
- Mayor's Office for Policing and Crime
- Metropolitan Police - Designing Out Crime Officer
- National Grid
- National Planning Case Unit (EIA Development)
- Natural England
- Network Rail
- Newlon Housing Association

- NHS Clinical Commissioning Group
- Residents Associations (Cannon Road RA, Headcorn, Tenterden, Beaufoy & Gretton RA, Northumberland Park RA, Love Lane Residents Association & Love Lane RA (TAG)
- Sport England
- Thames Water
- Tottenham Civic Society
- Tottenham CAAC
- Transport for London
- Tree Trust for Haringey
- UK Power Networks
- Waltham Forest (London Borough of)

4.2 An officer summary of the responses received is below. The full text of internal and external consultation responses is contained in **Appendix 2.**

Internal:

Building Control – The principles in the outline Basement Impact Assessment and Fire Safety Statement are correct. Detailed statements will be required at reserved matters stage.

Carbon Management – The proposal is considered to be acceptable subject to conditions requiring compliance with the energy statement for plot A, securing the implementation of the energy efficiency measures, securing registration on the GLA's energy monitoring platform, requiring the submission of an overheating assessment for plot A and requiring compliance with boiler specifications. Conditions are also recommended for the outline part of the site to include an energy strategy to be submitted at reserved matters stage, compliance with the approved energy strategy, the submission of an overheating assessment at reserved matters stage, the provision of details of living roofs/walls, the submission of a BREEAM design stage accreditation certificate, circular economy statements and post completion reports and whole life carbon assessment. It is also recommended that sustainability reviews, commitments to upload be seen data, deferred carbon offsetting and DEN connection is secured by legal agreement.

Conservation Officer – The proposed scheme offers in principle a positive opportunity for improvement of both the North Tottenham area and the setting of the Conservation Area and its heritage buildings, it is a scheme guided by a thorough urban design exploration, a good contextual analysis and heritage awareness and is fully supported from the conservation standpoint.

However, the heritage sensitivities and opportunities disseminated across the site and along the High Road frontage, would benefit from a heritage-led implementation of the proposed parameters as well as requiring more detailed and stringent design guidance for the proposed scheme so to ensure that future detailed schemes respect and positively respond to neighbouring heritage assets.

The tallest elements of the new development dominate to various degrees in the background of currently undeveloped, or modestly developed views towards the development site as experienced from various standpoints including Bruce Castle Park, from White Hart Lane, along the High Road, as well as from Northumberland Park and from the north entrance into the High Road. This would lead to a level of harm at the mid-range of 'less than substantial' affecting several designated and undesignated heritage assets and the tests set at paragraphs 196 and 203 of the NPPF will apply.

Design Officer – The proposal has ambition to create a new neighbourhood of excellent design and living conditions, supporting a vibrant new town centre that contributes to positive change in North Tottenham. This includes new public realm, a park, civic square and landmark buildings. Satisfied that the proposal can be a vibrant town centre and a pleasant place to live.

Planning Policy – The residential led mixed use development of the site generally accords with the Local Plan Strategic Policies document, Tottenham AAP and High Road West Masterplan and the principle of the proposal is therefore considered acceptable.

Ecology Officer – No comment received

Lead Local Flood Authority – Satisfied with the outline part of the scheme subject to conditions relating to surface water drainage and its management and maintenance, the Flood Risk Assessment, calculations, drawings, management and maintenance plan detailed part of the scheme are acceptable

Pollution – No objection, subject to conditions on Land Contamination, Unexpected Contamination, NRRM and Demolition/Construction Environmental Management Plans, Air Quality Assessment and details of the Combined Heat and Power Facility and gas boilers.

School Places Planning – We are satisfied that there is sufficient school capacity.

Transportation – No objection subject to further details and conditions.

Tree Officer – I mostly concur with the findings of the Arboricultural Impact Assessment. The provision of 236 new trees will mitigate the proposed loss at a 4:1 ratio. There are some inconsistencies between the landscape masterplan and the Arboricultural Impact

Assessment that will need to be addressed by condition. An Arboricultural methods statement, landscape plan/ specification will need to be conditioned.

Waste Management – The bin provision for plot A are in line with adopted guidance however there is a preference for 1 x 140 litre food waste bin per 10 units) (3 bins in place of the 360 litre bin proposed). The swept path analysis will need to more clearly show that refuse collection vehicle reversing and has been limited and suitable turning space is available. The indicative bin store locations for the outline part of the scheme are acceptable. The swept path analysis provided will need to show more clearly that efforts have been made to limit reversing of RCV vehicles/factoring in space for vehicles to turn around. Commercial stores should be designed to provide 1 week storage capacity despite the fact that commercial contractors can collect up to twice daily.

External:

Enfield (London Borough of) –No comment received.

Environment Agency – No objection subject to conditions.

Greater London Archaeological Advisory Service – No objection subject to conditions relating to written scheme of investigation, building recording, foundation design and a scheme of heritage interpretation, landscaping and display.

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

Haringey Cycling Campaign – The proposed cycle routes should be clearly marked and legible in the interest of vehicle, pedestrian and cyclist safety and in accordance with latest guidance. The open space should be more generous.

London and Middlesex Archaeology Society – There is concern about the scale and loss of locally listed buildings and that the losses are greater than normally acceptable but acknowledge that this is the direction of travel. Greater consideration could have been given to relocation/ retention of such buildings. In the event there is no advantage gained by retaining the assets they ask for HE level 2 (preferably 3) recording.

London Fire Brigade – The proposed fire fighting access arrangements appear to meet our requirements.

Metropolitan Police (Designing Out Crime Officer) – No objection in principle, subject to a planning condition requiring a ‘Secured by Design’ accreditation to be achieved for each building, before the building is occupied and the inclusion of an informative.

National Planning Casework Unit – No comments on the Environmental Statement.

Natural England –We are satisfied that the impacts on the Epping Forest Special Area of Conservation and underpinning Site of Special Scientific Interest can be appropriately mitigated with a SANGS financial contribution.

Network Rail – Comments in relation to works next to the railway (Demolition, Scaffolding/Plant & Materials, Access to and from the Station, Track Support Zone, Buried Services, Unathorised Access, Overhead Line Equipment and Site Layout) and the Impact of Noise and Dust on Railway Operations.

NHS Clinical Commissioning Group – Tottenham Health Centre (759 High Road) is proposed to be demolished. The parameters plans include the provision of a 0 – 1000 square metres of floorspace in use class E(e). A replacement healthcare centre will need to be secured by legal agreement as well as a £3,073,120 financial contribution towards meeting the intensified healthcare demand resulting from the development. There should be a mechanism to monitor and evaluate the construction and operational impacts and mitigation measures.

Rail for London – No objection subject to a condition requiring detailed design, methods statements and risk assessments for each stage of development prior to the development commencing.

Sport England – The development should contribute towards meeting the demand for sports facilities generated by the development through on-site and/or improving off site capacity.

Thames Water – Waste - no network infrastructure capacity objections in relation to foul water and surface water. Request for conditions to safeguard water mains and other underground water assets and delivery of necessary essential water infrastructure to support the development.

Transport for London –The proposed parking strategy is considered to be acceptable. The applicant is encouraged to make improvements under the bridge along Whitehall Street. The safeguarding of a future links is welcome. Impacts of the proposed link from the station to the stadium will need to be designed to avoid adverse impacts on bus stop T. Wayfinding should be provided throughout the site. There are some aspects of the bus and trip generation figures that need clarifying/ amending. Notwithstanding this, based on the most relevant and latest multi-modal data available, is unlikely to make a noticeable difference on the net impact of development proposals and to have a significant impact on the strategic road network. Detailed travel plans, CEMP's, waste management strategy, car club provision, electric charging points, returning residents parking, a parking management plan and cycle parking should be secured by planning condition and/or legal agreement.

Waltham Forest (London Borough of) - No comment received.

Mayor of London – The Mayor's Stage 1 Report raises no objection subject to the following matters being addressed:

- Estate regeneration: The scheme would ensure the like for like replacement of existing affordable housing and the right to return for all social rent households. The approach to leaseholders and public consultation would comply with the Mayor's key principles on estate regeneration. Therefore, the comprehensive redevelopment of the estate could be supported in this case, subject to the maximum viable level of affordable housing provision being secured.
- Land use principles: the comprehensive residential-led mixed use redevelopment of the site accords with the expectations set out in the Local Plan site allocation and is supported in strategic planning terms, subject to further discussion and clarification regarding the provision of employment and social infrastructure use and means of securing this.
- Housing and affordable housing: The applicant's Financial Viability Assessment (FVA) is being scrutinised to ensure the scheme is providing the maximum viable level of affordable housing. Early, mid and late stage viability review mechanisms will be required. Affordability levels on intermediate housing should be secured.
- Urban design: The design and layout is strongly supported and is aligned with the High Road West Masterplan Framework. The density is supported, noting the design-led approach undertaken. The residential quality is acceptable.
- Tall buildings: The height and massing proposed can be supported in this plan led location and the scheme would overall comply with the qualitative criteria set out in London Plan Policy D9 in respect of visual, heritage, functional, environmental and cumulative impacts. The architectural and materials quality of tall buildings should be of an exemplary standard.
- Heritage impact: The harm to heritage assets would be less than substantial. This would be clearly and convincingly outweighed by the public benefits proposed by the application.
- Transport: Updated bus trip generation figures should be provided to enable officers to fully assess the impact on bus capacity and clarify whether any mitigation is required. Conditions should secure further details regarding car parking, cycle parking and Road Safety Audits.
- Climate change: The approach to energy, drainage and urban greening is generally acceptable, subject to conditions and obligations.

The full Stage 1 Report is attached as **Appendix 4**. These issues are addressed in the relevant section of the report.

5 LOCAL REPRESENTATIONS

5.1 On 18/11/2021, notification was sent to the following:

2,892 Letters to neighbouring properties
13 site notices erected in the vicinity of the site

5.2 A further consultation was carried out following the submission of revised information on 03/02/2022 notification was sent to the following:

3,165 Letters to neighbouring properties
10 site notices erected in the vicinity of the site

5.3 The number of representations received from neighbours, local groups etc. were as follows:

No of individual responses: 269
Objecting: 259 (including Cannon Road Residents' Association and Love Lane Residents' Association and 17 individuals).
Others: 6.

5.4 Further details of neighbour representations and the officer response are set out in **Appendix 3.**

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

Objections:

- The loss of local businesses
- The proposed development does not re-provide Use Class B2 space for the industrial business that will be lost
- The loss of existing affordable homes not being accounted for in the provision of affordable housing and a lack of affordable housing provided overall.
- Loss of parking for attending match days
- Adverse impact on congestion and traffic due to influx of residents
- There will be a greater strain on local services and transport due to the number of units proposed
- The development brings no benefits to the local community
- The development results in the loss of local jobs for local people

- The proposed blocks are too tall
- The loss of homes for local landlords and tenants
- Impact on neighbour amenity on match days
- Provides too many flats
- Loss of the GRACE fellowship
- The redevelopment limits the ability of existing residents to stay in the area

Support:

- Regeneration of the area
- Provision of modern housing
- Provision of community facilities

6 MATERIAL PLANNING CONSIDERATIONS

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

1. Principle of the Development
2. Development Density
3. Affordable Housing
4. Development Design
5. Residential Quality
6. Social and Community Infrastructure
7. Child Play Space
8. Heritage Conservation
9. Amenity Impacts
10. Transportation and Parking
11. Energy, Climate Change and Sustainability
12. Flood Risk, Drainage and Water Infrastructure
13. Air Quality
14. Wind and Microclimate
15. Trees
16. Urban Greening and Ecology
17. Waste and Recycling
18. Land Contamination
19. Basement Development
20. Archaeology
21. Fire Safety and Security
22. Equalities
23. Other matters
24. Conclusion and Planning Balance

6.2 Principle of the development

Policy Background

6.3 The current National Planning Policy Framework NPPF was updated in July 2021. The NPPF establishes the overarching principles of the planning system, including the requirement of the system to “drive and support development” through the local development plan process.

The Development Plan

6.4 For the purposes of S38(6) of the Planning and Compulsory Purchase Act 2004 the Development Plan comprises the Strategic Policies Development Plan Document (DPD), Development Management Policies DPD, the Tottenham Area Action Plan (AAP) and the London Plan (2021).

6.5 . The application site is located within a strategically allocated site - NT5 (High Road West). A key policy requirement of the site allocation is that proposed development within NT5 should accord with the principles set out in the most up-to-date Council-approved masterplan. This is the High Road West Masterplan Framework (HRWMF), which is discussed in detail below.

6.6 The Council is preparing a new Local Plan and consultation on a Regulation 18 New Local Plan First Steps document took place between 16 November 2020 and 1 February 2021. The First Steps document sets out the key issues to be addressed by the New Local Plan, asks open question about the issues and challenges facing the future planning of the borough and seeks views on options to address them. Owing to the early stage that the plan is at, very limited weight can be given to the emerging Local Plan.

The London Plan

6.7 The London Plan is the overall strategic plan for London, setting out an integrated economic, environmental, transport and social framework for the development of London over a 20–25 year period. The London Plan (2021) sets out several objectives for development in London, through numerous policies. The policies in the London Plan are accompanied by a suite of Supplementary Planning Guidance documents (SPGs).

Upper Lee Valley Opportunity Area Planning Framework

6.8 The Upper Lee Valley Opportunity Area Planning Framework (OAPF) (2013) is supplementary guidance to the London Plan. A Development Infrastructure Study (DIFS) in relation to the OAPF was also prepared in 2015. The OAPF sets out the overarching framework for the area, which includes the application site.

6.9 The OAPF notes the redevelopment of the High Road West area is supported by a comprehensive masterplan. The OAPF sets out the ambitions for the High Road West area to become a thriving new destination for north London, with a sports, entertainment and leisure offer supported by enhanced retail, workspace and residential development.

The Local Plan

6.10 The Strategic Policies DPD sets out the long-term vision of how Haringey, and the places within it, should develop by 2026 and sets out the Council's spatial strategy for achieving that vision. The Site Allocations (DPD) and AAP supplement the delivery of the Borough's spatial strategy by allocating sufficient sites to accommodate development needs.

Strategic Policies

6.11 The site is located within the Northumberland Park Area of Change as per Haringey's Spatial Strategy Policy SP1. The Spatial Strategy makes clear that in order to accommodate Haringey's growing population, the Council needs to make the best use of the Borough's limited land and resources by making efficient use of land.

6.12 Policy SP1 requires that development in Growth Areas maximises site opportunities, provides appropriate links to, and benefits for, surrounding areas and communities, and provide the necessary infrastructure and be in accordance with the Council's other planning policies and objectives.

Tottenham Area Action Plan

6.13 The Tottenham AAP sets out a strategy for how growth will be managed to ensure the best quality of life for existing and future Tottenham residents, workers and visitors. The plan sets area wide, neighbourhood and site-specific allocations.

6.14 The AAP indicates that development and regeneration within Tottenham will be targeted at four specific neighbourhood areas including North Tottenham, which comprises Northumberland Park, the Tottenham Hotspur Stadium and the High Road West area.

NT5 Site: High Road West

6.15 The Policy NT5 (High Road West) site allocation covers approximately 11.69ha and calls for a master planned, comprehensive development creating a new residential neighbourhood (with an indicative development capacity including 1,200 dwellings, 4,353 sqm of commercial floorspace, 11,740 Town Centre Units and 1,200 square metres of floorspace in other uses) and a new leisure destination for London. The residential-led mixed-use development is expected to include a new high-quality public square and an expanded local shopping centre, as well as an uplift in the amount and quality of open space and improved community infrastructure.

6.16 The NT5 site allocation contains site requirements, development guidelines and sets out the steps for undertaking estate renewal. These are set out below.

NT5 Site Requirements

The site will be brought forward in a comprehensive manner to best optimise the regeneration opportunity.
Development should accord with the principles set out in the most up-to-date Council-approved masterplan.
Creation of a new residential neighbourhood through increased housing choice and supply, with a minimum 1,400 new homes of a mix of tenure, type and unit size (including the re-provision of existing social rented council homes, the offer of alternative accommodation for secure tenants, and assistance in remaining within the area for resident leaseholders from the Love Lane Estate).
Creation of a new public square, connecting an enhanced White Hart Lane Station, and Tottenham High Road, to complement the redeveloped football stadium.
New retail provision to enlarge the existing local centre, or create a new local centre, opposite to and incorporating appropriate town centre uses within the new stadium, including the new Moselle public square. This should complement not compete with Bruce Grove District Centre.
Enhance the area as a destination through the creation of new leisure, sports and cultural uses that provide seven day a week activity.
Improve east-west pedestrian and cycling connectivity with places such as the Northumberland Park Estate and Lee Valley Regional Park.
The site lies within the North Tottenham Conservation Area and includes listed and locally listed buildings. Development should follow the principles under the 'Management of Heritage Assets' section of the APP.
Where feasible, viable uses should be sought for existing heritage assets, which may require sensitive adaptations and sympathetic development to facilitate.
Deliver new high-quality workspace.
Increase and enhance the quality and quantity of community facilities and social infrastructure, proportionate to the population growth in the area, including:

A new Learning Centre including library and community centre;
Provision of a range of leisure uses that support 7 day a week activity and visitation; and
Provision of a new and enhanced public open space, including a large new community park and high-quality public square along with a defined hierarchy of interconnected pedestrian routes.

NT5 Development Guidelines

Produce a net increase in the amount and the quality of both public open space and private amenity space within the area.
To deliver transport improvements including a new, safe and attractive entrance to White Hart Lane Station and improved rail connectivity.
Re-provision of employment floorspace lost as a result of the redevelopment as new leisure, sports and cultural floorspace and as modern, flexible workspaces.
This could be achieved by workspaces with potential to connect to High Road retail properties, and/or through the creation of workspace behind the High Road and the railway arches.

This central portion of the site is in an area of flood risk, and a Flood Risk Assessment should accompany any planning application.
This site is identified as being in an area with potential for being part of a Decentralised Energy (DE) network. Development proposals should be designed for connection to a DE network, and seek to prioritise/secure connection to existing or planned future DE networks, in line with Policy DM22.
Create a legible network of east-west streets that connect into the surrounding area, existing lanes off the High Road, and open spaces.
Establish clear building frontages along the High Road and White Hart Lane to complement the existing character of the Local Centre.
Incorporate a range of residential typologies which could include courtyard blocks of varying heights and terraced housing.
In the part of the site facing the new stadium, development should respond to both the existing High Road Character and the greater heights and density of the new stadium. This needs to be carefully considered given the height differential between the existing historic High Road uses and future stadium development.
Larger commercial and leisure buildings should be located within close proximity to the new public square linking the station to the stadium.
Due to the size of the site and scale of development envisaged, particular consideration of the effect of the works on the nearby communities, including how phasing will be delivered. This is referenced in the High Road West Masterplan Framework (HRWMF).
Where development is likely to impact heritage assets, a detailed assessment of their significance and their contribution to the wider conservation area should be undertaken and new development should respond to it accordingly.
The Moselle runs in a culvert underneath the site and will require consultation with the Environmental Agency.

6.17 The Tottenham Hotspur Football Club (THFC) Stadium is the first stage of regeneration of the wider area. The intention is for it to fully integrate with the comprehensive regeneration of High Road West and Northumberland Park. A priority is to ensure that on match and non-match days, the area is lively and attracts people to area. This includes, but is not limited to, urban realm improvements, new community facilities, leisure, retail and other commercial uses to build upon and cement the area's reputation as a premier leisure destination in North London.

High Road West Master Plan Framework (HRWMF)

6.18 Policy AAP1 (Regeneration and Master Planning) states that:

6.19 "A. The Council expects all development proposals in the AAP area to come forward comprehensively to meet the wider objectives of the AAP. To ensure comprehensive and coordinated development is achieved, masterplans will be required to accompany

development proposals which form part of a Site Allocation included in this Plan. Applicants will be required to demonstrate how the proposal:
a Contributes to delivering the objectives of the Site, Neighbourhood Area, and wider AAP;
b Will integrate and complement successfully with existing and proposed neighbouring developments; and
c Optimizes development outcomes on the site

B. The Council will direct development to Growth Areas and Areas of Change, and will support planning applications which accord to the delivery of Neighbourhood Objectives, and site requirements. Planning applications for development within the Tottenham AAP area should promote the positive regeneration of Tottenham, in line with the principles of the Strategic Regeneration Framework.

C. The Council will take a proactive approach to working with landowners, the Mayor of London, existing site users, the local community and other interested parties to help deliver the changes needed in Tottenham to meet the shared vision for the regeneration of Tottenham.

D. Development proposals will be expected to provide a range of types and sizes of homes, create inclusive and mixed communities within neighbourhoods, create economic opportunities for local residents and businesses, improve and enhance the local environment, and reduce carbon emissions and adapt to climate change, in accordance with the other policies of this AAP and Haringey's Local Plan."

6.20 The current approved High Road West Master Plan Framework (HRWMF) is that prepared by Arup in September 2014. The Framework sets the vision, details the context, opportunities and constraints for the master plan area, through engagement with the local. The framework also establishes key principles to guide development proposals in the masterplan area and illustrates what a development that responds to the vision, context and key principles could look like. The framework defers the provision of a detailed masterplan to the "eventual outline planning application for the site" but notes that it must adhere to the key principles set out in the Framework. Key principles include quantum of development, massing, heights of buildings and land uses.

6.21 The Vision *"is to create a vibrant, attractive and sustainable neighbourhood and a new sports and leisure destination for North London."*

6.22 The objectives of the framework are to:

Create a safe, secure and attractive place to live
Deliver a high quality public realm network
Be a well connected place
Be a prosperous hub for business
Be a low carbon development
Support cultural diversity
Become a new leisure destination

6.23 The framework design concept centres on the creation of a sequence of places that increase density and activity whilst retaining local character and scale, linked by a new north-south route that forms the spine of the neighbourhood. The spine connects Moselle Square (a mixed use community and leisure destination with high density residential development centred on a new entrance to White Hart Lane), Peacock Gardens (a medium density residential neighbourhood around a new community park), White Hart Lane (retail and mixed use development that includes community facilities centred around improved public realm providing a unique setting to reactivate heritage buildings), Peacock Mews (new living and workspaces behind High Road and White Hart Lane) and The High Road (traditional high street with a range of shops and flats and new learning centre opposite the new THFC stadium) (figure 5).



Figure 5: 2014 masterplan illustrative character areas.

6.24 The plan includes the delivery of a new public square (Moselle Square) providing high quality amenity whilst creating a clear route for match day and non match day visitors to THFC. The masterplan also provides a framework for the delivery of a new linear public park (Peacock Park) providing a range of community and outdoor play space. The topology of the framework envisages buildings that reflect the scale of the buildings fronting High Road and White Hart Lane and increasing in height and scale on an east to west axis, with the tallest buildings being adjacent to the railway line.

6.25 The Masterplan framework considers 3 options proposed to deliver between 600 and 1,650 new homes and 600 new jobs.

6.26 The principles of the masterplan include:

6.27 Character and Urban Form

Creating a legible network of east- west streets that connect to the surrounding area
Create attractive north-south links behind the High Road
Complement the scale of the proposed street layout with appropriate building heights
Establish clear building frontages along White Hart Lane
Incorporate a range of residential typologies including courtyard blocks and varying heights and terraced housing
Develop a ‘behind the High Road’ workspaces typology
Reflect the scale and impact of the new Tottenham Hotspur Football Club Stadium by locating larger commercial and leisure buildings opposite
Demonstrate clear definition of fronts and backs of buildings, public spaces and active street frontages
Establish a simple palette of high quality materials that includes the significant use of brick
Enhance the heritage value contribution of High Road

6.28 Heritage

Preserve and enhance the character of the Conservation Area as a whole
Demonstrate how heritage significance of existing assets has been incorporated and reinforced
Promote the adaptable reuse of heritage assets
Demolition can be considered where benefits of change and sympathetic new development can enhance the overall viability of the development
The impact of loss of heritage assets on the wider conservation and appearance of setting of retained assets should be demonstrated

6.29 Open Space

Provision of a new public square located south of White Hart Lane as a focus for new leisure and community buildings
A high quality pedestrian route connecting the new White Hart Lane Station entrance to the High Road
Provision of new high quality public realm around the new station and arches
Public realm enhancements to White Hart Lane to create a setting for heritage assets
New community park north of White Hart Lane which includes safe child play areas and sports uses
Integration of child play areas in shared private courtyards
Provision of allotments in roof top gardens and the community park
Clear network of streets
Strengthen pedestrian links to open spaces outside the masterplan
Enhance biodiversity and incorporate living roofs and walls
Promote health and well being through access to high quality open spaces
Create a legible network of streets
Transport and Movement

Preserve opportunities for connections to the west over the railway line
Integrate and improve accessibility to bus services
Locate more intensive land uses in close proximity to transport nodes
Integrate traffic calming measures
Improve and enhance access to White Hart Lane Station
Integrate the station into active public realm
Seek enhancements to public transport services
Integrate cycle lanes and parking that connect to wider routes

6.30 Land Use

Commercial leisure development between the new station and entrance to High Road
Retail uses reinforcing the role of High Road
Activation of the railway arches with workspace, retail and food and beverage uses
Creation of workspace behind the High Road with mews and courtyard type development
Location of a new community ideas store on the High Road and new Moselle Square
Residential development focused north of White Hart Lane

6.31 Homes

Provide a mix of housing sizes, types and tenures

Re-provide all social rented homes for all affected Council tenants
Achieve appropriate residential densities corresponding to the guidelines set out by the Mayor in relation to public transport accessibility levels (currently up to 700 habitable rooms per hectare)
Building new homes along traditional street patterns that sit within attractive public realm
Create a consistent architectural expression
Meet the London Housing Design Guide (LHDG) minimum space standards
Following LHDG for privacy, dual aspect dwellings, noise, floor- ceiling heights, daylight and sunlight
Implement LHDG on climate change mitigation
All new homes should have access to high quality open space
Implement secure by design principles

6.32 Parking

Provide residential parking within 100 metres of the front door of all residential properties
Podium parking will be well lit, safe and secure with clear entry and exit points
On street parking will be integrating into the streetscape as part of traffic calming
Large areas of surface parking will not be acceptable
A multi-storey car park is required to meet the demands of the commercial and leisure uses
Plots with podium parking are concentrated predominantly along with western edge
Improve local cycling infrastructure network in the area through the integration of safe cyclelanes and wayfinding

6.33 Community Benefits and Social Infrastructure

Provide appropriate levels of social infrastructure in the phased delivery of development
Create a community hub with learning and enterprise functions
Create community and leisure facilities for people of all ages
Improve access to services, open space, play space, sports facilities, outdoor gyms and community spaces for events and activities that contribute to healthy lifestyles

6.34 Employment

Phased provision of improved workspaces around the Peacock Industrial Estate to allow appropriate businesses to expand and evolve
A workspace typology that provides opportunities to link workspaces behind the High Road with retail units
Located B1b and B1c uses under residential uses and move B2 uses into existing industrial employment areas
Create a net increase in jobs and business opportunities in the area

Provide a range of retail and commercial units to encourage and create mix and wider retail offer

6.35 Massing

Tall buildings will only be considered in parts of the masterplan area where the existing character would not be affected by the scale, mass or bulk of the tall building
Taller buildings placed towards the railway line, away from High Road
Building massing falls towards White Hart Lane to create an appropriate heritage setting for the heritage assets
Taller buildings located to minimise overshadowing of adjacent development
Taller buildings used as part of way finding and movement strategy
Bulkier building massing located towards the new stadium
Key views of the stadium considered and maintained in the profile of buildings

6.36 Low Carbon Development

Integrate an efficient supply of heating and cooling to and within the High Road west site
Safeguard a connection from the energy centre to the emerging Lee a Valley Heat Network
Provide a site wide decentralised energy network
Implement renewable energy infrastructure
Outline the reuse of existing utilities infrastructure and/or proposals to upgrade the infrastructure
Maximise carbon dioxide reduction
Achieve appropriate daylight and sunlight levels and avoid overshadowing and wind tunnelling effects
Provide high quality homes and development that are adaptable to future changes in climate

6.37 Phasing and Implementation

Phasing should aim to minimise disruption to the local community and businesses
Phases should be large enough to enable neighbours to move together so that the community is retained, and support networks kept in tact
Phasing should ensure that Love Lane residents who are eligible for a new home only have to move once
A strategy should be put in place to ensure vacant land that is not ready for development is utilised in a creative way for the good of the community

7 Policy Assessment

Contribution to Regeneration

7.1 The proposal provides the opportunity to tackle the entrenched social and economic barriers that residents face in North Tottenham and deliver on the benefits the community have identified through consultation, such as good quality affordable homes, jobs and training and new and improved community and leisure facilities. Delivery of the scheme would represent a significant step forward in progressing the Council's and the community's ambition to ensure that north Tottenham is a fairer, healthier place where all our residents can thrive.

7.2 The scheme represents a substantial and far-reaching investment, which expects to deliver the following benefits:-

- Over 2,500 high-quality, sustainable homes, including 500 council owned social rent homes and 40% affordable housing.
- £10m of funding for social and economic support for both businesses and residents, ensuring the local community benefit from the Scheme
- A cutting edge new Library and Learning Centre and a refurbished Grange Community Hub which will provide improved community facilities early in the Scheme.
- Around 143,000sqft of green spaces for the community including a large new community park with an outdoor gym, children's play area and Grange Gardens: a safe, central green space for local people.
- A welcoming new civic square which will be an important focus of local events and activities, bringing the community together, promoting cultural activities and enhancing activity and safety at night.
- Over 130,000sqft of commercial, retail and leisure space throughout the Scheme providing a wide range of leisure, employment space, shops, cafes and restaurants around a new civic square.
- £500k of investment in the town centre and a £500k fund for events and activities, as well as meanwhile uses which will revitalise the local centre during construction and afterwards.
- Over 3,300 construction jobs and more than 500 end-user jobs once the development is complete.

7.3 There is therefore strong policy support for the regeneration benefits of the proposal as set out in AAP1 subject to the details assessed below.

Principle of Comprehensive Development

7.4 Policy AAP1 (Regeneration and Master Planning) makes clear that the Council expects all development proposals in the AAP area to come forward comprehensively to meet the wider objectives of the AAP. It goes on to state that to ensure comprehensive and coordinated development is achieved, masterplans will be required to accompany development proposals which form part of a Site Allocation included in the AAP and that applicants will be required to demonstrate how any proposal:

Contributes to delivering the objectives of the Site, Neighbourhood Area, and wider AAP;
Will integrate and complement successfully with existing and proposed neighbouring developments; and
Optimises development outcomes on the site.

7.5 Policy DM55 states: "*Where development forms part of an allocated site, the Council will require a masterplan be prepared to accompany the development proposal for the wider site and beyond, if appropriate, that demonstrates to the Council's satisfaction, that the proposal will not prejudice the future development of other parts of the site, adjoining land, or frustrate the delivery of the site allocation or wider area outcomes sought by the site allocation".*

7.6 Policy NT5 makes clear that 'development should accord with the principles set out in the most up-to-date Council approved masterplan', which as discussed above, is the approved HRWMF prepared by Arup in September 2014. This is therefore an important aspect of development plan policy when determining planning applications.

7.7 Paragraph 4.6 of the AAP states that Haringey wants to ensure development proposals do not prejudice each other, or the wider development aspirations for the Tottenham AAP Area whilst enabling the component parts of a site allocation to be developed out separately. High Road West and the various sites north of White Hart Lane are expressly set out in Table 2 of Policy AAP1 as requiring a comprehensive redevelopment approach.

7.8 Paragraph 4.9 of the AAP states that a comprehensive approach to development will often be in the public interest within the Tottenham AAP area. It goes on to state that whilst incremental schemes might be more easily delivered, the constraints proposed by site boundaries, neighbouring development or uses and below-ground services all have potentially limiting consequences for scale, layout and viability.

7.9 The applicant is proposing comprehensive development of the majority of the High Road West Allocation (with the exemption of the former Cannon Rubber Factory site) which has been developed pursuant to planning permission HGY/2012/2128. The proposals have been informed by extensive community and key stakeholder engagement. The adopted comprehensive approach facilitates the optimisation of the site, the timely and co-ordinated delivery of the development, the maximisation of on-site benefits and delivery on the HRWMF/ AAP vision and principles.

7.10 In respect to site assembly, there are several landowners with interests in the outline part of the site with the Council owning the majority of land to the southern part of the site. Policy AAP2 of the Tottenham AAP states that the Council will support land assembly to

achieve comprehensive development, and will use compulsory purchase (CPO) powers, only where necessary, to assemble land for development within the Tottenham AAP area. CPO will be used where landowners and developers can demonstrate that they have a viable, deliverable and Local Plan compliant scheme; and have made all reasonable attempts to acquire, or secure an option over, the land/building(s) needed, through negotiation. The comprehensive redevelopment of the assembled will deliver the site's allocation and AAP objectives by securing the optimum use of land, the proper planning of development (in terms of layout, design, and use) and supporting the achievement of wider regeneration initiatives or objectives.

7.11 Consideration will be given to the use of compulsory purchase powers, to facilitate the comprehensive delivery of the outline part of the site and the proposal is considered to meet the relevant criteria for a CPO subject to reasonable attempts to secure land through negotiation not succeeding. The site encompasses several other parcels, within the site allocation, that have extant permissions/ resolution to grant planning permission including the Goods Yard, Depot and Former Print Works sites. The submitted parameters plans and design code accommodates the independent delivery of these sites.

Principle of Provision of Housing

7.12 London Plan Policy H1 sets a 10-year target (2019/20-2028/29) for the provision of 522,870 new homes across London as a whole and 15,920 for Haringey.

7.13 Local Plan Policy SP2 states that the Council will maximise the supply of additional housing to meet and exceed its minimum strategic housing requirement.

7.14 The Tottenham AAP identifies and allocates development sites with the capacity to accommodate new homes. The High Road West area is allocated in the AAP (NT5) as an appropriate place for residential led mixed use development providing a minimum of 1,400 homes (a net increase of 1,200 homes) amongst other uses. Of the 1,400 dwellings anticipated, 222 homes have already been developed in the form of the Cannon Road housing area (HGY/2012/2128). This leaves a minimum of 1,178 dwellings still to be provided.

7.15 Given the above, the principle of the provision of new homes on the site (alongside a mix of other uses) is supported. The proposed scheme would deliver up to 2,929 homes (2,600 net additional). This is 5,858 additional homes when taking account of the extant Goods Yard and Depot Site permissions and would provide 17% of the number of homes required to be delivered within the current London Plan 10-year housing target timeframe.

7.16 The ES (Chapter 14) reports on an assessment of the likely significant socio-economic effects of the proposed scheme, including housing delivery and concludes that the proposed

new homes would have a major beneficial effect at the local level and a substantial beneficial effect at the borough level. Officers agree with this assessment.

Loss of Existing Retail

7.17 London Plan Policy SD7 seeks to realise the full potential of existing out of centre low-density retail and leisure parks and commercial sites to deliver housing intensification. Policy SP10 seeks to protect and enhance Haringey's town centres, according to the borough's town centre hierarchy and Policy DM41 promotes new retail spaces in town and local centres. AAP Site Allocation NT5 sets out that the site will enlarge the existing North Tottenham Local Centre or create a new local centre.

7.18 There is currently 13,195 sqm (GEA) of class E (a-b) floorspace within the High Road West site, predominantly hot food takeaways and convenience stores. This includes the B&M (circa 7,000 sqm GEA) and five small retail units located in the northernmost part of the site.

7.19 The proposed loss of the existing out-of-centre large retail store and smaller retail units is consistent with the development plan's 'town centres first' approach to retail provision and the Site Allocation, therefore is acceptable in principle. The proposed scheme includes between 6,225 and 22,000 sqm (GEA) of flexible commercial (E Class) uses, between 4,000 and 7,800 sqm (GEA) is proposed in the E (a-c) Use Classes), discussed below. The exact quantum and distribution of this floorspace is not known at this stage but is likely to predominantly comprise of smaller retail units and larger food and beverage units, suitable for independent local businesses. The existing floorspace, by use class, minimum floorspace parameters and net change in floorspace provision, by use class, is set out in table 5 below. This is in line with the AAP aspiration of providing up to 11,740 sqm of Town Centre Uses within the masterplan area, notwithstanding the proposed net loss of between 1,200 sqm and 9,195 (GEA) retail floorspace. It is envisaged that the proposed residential development would provide further support for the existing and proposed commercial units in the locality, contributing positively to the vitality and viability of the Local Centre.

Loss of community uses

7.20 Policy DM49 states that the Council will seek to protect existing social and community facilities unless a replacement facility is provided which meets the needs of the community.

7.21 The proposal will result in the demolition of the existing health centre floorspace (900 sqm GEA), library floorspace (500 sqm GEA), community hall floorspace (1,125 sqm GEA) and public house floorspace (1,195 sqm GEA).

7.22 The proposal includes between 0 – 1,000 sqm of healthcare floorspace (E(e)). Between 1,000 and 6,000 sqm of class F floorspace, including between 500 and 3500 sqm of library (F1 (d)) floorspace and 500 – 2,500 sqm of community hall (F2 (b)) floorspace is proposed.

Between 0 and 3,000 sqm GEA of public house and 0 – 3,000 sqm GEA of cinema floorspace is proposed. The proposal could therefore deliver a net gain of education/ community centred uses. This includes the provision of a new Library and Learning Centre and potential for leisure, cinema and or public house floorspace. The S106 will ensure that a replacement healthcare facility is delivered, prior to demolition of the existing centre, and will meet the needs of future population as request by the CCG. The overall quantum of community floorspace proposed is considered to be acceptable.

Loss of Existing Industrial Premises/Land

7.23 London Plan Policy E4 requires a rigorous approach to industrial land management, identifies that sufficient land and premises need to be retained for industrial and related functions but recognises that managed release may be required to provide other uses, in appropriate locations.

7.24 Policy SP8 supports the Borough-wide provision of office/light industrial floorspace as part of mixed-use development on suitable sites. Policy SP9 also supports the diversification of the borough's economy by supporting small and medium sized enterprises and new and expanding employment sectors. Policy DM40 seeks to facilitate the renewal and regeneration (including intensification) of existing employment land and floorspace in accessible locations.

7.25 The site includes approximately 11,750 square metres (GEA) of commercial floorspace in the B2/B8 use classes and a further 1,790 square metres in the E (g) use class, occupied by around 85 businesses. The proposal includes between 0 – 7,000 sqm (GEA) of B2 floorspace, between 0 – 1,000 sqm (GEA) of B8 floorspace and between 1,525 and 7,200 sqm (GEA) of E (g) floorspace, with a minimum of 4,686 sqm (GEA) of floorspace being delivered within the B2, B8 or E (g) use classes.

7.26 Given the Site Allocation NT5 seeks to deliver new high quality workspace and the proposed scheme incorporates flexible commercial space, including some replacement employment floorspace (as discussed below) the loss of existing office, light/general industrial floorspace is acceptable in principle. It is recommended that s106 planning obligations secure the implementation of an approved relocation strategy to assist with temporary and permanent relocation of existing businesses operating on the site to new premises within the development, or failing that, to other locations in the Borough.

Loss of short-term accommodation

7.27 Policy DM15 states that proposals for development that would result in the loss of special needs housing will only be granted permission where it can be demonstrated that

there is no longer an established local need for this type of accommodation or adequate replacement accommodation will be provided.

7.28 Whitehall Lodge currently operates as a C1 (hostel), providing emergency temporary accommodation. The use was established on a temporary basis and is proposed to be re-located, by Homes for Haringey to a site nearby. There would be no conflict with Policy DM15.

Table 5: Existing floorspace, minimum proposed floor space and net additional floorsapce based on the minimum parameters.

	Existing floorspace (m2)	Minimum Masterplan floorspace (m2)	Net Additional Floorspace (m2)
Industrial - B2	10,800	0	-10,800
Industrial - B8	950	3,161	+2,211
Retail - E(a)	*9,060*	*n/a*	*n/a*
Food consumption – E(b)	*4,135*	*n/a*	*n/a*
Commercial, professional (other than medical) or financial services - E(c)	*0*	*n/a*	*n/a*
Total flexible retail - E(a - c)	13,195	4,000	-9,195
Indoor sports recreation and fitness - E(d)	0	500	+500
Medical/healthcare - E(e)	900	0	-900
Business uses (offices) - E(g)	1,790	1,525	-265
Learning/non-residential institutions - F1(d)	*500*	*n/a*	*n/a*
Public halls or exhibition halls - F1(e)	*0*	*n/a*	*n/a*
Learning/non-residential, public or exhibition halls - F1(d-e)	500	500	0
Place of worship - F1(f)	655	0	-655
Local community uses - F2(b)	1,125	500	-625
Energy centre - Sui Generis	0	200	+200
Public house - Sui Generis	1,195	0	-1,195
Total	**31,110**	**10,386**	**-21,647**

Source: Lendlease

Loss of Existing Housing

7.29 London Plan Policy H8 makes clear that loss of existing housing should be replaced by new housing at existing or higher densities with at least the equivalent level of overall floorspace.

7.30 The proposed development results in the demolition of 279 existing dwellings in the Love Lane Estate.

7.31 The detailed element of the scheme would deliver 60 dwellings. The outline part of the scheme could deliver up to 2,869 dwellings. The illustrative master plan shows the delivery of 2,612 dwellings including 1,696 market dwellings and 916 affordable units (416 shared ownership and 500 social rent). The proposal will deliver a significant uplift in new housing, in accordance with London Plan Policy H8. The reprovision and uplift in affordable housing is assessed in detail below.

Principle of Proposed Flexible Commercial Uses

7.32 Policy DM40 supports proposals for mixed use, employment-led development where necessary to facilitate the renewal and regeneration of existing non-designated employment sites within highly accessible or otherwise sustainable locations. All proposals for mixed use development must also satisfy the requirements of Part A of Policy DM38 (maximise amount of employment floorspace, provide improvements to site's suitability for business and employment uses, make provision of affordable workspace (where viable), safeguard residential amenity, not conflict with retained employment use and enable connection to ultra-fast broadband).

7.33 Tottenham AAP Policy NT2 states the Council will support development which increases job density and therefore helps to meet the employment needs of the Borough and enables small firms to start up, and grow, in flexible industrial space. Site Allocation NT5 establishes indicative development capacities for commercial floor space (4,353 sqm) and town centre uses (11,740 sqm) (16,093 sqm overall).

7.34 The principles of the HRWMF seek to create a net increase in jobs and business opportunities in the area, through an increase in commercial space and provision of a range of workspaces as well as providing a range of retail and commercial units to encourage a greater mix and wider retail offer.

7.35 The proposed scheme includes 6,225 - 22,000 sqm (GEA) of flexible commercial uses (Class E). The proposal also includes between 0 and 8,000 sqm (GEA) of B2/B8 floorspace. This includes a minimum provision of 1,525 (GEA) of Use Class E (g) floorspace and a minimum of 4,686 sqm GEA of B2/B8/ E(g) floorspace.

7.36 The proposed amount of commercial floorspace proposed exceeds the NT5 allocated requirements for commercial uses and is generally consistent with guidance in the HRWMF to secure an appropriate provision of B uses.

7.37 It is also recommended that s106 planning obligations to secure the implementation of an approved Employment and Skills Plan to maximise employment and training opportunities for residents from the development (including during the construction phase).

Principle of the Development – Summary

7.38 The provision of a residential-led mixed-use scheme comprising housing and commercial uses is acceptable in principle. The proposal is for comprehensive development of the remaining part of Site Allocation NT5. Whilst the proposal does not wholly accord with all the key principles set out in the HRWMF, notably in respect to a descending scale of building from Brook House, adjacent to the railway line, siting new commercial and leisure buildings opposite the stadium to create a sports and leisure destination for North London, the provision of tennis courts etc in the park, the provision of an increase in commercial floorspace, provision of enhancements and re-use of heritage assets, activation of the railway arches, conforming with London Plan density guidelines (which are no longer applicable, providing residential parking within 100 metres of front doors, provision of a multi-storey car park and podium parking, the proposal will deliver significant social and economic benefits and deliver on the vision set out in the AAP and when taken as a whole, conform with the key principles set out in the HRWMF. This includes, but is not limited to, a significant uplift in new homes, including affordable and accessible homes, energy and water efficient dwellings, significant public realm improvements, new pedestrian and cycle links, new community facilities, new public parks and new job and training opportunities. The proposal is flexible with respect to commercial use provision, that would include the re-provision of at least some of the existing commercial uses with high quality space, suitable for local independent businesses.

7.39 The proposed scheme would result in the loss of existing residential, commercial and community uses across the Love Lane Estate, High Road, Peacock Industrial Estate, Former Depot, Goods Yard and Cranbury Enterprise Park. However, the benefits for the proposed development, including the substantial uplift in housing, community uses and open space and a quantum of replacement commercial floorspace, that could exceed existing, is considered to outweigh the loss.

Development Density

7.40 London Plan Policies H1 and D3 make clear that development must make the best use of land by following a design-led approach that optimises the capacity of sites. The policy states that a design-led approach requires consideration of design options to determine the most appropriate form of development that responds at a site's context and capacity for growth, and existing and planned supporting infrastructure capacity (as set out in Policy D2). In doing so it identifies a number of requirements in relation to form and layout, experience and quality and character.

7.41 A key principle of the HRWMF is to achieve appropriate residential densities corresponding to guidelines set out by the Mayor in relation to public transport accessibility levels.

7.42 The maximum parameters facilitate a residential density of up to 341.7 units/hectare (based on the maximum number of dwellings being delivered on the 8.57 hectare site). The submitted indicative masterplan (which includes both the outline and detailed applications) has a density of 337 units/hectare, which is just below the definition of 'higher density' development in the London Plan (at least 350 units per hectare). The following issues are assessed in different sections of this report:

- Form and Layout – Development Design
- Experience – (safety, security, inclusive design, housing quality and residential amenity) – Development Design, Residential Quality, Impact on Amenity of Adjoining Occupiers and Fire Safety & Security
- Quality and character – Development Design
- Neighbour amenity – Impact on Amenity of Adjoining Occupiers
- Transport infrastructure – Transportation & Parking
- Green infrastructure– Trees and Urban Greening & Ecology
- Social infrastructure – Social & Community Infrastructure

7.43 In summary, the assessment in the above sections finds the proposed scheme to be acceptable, subject to securing necessary mitigation and officers are satisfied that the proposed amount of development does optimise the site's potential to deliver new homes and jobs as part of a new higher density neighbourhood.

7.44 The extant Goods Yard consented scheme has a density of 746 habitable rooms/hectare (270units/hectare) and the extant Depot consented scheme has a density of 798 habitable rooms/hectare (275 units/hectare). The refused Goods Yard and Depot Scheme proposed a density of 1,116 habitable rooms/ha (353 units/hectare).

Dwelling Unit Mix

7.45 London Plan Policy H10 requires new residential developments to offer a range of housing choices, in terms of the mix of housing sizes and types, taking account of evidence of housing need, the requirement to deliver mixed and inclusive neighbourhoods, the need to deliver a range of unit types at different price points and the mix of uses and range of tenures in the scheme. Strategic Policy SP2 and Policy DM11 of the Council's Development Management DPD adopt a similar approach.

7.46 Policy DM11 states that the Council will not support proposals which result in an overconcentration of 1 or 2 bed units overall unless they are part of larger developments or located within neighbourhoods where such provision would deliver a better mix of unit sizes. A key principle around homes set out in the HRWMF is provision for a mix of housing sizes, types and tenures.

7.47 The overall proposed dwelling mix set out in Table 05 below.

Table 06: Proposed dwelling mix in the detailed (Plot A and illustrative masterplan).

Bedroom Size	No. of Units	% by unit
Detailed element (Plot A)		
1 bed (2 person)	15	25%
2 bed (3 & 4 person)	16	26.67%
3 bed (5 person)	25	41.67%
4 bed (6 person)	4	6.67%
Total	60	100%
Illustrative masterplan		
Studio (1 bed 1 person)	85	3.25%
1 Bed 2 person	859	32.89%
2 Bed (3 & 4 person)	1,238	47.40%
3 bed (4, 5 & 6 person)	375	14.36%
4 bed (5 & 6 person)	55	2.10%
Total	**2,612**	**100%**

7.48 The proposed dwelling mix for the detailed part of the site comprises family sized units (48.24%) and 1- and 2-bedroom units (51.67%). The proposed indicative dwelling mix is 83.5% 1 and 2 bed units and 16.5% family sized housing. The final dwelling mix for the outline part of the proposal will be determined at detailed reserved matters stage. The proposed mix is not considered to represent an unacceptable over-concentration of 1- and 2-bedroom units given the site location and is generally consistent with the AAP approach to deliver smaller units in close proximity to public transportation and HRWMF principles. An assessment of the suitability of the dwelling mix, as it relates to affordable housing is contained in the section below.

8 **Affordable Housing**

Policy Background

8.1 Paragraph 60 of the NPPF sets out the Government's objective of significantly boosting the supply of homes that meet the needs of groups with specific housing requirements. Paragraph 63 sets out the government's expectation that in circumstances where affordable housing is required, it is expected to be met on site unless an alternative mechanism can be robustly justified.

8.2 London Plan Policy H5 and the Mayor's Affordable Housing and Viability SPG set a strategic target of 50% affordable housing. Policy H5 identifies a minimum threshold of 35% (by habitable room) affordable housing, whereby applications providing that level of affordable

housing, with an appropriate tenure split, without public subsidy, and meeting other relevant policy requirements and obligations to the satisfaction of the borough and the Mayor, can follow the 'fast track route' set out in the SPG; this means that they are not required to submit a viability assessment or be subject to a late stage viability review. The minimum required affordable housing in order to take advantage of the threshold approach increases to 50% for 'industrial land.'

8.3 London Plan Policy H7 and the Mayor's Affordable Housing and Viability SPG sets out a preferred tenure split of at least 30% low cost rent, with London Affordable Rent as the default level of rent, at least 30% intermediate (with London Living Rent and share ownership being the default tenures), and the remaining 40% to be determined in partnership with the Local Planning Authority and the GLA.

8.4 Policy SP2 of the Local Plan requires developments of more than 10 units to provide a proportion of affordable housing subject to viability to meet an overall borough target of 40%.

8.5 Policy AAP3 sets out the affordable tenure split (DM13 A[b]) in the Tottenham AAP area should be provided at 60% intermediate accommodation and 40% affordable rented accommodation.

8.6 Site Allocation NT5 includes the requirement to create a new residential neighbourhood through increased housing choice and supply, with a minimum 1,400 new homes (1,178 net given the built Cannon Road scheme) of a mix of tenure, type and unit size (including the re-provision of existing social rented council homes, the offer of alternative accommodation for secure tenants, and assistance in remaining within the area for resident leaseholders from the Love Lane Estate).

8.7 Haringey's Housing Strategy 2017-22 (and Haringey's Intermediate Housing Policy statement 2018) provide guidance on the preferred tenure mix for affordable housing across the borough in order to deliver the overall aims of the Local Plan and meet housing need.

8.8 Revisions to the Housing Strategy agreed by Cabinet in February 2019 set out that the Council's preference for General Needs affordable housing is Social Rent or London Affordable Rent and the preference for intermediate rented housing is London Living Rent or Discount Market Rent, at rent levels equivalent to London Living Rent.

Amount, type, location and phasing of Affordable Housing

8.9 The Applicant is committed to delivering a minimum of 35% affordable housing by unit with a target of 40% provision by unit, subject to viability and grant funding. Phase A (to the south of White Hart Lane) is to deliver 40% affordable housing by unit with a tenue split weighted 55% social rent and 45% intermediate. The detailed element (Plot A) is proposing 100% (60 dwellings) as social rent. This includes 15 x 1 bedroomed units (25%), 16 x 2 bedroomed units (27%), 25 x 3 bedroomed units (42%) and 4 x 4 bedroomed units (6%).

8.10 The affordable housing statement that accompanies the application details an affordable housing split, based on the indicative scheme of 2,612 dwellings, across 27 blocks.

Overall residential tenure mix.

Table 07: Proposed residential component

Tenure	Units	Hab Rooms	% Hab Rooms
Private	1696 (64.9%)	4439	60.5%
Shared ownership	500 (54.6%)	1164	15.9%
Social rent	416 (45.4%)	1730	23.6%
Total	2612 (100%)	7333	100%

8.11 Tenure Split: The scheme proposes 59.8% Low-Cost Rent and 40.2% Intermediate by habitable room as set out in Table 08 below.

Table 08: Proposed Affordable Housing Tenure Split

Tenure	Units	Hab Rooms	% Hab Rooms
Social Rent	500	1730	59.8%
Shared Ownership	416	1164	40.2%
Total	916	2894	100%

8.12 Unit Size Mix: The scheme proposes a mix of affordable housing unit sizes including 44% family sized (3 bed+) Low-Cost Rent homes, as set out in Table 09 below.

Table 09: Proposed Affordable Housing Dwelling Mix

	1-bed	2-bed	3-bed	4-bed	Total
Social Rent	55	225	165	55	500
	11%	45%	33%	11%	100%
Shared Ownership	126	248	42	0	416
	30%	60%	10%	0	100%

8.13 Distribution: The affordable housing is envisaged to be distributed across the site in various buildings, as outlined in Table 10 below with mixes throughout buildings and expected phases. This will ensure an inclusive and mixed community in accordance with Policy DM11.

Table 10: Indicative Proposed Tenure Distribution

Plot	Market	Social Rent	Shared Ownership	Total
M2	0	0	30	30
L1	89	0	54	143
J1	95	0	60	155
A (detailed element)	0	60	0	60
G	0	40	0	40
H	0	0	26	26
N2,N3 & N4	50	0	56	106
N1	0	0	43	43
C1	11	168	0	179
D	380	0	0	380
M1	205	0	5	210
F	280	91	74	445
M3	31	0	0	31
K	140	0	0	140
J2	84	0	0	84
L2	89	0	0	89
I	0	0	68	68
C	52	0	0	52
B	190	141	0	331
Total	1,696	500	416	2,612

8.14 Design & Management: All proposed homes would be designed so they are 'tenure blind' and there would be no discernible difference in external appearance of homes in different tenures. The proposed affordable homes would be managed by a Registered Provider of Affordable Housing or The Council and have access to the same amenities and open space as the market units. The scheme will be designed to ensure estate service charges are as affordable as possible, whilst allowing all residents the right to access on-site amenities.

Affordability

8.15 It is envisaged that the affordable housing split would be 55% social rent and 45% shared ownership. In the indicative masterplan scheme providing 2,612 dwellings, 500 would be social rent and 416 shared ownership. Albeit the Landlord Offer for existing resident leaseholders may result in up to 46 of the shared ownership units being delivered as shared equity units. For clarity, in a shared equity arrangement, a tenant would own a leasehold for a proportion of the property with the remaining portion owned by a registered provider but unlike shared ownership, there would be no rent payable on the registered providers equity and no requirement for the registered provider to offer the tenant opportunity to purchase further equity in the property.

8.16 The shared ownership units are anticipated to be sold at the minimum 25% and a maximum of 75% share of equity. The tenant is then charged rental on the unsold equity (the equity owned by the registered provider (typically up to 2.75% (plus service charges)). In line with the current London AMR the household income threshold would not exceed £90,000. The proposal seeks to meet Haringey's Intermediate Housing Strategy requirement of utilising a cascade arrangement for offering the shared ownership units, firstly by offering 1 -2 bedroomed shared ownerships will be made available for gross household incomes of £,40,000 - £60,000 per annum and then to households with gross incomes that do not exceed £90,000 per annum. It is proposed that units would target a range of incomes dependent on the unit size and will prioritise those who live and/or work in the borough. Whilst the final offer will be established at reserved matters stage, the s106 agreement will secure maximum feasible delivery of affordable housing through staged viability reviews. A s106 planning obligation will to ensure that marketing of the proposed Shared Ownership homes prioritises households living or working in Haringey with maximum annual incomes lower than the maximum £90,000 and lower incomes set out above.

8.17 Whilst the applicant's affordable housing offer is not in line with the amended Housing Strategy and Intermediate Housing Policy (June 2018), insofar as the intermediate tenure is proposed to be all shared ownership or share equity, the proposed affordable housing offer is considered to be acceptable and will achieve the objectives of The Tottenham AAP Policy AAP3 to Improve the quality and range of affordable housing options, address housing needs in Haringey; secure a more inclusive and mixed, sustainable community; and increase housing delivery in Tottenham.

Viability Review

8.18 The application is accompanied by a viability appraisal that sets out that the maximum level of affordable housing that can be supported by the proposed development, the appraisal finds that the illustrative schemes delivery of 35% affordable housing delivery exceeds the maximum contribution required by the viability appraisal. The appraisal is based on the delivery of the illustrative scheme with an estimated present day build cost of £73,233,798, an estimated existing use value of £73,653,250. An estimated CIL charge of £10,000,000, a compensation cost (confidential) and an estimated S106 cost of £1,253,650.

8.19 The applicant's viability appraisal has been independently reviewed by BNP Paribas Real Estate. The review sets out that the estimated viability of the scheme is contingent on the number of dwellings and amount of residential floorspace proposed and therefore it is considered essential that the scheme viability is revised upon the submission of reserved matters applications. The review also found a viability deficit and recommends securing early, middle and late-stage reviews via legal agreement.

8.20 In accordance with London Plan Policy H5, it is recommended that s106 planning obligations secure an Early-Stage Viability Review and late stage review. It is also recommended that these secure a Development Break Review – requiring a review if an approved scheme were implemented, but then stalled for 30 months or more. These reviews would enable the provision of affordable housing to increase up to 40% (by habitable room) subject to future market conditions and delivery timescales. It is also recommended that a planning condition is attached requiring viability addendum reports to be submitted with the reserved matters submissions.

8.21 As outlined in Section 7 below, the Council is proposing to increase the current Haringey CIL charge rate for the Eastern Zone of the borough from £15 to £50 per square metre, subject to Full Council approval. An approved development would be liable to pay the Haringey CIL rate that is in effect at the time that a permission is granted.

Loss of existing housing and estate redevelopment

8.22 London Plan Policy H8 makes clear that demolition of affordable housing, including where it is part of an estate redevelopment programme, should not be permitted unless it is replaced by an equivalent amount of affordable housing floorspace.

8.23 Policy H8 sets out that demolition of affordable housing, including where it is part of an estate redevelopment programme, should not be permitted unless it is replaced by an equivalent amount of affordable housing floorspace. Affordable housing that is replacing social rent housing must be provided as social rent housing where it is facilitating a right of return for existing tenants. Where affordable housing that is replacing social rent housing is not facilitating a right of return, it may be provided as either social rent or London Affordable Rent housing. Replacement affordable housing should be integrated into the development to ensure mixed and inclusive communities.

8.24 A key NT5 site requirement is the re-provision of existing Social Rented Council homes arising from the demolition of the Love Lane Estate.

8.25 NT 5 sets out he process for undertaking estate renewal which should follow the following steps:

- Engagement with residents across the site prior to the commencement of any proposals to inform them of what is being proposed, the process for how they will be engaged and the proposed timetable;
- The establishment of Residents Steering Group;
- An assessment of the potential for refurbishment;
- The establishment of the principles under which demolitions would be considered;
- The appointment of an Independent Advisor to help people through the process and to inform them of their right and options as tenants or leaseholders;

- The appointment of an architect to begin drawing up the site masterplan in consultation with the Residents Steering Group, including capacity testing, resulting in potential development options.
- The conducting of financial appraisals of the development options;
- Discussion with residents on the finds of the above studies, seeking agreement to the selection of a preferred proposal;
- Working up the preferred proposal for planning permission, including decant arrangements and the phasing of development;
- Appointment of a contractor to commence works.

Existing residential homes within the estate

8.26 The Mayor's Good Practice Guide to Estate Regeneration GPGER provides detailed guidance for assessing appropriate approaches to estate regeneration.

8.27 The applicant has provided figures confirming the existing homes to be demolished as part of the proposed redevelopment. This includes 297 residential homes, comprising 40 social rent tenure homes, 211 affordable rent tenure homes (temporary accommodation), 22 private owned homes (including right to buy leaseholders), together with a further 24 non-resident leaseholders.

8.28 The applicant is proposing 35% affordable housing provision by unit, this includes 500 social rent tenure units based on the illustrative scheme. This would increase the overall provision of low cost rent accommodation (both social rent homes and temporary accommodation) on the site by approximately 250 homes. This is strongly supported. Given that all LAR units would be replaced with secure social rent homes, the application would also provide a net increase of more than 460 secure social rent tenure homes. This is strongly supported. The proposed social rent provision within the illustrative scheme mix is set out below, showing the proposed net increase in units.

8.29 Based on these dwelling figures, it is evident that there would be an increase in social rented accommodation by floorspace and habitable room, in accordance with London Plan Policy H8.

Right to return

8.30 In terms of the right to return, the applicant's Landlord Offer on which the recent ballot was based confirmed that the right to return to the redeveloped High Road West neighbourhood would be offered to the 40 households on social rent tenancies and 211 households in non-secure temporary accommodation. To benefit from a right to return, households need to have lived on the estate since January 2021. This exceeds the minimum requirement set out in London Plan Policy H8 and the Mayor's GPGER and is

strongly supported. The phasing approach seeks to ensure residents only need to move *once through a 'single move' approach where possible, which is welcomed.*

Fair deal for leaseholders

8.31 The Mayor's GPGER seeks to ensure that leaseholders affected by estate regeneration are treated fairly and fully compensated. The Landlord Offer sets out the applicant's commitment to ensure fair compensation for resident leaseholders (market value, with an additional 10% compensation, plus all reasonable legal and moving costs paid). Resident leaseholders would also be offered an affordable home within the redeveloped neighbourhood via the offer of financial support in the form of an equity loan / shared equity homes. This approach is acceptable and accords with the key principles set out in the Mayor's GPGER.

Full and transparent consultation

8.32 The applicant has undertaken a ballot recently which was undertaken by an independent body, in line with the GPGER and GLA funding guidelines. Residents voted 56% "yes" in favour of the regeneration proposals, with a turnout rate of 69% of the eligible residents. This accords with the Mayor's Good Practice Guide to Estate Regeneration (GPGER). The Local Plan site allocation sets out a number of requirements relating to the engagement with existing residents through the establishment of a Residents Steering Group and discussion and feedback with this group in formulating the masterplan and in formulating phasing and decant options.

8.33 In its Statement of Community Involvement, the applicant has set out how it has addressed these engagement requirements leading up to the landlord offer, ballot and next steps. The applicant has established a Residents Charter and Design Guide in formulating the masterplan and detailed phase 1 element. This approach is expected to be used for all further estate regeneration phases. This consultation process has been underway for a number of years, leading up to the ballot. Overall, the approach accords with the key principles set out in the GPGER in terms of early engagement and feedback and the Site Allocation.

Consideration of alternatives

8.34 London Plan Policy H8 states that before considering demolition of existing estates, alternative options should be considered and the potential benefits associated with the option to demolish and rebuild an estate set against the wider social and environmental impacts. In this case, there is a detailed plan-led approach in place which sets out the rationale for the comprehensive redevelopment of the estate and establishes the principle of

demolition and redevelopment in order to optimise the regeneration and potential of the site. This is set out in the High Road West Masterplan (2014) and Tottenham Area Action Plan (2017).

8.35 The proposal includes the demolition of the Love Lane Estate and the provision of replacement of and an uplift in social rented and shared ownership homes within the masterplan area. The approach to leaseholders and public consultation accords with the Mayor's GPRGR. The GLA has not objected to the proposal on estate regeneration grounds, subject to the delivery of the maximum viable level of affordable housing. The proposal accords with London Plan Policy H8 and AAP Policy NT5.

Affordable Housing - Summary

8.36 Officers consider that both the amount and type of proposed affordable accommodation are acceptable (the Applicant is committed to delivering a minimum of 35% affordable housing by unit with a target of 40% provision by unit, subject to viability and grant funding),Early and Development Break Reviews will be secured through the S106 agreement. The quantum of affordable housing provision has been found acceptable via an independent review of the applicant's viability appraisal, subject to securing additional viability information at reserved matters stage and review mechanisms within the legal agreement. This, along with affordability levels of shared ownership housing will be secured by legal agreement. The proposal delivers like for like replacement of existing affordable housing and a net increase. The approach to leaseholders and public consultation complies with the Mayor's key principles on estate regeneration. The proposal accords with London Plan Policy H8 and AAP NT5.

9 **Development Design**

Policy Background

9.1 The recently published NPPF (July 2021) makes beauty and placemaking a strategic national policy, includes an expectation that new streets are tree-lined and places an emphasis on granting permission for well-designed development and for refusing it for poor quality schemes, especially where it fails to reflect local design policies and government guidance contained in the National Design Guide (January 2021) and, where relevant, National Model Design Code (July 2021).

9.2 London Plan Policy D4 encourages the use of masterplans and design codes and 3D virtual modelling and thorough scrutiny by officers and the design review process to help ensure high quality development (particularly, as in this case, the proposed residential component would exceed 350 units per hectare or include a tall building).

9.3 Local Plan Policy DM1 states that all development must achieve a high standard of design and contribute to the distinctive character and amenity of the local area. Further, developments should respect their surroundings by being sympathetic to the prevailing form, scale, materials and architectural detailing. Local Plan Policy SP11 states 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.

9.4 SP11 goes on to say applications for tall buildings will be assessed against the following criteria (summarised): adopted Area Action Plan (AAP) or masterplan framework, assessment supporting tall buildings in a Characterisation Study compliance with DM policies and all the relevant recommendations in the CABE / English Heritage "Guidance on Tall Buildings" 2007 (since superseded in 2015) and Historic England Advice Note on Tall Buildings. Local Plan Policy 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, 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 their area.

9.5 London Plan Policy D9 requires that tall buildings are only developed in locations that are identified as suitable in Development Plans. It goes on to set out a number of visual, functional and environmental impacts of tall buildings that should be considered in planning decisions.

9.6 The Upper Lee Valley Opportunity Area Planning Framework proposes that future tall buildings will generally be in well-defined clusters in identified urban growth centres. Strategic Policy SP11 requires all new development to 'enhance and enrich Haringey's built environment and create places and buildings of high quality'. Policy AAP6 states that, in line with DM6, Tottenham Hale and North Tottenham as growth areas have been identified as being potentially suitable for the delivery of tall buildings.

9.7 The HRWMF sets out the principle that tall buildings will only be considered in parts of the masterplan area where existing character would not be affected adversely by the scale, mass or bulk of a tall building. The HRWMF envisages a "legible tall building spine" that descends from Brook House to create an appropriate heritage setting for statutorily listed and locally listed assets.

9.8 The HRWMF also sets the principles that tall buildings should be located to minimise overshadowing of adjacent development and used as part of a way finding and movement strategy (for example located towards the end of east-west routes). Key views of the stadium should be considered and maintained in the profile of buildings.

Quality Review Panel Comments

9.9 Haringey's Quality Review Panel (QRP) has assessed the scheme at several stages in the schemes development including on the 27th of June 2018, 30th of January 2019, 28th of April 2021, 23rd of June 2021, 2nd March 2022 and 17 September 2021. The QRP reports are attached at **Appendices 7 – 12** of this Report.

The full QRP Report of the review will be attached in **Appendix 12** once published and responded to. Officer are satisfied that all point raised on17 September 2021 have been addressed.

Site Layout

9.10 This application is for the bulk of the High Road West Site Allocation, NT5 in the Tottenham Area Action Plan DPD (adopted July 2017) and fulfils all the site allocation requirements and guidelines. To accompany the Site Allocation, a more detailed High Road West Masterplan Framework (HRWMF) was prepared by Arup for the Council. The areas within the site allocation not part of this application are some of the properties fronting the High Road, generally those where no redevelopment of existing buildings is envisaged. Nevertheless, the masterplan within this application establishes clear principles for those properties. The proposals within this application also accommodate wholesale those other proposals that had received planning approval recently in the northern half of the site.

The HRWMF sets out the following relevant layout principles:

- Create a legible network of east-west streets that connect into the surrounding area, existing lanes off the High Road, pocket parks and other open spaces;
- Create attractive north-south links behind the High Road which connect public parks and squares, key public buildings and the station;
- Complement the scale of the proposed street layout with appropriate building heights;
- Establish clear building frontages along White Hart Lane with a high street type character integrating existing listed buildings;
- Incorporate a range of residential typologies including courtyard blocks of varying heights and terraced housing;
- Any tall buildings should be placed along the railway corridor to create a legible tall building spine. The buildings should use the existing Brook House (Rivers Apartments) as a reference point and descend in height;
- Demonstrate clear definition of fronts and back of buildings, public and private open spaces and active street frontages;
- Establish a simple palette of high-quality building materials for the Masterplan that includes significant use of brick; and
- Enhance the heritage value contribution of the High Road, reinforcing its fine grain and diversity of retail offer alongside improvements High Road frontages.

9.11 Figure 38 in the HRWMF sets out an overall indicative masterplan and also identifies the opportunity to create an east-west route across the site and the railway lines, between Brantwood Road in the east and Durban Road in the west.

9.12 The prosed scheme can be seen to comply with the following relevant HRWMF principles by:

- Providing an east-west street and north-south streets, broadly following the HRWMF alignment
- The proposed buildings step down in height from the railway line towards High Road
- Including a commercial and residential uses broadly in accordance with the indicative masterplan layout
- Providing tall buildings along the west of the site to create a spine of tall buildings alongside the railway (although these do not descend in height from the existing River Apartments building as envisaged – see discussion below)
- Establish guidance on a simple materials palette, including the significant use of brick
    - Providing a new public park (Peacock Park), new Civic Square (Moselle Square) and other public realm enhancements (Moselle Place, Orchard Mews, Breton Road, Whitehall Street)
- Providing a range of housing typologies with a mix of courtyard and other blocks with the tallest buildings located along the railway corridor;
- Buildings fronting onto public spaces and main roads, with the backs of the buildings and private spaces provided within courtyards;
- Providing defined public and private open spaces and active street frontages along the key routes;
- Safeguards a potential east-west bridge over the railway line, to the north of White Hart Lane
- Provides a north- south connection to Cannon Road to the north.

9.13 The proposed layout is based on a ‘streets and squares’ approach, with active ground floor frontages in the form of flexible commercial units, duplex/ maisonettes with front doors on the streets and communal residential entrances to a series of lower mansion blocks and tall buildings. The submitted design code sets out a range of guidelines to guide development of each of the development plots, this includes materials, detailed finishes, building heights and lower floor uses. The detailed design and layout of the buildings will be considered in future detailed reserved matters submissions which would still need to be considered by the Local Planning Authority in due course. Officers are satisfied that the quantum of development proposed can be accommodated within the site whilst providing a high quality development with active public realm. The Design Officer notes that the proposed streets and squarets would be extremely well integrated into surrounding existing

streets, especially to the High Road, and to the presence of the Tottenham Hotspurs Stadium.

9.14 However, the proposed layout would differ from the HRWMF's relevant principles and indicative masterplan in respect to the residential density of development proposed, the heights and massing of the blocks and the way in which they descend in height towards White Hart Lane and High Road and the amount of public open space and parking proposed. Officers consider that, on balance, these departures are necessary to make efficient use of the site by providing a residential density that would facilitate the delivery of the proposed affordable housing, public open space and other community infrastructure. It is considered that benefits, including but not limited to, the provision of a significant quantum of affordable housing, a substantial amount of public realm, new pedestrian and cycle links and new commercial floorspace outweighs the identified departures from the HRWMF principles.

Relationship with extant permissions

9.15 The illustrative master plan includes blocks/ development plots and parameters that would facilitate the delivery of the existing Goods Yard and Depot consents whilst not compromising the delivery of the wider master plan area.

Amount, location and type of Open Space

9.16 A development guideline in Site Allocation Policy NT5 and a key principle of the HRWMF is the production of a net increase in the amount and the quality of public open space. The HRWMF identifies broad building typologies to frame open space, and the Site Allocation calls for the creation of open space in addition to the creation of a legible network of east-west streets that connect into the surrounding area and the existing lanes off the High Road. The HRWMF proposes 39,400sqm of open space in total (including publicly accessible open space, children's play space, five-a-side playing pitch and allotments), compared to 21,000 sqm of open space in the NT5 site area currently (an increase of 80%).

9.17 Policy DM20, seeks to ensure that sites over 1ha in size which are located in identified areas of open space deficiency (as the majority of the site is), should create new publicly accessible open space on the site, in accordance with the open space standards set out in the Haringey Open Space and Biodiversity Study (2013), subject to viability. The Study calls for 1.64 hectares per 1000 people.

9.18 The submitted illustrative masterplan includes provision of a minimum of 33,300 sqm of open space, excluding the Public Park (Peacock Park) and Public Square (Moselle Square). The proposed park is a minimum of 5,300 sqm and public square 3,500 sqm. The site measures approximately 8.7 hectares, or 75% of the Site Allocation NT5 area (11.69ha).

The proposed provision of a minimum 41,800 sqm of open space is a significant uplift over the existing quantum of open space and commensurate with that envisaged in the HRWMF. The quantum of open space proposed is considered to be acceptable.

9.19 The ES (Chapter 14) and associate addendum reports on an assessment of the likely significant socio-economic effects of the proposed scheme, including on open space and play space. It considers open space as a whole (publicly accessible open space, communal residential amenity space and public realm) and finds that the proposed scheme would result in a Moderate to Major Beneficial effect at site level.

9.20 A s106 planning obligation can secure a Public Open Space Access and Management Plan (to be in accordance with the Mayor of London's adopted Public London Charter) (October 2021).

Public Realm, Landscaping and Boundary Treatments

9.21 London Plan Policies D1-D3 and D8 calls for high-quality public realm that takes account of environmental issues, including climate change, and provides convenient, welcoming and legible movement routes and stresses the importance of designing out crime by optimising the permeability of sites, maximising the provision of active frontages and minimising inactive frontages. Policies DM2 and DM3 reflect this approach at the local level.

9.22 The proposed Peacock Park would be shielded from road traffic and railway noise by proposed buildings. The applicant has clarified that the noise environment of this space should be below the upper "desirable" noise level recommended for open spaces in the relevant British Standard, which is good for an urban park. However, other open spaces near the railway and High Road would likely be noisier.

9.23 The applicant's Daylight and Sunlight Assessment finds that the proposed Peacock Park and 54% of Moselle Square would receive at least 2 hours of sunlight on the 21st of March. Although further detailed assessments will be required as the detailed reserved matters stage which would still need to be considered by the Local Planning Authority in due course.

9.24 The landscaping strategy for the proposed public realm is based on creating different character areas. The proposed spaces are envisaged to incorporate measures to calm traffic and include opportunities to play, sit and rest. They also include high-quality hard surfaces, trees and rain gardens to help provide shade, a net increase in biodiversity and sustainable drainage. These spaces would also incorporate lighting and other street furniture (including litter bins) to help ensure that spaces are safe and attractive. Officers consider that the proposed landscaping strategy would ensure attractive, uncluttered and inclusive public spaces are created. Full landscaping details will be considered at detailed reserved matters stage which would still need to be considered by the Local Planning Authority in due course. The extent of public realm works will be secured by legal agreement.

9.25 Public art provision within the public open spaces would be secured through the S106 agreement in accordance with Policy DM48.

9.26 The applicant intends that the proposed publicly accessible spaces (including the park) would be privately owned, managed and maintained. If permission was granted, it would be possible to use s106 planning obligation to secure the subsequent approval of an Open Space Management and Access Plan, to secure public access and appropriate management and maintenance arrangements.

THFC Matchday Crowdflow

9.27 It is envisaged that the proposed civic square (Moselle Square) will provide a direct pedestrian link between Tottenham Hotspur Stadium and White Hart Lane Station. The submission is accompanied by a Crowd Flow Study that reviews the masterplan for crowd safety and management on major event days at Tottenham Hotspur Stadium. The assessment is based on the submitted parameters and illustrative masterplan and includes data from several previous crowdflow studies for the stadium.

9.28 The Study has been reviewed by the Council's independent crowdflow expect who has found that further assessment needs to be undertaken to support the suggestion that both northbound platform and southbound platform queues can be accommodated within the proposed Moselle Square, and there are no significant safety concerns. The submitted parameters and illustrative masterplan can accommodate the spatial requirements required to successfully manage crowd flows on event days. The proposed indicative layout would improve the existing queue management, circulation and way finding on event days by improving legibility to the stadium, increasing areas available for queuing and reducing pinch points in the approach to the stadium. The detailed layout of the site and an interim crowd management strategy during construction will be secured at reserved matters stage along with an event management plan. This will include further crowd management studies. These will be secured by planning condition.

Building Scale, Form and Massing

9.29 London Plan Policy D9 (A) calls on development plans to define what is considered a tall building for specific localities, based on local context (although this should not be less than 6-storeys or 18 metres above ground to the floor level of the uppermost storey). The Local Plan (Strategic Policies 2013-2026) included a borough-wide definition of 'tall building' as being those which are substantially taller than their neighbours, have a significant impact on the skyline, or are of 10-storeys and over (or otherwise larger than the threshold sizes set for referral to the Mayor of London).

9.30 The strategic requirement of London Plan Policy D9 (Part B) is for a plan-led approach to be taken for the development of tall buildings by boroughs and makes clear that tall buildings should only be developed in locations that are identified in development plans. The Upper Lee Valley Opportunity Area Planning Framework proposes that future tall buildings will generally be in well-defined clusters in identified urban growth centres.

9.31 London Plan Policy D9 (Part C) sets out a comprehensive set of criteria for assessing the impacts of proposed tall buildings and these are discussed in detail below. Part D calls for free publicly-accessible areas to be incorporated into tall buildings where appropriate, but officers do not consider it appropriate for any of the residential towers proposed.

9.32 Strategic Policy SP11 requires all new development to enhance and enrich Haringey's built environment and create places and buildings of high quality. It makes clear that applications for tall buildings will be assessed against a number of criteria, including the following: an adopted Area Action Plan or masterplan framework for a site (i.e. the Tottenham AAP and the HRWMF in this case); assessment supporting tall buildings in a Characterisation Study; compliance with the Development Management Policies; and compliance with all relevant recommendations as set out in the CABE/English Heritage "Guidance on Tall Buildings" (2007 since superseded in 2015) and Historic England Advice Note on Tall Buildings.

9.33 Policy DM6 provides further criteria for the design of tall buildings, including to conserve and enhance the significance of heritage assets, their setting and the wider historic environment that would be sensitive to taller buildings. The policy also seeks to protect and preserve existing locally important and London-wide strategy views in accordance with Policy DM5. An urban design analysis is required to be submitted with applications for tall buildings assessing the proposal in relation to the surrounding context.

9.34 Policy AAP6 states that, in line with Policy DM6 (Figure 2.2), the North Tottenham Growth Area has been identified as being potentially suitable for the delivery of tall buildings.

9.35 The HRWMF massing principles seek to locate tall buildings towards the railway line, to create an edge to the development and build on the character established by the 22-storey River Apartments tower (81.5m Above Ordnance Datum (AOD)) at Cannon Road. Figure 52 of the HRWMF shows buildings reducing in height from this tower towards the High Road/White Hart Lane to create an appropriate heritage setting for statutory listed and locally listed buildings and Figure 53 sets out indicative proposed building heights. The building heights proposed by this application are set out in the table 13 below, alongside the approved heights in the extant consents and the indicative HRWMF heights.

Table 12: Proposed and consented building heights

Proposed		**Fall-back Position – Extant Consented Schemes**		
New Block	**Heights** ('full' details)	**New Block**	**Heights** ('Full' details & 'Outline' maximums)	**HRWMF Indicative heights**
North of White Hart Lane				
H-1a H-1b	18.175 to 30.975m AOD 1 to 4-storey	S1/D1/ D2	17.25/28.55/25.55m AOD Part 2/4/3 storeys	3-5-storeys
H-3	33.375 AOD Up to 5-storey	E1	31.5m AOD 5-storey	3-5-storeys
H-2	23.55m AOD Up to 2-storey	F1/F2	20.15/22.75m AOD 2-storey	3-5-storeys
J-1a J-1b	45.025 AOD 75.675 AOD 8-18 storey	C1/C2/C3/C4	75.5AOD/40 AOD/37AOD/34AOD Part 18/7/6/5	3-18-storeys
L-1a L-1b	57.9 AOD 84.5 AOD 12-21 Storey	B1/B2/B3	84.5/39.0/33AOD Part 21/7/3 storey	2 -18 Storeys
M-2	43.875 AOD 8 Storey	A1/A2	35.5-41.5 AOD Part 5/7 Storey	
M-1	108.05 AOD 29 Storeys	A2/B	22 to 43 AOD and 106m AOD Part 3/9/29 storeys	5-8-storeys 10-18-storeys
N1	46.175 AOD 10 Storey	C	19/37/43 AOD Part 1, 7 & 9-storeys	5-8-storeys
N2	36.25 AOD 7 Storey	D	29.65m to 32.70m AOD Part 5 to 6-storeys	5-8-storeys
N3-1 N3-2	30.4 AOD 36.55 AOD 4-6 storey	E	19/28/34m AOD Part 1, 4 & 6-storeys	5-8-storeys
N4-1 N4-2	27.1 AOD 37 AOD 4-8 storey	G	24.70m/27.36m/30.25m AOD Part 3/4/5 & 6-storeys	3-5 & 5-8-storeys
K1-1 K1-2 K1-3	27 – 38.050 4 – 7 Storey	-	24.07 – 37 AOD 3 – 7 Storeys	3-5 storeys
Other proposed plots north of White Hart Lane				
K2-1 K2-2	38.050 34.100	-	-	2-8 storeys

Proposed		**Fall-back Position – Extant Consented Schemes**		
New Block	**Heights** ('full' details)	**New Block**	**Heights** ('Full' details & 'Outline' maximums)	**HRWMF Indicative heights**
K2-3	27.200 3 - 7 storey			
L2	47.900 9 storey	-	-	5-8 storeys
J2	45.025 8 storey	-	-	5-8 storeys
M3	41.650 7 storey	-	-	5-8 storeys
I1-1 I1-2 I1-3	25.750 35.950 39.825 3-6 storey	-	-	3-5 storeys
I2-1 I2-2	29.000 23.900 2-4 storey	-	-	3-5 storeys
I3	29.475 4 storey	-	-	3-5 storeys
Plots south of White Hart Lane				
B-1 B-2 B-3 B-4	98.975 74.375 49.775 49.775 9 – 27 storey			3-8
C-1 C-2 C-3 C-4	58.325 47.400 42.950 41.250 7- 12 storeys	-	-	5-8
D-1 D-2	117.425 62.075 13- 29 storey	-	-	-
E	36.275 5 storeys	-	-	2-3
F-1 F-2 F-3 F-4	100.975 45.575 36.800 73.700	-	-	3-18

Proposed		**Fall-back Position – Extant Consented Schemes**		
New Block	**Heights** ('full' details)	**New Block**	**Heights** ('Full' details & 'Outline' maximums)	**HRWMF Indicative heights**
	5- 27 storey			
G	37.775 5 storey	-	-	3-5

9.36 The proposed scheme accords with the HRWMF principles of tall buildings being located next to the railway. However, the proposed tall buildings would be significantly taller than envisaged and would not reduce in height as much or as quickly towards White Hart Lane. Nevertheless, the proposed lower buildings are considered to generally accord with guidance in the HRWMF.

9.37 The Design Officer notes that the overall heights are increased, as housing targets and expectations of density have increased, active travel and public transport improvements have been delivered, particularly the new White Hart Lane Station and Cycle Superhighway 1, and other tall buildings in the vicinity have been approved, such as the six tall buildings to the south of the new stadium and THFC's other developments at the "Goods Yard" and "Depot" sites within this site, the designs of which, including their heights are adopted wholesale for the tall buildings proposed north of White Hart Lane.

Proposed Tall Buildings

9.38 Based on the London Plan definition the majority of buildings would constitute 'tall buildings.'

9.39 The application scheme proposes significantly taller buildings than those envisaged in the HRWMF but are consistent with the scale of consented buildings on the Goods Yard and Depot Sites. The tall buildings are sited on a north-south axis, adjacent to the railway line as set out in the HRWMF. The detailed design of the buildings will be governed by the parameters plans with respect to uses, footprints, siting and height. Their detailed design will also be governed by the design code submitted with the application and would be subject to further determination of detailed reserved matters from the Local Planning Authority

9.40 Given that London Plan Policy D9 is the most up-to-date development plan policy on tall buildings and includes the most comprehensive set of impact criteria, and covers nearly all the criteria covered in Haringey's own tall buildings policies, this has been used as the basis of an assessment. It incorporates most of the relevant criteria set out in Local Plan Policy DM6, although specific criteria from this policy are also addressed below.

9.41 Location - As stated above, there is clear and specific policy support for the principle of tall buildings in the Tottenham Growth Area, although the proposed heights are taller than the indicative heights in the HRWMF as noted under Building Scale, Form and Massing above.

9.42 The proposed tall buildings are aligned with the railway, as envisaged in the HRWMF. Buildings taller than envisaged in the HRWMF have been previously accepted on the northern part of the site. It is envisaged that the proposed tall buildings will be of exceptional quality design and facilitate the efficient use of the site. This includes providing a residential density capable of delivering the proposed affordable housing, public open space, new pedestrian and cycle links, new commercial and community floorspace. These benefits are considered to outweigh the identified conflict with the HRWMF principle, in the planning balance.

9.43 Visual impacts – Part C (1) of London Plan Policy D9 sets out the following relevant criteria that are addressed in turn.

> *(a) (i) long-range views – the top of proposed tall buildings should make a positive contribution to the existing and emerging skyline and not adversely affect local or strategic views.*
>
> *(a) (ii) mid-range views - the form and proportions of tall buildings should make a positive contribution to the local townscape in terms of legibility, proportions and materiality.*

9.44 Officers consider that the scheme would meet these criteria (see more detailed discussion below in terms of local and strategic views).

> *(a) (iii) immediate views from the surrounding streets – the base of tall buildings should have a direct relationship with the street, maintaining the pedestrian scale, character and vitality of the street. Where the edges of the site are adjacent to buildings of significantly lower height or parks and other open spaces there should be an appropriate transition in scale between the tall building and its surrounding context to protect amenity or privacy.*

9.45 The application scheme has been subject to numerous pre-application discussions and design review panels and been developed to ensure that the parameters and design code facilitate buildings that will be well articulated, separated, have active frontages at street level (including primary entrances at street level) and not be overly dominant at ground level. Officers are satisfied that the tall buildings will relate well with the street and the lower buildings that they would spring from. The Design Officer notes they should be capable of being considered “Landmarks” by being elegant, well-proportioned and visually interesting when viewed from any direction. Aspects of the Design Code on tall buildings also provide

assurances that they must be high quality designs, regular form, slender, grounded, with a clear base, middle and top with double height entrances and pronounced features to mark their tops but this will be subject to Reserved Matters application(s).

(b) whether part of a group or stand-alone, tall buildings should reinforce the spatial hierarchy of the local and wider context and aid legibility and wayfinding.

9.46 The proposed towers form a spine of buildings along the western edge of the site (in general accordance with the HRWMF). The tall buildings align with east-west routes to and from the High Road and would assist wayfinding in the local and wider area, particularly in relation to White Hart Lane Station. The Design Officer notes they will be capable of being considered "Landmarks" by being wayfinders or markers within the masterplan, marking the station and closing vistas of the east-west streets, the main north-south street, marking the new development with its new park from the south, west and east, and marking White Hart Lane station from the north.

(c) architectural quality and materials should be of an exemplary standard to ensure that the appearance and architectural integrity of the building is maintained through its lifespan.

9.47 Whilst the tall buildings are located in part of the site that is in outline form, the outline design and access statement and design code details set out illustrative treatments and forms of these buildings whilst fixing some rules that will guide the future detailed reserved matters submissions which would be subject to further determination by the Local Planning Authority. Officers are satisfied that the design code could facilitate the delivery of exemplary tall buildings. An obligation to ensure the existing architects oversee the delivery of the detailed design will be secured through a S106 obligation. The Design Officer notes they should be elegant, well proportioned and visually interesting when viewed from any direction. Aspects of the Design Code on tall buildings also provide assurances that they must be high quality designs, regular form, slender, grounded, with a clear base, middle and top with double height entrances and pronounced features to mark their tops but this will be subject to Reserved Matters application(s).

(d) proposals should take account of, and avoid harm to, the significance of London's heritage assets and their settings. Proposals resulting in harm will require clear and convincing justification, demonstrating that alternatives have been explored and that there are clear public benefits that outweigh that harm.

9.48 By virtue of the scale of the buildings proposed, it is likely that the tall buildings will result in a degree of (less than substantial harm) to the setting and significance of nearby heritage assets. The degree of harm will be mitigated by the scale and appearance of intervening buildings and local enhancements to the public realm around these assets as well as the architectural expression of these buildings. In light of this, officers consider that the less than

substantial harm caused to nearby heritage assets will be outweighed by the public benefits that the scheme would provide.

(g) buildings should not cause adverse reflected glare.

9.49 Potential solar glare impacts are addressed under Impacts on Amenity of Adjoining Occupiers below and are considered to be acceptable.

(h) buildings should be designed to minimise light pollution from internal and external lighting.

9.50 Light Pollution was scoped out at the EIA Scoping stage. There are no proposals to externally illuminate the proposed tall buildings and officers do not consider that there would be any significant adverse effects from internal lighting for this site. External lighting details can be conditioned.

Functional impacts – Part C (2) of London Plan Policy D9 sets out the following relevant criteria that are addressed in turn:

- *(a) the internal and external design, including construction detailing, the building's materials and its emergency exit routes must ensure the safety of all occupants.*

Fire safety is addressed below and is considered acceptable subject for plot A and the strategy of the outline part of the site is considered to be acceptable. Compliance with the submitted strategy for plot A and a detailed strategy for the outline element will be secured by condition.

- *(b) buildings should be serviced, maintained and managed in a manner that will preserve their safety and quality, and not cause disturbance or inconvenience to surrounding public realm. Servicing, maintenance and building management arrangements should be considered at the start of the design process*.

9.51 The London Plan (supporting text 3.4.9 for Policy D4) stresses the importance of these issues for higher density developments, those with a density of 350 units per hectare or more. Vehicular servicing is discussed under Transportation & Parking below. The proposed strategy for plot A is considered to be acceptable. The detailed arrangements for the outline part of the site will need to be secured by planning condition.

- (*c) entrances, access routes, and ground floor uses should be designed and placed to allow for peak time use and to ensure there is no unacceptable overcrowding or isolation in the surrounding areas*.

9.52 Given the tall buildings form part of the outline application, access arrangements to the building are not fully detailed in the submission. Officers are satisfied that indicative layout and design code would facilitate active frontages along key public routes and ensure that there

would be no overcrowding or isolation in the surrounding areas, including on Tottenham Hotspur match and other event days.

- *(d) it must be demonstrated that the capacity of the area and its transport network is capable of accommodating the quantum of development in terms of access to facilities, services, walking and cycling networks, and public transport for people living or working in the building*.

9.53 The capacity of the transport network is addressed under Transportation & Parking below. In summary, this is considered to be acceptable.

- *(e) jobs, services, facilities and economic activity that will be provided by the development and the regeneration potential this might provide should inform the design so it maximises the benefits these could bring to the area, and maximises the role of the development as a catalyst for further change in the area*.

9.54 The proposed ground floor commercial units and associated economic activity/job opportunities have been clustered around the proposed southern and northern squares and would have a satisfactory relationship with the proposed tall buildings and residential uses. These would make a positive contribution towards the regeneration of the area.

- *(f) buildings, including their construction, should not interfere with aviation, navigation or telecommunication, and should avoid a significant detrimental effect on solar energy generation on adjoining buildings*.

9.55 The site is not within an 'aerodrome safeguarding' zone and subject to the inclusion of aircraft warning lights (on construction cranes and completed buildings) required by regulations, the proposed tall buildings are considered acceptable. Proposed roof-top PV arrays are addressed under Energy, Climate Change & Sustainability below and are considered acceptable.

9.56 Environmental impacts – Part C (3) of London Plan Policy D9 sets out the following relevant criteria that are addressed in turn:

- *(a) wind, daylight, sunlight penetration and temperature conditions around the building(s) and neighbourhood must be carefully considered and not compromise comfort and the enjoyment of open spaces around the building*.

9.57 These issues are addressed under Residential Quality below. In summary, officers consider that the proposed towers could be designed to provide acceptable conditions for future residents and occupiers of neighbouring properties.

- *(b) air movement affected by the building(s) should support the effective dispersion of pollutants, but not adversely affect street-level conditions*.

9.58 Potential air quality impacts are addressed under Air Quality below and are considered to be acceptable.

- *(c) noise created by air movements around the building(s), servicing machinery, or building uses, should not detract from the comfort and enjoyment of open spaces around the building*.

9.59 Potential noise and vibration impacts are addressed under Residential Quality and Neighbour Amenity below. Officers are satisfied that tall buildings can be accommodated whilst providing a comfortable street level environment.

9.60 Cumulative impacts – Part C (4) of London Plan Policy D9 requires the cumulative visual, functional and environmental impacts of proposed, consented and planned tall buildings in an area to be considered when assessing tall building proposals.

9.61 The Environmental Statement and associated addendum, including the Heritage, Townscape and Visual Impact Assessments look at the potential cumulative effects of a number of consented and proposed schemes, including the Northumberland Development Project (which permits a 40m high 'sky walk' a 22-storey hotel, a 51m high sports centre and residential blocks up to 36-storeys in height – 131m AOD).

9.62 As outlined above, London Plan Policy D9 identifies most of the relevant criteria in Local Plan Policy DM6. However, a number of specific Local Plan criteria are addressed below:

- *Policy DM6 requires proposals for tall buildings to have regard to the Council's Tall Buildings and Views SPD.*

9.63 The Council has not prepared such an SPD (the former Supplementary Planning Guidance 1c on Strategic Views was withdrawn in July 2014). The impact on strategic views is assessed below.

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

9.64 The proposed tall buildings would be in a line, adjacent to the rail line and would be spaced out and viewed in the context of intervening buildings within the site that vary in height and massing, in an area that has been identified as being suitable for tall buildings. Given this, officers do not consider that there would be a canyon-like arrangement. The appearance,

scale and layout of the buildings would be secured at detailed reserved matters stage which would be subject to further determination by the Local Planning Authority. The Design Officer notes that they will be sufficiently far apart though, at around 30m from each other, and are slender in width east-west, to avoid detrimental effects of proximity and in any case are a line of aligned, north-south proportioned towers; there would be no canyon effect as their short sides would be the ones facing each other.

- *Policy DM6 (D) (c) requires tall buildings to avoid coalescence between individual buildings.*

9.65 Given the proposed layout of the tall buildings, aligning on the north-south axis there could be coalescence between buildings when viewing the buildings from the north or south but this would be limited by available vantage points in these directions. Where overlapping does occur, officers consider that the proposed differing design approach to these building would reduce coalescence, and the places where a coalescence would be observed, are generally less sensitive, including very few parts of the busiest streets in the vicinity, The High Road / Fore Street, Northumberland Park or White Hart Lane (which would pass through a short bit of coalescence around the railway bridge, but not for the longer view from further west), or major parks and public spaces such as those around the stadium, Tottenham Cemetery, Bull Lane Playing Fields, Florence Hayes Rec, Tottenham marshes or the proposed Peacock Park (although there could be some coalescence in some views from Bruce Castle Park). The appearance, scale and layout of the buildings would be secured at detailed reserved matters stage which would be subject to further determination by the Local Planning Authority. The Design Officer's comments noted in the point above equally apply to this point.

- *Policy DM6 (D) (d) requires applications for tall buildings to demonstrate how they collectively contribute to the delivery of the vision and strategic objectives for the area*.

9.66 The proposal constitutes the comprehensive masterplan for the NT5 allocation minus a small proportion of the northern-most extent of the allocation which has been delivered independently. and some small plots occupied by existing buildings along and immediately behind the High Road. The proposal is considered to deliver on the vision and strategic objectives of the allocation and 2014 masterplan.

- *Policy DM6 (E) – requires the submission of a digital 3D model to assist assessment*.

9.67 This has been done and officers have used this to help them consider the proposals.

Townscape and Visual Effects

9.68 London Plan Policies D9 and HC4 make clear that development should not harm Strategic Views, with further detail provided in the Mayor's London View Management Framework (LVMF) SPG. At the local level, Policy DM5 designates local views and the criteria for development impacting local view corridors.

9.69 The Townscape and Visual Impact Assessment (TVIA) and associated addendum which forms part of the ES considers likely significant townscape and visual effects across a study area (1 km radius from the proposed tall buildings). This has also helped inform the assessment of likely significant effects on built heritage, which is addressed below. The TVIA draws on Accurate Visual Representations (AVRs) of the proposed scheme from 26 representative views in the surrounding area, including beyond the 1km study area, that were agreed with officers. The assessment also includes additional non-verified views that have been agreed with Officers.

9.70 The site does not fall within any Strategic Views identified in the Mayor's LVMF. It also does not fall directly within any Locally Significant Views as identified in Policy DM5, although it does fall in the background of Townscape View No. 28 (along Tottenham High Road from High Cross Monument to Bruce Grove Station). The stadium means that the proposed towers would not be visible from Linear and Townscape View No. 33b (To White Hart Lane Stadium). The HRWMF shows key views from the High Road looking westwards along new streets towards two landmark buildings on the western boundary (the now built Riverside Apartments at the end of Cannon Road and a tower, in the approximate location of proposed Blocks M and L).

9.71 The ES identifies nine Character Areas. These are: (1) High Road, (2) Relict Industrial, (3) Tottenham Hotspur Stadium, (4) Post-war and modern residential blocks, (5) Light industrial in environs of Brantwood Road, (6) Industrial and institutional (7), Tottenham Cemetery and Bruce Castle Park, (8) The Roundway and (9) wider residential development. The ES concludes that the likely effect of the completed development on character areas 1-6 and 8-9 would be beneficial (negligible beneficial- Major beneficial) whereas the effect on character area 7 would be minor adverse. Officers would note that the proposed towers would not, in all cases, have wholly beneficial effects. This is particularly the case where these Character Areas relate to Conservation Areas and other heritage assets, as discussed below. However, in many views from these areas the existing tall and taller buildings on and adjacent to the site (the existing Love Lane blocks and the recent Rivers Apartments) are already visible, and the significant public benefits arising from the development, including but not limited to, the provision of new housing (including affordable housing), public realm improvements, new public spaces, new access routes, new jobs and new community facilities, amounting to a vibrant new town centre, will outweigh the harm, in the planning balance.

9.72 The ES concludes that the permanent effect of the proposed scheme on 5/26 receptors (viewpoints) would be beneficial (neutral beneficial – moderate/Major beneficial), the impact on 16/26 receptors were deemed adverse (minor-moderate adverse) and the proposal was deemed to have no impact on 5/26 receptors.

9.73 Set out below in Table 14 is a summary of the findings of the ES and associated addendum – which summarises findings based on detailed narrative assessments for each of the assessed views.

Table 13: ES Summary of effects on Visual Receptors (verified views)

Visual Receptors- Verified views	**Likely effect operation**	**Likely effect cumulative**
View 1 – Alexandra Palace, oriented away from vista	Moderate/Major Beneficial	Moderate/Major Beneficial
View 8 – Sandpiper Close, Waltham Forest	Minor Beneficial	Minor Beneficial
View 12 – Greenwich Park, General Wolfe Statue	None	None
View 13 – Public footpath at Lordship Recreation Ground	Minor Adverse	Minor Adverse
View 14a – War Memorial Cemetery	Minor Adverse	Minor Adverse
View 14b – War Memorial Cemetery	Minor Adverse	Minor Adverse
View 15 - Bruce Castle Park, south of Kings Road, oriented north-east	Minor/Moderate Adverse	Minor/Moderate Adverse
View 16 - Bruce Castle Park, main pedestrian axis, oriented north-east	Minor/Moderate Adverse	Minor/Moderate Adverse
View 18 – Carbuncle Passage, Hartington Park entrance, oriented north-west	Minor Adverse	Minor Adverse
View 19 – High Road, north of junction with Bruce Grove	None	None
View 21 – High Road, oriented north, north of junction with Lordship Lane	Minor Adverse	Minor Adverse
View 22 – High Road, oriented north, opposite junction with Cedar Road	Minor Adverse	Minor Adverse
View 23 – High Road, oriented north, at junction with Bromley Road	Minor/Moderate Adverse	Minor/Moderate Adverse
View 27 – White Hart Lane Stadium from Bruce Castle	Minor/Moderate Adverse	Minor/Moderate Adverse
View 29 – Pymmes Brook, adjacent to Angel Edmonton Road, oriented south-west	Negligible beneficial	Negligible beneficial
View 30 – Northwest corner of Dysons Road and Middleham Road, oriented west	Nil	Nil

Visual Receptors- Verified views	Likely effect operation	Likely effect cumulative
View 31 – Northumberland Park, north of junction with Worcester Avenue	Negligible Adverse	Negligible Adverse
View 32 – High Road, opposite junction with White Hart Lane, oriented north-west	Moderate Adverse	Moderate Adverse
View 33 – Beaufoy Lane, west of junction with Tenderden Road, oriented north-east	Minor Adverse	Minor Adverse
View 34 – Queen Street, opposite junction with Academia Way, oriented east	Nil	Nil
View 35 – Shaftesbury Road, north-west of junction with Pretoria Road, oriented south	Negligible Beneficial	Nil
View 36 – Fore Street, at entrance to Florence Hayes recreation ground, oriented south-west	Negligible Beneficial	Negligible Beneficial
View 38 – Creighton Road, north side opposite junction with Beaufoy Road, oriented east	Moderate Adverse	Moderate Adverse
View 39 – South-east corner of junction between White Hart Lane and Love Lane	Minor/ Moderate Adverse	Minor/ Moderate Adverse
View 41 - White Hart Lane at Beaufoy Road (night-time)	Minor Adverse	Moderate Adverse
View 42 – Northumberland Park, south of junction with Bennetts Close	Negligible/ Neutral	Negligible/ Neutral

9.74 Officers generally agree with the assessment in the ES but the Conservation officer does not agree with the minor/ moderate adverse effect identified in the Environmental Statement for the following views

- View 15: Bruce Castle Park, South of Kings Road, Oriented North-East
- View 23: High Road, Oriented North, At Junction Wit H Bromley Road,
- View 32: High Road, Opposite Junction Wit H White Hart Lane, Oriented North-West
- View 39: South-East corner of junction between White Hart Lane and Love Lane
- View 41: High Road North of Brent Wood Road
- View 42: Northumberland Park, South of Junction Wit H Bennetts Close.

9.75 London Plan Policy D9 calls for tall buildings to make positive townscape and visual contributions when seen from long, mid and immediate views. The ES considers that the following views are long, mid (or medium) and immediate (or close):

- Long - Views 1, 8, 12, 13, 14a, 14b, 15, 16, 18, 19, 21, 22, 27, 29 and 30
- Medium/mid – Views 23, 33, 34, 36 and 31
- Close/Immediate – Views 32, 35, 38, 39, 41, 42

9.76 Long-distance views. London Plan Policy D9 calls for the top of proposed tall buildings to make a positive contribution to the existing and emerging skyline and not adversely affect local or strategic views.

9.77 Officers consider that the application scheme would read well in long-distance views and provide positive additions to the skyline.

9.78 Medium/Mid-range views. London Plan Policy DM9 calls for the form and proportions of tall buildings to make a positive contribution to the local townscape in terms of legibility, proportions and materiality.

9.79 Likewise, officers consider that the application scheme would read well in mid-range views, with the verified views in the TVIA demonstrating that the proposed proportions would be acceptable when seen from locations in the nearby residential streets and parks and residential streets and would assist orientation and legibility at ground level.

9.80 Close/Immediate views from the surrounding streets. London Plan Policy D9 calls for the base of tall buildings to have a direct relationship with the street and maintain the pedestrian scale, character and vitality of the street. Where the edges of the site are adjacent to buildings of significantly lower height or parks and other open spaces there should be an appropriate transition in scale between the tall building and its surrounding context to protect amenity or privacy.

9.81 The proposed towers, are to be surrounded by smaller scale elements with active frontages proposed at ground floor level. The outline design and access statement, the submitted parameters plans and design code provide a suitable framework to ensure that the buildings are well articulated and finished to a high quality and have a positive relationship with their immediate surroundings. The Design Officer notes the tall buildings would be embedded within podia and shoulder blocks of their constituent plots and into the street pattern, tying them into the wider grain and mitigating their scale, with the remainder of the plots formed by mansion block scaled blocks of four to ten storeys, yet with gaps providing glimpses and sun and daylight access into podium gardens.

9.82 An assessment of the likely effects of the proposed scheme on neighbour amenity is set out below.

9.83 A number of verified views of the proposed scheme are contained in **Appendix 1.** Overall, officers consider that the proposed scheme is generally in accordance with the HRWMF and that it would have an acceptable overall effect on the wider townscape and visual receptors, including strategic and local views.

The proposed lower buildings

9.84 As summarised in Table 13 above, the proposed lower buildings range in height between 2 and 29-storeys. To respect the setting of the heritage assets at the High Road and White Hart Lane frontages the blocks in the 'heritage interface' areas (shown in green in Figure 04 below) would be lower scale and distinct. The scale of development would increase fronting the proposed streets and squares within the site (shown in blue), stepping up incrementally from 3 to 4-storeys and up to 5 to 6-storeys - opening up to larger linear mansion blocks with similarities in form and articulation around the proposed Peacock Park and Moselle Square. All of these would provide contextual buildings for the proposed tall buildings (figure 6).

9.85 The Design Officer notes the applicants have prepared a detailed Design Code to control all aspects of the proposals more detailed than street and block pattern and maximum height, comprising site-wide coding and plot by plot coding, as well as coding for landscaping. Rules within the design code are all described as "must" where following that rule is mandatory, or "should" where there is some flexibility, but a strong expectation; unlike most design codes, there are no "may" codes, which strengthens the certainty that the code provides. Site wide codes include important guarantees of quality like active frontages, defining "Primary Frontages" to where blocks face main streets and spaces, including the High Road, White Hart Lane, Moselle Square, Peacock Park and the key streets connecting them together; these should have shop frontages or primary residential entrances, front doors and habitable room windows, should not have refuse stores and must not have plant room doors or car park entrances. Further codes define high quality design approaches to all the required relationships between buildings and streets, including for instance, detailed coding to ensure refuse storage is convenient yet discreet. A series of Architectural and Landscape Codes apply to different character areas of the site, including "Civic" around Moselle Square, "Parkside" around Peacock Park and "Heritage" along the High Road and White Hart Lane and immediately adjacent to significant heritage assets such as The Grange; for these the broad, site-wide materials codes get refined into more specifically appropriate palettes, with masonry, predominantly brick, being the main required building material finish. These codes also define whether balconies should be recessed (such as to

the square) or projecting (such as to the park) and that balcony balustrades need to provide privacy and screening to residents' clutter.



Figure 06: The proposed lower buildings

9.86 The proposed parameters for Blocks H (1, 2 & 3), J (1 & 2), L (1 & 2) and M(2) are commensurate, albeit slightly larger, than that approved as part of the Goods Yard consent. The proposed parameters for blocks M (1), N (1, 2, 3) and N4 are all consistent with that previously approved under the Depot consent. Block K (1-1, 1-2 &1-3) are similar to that in the Print Works application which has a resolution to grant (subject to legal agreement) from the Planning Sub Committee.

Detailed element:

9.87 Block A1 – a 5 storey L shaped building located to the south of the Headcorn and Tenterden Shared Garden. The building is to be finished in a red/ red multi brick with a mix

of mortar colours and feature brickwork, with a regular fenestration pattern and arch and sill detailing. Windows and doors are to be composite, set in reveals. Corner articulation provided by projecting balconies within façade recesses. Entrances to the building area defined by contrasting feature brickwork. The building is to have a flat sedum roof with PV panels sat behind the parapet.

9.88 Block A2/A3 – a part 6 storey building stepping down to 5 storeys opposite the existing dwellings fronting Headcorn Road. The building is orientated on a north south axis, backing onto the railway and fronts new public realm (White Hall Mews). The building is to be finished in red/ red multi brick with mortar variations and feature brickwork, with articulation provided by a regular fenestration pattern, projecting circulatory cores and balconies. Windows and doors are to be composite, set in reveals, with arch and/or sill detailing. The building is to have a flat sedum roof with PV panels sat behind the parapet.

9.89 The Design Officer notes that these two blocks are modest but elegantly designed, and form an appropriate transition between the high-density, high-rise urban density and intensity of the rest of High Road West (& indeed other developments beyond, particularly the Spurs Stadium) and the modest, sleepy character and lower rise, scattered layout existing housing to the west of the railway. Details are thoughtful and materials robust, durable, and attractive. The detailed scheme will only give a hint as to what the rest of the scheme, in outline, could be, but if it is a marker for what is to come, it is a promising marker.

Outline element:

9.90 Block B – located to the south-western corner of the site, adjacent to the rail line and Orchard Place. This block is to adopted a Residential South Architectural Approach. This is envisaged to comprise of a double heigh recessed entrance, regular fenestration and balcony patterns variations in heights of component parts of the block and a crown to the top of the building. Materials are envisaged to comprise of rendered feature elements to the ground floor and a mix of buff, red and multi bricks.

9.91 In detailed comments, the Design Officer notes that this is probably the most challenging plot in design terms, but that the Parameter Plans and Deign Code contain within it sufficient flexibility that it should be capable of accommodating good quality housing as part of the overall development, provided Reserved Matters proposals successfully address its relationships to neighbouring plots, existing neighbours outside the site and the railway, provide sufficient amenity space, playspace, day and sunlight

9.92 Block C – located to the south-western corner of the site, adjacent to Brereton Road and High Road. The proposed architectural approach varies across the block comprising the

aforementioned residential design approach to the Brereton Road frontage. The frontage facing High Road is to adopt a heritage approach. This comprises taking ques from the nearby heritage assets, including materiality, roof lines and detailing. This could include string courses, mansard forms, door arches, brick window recesses and modern but complimentary materials.

9.93 The Design Officer notes this plot should be capable of providing excellent residential quality suitable of a variety of residents including families and affordable housing tenants, along with business uses in the High Road frontage and yard space, and strong retail / food & beverage uses unto the square & east-west route.

9.94 Block D – located to the west of the site, to the south of White Hart Lane Station and to the north of the junction with Whitehall Street. The block is to adopt a civic architectural approach to the facades fronting the proposed Moselle Square and a feature building approach to the tallest component adjacent to the railway line.

9.95 The Civic architectural approach comprises podiums at lower floor levels with regular but graduated forms that provide containment to the public spaces. It is envisaged that the parts of the building will be finished in varied brick, with regular fenestration and materials variations that vary as you move up the levels to add interest and break up massing. This includes band detailing, inset balconies, complementary feature panelling, a crown top storey and a parapet. The part of the building that is to adopt the feature building approach is envisaged that building will land in the public space, outside the station and provide a terminal view to the key vista along Love Lane and serving as a landmark in the wider area. The building is envisaged to have a stepped form and a quality modern materials pallet.

9.96 The Design Officer comments that this is the “landmark” plot of the whole southern half of the development, this tower is proposed to have a unique “Feature Building” architectural approach and should be the tallest building in the development. The 2nd floor podium is sufficiently open, particularly to the south, but also with an attractive slot providing a glimpse / lookout to the station frontage to the north, to promise good quality private amenity space, including children’s play space, and day and sunlight.

9.97 Block E – located to the east of the site, to the south of the junction of Moselle Place and High Road. The building is proposed to adopt a feature approach. It is envisaged that the building will have two distinct elevation designs with the west elevation extending the verdant landscape of Moselle Square, at multiple levels. The east is envisaged to provide continuity with the street frontage of High Road whilst acting as a marker for the Station and Football Stadium. The ambition is that the final building design is delivered through design competition. This will be secured via legal agreement.

9.98 In detailed comments, the Design Officer notes this is the other “landmark”, and a particularly challenging design; a single-use building, with active frontage on all sides and no particular back, that must address the square yet hold the High Road frontage as part of the continuous historic high road, repairing the gap created by the stadium opposite, a monumental landmark building, against which, despite being smaller, this needs to architecturally compete! An open architectural competition is recommended to secure the exceptional design quality such a significant and tricky brief requires.

9.99 Block F – located centrally in the site, to the south of White Hart Lane, the east of the Station and to the west of William Street. The block is envisaged to adopt the aforementioned civic approach on its southern side and Residential South architectural approach to the north.

9.100 The Design Officer notes the proposals are generally pretty sound and logical from a design point of view. The block facing the square, with its civic character and two floors of active town centre-retail use promises to animate this most important side of the square, and the generous two storey high podium, with gaps providing glimpses in and out, its lower shoulder to the south-west permitting day and sunlight in, promises to support excellent residential accommodation for a range of residents. However, the impact directly onto White Hart Lane of the tallest building in Plot F, is somewhat challenging, so the flexibility in the Parameter Plans and Design code to allow the position of this tower on the eastern side of this plot will be an important part of securing a good design at Reserved Matters.

9.101 Block G – located centrally within the site, to the south of White Hart Lane, to the north of William Street and the west of High Road. The block is envisaged to adopt the heritage architectural approach.

9.102 In detailed comments, the Design Officer notes this modest plot has proved challenging, but the Design Code and Parameter Plans should allow an acceptable scheme providing high quality housing, an active frontage to White Hart Lane, an appropriately modest relationship to its Listed Building neighbour to its east, and an urban design response to the vista to its north and the street corner on its western edge.

9.103 Blocks H – located towards the western edge of the site, to the north of White Hart Lane. The buildings are to adopt a heritage architectural approach to provide a sensitive setting for the adjoining listed and locally listed buildings and are in accordance with the existing planning permission for this site.

9.104 Blocks I - located towards the eastern edge of the site, to the north of White Hart Lane and adjacent to properties fronting High Road. The buildings are to adopt a heritage architectural approach to provide a sensitive setting for the adjoining listed and locally listed buildings.

9.105 The northern part of the block is envisaged to adopt the Peacock Park design approach. The approach seeks to transition between the natural landscape of the park and the residential/ mixed use buildings beyond. The buildings are to adopt an informal domestic character with ground floor duplex homes and animated communal entrances, continuous open frontages, mixed brick finishes and mixed window and balcony placements to upper floors.

9.106 In detailed comments, the Design Officer notes that although these proposed blocks are modest, their contexts of significant heritage assets are sensitive and relationships to their street and yard frontages are complex, but that the Design Code for them is sufficiently strict that good proposals at Reserved Matters applications should be possible.

9.107 Block J – Located to the west of the site, to the north of White Hart Lane and adjacent to the rail line. The building is to adopt a residential north architectural approach that comprises a taller building in the north-western corner with lower 5-8 storey sections to shoulder the tallest part of the building. The building is envisaged to be finished in brick, with duplex apartments at ground and first floor level creating a rhythm of private entrances at street level and projecting balconies to upper levels and are in accordance with the existing planning permission for this site.

9.108 Block K1 – Located to the east of the site, to the north of no. 817 High Road but to the south of 831 High Road. The block could be delivered independently of the masterplan pursuant to the recent Print Works application that the Planning Sub Committee resolved to grant planning permission.

9.109 If it does come forward as part of this permission, it is envisaged that the block will adopt a mixed architectural approach to form an interface between the existing buildings on High Road and the new higher density neighbourhood beyond. It is envisaged that the component parts of the building would vary in width, height, materials finishes, fenestration patterns and roof forms whilst providing active frontages at ground level to enhance the setting of the Conservation Area.

9.110 Block K2 – Located to the east of the site, to the south of no 867 High Road and to the west of the existing buildings fronting High Road. The block is proposed to adopt the mixed architectural approach to provide a sympathetic setting to the conservation area and

mediate between High Road and the higher density development towards the west of the site. The Design Officer notes that the Design Code is definitive on the form of these blocks, whilst leaving potential for considerable adjustment as more is discovered about the site before a Reserved Matters application. In this way, the Design Code seems to be as clear and definitive as possible to preserved design quality for this site.

9.111 Block M – Located towards the north-west of the site, adjacent to the railway line and to the south of Cannon Road. The tallest part of the block may be brought forward independently. If delivered by the masterplan, it is envisaged that the building would adopt a marker design approach, creating a landmark along the railway and aiding wayfinding to the proposed new park. It is anticipated that the building will adopt a distinctive design and materials pallet and are in accordance with the existing planning permission for this site.. The southern-eastern part of the building is envisaged to adopt the Peacock Park design approach.

9.112 Block N1 – Located to the north -western corner of the site, immediately to the south of Cannon Road. The block is envisaged to adopt the feature building approach. The building may be delivered independent of the masterplan, as part of the extant depot consent, and are in accordance with the existing planning permission for this site..

9.113 Block N2 - Located to the north of the site, immediately to the south of Cannon Road. The building is envisaged to adopt the park-side design approach but may come forward independently of the masterplan, as part of the extant depot consent, and are in accordance with the existing planning permission for this site..

9.114 Block N3 - Located to the north-eastern corner of the site, immediately to the south of Cannon Road and to the west of High Road. Is envisaged to adopt the heritage design approach but may be delivered independent of the masterplan, as part of the extant depot consent , and are in accordance with the existing planning permission for this site..

9.115 Block N4 – Located towards the north-eastern corner of the site, to the west of High Road. It is envisaged that the building will adopt the heritage architectural approach , and are in accordance with the existing planning permission for this site..

9.116 Overall, officers are satisfied that both the proposed design approaches and design code will facilitate the creation a visually interesting, well thought through and high quality neighbourhood.

Inclusive Design

9.117 London Plan Policies GG1, D5 and D8 call for the highest standards of accessible and inclusive design, people focused spaces, barrier-free environment without undue effort, separation or special treatment.

9.118 The applicant's Design and Access Statement (DAS) explains how the proposed scheme will be designed to meet inclusive design principles and good practice. All external routes, footway widths, gradients and surfacing would respect the access needs of different people. The proposed landscaping and play spaces will be designed to be safe (as discussed above), child-friendly and provide sensory interest (changing colours and scent) at different times of the year – with no separation based on housing tenure. Building access, internal corridors and vertical access would meet Building Regulations. 10% of the proposed buildings will meet M4(3) standards and 90% will meet category M4 (2) standards. In the detailed part of the scheme, 8% will be M4 (3), in response to the specific housing needs of the residents moving from Love lane to the Whitehall Mews. This level of provision is considered to be acceptable.

9.119 As discussed under Transportation and Parking below, car parking provision would be focused on the needs of wheelchair users, decanted residents and others that may have a particular need to access a car and proposed cycle parking includes spaces for 'adaptive' and large bikes. Overall, officers are satisfied that he proposed scheme would be accessible and inclusive. The particular requirements in relation to wheelchair accessible housing are discussed under the Residential Quality section below.

Secured by Design

9.120 London Plan Policies D1-D3 and D8 stress the importance of designing out crime by optimising the permeability of sites, maximising the provision of active frontages and minimising inactive frontages.

9.121 The proposal will seek to provide active frontages at ground floor level in the form of flexible commercial units, duplex/ maisonettes with front doors on the streets and communal residential entrances. This should all help ensure a safe and secure development and an active public realm. The detailed design of the public realm, including proposed landscaping and lighting for Whitehall Mews, are also considered acceptable, as is the proposed strategies for the outline part of the proposal. The details for which will be secured at detailed reserved matters stage which would be subject to further determination by the Local Planning Authority.

9.122 The Designing Out Crime Officer (DOCO) raises no objection in principle, subject to conditions. If planning permission were to be granted, it would be possible to impose a

planning condition to require Secured by Design accreditation and ensure the DOCO's continued involvement in detailed design issues and to require the implementation of a Management and Maintenance Plan for the space.

Development Design – Summary

9.123 The NPPF (July 2021) makes beauty and placemaking a strategic policy and places an emphasis on granting permission for well-designed development and for refusing it for poor quality schemes, especially where it fails to reflect local design policies and government guidance contained in, amongst other things, the National Design Guide (January 2021). London Plan and Local Plan policies require high-quality design and the HRWMF provides local guidance on place-making and design for Site Allocation NT5.

9.124 Officers consider that the proposed scheme is a well thought through and contains appropriate, parameters and design instructions to create an elegant design response to a significant site. The proposed masterplan and layout represent an improvement on the existing adopted masterplan, with a clear, legible street network, large public park, public square and other public realm whilst making efficient use of the site. The proposed street layout promotes creation of safe, active, inclusive and legible streets within the proposed development that will connect well with the surrounding network. The parameters, design code and indicative proposals demonstrate that streets and public spaces will be lined with good quality, well-designed low, medium and high rise blocks, verdant landscaping and provide an appropriate transition from the retained existing buildings along the High Road and White Hart Lane, to the proposed taller blocks.

9.125 It is considered that the proposal conforms with London Plan Policy D9, Local Plan Policies SP11, AAP6 and DM6 and generally accords with the principles and delivers on the objectives set out in the HRWMF. Officers consider that, overall, the proposed mix of heights (including 3 - 29 storeys) is successfully justified in accordance with this policy and guidance. In particular, whilst the buildings are taller than the indicative heights in the HRWMF, the separation distances between the buildings, the way in which building heights transition across the site and controls and design guidance contained within the design code, development specification and the illustrative material provided with the application provide a sound base to deliver an interesting high quality development that would deliver numerous benefits to the local community and wider Borough. Views of the development show it would generally not be any more detrimental than the existing and previously approved tall buildings, and by completing the intended row of tall buildings along the railway edge, as envisaged in the previously approved masterplan.

9.126 Officers consider that the QRP's concerns have either been addressed or are capable of being addressed at detailed reserved matters stage which would be subject to further review by the QRP and determination by the Local Planning Authority.

9.127 The proposal is capable of providing a significant amount of high quality public and private open space. This includes a new public park (Peacock Park), a new civic square (Moselle Square), shared podium gardens, private balconies. The proposed layout, distribution of uses and design would provide an accessible, safe and secure environment for future residents and the general public. It is recommended that s106 planning obligations secure public access to the proposed publicly accessible spaces and ensure that management and maintenance of streets and publicly accessible spaces is in accordance with the Mayor of London's recently adopted Public London Charter (October 2021). It is also recommended that that matters of scale, layout, landscaping and appearance details are reserved by way of planning conditions.

10 **Residential Quality**

10.1 London Plan Policy D6 sets out housing quality, space, and amenity standards, with further detailed guidance and standards provided in the Mayor's Housing SPG. Strategic Policy SP2 and Policy DM12 reinforce this approach at the local level.

Accessible Housing

10.2 London Plan Policy D7 and Local Plan Policy SP2 require that all housing units are built with a minimum of 10% wheelchair accessible housing or be easily adaptable to be wheelchair accessible housing. London Plan Policy D5 requires safe and dignified emergency evacuation facilities, including suitably sized fire evacuation lifts.

10.3 The detailed part of the scheme proposes 8% of homes to meet M4 (3) standards (5/60 units). This is in response to a specific need of returning Love Lane residents. The shortfall in provision on the detailed part is to be met with an over provision in the outline part of the proposal. Overall, it is envisaged that the proposal will deliver 10% (M4(3) (wheelchair user dwellings) and 90% meeting M4 (2) (accessible and adaptable dwellings). The wheel chair accessible units are 2 bedroom and 3 bedroom units and are located in block A1 which is served by two lifts. It is envisaged that the development will deliver accessible housing across a range of unit sizes and types, including affordable units, duplexes and apartments of varying sizes.

10.4 Disabled vehicle parking, for the detailed element, is provided in the CPZ parking area on Whitehall Street. The proposed parking is 3 on street spaces which equates to 3% and can be increased, if required. The cycle store to the north of A3 contains a mix of bike racks and Sheffield Stands which provide for 5% ambulant disabled cycle parking. Proposed emergency evacuation provision is addressed under Fire Safety & Security below (and is

considered acceptable). A Car Parking Management Plan that prioritises and manages access to these proposed spaces will be secured by condition.

10.5 A minimum of 3% blue badge car parking will be delivered for each block with up to a further 7% blue badge car parking provision for each plot, with the first reserved matters application delivering 10% blue badge parking.

10.6 The approach to entrances, lobbies and common areas are designed to meet Approved Document M, Volume 1, Categories 2 and 3. It is also envisaged that directional signage, lighting, level thresholds at entrances, door and corridor widths, surface materials, detailing of lift cars and internal wares will facilitate inclusive movement throughout the development. These details will be secured at reserved matters stage.

Indoor and Outdoor Space Standards

10.7 All of the proposed homes are envisaged to meet or exceed the national described minimum space standards and floor to ceiling heights (2.5m) standards called for in London Plan Policy D6.

10.8 All flats would have access to amenity space in the form of private balconies/terraces and/or direct access to communal open space, in the form of ground floor courtyards, podium level gardens. The details of which will be secured at reserved matters stage, for the outline part of the site.

Unit aspect, outlook and privacy

10.9 Most of the proposed homes are envisaged to be dual aspect. The majority of single aspect dwellings would be east and west facing. The reserved matters will include daylight/sunlight and overheating assessment and analysis to ensure that a suitable living environment is provided for future occupants. Proposed blocks A1, A2 and A3 would be suitably separated from the existing buildings fronting Headcorn Road, Penhurst Road and Tenterden Road, as well as one another and primary windows and balconies have been sited on the proposed buildings, to avoid giving rise to adverse privacy impacts, whilst providing a reasonable outlook.

10.10 Whilst the detailed design of the outline element is subject to future reserved matters submissions, Officers are satisfied that the buildings within each of the proposed blocks will be designed to provide good quality outlook and privacy for both the future occupants and that of their immediate neighbours.

Daylight/Sunlight/overshadowing – Future Occupiers

10.11 The applicant's Daylight and Sunlight Report provides and assessment of the detailed element of the permission and an indicative assessment of two of the blocks in the outline permission (Blocks B & C).

10.12 The detailed nature of the detailed part of the application, with detailed proposed floor plans, allows Average Daylight Factor (ADF) to be used to consider daylight. The assessment found that 91% (232/254) of proposed habitable rooms tested would satisfy the relevant ADF figures for different room types. The assessment of sunlight used Average Potential Sunlight Hours (APSH). This found that 73% 44/60 of the main living rooms have at least 1 window orientated within 90 degrees of due south. The building layout has been designed to minimise the number of north facing units. Each unit is to have a balcony or private amenity space which will typically receive good levels of sunlight.

10.13 The applicant's assessment also tested likely Sun on Ground for the proposed communal garden between Plots A2 and A2/A3 and the private gardens to the duplex apartments in Plot A2/A3 against the BRE guidelines that spaces should receive 2 hours sun over at least 50% of the area on March 21. This found that 92% of the tested communal amenity areas would meet the BRE guidelines. In addition, 7/8 of the private gardens would receive at least 2 hours of direct sunlight to at least half of their area. All residents will have access to the communal garden.

10.14 Approximately 87% of the facades on Plot B and 81% of the facades on Plot C would receive in excess of 15% Vertical Sky Component (VSC) with only 0.30 and 0.01% of the respective facades receiving less than 5% VSC. Daylight is envisaged to be more restricted at lower floors (4^{th} floor and below).

10.15 Approximately 83% of the facades of Plot D and 93% of the facades to Plot F would receive at least 15% VSC with 1.11% and 0.01% of the respective facades receiving less than 5%. Daylight is restricted at the lowest 3 floors of plot D (where it faces block B) and the lower floors on the eastern side, where the elevation is set in. I The design code ensures that habitable rooms are avoided in this area.

10.16 The VSC façade study, for plots H and I demonstrate that 91% of the façade would receive in excess of 15% VSC, with the remaining 10% receiving between 5% and 15% VSC. The areas achieving between 5 and 15% are located on the flank elevations facing plot F. It is envisaged that non-primary windows would be sited on this façade.

10.17 The VSC façade study, for plot J shows that 89% of the façades would achieve at least 15% VSC, with only 0.36% receiving less than 5% VSC. Careful consideration would need to be given to the courtyard and the north facing elevations. Daylight is most restricted on the flank elevations, these should serve secondary windows/ non-habitable rooms.

10.18 Plot K comprises three buildings. The VSC façade studies demonstrate the vast majority of the façades will receive high levels of VSC, with 92% receiving at least 15% VSC. Daylight is restricted to the north and south elevations of building K2-1 but still exceeds 5% VSC.

10.19 The VSC facades for plot L, show that 78% of the façade areas will receive at least 15% VSC, with 21% receiving between 5% and 15% VSC. Lower levels of daylight are seen to the inward facing façades within the courtyards, and particularly to the façades directly opposite the towers.

10.20 87% of the façades to Plot M and 89% of the facades to Plot N would achieve at least 15% VSC. Daylight is restricted on the flank elevation of plot N, that faces Plot K where non-habitable and secondary windows should be sited as set out in the design code. The lower VSC levels front plot M is the lowest 3-4 stories that face Plot L.

10.21 An average of 67% of the facades of the outline blocks meet or exceed the BRE report guidelines for annual sunlight (this includes north facing elevations which face north). It is recommended that the number of living rooms meeting or exceeding the BRE guidance is maximised. The design code sets out requirements to maximise light provision to the proposed dwellings.

10.22 Moselle Square, Peacock Park and Communal Roof terraces of the indicative scheme have been tested for at least 2 sunlight hours on the 21st of March. 54% of Moselle Square and Peacock Park is envisaged to receive at least 2 hours of sunlight. All roof terraces are envisaged to receive at least 2 hours of sunlight on the 21st of March.

10.23 The majority of courtyards and amenity areas serving individual plots would also comply with the BRE Report numerical guidelines. Plots D, J, L and M are arranged with buildings on all sides which inevitably creates challenges ensuring that sunlight can reach the internal courtyard, particularly to the southern part. Whilst these courtyards would not strictly meet the BRE Report guidelines, possible redistribution of the building massing at detailed design stage should reduce shadowing and enable the landscape architect to design the amenity areas in a way which utilises the sunlight received and achieves a desirable outdoor space.

10.24 31 of the external amenity areas tested would exceed the BRE recommendations. It is recommended that play and seating areas are located in the areas with highest sunlight availability and footways/ throughfares are located in areas that receive less sunlight. The report suggests that reducing massing, including set backs to upper floors and recesses/ projections in elevations, siting duplex units on the lower floors, optimising room layouts by siting light sensitive rooms in areas of highest availability, increasing the amount of glazing in the most light limited areas, off-set balconies to maximise light to the rooms below, utilising light internal finishes and positioning amenity areas in areas of highest light availability. Many of these measures are incorporated into the submitted design code.

10.25 Officers are satisfied that the proposed buildings and associated amenity areas will be designed to maximise daylight and sunlight availability and provide a high quality living environment for future occupants.

Noise and vibration – Future Occupiers

10.26 The applicant's Noise Impact Assessment sets out that the primary noise sources affecting the site are the railway, vehicular noise (from High Road and White Hart Lane),Tottenham Hotspur match days and associated non-football related events. The report recommends that the design code incorporates acoustic design measures such as acoustic screening of noise sensitive spaces, the use of glazing with appropriate acoustic performance, and use of mechanical ventilation. It is envisaged that, with the mitigation, all blocks would provide an acceptable internal noise environment for the future occupiers. The report identifies a need for further assessment of blocks closest to the stadium (Plots C and E). It is also recommended that further assessment is required of the impact of the CO2 bottling facility at Langhedge Lane Industrial Estate. Appropriate mitigation and further survey work can be secured by planning condition.

10.27 In respect to the detailed element, balconies have been sited away from the railway line to reduce the influence of rail related noise on external amenity areas. Block A2/A3 has been sited to provide acoustic screening to Block 1, Mechanical Ventilation is proposed to minimise the need to open windows. Enhanced acoustic glazing is proposed to the facades facing the highest noise levels. A planning condition is proposed to secure the necessary noise mitigation.

10.28 In respect to public open space, the initial analysis suggests that the proposed garden for the detailed element, Peacock Park and Moselle Square would provide an appropriate noise environment, without the need for mitigation. Some areas of public realm closest to White Hart Lane, the railway line and High Road would provide a sub-optimal noise environment, however, these areas are envisaged to be designed to cater for transient users and therefore would be fit for purpose.

10.29 Given the outline nature of much of the site, the precise locations and orientations of private amenity spaces is unknown. It is recommended that private amenity areas are located on facades away from the noise sources. If that is not feasible, mitigation such as solid balustrades, recessed balconies winter gardens may be necessary as required by the design code.

10.30 The majority of the facades of Blocks A1, A2 and A3, that contain balconies, would achieve noise levels below 55 dB Aeq, 16 hour. Some of the balconies on the eastern façade of plot A1 (facing the rail line) could be exposed to noise levels of up to 64 dB Aeq 16 hour. It is considered that the provision of amenity space to these units outweighs the harm of the amenity space exceeding the recommended guidance.

10.31 It is predicated that the vibration levels for plots A1, A2 and A3 would be significantly below the relevant threshold in BS6472-2008 and therefore no vibration mitigation measures are deemed to be required.

10.32 It would be possible to control mechanical plant noise by way of a standard planning condition (to reflect the site-specific noise environment). It would also be possible to use planning conditions to secure adequate mitigation to prevent undue noise transmission between the proposed ground floor commercial units and the proposed homes above and to limit the hours of use of any café/restaurant to 07.00 to 23.00 (Monday to Saturday) and 08.00 to 23.00 (Sundays and Public Holidays).

Residential Quality – Summary

10.33 The number of proposed wheelchair accessible homes and quality of these homes would meet requirements. The proposed homes and associated private and communal open space would generally be high quality and officers are satisfied that future residents would enjoy an acceptable residential amenity in terms of outlook and privacy, daylight and sunlight, wind/microclimate, noise and vibration. In respect to overheating, a balance will need be struck between the desire/ ability of some residents to open their windows for thermal comfort reasons and the need to mitigate noise from significant nearby noise sources (notably the rail line). Officers are satisfied that suitable mitigation (enhanced mechanical ventilation) can be secured by condition for plot A and further assessment and suitable mitigation can be secured by condition for the outline part of the proposal.

11 **Social and Community Infrastructure**

Policy Background

11.1 The NPPF (Para. 57) makes clear that planning obligations must only be sought where they meet the tests of necessity, direct relatability and are fairly and reasonably related in scale and kind to the development. This is reflected in Community Infrastructure Levy (CIL) Regulation 122.

11.2 London Plan Policy S1 states adequate provision for social infrastructure is important in areas of major new development and regeneration. This policy is supported by a number of London Plan infrastructure related-policies concerning health, education and open space. London Plan Policy DF1 sets out an overview of delivering the Plan and the use of planning obligations.

11.3 Strategic Policy SP16 sets out Haringey's approach to ensuring a wide range of services and facilities to meet community needs are provided in the borough. Strategic Policy SP17

is clear that the infrastructure needed to make development work and support local communities is vital, particularly in the parts of the borough that will experience the most growth. This approach is reflected in the Tottenham AAP in Policies AAP1 and AAP11. DPD Policy DM48 notes that planning obligations are subject to viability and sets a list of areas where the Council may seek contributions. The Planning Obligations SPD provides further detail on the local approach to obligations and their relationship to CIL.

11.4 The Council expects developers to contribute to the reasonable costs of new infrastructure made necessary by their development proposals through the use of planning obligations addressing relevant adverse impacts and through CIL, which is required to be paid by law. The Council's Annual Infrastructure Funding Statement (December 2021) sets out what Strategic CIL can be used for (infrastructure list) and how it will be allocated (spending criteria).

Site Allocation NT5 Infrastructure Requirements and the HRWMF

11.5 The NT5 Site Allocation envisages large scale redevelopment giving rise to infrastructure obligations above those that may be required on smaller and less complex sites addressed. The overarching vision for the High Road West area is for a significant increase in the provision of community facilities and envisages that the local community will have the best possible access to services and infrastructure. Key to the AAP site delivery for NT5 is the creation of new leisure, sports and cultural uses that provide activity 7 days a week. The infrastructure requirements for the NT5 site are broadly identified in the NT5 Site Allocation, including:

- A new Learning Centre including library and community centre;
- Provision of a range of leisure uses that support 7 day a week activity and visitation; and
- Provision of a new and enhanced public open space, including a large new community park and high-quality public square along with a defined hierarchy of interconnected pedestrian routes.

11.6 Haringey's Infrastructure Delivery Plan (IDP) Update (2016) draws on the HRWMF and sets out an indicative list of infrastructure with associated costings to deliver the NT5 Site Allocation (amounting to £57.33m). The IDP Update notes these items and costs may be subject to change as feasibility studies continue to be developed. The North Tottenham Infrastructure list sets out the costed obligations into 7 areas that accord with the vision and principles of the HRWMF.

Proposed site-specific infrastructure provision

11.7 The ES (Chapter 14) and associated addendum reports on an assessment of the likely significant socio-economic effects of the proposed scheme, including on primary and secondary school places and primary health care. This finds that the proposed scheme would have a Negligible impact on all of these forms of infrastructure, taking account of planned future provision and CIL payments or S106 payments. This is also the finding when considering the likely significant effects of the proposed scheme and the cumulative schemes, this includes the provision of Brook House Primary School as part of the Cannon Road development at the northern-most part of the NT5 allocation.

11.8 Library, community space and highways/public realm. The need for and proposed provision of overall open space, public realm including improvements to footways around the site, library and publicly accessible open space is addressed under Development Design above. In summary, this finds that there would be a beneficial increase in open space/ public realm and community facility provision. To ensure that the future residents of the development have suitable access to good quality public open space whilst the proposed and facilities are being delivered, the applicant has offered a £50,000 financial contribution to the improvement of Bruce Castle Park

11.9 School Places. The proposed scheme is estimated to result in a maximum of 1,100 children under the age of 15. The Council's School Place Planning Lead notes that there should be sufficient primary and secondary school capacity. Strategic CIL contributions could be used to fund additional school places in the future, should this prove necessary. Given this, officers agree with the ES assessment that the proposed scheme would have a Negligible effect on school provision.

11.10 Child care. The Childcare Act 2006 places a duty on local authorities to make sure that there are enough childcare places within its locality. The council is currently updating its Childcare Sufficiency Assessment. However, the 2015 Assessment and the sufficiency score cards (2016) do not identify a need to create more childcare places for the Northumberland Park Ward. In any event, the proposed scheme includes flexible commercial space (Use Class E), some of which could be used to provide space for children nurseries should this situation change.

11.11 Primary healthcare. The proposed scheme is estimated to result in the need for 4.7 FTE additional GP's (based on 1,800 patients per GP). The outline part of the scheme provides for at least 800 square metres of floorspace that could be used for a new healthcare facility. A medical facility was also secured as part of the Northumberland Development Project (which includes the Tottenham Hotspur Stadium) permission. It is proposed that the on-site delivery of a medical centre, if the Tottenham Hotspur Stadium Facility does not go ahead will be secured by S106. The S106 agreement will ensure uninterrupted healthcare facility provision within the site and potential for further provision. The CCG has recommended that a financial contribution is also sought to mitigate the uplift in demand. This could be used to fit out the proposed health care facility. Officers agree with the ES assessment that the proposed scheme would have a Negligible effect on healthcare provision.

11.12 Sports provision. The HRWMF considered likely indoor sports halls, swimming pool and playing pitch requirements as part of considering 'open space' needs arising from the Site Allocation. It assumed that the proposed Community Centre would include provision for a five-a-side pitch and indoor sports facilities and that additional swimming pool capacity was not required. There are currently over 20 sports, leisure and/or community facilities located within 2 miles of the site. This includes Whitehall & Tenterden Community Centre, The Grange, the GRACE Centre and Coombes Croft Library, all of which are located within the Site of the Proposed development. The proposal would deliver at least 500 sqm of indoor sport, recreation and fitness floorspace (E (d)), a further 500 sqm of community space (F2(b) use class) and 500 square metres of library and/or learning space (F1 (d-e)). The financial contribution to Bruce Castle Park may also be used for improvement sports provision. The quantum of provision proposed is considered to be acceptable.

Proposed site-specific infrastructure provision - Summary

11.13 The proposed development delivers a substantial gain in open space and community space provision. The proposed commercial space could accommodate children nurseries should commercial child-care providers seek to satisfy a demand and additional need. No particular need for additional school places in the area has been identified but, in any event, should a need arise, these, together with additional health care and sports provision for the area could be part funded by strategic CIL.

12 **Child Play Space**

12.1 London Plan Policy S4 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 and Policy SP13 underlines the need to make provision for children's informal or formal play space. The Mayor's SPG indicates at least 10 sqm per child should be provided.

12.2 The ES (Chapter 14) and associated addendum reports on an assessment of the likely significant socio-economic effects of the proposed scheme, including open space and play space. It finds that the proposed scheme would have a Negligible - Moderate beneficial effect on play space at site level and a Negligible effect at all other spatial levels.

12.3 Using the GLA's Population Yield Calculator (v.3.2) (October 2019), the proposed scheme estimates an on-site child population of 1,100 under 15's and 1,420 under 18's generating a requirement of 14,193 sqm of play space of all types. The proposed development is envisaged to deliver 3,080 sqm of door step play, 1,820 sqm of local playable space in addition to 3,930 sqm of parks and garden space. There are 5 existing pay spaces providing 1.54 hectares of space within the GLA recommended accessibility standards from the application site. The ES concludes that the proposal would have a negligible impact on open space provision. The ES addendum considers an interim scenario

based on the partial delivery of the outline part of the scheme (the part of the outline site to the south of White Hart Lane). The ES addendum estimates that there would be 877 children (under 18) requiring varying forms of play, equating to a demand of 8,774 sqm of play space. The proposed illustrative scheme is envisaged to deliver 3,649 sqm of doorstep play and a 3,350 sqm public square (Moselle Square), in addition to podium gardens and roof terraces. The ES concludes that the interim scenario would have a negligible impact on play space. The applicant has offered a £50,000 financial contribution towards improvements to Bruce Castle Park which could be used to improve play facilities in the interim scenario. On balance, the proposed quantum of play space is considered to be acceptable. The details of the play spaces will be secured at reserved matters stage.

13 **Heritage Conservation**

13.1 Paragraph 196 of the revised NPPF sets out that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use

13.2 London Plan Policy HC1 is clear that development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail and places emphasis on integrating heritage considerations early on in the design process.

13.3 Policy SP12 of the Local Plan seeks to maintain the status and character of the borough's conservation areas. Policy DM6 continues this approach and requires proposals affecting conservation areas and statutory listed buildings, to preserve or enhance their historic qualities, recognise and respect their character and appearance and protect their special interest.

13.4 Policy AAP5 speaks to an approach to Heritage Conservation that delivers "well managed change", balancing continuity and the preservation of local distinctiveness and character, with the need for historic environments to be active living spaces, which can respond to the needs of local communities.

13.5 Policy NT5 requires consistency with the AAP's approach to the management of heritage assets. The High Road West Master Plan Framework's approach to managing change and transition in the historic environment seeks to retain a traditional scale of development as the built form moves from the High Road to inward to the Master Plan area.

13.6 The HRWMF promotes the adaptable reuse of heritage assets with appropriate future uses identifying how various individual buildings will be used, what works they will require including restoration and refurbishment works to adapt to the proposed use.

Legal Context

13.7 The Legal position on the impact of heritage assets is as follows. Section 72(1) of the Listed Buildings and Conservation Areas Act 1990 provides: “In the exercise, with respect to any buildings or other land in a conservation area, of any functions under or by virtue of any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.” Among the provisions referred to in subsection (2) are “the planning Acts”.

13.8 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.”

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

13.10 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.

13.11 The authority’s assessment of likely harm to the setting of a listed building or to a conservation area remains a matter for its own planning judgment but subject to giving such harm the appropriate level of weight and consideration. As the Court of Appeal emphasised in Barnwell, a finding of harm to the setting of a listed building or to a conservation area gives rise to a strong presumption against planning permission being granted.

13.12 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.

13.13 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.

Assessment of Significance

13.14 The Tottenham High Road Historic Corridor consists of a sequence of five conservation areas. The North Tottenham neighbourhood is at the northern end of the historic corridor; it is, therefore, a threshold or point of entry to the historic corridor as a whole. The whole North Tottenham Conservation Area is in a fragile condition and it is currently designated a “Conservation Area at Risk” by Historic England.

13.15 Part of the High Road frontage and all of the White Hart Lane frontage of the site are within the North Tottenham Conservation Area. However, in its current condition, the site neither contributes to the quality and character of the Conservation Area nor the special interest and significance of the heritage assets in the surrounding area, other than: the local listed Station Master’s House (52 White Hart Lane) Former Chapel and Pastor’s House (Chapel Lane), St Francis De Sales Church and School, 6A White Hart Lane, 743-759 High Road and the substation (Neighbouring Coombes Croft Library and 731 High Road), the Grade II Listed Buildings at Nos. The Grange (32 – 34 White Hart Lane), No. 7 White Hart Lane and La Royale (819-821 High Road) and the nearby mature London Plane trees,. The existing 22/23 storey tall Rivers Apartments tower located immediately to the north of the site and the new Tottenham Hotspur Stadium also forms part of this context.

13.16 The proposed scheme locates tall buildings close to the western edge of the site (away from the High Road). As such, they would be set back from the North Tottenham Conservation Area frontages. However, they would form part of the immediate surroundings of the designated and undesignated heritage assets included Sub Area A (northern part of the High Road between Brantwood Road and White Hart Lane), Sub Area B (White Hart Lane) and Sub Area C (Tottenham High Road Central) of North Tottenham Conservation Area. The Conservation Area Appraisal and Management Plan (2017) considers the collection of Georgian buildings, including the Grade II Listed Grange and locally listed Station Master’s House to be good examples of early railway buildings, which were key to the transportation developments in the area during the 19th Century. It is significant in that it has retained buildings representative of each period from Georgian through mid to late Victorian up to post war housing. The Grange and its two later flank wings are early to mid-19th century and form an impressive Georgian group but its setting is marred by the projecting blank end wall of the Victorian terrace on one side and the open yard entrance

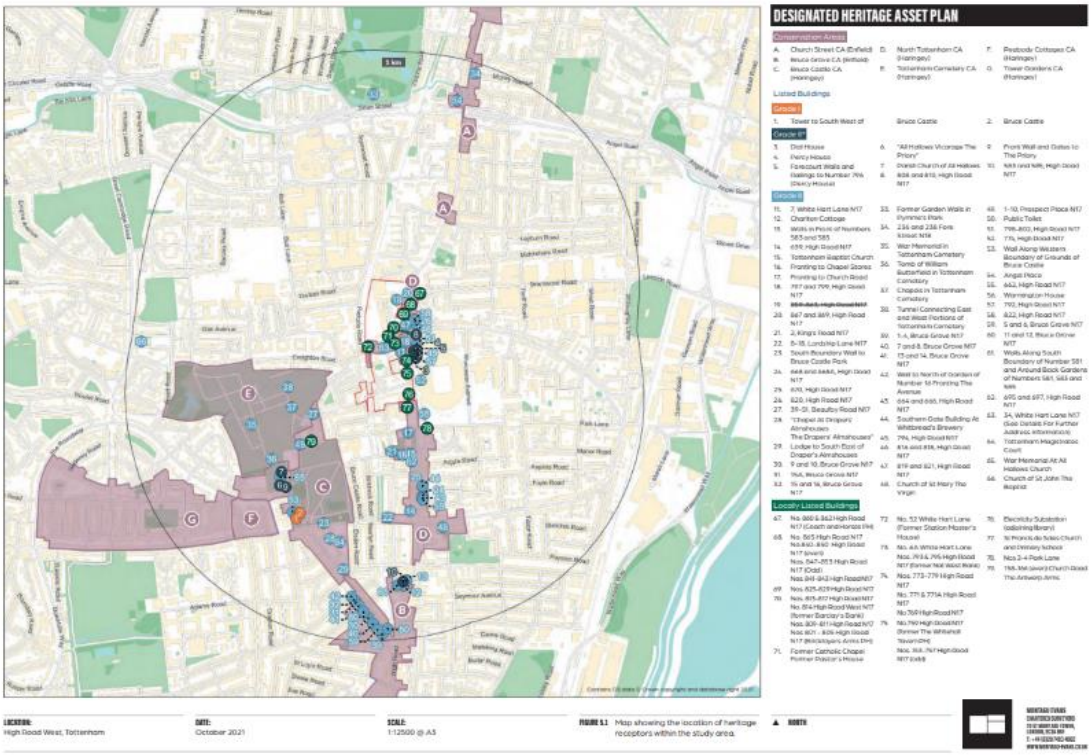
with security fencing. The Appraisal identifies the existing vehicular entrance area to the Goods Yard part of the site as a 'negative contributor' to the Conservation Area.

13.17 The built and visual context of the listed and locally listed buildings characterising the west side of the High Road has been progressively changing with the erection of some high-rise buildings such as the Rivers Apartment tower locate to the north of the conservation area and the erection of the Tottenham Hotspurs stadium. The NT5 allocation also expected to change the area in accordance with the HRWMF, which aims to transform the poor quality industrial and commercial sites into a mixed- use commercial and residential area complemented by high quality public spaces.

13.18 Volume 3 of the ES and associated appendices and addendum presents an assessment of the likely significant effects of the proposed scheme on built heritage. This comprises a Heritage and Townscape and Visual Impact Assessment (HTVIA).

13.19 The ES assessment started with the identification of built heritage assets within a 1km search area of the application site The 66 x Listed Buildings, 7 x Conservation Areas and 12 x non-designated heritage assets are identified in Figure 06 below.

Figure 07: ES Appendix 11.1 (Heritage Assets Plan)



13.20 The officer assessment below draws on the findings of the ES.

13.21 Nos. 797-799 High Road. The ES notes that these buildings are already experienced in the context of modern development, including Rivers Apartments, and that whilst the proposed towers would have a greater presence compared with this existing tower, they would, like the existing tower, be distant and separate from Nos. 797-799. The ES concludes that there would be a Minor Adverse effect.

13.22 Nos. 819-821 High Road (Listed Grade II). The ES notes that the building is already experienced in the context of taller buildings and that the proposed towers, which would visibly represent a new quarter beyond the High Road, would not materially change the way in which the listed pair is experienced. It concludes the proposed scheme would cause a Minor-Moderate adverse effect on these buildings.

13.23 Officers consider that the height and scale of the proposed towers would stand out in the background of heritage assets as prominent, contemporary structures in juxtaposition to the architectural and urban qualities of the Listed Buildings and also of the locally listed buildings at Nos. 823 to 829. As such, they consider that the proposed towers would cause 'less than substantial harm' to the setting and significance of these designated and non-designated assets.

13.24 No. 34 White Hart Lane (Listed Grade II). The nearest proposed plots to the building are the I plots. The ES concludes that the proposal would have a minor beneficial impact as a result of the demolition of nos 24-30 White Hart Lane and public realm improvements within its setting. Officers concur that the proposal would have a minor beneficial impact on the setting of this building.

13.25 No.7 White Hart Lane (Listed Grade II). The ES sets out that the setting of this building is formed by poor quality C19/C20 development. The proposed plot G is to the south west and the I plots opposite. The ES concludes that proposal will have a Minor adverse impact on this building. Officers concur and consider that the proposal will result in less than substantial harm to the building.

13.26 Nos.816, 818, 820 and 822 High Road (Listed Grade II). The ES notes that the setting of these buildings is urban and mixed with nearby historic buildings contributing positively to its setting with modern buildings to the north and south that detract from their setting. Proposed Blocks K, L and J will be behind the heritage assets. The ES concludes that proposal would have a Minor/Moderate Neutral effect on these buildings.

13.27 Due to the scale and proximity of the proposed buildings to the heritage assets, it is considered that the proposed buildings would result in less than substantial harm to the heritage assets

13.28 No. 808 – 810 High Road (Listed Grade II*). The ES sets out that the setting of these buildings is largely poor quality C20 buildings. The I plots are proposed to the rear of the

heritage assets. The ES concludes that the proposal will have a Minor Neutral effect on the heritage assets.

13.29 Officers consider that due the scale of the proposed I blocks the proposal would result in less than substantial harm to the heritage assets.

13.30 Nos. 867-869 High Road (Listed Grade II). Officers consider that the creation of a communal garden area would improve the immediate setting of the Listed Buildings.

13.31 In terms of the wider setting, the ES notes that the Listed Buildings are experienced in a townscape that already includes tall buildings, including Rivers Apartments to the west and Stellar House to the north east on the High Road as well as Tottenham Hotspurs new stadium. It finds that the visibility of the proposed additional towers in views from Brantwood Road and the High Road would not affect the significance or the ability to appreciate the significance of these Listed Buildings and identifies a Minor Negligible effect

13.32 Officers consider that the height and scale of the proposed towers would stand out in the background of heritage assets as prominent, contemporary structures in juxtaposition to the architectural and urban qualities of the Listed Buildings. As such, they consider that the proposed towers would cause 'less than substantial harm' to the setting and significance of these Listed Buildings.

13.33 North Tottenham Conservation Area. The site includes Nos. 867-869 High Road High Road, which forms part of Sub Area A of the Conservation Area and marks the entrance to the Conservation Area from the north. It also includes the adjoining surface level car park and mature London Plane trees (as well as other mature London Plane trees in the High Road footway) which fall outside of the Conservation Area). Officers consider that the proposed public realm enhancements together with the retention of the existing mature trees would enhance this part of the Conservation Area and have a positive effect.

13.34 The site includes the Station Master's House and adjoining frontage between it and the Grange that is identified as being a detractor from the Conservation Area. Officers consider that the proposed retention of the Station Master's House, the proposed new high-quality Block H and significantly improved access in to the site would enhance this part of the Conservation Area and have a positive effect.

13.35 However, whilst the proposed scheme would directly enhance parts of the High Road Conservation Area, due consideration needs to be given to the overall effects of the proposed scheme on the significance of this Area and other heritage assets. Whilst the proposed tall buildings would be set back and somewhat remote from the High Road and White Hart Lane frontages (and arguably signal the existence of another character area), they would be very tall and wide in east-west views. The ES concludes that the proposed tall buildings would have a Minor Adverse effect on the Conservation Area.

13.36 Proposed tall buildings along the western edge of the site would be in line with the vision established by the HRWMF. Officers consider that, the height and scale of the proposed towers would stand out in the background of heritage assets as prominent, contemporary structures and would cause ‘less than substantial harm’ to the setting and significance of the Conservation Area.

13.37 Bruce Castle and All Hallows Conservation Area. This has considerable historic and architectural significance and includes three important historic buildings – Bruce Castle (Listed Grade I), All Hallows Church (Listed Grade II*) and The Priory (Listed Grade II*). The ES finds that the Rivers Apartments tower is already seen from the park and that the proposed scheme would not bring about a particularly noticeable change to the perception of the urban setting of the park. The ES concludes that the proposals would have a Negligible Neutral effect.

13.38 Officers disagree with this part of the concluding assessment in the ES regarding impact. Officers consider that the proposed tall towers (in particular), would be prominent features when viewed from the open spaces in the Conservation Area, which is characterised by its openness, landscaping in the park and small-scale development in long views. As such, officers consider that these proposed tall buildings would cause ‘less than substantial harm’ to the setting and significance of this Conservation Area.

13.39 Station Master’s House (Locally Listed). The proposed scheme includes new buildings in close proximity to Station Master’s House. The ES concludes that the significance of the building and its appreciation would not be materially affected by the proposed tall buildings and identifies a Negligible effect.

13.40 Officers disagree with this part of the concluding assessment in the ES regarding impact and are of the opinion that the proposed towers would be significantly taller than envisaged, and therefore consider that the proposal would result in ‘less than substantial harm’ to the setting and significance of Station Master’s House.

13.41 Electricity Substation adjoining Library (Locally Listed). The ES states that the structure is in poor condition and that it is proposed for demolition. This is identified to have a Minor-Moderate adverse impact. Officers agree.

13.42 773-779 High Road, 771 and 771A High Street and 769 High Street (Locally Listed). The ES sets out that later additions have harmed the interest of the buildings. Plots G, E and F would form part of the setting of these buildings. Owing to the scale of the proposed buildings the proposal would result in less than substantial harm to the non-designated heritage assets. The ES con concludes a Minor Adverse impact.

13.43 743 – 759 High Road (Locally Listed). The ES notes that the former public house has been subject to alteration, is of limited interest and is proposed for demolition. Officers concur with the ES insofar as the proposal would result in a Minor-Moderate adverse impact

13.44 Former Catholic Chapel and Former Pastors House (Locally Listed). The ES states that the buildings are of limited heritage interest and will be retained. The buildings are currently abutted by functional warehouse buildings that detract from their setting. Plots I and K will be close to the buildings. The provision of a courtyard would provide some minor benefit to their setting.

13.45 No. 790 High Road (Dial House) (Grade II* listed) Forecourt Walls and Railings to number 796 (Grade II*), 798-802 High Road (Grade II), 794 High Road (Grade II), 792 High Road (grade II). The ES concludes that the proposal would have a Negligible Neutral effect. Officers disagree with the assessment in the ES and consider that the proposed towers, would be uncharacteristically tall when viewed from this Grade II & II* Listed Buildings and adversely affect their setting. As such, officers consider that these proposed tall buildings would cause 'less than substantial harm' to its setting and significance.

13.46 Tottenham Cemetery Conservation Area. The ES concludes that the proposal would have Minor to Moderate Adverse Officers agree with the assessment in the ES and consider that the proposed Towers would be excessively prominent features when viewed from the open spaces in the Conservation Area, which is characterised by its openness, landscaping in the park and small-scale development in long views. As such, officers consider that these proposed tall buildings would cause 'less than substantial harm' to the setting and significance of this Conservation Area.

13.47 Fore Street Angel and Fore Street South Conservation Areas (Enfield). The ES concludes that the settings of the Fore Street South/Angel Conservation Area in Enfield and views out of the Areas would not be affected by the proposed scheme since these are already characterised by large scale modern blocks of varying quality including Stellar House and the Rivers Apartments tower. The Inspector in the Goods Yard decision sets out that the Goods Yard towers would not bear any impact on this Conservation Area and its heritage assets and, the LPA identified no harm to this Area when granting permission for the extant Depot scheme. Officers agree with this conclusion, given their relationship with this area and existing tall buildings, the proposed development would therefore have no impact.

13.48 The ES notes potential impacts on a range of designated and non-designated heritage assets in addition to the most affected heritage assets listed above. Overall, it is considered that the proposed development would result in less than substantial harm in the mid- lower range. It is considered that the harm would be outweighed by the substantial public benefits, including but not limited to, providing new homes, new public realm, new pedestrian and cycle connections, a new public park and civic square.

13.49 Summary. Having carefully considered the proposals, including the findings in the applicant's ES, the Conservation Officer considers that the proposed towers would cause 'less than substantial harm' to the setting and significance of the above designated and non-

designated heritage assets considered together and that, having considered the specific impact of the proposed development on each relevant heritage asset, the prevailing level of harm would be at the mid- lower range of 'less than substantial':

13.50 As such, taking full account of the Council's statutory duty under sections 16 and 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990, paras 202 and 203 of the NPPF this harm has been given significant weight and requires a balancing exercise against public benefit.

13.51 The applicant's Planning and Regeneration Statements set out what the applicant considers to be the benefits of the proposed scheme. Taking account of this and their own assessment, officers summarise the public benefits as follows:

- The delivery of up to 2,929 new homes including 500 new council homes, approximately 400 new intermediate units
- Delivery of a new library and learning centre
- New public spaces and public realm, including new cycle routes and a route between Tottenham Hotspur Stadium and White Hart Lane Station
- Delivery of a high quality sustainable development
- New energy centre
- Bio-diversity enhancements
- Creation of approximately 1,214 new FTE jobs and a further 1,202 FTE jobs indirectly, per annum, during construction.
- The development of local supply chains
- A £143.1 million estimated contribution to the local economy during construction
- Creation of a minimum of 374 FTE jobs on site, once complete.
- A circa £23.2 million annual boost to the local economy through estimated residential expenditure per annum.

13.52 Having carefully considered issues, officers consider that the public benefits of the proposals, as summarised above, outweigh the less than substantial harm that would be caused to the designated and non-designated heritage assets.

Heritage Conclusion

13.53 Historic England makes no comment on the proposals but advises that the LPA should seek the views of its specialist conservation advisers. The Mayor of London (Stage 1 Report) considers that 'less than substantial harm' would be caused to the significance of heritage assets arising from the proposed height and massing of the scheme to all of the heritage assets assessed above.

13.54 Officers are bound to consider this strong presumption in line with the legal context set out above. The proposed scheme would provide some localised improvements to the settings of nearest heritage assets. However, officers consider that the proposed tall buildings would cause some 'less than substantial harm' to the setting and significance of a number of assets. This harm has been given significant weight and is considered to be outweighed by substantial public benefits including the provision of much needed housing, new community buildings, new public realm and affordable housing. Given this, officers conclude that, the proposals would have an acceptable impact on the character, appearance and special interest of the relevant heritage assets and comprise well managed change in accordance with Policies SP12, DM6, AAP5 and Site Allocation NT5 and guidance in the HRWMF.

14 **Impact on Amenity of Adjoining Occupiers**

14.1 London Plan Policy D6 notes that development proposals should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context, whilst avoiding overheating, minimising overshadowing and maximising the usability of outside amenity space. The Mayor's Housing SPG (2016) reinforces the need for privacy but cautions against adhering rigidly to minimum distance requirements and also calls for the BRE guidance on daylighting and sunlighting to be applied flexibly and sensitively to proposed higher density development, especially in town centres – taking account of local circumstances, the need to optimise housing capacity and the scope for the character and form of an area to change over time.

Daylight/Sunlight, overshadowing and solar glare Assessment - Methodology

14.2 The impacts of daylight provision to adjoining properties arising from proposed development is considered in the planning process using advisory Building Research Establishment (BRE) criteria. A key measure of the impacts is the Vertical Sky Component (VSC) test. In conjunction with the VSC tests, the BRE guidelines and British Standards indicate that the distribution of daylight should be assessed using the No Sky Line (NSL) test. This test separates those areas of a 'working plane' that can receive direct skylight and those that cannot.

14.3 If following construction of a new development, the no sky line moves so that the area of the existing room, which does receive direct skylight, is reduced to less than 0.8 times its former value, this will be noticeable to the occupants and more of the room will appear poorly lit.

14.4 The BRE Guidelines recommend that a room with 27% VSC will usually be adequately lit without any special measures, based on a low-density suburban model. This may not be appropriate for higher density, urban London locations. The NPPF advises that substantial

weight should be given to the use of ‘suitable brownfield land within settlements for homes…’and that LPAs should take ‘a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site’. Paragraph 2.3.47 of the Mayor’s Housing SPG supports this view as it acknowledges that natural light can be restricted in densely developed parts of the city.

14.5 The acceptable level of sunlight to adjoining properties is calculated using the Annual Probable Sunlight Hours (APSH) test. In terms of sunlight, the acceptability criteria are greater than 25% for the whole year or more than 5% between 21st September and 21st March.

14.6 The ES identifies the following definitions for the predicted impacts on receptors, which are used by a number of boroughs and which officers consider acceptable:

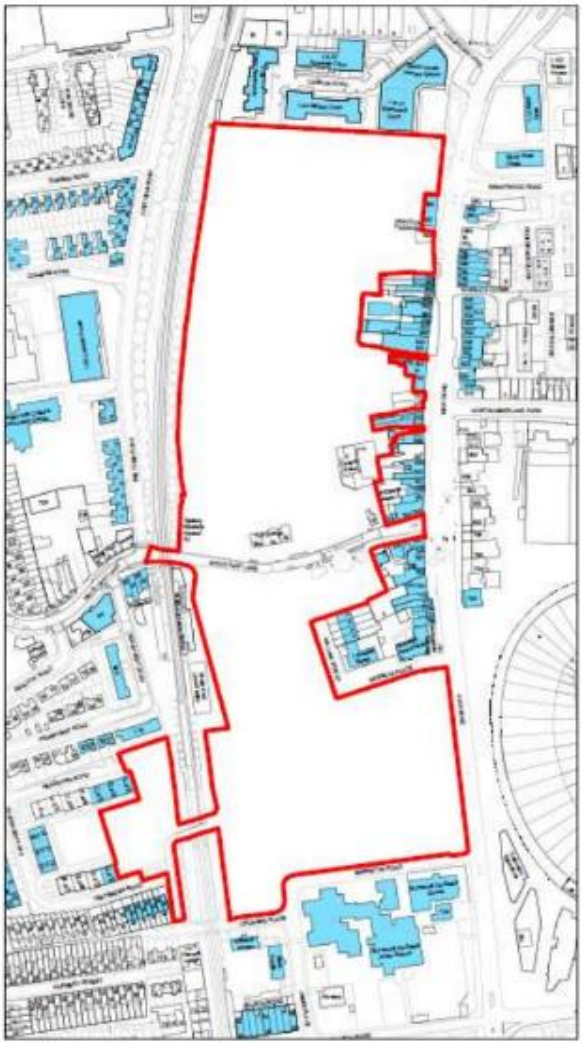
- Major (high) – less than 0.60 times former value (greater than 40% loss);
- Moderate (Medium) – 0.60-0.69 times former value (31% to 40% loss);
- Minor (Low) – 0.70-0.79 times former value (21% to 30% loss); and
- Negligible – Typically greater than or equal to 0.80 times former value.

14.7 A Sun Hours on Ground (SHOG) assessment considers if existing amenity spaces will receive the levels of sunlight as recommended within the BRE guidelines – which recommend that at least half of a space should receive at least two hours of sunlight on 21 March (Spring Equinox), or that the area that receives two hours of direct sunlight should not be reduced to less than 0.8 times its former value (i.e. there should be no more than a 20% reduction).

14.8 In terms of solar glare, separate BRE guidance sets out a method involving plotting the geometry of the proposed reflective facades relative to the receptor location onto a sunlight availability protractor and determining the times of day and year at which reflected sunlight could occur.

14.9 Chapter 9 of the ES reports on an assessment of the likely significant effects of the proposals on 31 neighbouring residential properties/ groups, immediately adjoining the application site. This includes 168 sensitive receptors in respect to daylight/ sunlight amenity, 89 sensitive receptors to overshadowing and 5 sensitive locations for solar glare. The assessment is based on two scenarios. A Maximum parameters (worst case) scenario whereby the development is built out to its fullest within the proposed parameters and an interim scenario which is the submitted indicative scheme.

Figure 6 Senstive Receptors for daylight and sunlight.



Sensitive receptors for overshadowing include:

Communal amenity area to Tenterden Road;
• Rear gardens to 1 to 23 Penshurst Road;
• Communal amenity area to 2-28 Penshurst Road;
• Rear gardens to 1 to 17 Pretoria Road;
• Communal amenity area to Lorenco House;
• Rear gardens to 34 to 45 Pretoria Road, 1 to 7 Durban Road and 6 to 8 College Road;
• Rear gardens to 46 to 67 Pretoria Road;
• Communal amenity areas and gardens to Rivers Apartments, Mallory Court and Beachcroft Court;
• Brook House Primary School Playgrounds;
• Communal amenity areas to Altair Close;
• Communal amenity area to 841 High Road; and
• Gardens to 2 to 8 William Street and 1 Moselle Street.

Daylighting and Sunlight Assessment

14.10 The assessment reported in the ES finds that, under the maximum parameters scenario, windows and rooms in 7 of the 45 buildings/ groups assessed would meet the VSC, NSL and APSH numerical guidelines set out in the BRE Guidelines. The assessment found that 13 of the 45 buildings groups assessed under the illustrative scheme scenario would meet the VSC, NSL and APSH numerical BRE Guidelines.

14.11 The situation for sunlight is similar, although in this case rooms in 56 of the 103 buildings assessed would meet the annual and winter APSH numerical guidelines.

14.12 Receptors (mainly homes, but including Brook House Primary School) in the remaining 46 buildings were found to be likely to experience a noticeable impact on daylight and/or sunlight. Table 17 below identifies these and sets out the likely significance of the adverse effect identified in the ES

Table 17: Daylight and Sunlight effects

Receptor	**Maximum Parameters**		**Illustrative scheme**	
	Daylight (Adverse)	**Sunlight (Adverse)**	**Daylight (Adverse)**	**Sunlight (Adverse)**
St Francis de Sales Church	Minor	-	Minor	
St Francis de Sales Junior School	Major	-	Moderate	-
St Francis de Sales Rectory	Minor	-	Minor	-
1-8 Williams House	Major	-	Major	-
1 – 12 Rees House	Minor	-	Minor	-
43 - 45 Tenterden Road	Minor	-		
46 - 50 Tenterden Road	Moderate	-	Minor	-
51-56 Tenterden Road	Minor	-	Minor	-
75 - 92 Tenterden Road	Moderate	-	Moderate	-
21 – 35 Tenterden Road	Moderate	Moderate	Moderate	Moderate
1 – 19 Penhurst Road	Major	Minor	Major	Minor

Receptor	Maximum Parameters		Illustrative scheme	
	Daylight (Adverse)	Sunlight (Adverse)	Daylight (Adverse)	Sunlight (Adverse)
2 – 28 Penhurst Road	Major	-	Minor	-
21 – 23 Penhurst Road	Minor	-	Minor No.21 only	-
25 – 27 Penhurst Road	-	-	-	-
57 – 63 White Hart Lane	Minor	-	Minor	-
65 White Hart Lane	Minor	-	-	-
1 – 11 Pretoria Road	Minor	-	Minor No. 2- 11 only	-
12 – 17 Pretoria Road	Moderate	Major No 15 only	Minor	-
Lerenco House	Major adverse	-	Moderate	-
2 – 8 Collage Road (evens)	Minor	-	-	-
1 – 4 Collage Park Road	Minor No.4 only	-	-	-
No.34, 35, 40 and 45 Pretoria Road	Minor	Major No.40 and 45 only	Minor No.40 and 45 only	Major No.40 and 45 only
No.36 – 39 and 41 – 44 Pretoria Road	Moderate	Major	Minor	Major
1-37 Durban Road Odds only	Minor No 1 and 17 only	-	-	-
46 – 49 and 53 - 67 Pretoria Road	Minor	Major No. 57 – 67 moderate only	Minor	Minor No 46 -48 & 58 – 67 only
50 – 52 Pretoria Road	Moderate	Major	Minor	-
Riverside Apartments	Minor – Moderate	Minor - Moderate	Minor	Negligible
Mallory Court	Major	Major	Major	Major
Ambrose Court	Moderate	Moderate	Moderate	Moderate
Beachcroft Court	Minor	-	Minor	-
Brook House	Minor	Minor	Minor	-

Receptor	Maximum Parameters		Illustrative scheme	
	Daylight (Adverse)	Sunlight (Adverse)	Daylight (Adverse)	Sunlight (Adverse)
867 – 869 High Road (odds)	Moderate	-	Moderate	-
840 – 850 High Road (evens)	Minor	-	-	-
831, 833, 841 and 849 – 853 High Road (odds)	Major	Minor 841 High Road Only	Major 841 & 849 – 853 Minor 831 and 833	-
835 – 843 and 845 High Road	Moderate 843 minor only	-	Moderate 835 & 837 Minor 839, 843 and 845	-
793 – 829 High Road (evens)	Minor 820 & 824 – 828 only	-	-	-
793 – 807 High Road (odds)	Minor	Moderate 797, 803 – 805 only	Minor 801 – 805 only	-
811A – 829 High Road (odds)	Major	Moderate 811A – 817 only	Major 811A Moderate 827 – 829 Minor 813 - 825	Minor 811A- 817 only
1-7 White Hart Lane	Minor 2-7 only	-	Minor 3-5 only	-
790 High Road	Minor	-	-	-
769 – 781 High Road (odds)	Major	Major 769 Moderate 771 and 777-781	Minor	Major 769 Moderate 777-781
783 – 791 High Road	Moderate 783 & 785 Minor 787 & 789	Moderate 785 – 789 only	Minor 789 only	Minor 785 - 789

Receptor	Maximum Parameters		Illustrative scheme	
	Daylight (Adverse)	Sunlight (Adverse)	Daylight (Adverse)	Sunlight (Adverse)
Bergen and Brooklyn Apartments	Major	Major	Major	Major
2 – 8 William Street (evens)	Major	Major	Major	Major
1 Moselle Place	Major	Major	Major	Major

14.13 Officers have scrutinised the detailed results of the assessment in the ES which take account of the use of existing rooms, balconies/self-shading and whether rooms are lit by more than one window. Residual VSC are reasonably good and appeal decisions for schemes in London have found that VSC values in the mid-teens are deemed acceptable. The vast majority of residential windows tested for daylight would be left with such levels and those that would be left with less would tend to experience only small absolute reductions. Overall, officers consider that, the levels of daylight and sunlight conditions would be acceptable – particularly as other residential amenity factors are also considered acceptable (see Overlooking/Privacy, Wind and Noise below).

Overshadowing Assessment

14.14 Chapter 9 of the ES reports on an assessment of the likely significant effects of overshadowing on surrounding main back gardens and amenity spaces. The ES also reports on an assessment of transient overshadowing of existing nearby gardens/amenity spaces for 21 March for the maximum parameters and illustrative scheme.

14.15 This BRE standard is met for 13 out of the 19 spaces. 6 of the 19 spaces tested would not meet the standard. The rear gardens of 1 – 19 Penhurst Road (4/10 gardens deemed to have a Major adverse effect) the rear gardens at Mallory Court (Major Adverse in the max parameters scenario and negligible in the illustrative scenario), the rear gardens of Beachcroft Court (Major Adverse), Brook House Primary School Playgrounds (Major Adverse on the western playground), the communal areas at no. 841 High Road (Major Adverse) and garden of 1 Moselle Street (Major Adverse for 3 of 4 gardens in the max parameters scenario and 1 of the 4 gardens in the illustrative scheme scenario). These results are largely due to configuration of the existing building within the site and close proximity of windows to existing and proposed built forms.

Glare

14.16 Chapter 9 of the ES reports on an assessment of the likely significant effects of solar glare from the detailed element of the proposed development. Owing to the outline nature of the remaining part of the proposal, insufficient information is available to determine the likely glare impacts from this part of the proposal. At this stage only plot assessed for its potential adverse impact on the railway line and associated signals is plot A. The impact is deemed to be negligible given the existing buildings and the introduction of the proposed development. The future detailed reserved matters applications will be accompanied by ES addendums to ensure that the proposal is acceptable in relation to glare, amongst other matters.

Overlooking/privacy

Detailed element

14.17 Block A1 would be located approximately 3.5 metres from the flank elevation of no. 51 – no. 56 Tenterden Road, approximately 16.5 metres from the rear elevation of 21 – 30 Headcorn Road and 17 metres from the principal elevation of Block A2. No. 51 – 56 Tenterden Road does not have any primary windows on its flank elevation. Block A1 would bring habitable windows in closer proximity to No.51 – 56 Tenterden Road however any views into the windows would be oblique and is not considered to result in unacceptable privacy or overlooking impacts. The separation distance between the proposed north facing windows and the south facing windows of no 21 – 39 Head corn Road are sufficient to avoid adverse privacy and overlooking impacts. Similarly, the separation distance between block A1 and A2 is considered sufficient to avoid unacceptable overlooking and privacy impacts arising between the habitable windows of the adjoining blocks and their private amenity areas.

14.18 Block A3 would be located approximately 8.5 metres from 31-35 Headcorn Road at its closest point. No. 31-35 Headcorn Road does not have any primary habitable windows on its east facing elevation (the elevation facing Block A3). The relationship between the windows and private balconies of the proposed block and those of No.31 – 35 are such that no adverse overlooking or privacy impacts would occur. The separation distance between block A3 and its existing neighbours would ensure that neighbouring privacy is preserved.

Outline element

14.19 Whilst the appearance of the proposed blocks in the outline element and their final layout is reserved for subsequent detailed approval by the Local Planning Authority, the parameters plans and design code govern what will be delivered as part of the reserved matters submissions.

14.20 Block B is proposed to be located between approximately 17.5 and 21.5 metres from the principal elevations of the nearest properties fronting Orchard Place, between 11 and 23 metres from the west facing elevation of Block C and between 12 and 24 metres from the south facing elevation of block D. The maximum and minimum separation distances proposed (as set out in the parameter plans) are considered adequate to ensure that neighbour amenity is suitably preserved.

14.21 Block C is to be located between approximately 17 and 20 metres from the north facing elevation of St Francis De Sales Junior School and 17 and 28 metres from the north facing elevation of St Francis De Sales Church. Block C is proposed to be at least 11 metres from Block D and 21 metres from block E. The proposed separation distances would ensure that neighbour and future occupant privacy is suitably preserved.

14.22 Block D is proposed to be sited between 37 and 40 metres to block A2 (on the opposite side of the rail line), at least 21 metres from Block F and 64 metres from Block E. The proposed separation distances would ensure that neighbour and future occupant privacy is suitably preserved.

14.23 Block E is proposed to be sited between 14 and 21 metres from its nearest existing residential neighbours on Moselle Place. These buildings have habitable windows and/or balconies in their south facing elevations. Block E is proposed for community uses. It is considered that the parameters would facilitate the delivery of a building that would not give rise to adverse privacy or overlooking impacts of these neighbours. However, careful consideration would need to be given to the placement of windows and balconies on the north elevation of block E, if the building comes forward at its minimum proximity to Bergan Apartments.

14.24 Block F is to be sited between approximately 13 – 16 metres from the shared boundary of the neighbouring buildings at William Street and between 74 and 77 metres from the east facing elevations of the nearest properties on Penhurst Road. Between 13 and 19 metres from the west facing elevation of Block G, between 26 and 30 metres from the nearest existing neighbouring buildings on White Hart Lane (at the closest point), between 40 and 45 metres from block H2 and between 47 and 50 metres from Station Masters House. Whilst Officers are satisfied that a building of the scale proposed could be accommodated on plot F, careful consideration will need to be given to siting balconies and primary habitable windows on the east facing elevation of the building, to ensure that neighbour privacy is suitably preserved.

14.25 Block G is located between 0 and 2.5 metres from the shared boundaries of the neighbouring buildings on William Street, White Hart Lane and High Road. Officers are satisfied that a building could be erected on the plot that preserves neighbour privacy, however, careful consideration will need to be given to the siting of primary windows and amenity spaces to the south and east facing elevation of the building.

14.26 Block H (H1, 2 & 3) is located between 2 and 15 metres of the shared boundary with of the nearest neighbour on White Hart Lane and between 0 and 5 metres from Station Masters House and immediately adjacent to Plot I1 and between 40 and 49 metres from the nearest existing properties on Pretoria Road (on the opposite side of the rail line) and between 7 and 14.5 metres from Block J. Whilst Officers are satisfied that the group of buildings could be designed to preserve neighbour and future occupant amenity. There are several close relationships between adjoining blocks that would need attention if habitable windows and private amenity spaces are proposed.

14.27 Block I (I1, I2 & I3) includes a block (I3) that immediately adjoins existing properties on High Road. Block I2 is located between 7 and 9 metres from the shared boundaries of the nearest properties on High Road. Blocks I2 and I3 are proposed to be located between 5 and 16 metres of one another, at their closest points. Block I1 is proposed to be at least 12 metres from block I2. Block I1 is proposed to immediately adjoin block H3 and is proposed to be between 7 and 15 metres of Block J and 11 – 27 metres to block K1. Whilst Officers are satisfied that buildings could be erected within the proposed parameters on the I plots, there are several close relationships with adjoining existing and proposed buildings that would need to be carefully designed to avoid adverse neighbour and future occupant privacy impacts.

14.28 Block J (J-1 and J-2) is proposed to be located between 47 and 55 metres from the principal elevation of the nearest existing properties on Pretoria Road (on the opposite side of the rail line), between 3 and 14 metres from Block L. The proposed separation distance to the neighbouring properties fronting Pretoria Road would be sufficient to preserve neighbour privacy. Careful consideration would need to be given to the siting of habitable windows and balconies on the north and south elevations of the buildings if the proposal was to come forward with the closest separation distances from the neighbouring blocks.

14.29 Block K (K1 and K2) are proposed immediately adjacent to the to the shared boundaries with several existing properties that front High Road. The blocks would be set between 4 and 11 metres of one another and between 23 and 42 metres from block L (at their closest points). Officers are satisfied that buildings could be accommodated within the plots, in line with the proposed parameters whilst preserving neighbour and future occupant privacy, the east facing elevations of the blocks (the elevation facing the immediate neighbours on High Road) and the north elevation of block K1 and the south facing elevation of block K2 and the north elevation of K2, would need to be designed to ensure neighbour and future occupant privacy is not adversely affected.

14.30 Block L (L-1 and L-2) is to be located between 61 and 72 metres from the nearest properties on Pretoria Road (at the closest point). The Block is proposed between 5 and 15 metres from Block M. The proposed separation distance from the properties fronting Pretoria Road is likely to be sufficient to preserve neighbour privacy. The north and south facing elevations of the block will need to be carefully designed to ensure that adverse privacy impacts do not arise between the adjoining blocks within the site.

14.31 Block M (M-1, M-2 & M-3) are to be located between 54 and 59 metres from the principal elevations of the properties fronting Pretoria Road and the flank elevation of the nearest property on Collage Road. The block is located between 8 and 18 metres from Block N1 at its closest point and between 16 and 23 metres from block N2 at its closest point and between 48 and 54 metres from Block N4. The proposed separation distance between the block and the properties fronting Pretoria Road and Collage Road would be sufficient to preserve neighbour privacy. Careful consideration would need to be given to the design of the north and south elevations of the block to ensure that suitable privacy is achieved for the future occupants of the block and that of the neighbouring blocks.

14.32 Block N (N1, N2, N3 and N4) – blocks N1 – N3 are located immediately adjacent to the shared boundaries with the flat blocks and school on Cannon Road and between 2 and 10 metres from the rear/ side elevations of the neighbouring buildings. Block N1 is proposed to be between 59 and 51.5 metres from the principal elevations of the properties fronting Pretoria Road. Block N4 is proposed to be at least 9.5 metres from the rear elevations of the nearest existing buildings on High Road. Block N1 and N2 are proposed to be 16 metres apart. Blocks N2 and N3 are proposed to be 13.5 metres apart and Block N3 and N4 is proposed to be 19 meters apart. Whilst Officers are satisfied that buildings can be delivered on the N plots, within the parameters proposed. The north facing elevations of blocks N1 – N3 and the east facing elevation of N4 will need to be designed to avoid giving rise to adverse privacy impacts. Similarly, consideration will need to be given to the east and west elevations of N2 to ensure that it does not have an adverse privacy impact on the neighbouring blocks. The extant permissions for this plot have demonstrated that an acceptable relationship can be provided.

Noise

14.33 The mixed commercial and residential nature of the scheme means that, subject to using planning conditions to limit hours of use of any commercial units and to control noise from mechanical plant, it should not cause undue disturbance to neighbouring residents. The applicant's Site Construction Management Plan also sets out minimum standards and procedures for managing and minimising noise during construction (which could be secured by planning condition).

Amenity Impacts – Summary

14.34 Amenity impacts must be considered in the overall planning balance, with any harm weighed against expected benefit. There would be some adverse impacts on amenity, as outlined above. However, officers consider that the level of amenity that would continue to

be enjoyed by neighbouring residents is acceptable, given the benefits that the proposed scheme would deliver.

15 **Transportation and Parking**

15.1 The NPPF (Para. 110) makes clear that in assessing applications, decision makers should ensure that appropriate opportunities to promote sustainable transport modes have been taken up and that the design of streets and other transport elements reflects national guidance (including the National Design Guide).

15.2 London Plan Policy T1 sets a strategic target of 80% of all trips in London to be by foot, cycle or public transport by 2041 and requires all development to make the most effective use of land. Policy T5 encourages cycling and sets out cycle parking standards and Policies T6 and T6.1 to T6.5 set out car parking standards.

15.3 Other key relevant London Plan policies include Policy T2 – which sets out a 'healthy streets' approach to new development and requires proposals to demonstrate how it will deliver improvements that support the 10 Healthy Street Indicators and Policy T7 – which makes clear that development should facilitate safe, clean and efficient deliveries and servicing and requires Construction Logistics Plans and Delivery and servicing Plans.

15.4 Policy SP7 states that the Council aims to tackle climate change, improve local place shaping and public realm, and environmental and transport quality and safety by promoting public transport, walking and cycling and seeking to locate major trip generating developments in locations with good access to public transport. This approach is continued in DM Policies DM31 and DM32.

15.5 DM Policy (2017) DM32 states that the Council will support proposals for new development with limited or no on-site parking where there are alternative and accessible means of transport available, public transport accessibility is at least 4 as defined in the Public Transport Accessibility Index, a Controlled Parking Zone (CPZ) exists or will be provided prior to the occupation of the development and parking is provided for disabled people; and parking is designated for occupiers of developments specified as car capped.

15.6 A key principle of the High Road West Master Plan Framework (HRWMF) is to create a legible network of east-west streets that connect into the surrounding area, existing lanes off the High Road pocket parks and other open spaces.

Transport Assessment

15.7 The majority of the site has a PTAL 4, with the north and south western corner having a lower PTAL of 3). The central, western and parts of the south western corner of the site

have a PTAL rating of 5. Cycleway 1 is located circa 400 metres to the south of the site. The site is also located in the Tottenham North CPZ. The application is supported by a Transport Assessment (TA) and a separate Delivery and Servicing Management Plan, Framework Travel Plan and Outline Construction Environmental Management Plan.

15.8 The TA submitted with the application is based on a scenario in excess of the maximum parameters proposed (1,933 private units, 1,044 affordable units and 36,000 sqm (GEA) of commercial floorspace in the B, E and F use classes).

Trip Generation

15.9 The applicant's TA estimates the likely trip generation for the main modes of transport based on applying trip rates derived from TRICS, based on a worst case scenario including all of the commercial space being delivered as Office Space. The expected worst case total development trips are set out in Table 20 below.

Table 20: Total trip generation by mode

Time Period	AM Peak (08:00-09:00)			PM Peak (17:00-18:00)			Daily		
	In	Out	Total	In	Out	Total	In	Out	Total
Underground/Overground	574	332	906	265	616	881	4,007	4,007	8,015
Train	9	43	52	27	16	43	168	168	336
Bus	588	396	983	294	633	926	4,407	4,407	8,815
Taxi	4	8	13	8	7	16	75	75	150
Motorcycle	-	-	-	-	-	-	-	-	-
Car driver	21	40	60	27	27	55	276	276	552
Car passenger	7	31	37	21	13	34	185	185	370
Cycle	70	43	113	34	75	110	502	502	1,003
On foot	234	522	757	347	319	666	3,639	3,639	7,277
Other	6	1	7	1	6	7	31	31	61
Total	**1,512**	**1,416**	**2,928**	**1,025**	**1,712**	**2,737**	**13,290**	**13,290**	**26,580**

15.10 The Transport Assessment concludes that the proposed development would result in a net increase of 2 vehicular movements on the AM peak and a net decrease of 79 vehicular movements in the PM peak. The proposed development is not envisaged to result in any adverse impacts on vehicular traffic, above the current situation.

Public transport capacity and protection

15.11 The proposed development would not have an unacceptable impact on London Overground line capacity with an estimated increase in utilisation rate from 28.1% to 28.6% of maximum capacity to Liverpool Street in the AM peak and 31.2% to 39.1% in the PM peak. The service to Cheshunt is estimated to increase from 73.2% to 78.8% in the AM peak and 53% to 54% in the PM peak. The service to Enfield Town is estimated to increase from 31.2% to 33.9% capacity and in the AM peak and 34.1% to 34.9% in the PM peak.

15.12 In respect to bus services, it is estimated that a total of 983 additional passengers will travel to and from the site in the AM peak (08:00 – 09:00) and 926 additional passengers will travel in the PM peak (17:00 – 18:00). The most affected service in the AM peak is envisaged to be the 341 south services towards White Hart Lane which would see an estimated 74 additional passengers in the AM peak (an additional 12.24 passengers per service). In the PM peak, the most affected service is envisaged to be 341 south service away from White Hart Lane with an estimated 79 additional passengers using the service (an additional 13.17 passengers per service). This level of intensification would not have a significant detrimental impact on the operations of the local bus network.

15.13 Whilst TfL has raised concerns with some of the assumptions underpinning the transport assessment, in particular, the number of proposed dwellings the model is based on, the selection of sites used from TRIC's and the bus trip generation figures, it is considered that the assumptions are reasonable and the outcomes would be reasonably similar, if adjusted. TfL are satisfied that the proposed development would not have an significant impact on the network.

15.14 Network Rail and the Mayor's Stage 1 Report raises the need for protection of the adjoining London Overground railway line. It is recommended that a planning condition requires protection works to be in place during the demolition/construction phase.

Site Access

15.15 Vehicular access is currently provided by High Road (A1010), located on the eastern boundary of the site and is the key north- south arterial route. White Hart Lane runs east – west linking the A1010 and A10 (Great Cambridge Road). There are a number of smaller residential streets and access roads within the site boundary. Notably Whitehall Street provides an East – West route connecting High Road to Tenterden Road. Love Lane connects Whitehall Street and White Hart Lane, on a north-south axis adjacent to the rail line and Moselle Street and William Street converge to connect High Road and White Hart Lane. The northern part of the site is less permeable to vehicular and pedestrian traffic. The detailed part of the scheme (plot A) is accessed via Whitehall Street, Tenterden Road and Headcorn Street.

15.16 Plot A will continue to be accessed via Whitehall Street and Tenterden Road and Headcorn Street with a new public route connecting Whitehall Street to Headcorn Road.

15.17 The primary access points for the outline part of the scheme will remain as existing, centred on High Road and White Hart Lane providing primary vehicular access. Given the outline nature of this part of the site, the detailed internal arrangements are reserved for subsequent approval. Notwithstanding this, it is envisaged that the proposal includes a new pedestrian route from White Hart Lane Station and Tottenham Hotspur Stadium and a new north-south cycle route connecting Cannon Road through to Brereton Road. New east-west vehicular route is proposed to the north-eastern corner of the site, connecting High Road to Cannon Road and a new one way connection to the south connecting Whitehall Street to Brereton Road. The proposal seeks to safeguard a potential pedestrian/ cycle route, over the rail line, to the north western corner of the site. The proposal also includes network of secondary/ restricted access vehicular routes and pedestrian routes within the site (figure 7 & 8).

Figure 7: Proposed illistrative pedestrian and cycle access strategy.



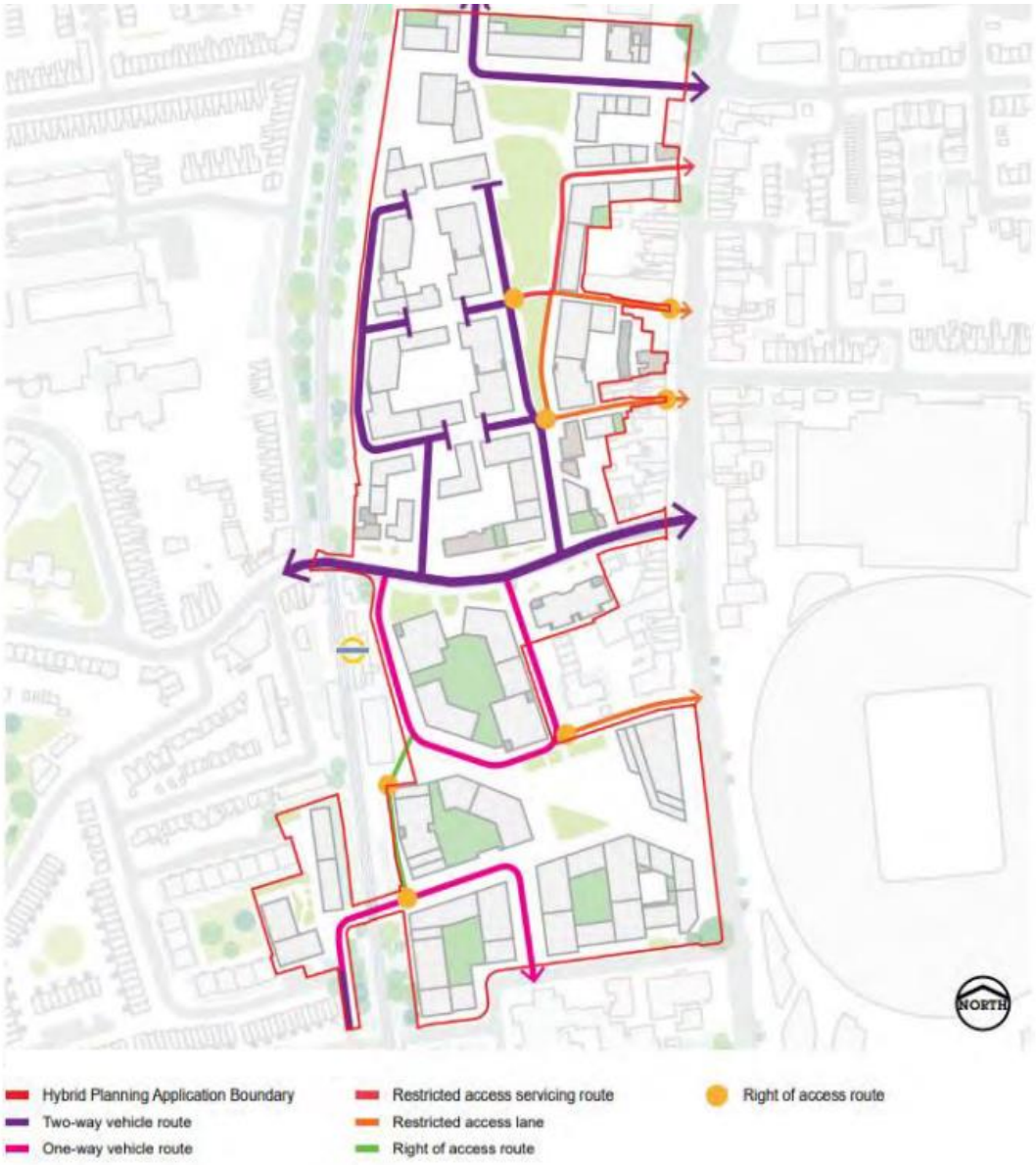


Figure 8: Proposed illustrative vehicular access strategy.

15.18 TfL calls for improvements to the route under the bridge along Whitehall Street and a Stage 1 Road Safety Audit of the proposed shared surface routes and any other areas where there is potential for conflict between vehicles and vulnerable road users. It is recommended that combined Stage 1 and 2 Audits are reserved by condition and improvements to Whitehall Street secured by S106 obligation.

Pedestrian and cycle movement

15.19 All the proposed routes across the site would be accessible for pedestrians and cyclists. The TA includes an Active Travel Zone (ATZ) assessment. This identifies a number of key destinations within a 20-minute cycle of the site – highlighting that the proposed schemes would be well connected to the public transport network as well as nearby leisure, educational, cultural and commercial activities. The ATZ finds that the proposed public realm improvements and increased permeability that the proposal would improve the site's connectivity with the surrounding existing walking and cycling routes as well as these public transport networks and activities.

15.20 Haringey Cycling Campaign have objected to the proposal on the grounds of indirect routing of the proposed cycle routes. They also highlighted the need for cycling facilities to be designed into the scheme. The proposed cycle routes are largely situated in the outline part of the site, whereby cycle facilities and landscaping arrangements will be detailed at reserved matters stage. The proposed cycle routes are envisaged to offer secondary cycle routes on quieter roads and not primary strategic routes in themselves. Officers are satisfied that the suitable planning conditions can be attached to the permission to secure satisfactory cycle links and associated facilities within the outline part of the site.

Car Parking

15.21 The detailed element of the scheme (plot A) does not propose any on- plot vehicle parking but would not by restricted from receiving permits for the CPZ. The plot is envisaged to be occupied by decanted residents from the Love Lane Estate. It is envisaged that the parking demand for the proposed units would be 26 vehicles. The CPZ is currently operating at 60% capacity, with 40 spaces available within 200 metres of plot A, which is considered sufficient to meet the forecasted demand. Two accessible parking bays are proposed on Whitehall Street, immediately to the south-east of the development.

15.22 Given the outline nature of the remaining part of the site, the parking requirements and distribution are not known at this stage. However, it is envisaged that the parking will be provided through a combination of on plot parking (basement/ parking courts/ podium parking) and street parking. The proposed parking arrangements are envisaged to come forward on a plot by plot basis at reserved matters stage. The illustrative masterplan provides car parking for 3% of new residents in the form of accessible parking, with space safeguarded to increase the accessible provision to 10% along with parking for decanted residents. It is envisaged that electric charging points will be provided in excess of the London Plan guidance. It is also envisaged that the proposal would deliver 10 car club spaces.

15.23 Management and mitigation. If planning permission were granted, it would be appropriate to secure the following by planning condition/s106 planning obligation:

Cycle Parking

15.24 For plot A, 113 long stay and 4 short stay cycle parking spaces are proposed. This is in accordance with London Plan Policy T5 and is acceptable. However, there is insufficient detail on the location and detailed provision of these spaces to ascertain that this meets guidance in the London Cycling Design Standards (including the need for at least 20% Sheffield stands and 5% wider spaces for non-standard bikes). It is recommended that a planning condition reserves approval of these details.

15.25 Owing to the outline nature of the remainder of the scheme, the detailed parking requirements and distribution are not known at this stage. The detailed cycle parking arrangements will be secured at reserved matters stage. It is envisaged that the proposal will provide cycle parking in accordance with the minimum requirements set out in London Plan Policy T5. It is likely that long stay cycle parking will be provided in the residential blocks either in podiums or designated cycle shelters. At least 5% of the long stay provision will be Sheffield stands with wider (1.8 metre access). Short stay spaces will be situated in visible and convenient locations in the public realm.

Travel Planning

15.26 The applicant's Residential Travel Plan and Framework Travel Plan sets out objectives of reducing the number of car trips made by residents, increasing the number of trips by walking and cycling and ensuring that development does not add pressure on the public transport system and sets out a strategy and process for setting and achieving specific targets. It is recommended that s106 planning obligations secure the implementation and monitoring of an approved Travel Plan

Delivery and Servicing

15.27 The applicant's Delivery and Servicing Plan estimates that there would be around 25 delivery and servicing trips in the AM Peak hour, 11 in the PM Peak hour. For the detailed part of the scheme (Plot A) loading is envisaged to take place on Whitehall Street and the bottom of Headcorn Road. For the outline part of the scheme, it is envisaged that loading and unloading bays will be distributed throughout the site and restricted access routes would be available for servicing and deliveries. It is recommended that a detailed plan, for the outline element, is secured by a planning condition and that s106 planning obligations ensure that Travel Plan Co-Ordinators are responsible for monitoring the Plan.

Construction Activities

15.28 The applicant's Outline Construction Environmental Management Plan (CEMP) takes account of the EIA cumulative schemes and sets out vehicular routeing and access principles and identifies strategies to reduce potential impacts. It is recommended that a planning condition secures the approval of a detailed CEMP as part of each reserved matters submission.

Transportation - Summary

15.29 The proposed scheme improves connectivity between the Cannon Road area and the High Road and White Hart Lane for vehicles, pedestrians and cyclists. The scheme would deliver a new north- south cycle link and a new public square that would provide a direct link from White Hart Lane Station and Tottenham Hotspur Stadium. Cycle and Car parking can be accommodated within the site and surrounding road network, in line with London Plan requirements. Notwithstanding the objection from Haringey Cycling Campaign, Officers are satisfied that suitable planning conditions can be attached to the permission to ensure that satisfactory cycle routes and associated facilities can be incorporated into the development. The scheme would result in a relatively small and manageable increase in vehicular trips, which subject to the recommended planning conditions and s106 planning obligations referred to above, would be manageable. An assessment of likely cumulative effects, including taking account of likely public transport trips associated with the development would be manageable. As noted above, the proposed development is capable of being delivered with beneficial impacts on crowd flows to Tottenham Hotspur Stadium on event days by providing a direct route to the station with adequate space for queuing. The independent review of the crowdflow assessment found that the proposed queue space would be adequate. The detailed arrangements, including temporary arrangements during construction and supplementary crowd flow assessment will be secured at reserved matter stage.

16 **Energy, Climate Change and Sustainability**

16.1 London Plan Policy SI2 sets out the Mayor of London's energy hierarchy: Use Less Energy (Be Lean); Supply Energy Efficiently (Be Clean); Use Renewable Energy (Be Green) and (Be Seen). It also sets a target for all development to achieve net zero carbon, by reducing CO2 emissions by a minimum of 35% on-site, of which at least 10% should be achieved through energy efficiency measures for residential development (or 15% for commercial development) and calls on boroughs to establish an offset fund (with justifying text referring to a £95/tonne cost of carbon). London Plan Policy SI2 requires developments referable to the Mayor of London to demonstrate actions undertaken to reduce life-cycle emissions.

16.2 London Plan Policy SI3 calls for major development in Heat Network Priority Areas to have a communal low-temperature heating system, with the heat source selected from a hierarchy of options (with connecting to a local existing or planned heat network at the top).

16.3 London Plan Policy SI4 calls for development to minimise overheating through careful design, layout, orientation, materials and incorporation of green infrastructure, designs must reduce overheating in line with the Cooling Hierarchy.

16.4 London Plan Policy SI5 calls for the use of planning conditions to minimise the use of mains water in line with the Operational Requirement of the Building Regulations (residential development) and achieve at least BREEAM 'Excellent' standard for 'Wat 01' water category or equivalent (commercial development).

16.5 London Plan Policy SI7 requires applications referable to the Mayor of London to submit a Circular Economy Statement demonstrating how it promotes a circular economy within the design and aim to be net zero waste.

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

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

16.8 Policy DM21 of the Development Management Document requires developments to demonstrate sustainable design, layout and construction techniques. The Sustainability section in the report sets out the proposed measures to improve the overall sustainability of the wider scheme, including transport, health and wellbeing, materials and waste, water consumption, flood risk and drainage, biodiversity, climate resilience, energy and CO2 emissions and landscape design.

Energy

16.9 The principal target is to for the development to achieve BREEAM communities "Excellent" Rating. The London Plan requires the 'lean', 'clean', 'green' and 'seen' stages of the Mayor of London's Energy Hierarchy to be followed to achieve a 'Zero Carbon' Standard targeting a minimum onsite reduction of 35%, with 10% domestic and 15% non-domestic carbon reductions to be met by energy efficiency. All surplus regulated CO2 emissions must be offset at a rate of £95 for every tonne of CO2 emitted per year over a minimum period of 30 years.

16.10 '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.

16.11 The proposed measures are envisaged to achieve a 10.12% reduction above Part L 2013 for Plot A (an annual carbon dioxide emissions saving of 7.27 tonnes per year). For the outline representing a 12% site wide saving (a saving of 561 tonnes of carbon dioxide per year above the relevant SAP factor baseline). The detailed energy saving measures for the outline part of the scheme will be secured at reserved matters stage.

16.12 'Be Clean.' The applicant is intending to connect directly to the Meridian Water District Heating Network. Connection to the proposed DEN is expected to save 2,365 tonnes of carbon dioxide per year (a 45% saving above the SAP 2012 carbon factor baseline) for the whole site and a 38.7 tonne saving for plot a (59.96% above 2013 Part L requirements). If connection to the DEN is not feasible, an Air Source Heat Pump district heating solution is proposed as a back-up. Temporary arrangements for plot A is to use a high efficiency low NOx boiler.

16.13 'Be Green.' Photovoltaic (PV) arrays are estimated to come forward on 50% of the available proposed roof space. The proposed PV panels are anticipated to save 2,138. tonnes of carbon dioxide per year (a 2% saving above the SAP 2012 factor baseline) site wide, including a 4.15 tonne saving for plot A (a 16.05% reduction in carbon emissions above current Part L requirements).

16.14 Plot A – 'Lean, 'Clean' and 'Green'. Table 21 below sets out the Plot A emissions savings.

	Annual Regulated CO_2 emissions reduction above 2013 Part L (tCO_2 / year)	**% saving**
Savings from 'Be Lean'	7.27	10.12%
Savings from 'Be Clean'	38.70	59.96%
Savings from 'Be Green'	4.15	16.05%
Total Cumulative On-siteSavings	50.12	**69.79%**

16.15 Overall – 'Lean', 'Clean' and 'Green'. Table 22 below set out the overall carbon emission savings.

Table 22: Site-wide regulated carbon dioxide emissions savings (based on SAP2010 emission factors)

	Total regulated emissions (Tonnes CO_2 / year)	CO_2 savings (Tonnes CO_2 / year)	Percentage savings (%)
Part L 2013 baseline	4,106	-	-
Be lean	3,582	523	13%
Be clean	1,741	1,842	45%
Be green	1,708	33	1%
Cumulative	-	2398	59%

17

17.1 'Be Seen.' An energy monitoring system is proposed and sub-metering/energy display devices in each home that would allow residents to monitor and reduce their energy use. It is recommended that a condition requires the development owner to submit monitoring results to the GLA (in accordance with the Mayor of London's draft guidance).

17.2 Carbon Offsetting. Despite the adoption of the 'Lean', 'Clean' and 'Green' measures outlined above, the expected carbon dioxide savings fall short of the zero-carbon policy target for proposed domestic and non-domestic uses. Overall, the amount of carbon to be offset (once connected to the proposed DEN) would be 21.7 tonnes per year for plot A. Based on 30-years of annual carbon dioxide emissions costed at £95 per tonne, this amounts to £39,060 (or £42,966 including a 10% management fee). It is recommended that s106 planning obligations secure this sum (including 10% monitoring fee), subject to any additional carbon savings that arise from more detailed design agreed with the LPA, by way of s106 planning obligations.

17.3 Whole Life-cycle Emissions. The applicant's Whole-life Carbon Assessment has been undertaken in accordance with the latest published GLA guidance (October 2020). This assessment accounts for the estimated whole life-cycle carbon emissions of the proposed development and outlines the actions taken to reduce life-cycle carbon emissions. The aim of the assessment is to provide guidance to minimise the Whole Life Carbon impacts of the proposed development by setting appropriate targets and recommending design interventions. A detailed assessment of Plot A is included in the appendices of the assessment.

17.4 The assessment finds that the total embodied carbon emissions (the carbon dioxide emissions associated with producing the materials used in the construction, maintenance and deconstruction of the development) for Modules A-C were 193,467,835 kgCO2e/m2. The highest contributing emission source is the residential use contributing around 91% of the total embodied emissions. It is recommended that a planning condition is imposed to secure a more detailed life-cycle emissions assessment at reserved matters stage

17.5 For plot A, the assessment finds that the total embodied carbon emissions for Modules A1 – A5 were 415 kgCO2e/m2 (below the 'standard' benchmarks) and were 218 kgCO2e/m2for Modules B-C (excluding B6 & B7) ('between the GLA's 'aspirational' and standard' benchmark).

Overheating

17.6 The applicant's Sustainability and Energy Statement includes overheating and cooling analysis that sets out that the development will be designed to minimise the need for energy intensive air conditioning systems. The assessment highlights that noise and air pollution will be a limiting factor to achieving natural ventilation for some parts of the site. A detailed assessment will need to accompany the future reserved matters submissions.

17.7 For plot A, the assessment concludes that the design has the ability to mitigate overheating if the windows can be fully opened to allow sufficient airflow. However, if windows cannot be opened (due to noise) the units will not pass TM59. Alternative measures are required for some units (peak lopping or enhanced mechanical ventilation). A detailed scheme for noise and overheating mitigation will be secured by condition.

17.8 Energy conclusion. The overall anticipated on-site carbon emission reductions over Building Regulations (2013) and associated offsetting payments would meet London Plan Policy SI2. The proposed connection to an off-site DEN would also meet London Plan Policy SI4. The expected building performance such at least 10% for domestic and 15% for non-domestic savings to come from building fabric can be achieved, in line with London Plan Policy SI2.

17.9 The proposed 'Green' savings would be below the 20% called for by Local Plan Strategic Policy SP4. However, officers are satisfied that the amount of proposed roof top PV arrays will be optimised while balanced against other demands for roof-top space.

Environmental sustainability

17.10 Circular Economy. The applicant's Circular Economy Statement identifies the following five key steering approaches to designing for the circular economy for plot A:

- Retain the value of existing materials through deconstruction to enable recovery and reuse (where feasible)
- Adopt lean design principles to minimise the material intensity of the development and reduce waste.
- Ensure adequate storage and separation of municipal waste streams for the development to maximise recycling opportunities.
- Design for longevity of the use

17.11 The Statement sets out the Key Commitments; Bill of materials, Recycling and waste reporting form. The measures are considered to be acceptable

17.12 Construction waste. A Site Waste Management Plan (SWMP) has been produced for plot A and the wider masterplan to reduce and manage/re-use waste during demolition and construction. This is to inform a Resource Management Plan. The document is also expected to set out the waste management options either on- or offsite of the various waste types expected in line with the waste hierarchy, through the following routes: reduce, reuse, recycled, recover and dispose. It is recommended that this is secured by a planning condition.

17.13 Water consumption. In order to ensure compliance with London Plan Policy SI5, it is recommended to use a planning condition to minimise the use of mains water in line with the Operational Requirement of the Building Regulations (residential development) to achieve mains water consumption of 105 litres or less per head per day and achieve BREEAM 'Excellent' standard for 'Wat 01' water category or equivalent (commercial development).

17.14 Thames Water have not raised concerns over the ability of the water network infrastructure to accommodate the needs of the proposed development, on the basis that no surface water connection is being made for the northern part of the site. However, they note that upgrade works will be required to facilitate the development and have suggested a condition to restrict future development until necessary infrastructure is provided and this is recommended by officers. Thames Water has also recommended that grease separators are installed in all commercial hot food premises and an informative regarding working near their assets. These will be conditioned.

17.15 Considerate Constructors Scheme. The applicant's Site Construction Management Plan states that the principal contractor would be required to manage sites and achieve formal certification under the Considerate Constructors Scheme. It is recommended that this is secured by a S106 planning obligation

17.16 Other environmental sustainability issues. Movement and transport, Landscape and ecology, air quality, noise, daylight and sunlight, flood risk and drainage are addressed in detail in other sections of this report.

18 **Flood Risk, Drainage and Water Infrastructure**

18.1 Policy DM28 Protecting and Enhancing Watercourses and Flood Defences states that a new development must be set back at a distance of 8 meters from a main river and 5 meters from an ordinary watercourse, or at an appropriate width as agreed by the Council and the Environment Agency, in order to provide an adequate undeveloped buffer zone.

18.2 It notes that development proposals on sites containing a main river or ordinary watercourse will be required to demonstrate how the objectives of the Thames River Basin Management Plan an

18.3 London River Restoration Action Plan have been taken into account. All major development will be required to investigate and secure the implementation of environmental enhancements to open sections of the river or watercourse; and investigate and secure the implementation of measures to restore culverted sections of the river or watercourse.

18.4 Development proposals must comply with the NPPF and its associated technical guidance around flood risk management. London Plan Policy SI12 requires development proposals to ensure that flood risk is minimised and mitigated and that residual risk is addressed.

18.5 London Plan Policy SI13 and Local Policy SP5 expect development to utilise Sustainable Urban Drainage Systems (SUDS).

18.6 Policies DM24, 25, and 29 continue the NPPF and London Plan approach to flood risk management and SUDS to ensure that all proposals do not increase the risk of flooding. DM27 seeks to protect and improve the quality of groundwater.

18.7 London Plan Policy SI5 requires proposals to ensure adequate wastewater infrastructure capacity is available.

Flood Risk

18.8 The majority of site is in Flood Zone 1 and has a low probability of flooding from tidal and fluvial sources. The central and part of the eastern extent of the site is located in flood zone 2, due to its proximity to the Moselle River (classified as a Main River), which is culverted below White Hart Lane and High Road. The site is within a Critical Drainage Area.

18.9 The submitted Flood Risk Assessment (FRA) finds the ‘daylighting’ of the Moselle River to be prohibitive on the grounds of loss of trees, water quality, service diversions, impact on transport services, loss of public realm, impact on stadium access and the land take required to provide the river channel. The report sets out that the reserved matters

submissions will consider localised covered openings, installation of a water wheel and above ground watercourse markers. Subsequently, the applicant considered that the 8 metre easement requested by the Environment Agency can be reduced to 3 metres, in line with build over agreements for public sewers.

18.10 Plot A and parts of the outline site (blocks F and G) are at low-high risk of surface water flooding. The risk of flooding from the sewers is considered to be low. The site is also at risk of ground water flooding, particularly to basement levels. Risks of flooding from reservoirs is considered to be very low to negligible. Proposed mitigation measures include:

- The finished floor levels of plots F and G being 300mm above the estimated flood level with no ground floor level uses being 'more vulnerable' uses.
- Site levels that fall away from building thresholds and directed towards drainage features (including plots A1, A2 and A3).
- Adoption of sustainable urban drainage solutions that seek to reduce discharge rates by 70% in the northern and 40% in the southern part of the site (designed to prevent above ground flooding in the 1 in 100 year storm event including a 40% allowance for climate change). This could include attenuation tanks, rainwater harvesting, green roof and blue roof systems and permeable paving, detention pond and flow controls
- Basement waterproofing
- Provision of flood evacuation routing for plots F and G.

18.11 Foul water from Plot A is proposed to be discharged to the existing Thame Water foul sewers which will be subject to consent from Thames Water. A similar arrangement is proposed for the outline part of the site. It is estimated that foul flows would be 2.8 l/s for Plot A, 23 l/s for the northern part of the site and 68.2 l/s for the southern part of the site. This would represent a significant increase from the estimated foul water discharge from the existing site. Since all surface water is proposed to be discharged to a dedicated surface water sewer and there are no known issues associated with lack of capacity of the existing foul water sewer network, the risk of flooding from the foul sewers is considered to be low.

Drainage

18.12 The proposed surface water drainage strategy takes account of likely increased rain fall as a result of climate change, factoring in a 40% increase in peak rainfall intensity. A variety of SuDS features are proposed to be incorporated, in accordance with the London Plan drainage hierarchy.

18.13 The surface water drainage arrangements for plot A are to discharge to the existing public surface sewer by gravity connection. The discharge rate will be limited to a 70% reduction against the existing flows in a 1 in 100 year storm event (20.5 l/s). The water will

be attenuated through the use of a roof garden, rain garden, permeable paving and below ground attenuation to achieve a storage volume of 129 cubic metres.

18.14 The surface water for the outline part of the scheme will be restricted discharge to the existing surface water sewer at a rate of 115.4 litres per second (a 70% reduction to existing). With green roofs, rain gardens, permeable paving, below ground attenuation, a detention basin and bioretention providing a storage volume of 641 cubic metres. An increased storage volume will be required if the independent permissions come forward.

18.15 The Council as Lead Local Flood Authority has no objection to the proposed drainage arrangements subject to conditions to secure a detailed surface water scheme and associated management and maintenance plan for the outline part of the site. The Environment Agency has no objection subject to conditions for surveys, a buffer zone and Piling/Foundations Method Statement. Thames water raises no network infrastructure capacity objections in relation to foul water or surface water. The aforementioned conditions could reasonably be imposed.

19 **Air Quality**

19.1 London Plan Policy SI 1 requires development proposals to not worsen air quality and be at least Air Quality Neutral and calls for large-scale EIA development to consider how local air quality could be improved. The London Plan is supported by the Construction Dust SPG.

19.2 Policies DM4 and DM23 require development proposals to consider air quality and be designed to improve or mitigate the impact on air quality in the Borough and improve or mitigate the impact on air quality for the occupiers of the building or users of development. Air Quality Assessments will be required for all major developments where appropriate. Where adequate mitigation is not provided planning permission will be refused. Haringey is an Air Quality Management Area (AQMA).

19.3 The application is supported by an Air Quality Assessment, which includes an Air Quality Neutral Assessment, and an Air Quality Positive Statement. The applicant's Site Construction Management Plan also sets out minimum standards and procedures for managing and minimising dust and air quality impacts.

19.4 The applicant's Assessment considers ground floor NO2, PM10 and PM2.5 exposure at plots A2, C, F, I4 and N1 and 14 sensitive receptors to poor air quality and finds that the site, including the High Road and White Hart Lane frontages, would be below air quality objective levels for in the 2025 scenario.

19.5 The proposed scheme is envisaged to be 'Air Quality Neutral' (with expected emissions associated with transport and buildings falling below air quality benchmark values) and has been designed to minimise potential adverse air quality effects

- The proposed layout is to be designed to avoid creating street canyons where pollutants could be trapped and the proposed streets and spaces are to follow TfL's Healthy Streets approach which encourages walking and cycling;
- The scheme is envisaged to deliver a relatively low level of on-site car parking with an excess of 20% active Electric Vehicle Charging Points (EVCPs) and passive provision for remaining spaces to have EVCPs;
- Some homes are likely to require Mechanical Ventilation (with the need to open windows limited to purge scenarios necessary to clear the room of smells etc), but with the choice to open windows; and
- The proposed connection to an off-site District Energy Network means that there would be no onsite emissions from boilers.

19.6 The applicant's Assessment does identify potential minor – major adverse effects from dust during the demolition and construction. The Construction Environmental Management Plan sets out measures to minimise dust emissions including care programming of dust generating activities, provision of screening and the use of dampening systems. The Pollution Team raised no objection to the proposal subject to conditions. It is recommended that detailed construction management plans for each phase of the development and other mitigations are secured, by planning condition.

20 **Wind and Microclimate**

20.1 London Plan Policy D8 seeks to ensure that public realm areas are well-designed, including, ensuring that microclimate considerations such as wind are taken into account to encourage people to spend time in a place. London Plan Policy D9 calls for proposed tall buildings to carefully consider wind and other microclimate issues. Policy DM6 states that proposals for tall buildings should consider the impact on microclimate and Policy AAP6 requires a high-quality public realm for developments in Tottenham.

20.2 Chapter 16 of the ES reports on an assessment of the likely significant effects of wind. The illustrative masterplan was used for the microclimate analysis of the outline part of the scheme. The ES adopts significance criteria that are based on the Lawson Comfort Criteria for 'sitting', 'standing', 'strolling', 'walking' and 'uncomfortable'. It goes on to report on an iterative process of testing and adapting assumed integrated mitigation features, before identifying likely significant residual effects. As with other topics, the assessment in the ES takes account of subsequent permissions.

20.3 Chapter 16 of the ES has been reviewed by an independent specialist consultancy appointed by the Council. Likely significant wind effects are assessed in the ES by a computation fluid dynamics (CFD) led approach, validated by wind tunnel testing. Whilst account has been taken of the likely significant temporary effects during construction, the officer summary below focuses on permanent effects.

20.4 With identified mitigation in place (including trees and soft landscaping, canopies, vertical screens/balustrades etc), the residual effects identified in the ES have been agreed and are set out in table 23 below.

Table 23: summary of wind effects

Issue	Likely Significant Effect	Mitigation Measures	Likely Residu alEffect
Demolition and Construction			
On-Site	Negligible	None required	Negligible
Off-Site	Direct, temporary, local,adverse effect of minor significance	Mitigation measures in place prior to completion ofProposed Development. Secured by appropriately worded planning condition	Negligible
Strong Winds	Negligible	None required	Negligible
Completed and Operational Development (Configuration 3)			
On-Site			
Thoroughfares	Negligible	None required	Negligible
Entrances	Negligible	None required	Negligible
Bus Stops	Negligible	None required	Negligible
Ground Level Amenity – MixedUse	Negligible	None required	Negligible
Ground Level Amenity – Seating	Negligible	None required	Negligible
Ground Level Amenity – Seating	Direct, permanent, local,adverse effect of minor significance (Measurement locations108, 189 and 495)	Mitigation measures, suchas those suggested in paragraph 16.6.2.8, to be determined at reserved matters stage	Negligible (with developed measures atreserved matters stage)
Balconies (Plot A /Phase 1A)	Negligible	None required	Negligible

Roof Level Amenity – Mixed Use	Negligible	None required	Negligible
Pedestrian Crossings	Negligible	None required	Negligible
Strong winds	Negligible	None required	Negligible
Off-Site			
Thoroughfares	Negligible	None required	Negligible
Entrances	Negligible	None required	Negligible
Bus Stops	Negligible	None required	Negligible
White Hart Lane Overground StationPlatform	Negligible	None required	Negligible
Ground Level Amenity – Seating	Direct, permanent, local,adverse effect of moderate significance (Measurement location 107)	Mitigation measures, such as those suggested in paragraph 16.6.2.8, to be determined at reserved matters stage	Negligible (with developed measures at reserved matters stage)
Pedestrian Crossings	Negligible	None required	Negligible

20.5 The independent review of the microclimate assessment found the applicants approach to the microclimate assessment to be acceptable. Some concerns were raised in relation the lack of testing for construction phases, not isolating plot A buildings in the assessment, lack of assessment of proposed seating, play areas, cycle routes and the lack of explanation for some aspects of the model.

20.6 It is recommended conditions are attached to the permission to ensure that appropriate additional microclimate assessment work takes place and suitable mitigation is delivered as part of the scheme. Subject to this, officers consider that the proposed scheme would result in an acceptable wind environment.

21 **Trees**

21.1 The NPPF (Para. 131) stresses the importance of trees and makes clear that planning decisions should ensure that new streets are tree-lined. London Plan Policy G7 makes clear

that development should seek to retain and protect trees of value and replace these where lost.

21.2 The applicant's Tree Survey records 134 trees (groups of trees and hedgerows) on and immediately adjacent to the site. Of these trees, 2 are Category A (the highest quality), 61 are Category B, 66 are Category C and 5 are Category U (unsuitable for retention). The Council's records do not indicate there are any trees on the site subject to a Tree Protection Order (TPO).

21.3 The proposals result in the loss of 67 arboricultural features. This includes 27 x Category B, 39 x Category C and 1 x Category U. Two mature prominent Category A London Plane trees (T5 & T63), on the High Road, would be retained and protected – two on the site near the High Road footway and two in the footway itself – would be retained. The arboricultural assessment estimates that approximately 236 new trees will be planted, representing a replacement ratio of 4:1. The assessment sets out suitable tree protection measures for plot A.

21.4 For the outline part of the scheme, it is recommended planning conditions are attached to the permission requiring further arboricultural assessment that details appropriate mitigation measures and tree protection measures for each subsequent reserved matters application.

22 **Urban Greening and Ecology**

Urban Greening

22.1 London Plan Policy G5 sets out the concept and defines Urban Greening Factor (UGF) as a tool used to evaluate and quantify the quality of urban greening provided by a development and aims to accelerate greening of the built environment, ensuring a greener London as it grows. It calls on boroughs to develop their own UGF targets, tailored to local circumstances, but recommends an interim target score of 0.40 for proposed development that is predominantly residential.

22.2 The applicant's Design and Access Statement includes a calculation of the Urban Greening Factor (UGF) for the proposed scheme. This envisages that the illustrative masterplan would have a UGF of 0.22 (an uplift of 0.15). Given that the proposal is envisaged to deliver an urban greening score increase, a substantial quantum of tree planting, seeks to optimise the provision of green roofs and provides public realm and circulatory improvements to the site, the envisaged urban greening score is considered to be acceptable. It is recommended that planning conditions are imposed to secure details of the green roof construction and soft landscaping and increased UDF where possible.

Ecology

22.3 London Plan Policy G6 calls for development proposals to manage impacts on biodiversity and to aim to secure net biodiversity gain.

22.4 Local Plan Policy SP13 states that all development must protect and improve sites of biodiversity and nature conservation. In addition, Policy DM19 makes clear that development on sites adjacent to internationally designated sites should protect and enhance their ecological value and Policy DM20 supports the implementation of the All London Green Grid. AAP Policy AAP6 states that proposals for tall buildings that fall within 500m of a Special Protection Area (SPA)/Ramsar area need to ensure no adverse effects.

22.5 The applicant's Ecological Appraisal Report (ES Appendix 10.1) sets out the findings of a phase 1 habitat survey, which concludes that the site is dominated by hardstanding and buildings, offering limited ecological value. Mixed scrub, temporary grass and clover leys, urban street trees and a culverted river are other habitats in the site boundary. The most significant habitat identified is the green corridor on the western boundary. The corridor comprises dense scrub and young- semi-mature trees which is a priority habitat and a designated Green Corridor.

22.6 No bats or evidence of bats was identified during the ground level assessment of the site and buildings. However, 1 building and 1 structure were identified as having potential for roosting bats. Emergence and pre-dawn re-entry surveys found no evidence of roosting bats within the building. The structure (culverted river exit), was found to contain common and soprano pipistrelle. Pipistrellus pygmaeus bats were recorded to be foraging either side of the River Moselle (to the west of the culvert entrance), as well as commuting noctule and *nathusius pipistrelle* and *Pipistrellus nathusii* (single pass of each species). Bat activity along the adjacent railway embankment is considered likely. It is likely that works to the culvert will require an European Protected Species Licence.

22.7 The Ecological Appraisal Report identified the site as having some potential for nesting birds.

22.8 The report recommends the landscaping includes native species planting, including buffer planting adjacent to the green corridor and living roofs and bird, bat and bee boxes integrated into buildings and landscaped areas. The report also recommends that a lighting strategy is devised to minimise lighting of ecological features. It is recommended that further ecological assessment and associated mitigation and enhancement measures are secured by planning condition.

Habitats Regulation

22.9 Given the proximity of the application site to two designed European sites of nature conservation, it is necessary for Haringey as the competent authority to consider whether there are any likely significant effects on relevant sites pursuant to Section 63(1) of the Conservation of Habitats and Species Regulations 2017 ("the Habitats Regulations").

22.10 The application site is approx. 1.22km west of the Lea Valley Special Protection Area (SPA). The Lea Valley area qualifies as a SPA under Article 4.1 of the Birds Directive on account of supporting nationally important numbers of species. This area is also a Ramsar site. The Lee Valley SPA/Ramsar comprises four underpinning Sites of Special Scientific Interest (SSSIs).

22.11 The application site lies approx. 5.05 km west of the Epping Forrest Special Area of Conservation (SAC). However, it is within 6.2km the Zone of Influence (ZOI) as defined by Natural England in its Interim Guidance. The Epping Forest SAC is one of only a few remaining large-scale examples of ancient wood-pasture in lowland Britain and has retained habitats of high nature conservation value. Epping Forest SAC is also subject to a SSSI designation.

22.12 The Lea Valley SPA site is carefully managed to avoid impacts, with only limited access allowed to the wetland itself, with access closed seasonally to avoid impacts to wintering bird populations. As such, adverse effects as a result of increased recreational pressure are not considered likely. Likewise, the proposed scheme, with its limited car parking provision and promotion of use of electric vehicles by providing Electric Vehicle Charging Points is not expected to result in an adverse air quality effect.

22.13 The Habitat Regulations Assessments (HRA) for alterations to the Strategic Polices and The Tottenham AAP both conclude that there will be no likely significant effect on Epping Forest SAC through increased recreational pressure as nowhere within the Borough lies within the core recreational catchment for the site. The proposed development is envisaged to be largely care free (on-site mobility car parking spaces are to be provided alongside car parking for returning residents). Epping Forest SAC is not conveniently accessible by public transport and there are numerous high quality public open spaces that can be conveniently accessed in reasonable travel distance from the site. The potential risks to the SAC are further reduced by the proposed integration of greenspace within the proposed scheme, providing a link between residents and nature and that no direct or indirect significant adverse effects on Epping Forest SAC are expected as a result of the proposed scheme. Therefore, it is considered that there is no need for an appropriate assessment or mitigation. Notwithstanding this, the applicant has produced a 'shadow' Appropriate Assessment that confirms that the proposal would not adversely impact upon Epping Forest SAC. The applicant has offered up a £50,000 (SANGs) financial contribution to the improvement of Bruce Castle Park as interim mitigation whilst the park on site is being delivered. This would add value to an existing recreational opportunity to future residents of the site, that would likely further reduce recreational pressure on Epping Forest SAC. The financial contribution will be secured by legal agreement.

22.14 Natural England has reviewed the application and believes the financial contribution towards improving Bruce Castle Park should be treated as mitigation which triggers the need for an appropriate assessment. Officers do not agree and consider the development would not give rise to likely significant effects on European designated sites (Lee Valley SPA and Epping Forest SAC) pursuant to Section 63(1) of the Conservation of Habitats and Species Regulations 2017 ("the Habitats Regulations"). An appropriate assessment is therefore not considered to be required and the proposal is in accordance with Policies SP13 and DM19.

Biodiversity Net Gain

22.15 The applicant's biodiversity net gain design stage report sets out how 3.0 Metric was used to calculate Biodiversity Net Gain For the site. The calculation states that the existing site has a Biodiversity value of 3.18 and envisages that the proposed landscaping and ecological enhancement measures will achieve a biodiversity value of 5.35 (2.9 uplift in habitat units and a 90.97% positive net change of the site). The predicted uplift is largely derived from the loss of low quality existing habitats and the retention and supplementation of high quality habitats including tree and mixed shrub provisions. The envisaged net gain is significantly above the minimum 10% set out in the Environment Act. It is recommended that landscaping and ecological mitigation and enhancement details are secured by condition, along with a management and monitoring plan. Commitment to funding management and monitoring is proposed to be secured by legal agreement.

23 **Waste and Recycling**

23.1 London Plan Policy SI7 calls for development to have adequate, flexible, and easily accessible storage space and collection systems that support the separate collection of dry recyclables and food. Local Plan Policy SP6 and Policy DM4 require development proposals make adequate provision for waste and recycling storage and collection.

23.2 The applicant's Waste Management Plan for plot A and the outline element of the scheme has been developed in accordance with guidance provided by Waste officers and BS 5906:2005 Waste management in buildings – a code of practice. The key principles include:

- Commercial and residential waste would be collected separately;
- The waste collector would not be required to pull full containers more than 10m to the collection vehicle;
- A minimum clear space of 150mm would be allowed between containers;
- Waste rooms would be designed and fitted out so they could be washed down and fire resistant;

- Waste collection vehicles would not be required to reverse more than 12m;
- Access roads for waste vehicles would have a minimum clear width of 5.0m and a maximum gradient of 1:12; and
- Storage and loading areas would be level, smooth, hard surfaced and provide drop kerbs and have a maximum gradient of 1:14 if the ground slopes down towards the collection vehicle.

23.3 Residential waste, recycling and food waste would be collected weekly and storage space has been provided in accordance with the generation rates provided by waste officers. Space has also been provided for bulky/non-standard waste items. Residents would not be required to walk further than 30m (horizontal distance) between their home and their allocated waste store. Most waste stores would be externally accessible and within 10m of the proposed stopping point for the waste collection vehicle. Any waste stores further than 10m from a collection point would have the waste brought to a suitable collection point within 10m of the collection vehicle on the day of collection by the on-site management team.

23.4 For the outline part of the site, it is envisaged that traditional waste collection arrangements will be pursued and appropriate storage capabilities and collection arrangements will be designed into the residential and commercial elements.

23.5 It is recommended that planning conditions are imposed to reserve the detailed management and maintenance arrangements for plot A and secure details for the outline element of proposal.

23.6 LBH Waste officers are content with the proposed storage arrangements but requested that Plot A1 has 3 x 140 litre food waste bins as opposed to a single 360 litre bin and advised that any proposed commercial waste stores should be designed to store a weeks' worth of waste despite capabilities for regular collections. This can be secured by condition.

24 **Land Contamination**

24.1 Policy DM32 requires 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.

24.2 The applicant's Geotechnical & Geo- environmental Desk Study Report (ES Appendix 12.1) contains a Preliminary Contaminated Land Risk Assessment. The report acknowledges that the previous use of the site results in a potential for land and water contamination. It concludes by identifying Low to Moderate potential risks to a range of receptors, including construction workers and potential residents and recommends that an in intrusive ground investigation is carried out to appraise the extent of Made Ground, the gas

regime and the groundwater regime. It also recommends that an Unexploded Ordnance survey is undertaken.

24.3 LBH Pollution officers raise no objection, subject to conditions relation to Land Contamination and Unexpected Contamination, Construction Environmental Management Plan (CEMP), Air Quality Assessment and Plant. It is proposed to impose the recommended conditions.

25 **Basement Development**

25.1 Policy DM18 relates to new Basement development and sets out that the construction of new basements, including in existing dwellings will only be permitted where it can be demonstrated that the proposal;
a Will not adversely affect the structural stability of the application building, neighbouring buildings and other infrastructure, including the adjoining highway, having regard to local geological conditions;
b Does not increase flood risk to the property and nearby properties from any source
c Avoids harm to the appearance or setting of the property or the established character of the surrounding area;
d Will not adversely impact the amenity of adjoining properties by reason of noise or increased levels of internal or external activity;
e Will not adversely impact the local natural and historic environment;

25.2 These points are addressed through a Basement Impact Assessment (BIA).
25.3 The parameters for Plots M, J, L and K include basements with finished floor levels of 7.00 AOD, 8.23 AOD and 7.77 AOD respectively. The basements to plots M, J and L will be at least approximately 13 metres and 25metres from the railway track, respectively. The railway track is situated on an embankment that is approximately 3 metres above the surrounding ground level.

25.4 Officers and Building Control are satisfied that principles set out in the outline Basement Impact Assessment are acceptable. It is recommended that a planning condition is imposed to secure a detailed basement impact assessment prior to the commencement of development on plots M, J, L and K.

26 **Archaeology**

26.1 The NPPF (para. 194) states that applicants should submit desk-based assessments, and where appropriate undertake field evaluation, to describe the significance of heritage assets and how they would be affected by the proposed development.

26.2 London Policy HC1 states that applications should identify assets of archaeological significance and avoid harm or minimise it through design and appropriate mitigation. This approach is reflected at the local level in Policy DM9

26.3 The Site is located within The Lea Valley and Ermine Street Archaeological Priority Areas; therefore, there is potential for below ground heritage assets to be present.

26.4 Chapter 8 of the ES (which is supported by an Archaeological Desk Based Assessment) reports on an assessment of the likely significant effects on archaeology. The White Hart Lane and High Road frontage parts of the site form part of an Archaeological Priority Area, due to evidence of a Medieval settlement with possible Anglo-Saxon roots and the presence of a former Roman road (Roman Ermine Street). Following mitigation, in the form of archaeological investigation, the ES identifies a Minor Adverse residual effect.

26.5 The Greater London Archaeological Advisory Service (GLAAS) has assessed the proposal (identifying that the layout of the proposed scheme presents theoretical scope to preserve any important finds along the High Road frontage) and indicates the need for field evaluation to determine any further appropriate mitigation. GLAAS calls for a two-stage process of archaeological investigation comprising evaluation to clarify the nature and extent of any surviving remains, followed, if necessary, by a full investigation.

26.6 A meeting was held with the GLAAS in January 2022. It was agreed not to proceed with the geoarchaeological work at this stage, however it was requested that the ES provides some updated baseline information and reflects the potential for public benefits to be delivered by the Interim Scenario.

26.7 Accordingly, an update to the ES has been submitted which presents an assessment of the likely significant archaeology (buried heritage) effects of the Interim Scenario at the Southern Site. It concludes that, in consultation with The GLAAS, additional research and archaeological investigation could be undertaken at a later stage to assess opportunities to protect, promote and enhance areas of archaeological potential and that this could be implemented through an appropriately worded planning condition.

26.8 The GLAS has since recommended the imposition of four pre-commencement conditions to be imposed.

27 **Fire Safety and Security**

27.1 London Plan Policy D12 makes clear that all development proposals must achieve the highest standards of fire safety and requires all major proposals to be supported by a Fire Statement. The Mayor of London has published draft guidance of Fire Safety (Policy D12(A)), Evacuation lifts (Policy D5(B5)) and Fire Statements (Policy D12(B)).

27.2 The application is supported by a Fire Statement which sets out how the design and construction of the buildings will seek to satisfy the functional requirements of Part B of Schedule 1 to the Building Regulations 2010 (as amended, 2018), the Construction Design and Management Regulations 2015 (CDM) and the operational fire safety requirements of the Regulatory Reform (Fire Safety) Order 2005 (RRO).

27.3 The London Fire Brigade have been consulted and the Commissioner is satisfied that the statement complies with the London Fire Brigade's requirements for firefighting access. In accordance with the Mayor of London's guidance, it is recommended that a planning condition is imposed, requiring the development to be carried out in accordance with the planning fire safety strategy (included in the Fire Statement).

27.4 The development would be required to meet the Building Regulations in force at the time of its construction – by way of approval from a relevant Building Control Body. As part of the plan checking process a consultation with the London Fire Brigade would be carried out. On completion of work, the relevant Building Control Body would issue a Completion Certificate to confirm that the works comply with the requirement of the Building Regulations.

27.5 In light of the above, the application is considered to be acceptable with regard to its impact on fire safety, in accordance with national planning policy and the development plan.

28 **Equalities**

28.1 In determining this planning application, the Council is required to have regard to its obligations under equalities legislation including 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, advance equality of opportunity between people who share those protected characteristics and people who do not and to the need to promote equality of opportunity and to foster good relations between persons who share a protected characteristic and persons who do not share it. The three parts of the duty apply to the following protected characteristics: age, disability, gender reassignment, pregnancy/maternity, race, religion/faith, sex and sexual orientation. Marriage and civil partnership status apply to the first part of the duty. Members must have regard to these duties in taking a decision on this application.

28.2 The applicant has provided an Equalities Impact Assessment (EqIA) that identifies and assesses any potential impacts on groups with 'protected characteristics' as defined by the Equality Act 2010, that would arise from the delivery of the proposal. It also identifies interventions and/or mitigation measures required to reduce any adverse effects, whilst also maximising any beneficial effects on the Local Impact Area (LIA) and the LBH.

28.3 Based on the demographic and social indicators prepared as part of the ES the following groups with 'protected characteristics' have been identified:

• Children and young people (aged 0-24 years);
• Those with a disability and/or long-term limiting illnesses;

• BAME communities including African, Middle Eastern and Asian Communities; and
• Muslim community.

28.4 The baseline analysis has also identified crime (and the perception of crime) and overcrowding as two key challenges affecting priority groups within the LIA.

28.5 Evidence provided by the Applicant indicates that there are currently 85 businesses located across the Site (which together support an estimated 690 FTE jobs), and which are likely to be impacted by demolition and construction activity associated with the Proposed development . A Commercial Relocation Strategy which seeks to support local businesses and reduce the overall impact of regeneration on local businesses has been prepared in 2018 and its implementation will be secured by S106 obligation.

28.6 The proposal will support the delivery of a range of socio-economic and regeneration outcomes for the LBH more widely. In total, the proposal will see the delivery of up to 2,612 new homes, of which up to 2,300 will be net additional to the LIA. Once completed, the proposal will help reduce overcrowding and see the number of (affordable) social rented units doubled (from 251 to 500 units), whilst also providing a variety of tenancies (such as Social Rent and Shared Ownership).

28.7 The demolition and construction phase of the proposal has potential to support up to 2,416 FTE jobs (i.e. both directly and more widely through indirect/supply chain and induced effects). In addition, once completed the development has the potential to accommodate up to 675 FTE jobs on-Site, of which 453 are estimated to be net additional once deadweight and displacement are taken into consideration. Finally, the proposal will support the delivery of an improved public realm (including new parks and open space, residential amenity and local playable space).

28.8 The nature of the effects considered vary depending on the priority group considered, and range from minor adverse when considering the effect of demolition and construction activities on business, organisations and employees, to negligible and beneficial when considering the effects of the proposed development. The equalities impacts of the development are therefore considered to be acceptable.

29 **Other matters**

29.1 Overlapping planning permissions – The submitted parameters plans and design code facilities the delivery of the extant planning permissions and extant planning applications with resolutions to grant planning permission, that are yet to be determined. Notwithstanding this, the independent delivery of these permission could result in a scenario whereby the implementation of one permission renders development pursuant to the other permission unlawful. In that event, it will be the liberty of the Local Planning Authority to determine whether it is expedient to take enforcement action against such a breach of planning control, in line

with the adopted enforcement plan. In the event that members resolve to grant planning permission, Officers are satisfied that mechanisms exist, through S106/ the use of planning conditions, to ensure that necessary mitigation secured by previous planning permissions on the site remain secure.

30 **Conclusion and Planning Balance**

30.1 The proposed scheme would result in a residential-led mixed-use development for the remaining parts of the High Road West NT5 Site Allocation. The application has been submitted in a manner that would allow independent delivery of parts of the site that already have permission/ resolutions to grant permission. Whilst the proposed development does not fully conform with the 2014 masterplan, Officers are satisfied that the proposal makes efficient use of the site and delivers on the masterplan vision and principles, to the benefit of the community. Departures from the HRWMF include:

- The scale of the proposed buildings and the manner and degree in which they descend in height
- Whilst community buildings and commercial users are proposed to front Moselle Square they do not explicitly provide leisure space opposite the stadium to create a sport and leisure destination for north London or include the provision of tennis courts or other formal sports provision in the park
- The minimum parameters do not deliver a net increase in commercial floorspace
- The proposal does not enhance and include the re-use of heritage assets
- The proposal does not include the re-activation of the railway arches
- The proposal does not conform with the previous London Plan density guidelines
- The proposal does not include the quantum of parking envisaged by the HRWMF

30.2 These departures are considered necessary to make efficient use of the site and secure the delivery of a range of public benefits including the provision of additional homes (including affordable, accessible and family housing), provision of significant public realm enhancements, provision of a new civic square, provision of a new public park, provision of new and enhanced pedestrian and cycle connections across the site, the provision of a direct route from the stadium to White Hart Lane Station, biodiversity enhancements and the provision of highly water and energy efficient homes.

30.3 Officers welcome the proposed site layout, providing a substantial public park and civic square amongst other public realm, a vehicular/cycle/ pedestrian connection to Cannon Road and safeguarding a potential east-west pedestrian cycle route over the rail line.

30.4 The affordable housing offer is a minimum of 35% affordable housing by unit with a target of 40% provision by unit (subject to viability and grant funding). The proposed dwelling mix meets the Housing Strategy preferred target and affordable homes are envisaged to be satisfactorily integrated with market housing across the site. Officers consider that the offer

would be acceptable, subject to s106 planning obligations securing viability reviews and ensuring affordability.

30.5 The proposed scheme is not expected to have a significant adverse effect on school places or primary health care provision and, in any event, CIL payments could help fund planned additional provision to meet the demands from the expected 6,410 new residents.

30.6 The proposed maximum parameters and illustrative scheme is a higher density development (at approx. 341 and 337 units/hectare, respectively) and warrants careful scrutiny. The overall dwelling mix is envisaged to be 83.5% 1 and 2 bed units and 16.5% family sized housing and 10% of homes of various sizes would be 'wheelchair accessible'. The final quantum and mix will be determined at reserved matters stage. The proposed homes are envisaged to be high-quality and future residents are anticipated to enjoy an acceptable level of amenity (in terms of aspect, size of homes, open space, play space, outlook/privacy, daylight and sunlight, noise, wind conditions, air quality and overheating). The proposed fire strategy set out in the submitted Fire Statement is also considered acceptable.

30.7 Tall buildings are acceptable in principle in this growth area and the proposed tall buildings would be located on the western edge of the site, where the HRWMF encourages them to be located (although they would be significantly taller than the guidance suggests). The likely functional and environmental impacts of the proposed buildings are considered acceptable. Officers are satisfied that the submitted parameters and design code will facilitate the delivery of tall buildings of sufficiently high-quality to justify their proposed height and form and their likely effects on surrounding townscape. As such, it is considered that the proposed tall buildings would meet the policy tests established by the NPPF, London Plan Policy D9, Strategic Policy SP11, AAP Policy AAP6 and DPD Policies DM1 and DM6.

30.8 Whilst officers consider that the proposed scheme would result in 'less than substantial harm' to the wider setting and significance of a number of heritage assets, they consider that the proposed scheme would result in the following significant public benefits that would outweigh this harm:

- The delivery of up to 2,929 new homes including 500 new council homes, approximately 400 new intermediate units
- Delivery of a new library and learning centre
- New public spaces and public realm, including new cycle routes and a route between Tottenham Hotspur Stadium and White Hart Lane Station
- Delivery of a high quality sustainable development
- New energy centre
- Bio-diversity enhancements
- Creation of approximately 1,214 new FTE jobs and a further 1,202 FTE jobs indirectly, per annum, during construction.
- The development of local supply chains

- A £143.1 million estimated contribution to the local economy during construction
- Creation of a minimum of approximately 374 FTE jobs on site, once complete.
- A circa £23.2 million annual boost to the local economy through estimated residential expenditure per annum.
- Making a positive contribution towards the regeneration of Tottenham and acting as a catalyst for further regeneration and inward investment;
- Phasing to decant existing residents from the Love Lane Estate to high-quality housing, to facilitate its regeneration as called for in Site Allocation NT5;
- Making a positive contribution to reducing carbon dioxide emissions and surface water run-off;
- Generation of New Homes Bonus
- Generation of additional business rates and council tax

30.9 Amenity impacts must be considered in the overall planning balance, with any harm weighed against expected benefit. It is envisaged that there will be some adverse impacts on amenity, which have been identified in the report. However, officers consider that the level of amenity that would continue to be enjoyed by neighbouring residents is acceptable, given the benefits that the proposed scheme would deliver.

30.10 The proposed scheme would improve connectivity and permeability between the existing Cannon Road area and High Road and White Hart Lane, without creating a rat-run for motor traffic. The scheme is envisaged to have relatively limited car parking and generous cycle parking, in line with policy requirements, and additional road traffic would be relatively small (particularly given the proposed loss of the existing housing and commercial uses on the site and the restrictive nature of the proposed parking arrangements). Assessment by the applicant demonstrates that (when taking account of the proposed scheme and local committed development) there is unlikely to be significant impacts on London Overground line capacity or bus capacity. Planning conditions and s106 planning obligations could help manage on and off-site car parking and ensure that Car Club provision, travel planning, delivery and servicing and construction activities are satisfactory.

30.11 The proposed buildings, open space, landscaping and sustainable drainage features are envisaged to take account of climate change and to reduce carbon emissions (although expected carbon savings from built fabric performance is below what policy expects). Planning conditions could secure commitments in relation to water usage, BREEAM ‘Very Good’ for the commercial units and measures to further the Circular Economy agenda. Subject to s106 planning obligations, the scheme would be connected to the proposed Heat Network and include some roof level PVs to help deliver 64% carbon emissions savings (SAP2012 carbon factors) (with offsetting financial contributions making up the shortfall).

30.12 The proposed scheme would safeguard and incorporate mature London Plane trees along the High Road frontage and incorporate a good level of green infrastructure, despite an estimated shortfall against the London Plan Urban Greening Factor interim score target of 0.40. The proposed greening would deliver a significant Biodiversity Net Gain (predicted in excess of 90%) and officers do not consider that the scheme would give rise to significant effects (recreational pressure or air quality) on the Lee Valley or Epping Forest important European nature conservation sites.

30.13 Flood risk is low and likely environmental impacts, including noise, air quality, wind and microclimate, waste and recycling and land contamination, basement impact and archaeology could be made acceptable by use of planning conditions.

30.14 The proposed development would provide adequate space to enable Tottenham Hotspur Football Club to successfully manage crowd flows on event days. The detailed arrangements will be secured at reserved matters stage

30.15 Officers have taken full account of the findings of the submitted Environmental Statement and into account the responses to consultation and other relevant information in accordance with EIA Regulations, and other relevant legislation and guidance. The findings of the ES are referred to, where relevant, throughout the report. If planning permission were to be granted, satisfactory mitigation measures identified in this report, could be secured by planning conditions and/or s106 planning obligations.

30.16 The proposed scheme would provide an accessible and safe environment and significant additional affordable homes. Subject to securing the delivery of various features and provisions identified in this report, officers consider that the proposed scheme would have a positive equalities impact.

31 **COMMUNITY INFRASTRUCTURE LEVY (CIL)**

31.1 The estimated CIL chargeable amount is £10,000,000 subject to change and subject to:

31.2 The proposed flexible commercial uses do not come forward as a ‘supermarket’ and proposed basements serve residential development only; and

31.3 Affordable housing satisfies the criteria of Regulation 49 of the CIL Regulations (2010, as amended) and relief is granted before commencement.

31.4 If planning permission were granted, the CIL would be collected by Haringey after/should the scheme is/be commenced 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. An informative should be attached to any planning permission advising the applicant of this charge and advising them that the scheme is judged to be phased for CIL purposes.

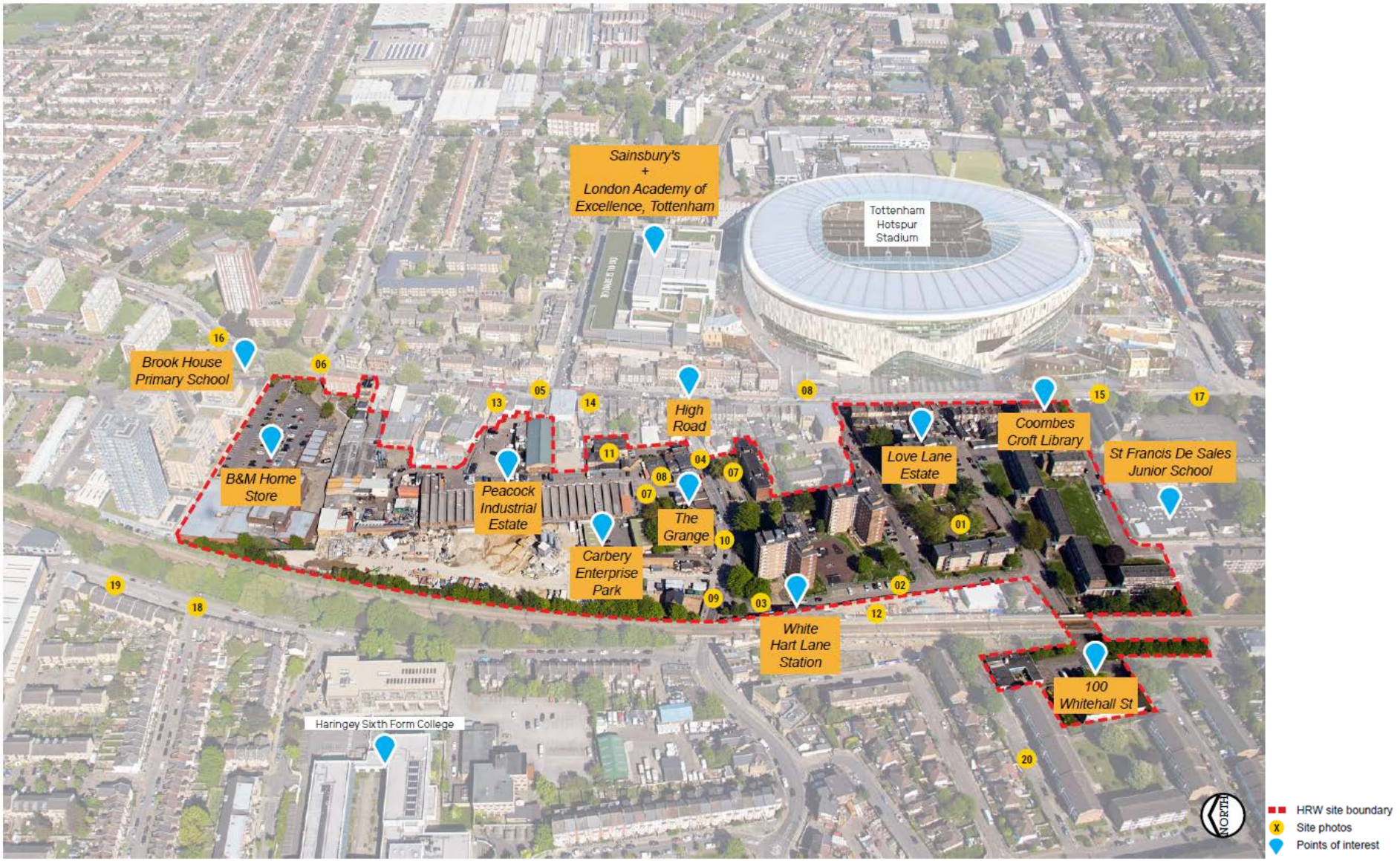
31.5 The proposed development would be liable to pay the Haringey CIL rate that is in effect at the time that any permission is granted.

32 **RECOMMENDATIONS**

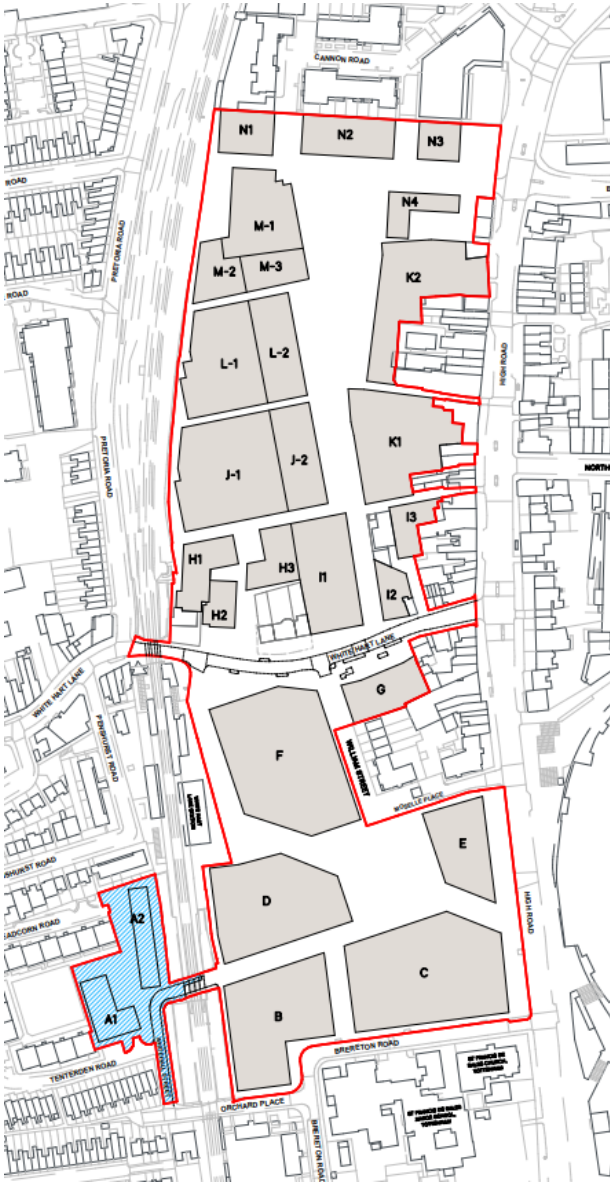
GRANT planning permission for the reasons set out above.

Appendix 1: Images of the site and proposed scheme

Satellite image showing the existing site edged in dotted red line & points of interest in the area marked in blue. North is to the left of the image



Outline and detailed (shown in blue) elements of the ‘Hybrid’ application



Existing condition of the site. The locations of the images are shown numbered on the previous page



Love Lane Estate



The High Road



Station Masters House



Brunswick Square



Brook House



Love Lane



The High Road (North)



The Grange



Percival Court



St Francis de Sales R C Junior School



White Hart Lane Station



Peacock Industrial Estate - Looking North



Chapel Place



St. Francis de Sales R.C. Church



Pretoria Road - ecological corridor



White Hart Lane



Peacock Industrial Estate - looking North East



White Hart Lane Station

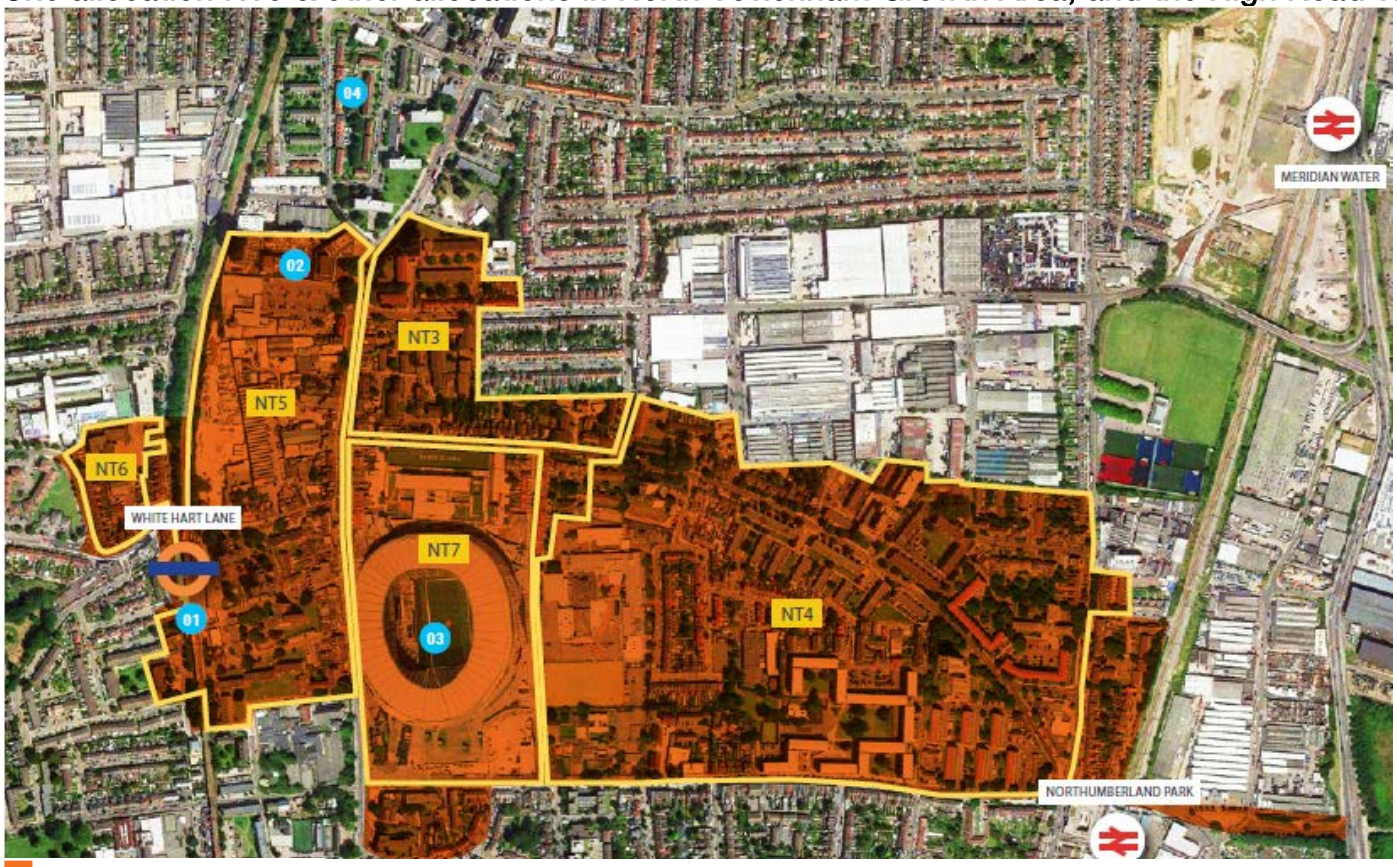


Pretoria Road



Headcorn Road

Site allocation NT5 & other allocations in North Tottenham Growth Area; and the High Road West Masterplan Framework to the right





North Tottenham Growth Area (Improvement and Investment)

Site Allocations within TAAP

01 White Hart Lane Station

02 Brook House

03 Tottenham Hotspur Stadium

04 Joyce Avenue and Snell's Park Estate Renewal (Ongoing)

Developments Within Site Allocation Area NT5

Within the NT5 allocation area, there are a number of delivered and emerging developments. Many of these are being brought forward by THFC, and have either been submitted or approved for Planning.

Brook House Development

Neighbouring the Site on the north, the Brook House development at Cannon Road (completed in 2015) has created a new residential community, providing 222 new homes and a new Primary School on the High Road.



Fig.21 - Brook House Development

The Goods Yard

Planning Application ref: HGY/2018/0187

A hybrid planning application to deliver a residential led mixed-use scheme was granted permission in 2019, delivering 316 homes across the 1.276ha site, with 1450m2 of non-residential uses. The proposal includes the refurbishment and conversion of the Station Master's House into a restaurant, and new neighbouring commercial building.



Fig.22 - The Goods Yard

The Depot

Planning Application ref: HGY/ 2019/2929

A hybrid planning application to deliver 330 homes and 270m2 of non-residential uses across the 1.2ha site. The proposal features 5 new buildings framing a central park with a café provided at ground level, and the refurbishment of the Grade-II* Listed 867-869 High Road into 6 apartments. The landmark building along the railway line is 29 storeys.



Fig.23 - The Depot

The Depot & Goods Yard (Emerging Combined Scheme)

Planning Application ref: HGY/2021/1771

A residential led mixed-use combined site scheme has been prepared on behalf of Tottenham Hotspur, with the aim of delivering a high quality neighbourhood where the two sites work together cohesively. The proposals have been submitted, and would include up to 867 new homes, and approximately 1,900m GIA commercial space across the 2.5ha site.



Fig.24 - The Goods Yard and Depot Combined Scheme

The Printworks

Planning Application ref: HGY/2021/2283

This scheme builds on the 'behind the High Street' typology to provide new, high quality homes, leisure facilities, and places to work within the heritage context of the High Road and Conservation Area. The proposal accommodates 72 homes, alongside a cinema (1,272sqm) and 302sqm of commercial space.

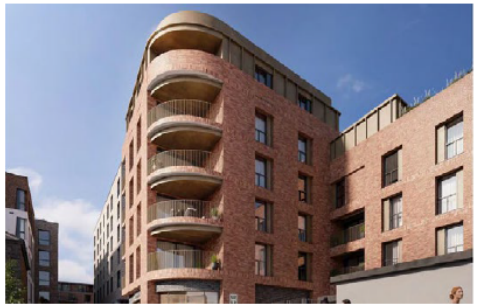


Fig.25 - The Printworks

807 High Road

Planning Application ref: HGY/2021/0441

This medium scale commercial and residential scheme takes down the existing High Road building, replacing it with an enhanced 4 storey brick building including a shop front and mansard, creating 219m2 of commercial space. Behind, a new 4 storey residential building containing 9 apartments is proposed with a first floor podium level garden linking the two buildings.



Fig.26 - 807 High Road

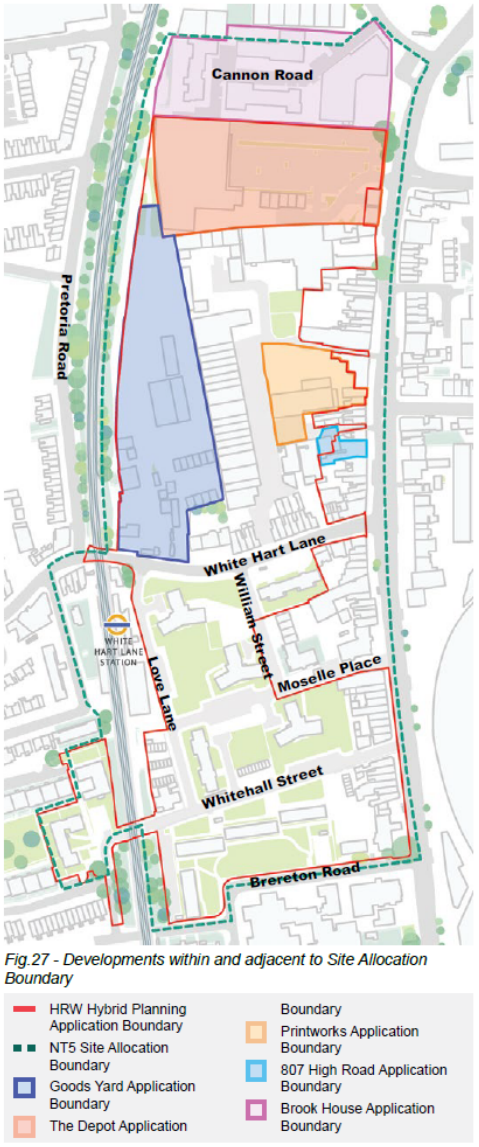


Fig.27 - Developments within and adjacent to Site Allocation Boundary

**HGY/2021/1771 was refused and is at appeal, a revised application has been submitted under HGY/2022/0563. Members resolved to grant the Printworks in January.*

Statutory & locally listed buildings

Due to its proximity to the conservation area, the Site contains, and neighbours, a number of prominent heritage assets including statutory and locally listed buildings.

Notable heritage buildings within and directly adjacent to the Site include:

Statutory listed

- The Grange, 32-34a White Hart Lane
- 867 - 869 High Road
- No. 7 White Hart Lane
- La Royale, 819-821 High Road

Locally listed

- The Station Masters House, 52 White Hart Lane
- Former Chapel and Pastor's House, Chapel Place
- St Francis De Sales Church and School
- 6A, White Hart Lane
- 743-759 High Road
- Substation (Neighbouring Coombes Croft Library and 731 High Road)

Positive Contributors (as specified in the North Tottenham Conservation Area Appraisal and Management Plan)

- 865 High Road
- 731-741 High Road
- White Hart Lane Overground Station

For detailed analysis of the significance of the conservation area and heritage assets, please refer to the Heritage Assessment included within this application.

Development Opportunity:
The specific characteristics, significance of, and impact on the setting of these buildings have informed the evolution of the outline masterplan, and should continue to inform the detailed design of future RMAs.



The Grange, 32-34a White Hart Lane



La Royale, 819-821 High Road



Station Masters House, 52 White Hart Lane



6a White Hart Lane



Former Chapel and Pastor's House



743-759 High Road



Existing Substation



The High Road (statutory and local listings)



867-869 High Road



7 White Hart Lane



797-799 High Road



St Francis de Sales Church & School

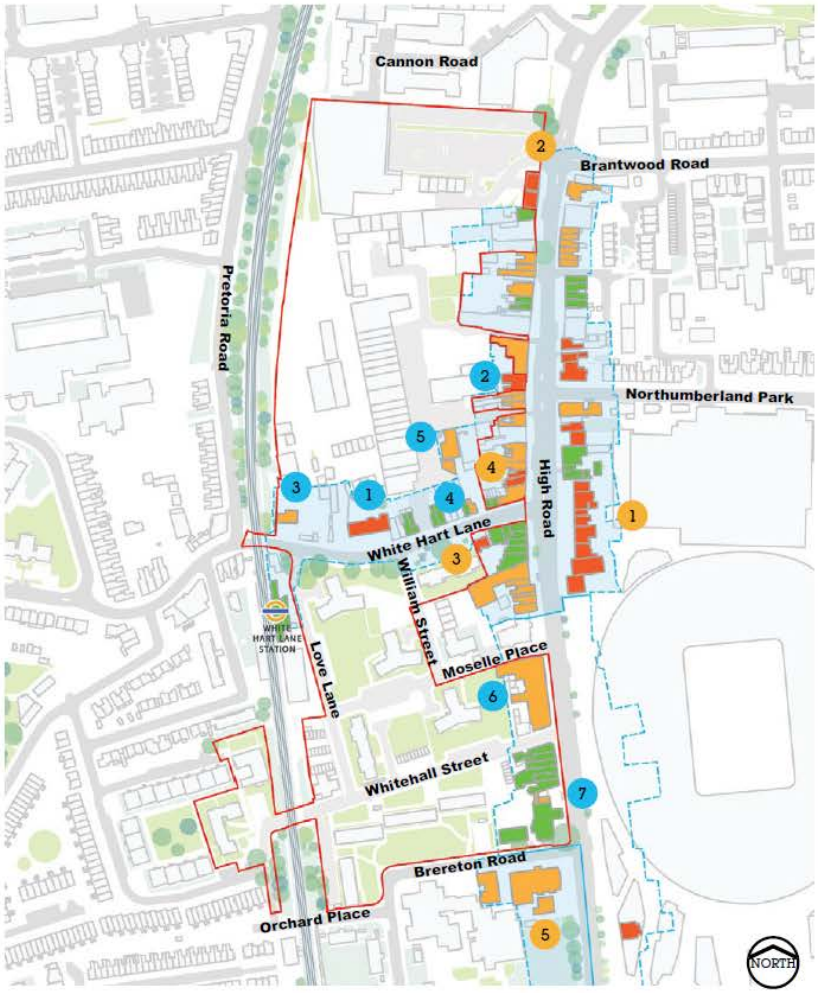


Fig.15 - Heritage & Conservation Plan

Hybrid Planning Application Boundary
North Tottenham Conservation Area
Area removed from Conservation Area
Heritage assets within the Site
Heritage assets outside the Site
Statutory Listed Building
Locally Listed Building
Positive Contributor

Masterplan

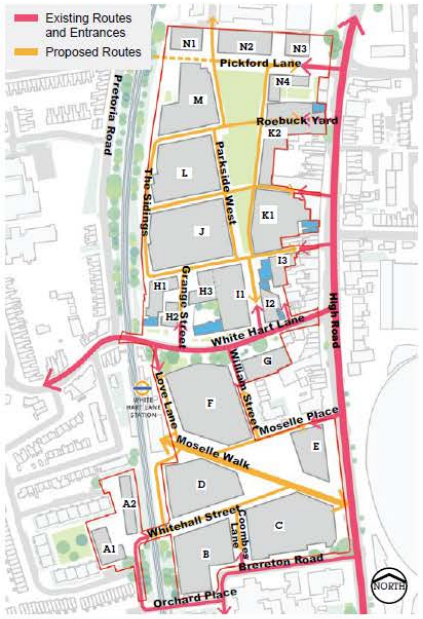


Fig.72 - A new urban grain

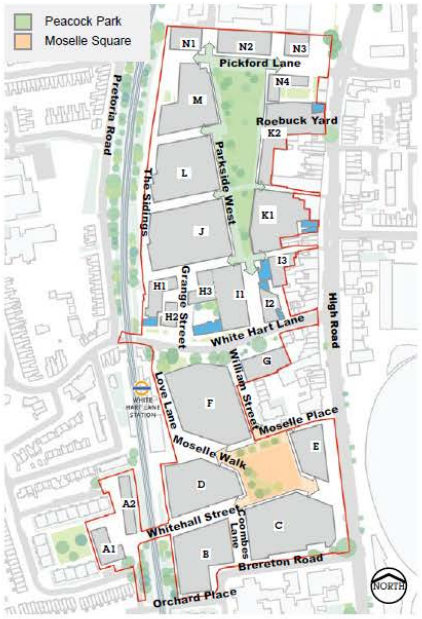


Fig.73 - Generous new open spaces

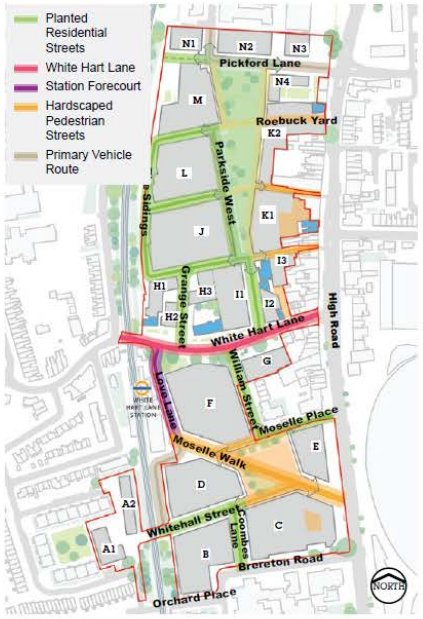


Fig.74 - An interconnected green public realm

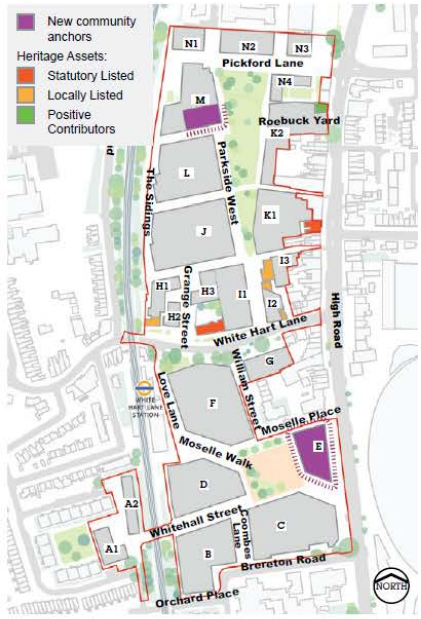


Fig.75 - Revitalising heritage assets and community anchors

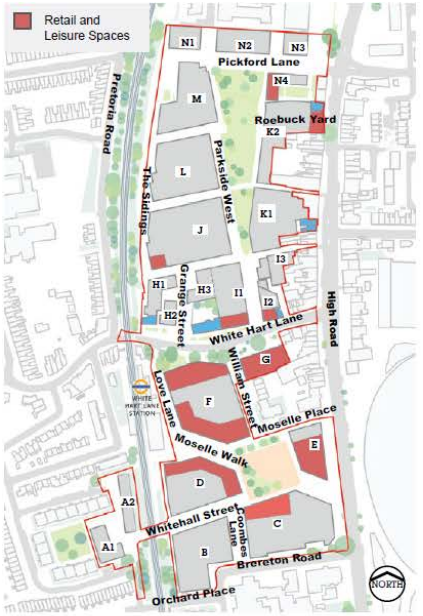


Fig.76 - New retail and leisure uses

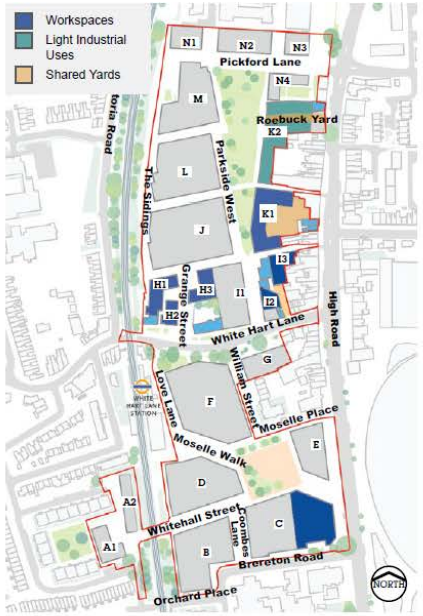


Fig.77 - New employment and industrial uses

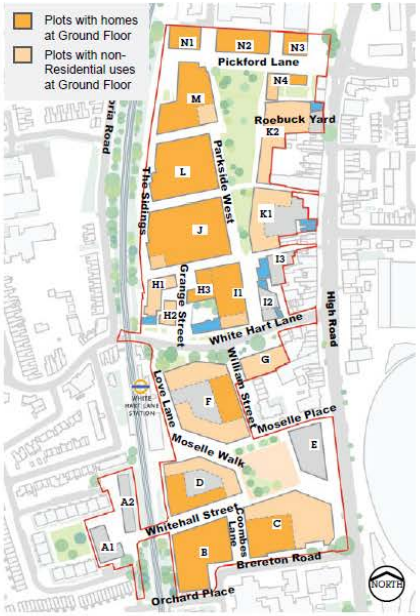


Fig.78 - New homes

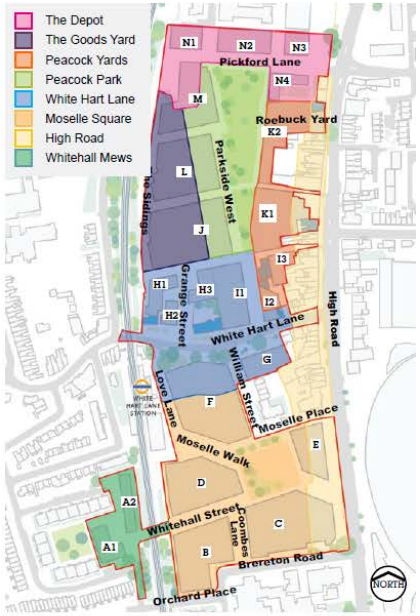


Fig.79 - A community of Key Places

Phasing (left) and affordable housing (right) plans

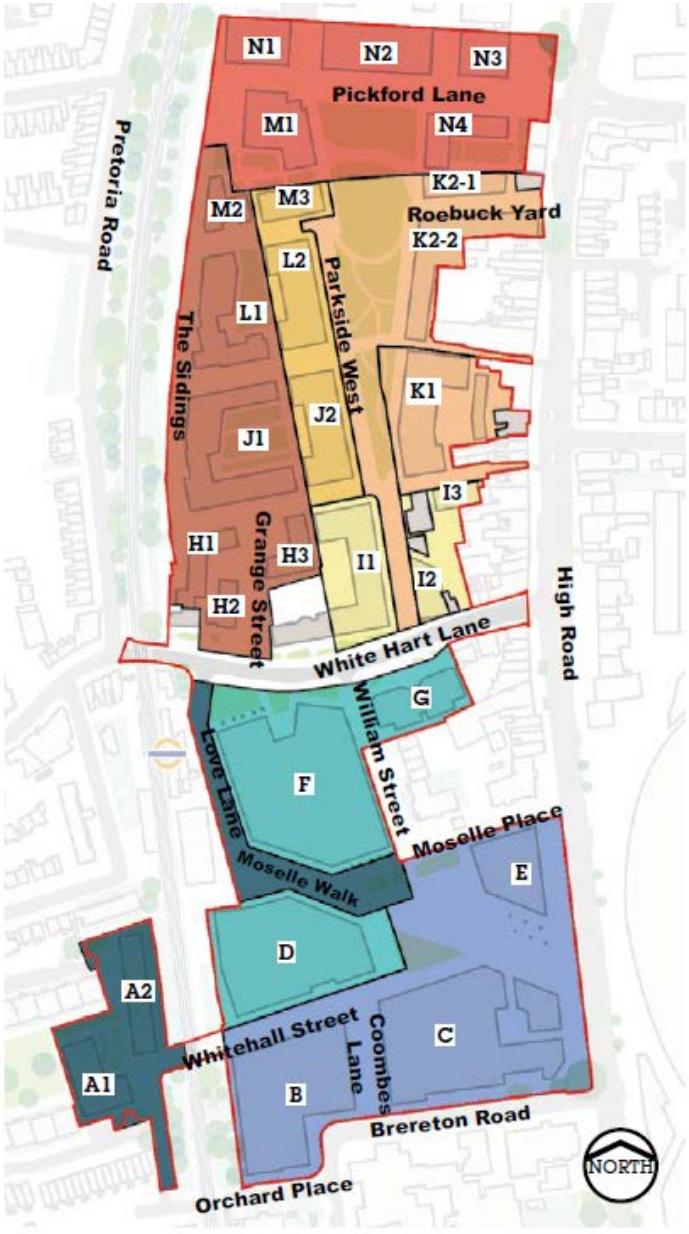


Fig.99 - Phasing diagram

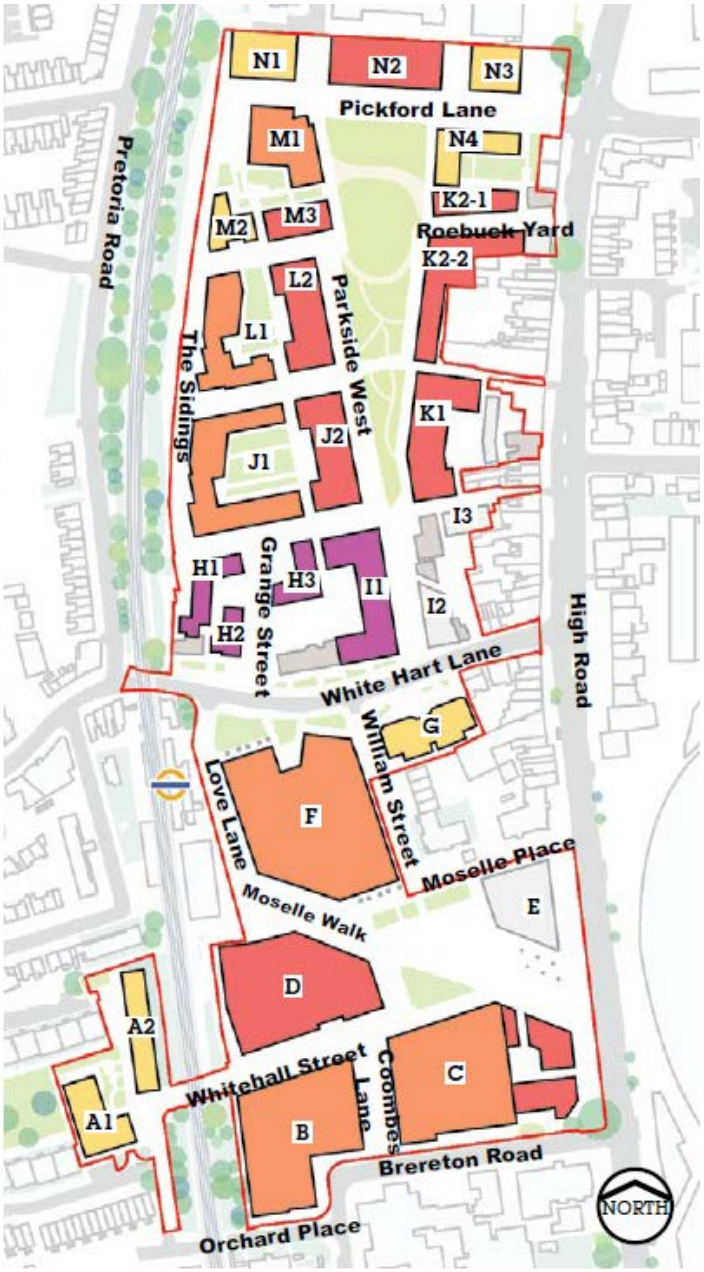
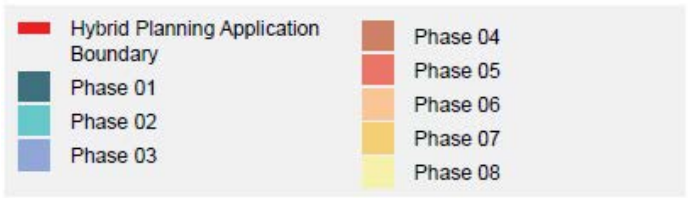


Fig.104 - Affordable Housing Plan





Aspect of homes in detailed & outline proposals



Fig.122 - Plot D - Illustrative Typical Floor Aspect Diagram

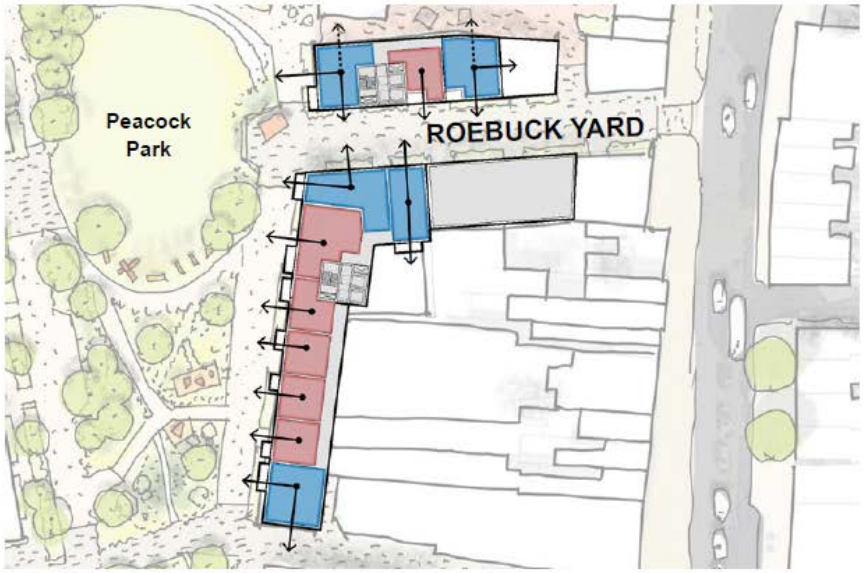


Fig.123 - Plots K2-1 and K2-2 - Illustrative Typical Floor Aspect Diagram

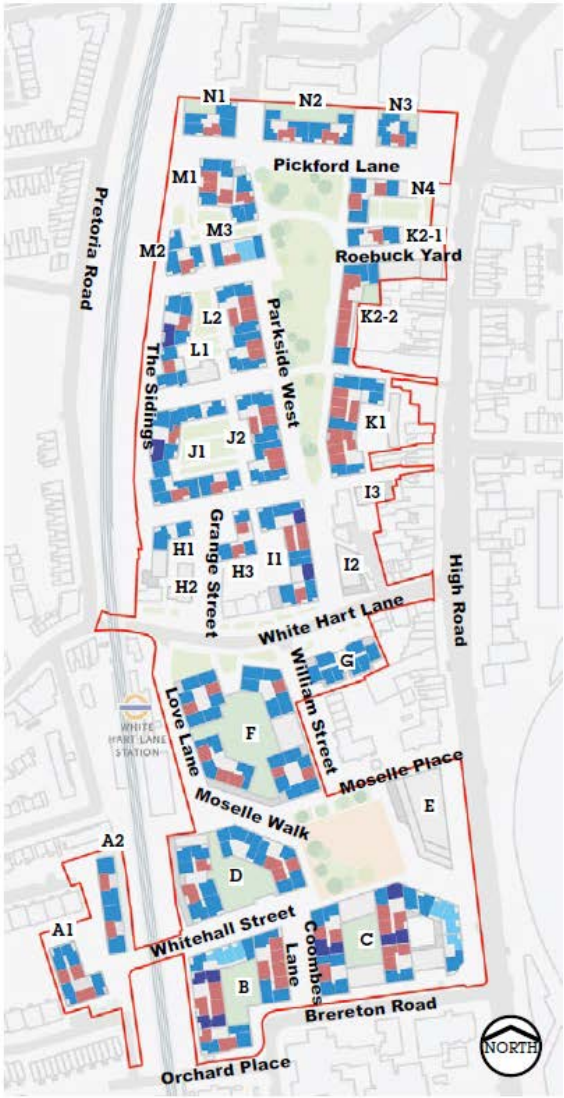


Fig.124 - Illustrative Typical Floor Aspect Diagram

- Hybrid Planning Application Boundary
- Single-Aspect Homes
- Single-Aspect Homes (Dual-Aspect above)
- Dual-Aspect Homes (Deck Access)
- Dual-Aspect Homes

Walking & cycling (left) and vehicle access & parking (right) plans

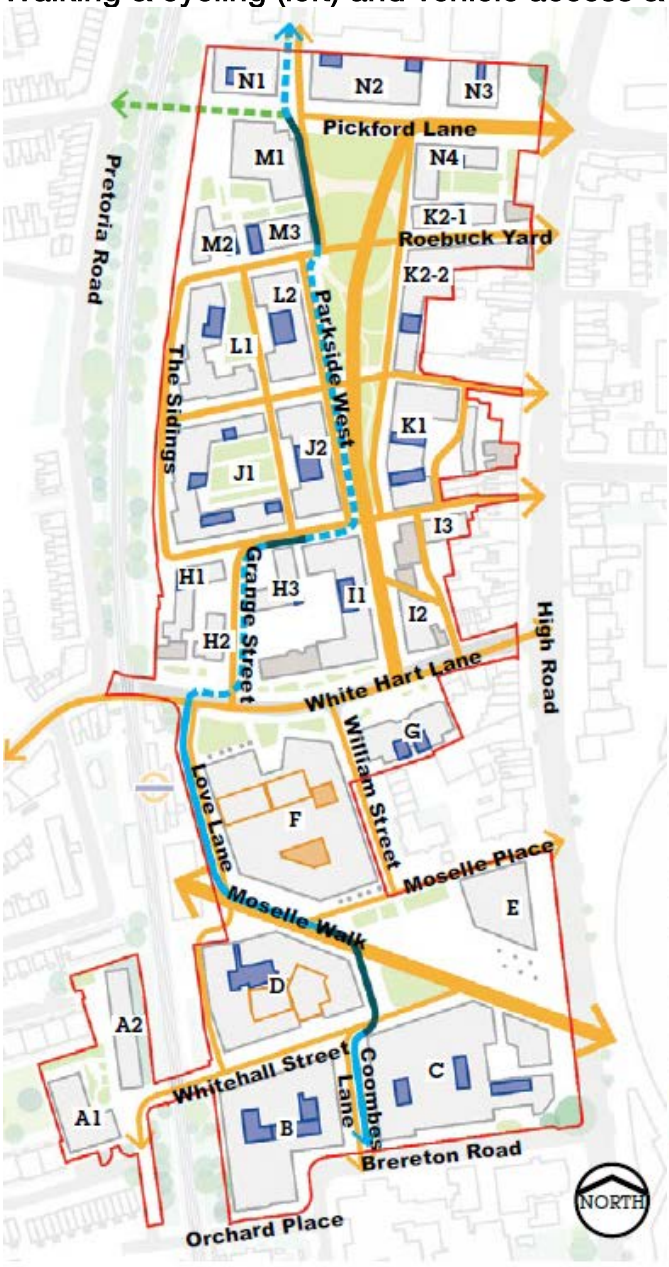


Fig.125 - Pedestrian and Cycle Movement and Parking

- Hybrid Planning Application Boundary
- Primary pedestrian route
- Secondary pedestrian route
- Cycle route along one-way vehicle route
- Cycle route along two-way vehicle route
- Cycle route through public realm
- Potential future pedestrian and cycle link
- Ground Floor Cycle Storage
- First Floor Cycle Storage
- Ground & First Floor Cycle Storage

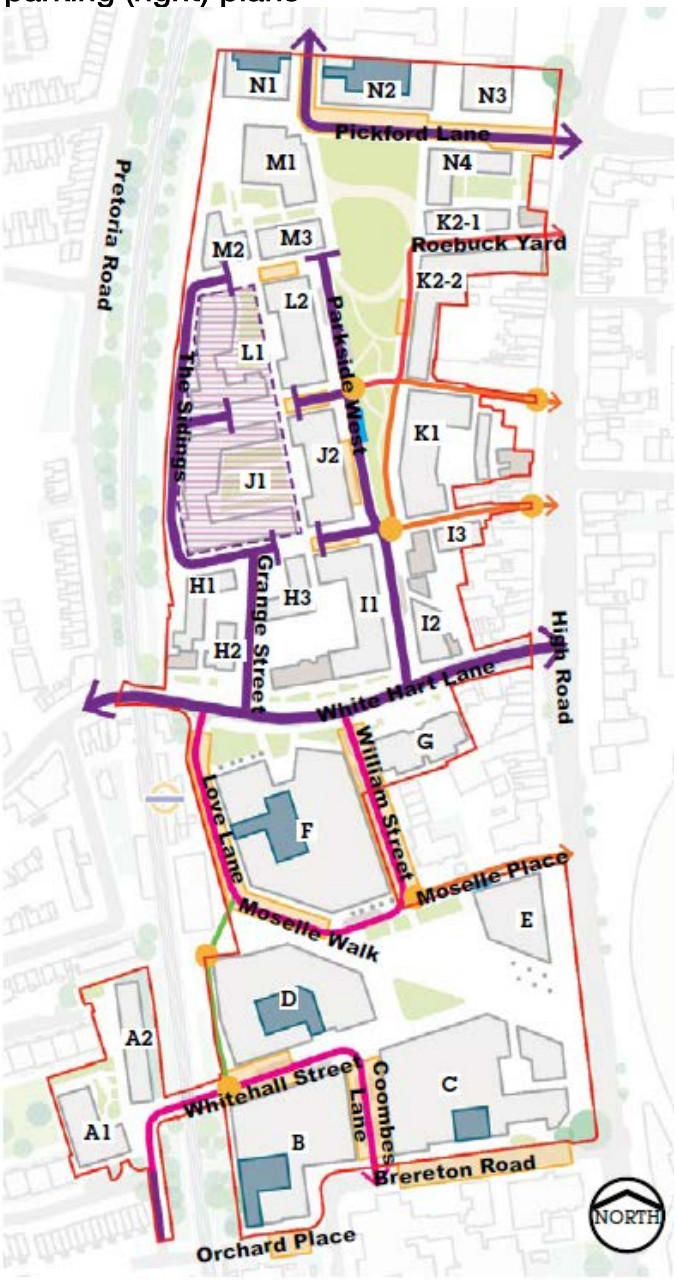


Fig.126 - Vehicle Access, Movement and Parking

- Hybrid Planning Application Boundary
- Two-way vehicle route
- One-way vehicle route
- Restricted access servicing route
- Restricted access lane
- Right of access route
- Right of access route
- On-street parking
- On-plot parking
- Basement parking
- Commercial parking space

Podium & roof strategy and play strategy





Example podium garden

Communal gardens will offer a range of spaces for everyone to use.

Every child will have direct access to play spaces within communal gardens or on low level roof gardens, away from match day movement.

Seating amongst planting



Growing space



Wildlife and nature gardens with informal play



Private amenity space



Doorstep play



Outdoor dining



Moselle Square functions and layouts



Neighbourhood space



Pop-up markets

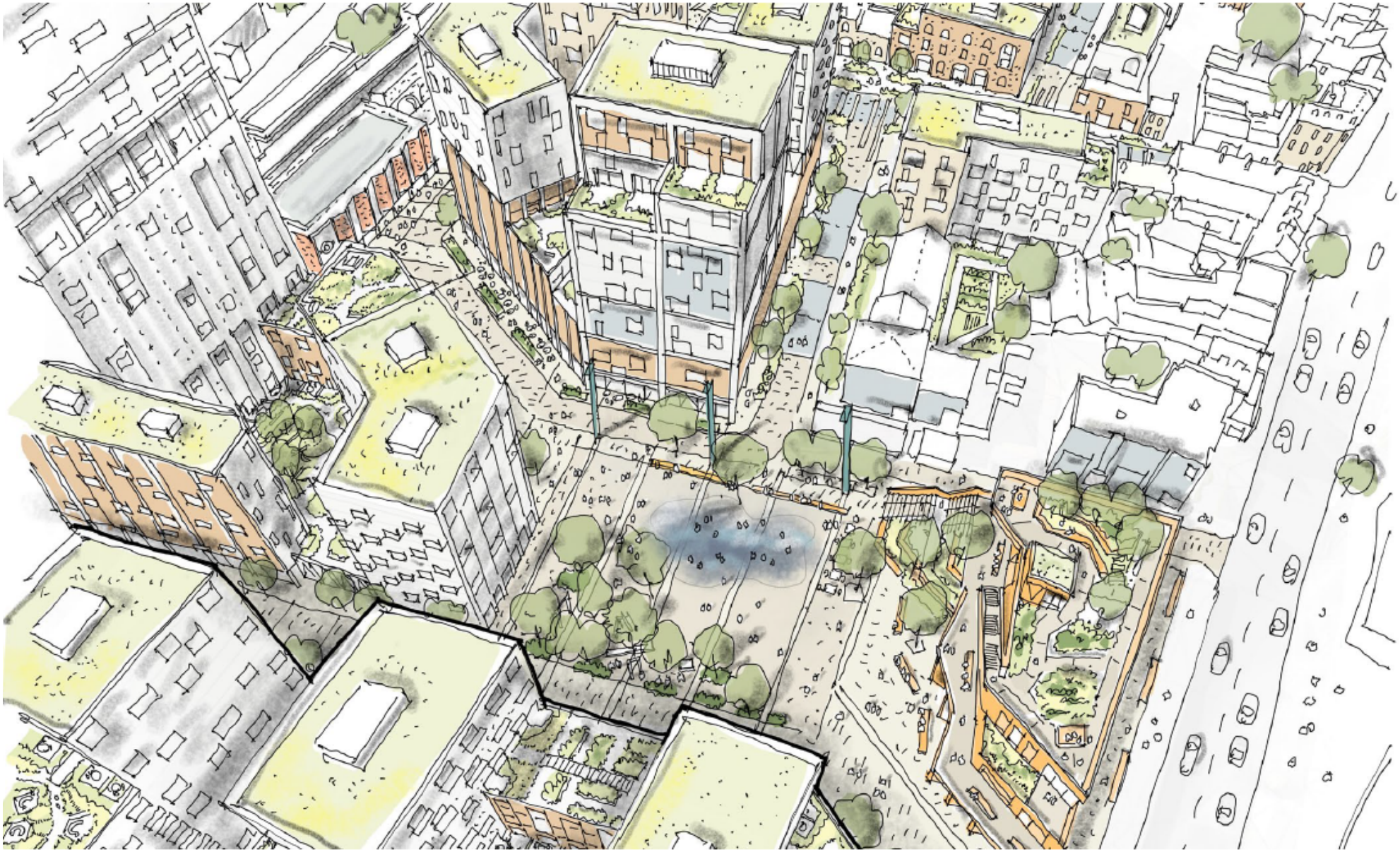


Community events



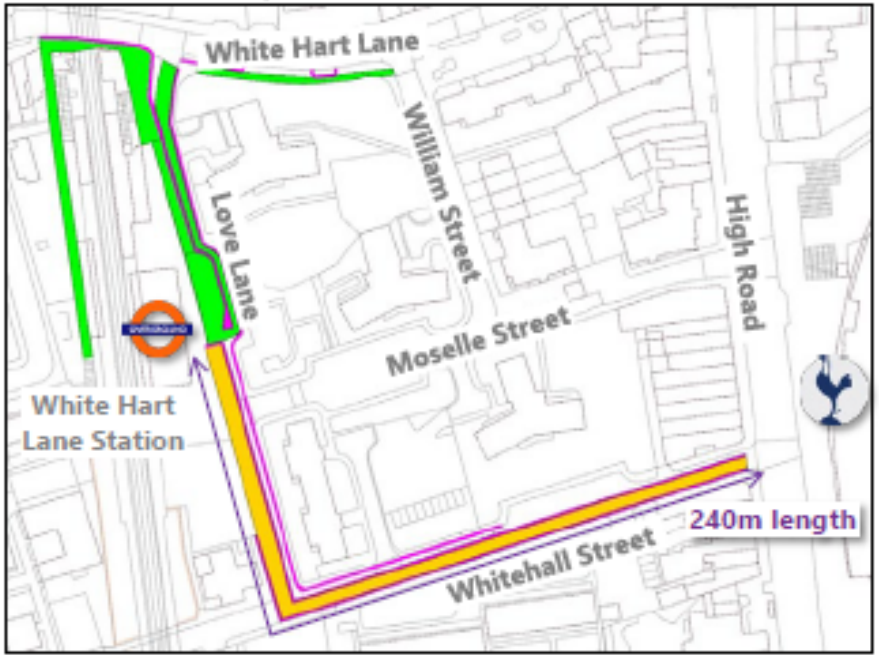
Match day

Moselle Square indicative layout



Current and proposed crowdflow arrangement

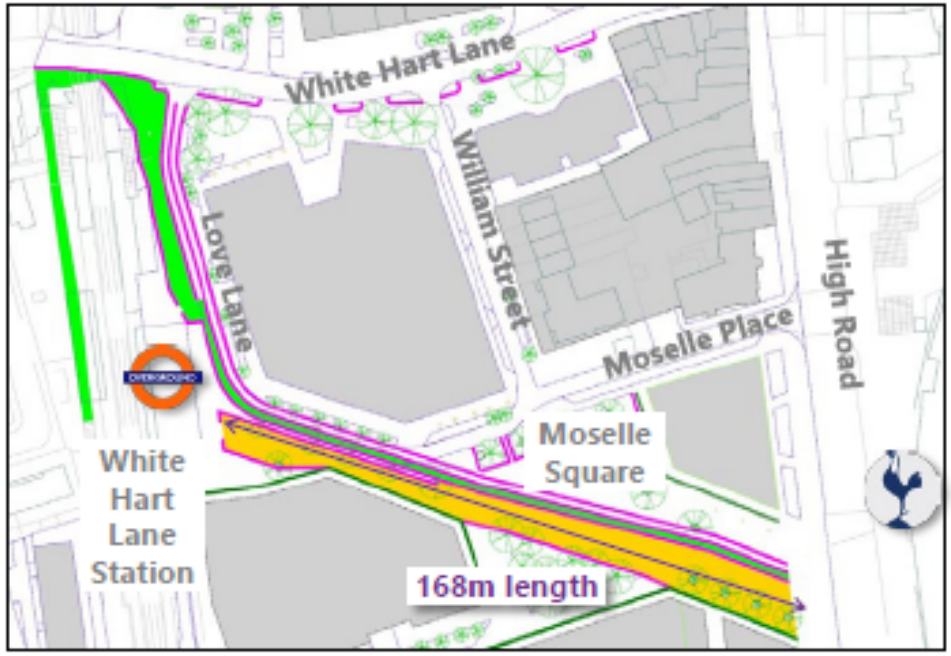
Current Scenario



Southbound queueing area 960m2

Northbound queueing area 1,225m2

Proposed Masterplan



Southbound queueing area 1,490m2

Northbound queueing area 1,140m2

Minor (7%) decrease area for Northbound – however, still sufficient space and there is flexibility to increase or revert to using White Hart Lane.

Crowdflow modelling through Moselle Square

CROWD FLOW STRATEGY - QUEUING STRATEGY

Flows towards southbound platform

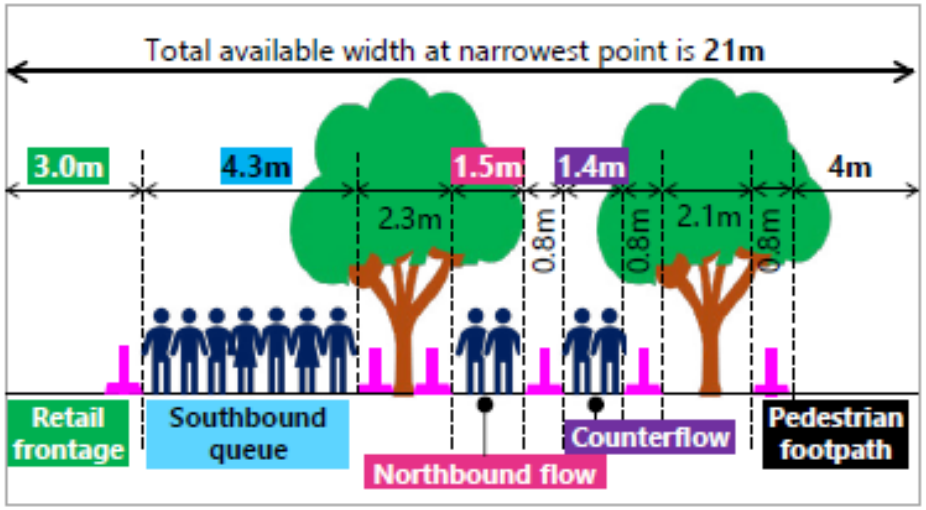
Flows towards northbound platform

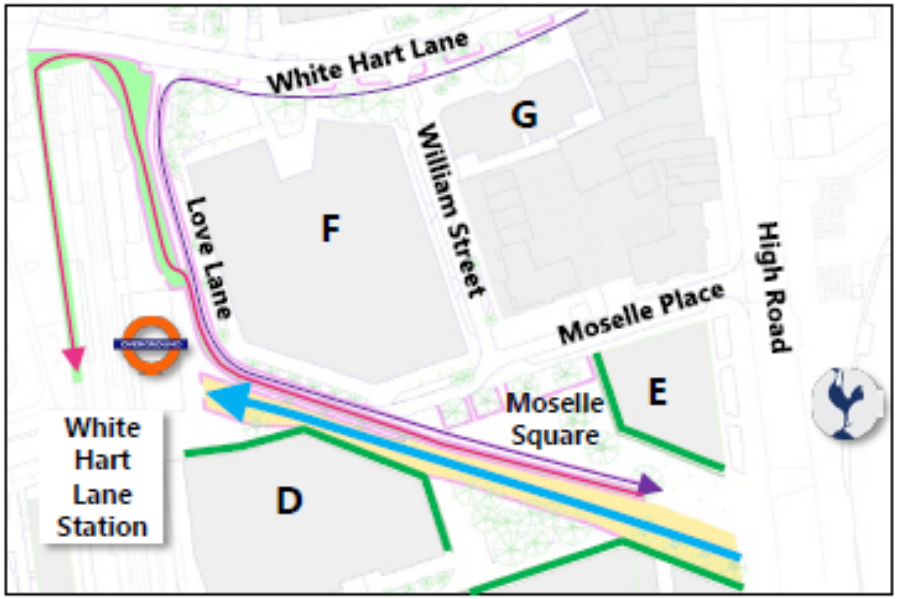
Counterflow lane

Southbound queuing space

Northbound queuing space

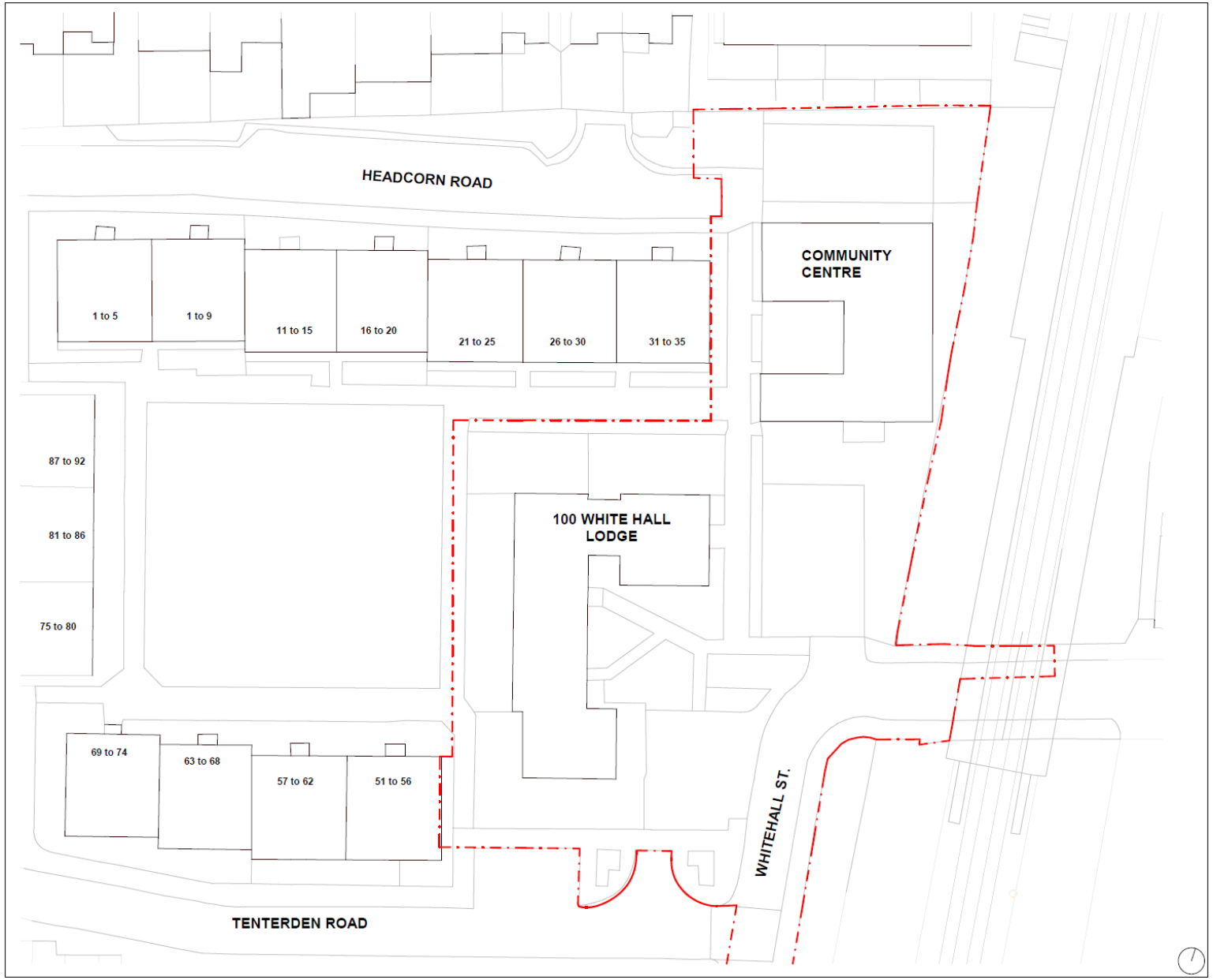
Retail frontage protected by barriers





The masterplan delivers a 120% increase in width at narrowest point

Detailed proposals – Plot A (Whitehall Mews) *Existing site plan*



Existing Plot A site condition



Viewpoint 01: Existing northern boundary wall adjacent to Penshurst Rd plots.



Viewpoint 02: Existing boundary and small trees to rear of Headcorn properties.



Viewpoint 03: Existing bin stores at Headcorn road.



Viewpoint 04: View from Whitehall Street. Extensive area of hard-standing used for existing community centre and vehicles.



Viewpoint 05: View down Headcorn Road showing existing parking bays and mature trees to rear.

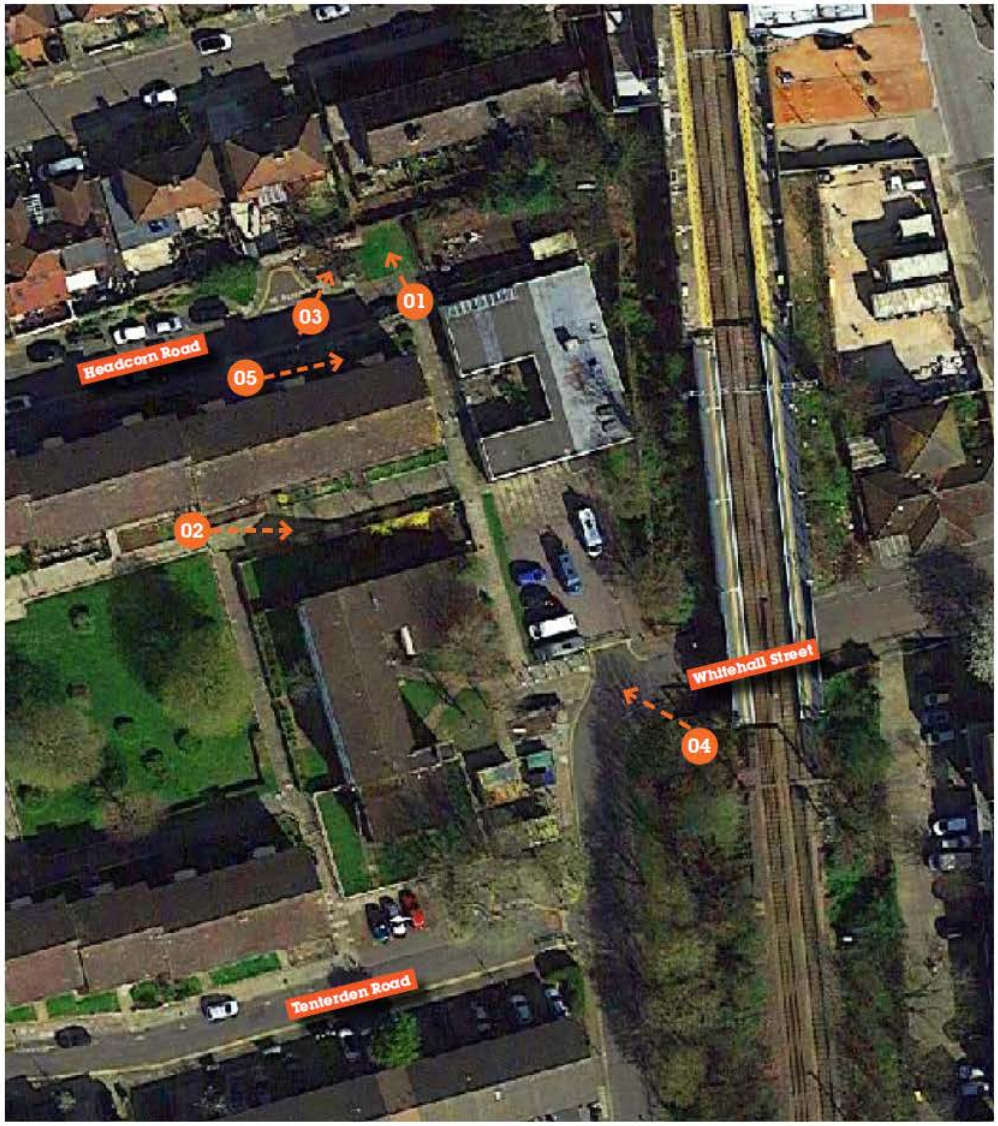
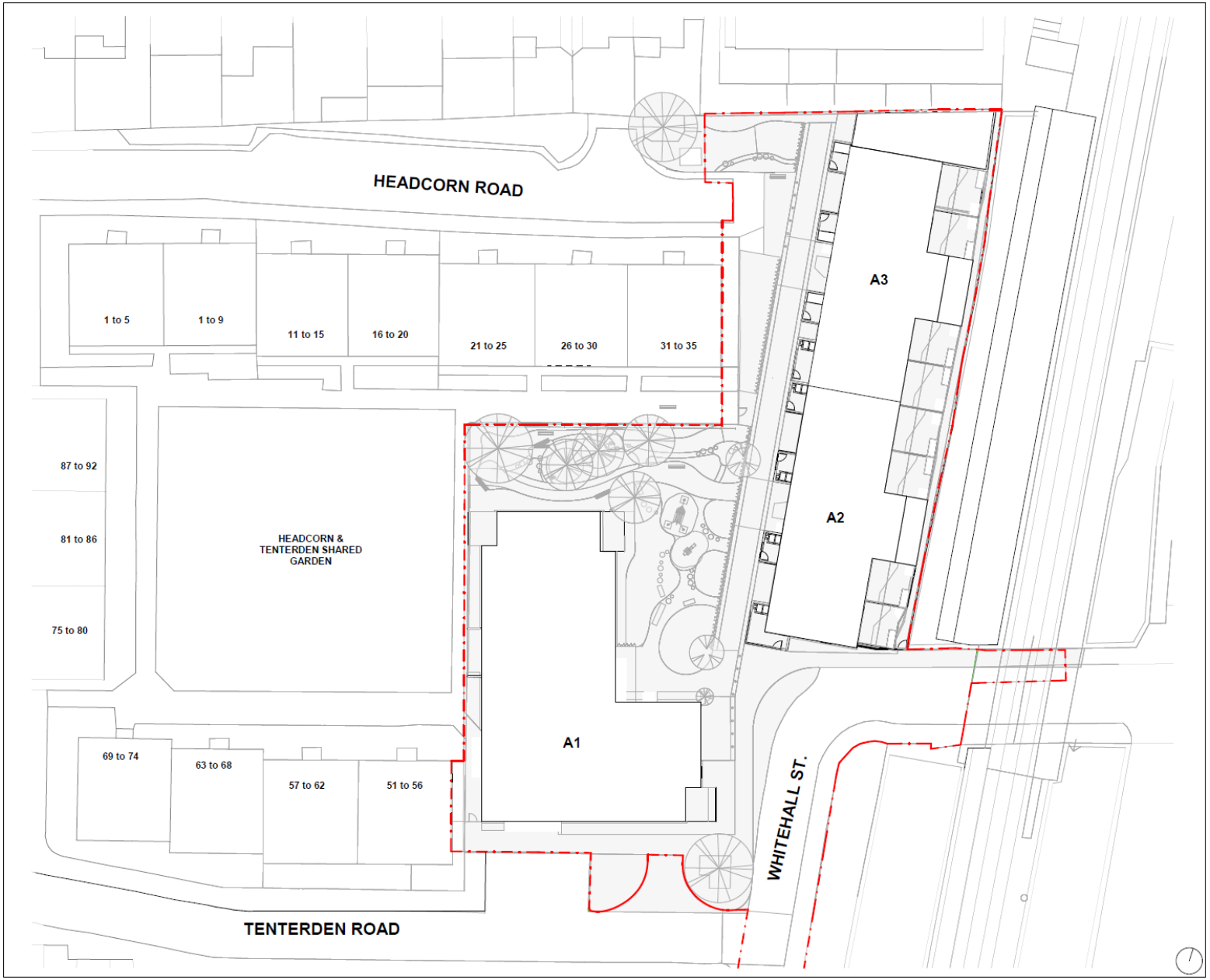
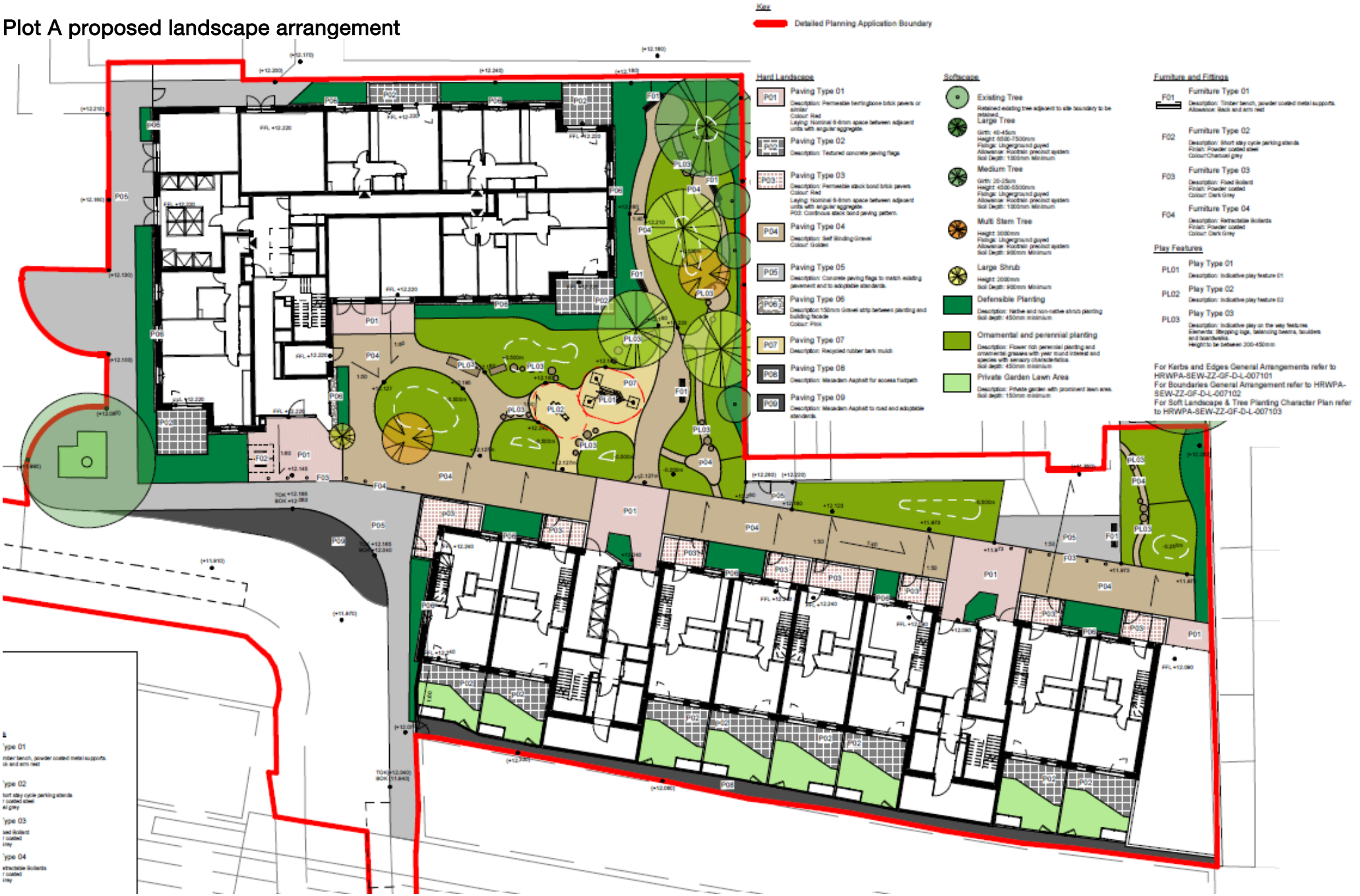


Fig: 1.4. Site Location Plan

Plot A proposed site plan



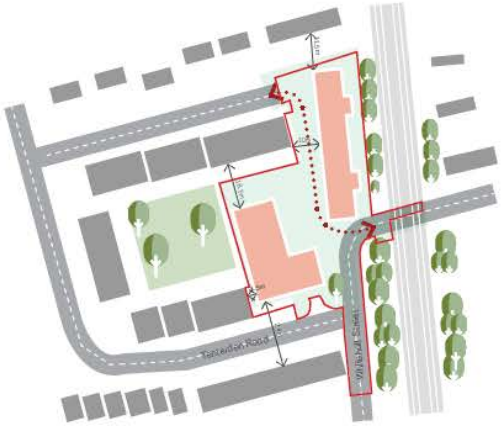
Plot A proposed landscape arrangement



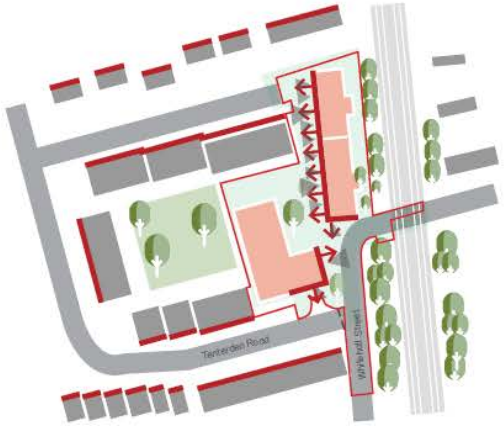
Plot A site strategies



Maintain existing pedestrian route through site



Maintain adjacencies to neighbours



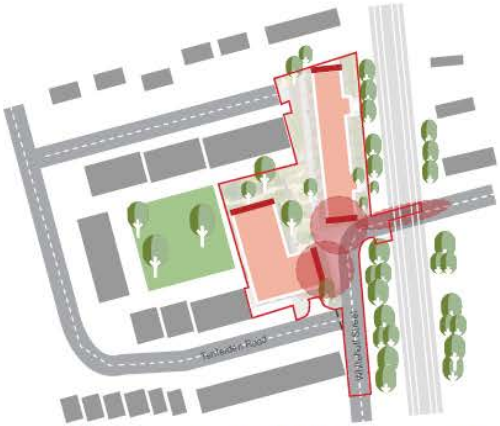
Entrances and activity along Whitehall Mews to create passive surveillance



High quality landscaping and security to Headcorn & Tenterden estate's shared garden



Car parking spaces off-site but close to homes



Gables and route under bridge frame entrance to Whitehall Mews



Window strategy to align with primary and secondary façades



Balconies and living rooms located away from railway line and at dual aspect corners

Plot A Massing

Whitehall Mews is formed of two buildings: an L-shape building (A1) and a rectilinear building (A2 and A3). A1 & A3 are 5 storeys and A2 is 6 storeys.

This massing view illustrates the buildings in relation to their context, namely the railway line, the homes on Tenterden Street and the Whitehall Street bridge.



Building A1 Ground Floor plan

The main communal entrance to Building A1 is located on the corner of Whitehall Street and Whitehall Mews, and is visible when approaching from the High Road via Whitehall Street, or when approaching from Whitehall Mews via Headcorn Road. This entrance leads residents to a generous secure postal lobby, followed by a centralised core with two lifts, only accessible to residents and visitors.

From the core, residents can access the refuse store via an internal lobby. Building A1's cycle store is located alongside the main entrance and is accessible via Whitehall Mews.

All the homes in the building are accessed via the core. Ground floor homes will have defensible planting focused along windows and terraces, whilst the central planting will be a softer mix of grasses, seasonal perennials, bulbs and structural shrubs.

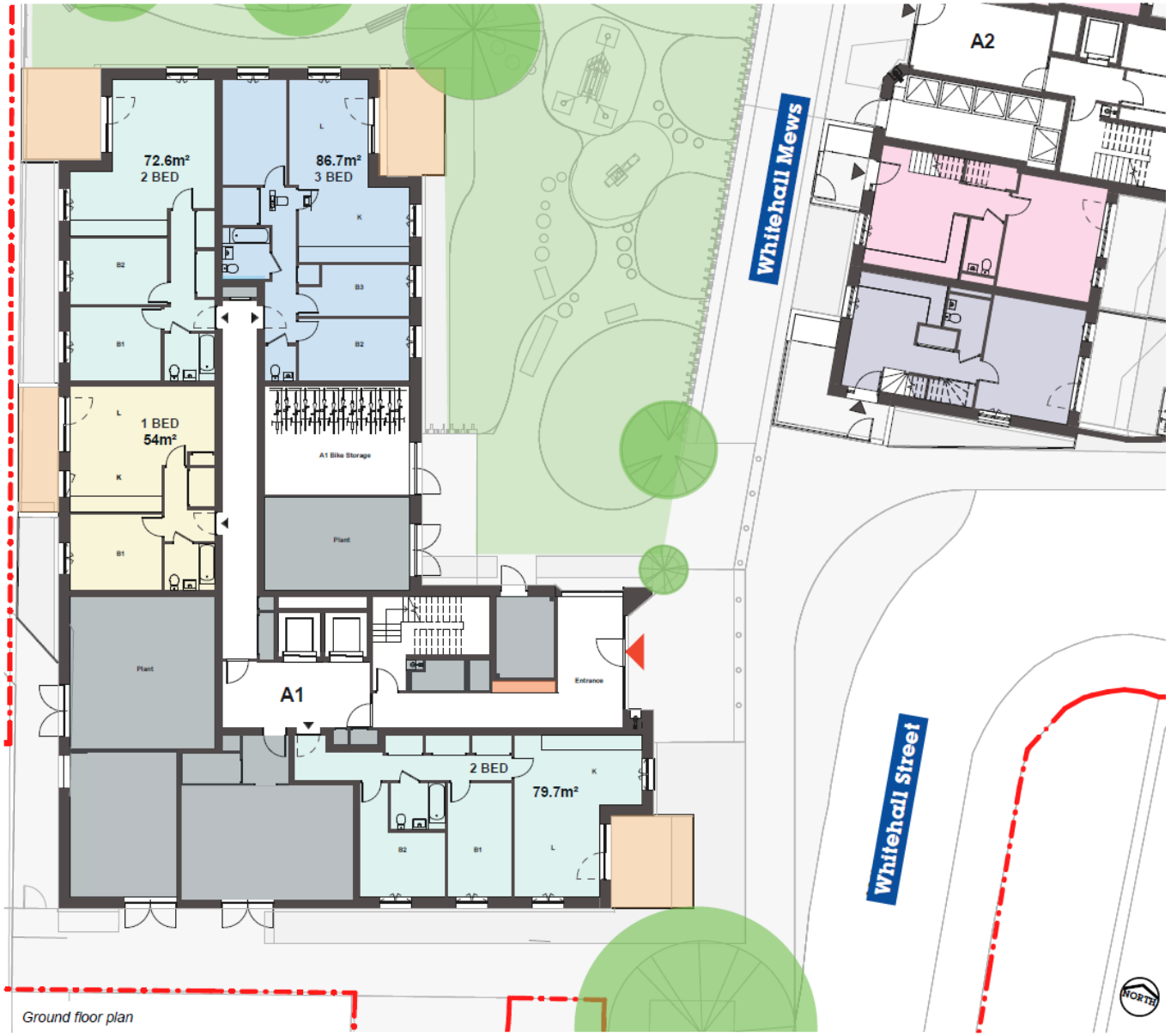
For further information about landscaping, refer to Section 5.

Key

- 1 Bed
- 2 Bed
- 3 Bed
- 3 Bed Duplex
- 4 Bed Duplex
- Private amenity space
- Communal areas
- Postboxes
- Ancillary
- Communal entrances
- Private entrances

Charter & Design Guide

- Option for separate kitchen.
- Mix of home types and sizes.
- Tenure blind.
- High quality public and communal space.
- Secure, properly lit, accessible entrances.
- Design encouraging natural surveillance.
- Medium rise buildings.
- Generous distances between buildings.
- Dual aspect homes
- Traditional materials/construction
- WFH / study facilities
- Windows to kitchens



Ground floor plan

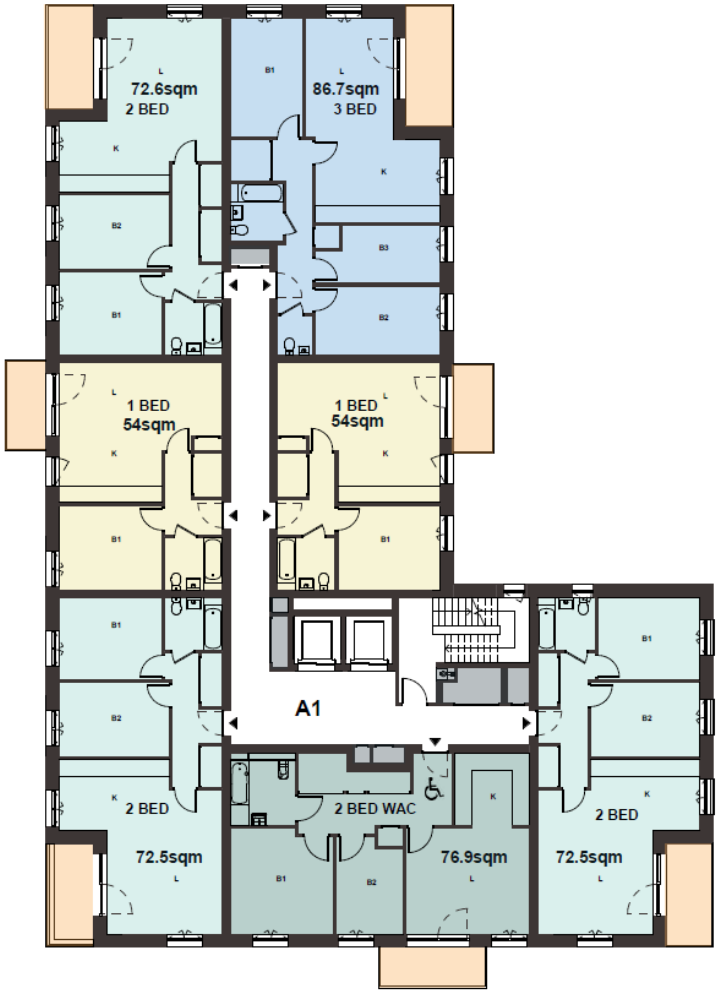
A1 upper floor plans

Charter & Design Guide

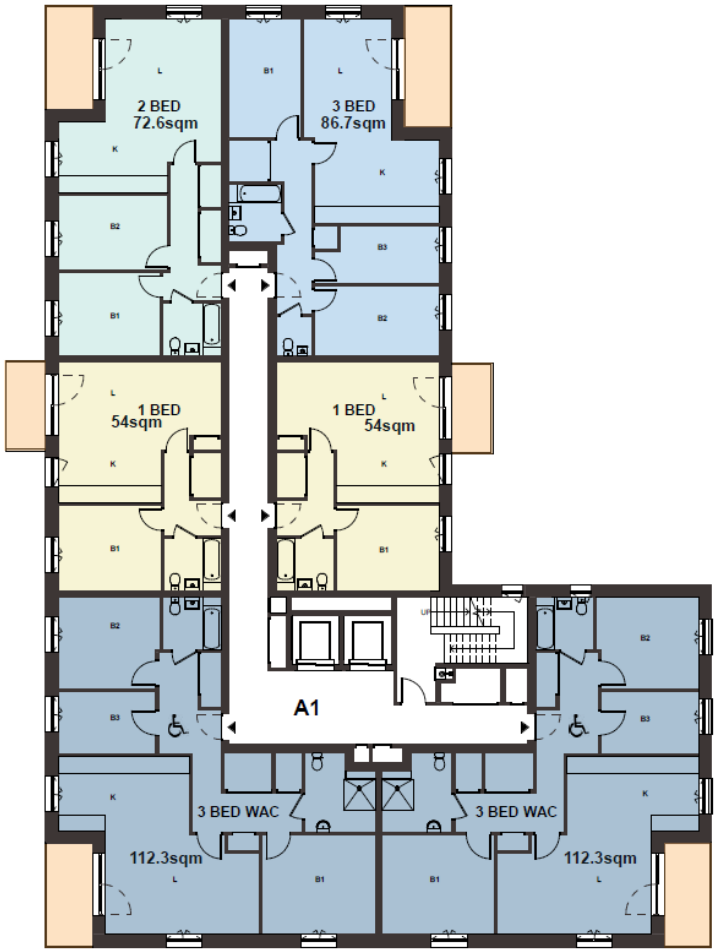
- Option for separate kitchen
- Mix of home types and sizes
- Tenure blind
- Design encouraging natural surveillance
- Medium rise buildings
- Dual aspect homes
- Traditional materials/construction
- Working from homes / study facilities
- Central core to minimise corridor lengths
- Windows to kitchens

Key

- 1 Bed
- 2 Bed
- 2 Bed WAC
- 3 Bed
- 3 Bed WAC
- 3 Bed Duplex
- 4 Bed Duplex
- Private amenity space
- Communal areas
- Postboxes
- Ancillary
- Private entrances



First - third floor plan



Fourth floor plan

A2 and A3 Ground and 1st Floor plans

Building A2 and A3's communal entrances are accessed from Whitehall Mews. Each building has ground floor duplexes facing and a communal entrance, with flats on the 2nd floor and above.

Within each communal entrance is a generous secure postal lobby, lift lobby and secure cycle store to the rear. The refuse store is located adjacent to the main entrance.

The duplexes are accessed via a gated front garden. All duplexes, face onto Whitehall Mews, except for the duplex to the South, whose entrance turns the corner and sits on the southern gable.

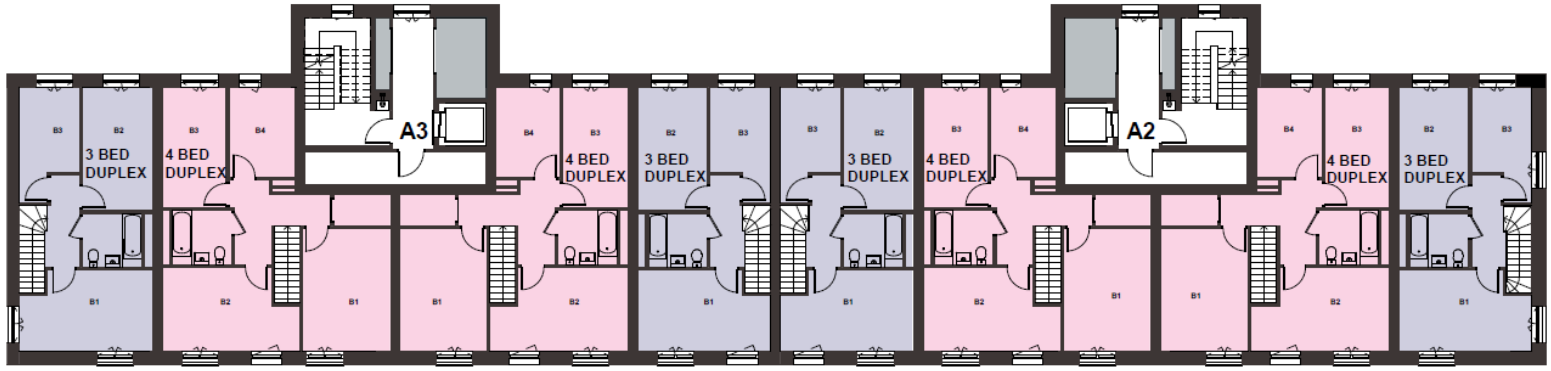
The clearly defined defensible boundaries will offer opportunities for social interactions with neighbours and residents passing through Whitehall Mews, in addition to passive surveillance. The rear gardens of buildings A2 & A3 will be secured using fencing, walls and trellises to define the private space for residents.

Charter & Design Guide

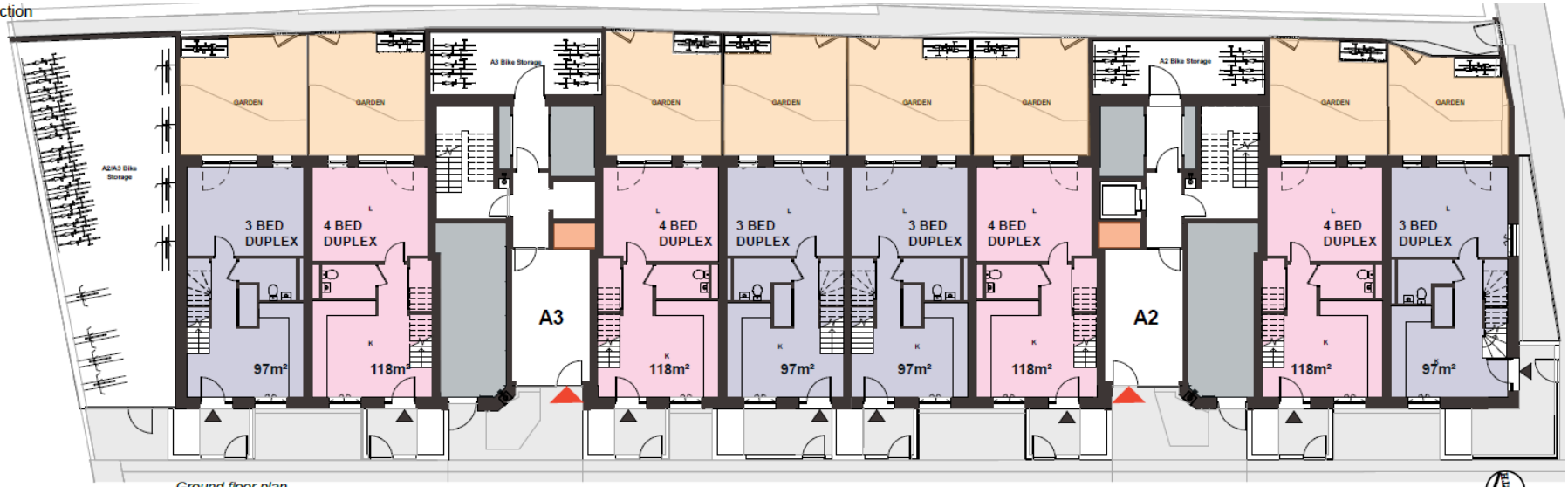
- Mix of home types and sizes
- Tenure blind
- High quality public and communal space
- Medium rise buildings
- Secure, properly lit, accessible entrances
- Design encouraging natural surveillance
- Dual aspect homes
- Traditional materials/construction
- WFH / study facilities
- Kitchens with windows

Key

- 1 Bed
- 2 Bed
- 3 Bed
- 3 Bed Duplex
- 4 Bed Duplex
- Private amenity space
- Communal areas
- Postboxes
- Ancillary
- Communal entrances
- Private entrances



First floor plan



Ground floor plan

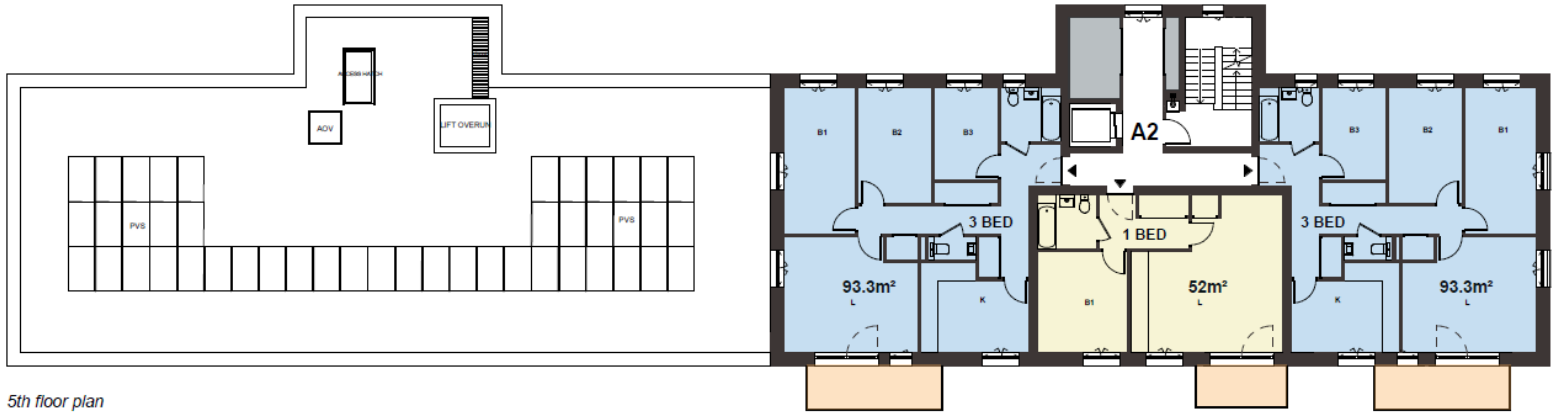
A2 and A3 Upper Floor plans

Charter & Design Guide

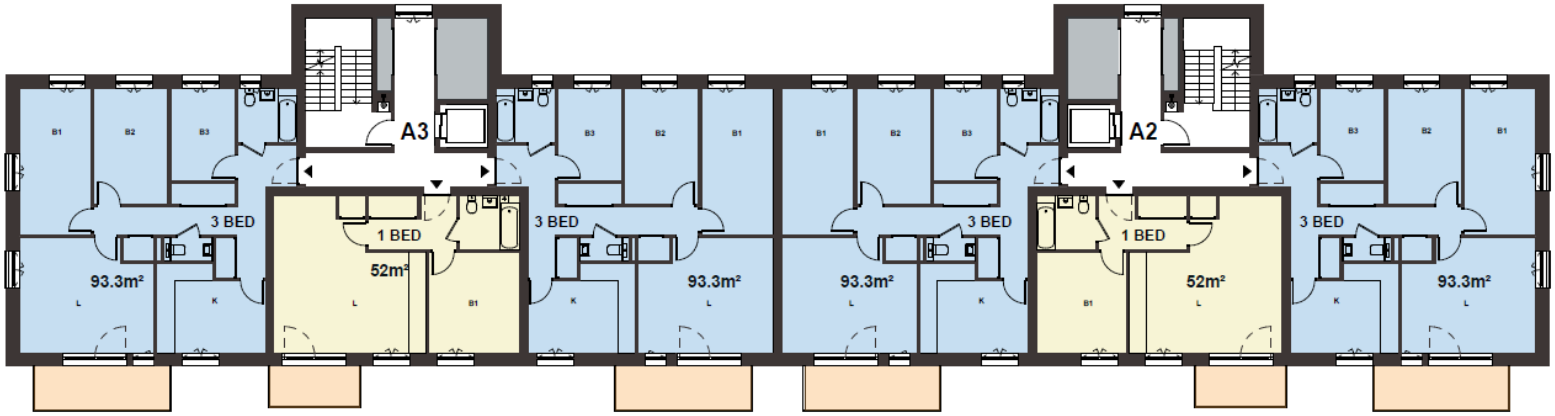
- Option for separate kitchen.
- Mix of home types and sizes.
- Tenure blind.
- Design encouraging natural surveillance.
- Medium rise buildings.
- Dual aspect homes
- Traditional materials/construction
- WFH / study facilities
- Central core to minimise corridor lengths.
- Windows to kitchens

Key

- 1 Bed
- 2 Bed
- 3 Bed
- 3 Bed Duplex
- 4 Bed Duplex
- Private amenity space
- Communal areas
- Postboxes
- Ancillary
- Communal entrances
- Private entrances



5th floor plan



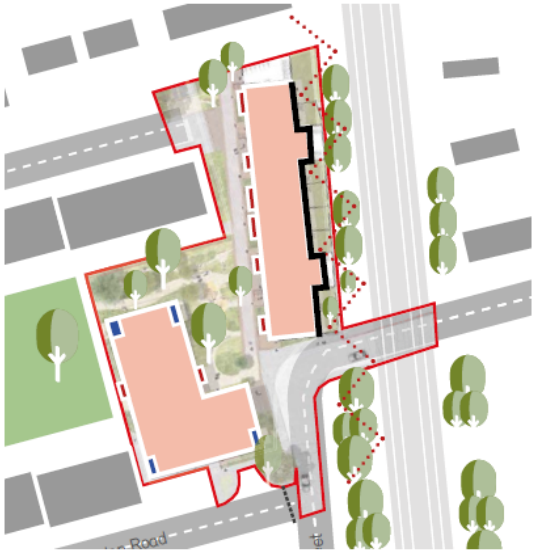
2nd - 4th floor plan

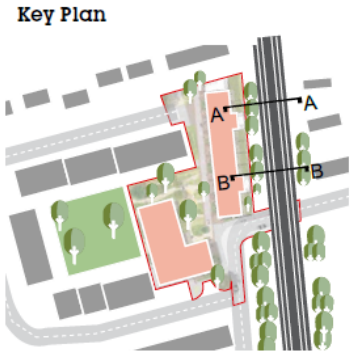
Plot A and the railway line to the east

Whitehall Mews is located adjacent to the raised railway line and platform for White Hart Lane Station.

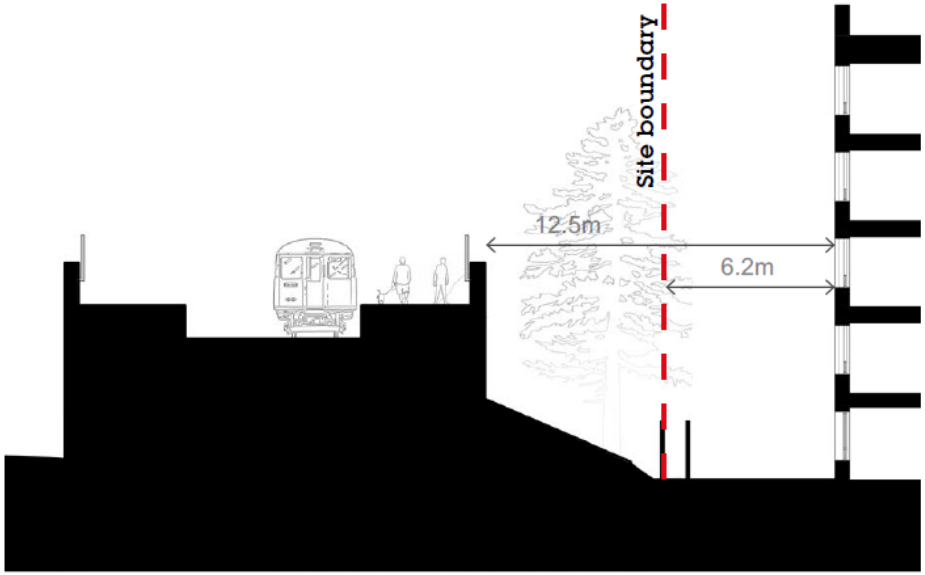
As described in the site strategies, living rooms and balconies on Buildings A2-A3 have been located away from the railway and platform, and instead face West onto Whitehall Mews.

Behind the duplex gardens a gap between the garden wall and the Network Rail boundary, in order for Network Rail to be able to maintain access to their boundary. This also forms part of the fire strategy as a secondary means of escape from the duplex rear gardens. This space will not be accessible to residents except as part of the emergency fire route. Refer to Chapter 4.8 Safety and Security for more information.

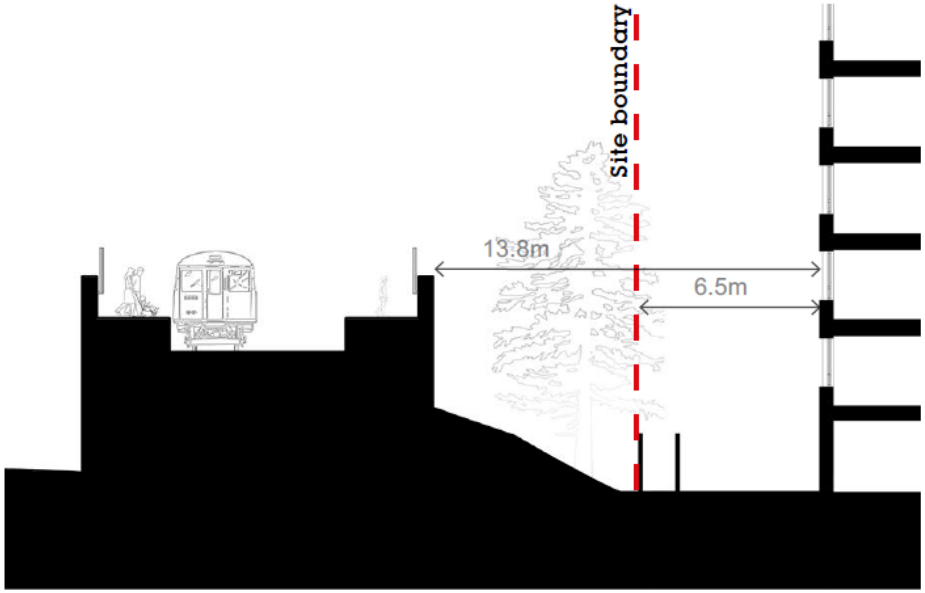




Balconies located away from railway line and at dual aspect corners



Section AA



Section BB

CGIs of Plot A – left looking west at development, and right showing an entranceway



Approach to main entrance from Whitehall Street



Building A2 and A3 communal entrance

View of Plot A from within Whitehall Mews looking southwest



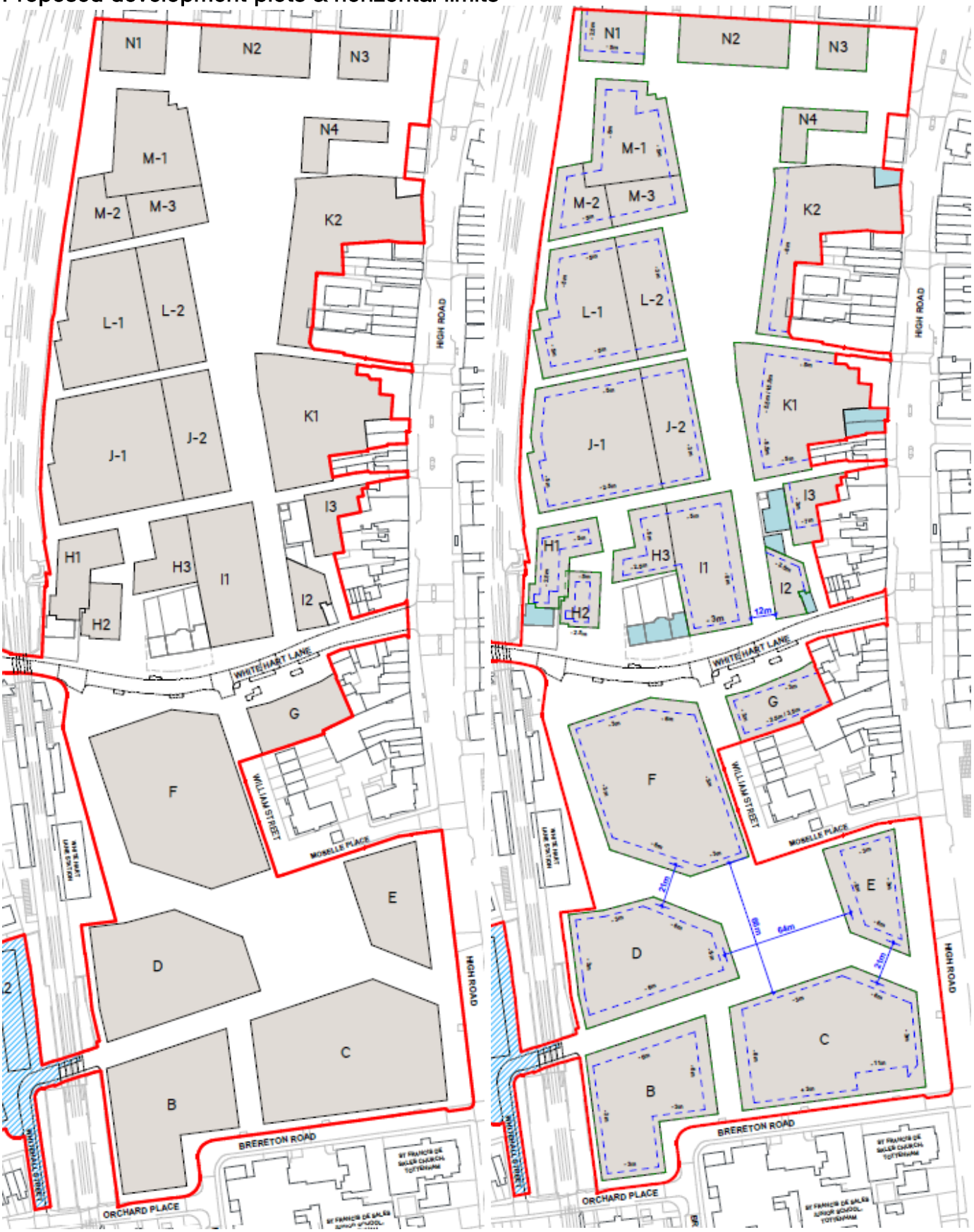
View of Block A3 looking east from Headcorn Road



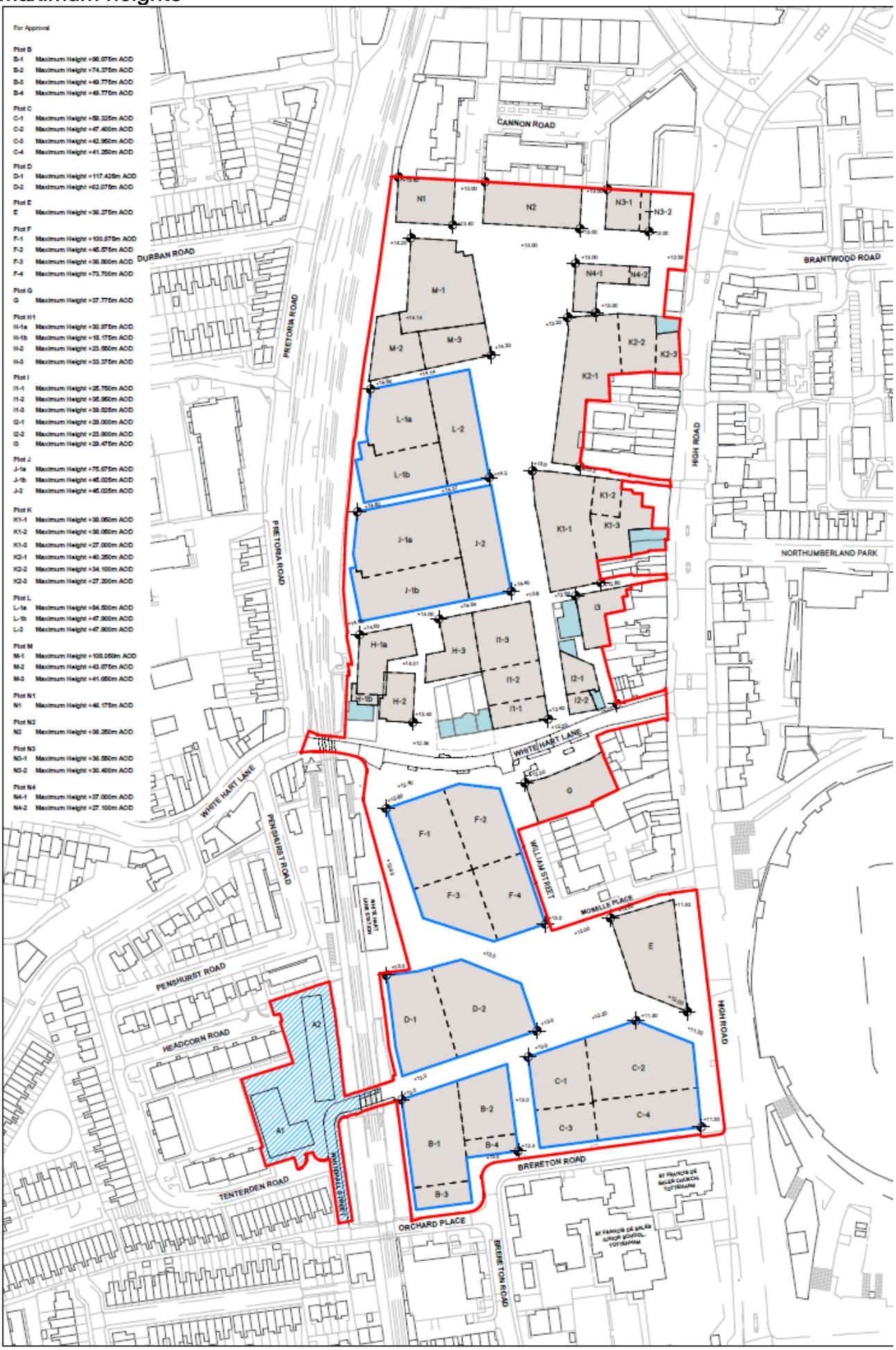
View of Plot A from White Hart Lane Station looking northwest



Outline Parameter plans
Proposed development plots & horizontal limits



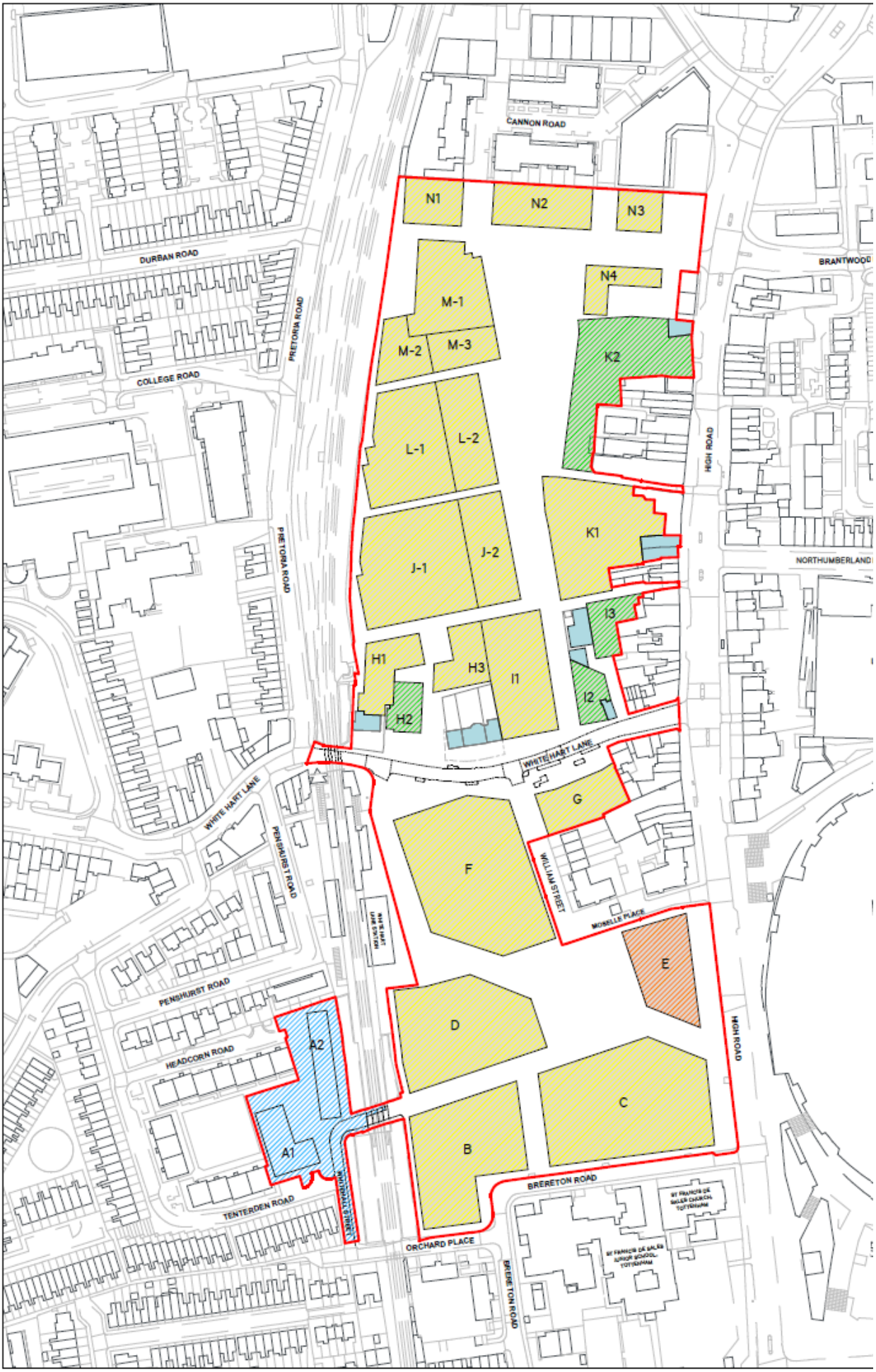
Maximum heights



Ground and first floor level land uses



2nd level & above land uses

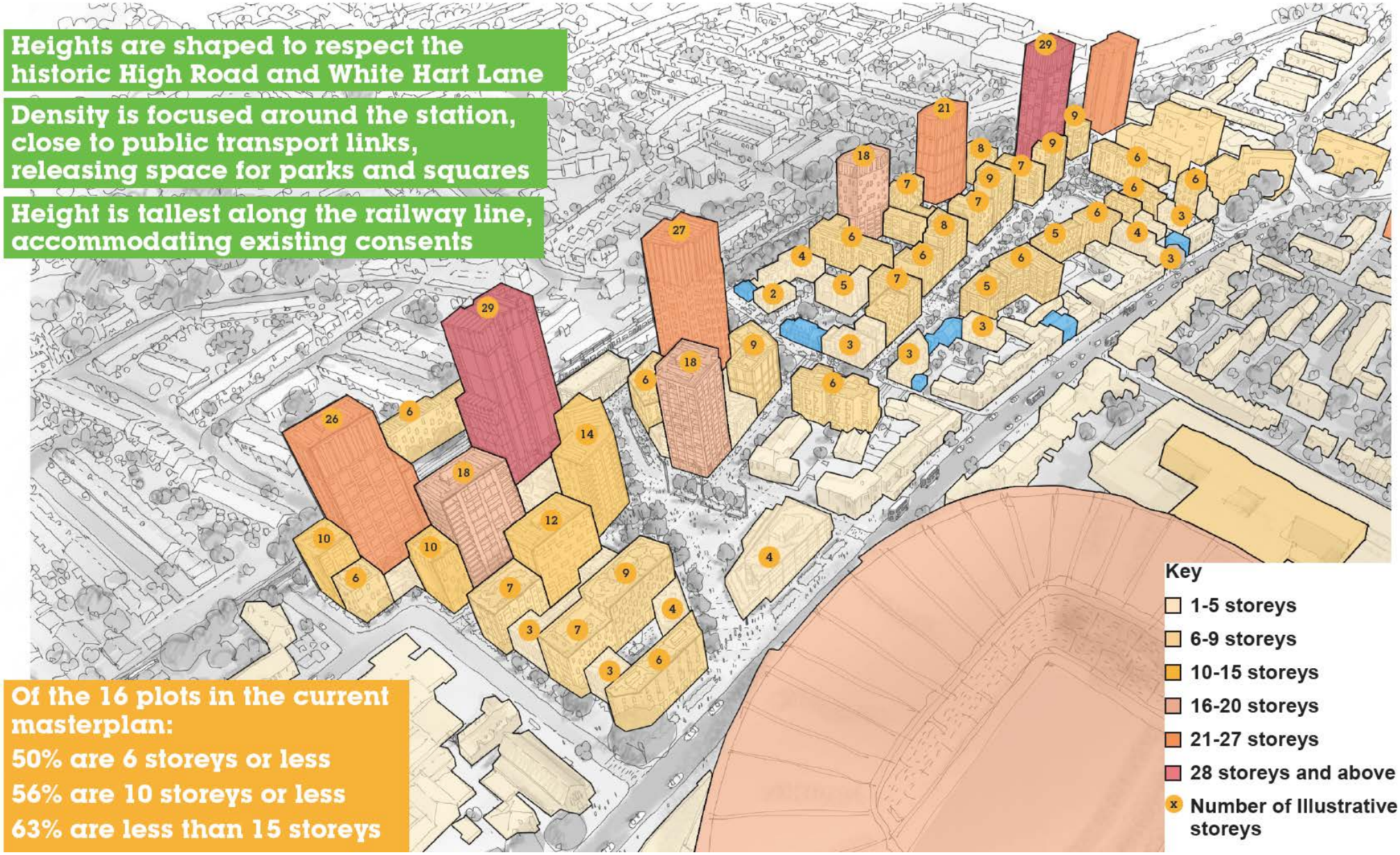


Sketch of illustrative masterplan



Fig-81 - Illustrative sketch of the HRW Masterplan

Building heights – Illustrative proposals



2.18 ARCHITECTURALAPPROACH

High Road West and the surrounding context of North Tottenham are characterised by the layers of historic development, creating a mixed vernacular and variety of styles.

Between the scheme's key landscape spaces and new streets a mix of buildings with unifying characters are introduced. The masterplan's varied urban forms mean development blocks often have to respond to contrasting constraints around their perimeter.

The Design Code explains how each block should be articulated and the Architectural Approach is focused on the creation of clusters of similar buildings around public spaces, aiming to bring a unity to each of the key landscape spaces within the masterplan. The diagram below shows how the individual buildings will be grouped into a series of 'Architectural Approaches'.

Each Architectural Approach complements the massing articulation guidelines to set out how each building will contribute to the identity of the new neighbourhood. Aspects of some Architectural Approach groups are covered in more detail in the Architectural Codes.

For further information on each Architectural Approach, please refer to the Design and Access Statement.



Fig: 32 Illustrative diagram showing the various Architectural Approach groups

- Heritage Architectural Approach
- Civic Architectural Approach
- Residential North Architectural Approach
- Residential South Architectural Approach
- Marker Building Architectural Approach
- Parkside Architectural Approach
- Mixed Use Architectural Approach
- Feature Building Architectural Approach (Plot D)
- Feature Building Architectural Approach (Plot E)

2.19 RHYTHM OF FAÇADES

Informing the design of façades across the masterplan. These codes are to be followed across all Architectural Approach groups unless overridden by a block code or group specific code.

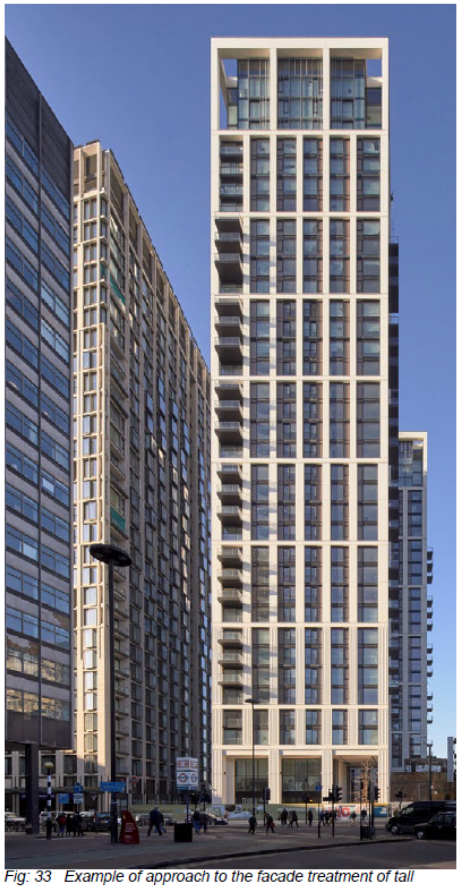


Fig: 33 Example of approach to the facade treatment of tall buildings. Southbank Place, London, Squire and Partners.

DESIGN GUIDELINES

2.19.1 Individual buildings across the blocks within an Architectural Approach group **should** share architectural features to create similarity between the different buildings unless otherwise specified.

2.19.2 A clear rhythm and hierarchy of windows related to the interior room use **should** be part of the facade design.

2.19.3 Larger windows **should** be focused on the corners to maximise daylight and aspect to living rooms.

2.19.4 Where there are podiums, the podium edges **should** be exposed and there should be a framework (either infilled or open) to provide a sense of enclosure around the podium.

2.19.5 Where ground floor duplex units are present, the facade **should** express the scale and individual nature of these homes.

2.19.6 On taller buildings a variation in the façade treatment or rhythm **should** be considered for the top storeys to create visual definition of the top floors in a suitable proportion to the massing.

2.19.7 Every façade of the taller buildings **should** be treated as a 'front' not a 'back' or 'side'. The tall buildings serve as landmarks from all sides, so each side **should** require equal design attention and provide both prospect and aspect.

2.19.8 On taller buildings, massing **should** be vertically articulated to amplify the verticality of the building.

2.19.9 On taller buildings, facade design **should** consider controlling building overheating issues and can adopt different strategies on different elevations especially on the southern and western elevations. The manipulation of composition of the building **should** be united by a consistent material approach.

Design Code example – Moselle Square Landscape approach

The following design codes enable a robustness & pragmatism required to serve a multifunctional civic space designed for the community. Specific performance requirements are to be addressed at detail design stage.

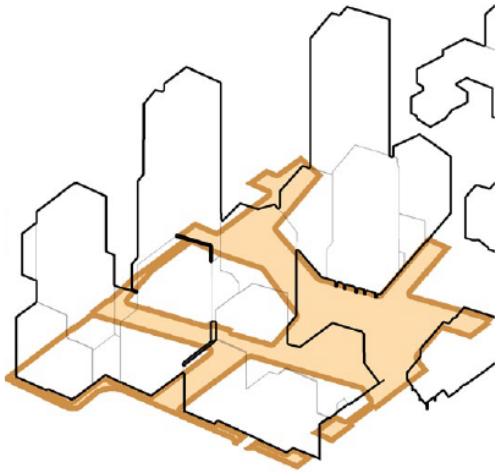


Fig: 74 Illustrative Location Diagram of Moselle Square Landscape Approach

DESIGN GUIDELINES

3.2.1 The square **must** contain a large open area of hardstanding designed to accommodate change, and be flexible for gatherings, events, markets and crowd management.

3.2.2 The square **must** be a welcoming civic space for the community.

3.2.3 The square **must** be designed from building edge to edge, and relating to land use.

3.2.4 The square **must** be inviting for children and older age groups through the provision of formal and/ or informal play.

3.2.5 The square **must** provide opportunities for resting and sitting, using trees, planting and street furniture to provide comfortable microclimates for different weather conditions.

3.2.6 The square **should** provide intimate green spaces for users to sit, watch, read & meet.

3.2.7 Trees and planting **must** be chosen to permit crowd paths. Specific details, including but not limited to species, heights, retaining edges, canopy structures and locations **must** be assessed and agreed at detail design stage.

3.2.8 Materials, raised edges, seating and street furniture **must** be designed to permit crowd paths.

3.2.9 Within the square designers **must** seek to integrate counter terrorism measures.

3.2.10 Within the square designers **should** use mature and specimen trees from the outset to create a more mature and robust environment.

3.2.11 Positioning of trees, signage and street furniture **must** allow for clear sightlines between the station and stadium for wayfinding purposes.

3.2.12 Roads connecting to the square **must** be designed on the basis of creating a 'pedestrian first' space. Specific details, including but not limited to flush and upstands to roads, bollards, visual contrast and signage must be coordinated with crowd path management, counter terrorism, and assessed and agreed at detail design stage.

3.2.13 Roads connecting the station forecourt with the square **should** be designed to slow vehicles; narrowed carriageways, surface material changes, minimal surface parking and a de-engineered vehicle route.

3.2.14



Fig: 73 Illustrative sketch view of Moselle Square (Illustrative)

Design Code example – Maximum parameter extents

The maximum parameter extents are defined by two Parameter Plans:

- **0311-SEW-ZZ-ZZ-DR-T-001003 - Parameter Plan 03 - Horizontal Limits of Deviations Plan**
- **0311-SEW-ZZ-ZZ-DR-T-001004 - Parameter Plan 04 - Building Heights Plan**

These plans outline the maximum and minimum horizontal development extents and maximum building heights, which in combination define the building envelopes. Future building footprints and massing must fit within the vertical and horizontal limits of deviation as defined by these parameters.

The flexible zones between the maximum and minimum horizontal limits, within which the building lines must be located, have been determined to allow for variables and flexibility within future RMAs.

The following pages provide design guidance to articulate the blocks within each plot as defined by the Parameter Plans. The diagram opposite illustrates one way in which to interpret these guidelines to deliver a comprehensive scheme across the site. The interpretative blocks shown are a illustrative tool to aid future designers to understand the guideline's intent in defining the blocks.

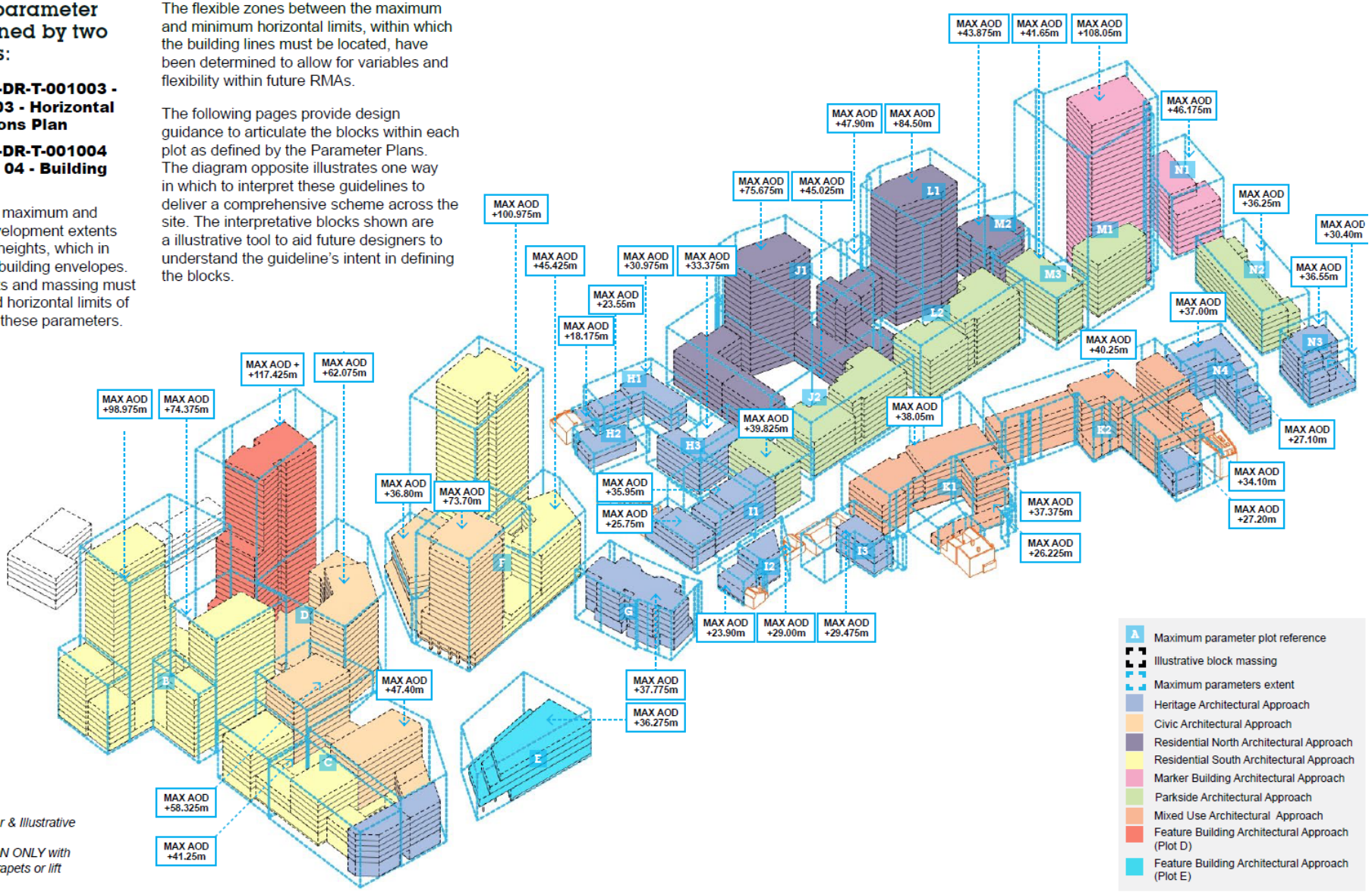


Fig: 103 Maximum Parameter & Illustrative Massing Overlay (FOR INFORMATION ONLY with no rooftop plant, parapets or lift overruns shown)

59

Design code example – Plot code design guidelines for Plots D and E

5.6 PLOT D

DESIGN GUIDELINES

5.6.1 Plot D **should** be arranged to allow for a podium level amenity garden.

5.6.2 Block D-1 **should** comprise volumes that present slimmer north south facing profiles.

5.6.3 Block D-1 must narrow along its north-south axis between base and top via at least 2 steps

5.6.4 Block D-2 **must** be aligned with the plot's eastern edge and comprise at least 1 step in volume with greatest height on the facade facing Moselle Square.

5.6.5 Blocks D-1 and D-2 **must** have a clear visual separation, represented as either:

a. A break between the buildings above the podium; or

b. A lower level linking volume to the northern boundary junction between the blocks.

5.6.6 Both Block D-1 and D2 **must** open to the south above the podium.

5.6.7 Building heights along Whitehall Street **must** be a minimum of 2 storeys.

5.6.8 Block D-1 **must** be treated as a Feature Building Architectural Approach.

5.6.9 Block D-2 **must** be treated as a Civic Architectural Approach.

These guidelines must be read in conjunction with the Site Wide Codes and Architecture Codes.

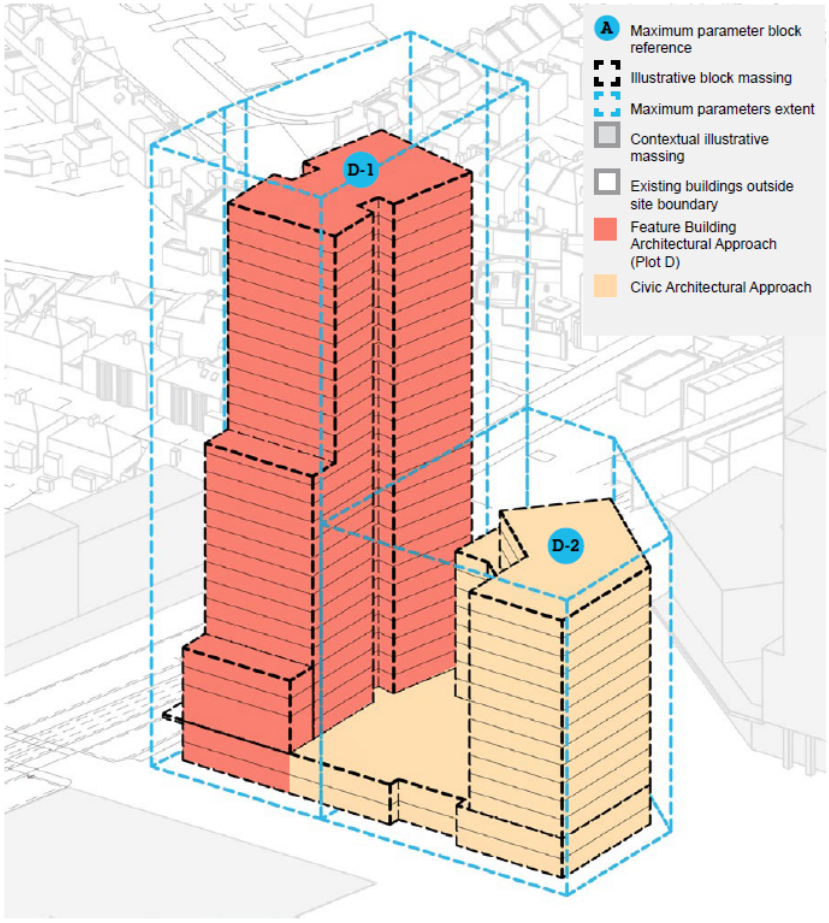


Fig: 115 Plot D Illustrative massing within maximum parameters (FOR INFORMATION ONLY with no rooftop plant, parapets or lift overruns shown)

5.7 PLOT E

DESIGN GUIDELINES

5.7.1 The Plot's ground floor **must** facilitate a clear line of site from Whitehall Street to High Road, while upper floors may project over this view corridor.

5.7.2 The block massing **should** comprise a sequence of volumes which step down to Moselle Square, providing west facing terraces, creating an accessible multi-tiered landscape.

5.7.3 The massing **should** further step to the south providing south facing terraces.

5.7.4 The Plot's Eastern frontage **must** align with the High Road frontage of Plot C to create a continuous building line.

5.7.5 Block E **must** be treated as a Feature Building Architectural Approach.

5.7.6 An architectural competition for a replacement Library and Learning Centre building **should** be used by future RMAs, based on a brief that has been the subject of meaningful consultation with local people and library/community centre users.

These guidelines must be read in conjunction with the Site Wide Codes and Architecture Codes.

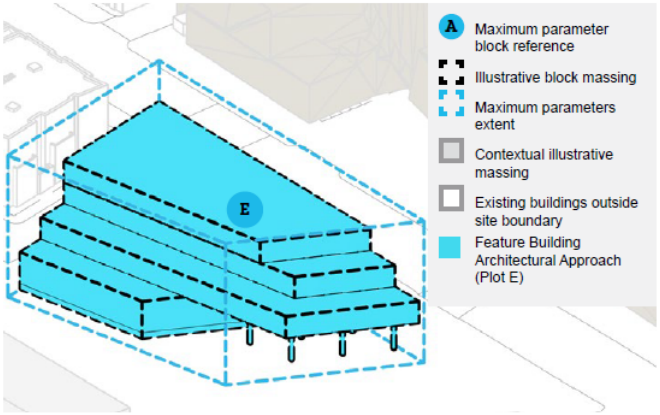


Fig: 116 Plot E Illustrative massing within maximum parameters (FOR INFORMATION ONLY with no rooftop plant, parapets or lift overruns shown)

Illustrative CGI view looking southeast towards High Road from Moselle Square at night-time



Illustrative CGI view looking southeast towards High Road from Moselle Square in the daytime



Illustrative CGI views looking west towards White Hart Lane Station



Illustrative CGI views looking from the stadium looking northwest on event day



Illustrative CGI view looking south from the northern end of Peacock Park



Illustrative CGI view looking east along White Hart Lane



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Appendix 2: Internal and External Consultee Representations

Stakeholder	Comment	Response
INTERNAL		
Arboricultural Officer	I hold, from an arboricultural point of view, no initial objections to the hybrid planning application yet to be fixed (excluding Plot A). The 8.57 hectare site is within the North Tottenham Conservation Area. An Arboricultural Impact Assessment and Tree Survey has been carried out by Waterman Infrastructure Limited dated October 2021. The report has been carried out to the British Standard 5837: 2012 Trees in Relation to Design Demolition, and Construction- Recommendations. I mostly concur with the findings of the report and the quality assessment and the categorisation of the trees on site. There are 134 trees in total: • Two category A • 61 category B • 66 category C 67 arboricultural features are proposed to be removed. Of these: • 27 category B • 39 category C It is proposed to plant 236 new trees. This is a 4:1 ratio for the loss of the above. A vast majority of these replacement trees will be suitable heavy standards to make an instant impact, and standards. This is to replace the loss, ensure increased future continuity of cover, and an opportunity for species diversity. An illustrative Landscape Plan titled Illustrative Landscape Masterplan has also been submitted. This shows the extent of the planting, throughout the site with new planting to the north where industrial estates, lacking trees and vegetation, currantly exist. The detailed proposals will require an Arboricultural Method Statement. Tree and root protection areas are not to be compromised for the trees to be retained. The fixed Landscape Plan will require specifications, and a species list. A five year aftercare plan will also be required to ensure independence in the landscape. London Plane trees T1, 3, 4, 5, 63, 64, and 65 are the largest trees on and adjacent to site. All are shown on the trees for retention map 0311-SEW-ZZ-DR- A- 001- 100 however, T1, 3, 4, 5, 63, 64, 65, 148, 147 have been left off the Illustratiive Landscape Masterplan.	Landscape and arboricultural conditions are proposed to be attached to the permission.

Stakeholder	Comment	Response
	The trees for retention map shows T64 Plane tree to be retained. However, the survey recommends removal. This appears to be a street tree already under management. Confirmation will be required.	
Building Control	The BiA submitted reflects the Planning Application and is outline in nature and as such a detailed BiA will be required for the scheme when the detailed application is submitted. The principles noted in the BiA and its format are correct, however more detail is required that is not currently available. The fire safety statement is also like the BiA, outline and lacks specific detail as that is not known at this stage. Everything noted in the statement is correct (very much states that it will comply with all the relevant codes), but without the detailed knowledge of each building, it is outline in nature and a detailed fire safety statement for each building should be requested with the detailed planning application.	Detailed BIA and Fire Safety Statements will be secured by planning condition.

Carbon Management Team	**Carbon Management Response 21/12/2021** In preparing this consultation response, we have reviewed: • Energy and Sustainability Statement (Parts 1-3) prepared by (dated October 2021) • Outline Whole Life Carbon Report, prepared by Buro Happold (dated October 2021) • Detailed Whole Life Carbon Report Plot A, prepared by Buro Happold (dated October 2021) • Outline Circular Economy Statement, prepared by Buro Happold (dated October 2021) • Detailed Circular Economy Statement, prepared by Buro Happold (dated October 2021) • GLA carbon emission reporting spreadsheet • Relevant supporting documents. 1. Summary The development achieves a reduction of 44% carbon dioxide emissions on site overall, which is supported in principle. This will be achieved primarily through a connection to the Decentralised Energy Network. The detailed element of the hybrid application (Plot A) is proposed to reduce emissions by 91% overall, which is supported in principle. However, this plot does not fully comply with Policy SI2(B), which will need to be addressed. It also does not comply with Policy SI4 as the overheating strategy is not acceptable. Some further information is requested in relation to the Whole Life Carbon Assessment and the energy strategy for the outline element. Appropriate planning conditions will be recommended once this information has been provided. 2. Energy – Overall Policy SP4 of the Local Plan Strategic Policies, requires all new development to be zero carbon (i.e. a 100% improvement beyond Part L (2013)). The London Plan (2021) further confirms this in Policy SI2. The overall predicted reduction in CO2 emissions for the development shows an improvement of approximately 44% in carbon emissions with SAP2012 carbon factors, from the Baseline development model (which is Part L 2013 compliant). This represents an annual saving of approximately 2,137 tonnes of CO2 from a baseline of 4,871 tCO2/year. London Plan Policy SI2 requires major development proposals to calculate and minimise unregulated carbon emissions, not covered by Building Regulations. The calculated unregulated emissions are: 7,052 tCO2 for the outline and detailed elements. The operational energy use requirement is calculated to be less than 43 kWh/m2 /year (including regulated and unregulated energy).	Planning conditions and planning obligations will be attached to the permission to secure the energy strategy, detailed carbon lifecycle assessment, boiler details, DEN details, carbon offsetting payments, Overheating assessment and mitigation, BREEAM accreditation, living roof details and management and details circular economy statement.

The ESS reports the reduction in emissions based on SAP10 carbon factors. SAP2012 carbon factors have been quoted below, in line with GLA guidance on carbon factors for sites connecting to a DEN.

	Residential (detailed)		Residential (outline)		Non-residential		Site-wide	
(SAP2012 emission factors)	tCO_2	%	tCO_2	%	tCO_2	%	tCO_2	%
Baseline emissions	40.1		3,789		1,042		4,871	
Be Lean savings	2.5	6%	371	10%	190	18%	563	12%
Be Clean savings	29.1	72%	1,293	34%	210	20%	1,532	32%
Be Green savings	4.8	12%	60	2%	13	1%	79	2%
Cumulative savings	36.3	91%	1,724	46%	413	40%	2,137	44%
Carbon shortfall to offset (tCO_2)	3.8		2,064		629		2,698	

Energy – Lean

Detailed: Plot A

The applicant has proposed a saving of 2.5 tCO2 in carbon emissions (6%) through improved energy efficiency standards in key elements of the build, based on SAP2012 carbon factors. This does not meet the minimum 10% reduction set in London Plan Policy SI2, so this is not in line with policy and must be addressed.

Outline

The applicant has proposed a saving of 371 tCO2 in carbon emissions (10%) for the residential and a saving of 190 tCO2 (18%) for the non-residential elements of the outline through improved energy efficiency standards, based on SAP2012 carbon factors. This meet the minimum 10% and 15% reduction respectively set in London Plan Policy SI2, so this is supported.

Overall The following u-values, g-values and air tightness are proposed:

Thermal bridging	Accredited Construction Details		
Low energy lighting	100%	LEDs	100 lm/W lamp 60 lm/W display
Heating system (efficiency / emitter)	Communal gas boilers (89.5%, SAP heat losses 1.05 – Be Lean only)	Communal gas boilers (89.5%, radiators, SAP heat losses 1.05 – Be Lean only)	FCUs supplied via heat interface from DEN Direct electric hot water (retail)
Cooling	TBC	None	VRF / split system, EER/SEER 4.5
Thermal mass	Low		
Space heating requirement	40.2 kWh/m^2/y (Block A1) 42.5 kWh/m^2/y (Block A2/3)		
Improvement from the target fabric energy efficiency (TFEE)	13% improvement		

Actions:
- The carbon reduction under Be Lean for Plot A should be increased to at least 10% with SAP 2012 carbon factors.
- What is the g-value for windows on Plot A?

Overheating is dealt with in more detail below.

Energy – Clean

The Be Clean strategy to connect to the DEN is generally acceptable.

Detailed

The applicant proposes a temporary arrangement for Plot A before it is connected to the DEN. This would include installing high-efficient communal gas boilers within a centralised plant room in Plot A. This includes the same inputs as under Be Lean.

Outline

The development will connect into the southern Energy Centre (EC), to enable a connection to the Energy from Waste heat from Edmonton.

A backup solution has been proposed for the southern EC in case the connection into the Meridian Water Heat Network is unfeasible. This would be powered by an air source heat pump district heating solution, based in the

northern EC for the wider High Road West site. The 3MW ASHPs would operate with a heat fraction of >90%, with 9.2 MW back-up gas boilers. The system would include external air coolers and a 50 m2 thermal store.

The applicant will need to demonstrate that they will provide the following details prior to the commencement of construction:
a) Buried pipe (dry and filled with nitrogen) to our specification from the GF plant room to a manhole at the boundary of their site and evidence of any obstructions in highway adjacent to connection point;
b) A good quality network within the building – 60/40 F&R, R, <50W/dwelling losses from the network – ideally to an agreed standard in the S106;
c) A clear plan for QA of the network post-design approval through to operation, based on CP1;
d) A clear commercial strategy identifying who will sell energy to residents and how prices/quality of service will be set.
Further comments from the Energy Infrastructure Manager will be included separately.

Energy – Green

As part of the Be Green carbon reductions, all new developments must achieve a minimum reduction of 20% from on-site renewable energy generation to comply with Policy SP4.
The application has reviewed the installation of various renewable technologies. The report concludes that solar photovoltaic (PV) panels are the most viable options to deliver the Be Green requirement. A total of 79 tCO2 (2%) reduction of emissions are proposed under Be Green measures.

Detailed
The solar photovoltaic array peak output would be circa 36 kWp, which is estimated to produce around 18,000 kWh/year of renewable electricity per year, equivalent to a reduction of 4.8 tCO2/year.

Outline
The estimated solar photovoltaic array peak output is modelled at 1,274 kWp, with an annual generation of 955,739 kWh/year.
Actions:

- How will the solar energy be used on site (before surplus is exported onto the grid)? Will this feed into the centralised plant room and communal areas? Is there an option to provide the benefit equally to residents?

Energy –Seen

Detailed
The estimated energy demand for Plot A is 204,243 kWh/year for electricity and 258,888 kwh/year for the district heating. The development will have smart meters installed per dwelling.
3. Carbon Offset Contribution

A carbon shortfall of 2,698 tCO2/year remains, based on the development connecting to the DEN. The remaining carbon emissions will need to be offset at £95/tCO2 over 30 years.

A deferred carbon offset contribution mechanism will apply to this scheme as it is expected to connect to the DEN when this has been built.

The applicant should present two carbon reduction table scenarios:

- Scenario 1: Connection to the DEN scenario (residual tCO2 over 30 years)
- Scenario 2: Communal heating and gas boilers (residual tCO2 over 30 years)

Two carbon offset payments will be calculated. The carbon offset contribution for scenario 1 will be due at the commencement of development and the difference in the offset contribution between the first and second scenarios will be deferred for 10 years and indexed accordingly.

1. Payment for the residual emissions in the DEN scenario (Scenario 1) would be due at commencement of development.
2. A deferred carbon offset contribution is calculated through the difference in the offset contribution: Scenario 2 – Scenario 1 = Deferred Payment.
3. If, after 10 years the development has not connected to the DEN, the deferred payment (+indexation) is due.
4. If, after 10 years the development has connected to the DEN, the deferred payment would not be due but this amount would be available as a connection charge to the DEN.

	Base Carbon Offsetting Contribution (Communal gas boiler scenario; tCO_2)		Carbon Offsetting Contribution (Connecting to DEN scenario; tCO_2)	
	Residential	Non-residential	Residential	Non-residential
Baseline				
Total cumulative savings per annum (tCO_2, %)	(%)	(%)	(%)	(%)
Shortfall to offset	X1	Y1	X2	Y2
Carbon offset payment due for scenario	(X1+Y1) x 30 x £95 = £A		(X2+Y2) x 30 x £95 = £B	
Carbon Offsetting Contribution payment due at commencement of development			£B	
Deferred Carbon Offsetting Contribution (+indexation) payment due if not connecting to the DEN			£A - £B = £C	

4. Overheating
London Plan Policy SI4 requires developments to minimise adverse impacts on the urban heat island, reduce the potential for overheating and reduce reliance on air conditioning systems. Through careful design, layout, orientation, materials and incorporation of green infrastructure, designs must reduce overheating in line with the Cooling Hierarchy.

Detailed Overheating Assessment Plot A
In accordance with the Energy Assessment Guidance, the applicant has undertaken a dynamic thermal modelling assessment in line with CIBSE TM59 with TM49 weather files, and the cooling hierarchy has been followed in the design. The Overheating Report prepared by Aecom (dated October 2021) is contained in the ESS.

Overheating Commentary and Actions:

Weather centre

- As outlined during pre-application discussions, the model needs to be redone with London Weather Centre data (not Heathrow) to represent the urban heat island effect. Further justification was also included in the emails dated 29th October, demonstrating that Tottenham (and this area in particular) suffers from 'high heat risk', which is the highest level of risk, on the GLA Climate Risk Metrics map (screenshot added below – ref Image 1). In addition:
o The proposed development and forthcoming development surrounding this site will cumulatively worsen the urban heat island effect, strengthening the need to undertake modelling with the London Weather Centre file.
o The site is in a unique position with noise/air pollution impacts from surrounding uses. The stadium is an additional contributor to noise, and with the stadium events being increased, this impact will be greater for local residents. This means the newhomes in this area must be built to address of concerns of noise (amongst other issues).
o This site will accommodate affordable housing. Occupants in affordable housing are more likely to be vulnerable in terms of their physical or mental health and wellbeing, may be restricted in their ability to leave their home during heatwaves, and may go into coolth poverty due to the need to install expensive cooling solutions. As such, it is even more important that such future occupants are protected from the overheating risks so that their homes will support them and not make their living situation worse.

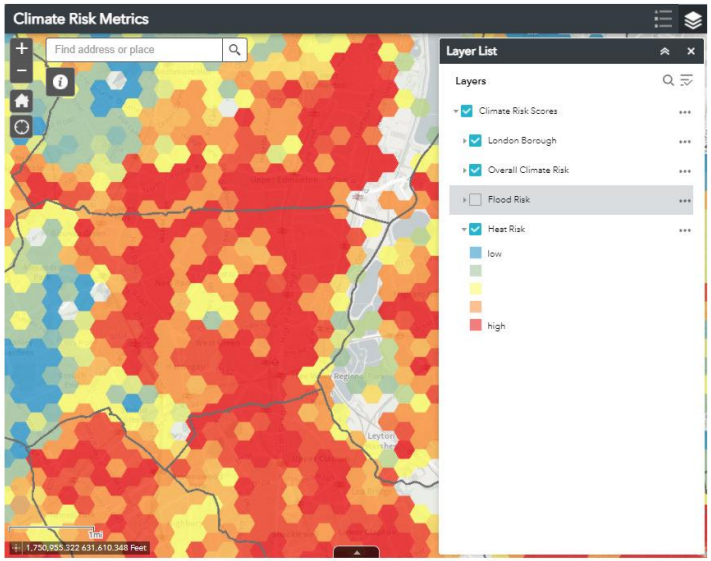


Image 1: GLA Heat Risk Map for Tottenham Haringey (dark red is highest risk)

Modelling further weather files

- The applicant has not modelled DSY 2 or 3 (2020s) or DSY1 (2050s and 2080s) for the development. Please also model these and ensure the design has incorporated as many mitigation measures to pass DSY 2 and 3 as feasible. These files should be used to inform what mitigation measures should form part of the retrofit plan to reduce future overheating risk, demonstrating that these measures can theoretically be accommodated within the current design in terms of structure/space requirements. This retrofit plan should be included within the submission. This is in line with the approach taken for the northern part of High Road West.

Additional modelling of dwellings
- The report has modelled 6 dwellings (10% of total apartments), under the London Heathrow files (this should be London Weather Centre). No rooms were modelled in Blocks A1 or A3, which is not considered acceptable. The applicant even notes in their report that further spaces should be modelled.

- Additional modelling should take place for representative dwellings in Blocks A1 and A3. Whilst it is acknowledged that dwellings in Block A2 may represent the 'worst case' in terms of noise levels, the other dwellings may not need noise attenuation/mitigation and therefore will require a different overheating strategy.

o Please model the following most likely to overheat rooms in these blocks:
At least 15% of all rooms across the development site;
All single-aspect dwellings facing west, east, and south;
At least 50% of rooms on the top floor;

	75% of all modelled rooms will face South or South/western facing; Rooms closest to any significant noise and / or air pollution source or on the ground floor, with windows closed at all times (unless they do not need to be opened and confirmed in the Noise and the Air Quality Assessments). - Include further modelling of the corridor in Block A3. Showing location of modelled spaces - The assessment doesn't show any floorplans annotating which flats and corridors have been modelled, nor does it specify why the 6 flats have been chosen. It's hard to tell from the 3D images. The applicant noted during pre-application discussions that this would be addressed in the report submitted in the planning application, in addition to further rationale for which dwellings were chosen. Principle of natural vs mechanical ventilation for modelling - Due to the noise constraints of this site being adjacent to the railway line, the TM59 criteria for predominantly mechanically ventilated dwellings apply (assuming windows need to remain closed based on a fixed temperature test). The assessment identifies that the top three floors (eastern façade A2) and top two floors (eastern façade A3) are deemed 'high risk' in terms of noise levels. - The overheating report has modelled the sample dwellings based on the principle of relying on natural ventilation. Constraints for residents to open windows have been identified, including noise from the railway and risk of crime for ground floor habitable rooms. In principle, where no mitigation is proposed, the overheating model should be based on mechanically ventilated dwellings with different criteria. a. The report does not clearly set out 1) which constraints apply to which dwellings, 2) proposed mitigation to noise/crime constraints, 3) which overheating criteria should be met. A plan should be included annotating which dwellings are subject to adverse noise constraints, which will have mitigation (and what mitigation), and whether they will be assessed under the natural or the mechanical ventilation (closed windows scenario) criteria. b. The report notes that the worst-case six dwellings have been modelled. If no acoustic mitigation is proposed for the dwellings that are subject to adverse noise levels, these should be assumed closed, and the assessment should assume they are mechanically ventilated. The applicant has Options 1-6 assuming open windows with various levels of mechanical ventilation/window opening and solar gain mitigation, without noise mitigation. c. Paragraph 1.6.1.2 notes that the rooms exposed to noise levels would not pass TM59 assuming closed windows without supplementary mechanical ventilation or temperature lopping. Paragraph 1.6.1.5 notes that acoustic mitigation was investigated but discounted (but no details). The applicant notes that enhanced mechanical ventilation 6-9ach would be suitable for closed windows, or temperature lopping. However, no modelling has been undertaken to demonstrate compliance. d. The applicant stated in pre-application discussions that secure by design measures were included in the design to allow residents to open their windows at night. No mitigation measures have been proposed to this effect. b. In summary: the applicant needs to clearly respond to point (a). Then, the overheating model needs to be done for natural/mechanical ventilation criteria, mitigating the overheating risk with measures in line with the Cooling Hierarchy. This means that passive design solutions need to be implemented before seeking enhanced mechanical ventilation or temperature lopping.	

Further detailed comments to report:
- The Executive Summary should be clear on what the parameters/inputs of the modelled options are before summarising their results.
- Please set out the difference in energy demand, level of control and comfort between enhanced ventilation (6-9ach) and temperature lopping.
- The assumed pipework heat losses of 11W/m may be a little high depending on the diameter of the pipe and how the system is designed.
- Confirm that Haringey Council will own the overheating risk when the building is occupied (not the residents).

Overheating Design Guidelines Outline Plots
Design guidelines for the outline plots are described in Section 6. In summary this includes:
- Natural ventilation preferred approach
- Optimising passive design
o Cross-ventilation through openable windows in dual aspect rooms and flats
o MVHR
o Balcony placement to reduce solar gain on southern facades
o Deep window revels (200-300mm)
o Set maximum glazing area to maximum 25% of its floor area
o Reduce floor-to-ceiling glazing in favour of more horizontal glazing
o Consider orientation and massing in relation to layouts

5. Sustainability

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

BREEAM Communities – masterplan level
The applicant has prepared a BREEAM Communities Pre-Assessment Report for the whole masterplan. This holistic approach to sustainability is supported as part of this hybrid application and it will continue to help shape the development with a community focus thereafter. A 'Very Good' rating should be achievable according to the Pre-Assessment. The tracker assessed that a score of 76.8% is achievable for Step 1 (with 22% of potential extras for Step 1); this results in an overall achievable score of 27.3% so far. The applicant is aiming to achieve 'Excellent', which should be attainable as well.

BREEAM Requirement – plot level
Policy SP4 requires all new non-residential developments to achieve a BREEAM rating 'Very Good' (or equivalent), although developments should aim to achieve 'Excellent' where achievable. BREEAM New Construction will sought at plot level in addition to the BREEAM Communities accreditation. Furthermore, Home Quality Mark (HQM) will be

sought for the new homes at plot level. The dwellings at Plot A are predicted to achieve a 4-star rating (256 credits), according to the HQM Pre- Assessment.

Living roofs

All development sites must incorporate urban greening within their fundamental design, in line with London Plan Policy G5. The development is proposing living roofs in the development.

All landscaping proposals and living roofs should stimulate a variety of planting species. Mat-based, sedum systems are discouraged as they retain less rainfall and deliver limited biodiversity advantages. The growing medium for extensive roofs must be 120-150mm deep, and at least 250mm deep for intensive roofs (these are often roof-level amenity spaces) to ensure most plant species can establish and thrive and can withstand periods of drought. Living walls should be rooted in the ground with sufficient substrate depth. Living roofs and walls are supported in principle, subject to detailed design. Details for living roofs will need to be submitted as part of a planning condition.

Whole Life Carbon
Policy SI2 requires developments referable to the Mayor of London to submit a Whole Life Carbon Assessment and demonstrate actions undertaken to reduce life-cycle emissions.

Plot A	Estimated carbon emissions	Meets benchmark?
Modules A1-A5	415 $kgCO_2e/m^2$	Meets GLA target (800 $kgCO_2e/m^2$) and LETI aspirational target (500 $kgCO_2e/m^2$)
Modules B-C (excl. B6 and B7)	218 $kgCO_2e/m^2$	Meets GLA target (400 $kgCO_2e/m^2$) and LETI aspirational target (240 $kgCO_2e/m^2$)

Action:
- The applicant's outline WLC report is not loading correctly which means information is missing (sentences or words). Please submit a new version of the pdf to receive comments.

Circular Economy

Policy SI7 requires applications referable to the Mayor of London to submit a Circular Economy Statement demonstrating how it promotes a circular economy within the design and aim to be net zero waste. Haringey Policy SP6 requires developments to seek to minimise waste creation and increase recycling rates, address waste as a resource and requires major applications to submit Site Waste Management Plans.

The applicant has submitted a hybrid CES and a detailed CES for Plot A.

The principles used for this development are:
- Long-term habitation

- Phased development over 10 years, including meanwhile uses, especially to support repair and storage capacity.
- Robustness and maintenance in terms of public realm design appropriate for large pedestrian numbers
- Integration of social aspects into the masterplan circular economy
- Future proofing the site for new economic and social trends
- Based on the Lendlease Sustainability Standards (Sustainable Economic Growth, Vibrant & Resilient Communities and Cities, and Healthy Planet and People)
- Designing for longevity of residential
- Designing for flexibility and adaptability of all uses
- Promoting flexible spaces for all open and green spaces
- Using new materials responsibly and sustainably, re-using and using less materials, sitewide
- Restoring and enhancing the community
- Reusing materials from existing buildings with a Pre-Demolition Audit (included in Appendix E for Plot A)
- Minimise operational waste and provide adequate space for recycling site-wide

Outline: The report sets out the Outline Application Key Commitments (Table 4-1), Recycling and waste reporting form (Table 4-2). Bill of materials is not available at masterplan level. The report includes a circular economy narrative and implementation strategy.

Plot A: The report sets out the Key Commitments (Table 3), Bill of materials (Table 4) and Recycling and waste reporting form (Table 5).

6. Conclusion
Overall, it is considered that the application cannot currently be supported as it does not comply wholly with London Plan Policies SI2, SI4 and Local Plan Policies SP4 and DM21.

Planning Conditions
To be secured (with detailed wording TBC):
- Energy strategy
- Overheating
- BREEAM Communities Certificate
- BREEAM New Construction Commercial Certificate(s)
- Home Quality Mark Certificates
- Living roofs and walls
- Circular Economy
- Whole-Life Carbon
- Biodiversity

Planning Obligations Heads of Terms
- Be Seen commitment to uploading energy data
- Deferred carbon offset mechanism (and associated obligations), including a 10% management fee

- Connect to the DEN within 10 years of the permission, if it doesn't come forward a lowcarbon fallback position should be submitted and agreed by the Local Planning Authority.

Carbon Management Response 04/03/2022

In preparing this consultation response, we have reviewed:

- Plot A TM59 Overheating Report, prepared by Aecom (dated February 2022);
- Lendlease Consultant response to CM comments on overheating issued 21 December 2021, rev 01;
- Lendlease Consultant response to CM comments issued 21 December 2021, dated 15th February 2022;
- GLA carbon emission reporting spreadsheet for Plot A (in two sheets and a third sheet summarising);
- Relevant supporting documents.

Summary

The proposed development now complies with the relevant London Plan and Local Plan planning policies in relation to carbon reduction and sustainability, subject to securing the conditions as listed at the end of this response.

Energy

Discussions with the applicant confirmed the justification for using SAP2012 carbon factors.

Plot A

A revised table for Plot A has been issued – copied below.

	Plot A carbon reductions			
	Interim gas boiler scenario		**Connection to DEN scenario**	
(SAP2012 emission factors)	**tCO_2**	**%**	**tCO_2**	**%**
Baseline emissions	80.9		80.9	
Be Lean savings	4.9	6%	4.9	6%
Be Clean savings	0	0%	44.2	54.6%
Be Green savings	9.2	11.4%	9.2	11.4%
Cumulative savings	14.1	91%	58.3	72.1%
Carbon shortfall to offset (tCO_2)	66.8		22.6	
Carbon offset contribution	£190,380		£64,410	

An initial offset contribution for Plot A of £64,410 + 10% management fee would be due.

If the development does not connect to the DEN, a deferred offset contribution of £125,970 + 10% management fee will be due (£190,380 - £64,410).

Overheating

The following changes have been made to the report that are of note:

- The sample units as noted above have now been reworked with the London Weather Centre file.
- Additional units have been modelled, increasing the sample size from 6 to 23 (15 in A1; 2 duplex units in A2/A3).

Other considerations/responses are:

- Noise from the stadium was considered to be blocked by the massing of Block D.
- Noise from stadium crowds travelling to or waiting at White Hart Lane were not considered within the response.
- 10 units (top three floors on eastern façade of Blocks A2 and top two floors of Block A3) will be constrained by noise due to its orientation facing the railway. These will be mitigated through mechanical ventilation or a peak lopping system.
- Natural ventilation openable to 90 degrees (with 100mm night-time restrictors), g-values of 0.47 and internal blinds (shading coefficient of 0.353 and short-wave radiant fraction of 0.68), will be achieved for all other units similar to the sampled dwellings.

The initial overheating assessment was carried out on block A2 (which also represents block A3 as they have the same layouts).

Various options were modelled:

- Option 1 - 100mm restrictors on the side hung windows were removed, all windows open to 90°.
- Option 2 - As option 1, with a more intelligent user behaviour by the occupier, i.e. windows are shut to preventing warm external air entering space at peak times, allowance of night-time trickle ventilation through the windows using the 100mm restrictors.
- Option 3 - As option 2, with the openings updated: all side hung windows that are not opening onto a balcony are restricted to 100mm, bottom pane windows are openable via bottom hung with 100mm opening restrictions. All balcony doors are closed, one of the two balcony doors in each apartment is opaque, 1100mm windowsill (balconies) has a fully openable window to 90°.
- Option 4 – As option 3, with restrictors on the side hung windows increased to 300mm.
- Option 5 – As option 4, with restrictors on the side hung windows increased to 600mm. Internal blinds applied to the closed balcony doors.
- Option 6 – As option 5, side hung windows no longer have restrictors and are fully openable to 90°.
- Option 6a includes the same parameters as option 6 above, however fully openable windows now feature blinds that only operate when the windows are closed. The blinds feature a shading coefficient of 0.353 and short-wave radiant fraction of 0.68 were applied to the closed balcony doors.

Compliance with DSY1 2020s								
Unit	Base case	Option 1	Option 2	Option 3	Option 4	Option 5	Option 6	Option 6a
A2.02.01	Fail	Fail	Fail	Fail	Fail	Pass	Pass	Pass
A2.02.02	n/a	n/a	n/a	Fail	Fail	Pass	Pass	Pass
A2.02.03	Fail	Fail	Fail	Fail	Fail	Fail	Pass	Pass
A2.05.01	Fail	Fail	Fail	Fail	Fail	Fail	Pass	Pass
A2.05.02	n/a	n/a	n/a	Fail	Fail	Fail	Fail	Pass
A2.05.03	Fail	Fail	Fail	Fail	Fail	Fail	Fail	Pass

Compliance of Option 6a	
	Number of habitable rooms pass TM59
DSY1 2020s	24/24
DSY2 2020s	9/24
DSY3 2020s	10/24

Overheating risk in corridors

These assessments have been done in the event that the windows in the corridor could not be opened.

TM59 assessment result – Communal corridor overheating results			
Ventilation rate	No. hours > 28ºC	% Annual hours > 28ºC	Significant overheating risk?
1ach	2986	34.1	Yes
2ach	1271	14.5	Yes
3ach	377	4.3	Yes
4ach	200	2.3	No

Retrofit options for future reduction of overheating risk

To be considered in order of the Cooling Hierarchy:

- More efficient internal lighting installations to further reduce internal gains
- Efficient LTHW pipework to minimise heat loss and heat gain to spaces.
- Consider additional external shading, louvres, fins and canopies.
- Internal shading devices upgrades
- Glazing replacement strategies – improve solar control (g-value)

- Consider retrofits to allow windows/doors to remain more open at night.
- Improve cross ventilation by considering fire louvred/dampers above internal doors to allow additional air flow.
- Increased mechanical ventilation rates
- Addition of temperature lopping units and or increase cooling capacities
- Consider air movement fans to assist comfort temperatures, i.e. ceiling fans, standalone fans

Conclusion
The overheating strategy is considered generally acceptable, subject to securing a planning condition.

Planning Obligations Heads of Terms

- Energy Plan and Sustainability Review by phase
- Be Seen commitment to uploading energy data
- Deferred carbon offset mechanism (and associated obligations), including a 10% management fee
- Connect to the DEN within 10 years of the permission, if it doesn't come forward a low-carbon fallback position should be submitted and agreed by the Local Planning Authority.

Planning Conditions

Energy Strategy (Plot A)
The development hereby approved shall be constructed in accordance with the Energy Statement for Plot A prepared by Aecom (dated October 2021) delivering a minimum 72% improvement on carbon emissions over 2013 Building Regulations Part L, with SAP2012 emission factors, high fabric efficiencies, connection to the Decentralised Energy Network and a minimum 36 kWp solar photovoltaic (PV) array.

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

- *Confirmation of how this development will meet the zero-carbon policy requirement in line with the Energy Hierarchy;*
- *Confirmation of the necessary fabric efficiencies aiming to achieve a minimum 10% reduction in SAP2012 carbon factors, including details to reduce thermal bridging;*
- *Specification and efficiency of the proposed Mechanical Ventilation and Heat Recovery (MVHR), with plans showing the rigid MVHR ducting and location of the units;*
- *Details of the PV, demonstrating the roof area has been maximised, with the following details: a roof plan; the number, angle, orientation, type, and efficiency level of the PVs; how overheating of the panels will be minimised; their peak output (kWp);*
- *A metering strategy.*

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

(b) Within six months of first occupation, evidence that the solar PV installation has been installed correctly shall be submitted to and approved by the Local Planning Authority, including photographs of the solar array, a six-month energy generation statement, and a Microgeneration Certification Scheme certificate.

(c) Within six months of first occupation, evidence shall be submitted to the Local Planning Authority that the development has been registered on the GLA's Be Seen energy monitoring platform.

Reason: To ensure the development reduces its impact on climate change by reducing carbon emissions on site in compliance with the Energy Hierarchy, and in line with London Plan (2021) Policy SI2, and Local Plan (2017) Policies SP4 and DM22.

Gas Boilers (Plot A)
The combination gas boilers that are to be installed throughout the development shall achieve a minimum seasonal space heating energy efficiency rating of 92% as defined under the Energy-related Performance Directive (ErP), without relying on additional technologies to control the operation of the boiler. The applicant shall demonstrate compliance by supplying installation specification within three months post-completion of the development. Once installed these boilers shall be operated and maintained as such thereafter.

Reason: In the interest of reducing the impacts of climate change, in accordance with London Plan (2021) Policy SI2, and Local Plan (2017) Policies SP4 and DM21.

Energy Strategy (Reserved Matters Applications)
(a) Each application for the first reserved matters relating to Appearance, Layout or Scale submitted by phase/block shall be accompanied by an Energy Strategy. This phase block shall achieve the minimum requirements in line with the most up to date planning policy framework at the time of submission and shall achieve no less than a reduction in carbon emissions of 46% (residential) or 40% (non-residential) compared to a Building Regulations Part L 2013 compliant building with SAP2012 carbon factors.

The strategy will set out:

- *Confirmation of how this phase/block will meet the zero-carbon policy requirement in line with the Energy Hierarchy;*
- *How this phase/block will achieve minimum carbon reductions at the Be Lean Stage in accordance with the most up-to-date planning policy requirements, but no less than 10% (residential) or 18% (non-residential) with SAP2012 carbon factors;*
- *The proposed heating, renewable energy and ventilation strategies (including their efficiency, output and layout);*
- *How the phase/block will contribute to the site-wide minimum solar PV array output of 1,274 kWp, demonstrating that the roof spaces have been maximised to deliver the maximum amount of solar PV output;*
- *Calculate carbon offset contribution for that phase/block;*
- *A metering strategy;*

- *Design of the energy centre detailing space for a sub-station to connect to the off-site (primary) network and on-site (secondary) network, as well as dry primary pipework from the energy centre to the agreed point of connection.*

The final agreed energy strategy shall be installed and operation prior to the first occupation of the relevant phase/block. The development shall be carried out strictly in accordance with the details so approved and shall be operated and maintained as such thereafter.

Should the agreed target not be able to be achieved on site through energy measures as set out in the aforementioned strategy, then any shortfall should be offset at the most up-to-date approved cost per tonne of carbon plus a 10% management fee. Should an increased level of CO_2 reduction be achieved, any carbon offset payment would be reduced in line with this price.

Reason: To ensure the development reduces its impact on climate change by reducing carbon emissions on site in compliance with the Energy Hierarchy, and in line with London Plan (2021) Policy SI2 and SI3, and Local Plan (2017) Policies SP4 and DM22.

Energy Strategy (Commencement of each Block/Phase)
(a) Prior to the commencement of construction works for each blocks/phase, details relating to the Energy Strategy must be submitted to and approved by the local planning authority. This shall include:

- *A metering strategy;*
- *Detail of pipe routes and lengths, pipe sizes (taking account of flow and return temperatures and diversification) and insulation to determine heat loss from the pipes in Watts per dwelling in order to demonstrate losses have been minimised;*
- *Further detail of how the developer will ensure the performance of the system will be safeguarded through later stages of design (e.g., value engineering proposals by installers), construction and commissioning including provision of key information on system performance required by CoP1 (e.g. joint weld and HIU commissioning certificates, CoP1 checklists, etc.);*
- *Any outstanding requirements set out in a response to the Energy Strategy by the local planning authority or GLA submitted for relevant Reserved Matters Application of that plot/block.*

(b) Within six months of completion of each block, evidence shall also be submitted to the Local Planning Authority that the development has been registered on the GLA's Be Seen energy monitoring platform.

Reason: To ensure the development reduces its impact on climate change by reducing carbon emissions on site in compliance with the Energy Hierarchy, and in line with London Plan (2021) Policy SI2 and SI3, and Local Plan (2017) Policies SP4 and DM22.

Overheating (Plot A)
Prior to the commencement of development, or at the submission of any amendment application for Plot A concerning the design and layout, a revised Overheating Assessment shall be submitted to and approved by the Local Planning

Authority. The overheating model will assess the overheating risk in line with CIBSE TM59 (using the London Weather Centre data) and demonstrate how the risks have been mitigated and removed through design solutions. These mitigation measures shall be operational prior to the first occupation of the development hereby approved and retained thereafter for the lifetime of the development.

This report will include:

- *Additional overheating modelling for Units in Block A1 for a representative sample of dwellings;*
- *Remodelling of the sample dwellings modelled for Blocks A2 and A3 incorporating any design changes following planning permission;*
- *Annotated floorplans showing which spaces/dwellings have been modelled. The report should model all single-aspect dwellings, min. 75% of rooms facing south or south-west, min. 50% of top-floor rooms, and rooms closest to any risk of crime / noise and / or air pollution source that assume windows closed at all times (unless the constraint is mitigated to allow for openable windows as confirmed in the Noise and the Air Quality Assessments).*
- *Details of the mitigation design measures incorporated within the scheme (including details of the feasibility of prioritising passive cooling and ventilation measures in line with the Cooling Hierarchy) to ensure adaptation to higher temperatures are addressed, the spaces do not overheat, and the use of active cooling is avoided.*
- *Information supporting the assumed pipework heat losses as required under the Energy Strategy condition.*

REASON: In the interest of reducing the impacts of climate change, to enable the Local Planning Authority to assess overheating risk and to ensure that any necessary mitigation measures are implemented prior to construction, and maintained, in accordance with London Plan (2021) Policy SI4 and Local Plan (2017) Policies SP4 and DM21.

<u>Overheating (Outline - Residential)</u>
(a) Each application for the first reserved matters relating to Appearance, Layout or Scale submitted by phase/block shall be accompanied by a detailed Overheating Assessment. The Overheating Assessment shall be submitted for the written approval of the Local Planning Authority and shall be informed by Dynamic Thermal Modelling based on CIBSE TM59 for the residential spaces and TM49 weather files. The assessment shall be undertaken in line with the following:

i. The London Weather Centre dataset;
ii. Mandatory pass of DSY1 for 2020s file, with the necessary mitigation measures in line with the Cooling Hierarchy;
iii. Demonstrate the reduction in overheating risk for future weather patterns (DSY2 and DSY3 2020s, DSY1 2050s). Mitigation for the 2020s period must be integrated into the design through passive design measures as far as feasible. The risks and the mitigation strategy for the periods of the 2050s should be set out in a retrofit plan, confirming that measures can be fitted in the future and who will own the overheating risk;
iv. Include any replacement / repair cycles and the annual running costs for the occupiers;
v. Floor plans highlighting the modelled dwellings across the development and showing all rooms (with unique reference number). The applicant is expected to model the following most likely to overheat dwellings:

- *At least 15% of all rooms across the development site;*

- *All single-aspect dwellings facing west, east, and south;*
- *At least 50% of rooms on the top floor;*
- *75% of all modelled rooms will face South or South/west;*
- *Rooms closest to any risk of crime / noise and / or air pollution source, with windows closed at all times (unless mitigation measures demonstrate that these windows can be opened, as confirmed in the Noise and the Air Quality Assessments).*

(b) Any overheating mitigation measures set out in an approved Overheating Assessment shall be implemented before any of the dwellings in the Block to which they relate are first occupied and retained thereafter for the lifetime of the development.

REASON: In the interest of reducing the impacts of climate change, to enable the Local Planning Authority to assess overheating risk and to ensure that any necessary mitigation measures are implemented prior to construction, and maintained, in accordance with London Plan (2021) Policy SI4 and Local Plan (2017) Policies SP4 and DM21.

<u>Overheating (Outline - Non-residential)</u>
At least six months prior to the occupation of each non-residential area, an Overheating Report must be submitted to and approved by the Local Planning Authority if that space is to be occupied for an extended period or will accommodate any vulnerable users, such as office/workspace, community, healthcare, or educational uses.

The report shall be based on the current and future weather files for the CIBSE TM49 London Weather Centre dataset. It shall set out:

- *The proposed occupancy profiles and heat gains in line with CIBSE TM52*
- *The modelled mitigation measures which will be delivered to ensure the development complies with DSY1 for the 2020s weather file.*
- *A retrofit plan that demonstrates which mitigation measures would be required to pass future weather files (DSY2 and DSY3 2020s; DSY1 2050s), with confirmation that the retrofit measures can be integrated within the design.*

The mitigation measures hereby approved shall be implemented prior to occupation and retained thereafter for the lifetime of the development.

REASON: In the interest of reducing the impacts of climate change, to enable the Local Planning Authority to assess overheating risk and to ensure that any necessary mitigation measures are implemented prior to construction, and maintained, in accordance with London Plan (2021) Policy SI4 and Local Plan (2017) Policies SP4 and DM21.

<u>Living roofs/Living walls</u>
(a) Prior to the commencement of development, details of the living roof(s) and/or living wall must be submitted to and approved in writing by the Local Planning Authority. Living roofs must be planted with flowering species that provide amenity and biodiversity value at different times of year. Plants must be grown and sourced from the UK and all soils and compost used must be peat-free, to reduce the impact on climate change. The submission shall include:

i. A roof plan identifying where the living roof(s) will be located;

ii. *A ground floor plan identifying where the living wall(s) will be rooted in the ground, if any, and a section showing the soil planting depth;*
iii. *A section demonstrating varying settled substrate levels of no less than 120mm for extensive living roofs (varying depths of 120-180mm), and no less than 250mm for intensive living roofs (including planters on amenity roof terraces);*
iv. *Roof plans annotating details of the substrate: showing at least two substrate types across the roof, annotating contours of the varying depths of substrate;*
v. *Details of the proposed type of invertebrate habitat structures on the roof(s) with a minimum of one feature per 30m^2 of living roof: substrate mounds and 0.5m high sandy piles in areas with the greatest structural support to provide a variation in habitat; semi-buried log piles / flat stones for invertebrates with a minimum footprint of 1m^2, rope coils, pebble mounds of water trays;*
vi. *Details on the range and seed spread of native species of (wild)flowers and herbs (minimum 10g/m^2) and density of plug plants planted (minimum 20/m^2 with roof ball of plugs 25m^3) to benefit native wildlife, suitable for direct sunshine/shading of the different living roof spaces. The living roof will not rely on one species of plant life such as Sedum (which are not native);*
vii. *Roof plans and sections showing the relationship between the living roof areas and photovoltaic array, if any; and*
viii. *Management and maintenance plan, including frequency of watering arrangements.*

(b) Prior to the occupation of 90% of the dwellings of the Block to which the living roof(s) and/or living wall(s) relate, evidence must be submitted to and approved by the Local Planning Authority that the living roof(s) have been delivered in line with the details set out in point (a). This evidence shall include photographs demonstrating the measured depth of substrate, planting and biodiversity measures. If the Local Planning Authority finds that the living roof(s)/wall(s) have not been delivered to the approved standards, the applicant shall rectify this to ensure it complies with the condition. The living roof(s)/wall(s) shall be retained thereafter for the lifetime of the development in accordance with the approved management arrangements.

Reason: To ensure that the development provides the maximum provision towards the creation of habitats for biodiversity and supports the water retention on site during rainfall. In accordance with London Plan (2021) Policies G1, G5, G6, SI1 and SI2 and Local Plan (2017) Policies SP4, SP5, SP11 and SP13.

<u>BREEAM (Communities)</u>
(a) Prior to commencement on site, a BREEAM Communities design stage accreditation certificate must be submitted to and approved by the Local Planning Authority confirming that the development will achieve a BREEAM "Very Good" outcome (or equivalent), aiming for "Excellent".

The development shall then be constructed in strict accordance with the details so approved, shall achieve the agreed rating and shall be maintained as such thereafter for the lifetime of the development.

(b) At least six months prior to occupation, a BREEAM Communities post-construction certificate issued by the Building Research Establishment must be submitted to the local authority for approval, confirming this standard has been achieved.

In the event that the development fails to achieve the agreed rating for the development, a full schedule and costings of remedial works required to achieve this rating shall be submitted for our written approval with 2 months of the submission of the post construction certificate. Thereafter the schedule of remedial works must be implemented on site within 3 months of the Local Authority's approval of the schedule, or the full costs and management fees given to the Council for offsite remedial actions.

Reasons: In the interest of addressing climate change and securing sustainable development in accordance with London Plan (2021) Policies SI2, SI3 and SI4, and Local Plan (2017) Policies SP4 and DM21.

<u>BREEAM (New Construction)</u>
(a) Prior to commencement on site, a BREEAM New Construction design stage accreditation certificate for every type of non-residential use must be submitted to and approved by the Local Planning Authority confirming that the development will achieve a BREEAM "Very Good" outcome (or equivalent), aiming for "Excellent".

The development shall then be constructed in strict accordance with the details so approved, shall achieve the agreed rating and shall be maintained as such thereafter for the lifetime of the development.

(b) At least six months prior to occupation, a BREEAM New Construction post-construction certificate issued by the Building Research Establishment must be submitted to the local authority for approval for every type of non-residential use, confirming this standard has been achieved.

In the event that the development fails to achieve the agreed rating for the development, a full schedule and costings of remedial works required to achieve this rating shall be submitted for our written approval with two months of the submission of the post construction certificate. Thereafter the schedule of remedial works must be implemented on site within three months of the Local Authority's approval of the schedule, or the full costs and management fees given to the Council for offsite remedial actions.

Reasons: In the interest of addressing climate change and securing sustainable development in accordance with London Plan (2021) Policies SI2, SI3 and SI4, and Local Plan (2017) Policies SP4 and DM21.

<u>Circular Economy (Outline applications)</u>
Each application for reserved matters shall be accompanied by a detailed Circular Economy Statement and Operational Waste Management Strategy in line with the GLA's Circular Economy Statement Guidance, which shall be submitted to and approved in writing by the Local Planning Authority. The statement shall adhere to the principles set out in the draft Circular Economy Statement. The development shall be carried out in accordance with the details so approved.

Reason: In the interests of sustainable waste management and in order to maximise the re-use of materials.

<u>Circular Economy (Post Completion Reports)</u>
Prior to the occupation of any phase, a Post Completion Report setting out the predicted and actual performance against all numerical targets in the relevant Circular Economy Statement shall be submitted to the GLA at: circulareconomystatements@london.gov.uk, along with any supporting evidence as per the GLA's Circular Economy Statement Guidance. The Post Completion Report shall provide updated versions of Tables 1 and 2 of the Circular Economy Statement, the Recycling and Waste Reporting form and Bill of Materials. Confirmation of submission to the GLA shall be submitted to, and approved in writing by, the local planning authority, prior to occupation.

Reason: In the interests of sustainable waste management and in order to maximise the re-use of materials.

<u>Whole Life Carbon</u>
Prior to the occupation of each building, the post-construction tab of the GLA's whole life carbon assessment template should be completed accurately and in its entirety in line with the GLA's Whole Life Carbon Assessment Guidance. The post-construction assessment should provide an update of the information submitted at planning submission stage, including the whole life carbon emission figures for all life-cycle modules based on the actual materials, products and systems used. This should be submitted to the GLA at: ZeroCarbonPlanning@london.gov.uk, along with any supporting evidence as per the guidance. Confirmation of submission to the GLA shall be submitted to, and approved in writing by, the local planning authority, prior to occupation of the relevant building.

Reason: In the interests of sustainable development and to maximise on-site carbon dioxide savings.

Stakeholder	Comment	Response
Conservation Officer	1 Site: The extensive development site forming the High Road West masterplan is in North Tottenham, where a well-preserved, mainly Georgian, and Victorian townscape survive as part of the North Tottenham Conservation Area. The setting of this valuable historic townscape and street frontage is set to gradually change and become progressively complemented in the background by residential, high rise contemporary developments to both sides of the High Road as part of the adopted vision of the Council for the urban regeneration of the North Tottenham area. This extensive development site encompasses in its current configuration various character areas and buildings of various age, various degrees of architectural and urban quality which coexist in a juxtaposed fashion and include parts of the North Tottenham Conservation Area which is interrupted between Moselle place and Brereton Road where a terrace of locally listed buildings still survives, the light industrial buildings sitting just at the back of the historic frontage and forming the Peacock Industrial Estate, the Goods yards site which borders the Overground railway line and the modern residential estates , including the Whitehall street estate located to the west of the railway line, comprised between the south of White Hart Lane and Brereton Road where the gap in the North Tottenham Conservation Area ends and the Conservation Area boundary resumes and is signposted by the locally listed St Francis de Sales school. The immediate surrounding of the development site is framed to the north by the five storey Brook House primary school, the six storey Mallory Court Apartments and the 23 storey high Rivers Apartment tower. To the immediate east of the development site which extends along the northernmost stretch of Tottenham High Road and its Conservation Area the existing townscape is characterised by a prevailing two-to-three storey historic frontage interspersed with modern buildings up to 5 storeys high and one-to-two light industrial buildings to the back. To the south the development site is defined along Brereton Road by the two storeys, locally listed St Francis De Sales church and single storey annexed school both included within the North Tottenham Conservation Area. To the west the site is bound by the Overground railway line serving White Hart Lane station. The proximity to and the overlapping of the development site with the North Tottenham Conservation Area and the locally listed buildings comprised between Moselle Place and Brereton Road are fundamental considerations to understand and address the heritage sensitivities and constraints related to this project. The Conservation Area and its heritage assets also represent unique opportunities to design the most heritage-sensitive and appropriate development proposals tailored to this unique and irreplaceable historic environment. 2 The Conservation Area- overview	Officers are confident that the submitted control documents would ensure the concerned raised can be addressed through reserved matters applications. The less than substantial harm arising to designed and non-designated heritage assets is considered to be outweighed by the significant public benefits arising from the development including but not limited to new housing (including affordable housing, substantial, public realm improvements, new access routes, new civic square, new public

Stakeholder	Comment	Response
	Tottenham High Road Conservation Area is a linear Conservation Area within a densely built-up urban setting with an almost intact 19th century townscape incorporating notable surviving examples of earlier periods. The areas immediately to the east and west of the High Road have changed dramatically over the centuries. Despite these changes the townscape retains a high degree of historical continuity, maintaining a contained linear street pattern forming a sequence of linked spaces and sub spaces, with a notable variety and contrast in architectural styles and materials. The street width and alignment still follow the form established by the mid-19th century. The development site runs along the northern part of the Conservation Area, which is the best surviving townscape section of the High Road, containing some outstanding Georgian architectures as part of a built sequence reflecting changing patterns of development from the early/mid-18th century through the 19th to the 20th century. The buildings of varying ages contribute to a cohesive and contained streetscape due to the general conformity in scale, height, and materials together with the variation in silhouette or roofline. Especially the section of the High Road contained between Brantwood Road and White Hart Lane, is the most complete part of the Conservation Area in terms of its surviving historic buildings and townscape form. The western frontage of the Conservation Area It is useful to focus more in detail on the western side of the Conservation Area and its most valuable heritage buildings as this part and related street frontage will be immediately adjoined by the proposed development: the High Road's northern 'entrance' is defined on the west side by listed buildings Nos. 867-869, an imposing group of early-18th century of houses, and by the Coach and Horses public house opposite, of early-19th century origins, which announce the predominantly Georgian character of the northernmost stretch of the High Road. This short entry sequence terminates with a gap site fronting the timber yard (Nos. 855-863), enclosed by unsightly hoardings, and is marked by the mature street tree on the west side of the High Road. Buildings at Nos 867-869 High Road offer an opportunity for preservation and enhancement of the character of the gateway into the Conservation Area from north where the new development will be largely legible in the background of the Conservation Area. Further to the south, along the High Road the continuous building frontage on the west side contains a mix of 18th, 19th and 20thcentury buildings. The three locally listed early-18th century houses at Nos. 847-851 have modern shop fronts and like the early-19th century building at No. 845 have been altered due to painting, rendering and replacement windows. The Edwardian public house at Nos. 841-843 is an important punctuation in the street scene with its mock Tudor style and taller gable roof with brick chimney stacks. South of the pub at Nos 835-839 stand three early-19th century houses with shops, originally a uniform terrace that may have also incorporated the two houses replaced by the	park, new employment and training opportunities and new community infrastructure.

Stakeholder	Comment	Response
	Chequers; No. 835 is an altered yet neutrally contributing building, whereas the poorly proportioned post-war building at Nos 831-833 detracts from the character of the Conservation Area. To the south of Brunswick Square passageway, the locally listed building at No. 829, dating from the early-19th century, was a public house in the 1880s, and No. 827, rebuilt c1900, has a projecting gable and well-preserved 1900's shop surrounds. The locally listed building at Nos. 823-825, rebuilt in the late-19th century, has a decorative plaster frieze below the cornice and a good shop front with Corinthian columns. The west side of the High Road is further defined to the south by a significant sequence of locally listed properties at Nos 813-817 High Road, by grade II listed properties at Nos 819-821 High Road which are grade II listed as an early C18, relatively well-preserved pair of three-storey Georgian townhouses with late C19 shops on the ground floor and a symmetric façade composition complemented by original features. These buildings have been progressively converted, redeveloped, altered externally and to a greater degree internally and have lost their original use. But despite all these alterations this pair retains many original C18 features and the legibility of their original façade and spatial composition. From here to the corner with White Hart Lane the street frontage continues with a good sequence of 18th and 19thcentury Locally listed buildings, including properties at Nos. 809-811 characterised by double-pitched mansard roof front and back with a central valley gutter. The rear elevation appears to have early sash windows with frames flush with the brickwork. They possibly date from the early/mid18th century although the shop fronts were added later. The grade II listed building at Nos 797-799 The locally listed corner building at Nos. 793-795 which returns on White Hart Lane is a late-19th century commercial building with cast-iron cresting at roof level and pilasters to ground floor. To the south of White Hart Lane properties at Nos 769-781 are a group of locally listed buildings which conclude the northern part of the Conservation Area. These buildings reflect the early phase of Victorian commercial development along the High Road. Nos. 773-779 is a mid- 19th century terrace built with original shop fronts. The prominent keystones and cornice line still contribute to the street scene although the terrace and shop fronts have been extensively altered. Nos. 769-771 originally part of a row of five, also with shops, is of a similar date, with the facades now rendered. The late-19th century building immediately to the south on the corner of Moselle Street, just-outside the Conservation Area, and the buildings at Nos 743-759 comprised between Moselle Place and Whitehall Street are a consistent group of locally listed assets. Property at Nos. 743-757 is a three storey terrace of houses with projecting ground floor shops, notable for its prominent keystones and cornice but otherwise much altered in appearance by rendering and painting of the façade, replacement windows and modern shop fronts. This terrace bears townscape and group value.	

Stakeholder	Comment	Response
	The street frontage comprised between Whitehall Street and Brereton Road is characterised by a much-altered Victorian terrace with commercial parade and by a mid-20th century block of flats located at No. 729 High Road and considered a good example of its period incorporating a public library extension and a locally listed, small early-20th century Gothic-style brick sub-station. Just to the south of the development site lies the southern stretch of the North Tottenham Conservation Area with the locally listed 1895 Church of St Francis de Sales prominently standing on the corner between the High Road and Brereton Road with the main façade fronting the high road and the adjacent presbytery and school fronting Brereton Road. The historic townscape surrounding the junction between the High Road and White Hart Lane is especially significant from the heritage conservation perspective because the east side of the High Road, almost opposite White Hart Lane, stand some of the most highly graded and best-preserved Georgian houses known as Northumberland Terrace. The Georgian terrace comprises properties located at Nos. 790 to 802, and 808-810 which together with the opposite street frontage form a densely bult, almost continuous original development two-three storey high that greatly contribute to the sense of enclosure and character of the historic High Road. 2.2 The Conservation Area at White Hart Lane White Hart Lane is characterised between the High Road and the Overground station by a varied yet much altered townscape which encompasses various periods from Georgian through mid to late Victorian up to post-war housing. The south street frontage is characterised by post-war public housing whereas the north side is defined by a much-altered 19th-century terrace that remains significant only for its group value as a contribution to the street enclosure. On the north side of White Hart Lane, starting from the High Road property at Nos. 2-4 is a pair of modest houses that have been much altered. The locally listed building at No 6 was originally one of a pair of small houses, partly rebuilt after the adjoining house was demolished to widen the entrance to Chapel Place which links White Hart Lane with the High Road through the archway between Nos. 811 and 813 High Road. The locally listed former Catholic Chapel and Pastor’s house date from 1826 but the building is now surrounded and obscured by modern sheds and extensions The late-19th century two-storey terraces at Nos. 8-18 and 24-30 on the north side have been substantially altered and were originally one but properties at Nos. 20-22 was demolished early in the 20th century.	

Stakeholder	Comment	Response
	Well set back from the northern street frontage of White Hart Lane and just beside the much-altered property at No. 30 stands the grade II listed The Grange, a mid-18th century house with two wings added to either side in the early to mid-19th century. The setting of the listed building is negatively affected by the poor quality of the neighbouring Victorian terrace on one side and the open yard entrance with security fencing on the other. Further to the west of the north side of White Hart Lane the locally listed building at No. 52 is a detached two-storey house built as the Station Master's house following the opening of White Hart Lane station in 1872. On the south side of White Hart Lane, the street frontage is characterised by Nos. 1-5, a three-storey terrace with shops including an original carriageway, otherwise all much altered. The grade II listed house at No. 7 is an 1840 villa set back from the neighbouring Victorian terrace and uncomfortably located between the Victorian development to its left and the void created by the post-war housing development behind. 2.3 Views in Conservation Area Views north and south from Brantwood Road, at the northern end of the Conservation Area, illustrate the open character looking north, contrasting with the enclosed character of the High Road looking south. Views of the Conservation Area along the linear form of the High Street, in both directions are especially important to read the urban and architectural quality of the area. Views in and out of the Conservation Area from junctions with side roads and from some passageways and alleys also contribute to the experience and understanding of the character of the area. Views from the side streets such as Northumberland Park and White Hart Lane each illustrate a distinct change in scale and character from that along the High Road. 3 Policy: Development in Conservation Area should preserve the character or appearance of the area and development affecting a listed building should preserve the building or its setting or any features of special architectural or historic interest which it possesses. The proposed application should be assessed according to the NPPF, London Plan Policies D3, D4, D9, HC1 and Haringey Development Plan policies SP11, SP12, DM1 and DM9 would apply. 4 Proposal: Hybrid Planning application seeking permission for demolition of existing buildings and creation of new mixed-use development including residential, commercial, business & service, leisure, community uses, and Sui Generis uses together with creation of new public square, park & associated access, parking, and public realm works with matters of	

Stakeholder	Comment	Response
	layout, scale, appearance, landscaping, and access within the site reserved for subsequent approval. The application includes a detailed development proposal for Plot A including demolition of existing buildings at 100 Whitehall Street & Whitehall & Tenterden Community Centre and erection of new buildings of 5-6 storeys containing 60 new affordable homes together with landscaping, parking, and other associated works. 5 Comments: The development proposal brings forward the council's vision for the regeneration of the High Road West area as outlined in the 2014 Tottenham High Road West Framework Masterplan and in the Site Allocation NT5 of the 2017 Tottenham Area Action Plan Development Plan Document. Other high-rise schemes related to Nos. 44-52 White Hart Lane ('the Goods Yard' Planning Ref: HGY/2018/0187) and Nos. 867 – 879 High Road ('the Depot' Planning Ref: HGY/2019/2929) and seeking the partial redevelopment of this site have already secured planning consent, therefore the principle of redevelopment of this extensive site to include high rise buildings in the setting of the Conservation Area is consolidated and accepted. The proposed masterplan acknowledges the heritage constraints surrounding the site and the search for the most effective site layout, Plot location, massing and height distribution on the wider development site have been extensively explored across a number of years of multidisciplinary preapplication discussion that has progressively highlighted the potential offered by this large yet inconsistent and under-developed urban area characterised by limited residential capacity, poor connectivity, fractured street frontages, low quality buildings, lack of public spaces and green spaces. This extensive design exploration has led to the proposed site layout, development Plots, distances and spatial relationships, proposed masses , circulation and landscape design which are supported by a good site analysis, have been informed by pre-application and design review advice and aim to provide a consistent and unifying re-configuration of the development area as well as aiming to enhance the fruition of the development site intended as setting of the adjacent Conservation Area with its heritage assets , as clearly shown in the parameters plans illustrating the carefully thought through Access and Circulation, the Public Realm and Open Space proposal as well as the proposed mix of uses across the site. The Illustrative floor plans provide at the outset a clear overview of the proposed uses immediately backing the historic frontage of the High Street and usefully describe the emerging reconfiguration of the site, its future built proportions, its spatial relationship, and links into the Conservation Area. The overall site layout, proposed public spaces and landscape design, altogether seem to successfully respond to the built and natural constraints of the site, to its topography, its proximity to the densely built historic frontage along the	

Stakeholder	Comment	Response
	High Road and to the opportunities for re-development and repair of the much more fragmented and permeable frontage along White Hart Lane. The characteristic features, sensitivities and opportunities offered by the Conservation Area as well as the need to preserve its primacy and consistent legibility along the High Road have been amply discussed at pre-application stage and are addressed to various degrees in the proposed parameter plans, Design Codes, townscape views. The parameter and illustrative plans show that the carefully planned access and circulation strategy including the sensitively located new access points into the new development from the High Road can ensure minimum disruption to and retention of the dense street frontage in Conservation Area while maximizing the opportunities for creating new access into the site through the Conservation Area frontage along White Hart Lane which will benefit from high quality new development to complement the surviving listed and locally listed buildings there located. At the outset, the illustrative site plans present to many extents a contextually coherent development proposal which is broadly supported form the conservation standpoint. In terms of scale massing and heights, the proposed scheme very sensitively allocates the highest rise Plots along the western edge of the development site, along the Overground railway line, well distanced from the Conservation Area and its High Road street frontage, so that the spatial and visual relationship of the largest and tallest Plots with the two- three storey Conservation Area frontage is softened by the gradually lower height of the intermediate Plots as well as by the soft and hard landscaped openness of the proposed Peacock Park and Moselle Square. The proposed gradual increase in built scale and height from east to west is welcome and supported from conservation grounds as this strategic mass and height allocation is successfully designed to mitigate the potentially overwhelming jump in scale between the two-three storey Conservation Area and the new development with its large buildings and tall towers peripherally located by the western boundary of the development site. Also, the gradual increase in scale and height from south to north in the immediate surrounding of the Grade II listed The Grange and the locally listed Station's master house along White Hart Lane is welcomed in principle as a heritage sensitive approach to the reconstruction of the street frontage and to the integration of the listed and locally listed buildings in the proposed scheme. The Design Code and Architectural Codes provide useful guidelines for design in heritage setting, together with the specific parameters of each individual block and provide the necessary flexibility for future detailed applications to shape the new buildings accordingly to the specific constraints and opportunities posed by neighbouring and surrounding heritage assets. The submitted townscape views further help to understand the specific proportional and architectural relationship between each proposed blocks and neighbouring heritage buildings and related Conservation Area. Focusing on the immediate relationship between proposed new development Plots and surviving	

Stakeholder	Comment	Response
	heritage assets, the proposed illustrative and maximum parameters outline the range of possible impacts of the proposed development on several heritage assets and ultimately provide a useful indication of the most heritage-sensitive massing and height options which are often achieved with the illustrative parameters in such a heritage-sensitive context. As an example, the illustrative plans for Plot I show the opportunity for a large, four storey new development immediately flanking the grade II listed The Grange along the north side of White Hart Lane. The proposed development will form part of an almost totally reconfigured street frontage which is anyway deeply heritage bound, due to the presence of a number of heritage buildings which can still help reinforcing the character of this part of the Conservation Area and consequently Plot I should be sympathetically configured in future detailed applications as largely subordinate to the proportions of the listed asset and should bring the scale of The Grange across the street frontage so to reinforce the primacy and legibility of the listed building and should also more gradually step-up in height so to bridge the existing scale with the proposed increased development along Chapel place. It is unclear at this outline planning stage how the proposed Plots H and I immediately surrounding the listed building at the back and to the eastern flank off the grade I listed building will related to one another and to The Grange in architectural, landscape and spatial terms and it is also unclear at this stage what type of improvements or alterations, if any, will benefit The Grange. The submitted parameters plans, specific Plots' codes and views helpfully show that the illustrative parameters for the Plots H and I, located in the setting of The Grange would already challenge the proportions, height and massing of the Listed Building and its Conservation Area and while these illustrative new Plots may constitute the maximum acceptable built quantum in such sensitive setting, the implementation of the proposed maximum parameters would very likely raise concerns about the overwhelming impact that a coalescing group of bulkier, taller and more imposing new buildings would have on The Grange and on this stretch of the Conservation Area. While the site layout and the potential landscape and architectural aspects of the development proposal surrounding The Grange is positive and welcome in principle, the national importance of the listed building would require a higher level of definition of the proposed developments at Plots H and I directly impacting on its immediate surrounding to achieve the most appropriate development response which can be certainly guided by this masterplan scheme, but is fundamentally deferred to a future detailed application where the optimal design response to The Grange and to this stretch of the Conservation Area will be sought. On the south side of White Hart Lane the parameter plans for Plot G immediately adjacent to the grade II listed White Cottage at No 7 White Hart Lane show a relatively modest illustrative scheme starting at 3 storey height and gradually increasing to 6 storey , but also show the potential for a maximum scale, massing and height of development which risk to overwhelm the small scale, two storey height of the listed house, whose street presence and townscape legibility are already impaired by the recessed building line. The listed building will be flanked by a new building that depending on the plan form, mass and height configuration could constitute a relatively gentle, heritage-sensitive and acceptable transition in scale as per illustrative parameters, but greater heights an masses may prove harmful and will have to be carefully considered and assessed at detailed application stage which will also be the necessary stage to understand how the new development will be materially connected to the listed building without harming its historic fabric and to the character of the White Cottage. The Design Code for Block G states at paragraph 5.9.1 that Plot G	

Stakeholder	Comment	Response
	should be no taller than 3 storeys at the junction with the grade (II) listed building (7 White Hart Lane), however this guidance should be more rigorous and focused on the entire height and bulk of the proposed building, whose developed design is deferred to a later stage, given that the broad suggestion for a modest there storey junction between existing and proposed buildings cannot on its own outweigh the negative impact of a new building whose overall scale and height largely exceed the proportions of the Listed Building The national importance of this listed building requires a much greater level of design definition of the proposed development to fully appreciate its relationship with the heritage asset, but this outline proposal b seems already to confirm that building according to the proposed maximum parameters for Plot G is potentially harmful to the character and significance of the listed house and its Conservation Area. The proposed scheme has benefitted from a number of dedicated design reviews which have contributed to hone various aspects of the masterplan and have highlighted, among others, the need to not only retain the most valuable groups of buildings of the Conservation Area, which would not be sufficient on its own to revive and enhance the experience of the historic environment, but also to strive to complement and reinforce the character of the Conservation Area and its heritage buildings, especially where this character strenuously survives despite having been partially eroded through insensitive alterations, demolitions and insertion of incongruous new buildings such as along the White Hart Lane, or along the stretch of the High Road comprised between Moselle square and Brereton road. The latter is a glaring example of how the distinctive townscape of the historic High Street frontage is such an established and defining feature in this part of the borough that it is still legible to various degrees of architectural quality and intactness throughout the consistently proportioned, locally listed terrace at 759-743 High Road and the neighbouring terrace to the south of Whitehall Street at Nos 741-731 High Road. The surviving locally listed and unlisted Victorian street frontage still retains its coherence and legibility, regardless of the clashing proximity of the neighbouring apartment block building at No 729 High Road incorporating the Coombes Croft Library, which does not belong to the urban and architectural realm of the historic High Road frontage and which, notwithstanding any intrinsic architectural interest, is from an historic townscape perspective an overwhelming and heritage -unsympathetic anomaly and a dividing element imposingly located on the corner of the High Road with Brereton Road, just in between the consistent sequence of surviving Victorian terraces and the locally listed Church landmark. This1950's building represents an intrinsic weakness for the High Road frontage, can be considered at best an historic built exception and evidently sets a clear precedent for maximum height capacity in the redevelopment of that specific corner Plot identified in the proposed masterplan as Plot C where it is unclear if the locally listed gothic style substation adjoining the Coombes Croft Library will be retained. It is evident in the Design Codes and townscape views that the proposed parameter plans start from a conservative illustrative proposal of 6 storey in height, slightly taller than the existing, to allow up to 8 storeys according to maximum parameters which would generate a much taller building than the existing one and this 8 storey building prominently located on the corner of the high road would dominate in views of the western side of the High Road while the two storey St Francis Church would It is therefore evident that while the illustrative parameters may be acceptable in this case, the heritage assets immediately surrounding the development site don't allow for a successful implementation of the proposed maximum parameters for Plot C and the Design Codes accordingly state at paragraph 2.2.6:	

Stakeholder	Comment	Response
	The following Plots must respond to the setting and scale of statutory and non-statutory listed buildings on High Road by preserving their prominence when viewed from the Conservation Area. a. Plot E b. Plot C c. Plot K1 d. Plot K2 It would be useful to re -consider the height parameters for Plot C which could beneficially start at less than 5 storeys, so to achieve an implementable range of heights consistent with the guidance provided in the Design Code which also indicates the most appropriate architectural approach for this plot. The Code and suggested architectural approach are inconsistent with the current maximum parameters and risk to be ineffective as no architectural treatment and finishes can successfully mitigate the impact of excessively tall new blocks in the immediate vicinity of heritage assets. The Design Codes are silent about the heritage-sensitive context of Plot B despite this is in the setting of the locally listed church, school and related Conservation Area and the proposed density, mass articulation and height of Plot B seem substantial and impactful on the setting of the heritage assets due to minimum heights comprised between six and twenty-six storeys. The illustrative scheme for Plot B appears incongruous with the established scale and experience of the neighbouring Conservation Area and Locally listed Church and school to the southside of Brereton Road and the Design Code for Plot B should accordingly acknowledge both the locally listed buildings along Brereton Road and the Conservation Area boundary so to provide useful design guidance for future detailed applications. The Design Codes are silent about the heritage-sensitive context of Plot B despite this is in the setting of the locally listed church, school and related Conservation Area and the proposed density, mass articulation and height of Plot B seem substantial and impactful on the setting of the heritage assets due to minimum heights comprised between six and twenty-six storeys. The illustrative scheme for Plot B appears incongruous with the established scale and experience of the neighbouring Conservation Area and Locally listed Church and school to the southside of Brereton Road and the Design Code for Plot B should accordingly acknowledge both the locally listed buildings along Brereton Road and the Conservation Area boundary so to provide useful design guidance for future detailed applications. Looking at the proposed development scheme in its complexity and richness, it is accepted from the conservation perspective that the built background to the views of the Conservation Area and its heritage buildings as experienced both along Tottenham High Road and along White Hart Lane has been changing over the last decades and will change even more. It is also accepted that a brand new, progressively taller urban development with its markedly contemporary character and architectural language will complement the fruition and experience of the High Road and its Conservation Area, however the TVIA and related AVR and massing model views show that while the illustrative development will generate groups of discretely located, separate, vertical bult elements of various heights which will intrude to various degree in the background of established views form and towards Conservation Areas and heritage	

Stakeholder	Comment	Response
	assets, the potential new development configured according to the proposed maximum parameters would instead appear in most instances as coalescing and overwhelming for the historic built environment in several views into and across the impacted Conservation Areas. This seems one more reason to carefully refine the parameter plans and Design Codes for the proposed development refining the design guidance in relation to heritage assets. The cumulative change introduced by the proposed development, immediately located along and behind the Conservation Area is quantitively and qualitatively different and greater from the impact that the Football Stadium, referred to as comparison term, has had on many heritage assets on the east side of the High Road, and the findings of the Heritage Assessment that there is no harmful impact at all to the significance of any heritage are largely unconvincing. The TVIA comprehensively identifies the heritage assets affected by the proposed development and is informed by 26 accurate visual representations whose viewpoints have been agreed during the preapplication process. The additional non-verified views further inform the assessment of the impact of the Proposed Development on heritage, townscape, and visual receptors. However, Table 2.1 attributes heritage value Criteria which seem to directly depend on the listed grading of heritage assets, which is a different attribute clearly explained in the DCMS grading of heritage assets. Therefore, the visual impact of the proposed development on heritage assets rest on an arguably low value attributed to many heritage assets intended as receptors of the views and on an equally arguable assessment of impact on these heritage assets. It is therefore unconvincing that the proposals will only give rise to some residual, less than substantial harm to nationally important heritage assets such as the North Tottenham CA; Tottenham Cemetery CA; Bruce Castle CA; 819 and 821 High Road N17 (grade II); 7 White Hart Lane (grade II); and 797 and 799 High Road (grade II). The following views show the overwhelming effect of the proposed development on the character and experience of the Conservation Areas and heritage buildings: - View 15: Bruce Castle Park, South of Kings Road, Oriented North-East - View 23: High Road, Oriented North, At Junction Wit H Bromley Road, - View 32: High Road, Opposite Junction Wit H White Hart Lane, Oriented North-West - View 41: High Road North of Brent Wood Road - View 42: Northumberland Park, South of Junction Wit H Bennetts Close - Additional Views in Appendix 1 are very useful to show the negative impact of the proposed development on the Conservation Areas and heritage buildings, especially with maximum parameters: • Views A and B include the locally listed St Francis church • Views C1 and C2 along High Road show a uniform wall of new buildings behind the high road • Views D1 and D2, show massive buildings near Moselle place • Views from E to I all show the overwhelming scale proposed development with the maximum parameters whose effect on the historic context would be seriously negative. Conclusions The proposed scheme offers in principle a positive opportunity for improvement of both the North Tottenham area and the setting of the Conservation Area and its heritage buildings, it is a scheme guided by a thorough urban design exploration, a good contextual analysis and heritage awareness and is fully supported from the conservation standpoint. However, the heritage sensitivities and opportunities disseminated across the site and along the High Road frontage, would benefit from a heritage-led implementation of the proposed parameters as well as requiring more detailed and stringent design guidance for the proposed scheme so to ensure that future detailed	

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	schemes respect and positively respond to neighbouring heritage assets. Plots H, I, G, E, C and B directly impacting on the Conservation Area and on heritage buildings would especially benefit from conservation -led design guidance which should rase awareness on the heritage sensitivities and most suitable development opportunities and should be consistent with the proposed parameter plans. This masterplan will generate a totally new, unprecedented, high rise new urban development which will supersede the Victorian and post-industrial townscape still prevailing in the area. The new development will rise at the centre of North Tottenham side by side with the surviving Conservation Areas, historic buildings, neighbouring parks that characterise the area and its surrounding. This development will significantly change and improve the urban environment of North Tottenham but will also change the immediate surrounding where we experience heritage assets and their views. Even in their illustrative, most heritage-sympathetic configuration the tallest elements of the new development dominate to various degrees in the background of currently undeveloped, or modestly developed, uncluttered open views towards the development site as experienced from various standpoints including Bruce Castle Park, from White Hart Lane, from Northumberland Park and along the High Road. This would lead to a level of harm at the mid-range of 'less than substantial' affecting several designated and undesignated heritage assets and the tests set at paragraphs 196 and 203 of the NPPF will apply.	
Design Officer	**Summary** This is a hugely significant development, and is designed with an ambition to create a new neighbourhood of excellent design and living conditions, supporting a vibrant new town centre that would contribute to changing North Tottenham from a place dominated by the presence of Tottenham Hotspurs Football Club as a disruptive monster descending every 2 weeks on a sleepy, economically deprived suburb, to a town centre where Spurs are a welcome part of a more rounded, vibrant economy and a safer, more pleasant place to live. It is also notable for the ambition of the architecture, with two grand new public spaces, one a green park, the other a civic square, a parade of tall buildings rising toa dramatic pinnacle beside the new station building, and a landmark new home for the local library, expanded into a learning centre, anchoring the opposite side to the stadium in community, to have a woodland climbing over it and to be designed by an open competition. With such ambition comes danger, that the living conditions will not be great, and the spaces between buildings feel oppressive, between such tall buildings and dense blocks. There are refinements and modifications I would still like to see, to the design quality of Plot B, to the precise location of the tall building in Plot F and the precise form of Plot G and the White Hart Lane frontage. But with changes or responses to those points, I am confident this proposal could be well designed, a vibrant and exciting town centre, a pleasant place to live and something of beauty. **Context, & Structure of the Application** 1. High Road West is one of the most significant developments proposed in the whole of Haringey and is of London wide significance, both for the amount of development and number of new houses it should be able to provide and for its potential to transform its location and surrounding neighbourhood, catapulting the centre of North Tottenham, from being a sleepy and poverty stricken neighbourhood with an economy and lifestyle dominated by	Officers are confident that the submitted control documents would provide a high quality mixed use developments that broadly delivers on the AAP and HRWMF vision and principles. The final design will be secured at reserved matters stage which will be subject to further daylight, sunlight, overheating,

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	the shadow of the Spurs Football Stadium, lively only on match days, to a vibrant all-week, mixed economy, better paid town centre. 2. Other developments also contribute to this, particularly the redevelopment of the stadium itself, that has done so much to broaden the offer it provides, with other businesses and much more tourism opportunity in and immediately around the stadium and with a striking, well designed appearance set in well considered, designed and built public spaces, restored buildings of heritage significance and more new development to come. The High Road here also contains a collection of some of the best built heritage in Haringey, including Grade II* Listed Queen Ann and Georgian buildings of national significance and a sense of coherence and enclosure around the wider stretch where Northumberland Park and White Hart Lane meet it, at the heart of the North Tottenham Conservation Area, then compressing at the northern end, forming a townscape gateway to Edmonton, and southern end, a similar gateway to the stadium frontage. Ongoing restoration of significant heritage buildings and shopfronts also contribute to this North Tottenham renaissance. 3. But the High Road West development has the potential to complete and round off the elevation of North Tottenham. It will provide a grand setting to the newly improved and expanded White Hart Lane Station, provide a visible, direct pedestrian route from the station to the stadium that will safely accommodate crowds on match and other event days, yet become a vibrant town square at other hours, accommodating sizable commercial, cultural and community uses, to rival in use and architectural form the stadium and provide the economic functions of a town centre. It will also provide a new park, relieving the northern part of the location of its Open Space Deficiency, and reprovided employment uses in yard spaces suitable for a wide range of knowledge, craft and maker businesses. As well as a lot of new homes. 4. This application is for the bulk of the High Road West Site Allocation, NT5 in the Tottenham Area Action Plan DPD (adopted July 2017) and fulfils all the site allocation requirements and guidelines. To accompany the Site Allocation, a more detailed High Road West Masterplan Framework was prepared by Arups for the Council. The areas within the site allocation not part of this application are some of the properties fronting the High Road, generally those where no redevelopment of existing buildings is envisaged. Nevertheless, the masterplan within this application establishes clear principles for those properties. The proposals within this application also accommodate wholesale those other proposals that had received planning approval recently in the northern half of the site. 5. One small part of the site is a Detailed Planning Application, whilst the rest is in Outline. The detailed part is the only part of the site that is to the west of the overground railway that runs north-south, marking the western boundary of the Outline Site. The Detailed Site, known as Whitehall Mews, and its surrounding residential context, has an urban character and feels very detached from the land to the east of the railway, whilst still having easy connections through two bridges. Therefore, in this document, the Detailed Site is dealt with completely separately, after the Outline Site.	and microclimate assessment as well as design scrutiny and subsequent determination by the Local Planning Authority.

Outline Scheme

Masterplan & Street Layout

6. The Outline Site stretches from Brereton Road at the southern end of the site to the Cannon Road development to the north, with White Hart Lane cutting east-west across the centre of the site. Its western boundary is the raised, London Overground, Liverpool Street to Enfield Town and Broxbourne railway, with White Hart Lane Station immediately south of White Hart Lane itself. North of White Hart Lane there are no bridges over or under the railway until quite a considerable distance north of the site, whilst south of White Hart Lane there is a pedestrian link through within the new station building, and two vehicular streets, Whitehall Street close to the southern edge of the site and Orchard Pace on its southern boundary. The Masterplan Framework asks for provision to be made for a pedestrian bridge in the north-west corner of the site and this application retains provision in the approved scheme for this part of the site.

7. The proposed masterplan would create a series of coherent development blocks that frame existing and new streets, as well as the new urban square. being known as Moselle Square (names to be confirmed, & in all likelihood to be different), at the heart of the southern half of the site and the new park, known as Peacock Park, at the heart of the northern half. These streets are extremely well integrated into surrounding existing streets where they are available; connecting to Cannon Road to the north via the two intended southern links in that development, while to the south, Whitehall Street, Brereton Road and Orchard Place remain in place.

8. The eastern boundary is generally the backs of properties fronting the High Road or of properties accessed from the High Road, with two exceptions, to the north and south. At the southern end, the proposals include new High Road frontage between Brereton Road and Moselle Street, south of the Conservation Area and opposite the new Spurs Stadium, including a new Library and Learning Centre in an architectural landmark to respond in design terms with the stadium. This is an appropriate response to the context of the stadium and acknowledges the completely different urban character to the High Road in front of the stadium compared to the frontage in the Conservation Area. The two shorter sections of High Road frontage at the northern end of the site extend the playground of the school in the Canon Rubber development site, and a small infill where a new east-west street would cross the timber yard site. This and the two existing alleyways off the High Road, Percival Court and Brunswick Square, provide new east-west streets across the northern half of the development, connecting the new housing, workspace and park to the High Road.

Height, including Tall Buildings

9. The heights proposed follow the strategy of the Masterplan Framework, with lower heights compatible with the existing buildings where they are close to the retained buildings of the High Road and White Hart Lane, rising up to tall buildings along the railway edge. However the overall heights are increased, as housing targets and expectations of density have increased, active travel and public transport improvements have been delivered, particularly the new White Hart Lane Station and Cycle Superhighway 1, and other tall buildings in the vicinity have been approved, such as the six tall buildings to the south of the new stadium and Spurs other developments at the “Goods Yard” and “Depot” sites within this site, the designs of which, including their heights are adopted wholesale for the tall buildings proposed north of White Hart Lane.

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	10. The six main proposed tall buildings will form a row, with the existing River Apartments tower just to the north forming a seventh. The plan of each tower is strongly aligned north-south, around 40m wide (north-south), but under 20m deep (east-west), and the illustrative scheme suggests and design code requires they would be offset or chamfered in plan to accentuate their slenderness from the north and south, whilst the gaps between each, including to Rivers Apartments, is each around 30m. This means they should avoid "coalescence"; the effect of views of the towers merging together as they overlap, except in a narrow cone of views from the south-south-west and north-north-east, directions where there happen to be relatively few sensitive viewing points. The main views will be from the High Road to the south and north, Northumberland Park to the east, and from White Hart Lane and Tottenham Cemetery to the west, in all cases from where they will be clearly separated 11. Tall buildings would be embedded within podia and shoulder blocks of their constituent plots and into the street pattern, tying them into the wider grain and mitigating their scale, with the remainder of the plots formed by mansion block scaled blocks of four to ten storeys, yet with gaps providing glimpses and sun and daylight access into podium gardens. 12. Considering each criterion from Haringey's tall building policy is set in SP11 of our Strategic Polices DPD (adopted 2013 (with alterations 2017) and DM6 of our Development Management DPD (adopted 2017), skipping the 3rd & 4th bullets from the Strategic Policies, that reference the other document and the document used in preparing DM6: • The site is within the areas of both the adopted Tottenham AAP and the adopted Masterplan Framework. Both support the principle of tall buildings in this location. The adopted Masterplan Framework established in 2014 a principle that it would be acceptable to have a row of five tall and taller buildings alongside the edge of the railway in the High Road West area of North Tottenham, with the height of those towers dropping away to prevailing existing heights two – four storeys) at White Hart Lane and rising in height north and south. The Masterplan Framework suggested the row of towers north of White Hart Lane should rise to a highest tower at the northern end of the redevelopment area the then Canon Rubber Factory site. As it happened, that site was built out first, being completed in 2015, with its highest block, River Apartments, at 22 storeys. Since then, housing targets, density expectations and public transport accessibility have improved, and it is therefore reasonable for the number and heights to increase; • The council prepared a borough-wide Urban Characterisation Study in 2016, which supported tall buildings in this location, right beside the railway edge, well away from the High Road with its sensitive heritage, dropping in height closer to White Hart Lane. The Characterisation Study recognises that the railway forms a significant barrier and buffer between the two sides, with the west side a much quieter, and therefore lower rise neighbourhood than the east, as well as the railway corridor being at its widest beside this site, giving a much greater distance of 30-70m, with the broad, wooded embankments providing further buffering between the two areas; • High quality design especially of public realm is promised in the Design Code and Illustrative Scheme, but will be considered in detail at Reserved Matters phase. Heritage assets and their settings are covered by the Conservation Officer's comments;	

Stakeholder	Comment	Response
	• They will be capable of being considered "Landmarks" by being wayfinders or markers within the masterplan, marking the station and closing vistas of the east-west streets, the main north-south street, marking the new development with its new park from the south, west and east, and marking White Hart Lane station from the north; • They should also be capable of being considered "Landmarks" by being elegant, well proportioned and visually interesting when viewed from any direction. Aspects of the Design Code on tall buildings also provide assurances that they must be high quality designs, regular form, slender, grounded, with a clear base, middle and top with double height entrances and pronounced features to mark their tops but this will be subject to Reserved Matters application(s); • Consideration of impact on ecology and microclimate encompasses daylight, sunlight and wind, examined in detail below. Impact on ecology could also include impact on the flight of birds and other flying creatures, but this is only likely to be relevant adjacent to open countryside, a large open space or open waterway • The proposed tall buildings will be in *some* proximity to the built River Apartments, but this is by design to produce an intended effect of a row of tall buildings. They will be sufficiently far apart though, at around 30m from each other, and are slender in width east-west, to avoid detrimental effects of proximity and in any case are a line of aligned, north-south proportioned towers; there would be no canyon effect as their short sides would be the ones facing each other; 13. It should be noted that all buildings north of White Hart Lane, to plots J, L & M, are designed currently to be identical to the extant planning permissions for those sites. Nevertheless, *all* the tall buildings in the whole site, in common with all the outline part of the outline part of the development[1], will require Reserved Matters Approval, which will include consideration by the Council's Quality Review Panel as well as the Planning Committee. **<u>Design Code - Form, Elevational Composition and Materiality</u>** 14. The outline part of the site is not detailed with proposed floor plans and elevations, as is to be expected. These will be part of the Reserved Matters applications and will be considered separately by the Quality Review Panel and Committee when the time comes. However, the applicants have prepared a detailed Design Code to control all aspects of the proposals more detailed than street and block pattern and maximum height. This is accompanied by the Illustrative Scheme, which acts as an illustration of one way the development could be detailed, in accordance with the Parameter Plans and Design Codes. 15. The Design Code comprises site-wide coding and plot by plot coding, as well as coding for landscaping. Rules within the design code are all described as "must" where following that rule is mandatory, or "should" where there	

[1] Parts of the detailed planning permissions obtained for The Goods Yard, 867-879 High Road and The Printworks, are detailed planning permissions; namely Plots H1 & 2, K1 & N2 & 4, are detailed planning permission and could be built without further Reserved Matters approval, but none of these contain tall buildings; indeed, they are all characterised by being lower rised. As appropriate to their immediate heritage context close to the rear of the High Road or White Hart Lane.

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	is *some* flexibility, but a strong expectation; unlike most design codes, there are no "may" codes, which strengthens the certainty that the code provides. 16. Site wide codes include important guarantees of quality like active frontages, defining "Primary Frontages" to where blocks face main streets and spaces, including the High Road, White Hart Lane, Moselle Square, Peacock Park and the key streets connecting them together; these should have shop frontages or primary residential entrances, front doors and habitable room windows, should not have refuse stores and must not have plant room doors or car park entrances. Further codes define high quality design approaches to all the required relationships between buildings and streets, including for instance, detailed coding to ensure refuse storage is convenient yet discreet. 17. A series of Architectural and Landscape Codes apply to different character areas of the site, including "Civic" around Moselle Square, "Parkside" around Peacock Park and "Heritage" along the High Road and White Hart Lane and immediately adjacent to significant heritage assets such as The Grange; for these the broad, site-wide materials codes get refined into more specifically appropriate palettes, with masonry, predominantly brick, being the main required building material finish. These codes also define whether balconies should be recessed (such as to the square) or projecting (such as to the park) and that balcony balustrades need to provide privacy and screening to residents' clutter. 18. Detailed codes deal with each plot, so I will comment on each one in turn. Plot A is not included, as that is the detailed part of the scheme. Plots H, J, L, M & N are essentially the same as the permitted schemes for The Goods Yard and The Depot, which I will cover briefly together. **Plot B** • This is probably the trickiest plot in design terms, with a significant height and quantum of development on a small plot. It is less constrained by development around it, but has the tallest building in the development, on Plot D, immediately to its north across the relatively narrow Whitehall Street to its north and the lower rise Plot C to its east, along with the railway to its west and existing buildings outside of the site to the south, but the parameter plans and design code permit and the illustrative scheme suggest a modest odium courtyard enclosed by one tall block, mansion blocks and a small gap to its south east. • In and following recent meetings the applicants have successfully shown it could be reconfigured to open up the podium more to the south and even remove completely the southern side, creating a ground level landscaped space, which would provide better day and sunlight and outlook to the communal amenity space and lower floor flats, but could overshadow Plot D, reduce enclosure and animation from front doors and passive surveillance to the streets to the south, which are currently rather lacking in enclosure and animation, and be contrary to the Design Code. • It is worth pointing out that this block is probably going to be all market sale housing, and that its upper floors will get some of the best light and views. Provided extra effort is taken to ensure the lower mansion block "shoulders" are kept as low as possible, as many as possible are dual aspect and have as generous windows as possible, it should be possible to achieve acceptable living accommodation.	

Stakeholder	Comment	Response
	• Whilst the buildings should be as close to the railway as possible, to maximise the podium space and minimise what is likely to be an ugly, unused, service space at lower levels along the railway edge, it will be important to ensure that any residential units are raised above the level of passing trains before they look out onto the tracks. This would seem to suggest the "service" spaces; bins, bukes, plant etc, might be better stacked up on the lower floors of the tower rather than spread out under a podium. **Plot C** • Further clarification has confirmed that the three north-south blocks of Plot C, and the eastern-most side of Plot B will each be over 20m apart, which should ensure good privacy, day and sunlight. As the east-west winds of this block will be lower rise 4-6 storeys with a landscaped amenity roof garden acting in concert with the landscaped western podium garden and trees in the eastern yard space, they should have a green outlook complimenting the three retained trees on their Brereton Road (south) side, as well as creating a good variety of amenity spaces including childrens playspace. • Provided the Design Code is followed scrupulously, this plot should be capable of providing excellent residential quality suitable of a variety of residents including families and affordable housing tenants, along with business uses in the High Road frontage and yard space, and strong retail / food & beverage uses unto the square & east-west route. **Plot D** • This is the "landmark" plot of the whole southern half of the development, with the tallest tower sitting beside and marking the White Hart Lane Station end of the route from the stadium and acting as a marker for the station and Moselle Square, particularly in longer views from the west. For this reason, this tower is proposed to have a unique "Feature Building" architectural approach. It *should* be the tallest building in the development, and it could be a good idea to also procure its detailed design via an architectural competition, as is proposed for Plot E. • Nevertheless, the same comments made for the lower floors of the tall building in Plot B, against the railway edge, apply, with the danger of dead space against the railway edge being particularly relevant since this is proposed to house an energy centre. However the 2nd floor podium is sufficiently open, particularly to the south, but also with an attractive slot providing a glimpse / lookout to the station frontage to the north, to promise good quality private amenity space, including children's play space, and day and sunlight. **Plot E** • This is the other "landmark", a low-rise landmark that fills the gap between the Moselle Square and the High Road without hiding the view through, over and past it, from the station to the stadium and vice versa. It is also proposed to have public functions within and publicly accessible landscaping stepping up from the square over its roof, providing a vantage point view. • Nevertheless, this amounts to a particularly tricky design conundrum; a single-use singular building, with active frontage on all sides and no particular back, that must address the square yet hold the High Road	

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	frontage as part of the continuous historic high road, repairing the gap potentially opened up by loosing the existing “not bad – if unexceptional” terrace on this site, a gap already created by the stadium opposite, a monumental landmark building, against which, despite being smaller, this needs to architecturally compete! Hence it is evident that the proposed open architectural competition is necessary and vital to secure the exceptional design quality such a significant and tricky brief requires. • Securing a reputable competition is essential, and the competition should be organised and administered by a reputable independent expert company or organisation such as RIBA Competitions (link to website) or Malcolm Reading Consultants (also a link). The correct balance between securing national and international interest in the competition with ensuring participants are grounded and connected to the local community, along with ensuring appropriate resourcing and timescale is provided, should be decided on the advice of the specialist consultants, and in accordance with recommendations in the RIBA Competitions Guidance for Clients. Buy in from the local community should also be secured by involvement in the brief writing, but it would be important to ensure that the judging be primarily by independent, expert design professionals. Timing could also be tricky given the need to presumably provide Plot E, completed, before the existing library on the neighbouring Plot C. But above all, it is essential for the exceptional quality of design required here, to secure and guarantee a competition, with integrity. **Plot F** • This is a large plot, that is expected to house one of the taller buildings in the development, in its north-western side or corner, along with another semi-tall building addressing the square. However, the proposals are generally pretty sound and logical from a design point of view, except in the one crucial aspect of the precise location of the tallest building. The block facing the square, with its civic character and two floors of active town centre-retail use promises to animate this most important side of the square, and the generous two storey high podium, with gaps providing glimpses in and out, its lower shoulder to the south-west permitting day and sunlight in, promises to support excellent residential accommodation for a range of residents. • The tall building is, however, something of a concern, for its impact directly onto White Hart Lane, as proposed in the illustrative scheme, right on the north-western corner of this plot. The scale difference of such a tall block with no mitigating step in scale to the low-rise buildings, many of heritage significance, and picturesque space of White Hart Lane, curving gently and on this south side tree-lined, seems very harsh. In recent discussions, the applicants have shown us variations within the parameter plans and design code that would push the tower slightly south, closer to the station, with its civic function and wider forecourt a compatible neighbour to tall buildings, and with a moderating 10 or so storey shoulder to White Hart Lane, which would be preferable in design terms. **Plot G** • This modest plot has nevertheless proved problematic, but that is partly because greater detail has gone into this, with the applicants having started its pre-application discussion son the reserved matters, albeit that these are far from compete. The illustrative scheme shows a symmetrical, four-square, six storey building. It	

Stakeholder	Comment	Response
	is correct that it should close the vista of the street proposed to be heading north opposite this building, but it must equally turn the corner within its own plot, to its west, from White Hart Lane into William Street, which will lead through to Moselle Square, whilst it also needs to step down towards the 2 storey height of the neighbouring Listed Georgian building to its east. • The design code correctly states it must be no more than 3 storeys adjacent to the Listed Building, which would seem to contradict the illustrative scheme and parameter plans. In recent discussions the applicants have shown us what would be a far more preferable model for this site's development, as a building that steps up from 3 to 6 and 7; this would respond better to the Listed context and to the street corner, whilst it could still acknowledge the vista to its north in its entrance location. • The stepping façade could also continue as 9 and 10 storey steps in Plot F as modified as discussed above, which would provide much greater coherence to the whole south-side-of White Hart Lane frontage, complementary to the Conservation Area and Listed Buildings opposite and with a sense of movement along this major street, progressively, gently rising to the key turning to the station at its western end. **North of White Hart Lane Plots H & I)** • These are really three plots, rather than two. Blocks H 1 and 2 form a plot with the retained Station Masters House that essentially adopts wholesale the approved scheme for The Goods Yard, which is accepted. • H3 and I1 form a plot with the retained The Grange Listed Building. The design code is strict for these, but they must be very respectful of The Grange, in height, elevational treatment, proportions of fenestration and materials. • Blocks I2 and 3 form a plot with the retained no. 6a White hart Lane, a very modest 2 storey house, and with The Chapel, both or heritage significance. The entire block is completed by further buildings on White Hart Lane up to the corner of the High Road, and along the High Road, all outside the boundary of this site, as far as Percival Court, a narrow alleyway that forms its northern edge, with its western edge being that important new street north from White Hart Lane to Peacock Park. As a Back-of-High Road yard space, this is intended to house employment uses in the yard space, perhaps with residential above but as the proposed height of thee is never more than 4 storeys and they will have to step down to all the retained buildings there is not likely to be much accommodation in this plot. • Nevertheless, I2/3/etc is worryingly ambiguous in its front and back relationships; it will be necessary to achieve active frontage to the new street to the west as well as to Percival Court to the north, especially as the chapel and its attached Former Pastor's House line up with both those streets but appear to not have any active frontage to those sides. **Plots to the North** • Most of the rest of the plots to the north have planning permission over a large part of them, from the "Goods Yard" "Printworks" & 867-879 High Road (aka "The Depot") permissions, which have been adopted whole, and leave nothing to be said. They should, importantly contribute significantly to the provision of the park,	

Stakeholder	Comment	Response
	and given that mot of this application site north of White Hart Lane is in a designated area of Open Space Deficiency, it is important that it is delivered early. • Two exceptions remain. One comprises J2, L2 and M3 and form the western side of Peacock Park. These are simple, straightforward, residential mansion blocks facing the park and are unproblematic in design. The other is K3, which includes a new street through the existing timberyard site from the High Road to the park, and the blocks either side. This street is considered essential as part of the masterplan and site allocation objective of creating east-west streets, and would be, in this approximate location, roughly evenly spaced between Brunswick Square and the continuation of Brantwood Road, with Percival Court and White Hart Lane similarly spaced. • I am also convinced that this street need not be particularly wide, and should have a great deal in common with Percival Court and Brunswick Square, as streets with very narrow, pedestrian only (& possibly cycle) constricted throats onto the High Road and an alleyway character that when the two existing examples have been cleaned up, resurfaced and enlivened with a couple of attractive new buildings, could be streets of considerable charm and appeal, complimenting and strengthening the Conservation Area. All three are noted as being intended for pedestrian priority, not for motor vehicles generally except for very occasional servicing • However, the applicants' illustrative scheme is here somewhat vague, albeit that the Design Code is definitive. This may reflect that there is potential for considerable adjustment as more is discovered about the site before a Reserved Matters application. The Design Code seems to be as clear and definitive as possible to preserved design quality for this site. **<u>Residential Quality (Aspect, Daylight, Sunlight and Wind Microclimate)</u>** 19. Residential quality will be mostly decided when Reserved Matters applications are made for each plot. It is not possible to make any judgements on flat or room sizes or on private amenity space at this stage. There is indicative indication in the Design & Access Statement (p82) and Illustrative Scheme drawings that the number of flats per floor per core should not ever need to exceed eight, and would normally be well below that, which is welcomed. 20. The same drawings show how the applicants have been able to demonstrate that layouts could be provided that minimise single aspect homes, avoiding completely single aspect north facing homes, very few single aspect south facing homes, and that blocks can be positioned sufficient distances apart or off-set from each other that residents will benefit from privacy from neighbours. 21. The applicants provided Daylight and Sunlight Reports on levels within their development and the effect of their proposals on relevant neighbouring buildings, prepared in accordance with council policy following the methods explained in the Building Research Establishment's publication "Site Layout Planning for Daylight and Sunlight – A Guide to Good Practice" (2nd Edition, Littlefair, 2011), known as "The BRE Guide". 22. In the case of higher density developments, it should be noted that the BRE Guide itself states that it is written with low density, suburban patterns of development in mind and should not be slavishly applied to more urban locations; as in London, the Mayor of London's Housing SPG acknowledges. In particular, the 27% Vertical Sky	

Stakeholder	Comment	Response
	Component (VSC) recommended guideline is based on a low density suburban housing model and in an urban environment it is recognised that VSC values in excess of 20% are considered as reasonably good, and that VSC values in the mid-teens are deemed acceptable. 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. Therefore, full or near full compliance with the BRE Guide is not to be expected. 23. Their assessment finds the proposed outline scheme can achieve good levels of daylight and sunlight to most floors, but that it will be more difficult to achieve in many of the lower floors of the outline proposals. For instance, 87% of the facades on Plot B, 81% on Plot C, 83% on Plot D and 93% on Plot F would receive 15% VSC or better. Approximately 67% of each plot will meet or exceed BRE Guide recommended sunlight. Nevertheless, these are only assessments of the facades of proposed blocks, not actual window positions; as part of detailed designs, by making windows larger, varying heights and block profiles, changing flat layouts etc.. 24. For open spaces, their assessment finds that 54% of Moselle Square and all of Peacock Park would receive at least 2 hours of sunlight on a sunny equinox day (50% is the BRE Guide recommendation). All the podium and roof garden spaces pass except that on Plot D, but the courtyard spaces to the approved Goods Yard scheme do not. Their consultants note that it should be possible to design the amenity areas so that features that have higher dependency on sunlight such as play space and seating are positioned to receive sunlight 25. The assessment on neighbours finds a range of effects, with most existing residential neighbours not being adversely affected or only to a minor degree, but some close neighbours being significantly affected. The most dramatically affected are a group of homes to the rear of 841 High Road, that were converted from business units without planning permission, to subsequently gain a certificate of lawful development on time grounds. It is also worth noting that, at present, most of the neighbours benefit from the site being unusually under developed, with low rise warehouse units and extensive surface car parking. 26. To assess the impact of the proposals on wind microclimate, the applicants carried out wind tunnel testing of a physical model and measured the findings against long term wind statistics applicable to the site, in accordance with the industry standard “Lawson” criteria. Their assessment finds that the proposed towers will cause some downdrafts and tunnelling of wind in some street spaces along the western side of the site. Following some mitigations and design modifications, the locations of potentially uncomfortable wind conditions were found to be reduced to just a few places where sitting would be uncomfortable but strolling fine. Nevertheless, the applicants’ stated intention is that further mitigation as part of detailed landscape proposals should iron out any remaining concern. **<u>Detailed Scheme</u>** 27. The detailed scheme comprises just two blocks, in Plot A, which is to the west of the railway, on the site of two former community buildings. They are connected to the rest of High Road West via two railway bridges, on Whitehall Street and Orchard Place (which connects to Brereton Road), north and south respectively of Plot B, but the proposed blocks would be closer to Plot D. The immediate context to the west is existing two and three	

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	storey council housing in Tenterden Road, Headcorn Road and Penshurst Road, a series of quiet culs-de-sac, with a square green space also immediately adjacent. 28. The proposals are of five and six storeys, in brick in an understated but elegant architecture with regular pattern of windows of a vertical proportion, interspersed with columns of balconies. To the eastern of the two blocks, there will be two storey maisonettes on the ground and first floor, with their own front doors and private back gardens. The end unit would be entered off the south facing flank wall onto the existing Whitehall Street, the remainder onto the new pedestrianised and lushly landscaped Whitehall Mews, between this block, the other block and the flank and of the existing housing. Two communal entrances to the flats above would also face this space, whilst at the northern end the terrace is closed with a secure cycle store. 29. The western of the two blocks is on the opposite side of Whitehall Mews, shifted south, and L-shaped in plan, with its entrance facing down Whitehall Street. It contains flats on each floor. Both blocks' communal entrances are celebrated with pigmented concrete "frame" encompassing entrance door, glazing to the entrance hall and solid, painted refuse / cycle store doors. The entrance frame to the western block turns the corner providing more passive surveillance to Whitehall Mews. Dark glazed bricks separate entrance door / windows from utility doors, and a darker red brick is used to the base of the eastern block, around doors and to end flank elevations to the softer pink primary brick. Balconies are thoughtfully detailed in brick, concrete and metal, referencing the traditional pot designs produced in this area. 30. All flats are dual aspect except for 1-bedroom flats, which face either east or west; the majority of flats are two or three beds, with three and four bed maisonettes. The applicants sun and daylight consultants prepared a full assessment of the detailed development, finding that 91% of proposed rooms, 95% of proposed living rooms, would receive at least the BRE recommended daylight levels. Given the expectations in denser urban developments mentioned above, this is considered an excellent outcome. Sunlight levels are not so successful, 57% receiving recommended annual levels but 95% receiving recommended winter levels. The applicants' consultants suggest these results could be due to the orientation being east-west, but these results can still be considered good in a dense urban setting. The effect of the proposals on neighbours is affected by many of those neighbours having windows that are already significantly overshadowed by balconies, so that their existing day and sunlight levels are poor, and following the development they would be worse. Presumably residents of those homes have learnt not to have a great expectation of daylight form already overshadowed windows. Generally, windows that are not overshadowed do not suffer a significant, or in many cases any noticeable loss of day or sunlight. 31. These two blocks are modest but elegantly designed, and form an appropriate transition between the high-density, high-rise urban density and intensity of the rest of High Road West (& indeed other developments beyond, particularly the Spurs Stadium) and the modest, sleepy character and lower rise, scattered layout existing housing to the west of the railway. Details are thoughtful and materials robust, durable, and attractive. The detailed scheme will only give a hint as to what the rest of the scheme, in outline, could be, but if it is a marker for what is to come, it is a promising marker.	

Stakeholder	Comment	Response
Drainage	Thank you for consulting us on the above planning application reference number HGY / 2021 / 3175, which is a Hybrid Planning application seeking permission for : Outline component comprising the demolition of existing buildings and for the creation of a new mixed use development including residential (Use Class C3), commercial, business and service (Use Class E), leisure (Use Class E), community uses (Use Class F1/F2) and Sui Generis uses together with the creation of a new public square, park and associated access, parking and public realm works with matters of layout, scale, appearance, landscaping and access within the site reserved for subsequent approval and 2) Detailed component comprising Plot A including the demolition of existing buildings and the creation of new residential floorspace (Use Class C3) together with landscaping, parking and other associated works. Having reviewed the applicant's submitted Masterplan Flood Risk Assessment document parts 1 to 9, prepared for Lendlease (High Road West) Limited by Robert Bird Group dated October 2021, please see below our comments : 1) For the Outline component of the application: We would like to propose a couple of conditions relates to the Surface water Drainage and it's management and maintenance, which will need to be attached as a part of any consent on this planning application. Please see below some wording for Conditions. Surface Water Drainage condition: No development shall take place until a detailed Surface Water Drainage scheme for site including overland flow path and final detailed design drainage drawings has been submitted and approved in writing by the Local Planning Authority. The development shall not be occupied until the Sustainable Drainage Scheme for the site has been completed in accordance with the approved details and thereafter retained. Reason: To endure that the principles of Sustainable Drainage are incorporated into this proposal and maintained thereafter. Management and Maintenance condition: Prior to occupation of any blocks hereby approved, a detailed management maintenance plan for the lifetime of the development, which shall include arrangements for adoption by an appropriate public body or statutory undertaker, management by Residents management company or other arrangements to secure the operation of the drainage 2 scheme throughout the lifetime of the development. The Management Maintenance Schedule shall be constructed in accordance with the approved details and thereafter retained. REASON: To prevent increased risk of flooding to improve water quality and amenity to ensure future maintenance of the surface water drainage system.	Conditions are recommended to secure the final drainage and maintenance arrangements.

Stakeholder	Comment	Response
	2) For the detailed component comprising Plot A With regards to the information as submitted for Plot A specifically, if the scheme is to built as per the submitted FRA, calculations, drawings, management and maintenance plan then we are content with the same and we have no further comments to make on the application for Plot A.	
Education	I don't have any particular comments from a place planning perspective at this stage. We have 5 primary schools in close proximity to the Love Lane estate with large surpluses and our annual place planning projections from the GLA take into account future housing trajectories.	Officers are satisfied that the proposal would not have an adverse impact on education provision.
Ecology	No comment received	
Planning Policy	Location: 867-879 High Road N17 8EY Proposal: Hybrid planning application (part Full/Part Outline) for the demolition of existing buildings & structures and redevelopment of the site for a residential led mixed use scheme with up to 330 residential units (class C3), retail/cafe use (Use Class A1/A3), area of new public open space, landscaping and other associated works. Full details/permission is sought in respect of Block D, 867 and 869 High Road (Grade II listed) and proposed Block G to its rear. Outline permission is sought for the remainder of the site, with details of ""scale"", ""layout"", ""appearance"" and ""landscaping"" reserved in relation to proposed Blocks A, B and C and details of ""appearance"" and ""landscaping"" only reserved in relation to Block E. Key designations • Tottenham Area Action Plan • Northumberland Park Growth Area • High Road West Site Allocation (Reference: NT5) • North Tottenham, Conservation Area (part) • Archaeological Priority Area (part) • Listed Buildings • Tall Building Growth Area • Ecological Corridor (part) Site and Proposal The site is located at 867-879 High Road. The proposal is for the redevelopment of the site for a residential led mixed use development scheme with up to 330 residential units, retail/café, area of public open space, and other associated works. Detailed permission is sought for Blocks D and G. change of use at 867 and 869 High Road (Block F), and outline permission is sought for remainder.	Officers are satisfied that the proposal delivers on the vision and aspiration and key principles, when read as a whole. The limited departures are considered to be justified and outweighed by the significant public benefits that the scheme delivers including but not limited to new housing (including affordable housing, substantial,

Stakeholder	Comment	Response
	Principle of development The site is located within the Lea Valley Opportunity Area and North Tottenham Growth Area. Policy SP1 of the Local Plan Strategic Policies document sets out that the Council will promote development within the North Tottenham Growth Area. Haringey's Growth Areas are areas with the greatest capacity for growth and it is expected that the majority of homes, jobs and infrastructure will be delivered in these areas over the plan period. The Tottenham Area Action Plan (AAP) gives effect to the Council's spatial strategy for Tottenham by identifying and allocating development sites. The site falls within the High Road West site allocation (reference NT5). The allocation covers the High Road West regeneration area of which 867-879 High Road is just a relatively small part. The allocation is expected to deliver a new residential neighbourhood and a new leisure destination for London comprising 1,200 new residential units (net). The Council adopted the High Road West Masterplan Framework in December 2014. In advance of the Tottenham AAP being finalised, this set out key principles for the redevelopment and regeneration of High Road West. 867-879 High Road is located within the northern part of High Road West which is identified for a new residential neighbourhood (Peacock Gardens) set around a large new community park. The proposal seeks to deliver a residential led mixed use development scheme with up to 330 residential units and small retail/café unit. It will involve the loss of circa 5000sqm retail floorspace, however the existing retail use is within an out of centre location and does not have specific policy protection. The residential led mixed use development of the site generally accords with the Local Plan Strategic Policies document, Tottenham AAP and High Road West Masterplan and the principle of the proposal is therefore considered acceptable. Masterplanning Policy AAP1 of the Tottenham Area Action Plan expects all development proposals in the AAP area to come forward comprehensively to meet the wider objectives of the AAP. To ensure comprehensive and coordinated development is achieved, a masterplan will be required to accompany development proposals which form part of a Site Allocation. The Council adopted a comprehensive Masterplan Framework for the High Road West in 2014. It is not necessary therefore for the application to be accompanied by a masterplan, instead the application should accord with the principles within the Council's approved masterplan. The Tottenham High Road Masterplan framework envisages the creation of a new residential neighbourhood in the northern part of the High Road West area. The land uses proposed at the site (867-879 High Road) accord with the masterplan framework and in general terms will support the creation of such a neighbourhood. Detailed consideration will need to be given to the layout of development and vehicular, cycle and pedestrian routes to ensure that the regeneration opportunity is optimised and that the site integrates well with other sites which have already come forward (to the north) or are expected to come forward in the remainder of the plan period (to the south).	public realm improvements, new access routes, new civic square, new public park, new employment and training opportunities and new community infrastructure.

Stakeholder	Comment	Response
	Quantum of development Policy SP1 of the Local Plan Strategic Policies document states that the Council expects development in Growth Areas to maximise site opportunities. The High Road West site allocation does not specify how many dwellings should be delivered at 867-879 High Road rather the site is expected to contribute to the overall target of 1,200 net residential units within the wider allocation. Policy SP2 of the Local Plan Strategic Policies document sets out that high quality new residential development in Haringey will be provided by ensuring that new development, amongst other things, meets the density levels set out in the Density Matrix of the London Plan. In December 2019 the Mayor published his Intend to Publish version of the new London Plan. This has been subject to examination and includes changes in response to the Inspectors' recommendations. It moves away from the use of a density matrix to a more holistic approach to making the best use of land and achieving sustainable densities. Regard should be had to policy D3 of the Intend to Publish London Plan when assessing the quantum of proposed development on the site. Policy D3 seeks to optimise site capacity through a design-led approach. This approach is consistent with policy DM11 of the Council's Development Management DPD which expects optimum housing potential of a site to be determined through a rigorous design-led approach. Mix of housing Policy DM11 of the Development Management DPD requires that proposals for new residential development should provide a mix of housing. The application documentation indicates that only 14% of homes would be 3+ bed units. Consideration should be given as to whether it would be appropriate for the scheme to deliver more family sized housing as the proposed amount is low. Affordable Housing The proposal provides 25% affordable housing by habitable room. An affordable housing viability appraisal has been provided to justify this level of provision which is short of the borough wide affordable housing target of 40% set out in Policy SP2 of the Local Plan Strategic Policies document. The viability appraisal should be scrutinised to ensure that the level proposed is the maximum reasonable amount of affordable housing provision. The Council's Housing team should be consulted in relation to the proposed tenure mix. Transport & Access We note that detailed comments have been provided by the Transport team in connection with the application. It is important that the access and movement proposals support comprehensive development across the High Road West allocation. Parameter Plan 05 addresses potential future accesses to the site from the south. It should be demonstrated that these are deliverable and will facilitate the connections envisaged in the High Road West Masterplan Framework.	

Stakeholder	Comment	Response
	Tall building It is noted that a tall building is proposed within the site. Only outline planning permission is sought for the tall building as part of this application. North Tottenham has been identified as being potentially suitable for the delivery of tall buildings as set out on Figure 2.2 of the Development Management DPD. Regard should be had to policy AAP6 of the Tottenham Area Action Plan and policies DM1 and DM6 of the Development Management DPD when deciding if the proposed tall building is appropriate in this location. Heritage The south eastern corner of the site falls within the North Tottenham Conservation Area. The part of the site falling within the Conservation Area contains a Grade II Listed Building (867-869 High Road). The proposal retains the Listed Building and seeks to convert it to residential use. The retention of the Listed Building is supported. Policy AAP8 of the Tottenham Area Action Plan sets out that the Council will encourage heritage-led regeneration and development on Tottenham High Road. Policy DM9 sets out development that conserves and enhance the significance of a heritage asset and its setting will be supported. The Council's Conservation Team should be consulted to ensure that the proposals will not have an unsatisfactory impact on the historic environment.	
Pollution Team	Thanks for contacting the Carbon Management Team (Pollution) regarding the above hybrid planning application for outline component comprising demolition of existing buildings and creation of new mixed- use development including residential (Use Class C3), commercial, business & service (Use Class E), leisure (Use Class E), community uses (Use Class F1/F2), and Sui Generis uses together with creation of new public square, park & associated access, parking, and public realm works with matters of layout, scale, appearance, landscaping, and access within the site reserved for subsequent approval; and Detailedcomponent comprising Plot A including demolition of existing buildings and creation of new residential floorspace (Use Class C3) together with landscaping, parking, and other associated works and I will like to comment as follows. Having considered all the relevant supportive information especially the Construction Environmental Management Plan dated October 2021, Energy & Sustainability Statement dated October 2021 taken note of section 5 (Silverside Energy Statement), Geotechnical and Geo-Environmental Desk Study with reference4200 – RBG – ZZ – RP – GE – 00001 Revision P04 prepared by RBG Ltd dated 8th October 2021 taken noteof Table 6.3 (Preliminary Conceptual Site Model (CSM)), sections 4 (Ground Conditions), 5 (Preliminary Contaminations Assessment) and 7 (Recommendations), Geotechnical and Geo-Environmental Desk StudyReport with reference 4202 – RBG – ZZ – ZZ – RP – GE – 001 Revision P03 also prepared by RBG Ltd dated 20th October 2021 taken note of Tables 13 & 14 (Preliminary Conceptual Site Model) for North and South Zone respectively, sections 7 (Ground Conditions & Environmental Setting), 8 (Preliminary Contamination Assessment), 10 (Hazard Register) and 11 (Conclusions) as well as Environmental StatementVol 4 CH07 Air Quality which we consider insufficient in addressing the details AQ concern as advised in our email dated 18th June, 2021 @ 1921hr, **please be advise that we have no objection to the proposed development**	Conditions are proposed to secure further contaminated land and air quality assessment and associated mitigation, construction and environmental management plans and CHP details.

Stakeholder	Comment	Response
	in respect to air quality and land contamination but the following planning conditions and informative are recommend should planning permission be granted. **1. <u>Land Contamination</u>** Before development commences other than for investigative work: **a.** Using the information already submitted in the Geotechnical and Geo-Environmental Desk Study reports above, chemical analyses on samples of the near surface soil in order to determine whether any contaminants are present and to provide an assessment of classification for waste disposal purposes shall be conducted. The site investigation must becomprehensive enough to enable; a risk assessment to be undertaken, refinement of the Conceptual Model, and the development of a Method Statement detailing any additional remediation requirements where necessary. **b.** The risk assessment and refined Conceptual Model shall be submitted, along with the site investigation report, to the Local Planning Authority which shall be submitted to, and approved in writing by, the Local Planning Authority prior to that remediation being carriedout on site. **c.** Where remediation of contamination on the site is required, completion of the remediationdetailed in the method statement shall be carried out and; **d.** 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. **<u>Reason:</u>** To ensure the development can be implemented and occupied with adequate regard forenvironmental and public safety. **2. <u>Unexpected Contamination</u>** If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until a remediation strategy detailing how this contamination will be dealt with has been submitted to and approved in writing by the Local Planning Authority. The remediation strategy shall be implemented asapproved. **<u>Reasons:</u>** To ensure that the development is not put at unacceptable risk from, or adversely affected by, unacceptable levels water pollution from previously unidentified contamination sources at the developmentsite in line with paragraph 109 of the National Planning Policy Framework. **3. <u>NRMM</u>** **a.** 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 IIIB 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	

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	submitted to the Local Planning Authority prior tothe commencement of any works on site. **b.** An inventory of all NRMM must be kept on site during the course of the demolitions, site preparationand 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 untildevelopment completion. **Reason:** To protect local air quality and comply with Policy 7.14 of the London Plan and the GLA NRMMLEZ **4. Demolition/Construction Environmental Management Plans** **a.** Demolition works shall not commence within the development until a Demolition Environmental Management Plan (DEMP) has been submitted to and approved in writing by the local planningauthority whilst **b.** Development shall not commence (other than demolition) until a Construction Environmental Management Plan (CEMP) has been submitted to and approved in writing by the local planning authority. The following applies to both Parts a and b above: a) The DEMP/CEMP shall include a Construction Logistics Plan (CLP) and Air Quality and Dust Management Plan (AQDMP). b) The DEMP/CEMP shall provide details of how demolition/construction works are to be undertaken respectively and shall include: i. A construction method statement which identifies the stages and details how works will be undertaken; ii. Details of working hours, which unless otherwise agreed with the Local Planning Authority shall be limitedto 08.00 to 18.00 Monday to Friday and 08.00 to 13.00 on Saturdays; iii. Details of plant and machinery to be used during demolition/construction works; iv. Details of an Unexploded Ordnance Survey; v. Details of the waste management strategy; vi. Details of community engagement arrangements; vii. Details of any acoustic hoarding; viii. A temporary drainage strategy and performance specification to control surface water runoff and Pollution Prevention Plan (in accordance with Environment Agency guidance); ix. Details of external lighting; and, x. Details of any other standard environmental management and control measures to be implemented. c) The CLP will be in accordance with Transport for London's Construction Logistics Plan Guidance (July2017) and shall provide details on: i. Monitoring and joint working arrangements, where appropriate; ii. Site access and car parking arrangements;	

Stakeholder	Comment	Response
	iii. Delivery booking systems; iv. Agreed routes to/from the Plot; v. Timing of deliveries to and removals from the Plot (to avoid peak times, as agreed with Highways Authority, 07.00 to 9.00 and 16.00 to 18.00, where possible); and vi. Travel plans for staff/personnel involved in demolition/construction works to detail the measures to encourage sustainable travel to the Plot during the demolition/construction phase; and vii. Joint arrangements with neighbouring developers for staff parking, Lorry Parking and consolidation offacilities such as concrete batching. d) The AQDMP will be in accordance with the Greater London Authority SPG Dust and Emissions Control(2014) and shall include: i. Mitigation measures to manage and minimise demolition/construction dust emissions during works; ii. Details confirming the Plot has been registered at http://nrmm.london; iii. Evidence of Non-Road Mobile Machinery (NRMM) and plant registration shall be available on site in theevent of Local Authority Inspection; iv. An inventory of NRMM currently on site (machinery should be regularly serviced, and service logs kepton site, which includes proof of emission limits for equipment for inspection); v. A Dust Risk Assessment for the works; and vi. Lorry Parking, in joint arrangement where appropriate. **The development shall be carried out in accordance with the approved details. Additionally, the site or Contractor Company must be registered with the Considerate Constructors Scheme. Proof of registration must be sent to the Local Planning Authority prior to any works being carried out.** **Reason:** To safeguard residential amenity, reduce congestion and mitigate obstruction to the flow of traffic,protect air quality and the amenity of the locality." **5. Air Quality Assessment** In other to minimise increased exposure to existing poor air quality and make provision to address local problems of air quality (particularly within Air Quality Management Areas (AQMAs) where development islikely to be used by large numbers of those particularly vulnerable to poor air quality, such as children or older people), • An Air Quality Neutral Assessment, taking into account emissions from the installation of temporaryand permanent boilers, transport sources and all other sources of emissions must be undertaken and submitted for approval. • Otherwise, the applicant will need to provide us a current addendum AQ assessment of the proposed development taken into consideration all emission sources for the purposes of reaching aconclusion on its significance effects on local air quality. **Reason:** To Comply with Policy 7.14 of the London Plan and the GLA SPG Sustainable Design andConstruction.	

Stakeholder	Comment	Response
	6. <u>Combined Heat and Power (CHP) Facility</u> Prior to the commencement of the development, details of the Combined Heat and Power (CHP) facility ofthe energy centre and associated infrastructure shall be submitted in writing to and for approval by the Local Planning Authority. The details shall include: a) location of the energy centre; b) specification of equipment; c) flue arrangement; d) operation/management strategy; and e) the method of how the facility and infrastructure shall be designed to allow for the future connectionto any neighbouring heating network (including the proposed connectivity location, punch points through structure and route of the link) f) details of CHP engine efficiency The Combined Heat and Power facility and infrastructure shall be constructed in accordance with the details approved, installed and operational prior to the first occupation of the development and shall bemaintained as such thereafter. **<u>Reason:</u>** To ensure the facility and associated infrastructure are provided and so that it is designed in amanner which allows for the future connection to a district system. **1. <u>Combustion and Energy Plant</u>** Prior to installation, details of the gas boilers to be provided for space heating and domestic hot watershould be forwarded to the Local Planning Authority. The boilers to be provided for space heating anddomestic hot water shall have dry NOx emissions not exceeding 40 mg/kWh (0%). **<u>Reason</u>**: As required by The London Plan Policy 7.14. **<u>Informative</u>**: 1. Prior to demolition or any construction work of the existing buildings, an asbestos survey should becarried 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.	
Regeneration	1. INTRODUCTION 1.1 The delivery of the High Road West scheme provides the Council with the opportunity to tackle the entrenched social and economic barriers that residents face in North Tottenham and deliver on the benefits the community have said they want, such as good quality affordable homes, jobs and training and new and improved community	Regeneration benefits are noted.

Stakeholder	Comment	Response
	and leisure facilities. Delivery of the scheme would represent a significant step forward in progressing the Council's and the community's ambition to ensure that north Tottenham is a fairer, healthier place where all our residents can thrive. An increase in council owned social rent homes alongside a suite of other benefits that would be delivered as a result of approving this planning application would ensure that our residents and businesses are given the support and capacity to grow. 1.2 The scheme represents a substantial and far-reaching investment, which includes delivery of the following benefits:- • Over 2,500 high-quality, sustainable homes, including 500 council owned social rent homes and 40% affordable housing. • £10m of funding for social and economic support for both businesses and residents, ensuring the local community benefit from the Scheme • A cutting edge new Library and Learning Centre and a refurbished Grange Community Hub which will provide improved community facilities early in the Scheme. • Around 143,000sqft of green spaces for the community including a large new community park with an outdoor gym, children's play area and Grange Gardens: a safe, central green space for local people. • A welcoming new civic square which will be an important focus of local events and activities, bringing the community together, promoting cultural activities and enhancing activity and safety at night. • Over 130,000sqft of commercial, retail and leisure space throughout the Scheme providing a wide range of leisure, employment space, shops, cafes and restaurants around a new civic square. • £500k of investment in the town centre and a £500k fund for events and activities, as well as meanwhile uses which will revitalise the local centre during construction and afterwards. • Over 3,300 construction jobs and more than 500 end-user jobs once the development is complete. 2. BACKGROUND AND ENHANCEMENT OF THE SCHEME TO RESPOND TO LOCAL NEEDS 2.1 The Council's Borough Plan Priority 1 "Housing", is for a "safe, stable and affordable home for everyone, whatever their circumstances" and states that an increasing supply of council housing is one of the most important things the council can do, "because for many people, a council home offers the only real chance of putting roots in Haringey in a stable, good-quality home". 2.2 North Tottenham is home to a large proportion of families with children; making up 51% of households in the area, compared to 35% borough wide; and with 32.0% of children living in poverty, more than 50% higher than the London average. But there is a deficit of family housing, with fewer than 14% of council owned properties	

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	in Haringey providing three or more bedrooms. Overcrowding is particularly acute in Tottenham, with the Children's Commissioner and Public Health England both highlighting the negative impacts this has on physical and mental health, particularly for children and young people, an issue that has been exacerbated during the Covid crisis. 2.3 The Council has established its own council house building programme to support its Priority 1 Objective. This programme seeks to secure council owned housing by a range of methods including; acquiring homes, acquiring stalled sites and building council housing. The High Road West Scheme represents an important contribution to the Council priority by delivering 500 social rent homes for acquisition by the Council. 2.4 The High Road West masterplan framework was agreed by the Council's Cabinet in 2014, following three years of engagement and consultation with the local community. In 2018 the Council sought a review of the High Road West Scheme, with the view to seeking to deliver more social housing through the Scheme and delivering a higher overall percentage of affordable homes. The outcome of this review included an uplift to 500 council owned social rent homes as well as a higher percentage of affordable homes (40% from 30%), and a range of other community benefits as referred to above, supported by a total funding package agreed with the GLA of £91,512,000 comprising of £70,312,000 of Affordable Housing Grant and £21,200,000 of Mayor's Land Funding. 2.5 The delivery of 500 new council owned social rented homes through the Scheme, offers a chance to increase the number of council owned social rented homes in the area and ensure the mix of the new homes reflects the needs of residents who will be moving into them. Eligible residents on the Love Lane Estate, including those currently living in both secure and temporary accommodation, will be offered a council home which meets their needs. The remaining 250+ social rented homes will be available to the most in-need households on the Housing Register beyond those living on the estate, as part of the council's commitment to deliver a new generation of council homes for local people. For many residents, the offer of a secure council tenancy in a home has been long awaited and will offer them much needed stability, that will help them to take better advantage of their opportunities in their careers, family and community activities. 2.6 The homes will be delivered as part of a healthy and sustainable neighbourhood which recognises the need for these to be part of a mix of employment, community and leisure activities, responding to the identified needs of the local community regarding issues such as health, financial security, community cohesion and personal safety and in particular, a step change improvement in the quality of homes for local residents. Alongside a £500k package to support for existing local businesses and funding to support new local business start-ups, a variety of commercial uses and employment activities will be delivered including retail, business and leisure space, which will help to support the town centre and support good business growth in the area. A range of types and levels of employment will be created which will include requirements for targets to be met in relation to employment of local people and people who might otherwise be overlooked seeking employment opportunities. This will be complemented by a focussed training programme, funded as part of the £10m socio-economic programme, that will help local people to access higher paid jobs in the local and wider London area and develop	

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	a sustainable career path, supporting existing successful programmes in the area and optimising the new opportunities provided, such as through the new Library and Learning Centre and community hub at the Grange. 2.7 High Road West will support the North Tottenham Improvement Plan's people-focused, cross sector, "Locality" based approach to improving areas and services by putting the quality of life for local people at the heart of decision making. Locality, or placed based services, are being introduced or piloted across North Tottenham, demonstrating a strong existing infrastructure to address the pressing challenges in the area. The North Tottenham Localities based work in summary includes: a) Connected Communities – a locality-based approach to early intervention and prevention. b) Place based care – delivery of holistic care in the community c) NHS Estates review – supporting a shift of services into the community d) Area based workers such as Local Area Coordinators (LACs), Employment Navigators, Haringey Gold community Safety Champions e) Building voluntary and community sector capacity to work directly with the public sector and to deliver sustainable change. 3. WORKING WITH LOCAL PEOPLE 3.1 Consultation and engagement with local residents and businesses has been an important part of shaping the High Road West scheme. The resident ballot that took place last year is an important milestone within a long-running timeline of working with Love Lane residents on the High Road West scheme. 3.2 The resident ballot in 2021 was based on a series of commitments that were set out in a 'Landlord Offer' that encapsulates previous feedback and commitments. This includes the consultation on the Resident Guides (agreed by Cabinet in 2014), Local Lettings Policy, Leaseholder Offer, and engagement on the proposed commitments to non-secure tenants. Discussion with residents on the masterplan and new homes has included the development of the Masterplan Framework (agreed in 2014), the creation of a Resident Design Guide (2015/16) and engagement across 2018. In spring 2021, residents gave feedback on a Masterplan and New Homes engagement booklet, and a series of themed interactive workshops took place. This feedback has shaped the vision and design principles presented in the Offer. The outcome of the ballot was a majority of 56% of eligible residents voting yes in favour of the plans to redevelop the Love Lane Estate as part of the High Road West scheme based on a turnout of 69% of eligible residents. 3.3 The council is committed to creating a good economy in the north Tottenham area, supporting local wealth building that benefits the local community. In achieving this, it is committed to working with existing businesses, with the aim to help them grow and be successful, so that the existing jobs in the area will be protected. Through	

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	engagement with businesses, the council committed to a Business Charter which seeks to reinforce the economic sustainability of individual businesses as well as enhance the local centre overall. In recent years, engagement has included business breakfast events and workshops alongside written updates and one-to-one meetings with business owners. 3.4 In 2018/19, the council worked with consultants Retail Revival to fund training and business development advice, as well as access to a small grants pot, addressing vacant premises through, for instance, use of meanwhile activities from the local area and beyond. Recent initiatives have included a 'Get Online for Business' programme, and an upcoming programme will focus on support for SMEs and start-ups. A dedicated engagement officer has worked with North Tottenham businesses to help them get involved. As the scheme progresses, socio-economic investment for businesses and the local centre will come forward to enhance this existing provision. 3.5 The council places a high priority in job creation through the High Road West scheme, with the need for employment opportunities being particularly high at the current time in the wake of the Covid crisis. Northumberland Park has the highest number of people claiming Universal Credit, Jobseekers Allowance and other job-related benefit allowances in Haringey and the highest level of people not in employment, education or training. • As a result the scheme will provide a range of opportunities including: o the jobs brokerage and employment support programme; o the STEM programme working with local schools; o the business support programme that has already supported 19 local shops and will support many more over the life of the project; o the business development spaces at the Library and Learning Centre, supporting hundreds of local people into work; o the youth apprenticeship programme; and, o the community digital hub that is supported by HALS to provide 1:1 support to residents is so important. • This will enable local people to take advantage of jobs and develop businesses across the region that they might previously not have had the opportunity to access. • This is in addition to the 130,000ft2 of new commercial, retail and leisure space that will provide over 500 jobs across a range of sectors and skills levels and with commitments to deliver jobs for local people, and sections of the community such as people who have been long term unemployed, women and people with disabilities. • There will also be 3,000 plus construction jobs arising from the scheme and the council is determined to ensure that people on the estate and living locally in North Tottenham are given opportunities to training and employment so that they can be at the heart of building their new neighbourhood.	

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	• The economic growth in the area as a result of the investment provided by the scheme, is likely to support the local economy helping to sustain local businesses and employment. • A series of funds from the scheme includes £500k for supporting businesses in their moves, whether this is as part of the scheme or elsewhere, and a further £500k for business support for businesses in the area, aimed at promoting the town centre and commercial areas. 3.6 The council is working to support businesses that need to be relocated by working to understand the individual aspirations of each business affected by the Scheme and aiming to relocate them where possible within the scheme, or as nearby as possible. The aim is to deliver the best available outcomes for them, both in relation to the availability and suitability of new employment spaces in the masterplan, and for their future options based on their individual aspirations, needs and circumstances. 3.7 The masterplan proposal delivers a significant proportion of commercial space which would be suitable for many existing businesses on the Peacock Industrial Estate and elsewhere in and around the site, if they wished to relocate there. The phasing plan has also been designed to provide opportunities for businesses to move once, from their current location to a new location. 3.8 The masterplan has been designed to offer modern accommodation suitable for a range of retailers, commercial and light industrial occupiers and will include the minimum delivery of 4,686sqm of either B2, B8 or Class E(g i, ii and iii) with suitable flexibility to accommodate a proportion of existing businesses. It is the Council's aspiration that, through the scheme, many businesses will be able to relocate into new high-quality spaces within the masterplan. We will be seeking to work with business owners to develop the optimal designs for these new spaces and other parts of the masterplan. 4. MASTERPLAN AND DESIGN 4.1 High Road West has focussed on delivering a strong approach to 'place-shaping' throughout, from initial masterplanning, developed around the 'High Road West Placemaking and Design Guidance' and onwards with the emerging Design Code document. 4.2 The aim throughout has been for high quality places that promote mixed and inclusive neighbourhoods supporting an attractive town centre with jobs and services for its communities; places that help meet people's wider needs and aspirations: for economic security; for health and well–being; for arts and culture; for safety and security; and for links to family and community. High Road West will have attractive, economically competitive, liveable, resilient places offering residents, workers and visitors enhanced opportunities and quality of life. 4.3 Clear design principles ensure high quality, liveable places and spaces throughout the scheme, optimising the opportunities for creating healthy streets and child-friendly activities, as well as promoting internal spaces which respond to the needs of people to play, study, socialise and commune and promoting sustainable living and	

Stakeholder	Comment	Response
	travel throughout. Driven by a strong design code approach, the scheme will be designed to ensure that people living, working and visiting the area will experience an attractive, safe and comfortable environment, with positive relationships between the scale and design of buildings and external areas and an attention to detail that is functional, sustainable and designed to celebrate the local character, culture and people. 4.4 High Road West uses best practice in creating healthy places, recognising the interconnectivity between factors such as accessibility, recreation, food, community facilities, building design and economic prospects and promoting a proactive approach based on the determinants of people's health. This is a critical issue with levels of obesity and diabetes, mental health and rates of stroke, cardiovascular disease and cancer being highest in north Tottenham compared to the rest of the borough and most parts of London, affecting the longevity and quality of people's lives and putting a strain on limited public resources. 4.5 The High Road West scheme will create the jobs which provide the opportunity for healthier lifestyles, the spaces for growing, selling and eating healthy food, the access to training and education, homes that provide space for social interaction, study and adequate peaceful sleep, opportunities for sports, recreation and active living and the public facilities that can provide or signpost health and social prescribing opportunities. It is aimed that streets across the scheme will have play activities and that access will be safe, attractive and inclusive for all people. The new homes will provide more options for healthy living that don't involve the damp, mould and cold that affects many Londoners' lives. Spaces across the scheme will provide numerous opportunities to socialise, celebrate local culture and diversity and create a more cohesive and strong community.	
Transportation	Environmental Statement Clarification is sought on the definition of 'interim scenario'. At Paragraph 15.2.7, it is stated that it will be assessed in two future year scenarios (peak demolition and construction phase, and complete and occupied phase), however elsewhere in the document (Paragraph 15.1.5), it is stated that the interim scenario is the scenario whereby only the southern site is developed. What is the scenario whereby both southern and northern sites are developed, and has it not been used as a basis for the environmental impact assessment? Chapter 15. Transport & Access The receptor sensitivities are all set at a 'medium' level, which lacks subtlety: • Pedestrians (including wheelchair users, people with pushchairs and people with mobility impairments) and cyclists are vulnerable road users and their sensitivity should be high. Any changes to conditions are likely to have a greater impact on them due to the time and effort required to travel on foot or by cycle. • Drivers are not the only road users that should be included. As a more general and inclusive term, this category should be renamed 'Motorised vehicle users' (including private car, taxi, bus drivers, delivery and servicing vehicle drivers, construction vehicle drivers and any vehicle passengers but excluding bus passengers). All motorised vehicle users experience delays as a result of changes in traffic flows and changes in routes which may affect only a proportion of their journeys. As such, their sensitivity should remain medium, as already suggested. • Bus passengers' sensitivity should be medium as they are sensitive to changes in traffic flows and routes which may affect only a proportion of their journeys.	Officers are satisfied that subject to conditions, the proposal would not have a severe impact on the transport network.

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	• Rail users' sensitivity should be medium due to localised changes in passenger flows which may affect only a proportion of their journeys. In Table 15.2, it is stated that, for amenity, fear and intimidation, the affected receptors include pedestrians, cyclists, bus and rail passengers. However, amenity, fear and intimidation do not normally apply to bus and rail passengers as they are already onboard services, only to pedestrians (including before and after using public transport services) and cyclists. The list of impacts for assessment is fine and in line with the guidance, however as I indicated in early feedback (informal scoping opinion request and formal scoping opinion request – HGY/2021/2960) it would be welcome to assess an additional impact, which is road user on-street parking. As you know, parking is critical in this scheme and the impact of it deserves to be assessed, especially as the on-street parking stock would be significantly altered and a substantial number of on-street parking activity (whether on public or private roads) would be generated. The parking stress surveys carried out as part of the Transport Assessment would be a good starting point to establish a baseline, on which the assessment of the parking impact could be built for future year scenarios. In light of the revised receptor sensitivities, and the effect scale matrix for the evaluation of significance, all likely significant effects, residual effects and residual cumulative effects should be reviewed to reassess the different impact groups of the proposed development. The review should also take account of the revised multi-modal trip generation assessment in the Transport Assessment (proposed and net alike). For each impact (severance, delay etc), and in particular if the assessment of the magnitude of impact is qualitative as opposed to quantitative, it is important for the proposed magnitude of impact to be clearly stated, in line with Tables 15.4 and 15.5 of Chapter 15 of the October 2021 ES. Below is a quick suggested re-appraisal of the likely significant effects with comments and questions for review:	

Stakeholder	Comment	Response

Impact and Receptor	Likely Significant Effect (Steer)	Likely Significant Effect (LB Haringey)
Demolition and Construction		
Severance: Pedestrians and Cyclists	Temporary, medium-term, local, adverse, and of minor significance	Very low magnitude of impact x high sensitivity = minor effect
Driver Delay: Drivers	Temporary, medium-term, local, adverse, and of minor significance	Medium magnitude x medium sensitivity = moderate effect – **not minor**
Public Transport Delay: Bus Passengers	Temporary, medium-term, local, adverse, and of minor significance	*Low or medium magnitude x medium sensitivity – minor or moderate effect? How many workers would commute to and from the site at peak? We need some data here to explain the magnitude of impact.*
Public Transport Delay: Rail Passengers	Negligible	*Why has the impact on rail not been assessed? Is it assumed that construction workers and visitors would not travel to and from the site by London Overground? If so, why?*

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Pedestrian and Cyclist Delay: Pedestrians and Cyclists	Temporary, medium-term, local, adverse, and of minor significance	Medium magnitude x high sensitivity = major effect – **not minor**
Amenity, Fear and Intimidation: Pedestrians and Cyclists	Temporary, direct, medium-term, local, adverse, and of minor significance	Low magnitude x high sensitivity = minor effect
Complete and Operational Development		
Severance: Pedestrians and Cyclists	Permanent, direct, long-term, local effect of minor beneficial significance	Very low magnitude x high sensitivity = minor effect – **not negligible** *Residual effects:* *With permeability improved throughout the site, would that equate to an overall negligible effect?* *This should also be updated to reflect the outcome of the discussions had with THFC/Spurs around crowd management and mitigation measures.*
Driver Delay: Drivers	Negligible	Very low magnitude x medium sensitivity = negligible effect
Public Transport Delay: Bus Passengers	Permanent, direct, long-term, local effect of minor adverse significance.	**Low magnitude?** x medium sensitivity = minor effect *I think we need a little more than professional judgement here. To justify the low magnitude of impact, we need a matrix with percentages of change per bus service to assess the magnitude of impact. The capacity of typical buses per line should be stated and an overall view can then be taken on the percentage of change throughout all affected bus services.*
Public Transport Delay: Rail Passengers	Permanent, direct, long-term, local effect of minor adverse significance.	Low magnitude x medium sensitivity = minor effect
Pedestrian and Cyclist Delay: Pedestrians and Cyclists	Permanent, direct, long-term, local effect of minor beneficial significance	Very low magnitude x high sensitivity = minor effect
Amenity, Fear and Intimidation: Pedestrians and Cyclists	Permanent, direct, long-term, local effect of minor beneficial significance.	Low magnitude x high sensitivity = minor effect
Accidents and Safety: Pedestrians and Cyclists	Permanent, direct, long-term, local effect of minor beneficial significance	Low magnitude x high sensitivity = minor effect

ES Non-Technical Summary including Addendum

Stakeholder	Comment	Response
	The non-technical summary is fine, subject to any numerical revisions in light of the requested changes to the trip generation assessments (proposed and net), as well as revisions with respect to the predicted likely significant effects (see comments on the ES chapter above). No comment Design Code Pedestrian routes – The absolute minimum pedestrian footpath width must be 1.8m, not 1.5m. Otherwise, the minimum of 2m should be met. Cycle routes – Across the site, high-quality segregated facilities should be provided to separate cyclists from both pedestrian and vehicular traffic, over and above minimum requirements. Parameter Plans No comment. Outline Residential Travel Plan The baseline surveys would be undertaken within 6 months of first occupation of the first phase or 75% residential occupation, with further surveys undertaken as each subsequent phase is complete and occupied. It should be made clear throughout the document that the trigger for the baseline travel surveys would be within 6 months of first occupation or once 75% occupation has been reached, whichever occurs first. The forecast residential modal splits in Table 3.1 must be revised in line with the comments made on the Transport Assessment, notably in terms of car driver and passenger mode shares. Likewise, the targets set in Table 4.1 will have to be revised for the same reasons. Although a reduction in the car driver and passenger mode shares is desirable over time, and in particular over the monitoring period, the decrease may only be in the region of a few percentage points. References to car parking must reflect that all Council housing residents will be able to access a car parking space if they need one (not just decanted residents). Family parking should also be mentioned in the measures and action plan accordingly. The Residential Travel Plan would be secured by Section 106 planning obligation. We would seek preoccupation interim documents then post-occupation full documents after the completion of the baseline travel surveys, to be repeated for each phase as the phased delivery of the proposed development progressed. For the present hybrid application, interim and operational documents would be sought for Plot A but the mechanism for future phases to be delivered with Reserved Matters would also be secured in the Section 106 agreement. Outline Framework (Commercial) Travel Plan Individual tenants would have to produce their own individual Travel Plans or Travel Plan Statements by using the Framework Travel Plan as a basis, if they are above the minimum threshold for producing a document as per the TfL	

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	guidance. They would also be required to have their own Travel Plan Coordinators answering to the site-wide, overarching Travel Plan Co-ordinator. The baseline travel survey would be undertaken within six months of first occupation of each phase of development, at the same time as the baseline delivery and servicing surveys. The forecast commercial modal split in Table 3.1, derived from the Transport Assessment (Table 5.25), shows an assumed 50-50 split between London Overground and bus services. My earlier comments on the Transport Assessment did not pick this up, therefore I would like to understand why this assumption has been made as it seems highly arbitrary. Owing to the high volume of commercial trips forecast to be made by public transport during the peak hours (in excess of 500 two-way movements), a significant number of trips could potentially be directed to the wrong public transport mode and the impact assessment undertaken in the Transport Assessment skewed as a result. The Framework Travel Plan and associated documents would be secured by Section 106 planning obligation. We would seek pre-occupation interim documents then post-occupation full documents (including an updated operational Framework Travel Plan and individual Travel Plans/Travel Plan Statements) after the completion of the baseline travel surveys, to be repeated for each phase as the phased delivery of the proposed development progressed. For the present hybrid application, the mechanism for future phases to be delivered with Reserved Matters would also be secured in the Section 106 agreement. Outline Delivery and Servicing Plan The delivery and servicing trip generation figures presented in Table 3.1 are derived from Table 5.28 in the TA, and therefore may have to be revised depending on the outcome of the comparison with TRICS which has been requested to ascertain the robustness of the proposed trip rates proposed by Steer. The resulting loading bay requirements (based on the maximum parameters) should also be derived from the delivery and servicing peak hour and be stated in the Outline Delivery and Servicing Plan (DSP). For the present hybrid application, both an interim DSP and a Detailed DSP would be sought for the masterplan (including Plot A) to be produced respectively before occupation and post occupation (after the baseline delivery and servicing surveys undertaken within 6 months of first occupation). The mechanism for the DSP as part of future phases to be delivered with Reserved Matters applications would also be secured by planning condition. The surveys would be carried out at the same time as the baseline travel surveys. Outline Construction Environmental Management Plan Revised Demolition and Construction Environmental Management Plan (DEMP/CEMP) would be submitted for each future RMA.	

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	A Detailed Construction Logistics Plan (CLP) would be secured by planning condition for Plot A. Future RMAs would include Outline CLPs as part of revised CEMPs/DEMPs, and Detailed CLPs would subsequently be secured by planning condition associated with each RMA/phase of development. Cycle storage would be provided on site for site operatives, with numbers to be reviewed against demand on a monthly basis. This is welcome. It is understood that, at peak, 300 Lendlease and extended supply chain management staff to be present on site full time alongside circa 1,400 site operatives. The maximum number of on-site personnel would therefore be around 1,700 people on two occasions, in 2026 and 2028. The peak HGV traffic per month is expected to be attained in mid-2026 and late 2028 with 7,100 vehicle movements consisting of 4,300 HGV and 2,800 LGV movements. The peak year is expected to be 2028 with 14,780 movements. The Transport Assessment indicated that the impact of construction at peak would lead to fewer vehicles than the existing vehicle trip generation. Due to the proximity of the site with a number of schools, every effort should be made to schedule deliveries and collections where construction traffic is to pass by schools outside school opening and times (namely 08:00-09:00 and 15:00-16:00). Generally, construction deliveries and collections should also be scheduled outside the local network peak hours. Please ensure this is reflected in future documents. Section 106 Heads of Terms - Car-free/capped development – both residential and commercial, including £5,000 towards the amendment of the local Traffic Management Order, excluding Council housing residents - Car club: o Car club provision (10No. on-site spaces) o Establishment or operation of a car club scheme o Contributions from developer to residents - two years' free membership for all residents and £50 (fifty pounds in credit) per year for the first 2 years and an enhanced car club membership for the residents of the family-sized units (3+ bedrooms) including 3 years' free membership and £100 (one hundred pounds in credit) per year for the first 3 years – CPZ contributions to the ongoing review and expansion of existing Controlled Parking Zones – under review. - S.278 highway works agreement (scope and extent of works to be defined after obtaining a detailed Section 278 drawing for costing purposes) - Commercial Travel Plan (including Interim and Full documents, monitoring reports and a £3,000 monitoring contribution) including: o Appointment of a Travel Plan Coordinator (to also be responsible for monitoring Delivery Servicing Plan) o Provision of welcome induction packs containing public transport and cycling/walking information, map and timetables to every new tenant/organisation	

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	o Cyclist facilities (lockers, changing rooms, showers, drying rooms for the non-residential uses) - Residential Travel Plan (including Interim and Full documents, monitoring reports and a £3,000 monitoring contribution) including: o Appointment of a Travel Plan Coordinator (to also be responsible for monitoring Delivery Servicing Plan) o Provision of welcome induction packs containing public transport and cycling/walking information, map and timetables to every new household - Future Connectivity and Access Plan - Enfield Traffic Management Order contribution - £20,000 (indicatively, based on past applications) - Walking and cycling/transport infrastructure contributions – under review - Public highway condition (before/after works) - Cycle parking and access details - Detailed Construction Logistics Plan - Demolition/Construction Environmental Management Plans - Delivery and Servicing Plan - Car Parking Design and Management Plan (including the provision of electric vehicle charging points – both active and passive, space allocation strategy, wheelchair-accessible car parking) - Combined Stage 1/2 Road Safety Audits along all shared surface lanes within the masterplan and for all new access points on White Hart Lane, the A1010 High Road, Brereton Road and Whitehall Street - Basement Vehicular Access Control Arrangements (RMA stage) - Highway stopping-up, diversion and adoption (if relevant) details Transport Assessment (including Car Parking Management Plan) and Design and Access Statement Baseline Conditions It is noted that 64% of the site falls within PTAL 4, 25% PTAL 5 and 11% PTAL 3. A parking stress survey was requested as per the Lambeth methodology and undertaken in May 2021. It highlighted significant spare capacity within the local Controlled Parking Zone (CPZ) that is operating at 60% capacity. It also found that there was limited capacity within the private car parks and on private roads, including those managed by Homes for Haringey (Tenterden Road and Headcorn Road). Overall, 71% of all spaces in the study area were utilised. Additionally, LBH Regeneration undertook a telephone survey of current Homes for Haringey residents and found that 43% of respondents (out of a sample of 87) said they owned a vehicle. ATZ Assessment The ATZ assessment was reviewed in detail. The lists of personal injury accidents for each route do not say whether any of the accidents were attributable to reasons other than human error. However, no physical interventions which could reduce the frequency and severity of such accidents are recommended in this section, but a number of suggestions have been made, namely: - Review and removal of footway parking where relevant to facilitate pedestrian flows along footways; - Inclusion of cycle lanes to encourage cycling as a safe mode of transport; - Addition of benches for pedestrians to stop and rest;	

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	- Improvements to pedestrian crossings with tactile paving, or creation of formal zebra crossings; and - Improvements to footway and crossing surfacing. Is the increase in trips as a result of the proposed development (and local committed schemes) likely to result in additional accidents on the network and, if so, are the measures outlined above sufficient? If mitigation is necessary then we need to know. Can the exact locations of the proposed improvements set out above be identified accurately on a map? Development Proposals Quantum of Development The floorspace and accommodation schedule of the outline element of the proposed development reflects suitable flexibility for a range of land uses, ranging between minimum and maximum parameters. The latter are as follows: - 280,000sqm C3 - 8,000sqm B2/B8 - 22,000sqm E - 6,000sqm F - 8,300sqm Sui Generis - 5,000sqm as on-plot residential parking Maximum total: 339,300sqm A maximum total of 2,977 residential units are proposed (297 existing properties, hence a proposed uplift of 2,680 units including +747 affordable units). The detailed element of the proposed development, Plot A, comprises 60 dwellings, of which 29 units are proposed to be family dwellings (3+bed units). Cycle Access and Parking (Plot A) Cycle parking and access details for Plot A would be secured by planning condition. Cycle Access and Parking (Masterplan) The masterplan proposes a dedicated cycle route running through the masterplan site in a north-south direction, which avoids the High Road. A connection with the extension to Cycleway 1 is allowed for to the west of the site. Within the site it is understood that the intention is for cycling to be accommodated on carriageway along one-way and two-way	

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	vehicle routes as well as through public realm areas. Delineation would be provided along one-way routes and across the public realm, but not along two-way routes. No segregation is proposed. Further justification is required in relation to the creation of a one-way system on Love Lane, Moselle Street and William Street. Where one-way systems are provided, dedicated cycle contraflow facilities are required. Cycle parking is proposed to be provided in line with the London Plan (2021) minimum standards, with 5% of the total provision to cater for larger cycles with adequately enlarged spaces. In addition to this, we would expect to see a proportion of cycle parking delivered in the form of Sheffield stands for regular cycles. This proportion should be comprised between 5% and 20% and would be discussed as part of any future Reserved Matters applications. Cyclist facilities such as lockers, changing rooms, showers, drying rooms etc for non-residential will be required and must be secured via the Travel Plan as part of the S.106 agreement. Car Parking (Plot A) No general car parking is proposed on Plot A due to spatial constraints. Based on the telephone surveys of existing residents, it is estimated that the 60 units would generate parking demand for 26 vehicles. The proposal is to accommodate that demand on street in the local area in the interim, where sufficient spare capacity has been identified by the parking stress survey. It is assumed that an all on-street parking solution would be a short-term solution until more plots got delivered and some parking for Council housing residents relocated off street/off the CPZ. Any parking occurring on street would require CPZ permits to be arranged by Homes for Haringey on behalf of Plot A residents. Car Parking (Masterplan) and Car Park Management Plan a. General The proposals are for a combination of on-street spaces on public (CPZ) roads, private roads and off street car parks (on plot). Existing accessible and doctors' bays as well as taxi ranks would be retained, which is welcome. It is indicated that the minimum 3% wheelchair-accessible provision would be 3 delivered from the outset for each plot in the future, and the plan in Appendix F shows the indicative (safeguarded) footprints of delivering the full 10% wheelchair-accessible parking provision. Wheelchairaccessible parking for non-residential uses would also be provided, in line with the London Plan standards. b. Council Housing The telephone survey undertaken in May 2021 established a baseline to determine the likely maximum demand generated by future residents housed by Homes for Haringey. As all 500 Council housing units would be provided south of White Hart Lane, it is important that all plots delivered within that area as part of any future Reserved Matters applications make adequate allowance for parking. Based on the existing parking demand generated by current Council housing residents, if all Council housing residents were offered the right to park, up to 500 x 43% = 215	

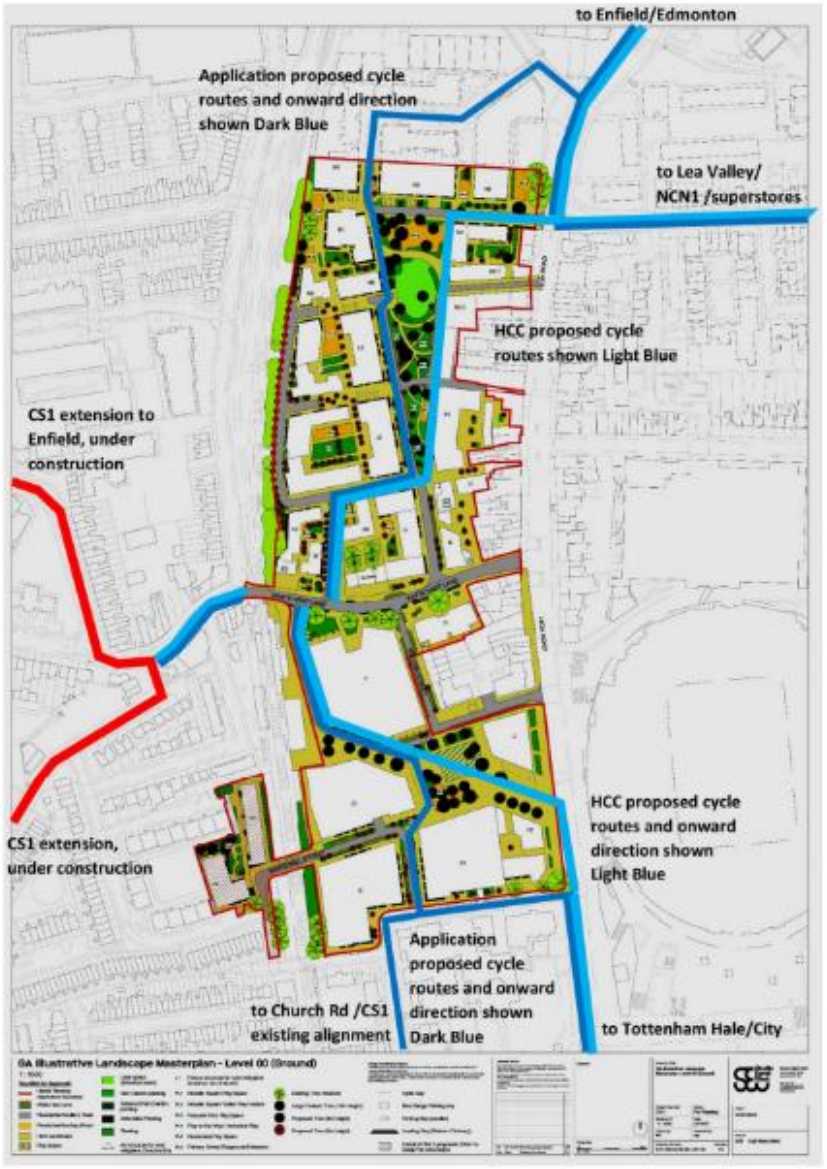
Stakeholder	Comment	Response
	spaces would be required to meet the likely demand, which would have to be met mostly south of White Hart Lane, in close proximity of the proposed Council homes. Presently it is difficult to understand how much on-street parking there is proposed to be on site (with the exception of the 10% wheelchair-accessible parking provision) and what the total capacity would be, over and above accessible parking. Due to the potentially high number of spaces to be provided for Council housing residents, the provision of the 10% accessible parking from the outset on the southern plots is highly encouraged to create and maximise the amount of off-street parking, of which a proportion not taken up by future resident wheelchair users could be reallocated to Council housing residents through a dynamic Car Park Management Plan to be conditioned. c. Family Dwellings (3+ bed units) Likewise, it is noted that the whole masterplan would include approximately 16% of family dwellings (based on the illustrative masterplan). Any surplus non-CPZ parking not taken up by wheelchair users living on site should be offered to residents of family dwellings (in the order of priority, Council housing tenants would come in first, then residents of non-Council family-sized units). The priority order and mechanism for reallocation of accessible spaces on temporary leases should be discussed in more detail in the Car Parking Management Plan to be secured by planning condition. North of White Hart Lane where residential units would not be managed by Homes for Haringey and where the primary function of car parking would be for wheelchair users residing on site, it is essential to safeguard the necessary land/footprint to deliver all additional spaces (maximum 10% provision in line with the London Plan) from the off. In addition, we strongly advise that the proposed basement car park be also designed at full capacity (delivering sufficient spaces to meet the 10% accessible parking provision target) to provide such reallocation flexibility in favour of family dwellings. d. Conclusion The illustrative scheme shows that the minimum 3% parking provision delivered from the outset would provide a total of 89 spaces. If future Council housing residents follow the same vehicle ownership patterns as existing ones on the Love Lane estate, and all are granted a right to park, then up to 215 spaces would be required to meet that demand (of which a small proportion would overlap with the accessible provision). Additionally, we strongly recommend the applicant provide the further 7% parking from the outset throughout the whole masterplan site to cater for Council housing residents' off-street parking demand and any demand likely to arise from occupiers of family-sized dwellings. Planning committee members are very keen to see some parking made available to larger residential units. Relying on any potential unused non-CPZ accessible parking is the right way of boosting parking available on site without overproviding on-site parking and adding unnecessary pressure on CPZ parking. That would therefore bring the total parking provision somewhere in the region of 512 spaces (or slightly fewer due to a number of wheelchair users being Council housing and family-dwelling residents). That would equate to an overall car parking ratio of 0.17 spaces per unit across the whole masterplan site. Whilst this is not an indication of an	

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	absolute target to aim for, this is broadly in line with what was agreed for the Goods Yard and the Depot application (HGY/2021/1771) which provided an overall car parking ratio of 0.16 spaces per unit with parking provided at basement level. Overall, WebCAT indicates that the site mostly lies in areas of PTAL 4, with pockets of PTAL 5 and with the northwestern corner having a slightly lower PTAL (3). The site is also located in the Tottenham North CPZ. In accordance with Policy DM32: Parking of the Development Management DPD, the proposed development would qualify for a car-free status (the part of the site with lower connectivity is immediately adjacent to areas of PTAL 4; London Plan paragraph 10.6.4 also states that "the starting point for discussions should be the highest existing or planned PTAL at the site"). The Council would not issue any occupiers with on-street resident/business parking permits due to its car-free nature, with the exception of Council housing residents relying at least in part on CPZ parking. The Council would use legal agreements to require the landowners to advise all occupiers of the car-free status of the proposed development. Car club A car club viability report has been provided which highlights that Zipcar recommends a total of 10 car club spaces. Car club membership contributions for all residents would be secured via a Section 106 planning obligation. Non-Residential Trip Generation As far as the non-residential trip generation assessment is concerned, the use of Goods Yard Transport Assessment office trip rates and adjusted journey-to-work modal split is accepted. Highway Impact Completed Development In addition to my earlier queries, will network modelling be required after the proposed and net trip generation assessments have been revised? Public Transport Impact In TfL's response following the TfL pre-application meeting in June 2021, it was noted that "Cumulative impacts on the bus network will be considered by TfL and will not be set out in the TA." Whilst we appreciate TfL's request, we will still require sight of that cumulative impact assessment as part of the review of the planning application.	
Waste	The document provides some detail on how waste is to be contained and managed within Plot A and the 3 cores (A1, A2 and A3) that make this up. This has therefore been the focus of this review. There is reference to more detail following in reserve matters applications on how waste will be managed across the other blocks that form part of the	Conditions are proposed to secure appropriate

Stakeholder	Comment	Response
	wider development. An outline of bin numbers required for each block has been set out in Appendix B. These appear to have been calculated in line with LBH guidance and are therefore adequate. Communal bin collections from this development will be weekly. The bin calculations for Plot A presented in table 5, section 4.1. Are in line with LBH requirements. For Plot A1 there is reference to a 360l bin for food waste. We would now prefer that space is made for 140l bins (1 bin per 10 units). Therefore 3 x 140l bins would be needed here. The indicative communal bin store locations on the appended drawings (Appendix A) appear to acknowledge the 10m drag distance for bin collections specified in the SPD and referenced under 2.1.7 in the OWMS. The wheeled bin pulls from the duplex units appear to be acceptable. The swept path analysis provided will need to show more clearly that efforts have been made to limit reversing of RCV vehicles/factoring in space for vehicles to turn around. Commercial waste management sits outside of this strategy. Sizing/number of bins will very much depend on the type of businesses that occupy the space in operation, the waste/recycling they generate and the contracts they put in place for the collection of this. Commercial waste collection companies can provide up to twice daily collections 7 days per week. I would however advise against sizing the bins store based on minimum size and maximum collections. The store should be sufficient to store waste for one week. I hope these comments are helpful. We will be happy to review further drawings and documents in relation to operational waste management from this development as these are developed and shared.	waste storage and collection arrangements.
External		
Affinity Water	No comment received	
Arriva London	No comment received	
National Planning Case Unit	I confirm that we have no comments to make on the environmental statement.	
Clinical Commissioning Group	Thank you for the opportunity to comment on this planning application. This is a significant development of up to 2,929 new homes on a strategic site of 8.5 ha in north Tottenham. It is allocated as Site NT5 in the Tottenham Area Action Plan (2017). The development will have a significant impact on healthcare infrastructure and the High Road West Masterplan Framework (2014) acknowledges that additional healthcare provision is needed in the area, particularly primary care services. The site is located in Northumberland Park ward which is one of the most deprived wards in England. Therefore, access to healthcare and wider health inequalities are a key issue. The site is a multiple ownership, with the Council as main landowner of land to the south of White Hart Lane, including the Love Lane Estate. This includes sites owned by Tottenham Hotspur Football Club north of White Hart Lane. The CCG has responded to current applications for 867 new homes and commercial space on the Depot and Goods Yard site (HGY/2021/1771) and an application for 72 new homes, a cinema and supporting commercial uses on the Printworks site (HGY/2021/2283).	A planning obligation is proposed to ensure that the proposal does not generate a deficit in local healthcare provision.

Stakeholder	Comment	Response
	To the north of the site, in Enfield, is the Joyce and Snells Estate, where the London Borough of Enfield is looking to bring forward an estate renewal scheme comprising approximately 1,992 homes and associated social infrastructure and open space. This together with High Road West will have a cumulative impact on healthcare services in the area. We note that Table 1 of the Planning Statement sets out the minimum and maximum total floorspace cap by land use. It includes Use Class E (e): Medical or healthcare with a floorspace range of between 0 sqm to 1,000 sqm (GEA). Paragraph 3.20 implies that the healthcare floorspace could be provided in, or across a number Development Zones (Plots). The application site includes Tottenham Health Centre at 759 High Road which would be demolished as part of the plans for Plot E and the creation of Moselle Square. Policy DM49 (A) of the Development Management DPD (July 2017) states that the Council will seek to protect existing social and community facilities unless a replacement facility is provided which meets the needs of the community. Paragraph 7.44 of the planning statement states that "sufficient flexibility has been incorporated within the maximum land use parameters to allow a future healthcare use to be delivered on-site" to replace the existing facility.	
Enfield LB	No comment received	
Environment Agency	We understand that it is deemed not feasible to de-culvert the Moselle Brook as part of this application which you are in agreement with because of the constraints and place making requirements associated mainly with the stadium and access. We can accept this justification. With this in mind, we believe that planning conditions could be invoked to ensure that the culvert is protected and fit for purpose for the lifetime of the development. We have discussed wording of these conditions with the applicant and if agreeable these planning conditions would enable us to remove our objection. Before confirming this position I need to discuss the planning conditions with my flood risk colleagues. I will have this discussion early next week and submit a more formal response on the matter by Tuesday.	Suitalbly worded planning conditions are proposed to ensure that the proposal does not adversely impact on the existing culverted river.
Haringey Cycling Campaign	HCC were consulted in 2018 and again in 2021 on the plans for this development. We emphasised the need for cycle routes serving identified destinations, routed directly and clearly defined for legibility and to avoid pedestrian conflict. We also commented in 2021 that the main public open space should be more generous. The scheme now submitted proposes virtually invisible cycle routes that wander aimlessly to the North of the site and in a slightly less aimless fashion to the South. The Mayor's London Plan Guidance has statutory weight in planning decisions and makes it clear that development plans should "protect and improving existing cycle routes and create new strategic routes and local links", as the extract below. Additionally the statutory guidance in LTN1/20 makes it clear that cycle routes should be direct and easy to follow, as the core design principles (below left) and makes clear, wherever there are high pedestrian numbers, cycles must be physically separated from pedestrians, as the summary principles, below right.	Planning conditions are proposed to secure the detailed landscaping details, cycle parking arrangements and road safety audits of areas where there is a potential

Stakeholder	Comment	Response
	The development is planned to have 2,869 new homes and at least 7,225sqm of commercial, office, retail and community uses and there will be considerable pedestrian traffic, generated both by the development and in the surrounding areas. The development is not a small housing estate where limited shared use might be acceptable. Development Plans should identify and make provision for current and future needs for cycling, including protecting and improving existing cycle routes and creating new strategic routes and local links. They should identify locations for cycling facilities such as cycle parking hubs, additional cycle land requirements and, where applicable, areas of potential expansion of the Cycle Hire network..... Development Plans should identify strategic cycle routes based on the corridors in TfL's Strategic Cycling Analysis (SCA), set out preferred route alignments as far as possible and include safeguarding as necessary..... Development Plans should identify and make provision for local cycle links that connect to and complement the strategic cycle network..." https://www.london.gov.uk/sites/default/files/sustainable_transport_walking_and_cycling_london_plan_guidance_0.pdf  LTN1/20 Core Design Principles Fig 1.1  2) Cycles must be treated as vehicles and not as pedestrians. On urban streets, cyclists must be physically separated from pedestrians and should not share space with pedestrians. Where cycle routes cross pavements, a physically segregated track should always be provided. At crossings and junctions, cyclists should not share the space used by pedestrians but should be provided with a separate parallel route. Shared use routes in streets with high pedestrian or cyclist flows should not be used. Instead, in these sorts of spaces distinct tracks for cyclists should be made, using sloping, pedestrian-friendly kerbs and/or different surfacing. Shared use routes away from streets may be appropriate in locations such as canal towpaths, paths through housing estates, parks and other green spaces, including in cities. Where cycle routes use such paths in built-up areas, you should try to separate them from pedestrians, perhaps with levels or a kerb. LTN1/20 Summary Principles 1.6.1 (2) The Site Plan below shows the circuitous cycle routes proposed by the applicants, together with routes proposed by HCC, which we suggest would be better used and could give compliance with LTN1/20.	conflict between highway users.

Stakeholder	Comment	Response
		

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	The Design and Access Statement includes details of path surfacing that make no allowance for safe cycle use and do not comply with LTN1/20. Cycle users are given no indication of where they are meant to cycle and pedestrians will have no idea of where to expect cycles. In fact the proposed cycle routes will be virtually invisible.  Part of cycle route, N from White Hart Lane  Cycle route, Peacock Park Although not directly a cycling matter, we would point out the main public space, Peacock Park has shrunk in size since the competition winning design of 2018. We suggest the wedge shaped park, narrowing to a point and hemmed in by tall buildings on all sides, will feel uncomfortable and should be redesigned to give a more relaxed and generous space.  Competition sketch  Present proposal I would be grateful if you could register Haringey Cycling Campaign's objection to the proposals and in particular our objection to the cycle routes, which will not comply with current standards and good practice. Legible, safe and direct cycle routes are essential, which will serve increasing cycle use by residents and the wider community, improve health and mobility and help in the fight against climate change.	

Stakeholder	Comment	Response
Historic England	Thank you for your letter of 3 February 2022 regarding further information on the above application for planning permission. On the basis of this information, we do not wish to offer any comments. We suggest that you seek the views of your specialist conservation advisers, as relevant. It is not necessary for us to be consulted on this application again, unless there are material changes to the proposals. However, if you would like detailed advice from us, please contact us to explain your request. This response relates to designated heritage assets only. If the proposals meet the Greater London Archaeological Advisory Service's published consultation criteria we recommend that you seek their view as specialist archaeological adviser to the local planning authority. The full GLAAS consultation criteria are on our webpage at the following link: https://www.historicengland.org.uk/services-skills/our-planning-services/greaterlondon-archaeology-advisory-service/our-advice/	Specialist Heritage advisers have been consulted on the proposal.
London and Middlesex Archaeological Society	The London and Middlesex Archaeological Society (LAMAS) promotes London's archaeology, local history, and historic buildings. The LAMAS Historic Buildings and Conservation Committee reviews planning applications relating to important historic buildings and seeks to ensure a sustainable future for vital aspects of London's built heritage. The Committee reviewed and discussed the application documents at and subsequent to its meeting on 22nd November and wishes to make the following comments. The Committee is concerned by the scale of the loss of locally listed buildings that would result from the proposed development, namely Nos. 743–759 High Road and the electricity substation building adjoining Coombes Croft Library. These losses are much greater than it would normally consider acceptable. On this occasion, however, it acknowledges that Haringey has in effect already set the direction of travel by proposing in its own Conservation Area Appraisal and Management Plan (paragraphs 2.8.5 to 2.8.8) the de-designation of subarea C of the North Tottenham Conservation Area in which the buildings stand, facilitating their removal and likewise of those around them to improve passage between the Tottenham Hotspur Stadium and White Hart Lane Station. This strategy on the part of Haringey of diminution and division of the Conservation Area is arguably more objectionable than the proposed destruction of locally listed heritage assets. The submitted plans envisage the demolition and replacement of the buildings, with no option given for their retention or relocation. This feels unimaginative and underappreciative of the present and potentially the future contributions they can make to the local built environment. The retention of designated heritage assets such as the Grade II listed Warmington House (744 High Road) across the High Road in the redevelopment of White Hart Lane stadium and its surroundings exemplifies how historic buildings can be retained and successfully repurposed in the context of local new development. The late 19th- or early 20th-century substation building, noted in the Conservation Area Appraisal to be of "vaguely gothic style" (paragraph 1.5.28), is of a very modest size that would facilitate its re-erection as an element of the new development; in one corner of the envisaged 'Moselle Square', for example. In the event it is decided there is no advantage to be gained by the retention of the affected locally listed heritage assets in some form, the Committee asks that historic building recording to at least Historic England Level 2 (and	A planning condition is proposed to secure historic building recording.

Stakeholder	Comment	Response
	preferably Level 3) be imposed as a condition of any planning consent granted. This recording exercise might also seek to capture the recent social histories of the buildings and areas that will be affected by redevelopment, especially given the application documents give an uncertain impression as to whether the present, wonderfully diverse array of businesses and activities accommodated by the locally listed buildings will not all find new homes in the High Road West development.	
London Overground Infrastructure Management	Thank you for your consultation. Rail for London (RfL) has no objection in principle to the above refenced planning application subject to a number of potential constraints on the development of the site situated close to RfL Infrastructure. Therefore, it will need to be demonstrated to the satisfaction of RfL that: • the development will not have any detrimental effect on RfL Infrastructure & Operations in the short or long term • the design must be such that the loading imposed on RfL Assets is not increased or removed • we offer no right of support to the development or land RfL requests that the grant of planning permission be subject to conditions to secure the following: The development hereby permitted shall not be commenced until detailed design, method statements & risk assessments for each stage of the development covering demolition, substructure and superstructure and all temporary works have been submitted to and approved in writing by the local planning authority (in consultation with RfL) which: • provide details on all structures • provide details on the use of plant • accommodate the location of the existing RfL Assets / Infrastructure • accommodate RfL Operational and Maintenance requirements • accommodate ground movement arising from the construction thereof • mitigate the effects of noise, vibration & distractions arising from the adjoining operations to the RfL Infrastructure & Operations In addition, • RfL requires that the applicant enters into an Asset protection Agreement with RfL to ensure that the development is carried out safely and in accordance with RfL's requirements. • No maintenance regime for the proposed development elevations facing the railway should be permitted which compromises the safe, efficient and economic operation of the railway. • For all new developments adjacent to operational lines RfL accepts no liability in respect of noise and vibration. Developers should undertake their own investigations to establish any level of noise and vibration likely to originate from the operation of the railway, and design their mitigation measures accordingly. • Any additional fencing required on the railway boundary, for example for screening purposes, must be independent of RfL's fencing and allow room for maintenance of both fences. • All drainage needs to be directed away from the railway and into local authority sewers, and it should be installed a minimum distance of two metres from the railway boundary. The use of soakaways is not favoured by RfL and therefore is unacceptable as they could have a detrimental effect on RfL land. The drainage system should be designed to take this into account.	Planning conditions and informative are proposed to ensure that the proposal does not have an adverse impact on existing rail infrastructure.

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	• RfL would be opposed to balconies and fully openable windows on the elevations facing the railway (applicable to those in close proximity of the railway). The development shall thereafter be carried out in all respects in accordance with the approved design and method statements, and all structures and works comprised within the development hereby permitted which are required by the approved design statements in order to procure the matters mentioned in paragraphs of this condition shall be completed, in their entirety, before any part of the building hereby permitted is occupied. Reason: To ensure that the development does not impact on existing or proposed Rail for London transport infrastructure & operations, in accordance with London Plan 2015 Table 6.1, draft London Plan policy T3 and 'Land for Industry and Transport' Supplementary Planning Guidance 2012. This response is made as Rail for London Infrastructure Manager under the "Town and Country Planning (Development Management Procedure) Order 2015". It therefore relates only to railway engineering, operational and safety matters. Other parts of TfL may have other comments in line with their own statutory responsibilities.	
London Fire Brigade	I've had a look at the documents provided and the fire fighting access highlighted within the documents would appear to meet our requirements subject to meeting them	Detailed fire safety statements will be secured by planning condition.
Natural England	Following discussion and receipt of further information related to the proposal, Natural England is satisfied that the specific issues we have raised in previous correspondence relating to this development have been resolved. We therefore consider that the identified impacts on Epping Forest Special Area of Conservation (SAC) and underpinning Site of Special Scientific Interest (SSSI) can be appropriately mitigated with measures secured via planning conditions or obligations as advised and withdraw our objection. Natural England recommends that the Appropriate Assessment for this proposal is updated with regards to the final agreements between us and the Council on appropriate avoidance and mitigation measures for Epping Forest SAC, if it has not been already. We consider the following to provide appropriate avoidance and mitigation measures: • Appropriate mitigation measures secured through a financial SANGs contribution, for improvements to Bruce Castle Park, as outlined in the draft AA shared with NE on the 4th of March, and to be fully determined by London Borough of Haringey in line with NE interim guidance to improve the accessibility and biodiversity of the park. We recommend that conditions or legal obligations are attached to any subsequent permissions to secure the above measures.	A planning obligation is proposed to secure SANG's mitigation.

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	In principle we would agree to this contribution to improve a local greenspace. However, as mitigation is now being provided the Habitats Regulations Assessment produced for the development will need to go to Appropriate Assessment (in line with the decision made at the People Over Wind ECJ). For this reason, and in order for the HRA to be secure from challenge, we would need to see a bit more detail in terms of the improvements that would be made to Bruce Castle Park, and how these would in turn lead to the site being a more accessible and desirable park to visit for the residents of the new development. It may be that Haringey Council are best placed to provide these details, rather than the developer of the High Road West site, but we feel that they would need to be included in the AA section of the HRA in order to ensure the security of the mitigation, and for us to be able to agree with the conclusion of no likely significant effect from the development on Epping Forest SAC.	
Network Rail	Thank you for consulting with Network Rail regarding the following application. Network Rail strongly recommends the developer complies with the following comments and requirements to maintain the safe operation of the railway and protect Network Rail's infrastructure. **Network Rail strongly recommends the developer contacts the Asset Protection Teamon AngliaASPROLandClearances@networkrail.co.uk prior to any works commencing onsite, and also to agree an Asset Protection Agreement with us to enable approval ofdetailed works. More information can also be obtained from our website https://www.networkrail.co.uk/running-the-railway/looking-after-the-railway/asset- protection-and-optimisation/** ***Section A*** identifies the main issues specifically derived from the application HGY/2021/3175 and ***Section B*** are generic comments from our Asset Protection (ASPRO) team which aim to ensure high standards of Network Rail's operation. **Section A:** 1. Given the proximity of the proposal to our White Hart Lane Station, I have thefollowing comments: 2. Access to and from the Station is to be maintained at all times for NR and the TOC. 3. Any impact to NR infrastructure and the Station is to be coordinated with ASPROand presumably a APA/BAPA to be put in place. 4. Any access required to the Station for the purposes of surveys, etc are to be coordinated with	Planning conditions and informatives are proposed to ensure that the development does not adversely impact existing rail infrastructure.

Stakeholder	Comment	Response
	the TOC. 5. Lighting to the Station should not be impacted, if it is this should be worked throughwith NR and the TOC. 6. As should construction noise, should not impact the operation of the Station. 7. If there are impacts to Station assets and or any services which shall pass throughthe Station lease area, this may be subject to regulatory consents such as Station Change, Minor Modifications and G6 consultations (in the case of wayleaves or easements which may be required) **Section B – ASPRO Comments:** **Item 1. Issues** - Proximity of the proposed development to the Network Rail boundary andoperational equipment. **Reasons/Mitigations:** The developer/ designer must ensure that they allow sufficient space from the Network Railboundary fence so as not to import risk to the operation of the railway or impose risk to theoccupants of the building or maintenance staff. A minimum of 2.5m should be allowedbetween the Network Rail boundary fence and any superstructure. A minimum of 3m mustbe allowed to any Network Rail electrification equipment. The developer must ensure any future maintenance intervention does not import risk tothe operational railway. The applicant must ensure that the construction and subsequent maintenance of their development can be carried out without adversely affecting the safety of operational railway. **Item 2. Issues** - Demolition activities resulting in collapse onto the railway. **Reasons/Mitigations:** The applicant shall provide all demolition and construction methodologies to Network Railfor acceptance prior to commencing the works relating to all works that may import riskonto the operational railway, potentially cause disruption to railway services or present riskto the infrastructure. A suitable designed hoarding must be erected near the boundarywhich will afford protection to the railway and railway assets. **Item 3. Issues** - Potential impact on the adjacent railway infrastructure from the construction activities. **Reasons/Mitigations:** The applicant shall provide all demolition and construction methodologies to Network Railfor acceptance prior to commencing the works relating to all works that may import riskonto the operational railway, potentially cause disruption to railway services or present riskto the infrastructure.	

Stakeholder	Comment	Response
	Item 4. Issues - Invasive plants near the railway. **Reasons/Mitigations:** The developer must determine the locations and extents of any invasive plant species (forexample: Japanese Knotweed) which must be treated in accordance with the current codesof practice and regulations where it exists on site. **Item 5. Issues** - Piling/ deep excavation causing movement/ settlements to the railwayinfrastructure adversely affecting the track geometry or stability of operational infrastructure. **Reasons/Mitigations:** The developer must ensure that any piling or deep excavations adjacent to the railway donot have an impact on operational railway assets. An impact assessment must be conducted using information specific to the site and track and structure monitoring must be instigated in accordance with Network Rail standard NR/L2/CIV/177 where Piling/ deepexcavation is proposed within the track support zone. **Item 6. Issues** - Potential buried services crossing under the railway tracks. Some of the services may be owned by Network Rail or Statutory Utilities that may have entered into acontract with Network Rail. **Reasons/Mitigations:** The developer is responsible for a detailed services survey to locate the position, type of services, including buried services, in the vicinity of railway and development site. Any utilityservices identified shall be brought to the attention of Senior Asset Protection Engineer (SAPE) in Network Rail if they belong to railway assets. The SAPE will ascertain and specify what measures, including possible re-location and cost, along with any other asset protection measures shall be implemented by the developer. **Item 7. Issues** - Collapse of plant or cranes near or over the Network Rail boundary. **Reasons/Mitigations:** The operation cranes should comply with CPA Good Practice Guide 'Requirements for Mobile Cranes Alongside Railways Controlled by Network Rail' or the CPA Good PracticeGuide 'Requirements for Tower Cranes Alongside Railways Controlled by Network Rail'. Use of piling rigs should comply with Network Rail standard 'NR/L3/INI/CP0063 - Piling adjacent to the running line'. Note that where the compound collapse radius of a crane is within 3m of the Network Railboundary or asset, consultation with Network Rail must take place and a possession and isolation of the railway may be required. **Item 8. Issues** - Collapse of temporary works near or over the Network Rail boundary or infrastructure. **Reasons/Mitigations:**	

Stakeholder	Comment	Response
	Any temporary structures which may have the potential to collapse within 3m metres ofthe Network Rail boundary or asset will require review by Network Rail asset protection. No temporary structure may be positioned within 3m of live railway electrification equipment without further consultation with Network Rail. This development must consider the constraints for construction in close proximity to an operation station. Adequate space must be specified for temporary works which do not require platform closure. **Item 9. Issues** - Trespasses and unauthorised access onto Network Rail land. **Reasons/Mitigations:** Where required, the developer should provide (at their own expense) and thereafter maintain a fence erected on the developers side of the existing boundary fence, to a suitable minimum height and containment in accordance with Network Rail standards . Adequate space must be provided for maintenance of both the existing Network Rail boundary measures and the developers own fence. **Item 10. Issues** - Glare from light source or reflective surfaces – impact on train driver visionand visibility of signals. **Reasons/Mitigations:** Any lighting which may originate from the development (including vehicle lights) must not interfere with the sighting of signaling apparatus and/or train drivers' vision on approaching trains. The location and colour of lights must not give rise to the potential for confusion with the signaling arrangements on the railway. The developers should obtain Network Rail's Asset Protection Engineer's approval of lighting proposals. Where glazing or reflective cladding is proposed a glare assessment must be completed to determine the impact on the railway. **Item 11. Issues** - Road Vehicle Incursion. **Reasons/Mitigations:** Where there is any risk of road vehicle incursion onto the railway the risk must be mitigatedwith an effective road vehicle incursion barrier or structure designed for vehicular impact to prevent vehicles accidentally driving or rolling onto the railway or boundary fence. **Item 12. Issues** - Interface with Network Rail Structures which support the railway. **Reasons/Mitigations:** Further consultation with Network Rail is required to capture a complete set of asset ownerrequirements in a comprehensive requirements document. The design proposal presentedhere must satisfactorily address fundamental safety and operational requirements. Assetsidentified but not limited to;	

Stakeholder	Comment	Response
	HDT 7.0066 B/U 1947 Orchard Place - Owner NR HDT 7.0154 B/U 1948 Whitehall Street - Owner NR HDT 7.0176 B/S 1948A White Hart Lane Station Platform and Retaining Arches Down SideArches 1 - 22 — Owner O/P HDT 7.0330 B/U 1949 WHITE HART LANE STATION SUBWAY - Owner NRHDT 7.0352 B/U 1950 WHITE HART LANE - Owner NR **Item 13. Issues** - Effects of electrical plant or transformers on Network Rail signals orcommunications systems due to electromagnetic compatibility. The impact on the occupants of the development located within close proximity to a high voltage overhead electrification lines. **Reasons/Mitigations:** The developer will be required to undertake an Electromagnetic Interference (EMC) risk assessment to determine the potential impact the project may have on Network Rail assets. Any projects that will be within 20m or any transmitter within 100m of the operational railway will require an electromagnetic compatibility assessment, carried out in accordance with Network Rail standards 'NR/L1/RSE/30040 & 'NR/L1/RSE/30041' andNR/L2/TEL/30066' **Item 14. Issues** - Environmental pollution (Dust, noise etc.) on operational railway. **Reasons/Mitigations:** Contractors are expected to use the 'best practical means' for controlling pollution andenvironmental nuisance complying all current standards and regulations. The design and construction methodologies should consider mitigation measures to minimise the generation of airborne dust, noise and vibration in regard to the operational railway.	
Secretary of State	I confirm that we have no comments to make on the environmental statement.	
Sport England	The Proposal and Assessment against Sport England's Objectives and the NPPF Community Sports Facility Provision Although not clear, it appears that the number of proposed units quoted in the description of development differs from that mentioned in the Design & Access Statement, schedules etc. seen by Sport England.	Officers are satisfied that there is adequate sports provision in reasonable

Stakeholder	Comment	Response
	Sport England's comments, therefore, are based on the total number proposed residential units stated in the description of development it was consulted on. The planning application proposes 2,929 residential units the occupiers of which will generate demand for sporting provision. The existing provision within the area may not be able to accommodate this increased demand without exacerbating existing and/or predicted future deficiencies. Therefore, Sport England considers that new developments should contribute towards meeting the demand that they generate through the provision of on-site facilities and/or providing additional capacity off-site. The level and nature of any provision should be informed by a robust evidence base such as the Council's Playing Pitch Strategy, Built Facility Strategy or another relevant robust and upto-date needs assessment. Although there is floorspace proposed for uses failing within Use Class E (d) it is not clear what sport facilities would be provided, whether the facilities would meet existing or future local need and whether the space provided would be sufficient for the sport(s) it intends to accommodate. As a result, it would be unknown if any sport facilities provided would be sufficient to meet the sporting demands arising from the development. Changes to CIL Regulations in 2019 has resulted in the Council having the opportunity to seek contributions through CIL or via a S. 106 Agreement however it is not clear how, or if, the Council intends to mitigate the impact of the increase of sporting demand on local sport facilities. If provision for sports facilities is to be made by the CIL charge, it is acknowledged that there is no requirement to identify where those CIL monies will be directed as part of the determination of any application. That said, Sport England would encourage the Council to consider the sporting needs arising from the development as well as the needs identified in its Playing Pitch Strategy and/or any other robust borough wide sport facility strategy and direct those funds to deliver new and improved facilities for sport based on the priorities identified in those documents. In the event that the Council decides to seek provision for sports facility provision through a S. 106 agreement rather than the CIL charge then Sport England would be happy to provide further advice. To assist the Council, an estimate of the demand generated for outdoor sports provision can be provided by Sport England's Playing Pitch Calculator strategic planning tool. Team data from the Council's Playing Pitch Strategy can be applied to the Playing Pitch Calculator which can then assess the demand generated in pitch equivalents (and the associated costs of delivery) by the population generated in a new residential development. It can also calculate changing room demand to support the use of this pitch demand. In relation to built sport facilities, Sport England's established Sports Facilities Calculator (SFC) can help to provide an indication of the likely demand that will be generated by a development for certain sports facility types. The SFC indicates that a population of 7,030 (calculated by multiplying the number of residential units by the average occupation rate of 2.4) in the London Borough of Haringey would generate a demand for 0.53 sports halls (£1,732,292), 0.37 swimming pools (£1,847,279), 0.23 artificial grass pitches	proximity to the application site and that the proposed development will make a proportionate contribution to informal sports provision.

Stakeholder	Comment	Response
	(£305,569 if 3G or £277,930 if sand) and 0.07 rinks of an indoor bowls centres (£33,173). Consideration should be given by the Council to using the figures from the Sports Facility Calculator for informing the level of any financial contribution if indoor sports provision was to be made through a S.106 agreement. Active Design Sport England, in conjunction with Public Health England, has produced 'Active Design' (October 2015), a guide to planning new developments that create the right environment to help people get more active, more often in the interests of health and wellbeing. The guidance sets out ten key principles for ensuring new developments incorporate opportunities for people to take part in sport and physical activity. The Active Design principles are aimed at contributing towards the Government's desire for the planning system to promote healthy communities through good urban design. Sport England would commend the use of the guidance in the master planning process for new residential developments. The document can be downloaded via the following link: https://www.sportengland.org/how-we-can-help/facilities-and-planning/design-and-cost-guidance/activedesign	
Transport for London	Thank you for consulting TfL. As previously indicated, the development site is located directly adjacent to White Hart Lane Station and immediately to the west of the A1010 High Road, which forms part of the Strategic Road Network (SRN). While the Local Planning Authority is the Highway Authority for this road, 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. After reviewing the updated case documents, 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 10th February 2022. Considering that the applicant has already responded to TfL's detailed comments, it should be further noted that I will send a follow-up email setting out any specific aspects of our response in due course. • For TfL is very important to keep track of the cumulative impact of development on the local and wider transport network. The applicant's commitment to ensure appropriate information about cumulative development in the area is included, specifically development in the wider context of the HRW masterplan area, is welcomed. • The accompanying 'Chapter 15, Transport & Access ES' addendum report suggests that there will be no change to the methods used in the proposed assessment. As set out by the addendum report, TfL acknowledges this chapter has been informed by the original ES and corresponding Transport Assessment, as well as the Outline Delivery and Servicing Plan; Residential Travel Plan; Framework Travel Plan; and Outline Construction Environmental Management Plan. Existing requirements relating to the preparation of all these documents are to remain unchanged.	Planning conditions and obligations are proposed to ensure that the proposal does not have an adverse impact on transport infrastructure.

Stakeholder	Comment	Response
	Public transport service frequencies should be consistent with those agreed through pre-application communications with TfL, including the TfL Strategic Modelling team. This includes London Overground (LO) train and bus service frequencies. The applicant must ensure this assessment and analysis reflect representative/agreed public transport conditions. The London Plan Policy T5, sets out cycle parking standards to help remove barriers to cycling and create a healthy environment in which people choose to cycle. Considering the detailed element of the scheme and submitted plans for Plot A, TfL has concerns about the cycle parking, specifically building A1 and the lack of provision of spaces for larger cycles for long-stay cyclists. Given that the schedule of accommodation sets out that all wheelchair accessible homes will be contained within building A1, TfL encourage the applicant to review the cycle parking and incorporate adequate provision within building A1 to cater specifically for non-standard bicycles. This should consider riders of certain type of bicycles, including people who use handcycles, tricycles, tandems and models adapted to suit the rider's specific needs, as well as cargo cycles. Further consideration should also be given to short-stay cycle parking provision for buildings A2 and A3, as spaces for visitors located in the landscape, adjacent to building A1's entrance are too remote from other user destinations, particularly building A3's entrance. All cycle parking is required to be designed and laid out in accordance with the London Cycling Design Standards (LCDS). Subject to the above comments and issues raised being addressed satisfactorily, the updated case documents appear acceptable from a Spatial Planning perspective. Therefore, TfL have no further comments on this application. I write to provide detailed strategic transport comments on this application reference HGY/2021/3175. These provide more detail on the matters raised in the GLA Stage 1 Planning Report GLA/2021/1215/S1/01 dated 7th February 2022. Please note that these are additional also to any response you may have received from my colleagues in infrastructure or asset protection and from TfL as a party with a property interest. This response relates to a hybrid planning application for the '1) outline component comprising the demolition of existing buildings and for the creation of a new mixed-use development including residential (Use Class C3), commercial, business and service (Use Class E), leisure (Use Class E), community uses (Use Class F1/F2) and Sui Generis uses together with the creation of a new public square, park and associated access, parking and public realm works with matters of layout, scale, appearance, landscaping and access within the site reserved for subsequent approval; and 2) detailed component comprising Plot A including the demolition of existing buildings and the creation of 60 residential units (Use Class C3) together with landscaping, parking and other associated works'. Please note that the following comments represent the view of 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. **Site Description and Context**	

Stakeholder	Comment	Response
	The site comprises three portions of multiple land ownership, situated on both sides of the Lea Valley railway line. The two larger portions (Outline element), which are separated by White Hart Lane, are bounded by the railway viaduct to the west, the A1010 High Road to the east (beyond which lies Tottenham Hotspur Football Club Stadium), Brereton Road to the south and Brook House Primary School to the north. A smaller portion (Detailed element) to the west of the railway tracks is also included, comprising Whitehall Lodge and the Whitehall and Tenterden Community Centre. The nearest points of vehicular access to the TLRN from the site are the A10 Bruce Grove / A1010 High Road junction and the A406 North Circular Road / A1010 Fore Street junction, located approximately 1km to the south and north respectively. The A1010 High Road, which forms part of the Strategic Road Network (SRN), is located directly adjacent to the site. White Hart Lane station (London Overground and Greater Anglia services) is located adjacent to the site, approximately 200m distance from the Whitehall Mews scheme. Northumberland Park station (National Rail services) and Seven Sisters station (London Underground Victoria Line and London Overground) are located approximately 1km to the east and 3km south of the site respectively. Bus routes in vicinity of the site include five daytime bus routes with bus stops along the A1010 High Road, White Hart Lane and Northumberland Park. The site has varying PTALs with values ranging between 3 on the north and the southwestern edges of the site and 5 on the interior of the site near White Hart Lane. Cycleway 1 (From Tottenham to Liverpool Street) is located approximately 400m south of the development site. This application comprises a detailed element (also known as 'Plot A') which represents the first phase of development of the comprehensive regeneration of High Road West and consists of 60 residential dwellings, comprising entirely of decanted residents; together with landscaping, parking and other associated works and for which no matters are reserved; and an outline element for which all matters except access into the High Road West site (also known as 'The Site') are reserved. This development proposal is part of a comprehensive regeneration of High Road West that will deliver up to 2,929 residential dwellings and 36,000 sqm of non-residential floorspace, including new retail, office, leisure and community uses. **Access and Delivery and Servicing Arrangements** Access by all modes will be accommodated via Tenterden Road, Church Road, White Hart Lane and the A1010 High Road. This includes vehicular access routes through a series of one-way restricted (residents only) and unrestricted access andservicing streets, as well as residential streets. The proposals for the outline element also include a new north-south cycleway through the development site on the eastern side of the railway line and key pedestrian routes, namely, Moselle Walk, which connects Brereton Road to the new Moselle Square, leading into the Tottenham Hotspur Football Club (THFC) stadium; and a major pedestrian route running through the centre of the northern site, which then would also connect through to the southern site via William Street, Moselle Square and Coombes Lane.	

Stakeholder	Comment	Response
	Pedestrian access to the detailed element is taken from Whitehall Street, Headcorn Road and Tenterden Road. The primary access route to the residential blocks of the detailed element will be accommodated through Whitehall Mews, which is to be pedestrianised. Whilst proposals for the internal street network are subject to detailed approval, the applicant is encouraged to identify any improvements, no matter how small, in order to make a possible contribution to the delivery of Healthy Streets and Vision Zero policies, specifically the route under the bridge along Whitehall Street to support the detailed element. Development proposals should enhance permeability and connectivity between the residential dwellings to the west of the railway tracks and non-residential components and provide for safe and secure movement, particularly for people walking and cycling. Improvements could consider possible techniques to rebalance priorities and increase active travel awareness along this route, including well designed lighting, opportunities for soft landscaping, potential surface treatment and wayfinding. The majority of the development will be serviced through a series of public two-way and one-way streets within the proposed internal network. However, a number of designated shared surface lanes are proposed, allowing restricted access to servicing routes to accommodate service, emergency and larger vehicles along routes otherwise only open to pedestrians and cyclists. Stage 1 Road Safety Audit (RSA) along all shared surface lanes should be completed prior to determination. TfL welcomes the applicant's approach to safeguard potential future links along the northern edge of the outline element and the neighbouring Cannon Road. **Healthy Streets, Vision Zero, Walking and Cycling** The development proposals will see an increase in pedestrian and cycle trips to/from the site and the local area, as well as public transport trips. The Active Travel Zone (ATZ) section appropriately includes a casualty analysis of clusters of KSIs along key routes and destinations and potential improvements. However, there is limited detail on how the new major pedestrian route, which will predominantly be pedestrian focused throughout the day following a key desire line between White Hart Lane station and the stadium, will impact on the bus stop (T) on High Road, including its current location, bus stop environment and passenger waiting area. Whilst the TA provides some useful detail in relation to Moselle Square spatial requirements in the context of crowd flow and major event operations, which is welcomed, full consideration of the implications specifically for users of the bus stop under all anticipated operating conditions along the new pedestrian route should be incorporated. This should include matchdays and non-football events, as well as operations of this route under normal conditions. Whilst the internal street network and how different components of this network will tie up into the surrounding streets are subject to a future Reserved Matters Application (RMA), clarification is required in relation to how this major pedestrian route achieves a seamless interface, particularly with the A1010 High Road. In addition, full consideration should be given to walking and cycle connectivity between areas to the north and the south of White Hart Lane, including White Hart Lane Station. Consistent with TfL's pre-application advice, Healthy Streets Check for Designers (HSCD) needs to be completed for both the base and future situation for routes being wholly or mainly delivered as	

Stakeholder	Comment	Response
	part of the RMA. The applicant is recommended to complete Road Safety Audits (RSA) whenever there is clear potential for conflict between vehicles and vulnerable road users. In line with policies T2 Healthy Streets and T3 Transport Capacity, Connectivity and Safeguarding of the London Plan, development proposals should connect to local/wider walking and cycling networks, and enable and deliver improvements to provide safe, inclusive and convenient connections for people. This includes ensuring the bus network can operate efficiently to, from and within the development, giving priority to buses, all passengers and supporting infrastructure as needed. Subject to a future RMA, wayfinding, possibly Legible London, is to be provided. The principle of providing wayfinding and adopting layouts that prioritise pedestrian and cycle movements, including new walking and cycling routes is welcomed. However, the proposals should provide sufficient on-site space for safe, convenient, direct and accessible access/routes for pedestrians and cyclists, particularly when considering one-way streets and related traffic arrangements from a cyclist perspective. As part of the RMA, the applicant is recommended to review proposed primary and secondary pedestrian routes together with the north-south cycle route arrangement to ensure the proposals promote simple and more convenient means of accessing public transport networks and create a safer and more direct environment that is easier to navigate and move around by walking and cycling at all times, especially by disabled people. **Car Parking** Whilst there is no car parking provision within the detailed element boundary, a permit allocation scheme will operate for residents to park within the Tottenham North Controlled Parking Zone (CPZ), as the detailed element consists solely of decanted residents. However, this proposal excludes parking bays along Headcorn Road and Tenterden Road, where residents will not be permitted to park. Development proposals restrict new residents to accessible spaces only. Two on-street disabled persons' car parking spaces (three per cent) will be provided along Whitehall Street, immediately to the south-east of the proposed buildings. Additional disabled persons' car parking spaces, equivalent to seven per cent of the dwellings could be provided should the initial provision be insufficient. A point of concern is raised over the distance additional spaces are from residential dwellings. However, this is due to the highway constraints in this location so is largely acceptable, subject to the provision of a safe, convenient, direct and accessible access route. Disabled persons parking bays should be positioned to minimise the travel distance from the vehicle to the main entrance of buildings. In addition, there are concerns over the access route under the bridge and safety, specifically for disabled users. The applicant should ensure that on street parking, particularly along Whitehall Street, is not dominant in the street scene nor disrupt desire lines. Clarification on the proposed pedestrian amenity/mitigation is required. Based on the outcome of a telephone survey of existing residents, the estimated ratio of vehicle ownership within the site equates to approximately 0.43 spaces per residential unit. Therefore, forecast demand for the detailed element is	

Stakeholder	Comment	Response
	estimated to be at around 26 car parking spaces. Subject to a future RMA, the development proposals will provide car club provision of up to ten spaces, which should be secured by legal agreement. In line with the Mayor's Transport Strategy (MTS) and the London Plan, clarification is necessary to demonstrate how the overall car parking provision/supply is being capped, as a result of the creation of car club spaces, allowing the local area to reduce its future dominance on private cars. Electric vehicle charging provision will be afforded in excess of the London Plan requirement that dictates 20% active provision and the remaining spaces fitted with passive provision. This proposal, which is welcomed in line with London Plan policy T6.1, must be applied and secured by condition. It should be noted that physical infrastructure should not negatively affect pedestrian amenity in line with policy T6 Car Parking of the London Plan. This is particularly important, given the need to re-provide car parking spaces through a combination of on street spaces on public and private roads, and within plots; and a noticeable increase in pedestrian trips to/from the site and the local area, as well as the proximity to the stadium. Therefore, clarification is necessary to demonstrate where on-street charging points will be located and how the proposals will achieve the safe and efficient use of the pedestrian amenity. As per TfL's pre-application advice, any replacement car parking needs to be provided for the occupancy of the returning resident only and be secured by legal agreement along with the requirement to produce a Car Parking Management Plan (CPMP), which will detail how the spaces will be monitored, managed and enforced. After that, a permit-free obligation should be secured to prevent any new occupier access to the on-street car parking provision within the CPZ, other than the disabled spaces as agreed. For the outline element, car parking is proposed via mix of on-street perpendicular and parallel arrangement, ground floor podium structures, parking courts and basements. Whilst TfL supports the principle that the parking strategy will minimise the impact of on street parking through the provision of spaces that are limited to small groups of vehicles to allow planting and street trees between groups, the applicant is recommended to design out the requirement for turning and reversing manoeuvres of motorised vehicles, specifically linked to perpendicular car parking spaces. Further work is required to address TfL's concerns. **Cycle Parking** As part of the detailed element a total of 119 long-stay and 4 short-stay cycle parking spaces is proposed to be situated within residential block podiums in formal cycle stores and the public realm respectively. Whilst this number accords with the London Plan minimum cycle parking standards, further details on the cycle parking provision is required, which could be secured by condition. This includes the total number and the exact location of cycle parking provision for all uses (i.e. scaled drawings). This provision needs to consider a variety of stands suitable for all users and all types of cycles. All cycle parking must be in accordance with the London Cycling Design Standards (LCDS), including at least 20% Sheffield stands and a further 5% wider spaces for non-standard bicycles. **Trip Generation and Highway and Public Transport Impact Assessment**	

Stakeholder	Comment	Response
	Whilst TfL welcomes the assessment is largely consistent with pre-application advice, a detailed justification for the selection of residential sites from TRICS is missing from the TA. TfL has concerns about the assumptions and proposed bus trip generation figures. Clarification of the trip generation (Chapter 5) and public transport (Chapter 7) sections is required, as set out in the detailed response. Further work is required to address TfL concerns. Whilst not agreeing entirely with the proposed selection of residential sites to help inform the assessment of the trip generation for the proposed development, which exclusively mirrors a previous application within the Goods Yard site, specifically PTALs and survey years, person trip rates identified from the TRICS database appear to be within a reasonable range. Clarification is required on the trip generation section, as the total number of residential dwellings used for this assessment appears to vary between paragraphs 5.1.1.2 (i.e. 2,977 residential units, which are noted to be in excess of the proposed maximum of 2,929 units to be delivered and the 2,612 residences as part of the illustrative scheme information and set out in Table 4.3,) and 5.1.2.3 (i.e. 2,680 residential units that are used to estimate total person trip generation figures). The application needs to state parameters and assumptions clearly. This includes the precise number of additional residential dwellings assumed for the transport assessment, taking into account new housing, replacement, preservation or a combination. Clarification is also required on the proposed bus trip generation figures, as a number of bus frequencies in Table 2.2 are incorrect. Therefore, the applicant is required to provide updated bus trip generation figures with re-allocated trips based on the following considerations. Whilst route W3 runs at 10 bph, during peak hours route 149 runs at 9 bph, route 259 runs at 6 bph, route 279 runs at 11 bph and route 349 runs at 6 bph. For reference, route 318 runs at 5 bph. Table 7.21 provides bus trip generation figures by bus route and direction. However, a number of the routes in Table 7.21 are not within a reasonable distance of the development. New trip numbers would therefore be negligible and should be excluded as follows: • Routes 123 and 243: The nearest bus stops are located on Bruce Grove at a walking distance of approximately 930m from the site boundary – with a greater distance for much of the development site. High frequency same-stop interchange is available between routes 123 and 243 – and routes 149, 259, 279 and 349. As such, it is expected that the trips forecast for the 123 and 243 would be made on the latter four routes. • Routes 341 and 476: The nearest bus stops are located on Tottenham High Road south of Lansdowne Road at a walking distance of approximately 630m from the site boundary – with a greater distance for much of the development site. High frequency same-stop interchange is available between routes 341 and 476 – and routes 149, 259, 279 and 349. As such, it is expected that the trips forecast for the 341 and 476 would be made on the latter four routes. • Routes 444 and 491: The nearest bus stop is located on Bridport Road at a walking distance of up to approximately 850m from the site boundary – with a greater distance for much of the development site. It is reasonable for these trips to be discounted and reallocated to the closer bus network.	

Stakeholder	Comment	Response
	In terms of LO service frequencies, clarification is also required on the frequency applied during the AM peak hour (7 tph in total, as set out in Table 2.3), as this frequency is not representative and in fact it is only achieved between 06:44 and 07:38 (Timed at White Hart Lane), which is before the time at which the peak hour flow is observed on this route. This point of concern is particularly important, as a service frequency reflecting the standard peak service pattern needs to be assumed for the AM peak hour capacity assessment - i.e. 6 tph, equivalent to 4 and 2 tph to Enfield Town and Cheshunt respectively. Notwithstanding the outcome of the applicant's clarifications, TfL recognises that a more robust uplift in residential trips generated by this development, based on the most relevant and latest multi-modal data available, is unlikely to make a noticeable difference on the net impact of development proposals and to have a significant impact on the strategic road network. Given the effect of a recent congestion relief project completed at White Hart Lane station and TfL's own analysis, based on planning permissions sought since Summer 2020, it is confirmed that the proposals will not require mitigation on the LO network. However, the applicant is required to provide updated bus trip generation figures. Subject to the outcome of any additional assessment, TfL may seek mitigation towards enhancing bus priority measures and/or fund infrastructure upgrades. **TfL Technical Approval and Infrastructure Protection** Given the proximity of the site to Rail for London (RfL) infrastructure and operations, the applicant needs to consider the importance of identifying the risks associated with working on/near the railway and ways of mitigating those risks. This includes our design preference to avoid balconies or fully opening windows facing the railway and the associated risk of items falling or being thrown onto the railway; proposed maintenance arrangements for the future development (i.e. window/façade cleaning proposals requiring inherently risky access techniques such as abseiling); drainage (i.e. water management should operate away from the railway); any additional fencing required on the railway boundary, which must be independent of RfL's fencing and allow room for maintenance of both fences; use of scaffolding and the requirement to submit a Crane/Lifting Management Plan for approval by the Council in consultation with RfL. This requirement that is normally dealt with by Network Rail should be secured by condition. Whilst TfL have no objection in principle to the proposed development in relation to the site's adjacency to the railway lines, the future planning consent should include appropriate infrastructure and operational protection measures. TfL requires that the applicant enters into an Asset protection Agreement with RfL. **Travel Plan** The submitted outline residential Travel Plan (TP) and Framework Travel Plan (FTP) for the non-residential uses are generally acceptable. The focus on active travel is welcomed. The final TP and FTP and all agreed measures should be secured, enforced, monitored and reviewed through the Section 106 agreement, in accordance with Policy T4 Assessing and mitigating transport impacts of the London Plan. **Delivery and Servicing and Construction Logistics**	

Stakeholder	Comment	Response
	The outline Delivery and Servicing Plan (DSP) and outline Construction Environmental Management Plan (CEMP) along with the Operational Waste Management Strategy are welcomed and the contents of these documents are found to be broadly acceptable. Due to the phased nature of this development proposal (within a multiple land ownership site) with this detailed element being the first phase of a long-term and comprehensive regeneration of High Road West to be delivered by the applicant, this application will require the adoption of a coherent wayfinding strategy to enable people to access and find the stadium and other key local attractor destinations. The RMA should make clear how the development and construction operations will be managed alongside the continuation of the operations of the stadium and other key local attractors. The full DSP and CEMP, which needs to include infrastructure protection measures in respect of the adjacent railway lines, should be produced in accordance with TfL guidance and secured by condition. This is particularly important, as High Road is a key bus corridor and safe site access during construction should fully consider the impact on the surrounding community, including the stadium and St. Francis de Sales Catholic Infant and Junior School. 04.02.2022 Thank you for consulting TfL. As previously indicated, the development site is located directly adjacent to White Hart Lane Station and immediately to the west of the A1010 High Road, which forms part of the Strategic Road Network (SRN). While the Local Planning Authority is the Highway Authority for this road, 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. After reviewing the updated case documents, 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 10th February 2022. Considering that the applicant has already responded to TfL's detailed comments, it should be further noted that I will send a follow-up email setting out any specific aspects of our response in due course. • For TfL is very important to keep track of the cumulative impact of development on the local and wider transport network. The applicant's commitment to ensure appropriate information about cumulative development in the area is included, specifically development in the wider context of the HRW masterplan area, is welcomed. • The accompanying 'Chapter 15, Transport & Access ES' addendum report suggests that there will be no change to the methods used in the proposed assessment. As set out by the addendum report, TfL acknowledges this chapter has been informed by the original ES and corresponding Transport Assessment, as well as the Outline Delivery and Servicing Plan; Residential Travel Plan; Framework Travel Plan; and Outline Construction Environmental Management Plan. Existing requirements relating to the preparation of all these documents are to remain unchanged.	

Stakeholder	Comment	Response
	• Public transport service frequencies should be consistent with those agreed through pre-application communications with TfL, including the TfL Strategic Modelling team. This includes London Overground (LO) train and bus service frequencies. The applicant must ensure this assessment and analysis reflect representative/agreed public transport conditions. • The London Plan Policy T5, sets out cycle parking standards to help remove barriers to cycling and create a healthy environment in which people choose to cycle. Considering the detailed element of the scheme and submitted plans for Plot A, TfL has concerns about the cycle parking, specifically building A1 and the lack of provision of spaces for larger cycles for long-stay cyclists. Given that the schedule of accommodation sets out that all wheelchair accessible homes will be contained within building A1, TfL encourage the applicant to review the cycle parking and incorporate adequate provision within building A1 to cater specifically for non-standard bicycles. This should consider riders of certain type of bicycles, including people who use handcycles, tricycles, tandems and models adapted to suit the rider's specific needs, as well as cargo cycles. Further consideration should also be given to short-stay cycle parking provision for buildings A2 and A3, as spaces for visitors located in the landscape, adjacent to building A1's entrance are too remote from other user destinations, particularly building A3's entrance. All cycle parking is required to be designed and laid out in accordance with the London Cycling Design Standards (LCDS). **Subject to the above comments and issues raised being addressed satisfactorily, the updated case documents appear acceptable from a Spatial Planning perspective. Therefore, TfL have no further comments on this application.**	
Themes Water	Waste Comments Thames Water would advise that with regard to FOUL WATER sewerage network infrastructure capacity, we would not have any objection to the above planning application, based on the information provided. The application indicates that SURFACE WATER (North of White Hart Lane) will NOT be discharged to the public network and as such Thames Water has no objection, however approval should be sought from the Lead Local Flood Authority. Should the applicant subsequently seek a connection to discharge surface water into the public network in the future then we would consider this to be a material change to the proposal, which would require an amendment to the application at which point we would need to review our position. There are public sewers crossing or close to your development. If you're planning significant work near our sewers, it's important that you minimize the risk of damage. We'll need to check that your development doesn't limit repair or maintenance activities, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes.	Planning conditions and informatives are proposed to ensure that the proposal does not have an adverse impact on water infrastructure.

Stakeholder	Comment	Response
	https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-nearor-diverting-our-pipes. Thames Water would recommend that petrol / oil interceptors be fitted in all car parking/washing/repair facilities. Failure to enforce the effective use of petrol / oil interceptors could result in oil-polluted discharges entering local watercourses. As per Building regulations part H paragraph 2.21, Drainage serving kitchens in commercial hot food premises should be fitted with a grease separator complying with BS EN 1825-:2004 and designed in accordance with BS EN 1825-2:2002 or other effective means of grease removal. Thames Water further recommend, in line with best practice for the disposal of Fats, Oils and Grease, the collection of waste oil by a contractor, particularly to recycle for the production of bio diesel. Failure to implement these recommendations may result in this and other properties suffering blocked drains, sewage flooding and pollution to local watercourses. Please refer to our website for further information: www.thameswater.co.uk/help Water Comments There are water mains crossing or close to your development. Thames Water do NOT permit the building over or construction within 3m of water mains. If you're planning significant works near our mains (within 3m) we'll need to check that your development doesn't reduce capacity, limit repair or maintenance activities during and after construction, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-nearor-diverting-our-pipes	
Metropolitan Police Service Design Out Crime Officer	***Detailed Element*** ***Section 1 - Introduction:*** Thank you for allowing us to comment on the above planning proposal, please note that due to the nature of a Hyb Application and the breadth of information required, this response will be in 2 parts. This response will focus on the deta element of Block A within the application under police reference NE4188. Part one (1) was dealt under police refere NE6136. With reference to the above application we have had an opportunity to examine the details submitted and would like to o the following comments, observations and recommendations. These are based on relevant information to this site (Plea see Appendices), including my knowledge and experience as a Designing Out Crime Officer and as a Police Officer. It is in our professional opinion that crime prevention and community safety are material considerations because of the mi use, complex design, layout and the sensitive location of the development. To ensure the delivery of a safer developm	Planning conditions are proposed to ensure that the proposal meets secure by design accreditation.

Stakeholder	Comment	Response
	in line with L.B. Haringey DMM4 and DMM5 (See Appendix), we have highlighted some of the main comments we have relation to Crime Prevention (Appendices 1). We have met with the project Architects to discuss Crime Prevention and Secured by Design (SBD) for Block A and ha discussed our concerns around the design and layout of Block A. The Architects have made mention in the Design a Access Statement with reference to design out crime or crime prevention and have stated that they will be working in cl collaboration with DOCOs to ensure that the development is designed to reduce crime at detailed design stage. At this p it can be difficult to design out fully any issues identified. At best crime can only be mitigated against, as it does not f reduce the opportunity of offences. Whilst in principle we have no objections to the site, we have recommended the attaching of suitably worded conditions a an informative. The comments made can be easily be mitigated early if the Architects ensure the ongoing dialogue with department continues throughout the design and build process. This can be achieved by the below Secured by Des conditions being applied (Section 2). If the Conditions are applied, we request the completion of the relevant SBD applicat forms at the earliest opportunity. The project has the potential to achieve a Secured by Design Accreditation if advice given is adhered to. ***Section 2 - Secured by Design Conditions and Informative:*** In light of the information provided, we request the following Conditions and Informative: **Conditions:** A. Prior to the commencement of above ground works of each building or part of a building, details shall be submitted to and approved, in writing, by the Local Planning Authority to demonstrate that such building or such part of a building can achieve **'Secured by Design' Accreditation**. Accreditation must be achievable according to current and relevant **Secured by Design** guide lines at the time of above grade works of each building or phase of said development. The development shall only be carried out in accordance with the approved details. B. Prior to the first occupation of each building or part of a building or its use, **'Secured by Design'** certification shall be obtained for such building or part of such building or its use and thereafter all features are to be retained. C. **Informative:**	

Stakeholder	Comment	Response
	The applicant must seek the continual advice of the Metropolitan Police Service Designing Out Crime Officers (DOCOs) achieve accreditation. The services of MPS DOCOs are available **free of charge** and can be contacted via docomailbox.ne@met.police.uk or 0208 217 3813. ***Section 3 - Conclusion:*** We would ask that our department's interest in this planning application is noted and that we are advised of the final **Decis Notice**, with attention drawn to any changes within the development and subsequent Condition that has been implemen with crime prevention, security and community safety in mind. Should the Planning Authority require clarification of any of the recommendations/comments given in the appendices plea do not hesitate to contact us at the above office. **Outline Element** ***Section 1 - Introduction:*** Thank you for allowing us to comment on the above planning proposal, please note that due to the nature of a Hyb Application and the breadth of information required, this response will be in 2 parts. This response will focus on the Out element of the application in Part (One) 1 and the detailed response for Plot A will follow in Part (Two) 2 under NE 4 reference. With reference to the above application we have had an opportunity to examine the details submitted and would like to o the following comments, observations and recommendations. These are based on relevant information to this site (Plea see Appendices), including my knowledge and experience as a Designing Out Crime Officer and as a Police Officer. It is in our professional opinion that crime prevention and community safety are material considerations because of the mi use, complex design, layout and the sensitive location of the development. To ensure the delivery of a safer developm in line with L.B. Haringey DMM4 and DMM5 (See Appendix), we have highlighted some of the main comments we have relation to Crime Prevention (Appendices 1). We have met with the project Architects to discuss Crime Prevention and Secured by Design (SBD) for the overall masterp and have discussed concerns around counter terrorism & crowd control. The Architects have made mention in the Des and Access Statement with reference to design out crime or crime prevention and have stated that they will be working close collaboration with DOCOs and CTSAs to ensure that the developed is designed to reduce crime at detailed des stage. At this point it can be difficult to design out fully any issues identified. At best crime can only be mitigated agai as it does not fully reduce the opportunity of offences.	

Stakeholder	Comment	Response
	Whilst in principle we have no objections to the site, we have recommended the attaching of suitably worded conditions a an informative. The comments made can be easily be mitigated early if the Architects ensure the ongoing dialogue with department continues throughout the design and build process. This can be achieved by the below Secured by Des conditions being applied (Section 2). If the Conditions are applied, we request the completion of the relevant SBD applicat forms at the earliest opportunity. The project has the potential to achieve a Secured by Design Accreditation if advice given is adhered to. ***Section 2 - Secured by Design Conditions and Informative:*** In light of the information provided, we request the following Conditions and Informative: **Conditions:** D. Prior to the commencement of above ground works of each building or part of a building, details shall be submitted to and approved, in writing, by the Local Planning Authority to demonstrate that such building or such part of a building can achieve **'Secured by Design' Accreditation**. Accreditation must be achievable according to current and relevant **Secured by Design** guide lines at the time of above grade works of each building or phase of said development. The development shall only be carried out in accordance with the approved details. E. Prior to the first occupation of each building or part of a building or its use, **'Secured by Design'** certification shall be obtained for such building or part of such building or its use and thereafter all features are to be retained. F. Commercial aspects of the development must achieve the relevant **Secured by Design Accreditation** at the final fitting stage, prior to residential occupation of such building in accordance with condition B (Secured by Design) and commencement of business. Details shall be submitted to and approved, in writing, by the Local Planning Authority G. Measures to mitigate against counter terrorism activities plus crowd control during events must be implemented according to Metropolitan Police Guidelines and advice during the lifetime of the development and upon final development completion. (Note - this information will not be shared in the public domain once provided). **Informative:**	

Stakeholder	Comment	Response
	The applicant must seek the continual advice of the Metropolitan Police Service Designing Out Crime Officers (DOCOs) achieve accreditation. The services of MPS DOCOs are available **free of charge** and can be contacted via docomailbox.ne@met.police.uk or 0208 217 3813. ***Section 3 - Conclusion:*** We would ask that our department's interest in this planning application is noted and that we are advised of the final **Decis Notice**, with attention drawn to any changes within the development and subsequent Condition that has been implemen with crime prevention, security and community safety in mind. Should the Planning Authority require clarification of any of the recommendations/comments given in the appendices ple do not hesitate to contact us at the above office. Yours sincerely, **Lee Warwick 463TP** Designing Out Crime Officer Metropolitan Police Service This report gives recommendations. Please note that Crime Prevention Advice and the information in this report does n constitute legal or other professional advice; it is given free and without the intention of creating a contract or without the intention of accepting any legal responsibility. It is based on the information supplied and current crime trends in the are All other applicable health, safety and fire regulations should be adhered to **Appendix 1: Concerns and Comments** In summary we have overall site specific comments in relation to the following items. This list is not exhaustive and ac initial observations on the masterplan based on the available plans from the architect and local authority planning portal Site specific advice may change depending on further information provided or site limitations as the project develops: In summary we have site specific comments and concerns in relation to the following items. This list is not exhaustive and acts as initial observations from the Plans. Site specific advice may change depending on further information or site limitations as the project develops:	

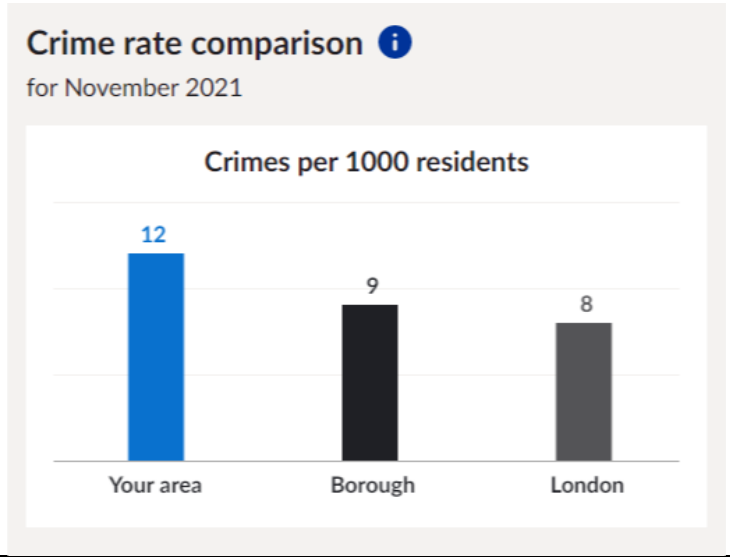
Stakeholder	Comment	Response
	General **CTSA measures –** Evidence supporting the implementation of CT measures should be further discussed with the CTSAs as the development progresses. This can be ensured via an appropriately worded CT condition in conjunction with the CTSA. Anything installed must meet the security needs for the site and adaptable for future events and or concerns. **Crowd control measures –** Physical measures to assist control of large crowds should be implemented during the building phase and for the completion of the development. **Lighting** – It is unclear exactly what levels of illumination is provided for the external aspects at this time. A lux plan should be provided to encourage overall uniformity of lighting and reduce the likelihood of hiding places or dark spots and make public walkways as visually open and safe as possible. This should be to the latest BS 5489 standard and the design engineer should have a competency to level 3 and 4 of the Institution of Lighting Professionals (ILP) Scheme shown. Dusk till dawn photoelectric cells with ambient white lighting via directional down-lighting columns is advised for best lighting practice. Bollard lighting as a primary light source is not supported as it does not provide suitable illumination and creates an "up lighting effect" making it difficult to recognise facial features and thus increase the fear of crime. **CCTV** – Data logging and CCTV will be paramount for the site to assist management when dealing with any issues during events and the day to day running of development. A CCTV strategy for the site should be reviewed at the earliest opportunity to not only protect the different buildings within the design, but the main walkways/pathways that run through the design**.** This should be installed to BS EN 50132-7:2012+A1:2013 standard, co-ordinated with the planned lighting system, contained within vandal resistant housing, to record images of evidential quality (including at night time) that are stored for a minimum of 30 days on a locked and secure hard drive or a remote cloud system. Appropriate signage should also be included highlighting its use. **Cycle Storage –** We recommend that there should be 3 points of locking for the bikes and signage for residents advisin lock their bikes appropriately. The bike store should not be advertised from the outside to further deter opportunistic cri and access should only be provided to those who register with the Managing Agency. Bike stands should have three points of locking and signage put up advising people to lock them securely. External signage should not advertise the usage of this space to try and reduce opportunistic theft. External cycle racks should be positioned to avoid usage as seating or located. **Vehicle Routes** – It is important to ensure that routes into and around the site not only meet SBD/CT requirements, but that the Police Traffic Management Unit (TMU) have reviewed the measures and are satisfied. **Doors and windows -** SBD Approved Doors and windows (as recommended by the DOCO) are advised to ensure this and will need to be reviewed across the site once a final design has been agreed by the Local Authority. This will	

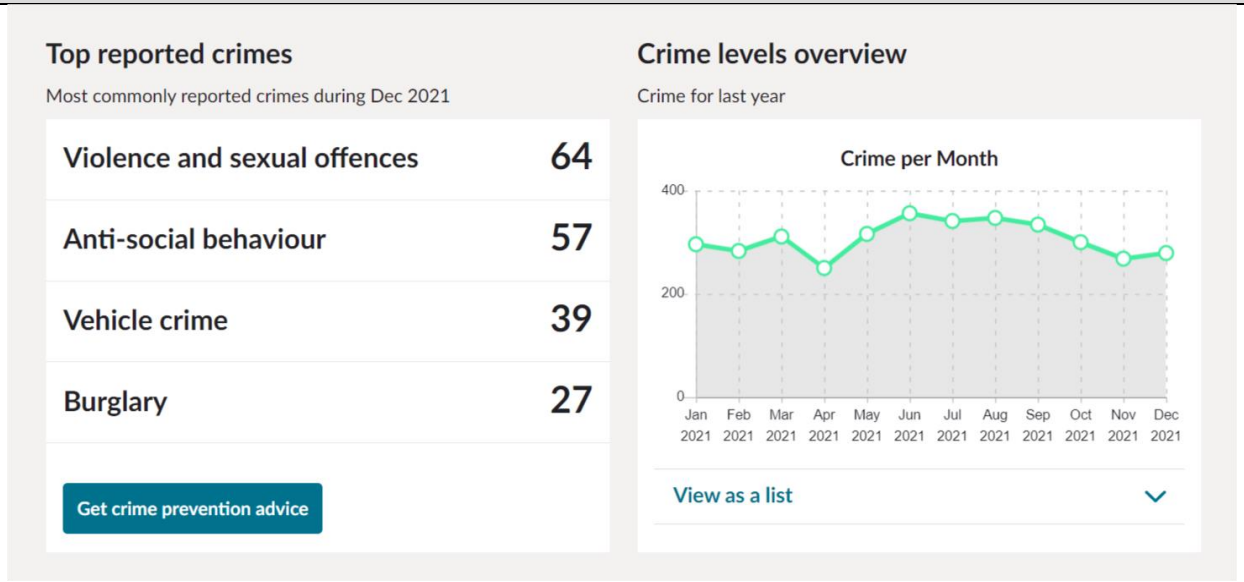
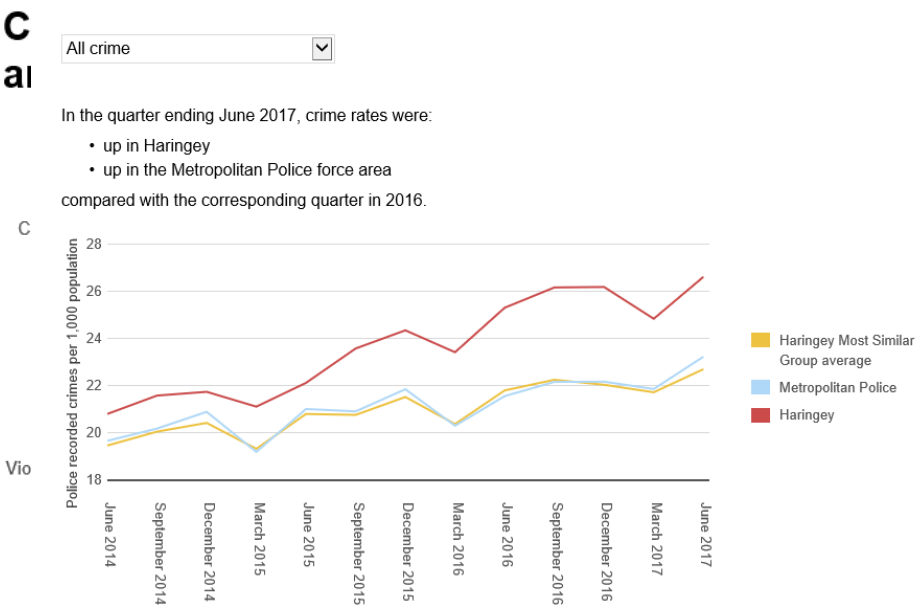
Stakeholder	Comment	Response
	also need to be reviewed against any Heritage requirements for the site which could impact on certified products being installed. **Pathways/Walkways –** As the concept of the design is to provide safe spaces for people to walk and cycle at all times, it will be important to ensure all pathways allow good visibility, are wide, are a straight as possible, are well lit and are covered by adequate CCTV. **Climbing Aids –** Whilst climbing aids on the whole are not within the design, every effort should be made to ensure that the design does not inadvertently create opportunities to climb up to roof, balcony or amenity spaces. Review of the distances and materials should be taken into account across the site and designed in such a way that it cannot become a climbing aid. **Access Control Strategy –** The reduction in routes into any building and floor by floor access control to the different uses (including upper level garden spaces) is supported. As the project develops further, further discussions into ensuring that this is appropriate for the site (considering its complex and multi-use functions) will be important to avoid permeability issues. Ongoing discussions are recommended in case of any changes to the floor layouts and functions that may affect original advice **Residential and Commercial** **Outline Application –** The design concepts show basic plans for the layouts of the buildings, but are likely to go through alterations to layouts as their design progresses. **Whilst the general layouts appear on the whole suitable, the below comments are to aid the design teams to fine tune their proposals in line with SBD Guidance.** **Compartmentation –** The design currently allows access for a high volume of residents into multiple cores within multiple Blocks and the necessity of compartmentation and level by level access control will be extremely important considering the aspects of giving legitimacy for people to have immediate access. A robust access control system should be put in place to reduce excessive permeability through the design and to aid compartmentation this may include the use of access controlled lifts to control the movement of both residents and their visitors. It is recommended that data logged access control is installed at the earliest opportunity within the build to limit access of non-residents and those who have limited access rights. It is recommended that all lifts/doors leading out of the staircases onto the upper residential floors have data logged access control to help the Management Agency monitor usage of the different spaces and in turn help them to identify misusers in particular areas. This should work in tandem with CCTV to make it easier for the Managing Agency to deal with offences and via the tenancy agreements. This would be a requirement for the scheme to achieve SBD accreditation. **Defensible Space** – Across the design there is a proposal for ground level properties to activate the street frontage which is supported. However to protect these properties (as they are more vulnerable to crime and ASB), it is important to ensure that they are provided with low-level defensible zones around the property.	

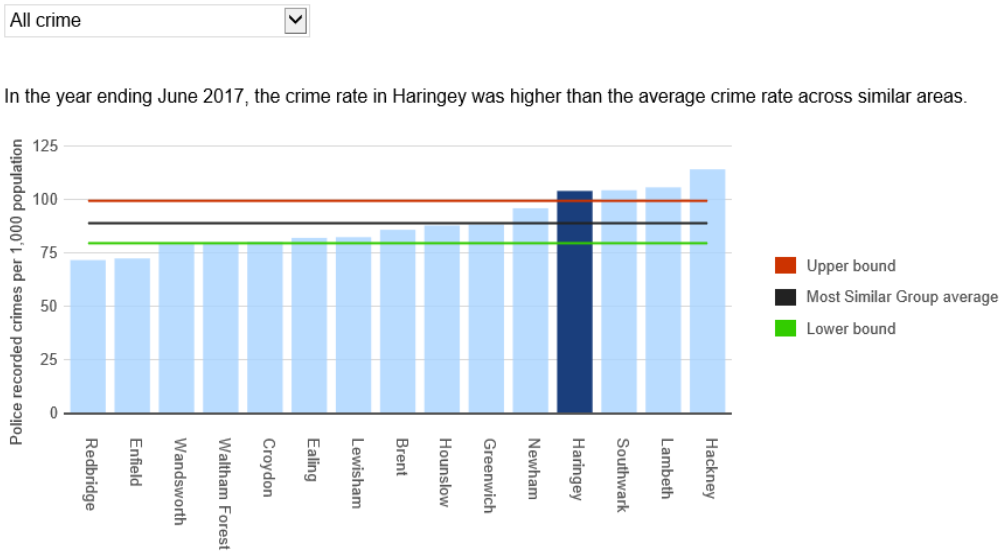
Stakeholder	Comment	Response
	Bin Storage – Bin storage is likely to be core specific and in close proximity to the building entrances for each of Waste Collection which is supported. It is strongly recommended that access to the bins are externally accessed by residents only and with the corridor removed to avoid creating a method of bypass into the residential aspects. In order to control these spaces as best as possible it is recommended that data logged SBD approved doorsets are used and are single sized large doors to eliminate the weaknesses of passive leaf manual locking systems. If double doors are required, then the passive leaf needs to be locked in such a way that Maintenance only can open the door. To help the Management Agency monitor the spaces and to help prevent against potential drug dealing, rough sleeping and assaults, CCTV should ideally be implemented both within and outside the stores. **Commercial/Residential mixed use –** It is strongly recommended that commercial and residential aspects of a build are always kept separate wherever possible and that there is no excessive permeability through each space. **Adjoining Balconies –** Adjoining balconies leave the residents more vulnerable to crime and ASB. Where possible it is recommended that balconies are suitably separated to ensure that climbing between them is not possible. Where this cannot be designed out it is advised that the doors and windows are to an enhanced standard to mitigate the risk. **Postal Strategy –** In order to prevent against postal theft, it is recommended that post be delivered into an airlock created through the Compartmentation requirements. These areas should be covered by CCTV that shows the post boxes for evidential purposes. A strategy for bulky package delivery and where this will be stored securely should also be reviewed against the number of residents who potentially may use this feature daily. **Appendix 2: Planning Policy** **London Plan 2021** **Policy D11: Safety, Security and Resilience to Emergency** This policy links design out crime, counter terrorism prevention measures and acknowledges fire safety issues. **Section B** of policy D11 Boroughs should work with their local Metropolitan Police Service 'Design Out Crime' officers and planning teams, whilst also working with other agencies such as the London Fire Commissioner, the City of London Police and the British Transport Police to identify the community safety needs, policies and sites required for their area to support provision of necessary infrastructure to maintain a safe and secure environment and reduce the fear of crime. Policies and any site allocations, where locally justified, should be set out in Development Plans. **Section C** of policy D11 These measures should be considered at the start of the design process to ensure they are inclusive and aesthetically inte	

Stakeholder	Comment	Response
	nto the development and the wider area. The policy considers not just crime, but also a wide range of hazards, such as fire, flood, extreme weather and terrorism. New buildings should therefore be **resilient** to all of these threats. **Paragraph 3.11.3** Measures to **design out crime**, including counter terrorism measures, should be integral to development proposal considered early in the design process, taking into account the principles contained in guidance such as the Secured by D Scheme published by the Police…. This will ensure development proposals provide adequate protection, do not compr good design, do not shift vulnerabilities elsewhere, and are cost-effective. Development proposals should incorporate mea that are proportionate to the threat of the risk of an attack and the likely consequences of one. **aragraph 3.11.4** he Metropolitan Police (Designing Out Crime Officers and Counter Terrorism Security Advisors) should be consulted to e ajor developments contain appropriate design solutions, which mitigate the potential level of risk whilst ensuring the qua aces is maximised. **aragraph 3.12.10** **re safety and security measures** should be considered in conjunction with one another, in particular to avoid potential co etween security measures and means of escape or access of the fire and rescue service. Early consultation between the L re Brigade and the Metropolitan Police Service can successfully resolve any such issues. **MM4 (Policy DM2) Part A(d)** "Have *regard to the principles set out in 'Secured by Design'"* **MM5: Para 2.14** - "Proposals will be assessed against the principles of secured by design'. The latest published uidance in this respect should be referred." **n Independent Sustainability report by AECOM on Tottenham area action plan states:** *"Crime is high in ottenham with many residents concerned about safety, gang activity and high crime rates. Issues are particularly ssociated with Northumberland Park and Tottenham Hale".* **2.3 of same report states:** • Crime rates are relatively high across the borough and crime is particularly prevalent in Northumberland Park. There is a need to design schemes in order to reduces levels of crime, fear of crime and anti-social behaviour. Since unemployment is strongly correlated with acquisitive crime, there may also be a link to wider economic development. • There are no references to crime in the **overarching policies**, although it is recognised that housing and economic polices aim to support a very significant level of regeneration in the area. This could indirectly lead to reduced crime / fear of crime in the medium term through creating more high quality environments and more	

Stakeholder	Comment	Response
	stable communities. **AAP 06** includes requirements on urban design and character and seeks to maximise opportunities to create legible neighbourhoods, which may assist in creating safe, modern and high quality places. • There are no references to crime in the **neighbourhood area sections;** however they do set out key objectives which include considerations for safe and accessible environments. Furthermore, as noted above, the scale of regeneration proposed should indirectly lead to reductions in crime and fear of crime. Crime is particularly high in Northumberland Park and Tottenham Hale, hence this issue might be explicitly addressed in these sections; however, it is recognised that the DM Policies DPD includes Borough wide requirements in this regard. Also, AAP 06 sets out the Council's commitment to preparing Design Code Supplementary Planning Documents (SPDs) for Tottenham's Growth Areas, where opportunities for secure by design principles can be investigated. • In **conclusion**, the plan is likely to result in positive effects on the crime baseline if there is large scale regeneration (including jobs growth) and robust implementation of safer streets and other measures to design out crime in Tottenham, including particularly in Northumberland Park where crime levels are highest. **Appendix 3 : Crime Figures** The crime figures provided below are publicly available on the Internet at http://www.met.police.uk/. The figures can at b considered as indicative as they do not include the wide variety of calls for police assistance which do not result in a report. Many of these calls involve incidents of anti-social behaviour and disorder both of which have a negative imp quality of life issues. Haringey is one of 32 London Boroughs policed by the Metropolitan Police Service. It currently has crime figures above av for the London Boroughs and suffers from high levels of crime and disorder to its residents and business communities. The following figures relate to recorded crime data from Police.uk for the below area:	

Stakeholder	Comment	Response
		

Stakeholder	Comment	Response
	 	

Stakeholder	Comment	Response
	Crime in Haringey compared with crime in other similar areas 	
Waltham Forest LB	No comment received	
Greater London Authority	See Appendix 4	
Greater London Archaeological Advisory Service	*Re-consultation received 03/02/2022: addendum to ES; and documents & plans relating to Plot A* The Greater London Archaeological Advisory Service (GLAAS) provides archaeological advice to boroughs in accordance with the National Planning Policy Framework and GLAAS Charter. NPPF section 16 and the London Plan (2021 Policy HC1) make the conservation of archaeological interest a material planning consideration. NPPF paragraph 194 says applicants should provide an archaeological assessment if their development could affect a heritage asset of archaeological interest. The planning application lies in an area of archaeological interest.	Suitable planning conditions are proposed to ensure the proposal does not have an adverse impact archaeological assets.

Stakeholder	Comment	Response
	The updated 2022 archaeology ES chapter better recognises the archaeological potential of the Roman road alignment through the site and the potential of the Moselle as well as the expected river crossing point, to preserve significant archaeological remains within the site boundaries. It does not go on to identify these assets as EIA receptors which is a strange decision, one which means that the presence of the heritage assets has still not effectively fed into mitigation and design decisions as the EIA process intends. The application continues to consider archaeological investigation to be a mitigation response. Archaeological investigation does not mitigate harm to receptors. It is a destructive process that has a negative impact on them. Further, the application proposes that archaeological work take place after demolition and remediation works on site, both of which have great scope to harm buried remains. Improved public understanding can be argued to be an offsetting of impact. The applicants have offered a modest suite of temporary outreach work during archaeological excavations but have not set out any ways that the archaeological heritage of the site might become an asset for the benefit of residents and victors through presentation and interpretation. It remains GLAAS' advice to you that a successful and policy-compliant scheme should take further account of identifying and sympathetically managing important archaeological heritage assets in order to harness them to create a characterful and maximally beneficial development that meets local and national policy objectives for both heritage and design. If the LPA chooses to grant the scheme in its current form, I recommend that the steps outlined above are carried out before detailed design matters are considered, in order to inform them. To this end, I recommend that the appended archaeological condition wordings be placed on any consent of the current application, should the LPA deem the material provided so far to be sufficient to base a decision on. I have looked at this proposal and at the Greater London Historic Environment Record. I advise that the development could cause harm to archaeological remains and field evaluation is needed to determine appropriate mitigation. However, although the NPPF envisages evaluation being undertaken prior to determination, in this case consideration of the nature of the development, the archaeological interest and/or practical constraints are such that I consider a two stage archaeological condition could provide an acceptable safeguard. This would comprise firstly, evaluation to clarify the nature and extent of surviving remains, followed, if necessary, by a full investigation. NPPF paragraphs 190 and 197 and London Plan Policy HC1 emphasise the positive contributions heritage assets can make to sustainable communities and places. Where appropriate, applicants should therefore also expect to identify enhancement opportunities. Without prejudice to our advice that the scheme should be determined and designed based on further archaeological assessment four (4) related conditions are listed below.	

Stakeholder	Comment	Response
	These would create a staged process of archaeological investigation, historic buildings recording (where appropriate), detailed development design work and then asset enhancement and public benefit. Recommend amendments and updates to archaeology submission **No reserved matters shall be submitted, nor shall any demolition or development take place in any phase** until a stage 1 written scheme of investigation (WSI) has been submitted to and approved by the local planning authority in writing, in consultation with GLAAS. For land that is included within the WSI, no reserved matters application shall be submitted or demoliton or groundworks begun other than in accordance with the agreed WSI , and the programme and methodology of a **site evaluation** and the nomination of a competent person(s) or organisation to undertake the agreed works. If heritage assets of archaeological interest are identified by stage 1, then for those parts of the site which have archaeological interest, a stage 2 **excavation and mitigation** WSI shall be submitted to and approved by the local planning authority in writing. For land that is included within the stage 2 WSI, no demolition/development shall take place other than in accordance with the agreed stage 2 WSI which shall include: A. The statement of significance and research objectives, the programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works B. Details of a programme for delivering archaeological outreach during the project. C. The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material. This part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the stage 2 WSI. Informative: *Written schemes of investigation will need to be prepared and implemented by a suitably Qualified professionally accredited archaeological practice in accordance with Historic England's Guidelines for Archaeological Projects in Greater London.* Condition 2 (Building recording) **No reserved matters shall be submitted, nor shall any demolition take place in any phase** until the applicant has secured the implementation of a programme of recording, research and historic analysis of the standing buildings in each phase, one which considers social history, building structure, architectural detail and archaeological evidence. This shall be undertaken in accordance with a written scheme of investigation for each phase, submitted by the applicant and approved by the local planning authority. *Informative: Locally listed buildings are present on the site. Accordingly, the planning authority wishes to secure the provision of historic building recording prior to development, in accordance with Historic England guidance.* Condition 3 (Foundation and below ground design): **No reserved matters shall be submitted nor shall any development in any phase shall take place,** other than archaeological work, within the proposed development site until the applicant has produced a detailed scheme	

Stakeholder	Comment	Response
	showing the complete scope and arrangement of the **foundation design and other below ground works** in each phase, which has been submitted to and approved by the local planning authority for each phase. *Informative The development of this site is likely to damage heritage assets of archaeological interest. The applicant should therefore submit detailed foundation and other below ground designs for approval that demonstrate reduced harm to buried remains.* Condition 4 (Presentation): **No reserved matters shall be submitted for any phase** until a scheme of **permanent heritage interpretation, landscaping and display** at the site has been agreed, in accordance with a research, materials, design and long-term maintenance proposal and the results of the recommended historic and archaeological research and investigation. The proposal for the work is to be approved in advance in writing by the Local Planning Authority in consultation with GLAAS. The scheme shall be displayed in the public realm of the site and should be integrated uniformly with the site's other public realm, design and landscape proposals. *Informative: The LPA wishes that the rich history of the site and its surroundings be conveyed to the public. These include the heritage of Ermine Street Roman road, the Moselle, any river crossing by the Roman road, and any other significant remains encountered during fieldwork. The interpretation scheme should be researched, designed and implemented by a recognised historical or archaeological interpretation specialist with appropriate experience of the periods involved.* Thank you for your consultation received on 18 November 2021. The Greater London Archaeological Advisory Service (GLAAS) give advice on archaeology and planning. Our advice follows the National Planning Policy Framework (NPPF) and the GLAAS Charter. NPPF Section 16 and the London Plan (2021 Policy HC1) make the conservation of archaeological interest a material planning consideration. NPPF section 194 says applicants should provide an archaeological assessment if their development could affect a heritage asset of archaeological interest. A field evaluation may also be necessary. I have looked at this proposal and at the Greater London Historic Environment Record but I need more information before I can advise you on the effects on archaeological interest and their implications for the planning decision. If you do not receive more archaeological information before you take a planning decision, I recommend that you include the applicant's failure to submit that as a reason for refusal. The submitted study has focused on post-mediaeval remains and had not unfortunately carried out the geoarchaeological modelling work recommended in the scoping response or consulted the Corcoran et al Lower Lea Valley Model towards establishing the potential for earlier periods. Questions about harm and significance are not well	

Stakeholder	Comment	Response
	explored in the submission. It is regrettable that the DBA authors did not consult GLAAS for advice on relevant sources. Of greater concern, the EIA considers archaeological investigation to be a mitigation response, indeed the only mitigation response. Further, it proposes this work take place after demolition and remediation works on site, both of which have great scope to harm buried remains. Archaeological investigation does not mitigate harm to receptors. It is a destructive process that has a negative impact on them. Improved public understanding can be argued to be an offsetting of impact, but the applicants have not considered how they might create public understanding or other heritage benefits in their submission. No proposals are put forward to avoid harm through design or programming of development and no proposals are put forward for public heritage benefits that could offset harm and which would assist in creating a sense of place and celebration of local history and character in a final scheme. This was a key recommendation at scoping and has also not been acknowledged. The proposals do not comply with London Plan or Local Plan policies about heritage display and interpretation and are also not underpinned by thorough assessment. I recommend that the heritage submissions be updated and that the applicants liaise with GLAAS during this process. If the applicants are not able to do this, then I recommend that this advice forms part of a formal Reg 25 request. Because of this, I advise the applicant completes these studies to inform the application: Desk Based Assessment and ES Chapter revisions Desk-based assessment produces a report to inform planning decisions. It uses existing information to identify the likely effects of the development on the significance of heritage assets, including considering the potential for new discoveries and effects on the setting of nearby assets. An assessment may lead on to further evaluation and/or mitigation measures. The DBA and the relevant ES Chapter should be updated in line with the recommendations above. I will need to agree the work beforehand and it should be carried out by an archaeological practice appointed by the applicant. The report on the work must set out the significance of the site and the impact of the proposed development. I will read the report and then advise you on the planning application. NPPF paragraphs 199 - 202 place great weight on conserving designated heritage assets, including non-designated heritage assets with an archaeological interest equivalent to scheduled monuments. Non- designated heritage assets may also merit conservation depending upon their significance and the harm caused (NPPF paragraph 203). Conservation can mean design changes to preserve remains where they are.	

Stakeholder	Comment	Response
	NPPF paragraphs 190 and 197 and London Plan Policy HC1 emphasise the positive contributions heritage assets can make to sustainable communities and places. Applicants should therefore expect to identify appropriate enhancement opportunities. If preservation is not achievable then if you grant planning consent, paragraph 205 of the NPPF says that applicants should record the significance of any heritage assets that the development harms. You can find more information on archaeology and planning in Greater London on our website. This response only relates to archaeology. You should also consult Historic England's Development Management team on statutory matters.	

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GREATER**LONDON**AUTHORITY

Planning report GLA/2021/1215/S1/01

7 February 2022

High Road West, Tottenham

Local Planning Authority: Haringey

Local Planning Authority reference: HGY/2021/3175

Strategic planning application stage 1 referral

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008.

The proposal

Comprehensive phased mixed use redevelopment of the site, including the regeneration of the Love Lane Estate and the provision of up to 2,929 homes, together with commercial, community, employment and industrial uses, a new public park and civic square, with buildings ranging in height from 4 to 29-storeys.

The applicant

The applicant is **Lendlease** and the architect is **Studio Egret West and PTE**

Strategic issues summary

Estate regeneration: The scheme would ensure the like for like replacement of existing affordable housing and the right to return for all social rent households. The approach to leaseholders and public consultation complies with the Mayor's key principles on estate regeneration. Therefore, the comprehensive redevelopment of the estate can be supported (paragraph 20 to 29).

Land use principles: The comprehensive residential-led mixed use redevelopment of the site accords with the expectations set out in the Local Plan site allocation and is supported in strategic planning terms, subject to further discussion and clarification regarding the provision of employment and social infrastructure use and means of securing this (paragraph 30 to 46).

Housing and affordable housing: The applicant's Financial Viability Assessment (FVA) is being scrutinised to ensure the scheme is providing the maximum viable level of affordable housing. Early, mid and late stage viability review mechanisms will be required. Affordability levels on intermediate housing should be secured (paragraph 47 to 60).

Urban design: The design and layout is strongly supported and is aligned with the High Road West Masterplan Framework. The density is supported, noting the design-led approach undertaken. The residential quality is acceptable (paragraph 61 to 95).

Tall buildings: The height and massing proposed can be supported in this plan-led location and the scheme would overall comply with the qualitative criteria set out in London Plan Policy D9 in respect of visual, heritage, functional, environmental and cumulative impacts. The architectural and materials quality of tall buildings should be of an exemplary standard (paragraph 73 to 83).

Heritage: The harm to heritage assets would be less than substantial. This would be clearly and convincingly outweighed by the public benefits proposed by the application (paragraph 94 to 101).

Transport: Updated bus trip generation figures should be provided to enable officers to fully assess the impact on bus capacity and clarify whether any mitigation is required. Conditions should secure further details regarding car parking, cycle parking and Road Safety Audits (paragraph 102 to 116).

Climate change and urban greening: The approach to energy, drainage and urban greening is generally acceptable, subject to conditions and obligations (paragraph 117 to 135).

Recommendation

That Haringey Council be advised that, whilst the scheme is broadly supported in strategic planning terms, the application does not yet fully comply with the London Plan for the reasons set out in paragraph 139. However, the possible remedies set out in this report could address these deficiencies.

Context

1. On 30 November 2021 the Mayor of London received documents from Haringey Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008, the Mayor must provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2. The application is referable under the following categories of the Schedule to the Order 2008:

   - Category 1A: "Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats."

   - Category 1B(c): "Development (other than development which only comprises the provision of houses, flats, or houses and flats) which comprises or includes the erection of a building or buildings - outside Central London and with a total floorspace of more than 15,000 square metres."

   - Category 1C: "Development which comprises or includes the erection of a building of…more than 30 metres high and is outside the City of London."

   - Category 3A: "Development which is likely to— (a) result in the loss of more than 200 houses, flats, or houses and flats."

3. Once Haringey Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or, allow the Council to determine it itself.

4. The environmental information for the purposes of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 has been taken into account in the consideration of this case.

5. The Mayor of London's statement on this case will be made available on the GLA's public register: https://planning.london.gov.uk/pr/s/

Site description

6. The High Road West comprises an 8.57-hectare site in Tottenham which falls within the Lee Valley Opportunity Area and Northumberland Park Growth Area. The site is allocated for comprehensive, masterplanned residential-led mixed use redevelopment in the Tottenham Area Action Plan (NT5). The proposals cover a large and complex urban site covering a number of urban blocks and development parcels in different land ownership and use. This is shown in Figure 1 and the key elements summarised below.

Figure 1 – site location and surrounding context



- Southern site (shaded yellow) – This includes the Council owned Love Lane Housing Estate and Coombes Croft Library. This part of the site also includes high street properties at 731 to 759 High Road, which are not statutory listed and are understood to be in multiple ownership. The Love Lane Estate comprises residential buildings of between 4 and 10-storeys, including flats, stacked maisonettes and three 10-storey towers (Charles House, Moselle House and Ermine House), as well as areas of surface car parking, garages, open space, including some relatively mature trees.

- 100 Whitehall Street (shaded purple) – This part of the site is located on the other side of the railway line and comprises the three-storey Whitehall Lodge in residential use (social rent) and single storey community centre building (the Whitehall & Tenterden Community Hall);

- Northern site (shaded in blue) – This includes a number of commercial owned brownfield sites as well as properties along White Hart Lane. This part of the site comprises:

    - The former Goods Yard site - which is now cleared land which was temporarily used as a construction compound for the Tottenham Hotspur Stadium development and is now in temporary use for stadium car parking;

    - Carberry Enterprise Park and Peacock Industrial Estate - which comprises a mix of one and two-storey light industrial units (non-designated industrial land) with ancillary office and car parking;

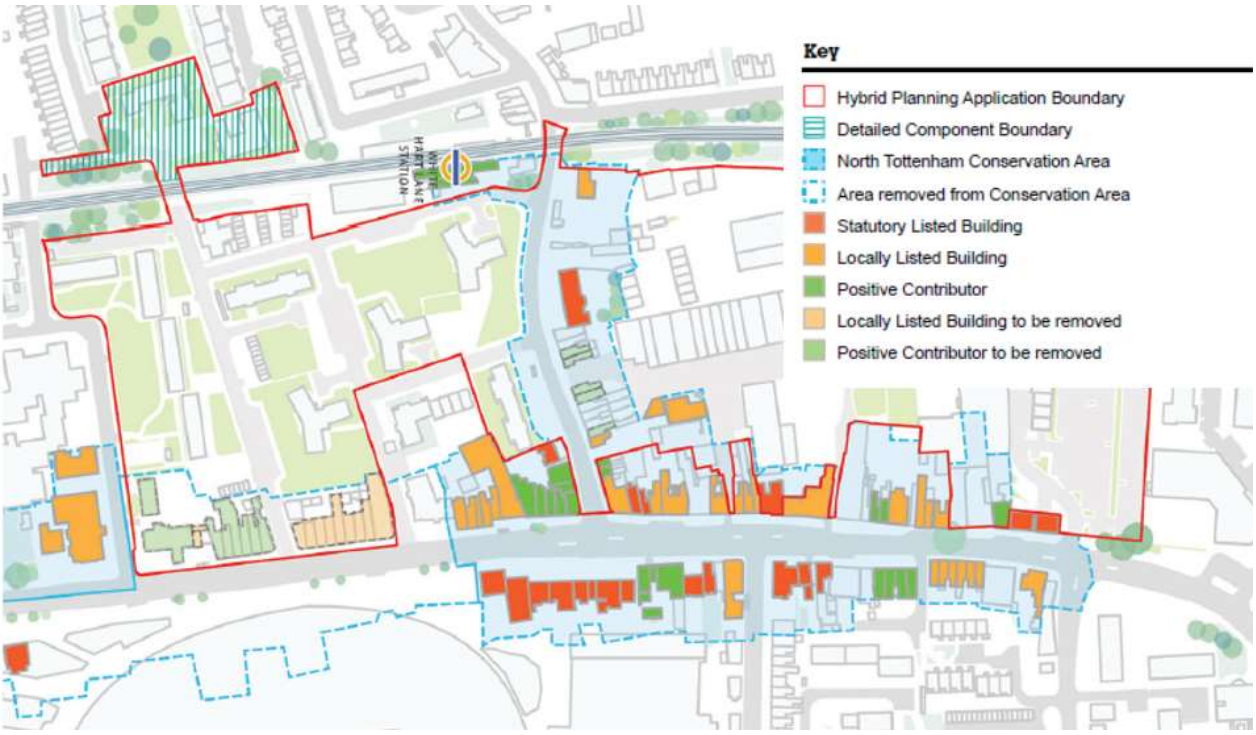
    - Light industrial buildings and yards to the rear of the High Road which are in a mix of community/ church, banqueting and timber yard uses, together

with three public alleyway routes (Chapel Place, Brunswick Square and Percival Court);

- The Depot - which comprises a large footprint two-storey retail building which is occupied by B&M Stores (previously Sainsbury's) and a large surface car park, as well as five small retail units to the south;
- Numbers 8 to 16 and 24 to 30 White Hart Lane which are unlisted two-storey high street properties;
- The Grade II listed the Grange (34 White Hart Lane); and
- 52 White Hart Lane which is locally listed.

7. The site includes the Grade II listed 819 and 821 High Road and the Grade II listed the Grange (34 White Hart Lane). Parts of the site along the High Road and White Hart Lane fall within the North Tottenham Conservation Area, as updated in the Haringey Local Plan Proposals Map (2017). There are also a number of listed buildings which are immediately adjacent to the site, as shown below. This includes the Grade II listed 7 White Hart Lane; the Grade II listed 797 and 799 High Road and 867 and 869 High Road. On the opposite (eastern) side of the High Road is the Grade II* listed Dial House, Percy House and 808-810 High Road, together with the Grade II listed Nos. 792-794, 798-802 and 816-822 High Road.

Figure 2 – heritage context



8. The Public Transport Access Level (PTAL) varies across the site ranging from PTAL 5 to 3 on a scale of 0 to 6b, where 6b represents the highest connectivity to the public transport network as a whole. White Hart Lane station (London Overground and Greater Anglia services) is located immediately adjacent to the site. Bus routes in vicinity of the site include five daytime bus routes with bus stops along the A1010

High Road, White Hart Lane and Northumberland Park. In terms of the wider context, Northumberland Park station (National Rail services) and Seven Sisters station (London Underground Victoria Line and London Overground) are approximately 1 kilometre to the east and 3 kilometres south of the site respectively.

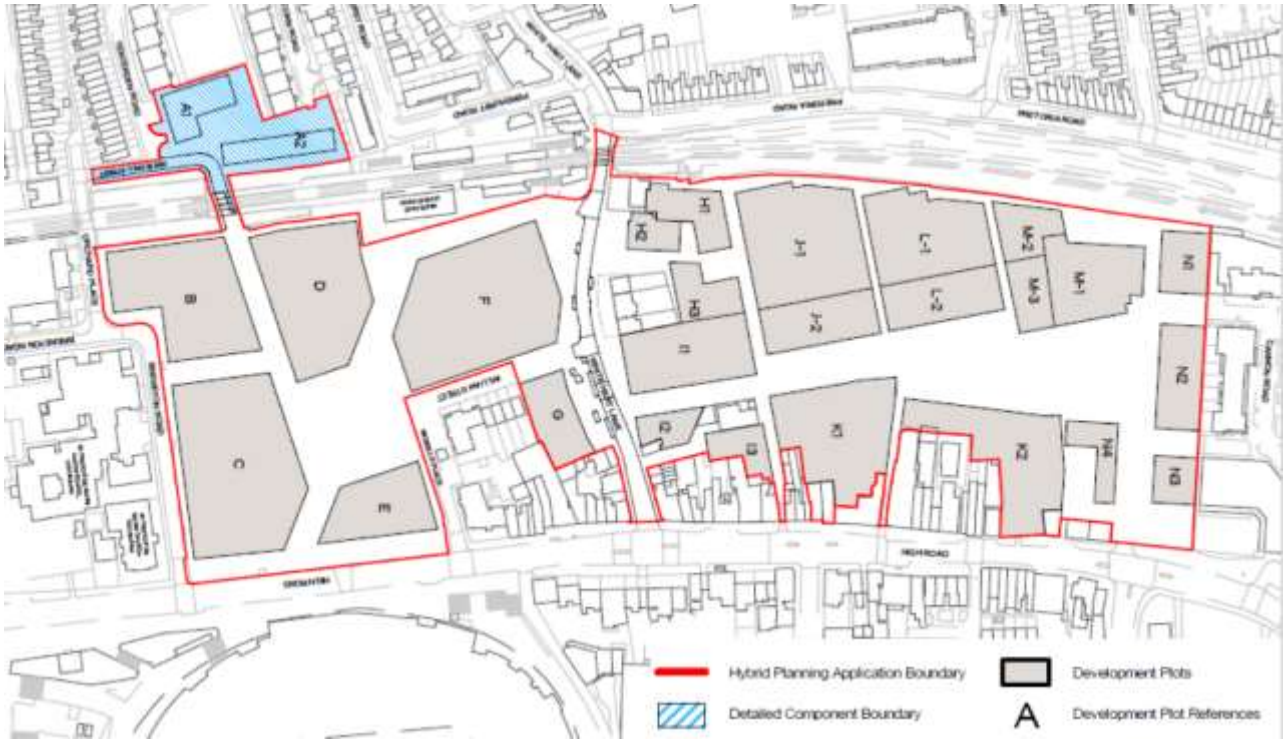
9. Cycleway 1 (From Tottenham to Liverpool Street) is located approximately 400 metres south of the development site. The A1010 High Road forms part of the Strategic Road Network (SRN) and is adjacent to the site. The nearest points of vehicular access to the Transport for London Road Network (TLRN) is the A10 Bruce Grove / A1010 High Road junction and the A406 North Circular Road / A1010 Fore Street junction, located approximately 1 kilometre to the south and north respectively.

Details of this proposal

10. The applicant seeks hybrid planning permission (part detailed; part outline) for the demolition and comprehensive phased mixed use redevelopment of the site, including the regeneration of the Love Lane Estate and the provision of up to 2,929 homes, together with commercial, community, employment and industrial uses, a new public park and civic square, with buildings ranging in height from 4 to 29-storeys.

11. The detailed element comprises the first phase of the scheme (Plot A – Whitehall Mews). This would comprise two residential blocks ranging in height from 5 and 6-storeys providing 60 homes, with associated landscape, public realm and access improvements. The outline component comprises the demolition of existing buildings and creation of new mixed-use development including residential (Use Class C3), commercial, business & service (Use Class E), leisure (Use Class E), community uses (Use Class F1/F2), and Sui Generis uses together with the creation of a new public square, park & associated access, parking, and public realm works. The detailed and outline elements are shown below.

Figure 3 – Detailed and outline Development zones



12. Matters relating to layout, scale, appearance, landscaping, and access within the site reserved for subsequent approval. The outline element of the scheme is guided by a development specification document setting out minimum and maximum floorspace areas for the proposed development by land use and within each development zone. The outline element would also be guided by parameter plans and a design code, as well as an illustrative masterplan.

Case history

13. GLA pre-application meetings with the applicant took place on 20 July 2021, 5 October 2021 and 17 November 2021. The GLA's pre-application advice note was issued on 1 November 2021 and provided the following strategic planning advice.

- The estate regeneration proposal is expected to ensure the like for like replacement of existing affordable housing floorspace and the right to return for all residents. The approach to leaseholders and public consultation would also accord with the principles set out in the Mayor's Good Practice Guide to Estate Regeneration.

- The comprehensive, masterplanned residential-led mixed use redevelopment of the site accords with the expectations set out in the Local Plan site allocation and is supported in strategic planning terms, subject to further details being provided relating to town centre impact and clarification on the quantum of town centre, employment and social infrastructure use and means of securing this, including low cost workspace provision.

- The application will need to follow the Viability Tested Route. A Financial Viability Assessment (FVA) should be submitted which will be scrutinised by GLA officers to ensure the scheme is providing the maximum viable level of affordable housing. Early, mid and late stage viability review mechanisms will be required. Further discussion is required to confirm the affordability of the intermediate housing.

- The design and layout is supported and is aligned with the High Road West Masterplan Framework. The density is supported, noting the design-led approach undertaken.

- The height and massing proposed which includes tall buildings could be supported in this location, subject to the scheme complying with the qualitative criteria set out in London Plan Policy D9 in respect of visual, heritage, functional, environmental and cumulative impacts. The architectural and materials quality of tall buildings should be of an exemplary standard.

- Harm to heritage assets would be caused through the demolition of non-designated heritage assets and impacts on the setting and significance of other designated heritage assets. This will need to be justified when balanced against the public benefits associated with the scheme.

- A range of matters relating to transport, energy, drainage, play space, urban greening, circular economy and whole life carbon cycle should be addressed in the planning application.

Tottenham Hotspur Football Club planning applications and permissions

14. Two separate extant planning permissions are in place on the northern site which are summarised below and were secured by a different applicant (Tottenham Hotspur Football Club) which is the landowner of this part of the site:

    - The Goods Yard site is subject to a hybrid planning permission (part detailed / part outline) which was granted at appeal in June 2019 (LPA ref: HGY/2018/0187). This permission comprised up to 316 homes, employment, retail, leisure and community uses with two residential towers of 18 and 22-storeys with building heights stepping up in height from south to north and maximum heights ranging from 3 to 8-storeys on the remaining blocks. The appeal was lodged under grounds of non-determination.

    - The Depot is subject to hybrid planning permission (LPA ref: HGY/2019/2929) for up to 330 homes, with retail and cafe use and the northern section of the new public open space. This consent included a 29-storey tower to the west, with a part 7 and part 9-storey building to the north and building heights ranging from 6 to 3-storeys on the remainder of the site, stepping down towards the High Road.

15. A full planning application was submitted by Tottenham Hotspur FC for the Goodsyard and Depot sites in June 2021 (LPA ref: HGY/2021/1771) This proposes residential-led mixed use redevelopment of the site comprising 867 homes (36% affordable housing by habitable room), 1,878 sq.m. of flexible commercial, business, community, retail and service use (in Class E use), together with public open space, landscaping, parking, with building heights ranging from 6 to 32-storeys.

16. The Mayor's Stage 1 report was issued on 23 August 2021 (GLA ref: 0718). On 8 November 2021 Haringey Council Planning Committee resolved to refuse planning permission for the application. This was against the advice of Haringey Council planning officers who recommended that the Planning Committee should grant planning permission. The application was referred to the Mayor at Stage 2 and on 20 December 2021, the Mayor's Stage 2 decision was issued which advised Haringey Council that the Mayor was content for the Council to determine the case. GLA officers understand that an appeal has been submitted by the applicant in relation to this application.

Strategic planning issues and relevant policies and guidance

17. For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the Development Plan in force for the area comprises the Haringey Strategic Policies DPD (2017); the Haringey Development Management DPD (2017); the Tottenham Area Action Plan (2017); and, the London Plan 2021.

18. The following are also relevant material considerations:

    - The National Planning Policy Framework and National Planning Practice Guidance;
    - The National Design Guide;
    - The National Model Design Code;
    - The Upper Lee Valley Opportunity Area Planning Framework (OAPF) (2013);

- Haringey Council - High Road West Masterplan (2014);
- Haringey Council – High Road West Masterplan (2021); and
- Haringey Council – North Tottenham Conservation Area Appraisal & Management Plan (2017).

19. The relevant issues, corresponding strategic policies and guidance (supplementary planning guidance (SPG) and London Plan guidance (LPG), are as follows:

• Estate regeneration	*London Plan; Affordable Housing & Viability SPG; Housing SPG; The Mayor's Good Practice Guide to Estate Regeneration;*
• Land use principles	*London Plan; Social infrastructure SPG;*
• Housing, affordable housing and play space	*London Plan; Affordable Housing & Viability SPG; Housing SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG; the London Housing Strategy; Good Quality Homes for All Londoners draft LPG;*
• Urban design and heritage	*London Plan; Shaping Neighbourhoods: Character and Context SPG; Housing SPG; Public London Charter LPG; Good Quality Homes for All Londoners draft LPG; Fire Safety D12(A) pre-consultation draft LPG; Fire Statements D12(B) pre-consultation draft LPG; Fire Evacuation Lifts D5(B5) pre-consultation draft LPG;*
• Inclusive access and equalities	*London Plan; Planning for Equality and Diversity in London SPG Accessible London: Achieving an Inclusive Environment SPG;*
• Climate change and sustainable development	*London Plan; the London Environment Strategy; The control of dust and emissions in construction SPG; Circular Economy Statements draft LPG; Whole-life Carbon Assessments draft LPG; 'Be Seen' Energy Monitoring LPG; Urban Greening Factor pre-consultation draft LPG; Air Quality Neutral draft LPG; Air Quality Positive LPG;*
• Transport	*London Plan; the Mayor's Transport Strategy; Sustainable Transport, Walking and Cycling draft LPG.*

Principle of estate regeneration

20. London Plan Policy H8 resists the demolition of affordable housing unless it is replaced by an equivalent amount of affordable housing floorspace, and affordable housing floorspace is reprovided on a like for like basis and integrated into the development to ensure mixed and inclusive communities. As set out in the London Plan, all estate regeneration schemes should take into account and reflect the following key principles set out in the Mayor's Good Practice Guide to Estate Regeneration (GPGER) which apply to all estate regeneration schemes in London:

- like for like replacement of existing affordable housing floorspace
- an increase in affordable housing
- full rights of return for any social housing tenants
- fair deal for leaseholders/freeholders
- full and transparent consultation and involvement

Existing residential homes within the estate

21. The applicant has provided figures confirming the existing homes to be demolished as part of the proposed redevelopment. This includes 297 residential homes, comprising 40 social rent tenure homes, 211 affordable rent tenure homes (temporary accommodation), 22 private owned homes (including right to buy leaseholders), together with a further 24 non-resident leaseholders. The existing housing by tenure and unit size is set out below.

Table 2 – Existing homes proposed for demolition and redevelopment

	Social rent	**Non-secure affordable rent (temporary accommodation)**	**Private leasehold (resident)**	**Non-resident leasehold**	**Total**
1-bedroom	27	92	1	4	124
2-bedroom	7	46	5	3	61
3-bedroom	6	72	14	17	109
4-bedroom	0	1	1	0	2
5-bedroom	0	0	1	0	1
Total	**40**	**211**	**22**	**24**	**297**

Like for like replacement

22. The applicant is proposing 500 social rent tenure units. This would increase the overall provision of low cost rent accommodation (both social rent homes and temporary accommodation) on the site by approximately +250 homes. This is strongly supported. Given that all LAR units would be replaced with secure social rent homes, the application would also provide a net increase of +460 secure social rent tenure homes. This is strongly supported. The proposed social rent provision within the illustrative scheme mix is set out below, showing the proposed net increase in units.

23. Based on these dwelling figures, it is evident that there would be an increase in social rented accommodation by floorspace and habitable room, in accordance with London Plan Policy H8, which also appeared to be the case based on the information

submitted at pre-application stage. However, the applicant should provide further information to clarify the quantum of existing and proposed affordable housing within the estate by floorspace, noting that floorspace is the key metric for assessing reprovision as set out in London Plan Policy H8. Habitable room figures should also be provided to enable a full comparison.

Table 3 – Net change in social rented tenure

	Total existing social rent and affordable rent	**Proposed social rent**	**Net change**
1-bedroom	119	55	-64
2-bedroom	53	225	+172
3-bedroom	78	165	+87
4-bedroom	1	55	+54
5-bedroom	0	0	0
Total	**251**	**500**	**+249**

Right to return

24. In terms of the right to return, the applicant's Landlord Offer on which the recent ballot was based confirmed that the right to return to the redeveloped High Road West neighbourhood would be offered to the 40 households on social rent tenancies and 211 households in non-secure temporary accommodation. To benefit from a right to return, households need to have lived on the estate since January 2021. This exceeds the minimum requirement set out in London Plan Policy H8 and the Mayor's GPGER and is strongly supported. The phasing approach seeks to ensure residents only need to move once through a 'single move' approach where possible, which is welcomed.

Fair deal for leaseholders

25. The Mayor's GPGER seeks to ensure that leaseholders affected by estate regeneration are treated fairly and fully compensated. The Landlord Offer sets out the applicant's commitment to ensure fair compensation for resident leaseholders (market value, with an additional 10% compensation, plus all reasonable legal and moving costs paid). Resident leaseholders would also be offered an affordable home within the redeveloped neighbourhood via the offer of financial support in the form of an equity loan / shared equity homes. This approach is acceptable and accords with the key principles set out in the Mayor's GPGER.

Full and transparent consultation

26. The applicant has undertaken a ballot recently which was undertaken by an independent body, in line with the GPGER and GLA funding guidelines. Residents voted 56% "yes" in favour of the regeneration proposals, with a turnout rate of 69% of the eligible residents. This is welcomed and accords with the Mayor's Good Practice Guide to Estate Regeneration (GPGER). The Local Plan site allocation sets out a number of requirements relating to the engagement with existing residents through the establishment of a Residents Steering Group and discussion and feedback with

this group in formulating the masterplan and in formulating phasing and decant options.

27. In its Statement of Community Involvement, the applicant has set out how it has addressed these engagement requirements leading up to the landlord offer, ballot and next steps. The applicant has established a Residents Charter and Design Guide in formulating the masterplan and detailed phase 1 element. This approach is expected to be used for all further estate regeneration phases. This consultation process has been underway for a number of years, leading up to the ballot. Overall, the approach accords with the key principles set out in the GPGER in terms of early engagement and feedback.

Consideration of alternatives

28. London Plan Policy H8 states that before considering demolition of existing estates, alternative options should be considered and the potential benefits associated with the option to demolish and rebuild an estate set against the wider social and environmental impacts. In this case, there is a detailed plan-led approach in place which sets out the rationale for the comprehensive redevelopment of the estate and establishes the principle of demolition and redevelopment in order to optimise the regeneration and potential of the site. This is set out in the High Road West Masterplan (2014) and Tottenham Area Action Plan (2017).

Conclusion – estate regeneration

29. The estate regeneration proposal would ensure the like for like replacement of existing affordable housing floorspace and the right to return for all residents. The approach to leaseholders and public consultation would also accord with the principles set out in the Mayor's Good Practice Guide to Estate Regeneration. Therefore, the comprehensive redevelopment of the estate is supported in this case, subject to the maximum viable level of affordable housing provision being secured. Clarification of the existing affordable housing floorspace should be provided.

Land use principles

Housing supply

30. London Plan Policy H1 sets a London wide 10-year housing target for 522,870 net additional homes to be completed by 2029, with Haringey set a 10-year target of 15,920 new homes during this period. Based on the maximum number of gross new homes proposed (2,929 homes), the proposals would comprise 2,632 net additional homes. This would therefore make substantial contribution towards meeting local and strategic housing targets, which is strongly supported.

Town centre use

31. The site currently adjoins the Tottenham High Road North Local Shopping Centre. The Council's site allocation in the Area Action Plan (2017) sets an ambitious vision for the comprehensive regeneration site. This seeks to create a new vibrant mixed use neighbourhood, centred around the new Moselle public square. This new / expanded local centre would comprise a mix of commercial, leisure, indoor sport,

community and cultural uses whilst ensuring this additional floorspace complements nearby centres.

32. The applicant's proposals respond positively to this plan-led vision. The overall quantum of town centre use proposed in the illustrative scheme appears to be slightly over the expectations set in the AAP. However, this can be justified in this case, taking into account the specific circumstances of the development and noting the comprehensive nature and scale of the scheme, alongside the existing and emerging context.

33. The existing site contains circa 9,000 sq.m. of traditional large footprint retail floorspace on the B&M site. The application proposes up to 7,800 sq.m. of flexible Class E (a-c) floorspace. Rather than seek to replace the existing large footprint store, the proposals seek to redistribute the retail floorspace across the site through a range of smaller retail units targeted at independent and local businesses. This is supported and would help to activate the proposed new public realm and supports the strong place making approach in relation to Moselle Square and other key public spaces.

34. The scale of commercial floorspace is considered commensurate with the overall increase in residential density across the site and the overall objectives in the Council's site allocation. An additional site specific in this case is the likely footfall associated with stadium events. The proposals are supported by a retail impact assessment and the overall conclusions of this assessment are considered acceptable in strategic planning terms in terms of the potential impact on nearby town centres. As such, the application is considered to comply with London Plan Policies SD6, SD7 and SD8.

Employment and industrial use

35. The applicant has confirmed that currently there is approximately 11,750 sq.m. of existing industrial floorspace on site, alongside 1,790 sq.m. of office, R&D and light industrial uses. The location and quantum of the existing industrial, retail and community use is set out below.

36. The site allocation seeks the replacement of existing employment uses, including high quality workspace. The illustrative masterplan envisages a series of light industrial / workspaces being accommodated on the northern site to the rear of the existing High Road buildings within the 'Peacock and Roebuck Yards' character area. This seeks to ensure provision for a variety of light industrial and creative SMEs, co-located alongside other residential and commercial uses. Further workspace use could also be provided on the southern site. This overarching land use approach is set out in the proposed parameter plans and development specification. Plot E would be restricted to community uses, with some active commercial potentially at ground floor. This overall approach is supported.

37. The Carberry Enterprise Park and Peacock Industrial Estate comprise non-designated industrial land in active employment use, including existing light industrial occupiers, including a large number of small businesses providing a diverse range of local services including food production, manufacturing, car mechanics and furnishing production workshops. Historically, this land was previously designated as Locally Designated Industrial Site (LSIS) but was de-designated as part of the

Tottenham AAP and Haringey Local Plan (2017). The principle of the redevelopment of these industrial sites is therefore established in the Council's site allocation. As such, the proposals would not conflict with the criteria set in Part C of London Plan Policy E7.

Land Use	Existing GIA[1] (sqm)	Existing GEA (sqm)
B2: Industrial	9,818	10,800
B8: Industrial	864	950
Use Class B Total:	**10,682**	**11,750**
C3: Residential	31,109	34,220
C2: Institutional Accommodation	879	967
Total:	**31,998**	**35,187**
E(a): Retail other than hot food	8,236	9,060
E(b): Sale of food and drink mainly for consumption on premise	3,759	4,125
E(e): Medical or healthcare	818	900
E(g): Offices for operational or administrative functions / R&D of products or processes / Industrial processes	1,627	1,790
Use Class E Total:	**14,440**	**15,885**
F1(d): Public Library or reading rooms	455	500
F1(f): Public places of worship	595	655
F2(b): Local community halls	1,023	1,125
Use Class F Total:	**2,073**	**2,280**
Sui Generis: Public House	1,086	1,195
Sui Generis: Sub Station	86	95
Sui Generis Total:	**1,172**	**1,290**
Grand Total:	**60,355**	**66,392**

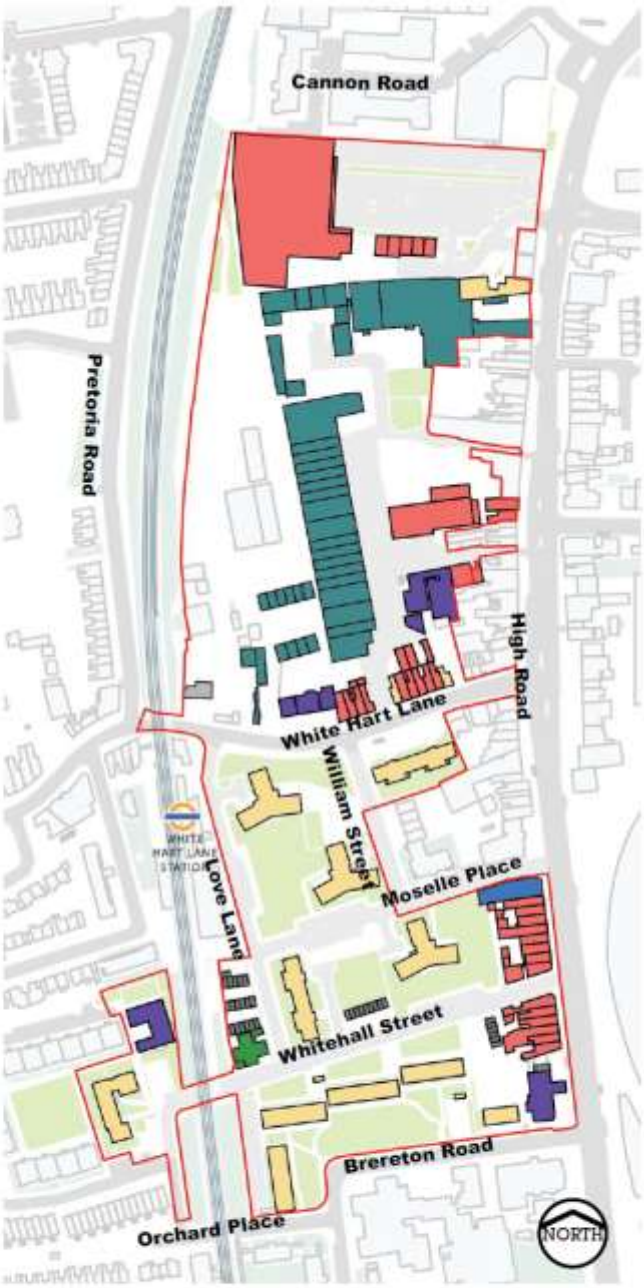


Fig.40 - Existing Land Use Plan

HRW Hybrid Planning Application Boundary
Residential
Retail, leisure, cafes and restaurants
Retail: Medical or Healthcare
Industrial uses
Community uses
Sui Generis: Public House
Ancillary Uses: Substation and Garages
Disused (Station Master's House)

38. London Plan Policy E2 seeks to ensure the reprovision of low cost business workspace in particular defined circumstances, for example, where it is identified locally that there is a shortage of low-cost workspace of particular types, uses or

sizes. Further discussion with the Council and applicant is required to confirm whether this is the case in this instance and the approach that should be taken to secure provision of low cost workspace.

39. The proposed land use parameters would ensure that there is flexibility to provide up to a maximum of 8,000 sq.m. of industrial use, together with a further 7,200 sq.m. of office, R&D and light industrial use (15,200 sq.m. in total) in Class E(g) use. This is supported in principle and would exceed the existing quantum of employment floorspace provision on the site. The applicant has stated that the land use and design parameters proposed would allow some of the existing businesses within the site to relocate within the proposed development. Further details of this aspect of the scheme will be considered at Stage 2.

40. However, it is noted that the minimum floorspace requirements are set at 0 sq.m. for industrial and 1,525 sq.m. for office and light industrial. This is unlikely to be agreed as an acceptable minimum level of provision. Separately, a footnote in the development specification states that a minimum of 4,686 sq.m. GEA of Class B2/ B8 industrial and/or office, R&D and light industrial use (Class Eg).

41. As such, further discussion is required to confirm that this is an acceptable minimum quantum for the site. Further discussion is required to determine the minimum quantum of employment and low-cost workspace which should be secured, in accordance with London Plan Policy E2. A commercial relocation strategy should be secured and provision of affordable and low cost workspace. Given the landownership issues and the position of existing leaseholders on some parts of the site, the applicant and local planning authority should also consider how flexible and responsive the masterplan and phasing programme are to potential land ownership issues over time should it not be possible to assemble the entire site.

Social infrastructure

42. London Plan Policy S1 supports the provision of high quality social infrastructure and seeks to ensure that existing social infrastructure is reprovided as part of proposed redevelopment. The site currently includes the Coombes Croft Library (500 sq.m) and there is understood to be other smaller scale community and faith uses to the rear of the High Road (655 sq.m.). However, clarification on this issue should be provided.

43. A community hub is proposed in Plot E which would comprise a four-storey pavilion / marker building in community use enclosing Moselle Square and fronting the High Road. This is expected to allow for the phased reprovision of the existing library to provide a new library and learning centre with significantly enhanced community facilities early on in the development. It is understood that this would also ensure continuity of provision. However, this should be secured by condition / obligation. Additional community uses would be provided fronting the proposed Peacock Park on the northern site and through the sensitive re-use of the Grade II listed the Grange and locally listed Station Masters House. This is supported.

44. Based on the land use parameters proposed, there would be a minimum requirement for 1,000 sq.m. of community and indoor sport and recreation floorspace, including a minimum of 500 sq.m. library use and minimum 500 sq.m. community hall. This exceeds the current quantum of provision. There would also be scope to provide up to a maximum of 6,000 sq.m. of community and other Class F uses. As such, the

application generally complies with London Plan Policy S1, subject to the wording of the proposed phasing conditions and obligations being reviewed at Stage 2.

Open space

45. Currently, the Love Lane Estate includes an undesignated open space in the form of communal lawns which are mostly fenced off spaces adjacent to blocks, including a number of relatively mature trees. Many of these spaces lack a clear sense of ownership but do provide amenity and urban greening value. The site allocation sets out the Council's objective for the redevelopment of the site to result in a net increase in the quantity of open space and an improvement in its overall quality.

46. The illustrative masterplan proposes approximately 42,100 sq.m. of publicly accessible open space, including a new civic square at Moselle Square and a new urban park (Peacock Park). A minimum of 33,000 sq.m. of publicly accessible open space would be secured in the development specification document, of which, 5,300 sq.m. would comprise the new public park and 3,500 sq.m. would comprise the new public square (Moselle Square). This is strongly supported.

Conclusion – Land use principles

47. In summary, the comprehensive, masterplanned residential-led mixed use redevelopment of the site accords with the expectations set out in the Local Plan site allocation and is supported in strategic planning terms, subject to further discussion and clarification regarding the provision of employment and social infrastructure use and means of securing this.

Housing and affordable housing

Affordable housing and viability

48. London Plan Policy H4 sets out a strategic target that 50% of new homes should be affordable to help address the substantial affordable housing need in London. London Plan Policy H8 requires that existing affordable housing is reprovided in estate regeneration schemes as a minimum and that these schemes should provide an uplift in affordable housing (in addition to the replacement of existing affordable housing). In addition, applicants should consider the availability of grant funding.

49. All development proposals that include the demolition and replacement of affordable housing are required to follow the Viability Tested Route. These applications must be subject to early and late stage viability review mechanisms, in line with the formulas and guidance in the Mayor's Affordable Housing and Viability SPG. Mid-term reviews will be required for a large multi-phased scheme such as this. Further discussion on the timing of the mid-term review mechanisms is required. The review mechanisms should be robustly secured in the S106 agreement. GLA officers request early engagement on the wording of these provisions to ensure they accord with London Plan requirements.

50. The applicant's illustrative housing mix assumes approximately 2,612 homes, including 500 social rent homes, 416 intermediate shared ownership homes, together with 1,696 market tenure homes. This equates to a gross affordable housing offer of 35% by unit, with a 55:45 tenure split which is weighted towards social rent. The applicant has stated that the scheme would achieve 40% affordable housing by

habitable room. The applicant has also committed to deliver fund 40% by unit should sufficient grant funding become available. This additional 'with grant' scenario should be secured in the S106 agreement, as with the Goodsyard and the Depot planning permissions.

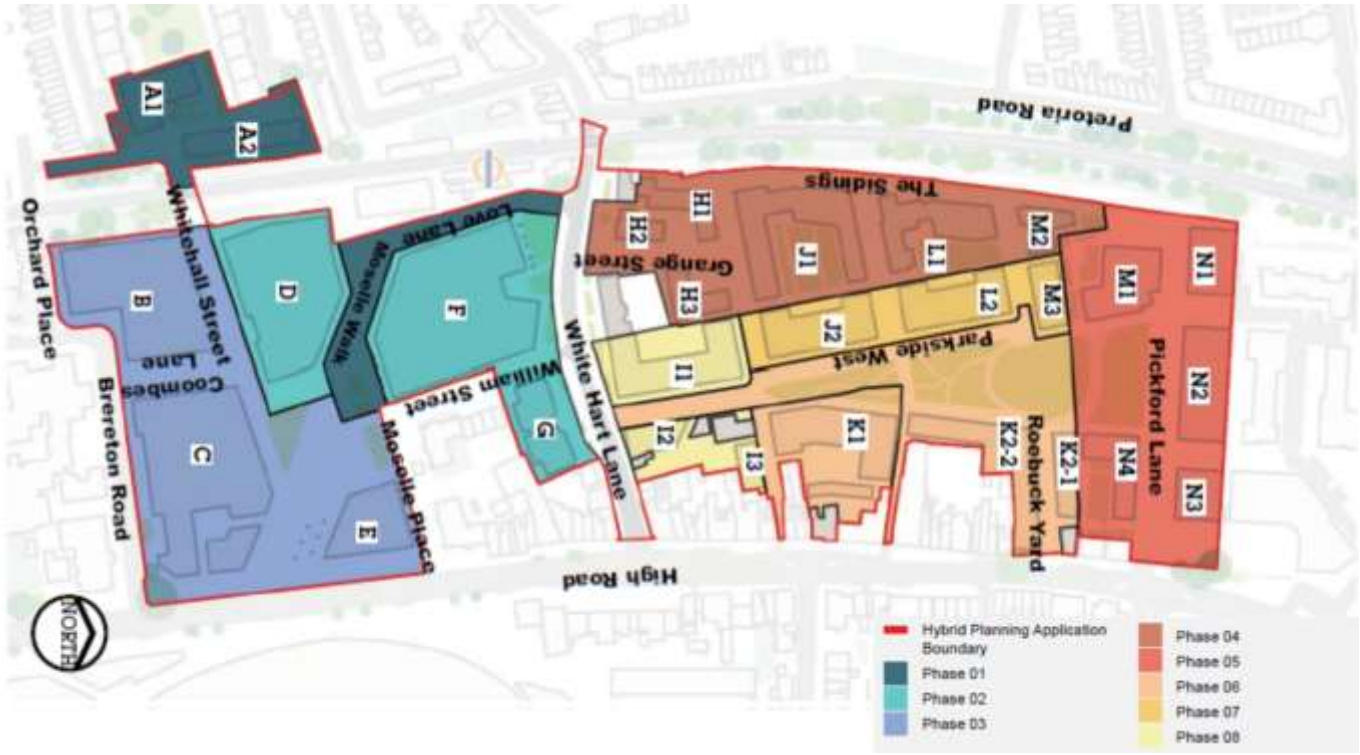
51. Once the existing affordable homes on site are accounted for, the net affordable housing proposed is 28%, with a 38:62 tenure split weighted towards intermediate shared ownership.

52. The applicant has submitted a Financial Viability Appraisal (FVA) which is currently being scrutinised by GLA officers to ensure this provides the maximum viable amount of affordable housing.

Phasing and delivery of affordable housing

53. The illustrative phasing of the proposed scheme is shown below. The first Phase (Plot A) is 100% social rent accommodation being the first decant phase. Within the first main phase which is defined as the development zones to the south of White Hart Lane, the applicant has committed to delivering 40% affordable housing by unit. Given the size and site specific circumstances of the scheme, GLA officers require further detailed discussion on the proposed S106 phasing obligations, which should ensure affordable housing delivery is programmed and secured, linked to appropriate triggers relating to the occupation of market homes. Details of the agreed phasing approach should be discussed and agreed with the GLA prior to the Stage 2 referral.

Figure 7 – illustrative proposed phasing



Housing affordability

54. The provision of social rent is strongly supported and should be secured by reference to target social rent levels. Potential service charges should also be fully considered and subject to appropriate caps to ensure overall affordability.

55. London Shared Ownership units should be affordable to households on incomes up to a maximum of £90,000 a year. A range of affordability levels should be provided below the maximum £90,000 household income cap for the first three months of marketing. Furthermore, intermediate tenure households should not be required to spend more than 40% of their net income on overall housing costs, including service charges.

56. Any intermediate rent products, such as Discount Market Rent (DMR) or London Living Rent (LLR) should be subject to a maximum income cap of £60,000. The inclusion DMR and LLR, alongside shared ownership would be supported to ensure a good range of affordability within the intermediate tenure housing.

57. GLA officers request early engagement on the wording of these provisions to ensure they accord with London Plan requirements.

Housing choice

58. The proposed mix for Plot A (the detailed element) which is 100% social rent comprises 42% three-bedroom homes and 6% four-bedroom homes alongside a relatively equal mix of one and two-bedroom homes. This has been informed by housing need studies, taking into account the households which require decant as part of the first phase.

59. Based on the applicant's illustrative mix (which is based on the illustrative masterplan for 2,612 homes), the scheme would be providing 16% family sized homes (3 and 4 bedrooms) across all tenures. The illustrative social rent tenure housing mix comprises 44% family sized homes. A total of 85 studios are proposed, all within the market tenure element of the scheme. GLA officers also note that the social rent provision is based on the needs of existing residents, in line with the Mayor's GPGER. As such, the overall mix of housing provision on the scheme and by tenure is acceptable and accords with London Plan Policy H10.

Play space

60. The detailed element would comprise 299 sq.m. of play space which exceeds the play space requirements across each age groups. The overall play space strategy within the masterplan and outline phases is supported. This would incorporate play space provision in two new large public spaces, providing public benefits for the wider community. A large playground is proposed at Peacock Park, with water based play located in Moselle Square. Additional play space provision would be accommodated within car-free 'home zone' streets and within blocks (at podium and rooftop level).

61. Whilst this overall strategy is supported, limited information has been provided to assess the play requirements based on the illustrative masterplan and illustrative mix in order to assess whether play space requirements are likely to be met within the proposed scheme. GLA officers would therefore welcome further clarification or background assessments which have been undertaken, noting the illustrative nature of the proposals. Play space provision, including its integration by tenure, should also be assessed and secured at each Reserved Matters Phase and secured by condition, in line with London Plan Policy S4. Play space provision should be available to all housing tenures within the immediately adjacent blocks and courtyards to promote social inclusion.

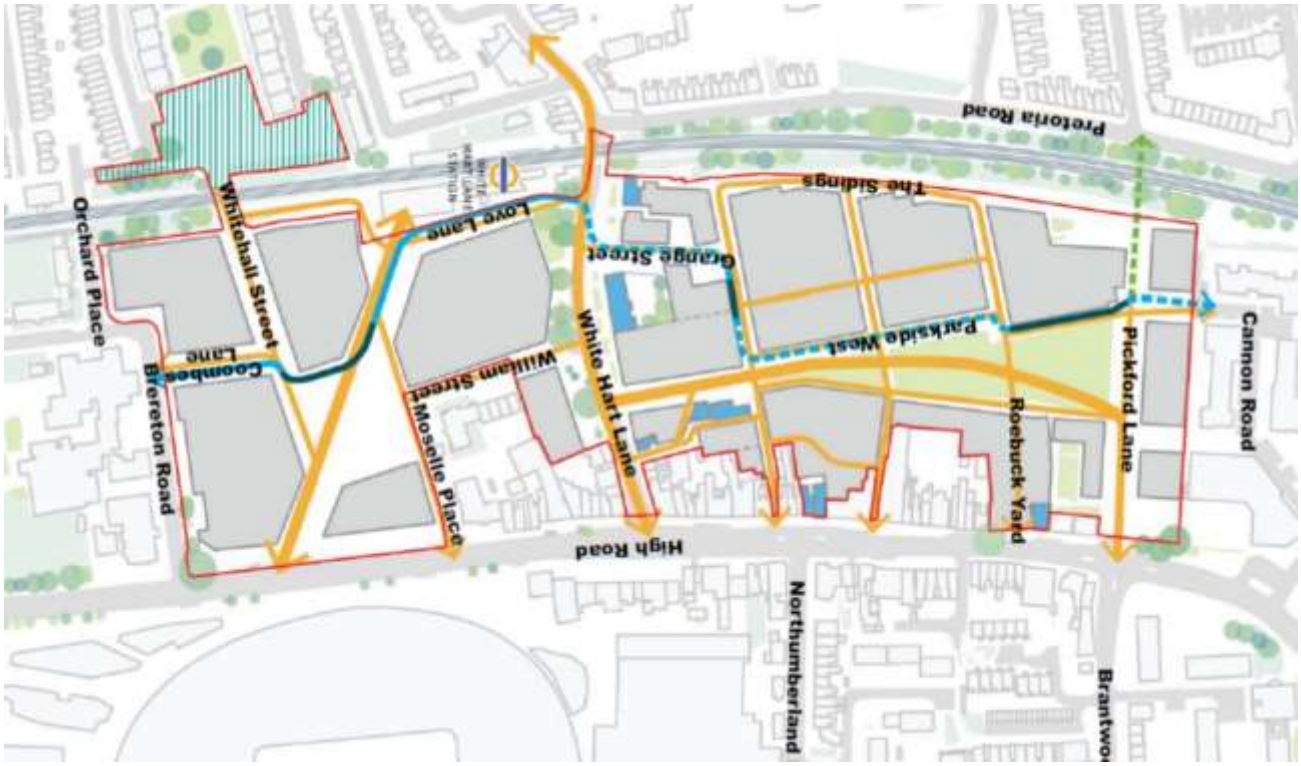
Urban design

Design, layout, public realm and landscaping

62. Overall, GLA officers consider that the proposed masterplan responds positively to these local and strategic urban design principles and the vision set out in the High Road West Masterplan (2014). The applicant's proposals are based on a series of clear and appropriately site-specific overarching urban design and place making objectives. This seeks overall to create a dynamic new urban neighbourhood, reinvigorating the High Road, providing generous public open spaces within the heart of the scheme which would be connected by a generously landscaped continuous public realm and movement framework, which seeks to better integrate the site into the surrounding urban context. Key moves within the proposed masterplan, which are strongly supported include:

    - the creation of the two main generously sized public spaces (Moselle Square and Peacock Park);
    - the framing and enclosing these key public spaces and routes with surrounding blocks and land uses to ensure the public realm is well-activated with positive overlooking from ground floor uses; and
    - the improvements in pedestrian connectivity, permeability and legibility, including in particular a new strong axial movement route linking the station to the High Road and football stadium.

Figure 8 – Proposed block layout, public open space and key movement routes



63. This overarching masterplan also seeks to respond positively to the surrounding heritage assets. The following urban design comments are provided on the key elements of the proposed scheme.

Southern site and civic square

64. The layout of the southern site ensures the provision of a clear and direct visual desire lines linking the stadium, High Road and White Hart Lane Station in both directions. The legibility of the station would be marked by the two tallest elements, with the stadium acting as the key visual focus in the other direction. Permeability and clear views across the square north-south and east-west would be provided, ensuring pedestrian connectivity benefits for the wider area.

65. The civic square (Moselle Square) would be enclosed appropriately on all sides by active non-residential uses. To the east, the four-storey pavilion building in community / leisure and retail use would provide a buffer to the High Road and mediate the scale and massing of the stadium. Double height commercial / community use is proposed on most of the blocks at ground and first floor level which is strongly supported in terms of ensuring the square has a vibrant and active character throughout the day and evening and across the week.

66. The sizing of the square at approximately 66 metres by 64 metres would be sufficiently generous, without being too large. The massing of Blocks C, B and D would also ensure the northern section of the space would receive direct sunlight. The BRE guideline for sunlight and daylight and overshadowing would be met which is welcomed. The access arrangements proposed allow for some limited servicing to the north of the square and rear of southern blocks. As a result, the main space would largely be free of vehicle movements, ensuring the provision of a large pedestrianised space. This is supported.

67. The width and dimensions of the main route through Moselle Square (Moselle Walk) has been defined to facilitate effective crowd flow movement between the station and stadium and potential queuing during busy event days. GLA officers understand that this has been developed and tested through engagement with key stakeholders, including the Metropolitan Police, as well as taking into account other factors such as wind, overshadowing and daylight and sunlight. This design-led approach is welcomed.

68. The emerging landscaping approach proposed for the square is reflective of the density and footfall associated with stadium events and match days and is understood to have been informed by initial consultation with the Met Police. A hard-landscaping approach is proposed, with water features and sculpture, as well as some large feature trees. This is considered appropriate given the multifunctional civic nature and footfall associated with the stadium.

The Northern site and Peacock Park

69. Peacock Park would be a substantial new linear urban park (200 metres in length and between 60 to 37 metres in width), with a strong overall landscape character comprising a mix of lawns, herbaceous planting areas, trees and sustainable urban drainage features and play space provision. This is strongly supported. The park would be well-fronted by the adjacent proposed blocks, with two-storey residential maisonettes with their own front doors lining the park on the west and north and commercial and community employment uses activating the ground floor to the east. This is supported.

70. The layout and design of the Goodsyard and the Depot sites reflects the existing planning permission. It is noted that the current application for the Goodsyard and Depot proposes a slightly different block and public realm arrangement. This removes the rear access route adjacent to the railway (the Sidings), which could potentially be poorly overlooked and unwelcoming after dark and would create a clearer north-south route as an alternative (Embankment Lane). This key move was supported by GLA officers, as set out in the Stage 1 report and is also understood to reflect land ownership and phasing opportunities. It is therefore recommended that the outline element in this part of the site is sufficiently flexible to allow this alternative layout to come forward, noting the design benefits set out above.

Roebuck Yards and Peacock Yards

71. The provision of Peacock Yards and Roebuck Yard would ensure a good mix of activities and land uses across the site, including light industrial and workspace uses. This would help to animate and overlook the relatively tight alleyway and rear yards lining the High Road buildings, helping to create a distinctive character area. Clear views of the park should be provided to ensure legibility.

Whitehall Mews

72. The layout strategy for Whitehall Mews is supported. The arrangement maintains the existing pedestrian access routes and would ensure an improved front to back arrangement, with rear gardens and clearly defined private defensible space and improved natural surveillance. The provision of duplex units within Buildings A2 and A3 is strongly supported.

Design code and parameter plans

73. The overall content and coverage of the design code and parameter plans is considered acceptable, noting the long-term multi-phased nature of the scheme, which will be built out over a number of years. The code captures the overarching urban design principles, vision and place making principles and site specific issues set out above, which are supported and translates this into clear design requirements and instructions which will inform subsequent Reserved Matters Application. This is acceptable.

<u>Height, massing and tall buildings</u>

74. London Plan Policy D9 states that tall buildings should only be developed in locations identified as suitable in development plans. Policy D9 also states that tall buildings must address their visual, functional, environmental and cumulative impacts and achieve exemplary architectural quality.

75. In terms of the local planning policy context, the site falls within a location which is identified as being suitable for tall buildings, as set out in the Tottenham Area Action Plan (2014). The AAP does not set out a prescriptive building height policy framework in terms of what heights could be considered suitable or considered a maximum height parameter. The High Road West Masterplan (2014) suggests heights of 10 to 18-storeys, with taller buildings placed towards the railway line. The Masterplan states that taller buildings should be placed near to the railway, with building heights stepped down towards the High Road. This seeks to sensitively manage the impact on heritage assets and residential amenity.

76. The illustrative scheme which GLA officers considered at pre-application stage proposes six towers ranging in height from 26, 32, 27, 18, 21, 29-storeys (south to north). The heights of the three towers on the northern site are consistent with that in the extant planning permissions. The height of buildings fronting the civic square would range from 2, 3, 4, 6, 7, 14, 18-storeys. On Peacock Park the height and massing would range from 6 to 10-storeys to the west and north, with 3 to 6-storeys to the east adjacent to the High Road. These heights have been translated into metres above ground level maximum heights by different block element, as illustrated below. The illustrative massing strategy is shown below.

Figure 9 – illustrative height strategy



77. This overarching strategy is in line with the High Road West Masterplan and site allocation, as well as the existing permissions in place on the Goodsyard and the Depot sites. GLA officers consider that this general height and massing strategy is well-considered, taking into account the various site opportunities and constraints, the existing and emerging context and noting in particular the need to step down heights towards the sensitive heritage context along the High Road but also recognising the potential opportunity to locate taller elements to mark the presence of the station and main transport corridor, as well as important east-west connections.

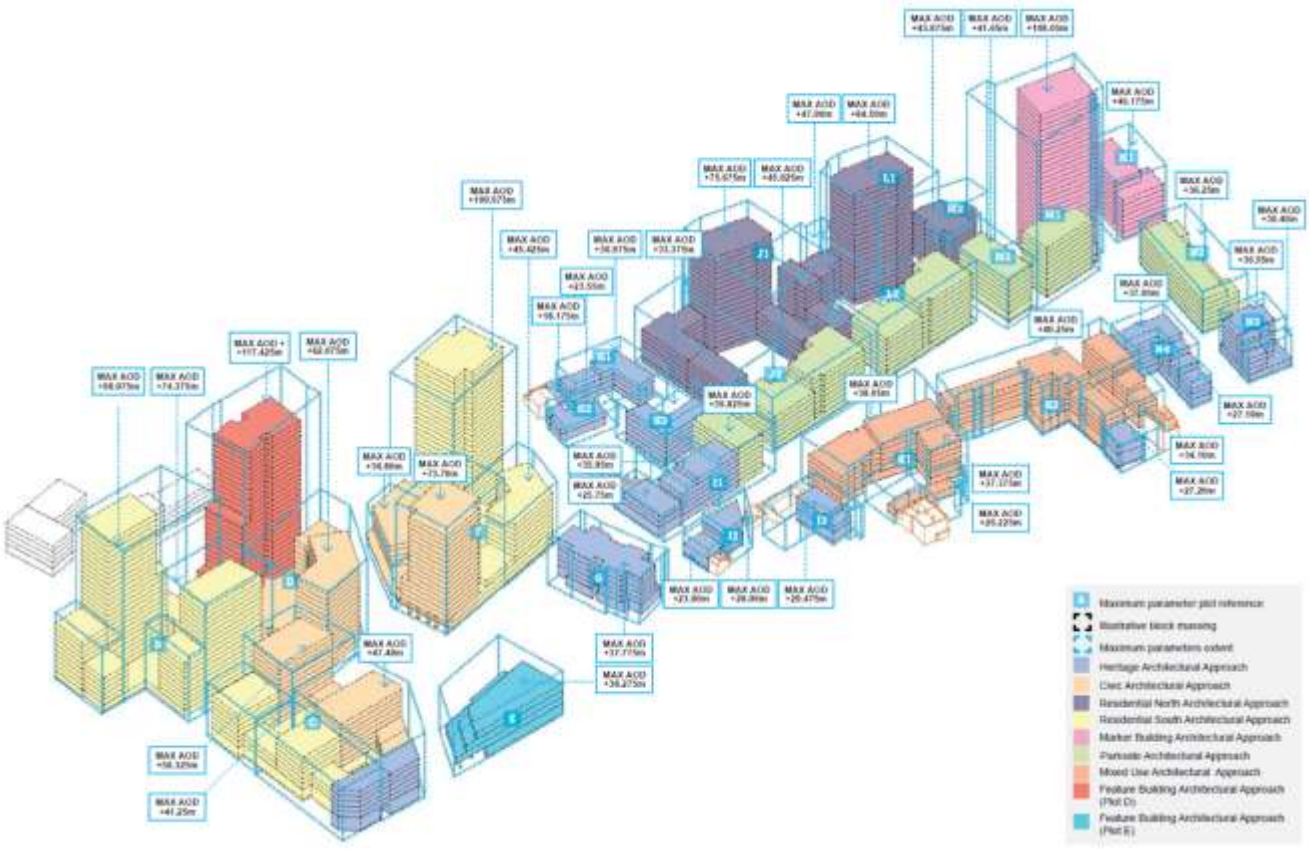
78. The varied massing of blocks surrounding the civic square and the location of the taller elements would ensure that the northern section of the public space receives direct sunlight. Similarly, Peacock Park would also not be overshadowed by the taller blocks, given its layout and orientation on a north south axis. In terms of the adjacent residential hinterland to the west, the elevated railway line and mature tree belt would ensure the impact of the proposed tall buildings would be to some extent minimised.

79. Shoulder and corner heights within blocks as well as the lower elements have been appropriately refined taking into account the need to enclose and define key public

open spaces and mark corners and important movement routes. This would also ensure a variety of building typologies and a varied massing is proposed throughout the scheme as a whole and within blocks. This has been specified clearly in the height parameter plan and design code on a block by block basis.

80. This overall approach to height and massing is therefore supported and considered an appropriate response to the opportunities and constraints, taking into account the existing and emerging surrounding context.

Figure 10 – illustrative masterplan scheme set against the maximum height parameters



81. Environmental impacts in terms of wind, daylight, sunlight and overshadowing have been assessed and have informed the design and massing approach. Overshadowing analysis demonstrates that the vast majority of communal amenity areas, including Whitehall Mews, Moselle Place and Peacock Park would have good access to sunlight, providing occupiers with access to sunlit outdoor space throughout the year. As can be expected with a regeneration scheme of this scale, there would be some parts of the scheme where access to sunlight is more limited at certain times of the year, or at times throughout the day and there would be some impacts on the daylight levels of neighbouring properties. However, the overall daylight levels which would be achieved and the impacts on the surroundings are considered to be broadly in line with other similar high density urban regeneration schemes such as this and do not give rise to an unacceptable level of harm. Furthermore, the potential to mitigate these impacts would be further reviewed at detailed design stage.

82. Heritage and visual impacts have been assessed taking into account the applicant's TVIA. Whilst the scheme would have a noticeable visual impact on the surrounding

area and would give rise to less than substantial harm to heritage assets, this is on balance considered acceptable, given the overall public benefits associated with the development, as set out in more detail below.

83. Given that the architectural detail and overall design and materials quality of the proposed tall buildings has not been finalised, it is not possible to fully assess compliance against the requirement in London Plan Policy D9 that tall buildings to be of an exemplary standard of architecture. This will require detailed assessment, townscape analysis and design review at RMA stage.

84. As set out below, the design code provides a suitable basis on which to develop RMAs for tall buildings in terms of advising on the approach to the base and top of tall buildings and the approach which should be followed materiality, detailing, articulation and overall design. This includes matters relating to the functional design, layout, entrances, servicing, public realm and active frontages, in line with the Policy D9 criteria. RMAs should also be subject to further environmental assessment and design review to ensure full compliance with London Plan Policy D9. The applicant has stated that each RMA would be supported by an initial design review, which is welcomed.

85. To conclude, the application complies with the locational requirements set out in Part B of Policy D9. GLA officers have assessed the visual, heritage, environmental, functional and cumulative impacts of the proposal, noting the permitted and Local Plan context as set out above. Overall, GLA officers consider that the height and massing of the scheme could comply with the qualitative assessment criteria set out in Policy D9. The architectural quality of the proposed tall buildings must be of an exemplary standard, which should be secured at RMA stage, in line with Policy D9.

Residential quality

86. The residential quality of the detailed element is of a good standard, with a good distribution of unit sizes and a broadly similar dual aspect provision. The larger units (3 and 4-bedrooms) all appear to be dual aspect which is welcomed. Duplex homes would have their own front gardens and front door entrances, with private rear gardens provided at podium level, with kitchens shown on the ground floor. This is strongly supported.

87. The core arrangement is well within the recommended unit per core benchmark in the Housing SPG. Private amenity space is proposed for all units in the form of balconies and terraces.

88. The illustrative masterplan scheme proposes 65% dual aspect units. The illustrative layouts suggest that a good proportion of corner and genuine through dual aspect units and two-storey duplex units at ground and first floor would be provided, which would need to be secured at Reserved Matters Stage, as required by the design code. No north facing single aspect units are proposed and the design code includes a number of clear mandatory design rules which would ensure an acceptable residential quality, in line with London Plan Policy D6.

89. Taking into account the particular site circumstances and the proposed density, GLA officers are satisfied that the provision of dual aspect units on the detailed element of the scheme has been maximised in line with London Plan. Overall, the application complies with London Plan Policy D6 and the residential quality is acceptable.

Architectural and materials quality

90. A simple architectural approach is proposed for the detailed element, with a visually pleasing and contextual brick palette proposed and appropriate detailing proposed to differentiate and define the entrances, windows and balconies. This is acceptable.

91. The design code includes appropriate specifications and design rules for key features of buildings and land uses in different areas of the scheme, depending on the location of each block. This approach is supported and would provide a good basis for the delivery of an architecturally rich and interesting approach in terms of materiality and overall design quality; however, the finished quality will depend on this overall design quality being delivered and secured at Reserved Matters Stage. This should be informed by further detailed design review.

Density and design review

92. The London Plan Policy D4 requirement for additional design scrutiny and design review is triggered in this instance given the height and density proposed, noting the height and density of the scheme. The applicant has undertaken a rigorous design-led process, informed by close collaboration with planning and design officers at the Council and the GLA, as well as numerous design review panels. This meets the requirements set in the London Plan. It is recommended that further design review scrutiny should be incorporated at Reserved Matters Stage, given the size of the scheme and tall buildings proposed.

Fire safety

93. A fire statement has been be prepared by a third party suitably qualified assessor and submitted as part of the planning application, as required by London Plan Policy D12. This sets out overarching principles for the masterplan (outline phases) and detailed (Plot A) element in terms of building construction, means of escape, passive and active fire safety systems and access and facilities for fire fighting services. Sprinkler systems would be provided in all buildings and land uses. Further detailed fire statements would be provided and secured at Reserved Matters Stage. This information provided meets the requirements set out in London Plan Policy D12.

Inclusive design

94. London Plan D5 requires all new development achieves the highest standards of accessibility and inclusive design with accessible housing design requirements set out in London Plan Policy D7. An inclusive design statement has been provided which details how the scheme would achieve a high quality of inclusive access throughout the land uses proposed and the detailed and outline elements. This is acceptable. Further conditions are required to ensure inclusive access is fully considered and secured at each phase. The application complies with the accessible housing standards in the London Plan Policy D7. This should be secured by condition.

Heritage

95. The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the tests for dealing with heritage assets in planning decisions. In relation to listed buildings,

all planning decisions should "*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*". If it is judged that harm to the heritage asset/s would arise from the proposed development, considerable importance and weight must be attributed to that harm, in order to comply with the statutory duties. In line with Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990, planning decisions must also give special attention to the desirability of preserving or enhancing the character or appearance of the conservation areas which may be affected by a proposed development.

96. The NPPF states that when considering the impact of the proposal on the significance of a designated heritage asset, great weight should be given to the asset's conservation and the more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. Where a proposed development will lead to 'substantial harm' to or total loss of the 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. Where a development will lead to 'less than substantial harm', the harm should be weighed against the public benefits of the proposal, including securing its optimum viable use. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

97. London Plan Policy HC1 states that development proposals affecting heritage assets and their settings should conserve their significance and should avoid harm. Policy HC1 also applies to non-designated heritage assets.

98. Having reviewed the applicant's Heritage, Townscape and Visual Impact Assessment (HTVIA) and noting the existing location, setting and significance of various heritage assets in the surrounding area, GLA officers have reached the following conclusion in terms of the level of harm caused to designated and non-designated heritage assets. The HTVIA has been undertaken at an appropriate time of year during the winter when leaves are not on the trees, so presents the 'worst case' scenario in terms of potential impact.

Heritage asset	**Level of harm**	**Scale**	**HTVIA view**
Listed buildings			
Grade II Listed 867-869	Less than substantial harm	Moderate	View 41
Grade II listed the Grange, 34 White Hart Lane	Less than substantial harm	Moderate	View 39
Grade II listed 797 & 799 High Road	Less than substantial harm	Moderate	View 32
Grade II listed 819-821 High Road	Less than substantial harm	Moderate	View 42
Grade II listed 639 High Road	Less than substantial harm	Low	View 21

Heritage asset	Level of harm	Scale	HTVIA view
Conservation areas			
North Tottenham Conservation Area	Less than substantial harm	Moderate	Views 21, 23, 32, 41, 42
Bruce Castle Park Conservation Area	Less than substantial harm	Low	View 14a, 15
Tottenham Cemetery Conservation Area	Less than substantial harm	Low	View 14b

99. In addition to this, the proposals include the demolition of numbers 731 to 759 High Road. These are unlisted non-designated heritage assets. Numbers 743 to 759 High Road are locally listed three-storey Victorian properties with modern commercial shop fronts. Numbers 731 to 741 also not locally listed but are of a similar age and historic and architectural character. Along White Hart Lane, numbers 8 to 16 and 24 to 30 White Hart Lane would also be demolished. These are unlisted two-storey Victorian high street properties. The majority of these buildings contribute positively to the character and appearance of the North Tottenham Conservation Area. The loss of these buildings would therefore give rise to less than substantial harm to the North Tottenham Conservation Area.

100. Harm caused by the demolition of these assets is considered to be justified in this particular case, taking into account the range of public benefits summarised below, which would outweigh the harm caused. The demolition of these unlisted properties allows for the provision of the community building (Plot E) and enhanced public routes into Moselle Square from the High Road. Similarly, the demolition of the above properties on White Hart Lane allows for the provision of a clearly defined new public route through to Peacock Park. These particular public benefits are significant as noted below and could not be delivered without the limited demolition which is proposed.

101. GLA officers have concluded that the level of harm caused to heritage assets would be less than substantial and at a low or moderate level on the scale of less than substantial harm. This would be clearly and convincingly outweighed by the public benefits proposed by the application, which include:

- Substantial delivery of new homes (up to 2,929 homes, including 500 social rent homes and approximately 400 intermediate homes).
- Significant affordable housing provision, with the scheme proposing 35% affordable housing (gross) across the site, with an aspiration to reach 40% gross, subject to viability and the availability of grant funding.
- Delivery of a new Library and Learning Centre, together with study spaces, a children's library and creative enterprise space, providing a new community and social hub.
- New public spaces and pedestrian and cycle connections, including two major new public open spaces at Peacock Park and Moselle Square and the new main public route linking White Hart Lane Station to the High Road and new Tottenham

Hotspurs Football Stadium and enhanced connectivity linking the site to the High Road

- Significant landscaping, public realm, inclusive access and urban greening improvements throughout the scheme.

- High quality, sustainable design with the new and replacement housing providing an enhancement on the quality of the existing housing stock being replaced in terms of internal floorspace, energy efficiency and overall residential quality.

Transport

Healthy Streets, vision zero, walking and cycling

102. As set out above, the proposals would provide a range of substantial pedestrian and cycle improvements. This includes Moselle Walk linking the station and stadium, a proposed new north-south cycleway running through the development site on the eastern side of the railway line and a major pedestrian route running through the centre of the northern site. This would then also connect through to the southern site via William Street, Moselle Square and Combes Lane. Enhanced public routes are also proposed via the new yard routes. This is strongly supported and would help to open up the site and re-connect it with the surrounding area. The potential for enhanced pedestrian crossing facilities over White Hart Lane would be supported. The applicant's approach to safeguard potential future links along the northern edge of the outline element and the neighbouring Cannon Road is also welcomed.

103. Whilst proposals for the internal street network are subject to outline, the applicant is encouraged to identify any improvements, no matter how small, in order to make a possible contribution to the delivery of Healthy Streets and Vision Zero policies, specifically the route under the bridge along Whitehall Street to support the detailed element.

Access and deliveries and servicing

104. Access by all modes will be accommodated via Tenterden Road, Church Road, White Hart Lane and the High Road. The majority of the development will be serviced through a series of public two-way and one-way streets within the proposed internal network. However, a number of designated shared surface lanes are proposed, allowing restricted access to servicing routes to accommodate service, emergency and larger vehicles along routes otherwise only open to pedestrians and cyclists. Stage 1 Road Safety Audits (RSA) along all shared surface lanes should be completed prior to the determination of detailed planning permission at RMA stage.

Bus infrastructure

105. The development proposals will see an increase in pedestrian and cycle trips to/from the site and the local area, as well as public transport trips. However, there is limited detail on how the new major pedestrian route, following a key desire line between White Hart Lane station and the stadium, will impact on the bus stop (T) on High Road, including its current location, bus stop environment and passenger waiting area.

Car parking

106. Whilst there is no car parking provision within the detailed blocks, two on-street Blue Badge car parking spaces in line with the required 3% are proposed along Whitehall Street. Additional disabled persons' car parking spaces, equivalent to seven per cent of the dwellings could be provided, should the initial provision be insufficient. These spaces are a distance from the blocks however, this is due to the highway constraints in this location so is largely acceptable, subject to the provision of a safe, convenient, direct and accessible access route.

107. For the outline phases, 10 on-street spaces are envisaged in the illustrative masterplan, alongside 48 podium spaces and 31 basement level spaces. This would equate to a car parking ratio of approximately 3%, which appears to be in line with the London Plan. The applicant has also stated that there is space to ensure provision up to 10% should this be required. The applicant is expecting to re-provide existing car parking for decanted residents remaining on the site. However, this has not been specified and this should be clarified.

108. As per the GLA's pre-application advice, any replacement car parking needs to be provided for the occupancy of the returning resident only and be secured by legal agreement along with the requirement to produce a Car Parking Management Plan (CPMP), which will detail how the spaces will be monitored, managed and enforced. A permit-free obligation should be secured to prevent any new occupier access to the on-street car parking provision within the CPZ, other than the disabled spaces as agreed.

109. The majority of the residential car parking would be provided using concealed ground floor podium structures, parking courts or basements to avoid this negatively impacting the quality of the public realm or key public open spaces. A limited quantum of car parking is provided on-street where on-plot parking strategies are not possible. This design approach is acceptable.

110. Electric vehicle charging provision will be provided in excess of the London Plan requirement. This is welcomed in line with London Plan Policy T6.1 and should be secured by condition. The applicant should ensure that physical infrastructure should not negatively affect pedestrian amenity in line with London Plan Policy T6.

111. Car club provision is also proposed which would be in the public realm and should be secured via s106 agreement. In line with the MTS and the London Plan, clarification is necessary to demonstrate how the overall car parking provision/supply is being capped, as a result of the creation of car club spaces.

Cycle parking

112. As part of the detailed element a total of 119 long-stay and 4 short-stay cycle parking spaces is proposed. Whilst this number accords with the London Plan minimum cycle parking standards, further details on the cycle parking provision is required, which could be secured by condition and considered in detail at RMA stage when sufficient design detail is available. All cycle parking must be in accordance with the London Cycling Design Standards (LCDS), including at least 20% Sheffield stands and a further 5% wider spaces for non-standard bicycles.

Trip generation and public transport and highways impacts

113. The applicant is required to provide updated bus trip generation figures. Subject to the outcome of any additional assessment, officers may seek mitigation towards enhancing bus priority measures and/or fund infrastructure upgrades. Further information on this will be provided in TfL's detailed comments on the application. The development is not expected to have a significant impact on the strategic road network.

Technical Approval and Infrastructure Protection

114. Whilst TfL have no objection in principle to the proposed development in relation to the site's adjacency to the railway lines, the future planning consent should include appropriate infrastructure and operational protection measures. TfL requires that the applicant enters into an Asset protection Agreement with RfL.

Travel Plan

115. The submitted outline residential Travel Plan (TP) and Framework Travel Plan (FTP) for the non-residential uses are generally acceptable. The focus on active travel is welcomed. The final TP and FTP and all agreed measures should be secured, enforced, monitored and reviewed through the Section 106 agreement, in accordance with Policy T4 Assessing and mitigating transport impacts of the London Plan.

Deliveries and Servicing and Construction Logistics

116. The outline Delivery and Servicing Plan (DSP) and outline Construction Environmental Management Plan (CEMP) along with the Operational Waste Management Strategy are welcomed and the contents of these documents are found to be broadly acceptable. Due to the phased nature of this development proposal (within a multiple land ownership site) with this detailed element being the first phase of a long-term and comprehensive regeneration of High Road West to be delivered by the applicant, this application will require the adoption of a coherent wayfinding strategy to enable people to access and find the stadium and other key local attractor destinations. The RMA should make clear how the development and construction operations will be managed alongside the continuation of the operations of the stadium and other key local attractors. The full DSP and CEMP, which needs to include infrastructure protection measures in respect of the adjacent railway lines, should be produced in accordance with TfL guidance and secured by condition. This is particularly important, as High Road is a key bus corridor.

Sustainable development

Energy strategy

117. The applicant's energy strategy estimates that the residential element of the scheme would achieve a 60% reduction in CO2 emissions over and above Building Regulations, with the non-residential element achieving a 52% reduction. Of this the residential element would achieve a 12% reduction via energy efficiency savings alone. Of the non-residential element, 17% reductions would be achieved via energy efficiency measures. Whilst this does not comply with the zero carbon target, the

scheme does meet the minimum required on-site levels of reduction in CO2 emissions which are set out in the London Plan.

118. In terms of heat generation, the scheme proposes to connect to the planned Haringey District Heat Network (via Meridian Water District Heating Network (MWHN)) and is proposing to connect to the network. Primary energy to the DHN will be supplied from the Borough Wide District heating network supplied by the Meridian Water Energy from Waste Plant operated by Energetik. This approach is supported, in line with the London Plan heating hierarchy. Further clarification is sought that the DHN operator has confirmed that the DHN has the capacity to serve the new development, together with supporting estimates of the CO2 emission factor, installation cost and timescales for connection. The s106 should then secure this approach, alongside the potential back-up option.

119. In the event that connection to the DHN is not feasible, the applicant has proposed detail of a backup solution in the form of a centralised Air Source Heat Pump System (ASHP) system. The details of this backup ASHP System have also provided, as requested at pre-application stage.

120. For Plot A, temporary heating arrangements are required as the site will be complete prior to the DHN being operational. This would comprise gas boilers within a centralised plant room. The applicant should also confirm measures to minimise NOx emissions from this temporary energy system, which should be secured by condition.

121. A detailed roof layout has been provided for Plot A demonstrating that the roof's potential for a PV installation has been maximised and clearly outlining any constraints to the provision of further PV, such as plant space or solar insolation levels. This approach to maximising solar PV provision should be secured by condition across the RMA phases of the scheme.

122. The risk of overheating has been assessed using the CIBSE TM59 methodology. The passive design measures specified in the overheating assessment in terms of solar glazing and maximising natural ventilation should be secured (option 6).

123. London Plan Policy SI2 requires the energy performance of completed developments to be monitored, verified and reported following construction ('Be Seen'). This should be secured.

<u>Whole Life-cycle Carbon</u>

124. A Whole Life-cycle Carbon Assessment has been undertaken in accordance with the London Plan, which takes into account the draft GLA Guidance (2020). This reviews the embodied carbon emissions associated with the proposed development, taking into account the materials quantities and loads, the operational energy consumption of the built scheme, with total emissions estimated and compared to the GLA benchmarks. The report outlines a range of opportunities which could be undertaken to reduce the carbon associated with the development at the more detailed design stage when materials are being selected and specified. This further review should be secured through a pre-commencement condition. A post-construction monitoring report should be secured by condition for each phase.

Circular Economy

125. A Circular Economy Statement has been submitted which takes into account the GLA's draft guidance (2020) and outlines how circular economy principles will be incorporated in the design, construction and management of the proposed development, including through minimising materials use and the sourcing and specification of materials; minimising and designing out waste at various stages; and by promoting re-usability, adaptability, flexibility and longevity. This is supported and complies with London Plan Policy SI7. A post-construction report is proposed by the applicant which would provide further details which should be secured via a planning condition for each phase.

Digital connectivity

126. Policy SI6 requires development proposals to ensure sufficient digital connectivity, including full fibre connections and mobile connectivity, and provide space for mobile digital connectivity infrastructure. Development proposals should ensure that sufficient ducting space for full fibre connectivity infrastructure is provided to all end users within new developments, unless an affordable alternative 1GB/s-capable connection is made available to all end users. This should be secured by condition.

Environmental issues

Urban greening

127. Existing mature trees along White Hart Lane, to the rear of the Grange, along the High Road would be retained which is welcomed. A number of other trees would need to be removed within the existing Love Lane Estate, which is justified due to the comprehensive redevelopment and redesign of the estate. The scheme proposes approximately 280 new trees throughout the scheme as compensation. This overall approach is acceptable and should be secured, in accordance with London Plan Policy G5.

128. The applicant has undertaken an urban greening factor (UGF) assessment in accordance with the London Plan. This shows that the detailed element of the scheme would achieve a UGF score of 0.37. The proposals include intensive and extensive areas of green roofs, tree planting, flower rich perennial planting, rain gardens, hedges, green walls and permeable paving. The opportunity to maximise urban greening has been maximised, taking into account the site extent, dimensions and the proposed development.

129. The entire illustrative scheme achieves a 0.22 UGF score. Whilst this falls short of the relevant UGF targets in the London Plan, this would provide a substantial uplift based on the existing UGF score for the site (0.07). There are some site specific reasons for this relatively low score give the size of the site. Moselle Square needs to be primarily hard landscaped due to the high footfall and civic purpose of this space. The applicant has also stated that its current assessment represents a relatively cautious estimate, given the outline nature of the scheme and because a number of the elements have not been fully maximised in terms of their design detail and their contribution to the overall UGF score, e.g. green roofs and landscaping. Whilst this is acceptable at this stage, conditions should be included which require each RMA to

demonstrate that the potential for urban greening has been maximised, in line with the London Plan and UGF benchmark targets.

130. The illustrative masterplan is expected to achieve the aspiration for biodiversity net gain. Conditions should be included to ensure this is subject to further assessment at RMA stage, in accordance with London Plan Policy G6.

Sustainable drainage and flood risk

131. The site lies within Flood Zone 2 with areas of a high risk of surface water flooding along the High Road and White Hart Lane according to the Environment Agency maps. The site is dissected by the Moselle Culvert which runs below White Hart Lane. The drainage strategy for the site aims to protect and incorporate the Moselle Culvert into the masterplan.

132. A range of sustainable urban drainage (SuDs) methods are proposed throughout the illustrative masterplan, including wetland and ecological area detention basin within Peacock Park, rain gardens and a more civic urban wetland environment within Moselle Square, featuring water-based play features. Other proposed SuDs features would comprise green roofs, blue roofs and permeable paving. This would be supplemented by underground storage attenuation tanks. This overall drainage strategy is expected to reduce the existing surfacing water discharge rate on the northern section of the site by 70% and the southern section of the site by 50% during a 1 in 100-year storm event. This is acceptable and in line with the drainage hierarchy set out in the London Plan Policy SI13.

133. Flood risk management and mitigation measures are proposed including raising the existing site levels, finished floor levels and through the proposed location of ‘more vulnerable’ ground floor uses. These measures should be secured in accordance with London Plan Policy SI12.

Air quality

134. The development is not expected to give rise to significant impacts in terms of air quality, subject to appropriate conditions being included to mitigate potential temporary impacts during the construction phase. No specific mitigation measures are considered to be required to address any risks of exposure to poor air quality in terms of residents within the scheme. This is acceptable and complies with the London Plan, subject to appropriate conditions being secured. Air quality positive statements should be secured at RMA stage, in line with London Plan Policy SI1.

Noise

135. The applicant’s noise and vibration study does not raise any concerns in relation to the impact of the scheme or the potential for residential accommodation to be exposed to adverse noise impacts. However, should any noise impacts be identified at RMA stage, for example, due to noise levels associated with the High Road, railway and football stadium, these should be addressed with appropriate sound insulation and balcony design incorporated from the outset, in line with London Plan Policy D14.

Local planning authority's position

136. Haringey Council planning officers are currently assessing the application. The application is expected to be considered at a planning committee meeting in February or March.

Legal considerations

137. Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged; or, direct the Council under Article 6 of the Order to refuse the application; or, issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application (and any connected application). There is no obligation at this stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

Financial considerations

138. There are no financial considerations at this stage.

Conclusion

139. London Plan policies relating to estate regeneration, land use principles, housing and affordable housing, urban design, tall buildings, heritage, inclusive design, transport, climate change and urban greening are relevant to this application. Whilst the proposed scheme is broadly supported in strategic planning terms, the application does not fully comply with these policies, as summarised below:

- **Estate regeneration:** The scheme would ensure the like for like replacement of existing affordable housing and the right to return for all social rent households. The approach to leaseholders and public consultation would comply with the Mayor's key principles on estate regeneration. Therefore, the comprehensive redevelopment of the estate could be supported in this case, subject to the maximum viable level of affordable housing provision being secured.

- **Land use principles:** the comprehensive residential-led mixed use redevelopment of the site accords with the expectations set out in the Local Plan site allocation and is supported in strategic planning terms, subject to further discussion and clarification regarding the provision of employment and social infrastructure use and means of securing this.

- **Housing and affordable housing:** The applicant's Financial Viability Assessment (FVA) is being scrutinised to ensure the scheme is providing the maximum viable level of affordable housing. Early, mid and late stage viability

review mechanisms will be required. Affordability levels on intermediate housing should be secured.

- **Urban design:** The design and layout is strongly supported and is aligned with the High Road West Masterplan Framework. The density is supported, noting the design-led approach undertaken. The residential quality is acceptable.

- **Tall buildings:** The height and massing proposed can be supported in this plan-led location and the scheme would overall comply with the qualitative criteria set out in London Plan Policy D9 in respect of visual, heritage, functional, environmental and cumulative impacts. The architectural and materials quality of tall buildings should be of an exemplary standard.

- **Heritage impact:** The harm to heritage assets would be less than substantial. This would be clearly and convincingly outweighed by the public benefits proposed by the application.

- **Transport:** Updated bus trip generation figures should be provided to enable officers to fully assess the impact on bus capacity and clarify whether any mitigation is required. Conditions should secure further details regarding car parking, cycle parking and Road safety Audits.

- **Climate change:** The approach to energy, drainage and urban greening is generally acceptable, subject to conditions and obligations.

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We are committed to being anti-racist, planning for a diverse and inclusive London and engaging all communities in shaping their city.

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Appendix 5: Planning Sub-Committee Minutes

HGY/2021/3175

The Committee considered the pre-application briefing for the hybrid planning application seeking outline permission for the demolition of existing buildings and for the creation of a new mixed-use development comprising residential (Use Class C3), commercial, business and service (Use Class E), leisure (Use Class E and Sui Generis) and community uses (Use Class F1/F2) together with the creation of a new public square, park and associated access, parking and public realm works with matters of layout, scale, appearance, landscaping and access within the site reserved for subsequent approval; and full planning permission for Plot A including the demolition of existing buildings and the creation of 60 residential units (Use Class C3) together with landscaping, parking and other associated works.

The applicant team and officers responded to questions from the Committee:

- It was clarified that the proposal would provide space for a possible bridge over the railway, as set out in the masterplan. It was also confirmed that it was intended to provide the library on the ground floor.
- It was noted that the proposals would aim to provide at least 35% affordable units by habitable room, with 500 social rent units, 406 shared ownership units, and the remaining units for market sale. The Committee understood that the current proposal was just under 35% and that, under the London Plan, the Mayor was seeking at least 50% affordable units to be delivered on publicly owned land. It was noted that the council owned the majority of the land south of White Hart Lane but that the proposals did not appear to be seeking this level of affordability. The applicant team explained that the figure of 50% related to surplus public owned land, for example where public bodies were disposing of land that was surplus to requirement. It was noted that the applicant was aiming to deliver at least 35% affordable housing across the masterplan and was achieving 40% in the south of the site; they were exploring different funding options and would provide additional affordable housing if possible.
- The Committee noted that there were multiple density figures set out in the report and enquired what the density of the proposal would be. The applicant team commented that there were different ways to calculate density, with varying levels of detail, which could produce slightly different figures. It was also noted that the density calculations which related to land area would be affected by green spaces, such as Peacock Park, which could explain some of the differences.
- The Committee welcomed the size of the social rent units, including the higher proportion of 3-bed and 4-bed units, and enquired whether additional larger units could be provided. The applicant team explained that the social rent unit proposals were bespoke to the needs of community based on the results of consultation. It was added that the initial phase of delivery would focus on rehousing the existing residents.
- In relation to car parking, it was set out in the report that, if needed, a further 7% car parking could be provided; it was enquired when this would be assessed. The applicant team stated that, following consultation, anyone in the Love Lane estate with existing parking would be given the opportunity to

retain their parking but that the rest of the masterplan was more aligned with the London Plan and it would be aimed to provide blue badge parking only. It was added that, if space for car parking was not needed, the applicant would look to repurpose this space.

- The applicant team stated that there were a number of landowners in the wider area. It was explained that the regeneration element of the proposal would be delivered first and that, during this time, it would be possible to work with other landowners.
- The Committee noted that the scheme would be tenure blind but queried whether this was accurate as the council units would be delivered in a specific location, at the southern end. The applicant team confirmed that phase one of the scheme, which would be developed first in the schedule, was purely affordable housing. It was highlighted that there would be no difference in the approach to buildings for affordable and private housing, although the detailed design would be presented later on. It was added that the south of the site would incorporate a mix of different uses.
- It was commented that 35-36% of the units would be single aspect and it was asked whether this could be improved. The applicant team explained that this was being considered and that there were some areas in the masterplan with more flexibility than others.
- In relation to the design of the proposal, it was commented that there was a gradual increase in building height from the east to the west but that the view from the west, and also the south, would be quite stark. It was requested that these views were provided so that the impact on this area, including public benefit and heritage, could be fully considered. The applicant team noted that a full set of views would be provided as part of the application.
- It was suggested that it would be beneficial to manage waste on site through a combined underground system and enquired whether there would be car charging points. The applicant team noted that the proposal would have to meet the council's standards for waste and that there was an ambition to provide a communal waste solution. It was also aimed to provide electric charging points for cars.
- The Committee queried the acceptable daylight and sunlight levels which were set at 15% and asked how this compared to the average level in other projects. The applicant team noted that the proposal was situated in an urban location. It was explained that the Building Research Establishment (BRE) testing process set the levels against which the proposals would be compared and that the majority of the buildings would be required to meet these levels. It was added that the detail of these assessments would be shared in due course.
- It was noted that there would be strong cycling infrastructure as part of the scheme and that the full details would be set out in the application.
- In relation to wind levels, the applicant team stated that wind tunnel testing was considered to be the most accurate form of testing. It was explained that the scheme had undergone three rounds of testing and that each block would be fully tested to ensure that it was appropriate.
- It was explained that Lendlease's policy was to reach net zero carbon emissions by 2025 and absolute zero by 2040. It was added that they were moving all of their construction sites to be fossil fuel free by 2022 and were

converting to 100% renewable electricity. It was also hoped to move a number of targets forward where possible and to use very few offsets.

- The Committee acknowledged that the proposals would have practical design that would involve low maintenance requirements but expressed some concerns that this would lead to underinvestment in the long term. The applicant team noted that the scheme would aim to provide more focused, manageable public spaces. It was explained that there would not be disparate, small, public spaces as these had historically led to maintenance issues.
- Some members of the Committee noted that a number of events took place at the nearby Tottenham Hotspur Stadium and enquired how the impact of this on the area, including the impact on the W3 bus, would be mitigated through the design of the estate. The applicant team explained that work was ongoing to alleviate issues through the masterplan, including work with residents.
- The Assistant Director of Planning, Sustainability, and Building Standards noted that the Tottenham Hotspur Stadium had its own permissions and consents and that there was a specific business and community liaison group to shape and influence some of the issues raised. It was acknowledged that the design and layout of the current proposal should allow for crowds and other uses of the area but it was highlighted that the Committee should focus its questioning on the application in question.
- Some members of the Committee commented that there was a lot of churn in flats in the area, which could impact the local community spirit and character, and it was enquired how the applicant would mitigate any excessive purchase of units by private companies. The applicant team explained that they were committed to selling locally with a broad amenity-based offering and different types of homes and spaces. It was noted that the agreement between Lendlease and Haringey had a contractual obligation to sell locally in the first instance and that Lendlease undertook their own monitoring relating to buyers.
- The Committee commented that the design of Plot A was not architecturally interesting and it was suggested that this could be improved, possibly with some detailing or additional ideas. It was also noted that projecting balconies were not considered to work well for residents and it was queried whether the proposed heights would sit well with the neighbouring streets. The applicant team commented that these queries had lengthy responses, particularly around the incorporation of the history of the site within the design, and that further details could be shared. It was added that the proposals did include projecting balconies but that these helped with overheating and that the depth of the flats and design of the balconies meant that the units remained quite private.
- It was clarified that there would be no residential units on the ground floor by Moselle Square. It was also explained that the podium gardens would be located at first or second storey level. The provision of amenity space, including doorstop play space, would be prioritised at podium level before being provided on lower rooftops.
- It was noted that the Quality Review Panel (QRP) had expressed some concerns about the wind levels in the proposals. The applicant team explained that the second round of testing had been shared with the QRP but that there had been a further, third round of testing and it was hoped that this

would allay any concerns. The Committee noted that the application should provide assurance that the proposals would deliver comfortable spaces in relation to wind levels.

- It was enquired whether the site could be divided so that the part of the site that was council owned would be used for 100% social rent homes and the remaining part of the site would be required to provide 35% affordable homes. The Planning Officer explained that officers were not able to develop a strategy for an application in this way but would scrutinise and test proposals against policy and financial viability. Officers from Regeneration and Economic Development noted that the scheme had been developed over many years, including the procurement of a development partner and delivery in accordance with the development agreement. It was explained that the council had identified that there were requirements for external support and it was considered that this was a strong scheme that could not be delivered using an alternative method. It was added that it would not be practical to deliver elements of the scheme differently at this stage.

Development Management Forum 13 October 2021 – High Road West site (land at Whitehall Street and between the railway and the High Road from Brereton Road in the south and the B&M supermarket in the north), N17.

Overall proposals are: Demolition of most buildings and the retention of others; redevelopment to provide approx. 2,600 new homes (including 60 homes on site of No. 100 Whitehall Street & Whitehall & Tenterden Community Centre), shops, leisure, community and business uses in a range of buildings between 2 and 32-storeys, together with a new park and public square.

A virtual MS Teams Development Management (DM) Forum was held on 13 October 2021 at 7:30 PM.

Three local residents/interested people and Councillors John Bevan, Erdal Dogan, Sarah Jones and Yvonne Say logged on to the meeting. Also attending were members of the applicant team and Haringey officers. Attendees were advised that the meeting was being recorded. One local person had microphone problems and officers read out his questions from the meeting chat to ensure that they were able to make all the points they wished to make.

The key planning issues highlighted at the meeting by individual residents and Councillors were as follows (these have been grouped and are not necessarily in the order in which they were raised):

- Workings of the area on stadium event day
- Density, privacy and overlooking, daylight and sunlight
- Affordable housing, Council rents and service charges
- Private housing sale values & marketing
- Housing service charges to cover costs of managing & maintaining proposed spaces
- Flooding and drainage
- Transport – ability of area to cope, cycling & parking
- Land in third party ownership

Workings of the area on stadium event day

- Concern that the proposed Moselle Square and surrounding area needs to be suitable for large crowds on stadium event days and also provide a space for residents. Also concern that the proposed new library would be located in this area, which could be difficult to access at such times. Local people need to feel safe.
- The issue is less about football crowds (who tend to be regular and know how the area works on event days), but crowds for other events – such as NFL games and boxing. The area suffered badly during the recent boxing match (when capacity was increased to 67,000) – with the area in ‘gridlock’ until

1.00am, people using gardens and spaces as a toilet and rubbish everywhere etc. Concern that emergency vehicles could not get through if they needed to, ability of local people to get off trains and safety of women walking home.

- Applicant response: Moselle Square and other spaces are being designed first and foremost for residents. Intention is to create spaces that help manage crowds better and increase the capacity of the area to cope – not to encourage crowds to gather (spaces and widths have been sized to cater with people walking through). Met. Police Design Out Crime Officer and others consulted.
- Officer response: The Council as Local Planning Authority needs to scrutinise proposals and consider whether they would improve the current situation on event days (on-going discussion in other forums).

Density, privacy and overlooking, daylight and sunlight, play space

- Concern at proposed high density – both number of proposed homes and height of buildings have continued to increase over the last few years (questions over whether this is the type of place that local people have been saying they want).
- Serious concern at overlooking across spaces and between homes themselves – with the proposed tall buildings being close to each other. Also concern about inadequate daylight and sunlight (particularly on lower floors and overshadowing of spaces and general 'liveability' of the scheme).
- Concerns that the proposed tall buildings would overwhelm and overshadow the Headcorn and Tenterden area to the west of the railway. People here feel forgotten/excluded from regeneration.
- Concern over whether proposed play space is adequate for the density
- Applicant response: The proposals include a range of heights, including low-rise (5-7-storeys) as well as taller buildings. Focused taller buildings to the west, around the station and next to the railway and away from the High Road and its heritage buildings.
- The scheme would benefit from large spaces (above the railway lines and proposed new Moselle Square and Peacock Park).
- Lots of testing of daylight and sunlight has been undertaken – informing the size of streets and courtyards (not fixed, but likely to vary – with some streets about 11-12m and others about 18-20m and courtyards ranging from 21-37m) to ensure good levels of daylight for homes. Seeking to establish principles at this stage. There would be lots of opportunities to work with local people on detailed designs if 'outline' permission were to be granted.
- There would be some impacts on surrounding areas, but seeking to minimise.
- Officer response: An 'outline' permission would establish parameters – this is a large scheme that, if approved, would come forward in phases and there would be more time to discuss and consider detailed proposals.

Affordable Housing, Council rents and service charges

- Questions about affordable housing and whether rents would be the same as Council rents. The offer is for rents to be 'only' 10% above existing rents – but this is only for existing Love Lane Estate residents. Concern, that local people do not know how much higher rents would be.
- Applicant response: Not the place to discuss commitments given by the Council during the ballot process. The applicant is trying to balance affordability with aspirational change. Also considering affordability/rents of commercial spaces.

Private housing sale values & marketing

- Concern at the impact the scheme would have on rents and values in the surrounding area.
- Would the applicant be willing to market homes to local people first, before marketing to others (including those living abroad)?
- Applicant response: Intending to build a mix of homes (rent and for sale) that would be affordable. It has already given a commitment to the Council to market locally before more widely.

Housing service charges to cover costs of managing & maintain proposed spaces

- Concern that new high-quality spaces (welcome in principle) could result in high service charges for residents. Want the Council as Local Planning Authority to cap service charges.
- Applicant response: The applicant wants a well-managed estate and is trying to design homes and landscaping with relatively low management and maintenance requirements (e.g. ability to clean windows from inside homes).
- Future management would be the responsibility of a management company – that would include representatives of the developer, Council and residents. Opportunities for income generation to help keep down service charges

Flooding and drainage

- Concern at prospect of increased rainfall and flooding of White Hart Lane. Recent works not attractive (weeds), cannot cope with rain and road markings not clear – so difficult to know where to cross etc.
- Applicant response: A comprehensive approach should help to manage flood risk and aim is to improve the existing situation by additional planting as well as improved conventional drainage.

Transport – ability of area to cope, cycling & parking

- Concern at ability of the area to cope with proposed increase in density? What are proposals for cycling and car parking?
- Applicant response: Recent improvements to White Hart Lane Station means it would have capacity to serve the proposed development. Looking to incorporate good cycling routes. Commitment to re-provide car parking for existing residents – but other than that the focus is on providing accessible Blue Badge spaces. Cycle route designed into proposal.
- Officer response: The Council as Local Planning Authority has strong policies to encourage active travel and will be scrutinising the application to ensure that it supports walking and cycling.

Land in third party ownership

- How would land not owned by the Council or developer be used?
- Concern that the proposals amount to a 'land grab.'
- Applicant response: Council owns most of land south of White Hart Lane – where early phases would be focused. There is time to keep talking with Tottenham Hotspur FC, Peacock Industrial Estate and other land owners about their land (the proposed scheme allows for the Spurs owned land to be developed by them).

The applicant thanked people for comments and assured the meeting that they would take away issues and consider. The applicant also provided an email address for people to send further comments and signalled willingness to keep consulting and discussing the scheme. Officers noted that a number of planning and other issues had been raised and that they will consider further.

Meeting concluded at 8.55 PM

GH 15.10.2021

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FRAME PROJECTS

Haringey Quality Review Panel

Report of Formal Review Meeting: High Road West

Wednesday 27 June 2018
Wood Green Works, 40 Cumberland Rd, London, N22 7SG

Panel

Peter Studdert
Dieter Kleiner
Esther Everett
Marie Burns
Paddy Pugh

Attendees

Martin Cowie	London Borough of Haringey
Dean Hermitage	London Borough of Haringey
Robbie McNaugher	London Borough of Haringey
Lucy Morrow	London Borough of Haringey
Molly Perman	London Borough of Haringey
Richard Truscott	London Borough of Haringey
Sarah Carmona	Frame Projects

Apologies / report copied to

Emma Williamson	London Borough of Haringey
Nora Begolli	London Borough of Haringey
John McRory	London Borough of Haringey
Ed Santry	London Borough of Haringey
Fred Raphael	London Borough of Haringey
Bruna Varante	London Borough of Haringey

Confidentiality

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1. Site address

High Road West, Tottenham, London N17

2. Presenting team

Lucas Lawrence	Studio Egret West
Allie Piehn	Studio Egret West
Sophie Thompson	LDA Design
Selina Mason	Lendlease
Tom Kirkham	Lendlease

3. Aims of the Quality Review Panel meeting

The Quality Review Panel provides impartial and objective advice from a diverse range of highly experienced practitioners. This report draws together the panel's advice, and is not intended to be a minute of the proceedings. It is intended that the panel's advice may assist the development management team in negotiating design improvements where appropriate and in addition may support decision-making by the Planning Committee, in order to secure the highest possible quality of development.

4. Planning authority's views

The High Road West site, approximately 11 ha, is located in the Northumberland Park ward in North Tottenham, between the Great Anglia railway line and the High Road and adjacent to Tottenham Hotspur Football Club. Policy SP1: Managing Growth identifies High Road West within the North Tottenham Growth Area. It requires development in Growth Areas to deliver new housing and business accommodation, maximise site opportunities, provide appropriate links to, and benefits for, surrounding areas and communities, and provide the necessary infrastructure, whilst also being in accordance with the full range of the Council's planning policies and objectives. The application site is allocated in the Tottenham Area Action Plan (TAAP) as NT5: High Road West, which highlights the need for a comprehensive new residential neighbourhood and a new leisure destination for London.

The Council's development partner, Lendlease, is preparing a masterplan to form the basis of a hybrid planning application: a detailed first phase for redevelopment of Whitehall Mews with the remainder in outline. Given the project's scale and complexity, a number of reviews are likely. This first review session seeks to highlight the key policy requirements and design principles and how these are informing evolution of the masterplan.

The panel's comments are sought on the emerging masterplan, and its response to key policy requirements and established design principles, including the indicative site layout and open space proposals (including public realm), in addition to the scale and massing of indicative development and its relationship to the surrounding area and existing heritage assets.

5. Quality Review Panel's views

Summary

The Quality Review Panel is grateful for the opportunity to comment on the proposals for High Road West at this early stage. It appreciates the level of creative thought that has gone into the emerging masterplan, but is unable to support it in its current form. The panel has fundamental concerns about including very tall buildings in this location, and believes that the increase in density from 1,400 homes to 2,500 homes is unrealistic. The applicant should return to a brief that more closely resembles the previously adopted masterplan. The panel would like to see a clear vision of the type of neighbourhoods that will be created at High Road West, which, whilst still delivering high densities, should be of a human scale and based principally on mansion blocks and terraced housing, with taller elements only located to the west of the site along the railway.

The panel has significant concerns about the quality of the two main public spaces being proposed in the master plan. Moselle Square is a particular challenge because of the need to cope with match day crowds as well as provide a local neighbourhood centre that feels safe both in the day and at night-time. The panel questions whether the 'backland' location of the square behind the High Road frontage is the best approach, and suggests that a more generous plaza that opened onto the High Road may provide a better setting for the stadium, as well as being positioned to give better 24 hour surveillance from the High Road. Peacock Park is a very different space as it is the only significant green space serving the new neighbourhood. Greater priority needs to be given to recreation and play here, and the scale of the buildings that define the park need to be of a human scale that minimise overshadowing and wind turbulence. The mixed-use eastern edge will need to be carefully designed to protect and enhance the residential amenities of the park. Further details on the panel's views are provided below.

Scope of the review

The panel understands that this initial review was intended as an introductory overview of the masterplan, and would welcome an opportunity for further review of the emerging scheme and its component parts in further detail as the proposals evolve. Due to time limitations, it was only able to comment at a strategic level, whilst some aspects of the scheme were not considered by the panel during the review. Areas not considered in detail on this occasion include: the southern edge of the masterplan area; the relationship to the Conservation Area at the south of the site; the yards and the High Road; and the detail of the public realm proposals.

The panel queried why a hybrid planning application is being proposed. Whitehall Mews is separated from the main site by the railway embankment, and the detailed application for the redevelopment of this site could be dealt with separately and more quickly if detached from the main application. More time could then be allowed to consider the highly complex outline planning application that would cover the main High Road West site. The panel would welcome clarification on this point.

Massing and development density

- The panel is opposed in principle to very tall buildings in this location. It would encourage an approach to heights and development density that is closer to the scale of the High Road West Masterplan Framework approved in December 2014.

- The panel considers that the masterplan should aim to deliver high density principally through mansion block and terraced housing typologies. Taller buildings may be appropriate along the western edge of the site fronting the railway, as proposed in the previously adopted master plan, and a marker building close to White Hart Lane station may also be appropriate if its local microclimatic impact can be contained and if it is of exceptionally high quality in design.

- The tall building on the north side of Peacock Park is particularly inappropriate given the role of the park as the only predominantly residential green space serving the new community. A tower in this location would harm the setting of the High Road Conservation Area, as well as overshadowing the primary school to the north.

- The current proposals represent almost a doubling of the residential development density compared with the previously adopted masterplan, and the panel considers this to be unrealistic.

- The panel considers that the towers that were permitted as part of the stadium redevelopment should not be taken as a precedent for this development as their context is quite different. They will be seen as integral to the large scale of the stadium, and their microclimatic impact will be mostly felt internally within the stadium complex, and not on the wider public realm.

- The panel considers that the current proposals seem comparable in scale / storey heights to recent (and forthcoming) developments at King's Cross and Tottenham Hale. However, it suggests that these locations are significantly different to High Road West in terms of their relationship to central London and the nature of their public transport connections: Kings Cross is a major rail and underground hub; Tottenham Hale is on the Victoria line and served by main line rail; whilst White Hart Lane is in a Zone 3 section of the overground network.

- The panel therefore departs fundamentally from many of the assumptions that underpin the approach to height and scale in the proposed masterplan. Instead it sees this development as an exciting opportunity to show how high densities can be delivered at a human scale without resorting to tower blocks.

Moselle Square

- The panel welcomes the commitment to making Moselle Square the heart of the new community, including the provision of generous community facilities. It questions, however, whether it will operate successfully in its proposed form and location.

- The panel accepts that Moselle Square presents a very difficult design challenge. It has to operate effectively on match days both as a gathering place for very large crowds and as part of the busy through route between the stadium and station. But for most of the time it will act as a local neighbourhood centre that needs to feel safe, active and well overlooked both in the daytime and at night.

- The panel wonders whether the proposed 'backland' location behind the High Road frontage is the best approach. It would be interested to see alternatives that, for instance, provided a more generous plaza that was open to the High Road, whilst at the same time giving a clear indication of the route from the stadium to the station. This might have the dual benefits of providing a better setting for the stadium as well as providing more natural surveillance from the High Road.

- The scale of the buildings that contain the square need to be appropriate to its size. A larger square can be fronted by taller buildings, and a view up to a taller building by the station may be an appropriate device to mark a key route. The scheme as presented seems to propose very tall buildings that would loom uncomfortably over the square, and if the size of the square is to remain as proposed, then the scale of the buildings that contain it will need to be reduced.

Peacock Park

- The panel suggests that the proposed community theatre building may be more appropriately located at Moselle Square (the civic space), close to other active frontages, rather than at the edge of Peacock Park (more a green residential amenity / park), which is away from key pedestrian routes.

- Peacock Park would be well suited to young people's activities (e.g. sport) in addition to play space for both older – and younger - children. The panel highlights the local demographic (38% of the immediate local population are under the age of 19), and suggests that provision within Peacock Park should respond much more to the needs of the children, young people and families who will be the residents of High Road West.

- The children's play area on site is currently located between two paths, and may potentially be perceived as being less secure than it could be. The panel would encourage the design team to explore adjusting the location of the play area, so that it is more protected.

- The panel notes that locating ‘yards’ and ‘maker spaces’ (which potentially bring noise and mess) along the east side of the only green space amenity within the development for children and young people may not be appropriate. This edge will need to be designed so that servicing and traffic generated by the yards is contained with them and doesn’t spill over into the residential area.

The yards

- The panel was unable to comment in detail on the proposed mixed-use yards behind the High Road frontage, but initial views are positive. This will be an exciting interface between the High Road and the residential neighbourhood to the west. It will be important, however, to be clear about what type of commercial activities are likely to succeed in this location. These may be much more ‘light industrial’ than ‘creative’ in character and may therefore require efficient servicing arrangements that can be contained within the yards. The relationship of workspaces to residential accommodation will have to be carefully considered.

High Road

- The High Road is one of the most important pieces of existing public realm in the immediate vicinity. It is undergoing significant change with the redevelopment of the stadium. The panel would therefore encourage the design team to focus additional energy on enhancing the High Road as a key part of the High Road West site.

- The panel would like to know more about how the qualities of the High Road will be retained and repaired. For example, how do new buildings fronting onto this main street, and taller buildings located behind, contribute to the High Street.

- The level of parking provision and the location and integration of parking spaces will have a critical impact upon the quality of High Road West as a place; the panel would like to know more information about the detail of these as the scheme evolves.

Next steps

The panel would be keen to see the design team take a step back and explore options for redeveloping the site that avoid reliance on towers to deliver high densities. A workshop approach may be appropriate as the next step in developing a dialogue around options for the site, but the main challenge in the first instance will be to define a more realistic brief that would enable a high quality, human scale development to emerge.

Appendix: Haringey Quality Charter

Policy DM1: Delivering High Quality Design

All new 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:

a) Relate positively to neighbouring structures, new or old, to create a harmonious whole;
b) Make a positive contribution to a place, improving the character and quality of an area;
c) Confidently address 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.

Design Standards

Character of development - development proposals should relate positively to their locality, having regard to:

a) Building heights;
b) Form, scale & massing prevailing around the site;
c) Urban grain, and the framework of routes and spaces connecting locally and more widely;
d) Maintaining a sense of enclosure and, where appropriate, following existing building lines;
e) Rhythm of any neighbouring or local regular plot and building widths;
f) Active, lively frontages to the public realm; and
g) Distinctive local architectural styles, detailing and materials.

Haringey Development Management DPD (2017)

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FRAME PROJECTS

Haringey Quality Review Panel

Report of Formal Review: High Road West

30 January 2019
The Grange, 32-34 White Hart Lane, London N17 8DP

Panel

Peter Studdert (chair)
Esther Kurland
Paddy Pugh
Tim Pitman
Marie Burns

Attendees

Martin Cowie	London Borough of Haringey
Robbie McNaugher	London Borough of Haringey
Lucy Morrow	London Borough of Haringey
Chris Smith	London Borough of Haringey
Tania Skelli	London Borough of Haringey
Richard Truscott	London Borough of Haringey
Christine Wood	London Borough of Haringey
Sarah Carmona	Frame Projects
Adela Paparisto	Frame Projects

Apologies / report copied to

Emma Williamson	London Borough of Haringey
Dean Hermitage	London Borough of Haringey
John McRory	London Borough of Haringey
Elisabetta Tonazzi	London Borough of Haringey
Fred Raphael	London Borough of Haringey

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1. Project name and site address

High Road West, Tottenham, London N17

2. Presenting team

Matthew Maple	London Borough of Haringey
Richard Fagg	Lendlease
Lucas Lawrence	Studio Egret West
Allie Piehn	Studio Egret West

3. Aims of the Quality Review Panel meeting

The Quality Review Panel provides impartial and objective advice from a diverse range of experienced practitioners. This report draws together the panel's advice, and is not intended to be a minute of the proceedings. It is intended that the panel's advice may assist the development management team in negotiating design improvements where appropriate and in addition may support decision-making by the Planning Committee, in order to secure the highest possible quality of development.

4. Planning authority's views

The High Road West site, approximately 11 ha, is located in the Northumberland Park ward in North Tottenham, between the Great Anglia railway line and the High Road and adjacent to Tottenham Hotspur Football Club. Policy SP1: Managing Growth identifies High Road West within the North Tottenham Growth Area. It requires development in Growth Areas to deliver new housing and business accommodation, maximise site opportunities, provide necessary infrastructure, links and benefits for local communities and surrounding areas. The application site is allocated in the Tottenham Area Action Plan (TAAP) as NT5: High Road West, which highlights the need for a comprehensive new residential neighbourhood and a new leisure destination for London. The TAAP was in part shaped by the High Road West Masterplan Framework prepared by Arup and approved in 2014. This document represents the most recent Council masterplan for the site, to be considered with the TAAC in setting the context for regeneration.

The Council's development partner, Lendlease, is preparing a masterplan to form the basis of a hybrid planning application: a detailed first phase for redevelopment of Whitehall Mews with the remainder in outline. A first review was held on 27 June 2018 which sought to highlight the key policy requirements and design principles and how these were informing evolution of the masterplan. A ballot is now required by the GLA for estate regeneration. Consequently, the panel's consideration of the evolving masterplan is sought: this includes a review of the principles; the development's approach to context, routes and connections; the approach to height and urban structure; the suitability of the masterplan for the ballot; and advice for next steps of the project.

5. Quality Review Panel's views

Summary

The Quality Review Panel welcomes the evolving masterplan, and considers that it is significantly improved. It recognises that there is an ambitious brief for the redevelopment, and that viability issues may present some difficult challenges as the scheme progresses.

The panel feels that many of the strategic design moves have been successful: shifting the massing westwards towards the railway, away from Peacock Park and Moselle Square; clarifying the residential nature of Peacock Park; and refining the layout of Moselle Square to create a more successful – and legible - route between the station and the stadium.

However, the panel still has significant concerns about the height and impact of the tallest tower fronting Moselle Square, and it is yet to be convinced about the liveability of the high-density residential blocks proposed throughout the development. The planning of these blocks appears to be based on single aspect flats with a central corridor. Greater detail on the design of these blocks will be necessary to establish whether the numbers of homes indicated can actually be delivered to an acceptable standard. The panel would also like to see the detail, layout and context of Moselle Square evolve further, in order to deliver a high-quality civic space.

Overall the panel believes that with some further reductions in scale and density, and with further refinements to their design, the evolving proposals hold much promise for the creation of high-quality residential neighbourhoods, community facilities, employment and town centre uses, and the panel looks forward to seeing it develop further. Further details are provided below.

Scope of the review

The panel understands that this review is intended to consider the overall masterplan at a strategic level, rather than the detail of the component parts. As a ballot is now required for GLA-funded estate redevelopment, the scope of the review will reflect the level of information required for the ballot.

This includes:

- design principles of the proposed estate regeneration
- estimated overall number of new homes
- future tenure mix
- proposed associated social infrastructure

It is anticipated that additional reviews will be scheduled following the ballot, in order for the panel to consider the evolving details of the proposals.

Moselle Square and the southern section of the masterplan

- As noted at the previous review, Moselle Square presents a very difficult design challenge. It has to operate effectively on match days both as a gathering place for very large crowds and as part of the busy through-route between the stadium and station. But for most of the time it will act as a local neighbourhood centre that needs to feel safe, active and well overlooked both in the daytime and at night.

- The panel feels that the revised configuration of Moselle Square is now much improved; the adjustments to building lines that frame the space will help to open up destination views through to the stadium and the station. It understands that there is a strong aspiration to strike a successful balance between achieving containment for the space, whilst also allowing substantial pedestrian flows on event/match days.

- However, the panel considers that there is potential for the square to open up to the High Road to an even greater extent in order to increase the opportunities for passive surveillance from the High Road, which could increase the safety – and perception of safety – of Moselle Square at night time.

- At a detailed level, it would also encourage the design team to ensure that the layout and landscape scheme for Moselle Square (including the nature, scale and configuration of the buildings around it) is driven - and underpinned - by a deep understanding of the potential microclimate that will be created in the different zones of the space.

- The potential movement flows and eddies, and areas of activity within the space will also inform the hard and soft landscape strategies.

- The panel would also welcome further clarification on the nature of the roads identified as passing through (or touching) the different zones of Moselle Square, especially in terms of how access is controlled or limited. Exploration of how these routes could be made part of the public space would be welcomed.

- Concern remains over the impact of the taller buildings to the south of the masterplan – towers are potentially unfriendly structures within an urban townscape due to overshadowing and wind turbulence issues.

- Moving the primary towers away from the public space will mitigate some of the negative microclimate issues within the square, and will also give the square a more comfortable ‘human’ scale, whilst avoiding tall buildings visually looming over the central area.

- The panel would also encourage further consideration of how the taller buildings could be designed, located, configured and modelled (in three dimensions) so as to minimise negative impacts on the public realm. How these tall structures meet the ground is also a critical aspect in ensuring high quality public realm. These issues are also relevant in the north of the masterplan.

- Of the cluster of tall buildings at the south of the site, the smaller two seem to be broadly of an acceptable scale (20 and 23 storeys). However, the panel is unable to support the scale of the third tower (35 storeys). This tower would benefit from a significant further reduction to its scale, as well as moving it back from Moselle Square so that it does not overshadow and over-dominate this important public space.

Peacock Park and the northern section of the masterplan

- The panel welcomes the approach taken to the northern section of the masterplan, and feels that the design team has done a good job of accommodating the challenging brief for this part of the site.

- It would welcome further clarity about the legibility of the site, especially in terms of the design response to the key views in and out of the different spaces, and the detail of important elevations. The panel would encourage the design team to establish what parts of the urban fabric are most legible and meaningful, and to integrate this with the land use and massing strategies. This issue is also relevant within the south of the masterplan.

- The panel supports the move to locate the community theatre building at Moselle Square, rather than at Peacock Park – which is more of a green residential amenity space.

- Shifting the bulk of the massing westwards towards the railway – and away from the residential amenity space at Peacock Park – is a positive move. Locating the 29 storey Peacock Park tower close to the railway line at the west of the site, and generally stepping down the massing of the buildings towards the High Road will help to reduce overshadowing and negative microclimate effects on Peacock Park, and will also reduce the visual impact on the conservation area.

- The panel would encourage the design team to explore adjusting vehicular access arrangements around Peacock Park, to potentially remove one of the roads bounding the green space, whilst retaining the other vehicular routes which will provide passive surveillance.

- The panel would like to know more about the arrangements for visitor parking within the residential district.

- The open space of the park itself needs to have a good balance between space for activities, in addition to space for passive enjoyment. Consideration of the 'footprint' in plan terms of the different activities envisaged for the park will help; territorial space around these footprints should provide a buffer zone between different usages.

- The existing group of plane trees at the northern end of the masterplan area are very important in townscape terms, and the panel would encourage the design team to adjust the layout of this section of the masterplan in order to retain all of them. It notes that this may require the removal of a smaller block on the corner.

Residential quality and liveability

- The panel considers that residential development at very high densities (as proposed across the High Road West masterplan) needs to be thoroughly interrogated at a very early stage in order to establish the quality of buildings and public realm that is achievable. Otherwise the risk remains that as the detailed design progresses, the massing and configuration may not be able to deliver an acceptable quality of accommodation.

- The panel feels that the configuration and plan-form of the proposed towers and mid-rise sections of the development should be explored at a greater detail at this early stage. At the moment they seem to rely heavily on single aspect flats with a central corridor, which is likely to be unacceptable across the whole development. It will not be possible to establish the overall capacity of the site until it can be clearly demonstrated that the proposed high-density blocks can deliver an acceptable quality of living accommodation, with good sunlight and daylight, in addition to generous amenity spaces, circulation areas, entrances and storage arrangements.

- Externally, the aim should be to create attractive and comfortable public realm with good levels of sunlight and daylight, and minimal turbulence.

The yards

- As mentioned at the previous review, the proposed mixed-use yards could be an exciting interface between the High Road and the residential neighbourhood to the west.

- It will be important, however, to be clear about what type of commercial activities are likely to succeed in this location, and how these will be curated and managed.

- The relationship of workspaces to residential accommodation will have to be carefully considered. The panel considers that the proposals for the yard are a potentially lovely idea, but need to be tested to make sure that they can actually be delivered.

- The panel suggests that it may not be necessary to allow for an additional north-south pedestrian route through the yards that line the eastern side of Peacock Park. It would encourage some further exploration of this section of the masterplan.

- It may be a better approach to focus pedestrian/cycle movement on the route adjacent to Peacock Park (or on the High Road), with access to each individual yard space as a spur off the main route.

High Road

- The High Road is one of the most important pieces of existing public realm in the immediate vicinity. It is undergoing significant change with the redevelopment of the stadium.

- The panel welcomes the aspiration at the heart of the proposals to retain and repair the High Road.

Next steps

- With some further reductions in scale and density, the panel believes that the evolving proposals hold much promise for the creation of high-quality residential neighbourhoods, community facilities, employment and town centre uses.

- The panel would welcome an opportunity to consider the evolving masterplan and its component parts in greater detail, as the scheme progresses.

Appendix: Haringey Development Management DPD

Policy DM1: Delivering high quality design

Haringey Development Charter

A All new 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:

a Relate positively to neighbouring structures, new or old, to create a harmonious whole;
b Make a positive contribution to a place, improving the character and quality of an area;
c Confidently address 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.

Design Standards

Character of development

B Development proposals should relate positively to their locality, having regard to:

a Building heights;
b Form, scale & massing prevailing around the site;
c Urban grain, and the framework of routes and spaces connecting locally and more widely;
d Maintaining a sense of enclosure and, where appropriate, following existing building lines;
e Rhythm of any neighbouring or local regular plot and building widths;
f Active, lively frontages to the public realm; and
g Distinctive local architectural styles, detailing and materials.

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FRAME PROJECTS

Haringey Quality Review Panel

Report of Formal Review Meeting: High Road West

Wednesday 28 April 2021
Video conference

Panel

Peter Studdert (chair)
Dieter Kleiner
Joanna Sutherland
Paddy Pugh
Lindsey Whitelaw

Attendees

Robbie McNaugher	London Borough of Haringey
Richard Truscott	London Borough of Haringey
Philip Elliot	London Borough of Haringey
Graham Harrington	London Borough of Haringey
Elisabetta Tonazzi	London Borough of Haringey
Sarah Carmona	Frame Projects
Kiki Ageridou	Frame Projects

Apologies / report copied to

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Dean Hermitage	London Borough of Haringey
Stéphane Pietrzak	London Borough of Haringey
Suzanne Kimman	London Borough of Haringey
Tim Starley-Grainger	London Borough of Haringey
Deborah Denner	Frame Projects

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1. Project name and site address

High Road West, Tottenham, London N17

2. Presenting team

Matthew Maple	London Borough of Haringey
Greg Greasley	Lendlease
Nick Bromell	Lendlease
Selena Mason	Lendlease
Avni Mehta	Lendlease
Lucas Lawrence	Studio Egret West
Alix Roberts	Studio Egret West
Nick James	Studio Egret West
Chris Goddard	DP9
Katharine Woods	DP9
Chris Hartley	DP9

3. Aims of the Quality Review Panel meeting

The Quality Review Panel provides impartial and objective advice from a diverse range of experienced practitioners. This report draws together the panel's advice and is not intended to be a minute of the proceedings. It is intended that the panel's advice may assist the development management team in negotiating design improvements where appropriate and in addition may support decision-making by the Planning Committee, in order to secure the highest possible quality of development.

4. Planning authority briefing

The High Road West site, approximately 11 Ha, is located in the Northumberland Park ward in North Tottenham, between the Great Anglia railway line and the High Road, and adjacent to Tottenham Hotspur Football Club. North Tottenham is a diverse neighbourhood with many different characteristics, land uses, urban structures, typologies, and a rich heritage. Parts of the site also fall within the North Tottenham Conservation Area which includes several Statutory and Locally Listed Buildings. Policy SP1: Managing Growth identifies High Road West within the North Tottenham Growth Area. It requires development in Growth Areas to deliver new housing and business accommodation, maximise site opportunities, provide necessary infrastructure, links and benefits for local communities and surrounding areas.

The application site is allocated in the Tottenham Area Action Plan (TAAP) as NT5: High Road West, which highlights the need for a comprehensive new residential neighbourhood and a new leisure destination for London. The Tottenham Area Action Plan was in part shaped by the High Road West Masterplan Framework prepared by Arup and approved by the Council's Cabinet in 2014. This document represents the latest Council 'masterplan' for the site and should be considered with the Tottenham

Area Action Plan in setting the context for regeneration in this location. The Council's development partner, Lendlease, is preparing a masterplan to form the basis of a hybrid planning application. Previous reviews were held in 2018 and 2019; since the scheme was last reviewed, the applicant team have secured grant funding from the Greater London Authority which makes the delivery of policy compliant levels of affordable housing more viable. The ballot required as part of the Greater London Authority funded estate regeneration process will take place in June 2021.

The panel's consideration of the evolving masterplan is sought. This includes a review of the vision, objectives, and masterplan principles; the development's approach to context, routes, and connections; the potential impact on heritage assets; the approach to height, massing, and urban structure; and advice on the next steps for the project.

5. Quality Review Panel's views

Summary

The Quality Review Panel welcomes the opportunity to re-visit the draft proposals and strategic approach for High Road West at an early stage. It considers that the project is clearly very challenging, with some significant constraints and factors, including the need to decant residents from the existing housing estate, crowd management on match days, the relationship to the station, the concentration of different activites and the impact on the Tottenham High Road Conservation Area. In this regard, High Road West represents one of the most complex current regeneration scheme in London.

The panel thinks that the review provided a very useful overview of the proposals, with exploration of the conceptual arrangements, for example block footprints, movement flows and character areas. While some of the strategic changes are positive and are moving the scheme in the right direction – especially the evolving design of Moselle Square and the new library and learning centre – the panel is not yet convinced by the proposals as a whole. The scale and density of the scheme remains highly ambitious and a lot more work is needed at a detailed level to test an appropriate development density and massing for the site from the point of view of residential quality and liveability. These tests should include: greater scrutiny of the detailed configuration and layout of individual blocks; the detail of servicing and circulation at ground floor level; the microclimate within the public realm and open spaces; daylight and general amenity of the accommodation internally; and impact on the Tottenham High Road Conservation and on the residential neighbourhood to the west of the railway. Further details on the panel's views are provided below.

Massing and development density

- The panel has concerns about a scheme of this scale and density in this location; the proposed scale and density of the master plan is similar to that

being built at more central locations such as Tottenham Hale, Stratford, and King's Cross, yet the public transport accessibility here is much poorer.

- It is important to ensure that the scheme is not being driven solely by the quantum of housing, without regard to the quality and liveability of the places created.

- There are a significant number of quite complex blocks within the masterplan; the panel is not convinced that this quantum can fit comfortably within the location and thinks that the development density may need to reduce to enable high quality residential environments, public realm, and open spaces.

- It would like to see testing of the blocks at a detailed level, to ensure that there is a high level of residential liveability, in terms of the configuration of the accommodation, floor plans, circulation, bin and cycle storage, orientation and daylight / sunlight levels. In addition, examination of the microclimate within the public realm and in key spaces will be critical.

- It will also be important to break the overall masterplan into smaller parcels of land and to consider these in detail, which should include sections through the site (and into adjacent areas), alongside the detailed tests outlined above.

- This will be especially important regarding the relationship to existing houses to the west of the railway. Moving the taller buildings within the masterplan towards the railway (and away from the High Road) is a sensible approach. However, the panel notes that this could result in a 'wall' of development alongside the railway, when viewed from the neighbouring streets to the west. It will be important to explore this relationship through site sections and view studies, and to mitigate negative impacts through design where possible.

- The panel would also like to know more about the mix of unit sizes, type, and tenure, and about the nature of the community that will be established at High Road West. It also questions whether a development comprised predominantly of apartments is appropriate.

Residential quality and liveability

- A key question (at a high development density) is how the ground floor is managed. This includes circulation, natural surveillance, servicing, bin stores, cycle stores and the nature of the building's frontage onto key parts of the public realm. These aspects all present huge challenges at higher densities; exploration of how these issues may be resolved will be crucial even at outline stage.

- It notes that the inclusion of a podium can potentially provide opportunities to successfully integrate many of these requirements and can also facilitate the provision of a central courtyard at first floor level.

- The panel highlights that configuring residential accommodation as double-loaded corridors of single aspect units does not typically result in high-quality, liveable development, especially at higher densities. Greater generosity within layouts and circulation spaces, alongside responsive and intelligent configuration of units can help to deliver dual aspect, high quality places to live, that will respond well to the microclimate.

- Block L1 in the northern half of the masterplan looks like a perimeter block with double-loaded corridors. The panel questions what the internal courtyard would be like and notes that at 6-8 storeys, a courtyard of these proportions may be acceptable, but at 10 to 26 storeys it would significantly compromise the quality of the accommodation orientated into the courtyard, especially at the lower floors.

- It also highlights blocks D1 and F1 as having very constrained ground floor footprints that would be unlikely to accommodate all of the functions necessary at entry level.

- Residential accommodation at ground floor level of tall buildings can present significant challenges in terms of privacy and amenity. The panel wonders whether inclusion of alternative uses at ground floor may be more appropriate, for example cultural or creative uses.

Placemaking and public realm

- The panel welcomes the scenario testing as part of the design development of Moselle Square. The adjustments to the design of the square are positive, including shifting roads, activating corners, and increasing the scale of the route. Locating the library at the entry to the square and reducing the scale of the building through the inclusion of landscaped terraces will help to provide visual links between the square and the High Road and should provide a level of activity and surveillance at quieter times. The library is potentially a very exciting project and could become an important visual route-marker.

- Inclusion of a drainable water feature is welcomed; it will allow for the movement of crowds on match days, and enhance the square at other times. However, the panel questions whether low-level planters (as shown in one of the sketches) will be robust enough to withstand the volume of pedestrians on match days; it would encourage further input from a specialist in managing crowd flows into stadiums.

- Love Lane is a key route within the masterplan. More information about its proposed nature and character – and how it will be distinctive from other parts of the masterplan and local area – would be welcomed.

- The panel questions how the masterplan can meet the London Plan requirements for open space and recreation areas, given that the development density has increased by approximately 75% since the 2014 masterplan. The nearest existing open space is a graveyard, which would not meet the requirements for children's play.

- It would also like to know more about the detailed proposals for Peacock Park. The panel considers that the aspirations for the green space may be optimistic in the light of possible constraining issues, for example access and servicing around the edges of the space. It notes that the park will have residential accommodation along one of the edges, while another edge comprises light industry / retail yards. Consideration of how this might inform the design and uses within the park would be welcomed.

- Exploration of the microclimate within Peacock Park would be supported. The panel is concerned that tall buildings adjacent to it would result in overshadowing, and create wind tunnel effects. Questions such as these need to be addressed as the scheme evolves.

- The panel understands that the intention is to design in flexibility of use for the yards but would support exploration of the opportunities for both the buildings and spaces. More detailed information on the yards would be welcomed, including proposals for servicing.

- It will be important for the design team to try to retain as many of the category A and B trees as possible. It notes that there are a lot of mature trees on the existing housing estate; it would be helpful to understand at a detailed level which trees will be retained, and which will have to be removed. T39 is a very attractive tree and it could be retained within the proposed square.

- The movement hierarchy of pedestrians and vehicles will inform the design and function of the public realm. It is important to see how servicing arrangements will also integrate with the proposed movement hierarchy.

- The panel questions the decision to include no parking within the masterplan, given that there is likely to be up to 10,000 residents living within the area. Consideration of the impact this might have on the local area on match days and non-match days will help to inform decisions about parking.

- While it would not be appropriate to provide large amounts of parking, it will be important to provide some parking, especially for the affordable housing. The panel would also like to know what provision is being made for disabled persons parking.

Heritage assets and relationship to Conservation Area

- The panel feels that the development should actively aim to enhance the adjacent Conservation Area.

- It understands that the proposal to locate the new library and learning centre adjacent to the High Road will benefit the design of Moselle Square. However, the site is an existing terrace of buildings identified as positive contributors to the Conservation Area, in addition to a listed building. If these are lost because of the development, discussion is needed concerning the compensating benefits that could be offered within the site and elsewhere in the conservation area.

Community involvement

- Community consultaion will be crucial in the development of this project, and the panel looks forward to hearing about the response from the forthcoming consultation programme at the next review.

Next steps

- The panel would welcome the opportunity to consider the evolving proposals in a series of further reviews prior to submission of the planning application.

- It would be useful to split the masterplan into two halves (southern and northern) and consider how each half works at a more detailed level, including block by block notional floor plans, play spaces, microclimate, edges, the relationship to the public realm and to the adjacent conservation area, the High Road, and the residential neighbourhoods to the west of the railway. As part of this process, it will be important to test the blocks in terms of servicing, bin and cycle storage and parking circulation.

- In-depth reviews of Peacock Park and the proposed library and learning centre would also be welcomed.

- An opportunity to revisit the overall masterplan, in addition to consideration of the parameter plans and design codes, would be very useful.

- It will be important to retain panel continuity for all future reviews where possible.

Appendix: Haringey Development Management DPD

Policy DM1: Delivering high quality design

Haringey Development Charter

A All new 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:

a Relate positively to neighbouring structures, new or old, to create a harmonious whole;
b Make a positive contribution to a place, improving the character and quality of an area;
c Confidently address 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.

Design Standards

Character of development

B Development proposals should relate positively to their locality, having regard to:

a Building heights;
b Form, scale & massing prevailing around the site;
c Urban grain, and the framework of routes and spaces connecting locally and more widely;
d Maintaining a sense of enclosure and, where appropriate, following existing building lines;
e Rhythm of any neighbouring or local regular plot and building widths;
f Active, lively frontages to the public realm; and
g Distinctive local architectural styles, detailing and materials.

CONFIDENTIAL

FRAME PROJECTS

Haringey Quality Review Panel

Report of Formal Review Meeting: High Road West

Wednesday 23 June 2021
Video conference

Panel

Peter Studdert (chair)
Dieter Kleiner
Joanna Sutherland
Paddy Pugh
Lindsey Whitelaw

Attendees

Robbie McNaugher	London Borough of Haringey
Richard Truscott	London Borough of Haringey
Philip Elliott	London Borough of Haringey
Graham Harrington	London Borough of Haringey
Elisabetta Tonazzi	London Borough of Haringey
Sarah Carmona	Frame Projects
Kiki Ageridou	Frame Projects
Zainab Malik	Frame Projects

Apologies / report copied to

Rob Krzyszowski	London Borough of Haringey
John McRory	London Borough of Haringey
Stéphane Pietrzak	London Borough of Haringey
Suzanne Kimman	London Borough of Haringey
Tim Starley-Grainger	London Borough of Haringey
Deborah Denner	Frame Projects

Confidentiality

This is a pre-application review, and therefore confidential. As a public organisation Haringey Council is subject to the Freedom of Information Act (FOI), and in the case of an FOI request may be obliged to release project information submitted for review.

1. Project name and site address

High Road West, Tottenham, London N17

2. Presenting team

Matthew Maple	London Borough of Haringey
Greg Greasley	Lendlease
Selena Mason	Lendlease
Avni Mehta	Lendlease
Sarah Brooks	Studio Egret West
Nick James	Studio Egret West
Lucas Lawrence	Studio Egret West
Martin Lee	Studio Egret West
Duncan Paybody	Studio Egret West
Tricia Patel	Pollard Thomas Edwards
Alina Toosey	Pollard Thomas Edwards
Simon Whitley	Pollard Thomas Edwards
Chris Hartley	DP9
Tom Horne	DP9
Katharine Woods	DP9

3. Aims of the Quality Review Panel meeting

The Quality Review Panel provides impartial and objective advice from a diverse range of experienced practitioners. This report draws together the panel's advice and is not intended to be a minute of the proceedings. It is intended that the panel's advice may assist the development management team in negotiating design improvements where appropriate and in addition may support decision-making by the Planning Committee, in order to secure the highest possible quality of development.

4. Planning authority briefing

The High Road West site, approximately 11 ha, is located in the Northumberland Park ward in North Tottenham, between the Great Anglia railway line and the High Road, and adjacent to Tottenham Hotspur Football Club. North Tottenham is a diverse neighbourhood with many different characteristics, land uses, urban structures, typologies, and a rich heritage. Parts of the wider masterplan site fall within the North Tottenham Conservation Area; and while Whitehall Mews, Plot F and Plot D are not within the conservation area, they are located adjacent to – or nearby – the conservation area, and are subject to Article 4 directions, governing alterations to facades in conservation areas. The area of masterplan to the south of White Hart Lane includes several locally listed buildings (in the location of the proposed library and learning centre), and sits adjacent to a statutory listed building, on White Hart Lane. Policy SP1: Managing Growth identifies High Road West within the North Tottenham Growth Area. It requires development in Growth Areas to deliver new housing and business accommodation, maximise site opportunities, provide

necessary infrastructure, links and benefits for local communities and surrounding areas.

The application site is allocated in the Tottenham Area Action Plan (TAAP) as NT5: High Road West, which highlights the need for a comprehensive new residential neighbourhood and a new leisure destination for London. The Tottenham Area Action Plan was in part shaped by the High Road West Masterplan Framework prepared by Arup and approved by the Council's Cabinet in 2014. This document represents the latest Council 'masterplan', for the site and should be considered with the Tottenham Area Action Plan in setting the context for regeneration in this location. The Council's development partner, Lendlease, is preparing a masterplan to form the basis of a hybrid planning application. Previous reviews were held in 2018, 2019 and 2021. The applicant team has secured grant funding from the Greater London Authority, which makes the delivery of policy compliant levels of affordable housing more viable; the ballot required as part of the Greater London Authority funded estate regeneration process has been pushed back to beyond June 2021.

The applicant team is planning to submit a hybrid application later in the year (subject to review) which will consist of a part outline, part full application for residential-led mixed use development consisting of up to 2,600 homes; new public park and civic square; a library and learning centre; new shops, civic and leisure spaces; and an energy centre. The panel's consideration of the evolving masterplan is sought. This includes a review of the vision, objectives, and masterplan principles; the development's approach to context, routes, and connections; the approach to sustainable, lifetime neighbourhoods; the potential impact on heritage assets; the approach to height, massing, and urban structure; and advice on the next steps for the project.

5. Quality Review Panel's views

Summary

The Quality Review Panel welcomes the opportunity to comment further on the draft proposals and strategic approach for High Road West as it continues to evolve. It thinks that the project is hugely ambitious and clearly very challenging, with some significant constraints, including the need to decant residents from the existing housing estate, crowd management on match days, the relationship to the station, the concentration of different activities and the impact on the Tottenham High Road Conservation Area. In this regard, High Road West represents one of the most complex current regeneration schemes in London. Moving forward, the panel feels that more detail of the proposals needs to be 'tied down' and, as part of this, additional time is needed to ensure that key buildings and spaces within the masterplan can be comprehensively reviewed by the panel. As design work continues and the project team moves to the next level of detail, it will be extremely important to focus on how the individual blocks and places created will work, for those that live there, work there or visit.

This review focused on the southern half of the master plan, south of White Hart Lane, in particular the detailed proposals for Whitehall Mews west of the railway embankment, and the emerging detail of Blocks D and F which are to be submitted in outline. Further reviews will be necessary to evaluate the emerging details of the remaining blocks and landscaping on the southern part of the site, as well as the totality of the northern half.

At a detailed level, the panel thinks that Whitehall Mews proposal promises high quality development. While the scale and massing of the proposals seem comfortable within the context, further consideration of some detailed aspects of the architectural expression; the landscape, play and public realm proposals; the design of the interface between the new buildings and the adjacent public realm; and solutions to mitigate noise and outlook issues for the block beside to the railway would be supported.

In terms of Plot F and Plot D, the diagrammatic plan-forms of the proposals represent good starting points, but further consideration – and reduction, where necessary – of the three-dimensional form, scale and massing of both Plot F and Plot D is required. This work should be informed by evaluation of the impact of the massing upon microclimate and sunlight / daylight penetration into key spaces and residential units; the impact upon townscape views locally and from further afield; and the impact upon the conservation area, and the setting of listed buildings, and how this may be off-set through a programme of enhancement within the conservation area. Further consideration of the podiums of both Plot F and Plot D should include strategic decisions about the design, functionality and character of the podium spaces; their relationship to the public realm and the entrance sequence; defensible spaces to protect residential amenity; and the visual expression of the podium as distinct from the buildings that contain it. Increasing the quantity and quality of private and communal amenity and play spaces within both Plot F and Plot D will also be necessary to ensure high quality, liveable development. Further details on the panel's views are provided below.

Scope of the review and application process

- This review focused on the southern half of the master plan. Due to time limitations within the review process it was not possible for the panel to consider the full range of issues concerning this part of the masterplan, the design of the public realm and the landscape proposals, and all of the individual sites in detail.

- The panel's comments were limited to a brief evaluation of Whitehall Mews, Plot F and Plot D. It would welcome the opportunity to also review the overall masterplan, landscape and public realm proposals, and all individual plots at a greater depth in future reviews.

- The aim for the outline elements of the application should be to have a clear view of the 'nuts and bolts' of the proposals, including impacts upon adjacent

conservation areas and the approach to – and detail of – the tall buildings. The panel understands that the outline parts of the application will comprise drawings, parameters plans, heights and a design code. It highlights that discussion on these outline parts at the current review should be at a strategic level, to establish whether this configuration of scale and mass provides a good basis for the subsequent reserved matters application.

- The panel was not able to review the proposals for the library at any depth during the review; however, it notes that it is yet to be convinced by the stepped terrace of trees at roof level of the proposed library. It considers that the new library should be designed at a detailed level, so that issues of design quality, area and facilities, in addition to the impact on the adjacent conservation area, can be 'tied down' and firmly established. The panel questions whether this can be achieved through an outline application. Establishing the details of the library proposal will also be extremely important in terms of the Section 106 provisions for the development.

- Further discussion regarding the conservation impact of the proposed demolition at the southern section of the masterplan is required, at a future review.

Approach to development and masterplan

- The panel welcomes the community consultation that is informing the emerging master plan. It would encourage the project team to take a fully integrated approach to the design, and in so doing identify local needs alongside opportunities to establish a legacy, perhaps in the form of ongoing community governance. It would like to see further work on the places within the scheme that will engender a real sense of ownership within the community.

- The panel would like to know more about the arboricultural survey of the overall masterplan; it highlights that there are some very attractive trees within the Love Lane Estate, and it would encourage the project team to retain as many of the mature trees as possible.

- It would also like to know more about the nature of the proposed commercial space within the different building plots, to ensure that the spaces provided are commercially viable for the long term, and will help to support a variety of commercial uses that will give the local area distinctiveness and character as a place to live, work and visit.

Whitehall Mews

- The panel found it difficult to comment in depth due to time constraints within the review. However, it feels that the design team has worked hard on the

proposals for Whitehall Mews, and that the scheme appears to promise high quality development.

- The predominant scale of the surrounding neighbourhood is two to three storeys; while introducing development at five to six storeys represents a step up from this datum, the panel feels reasonably comfortable with the scale and massing proposed in this location.

- Consideration of how to mitigate noise and outlook issues for the five to six storey block running adjacent to the railway will be very important.

- The panel supports the approach to architectural expression within the principal elevations. It considers that the gable ends are visually more austere, but this will be acceptable if the primary elevations have enough detail and articulation to offset them.

- It would encourage further consideration of the interface between the buildings and the public realm, where there are habitable rooms on the ground floor. Exploration of ways to mitigate these issues – through raising the floor level of the ground floor accommodation, or carefully designing defensible space and thresholds – would be supported.

- The panel likes the simplicity of the architectural expression of Whitehall Mews, and supports the choice of materials. The quality of materials and construction, for example the bricks specified, will be essential to the success of the completed scheme. It would support officers in securing this through planning conditions.

- While the panel understands that older residents within the existing housing estate may wish to retain the Tenterden shared garden as a quieter amenity space, it will be important to consider the scope and location of new play space as part of the scheme.

- An opportunity exists to draw the space bounded by the gable ends of the two blocks and the curve of the route under the railway into the site, and to include this area within the landscape proposals, to create additional communal space.

- The panel notes that a number of trees on site are very attractive, and it welcomes the ambition to retain as many as possible within the proposals.

Plot F

- As a plan-form diagram Plot F seems workable, comprising four buildings with spaces in between. The panel would like more information on the podium, and how it is perceived at street level in terms of the visual relationship between it and the four buildings that contain it. It thinks it would be beneficial to achieve

further clarity on how these four buildings read in three dimensions, as visually distinct from the podium. Ensuring that the primary buildings are seen as 'landing' on the ground, rather than on the podium, would be welcomed.

- The panel understands that the 'mansion blocks' (Plot F, Buildings B and D) are ten storeys from pavement level and eight storeys from podium level, which is a significant height. It notes that only a small part of the podium receives a minimum of two hours of sunlight, and that the larger part of the podium fails to receive even two hours of sunlight. The panel considers that if Buildings B and D are brought down in scale (Building D should be limited to no more than four storeys above podium level to maximise sunlight penetration), then this would significantly improve the quality of the podium space – and accommodation adjacent – in terms of daylight, sunlight and wind microclimate.

- The panel would also like to see the scale and massing of Plot F tested at a strategic level through townscape views, to enable evaluation of the impact of Buildings A and C (at 25 and 15 storeys respectively), in addition to Buildings B and D, before it can provide conclusive feedback on the scale of the overall plot development.

- Testing of the townscape impact of Plot F – and in particular within views from the conservation area to the north and east – will help to inform consideration of the development's strategic impact on the adjacent conservation area. The panel feels that further discussion is required on this important matter to establish the details of how the development will provide material enhancement to the conservation area in mitigation of these impacts, as required by the Tottenham Area Action Plan (TAAP).

- The panel would like to know more about the liveability aspects of Plot F, and the way it will function on a daily basis in terms of how people will access their homes, how they will meet neighbours, how deliveries will be accommodated and how visitors will navigate the development.

- It applauds the proportion of dual aspect units within the proposals for Plot F.

- It would encourage the project team to further explore the nature of the balconies – whether recessed or projecting – and their relationship to main streets. Projecting balconies at lower floors adjacent to main streets can create an uncomfortable relationship.

- Duplexes and triplexes (as in Building B) can work well at – and below – podium level; however, bedrooms looking out onto the podium space can be very problematic, so require very careful designing. One solution is to make the units oversized to enable location of living space looking out onto the central podium area.

- The panel would like to know more about the visual relationship between the lower-level maisonettes and the mansion blocks above (Building B), as this can be very difficult to resolve successfully.

- Given that there are a significant number of homes in a very constrained amount of space, the panel feels that provision of garden and podium space is not sufficient for the number of residents it will be serving. The scheme will require a large amount of play and amenity space, especially as the numbers of children will depend upon the height of the building. It would like to know how much doorstep play will be required within Plot F, and how this quantity will be accommodated.

- The panel is also not convinced by the quality of the play and amenity space. It notes that doorstep play provided on rooftops is problematic, whereas enabling residents to meet in an easily accessible and well-populated amenity space such as the podium courtyard would reinforce a sense of community.

- However, due to the three-dimensional volume of the podium space, it will lack a human scale and will potentially feel cavernous and unwelcoming. The three-dimensional design and landscape proposals for the podium space should be the focus of a separate design process that will inform the design of the buildings that contain the space, at a detailed level.

- The panel thinks that, at 6.5m above pavement level, the podium is very high, and risks feeling very divorced from the adjacent public realm. It understands the aspiration to create a visual and physical connection through steps up from the pavement, but has concerns that as the entrance to the podium at the top is gated, then this creates a conflict between a grand architectural gesture from street level that leads only to a private area. Further consideration of the access arrangements to the podium would be supported.

- The panel questions the location of refuse storage within the central podium space, and notes that if rubbish starts to pile up it will create significant problems. If retained in this location, it will require further thought and careful management strategies.

- Opportunities to ‘celebrate’ the cycle parking – by combining different cycle storage areas and moving the refuse storage from the podium – should be explored.

- The panel questions why there is no basement within such a substantial building, as basic plant and other elements could be located there. It notes that the current plant space does not seem sufficient to accommodate everything required.

Plot D

- The panel welcomes the ambition to create a slender profile on Building D-1, but feels that while the north and south elevations are elegantly proportioned, the east and west elevations present a visually solid bulk. It thinks that the upper setback to the roofline of Building D-1 is not significant enough, and it would encourage the project team to start the setback at a much lower level, to create a more elegant east and west profile.

- As with Plot F, testing of the townscape impact of the proposals for Plot D (with Building D-1 at 29-30 storeys) – and in particular within views from the conservation area to the north and east – will help to inform consideration of the development's strategic impact on the adjacent conservation area, and the overall acceptability of the proposed scale and massing of Plot D. The panel feels that further discussion is required on this important matter to establish in detail how the development will provide material enhancement to the conservation area in mitigation of these impacts, as required by the Tottenham Area Action Plan (TAAP).

- Building D-2 is lower in scale and has a different relationship to Moselle Square than Building D-1, which sits further to the west. The architectural expression of Buildings D-1 and D-2 feels very different; Building D-2 is expressed as visually solid, with brickwork elevations, while the tallest building, D-1, has a more lightweight expression with a visual 'exoskeleton'.

- The panel feels that these visual differences in expression of Buildings D-1 and D-2 should be articulated where the individual buildings 'land' at ground level, to enrich the experience of the public realm.

- As with Plot F, it would encourage the project team to further explore the nature of the balconies – whether recessed or projecting – and their relationship to main streets. Projecting balconies at lower floors adjacent to main streets can create an uncomfortable relationship. In addition, providing recessed balconies for taller blocks makes sense higher up the building.

- The proportion of active frontage within Plot F is welcomed; especially considering the pressure on space within the ground floor. The panel wonders whether provision of a basement could help to relieve pressure on the ground floor, and enable more flexibility and generosity in layout.

- It also questions whether the amount of amenity and play space is adequate for the residential numbers proposed. It notes that the scale of development is much higher than outlined within the TAAP, and suggests that there should be further discussion with officers about a realistic development density and amenity space provision. It notes that such decisions are very complex, and will need to take into account amenity, liveability, shadowing, sunlight / daylight and issues of quality.

- The podium could work quite well, but the panel would like to know more about the potential quality of the space, in terms of the relationships between building heights and configurations, and the way these will impact upon the microclimate of the space.

- Further work to ensure that the cycle storage is convenient and secure would be supported. It should be located as close to the entrance as possible, to ensure that people will use it. The panel notes that there are two storeys of cycle storage; if there was a basement within the development some cycle storage could be located there, which would enable a better connection with the street.

Next steps

- As design work continues, the panel would welcome the opportunity to review the overall masterplan and the individual plots at a greater level of detail – especially those that have not been considered yet. An opportunity to consider the parameter plans and design codes would also be very useful.

- Sufficient time should be allocated for further consideration of the southern half of the masterplan, including Plot D and Plot F, as they continue to evolve. It notes that a detailed discussion will also be required on the proposed library, and the overall public realm and landscape design, including Moselle Square.

- In terms of the northern section of the masterplan, the panel thinks that a full day will be required to enable adequate consideration of the proposals in the context of the existing permissions for some of the plots, the higher densities involved, and the proposals for the major open space of Peacock Park. It suggests that strategic content is covered in the morning, followed by detailed content in the afternoon.

- The panel notes that the dimensions of Peacock Park appear to have been reduced since the previous review, as the overall masterplan now shows the alternative proposals and existing permissions within the northern section of the masterplan. It highlights that, as design work continues on the overall masterplan and individual plots, there should be no reduction in the size of Peacock Park. The overall provision of useable green space within the development will be expected to meet Local Plan and London Plan standards.

- It will be important to retain panel continuity for future reviews, where possible.

Appendix: Haringey Development Management DPD

Policy DM1: Delivering high quality design

Haringey Development Charter

A All new 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:

a Relate positively to neighbouring structures, new or old, to create a harmonious whole;
b Make a positive contribution to a place, improving the character and quality of an area;
c Confidently address 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.

Design Standards

Character of development

B Development proposals should relate positively to their locality, having regard to:

a Building heights;
b Form, scale & massing prevailing around the site;
c Urban grain, and the framework of routes and spaces connecting locally and more widely;
d Maintaining a sense of enclosure and, where appropriate, following existing building lines;
e Rhythm of any neighbouring or local regular plot and building widths;
f Active, lively frontages to the public realm; and
g Distinctive local architectural styles, detailing and materials.

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Pre-Application Briefing to Committee – 17 March 2022

1. DETAILS OF THE DEVELOPMENT

Reference No: PPA/2020/0012 **Ward:** West Green

Address: Tangmere and Northolt blocks, Stapleford North block, Enterprise Centre, Medical Centre, former Moselle School and surrounding public realm areas, Broadwater Farm Estate, Tottenham, N17

Proposal: Redevelopment of part of the Broadwater Farm Estate including demolition of existing buildings and the erection of buildings of up to nine storeys in height to provide 294 new homes; improvements to the public realm; provision of replacement and new commercial and community space; new landscaping and play space; and provision of an Urban Design Framework for the wider Estate.

Applicant: London Borough of Haringey

Agent: Karakusevic Carson Architects

Ownership: Council

Case Officer Contact: Christopher Smith

2. BACKGROUND

2.1. The proposed development is being reported to the Planning Sub-Committee to enable members to view it ahead of the submission of a full planning application. Any comments made are of a provisional nature only and will not prejudice the final outcome of any formally submitted planning application.

2.2. It is anticipated that the planning application, once received, would be presented to the Planning Sub-Committee in September 2022. The applicant has engaged in pre-application discussions with Council Planning Officers and the Greater London Authority planning service over recent months.

3. SITE AND SURROUNDINGS

3.1. The Broadwater Farm Estate is a large residential estate consisting of twelve different blocks of up to 19 storeys and close to 1100 dwellings. It was first occupied in the 1970s. The area surrounding the Estate is predominantly residential consisting of terraced and semi-detached family housing. There is a school and community centre immediately to the north of the Estate and Lordship Recreation Ground is immediately to its west. Lordship Lane is a short walk to the north and the commercial area of Bruce Grove is to the east.

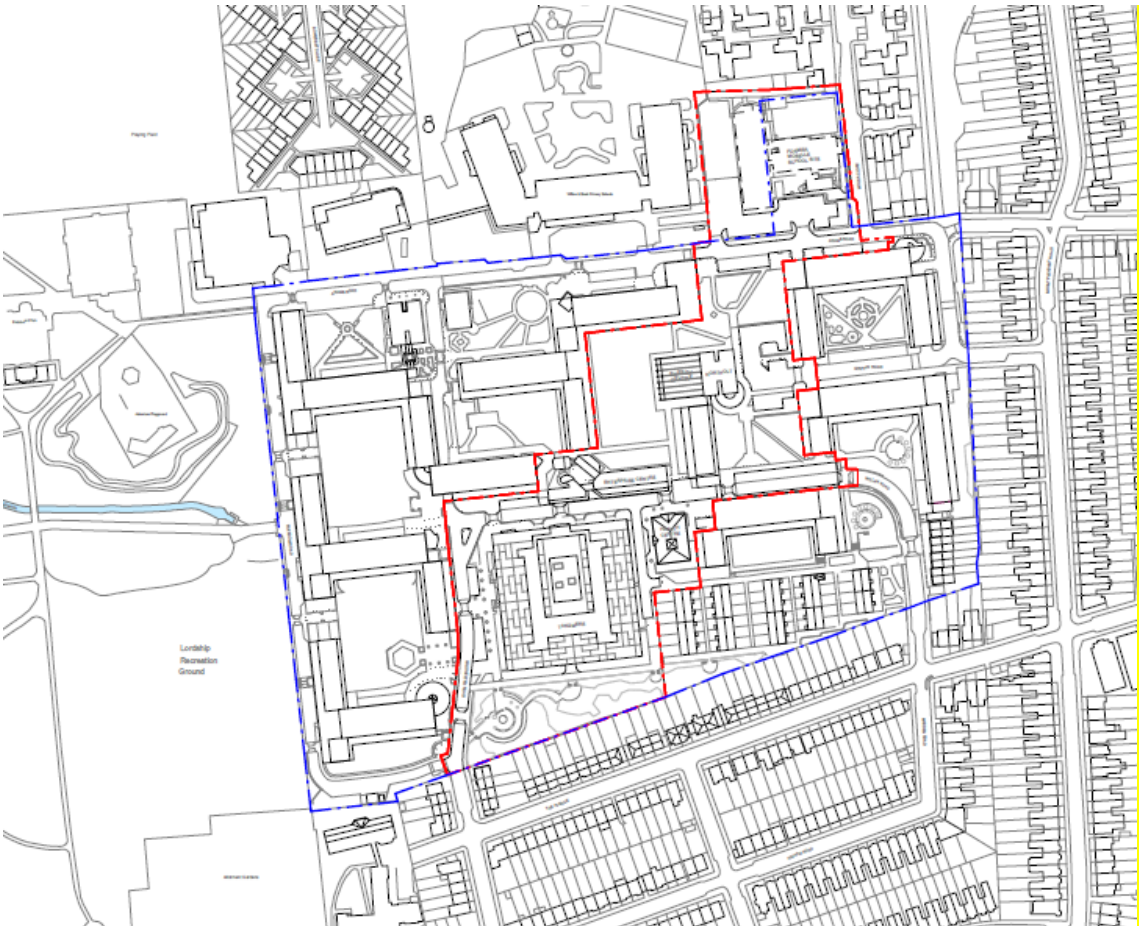


Image 1: Application site (red line) and applicant land ownership (blue line)

3.2. The Estate is located within the southern part of Site Allocation SA61 which has been identified for improvements to its housing stock, its design and routes through it. The site is also subject to the Blue Ribbon Network (the culverted Moselle Brook runs underneath the estate) and Flood Zone 2 (which affects the western end of the estate) policy designations.



Image 2: Site Allocation boundary (red line)

3.3. The adjacent Lordship Recreation Ground is Metropolitan Open Land and a Site of Importance for Nature Conservation. The Estate has a low PTAL rating of 1b-2.

3.4. The Estate is not located within a conservation area, nor does it contain any listed or locally listed buildings. The Tower Gardens and Peabody Cottages Conservation Areas are located a short walk to the north and the Bruce Castle/Bruce Grove Conservation Areas are nearby to the east. There are several listed and locally listed buildings within the Bruce Castle and Bruce Grove Conservation Areas, including the Grade I listed Bruce Castle.

3.5. The Tangmere and Northolt buildings have been found to have significant structural issues that cannot viably be addressed and therefore must be demolished. The demolition of these blocks is expected very soon. The nearby former Moselle School has already been demolished.

4. PROPOSED DEVELOPMENT

4.1. The proposed development is for the removal of several buildings on the site including Tangmere block, Northolt block, Stapleford North block, the Enterprise Centre and the Medical Centre (the former Moselle School has already been demolished) and provision of circa 294 dwellings in buildings up to nine storeys in height, provision of 1,282sqm of non-residential uses including the replacement

of the existing business and medical facilities and the provision of a retail unit and improvements to the public realm.

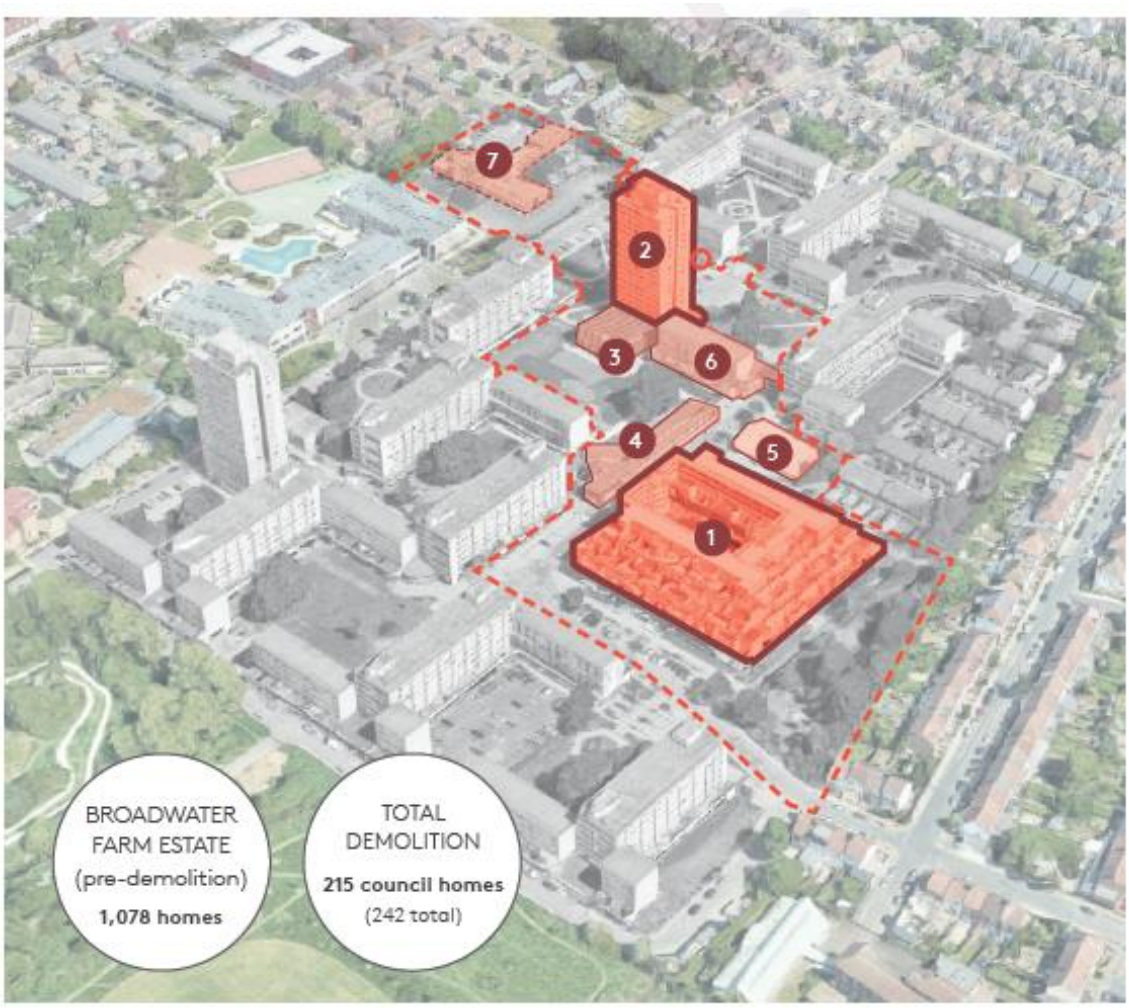


Image 3: Buildings for demolition

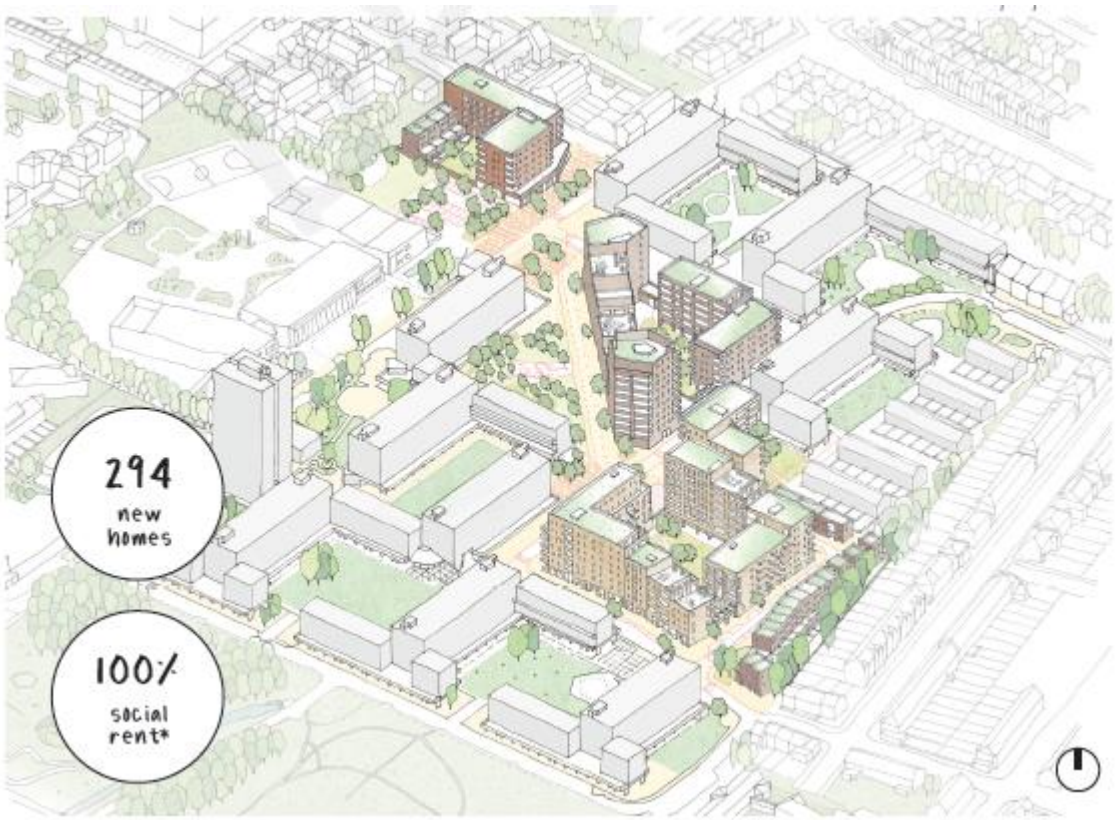


Image 4: Development proposals

4.2. All new residential properties provided within the development would be Council rented homes. 35% of the new homes would have three or more bedrooms. 10% of the homes would be wheelchair accessible. All dwellings would be dual aspect.

4.3. The development would create a new diagonal route through the centre of the site adjacent to a new public open space provided at its heart.

4.4. 91 car parking spaces would be provided within the application site, with secure cycle parking provided in communal stores and within individual flats.

4.5. To address the site allocation requirement to look at development comprehensively the proposal is supported by an Urban Design Framework for the wider Estate and relevant adjoining land parcels, which is intended to provide a guide for future development. The UDF will include a set of urban strategies and projects that, alongside this development proposal, create an overall development vision for the Estate.

5. PLANNING HISTORY

5.1. The Broadwater Farm Estate has an extensive planning history mostly relating to the ongoing management and upkeep of the Estate. There have been no recent

large-scale planning applications on the Estate. Prior approval for the demolition of some of the buildings within the site area have already been approved and are referenced below:

5.2. *Former Moselle School*

5.3. HGY/2021/1835. Prior notification: Demolition. Prior Approval Issued 23rd July 2021.

5.4. *Tangmere Block*

5.5. HGY/2021/0742. Prior notification for demolition of the existing 6- storey residential block (Tangmere). Prior Approval Not Required 1st April 2021.

6. CONSULTATIONS

6.1. Public Consultation

6.2. The applicant has undertaken its own public consultations in the form of a wide-ranging engagement programme with residents of the Estate over more than 18 months for this proposal. Comments received during these consultations have influenced the design of the final development.

6.3. A ballot of eligible residents on the estate was undertaken from 11 February to 7 March 2022 on the question “Do you support the redevelopment proposals within the Broadwater Farm Estate as set out in the Landlord Offer?”. The result was announced on 8 March 2022: on a turnout of 55% of eligible voters, 85% supported the proposal.

6.4. A Development Management Forum is scheduled for 16th March 2022.

6.5. Quality Review Panel

6.6. Earlier versions of the proposal have been assessed by the Quality Review Panel (QRP) on 20th January and 15th September 2021, and on 16th February 2022. The QRP’s report from the latest review is not yet available. This will be attached as an addendum to the Committee agenda. The QRP’s report from the September 2021 review is attached in **Appendix 1**.

6.7. The Panel supports the overall high-quality of the development including its scale, massing, layout and the provision of the diagonal route. The creation of a new street pattern within the estate is supported as are the public realm improvements and the provision of new and replacement non-residential uses. The architectural approach and use of contrasting brick materials is also supported.

6.8. The applicant is undertaking further design work to ensure that the detailed design of the buildings, their relationship with adjacent public spaces and landscaped areas, management of courtyards and the proposed relationship with the wider Urban Design Framework proposals are of a very high standard.

6.9. The submission of a full planning application is anticipated before the end of March 2022.

7. MATERIAL PLANNING CONSIDERATIONS

7.1. The Planning team's initial views on the development proposals are outlined below.

7.2. *Site Allocation Requirements*

7.3. Site Allocation SA61 of the Site Allocations DPD identifies the Broadwater Farm Estate for improvements to its housing stock, its design and routes through it.

7.4. The site allocation requires any development to be provided in accordance with a masterplan that has been prepared with the involvement of residents. The site allocation further requires that the optimum quantum of development is provided, affordable residential floorspace is replaced, and the development is of a high quality and in accordance with its surroundings, amongst other objectives.

7.5. Engagement with the local community has been ongoing for more than 18 months with the first public consultation event taking place in August 2020 and community design group meetings commencing in November 2020. Seven public consultation events and 13 design groups have taken place since the public engagement process commenced.

7.6. Policy H8 of the London Plan states that any existing housing lost should be replaced by new housing at existing or higher densities with at least the equivalent level of overall floorspace. It also states that social rent housing should be replaced with social rent housing that facilitates the right of return for existing residents.

7.7. The supporting text to Policy H8 states that all estate regeneration schemes should be delivered with existing and new residents and communities in mind and to achieve this aim should take into account the requirements of the Mayor's Good Practice Guide to Estate Regeneration, which includes the requirement for a ballot of residents (where funding from the Mayor of London is sought and where proposals involve demolition). In order to ensure compliance with best practice a ballot has been undertaken.

7.8. The proposed development would meet the site allocation requirements by providing a residential-led mixed-use development that would provide

replacement and additional residential accommodation with a high-quality design and layout. The development would also provide supporting non-residential facilities including a new well-being hub, replacement enterprise centre and new retail unit. New routes through the site would improve the quality, legibility and safety of the public realm as described in the sections below.

7.9. The application would be supported by an Urban Design Framework (UDF) that has been prepared in consultation with local residents. The UDF sets out how the development would comply with the requirements of the site allocation on an estate-wide basis, describes clear principles to guide future development of the wider Estate and ensures that the proposed development has been considered as part of a long-term holistic plan.

7.10. *Taller Buildings*

7.11. The London Plan Policy D9 states that buildings over six storeys in height should be considered tall buildings and also states that Councils should define what is considered a tall building within their Local Plan. The London Plan sets a range of visual, functional, environmental and cumulative impacts that must be taken into account when planning for a tall building.

7.12. The Council's Development Management DPD defines 'tall' buildings as those of ten storeys or greater. This development would not include any buildings above nine storeys in height. Policy DM6 of the Development Management DPD states that 'taller' buildings are those that would be two or three storeys higher than the prevailing building heights in the surrounding area, and also states that proposals for taller buildings must be justified in urban design terms, should be of a high standard of architectural quality and supported by high quality public realm and should preserve important local views.

7.13. The proposed buildings would range from three to nine storeys in height. The tallest parts of the development would be significantly lower in height than both the current Northolt block and the Kenley block, which is the tallest building on the Estate at 19 storeys.

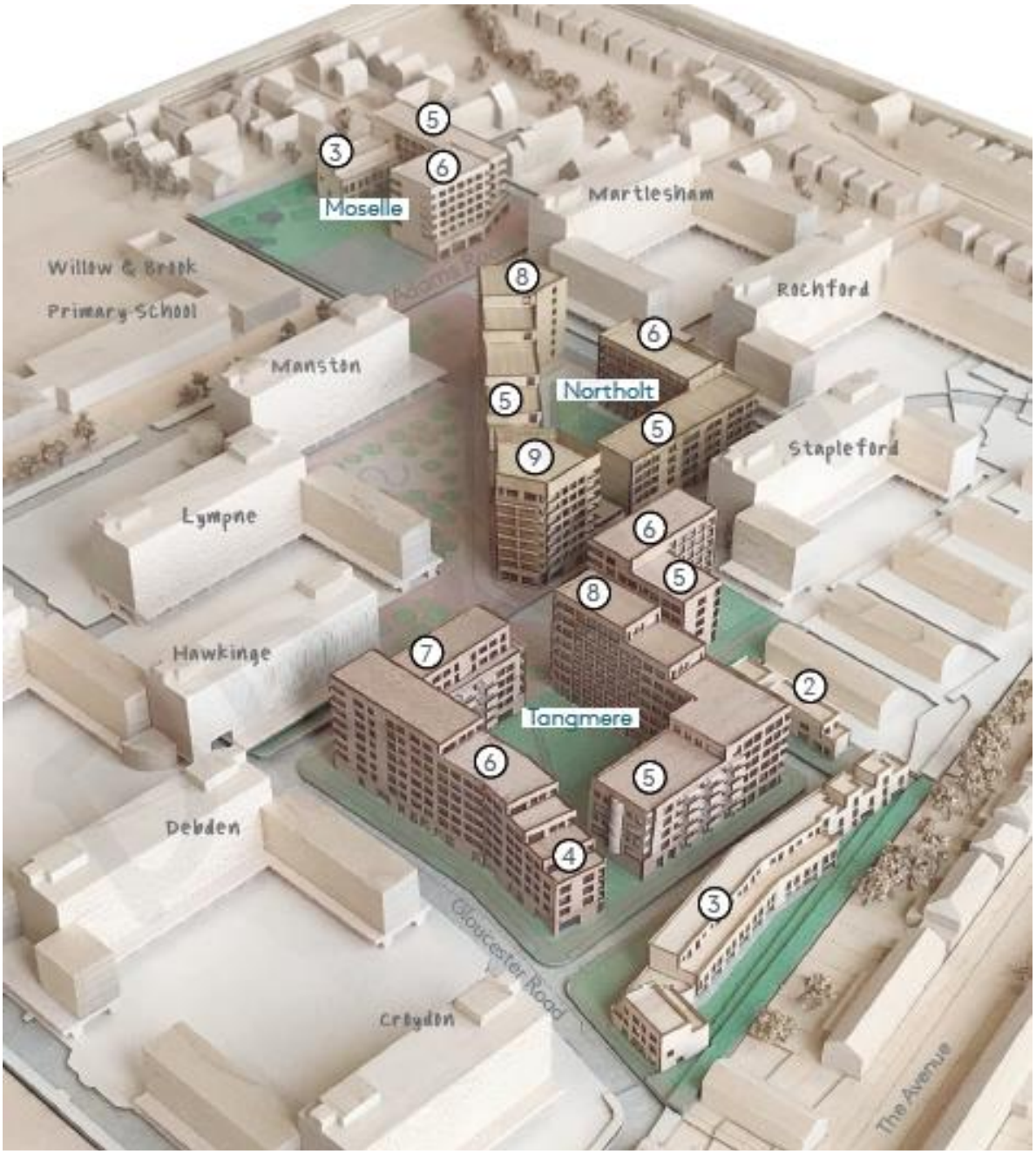


Image 5: Block heights

7.14. The tallest building proposed would be positioned in the centre of the site in place of the existing nineteen storey Northolt block and adjacent to the new public open space and civic square. The proposed storey heights throughout the new development are generally not significantly greater than adjacent existing buildings. Where new buildings are located close to existing residential properties outside of the Estate, they step down to reflect the neighbouring building heights of these. For example, this has been reflected in a significant stepping down of building heights towards the existing two storey houses on The Avenue or Moira Close.

7.15. The proposed buildings would be located within the designated Locally Significant View corridor no. 20. (Watermead Way to Alexandra Palace). The applicant has undertaken an analysis of this view and found that the significant height and scale of existing buildings on the Estate means that this protected view would not be significantly altered by the proposed development.

7.16. The applicant has also undertaken a wind and microclimate study to inform the design and it is expected that there would be a negligible impact on local street conditions from the proposed new buildings.

7.17. As such, the provision of tall (as per the London Plan) or taller (as per the Local Plan) buildings on this site is acceptable in urban design terms and therefore is supported in principle, subject to their final detailed design being of a high-quality and subject to further detailed analysis of their impact on residential amenity.

7.18. *Character, Appearance and Layout*

7.19. The buildings would be of an appropriate scale and massing and a high-quality contemporary design. They would be finished with a robust palette of brick materials and concrete that provides a visual connection to both the existing estate and surrounding residential neighbourhood.

7.20. The Estate was originally designed as an example of a new way of living following modern standards. However, the separation of pedestrians from the streets through the integration of raised decks proved to be unsuccessful. The streets within the Estate are currently dominated by on-street and undercroft car parking areas and there is an excessive number of potential routes through the estate. There is very little natural surveillance onto the streets of the estate due to the absence of residential units at ground floor. There is a low number of family homes (13%) on the Estate at present and as such many of the smaller units suffer from overcrowding.

7.21. The buildings would be laid out to create a legible street pattern for pedestrian movements and sizable public squares and to maximise the quality of the residential accommodation. All units would meet the internal space requirements of the Nationally Described Space Standards. There would be a low number of units per residential core, with communal block entrances clearly identified on the new streets. All units would be dual aspect. The new homes have been designed to be spacious, light and flexible which were key expectations established through engagement with residents on the Estate. Homes will be well-insulated to keep energy bills low.

7.22. Family homes would be provided throughout the site. These would mostly be located on lower floors of the proposed buildings with front doors onto the street where possible. All homes would have ample private amenity spaces in the form

of gardens, terraces or balconies with these supplemented by communal courtyards.

7.23. *Affordable Housing and Housing Mix*

7.24. All of the proposed residential units would be Council rented homes. 242 existing Council homes would be re-provided with an improved layout and residential quality with 52 additional new Council homes also being provided within the application site area. Eligible Broadwater Farm secure tenants will have priority access to these new homes.

7.25. 35% of the homes would have three or more bedrooms (14% of the total number of homes would have four or more bedrooms). This is a substantial increase on the proportion (13%) of family homes currently available on the wider Estate, which has resulted in many of the smaller existing units being overcrowded.

7.26. *Public Realm and Landscaping*

7.27. The UDF includes a range of urban strategies including those aimed at providing safe and healthy streets, inclusive and welcoming open spaces and active ground floors. It aims to develop a clear street hierarchy through the site, simplify and prioritise key pedestrian routes, and to create a greener local environment.

7.28. The development proposal would replace the existing undercroft parking areas with a new clear, safe and logical street pattern, with active frontages maximised and an improved environment for pedestrians provided in the form of wider pavements and street planting. There would be a new diagonal route through the centre of the site connecting the existing east-west routes on Willan Road and Adams Road. This new route would be supplemented by a new public open space in the centre of the site, which would have water features, play equipment and new planting. This open space would replace the existing Memorial Garden. The applicant has consulted residents of the Estate and the Metropolitan Police on this matter and the relocation of the Memorial Garden to the centre of the site is supported. At the northern and southern ends of the diagonal routes would be two new civic squares that would be enlivened with non-residential uses and planting.



Image 6: Proposed layout and greening

7.29. The buildings replacing Tangmere and Northolt blocks would have internal landscaped courtyards accessible to the public during the daytime with access closed off at night to ensure these spaces are adequately secure but retain the open character of the estate which engagement has identified as important to residents. This courtyard management arrangement is supported by the Metropolitan Police Designing Out Crime Officer.

7.30. The provision of several landscaped areas would ensure that there is no net loss of open space, a net increase in biodiversity, and an appropriate provision of play space that would complement the facilities nearby in Lordship Recreation Ground.

7.31. *River Moselle*

7.32. Policy DM28 of the Development Management DPD states that developments must protect, restore, open or enhance culverted watercourses as appropriate. The applicant has considered a range of options for de-culverting the Moselle Brook, which passes underneath the Estate, and found that it is not currently feasible for health and safety reasons, and because it would prejudice several other positive aspects of this development for relatively little visual amenity benefit. The Environment Agency has been consulted on the proposals to retain

the watercourse in its culvert and supports this design option. The Moselle Brook would instead be referenced in the public realm, including through the integration of water features, and alternative options for de-culverting are being considered as part of the long-term UDF proposals.

7.33. *Amenity of Nearby Residents*

7.34. The protection of the amenity of existing residents on the Estate has been a key consideration in the design of the development from an early stage. Existing residents have influenced the approach to building heights, scale and layout throughout the design process. As such, the smaller scale buildings would be located towards the site boundaries which would minimise the impact of the new development on existing residents on The Avenue, Moira Close and other adjacent streets.

7.35. Most windows around the new buildings would meet the BRE requirements for sunlight and daylight.

7.36. As such, no significant adverse impact on the amenity of existing residents is anticipated.

7.37. *Sustainability*

7.38. In accordance with the London Plan Policy SI2 all major development should be ‘zero carbon' by minimising operational emissions and energy demand in accordance with the Mayor of London’s energy hierarchy. The existing homes on the Estate are heated by a communal heating system. Centralised gas boilers within the energy centre circulate hot water around the estate through a network of pipes. The energy centre needs to be re-located to optimise the provision of new Council homes and to make space for the new diagonal route through the site.

7.39. The proposal would include air source heat pumps within a new energy centre to provide heating and hot water to the new development. This energy centre would connect to the existing Estate-wide energy system. The Council’s preferred long-term energy strategy is for the whole of the Estate to connect to a wider District Energy Network (DEN). The new energy centre will be designed to ensure this can be achieved in the future once the wider DEN is available.

7.40. *Transportation and Parking*

7.41. Site Allocation SA61 states that there is a need to improve the transport accessibility of the site including public transport, cycling/walking and alterations to the road network.

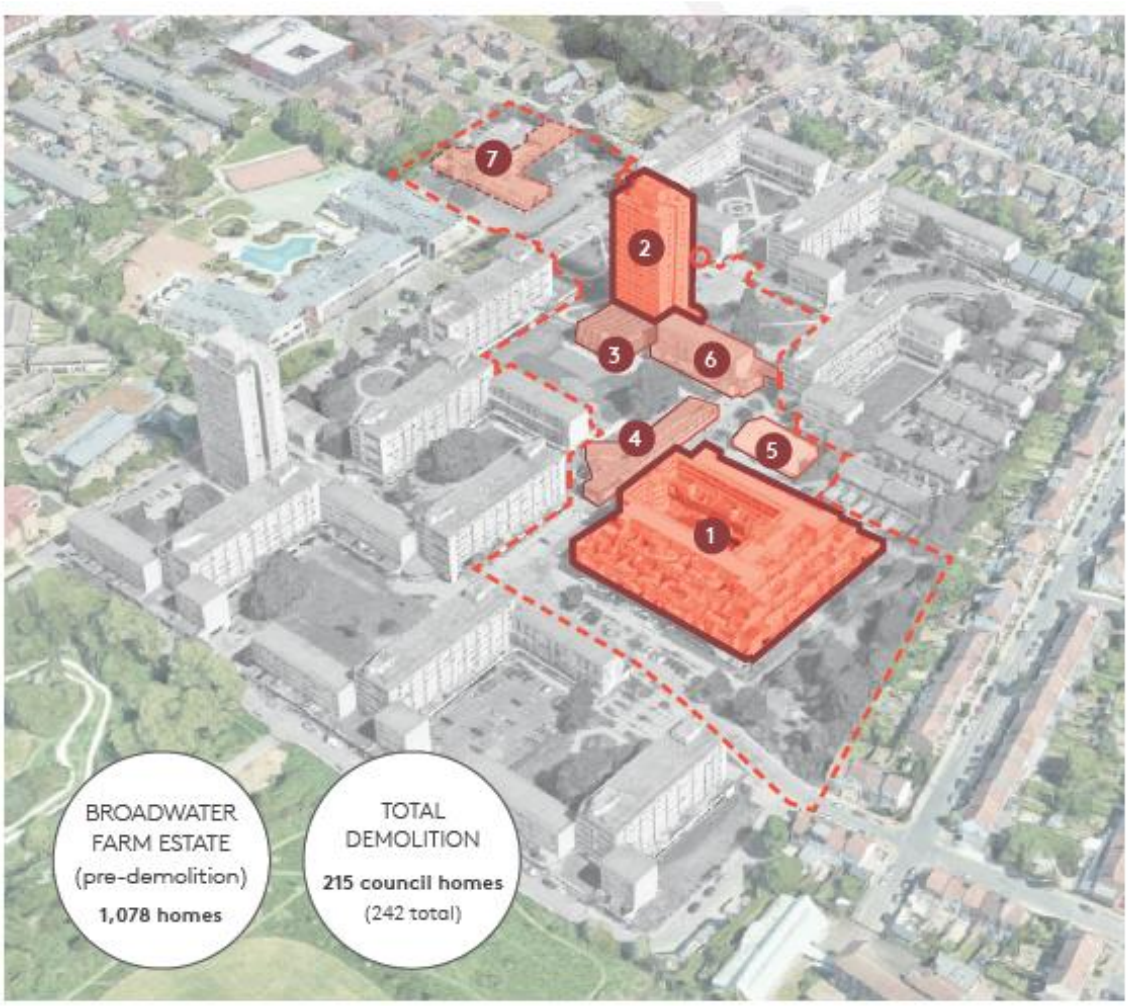
7.42. Although the Estate has a low PTAL rating of 1b-2, the W4 bus route does run through the southern part of the site and the local bus network can be accessed on Lordship Lane a short walk to the north.

7.43. Undercroft parking at the ground level of every building, in addition to large areas of on-street parking, has a significant detrimental impact on the quality of the public realm and the sense of security within the Estate. The parking within the site area has been rationalised to improve the quality of local streets and the general pedestrian experience on the Estate. A reduction in car parking within the boundaries of the application site is proposed. 91 car parking spaces would be provided within the site for the new development, which is a ratio of 0.3 per dwelling. This is below the current level of car ownership on the estate which has been estimated at 0.74 per dwelling. Parking spaces would be managed through the issuing of permits. Wheelchair-accessible parking would be available for 3% of dwellings.

7.44. High-quality cycle parking storage facilities, both within communal stores of a good size and layout and within individual residential properties (at the request of residents), would support the anticipated reduced car ownership levels within the proposed development. Improved accessibility for walking through the local Low Traffic Neighbourhood and connectivity to local cycle networks, including Cycle Superhighway 1, is also expected as part of the UDF proposals.

PLANS AND IMAGES

(1) Existing Site Plan and Buildings to be Removed from Site (in red)



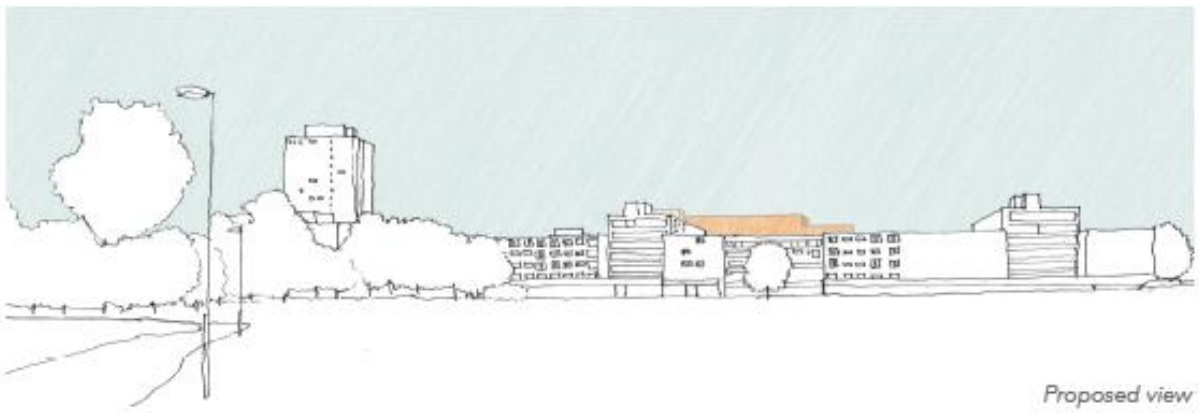
(2) Proposed Development Layout Plan



(3) Estate from Lordship Recreation Ground Before and After Development



Existing view



Proposed view

(4) View from South on Gloucester Road



(5) View from Within Courtyard of Replacement Tangmere Block



(6) View of Proposed Development from Willan Lane



(7) View of Proposed Development from Adams Road



APPENDIX 1

CONFIDENTIAL

FRAME PROJECTS

Haringey Quality Review Panel

Report of Formal Review Meeting: Broadwater Farm Estate

Wednesday 15 September 2021
Zoom video conference

Panel

Peter Studdert (chair)
Marie Burns
Leo Hammond
Tim Pitman
Wen Quek

Attendees

John McRory	London Borough of Haringey
Christopher Smith	London Borough of Haringey
Richard Truscott	London Borough of Haringey
Sarah Carmona	Frame Projects
Marina Stuart	Frame Projects

Apologies / report copied to

Rob Krzyszowski	London Borough of Haringey
Robbie McNaugher	London Borough of Haringey
Elisabetta Tonazzi	London Borough of Haringey
Deborah Denner	Frame Projects

Confidentiality

This is a pre-application review, and therefore confidential. As a public organisation Haringey Council is subject to the Freedom of Information Act (FOI), and in the case of an FOI request may be obliged to release project information submitted for review.

1. Project name and site address

Broadwater Farm Estate, Willan Road, Tottenham, London N17 6BF

2. Presenting team

Abigail Batchelor	Karakusevic Carson Architects
Karl Eriksson	Karakusevic Carson Architects
Niall Anderson	Karakusevic Carson Architects
Dann Jessen	EAST Architecture Landscape Urban Design Ltd
Daniel Barker	London Borough of Haringey
Sarah Lovell	London Borough of Haringey
Shelleyna Rahman	London Borough of Haringey
Shamiso Oneka	London Borough of Haringey

3. Aims of the Quality Review Panel meeting

The Quality Review Panel provides impartial and objective advice from a diverse range of experienced practitioners. This report draws together the panel's advice and is not intended to be a minute of the proceedings. It is intended that the panel's advice may assist the development management team in negotiating design improvements where appropriate and in addition may support decision-making by the Planning Committee, in order to secure the highest possible quality of development.

4. Planning authority briefing

The Broadwater Farm Estate is a large residential estate consisting of twelve different blocks of varying heights (maximum 19 storeys) and approximately 1100 dwellings. The area surrounding the estate is predominantly residential and comprises terraced and semi-detached family housing. There is a school and community centre immediately to the north of the estate and Lordship Recreation Ground is immediately to its west. Lordship Lane is a short walk to the north and the commercial area of Bruce Grove is further to the east. The estate forms the southern part of Site Allocation SA61, which is identified for improvements to its housing stock, routes through the area, and its overall design quality. It is also subject to the Blue Ribbon Network (the culverted Moselle Brook runs underneath the estate) and Flood Zone 2 (which affects the western end of the estate) policy designations.

Following the Grenfell disaster, surveys were undertaken on the estate which highlighted structural issues within two of these blocks – Tangmere and Northolt. Tangmere block is a seven storey 'ziggurat'-style building, while Northolt block is a 19-storey tower that adjoins the estate's energy centre. The proposal is to demolish the Tangmere and Northolt blocks, as well as the former Moselle School to the north of the site and replace them with contemporary development that meets the latest design and quality standards. This proposal is Phase 1 of a longer-term development strategy. Phase 1 is expected to provide up to 300 homes, improvements to the public realm, provision of new commercial and community space, landscaping and play space. The energy centre will be upgraded and relocated. A minimum of 30 per cent

family housing is proposed, and most dwellings are expected to be dual aspect. A new diagonal route, a park and an urban square would form part of the proposals. Refurbishment proposals for other blocks nearby are also expected to be submitted soon. An urban design framework is being developed for the estate. Officers seek the panel's views on building heights, residential and commercial layout, design detailing and materiality, in addition to proposals for car parking, landscaping and the river culvert.

5. Quality Review Panel's views

Summary

The Quality Review Panel welcomes the opportunity to review the proposals for the redevelopment at the Broadwater Farm Estate. It thanks the project team for the very comprehensive presentation, and was pleased to hear how the project has progressed. The panel thinks that the consultation with residents has been exemplary. The project is hugely important, both locally and nationally, and is perhaps overdue.

The panel offers warm support on the progress made so far, and feels that there are lots of good ideas that will help the development succeed. It welcomes the approach to scale, massing, and broad layout of the scheme, and thinks that the diagonal route could be very successful. As design work continues, some refinement could be made to the landscape proposals, to enhance wayfinding, views and passive recreation. The detailed three-dimensional form of the Tangmere site building could also be refined, and further development of the architectural expression of the buildings would be beneficial.

As the scheme progresses, several challenges will need to be addressed, which include achieving greater integration, creating active streets and enabling residents to assume 'ownership' of the courtyard spaces. Further details on the panel's views are provided below.

Approach to development and the urban design framework

- The panel understands that there are many challenges and issues facing the redevelopment of the Broadwater Farm Estate, but it notes that there are also some opportunities including the river, the recreation space, and the distinctiveness of the existing buildings.

- The urban design framework will be an important document. It would be helpful to collate the different layers of information into a single drawing, reinforcing the new routes across the site, and setting the scheme within that context.

- The panel would like to see more information on how the three work streams – the new build, the pilot project retrofit scheme and the bank of mini projects – will fit together.

- The bank of mini projects could be prioritised to reinforce the green link to the Lordship Recreation Ground, in addition to testing out and improving lighting solutions across the estate.

Massing and development density

- The panel supports the scale of the proposals and feels that keeping building heights up to a maximum of seven or eight storeys - with a single taller building at eight to ten storeys - is the correct approach and will give the development a much-needed human scale.

- At a detailed level, the panel would encourage some further refinement of the three-dimensional form of the Tangmere site building, to achieve a stronger – and less apologetic – visual reference to the existing Tangmere block.

Placemaking and landscape design

- The panel highlights opportunities for the buildings to reinforce the green link through the site, through the incorporation of hanging gardens or green roofs.

- A greater emphasis on a formal way-finding strategy throughout the site would be supported, as both the estate and the individual built forms are large.

- Street tree planting could also help to emphasise key routes and provide a contrast with the recreational spaces.

- The panel would like to see further consideration given to the way in which the buildings and landscape features frame and capture views through the estate, in terms of how a pedestrian would experience the new links and spaces. There may be opportunities to tighten up and reinforce views, and to manipulate the visual stops to enhance the experience of moving through the site.

- The panel applauds the landscape proposals and welcomes the good provision of play space. It would encourage further thought on open space for other types of residents, including older people or those without children, and more space for passive recreation would be welcomed.

- Community consultation has identified that residents would like to have accessible courtyard spaces to enable social interactions across the estate. Providing gated access to the Tangmere site could allow the courtyards to be freely accessible during the day and then closed at night, with fob access for residents if security becomes an issue.

- The panel feels that the new relationships that will be created within the estate between public and private space will start to change the feel and perception of the groundscape, as well as existing residents' attitudes towards the open spaces on site.

- There will be a loss of car parking, and the panel questions how the existing residents feel about this.

- The panel would like to know more about the arrangements for cycle routes and cycle parking within the proposals.

Scheme layout, access and architectural expression

- The panel feels that the general approach to the layout of the new blocks on site is convincing, and it welcomes the work done to establish order and clear distinctions between the 'front' and 'back' of the new development.

- The diagonal through-route has the potential to become an exciting promenade, if the mix and type of non-residential uses at ground floor are curated and managed well. Attracting a good supermarket would be of immense benefit to the scheme.

- The panel would welcome further exploration of the range of different uses that could also be introduced into the estate to give the area activity and vitality, both during the week and at weekends.

- The existing buildings form a concrete-dominated estate, surrounded by suburbs. Making sense of – and bridging the gap between – the system-built blocks and the warm brickwork of neighbouring terraces will be a real challenge. The use of contrasting brick tones could be beneficial in this.

- While the visualisations within the presentations look compelling, the panel thinks that some further refinement is needed to ensure that the architectural expression of the new blocks has depth, interest and distinctiveness. In particular, the architecture will need to be well detailed.

Design for inclusion, sustainability and healthy neighbourhoods

- Integrating the new community with the existing community will be a very important part of the project.

- The panel wonders whether introducing a mix of tenures within the scheme would help to improve the diversity of the development, while breaking down barriers with adjacent neighbours and reducing a perceived 'social island' effect.

Next steps

- The panel highlights a number of action points for consideration by the design team, in consultation with Haringey officers. It would be happy to consider the proposals at a further review, if required.
- It also offers a focused chair's review specifically on the approach to low carbon design and environmental sustainability.

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