

NOTICE OF MEETING

PLANNING SUB COMMITTEE

**Tuesday, 18th July, 2023, 7.00 pm - George Meehan House,
294 High Road, Wood Green, London, N22 8JZ (watch the live
meeting [here](#), watch the recording [here](#))**

Members: Councillors Barbara Blake (Chair), Reg Rice (Vice-Chair), Nicola Bartlett, John Bevan, Cathy Brennan, George Dunstall, Scott Emery, Emine Ibrahim, Sue Jameson, Sean O'Donovan and Alexandra Worrell

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 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. MINUTES

To confirm and sign the minutes of the Planning Sub Committee held on 11 May 2023, 5 June 2023 and 3 July 2023 as a correct record.

To follow

7. 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.

8. HGY/2022/2116 - HORNSEY POLICE STATION, 98 TOTTENHAM LANE, N8 7EJ (PAGES 1 - 180)

Proposal: Retention of existing Police Station building (Block A) with internal refurbishment, rear extensions and loft conversions to create 6 terrace houses and 4 flats. Erection of two buildings comprising of Block C along Glebe Road and Harold Road to create 8 flats and erection of Block B along Tottenham Lane and towards the rear of Tottenham Lane to create 7 flats and 4 mews houses including landscaping and other associated works.

Recommendation: GRANT

9. HGY/2022/0563 - THE GOODS YARD AND THE DEPOT - 36 & 44-52 WHITE HART LANE (AND LAND TO THE REAR) AND 867-869 HIGH ROAD (AND LAND TO THE REAR), N17 8EY (PAGES 181 - 590)

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

Recommendation: GRANT

10. NEW ITEMS OF URGENT BUSINESS

11. DATE OF NEXT MEETING

To note the date of the next meeting as 11 September 2023.

Felicity Foley, Committees Manager
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Fiona Alderman
Head of Legal & Governance (Monitoring Officer)
George Meehan House, 294 High Road, Wood Green, N22 8JZ

Monday, 10 July 2023

Planning Sub Committee

Item No.

REPORT FOR CONSIDERATION AT PLANNING SUB-COMMITTEE**1. APPLICATION DETAILS****Reference No:** HGY/2022/2116**Ward:** Hornsey**Address:** Hornsey Police Station, 98, Tottenham Lane, London, N8 7EJ

Proposal: Retention of existing Police Station building (Block A) with internal refurbishment, rear extensions and loft conversions to create 6 terrace houses and 4 flats. Erection of two buildings comprising of Block C along Glebe Road and Harold Road to create 8 flats and erection of Block B along Tottenham Lane and towards the rear of Tottenham Lane to create 7 flats and 4 mews houses including landscaping and other associated works

Applicant: Mr Kuan Leng**Ownership:** Private**Case Officer Contact:** Valerie Okeiyi

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

1.2 SUMMARY OF KEY REASONS FOR RECOMMENDATION

- The loss of a community facility in the form of a Police Station is acceptable as it forms part of a wider strategic Metropolitan Police Service programme to dispose of existing Police Stations whilst not impacting on police services that are required to meet the needs of the local population
- The development would bring back into use a redundant site a high-quality residential development which responds appropriately to the local context and is supported by the Quality Review Panel
- The development would provide a total of 29 residential dwellings, contributing towards much needed housing stock in the borough.
- The development would provide 19.4% on-site affordable housing by habitable room in the form of 8 flats for London Affordable Rent, which is the main low cost affordable rented housing within block C.
- The proposed development will lead to a very low, less than substantial harm to the significance of the conservation area and its assets that is outweighed by the several significant public benefits of the development. The remainder of the scheme is considered to preserve the character and appearance of the conservation area.

- The size, mix, tenure, and quality of accommodation are acceptable and either meet or exceed relevant planning policy standards. The majority of the dwellings have private external amenity space and all dwellings have access onto a generous communal amenity space.
- The proposal provides good quality hard and soft landscaping.
- The proposal has been designed to avoid any material harm to neighbouring amenity in terms of a loss of sunlight and daylight, outlook, or privacy, and in terms of excessive, noise, light or air pollution.
- The development would be 'car free' and provide an appropriate quantity of cycle parking spaces for this location and would be further supported by sustainable transport initiatives. There would be no significant adverse impacts on the surrounding highway network or on car parking conditions in the area.
- The development would provide appropriate carbon reduction measures and a carbon off-setting payment to provide a zero carbon development, as well as site drainage and biodiversity improvements.
- The proposed development will secure several obligations including financial contributions to mitigate the residual impacts of the development.

2. RECOMMENDATION

- 2.1 That the Committee resolve to GRANT planning permission and that the Head of Development Management or the Assistant Director of Planning, Building Standards & Sustainability is authorised to issue the planning permission and impose conditions and informatives subject to an agreement providing for the measures set out in the Heads of Terms below.
- 2.2 That delegated authority be granted to the Head of Development Management or the Assistant Director Planning, Building Standards and Sustainability to make any alterations, additions or deletions to the recommended measures and/or recommended conditions as set out in this report and to further delegate this power provided this authority shall be exercised in consultation with the Chair (or in their absence the Vice-Chair) of the Sub-Committee.
- 2.3 That the agreement referred to in resolution (2.1) above is to be completed no later than 10/08/2023 within such extended time as the Head of Development Management or the Assistant Director Planning, Building Standards & Sustainability shall in his sole discretion allow; and
- 2.4 That, following completion of the agreement(s) referred to in resolution (2.1) within the time period provided for in resolution (2.3) above, planning permission be granted in accordance with the Planning Application subject to the attachment of the conditions.

Summary Lists of Conditions, Informatives and Heads of Terms

Conditions

1. Three years
2. Drawings
3. Materials
4. Boundary treatment and access control
5. Landscaping
6. Lighting
7. Site levels
8. Secure by design accreditation
9. Secure by design certification
10. Unexpected Contamination
11. NRMM
12. Demolition/Construction Environmental Management Plan
13. Land Contamination
14. Cycle parking
15. Mobility Scooter
16. Delivery and Servicing Plan
17. Piling Method Statement
18. Strategic Water Main
19. Satellite antenna
20. Restriction to telecommunications apparatus
21. Architect retention
22. Wheelchair accessible dwellings
23. Noise Management Plan
24. Energy Strategy
25. Retrofit
26. Energy Monitoring
27. Overheating
28. Building User Guide
29. Living Roofs and Walls
30. Biodiversity Measures
31. Water Butts

Informatives

- 1) Co-operation
- 2) CIL liable
- 3) Hours of construction
- 4) Party Wall Act
- 5) Street Numbering
- 6) Sprinklers
- 7) Water pressure
- 8) Thames Water Groundwater Risk Management Permit
- 9) Thames Water Underground Asset
- 10) Asbestos

- 11) Secure by design
- 12) Tottenham Lane bus routes
- 13) Construction Contractors

Section 106 Heads of Terms:

1. Affordable housing provision
 - Eight (8) flats for London Affordable Rent
 - Early and late stage viability review
2. Section 278 Highway Agreement
 - Reinstatement of the redundant crossover on Harold Road, resurfacing of the footway to the perimeter of the site to ensure a high quality footway, and changes to the on street waiting and loading restrictions as proposed.
3. Sustainable Transport Initiatives
 - £4,000 (four thousand pounds) towards the amendment of the Traffic Management Order- to exclude residents from seeking parking permits
 - Car Club – Five years free membership for all residents and a credit of £100 per year/per unit for the first two years.
 - £10,000 towards a Construction Logistics and Management Plan, which should be submitted 6 months (six months) prior to the commencement of development
 - Residential Travel Plan should be submitted within 6 months (six months) of first occupation - Monitoring of the travel plan initiatives £3,000 (three thousand pounds) for five years £15,000 (fifteen thousand pounds) in total
 - £100,000 towards sustainable and active travel
4. Carbon Mitigation
 - Energy Plan
 - Sustainability Review
 - Be Seen commitment to uploading energy data
 - Estimated carbon offset contribution (and associated obligations) of £29,355 (calculation based on £2,850 per tonne of carbon emissions), plus a 10% management fee;
5. Employment Initiative – participation and financial contribution towards Local Training and Employment Plan
 - Provision of a named Employment Initiatives Co-Ordinator;
 - Notify the Council of any on-site vacancies;

- 20% of the on-site workforce to be Haringey residents;
- 5% of the on-site workforce to be Haringey resident trainees;
- Provide apprenticeships at one per £3m development cost (max. 10% of total staff);
- Provide a support fee of £1,500 per apprenticeship towards recruitment costs.

6. Monitoring Contribution

- 5% of total value of contributions (not including monitoring);
- £500 per non-financial contribution;
- Total monitoring contribution to not exceed £50,000

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

2.6 In the absence of the agreement referred to in resolution (2.1) above not being completed within the time period provided for in resolution (2.3) above, the planning permission be refused for the following reasons:

1. The proposed development, in the absence of a legal agreement failing to secure the provision of on-site affordable housing and meet the housing aspirations of Haringey's residents. As such, the proposals would be contrary to London Plan Policies H4 and H5, Strategic Policy SP2, and DM DPD Policies DM 11 and DM 13.
2. The proposed development, in the absence of a legal agreement securing 1) Section 278 Highway Agreement for the reinstatement of the redundant crossover on Harold Road, resurfacing of the footway to the perimeter of the site to ensure a high quality footway, and changes to the on street waiting and loading restrictions as proposed 2) A contribution towards amendment of the local Traffic Management Order 3) Five years free car club membership and a credit of £100 per year/per unit for the first two years. 4) A contribution towards a Construction Logistics and Management Plan, 5) A contribution towards sustainable and active travel 6) Implementation of a residential travel plan and monitoring fee would have an unacceptable impact on the safe operation of the highway network and give rise to overspill parking impacts and unsustainable modes of travel. As such, the proposal is contrary to London Plan policies T1, Development Management DPD Policies DM31, DM32 and DM48
3. The proposed development, in the absence of a legal agreement to work with the Council's Employment and Skills team and to provide other employment initiatives would fail to support local employment, regeneration and address local unemployment by facilitating training opportunities for the local population. As such, the proposal is contrary to Policy SP9 of Haringey's Local Plan 2017.

4. The proposed development, in the absence of a legal agreement securing sufficient energy efficiency measures and financial contribution towards carbon offsetting, would result in an unacceptable level of carbon dioxide emissions. As such, the proposal would be contrary to Policies SI 2 of the London Plan 2021, Local Plan 2017 Policy SP4 and Policy DM21 of the Development Management Development Plan Document 2017.
- 2.7 In the event that the Planning Application is refused for the reasons set out in resolution (2.6) above, the Head of Development Management (in consultation with the Chair of Planning Sub-Committee) is hereby authorised to approve any further application for planning permission which duplicates the Planning Application provided that:
- (i) There has not been any material change in circumstances in the relevant planning considerations, and
 - (ii) The further application for planning permission is submitted to and approved by the Assistant Director within a period of not more than 12 months from the date of the said refusal, and
 - (iii) The relevant parties shall have previously entered into the agreement contemplated in resolution (1) above to secure the obligations specified therein.

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8. RECOMMENDATION/PLANNING CONDITIONS & INFORMATIVES

APPENDICES:

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| Appendix 2 | Plans and Images |
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| Appendix 4 | QRP Reports |
| Appendix 5 | Development Forum minutes |
| Appendix 6 | Pre-application Committee minutes |
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3.0 PROPOSED DEVELOPMENT AND SITE LOCATION DETAILS

3.1 Proposed development

- 3.1.1. This is a planning application for the conversion of the existing Police Station (Block A) to residential units and the redevelopment of land around it (Blocks B and C) to create 29 flats/houses in total.
- 3.1.2. Block A (the existing but redundant Police Station), located along Tottenham Lane and Harold Road will include internal refurbishment, rear extensions and loft conversions and would comprise of 6 houses and 4 flats. Block B (new build), located along Tottenham Lane would be 3 to 4 storeys in height and comprise of 7 flats and 4 mews houses. Block C (new build), located along Glebe Road and Harold Road will be 3 storeys in height and comprise of 8 flats.
- 3.1.3. The proposal would include 6 one-bedroom units (20%), 11 x two-bedroom units (39.9%), 8 x three-bedroom units (27.8%) and 4 x four-bedroom units (13.6%). Three of the new dwellings would be wheelchair-accessible located within block B.
- 3.3.4 The proposed scheme would be 'car-free' whilst providing 10% on-street blue badge parking, with residents/occupiers applying for a designated on street blue badge bay. Three mobility scooter storage and charging bays are proposed within the new Mews Lane. A communal cycle parking storage facility is provided in blocks A, B and C to serve the residential flats and the houses in Block A will accommodate a cycle storage unit, whilst each of the mews houses of block B will have an internal dedicated cycle storage area. Overall 68 long stay and 4 short stay cycle parking spaces are proposed.
- 3.3.5 The development would include a delivery/loading bay that would replace the existing redundant 'Police' bay in Church Lane. The converted houses of Block A and flats of Block C will share a refuse store in between both Blocks. The residential flats of Block A will have a separate refuse store on the corner of Harold Road and Tottenham Lane and the mews houses in Block B will share a refuse store with the flats of Block B.
- 3.3.6 Soft and hard landscaping is proposed around the boundaries of the site, within the central communal garden, private gardens, on all the flat roofs and the wall on the boundary of the new Mews Lane. The landscaping would comprise of new tree planting, low level planters, shrubs, a bio-diverse roof, wall climbers and permeable paving.
- 3.3.7 The retained existing former Police Station building (Block A) will include alterations to the exterior fabric of the existing building such as brickwork repair where needed and refurbishment of the existing windows and timber panelled doors and a new re-instated slate roof. The new extension to the rear of the

existing building of Block A will be finished in red brick and include aluminium window/door frames and zinc clad dormers. Block B which includes the mews houses will be contemporary in style and finished in red brick to match Block A and the windows/doors will have an aluminium finish. Block C will be contemporary in style and finished in brickwork to match Block A and include a slate roof with aluminium window/door frames and zinc clad dormers.

3.3.8 The planning application has been amended since initial submission and includes the following changes:

- Three secure mobility scooter stores with charging facilities are proposed within the new mews street;
- The roof of block C has been revised from a brick roof to a slate roof.

3.2 Site and Surroundings

3.2.1 The site is the former Hornsey Police Station which dates from 1884 and was originally part of a suite of civic buildings which included a fire station and library. The site is located on the corner of Glebe Road, Harold Road and Tottenham Lane in Hornsey and to the west side of Tottenham Lane/north side Harold Road/east side of Glebe Road. The existing building occupying the site is 'L' shaped in form and comprises a part two storey, part three storey building known as Hornsey Police Station, primarily fronting Tottenham Lane, with a long lower wing fronting Harold Road. There are a number of ad-hoc single-storey structures contained within the service yard/car park which is accessed off Harold Road.

3.2.2 Immediately north of the site is a row of large two/three storey terrace houses fronting Church Lane. A two/three storey flatted block known as Firemans Flats, faces Glebe Road and backs onto the north-west corner of the site, with flank walls and garden walls forming both the site's northern and part of its western boundary. Tottenham Lane Local Centre is located immediately east of the site and comprises of a shopping parade with commercial units on the ground floor and residential flats on the upper floors.

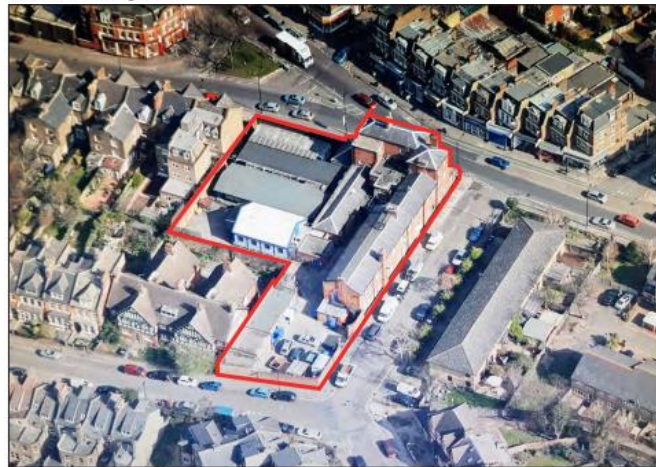
3.2.3 The site has a public transport accessibility level (PTAL) of 4, which is ranked as 'good' access to public transport services.

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

Fig 1 – Aerial View



Aerial View Looking West



Aerial View Looking East

3.3 Relevant Planning and Enforcement history

- 3.3.1 The site has a significant planning history including several alterations and extensions to the building but none relevant to this application.

4. CONSULTATION RESPONSES

- 4.1.1 The proposal was presented to the Planning Sub Committee at a Pre-Application Briefing in July 2022. The minutes are attached in Appendix 6.

4.2 Quality Review Panel

- 4.2.1 The scheme has been presented to Haringey's Quality Review panel on two occasions.

- 4.2.2 Following the second Quality Review Panel meeting August 2022, Appendix 4, the Panel offered their 'warm support' for the scheme, with the summary from the report below;

The panel appreciates the applicant's constructive response to comments made at the previous Quality Review Panel meeting (27 April 2022), and the subsequent improvements to the proposal, and is broadly supportive of the scheme. The panel feels that the revised proposal has the potential to create a high-quality development that will make a positive contribution to the local area. The architecture of the proposed new residential blocks seems appropriate given the materiality and scale of the largely brick Victorian and Edwardian buildings of the surrounding area. The panel still feels that the elevation of Block C at the corner of Glebe Road and Harold Road facing the conservation area needs more variety in materials. The panel also encourages further thought about the security of windows at low level, which need to be fully openable to maximise ventilation. It supports the layout and landscaping of the shared courtyard, and the design approach to the three gateways to the development, on Tottenham Lane and Harold Road. The panel emphasises the importance to the scheme's success of carrying through the detailing, to prevent its being subject to value-engineering as it approaches construction.

4.3 Development Management Forum

- 4.3.1 The proposals were presented to a Development Management Forum in July 2022.
- 4.3.2 The notes from the Forum are set out in Appendix 5.

4.4 Application Consultation

- 4.4.1 The following were consulted regarding the application:

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

INTERNAL:

Design Officer

Comments provided are in support of the development

Conservation Officer

Comments provided and raise no objections

Transportation

No objections raised, subject to conditions and relevant obligations

Waste Management

No objections

Building Control

No objection

Trees

No objection

Surface and flood water

No objections

Carbon Management

No objections, subject to conditions and S106 legal clause

Lead Pollution

No objection, subject to conditions

Public Health

No objection

Housing

No objection

EXTERNAL

Thames Water

No objection subject to conditions and informatives

Designing out crime

No objections, subject to conditions

Transport for London

No objection

London Fire Brigade

No objection

5. LOCAL REPRESENTATIONS

5.1 The following were consulted:

381 Neighbouring properties

Site notices were erected in the vicinity of the site

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

No of individual responses: 80

Objecting: 71

Supporting: 4

Others: 5

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

Land Use and housing

- No affordable housing provision
- Excessive number of dwellings proposed
- Concerns the affordable housing is in a separate block
- Concerns the affordable housing does not meet required space standards
- Concerns with the viability of the scheme
- The level of social housing should be increased
- On site affordable housing should not be exchanged for a commuted sum
- Affordable housing and extra care sheltered housing should be a priority
- There should be no distinction between the private and affordable blocks
- Flat C2 has no dedicated amenity space and no view to the communal garden
- The site should be retained to benefit the local community
- The loss of the police station will result in more crime in the area

Impact on Heritage Assets

- Design not in keeping with the Conservation Area
- The height is not in keeping with the Conservation Area
- The internal building should be refurbished rather than extended
- Aluminium windows should not be allowed in the Conservation Area

- The existing police station façade should be retained
- Harm to the Conservation Area

Size, Scale and Design

- The design is not in keeping with surrounding properties
- The design is not in keeping with the existing Police Station building
- The design of block C is bland
- The design lacks character
- The communal garden needs soft landscaping
- Poor quality design
- The scheme should be redesigned
- The development should be significantly reduced in scale
- Excessive height, bulk, massing and scale of block B
- Concerns with the exact height of the mews houses
- Overbearing in relation to neighbouring buildings
- Overdevelopment of site
- The design of the new blocks should be similar to the retained police station building
- The low boundary wall on Tottenham Lane should be repaired
- Block C should be set further back from the pavement
- The skyline will be obscured by the development
- The amendments to the scheme are not sufficient

Impact on neighbours

- Loss of privacy/overlooking/overshadowing
- A daylight assessment should be carried out
- Loss of daylight and sunlight
- Noise and disturbance
- The balconies of the mews houses at first floor level should be removed
- The development is in close proximity to the Firemans Cottages

Parking, Transport and Highways

- Pressure on parking
- Road safety concerns
- EV charging points should be provided for parking and cycle storage
- The central communal space should be retained for parking
- Parking should be provided
- Concerns with delivery and servicing vehicles using the mews lane
- Parking permits should be restricted for future occupants
- Concerns parking with take place outside CPZ operation times
- Disabled parking bays should be provided
- Underground parking should be considered

Environment and Public Health

- Significant increase in pollution
- Increased emissions

- Noise pollution
- Major disruption to the local community
- Impact on the quality of life of local residents
- Dust concerns
- Pressure on existing infrastructure
- The courtyard space should be publicly accessible
- The applicants should consider a new tree at the pedestrian crossing to provide more screening
- Insufficient refuse provision
- Planting will need to be maintained well

5.4 The following issues raised are not material planning considerations:

- Impact on property values (**Officers Comments:** This is a private matter and therefore not a material planning consideration)
- Consultation process not adequate (**Officers comments:** The consultation process was extensive and excluding the applicant's own consultation consisted of a wellattended DM Forum before submission of the planning application; presentation to Cllrs at public Committee meeting at pre-application stage. Once the application was submitted, the Council consulted residents twice by letter, site notice and press notice. The application was able to be viewed on the council's website)
- Lack of transparency to the businesses that were engaged (**Officers comments:** Officers are satisfied that adequate community engagement took place)

6 MATERIAL PLANNING CONSIDERATIONS

6.1 Statutory Framework

6.1.2 Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires planning applications to be determined in accordance with policies of the statutory Development Plan unless material considerations indicate otherwise.

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

1. Principle of the development
2. Affordable Housing and Housing Mix
3. Heritage Impact
4. Design and appearance
5. Residential Quality
6. Impact on Neighbouring Amenity
7. Parking and Highways
8. Sustainability, Energy and Climate Change
9. Urban Greening, Trees and Ecology
10. Flood Risk and Drainage
11. Air Quality and Land Contamination

- 12. Fire Safety
- 13. Employment
- 14. Conclusion

6.2 Principle of the development

National Policy

- 6.2.1 The National Planning Policy Framework 2021 (hereafter referred to as 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. It advocates policy that seeks to significantly boost the supply of housing and requires local planning authorities to ensure their Local Plan meets the full, objectively assessed housing needs for market and affordable housing.
- 6.2.2 Paragraph 93 of the National Planning Policy Framework 2021 (hereafter referred to as the NPPF) seeks to provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should:
- c) guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community’s ability to meet its day-to-day needs;

Regional Policy

- 6.2.3 The London Plan (2021) Table 4.1 sets out housing targets for London over the coming decade, setting a 10-year housing target (2019/20 - 2028/29) for Haringey of 15,920, equating to 1,592 dwellings per annum.
- 6.2.4 London Plan Policy H1 ‘Increasing housing supply’ states that boroughs should optimise the potential for housing delivery on all suitable and available brownfield sites, including through the redevelopment of surplus public sector sites.
- 6.2.5 London Plan Policy D6 seeks to optimise the potential of sites, having regard to local context, design principles, public transport accessibility and capacity of existing and future transport services. It emphasises the need for good housing quality which meets relevant standards of accommodation.
- 6.2.6 Part B of London Plan Policy D11 states that 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

6.2.7 Part F of London Plan Policy S1 states that 'Development proposals that would result in a loss of social infrastructure in an area of defined need as identified in the borough's social infrastructure needs assessment required under Part A should only be permitted where:

1) there are realistic proposals for re-provision that continue to serve the needs of the neighbourhood and wider community, or;

2) the loss is part of a wider public service transformation plan which requires investment in modern, fit for purpose infrastructure and facilities to meet future population needs or to sustain and improve services.

6.2.8 Part G of London Plan Policy S1 states that 'Redundant social infrastructure should be considered for full or partial use as other forms of social infrastructure before alternative developments are considered, unless this loss is part of a wider public service transformation plan (see Part F2)

Local Policy

6.2.9 The Haringey Local Plan Strategic Policies DPD (hereafter referred to as Local Plan), 2017, sets out the long-term vision of the development of Haringey by 2026 and sets out the Council's spatial strategy for achieving that vision.

6.2.10 Local Plan Policy SP1 states that the Council will maximise the supply of additional housing by supporting development within areas identified as suitable for growth.

6.2.11 Local Plan Policy SP2 states that the Council will aim to provide homes to meet Haringey's housing needs and to make the full use of Haringey's capacity for housing by maximising the supply of additional housing to meet and exceed the stated minimum target, including securing the provision of affordable housing. The supporting text to Policy SP2 of the Local Plan specifically acknowledges the role these 'small sites' play towards housing delivery.

6.2.12 The Development Management Development Plan Document 2017 (DM DPD) supports proposals that contribute to the delivery of the planning policies referenced above and sets out its own criteria-based policies against which planning applications will be assessed.

6.2.13 Policy DM10 of the DM DPD seeks to increase housing supply and seeks to optimise housing capacity on individual sites.

6.2.14 Policy DM49 of the DM DPD states that where a development proposal may result in the loss of a facility, evidence will be required.

5 Year Housing Land Supply

6.2.15 The Council at the present time is unable to fully evidence its five-year supply of housing land. The 'presumption in favour of sustainable development' and paragraph 11(d) of the NPPF should be treated as a material consideration when determining this application, which for decision-taking means granting permission unless the application of policies in the NPPF that protect areas or assets of particular importance provides a clear reason for refusal or any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in the NPPF taken as a whole. Nevertheless, decisions must still be made in accordance with the development plan (relevant policies summarised in this report) unless material considerations indicate otherwise (of which the NPPF is a significant material consideration).

Land Use Principles

6.2.16 The proposed development would replace the existing redundant Police Station site (Use Class Sui Generis) with a wholly residential development. The loss of the police station is assessed in land use policy terms as follows;

Loss of existing police station

6.2.17 The site is currently occupied by a former police station (Use Class Sui Generis). The police station as a land use would not be re-provided as part of the proposed scheme.

6.2.18 The applicant has advised that the property was vacated by the Metropolitan Police) in March 2021. The existing building comprises of cellular office spaces, interview rooms and 'holding' cells. The office space itself has been vacant since 2020 although the police station operated until March 2021. Although the Police Station has been closed for some time now, in land use planning terms the proposed development would result in the loss of the site as a community facility – Appendix F of the Council's Development Management DPD defines police buildings as a community facility. The Council essentially seeks to protect the loss of community facilities whilst maintaining and improving community safety in the Borough. Further, Policy D11 of the London Plan seeks to provide the necessary infrastructure to maintain a safe and secure environment and Policy S1 of the London Plan seeks to address re-provision, loss and redundant social infrastructure

6.2.19 Policy DM49 of the DM DPD - Managing the Provision and Quality of Community Infrastructure states that:

A) The Council will seek to protect existing social and community facilities unless a replacement facility is provided which meets the needs of the community.

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

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

Policy DM49 (C) also requires, where a proposal results in the loss of a community facility, evidence and marketing information demonstrating that the premises has been marketed for use as a community facility for a reasonable length of time (minimum 12 months) and that no suitable user has been/or is likely to be found.

6.2.20 Notwithstanding above, paragraph 7.17 of Policy DM49 of the DM DPD states;

The loss or change of use of existing community facilities will be acceptable if it is shown that the disposal of assets is part of a wider programme to deliver public services and related infrastructure. Such a programme will be required to demonstrate that the facility under consideration is neither needed nor viable, and that adequate facilities are, or will be made available to meet the ongoing needs of the local population. In such cases no accounts or marketing information will be required.

6.2.21 Paragraph 7.17 of Policy DM49 is considered to be applicable to this proposal as the proposed closure and disposal of the Police Station forms part of the Metropolitan Police Service's rationalisation and investment programme to reduce costs and provide modern, new facilities to support future policing across London. The applicant has provided evidence within the planning statement to demonstrate that the former Police Station site has been closed and disposed as part of a wider programme to deliver public services. The following evidence includes the Mayor's Office for Policing and Crime (MOPAC)'s Police and Crime Plan 2017 – 2021 which states that the proposed closure and disposal of Hornsey Police Station forms part of the Metropolitan Police Service's rationalisation and investment programme to reduce costs and provide modern, new facilities to support future policing across London. This includes closing old and outdated buildings that are no longer fit for purpose re-investing the proceeds of site sales into modern ways of working, and supporting the Mayor's Office for Policing and Crime (MOPAC)'s Police and Crime Plan 2017 – 2021

6.2.22 The MOPAC Estate Strategy 2013-2016 included closing old and outdated buildings that are no longer fit for purpose and re-investing the proceeds of site sales into modern ways of working. The Public Access Strategy (2017) confirmed plans to reduce the number of police front counters in London and save an

additional £8 million – equivalent to the cost of 140 police constables – in order to protect and support frontline policing as much as possible, and keep Londoners safe, in the face of Government cuts to police funding. The MOPAC evidence suggests that 1.7 crimes were recorded daily at the front counter (May 2017) at Hornsey Police Station.

6.2.23 Further to the above police commissioned documents, the applicant has provided evidence in the planning statement from various members of Police Service leadership setting out that the rationalising of the police estates will not lead to a reduction of public safety but only seek to improve it. The planning statement states that at a more local level and specific to Haringey the Borough Commander assured that the loss of Hornsey Police Station will not have a negative impact on public safety/ policing services in the locality and set out that with the roll-out of mobile technology, police officers were able to be out on the streets for longer and to have greater visibility.

6.2.24 Therefore, given that the disposal of the former Police Station site forms part of a wider programme to deliver public services and that the Borough Commander has provided assurances that the policing of the area will remain available to meet the ongoing needs of the local population the proposed loss of the police station is considered acceptable as is no longer required and would not result in a shortfall in provision in accordance with Policy DM39.

Residential Use

6.2.25 The proposal would introduce 29 new dwellings that would contribute to meeting the council's identified housing targets.

6.2.26 The proposal would introduce a new residential land use on the site in place of the former Police Station, which is a community use and it is considered that the proposed residential scheme is an acceptable alternative use for the site given the above assessment and the proposed new housing development with a mix of 1, 2 and 3 bedroom homes will provide a much-needed contribution to the Borough's housing stock.

Conclusion

6.2.27 Given the above considerations, the loss of the existing police station with the replacement of good quality housing stock is therefore supported and subject to all other relevant considerations as assessed below.

6.3 Affordable Housing and Housing Mix

Housing and Affordable Housing Provision

- 6.3.1 The NPPF 2021 states that where it is identified that affordable housing is needed, planning policies should expect this to be provided on site in the first instance. The London Plan also states that boroughs may wish to prioritise meeting the most urgent needs earlier in the Plan period, which may mean prioritising low-cost rented units.
- 6.3.2 Local Plan Policy SP2 states that subject to viability, sites capable of delivering 10 units or more will be required to meet a Borough wide affordable housing target of 40%, based on habitable rooms, with tenures split at 60:40 for affordable rent and intermediate housing respectively. Policy DM13 of the DM DPD reflects this approach and sets out that the Council will seek the maximum reasonable amount of affordable housing provision when negotiating on schemes with site capacity to accommodate more than 10 dwellings, having regard to Policy SP2 and the achievement of the Borough-wide target of 40% affordable housing provision, the individual circumstances of the site Development viability; and other planning benefits that may be achieved.
- 6.3.3 As a former Police station the site is included in the definition of 'Public Sector Land' in the London Plan which includes "land that has been released from public ownership..." In this regard London Plan Policy H4 states that the strategic target is for 50 per cent of all new homes delivered across London to be genuinely affordable. Specific measures to achieve this aim include public sector land delivering at least 50 per cent affordable housing on each site and public sector landowners with agreements with the Mayor delivering at least 50 per cent affordable housing across their portfolio. Part B of London Plan Policy H5 states that the threshold level of affordable housing on gross residential development is initially set at 50 per cent for public sector land where there is no portfolio agreement with the Mayor
- 6.3.4 Paragraph 4.5.5 of London Plan Policy H4 states that the Mayor recognises that public sector land can play a significant role in meeting affordable housing need. The threshold for public sector land (land that is owned or in use by a public sector organisation, or company or organisation in public ownership, or land that has been released from public ownership and on which housing development is proposed) is set at 50 per cent to be considered under the Fast Track Route. This is because these sites represent an opportunity to meet a range of objectives, including making better use of sites, improving services and delivering more affordable housing. Moreover, as public assets, these landholdings should be used to deliver development and outcomes that are most needed by – and matter most to – the public.
- 6.3.5 The Mayor of London's Affordable Housing and Viability (AHV) SPG states that It is widely recognised that land in public ownership should make a significant contribution towards the supply of new affordable housing. Land that is surplus to public sector requirements typically has a low value in its current use, allowing higher levels of affordable housing to be delivered. For

these reasons the Mayor has an expectation that residential proposals on public land should deliver at least 50 per cent affordable housing to benefit from the Fast Track Route.

- 6.3.6 Where a public landowner has an agreement in place with the Mayor to provide 50 per cent affordable homes across a portfolio of sites, individual sites which meet or exceed the 35 per cent affordable housing threshold and required tenure split may be considered under the Fast Track Route. Where such an agreement is not in place, schemes that do not provide 50 per cent affordable housing will be considered under the Viability Tested Route.

Viability assessment and review

- 6.3.7 The applicant proposes 8 London Affordable Rent units which equates to 27.58% of all housing on site that would represent 19.4% affordable housing by habitable room.
- 6.3.8 The proposed development does not meet the 50% threshold as set out in the above policies, the affordable housing is therefore considered under the Viability test Route. The applicant has submitted a viability assessment to support the shortfall of the required threshold of affordable housing units as set out in the above mentioned policies. The Applicant's Affordable Housing & Viability Statement (AHVS) was independently assessed and it was found that;
- 6.3.9 The scheme as proposed (8 London Affordable Rent units) both meets, and is capable of, supporting contributions towards the Council's affordable housing provision. The provision of an all London Affordable Rented scheme, is deemed acceptable in this instance for affordability and saleability on to an affordable housing provider, although this is not in line with the Council's policy compliant tenure split at 60:40 for affordable rent and intermediate housing respectively. The Residual Land Value of the scheme has been assessed against the Existing Use Value (EUV) of the police station which was concluded to be £275psf. A 20% premium was considered to be reasonable to incentivise the landowner to sell the land and therefore the Benchmark Land Value was concluded to be £3.993m.
- 6.3.10 It was therefore concluded that the affordable housing offer is the maximum reasonable amount and the development is unable to provide additional affordable housing than proposed or a payment in lieu of onsite provision. The Financial Viability Assessment (FVA) submitted in support of the planning application is attached in Appendix 7
- 6.3.11 Early and late stage viability review mechanisms have been secured by legal agreement in order to capture any uplift in values on completion of the units.

6.3.12 The flats in Block C will be solely London Affordable Rented accommodation on ground, first and second floor level. Although the affordable tenures provide 100% affordable rented homes, maximising the provision of solely affordable rent units is considered acceptable. London Affordable Rent units have a greater impact on viability than other affordable tenures. It is acknowledged that social rented is the Council's preferred low cost rented option. However, it is noted that London Affordable Rent is now the main low cost affordable rented housing that the GLA currently expects to fund.

6.3.13 A S106 planning obligation will ensure that the Council has the first right of refusal to purchase all of the affordable rent units.

6.3.14 The applicant has confirmed that the scheme is designed so that all future residents will have access to the communal amenity space.

Affordable Housing Dwelling Mix

6.3.15 Haringey's Housing Strategy identifies a targeted housing mix for affordable housing. The table below sets out the proposed development's dwelling mix by tenure and how this relates to the target mix for affordable housing.

Unit type	Low Cost Rent	Low Cost Rent Target	Low Cost Rent Proposed
1 bed	5	10%	62.5%
2 bed	2	45%	25%
3 bed	1	45%)	12.5%
Total units	8		
Total (Hab Rooms)	20		

6.3.16 The proposed affordable housing dwelling mix provides a higher proportion of one bed units. Whilst this does not meet the Council's recommended dwelling mix for new affordable housing, Block C is constrained due to its layout and orientation and therefore 1 bed homes maximise the space within the block and in turn maximises the level of affordable units. The applicant has confirmed that they have been liaising with a number of Housing Associations who are satisfied with the proposed unit mix proposed for Block C.

Overall Housing Mix

6.3.17 London Plan (2021) Policy H10 states that schemes should generally consist of a range of unit sizes. To determine the appropriate mix of unit sizes in relation to the number of bedrooms for a scheme, it advises that regard is made to several

factors. These include robust evidence of local need, the requirement to deliver mixed and inclusive neighbourhoods, the nature and location of the site (with a higher proportion of one and two bed units generally more appropriate in locations which are closer to a town centre or station or with higher public transport access and connectivity), and the aim to optimise housing potential on sites.

6.3.18 The London Plan (2021) states that Boroughs may wish to prioritise meeting the most urgent needs earlier in the Plan period, which may mean prioritising low cost rented units of particular sizes.

6.3.19 Policy SP2 of the Local Plan and Policy DM11 of the DM DPD adopts a similar approach.

6.3.20 Policy DM11 of the DM DPD states that the Council will not support proposals which result in an over concentration 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.

6.3.21 The overall mix of housing within the proposed development is as follows:

	Accommodation mix		
Unit type	Total units	%	Wheelchair accessible (M4 3)
1-bed 2- person dwelling	6	20%	3
2-bed 3- person dwelling	4	37.9%	
2-bed 4- person dwelling	7		
3-bed 5- person dwelling	6	27.8%	
3-bed 6- person dwelling	2		
4-bed 5- person dwelling	4	13.6%	
Total	29	100%	3 (10%)

6.3.22 Twelve of the proposed homes (41.4%) would be three/four-bedroom family sized accommodation. This substantial provision of family-sized homes would avoid an overconcentration of smaller units in the area and would contribute significantly towards meeting the demand for family housing locally and in the Borough generally. The development as a whole would provide a mix of residential units that would contribute towards the creation of mixed and balanced neighbourhoods in this area. The proposed housing mix is therefore considered acceptable with regard to the above planning policies.

6.4 Heritage Impact

Policy Context

- 6.4.1 Paragraph 194 of the NPPF states that in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting
- 6.4.2 Paragraph 202 of the NPPF states 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'
- 6.4.3 Policy HC1 of the London Plan seeks to ensure that development proposals affecting heritage assets and their settings, should conserve their significance. This policy applies to designated and non-designated heritage assets. Policy SP12 of the Local Plan and Policy DM9 of the DM DPD set out the Council's approach to the management, conservation and enhancement of the Borough's historic environment, including the requirement to conserve the historic significance of Haringey's heritage assets and their settings.
- 6.4.4 Policy DM9 of the DM DPD states that proposals affecting a designated or non-designated heritage asset will be assessed against the significance of the asset and its setting, and the impact of the proposals on that significance; setting out a range of issues which will be taken into account. It also states that buildings projecting above the prevailing height of the surrounding area should conserve and enhance the significance of heritage assets, their setting, and the wider historic environment that should be sensitive to their impact.

Legal Context

- 6.4.5 There is a legal requirement for the protection of Conservation Areas. The legal position on the impact on these heritage assets is as follows, Section 72(1) of the Listed Buildings and Conservation Areas Act 1990 provides: "In the exercise, with respect to any buildings or other land in a conservation area, of any functions under or by virtue of any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area." Among the provisions referred to in subsection (2) are "the planning Acts".
- 6.4.6 Section 66 of the Act contains a general duty as respects listed buildings in exercise of planning functions. Section 66 (1) provides: "In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its

setting or any features of special architectural or historic interest which it possesses.”

- 6.4.7 The Barnwell Manor Wind Farm Energy Limited v East Northamptonshire District Council case states that "Parliament in enacting section 66(1) intended that the desirability of preserving listed buildings should not simply be given careful consideration by the decision-maker for the purpose of deciding whether there would be some harm, but should be given “considerable importance and weight” when the decision-maker carries out the balancing exercise.”
- 6.4.8 The judgment in the case of the Queen (on the application of The Forge Field Society) v Sevenoaks District Council says that the duties in Sections 66 and 72 of the Listed Buildings Act do not allow a Local Planning Authority to treat the desirability of preserving listed buildings and the character and appearance of conservation areas as mere material considerations to which it can simply attach such weight as it sees fit. If there was any doubt about this before the decision in Barnwell, it has now been firmly dispelled. When an authority finds that a proposed development would harm the setting of a listed building or the character or appearance of a conservation area or a Historic Park, it must give that harm considerable importance and weight.
- 6.4.9 The Authority’s assessment of likely harm to the setting of a listed building or to a conservation area remains a matter for its own planning judgment but subject to giving such harm the appropriate level of weight and consideration. As the Court of Appeal emphasised in Barnwell, a finding of harm to the setting of a listed building or to a conservation area gives rise to a strong presumption against planning permission being granted. The presumption is a statutory one, but it is not irrebuttable. It can be outweighed by material considerations powerful enough to do so. An authority can only properly strike the balance between harm to a heritage asset on the one hand and planning benefits on the other if it is conscious of the strong statutory presumption in favour of preservation and if it demonstrably applies that presumption to the proposal it is considering.
- 6.4.10 In short, there is a requirement that the impact of the proposal on the heritage assets be very carefully considered, that is to say that any harm or benefit needs to be assessed individually in order to assess and come to a conclusion on the overall heritage position. If the overall heritage assessment concludes that the proposal is harmful then that should be given "considerable importance and weight" in the final balancing exercise having regard to other material considerations which would need to carry greater weight in order to prevail.
- 6.4.11 The site is located within the Hillfield Conservation Area and is occupied by the former and now redundant Hornsey Police Station.
- 6.4.12 After the junction with Glebe Road, fronting Tottenham Lane, Hornsey Police Station is a three-storey building constructed in 1915 in a Baroque style to the

designs of John Dixon Butler, architect to the Metropolitan Police. It is constructed of red brick with terracotta banding and window surrounds, six-over-six sash windows and a bold pedimented entrance inscribed 'POLICE'. It replaced an earlier police station of c.1868 and originally formed part of a fine group of civic buildings including a public library, demolished in the 1960s after the library was relocated to Crouch End, and a fire station, which has also been demolished. None of the buildings currently on site are statutorily or locally listed.

6.4.13 The site and in particular, the former Police Station is considered to make a positive contribution to the streetscape and wider conservation area. Whilst new-build development on the site is supported in principle, it is crucial that any proposed development fits into its surrounding historic environment, which would be key to its success.

6.4.14 The Conservation Officer has advised that the amendments to block C which includes revising the roof from brick to slate is now considered to preserve the character and appearance of Hillfield Conservation Area, in compliance with Paragraph 206 of the NPPF.

6.4.15 In terms of Block B of the proposal, the Conservation Officer advises that the proposed design, whilst well-designed and articulated, is overly-busy when considered in the immediate environs of Hornsey Police Station and would detract from its prominence and visual dominance within the streetscape and wider conservation area. The Conservation Officer considers that the harm would be 'less than substantial', making Paragraph 202 of the NPPF relevant. The Conservation Officer concludes that the proposed scheme is acceptable from a conservation perspective as it will lead to a very low, less than substantial harm to the significance of the conservation area and its assets. Officers consider this low level of harm would be more than outweighed by the several significant public benefits of the proposed development namely the provision of affordable housing; bringing a redundant heritage asset back into beneficial and sustainable use thus securing its long term future, the provision of high quality accessible housing which will meet the Council's sustainability objectives and will provide a significant increase in urban greening and biodiversity. With the exception of the low level of 'less than substantial' harm arising from Block B, the remainder of the scheme is considered to preserve the character and appearance of the conservation area.

6.4.16 Given the above and the support from the design officer and the QRP for the design of Block B The proposed development in conservation and heritage terms is therefore acceptable.

6.5 Design and Appearance

National Policy

- 6.5.1 Chapter 12 of the NPPF (2021) states that good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.
- 6.5.2 Chapter 12 also states that, amongst other things, planning decisions should ensure that developments function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development and be visually attractive due to good architecture, layouts, and appropriate and effective landscaping.

Regional Policy – London Plan

- 6.5.3 The London Plan (2021) policies emphasise the importance of high-quality design and seek to optimise site capacity through a design-led approach. Policy D4 of the London Plan notes the importance of scrutiny of good design by borough planning, urban design, and conservation officers (where relevant). It emphasises the use of the design review process to assess and inform design options early in the planning process (as taken place here).
- 6.5.4 Policy D6 of the London Plan seeks to ensure high housing quality and standards and notes the need for greater scrutiny of the physical internal and external building spaces and surroundings as the density of schemes increases due the increased pressures that arise. It includes qualitative measures such as minimum housing standards.

Local Policy

- 6.5.5 Policy SP11 of the Haringey Local Plan requires that all new development should enhance and enrich Haringey's built environment and create places and buildings that are high quality, attractive, sustainable, safe and easy to use.
- 6.5.6 Policy DM1 of the DM DPD requires development proposals to meet a range of criteria having regard to several considerations including building heights; forms, the scale and massing prevailing around the site; the urban grain; and a sense of enclosure. It requires all new development to achieve a high standard of design and contribute to the distinctive character and amenity of the local area.
- 6.5.7 Policy DM6 of the DM DPD expects all development proposals to include heights of an appropriate scale, responding positively to local context and achieving a high standard of design in accordance with Policy DM1 of the DM DPD. For buildings projecting above the prevailing height of the surrounding area it will be necessary to justify them in in urban design terms, including being of a high design quality.

Assessment

Quality Review Panel (QRP) Comments:

- 6.5.8 The Quality Review Panel (QRP) has assessed the scheme in full at pre-application stage twice (on 27 April 2022 and 17 August 2022). The panel on the whole supported the scheme.
- 6.5.9 The full Quality Review Panel (QRP) report of the review on 17 August 2022 is attached in Appendix 4. The Quality Review Panel's summary of comments is provided below;

The panel appreciates the applicant's constructive response to comments made at the previous Quality Review Panel meeting (27 April 2022), and the subsequent improvements to the proposal, and is broadly supportive of the scheme. The panel feels that the revised proposal has the potential to create a high-quality development that will make a positive contribution to the local area. The architecture of the proposed new residential blocks seems appropriate given the materiality and scale of the largely brick Victorian and Edwardian buildings of the surrounding area. The panel still feels that the elevation of Block C at the corner of Glebe Road and Harold Road facing the conservation area needs more variety in materials. The panel also encourages further thought about the security of windows at low level, which need to be fully openable to maximise ventilation. It supports the layout and landscaping of the shared courtyard, and the design approach to the three gateways to the development, on Tottenham Lane and Harold Road. The panel emphasises the importance to the scheme's success of carrying through the detailing, to prevent its being subject to value-engineering as it approaches construction. Further details on the panel's views are provided below.

- 6.5.10 Detailed QRP comments from the most recent review together with the officer comments are set out below in Table 1.

Table 1

Panel Comment	Officer Response
Architecture	
<p>The panel is supportive of the ‘weaving past and present’ theme and feels that the new-build aspects of the scheme bring contemporary ideas to the development that sit well alongside the existing building.</p>	<p>QRP comment noted</p>
<p>The panel underlines the importance of ensuring high-quality detailing throughout the scheme and that this cannot be diminished through value-engineering.</p>	<p>QRP comment noted. A condition will be imposed that requires details and samples of all key materials and further details of the design and detailing of key junctions including cills, jambs and heads of windows, balconies and roof parapet to be agreed, prior to commencement of works on site.</p>
<p>The panel welcomes the progress made in the development of the internal layouts of the flats, which it sees as an improvement on the previous proposals.</p>	<p>QRP comment noted.</p>
<p>The panel suggests further consideration of the scheme’s window detailing in relation to ventilation and safety, particularly in Block C. This might include the introduction of guardrails, or alternatives to fully opening windows.</p>	<p>To address the window detailing in regards to ventilation, the applicant has revised their overheating strategy to include a dynamic thermal modelling assessment. In regards to safety, the Secure by Design Officer does not object to the proposed development subject to conditions requiring details of and compliance with the principles and practices of the Secured by Design Award Scheme</p>
<p>The panel still feels that, in contrast to the rich palette of the conservation area, the appearance of Block C is too uniform in texture and, in particular, is pleased that the Glebe Road elevation will be considered further.</p>	
<p>The panel has reservations about using brick as the roofing material for Block C — where, given the local context, this</p>	<p>To address this issue raised by the panel the roof material of Block C has been revised from brick to slate which is more</p>

<p>might be expected to be slate — but appreciates that this forms part of the ‘weaving’ theme. If brick is to be used, the panel stresses the importance of ensuring that this aspect of the scheme is well detailed in order to create a richness of texture.</p> <p>The panel finds successful the way that the architecture of the new additions flows from the existing police station frontage and is also happy that each unit has a ‘front’ and a ‘back’.</p>	<p>in keeping with the local context.</p> <p>QRP comment noted</p>
<p>Access Strategy</p> <p>The panel supports the re-positioning of the refuse / bin stores on the site, feeling that, as well as eliminating their negative impact on the Tottenham Lane frontage, the new locations will be more functional.</p> <p>It also welcomes the parking provision for wheelchair-accessible and family units, noting that on-street parking for the development will be for 13 spaces (an increase of two spaces from the dedicated police parking of 11).</p> <p>The panel feels that access to the wheelchair-accessible units in Block B has been adequately addressed by the inclusion of a platform lift where there are three steps, level access to the lift, ample circulation space and access into / out of units, acknowledging that the details are to be finalised.</p>	<p>QRP comment noted</p> <p>QRP comment noted</p>
<p>Landscape</p> <p>The panel welcomes the simplification of levels of the interior courtyard, the softer separation using trees and planting, and the more integrated landscaping, feeling</p>	<p>QRP comment noted. The applicant has submitted a landscape statement prepared by rna architecture ltd which explains the landscape strategy in more</p>

<p>that these revisions have created a calmer environment. As elsewhere, the panel stresses the importance of the high-quality detailing of this aspect of the development.</p> <p>Equally, the panel highlights that management of the development's communal spaces will be key to its success.</p>	<p>detail.</p> <p>QRP comment noted. A condition will be imposed that requires details of both hard and soft landscape works. The soft landscape works would require details of a long term management programme.</p>
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Image 2 Design in Context



CGI: Tottenham Lane



CGI: Mews Street



CGI: Block C Corner View

Height, Bulk and Massing

6.5.11 The Council's Design Officer has been consulted and notes that the height, massing and scale of the proposed 'new build' part of the development (Blocks B and C) successfully responds to the site's context and existing built form of surrounding buildings. In terms of Block B, the proposed height of four storeys on the Tottenham Lane frontage retains the primacy of the police station building in that it matches the height of the retained police station to its eaves.

6.5.12 The Council's design officer notes that the height of Block B is also appropriate in that there was previously a library and fire station of a similar height and monumental to the police station in what later became the gap. The bulk and massing is also similar to those of the shopping parades on Tottenham Lane. The height difference between Block B and the terrace on Church Lane is modest. Whilst its flat roof is contrasting to the prevalent local pitched roofs it is not completely out of character where some of the shopping parades have high parapets, and even the police station itself has a shallow pitched roof which can barely be seen from the street. The mews houses that run to the rear of Block B follow its form but step down in height gradually as the mews street gently slopes down, resulting in the last mews house lower in height than the Fireman's Flats that back onto the end of the mews. In terms of block C the proposed height of two storeys, with modest minimalist front facing dormer windows on the corner of Harold Road and Glebe Road, modestly matches the neighbours' height, bulk and massing. This also appropriately expresses the more residential, side street character of Harold and Glebe Road.

Form, Rhythm and Fenestration

6.5.13 The existing Police Station to be retained on the site (Block A) would remain the dominant block from the key corner of Tottenham Lane to most of its length along Harold Road. The new build blocks (Blocks B and C) with their contrasting detailed design to the retained Police Station building responds successfully to its

rhythm and proportions in two contrasting manners that express their different locations and contexts.

- 6.5.14 The Design officer advises that Block B, facing Tottenham Lane and the triangular public space, is designed following a “weaved” concept which takes its design inspiration from the age of the construction of the Police Station and its surroundings in a contemporary design that maintains the richness of decoration and detail and animation to the street front found in other residential buildings along Tottenham Lane and other Victorian-Edwardian high streets. The “chequerboard” effect references and emulates the scale of the projecting porches, bay windows and dormers of surrounding Edwardian residential terraces and retail parades, whilst the overall composition is organised into three bays, matching the rhythm of the terraces of houses and retail parades. This design approach is continued into the mews houses, where it further helps provide privacy to residents whilst providing passive surveillance.
- 6.5.15 The Design officer advises that the “minimalist” design of Block C provides a far more calm, restful, domestic, side-street approach, with windows again matching those of the existing police station but in a regularly spaced pattern. The communal entrance is marked by a deep angled brick recess with patterned brickwork above, animating Block C’s southern elevation, and with a corresponding but more modestly detailed front door to the ground floor flat animating its western elevation. The corner is simply faceted, with a mini gable addressing the diagonal route Harold Road takes after the Glebe Road junction. The roof, including its dormer windows, aligned with the main windows below, is in a contrasting slate colour typical of the neighbourhood, but again detailed minimally with a secret gutter.
- 6.5.16 The Design officer advises that there is a fourth family of architectural form in the development. The tall, thin feature between Blocks A and B provides the entrance to Block B as well as an entrance and view through to the central communal amenity space and addresses the level differences between the pavement level and internal floor levels. Similarly, this feature is repeated between Blocks A and C, and Block C and the neighbouring Fireman’s Cottages to provide access to the refuse and cycle stores respectively. Each are designed to be robust metallic, in contrast to the brick of the existing and new buildings and has similarities to the gate over the mews entrance between Block B and end of terrace at 1 Church Lane. They also provide roof terraces to the adjacent flat, and those in Block C also feature an additional cantilevered glass balustraded balcony to the adjacent second floor flat, between the two gables.

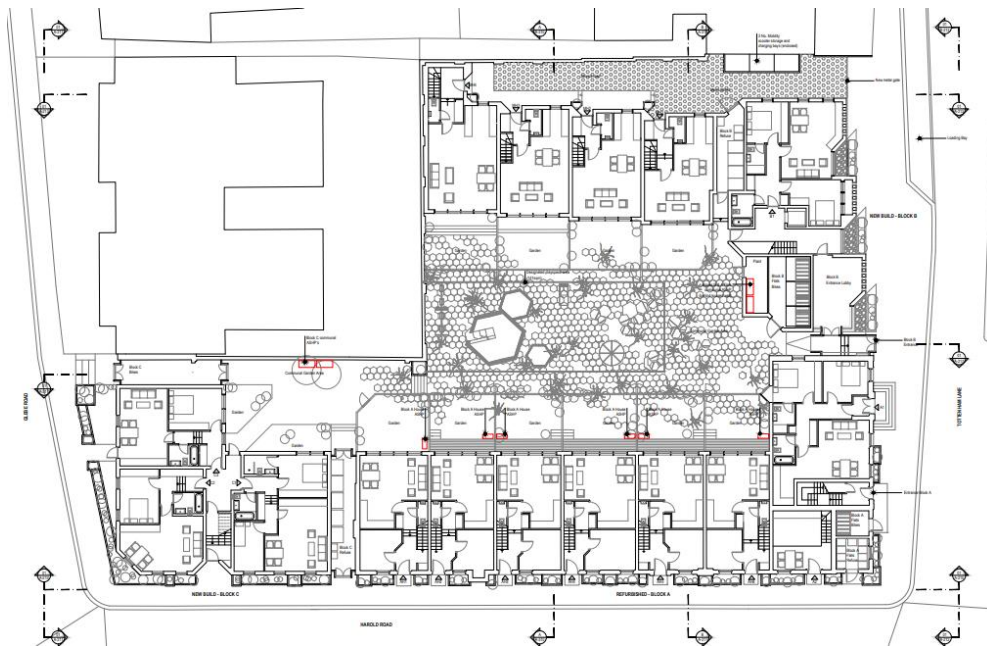
Site Layout, Streetscape Character

- 6.5.17 The Design officer advises that the proposals would maintain and restore the main, monumental, original, three-storey Police Station building on the Tottenham Lane-Harold Road corner, as Block A, and the long, lower, two-storey

wing down most of the Harold Road length of that side of the site converted to six houses but demolishes various one and two storey ad-hoc later side extensions and outbuildings. Block B would fill most of the gap between Block A and the end of terrace on Church Lane. A narrow gap separates Blocks A and B, housing a lower communal entrance, with a wider gap between Block B and the end of terrace house on Church Lane leading to the short private mews street to the rear, which is occupied by four mews houses.

- 6.5.18 The narrow gap between Block C and the two-storey existing wing to Block A, and Block C and the existing neighbouring Fireman's Flats, is filled with contrasting, single-storey infills housing refuse and bike stores. The three blocks, together with the two-storey existing wing behind Block A, the new mews houses behind Block B, and the rear gardens wall of the neighbouring existing Fireman's Flats enclose a large private communal amenity space, accessible to all residents of this development, yet secure from outsiders.
- 6.5.19 The Design Officer advises that these proposals have a generally excellent, straightforward, direct and clearly legible relationship to the street, with existing and new buildings completely lining the surrounding streets, leaving no spaces that are of ambiguous ownership or purpose, and with front doors to the three flatted blocks, the converted houses along Harold Road and two of the ground floor flats within Blocks A and B, having front doors facing and opening off the street, generally behind short defensible space front gardens, with all stretches of street around the site animated and passively surveillance by at least one front door as well as several ground floor habitable room window, generally to a living room or kitchen.
- 6.5.20 The one new street created by this development is the mews street on the northern edge of the site, this is a very short street, that provides access to the four new mews houses behind Block B. The new mews street is gated to to maintain security and would not provide access to the rear of any properties, as the end mews house "wraps around" the end of the mews, which also adds to passive surveillance of the mews street from these houses, as well as all the passive surveillance from the rest of the mews houses and corner flats in Block B, and the end of terrace house bordering the mews, which has an existing high brick boundary wall.

Image 3: Site layout



Materials and Detailing

- 6.5.21 The Design officer advises that the materials and detailing have been carefully considered. Blocks B and C will be predominantly constructed using red brick to match both the existing police station and other neighbouring buildings with some moderate variation. The brick will be treated differently in each of the three blocks.
- 6.5.22 Block A, the converted existing police station, is a sensitive conversion to the front and side facing the street, with existing doors retained and used for flat entrances, bins and bike doors, and new doors sensitively inserted where required to the Harold Road side to match existing in place of the existing windows. Whilst the rear of Block A has greater modifications to replace existing outbuildings and lean-to's the new build elements at the rear are detailed simply and plainly and will not compete with the retained existing elements.
- 6.5.23 In terms of Block B which includes the mews houses, the “weaving” pattern is expressed in projecting and recessed brick panels, some in patterned “hit & miss” brickwork, especially to the ground floor street frontage, to provide a robust, “rusticated” base, to give privacy to habitable room windows, especially bedrooms, and so the first-floor windows read as matching the ground floor windows of the retained police station.

- 6.5.24 Block C is detailed to be “minimalist”; using the same brick but with an invisible gutter and plain, slender cheeked metallic dormer windows. The metallic “gate-like” structures in the gaps between blocks will also require their metal and glass components to be specified and shown to be sufficiently functional and robust to suit their purpose, where impact damage and privacy concerns are a factor.
- 6.5.25 The use of high-quality materials is considered to be key to the success of the design standard. As such, a condition will be imposed that requires details (Scale 1:10 or 1:5) of the communal entrance, overhangs, projections, parapets, soffits, balcony and planter edges will be required in regard to Block B and details of the roof material, bin store, bike store, balcony, gutter, ridge, dormer window and balcony in regards to Block C.

Design Summary

- 6.5.26 The Design Officer supports the proposed development stating that the design of the development is considered a sophisticated and subtle response to what could be a challenging site, that achieves a design of exceptionally high quality, appropriate to context and promising to provide superb new homes. The proposal would bring back into use an architecturally notable former police station that acts as a local landmark, and marker of a potentially attractive and important urban space. The striking, innovative, distinctive and unusual contemporary buildings will fill in the undesirable gaps at either side of the former police station and will complement their locations and settings on appropriate forms for their character. Provided sufficient quality is followed through in the selection of materials, design of details and quality of construction, this proposal has the potential to be an exemplary, award winning new residential development.

6.6 Residential Quality

General Layout

- 6.6.1 The Nationally Described Space Standards set out the minimum space requirements for new housing. The London Plan 2021 standards are consistent with these. London Plan Policy D6 requires housing developments to be of high-quality design, providing comfortable and functional layouts, benefiting from sufficient daylight and sunlight, maximising the provision of dual aspect units and providing adequate and easily accessible outdoor amenity space. It provides qualitative design aspects that should be addressed in housing developments.
- 6.6.2 The Mayor of London’s Housing SPG seeks to ensure that the layout and design of residential and mixed-use development should ensure a coherent, legible, inclusive and secure environment is achieved.

Indoor and outdoor space/accommodation standards

- 6.6.3 All proposed dwellings exceed minimum space standards including bedroom sizes. Generous private gardens are provided to all houses, and balconies are provided to most flats, but many are north-facing and not all are of sufficient size to meet the requirements of the Mayor's Housing SPG Standard 26 due to the constraints of the site. Six of the flats do not have private amenity space. Three of these flats are located in Block A and are constrained due to their location within the existing tall element of the existing police station. Creating such space would dramatically alter the existing building. There are also 3 flats within Blocks B and C that do not have private amenity space due to the constraints of the layout, however all homes would have access to the generous landscaped communal amenity space.
- 6.6.4 A majority of the dwellings have direct access to the communal amenity space with the exception of four flats in Block A who do not have direct access due to the constraints of the site. Access to the communal amenity space would therefore be from the main entrance of Block B. All dwellings have a minimum floor to ceiling height of 2.5m. All dwellings are well laid out to provide useable living spaces and sufficient internal storage space. The units are acceptable in this regard. All flats and houses are at least dual aspect, many triple, all with at least one sunny southerly or westerly aspect.

Accessible Housing

- 6.6.5 London Plan Policy D5 seeks to provide suitable housing and genuine choice for London's diverse population, including disabled people, older people and families with young children. To achieve this, it requires that 10% of new housing is wheelchair accessible and that the remaining 90% is easily adaptable for residents who are wheelchair users. Local Plan Policy SP2 is consistent with this as is Policy DM2 of the DM DPD which requires new developments to be designed so that they can be used safely, easily and with dignity by all.
- 6.6.6 10% of the dwellings achieve Building Regulations M4(3) compliance located within block B (Flats B2, B4 and B6). The flats in Block B provide step free access throughout and the Block incorporates a passenger lift for a wheelchair user. The entrance lobby to Block B will also have a platform lift due to the steps. The applicant has confirmed that the mews houses of Block B and the converted houses of Block A will be able to achieve Building Regulations M4(2) compliance with an internal chair lift. Lift access is not incorporated within Blocks A and C as these buildings are 3 storeys in height. The applicant however has confirmed that all dwellings of these blocks can achieve compliance with Building Regulations M4(2) as all internal steps can be fitted with a platform lift. A platform lift will also be installed in Block C to access the communal amenity space.
- 6.6.7 Occupiers of the three accessible units will have access to the three secure mobility scooter stores with charging facilities proposed within the new mews street. These occupants are also able to apply to have a designated accessible car parking spaces if they meet the relevant criteria.

Child Play Space provision

- 6.6.8 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.
- 6.6.9 The applicant has provided a child yield calculation for the proposed development based on the mix and tenure of units in accordance with the current GLA population yield calculator. The proposed development requires 130.2sqm square metres of play space based on the latest GLA child playspace calculator. The proposed development includes 141sqm of child play space which comprises of informal play space for 0–11 year olds within the communal amenity space. The playspace proposed will include play facilities and a playable landscape treatment incorporating a range of furniture and play elements for children aged from 0-11 years old. The playspace will be accessible to all tenures. For older children (12-17) the site is also well served by parks and open spaces in close proximity to the site - the closest is Priory Park, Alexandra Palace, Crouch End Playing Fields and Highgate Wood which are within walking distance.
- 6.6.10 The play space provision for younger and older children is policy compliant and therefore acceptable.

Outlook and Privacy

- 6.6.11 The proposed development incorporates windows and balconies with an outlook onto the high quality landscaping within the communal amenity space whilst also allowing passive surveillance and animation to the playspace. The homes also have an outlook onto the new soft and hard landscaping proposed around the boundaries of the site facing the street and provides passive surveillance to the street frontage.
- 6.6.12 The layout of the proposal has been carefully designed to avoid overlooking between homes within the development with the narrowest distance between windows or balconies across the communal courtyard being over 18 metres, this distance would ensure a good degree of privacy between the proposed dwellings given the tight constraints of the site. In addition windows close to internal corners are avoided to mitigate privacy concerns.
- 6.6.13 As such, it is considered that appropriate levels of outlook and privacy would be achieved for the proposed units.

Daylight /overshadowing – Future Occupiers

6.6.14 Daylight and sunlight studies have been undertaken to assess the levels of daylight within the proposed development. The study is based on the numerical tests in the new updated 2022 Building Research Establishment (BRE) guidance. Computer modelling software was used to carry out the assessments of the proposed habitable rooms at ground and first floor level where access to daylight will be most restricted.

6.6.15 It concludes that the proposals would achieve good levels of daylight to the proposed dwellings. All principal living rooms on ground and first floor of the whole development will achieve or exceed the recommended level of daylight. 47 (92%) of the bedrooms will achieve or exceed the recommended level of daylight. Taking into account that the BRE guidelines acknowledges that bedrooms are less important and considering the urban location of the site, it is considered that the analysis demonstrates that the scheme will provide accommodation with good access to daylight and the BRE guidelines are achieved.

6.6.16 Overall it is considered the units would benefit from adequate levels of daylight.

Other Amenity Considerations – Future Occupiers

6.6.17 As set out below, further details of air quality will be adequately addressed at a later stage, and as such this matter can be secured by the imposition of a condition (This is covered in more detail under paragraph 6.12.2 of the report).

6.6.18 Further details of noise will be adequately addressed at a later stage, and as such this matter can be secured by the imposition of a condition.

6.6.19 Lighting throughout the site is proposed, details of which will be submitted by the imposition of a condition so to ensure there is no material adverse impacts on future occupiers of the development.

6.6.20 With regards to noise, the application is accompanied by a noise assessment which sets out the glazing requirements to ensure suitable internal noise levels are achieved.

6.6.21 The converted houses of Block A share a communal bin store with the flats of Block C which is located in between the two blocks. Block A flats have their own separate bin store located on the corner of Harold Road and Tottenham Lane. The mews houses in Block B share a bin store with the flats of Block B located along the new mews street. The loading bay allocated at the junction of the mews street and Tottenham Lane is conveniently located to meet the 10m drag distance requirement. The Council's Waste Management Officer is satisfied with the proposed arrangement for the refuse/recycling bin collection.

Security

- 6.6.22 The internal communal amenity space will be overlooked by residents of the proposed development, which will help to prevent any anti-social behaviour. To further deter any anti-social behaviour; the communal internal and external areas include CCTV; there will be video entry system for all flats and there will be resident only fob controlled access to each specific block.
- 6.6.23 The Secured by Design Officer does not object to the proposed development subject to conditions requiring details of and compliance with the principles and practices of the Secured by Design Award Scheme. It is also recommended that a condition be imposed requiring provision and approval of lighting details in the interests of security.

6.7 Impact on Neighbouring Amenity

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

Daylight and sunlight Impact

- 6.7.3 The applicant has submitted a Daylight and Sunlight Assessment that assesses daylight and sunlight to the windows of existing neighbouring residential properties.
- 6.7.4 The assessment finds that overall the impact of the development on existing neighbouring residential properties is very favourable for daylight in that the daylight assessment has considered 95 windows within the neighbouring properties that serve 61 habitable rooms. The results show that 93 (98%) of the windows and 61 (100%) of the rooms will fully comply with the BRE guidelines. The impact on existing neighbouring residential properties is very favourable for sunlight in that the sunlight assessment has considered three rooms within the neighbouring properties. The test shows that all 276 rooms (100%) will achieve

the BRE guidelines. Both the daylight and sunlight results have a relatively low impact on neighbours, especially given that much of the site has been an open air car park and yard for many years, giving those existing neighbours improved daylight and sunlight across the application site than would be expected, the results can therefore be considered wholly acceptable.

Privacy/Overlooking and Outlook

6.7.5 In terms of privacy, the only existing residential neighbours in close proximity are the Firemans Flats. There will be some overlooking between these flats and the new dwellings, but distances are generally reasonable. One first floor bedroom window and one second floor living room window in the north side of Block C will be some 12.2m from the side wall of the rear wing of Firemans Flats, which contains windows at ground and first floor, although they appear to be to kitchens and/or bathrooms. Their main habitable room windows appear to face the street or be east facing. The proposed development (Block B to the rear) is separated from the rear projection of the Firemans Flats by 33.9m furthermore, their outlook onto the communal landscaped courtyard will be a considerable improvement on the previous working yard to the police station and there is an existing boundary wall which already limits the outlook of the ground floor windows. The rear projection of the Firemans Flats is set back 8.2m from the side flank wall of the end mews house which have no windows in the upper floor of the side flank wall to ensure there is no overlooking to the windows in the rear projection of this neighbouring property.

6.7.6 In terms of outlook, existing surrounding residents would experience both actual and perceived changes in their amenity as a result of the development. Nevertheless, taking account of the urban setting of the site and the established pattern and form of the neighbouring development the proposal is not considered to result in an unacceptable material impact on local amenity in this respect.

6.7.7 Therefore, it is considered that residents of nearby residential properties would not be materially affected by the proposal in terms of loss of outlook or privacy.

Other Amenity Considerations

6.7.8 Policy DM23 of the DM DPD states that new developments should not have a detrimental impact on air quality, noise or light pollution.

6.7.9 The submitted Air Quality Assessment (AQA) concludes that the development is not considered to be contrary to any of the national and local planning policies regarding air quality.

6.7.10 It is anticipated that light emitted from internal rooms would not have a significant impact on neighbouring occupiers in the context of this urban area.

6.7.11 Construction impacts are largely controlled by non-planning legislation. Nevertheless, conditions have been imposed requiring details and control over the demolition and construction methodology.

6.7.12 The increase in noise from occupants of the proposed development would not be significant to neighbouring occupants given the current urbanised nature of the surroundings. A condition will be imposed ensuring a noise management strategy is provided.

6.7.13 Therefore, it is considered that the proposal would not have a material adverse impact on the amenity of residents and occupiers of neighbouring and surrounding properties.

6.8 Parking and Highways

6.8.1 Local Plan Policy SP7 states that the Council aims to tackle climate change, improve local place shaping and public realm, and environmental and transport quality and safety by promoting public transport, walking and cycling. This approach is continued in Policies DM31 and DM32 of the DM DPD.

6.8.2 London Plan Policy T1 sets out the Mayor's strategic target for 80% of all trips in London to be made by foot, cycle or public transport by 2041. This policy also promotes development that makes the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport. Policy T6 sets out cycle parking requirements for developments, including minimum standards. T7 concerns car parking and sets out that 'car-free' development should be the starting point for all development proposals in places that are well-connected by public transport. Policy T6.1 sets out requirements for residential car parking spaces.

6.8.3 This site has a Public Transport Accessibility Level (PTAL) of 4, which is considered 'good' access to public transport services. The PTAL value has increased since 2019 with the current iteration of the WEBCAT values. Five different bus services are accessible within 3 to 5 minutes' walk of the site, and Hornsey Railway Station is a 5 to 6 minute walk away. The site is located within the Hornsey South Controlled Parking Zones, which has operating hours of 11.00-13.00 Monday to Friday.

6.8.4 The Metropolitan police use was previously observed to generate some on street parking demands and had number of on street car parking bays allocated for the sole use of police vehicles.

6.8.5 The Council's Transport Planning Officers have considered the potential parking and public highway impact of this proposal.

Access and Parking

- 6.8.6 The proposal seeks access changes that include fully reinstating the existing vehicle crossover off Harold Road and full height kerb and footway provided. Changes to the on street waiting and loading restrictions are also proposed. The applicant will need to enter into the appropriate Highways Act Agreement to cover all of the associated physical works and administrative processes and procedures for the necessary changes. This can be secured by legal agreement.
- 6.8.7 Pedestrian and cycle access to the new units will be possible from the frontages to both Harold Road and Tottenham Lane.
- 6.8.8 No internal facility for receiving delivery and servicing vehicles is proposed. The applicant has proposed conversion of the existing 'Police' bay on Church Lane/Tottenham Lane side of the site to a formal loading bay.
- 6.8.9 The Transport officer notes that in terms of existing parking conditions in the locality of the site the parking stress survey recorded stresses and spare space availability on individual streets within the survey area, and most of the spare/available spaces were located on Harold Road and Tottenham Lane, with others recorded on all the streets within the survey. The Council's Transport Planning Officer notes that although this area is suffering from high car parking pressure based on the worst-case scenario there are a number of spaces available within the local area.
- 6.8.10 The Transport officer notes that the potential parking demand as a result from the proposed development is expected to be lower than predicted in the Transport Assessment given permit free status, a travel plan, car club provision and high-quality cycle parking. Nonetheless, the locality of the site does already experience high parking stresses. A number of measures are appropriate to further reduce the potential car trip and parking demands arising from it, these will include a financial contribution towards improving the accessibility of the site by active and sustainable modes, along with funding a 5-year provision of a car club facility for residents at the development. This can be secured by legal agreement.
- 6.8.11 The Council's Transport Planning Officer notes that whilst it has not been possible to locate the blue badge parking bays within the curtilage of the site, the Council now operates a scheme whereby residents/occupiers can apply to have a designated on street blue badge bay. The proposed arrangement comes from converting the police bays to the blue badge bays and the loading bays. The existing blue badge bay on Harold Road has been retained along with the three new bays proposed for this development. Compared to existing arrangements there will be a light reduction in kerbside 'pay and display' space compared to present. Future occupants of the three accessible units will be able to apply for an on street blue badge bay subject to the relevant criteria. The applicant will need to enter into the appropriate Highways Act Agreement for the provision of the proposed disabled car parking pay. The allocation of the car parking spaces

must be done via a parking management plan. This can be secured by legal agreement. Notwithstanding this, a secure scooter store with charging facility is proposed within the mews street for the three accessible units. Full dimensional details of the intended system/storage to be used and charging facilities can be secured by the imposition of a condition on any grant of planning permission.

Car Free

- 6.8.12 A 'car-free' development is proposed and permits would not be allocated to the new properties for on street parking. Due to the site's public transport accessibility level (PTAL) (4 'good' access to public transport services) the proposed development would therefore be acceptable as a car free development, in accordance with Policy DM32 of the DM DPD. The applicant will need to enter into a legal agreement to secure future parking control.

Cycle parking

- 6.8.13 Long stay cycle parking providing 68 cycle spaces is proposed within the communal cycle parking storage facility provided in block A, B and C to serve the residential flats. The rear gardens of the houses of Block A will accommodate a cycle storage unit for two cycles and the mews houses of Block B would provide an appropriately-sized internal dedicated cycle storage area with supporting locking mechanisms for two cycles. Residential cycle parking is also proposed within the secure communal amenity space. Short stay visitor cycle spaces are proposed on the Church Lane side of the development adjacent to the footway, within the public realm. These will be within the curtilage of this development and not on the public highway.
- 6.8.14 The design and arrangement of all cycle parking will need to meet the requirements of TfL's London Cycle Design Standards.
- 6.8.15 As such, the cycle parking is acceptable subject to the relevant condition being imposed in respect of proposed cycle parking arrangements.

Deliveries and Servicing

- 6.8.16 Delivery and servicing activity will take place on the existing but redundant 'Police' bay in Church Lane that will be converted to an on-street loading bay to service the delivery and servicing demands for this development. The Transport officer notes that the conversion of this bay would be acceptable as there would be no resultant loss of CPZ bays at this location and it would easily meet the demands of this site whilst also providing another loading facility for shops and business and other residential properties in the locality of the site. The applicant will also need to enter into a legal agreement to make any alterations to the highway. In addition, an enhanced delivery and servicing plan to address the issues above will be required. This can be secured by the imposition of a separate condition.

- 6.8.17 In terms of refuse and recycling collection, the bin stores are sited to face the highway for on street collections. The proposed arrangements are considered to be satisfactory and this has been confirmed by the Waste Collection team. Further details can be included in the enhance Delivery and Servicing Plan that will be secured by the imposition of a condition.

Construction Logistics and Management

- 6.8.18 The Transport Assessment includes a brief commentary on the build out of the development. The applicant will need to enter into a legal agreement to monitor the development proposal. A detailed Construction Logistics Management Plan is also required. This can be secured by a legal agreement.
- 6.8.19 6.8.20 Overall it is considered that the application is acceptable in transport and parking terms, and in terms of its impact on the public highway.

6.9 Sustainability, Energy and Climate Change

- 6.9.1 The NPPF requires development to contribute to the transition to a low carbon future, reduce energy consumption and contribute to and conserve the natural environment.
- 6.9.2 London Plan Policy SI2 - Minimising greenhouse gas emissions, states that major developments should be zero carbon, and in meeting the zero-carbon target, a minimum on-site reduction of at least 35 per cent beyond Building Regulations is expected. Local Plan Policy SP4 requires all new developments to introduce measures that reduce energy use and carbon emissions. Residential development is required to achieve a reduction in CO2 emissions. Local Plan Policy SP11 requires all development to adopt sustainable design and construction techniques to minimise impacts on climate change and natural resources.
- 6.9.3 Policy DM1 of the DM DPD states that the Council will support design-led proposals that incorporate sustainable design and construction principles and Policy DM21 of the DM DPD expects new development to consider and implement sustainable design, layout and construction techniques.

Carbon Reduction

- 6.9.4 Policy SP4 of the Local Plan Strategic Policies, requires all new development to be zero carbon. The London Plan 2021 further confirms this in Policy SI2
- 6.9.5 The development achieves a site-wide reduction of 80% in on-site carbon dioxide emissions calculated with Part L 2021. this is achieved through an 81% reduction in the new build dwellings, with a 23% reduction under Be Lean, and an 80%

reduction in the existing building with a 30% reduction under Be Lean. LBH Carbon Management raises no objection to the proposal.

- 6.9.6 The development achieves a site-wide reduction of 80% in on-site carbon dioxide emissions with SAP10 carbon factors calculated with Part L 2021. This is achieved through a 81% reduction in the new build dwellings, with a 23% reduction under Be Lean, and a 80% reduction in the existing building with a 30% reduction under Be Lean.
- 6.9.7 The applicant has proposed a saving of 13.5 tCO₂ in carbon emissions (26%) through improved energy efficiency standards in key elements of the build, based on SAP10 carbon factors for unregulated emissions. The applicant has incorporated improved fabrics for both new built and refurbished parts of the development.
- 6.9.8 In terms of the installation of various renewable technologies, the report concludes that that air source heat pumps (ASHPs) and solar photovoltaic (PV) panels are the most viable options to deliver the Be Green requirement. A total of 28.6 tCO₂ (46%) reduction of emissions are proposed under Be Green measures.
- 6.9.9 The shortfall will need to be offset to achieve zero-carbon, in line with Policy SP4 (1). The estimated carbon offset contribution (£29,355 (indicative) inclusive of 10% monitoring fee) will be subject to the detailed design stage.

Whole Life-Cycle Carbon Assessments

- 6.9.10 The following is proposed to reduce the whole-life carbon emissions of the buildings; lightweight steel framing system and brickwork, Brick and blockwork infill wall, lightweight steel infill system, Substituting cement with less carbon-intensive cement replacement products, such as fly ash or PFA, the use of recycled bricks and locally sourcing them.

Circular Economy

- 6.9.11 In terms of Circular Economy the principles used for this development are as follows;
- Designing for longevity, circa 50 years of building life, and disassembly at end of life
 - Designing for flexibility and adaptability of open spaces and commercial spaces
 - Retaining and refurbishing Grade II listed buildings
 - Demolishing and recycling industrial/retail units
 - Minimise operational waste and provide adequate space for recycling

Overheating

6.9.12 The applicant has undertaken a dynamic thermal modelling assessment in line with CIBSE TM59 and TM52 with TM49 weather files, and the cooling hierarchy has been followed in the design.

6.9.13 The development would not overheat based on the London weather centre files this is based on a series of mitigating measures being built into the development including; closed windows, mechanical ventilation heat recovery with extract fans, and glazing – u-value of 1.2 W/m²K, g-value of 0.25. The applicant has confirmed that external shading will form part of the overheating mitigation strategy. External shading will help reduce the overheating risk and ventilation demand. The shutters will be integrated into the windows.

6.9.14 An updated overheating report will need to be submitted to confirm the overheating mitigation strategy in the Overheating Assessment as well as future mitigation measures however the Council's Carbon Officer is satisfied this can be adequately addressed at a later stage, and as such this matter can be secured by condition.

Summary

6.9.15 The proposal satisfies development plan policies and the Council's Climate Change Officer supports this application subject to the conditions as this scheme will be retrofitting the existing building and build new residential dwellings around this, at a high standard. As such, the application is considered acceptable in terms of its sustainability.

6.10 Urban Greening, Trees and Ecology

6.10.1 Policy G5 of The London Plan 2021 requires major development proposals to contribute to the greening of London by including urban greening as a fundamental element of site and building design. London Plan Policy G6 seeks to manage impacts on biodiversity and aims to secure biodiversity net gain.

6.10.2 Policy SP11 of the Local Plan promotes high quality landscaping on and off-site and Policy SP13 seeks to protect and improve open space and providing opportunities for biodiversity and nature conservation.

6.10.3 Policy DM1 of the DM DPD requires proposals to demonstrate how landscape and planting are integrated into the development and expects development proposals to respond to trees on or close to a site. Policy DM21 of the DM DPD expects proposals to maximise opportunities to enhance biodiversity on-site.

6.10.4 London Plan Policy G7 requires existing trees of value to be retained, and any removal to be compensated by adequate replacement. This policy further sets

out that planting of new trees, especially those with large canopies, should be included within development proposals. Policy SP13 of the Local Plan recognises, “trees play a significant role in improving environmental conditions and people’s quality of life”, where the policy in general seeks the protection, management and maintenance of existing trees.

Urban Greening Factor

6.10.5 The urban greening factor (UGF) identifies the appropriate amount of urban ‘greening’ required in new developments. The UGF is based on factors set out in the London Plan such as the amount of vegetation, permeable paving, tree planting, or green roof cover, tailored to local conditions. The London Plan recommends a target score of 0.4 for developments which are predominately residential. An assessment of the Urban Greening Factor (UGF) has been provided by the applicant based on the surface cover types. The existing site currently comprises of impermeable hardstanding. The proposed development would include permeable paving, amenity grassland, rain gardens, planters, trees, shrubs, green wall, hedges and an intensive green roof. The site currently has an urban greening factor of 0.0 and the proposed development achieves an urban greening factor of 0.43 which exceeds the minimum target set out in the London Plan. This is a significant urban greening improvement as required by London Plan Policy. The final details of landscaping can be secured by the imposition of a condition to secure a high-quality scheme with effective long-term management.

Trees

6.10.6 A total of 6 trees of varied species are proposed within the communal amenity space of the development. There are currently no trees on site.

6.10.7 The Council’s Tree Officer has been consulted on the proposal and is supportive of to the proposed species of trees and comprehensive landscaped design which enhances tree cover in the area.

Ecology and Biodiversity

6.10.8 Within the proposed communal amenity space, hedge shrub planting is proposed. Various species of trees are proposed as well as a biodiverse roof with sedum, a mix plant wall and wall climbers to maximise the number of native species assisting with achieving the highest ecological value.

6.10.9 Whilst these measures are acceptable in principle, further information is required in respect of proposed mitigation and enhancement measures. This can be secured by the imposition of a condition on any grant of planning permission.

6.10.10 Therefore, subject to conditions the proposal is acceptable in terms of its impact on trees, ecology and biodiversity, and its provision of urban greening.

6.11 Flood Risk and Drainage

6.11.1 Policy SP5 of the Local Plan and Policy DM24 of the DM DPD seek to ensure that new development reduces the risk of flooding and provides suitable measures for drainage. The site is located within Flood Zone 1 which has the lowest risk of flooding from tidal and fluvial sources. The site boundary falls within a Source Protection Zone for groundwater abstraction. These zones may be at particular risk from polluting activities on or below the land surface.

6.11.2 The applicant has submitted a Flood Risk Assessment and Drainage Strategy report. These have been reviewed by the LBH Flood and Water Management officer who has confirmed that they are satisfied that the impacts of surface water drainage will be addressed adequately. A number of mitigation measures are recommended to address the risk of flooding from surface water, including the inclusion of SuDS and flood resilience/resistance measures. A number of residual flood risks have been identified including blockages of internal building drainage as well as the Thames Water network and water supply infrastructure. These risks can be managed by the design of the site drainage and by regular inspection and maintenance of the public and private sewer and water supply network. Surface water flows from all proposed impermeable areas will be attenuated onsite in a geo-cellular storage tank beneath the central green space area. Flows will be restricted up to and including the 1 in 100 year plus 40% climate change event prior to discharge into the existing public drainage system.

6.11.3 Thames Water raises no objection with regards to water network infrastructure capacity and surface water drainage if the developer follows the sequential approach to the disposal of surface water. Thames Water recommends imposing a condition regarding piling and strategic water main and an informative regarding groundwater discharge, underground water assets and water pressure.

6.12 Air Quality and Land Contamination

6.21.1 Policy DM23 of the DM DPD requires all development to consider air quality and improve or mitigate the impact on air quality in the borough and users of the development. An Air Quality Assessment ('AQA') was prepared to support the planning application and concluded that the site is suitable for residential use and that the proposed development would not expose existing residents or future occupants to unacceptable air quality. It also highlighted that the air quality impacts from the proposed development during its construction phase would not be significant and that in air quality terms it would adhere with national or local planning policies.

6.12.2 The proposed development is considered to be air quality neutral however the applicant is required to provide an Air Quality Assessment of the proposed

development taking into consideration any change in the site energy source i.e. so as to be able to reach an informed decision on its significant effects on the proposed development site and the overall local air quality. The Council's Lead Pollution Officer is satisfied this can be adequately addressed at a later stage, and as such this matter can be secured by the imposition of a condition.

- 6.12.3 Concerns have been raised about construction works however, these are temporary impact and can be mitigated through provision of the construction management plan which will include air quality control measures such as dust suppression. The proposal is not considered an air quality risk or harm to nearby residents, or future occupiers. The proposal is acceptable in this regard.

Land Contamination

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

- 6.12.5 A report was carried out by Landmark Information and accompanies the application submission. The Assessment concludes from a review of the relevant findings, that the proposed site is likely to be suitable for a residential development, subject to further detailed investigation and any subsequent recommended remedial works that may be required for the proposed end use secured by condition. The Council's Pollution Officer raises no objections.

6.13 Fire Safety

- 6.13.1 Policy D12 of the London Plan states that all development proposals must achieve the highest standards of fire safety. To this effect major development proposals must be supported by a fire statement.

- 6.13.2 The Fire Statement submitted with the application confirms that the ground floor will have building entry points and escape stair cores. As the Mews Street service road to the north of the development does not meet the width requirements to be considered as a Fire Service access road, it is proposed to provide sprinkler protection.

- 6.13.3 The site is accessed via existing roads. Fire appliance access will be on Tottenham Lane and Harold Road. Where bollards are installed to restrict general vehicle traffic, these should be removable to allow emergency vehicles access.

- 6.13.4 The London Fire Brigade has confirmed that there are no objections to the application in respect of fire safety.

6.13.5 Haringey Building Control has been consulted on this application and has confirmed that they are satisfied with the proposals. A formal detailed assessment will be undertaken for fire safety at the building control stage.

6.14 Employment

6.14.1 Local Plan Policies SP8 and SP9 aim to support local employment, improve skills and training, and support access to jobs. The Council's Planning Obligations Supplementary Planning Document (SPD) requires all major developments to contribute towards local employment and training.

6.14.2 There would be opportunities for borough residents to be trained and employed as part of the development's construction process. The Council requires the developer (and its contractors and sub-contractors) to notify it of job vacancies, to employ a minimum of 20% of the on-site workforce from local residents (including trainees nominated by the Council). These requirements would be secured by legal agreement.

6.14.3 As such, the development is acceptable in terms of employment provision.

6.15 Conclusion

- The proposal would result in the loss of a community / civic facility in the form of a Police Station. However, the loss of the Police Station forms part of a wider strategic Metropolitan Police programme that results in the disposing of existing Police Stations whilst not impacting on police services that are required to meet the needs of the local population.
- The development would bring back into use a redundant site which has been vacant for a number of years with a high-quality residential development which responds appropriately to the local context and is supported by the Quality Review Panel.
- The development would provide a total of 29 residential dwellings, contributing towards much needed housing stock in the borough.
- The development would provide 19.4% on-site affordable housing by habitable room in the form of 8 flats for London Affordable Rent, which is the main low cost affordable rented housing that the GLA currently expects to fund all within block C.
- The proposed development will lead to a very low, less than substantial harm to the significance of the Conservation area and its assets that is outweighed by the several significant public benefits of the development. The remainder of the scheme is considered to preserve the character and appearance of the conservation area
- The size, mix, tenure, and quality of accommodation are acceptable and either meet or exceed relevant planning policy standards. A majority of the dwellings have private external amenity space and all dwellings have access onto generous communal amenity space.

- The proposal provides good quality hard and soft landscaping.
- The proposal has been designed to avoid any material harm to neighbouring amenity in terms of a loss of sunlight and daylight, outlook, or privacy, and in terms of excessive, noise, light or air pollution.
- There would be no significant adverse impacts on the surrounding highway network or on car parking conditions in the area;
- The development would be 'car free' and provide an appropriate quantity of cycle parking spaces for this location and would be further supported by sustainable transport initiatives
- The development would provide appropriate carbon reduction measures plus a carbon off-setting payment, as well as site drainage and biodiversity improvements.
- The proposed development will secure several obligations including financial contributions to mitigate the residual impacts of the development.

7.0 COMMUNITY INFRASTRUCTURE LEVY (CIL)

Based on the information given on the plans, the Mayoral CIL charge will be £99,600.65 (1543 sqm x £64.55) and the Haringey CIL charge will be £607,355.66 (1,543sqm x £393.62). This will be collected by Haringey after/should the scheme is/be implemented and could be subject to surcharges for failure to assume liability, for failure to submit a commencement notice and/or for late payment, and subject to indexation in line with the construction costs index. An informative will be attached advising the applicant of this charge.

8.0 RECOMMENDATIONS

GRANT PERMISSION subject to conditions subject to conditions and subject to section 106 Legal Agreement

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Appendix 2 – Plans and images

Aerial view

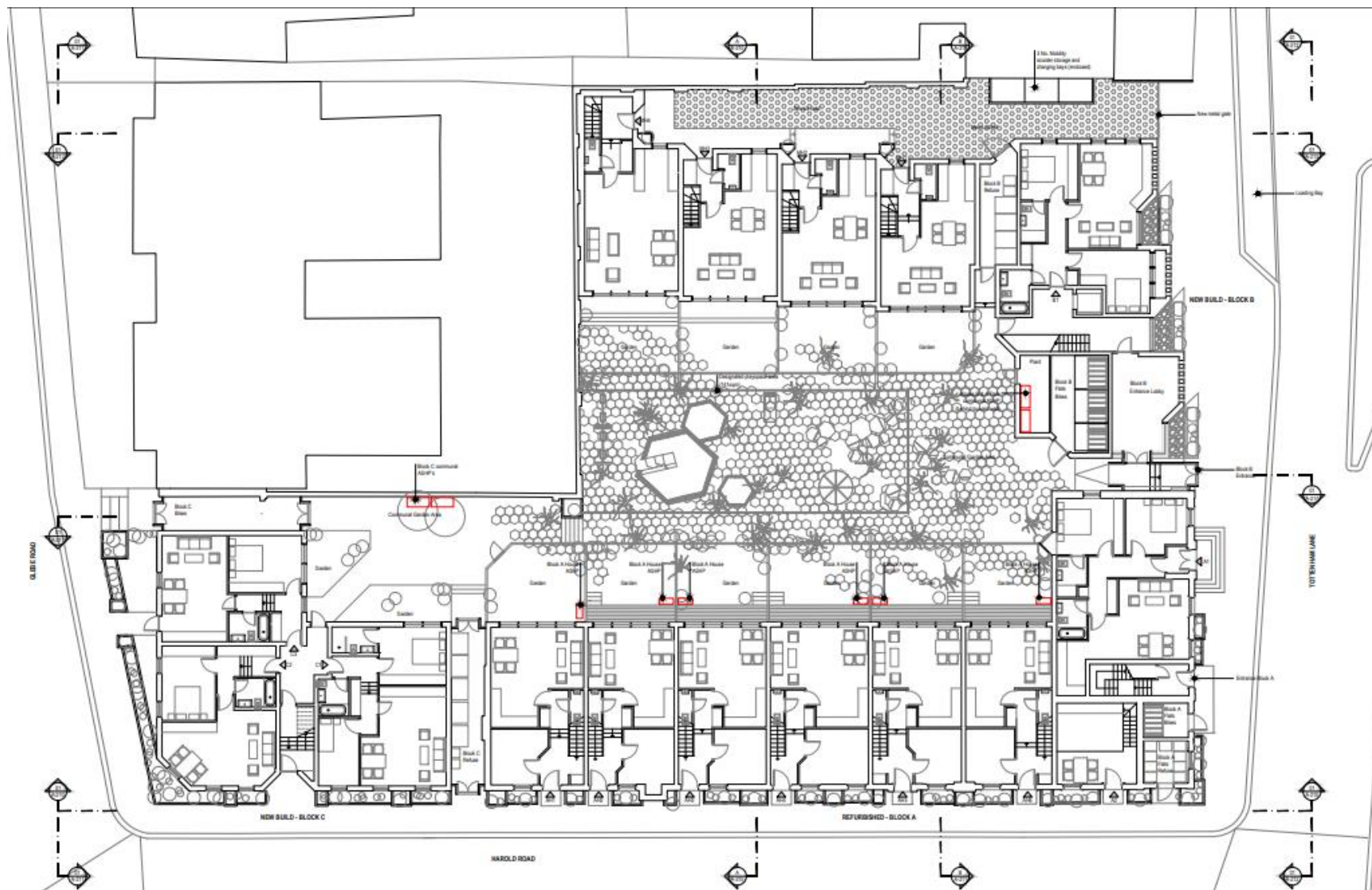


Aerial View Looking West

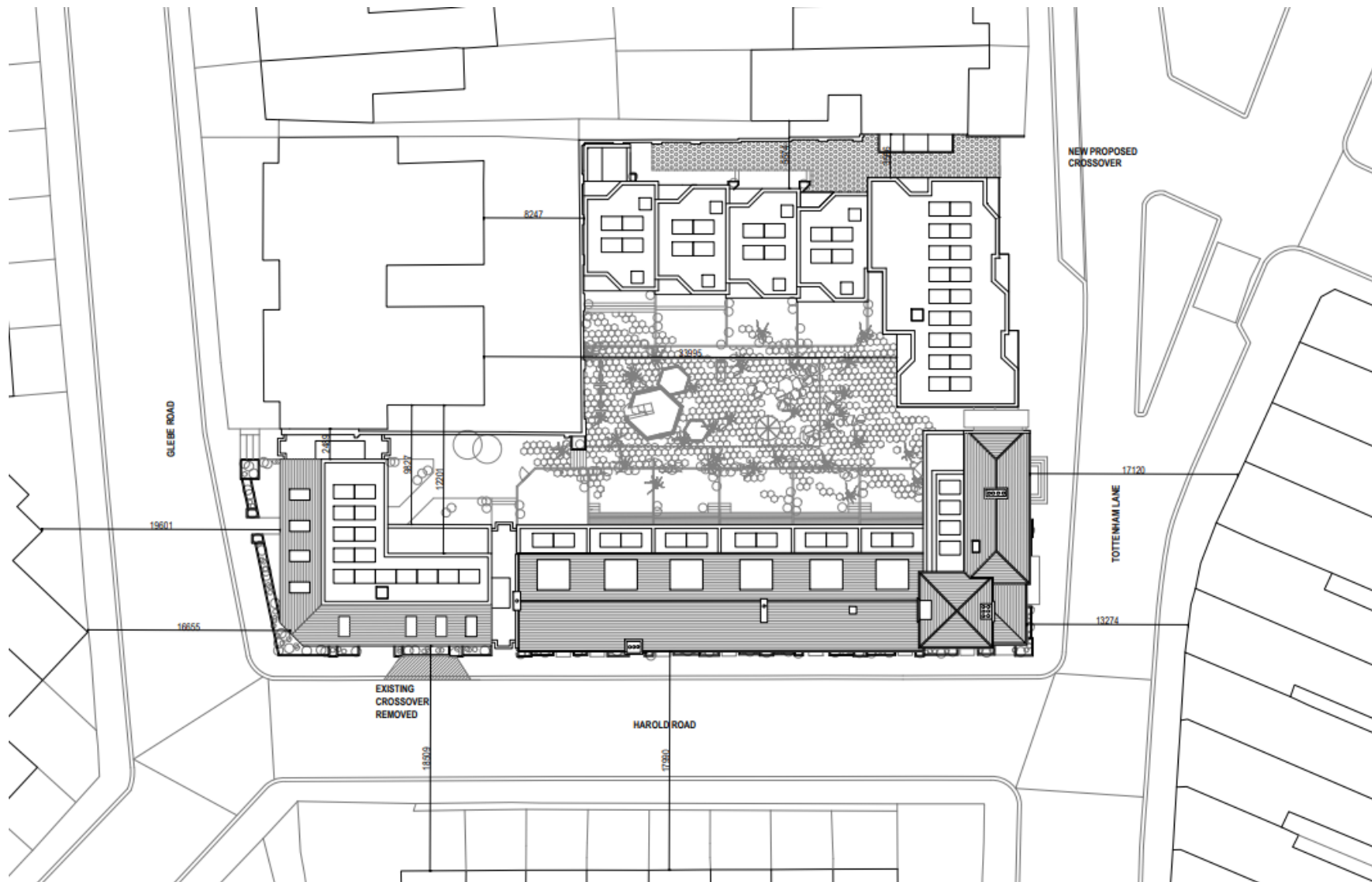


Aerial View Looking East

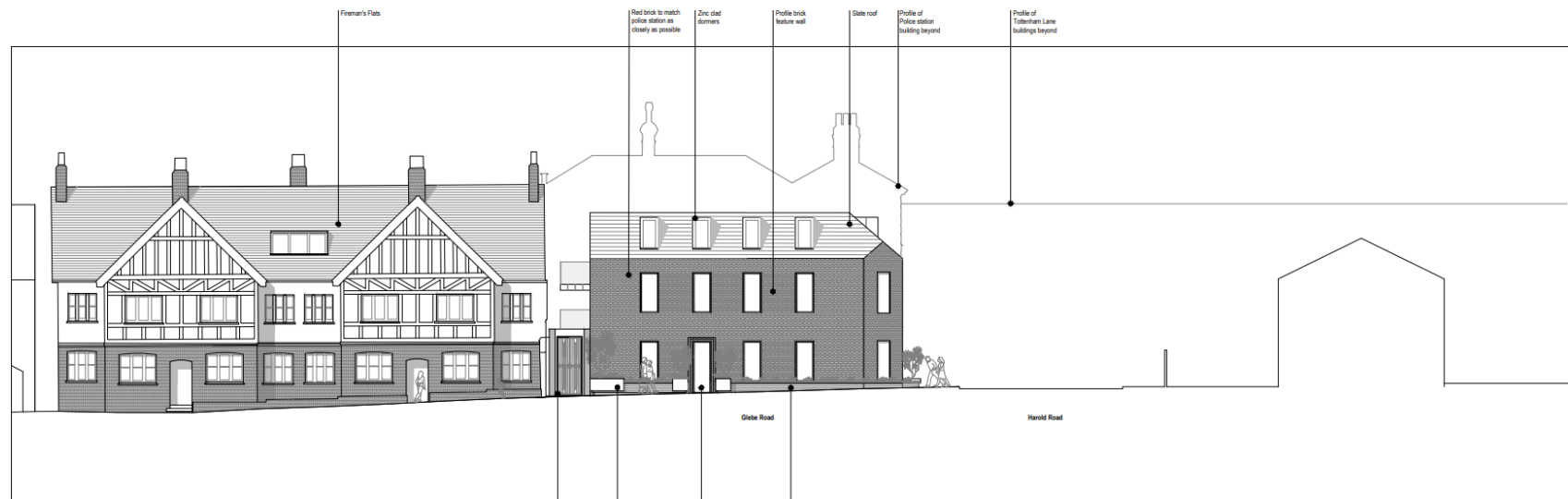
Proposed ground floor plan



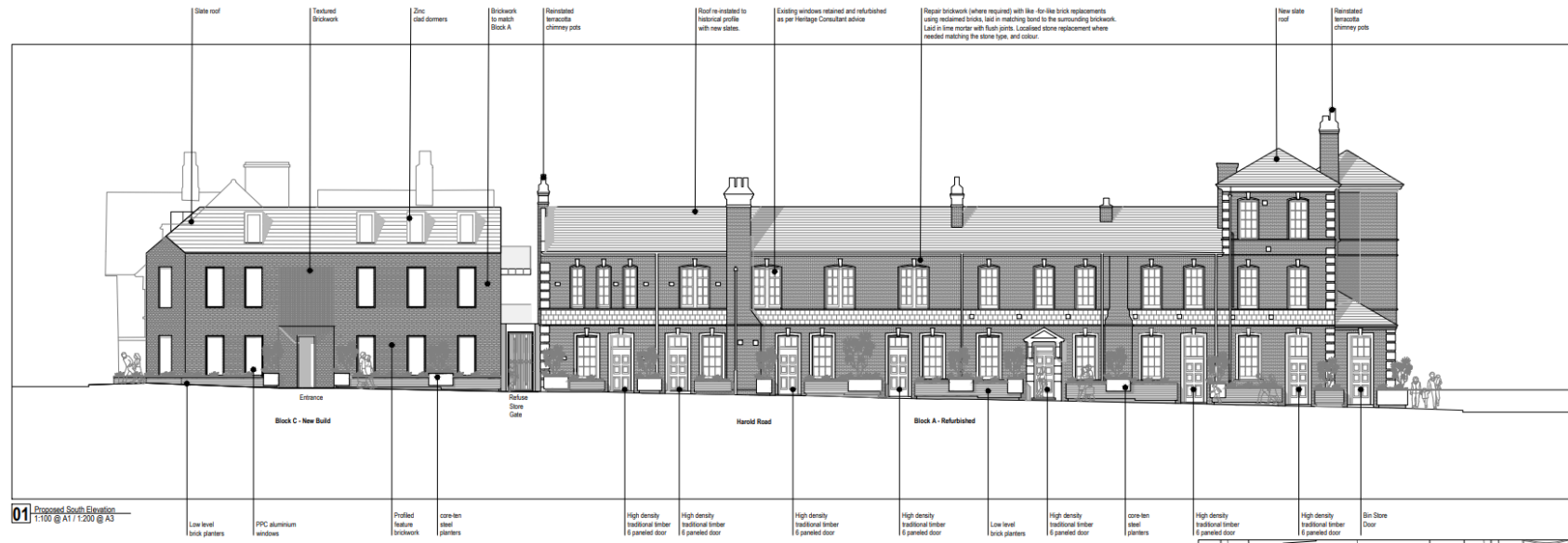
Proposed roof plan



Proposed west elevation



Proposed south elevation



CGI: Tottenham Lane



CGI: Mews Street



CGI: Block C Corner View



CGI: Landscaping



CGI: Nighttime View



Stakeholder	Question/Comment	Response
INTERNAL		
Design	<p>Thank you for asking me to comment, I have been closely involved with this application all the way through the pre-application discussions, Quality Review Panels, and subsequent meetings, and am very familiar with the issues and constraints.</p> <p><u>Summary</u></p> <p>These proposals are a sophisticated and subtle response to what could be a challenging site, that achieves a design of exceptionally high quality, appropriate to context and promising to provide superb new homes. They bring back into use an architecturally notable former police station that acts as a local landmark, positive contributor to the conservation area and marker of a potentially attractive and important urban space. They then fill in the undesirable gaps at either side of the former police station in what promise to be striking, innovative, distinctive and unusual contemporary buildings that are nevertheless designed to complement their locations and settings on appropriate forms for their character. Provided sufficient quality is followed through in the selection of materials, design of details and quality of construction, this proposal has the potential to be an exemplary, award winning new residential development.</p> <p><u>Site Location, Principal of Development</u></p> <ol style="list-style-type: none"> 1. This application is for a site in the Hornsey neighbourhood of the borough of Haringey, just west of the centre of the borough. The site is a former police station, released by the Mayor's Office for Policing and Crime (MOPAC) in early 2021. MOPAC engaged Lambert Smith Hampton and Knight Frank to prepare a sketch proposal for development of the site for residential, and engaged Haringey Council planning department, including this design officer, in a pre-application meeting, following which officers confirmed that the site was considered suitable in principal for this sort of development. MOPAC's sketch proposal was for retention of the main 	Comment noted

	<p>existing building, converted to flats, and infill of new build housing, similar to this proposal, and was used to aid them in selling the site.</p> <p>2. The site is located on the corner of Tottenham Lane, Harold Road and Glebe Road in Hornsey, to the West side of Tottenham Lane / north side of Harold Road / east side of Glebe Road. Tottenham Lane, an important street connecting Crouch End with Wood Green, splits at a small triangular public space in front of the site, with Church Lane continuing north and Tottenham Lane coming from the north-east, and immediately north of the site a row of large two/three storey terrace houses front Church Lane. A two/three storey flatted block known as Firemans Cottages, facing Glebe Road backs onto the north-west corner of the site, with flank walls and garden walls forming the site's northern & part of its western boundary. Tottenham Lane Local centre is located immediately east of the site including a shopping parade along Tottenham Lane opposite, and a further striking curved sopping parade to the north-east, enclosing the triangle where Church Lane splits off from Tottenham Lane, both with commercial units on the ground floor and residential flats on the upper floors.</p> <p>3. The building on site is 'L' shaped in form (including "serifs"!) and comprises a retained part two storey, part three storey building known as Hornsey Police Station, primarily fronting Tottenham Lane, with a long lower wing fronting Harold Road. This was constructed in 1915, in a Baroque style by John Dixon Butler, architect to the Metropolitan Police. It is built in bright-red brick with decorative, molded brick and stone banding and window surrounds, six-over-six pane sash windows and a bold pedimented entrance inscribed 'POLICE'. It replaced an earlier police station of c1868 and originally formed part of a fine group of civic buildings including a public library, demolished in the 1960s after the library was relocated to Crouch End, and a fire station, also demolished, in what's now a gap between the police station building and the houses on Church Lane and at the corner of Harold Road. There are a number of ad-hoc single-storey structures contained within the service yard/car park which is accessed off Harold Road.</p>	
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	<p>4. The site is located within the Hillfield Conservation Area, which also includes the Firemans Cottages and all the other properties on Harold Road, but no other properties or spaces on Tottenham Lane, Church Lane or Glebe Road. The prominently sited Police Station building together with its tall red brick boundary walls, makes a positive contribution to the character and appearance of this part of the conservation area.</p> <p>5. The site is not a formal Site Allocation, as the whole of the site was in use as an active police station at the time the local plan was drawn up, but The Council agreed in response to the original MOPAC pre-application enquiry that the site is suitable for a residential conversion and infill development. The Conservation Area and heritage significance of the positive contribution made by the existing building are the main constraint on these proposals, and .</p> <p><u>Site Layout, Streetscape Character</u></p> <p>6. The proposals would maintain and restore the main, monumental, original, three-storey police station building on the Tottenham Lane-Harold Road corner, as Block A, and the long, lower, two-storey wing down most of the Harold Road length of that side of the site converted to six townhouses, but demolishes various one and two storey ad-hoc later side extensions and outbuildings. A new four-storey block, Block B, matching the height of the original police station, would fill most of the gap between it and the first house (no. 1, actually converted into a hotel) on Church Lane. A narrow gap separates Block A & B, housing a lower communal entrance, with a wider gap between Block B & the White Lodge Hotel leading to a short private mews street, containing four new townhouses.</p> <p>7. Block C is a new two-storey flatted block at the corner of Harold and Glebe Roads. Narrow gaps between Block C and the two storey existing wing to Block A, and Block C and the existing neighbouring Firemans Cottages, are filled with contrasting, single-storey infills housing refuse and bike stores. The three blocks, together with the two-storey existing wing behind Block A, the new mews houses behind Block B, and the back gardens wall of the neighbouring existing Firemans Flats therefore enclose a large</p>	
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	<p>communal private courtyard amenity space, accessible to all residents of this development, yet secure from outsiders.</p> <p>8. These proposals have a generally excellent, straightforward, direct and clearly legible relationship to the street, with existing and new buildings completely lining the surrounding streets, leaving no spaces that are of ambiguous ownership or purpose, and with front doors to the three flatted blocks, the converted townhouses along Harold Road and two of the ground floor flats (one each in Block A & C), having front doors facing and opening off the street, generally behind short defensible space front gardens, with all stretches of street around the site animated and passively surveilled by at least one front door as well as several ground floor habitable room window, generally to a living room or kitchen.</p> <p>9. The one new street created by this development is the mews street on the northern edge of the site, but this is a very short street, just providing access to the four new townhouses behind Block B. This can be gated to maintain security, but even if entered it could not provide access to the rear of any properties, as the end mews house “wraps around” the end of the mews, which also adds to passive surveillance of the mews street from these houses, as well as all the passive surveillance from the rest of the mews houses and corner flats in lock B, so the only neighbouring property bordering the mews, the White Lodge Hotel at no. 1 Church Lane, has an existing high brick boundary wall.</p> <p><u>Height, Bulk & Massing</u></p> <p>10. The Height, Form, Bulk & Massing of this proposal take strong cues from the immediate surrounding context, which, given that the wider neighbourhood is characterised by consistency of building height, means it also follows closely the wider neighbourhood context. The retained main police station building is if three storeys, but is a tall three storeys, with high floor to ceiling heights, particularly of the ground floor that is also raised some four steps above pavement level. The neighbouring block B matches</p>	
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	<p>its height to its eaves, but using consistent standard floor to ceiling heights and a lower ground floor level, comfortably fits four floors into that height.</p> <p>11. Matching the existing police station's height is appropriate as there was previously a library and fire station of similar height and monumentality to the police station in what later became the gap. It is also appropriate as Tottenham Lane is an important street, with retail activity, busy traffic and regular busses, and what is more, opens out at this point with the modest triangular public space formed by Church Lane splitting off Tottenham Lane, bounded on its other two sides with retail parades. Although the police station holds the corner, the west side of this triangle is currently somewhat weakly enclosed, with the gap and the lower, two storey houses of 1-8 etc Church Lane, albeit that they are larger, grander than normal two storey houses, with raised ground floors, large front-facing gables and inhabited roofs. The height difference between the four storeys of Block B and 1 etc Church Lane will therefore also be a modest one additional storey.</p> <p>12. In bulk and massing, Block B also matches that of the retained Block A, and is similar to those of the shopping parades on Tottenham Lane. Its flat roof is an expression of its contemporaneity, contrasting with the prevalent local pitched roofs locally, but is not completely out of character where some of the shopping parades have high parapets, and even the police station itself has a shallow pitched roof which can barely be seen from the street. It also allows its overall height to remain below those of its neighbours, even those a whole to storeys lower. The mews houses that run off the back of Block B follow its form but step down to three floors, and each house steps down another 300mm or so than the previous one, as the mews street itself gently slopes down, so that the last mews house's height is lower than the Firemans Cottages that back onto the end of the mews.</p> <p>13. Going around the side, into Harold and Glebe Roads, the existing context is generally a more modest two storeys, with a particularly modest 1970s terrace on the opposite side of Harold Road and two storey Edwardian</p>	
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	<p>houses on Glebe Road, albeit with inhabited roofs, front facing dormer windows and in the case of the immediately adjacent Firemans Cottages, large front-facing gables. The retained rear wing along Harold Road is also of two storeys, and therefore the new Block C on the corner of Harold and Glebe Roads, at two storeys, with modest minimalist front facing dormer windows, modestly matches the neighbours' height, bulk and massing. This also appropriately expresses the more residential, side street character of Harold and Glebe Roads. The bulk and height of the proposals onto the internal private communal courtyard reflects those of their street frontages, except that the two storey existing and proposed Harold and Glebe Road frontages become three storey to their rear, but this is essentially a private experience.</p> <p><u>Block & House Form, Rhythm & Fenestration</u></p> <p>14. With a large part of the development existing retained buildings, the dominant block and house form from the key corner of Tottenham Lane to most of its length along Harold Road is the monumental existing police station, with its regularly spaced identical, vertically proportioned sash windows interspersed with tall, decorated doorways. The applicants have chosen to emphasise their retention by designing the two new blocks to contrast with the existing in their detailed design, whilst following their height, bulk and aspects of their rhythm and proportions, and to do this in two contrasting manners that express their different locations and contexts. Block B, facing Tottenham Lane and the triangular public space, is designed following a “weaving” concept that celebrates its location on a vibrant place in the public realm, whereas Block C follows a “minimalist” design respectful of its quiet residential hinterland street location.</p> <p>15. The “Weaving” concept takes design inspiration from template patterns from Victorian looms, a design concept from the age of the construction of the police station and its surroundings, but uses it in a totally contemporary design that nevertheless maintains the richness of decoration and detail and animation to the street front found in other residential buildings along Tottenham Lane and other Victorian-Edwardian high streets. The</p>	
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	<p>“chequerboard” effect references and emulates the scale of the projecting porches, bay windows and dormers of surrounding Edwardian residential terraces and retail parades, whilst the overall composition is organised into three bays, matching the rhythm of the terraces of houses and retail parades. The chequerboard composition incorporates staggered balconies and planters to provide privacy to habitable rooms, further variation and greening opportunities, whilst the window pattern is predominantly of tall, thin windows matching those of the existing police station. The design approach is continued into the mews houses, where it further helps provide privacy to residents whilst providing passive surveillance.</p> <p>16. The “Minimalist” design of Block C provides a far more calm, restful, domestic, side-street approach, with windows again matching the existing building but in a regularly spaced pattern. The communal entrance is marked by a deep angled brick recess with patterned brickwork above, animating Block C’s southern elevation, and with a corresponding but more modestly detailed front door to the ground floor flat animating its western elevation. The corner is simply faceted, with a mini gable addressing the diagonal route Harold Road takes after the Glebe Road junction. The roof, including its dormer windows, aligned with the main windows below, is in contrasting slate colour typical of the neighbourhood, but again detailed minimally with a secret gutter.</p> <p>17. There is a fourth family of architectural forms in the development, after the existing Block A, woven Block B and minimalist Block C, in the “gateway-type” objects that fill the gaps. A tall, thin, between A & B provides the entrance to Block B and an entrance and view through to the central courtyard, and allows the level differences between pavement level and internal floor levels to be resolved. A second, between Blocks A and C, and a third between Block C and the neighbouring Firemans Cottages, provide refuse and cycle stores respectively. Each are designed to be robust metallic objects, in contrast to the brick of the existing and new buildings, and can be seen as of the same family as the gate over the mews entrance between Block B and no. 1 Church Lane. They also</p>	
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	<p>provide roof terraces to the adjacent flat, and those in Block C also feature an additional cantilevered glass balustraded balcony to the adjacent second floor flat, between the two gables.</p> <p>18. Finally, to the courtyard, to which all blocks face and open out in different ways but providing equal access to this shared communal private resource (albeit that the four flats converted from the main building of the police station would use fobs). All the new family houses, whether the four new ones in the mews street or the six converted from the rear wing to the Police Station, have generous private gardens, off which their family living-dining-kitchens open, as well as first &/or second floor balconies look down onto, which then open not the communal garden, whilst the communal entrances to Blocks B and C continue directly through to the communal courtyard, incidentally also providing a glimpse of this green oasis from the street.</p> <p><u>Materials & Detailing</u></p> <p>19. Brick is the dominant material, and will be a consistent red brick to match both the existing police station and other neighbouring buildings, so it should be a warm red brick with some moderate variation. It will, however, need to be conditioned, to be agreed before construction in consultation with Officers, as is to be expected. But the brick is detailed differently in each of the three blocks.</p> <p>20. Block A, the converted existing, is a sensitive conversion to the front and side facing the street, with existing doors retained and used for flat entrances, bins and bike doors, and new doors sensitively inserted were required to the Harold Road side only to match existing in place of existing windows. Whilst the rear of Block A has greater modifications to replace removed outbuildings and lean-tos and provide sufficient residential accommodation, garden patio doors, a 2nd floor roof terrace for one of the flats and privacy between flats and houses in the internal corner; new build elements at the rear are detailed simply and plainly to not compete with the retained existing elements.</p>	
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	<p>21. To Block B and the mews houses, the “weaving” pattern is expressed in projecting and recessed brick panels, some in patterned “hit & miss” brickwork, especially to the ground floor street frontage, to provide a robust, “rusticated” base, to give privacy to habitable room windows, especially bedrooms, and so the first floor windows read as matching the ground floor windows of the retained police station. Careful detailing of communal entrance, overhangs, projections, parapets, soffits, balcony and planter edges will be required and large scale (1:10 or 1:5) details of these should be required by condition.</p> <p>22. Block C is detailed to be “minimalist”; using the same brick but with an invisible gutter and plain, slender cheeked metallic dormer windows. The metallic “gate-like” structures in the gaps between blocks will also require their metal and glass components to be specified and shown to be sufficiently functional and robust to suit their purpose, where impact damage and privacy concerns are a factor. Roof material is also to be decided, and large scale (1:10 or 1:5) bin store, bike store, balcony, gutter, ridge, dormer window and balcony details should be required to be conditioned.</p> <p><u>Residential Quality (flat, room & private amenity space, size, quality, privacy and aspect)</u></p> <p>23. All maisonette, flat and room sizes comply with or exceed minima defined in the Nationally Described Space Standards, as is to be routinely expected. All flats and houses are at least dual aspect, many triple, all with at least one sunny southerly or westerly aspect</p> <p>24. Generous private gardens are provided to all houses, and balconies are provided to most flats, but many are north-facing, not all are of sufficient size to meet London Plan requirements, this has not been some flats to the retained converted existing building and to the outside corner of Block A, where the only possible place for a private balcony would overlook the street. However all flats have access to the generous landscaped shared</p>	
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	<p>private communal central courtyard, which provides landscaped relaxation and childrens play space to more than meet needs and requirements.</p> <p>25. The only existing residential neighbours in close proximity are the flats of Firemans Cottages. There will be some overlooking between these flats and the new dwellings, but distances are generally reasonable. One first floor bedroom window and one second floor living room window in the north side of Block C will be some 12m from the side wall of the rear wing of Firemans Cottages, which contains windows at ground and first floor, although they appear to be to kitchens and/or bathrooms. Their main habitable room windows appear to face the street or be east facing in the main building or rear gable of their back projection, which will have a long space of some 42m or 34m respectively. Furthermore, their outlook onto the communal landscaped courtyard will be a considerable improvement on the previous working yard to the police station.</p> <p>26. The layout of the proposals is also careful to avoid overlooking between homes within the development with the narrowest distance between windows or balconies across the communal courtyard being over 18m, which is considered to be the maximum distance at which a face can be recognised, and is therefore considered sufficient distance to confer privacy. Furthermore, windows close to internal corners are avoided to avoid flanking privacy concerns. Considering the density of residential accommodation in and around the site and the complexity of this design, it is further testament to the quality and sophistication of this proposal that it creates no privacy concerns.</p> <p><u>Daylight and Sunlight</u></p> <p>27. Of relevance to this section, Haringey policy in the DM DPD DM1 requires that:</p> <p><i>“...D Development proposals must ensure a high standard of privacy and amenity for the development’s users and neighbours. The council will support proposals that:</i></p>	
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	<p>a. <i>Provide appropriate sunlight, daylight and open aspects (including private amenity spaces where required) to all parts of the development and adjacent buildings and land;</i></p> <p>b. <i>Provide an appropriate amount of privacy to their residents and neighbouring properties to avoid overlooking and loss of privacy detrimental to the amenity of neighbouring residents and residents of the development...</i></p> <p>28. The applicants provided Daylight and Sunlight Report on their proposals and of the effect of their proposals on neighbouring dwellings. These have been prepared fully 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, 2022), known as "The BRE Guide".</p> <p>29. The assessment finds that the impact of the development on existing neighbouring residential properties is very favourable for both daylight and sunlight, with only two windows and no rooms to neighbouring existing residential properties found to lose a noticeable amount of daylight, and no neighbours losing a noticeable amount of sunlight. This can be considered an exceptionally benign impact on neighbours, given that much of the site has been an open air car park and yard for many years, giving those existing neighbours better day and sunlight than Londoners would normally expect.</p> <p>30. The applicants' assessment also finds that all the proposed dwellings in the development would achieve good levels of daylight to the proposed dwellings. This again is an exceptionally good result, given that most new developments in London struggle to reach the BRE Guide standards, which are written with low density, suburban patterns of development in mind. Therefore, full compliance with the BRE Guide is not to be expected and the fact that it is achieved here is considered an excellent performance.</p>	
Conservation	Comments dated 28/10/2022	Comment noted

	<p>Built Heritage Advice pertaining to an application for: Retention of existing Police Station building (Block A) with internal refurbishment, rear extensions and loft conversions to create 6 terrace houses and 4 flats. Erection of two buildings comprising of Block C along Glebe Road and Harold Road to create 8 flats and erection of Block B along Tottenham Lane and towards the rear of Tottenham Lane to create 7 flats and 4 mews houses including landscaping and other associated works.</p> <p>The proposed development site (the Site) is located within the Hillfield Conservation Area and is occupied by Hornsey Police Station, which is no longer in use.</p> <p>After the junction with Glebe Road, fronting Tottenham Lane, Hornsey Police Station is a three-storey building constructed in 1915 in a Baroque style to the designs of John Dixon Butler, architect to the Metropolitan Police. It is constructed of red brick with terracotta banding and window surrounds, six-over-six sash windows and a bold pedimented entrance inscribed 'POLICE'. It replaced an earlier police station of c.1868 and originally formed part of a fine group of civic buildings including a public library, demolished in the 1960s after the library was relocated to Crouch End, and a fire station, also demolished.</p> <p>The Site is considered to make a positive contribution to the streetscape and wider conservation area. Whilst new-build development on the Site is supported, how it fits into its surrounding historic environment will be key to its success.</p> <p>The amended proposals have largely addressed the concerns previously cited by the Council's Conservation Area. However, it is not considered that the amendments to the design of Block B fronting Tottenham Lane are sufficient to overcome concerns that the frontage may appear alien in its surroundings.</p>	
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	<p>The proposed design, whilst well-designed and articulated, is overly-busy when considered in the immediate environs of Hornsey Police Station and would detract from its prominence and visual dominance within the streetscape and wider conservation area.</p> <p>As such, it is considered that the proposals fail to preserve or enhance the character and appearance of the Hillfield Conservation Area, contrary to Paragraph 206 of the National Planning Policy Framework (NPPF).</p> <p>A simpler frontage which is visually subservient to the adjacent police station mitigate the adverse impact on the heritage asset.</p> <p>As such, it is considered that the proposals fail to preserve or enhance the character and appearance of the Hillfield Conservation Area, contrary to Paragraph 206 of the National Planning Policy Framework (NPPF).</p> <p>Comments dated 03/07/2023</p> <p>The amendments to Block C are welcome and it is now considered to preserve the character and appearance of Hillfield Conservation Area, in compliance with Paragraph 206 of the NPPF.</p> <p>In terms of Block B, it is my view that the harm would be 'less than substantial', making Paragraph 202 of the NPPF relevant. If we consider this harm in the scale of lower, middle, and upper, it is my view that the harm to the heritage asset would be at the lower end of the scale.</p> <p>With the exception of the low levels of 'less than substantial' harm arising from Block B, the remainder of the scheme is considered to preserve the character and appearance of the conservation area.</p>	
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	Overall, I consider paragraph 202 to be engaged and so the LPA must weigh the public benefits of the proposals against the low levels of less than substantial harm .	
Transportation	<p>This application seeks to redevelop the redundant police buildings at this site for a residential development comprising 29 units.</p> <p><u>Location and access</u> This site is located on the corner of Harold Road and Tottenham Lane in Hornsey, to the north side of Harold Road/West side of Tottenham Lane.</p> <p>It currently has a PTAL of 3, considered 'moderate' access to public transport services. 5 different bus services are accessible within 3 to 5 minutes' walk of the site, and Hornsey Railway Station is a 5 to 6 minute walk away.</p> <p>It is however noted that the 2019 PTAL value of the site is detailed as level 4, looking at the outputs from TfL's WEBCAT website, it does appear that the difference in value is from a reduction in reported train services calling at Hornsey station. The PTAL report for 2021 doesn't include services running to Stevenage, however checking the Great Northern timetable, services to Stevenage do operate to and from Hornsey and therefore it could well be that there is an error leading to the reduced PTAL value reported by WEBCAT. A PTAL of 4 is acceptable.</p> <p>The site is also located within the Hornsey South CPZ, which has operating hours of 11.00 to 13.00 Monday to Friday.</p> <p><u>Development proposals</u> The existing buildings comprise a three storey office redbrick corner building fronting on to Tottenham Lane and Harold Road, as well as a two-storey red-brick building along Harold Road. There is also a car parking area internal to the site and highway access off Harold Road.</p>	Observations have been taken into account. The recommended legal agreement clauses and conditions attached.

The Metropolitan police were former occupiers and vacated the buildings in 2021. This use was previously observed to generate some on street parking demands and had number of on street car parking bays allocated for the sole use of police vehicles.

The proposal in this application is to convert the Former Police Station into 4 self-contained flats and 6 Terraced houses (Block A, Three Storeys), and construct a new residential building to contain 7 self-contained flats and 4 houses (Block B, Three Storeys to the rear and Four Storeys fronting Tottenham Lane) and a third building that will house 8 Flats (Block C 3 Storeys).

The breakdown of units is as follows;

- 6 No. 1 bedroom flats
- 11 No. 2 bedroom flats
- 2 No. 3 bedroom flats
- 6 No. 3 bedroom houses
- 4 No. 4 bedroom houses

29 new residential units in total.

There is no onsite car parking proposed, the applicant has provided (long and short stay) cycle parking to meet the requirements of the London Plan.

Transportation considerations

This is a 29 unit residential proposal, proposed as a car free development. A Transport Assessment accompanies the application, and there are a number of transportation characteristics to consider and discuss. These are as follows;

Access arrangements

As commented earlier, this is proposed as a car free development, so the existing vehicle crossover off Harold Road will be able to be fully reinstated and full height kerb and footway provided. Changes to the on street waiting and loading restrictions are also proposed and these are discussed later in this response. The

	<p>applicant will fund these changes and enter into a Section 278 Agreement with the Highway Authority to cover all of the associated physical works and administrative processes and procedures for the necessary changes.</p> <p>Pedestrian and cycle access to the new units will be possible from the frontages to both Harold Road and Tottenham Lane.</p> <p>There will be no internal facility for receiving delivery and servicing vehicles. The applicant has proposed conversion of the existing 'Police' bay on Church Lane/Tottenham Lane side of the site to a formal loading bay.</p> <p><u>Proximity to local shops, services and facilities</u></p> <p>The TA details the facilities that within walking distance of the site, it is considered that the site is quite well placed for foot access to local shops, services and facilities.</p> <p>Hornsey High Street and Crouch End are accessible within around 8 and 12 minutes walk of the site, and banks, pharmacies, GP's, schools and local parks are within or less than this walk time/distance from the development, many within 8 to 10 minutes walk.</p> <p>There are informal pedestrian crossing facilities in the locality of the site, in particular a raised table crossing of Church Lane which is on the foot route from the site towards Hornsey Station. In terms of formal cycling facilities in proximity of the site, there are on carriageway cycle lanes along parts of Tottenham Lane and signage directing towards LCN 7.</p> <p><u>Parking considerations</u></p> <p>As commented earlier this is proposed as a car free development. It is expected that additional parking demands will be generated by this proposal, given there will be 29 new units, and that 12 will be 'family sized' as in 3 or 4 bedrooms. The development proposal will require the implementation of 3 disable car parking</p>	
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	<p>spaces on the public highways for the use of the development this is covered later in the report.</p> <p><u>Existing parking conditions in the locality of the site</u></p> <p>The applicant has included the results of a parking stress survey within their TA. This was carried out to accord with the requirements of the 'Lambeth' methodology.</p> <p>The results were considered for the standard 5m car length and for a 6m car length sensitivity which represents the worst case scenario.</p> <p>The stresses recorded within the survey area over two nights varied from 81.2% based on a 5m car length, to 86.8% when considering a 6m car length. Generally, once a parking stress is recorded in the range of 85% plus it is considered that an area is 'stressed' in parking terms.</p> <p>The survey also recorded the overall numbers of available spaces within the survey area, which is another consideration alongside the parking stress level. There were 82 spaces available out of the 437 in the survey area on average (5m car length calculation) and 54 spaces if considering a 6m car length.</p> <p>The survey recorded stresses and spare space availability on individual streets within the survey area, and most of the spare/available spaces were located on Harold Road and Tottenham Lane, with others recorded on all the streets within the survey. We have therefore concluded that although this area is suffering from high car parking pressure based on the worst case scenario there are a number of spaces available within the local area.</p> <p><u>Potential parking demands</u></p> <p>The 2011 census recorded average car ownership per household within the Hornsey Ward at 0.59 vehicles per household. Whilst it is acknowledged that car ownership has declined since this census, with the family sized houses and flats in particular there would be new parking demands expected to materialise.</p>	
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	<p>The TA predicts (based on the historic census information) that new car parking demands for potentially 19 vehicles will materialise. However, the actual figure for potential new parking demands is expected to be lower than 19 cars for several reasons.</p> <p>Firstly, the whole development will be formally permit free and car free via S106, so no permits would be issued to occupiers. Whilst the CPZ is only in force for two hours a day, this would to a degree acts as a deterrent.</p> <p>Secondly, high quality cycle parking and good proximity to local shops and services would likely drive down the demands for car usage and ownership.</p> <p>Thirdly, there will be a travel plan, and this includes measures such as personalised travel planning, provision of information on public transport, walking and cycling routes, and associated with the Travel Plan will be a car club facility, which are known to reduce vehicle ownership and private car journeys when provided for new developments.</p> <p>The welcome pack for new occupiers will also include a £200 Voucher than can be used for purchase of or towards healthy lifestyle and active travel equipment such as walking and cycling accessories and the like. The Travel Plan also proposes provision of two travel Zones 1 to 6 travel cards for each residential unit for a year to encourage and embed use of public transport.</p> <p><u>Potential increases in parking stress</u></p> <p>The TA considers an uplift of 19 vehicles seeking to park in the locality of the site, and details that (based on a 5m car length) stresses could increase from 81.2% to 86.9%, which would result in 57 spaces remaining available within the 200m walk distance of the site. If considering the 6m sensitivity, stresses would increase to 92.9% with 29 spaces remaining available. These figures also include an anticipated 7 additional on street demands arising from recently consented applications in the locality that could add to local parking stresses.</p>	
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	<p>As commented earlier Transportation do consider that the likely new demands that could arise should be lower than the 19 vehicles predicted by the TA which is considering a 'worst case' scenario.</p> <p><u>Blue badge parking</u></p> <p>There are three accessible units within the development, this aspect with respect to parking is discussed below.</p> <p>The London Plan details that accessible units should be provided with 3% parking from the outset and the development should have the ability to provide 10%, i.e., a blue badge parking space for each residential unit. The Plan also comments that disabled parking for accessible units must be for resident's use only.</p> <p>Ideally, the blue badge parking provision for the accessible units at this development would be located within curtilage. With the initial iteration of this development during the pre-application process this was the case, however as the project developed the amenity space considerations and advice from QRP steered the development towards being a car free proposal.</p> <p>Initially concerns about not locating the blue badge parking for the disabled units within curtilage arose as they would not have been able to be allocated as per London Plan requirements to these occupiers. Also, the demands being on street would take up on street bays.</p> <p>However, Haringey now operate a scheme whereby residents/occupiers can apply to have a designated on street blue badge bay. There are requirements relating to status and levels of PIP/DLA received. Occupiers of the three accessible units will be able to apply should they meet the criteria, and the applicant enters into a S.278 agreement for the provision of the proposed disable car parking pay. The allocation of the car parking spaces must be done via a parking management plan, which must be submitted to the Council for approval before the development is occupied.</p>	
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	<p><u>Secure scooter storage for accessible unit occupiers</u></p> <p>The applicant is also going to provide within curtilage secure scooter charging and storage.</p> <p>An external secure scooter store/charging facility has been proposed for location within the gates of the Mews area to the development. The updated proposed ground floor plan in Annexe 2 shows these located to the north east corner of the site.</p> <p>No details of the proposed unit are provided, and the commentary in this note doesn't detail how these are located with respect to the location of the accessible units within the development.</p> <p>Assuming these are to be located in the optimum position for the occupiers of the accessible units, full dimensional details of the intended system/storage to be used and charging facilities will need to be clarified and confirmed, and this can be done by condition.</p> <p><u>Summary of car parking considerations</u></p> <p>With a PTAL level of 4 this development does meet the criteria of policy DM32 for formal designation as a car free/permit free development. Should this development eventually be consented and built out, it will be appropriate that it is formally designated as car free/permit free and the applicant will need to enter into a S.106 legal agreement to formalise this and meet the Council's administrative costs.</p> <p>This development will create additional on street parking demands compared to present, the TA details this could be up to 19 vehicles however it is expected the actual demands will be lower given permit free status, a travel plan, car club provision and high quality cycle parking. Nonetheless, the locality of the site does already experience high parking stresses so transportation do consider and recommend that the applicant provides measures to further reduce the potential</p>	
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	<p>car trip and parking demands arising from it, these will include to make financial contributions towards improving the accessibility of the site by active and sustainable modes, along with funding a 5 year provision of a car club facility for residents at the development.</p> <p><u>Highway changes associated with the development</u></p> <p>The applicant has proposed a revised highway arrangement at the site to suit this new development, which takes into account the reinstatement of the redundant crossover and reconfiguration of the on street waiting and loading arrangements.</p> <p>Associated with the former Police Station operation was a long continuous 'Police' only parking bay running along Harold Road, this has been removed and 'standard' CPZ bays are now in place.</p> <p>The proposed arrangement includes retention of the 'Doctor' parking bay and the provision of 4 blue badge bays, along with conversion of the 'Police' bay on Church Lane to a Loading bay. The existing blue badge bay on Harold Road has been retained along with the three new bays proposed for this development. Compared to existing arrangements there will be a light reduction in kerbside 'pay and display' space compared to present.</p> <p>In order to implement this arrangement, the applicant will need to enter into a S278 agreement with the Highway Team within the Council and meet all of the Council's costs.</p> <p><u>Cycle parking</u></p> <p>To meet London Plan numerical requirements for long and short stay cycle parking, 56 long stay and 2 short stay cycle parking spaces are required. The applicant is proposing 68 long stay and 4 short stay albeit the short stay are not within the development curtilage.</p> <p>For each of the house units in Block A the rear garden of each unit will accommodate a cycle storage unit for two cycles, whilst for each of the house</p>	
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	<p>units in Block B an appropriately-sized internal dedicated cycle storage area with supporting locking mechanisms for two cycles would be provided.</p> <p>For the flats within the development, there will be communal cycle parking storage provided with a store in each block. For blocks A and B two tier storage plus Sheffield Stands that can accommodate larger/oversize cycles will be provided, and for block C it is proposed for a wall mounted cycle parking/storage arrangement.</p> <p>4 Sheffield stands will also be provided within the secure communal garden area for residential cycle parking, the TA comments these could accommodate oversize and larger cycles and would be an additional facility to the Sheffield Stands within the communal storage for blocks A and B.</p> <p>The applicant also proposes provision of two Sheffield Stands for visitor cycle parking, that will be located on the Church Lane side of the development adjacent to the footway, within the public realm. These will be within the curtilage of this development and not on the public highway.</p> <p>The numbers of long and short stay cycle parking spaces do meet the numerical requirements of the London Plan for Long and short stay cycle parking.</p> <p>Full dimensional details demonstrating the proposed arrangements accord with the London Cycles Design Standards as produced by TfL will be required, this can be covered by a pre commencement condition.</p> <p><u>Refuse and recycling storage and collection arrangements</u></p> <p>The bin stores are sited to face the highway for on street collections. It is noted that colleagues within the Council's Waste Management team are supportive of the proposed storage and collection arrangements.</p> <p><u>Delivery and servicing arrangements</u></p>	
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	<p>The applicant is including /proposing that the existing but redundant ‘Police’ bay in Church Lane is converted to an on street loading bay that will be able to service the delivery and servicing demands for this development. This bay is 11.5m in length and its conversion would be acceptable as there would be no resultant loss of CPZ bays at this location and it would easily meet the demands of this site whilst also providing another loading facility for shops and business and other residential properties in the locality of the site.</p> <p><u>Draft Travel Plan</u></p> <p>A draft residential travel plan accompanies the application, this appears sound with respect to the scope and content of it, the objectives and mode share targets which seek to reduce car trips and increase walking, cycling and public transport mode share. It is noted that the 5 year target for cycle trips is 12% which is supported.</p> <p>It is also noted that proposals to provide a £200 voucher for each residential unit for the purchase of active travel related equipment and the like, plus provision of two Zones 1 to 6 travelcards for each unit for a year is included and these initiatives are welcomed as they will contribute towards active and sustainable transport mode change.</p> <p>The implementation of the residential travel plan can be included within the S106 and a monitoring fee of £3000/year for the 5 year life of the travel plan will also be required to cover officer time in supporting the travel plan and reviewing the occupiers’ surveys, updates and other issues during the life of the travel plan.</p> <p><u>Construction Phase</u></p> <p>The TA includes a very brief commentary on the build out of the development, and a full Construction Logistics Plan or similar will be required prior to commencement of the works. This must be covered by a pre commencement condition.</p>	
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	<p>The TA includes reference to details needing to be included such as slot booking for vehicle arrivals and departures, avoidance of vehicles arriving during the AM/PM peaks and school start and finish periods, the suspension of on street parking bays once the existing access can no longer be used for construction access, and materials loading/unloading /handling.</p> <p>In order to manage the build out from the Highways/transportation perspective, the applicant will need to make a contribution of £10,000 to cover Officer time to attend to and oversee/manage all Highways related aspects of the build out, which will include matters such as suspensions of parking bays, licences for temporary arrangements, oversight of temporary arrangements for pedestrians, cyclists and vehicle traffic management, and co-ordination with operational aspects of the highway network such as utilities works, highway maintenance and other development sites in the locality.</p> <p><u>Summary</u></p> <p>This application is for the redevelopment of Hornsey Police Station to provide 29 new residential units. It is proposed as a car free development.</p> <p>There are a number of transportation considerations. Whilst the development will not in itself create any adverse impacts with respect to trip generation and highway/public transport capacities, there will be an increase in local parking stresses resultant from the development, primarily from the family sized units. Local parking stresses are high; however, it is acknowledged that even with an uplift in local demands there will be residual spaces remaining. Nonetheless, it is essential that the development delivers measures to reduce the additional parking demands and encourage the uptake of active and sustainable travel modes.</p> <p>To do this the development will be formally designated as permit/car free under policy DM32, there will be a travel plan, and a car club facility provided for 5 years from occupation. High quality cycle parking will be required, and a pre</p>	
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	<p>commencement condition for submission of detailed drawings for the proposed arrangements will be imposed.</p> <p>It will also be appropriate for the development to make a financial contribution towards improving accessibility of the site by active and sustainable means, and a contribution of £100,000 is considered appropriate for the upgrade of the unsignalized crossing facility on Tottenham Lane/ Church Lane gyratory to provide enhanced pedestrian access to and from the site and the introduction of an east-west cycle route at this location.</p> <p>Finally, given the site's location adjacent to the highway, other residential properties and local shops and businesses, a Construction Logistics Plan will be required for approval prior to commencement of the construction works, to ensure the build out is appropriately managed and potential impacts on the public highway and neighbours are minimised and mitigated.</p> <p>To summarise, this application does have the potential to create an increase in local parking stresses, however the potential highway safety implications that may arise from the development proposal are not considered significant to recommend refusal. As commented, several obligations and mitigation measures will be necessary to make this development acceptable in transportation terms, the Transportation and highways authority has considered fulfilment and provision of these will ensure that the potential impacts are not severe and will make the application acceptable.</p> <p>The following section 106 obligations and conditions will need to be secured as part of the proposed development to ensure that the development proposal complies with the policy requirements of the London Plan, Haringey Local Plan and Haringey Development Management DPD. Subject to the following section 106 obligations and conditions, we have no objection to this development proposal:</p> <p><u>1. Car-Free Agreement</u></p>	
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	<p>The owner is required to enter into a Section 106 Agreement to ensure that the residential units are defined as “car free” and therefore no residents therein will be entitled to apply for a residents parking permit under the terms of the relevant Traffic Management Order (TMO) controlling on-street parking in the vicinity of the development. The applicant must contribute a sum of £4000 (four thousand pounds) towards the amendment of the Traffic Management Order for this purpose.</p> <p>Reason: To ensure that the development proposal is car-free and any residual car parking demand generated by the development will not impact on existing residential amenity.</p> <p><u>2. Car Club Membership</u></p> <p>The applicant will be required to enter into a Section 106 Agreement to establish a car club scheme, which includes the provision of five years’ free membership for all residents and £100 (one hundred pounds in credit) per year/per unit for the first 2 years.</p> <p>Reason: To enable residential occupiers to consider sustainable transport options, as part of the measures to limit any net increase in travel movements.</p> <p><u>3. Construction Logistics and Management Plan</u></p> <p>The applicant / developer is required to submit a Construction Logistics and Management Plan, 6 months (six months) prior to the commencement of development, and approved in writing by the local planning authority. The applicant will be required to contribute, by way of a Section 106 agreement, a sum of £10,000 (ten thousand pounds) to cover officer time required to administer and oversee the temporary arrangements, and ensure highways impacts are managed to minimise nuisance for other highways users, local residents and businesses. The plan shall include the following matters, but not limited to, and the development shall be undertaken in accordance with the details as approved:</p>	
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	<p>a) Routing of excavation and construction vehicles, including a response to existing or known projected major building works at other sites in the vicinity and local works on the highway;</p> <p>b) The estimated number and type of vehicles per day/week;</p> <p>c) Estimates for the number and type of parking suspensions that will be required; and</p> <p>d) Details of measures to protect pedestrians and other highway users from construction activities on the highway.</p> <p>Reason: To provide the framework for understanding and managing construction vehicle activity into and out of a proposed development in combination with other sites in the Wood Green area and to encourage modal shift and reducing overall vehicle numbers. To give the Council an overview of the expected logistics activity during the construction programme. To protect of the amenity of neighbour properties and to main traffic safety.</p> <p><u>4. Residential Travel Plan</u></p> <p>Within six (6) months of first occupation of the proposed new residential development a Travel Plan for the approved residential uses shall have been submitted to and approved by the Local Planning Authority detailing means of conveying information for new occupiers and techniques for advising residents of sustainable travel options. The Travel Plan shall then be implemented in accordance with a timetable of implementation, monitoring and review to be agreed in writing by the Local Planning Authority, we will require the following measures to be included as part of the travel plan in order to maximise the use of public transport:</p> <p>a) The developer must appoint a travel plan co-ordinator, working in collaboration with the Estate Management Team, to monitor the travel plan initiatives annually for a minimum period of 5 years.</p> <p>b) Provision of welcome induction packs containing public transport and cycling/walking information to every new resident, along with a £200 voucher for active travel related equipment purchases, and two Zones 1 to 6 Travel cards for each unit for two years.</p>	
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	<p>c) The applicants are required to pay a sum of, £3,000 (three thousand pounds) for five years £15,000 (fifteen thousand pounds) in total for the monitoring of the travel plan initiatives.</p> <p>Reason: To enable residential occupiers to consider sustainable transport options, as part of the measures to limit any net increase in travel movements.</p> <p><u>5. Section 278 (Highway Works) Agreement</u> Prior to the first occupation of the development, the developer shall enter into an agreement with the Council as the Local Highway Authority under Section 278 of the Highways Act 1980 to undertake highway works comprising, reinstatement of the redundant crossover on Harold Road, resurfacing of the footway to the perimeter of the site to ensure a high quality footway, and changes to the on street waiting and loading restrictions as proposed.</p> <p>The applicant will be required to provide details designs for all associated works including a Stage 1 and Stage 2 Road Safety Audits being carried.</p> <p>Reason: To ensure the highway works are undertaken to high-level standards and in accordance with the Council's requirements. To enable the amendment of the Traffic Management Order enabling the reinstatement of on-street parking outside the site, as well as lining and signing works.</p> <p><u>6. Sustainable and active travel contribution</u> The applicant is to make a £100,000 (one hundred thousand pounds), with a component of the contribution going towards upgrading of the informal pedestrian crossing on Church Lane to a zebra crossing (£70,000) and the remainder (£30,000) to go towards development of the design and implementation of East - West cycle walking and cycling connections, as supported within the Haringey Walking and Cycling action Plan.</p>	
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	<p>Reason – to improve the accessibility of the site by active and sustainable means, improve the pedestrian crossing facilities in the locality of the site, and by doing both contribute towards mode change and travel plan targets in the Travel Plan.</p> <p><u>7. Cycle Parking</u></p> <p>The applicant will be required to provide long and short-stay cycle parking provision, for both residential and non-residential elements of the development, in line with the London Plan (2021), cycle parking is to be design and implemented in line with the London Cycle Design Standards and full layout and dimensioned details will be required for review. These details are required prior to commencement of the development.</p> <p>Reason: To promote travel by sustainable modes of transport and to comply with the London Plan (2021) standards and the London Cycle Design Standards.</p> <p><u>8. Scooter parking</u></p> <p>The applicant will be required to provide secure, weatherproof mobility scooter charging and parking/storage provision, for the occupiers of the accessible units within the development. Full layout and dimensional details will be required prior to commencement of the development.</p> <p>Reason: To promote travel by sustainable modes of transport and to comply with the London Plan (2021) standards and the London Cycle Design Standards.</p> <p><u>9. Delivery and Servicing Plan</u></p> <p>The applicant shall be required to submit a Delivery and Servicing Plan (DSP) for the local authority's approval. The DSP must be in place prior to occupation of the development. The delivery and servicing plan must also include a waste management plan which includes details of how refuse is to be collected from the site.</p> <p>Reason: To ensure that the development does not prejudice the free flow of traffic or public safety along the neighbouring highway.</p>	
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Carbon team	<p>Carbon Management Response 20/03/2023</p> <p>In preparing this consultation response, we have reviewed:</p> <ul style="list-style-type: none"> • Energy and Sustainability Statement prepared by Build Energy Ltd (dated 13/04/2022) • Overheating Risk Assessment prepared by Build Energy Ltd (dated 14/04/2022) • Embodied Carbon Statement Chapter by Create Consulting Engineers Ltd (dated June 2022) • Circular Economy Statement prepared by Create Consulting Engineers Ltd (dated June 2022) • Urban Greening Statement prepared by Archanaeum (dated 22/07/2021) • Relevant supporting documents. <p>1. Summary</p> <p>The development achieves a reduction of 40.25% carbon dioxide emissions on site. It has been proven that higher on-site carbon reductions of around 75-80% can be achieved in this kind of development for the new build development as demonstrated in this report. The applicant should further improve the on-site carbon reductions in line with London Plan Policy SI2, for both the new build and refurbished elements of the development.</p> <p>Further information should also be provided on the refurbishment, Sustainability Strategy and Overheating Assessment which need to be resolved before this application can be fully supported. Appropriate planning conditions will be recommended once this information has been provided.</p> <p>2. Energy – Overall</p> <p>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)) for applications</p>	<p>Observations have been taken into account. Conditions and clauses in 106 recommended</p>

submitted before 1st January 2023. The London Plan (2021) further confirms this in Policy SI2.

The overall predicted reduction in CO₂ emissions for the development shows a site-wide improvement of approximately 40.25% in carbon emissions with SAP10 carbon factors, from the Baseline development model (which is Part L 2013 compliant). This represents an annual saving of approximately 20.30 tonnes of CO₂ from a baseline of 50.71 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: 27.36 tCO₂.

<i>Site-wide (SAP10 emission factors)</i>			
	Total regulated emissions (Tonnes CO₂ / year)	CO₂ savings (Tonnes CO₂ / year)	Percentage savings (%)
Part L 2013 baseline	50.71		
Be Lean	45	5.70	11.26%
Be Clean	36.90	8.20	15.97%
Be Green	30.30	6.40	13.02%
Cumulative savings		20.30	40.25%
Carbon shortfall to offset (tCO₂)	30.30		
Carbon offset contribution	£95 x 30 years x 30.30 tCO ₂ /year = £ 86,355		
10% management fee	£8,635.5		
Total	£94,990.5		

Residential New Build (flats and houses) in Blocks B and C (SAP10)

	Total regulated emissions (Tonnes CO₂ / year)	CO₂ savings (Tonnes CO₂ / year)	Percentage savings (%)
Part L 2013 baseline	23.31		
Be Lean	20.85	2.45	10.52%
Be Clean	16.46	4.39	18.85%
Be Green	12.51	3.95	16.94%
Cumulative savings		10.79	46.31%
Carbon shortfall to offset (tCO₂)	12.51		

Residential Refurbished Building (flats and houses) in Block A (SAP10 emission factors)

	Total regulated emissions (Tonnes CO₂ / year)	CO₂ savings (Tonnes CO₂ / year)	Percentage savings (%)
Part L 2013 baseline	27.40		
Be Lean	24.10	3.20	12%
Be Clean	20.40	3.80	14%
Be Green	17.80	2.50	9%
Cumulative savings		9.50	35%
Carbon shortfall to offset (tCO₂)	17.80		

Actions:

- The carbon reduction tables in the submitted report are not entirely correct; the figures have not been adjusted above. The reported carbon emissions, savings and percentages do not correspond entirely. E.g. the site-wide shortfall is reported as 30.30, but when adding the new build and refurb shortfalls, this comes to 30.31. If using two decimal points, the figures all need to add up. The percentages also need to be correct, and not be cumulative (e.g. for the site-wide table). Please resubmit and also submit the GLA's Carbon Emission Reporting Spreadsheet.
- Please submit full SAP sheets for a representative selection of dwellings for the Baseline, Be Lean and Be Green scenarios. The SAP Compliance Full Specification is not sufficient for this.
- In new build developments of these typologies, we expect to see higher carbon reductions of above 70%, as detailed in the Towards Net Zero Carbon Report 2020.

Energy – Lean

The applicant has proposed a saving of 5.7 tCO₂ in carbon emissions (11.26%) through improved energy efficiency standards in key elements of the build, based on SAP10 carbon factors. This goes beyond the minimum 10% reduction set in London Plan Policy SI2, so this is supported.

The following u-values, g-values and air tightness are proposed:

	New build	Refurbishment
Floor u-value	0.10 W/m ² K	0.25 W/m ² K
External wall u-value	0.14 W/m ² K	0.30 W/m ² K
Roof u-value	0.10 W/m ² K	0.18 W/m ² K
Door u-value	1.00 W/m ² K	1.00 W/m ² K
Window u-value	1.40 W/m ² K	1.40 W/m ² K
G-value	0.63	0.63
Air permeability rate	3 m ³ /hm ² @ 50Pa MVHR or	Not stated

		OR 5 m ³ /hm ² @ 50Pa with Natural Ventilation (applicant to clarify)			
	Ventilation strategy	Block B Flats - Mechanical ventilation with heat recovery (MVHR % efficiency; 0. W/l/s Specific Fan Power) and Block B houses and Block C Flats - Natural ventilation with extract fans	Natural ventilation with extract fans		
	Thermal bridging	Accredited Construction Details	N/A		
	Low energy lighting	100%	100%		
	Heating system (efficiency / emitter)	89.5% efficient gas boilers (Be Lean only)	Radiators		
	Space heating requirement	41.44 kWh/m ² /year	85.66 kWh/m ² /year		
	Improvement from the target fabric energy efficiency (TFEE)	15.40% improvement, from 46.30 to 39.17 kWh/m ² /year	Not stated		
	<p>Refurbishment: the external and party walls will be insulated with mineral wools/slabs insulation and a new slate roof is proposed with upgraded mineral insulation. The existing windows of the police station will be replaced with double glazed timber frame windows.</p> <p><u>Actions:</u> New build</p> <ul style="list-style-type: none"> - Please clarify why two air tightness figures have been quoted and amend with the correct one for the relevant block. Please also clarify where natural ventilation and/or MVHR will be proposed. - An air tightness of 5 m³/hm² @ 50Pa is not sufficiently ambitious, lower air tightness can easily be achieved with MVHR. 				

	<ul style="list-style-type: none"> - Please identify on a plan where the MVHR units will be located within the dwellings. The units should be less than 2m away from external walls. This detail can also be conditioned. - How is lighting energy demand improved? Should consider daylight control and occupancy sensors for communal areas. - What is the proportion of glazed area? Consider following the LETI Climate Emergency Design Guide principles in façade design. - Please set out the proposed Psi (Ψ) value. - What is the construction of the building and what is the assumed thermal mass? - Provide the average space heating requirement in kWh/m²/year. New dwellings should aim to meet the 15-20 kWh/m²/year target. <p>Refurbishments:</p> <ul style="list-style-type: none"> - Provide an estimate of the existing performance in un-refurbished condition. Outline the source of this data or assumptions, such as a building condition survey, an Energy Performance Certificate (EPC). Please also state clearly what figures have been used for the modelling, i.e. current conditions with evidence or the Building Regulations Part L notional figures? - Detail what measures will be undertaken to make the retained building more energy efficient (what type of insulation, how the building will be made more airtight, etc)? Although this detail is included in the Circular Economy Statement, this should be cross-referenced in the Energy Strategy. The improvement of individual fabric elements is supported. - Confirmation of the space heating demand of the retained building. - More emphasis needs to be placed on reducing the energy demand from control systems like lighting, ventilation, equipment and appliances. It is not clear whether lighting will be replaced, advanced lighting/space conditioning controls, smart metering is proposed for the retained building. - The air permeability should be measured; the application should provide air tightness testing results and a strategy to improve air tightness. This 	
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	<p>will be conditioned. However, for current modelling, the notional air tightness figures of Part L should be used. This information was already requested at pre-application stage.</p> <ul style="list-style-type: none"> - What is the strategy to reduce thermal bridging, reducing thermal bridging is especially important in refurbished buildings where improvements are being made to the fabric. - Why is MVHR not proposed for the refurbished dwellings? These are located along the road and are likely to have worse air quality; MVHR units can also filter out some air pollution with good levels of air tightness. <p>Overheating is dealt with in more detail below.</p> <p>Energy – Clean</p> <p>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). Policy DM22 of the Development Management Document supports proposals that contribute to the provision and use of Decentralised Energy Network (DEN) infrastructure. It requires developments incorporating site-wide communal energy systems to examine opportunities to extend these systems beyond the site boundary to supply energy to neighbouring existing and planned future developments. It requires developments to prioritise connection to existing or planned future DENs.</p> <p>The site is not within reasonable distance of a proposed Decentralised Energy Network (DEN). A Combined Heat and Power (CHP) plant would not be appropriate for this site.</p> <p>The applicant has modelled their communal ASHP strategy under Be Clean, however, this has been reported under Be Green below, in line with the GLA Energy Assessment Guidance.</p>	
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	<p>Energy – Green</p> <p>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.</p> <p>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 6.4 tCO₂ (13.02%) reduction of emissions are proposed under Be Green measures.</p> <p>The solar array peak output would be 44.0 kWp, which is estimated to produce renewable electricity equivalent to a reduction of 6.4 tCO₂/year. The array of panels would be mounted on a total roof area of 170 m², at a 30° angle, facing south-west.</p> <p>The development's heating strategy is not clearly set out in the report, and it is not well justified. The development is proposing the use of communal ASHP with minimum of 250% efficiency for Block B flats only. It states The Electric combi boiler will provide hot water and heating to Block B houses and Block C Flats with radiators. No heating system has been specified for the Block A retained building.</p> <p><u>Actions:</u></p> <ul style="list-style-type: none"> - Why are different heating strategies proposed for the new build flats, new build houses and refurbished flats? What options were assessed during the design stage, and for what reasons were they discounted? A communal ASHP for the whole site should be considered, and was proposed at pre-application stage. Alternatively, the new build houses should have ASHP as these have higher efficiency rates and electric heating solutions should not be delivered where Passivhaus levels of fabric efficiency (with 15 kWh/m²/year maximum space heating demand). 	
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- Please provide some commentary on how the available roof space has been maximised to install solar PV. Has your feasibility shown that other roofs will not be viable / will they be used for other purposes?
- How will the solar energy be used on site (before surplus is exported onto the grid)?
- A living roof should be installed under the solar PV, or if this is not feasible, the roof should be light coloured to reduce solar heat gains and the improve efficiency of the solar panels.
- How much of the heating/hot water demand will be met by the proposed types of heat pumps? If this cannot be met fully, how will this be supplemented?
- What is the Seasonal Coefficient of Performance (SCOP), the Seasonal Performance Factor (SFP) and Seasonal Energy Efficiency ratio (SEER) of the ASHP?
- Provide the make and model of the Electric combi boiler and its efficiency.

Energy – Be Seen

London Plan Policy SI2 requests all developments to ‘be seen’, to monitor, verify and report on energy performance. The GLA requires all major development proposals to report on their modelled and measured operational energy performance. This will improve transparency on energy usage on sites, reduce the performance gap between modelled and measured energy use, and provide the applicant, building managers and occupants clarity on the performance of the building, equipment, and renewable energy technologies.

The development proposes the use of smart meters.

- Demonstrate that the planning stage energy performance data has been submitted to the GLA webform for this development:
<https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance/be-seen-energy-monitoring-guidance/be-seen-planning-stage-webform>)

3. Carbon Offset Contribution

A carbon shortfall of 30.30 tCO₂/year remains. The remaining carbon emissions will need to be offset at £95/tCO₂ over 30 years. This includes the shortfall in reduction in emissions from the refurbished elements as these also need to comply with Policy SI2 to deliver a zero-carbon development.

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.

In accordance with the Energy Assessment Guidance, the applicant has undertaken a dynamic thermal modelling assessment in line with CIBSE TM59 with TM49 London Heathrow weather files, and the cooling hierarchy has been followed in the design. The report has modelled 34 habitable rooms, 25 dwellings and 0 corridors under the London Heathrow files.

All three blocks are modelled with openable windows, however due to the noise constraints of this site being adjacent to the roadway A103, and Harold Road, the TM59 criteria for predominantly mechanically ventilated dwellings should be applied (assuming windows need to remain closed) for all blocks.

Results are listed in the table below.

	TM59 – criterion A (<3% hours of overheating)	TM59 – criterion B hours >26°C (pass <33 hours)	Number of habitable rooms pass TM59	Number of corridors pass

DSY1 2020s	103/103	72/72	103	0/0
DSY2 2020s	Not Modelled	Not Modelled		
DSY3 2020s	Not Modelled	Not Modelled		
DSY1 2050s	Not Modelled	Not Modelled		
DSY1 2080s	Not Modelled	Not Modelled		

All rooms pass the overheating requirements for 2020s DSY1. In order to pass this, the following measures will be built:

- Block A (retained): Natural ventilation;
- Block B with MVHR Living Rooms – 30l/s & Bedrooms – 25l/s;
- Block C with MVHR Living Rooms – 30l/s and Bedrooms – 20l/s, with openable areas of 0.8 and opening angle of 54.8%;
- Glazing – u-value of 1.4 W/m²K, g-value of 0.3 and 60%LT (Light Transmission);
- No active cooling.

No future mitigation measures have been proposed.

Overheating Actions:

- Redo the overheating modelling with the Central London weather file, which will more accurately represent the urban heat island effect.
- The worst-case corridor should be modelled in Block B (and others as applicable) where the communal heating system has been proposed. Details of the pipework heat gain assumptions must also be provided, for both the corridors and the gains within flats.

	<ul style="list-style-type: none"> - The applicant has not modelled DSY 2 or 3 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. Any remaining overheating should inform the future retrofit plan. - The ventilation strategy needs to align with the likelihood that residents might be or feel constrained to open their windows for natural ventilation. This includes risk of crime at night, or sources of air or noise pollution. With these constraints, habitable rooms should be modelled as closed, unless suitable mitigation measures are proposed to allow for natural ventilation. <ul style="list-style-type: none"> o Confirm that the habitable rooms facing the main road are not subject to adverse noise or air pollution. Rooms closest to any significant noise and / or air pollution source have to be modelled with windows closed at all times unless the pollution risk is mitigated (with cross reference to the Noise and the Air Quality Assessments to demonstrate the most sensitive receptors and the AVO Residential Design Guide). o What secure by design measures have been included in the design to prevent the risk of crime to ground floor and accessible habitable rooms that rely on natural ventilation? Will these windows be openable at night? - Please specify and model the future mitigation measures and demonstrate how this will improve the overheating results. - Identify communal spaces (indoor and outdoor) where residents can cool down if their flats are overheating. - Confirm who will own the overheating risk when the building is occupied (not the residents). - Please include images indicating which sample dwellings were modelled and floorplans showing the modelled internal layout of dwellings. - The applicant must demonstrate that the risk of overheating has been reduced as far as practical and that all passive measures have been explored, including reduced glazing and increased external shading. The 	
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	<p>applicant should also outline a strategy for residents to cope in extreme weather events, e.g. use of fans.</p> <ul style="list-style-type: none"> - This development should have a heatwave plan / building user guide to mitigate overheating risk for occupants. <p>5. Sustainability</p> <p>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 sustainability of the scheme which includes materials and waste. Further information on measures to improve the sustainability including transport, health and wellbeing, materials and waste, water consumption, flood risk and drainage, biodiversity, climate resilience, energy and CO2 emissions and landscape design, is needed.</p> <p><u>Action:</u></p> <ul style="list-style-type: none"> - What electric vehicle charging points are proposed? This allows the futureproofing of the dwelling/development by ensuring the required power has been installed. - A target (%) for responsible sourced, low-impact materials used during construction. - Set out how any demolition materials can be reused. - Set out how surface water runoff will be reduced, that it will be separated from wastewater and not discharged into the sewer. - Climate change mitigation should also be considered for the external spaces (shading, etc) and the impact of the increase in severity and frequency of weather events on the building structures. <p><i>Urban Greening / Biodiversity</i></p> <p>All development sites must incorporate urban greening within their fundamental design and submit an Urban Greening Factor Statement, in line with London Plan Policy G5. London Plan Policy G6 and Local Plan Policy DM21 require proposals to manage impacts on biodiversity and aim to secure a biodiversity net gain.</p>	
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	<p>Additional greening should be provided through high-quality, durable measures that contribute to London's biodiversity and mitigate the urban heat island impact. This should include tree planting, shrubs, hedges, living roofs, and urban food growing. Specifically, living roofs and walls are encouraged in the London Plan. Amongst other benefits, these will increase biodiversity and reduce surface water runoff.</p> <p>The development achieves an Urban Greening Factor of 0.43, which complies with the interim minimum target of 0.4 for predominantly residential developments in London Plan Policy G5.</p> <p>The Biodiversity Net Gain calculation has not been reported.</p> <p><u>Action:</u></p> <ul style="list-style-type: none"> - Submit Biodiversity New Gain Calculation. <p><i>Whole Life-Cycle Carbon Assessments</i></p> <p>Policy SI2 requires developments referable to the Mayor of London to submit a Whole Life-Cycle Carbon Assessment and demonstrate actions undertaken to reduce life-cycle emissions.</p> <p>This application is not required to submit a full WLC statement. The following information is proposed to reduce the whole-life carbon emissions:</p> <ul style="list-style-type: none"> • An embodied carbon assessment of the infill wall composed of lightweight steel framing system and brickwork is calculated to have a self-weight of 240kg/m² and an embodied carbon measure of 86kgCO₂/m². • Brick and blockwork infill wall has a calculated self-weight of 291kg/m² and an embodied carbon measure of 91kgCO₂ /m². The lightweight steel infill system has a high-strength to weight ratio, contributing to a reduction in weight of the supporting systems by 17.5% relative to block-work construction. 	
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- Substituting cement with less carbon-intensive cement replacement products, such as fly ash or PFA.
- The use of recycled bricks and locally sourcing them which can save carbon emission.

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 principles used for this development are:

- Designing for longevity, circa 50 years of building life, and disassembly at end of life
- Designing for flexibility and adaptability of open spaces and commercial spaces
- Retaining and refurbishing Grade II listed buildings
- Demolishing and recycling industrial/retail units
- Minimise operational waste and provide adequate space for recycling

The report sets out the Key Commitments (Section-4), Bill of materials (Section 4.1) and Recycling and waste reporting comment (Section 4.2). This is a fairly high level of information, and the applicant expects this to become more detailed as the detailed design progresses following permission.

6. Planning Obligations Heads of Terms

- Energy Plan and Sustainability Review
- Be Seen commitment to uploading energy data
- Estimated carbon offset contribution (and associated obligations) of £94,990.5 (including the 10% management fee; calculation based on £2,850 per tonne of carbon emissions)

	<p>7. Planning Conditions</p> <p>To be secured, however amendments are expected to be submitted and outstanding items resolved before the conditions can be drafted.</p> <p>Carbon Management Response 04/07/2023</p> <p>In preparing this consultation response, we have reviewed:</p> <ul style="list-style-type: none"> • Energy and Sustainability Statement prepared by Create Consulting Engineers Ltd (dated April 2023) • SS_CC_P22-2562 Carbon Management Response HGY_2022_2116-1.0- Applicant's response • Overheating Risk Assessment prepared by Create Consulting Engineers Ltd (dated June 2023) • Biodiversity Net Gain Assessment prepared by Arbtech (dated 24 June 2023) <p>1. Summary</p> <p>The development now achieves a reduction of 81% carbon dioxide emissions on site calculated with Part L 2021, updated from 40% emissions from a Part L 2013 baseline with improved fabric efficiencies in the existing building.</p> <p>Although this increase in on-site savings is supported in principle, we question the deliverability of this through the lack of evidence in other supporting documents as part of the planning application that the energy strategy can be delivered. The proposed building specifications are not aligned between the energy strategy, overheating strategy, and architectural plans, sections, and elevations. We therefore object to this application.</p> <p>The Overheating Assessment has been updated with the right London Weather Centre file; the update to assessing the heat risk more realistically and</p>	
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appropriately assessing the noise and air quality constraints in relation to the overheating risk is welcomed.

Some clarifications must be provided with regard to the Energy Strategy and Overheating Strategy detailed below.

Appropriate planning conditions will be recommended once this information has been provided.

2. Energy – Overall

With updated specifications, the development has been remodelled under Part L 2021 to a site-wide carbon reduction of 81%. This represents a saving of around 49.9 tCO₂/year from a baseline of 62 tCO₂/year.

The calculated unregulated emissions are 0.3 tCO₂/m²/year, updated from the 27 tCO₂/year previously calculated under the Part L 2013 baseline. The new figure is very low.

<i>Site-wide</i>			
	Total regulated emissions (Tonnes CO₂ / year)	CO₂ savings (Tonnes CO₂ / year)	Percentage savings (%)
Part L 2021 baseline	62.0		
Be Lean	43.0	19.1	31%
Be Clean	38.7	4.3	7%
Be Green	12.1	26.6	46%
Cumulative savings		59.9	81%
Carbon shortfall to offset (tCO₂)	12.1		

Carbon offset contribution	£95 x 30 years x 12.10 tCO ₂ /year = £ 34,485
10% management fee	£3,448.5
Total	£37,933.5

Actions:

- The unregulated emissions need to be reported in tonnes per year site-wide (including refurbishment and new build).
- Submit carbon reduction summary tables for both new build and refurbishment.
- With the amount of SAP sheets issued, it is very difficult to sift through the relevant sheets. Please add sub-chapters (cross referenced in the table of contents), separating out refurb and new build elements and only including the Baseline, Be Lean and Be Green sheets for a representative sample of dwellings.

Energy Use Intensity / Space Heating Demand

Applications are required to report on the total Energy Use Intensity and Space Heating Demand, in line with the GLA Energy Assessment Guidance (June 2022). The Energy Strategy should follow the reporting template set out in Table 5 of the guidance, including what methodology has been used. EUI is a measure of the total energy consumed annually but should exclude on-site renewable energy generation and energy use from electric vehicle charging.

Building type	EUI (kWh/m²/year)	Space Heating Demand (kWh/m²/year)	Methodology used
New Building	66.72 kWh/m ² /year	19.69 kWh/m ² /year	SAP Calculations
Refurbishment	49.70 kWh/m ² /year	16.96 kWh/m ² /year	SAP Calculations

Actions:

- The EUI and Space Heating Demand figures for the refurbishment are lower than the new build, which seems unlikely for a number of reasons, including that the values do not align below and are not aligned with the level of improvement to the Target Fabric Energy Efficiency.

Energy – Lean

The applicant has proposed a saving of 19.1 tCO₂ in carbon emissions (31%) through improved energy efficiency standards in key elements of the build, based on SAP10 carbon factors.

The applicant has incorporated improved fabrics for both new built and refurbished parts of the development – only the updated specs have been included below:

	New build	Refurbishment
Floor u-value	Unchanged - 0.10 W/m ² K	0.10 W/m ² K
External wall u-value	Unchanged - 0.14 W/m ² K	0.14 W/m ² K
Roof u-value	Unchanged - 0.10 W/m ² K	0.10 W/m ² K
Door u-value	0.98 W/m ² K	0.98 W/m ² K
Window u-value	1.20 W/m ² K	1.20 W/m ² K
Air permeability rate	3 m ³ /hm ² @ 50Pa	3 m ³ /hm ² @ 50Pa
Ventilation strategy	All dwellings from Block B&C - Mechanical ventilation with heat recovery (MVHR 91% efficiency; 0.88 W/l/s Specific Fan Power)	All dwellings from Block A - Mechanical ventilation with heat recovery (MVHR 91% efficiency; 0.88 W/l/s Specific Fan Power)
Thermal bridging	LABC equivalent psi values where available	LABC equivalent psi values where available
Low energy lighting	100%	100%

	Heating system (efficiency / emitter)	89.5% efficient gas boilers (Be Lean only); Communal ASHPs for flats with 300% efficiency and Individual ASHPs for houses with 129% efficiency (Be Green only)	89.5% efficient gas boilers (Be Lean only); Communal ASHPs for flats with 300% efficiency and Individual ASHPs for houses with 129% efficiency (Be Green only)	
	Improvement from the target fabric energy efficiency (TFEE)	6% improvement from 43.74 to 40.93 kWh/m2/year	6% improvement, from 51.43 to 48.29 kWh/m2/year	
	<p>The proposed U-values of the external walls are achieved with 100mm insulation sandwiched between the external and internal brick layers and 37.5 mm insulated plaster board. Similarly, the roof's u-value is achieved with a combination of roof tiles, timber battens, membrane, 120mm insulation between timber joints, and 37.5 mm insulated plasterboard. The drawing provided in Appendix I demonstrates the implementation of this insulation. Specifically, for the walls, a total of 137.5mm insulation is utilized, while the roof incorporates 157.5mm of insulation.</p> <p><u>Actions:</u></p> <ul style="list-style-type: none"> - The g-value in the Energy Strategy is 0.68, but it is 0.25 in the Overheating Strategy. The two need to be aligned to ensure the modelling is correct for both strategies. The u-value can be higher for north-facing windows to retain more heat, and lower on all other elevations to reduce solar gains. In addition, the g-value between the existing and new build has not been differentiated. - The retained building is proposed to be retrofitted to achieve u-values of 0.14 (walls), 0.10 (floors, roof) and 1.20 windows. Information varies within the energy statement on how these u-values will be achieved, citing different insulation thicknesses. <ul style="list-style-type: none"> o Walls - the energy strategy says, a cavity will be created to insulate the existing walls from the outside it looks like it is a solid 			

	<p>wall and not a cavity wall. On the proposed plans, it does not appear that insulation is added. This is an issue as it is related to high carbon savings under Be Lean of the refurbished building. If the internal insulation was not accounted for, is likely that the internal floor area will be reduced. We are not sure if they will not meet the minimum space standards as a result.</p> <ul style="list-style-type: none"> ○ The windows appear to be single glazed (from google streetview), and the plans say they will be retained. Then how will a u-value of 1.20 be achieved? - Please provide the updated building floor plans that includes the proposed insulation. - Please provide commentary how the building airtightness will be improved in the existing building. <p>Energy – Green</p> <p>The application has reviewed the installation of various renewable technologies. The report concludes that solar photovoltaic (PV) panels and ASHP are the most viable options to deliver the Be Green requirement. A total of 28.6 tCO₂ (46%) reduction of emissions are proposed under Be Green measures.</p> <p>Communal ASHP (300%, COP of 3) is used for all flats including new built and refurb while individual ASHPs (129%, SCOP of 3.24) is used for all flats from new built and refurb. Electric combi has been modelled with minimum distribution loss space and efficiency of 300%.</p> <p>The solar array peak output is proposed to be 26kWp, 6.5kWp for the refurbished unit and 19.5kWp for the new built unit. The total output of 26kWp is almost half than the total of 44kWp proposed initially. It is unclear why this has been reduced and how the available roof space has been maximised for solar PV installation.</p> <p><u>Actions:</u></p>	
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	<ul style="list-style-type: none"> - Please provide a commentary on why a lower output solar PV is proposed, when during the meeting it was stated that solar PV was being maximised. This reduction is not supported, and it is unclear why less is being proposed. The policy is to be zero carbon by maximising carbon reduction on site. It is recommended to maximise the available roof space with solar PV installation, on other parts of the roof. - The roof plan needs to be amended to include annotations of the solar PV panels and proposed living roof areas. <p>Energy – Be Seen</p> <p>The development proposes the use of smart meters. Submission of data on Be Seen platform has not yet been confirmed, this remains outstanding.</p> <p>3. Carbon Offset Contribution</p> <p>A carbon shortfall of 12.1tCO₂/year remains. The remaining carbon emissions will need to be offset at £95/tCO₂ over 30 years. This includes the shortfall in reduction in emissions from the refurbished elements as these also need to comply with Policy SI2 to deliver a zero-carbon development.</p> <p>4. Overheating</p> <p>The applicant has resubmitted a dynamic thermal modelling assessment in line with CIBSE TM59 with TM49 London Weather Centre files. The report has modelled 68 bedrooms, 35 spaces and 4 corridors.</p> <p>The report does not include floor plans showing the modelled internal layout of the dwellings.</p> <p>The overheating assessment is performed with closed windows due to noise constraints as the baseline scenario.</p> <ul style="list-style-type: none"> - Baseline + Mitigation strategy 1 – Closed windows with mechanical ventilation - Baseline + Mitigation strategy 2 – Closed windows mechanical ventilation with external blinds 	
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- Baseline + Mitigation strategy 3 – Close windows with MVHR, external blinds and extract fans.

Results are listed in the table below:

	TM59 – criterion A (<3% hours of overheating)	TM59 – criterion B hours >26°C (pass <33 hours)	Number of habitable rooms pass TM52	Number of corridors pass
Baseline – Close windows and no mechanical ventilation				
DSY1 2020s	0/103	0/68	0/103	4/4
DSY2 2020s	0/103	0/68	0/103	0/4
DSY3 2020s	0/103	0/68	0/103	0/4
DSY1 2050s	Not modelled	Not Modelled	Not Modelled	Not Modelled
DSY1 2080s	0/103	0/68	0/103	0/4
Baseline + mitigation strategy 1				
DSY1 2020s	33/103	33/68	103/103	2/4
DSY2 2020s	0/103	0/68	103/103	0/4
DSY3 2020s	0/103	0/68	103/103	0/4
DSY1 2050s	Not modelled	Not Modelled	Not Modelled	Not Modelled
DSY1 2080s	0/103	0/68	65/103	0/4
Baseline + mitigation strategy 2				

	DSY1 2020s	30/103	30/68	103/103	2/4
	DSY2 2020s	0/103	0/68	103/103	0/4
	DSY3 2020s	0/103	0/68	103/103	0/4
	DSY1 2050s	Not modelled	Not Modelled	Not Modelled	Not Modelled
	DSY1 2080s	0/103	0/68	65/103	0/4
	Baseline + mitigation strategy 3				
	DSY1 2020s	103/103	68/68	103/103	2/4
	DSY2 2020s	103/103	68/68	103/103	0/4
	DSY3 2020s	103/103	68/68	103/103	0/4
	DSY1 2050s	Not modelled	Not Modelled	Not Modelled	Not Modelled
	DSY1 2080s	35/103	0/68	60/103	0/4
	<p>All rooms pass the overheating requirements for 2020s DSY1. In order to pass this, the following measures will be built:</p> <ul style="list-style-type: none"> - Closed windows - MVHR with extract fans - Glazing – u-value of 1.2 W/m²K, g-value of 0.25; <p>No future mitigation measures have been proposed.</p> <p>The applicant confirms the building management team supervised by the freeholder/owner will own the overheating risk.</p>				

	<p><u>Overheating Actions:</u></p> <ul style="list-style-type: none"> - Please submit plans and sections showing the external shading including its specifications. - Set out the heat losses from pipework and heat interface units for the communal heating system. - Please include images and floorplans showing the modelled internal layout of dwellings. - Set out a retrofit plan for future and more extreme weather files, demonstrating how these measures can be installed, how they would reduce the overheating risk, what their lifecycle replacement will be, and who will be responsible for overheating risk. - This development should have a heatwave plan / building user guide to mitigate overheating risk for occupants. <p>5. Sustainability</p> <p>The development is proposed as a car-free scheme. Recommendations have been made for responsible sourcing of materials and sustainable materials. Development of construction and demolition management plan is proposed along with pre-demolition audit.</p> <p><i>Urban Greening / Biodiversity</i></p> <p>The Biodiversity Net Gain Assessment shows the proposed plan results in a 100% net gain in habitat units which goes beyond the 10% target of biodiversity net gain.</p> <p><i>Living roofs & Living walls</i></p> <p>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</p>	
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	<p>ground with sufficient substrate depth. Living roofs and living walls are supported in principle, subject to detailed design. Details for living roofs will need to be submitted as part of a planning condition.</p> <p>The applicants have noted that there will be living roofs and living walls (ref para 7.22 of energy statement and s3.2 of BNG Report) in the scheme, but no evidence has been submitted. Plan ref: 044_A-114 does not indicate annotation for living roofs, solar PV, and any plant equipment on the roof.</p> <p><u>Actions:</u></p> <ul style="list-style-type: none"> - Please provide annotated plans including the living roofs, solar PV, and any plant equipment proposed on the roof. <p><i>Whole Life-Cycle Carbon Assessments</i> No further actions required.</p> <p><i>Circular Economy</i> No further actions required.</p> <p>6. Planning Obligations Heads of Terms</p> <ul style="list-style-type: none"> - Energy Plan and Sustainability Review - Be Seen commitment to uploading energy data - Estimated carbon offset contribution (and associated obligations) of £31,663.5 (including the 10% management fee; calculation based on £2,850 per tonne of carbon emissions) <p>7. Planning Conditions To be secured, however amendments are expected to be submitted and outstanding items resolved before the conditions can be drafted.</p> <p>Carbon Management Response 10/07/2023</p>	
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	<p>In preparing this consultation response, we have reviewed:</p> <ul style="list-style-type: none"> • Energy and Sustainability Statement prepared by Create Consulting Engineers Ltd (dated 6th July 2023, Rev B) and appendices • Overheating Risk Assessment prepared by Create Consulting Engineers Ltd (dated 7th July 2023) and appendices • 044_A-214 Rev 05 • 044_A-215 Rev 04 • 044_A-216 Rev 06 • Link to the specification of external roller blinds <p>Summary</p> <p>The applicant has remodelled the carbon emissions for the development, using the correct baseline in line with Building Regulations and using SAP10 carbon factors for unregulated emissions.</p> <p>The applicant has now also included external blinds into their overheating mitigation strategy.</p> <p>The development now achieves a site-wide reduction of 80% in on-site carbon dioxide emissions calculated with Part L 2021. this is achieved through a 81% reduction in the new build dwellings, with a 23% reduction under Be Lean, and a 80% reduction in the existing building with a 30% reduction under Be Lean.</p> <p>Overall, this scheme will be retrofitting the existing building and build new residential dwellings around this, at a high standard. This ambition is supported. Suitable planning conditions have been recommended below to secure the benefits of this scheme.</p> <p>Energy Strategy</p>	
	<p><i>Site-wide</i></p>	

	Total regulated emissions (Tonnes CO ₂ / year)	CO ₂ savings (Tonnes CO ₂ / year)	Percentage savings (%)
Part L 2021 baseline	52.6		
Be Lean	39	13.5	26%
Be Clean	31.4	4.9	9%
Be Green	10.3	23.8	46%
Cumulative savings		42.3	80%
Carbon shortfall to offset (tCO ₂)	10.3		
Carbon offset contribution	£95 x 30 years x 10.3 tCO ₂ /year = £29,355		
10% management fee	£2,935		
Total	£32,290		

Overheating
Following discussions, the applicant has confirmed that external shading will form part of the overheating mitigation strategy. External shading will help reduce the overheating risk and ventilation demand. The shutters will be integrated into the windows. Updated elevations have been submitted.

Planning Obligations – Heads of Terms
To be secured:

- Energy Plan
- Sustainability Review
- Be Seen commitment to uploading energy data

	<ul style="list-style-type: none"> - Estimated carbon offset contribution (and associated obligations) of £29,355 (calculation based on £2,850 per tonne of carbon emissions), plus a 10% management fee; <p>Planning Conditions</p> <p>Energy Strategy</p> <p>The development hereby approved shall be constructed in accordance with the Energy & Sustainability Strategy by Create Consulting Engineers (dated July 2023) delivering a minimum 80% improvement on carbon emissions over 2021 Building Regulations Part L, high fabric efficiencies, air source heat pumps (ASHPs) and a minimum 36.8 kWp solar photovoltaic (PV) array.</p> <p>(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:</p> <ul style="list-style-type: none"> - Confirmation of how this development will meet the zero-carbon policy requirement in line with the Energy Hierarchy following the GLA Energy Assessment Guidance; - Confirmation of the necessary fabric efficiencies to achieve a minimum 26% reduction; - Details to reduce thermal bridging; - Location, specification and efficiency of the proposed ASHPs (Coefficient of Performance, Seasonal Coefficient of Performance, and the Seasonal Performance Factor), with plans showing the ASHP pipework and noise and visual mitigation measures; - Specification and efficiency of the proposed Mechanical Ventilation and Heat Recovery (MVHR), with plans showing the rigid MVHR ducting and location of the unit; - 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); and how the energy will be used on-site before exporting to the grid; 	
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	<ul style="list-style-type: none"> - Specification of any additional equipment installed to reduce carbon emissions. <p>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.</p> <p>(b) Six months following the first occupation of that block, evidence that the solar PV arrays have been installed correctly and are operational, shall be submitted to and approved by the Local Planning Authority, including photographs of the solar array, installer confirmation, an energy generation statement for the period that the solar PV array has been installed, and a Microgeneration Certification Scheme certificate.</p> <p>(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.</p> <p>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.</p> <p>Retrofit Prior to the commencement of any works to retrofit the existing building, an Energy Strategy shall be submitted to and approved in writing by the Local Planning Authority. This strategy shall:</p> <ul style="list-style-type: none"> - Set out how the development will aim for PAS 2035:2019 & 2030:2017 compliance, with all documentation lodged on the Trustmark data warehouse as appropriate 	
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	<ul style="list-style-type: none"> - Set out how it will reduce the development's carbon emissions prioritising improvements to the fabric, using SAP or Passive House Planning Package calculations; - Set out the existing air tightness level (measured), and the air tightness strategy on how and where air tightness will be improved to a maximum of 3 m3/m2h @ 50Pa; - Set out a detailed strategy to reduce thermal bridging, reducing risks of condensation and heat loss, with calculations of the proposed thermal bridge heat loss factors; - Confirm details of what materials and thicknesses of insulation will be used and where, showing on detailed plans and sections; how the fenestration will be improved (preference for double or triple glazing in existing timber frames); - Provide existing measured space heating demand (kWh/m2/year) and energy use (kWh/year) and set out the modelled space heating demand for the development (kWh/m2/year). <p>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.</p> <p>Energy Monitoring No development shall take place beyond the superstructure of the development until a detailed scheme for energy monitoring has been submitted to and approved in writing by the Local Planning Authority. The details shall include details of suitable automatic meter reading devices for the monitoring of energy use and renewable/ low carbon energy generation. The monitoring mechanisms approved in the monitoring strategy shall be made available for use prior to the first occupation of each building and the monitored data for each block shall be submitted to the Local Planning Authority, at daily intervals for a period of 5 years from final completion.</p>	
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	<p>Within six months of first occupation of any dwellings, evidence shall be submitted in writing to the Local Planning Authority that the development has been registered on the GLA's Be Seen energy monitoring platform.</p> <p>REASON: To ensure the development can comply with the Energy Hierarchy in line with London Plan 2021 Policy SI 2 and Local Plan Policy SP4 before construction works prohibit compliance.</p> <p>Overheating</p> <p>Prior to the above ground commencement of the development, an updated Overheating Report shall be submitted to and approved by the Local Planning Authority to confirm the overheating mitigation strategy in the Overheating Assessment prepared by Create Consulting Engineers (dated July 2023) that has been approved in principle.</p> <p>This report shall include:</p> <ul style="list-style-type: none"> - Updated modelling of units modelled based on CIBSE TM59, using the CIBSE TM49 London Weather Centre files for the DSY1-3 (2020s) and DSY1 2050s and 2080s, high emissions, 50% percentile; - Confirmation on which windows the external shutters will be installed; - Demonstrating the mandatory pass for DSY1 2020s can be achieved following the Cooling Hierarchy with external shutters and in compliance with Building Regulations Part O, demonstrating that any risk of crime, noise and air quality issues are mitigated appropriately evidenced by the proposed location and specification of measures; - Modelling of mitigation measures required to pass future weather files, clearly setting out which measures will be delivered before occupation and which measures will form part of the retrofit plan; - Confirmation that the retrofit measures can be integrated within the design (e.g., if there is space for pipework to allow the retrofitting of cooling and ventilation equipment), setting out mitigation measures in line with the Cooling Hierarchy; 	
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	<ul style="list-style-type: none"> - Confirmation who will be responsible to mitigate the overheating risk once the development is occupied. <p>(b) Prior to occupation of the development, details of external blinds/shutters to all habitable rooms must be submitted for approval by the local planning authority. This should include the fixing mechanism, specification of the shutters, shading coefficient, etc. Occupiers must retain internal blinds for the lifetime of the development, or replace the blinds with equivalent or better shading coefficient specifications.</p> <p>(c) Prior to occupation, the development must be built in accordance with the approved overheating measures and retained thereafter for the lifetime of the development:</p> <ul style="list-style-type: none"> - External roller shutters; - MVHR with extract fans; - Glazing – u-value of 1.2 W/m²K, g-value of 0.25 (except north-facing façade with a g-value of 0.52); - Hot water pipes insulated to high standards; - Any further mitigation measures as approved by or superseded by the latest approved Overheating Strategy. <p>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.</p> <p>Building User Guide</p> <p>Prior to occupation, a Building User Guide for new residential occupants shall be submitted in writing to and for approval by the Local Planning Authority. The Building User Guide will advise residents how to operate their property during a heatwave, setting out a cooling hierarchy in accordance with London Plan (2021) Policy SI4 with passive measures being considered ahead of cooling systems for</p>	
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	<p>different heatwave scenarios. The Building User Guide should be easy to understand, and will be issued to any residential occupants before they move in, and should be kept online for residents to refer to easily.</p> <p>Reason: In the interest of reducing the impacts of climate change and mitigation of overheating risk, in accordance with London Plan (2021) Policy SI4, and Local Plan (2017) Policies SP4 and DM21.</p> <p>Living Roofs and Walls</p> <p>(a) Prior to the above ground commencement of development, details of the living roofs 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:</p> <ul style="list-style-type: none"> i) A roof plan identifying where the living roofs will be located, and a ground floor plan identifying where the living walls will be rooted in the ground, if any; ii) A section demonstrating 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); iii) Roof plans annotating details of the substrate: showing at least two substrate types across the roofs, annotating contours of the varying depths of substrate iv) Details of the proposed type of invertebrate habitat structures with a minimum of one feature per 30m² 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 1m², rope coils, pebble mounds of water trays; 	
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	<p>v) Details on the range and seed spread of native species of (wild)flowers and herbs (minimum 10g/m²) and density of plug plants planted (minimum 20/m² with root ball of plugs 25cm³) to benefit native wildlife, suitable for the amount of direct sunshine/shading of the different living roof spaces. The living roofs will not rely on one species of plant life such as Sedum (which are not native);</p> <p>vi) Roof plans and sections showing the relationship between the living roof areas and photovoltaic array; and</p> <p>vii) Management and maintenance plan, including frequency of watering arrangements.</p> <p>viii) A section showing the build-up of the blue roofs and confirmation of the water attenuation properties, and feasibility of collecting the rainwater and using this on site;</p> <p>(b) Prior to the occupation of 90% of the dwellings, evidence must be submitted to and approved by the Local Planning Authority that the living roofs 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 roofs have not been delivered to the approved standards, the applicant shall rectify this to ensure it complies with the condition. The living roofs shall be retained thereafter for the lifetime of the development in accordance with the approved management arrangements.</p> <p>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.</p> <p>Biodiversity Measures</p> <p>(a) Prior to the commencement of development, details of ecological enhancement measures and ecological protection measures shall be submitted to and approved in writing by the Council. This shall detail the biodiversity net gain, plans showing the proposed location of ecological enhancement measures,</p>	
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	<p>a sensitive lighting scheme, justification for the location and type of enhancement measures by a qualified ecologist, and how the development will support and protect local wildlife and natural habitats.</p> <p>(b) Prior to the occupation of development, photographic evidence and a post-development ecological field survey and impact assessment shall be submitted to and approved by the Local Planning Authority to demonstrate the delivery of the ecological enhancement and protection measures is in accordance with the approved measures and in accordance with CIEEM standards.</p> <p>Development shall accord with the details as approved and retained for the lifetime of the development.</p> <p>Reason: To ensure that the development provides the maximum provision towards the creation of habitats for biodiversity and the mitigation and adaptation of climate change. In accordance with London Plan (2021) Policies G1, G5, G6, SI1 and SI2 and Local Plan (2017) Policies SP4, SP5, SP11 and SP13.</p> <p>Water Butts No dwellinghouse shall be occupied until details of the location of a water butt of at least 120L internal capacity to be installed to intercept rainwater draining from the roof of each dwelling has been submitted to and approved in writing by the Local Planning Authority and subsequently provided at each dwelling. The approved facilities shall be retained.</p> <p>Reason: To reduce the risk of flooding and demand for water, increase the level of sustainability of the development and in line with Haringey Local Plan Policy SP5, DM21, DM24 and DM25.</p>	
Waste Management Team	Officers comments dated September 2022	Comments noted

	<p>The information relating to refuse in section 5 of the Design Statement, Access and Servicing, is slightly confusing and will require clarification before this application can be signed off by the waste team.</p> <p>It appears that the individual houses in this development will use the communal bin stores and the drawings show that the correct number of bins to accommodate the waste from these units alongside that of the flats. There is then reference to 'each house has refuse storage in line with council requirements' and individual receptacles are listed. If it can be confirmed that the 6 terraced houses in block A and the 4 mews houses in Block B will not have individual bins but will use the communal bin stores that would be helpful.</p> <p>If this is confirmed, then bin requirements are set out below. Collections for all waste streams will be weekly.</p> <ul style="list-style-type: none"> • Block A flats (4) – 1 x 1100l refuse, 1 x 1100l mixed dry recycling, 1 x 140l wheeled bin for food waste • Block A houses (6) and Block C flats (8) – 3 x 1100l refuse, 2 x 1100l mixed dry recycling, 1 x 140l wheeled bin for food waste • Block B mews houses (4) and flats (7) – 2 x 1100l refuse, 2 x 1100l mixed dry recycling, 1 x 140l wheeled bin for food waste <p>Drag distances from the bin stores to the collection vehicle on the Harold Road side of the development appear will be within the 10m required distance. The bin store serving block B and the mews properties will be collected from Tottenham Lane. The drag distance here appears to be longer than the permitted 10m. Confirmation of the pull distance of the bins from this bin store will be needed, and if this is the case whether the proposed servicing strategy is for the collection vehicle to back up into the development to collect from here.</p> <p>Applicants response dated 06 October 2022</p>	
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	<p>The houses in Blocks A & B will share the communal bin stores. We have a loading bay allocated at the junction of the mews street and Tottenham Lane, the refuse vehicle will be able to pull in and bring the collection distance to 10m</p> <p>Officers comments dated 06 October 2022</p> <p>This is very helpful and clarifies the areas where more information was needed. As such, we can support this application from a waste management perspective.</p>	
Building Control	<p>I can confirm that I have no adverse comments to make with regards to the fire statement submitted for the above development.</p> <p>The scheme will however, be subject to a full check of the requirements of the Building Regulations 2010, when a formal application is submitted to Haringey Building Control.</p>	Comments noted
Flood & Water Management Lead	<p>Having reviewed the applicant's submitted following documents: a) Flood Risk Assessment document reference number FRA - TT/VL/P22-2562/01 dated 21st July 2022 along with b) Thames Water Asset plans</p> <p>We are content with the extent of detailed analysis included in the FRA and therefore we have no further comments to make on the proposed drainage design.</p>	Comments noted
Pollution		Comments noted Conditions included

	<p>Having considered only the submitted supportive information relevant to our aspect of work i.e. Energy and Sustainability Statement Report prepared by Build Energy Ltd dated 13th April 2022 taken note of the applicant proposed use of air source heat pump and solar PV panels as the source of energy for the development with no on-site parking facilities as submitted in the application, please be advise that we have no objection to the proposed development in relation to AQ and Land Contamination but the following planning conditions and informative are recommend should planning permission be granted.</p> <p>However, where there is to be a change in the site energy source or provision is to be made for an on-site parking, an AQ Assessment and energy conditions will need to be recommend for the development and the application will need to come back to us for re-consideration at that stage. In the meantime, the following conditions are recommend.</p> <p>1. <u>Land Contamination</u></p> <p>Before development commences other than for investigative work:</p> <ol style="list-style-type: none"> A desktop study shall be carried out which shall include the identification of previous uses, potential contaminants that might be expected, given those uses, and other relevant information. Using this information, a diagrammatical representation (Conceptual Model) for the site of all potential contaminant sources, pathways and receptors shall be produced. The desktop study and Conceptual Model shall be submitted to the Local Planning Authority. If the desktop study and Conceptual Model indicate no risk of harm, development shall not commence until approved in writing by the Local Planning Authority. If the desktop study and Conceptual Model indicate any risk of harm, a site investigation shall be designed for the site using information obtained from the desktop study and Conceptual Model. The site investigation must be comprehensive enough to enable; a risk assessment to be undertaken, refinement of the Conceptual Model, and the development of a Method Statement detailing the remediation requirements. The risk assessment and refined Conceptual Model shall be submitted, along with the site investigation report, to the Local Planning Authority which shall be submitted to, and approved in writing by, the Local Planning Authority prior to that remediation being carried out on site. Where remediation of contamination on the site is required, completion of the remediation detailed in the method statement shall be carried out and a report that provides verification that the required works have been carried out, shall be submitted to, and approved in writing by the Local Planning Authority before the development is occupied. 	
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Reason: To ensure the development can be implemented and occupied with adequate regard for environmental and public safety.

2. Unexpected Contamination

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 as approved.

Reasons: 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 development site in line with paragraph 109 of the National Planning Policy Framework.

3. NRMM

- a. Prior to the commencement of the development, evidence of site registration at <http://nrmm.london/> to allow continuing details of Non-Road Mobile Machinery (NRMM) and plant of net power between 37kW and 560 kW to be uploaded during the demolition/construction phase of the development shall be submitted to and approved by the Local Planning Authority.

Reasons: To protect local air quality and comply with Policy 7.14 of the London Plan and the GLA NRMM LEZ

- b. Evidence that all plant and machinery to be used during the demolition and construction phases of the development shall meets Stage IIIB of EU Directive 97/68/ EC for both NOx and PM emissions shall be submitted to the Local Planning Authority.

Reasons: To protect local air quality and comply with Policy 7.14 of the London Plan and the GLA NRMM LEZ

- c. During the course of the demolitions, site preparation and construction phases, an inventory and emissions records for all Non-Road Mobile Machinery (NRMM) shall be kept on site. The inventory shall demonstrate that all NRMM is regularly serviced and detail proof of emission limits for all equipment. All documentation shall be made available for inspection by Local Authority officers at all times until the completion of the development.

Reasons: To protect local air quality and comply with Policy 7.14 of the London Plan and the GLA NRMM LEZ

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 planning authority 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 limited to 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;

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- 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 (July 2017) and shall provide details on:
- i. Dust Monitoring and joint working arrangements during the demolition and construction work;
 - ii. Site access and car parking arrangements;
 - 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 of facilities 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 the event of Local Authority Inspection;
 - iv. An inventory of NRMM currently on site (machinery should be regularly serviced, and service logs kept on 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.

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."

Informative:

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

I hope the above clarify our position on the application? Otherwise, feel free to contact us should you have any further query in respect of the application quoting M3 reference number WK/543814.

	The same comments were recieved on 6 July 2023 following re-consultation	
Housing	<p>The application sets out that the applicant wishes to develop the site of the existing Police Station. Block A the existing police building is to be retained and then a further two blocks added – Block B and Block C.</p> <p>Affordable housing provision</p> <p>The application seeks to deliver: 29 units in total: 10 houses and 19 flats. The units in Block A and Block B will be for private market sale and be a mixture of sizes. The units in Block C will be the affordable housing. The residential unit mix here will be 8 affordable housing units to 21 private for market sale units. The 8 units equate to 27.58% of all housing on the site. This is low.</p> <p>When assessing the proposal by habitable room as per <i>Appendix C – Affordable and Specialist/Supported Housing Guidance of Haringey's Housing Strategy 2018</i>, no comprehensive breakdown by habitable room was provided, details have been requested. However, some figures were available in <i>Table 2: Residential Unit Mix in Planning Statement – REV 00: 22/07/2021</i> (pg. 15). These figures have been used for habitable room calculations. My assessment is that there will only be 20 habitable rooms (affordable housing) out of the 103 habitable rooms (entire development). Should these figures be correct, this would represent 19.4% by habitable room compared with 80.5% for the remaining units (private market sale). This would not be compliant</p>	<p>Comments noted</p> <p>The proposed affordable housing dwelling mix provides a higher proportion of one bed units. Whilst this does not meet the Council's recommended dwelling mix for new affordable housing, Block C is constrained due to its layout and orientation and therefore 1 bed homes maximise the space within the block and in turn maximises the level of affordable units.</p>

with Haringey's Housing Strategy and Policies which states that the Council will seek 'to maximise the provision of affordable housing by requiring all development capable of providing 10 units or more residential units to provide affordable housing to meet an overall borough target of 40% by habitable rooms'.

On tenure split, the west of the borough does typically have lower provision of existing social rented homes, there is a need to deliver a higher percentage of the affordable homes in the rest of the borough outside the Tottenham AAP area as general needs housing – this is set out in detail in Appendix C of the Housing Strategy. The Council wishes to see as high a proportion as possible of the new affordable homes being delivered as homes for general needs. The tenure split of the affordable housing provided in this part of the borough should be 60% general needs low cost rented housing and 40% intermediate housing.

Dwelling mix

The recommended dwelling mix for the affordable housing is 10% x1beds, 45% x 2beds, 45% x3 beds (10% x4beds or more). The proposal outlined by the applicant provides the following number of units (accompanied by dwelling mix - percentage):

- 1bed 2persons x5 representing 62.5% of the proposed dwelling mix.
- 2beds 3persons x2 representing 25% of the proposed dwelling mix.
- 3beds 5persons x1 representing 12.5% of the proposed dwelling mix.

This does not meet Haringey's recommended dwelling mix for new affordable housing. The viability assessment provided is acknowledged.

Wheelchair adapted/adaptable units

As per the London Plan 3 units (10%) across the site will be wheelchair accessible and adaptable M4 (3) specification. The wheelchair accessible and adaptable units are however not across all tenures. X2 units in Block A and x1 unit in Block B will be to M4 (3) specification. Thus, none of the affordable housing units will be wheelchair adapted or adaptable for wheelchair users.

Rents

For low cost rented housing for general needs, the Council's preference is for Social Rent, however it recognises that the general needs homes delivered by most Registered Providers on schemes funded by the Mayor of London are likely to be at London Affordable Rent. We await further details on this. Social Rent or London Affordable Rent would be acceptable for the affordable housing units.

In addition, we would like to draw the applicants' attention to the following requirements relating to the pricing, allocation, letting, and marketing of the intermediate homes.

Pricing

The Council expects providers to ensure that all new affordable homes are genuinely affordable for Haringey residents.

The Council expects that Shared Ownership housing is priced so that net housing costs, including mortgage costs, rents, and service charges, should not exceed 40% of a household's net income.


As such, developers should be aware that Shared Ownership homes should be priced so that households with a maximum income of £40,000 for one- and two-bed properties, and £60,000 for larger properties will not spend more than 40% of their net income on mortgage costs, rents, and service charges.

To be clear, that 40% threshold relates to pricing and not to allocation and letting.

	<p>London Living Rent is required to be set at one third of average local household incomes.</p> <p>Allocation and letting of London Living Rent and Shared Ownership homes</p> <p>The Council's Intermediate Housing Policy requires that homes for Shared Ownership and London Living Rent (LLR) are targeted at households with a maximum income of £40,000 for one- and two-bed properties, and £60,000 for larger properties.</p> <p>Applicants for Shared Ownership must be first-time buyers unless they are purchasing to move into a larger home to meet their household needs.</p> <p>LLR homes must be limited to applicants with a gross household income of less than £60,000. However, they must be targeted at households with a maximum income of £40,000 for one- and two-bed properties.</p> <p>The Council is clear that local residents should benefit from new affordable housing and requires the use of priorities and marketing bands set out in the attached policy and summarised below. Developers are asked to note that robust mechanisms will be put in place to monitor and enforce these.</p> <p>Priorities are set to allocate properties when a number of individuals who meet the eligibility criteria have expressed an interest, and are as follows:</p> <p>Priority One:</p> <ul style="list-style-type: none"> • Haringey social housing tenants, including Housing Association tenants where Haringey has nominations rights to that property • Households on the housing register • Households who are required to move because of estate renewal, • Children of Haringey social housing tenants who are currently living with their parents <p>Priority Two</p> <ul style="list-style-type: none"> • Members of the armed forces • Applicants who live or work in the borough <p>Priority Three</p> <ul style="list-style-type: none"> • Any other applicants living or working in another London borough. <p>Where several applicants are in the same priority band, precedence will be given to households on the lowest income who meet the affordability criteria, and then to the applicant who first expressed an interest in the property.</p> <p>Marketing intermediate housing</p> <p>The Council sets clear guidelines for the marketing of intermediate products in order to ensure that these priorities are achieved.</p> <p>The attached Intermediate Housing Policy requires that intermediate housing is marketed in a phased way, with those living or working in Haringey with a maximum annual income of £40,000 for 1 and 2 bed properties and £60,000 for larger properties being prioritised until three months after completion.</p>	
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	<p>Comments received dated 06/07/2023</p> <p>Thank you for asking for additional comments following the submission/completion of the viability assessment for the above site.</p> <p>As per the Housing Strategy and Policy team's submission in September 2022, we would like to see the Affordable Housing offer closer to 40% by habitable room. We welcome though that the current affordable proposals are for London Affordable Rent (LAR) tenure.</p> <p>On the dwelling mix, it remains our view that the current mix is very 1-bed heavy and does not follow the recommended dwelling mix for new homes in the borough as set out in the Housing Strategy – our preferred mix is based on the size of homes needed by residents in the borough. As such if this could be reconfigured to provide fewer 1-beds and more of the much-needed family sized accommodation this would be welcomed; even if this resulted in slight reduction in units, it could still increase the Affordable Housing by Habitable Room and better balance the dwelling mix. We'd be happy to review this application again should further changes be made.</p> <p>Understandably viability would need to be considered here as well. The issue of viability is for planning to consider.</p> <p>In summary, as it stands the applicant proposes 8 (LAR) homes of 29 homes – x5 1B2P, x2 2B3P and x1 3B5P.</p>	
Tree Officer	<p>Officer comment dated 07 September 2022</p> <p>From an arboricultural point of view, I hold no objections to the proposal as there are no tree issues on site or trees to be incorporated into the development.</p>	Comments noted

	<p>We await the finalised master landscaping plans, specification and aftercare programme</p> <p>Officer comment dated 27 June 2023</p> <p>I am satisfied with the scope of comprehensive design, chosen trees and plant diversity</p>	
Public Health	<p>Response on storage:</p> <p>Thank you for clarifying the storage space meets London Housing Guidelines.</p> <p>Response on private amenity space:</p> <p>Although it is disappointing not to include private outdoor amenity space per unit, especially in light of the negative health impacts we have learnt through households not having a private outdoor space during the COVID-19 pandemic. We understand due to Heritage and Conservation restrictions that this cannot happen. This makes provision of a welcoming and inclusive communal space even more of a priority.</p> <p>Response to access and wheelchair accessible units:</p> <p>It is good to see the wheelchair units moved to Block A with level private access and a platform lift access for Block B. Will there be update plans shared?</p> <p>Response to play provision:</p> <p>We agree the shared amenity space is for everyone and accessibility is a key design element and Public Health would like to be assured the designs reflect this. It is great to hear you have highlighted the informal play space area and it would be useful to see a clearer design to ensure alignment with London Plan: Policy S4 Play and informal recreation and Haringey Council's Strategic Policy 13 Open Space and Biodiversity: "provide play spaces that are attractive, welcoming and engaging for all children and young people, children of both gender, disabled children and children from minority groups in the community".</p>	<p>Comments noted.</p> <p>The wheel chair accessible units are located in block B. A platform lift will be installed in block B</p> <p>Detailed design of the play equipment will be confirmed via condition</p> <p>The applicants have amended the ground floor plan of Block B to suit your comments on the cycle parking. The door to the rear of the 'connecting piece' has been removed to ensure that there are only 2 doors to access the cycle store. A</p>

	<p>We would like clarity on the image below (in reference to Landscape Strategy, page 5). It is stated that this is the natural stone slab layered to form the hexagonal stages. The surface and edges do not seem to look safe for children.</p>  <p>1. Horizontal stone image</p> <p>Response on access to cycle storage: Noted that a platform lift to Block B will be included and whole development will be built in accordance with Part M, we look forward to seeing this revised inclusion.</p> <p>We appreciate from a potential maintenance perspective a bike can be seen as a nuisance coming through a main lobby but the London Cycling Design Standards by the GLA states, in Chapter 8 Cycle Parking, that “accessing the parking area should involve passing through no more than two sets of doors” and at present it is three sets of doors. The concern here is around making cycling the more accessible and appealing option in this development and ensuring cycle storage is easy and safe to use, especially on a site with local parking constraints highlighted as an issue. This is line with Haringey Council’s SP7 Transport “promoting public transport, walking and cycling (including minimum cycle parking standards)” and is a Public Health preference to promote healthy, active lifestyles.</p> <p>As mentioned, please do let us know if there is anything you would like to discuss further.</p>	<p>secondary door is proposed between the connecting piece and the Block B lobby to keep it weatherproofed and secure. From a design perspective, this amendment also enables the central garden area to be more visible from the street and creates a stronger sense of active frontage.</p>
EXTERNAL		

Thames Water	<p>Waste Comments The proposed development is located within 15 metres of a strategic sewer. Thames Water requests the following condition to be added to any planning permission. "No piling shall take place until a PILING METHOD STATEMENT (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement." Reason: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to significantly impact / cause failure of local underground sewerage utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. https://www.thameswater.co.uk/developers/larger-scale-developments/planning-yourdevelopment/working-near-our-pipes Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB</p> <p>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. https://www.thameswater.co.uk/developers/larger-scale-developments/planning-yourdevelopment/working-near-our-pipes</p> <p>We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Groundwater discharges typically result from construction site dewatering, deep</p>	<p>Comments noted. Condition/Informativ e included</p>
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	<p>excavations, basement infiltration, borehole installation, testing and site remediation. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. Should the Local Planning Authority be minded to approve the planning application, Thames Water would like the following informative attached to the planning permission: "A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 020 3577 9483 or by emailing trade.effluent@thameswater.co.uk . Application forms should be completed on line via www.thameswater.co.uk. Please refer to the Wholesale; Business customers; Groundwater discharges section.</p> <p>With regard to SURFACE WATER drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water we would have no objection. Management of surface water from new developments should follow guidance under sections 167 & 168 in the National Planning Policy Framework. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. Should you require further information please refer to our website. https://www.thameswater.co.uk/developers/larger-scale-developments/planning-yourdevelopment/working-near-our-pipes</p> <p>Water Comments The applicant is advised that their development boundary falls within a Source Protection Zone for groundwater abstraction. These zones may be at particular risk from polluting activities on or below the land surface. To prevent pollution, the Environment Agency and Thames Water (or other local water undertaker) will use a tiered, risk-based approach to regulate activities that may impact groundwater resources. The applicant is encouraged to read the Environment Agency's approach to groundwater protection (available at</p>	
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	<p>https://www.gov.uk/government/publications/groundwater-protection-positionstatements) and may wish to discuss the implication for their development with a suitably qualified environmental consultant</p> <p>On the basis of information provided, Thames Water would advise that with regard to water network infrastructure capacity, we would not have any objection to the above planning application. Thames Water recommend the following informative be attached to this planning permission. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.</p> <p>The proposed development is located within 5m of a strategic water main. Thames Water do NOT permit the building over or construction within 5m, of strategic water mains. Thames Water request that the following condition be added to any planning permission. No construction shall take place within 5m of the water main. Information detailing how the developer intends to divert the asset / align the development, so as to prevent the potential for damage to subsurface potable water infrastructure, must be submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any construction must be undertaken in accordance with the terms of the approved information. Unrestricted access must be available at all times for the maintenance and repair of the asset during and after the construction works. Reason: The proposed works will be in close proximity to underground strategic water main, utility infrastructure. The works has the potential to impact on local underground water utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. https://www.thameswater.co.uk/developers/larger-scale-developments/planning-yourdevelopment/working-near-our-pipes Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk.</p>	
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	<p>The proposed development is located within 15m of a strategic water main. Thames Water request that the following condition be added to any planning permission. No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface water infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement. Reason: The proposed works will be in close proximity to underground water utility infrastructure. Piling has the potential to impact on local underground water utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. https://www.thameswater.co.uk/developers/larger-scaleddevelopments/planning-your-development/working-near-our-pipes Should you require further information please contact Thames Water. Email:developer.services@thameswater.co.uk</p> <p>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 3 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://www.thameswater.co.uk/developers/larger-scale-developments/planning-yourdevelopment/working-near-our-pipes</p> <p>The proposed development is located within 15m of our underground water assets and as such we would like the following informative attached to any approval granted. The proposed development is located within 15m of Thames Waters underground assets, as such the development could cause the assets to fail if appropriate measures are not taken. Please read our guide 'working near our assets' to ensure your workings are in line with the necessary processes you need to follow if you're considering working above or near our pipes or other</p>	
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	<p>structures. https://www.thameswater.co.uk/developers/larger-scaleddevelopments/planning-your-development/working-near-our-pipes Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk</p>	
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<p>Secure By Design</p>	<div data-bbox="489 224 1524 485" style="border: 1px solid black; padding: 5px;"> <p>Application Number: HGY/2022/2116</p> <p>Location: Hornsey Police Station 98 Tottenham Lane N8 7EJ</p> <p>Proposal: Retention of existing Police Station building (Block A) with internal refurbishment, rear extensions and loft conversions to create 6 terrace houses and 4 flats. Erection of two buildings comprising of Block C along Glebe Road and Harold Road to create 8 flats and erection of Block B along Tottenham Lane and towards the rear of Tottenham Lane to create 7 flats and 4 mews houses including landscaping and other associated works</p> </div> <p>Dear Haringey Planning,</p> <p><u>Section 1 - Introduction:</u></p> <p>Thank you for allowing us to comment on the above planning proposal.</p> <p>With reference to the above application we have had an opportunity to examine the details submitted and would like to offer the following comments, observations and recommendations. These are based on relevant information to this site (Please see Appendices), including my knowledge and experience as a Designing Out Crime Officer and as a Police Officer.</p> <p>It is in our professional opinion that crime prevention and community safety are material considerations because of the mixed use, complex design, layout and the sensitive location of the development. To ensure the delivery of a safer development in line with L.B. Haringey DMM4 and DMM5 (See Appendix), we have highlighted some of the main comments we have in relation to Crime Prevention (Appendices 1).</p> <p>I can confirm we have not met with the project design team to review Safety, Security or Crime Prevention.</p> <p>We have concerns around some aspects of the design and layout of the development. At this point it can be difficult to design out fully any issues identified. At best crime can only be mitigated against, as it does not fully reduce the opportunity of offences.</p> <p>Whilst in principle we have no objections to the site, we have recommended the attaching of suitably worded conditions and an informative. The comments made can easily be mitigated early if the Architects ensure the ongoing dialogue with our department continues throughout the design and build process. This can be achieved by the below Secured by Design conditions being applied (Section 2). If the Conditions are applied, we request the completion of the relevant SBD application forms at the earliest opportunity.</p>	<p>Conditions/informative included</p>
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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.

Informative:

The applicant must seek the continual advice of the Metropolitan Police Service Designing Out Crime Officers (DOCs) to achieve accreditation. The services of MPS DOCs are available **free of charge** and can be contacted via docmailbox.ne@met.police.uk.

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 **Decision Notice**, with attention drawn to any changes within the development and subsequent Condition that has been implemented 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 please do not hesitate to contact us at the above office.

Yours sincerely,

Ian Waylen 1973CO

Designing Out Crime Officer
Metropolitan Police Service

<p>TfL</p>	<p>Having assessed the proposals, I can confirm that TfL Spatial Planning has no strategic comments to make on this planning application but has these specific observations:</p> <p>The development should comply with the transport policies set out in The London Plan 2021. In particular the car and cycle parking standards in tables 10.2 – 10.6 (inclusive). Cycle parking should comply with the London Cycling Design Standards (https://tfl.gov.uk/corporate/publications-and-reports/streets-toolkit).</p> <p>If the development is permitted I recommend the developer is reminded of the following: Tottenham Lane supports bus routes 41, N41 and N91. In the event that implementation of the development impacts users of those services such as alighting or accessing bus stops or requires the temporary re-routeing of bus services or other such arrangements, these must be agreed with TfL before the work. All vehicles associated with the development must only park / stop at permitted locations and within the time periods permitted by existing on-street restrictions.</p> <p>It is vital that construction work associated with the development is carried out in accordance with best practice, minimising impact upon vulnerable road users including cyclists on surrounding streets. TfL strongly encourages the use of construction contractors who are registered on the Fleet Operator Recognition Scheme and adhere to the CLOCS standard. Contractor vehicles should include side-bars, blind spot mirrors and detection equipment to reduce the risk and impact of collisions with other road users and pedestrians on the capital's roads. Further information can be found here: https://constructionlogistics.org.uk/.</p> <p>Comments received dated 05/07/2023</p> <p>Many thanks for consulting TfL on the above application; however considering the scale, nature and location of the proposal TfL has no objections or comments to provide.</p>	<p>Comments noted/informative included</p>
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London Fire Brigade	<p>The London Fire Commissioner (the Commissioner) is the fire and rescue authority for London. The Commissioner is responsible for enforcing the Regulatory Reform (Fire Safety) Order 2005 (as amended) in London.</p> <p>The Commissioner has been consulted with regard to the above-mentioned premises and makes the following observations:</p> <p>The Commissioner is satisfied with the proposals</p> <p>Other comments: Providing you provide sprinkler protection to extend the hose distance to 75m in houses that do not meet the 45m hose length in accordance with BS 9991 as outlined in your fire statement. As per Approved Document B B5 for access and facilities for the fire service.</p>	<p>Comments noted/informative included</p>
Neighbouring Properties	<p>Land Use and housing</p> <ul style="list-style-type: none"> - No affordable housing provision - Excessive number of dwellings proposed - Concerns the affordable housing is in a separate block - There should be no distinction between the private and affordable blocks - Concerns the affordable housing does not meet required space standards 	<p>Land Use and housing</p> <p>There is affordable housing provision.</p> <p>The number of dwellings proposed do not generate design or density concerns</p> <p>The affordable block would be of the same high quality residential scheme as the private block and all housing</p>

	<ul style="list-style-type: none"> - Concerns with the viability of the scheme - The level of social housing should be increased - On site affordable housing should not be exchanged for a commuted sum <ul style="list-style-type: none"> - Affordable housing and extra care sheltered housing should be a priority - Flat C2 has no dedicated amenity space and no view to the communal garden <ul style="list-style-type: none"> - The site should be retained to benefit the local community - The loss of the police station will result in more crime in the area 	<p>meets the required space standards.</p> <p>The Council's independent viability consultant has reviewed the applicant's viability report and found that the proposal provides the maximum viable amount of affordable housing</p> <p>Delivery of housing is essential to meeting Local Plan Housing targets.</p> <p>As noted in the principle of development section, the disposal of the former Police Station site forms part of a wider programme to deliver public services and that the Borough Commander has</p>
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	<p>Impact on Heritage Assets</p> <ul style="list-style-type: none"> - Design not in keeping with the Conservation Area - The height is not in keeping with the Conservation Area - The internal building should be refurbished rather than extended - Aluminium windows should not be allowed in the Conservation Area - The existing police station façade should be retained - Harm to the Conservation Area 	<p>provided assurances that the policing of the area will remain available to meet the ongoing needs of the local population the proposed loss of the police station is considered acceptable</p> <p>Impact on Heritage Assets</p> <p>The proposed development will lead to a very low, less than substantial harm to the significance of the conservation area and its assets that is outweighed by the several significant public benefits of the development. The remainder of the scheme is considered to preserve the character and</p>
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	<p>Size, Scale and Design</p> <ul style="list-style-type: none"> - The design is not in keeping with surrounding properties - The design is not in keeping with the existing Police Station building - The design of block C is bland - The design lacks character - The communal garden needs soft landscaping - Poor quality design - The scheme should be redesigned - The development should be significantly reduced in scale - Excessive height, bulk, massing and scale of block B - Concerns with the exact height of the mews houses - Overbearing in relation to neighbouring buildings - Overdevelopment of site - The design of the new blocks should be similar to the retained police station building - The low boundary wall on Tottenham Lane should be repaired - Block C should be set further back from the pavement - The skyline will be obscured by the development - The amendments to the scheme are not sufficient <p>Impact on neighbours</p> <ul style="list-style-type: none"> - Loss of privacy/overlooking/overshadowing - A daylight assessment should be carried out - Loss of daylight and sunlight - Noise and disturbance - The balconies of the mews houses at first floor level should be removed - The development is in close proximity to the Firemans Cottages 	<p>appearance of the conservation area.</p> <p>Size, Scale and Design</p> <p>From a design point of view, the proposed design and scale of the development remains a high-quality design that is in-keeping with the approved development and surrounding area in line with the relevant policies</p> <p>This proposed development is considered appropriate in this location</p> <p>Impact on neighbours</p>
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	<p>Parking, Transport and Highways</p> <ul style="list-style-type: none"> - Pressure on parking - Road safety concerns - EV charging points should be provided for parking and cycle storage - The central communal space should be retained for parking - Parking should be provided - Concerns with delivery and servicing vehicles using the mews lane - Parking permits should be restricted for future occupants - Concerns parking with take place outside CPZ operation times - Disabled parking bays should be provided - Underground parking should be considered <p>Environment and Public Health</p> <ul style="list-style-type: none"> - Significant increase in pollution - Increased emissions - Noise pollution 	<p>As noted in the neighbouring amenity section the proposal would not have a significant impact on neighbouring properties in terms of privacy, daylight or sunlight. The proposal will not result in any greater noise or light levels than should be expected in an urban area.</p> <p>Parking, Transport and Highways</p> <p>The Transportation Officer has assessed these points and which have been covered in the main body of the report and concludes that the proposed development is considered acceptable, in regard to transport</p>
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	<ul style="list-style-type: none"> - Major disruption to the local community - Impact on the quality of life of local residents - Dust concerns 	<p>impacts</p> <p>Environment and Public Health</p> <p>Any dust and noise relating to demolition and construction works would be temporary impacts that are typically controlled by non-planning legislation. Nevertheless, the demolition and construction methodology for the development would be controlled by the imposition of a condition</p> <p>As noted in the air quality section an Air Quality Assessment is required which Officers are satisfied can be adequately addressed at a later stage, and as such this matter can be secured by the</p>
	<ul style="list-style-type: none"> - Pressure on existing infrastructure 	

	<ul style="list-style-type: none"> - The courtyard space should be publicly accessible - The applicants should consider a new tree at the pedestrian crossing to provide more screening - Insufficient refuse provision - Planting will need to be maintained well 	<p>imposition of a condition.</p> <p>The scheme would provide CIL payment towards local infrastructure.</p> <p>The courtyard space being gated will help prevent anti-social behaviour</p> <p>Adequate new trees are provided within the communal amenity space</p> <p>The Council's Waste Management Officer is satisfied with the proposed arrangement for the refuse/recycling bin collection.</p> <p>The long term management of the planting is secured via a condition</p>
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Appendix 4 QRP Reports

CONFIDENTIAL



London Borough of Haringey Quality Review Panel

Report of Formal Review Meeting: Hornsey Police Station

Wednesday 27 April 2022

Clockwise, Greenside House, 50 Station Road, London N22 8LE

Panel

Peter Studdert (chair)
Phil Armitage
Louise Goodison
Phyllida Mills
David Ubaka

Attendees

Robbie McNaugher	London Borough of Haringey
John McRory	London Borough of Haringey
Richard Truscott	London Borough of Haringey
Joe Brennan	Frame Projects
Kate Trant	Frame Projects

Apologies / report copied to

Valerie Okeiyi	London Borough of Haringey
Aikaterini Koukouthaki	London Borough of Haringey
Sam Uff	London Borough of Haringey

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.

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1. Project name and site address

Homsey Police Station, 98 Tottenham Lane, N8 7EJ

2. Presenting team

Chris Boyle	Archanaeum
Kuan Leng	Dixon 8
Rie Nijo	Rie Nijo Architects

3. Planning authority briefing

The site is located on the corner of Harold Road and Tottenham Lane in Hornsey, in the Hillfield Conservation Area. Immediately south of the carpark / service yard, partially comprising the site, is a row of two-storey houses on Church Lane, and to the southwest is the two-storey Firemans Cottages and two-storey terraced houses on Glebe Road. Tottenham Lane local centre is immediately east of the site, comprising a shopping parade with commercial units at ground floor and residential flats above.

The principal building currently occupying the site is the 'L'-shaped, part two-storey, part three-storey Homsey Police Station, built in 1915. Built of red brick with terracotta banding and window surrounds, the police station replaced an earlier one, c1868, and originally formed part of a group of civic buildings including a public library and fire station. Access to the police station's carpark/service yard is off Harold Lane.

The proposal comprises the refurbishment and extension of Homsey Police Station and the construction of two new residential buildings to provide 30 units and associated landscaping.

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4. Quality Review Panel's views

Summary

The panel broadly supports the proposals for Homsey Police Station, feeling that it has the potential for a high-quality scheme. The conceptual approach of 'weaving the past with the present' is promising in the context of the conservation area and existing historic building. However, it recommends that this idea is developed further. For example, it suggests that Block C could be more exuberant, using cues from the conservation area, to give this important corner block greater presence. The scale of Blocks A and B at Tottenham Lane seems appropriate given the surrounding area. However, the panel questions the scale of the mews housing element of Block B, which it suggests is likely to be more viable at two storeys than three. The panel is also concerned about how the level changes across the site are addressed currently and recommends further detailed sectional analysis of this aspect of the scheme. Similarly, the panel is not yet convinced by the proposed layouts of individual residential spaces and suggests further detailed consideration of this in order to improve the quality of the interior spaces. The panel has some concerns about the scheme's environmental and energy strategy, commenting that these appear to be being considered late in the scheme's development. It also has some concerns about the complexity of the landscaping of the internal courtyard.

Architecture

- The panel admires the conceptual approach to 'weaving the past with the present' and its potential to underpin the architectural approach. However, it feels that this concept would be further strengthened if more rigorously applied across the whole scheme.
- The panel would encourage retention of the existing police station staircases in Block A.
- The panel supports the use red brick throughout the scheme, seeing it as appropriate to the immediate context and adjacent conservation area, and in keeping with the materiality of the existing police station.
- it feels that the concept of 'weaving' could be taken much further to add variation, depth and interest to the facades and to the overall scheme.
- The panel questions the type and placement of the windows at various locations in the scheme. Further consideration of these may lead to improvements in the quality of daylight brought into the interiors across the development, as well as its external appearance.
- The panel is not yet convinced by the roof detailing of the new-build section of Block A and recommends careful consideration of the choice of materials for this roof, including the gutter detailing.



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- In relation to the above point, improving the quality of light brought into the top floor apartments in Block A will be a key determinant of the design of the roof.
- The panel admires the way that the Block B entrance offers a direct view into the courtyard, suggesting that decisions about the cladding of the entrance will be key to the success of its design.

Interior layouts

- The panel recommends further detailed consideration of the internal layouts of the houses and flats, to maximise the quality of the interior spaces for the users.
- For example, one of the new-build flats on Tottenham Lane proposes a dining area with no window. The panel appreciates that this is to prevent overlooking of the refuse store but suggests further thought about the quality of this unit.

Block C

- The panel suggests that Block C could be more exuberant, using cues from the conservation area, to give this important corner block greater presence.
- The panel asks for further thought about the relationship between Block C and the adjacent Firemans Cottages, where currently its first and second floor balconies are tight against the gable end walls.

Block B mews

- The panel is concerned about the mews component of Block B and the proposed scale of the houses at three storeys, where it feels that two storeys would be more appropriate.
- The associated problems caused by large, three- and four-bedroom houses in relation to provision for private vehicles / parking are also a concern, as is the restricted size of their living / dining spaces.
- The panel also suggests that two storeys will be more compatible with the narrow entrance to the mews from Tottenham Lane, and that the materiality of this entrance will be important to the success of that significant corner of the scheme.

Scheme layout

- The panel suggests relocating the refuse stores currently along Tottenham Lane. Whilst this location is ideal for refuse collection, there is a risk they will have a negative impact on that street frontage.



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- The panel recommends further sectional analysis of the two-metre level change across the site. Currently, this appears to be creating some uncomfortable relationships between elements of the development.
- For example, if the mews level was brought to the level of the courtyard space, this might increase the sense of this as a single generous garden space.

Landscape

- The panel feels that the courtyard is a generous offer, but that its design is overcomplicated by the introduction of multiple levels and recommends further consideration of this aspect of the landscape design.
- For the courtyard to be successful as a shared space, it will be important to resolve its relationship with the surrounding private gardens. For example, boundary treatments will need careful thought to ensure the courtyard is welcoming and attractive.
- The panel recommends further thought about how the landscape design responds to the site's sunpath.

Parking strategy

- The panel recognises the work done on the parking strategy so far, particularly given the complexities of changes to the local parking provision. It recommends that the details—particularly of the disabled parking—are pinned down swiftly.
- The panel recommends that further clarity is sought from the council regarding the extent to which parking previously allotted to the police station will contribute to the scheme's provision.
- Providing additional electric vehicle charging points on surrounding streets could contribute well to the parking strategy, which is not intended to increase the parking provision in the area.

Sustainability

- Further thought is needed to refine the development's environmental and energy approach. For example, it highlights that PVs located on flat roofs of the three-bedroom houses may be overshadowed by the second floor accommodation to their south.
- Generally, the panel recommends the positioning of PVs on roofs should be thought of as an integral part of the overall design approach.
- The panel suggests that the development's heating strategy could be improved with heat pumps rather than electric boilers.
- If heat pumps are provided, their location will need careful thought in terms of noise and visual impact.



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- The environmental and heritage aspects of retaining the existing single-glazed windows need to be developed further.
- The panel suggests the introduction of secondary glazing or new double glazed sash windows to match the existing appearance.
- The panel questions the scheme's form factor; the large surface area of the scheme poses a challenge in terms of thermal efficiency.

Next steps

The panel would be pleased to consider the proposals again at a chair's review, if required.



London Borough of Haringey Quality Review Panel

Report of Chair's Review Meeting: Hornsey Police Station

Wednesday 17 August 2022

Room 5M1, Clockwise Wood Green, Greenside House, 50 Station Road, London N22 7DE

Panel

Peter Studdert (chair)
Louise Goodison

Attendees

Rob Krzyszowski	London Borough of Haringey
Robbie McNaugher	London Borough of Haringey
Valerie Okeiyi	London Borough of Haringey
Richard Truscott	London Borough of Haringey
Kate Trant	Frame Projects
Joe Brennan	Frame Projects

Apologies / report copied to

Suzanne Kimman	London Borough of Haringey
Aikaterini Koukouthaki	London Borough of Haringey
John McRory	London Borough of Haringey
Elizabetta Tonazzi	London Borough of Haringey
Deborah Denner	Frame Projects

1. Project name and site address

Homsey Police Station, 98, 96 and 94 Tottenham Lane, London N8 7EJ

Planning application reference: HGY/2022/2116.

2. Presenting team

Chris Boyle Archanaeum

3. Planning authority briefing

The site is located on the corner of Tottenham Lane, Harold Road and Glebe Road in Homsey, to the west side of Tottenham Lane / north side of Harold Road / east side of Glebe Road. The existing building is 'L'-shaped in form and comprises a retained part two-storey, part three-storey building known as Homsey Police Station, primarily fronting Tottenham Lane, with a long lower wing fronting Harold Road.

The site has a PTAL rating of 4, considered 'good' access to public transport services. Five different bus services are accessible within three to five minutes' walk of the site, and Homsey Railway Station is a five- to six-minute walk away.

The site is located within the Hillfield Conservation Area, which also includes the Fireman's Cottages and all the other properties on Harold Road, but no other properties or spaces on Tottenham Lane, Church Lane or Glebe Road. The prominently sited police station building, together with its tall red brick boundary walls, makes a positive contribution to the character and appearance of this part of the conservation area.

Since the previous Quality Review Panel meeting, the applicants have revised the scheme in response to the panel's and officers' comments, pre-app presentation to the planning committee and ward members and their public consultation. A planning application has now been submitted.

Officers support the principle of converting the existing police station and redeveloping the remainder of the site for residential use, subject to reassurances that it will not result in the overall reduction in public safety / policing services in the locality and the borough more generally.

The panel's formal response to the submitted scheme is requested.



4. Quality Review Panel's views

Summary

The panel appreciates the applicant's constructive response to comments made at the previous Quality Review Panel meeting (27 April 2022), and the subsequent improvements to the proposal, and is broadly supportive of the scheme. The panel feels that the revised proposal has the potential to create a high-quality development that will make a positive contribution to the local area. The architecture of the proposed new residential blocks seems appropriate given the materiality and scale of the largely brick Victorian and Edwardian buildings of the surrounding area. The panel still feels that the elevation of Block C at the corner of Glebe Road and Harold Road facing the conservation area needs more variety in materials. The panel also encourages further thought about the security of windows at low level, which need to be fully openable to maximise ventilation. It supports the layout and landscaping of the shared courtyard, and the design approach to the three gateways to the development, on Tottenham Lane and Harold Road. The panel emphasises the importance to the scheme's success of carrying through the detailing, to prevent its being subject to value-engineering as it approaches construction.

Architecture

- The panel is supportive of the 'weaving past and present' theme and feels that the new-build aspects of the scheme bring contemporary ideas to the development that sit well alongside the existing building.
- The panel underlines the importance of ensuring high-quality detailing throughout the scheme and that this cannot be diminished through value-engineering.
- The panel welcomes the progress made in the development of the internal layouts of the flats, which it sees as an improvement on the previous proposals.
- The panel suggests further consideration of the scheme's window detailing in relation to ventilation and safety, particularly in Block C. This might include the introduction of guardrails, or alternatives to fully opening windows.
- The panel still feels that, in contrast to the rich palette of the conservation area, the appearance of Block C is too uniform in texture and, in particular, is pleased that the Glebe Road elevation will be considered further.
- The panel has reservations about using brick as the roofing material for Block C — where, given the local context, this might be expected to be slate — but appreciates that this forms part of the 'weaving' theme. If brick is to be used, the panel stresses the importance of ensuring that this aspect of the scheme is well detailed in order to create a richness of texture.



- The panel finds successful the way that the architecture of the new additions flows from the existing police station frontage and is also happy that each unit has a 'front' and a 'back'.

Access strategy

- The panel supports the re-positioning of the refuse / bin stores on the site, feeling that, as well as eliminating their negative impact on the Tottenham Lane frontage, the new locations will be more functional.
- It also welcomes the parking provision for wheelchair-accessible and family units, noting that on-street parking for the development will be for 13 spaces (an increase of two spaces from the dedicated police parking of 11).
- The panel feels that access to the wheelchair-accessible units in Block B has been adequately addressed by the inclusion of a platform lift where there are three steps, level access to the lift, ample circulation space and access into / out of units, acknowledging that the details are to be finalised.

Landscape

- The panel welcomes the simplification of levels of the interior courtyard, the softer separation using trees and planting, and the more integrated landscaping, feeling that these revisions have created a calmer environment. As elsewhere, the panel stresses the importance of the high-quality detailing of this aspect of the development.
- Equally, the panel highlights that management of the development's communal spaces will be key to its success.

Next steps

The panel is confident that the issues outlined above can be addressed by the project team in consultation with Haringey officers and, on this basis, is happy to support the scheme.

Appendix 5 - Development Forum minutes

- Query on turning the corner at Glebe Road
- Out of keeping with the character of the area
- No defensible space
- The neighbouring houses have front gardens
- Too close to the corner
- Concerns the affordable housing block is different in character to the rest of the existing building
- Impact on neighbouring building from mews houses
- The mews houses will tower over the neighbours
- Overlooking/loss of privacy concerns
- Parking pressures
- Concerns with delivery/servicing vehicles
- Issue raised about refuse collection and emergency vehicles
- Subsidence to neighbouring properties from the mews house development
- Structural concerns
- Overbearing
- No CGI provided from the gardens of the neighbours on Church Lane and Glebe Road
- Impact on parking
- Parking permits will have a major impact
- Who will be responsible for the landscaping
- Block C the affordable block looks very plain
- There are no trees facing the street
- How about visitor permits
- The corner façade of block C on Glebe Road and Harold Road is imposing. Its needs to be softer in appearance
- Disruption from building works
- Query on parking capacity
- Concerns with construction vehicles
- Block C looks cheaper because it is the affordable block
- Who owns the police station site
- Will the Council commission their own traffic study
- Concerns with flytipping/overflowing refuse

Appendix 6 - Pre-application Committee minutes

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Agenda Item 6

Pre-Application Briefing to Planning Sub-Committee – Monday, 11 July 2022

1. DETAILS OF THE DEVELOPMENT**Reference No:** PPA/2022/0006**Ward:** Hornsey**Address:** Hornsey Police Station 98 Tottenham Lane N8 7EJ

Proposal: Retention of existing Police Station building (Block A) with internal refurbishment, rear extensions and loft conversions to create 6 terrace houses and 4 flats. Erection of two buildings comprising of Block C along Glebe Road and Harold Road to create 8 flats and erection of Block B along Tottenham Lane and towards the rear of Tottenham Lane to create 7 flats and 4 mews houses including landscaping and other associated works

Applicant: Kuan Wai Leng Koukan Developments Ltd**Agent:** Kuan Wai Leng Koukan Developments Ltd**Ownership:** Private**Case Officer Contact:** Valerie Okeiyi**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 the planning application. Any comments made now are of 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 November / December 2022. The applicant is currently engaged in pre-application discussions with Haringey Officers.

3. SITE AND SURROUNDS

- 3.1 The site is located on the corner of Harold Road and Tottenham Lane in Hornsey and to the north side of Harold Road/West side of Tottenham Lane. The building occupying the site is 'L' shaped in form and comprises a part two storey, part three storey building known as Hornsey Police Station. There are a number of ad-hoc single-storey structures contained within the service yard/car park which is accessed off Harold Road.
- 3.2 Immediately south of the car park/service yard is a row of two storey terrace houses on Church Lane and to the south west is the two storey building known as Fireman's Cottages and two storey terrace houses on Glebe Road.

Tottenham Lane Local Centre is located immediately east of the site and comprises of a shopping parade with commercial units on the ground floor and residential flats on the upper floors

- 3.3 The site has a public transport accessibility level (PTAL) of 4, considered 'good' access to public transport services. Five different bus services are accessible within 3 to 5 minutes' walk of the site, and Hornsey Railway Station is a 5 to 6 minute walk away.
- 3.4 The site is located within the Hillfield Conservation Area. The prominently sited Police Station building together with its tall red brick boundary walls, makes a positive contribution to the character and appearance of this part of the conservation area.

4. PROPOSED DEVELOPMENT

4.1 The proposed works would involve:

- The conversion of the existing Police Station (Block A) to residential units and the redevelopment of land around it (Blocks B and C) to create 29 flats/houses in total;
- Block A, along Tottenham Lane and Harold Road will include internal refurbishment, rear extensions and loft conversions and would comprise of 6 terrace houses and 4 flats;
- Block B (new build), along Tottenham Lane and towards the rear of Tottenham Lane would be 3 to 4 storeys in height and comprise of 7 flats and 4 mews houses;
- Block C (new build), along Glebe Road and Harold Road will be 3 storeys in height and comprise of 8 flats;
- Houses 1 and 2 in Block A and flat B3 on the first floor of Block B would be wheelchair accessible;
- Associated rationalised landscaping including, public realm improvements including amenity space and playspace;
- Cycle stores;
- Bin stores;
- Car free development with 3 wheelchair accessible onstreet parking bays on Harold Road.

5. PLANNING HISTORY

- 5.1 The site has planning history dating back to 1993 but nothing relevant to the scheme at pre-application stage.

6. CONSULTATION

6.1 Public Consultation

- 6.2 This scheme is currently at pre-application stage and therefore no formal consultation has been undertaken as yet. However, the applicant has recently undertaken their own pre-application engagement with the local community which consisted of a wide scale leaflet drop to properties in the local area informing residents of the pre-application scheme together with an arranged exhibition hosted by the developers which included a presentation of the scheme to local residents who attended

6.3 Quality Review Panel

- 6.4 The proposal was presented to the Quality Review Panel (QRP) on 27 April 2022. The report from the QRP Formal Review is attached as **Appendix 1**.
- 6.5 The Panel broadly supports the proposals for Homsey Police Station, stating that the scheme is showing potential for achieving a high-quality scheme. The conceptual approach is supported in the context of the conservation area and the existing historic building (former police station). However, the panel did express suggestions of how the scheme could be improved and what aspects of the scheme required further thought and work. The panel was satisfied for officers to pursue further discussions with the developer and that it did not need to be presented to the QRP again.
- 6.6 Following the QRP meeting, the scheme has been amended in order to address officer and QRP comments and suggestions.

6.7 Development Management Forum

- 6.8 The pre-application proposal is to be presented at a Development Management Forum on 5th July 2022. Comments received will be fed back verbally to members on the 11th July.

7. MATERIAL PLANNING CONSIDERATIONS

- 7.1 The Council's initial views on the development proposals are outlined below:

Principle of the development

The Police Station currently occupying the site has been closed and redundant for some time – the closure of Homsey Police Station formed part of the Metropolitan Police Service's rationalisation and investment programme to close old outdated buildings to reduce costs and provide modern, new facilities to support future policing across London. The money raised from the sale of the site is re-invested into modern ways of working, and supporting the Mayor's Office for Policing and Crime (MOPAC)'s Police and Crime Plan 2017 - 2021.

Although the Police Station has been closed and un-operational for some time now, in land use planning terms the pre-application proposal would result in the loss of the site as a community facility – Appendix F of the Council's Development Management DPD defines police buildings as a community facility. The Council essentially seeks to protect the loss of community facilities whilst maintaining and improving community safety in the Borough. Further, Policy D11 of the London Plan seeks to maintain a safe and secure environment.

The developer will be required as part of any formal submission of a planning application to evidence relevant planning policy justification for the loss of the Police Station site from community use to residential use. Policy DM49 Managing the Provision and Quality of Community Infrastructure states that A) the Council will seek to protect existing social and community facilities unless a replacement facility is provided which meets the needs of the community. It goes on to state that B) where a development proposal may result in the loss of a facility, evidence will be required to show that: a) the facility is no longer required in its current use; b) the loss would not result in a shortfall in provision of that use; and c) the existing facility is not viable in its current use and there is no demand for any other suitable community use on site. Policy DM49 C) also requires evidence and marketing information demonstrating that the premises has been marketed for use as a community facility for a reasonable length of time (minimum 12 months) and that no suitable user has been/or is likely to be found.

Given that the proposed closure and disposal of Hornsey Police Station forms part of the Metropolitan Police Service's rationalisation and investment programme, Officers consider that policy DM49 A), B)) b) and part of c) are met subject to reassurances that the loss of the police station will not result in the overall reduction in public safety/policing services in the locality and the Borough more generally. Further evidence is required to demonstrate that parts c) and C) of the policy are also met i.e. there is no demand for any other suitable community use on site, supported by marketing information.

Design, Appearance and Heritage Impact

Hornsey Police Station is a three-storey building, constructed in 1915, designed in a Baroque style by John Dixon Butler, architect to the Metropolitan Police. It is built in bright-red brick with terracotta banding and window surrounds, six-over-six pane sash windows and a bold pedimented entrance inscribed 'POLICE'. It replaced an earlier police station of c1868 and originally formed part of a fine group of civic buildings including a public library, demolished in the 1960s after

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the library was relocated to Crouch End, and a fire station, also demolished. Hornsey Police Station is located within the Hillfield Conservation Area. The most recent appraisal identified the building, together with its tall red brick boundary walls, as making a positive contribution to the character and appearance of this part of the conservation area. The retention of the historic police station building (known as block A) is therefore supported.

Officers consider that taking into consideration the historic development of the site and the existing townscape, the site can accommodate additional development. Officers consider that the height, massing and scale of the proposed 'new build' part of the development to be acceptable within the site's context and existing built form of surrounding buildings.

The contemporary reinterpretation of the Police Station (Block C – which is the 'new build' part of the scheme) is promising subject to further refinements such as adding more interest to the corner gable and upper floor balconies. From a design point of view, the architectural concept of the 'weaved chequered board pattern' works well within its context.

In terms of Block B (also part of the 'new build' part of the scheme), the retention of the gap between the proposed development and the police station building maintains a clear separation between the historic building and the proposed contemporary development. The proposed brickwork for this block matches the brickwork of the Police Station, retaining some connection with the historic building while the contemporary design of the proposed block creates a contrast and distinct separation between old and new. The rhythm of the windows reflects the pattern of fenestration of the former Police Station and adds interest to the proposed block. From a Conservation point of view, although block B is considered a fine piece of architecture, the conservation officer has a concern that the building may appear alien in its surroundings. The design of the mews houses of block B towards the rear of Tottenham Lane would appear subservient in terms of height and scale.

The central communal landscaped garden has progressed. A good quality landscaped plan is fundamental to the success of the scheme. Public realm improvements are also proposed.

Residential Unit Mix and Affordable Housing

The proposal would provide 6 x 1 bed flats, 11 x 2 bed flats, 2 x 3 bed flats, 6 x 3 bed houses and 4 x 4 bed houses of which include 3 wheelchair accessible units. This range of unit sizes is considered appropriate in this location and optimises the use of the site to meet housing need particularly the need for family sized accommodation.

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The scheme proposes 7 Affordable Housing Units of which 5 can be rented (London Affordable Rent) and 2 intermediate (Shared Ownership) this equates to 24% affordable units. The affordable units would be located in block C

The developer's viability report will be submitted as part of any formal planning application and thereafter independently assessed to ensure that the proposal provides the maximum amount of affordable housing that can viably be delivered as part of the proposed scheme.

Transportation and Parking

This site has a public transport accessibility level (PTAL) of 4, which is considered 'good' access to public transport services. Several bus services are accessible within 3 to 5 minutes' walk of the site, and Hornsey Railway Station is a 5 minutes walk from the site.

The site is also located within the Hornsey South CPZ, which has operating hours of 11.00 to 13.00 Monday to Friday.

The proposed scheme would be a car free development. With a public transport accessibility level of 4 the pre-application scheme does meet the criteria of Policy DM32 of the Development Management DPD for formal designation as a car free/permit free development. Cycle parking stores will be located in each block. The cycle parking to be provided will need to meet London Plan standards for residential in terms of absolute numbers. Any future planning application will require full details of cycle parking which will be scrutinised by officers to confirm it will be achievable within the development footprint. Three blue badge spaces for the accessible units would be provided which is policy compliant (10% of the overall number of residential units).

Discussions are ongoing with the Council's Transport Planning team who require a parking stress survey to be carried out for the existing arrangements to provide details on the existing parking conditions and provision. In addition to this the developer will likely be required to provide mitigation measures to reduce potential parking impacts and promote the use of sustainable and active modes of travel.

Impact on residential amenity

The windows of the proposed mews houses (Block B) towards the rear of Tottenham Lane would need to be designed to ensure they mitigate potential overlooking and loss of privacy issues to the rear garden and windows of the surrounding properties, in particular the neighbours on Glebe Road and Tottenham Lane.

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Further assessment will be required in relation to existing and newly published BRE guidelines in relation to daylight / sunlight requirements so as to ensure that the amenity of neighbouring residents is not materially affected.

Other matters

Consideration on the following matters is also required – but has not yet been discussed in detail:

- Flooding and drainage (the site is in a critical drainage area);
- Energy strategy;

Appendix 7 - Financial Viability Assessment (FVA)



Our ref: DB/J043226

Valerie Okeiyi
Principal Planning Officer
Haringey Council
5th Floor Alexandra House,
Wood Green,
London
N22 7TR

16 June 2023

Dear Valerie

Former Hornsey Police Station, 98 Tottenham Lane, London, N8 7EJ

Further to our recent correspondence, we provide a summary of the negotiations which have been concluded with the applicant.

GL Hearn were instructed by LB Haringey to undertake a due diligence review of a Financial Viability Assessment (FVA) submitted in support of planning application HGY/2022/2116 submitted for a residential development at Former Police Station, 98 Tottenham Lane, Hornsey, London, N8 7EJ.

The proposal is for the following description of development:

"Retention of existing Police Station building (Block A) with internal refurbishment, rear extensions and loft conversions to create 6 terrace houses and 4 flats. Erection of two buildings comprising of Block C along Glebe Road and Harold Road to create 8 flats and erection of Block B along Tottenham Lane and towards the rear of Tottenham Lane to create 7 flats and 4 mews houses including landscaping and other associated works"

The following table summarises the key inputs and assumptions adopted within the proposed scheme to formulate the initial Residual Land Value for the March 2023 Financial Viability Review:

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GL Hearn Limited
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London, EC2M 4YE

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glhearn.com

March 2023 Assumptions

Input	GLH Assumptions	Andrew Golland Assumptions
Residential Floor Area NSA (sq ft)	28,544	24,348
Construction Cost	£7.583m	£7.813m
Contingency	@5% inc. in build costs	@5% inc. in build costs
Finance Rate	6.75%	6.75%
Planning Obligations	£881,017	£881,017
Professional Fees	8% on Construction Costs	12% on Construction Costs
Residential Disposal Costs	£3.0% of GDV	£3.0% of GDV
Gross Development Value	£21.640m	£19.297m
Residual Land Value	£8.773m	£3.847m
Developer's Profit	17.5% on GDV	20% on GDV
Timescale		
Pre-Construction	3 Months	n/a
Construction	14 Months	n/a
Sale	6 Months	n/a

GL Hearn has subsequently had discussions with Andrew Golland Associates and Blackacre and have accepted the following inputs and assumptions:

Input	Agreed Upon Assumptions
Residential Floor Area NSA (sq ft)	28,544
Construction Cost	£7.703m
Contingency	@5% inc. in build costs
Finance Rate	7.50%
Planning Obligations	£888,617
Professional Fees	10% on Construction Costs
Residential Disposal Costs	£3.0% of GDV
Gross Development Value	£21.365m
Residual Land Value	£3.991m
Developer's Profit	17.5% on GDV
Pre-Construction	6 Months
Construction	18 Months
Sale	6 Months
Pre-Sale %	30%

In the initial proposal there was no mention of a proposed tenure split of the affordable housing, however the applicant has now proposed 8 units of London Affordable Rent following discussions. This is not in line with the boroughs policy of 60% Social Rent/Affordable Rent and 40% intermediate housing.

The proposed scheme has been appraised based on the above inputs, and has further been tested against a range of construction costs and residential sales, resulting in the following range of RLV:

Proposed Scheme Sensitivity Analysis						
Construction Gross Cost						
		-5%	-2.5%	0%	+2.5%	+5%
Residential Gross Sales	-5%	£3.752m	£3.571m	£3.390m	£3.208m	£3.027m
	-2.5%	£4.053m	£3.871m	£3.690m	£3.509m	£3.327m
	0%	£4.353m	£4.172m	£3.991m	£3.809m	£3.628m
	2.5%	£4.654m	£4.473m	£4.291m	£4.110m	£3.928m
	5%	£4.955m	£4.773m	£4.592m	£4.410m	£4.229m

When compared to the Benchmark Land Value of the site which is £3.993m it is clear there is capacity for the scheme to provide additional affordable housing without impacting the viability of the site.

Viability Conclusions			
GL Hearn proposed Scheme RLV	BLV	Surplus / Deficit	Exceeds BLV Y / N
£3.991m	£3.993m	-£0.002m	N

The scheme as proposed (8 LAR units) both meets, and is capable of, supporting contributions towards the LPA's affordable housing provision. However the provision of an all London Affordable Rented scheme, is deemed acceptable in this instance for affordability and saleability on to an affordable housing provider reasons.

The Residual Land Value of the scheme has been assessed against the Existing Use Value (EUV) of the police station which was concluded to be £275psf. A 20% premium was considered to be reasonable to incentivise the landowner to sell the land and therefore the Benchmark Land Value was concluded to be £3.993m.

We have therefore concluded that the development is unable to provide additional affordable housing than proposed (8 LAR units) or a payment in lieu of on site provision.

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Planning Sub Committee

REPORT FOR CONSIDERATION AT PLANNING SUB-COMMITTEE

1. APPLICATION DETAILS

Reference No: HGY/2022/0563

Ward: Northumberland Park

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

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

Applicant: Goods Yard Tottenham Limited.

Ownership: Private

Plans and Document: See **Appendix 1** to this report.

- 1.1 The application has been referred to the Planning Sub-committee for decision as the planning application is a major application that is also subject to a s106 agreement.
- 1.2 The planning application has been referred to the Mayor of London as it meets Categories 1A (1) ,1B(1c) and 1C(1c) as set out in the Town and Country Planning (Mayor of London) Order 2008.

SUMMARY OF KEY REASONS FOR RECOMMENDATION

- The proposal follows the approval at appeal of a development of a very similar scale and design
- The proposal is a well-designed, residential-led mixed-use scheme providing a range of residential accommodation and 2,068sqm (GEA)) of commercial space, including at least 400sqm of business space (Use Class E(g) (i)(ii)(iii)).

- The proposed scheme safeguards industrial uses on the Peacock Industrial Estate
- The proposed scheme allows for an incremental delivery of comprehensive proposals for site allocation NT5, in accordance with Policy NT5 requirements and guidelines and the adopted High Road West Masterplan Framework.
- The scheme would deliver a mix of dwelling sizes, including family sized homes and including 97 Low Cost Rented homes and 181 Shared Ownership homes, representing a 33% provision of affordable housing by unit number and 36% provision by habitable room.
- 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 architectural quality of the proposed tall buildings is of sufficiently high quality to justify their proposed height and form and their likely effects on the surrounding area.
- The proposal secures the future of the Listed Buildings at Nos. 867-869 High Road and the locally listed Station Master's House and improves their immediate setting. 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.

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 informatives 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 the section 106 legal agreement referred to in resolution (2.1) above is to be completed no later than 11th September 2023 or within such extended time as the Head of Development Management or the Assistant Director shall in her/his sole discretion allow.
- 2.3 That, following completion of the agreement(s) referred to in resolution (2.1) within the time period provided for in resolution (2.2) above, planning permission is granted in accordance with the Planning Application subject to the attachment of the conditions.

- 2.4 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 Summary – (the full text of recommended conditions is contained in **Appendix 11** of this report).

- 1) Time Limit – 5 years
- 2) Approved Plans and Documents
- 3) Phases – approval of Phasing Plan (PRE-COMMENCEMENT)
- 4) Minimum amount of Business Floorspace - At least 400sqm of Business floorspace (Use Class E(g) (i) (ii) or (iii).
- 5) Accessible Housing – ‘Wheelchair user dwellings’ and ‘Accessible and adaptable dwellings’
- 6) Commercial Units - Ventilation/Extraction
- 7) Commercial Units - Café/restaurant Opening Hours - 07.00 to 23.00 (Monday to Saturday) and 08.00 to 23.00 (Sundays and Public Holidays).
- 8) Commercial Units – BREEAM ‘Very Good’(PRE-COMMENCEMENT)
- 9) Commercial Units – Noise Attenuation
- 10) Noise Attenuation - Dwellings
- 11) Depot Block G – Wind Mitigation
- 12) Detailed Fire Statement – development to be carried out in accordance with.
- 13) Landscape Details
- 14) Trees & Planting – 5-year Replacement
- 15) Temporary Landscaping/Use (Depot part of site)
- 16) Tree Protection Measures (PRE-COMMENCEMENT)
- 17) Biodiversity enhancement measures
- 18) External Materials and Details
- 19) Living roofs
- 20) Ground Floor Rear Boundary Details – Depot Block D
- 21) Energy Strategy
- 22) Overheating (Non-residential)
- 23) Future overheating (Dwellings)
- 24) Circular Economy
- 25) Whole Life Carbon
- 26) Energy Monitoring
- 27) PV Arrays
- 28) Brook House Yard Management Plan
- 29) Secured by Design

- 30) Stage I Written Scheme of Investigation of Archaeology (PRE-COMMENCEMENT)
- 31) Stage II Written Scheme of Investigation of Archaeology
- 32) Foundation Design – Archaeology (PRE-COMMENCEMENT)
- 33) Water Supply Infrastructure (PRE-COMMENCEMENT)
- 34) Land Contamination – Part 1 (PRE-COMMENCEMENT)
- 35) Land Contamination – Part 2
- 36) Unexpected Contamination
- 37) Basement Vehicular Access Control Arrangements
- 38) Road Safety Audit – White Hart Lane (PRE-COMMENCEMENT)
- 39) Road Safety Audit – Embankment Lane (PRE-COMMENCEMENT)
- 40) Car Parking Design & Management Plan
- 41) Cycle Parking Details (PRE-COMMENCEMENT)
- 42) Delivery and Servicing Plan
- 43) Detailed Construction Logistics Plan (PRE-COMMENCEMENT)
- 44) Public Highway Condition (PRE-COMMENCEMENT)
- 45) Railway Infrastructure Protection Plan
- 46) Demolition/Construction Environmental Management Plans (PRE-COMMENCEMENT)
- 47) Management and Control of Dust (PRE-COMMENCEMENT)
- 3 Business and Community Liaison Construction Group (PRE-COMMENCEMENT)
- 50) Telecommunications
- 51) Façade treatment
- 52) Brook House Yard boundary treatment
- 53) District energy network

Informatives Summary – (the full text of Informatives is contained in **Appendix 11** to this report).

- 1) Working with the applicant
- 2) Working with the applicant.
- 3) Community Infrastructure Levy.
- 4) Hours of Construction Work.
- 5) Party Wall Act.
- 6) Numbering New Development.
- 7) Asbestos Survey prior to demolition.
- 8) Dust.
- 9) Written Scheme of Investigation – Suitably Qualified Person.
- 10) Deemed Discharge Precluded.
- 11) Composition of Written Scheme of Investigation.

- 12) Disposal of Commercial Waste.
- 13) Piling Method Statement Contact Details.
- 14) Minimum Water Pressure.
- 15) Paid Garden Waste Collection Services.
- 16) Sprinkler Installation.
- 17) Designing out Crime Officer Services.
- 18) Land Ownership.
- 19) Network Rail Asset Protection.
- 20) Site Preparation Works.
- 21) Listed Building Consent – (Nos. 867-869 High Road)
- 22) s106 Agreement and s278 Agreement.

Section 106 Heads of Terms:

Implementation & Business relocation

- 1) **Partial implementation** – preventing inappropriate ‘mixing and matching’ of the extant Depot scheme and the proposed scheme.
- 2) **Business Relocation Strategy** – to assist existing business on the Carbery Enterprise Park re-locate within the development or, failing that, within the borough.

Affordable Housing

3) **Affordable Housing:**

- Minimum of 35.9% by habitable room
- Minimum of 40% by habitable room if sufficient grant available.
- Tenure mix – 60% Intermediate (Shared Ownership) housing & 40% Low Cost Rent housing by habitable room.
- LB Haringey to be offered first right to purchase up to 77 of the Low Cost Rented homes at an agreed price per square foot (Index Linked)
- Low Cost Rent homes to be London Affordable Rent – or where LB Haringey purchases Low Cost Rent homes, the first 61 at Social Rent and any additional homes at London Affordable Rent
- Quality standards & triggers for provision (no more than 25% of Market Units occupied until 50% of Affordable Units delivered, no more than 50% of Market until 100% of Affordable Units delivered)
- Location of different tenures (by Block).

- Affordable housing residents to have access to the same communal amenity and play space as Market housing (where Blocks have a mix of tenures).

4) Affordability:

- Weekly London Affordable Rent levels to be in accordance with the Mayor of London's Affordable Homes Programme (2016-2023) as follows (all Index Linked): 1-bed - £161.71, 2-bed - £171.20, 3-bed - £180.72 and 4-bed - £190.23).
- Intermediate homes to be Shared Ownership – sold at the minimum 25% share of equity and rental on the unsold equity up to 2.75%.
- Approve plan for marketing Shared Ownership homes to households living or working in:
 - Haringey - with max. annual income of £40,000 (Index Linked) for 1 & 2-bed homes and £60,000 for 3-bed homes – for 3-months prior to and 3-months post completion of each Phase.
 - London – with max. annual income of £90,000 (Index Linked) not until after 6 months of completion of each Phase.
 - Provided that annual housing costs for each home do not exceed 28% of the above relevant annual gross income levels.

5) Viability Review Mechanism:

- Early Stage Review (if not implemented within 24-months).
- Break Review (if construction suspended for 30-months or more).

Open Space Management

- 6) Publicly Accessible Open Space Access & Management Plan** – ensuring public access and future management & maintenance (in accordance with the Public London Charter) (October 2021).

- 7) **Future Use of 'Pickford Yard Gardens' Amenity Space** – use by residents of proposed buildings immediately to the south, in the wider NT5 Site Allocation (subject to use of reasonable endeavours).

Transportation

- 8) **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.

9) **Car-Capping:**

- Prohibiting residents (other than Blue Badge holders) from obtaining a permit to park in the CPZ
- £4,000 for revising the associated Traffic Management Order.

- 10) **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 £20,000 towards consultation/implementation of a CPZ.

11) **Residential & Commercial Travel Plans:**

- Appointment of a Travel Plan Coordinator (to also be responsible for monitoring Delivery Servicing Plan).
- Provision of welcome induction packs containing public transport and cycling/walking information, map and timetables to every new household.
- £3,000 for monitoring of Travel Plan initiatives.

12) **Car Club:**

- Establishment or operation of a Car Club Scheme.
- Minimum of 4 x Car Club spaces (with actual number tbc following discussions with prospective operators).
- 2 years' free membership for all households and £50 per year credit for the first 2 years.

Employment & Training

13) **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.

Carbon Management & Sustainability

14) Future connection to District Energy Network:

- Submission of Energy Plan for approval by LPA
- Connect the whole development (including Station Master's House and Listed Buildings at Nos. 867-869 High Road) to a site-wide energy centre.
- Ensure the scheme is designed to take heat supply from the proposed DEN (including submission of DEN Feasibility Study)
- Design of secondary and (on-site) primary DHN in accordance with LBH Generic Specification and approval of details at design, construction and commissioning stages.
- Use all reasonable endeavours to negotiate a supply and connection agreement with the proposed DEN within a 10-year window from the date of a permission.
- Collaborate with the LPA to deliver a future connection point from the site to the south to allow for the onward development of an energy network

15) Carbon offsetting:

- Payment of an agreed carbon offset amount (residential & non-residential) plus 10% management fee on commencement;

Telecommunications

16) Ultrafast broadband infrastructure and connections to be provided.

Construction

17) Commitment to Considerate Constructors Scheme.

Monitoring

18) Monitoring costs – based on 5% of the financial contribution total & £500 per non-financial contribution.

Section 278 Highways Agreement Heads of Terms:

1) Works to tie in with the High Road and White Hart Lane.

3.1 In the event that members choose to make a resolution contrary to officers' recommendation, members will need to state their reasons.

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

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- i. In the absence of a legal agreement preventing the partial implementation of the Goods Yard extant consent (HGY/2018/0187) or the partial implementation of the Depot extant consent (HGY/2019/2929), the partial implementation of the proposed scheme and either of these extant schemes could result in an unacceptable form of development, contrary to good planning and Tottenham Area Action Plan Policies AAP1 and NT5.
 - ii. In the absence of a legal agreement securing the implementation of an approved Business Relocation Strategy, the proposed scheme would result in the unacceptable loss of industrial land, contrary to London Plan Policy E4, Strategic Policies SP8 and SP9 and DMD Policy DM40.
 - iii. In the absence of a legal agreement securing (1) the proposed provision of on-site affordable housing; (2) Early Stage and Development Break Viability Reviews; (3) and the first right of the Council to purchase up to 61 of the proposed Low Cost Rent homes, the proposed scheme would fail to foster a mixed and balanced neighbourhood where people choose to live, and which meet the housing aspirations of Haringey's residents or assist in estate regeneration. As such, the proposals would be contrary to London Plan Policies H4 and H8, Strategic Policy SP2, and DM DPD Policies DM 11 and DM 13, Policy TH12 and Policy NT5.
 - iv. In the absence of the legal agreement securing an Open Space Management and Access Plan and obligations relating to the future use of and access to the proposed Pickford Yard Gardens, the proposed scheme would fail to secure well-maintained open space and fail to safeguard the comprehensive development of Site Allocation NT5. As such, the proposals would be contrary to Strategic Policy SP12, Tottenham Area Action Plan Policies AAP1, AAP11 and NT5 and DM DPD Policy DM20.
 - v. In the absence of a legal agreement securing financial contributions towards social infrastructure provision (community space, library and publicly accessible open space), the proposed scheme would (1) fail to meet the requirements for a Fast Track application as set out in London

Plan Policy H5 and would require a Financial Viability Appraisal to justify the proposed amount and type of affordable housing; and (2) fail to make a proportionate contribution towards the costs of providing the infrastructure needed to support the comprehensive development of Site Allocation NT5. As such, the proposals are contrary to London Plan Policy DF1, Strategic Policies SP16 and SP17, Tottenham Area Action Plan Policies AAP1, AAP11 and NT5 and DM DPD Policy DM48.

- vi. In the absence of a legal agreement securing the public benefits of the scheme (including affordable housing, potential contribution to Love Lane Estate regeneration, financial contributions towards social infrastructure provision, reduction to carbon dioxide emissions and local employment and training), the proposed scheme would lead to 'less than substantial harm' to heritage assets that would not be outweighed by public benefits, contrary to NPPF paragraph 196, London Plan Policy HC1, Strategic Policy SP12, Policy AAP5, AAP Site Allocation NT5 and DPD Policy DM9.
- vii. In the absence of a legal agreement securing (1) a Future Connectivity & Access Plan; (2) Car Capped Agreement and financial contributions to amend the relevant Traffic Management Order (TMO) to change existing on-street car parking control measures; (3) a financial contribution towards a survey, consultation and potential implementation of an Enfield CPZ; (4) Travel Plans and financial contributions toward travel plan monitoring; and (5) Car Club provision, the proposals would have an unacceptable impact on the safe operation of the highway network, give rise to overspill parking impacts and unsustainable modes of travel. As such, the proposal would be contrary to London Plan Policies T1, T2, T6, T6.1 and T7, Spatial Policy SP7, Tottenham Area Action Plan Policy NT5 and DM DPD Policy DM31.
- viii. In the absence of a legal agreement securing the implementation of (1) any necessary temporary heating solutions; (2) an energy strategy, including connection to a DEN; and (3) carbon offset payments, the proposals would fail to mitigate the impacts of climate change. As such, the proposal would be unsustainable and contrary to London Plan Policies SI2 and SI3 and Strategic Policy SP4, and DM DPD Policies DM 21, DM22 and SA48.
- ix. In the absence of a legal agreement securing an Employment and Skills Plan the proposals would fail to ensure that Haringey residents benefit from growth and regeneration. As such, the proposal would be contrary to London Plan Policy E11 and DMD Policy DM40.
- x. In the absence of a legal agreement requiring broadband connectivity designed into the development, the proposed scheme would fail to provide

sufficient digital connectivity for future residents and businesses, contrary to London Plan Policy SI6 and DMD Policy DM54.

- 3.3 In the event that the Planning Application is refused for the reasons set out above, the Head of Development Management or the Assistant Director (in consultation with the Chair of Planning sub-committee) is hereby authorised to approve any further application for planning permission which duplicates the Planning Application provided that:
- i. There has not been any material change in circumstances in the relevant planning considerations, and
 - ii. The further application for planning permission is submitted to and approved by the Assistant Director within a period of not more than 12 months from the date of the said refusal, and
 - iii. The relevant parties shall have previously entered into the agreement contemplated in resolution 2.1 above to secure the obligations specified therein.

CONTENTS

- 3.0 PROPOSED DEVELOPMENT AND SITE LOCATION DETAILS
- 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 (23 August 2021)
- Appendix 5: Planning Sub-Committee Minutes 24 May 2021
- Appendix 6: Development Management Forum 25 May 2021
- Appendix 7: Quality Review Panel Report 15 December 2020
- Appendix 8: Quality Review Panel Report 18 May 2021
- Appendix 9: Quality Review Panel Report 08 September 2021
- Appendix 10: Plans and Documents List
- Appendix 11: Conditions
- Appendix 12: Appeal Decision
- Appendix 13: Appeal Design Comments

3. PROPOSED DEVELOPMENT AND LOCATION DETAILS

Background and Previous Appeal Decision

- 3.1. A previous application (HGY/2021/1771) was refused on the grounds that the proposed tall buildings (Goods Yard Blocks A and B and Depot Block B (by virtue of the their scale and proximity to each other and the existing Rivers Apartments tall building would have adverse impacts on long and mid range views in the locality and harm heritage assets and insufficient provision of publicly accessible open space.
- 3.2. Following an appeal public inquiry, the Appeal Inspector concluded that the proposed tall buildings would cause a low level of harm to the character and appearance of the area and a low level of less than substantial harm to the North Tottenham Conservation Area, The Grange, 797-799 High Road and 819-821 High Road but found very substantial public benefits clearly outweighed the harm. The benefits included housing provision, contribution to regeneration, economic benefits and biodiversity enhancements. In respect to open space, the Inspector concluded that the proposed provision would be a significant shortfall against the Policy DM20 requirement, but in accordance with the open space requirements set out in Policy NT5 and the High Road West Masterplan Framework and made appropriate provision for publicly accessible open space. Overall, the Inspector found a conflict with the adopted development plan, when read as a whole, but concluded the harms associated with the development do not outweigh the benefits.
- 3.3. The proposed development is similar in scale and layout to the appeal scheme and therefore is a material consideration that must be given significant weight. This application was initially submitted in an effort to address the reasons for refusal but was not progressed to a decision at that time. Following the appeal decision, fire regulations and guidance changed which meant that the scheme, as originally submitted, would not be able to comply with requirements relating to fire safety. In line with latest fire safety regulations and guidance and in consultation with the Health and Safety Executive (HSE) amendments were made to the scheme which includes alterations (mostly internal) to provide additional lifts, secondary stair cores necessitating corresponding changes to internal layouts. This has resulted in some increases in the scale of the development since submitted. Compared the appeal proposal there is a 1 storey increase to the 'shoulder' of the southern tower but no changes to the height of width of the towers so the proposal is broadly the same scale.
- 3.4. The key changes since the approved appeal are:
 - A reduction in the number of residential units, from 867 to 844

- An increase in the proportion of family housing within the housing mix from 17% to 20%
- Inclusion of an additional shoulder storey to the Goods Yard south tower
- Moving The Depot tower further away from Rivers Apartments to its north by 1m.
- Reconfiguration and enlargement of basement to accommodate additional lift and stair core requirements. All parking is now provided at basement level.
- Amendments to the facades including use of a slightly lighter tone of materials notably to the core of towers
- Minor changes to landscaping to align with the above

3.5. The affordable housing provision and provision of homes at Council rents remains the same as approved despite the decrease in overall unit number. The proposal contributes approximately £250,00 more in infrastructure provision through the increase in CIL rates since the previous decision. The development plan has not changed materially since the appeal decision so the policy position remains the same as at the time of the appeal decision.

Proposed Scheme

Layout & Access

- 3.6. The proposed scheme locates a north-south street (Embankment Lane) parallel to the eastern boundary (the shared boundary with the Peacock Estate). This boundary would form the interface between the application site and the wider High Road West Development Area. The street will be a no through road for vehicular traffic. The western edge of the site being occupied by the proposed 'Goods Yard Walk/ Ecology Walk' amenity space for residents living in proposed Goods Yard Blocks A to F. The proposed east-west street (Pickford Lane) runs perpendicular to High Road and Embankment Lane, adjacent to blocks A-G and connects Cannon Road to High Road, across The Depot part of the site. Pedestrian and cycle permeability is retained through shared footway/cycle way between Goods Yard Block A and Depot Block B. The proposed location of the blocks is similar to the previously consented Goods Yard and Depot Schemes, including the relationship of blocks D and E next to existing buildings on the southern side of Cannon Road.



- 3.7. There would be four open spaces along the proposed north-south route on the Goods Yard. This includes a pocket park adjacent to GY Block A (approx. 7m x 11m). A pocket park and trim trail adjacent to blocks GY A – E (approx. 4m x 74m) and a pocket park to the south of GY Block G (approx. 14m x 14m). A larger park (Peacock Park) (approx. 33m x 37m) is proposed to the southern boundary of the Depot part of the site, between blocks B and G. These would be connected by a network of streets of between 12m and 14m wide, designed to prioritise walking and cycling, that would include linear rain gardens and limited in parallel and perpendicular car parking spaces. A communal green amenity space 'Goods Yard Walk' would run along the western railway edge of the Goods Yard part of the site.
- 3.8. Vehicular, cycle and pedestrian access points for the site would be in the south from White Hart Lane (in a similar location to the existing Goods Yard access) and in the north from the existing four-arm signal-controlled junction with the High Road and Brantwood Road. The southern access would comprise a 5.5m wide carriageway with footways a minimum of 2 metre width either side. This would reduce to 3.7m wide from proposed Depot Block B northwards to Goods Yard Block A (to cater just for refuse collection, loading/unloading and emergency access) and just emergency access north of proposed Block A).
- 3.9. The northern access from the High Road would also comprise a 5.5m carriageway, narrowing to 4.4m wide between proposed Block D and Peacock Park, before widening back to 5.5m again between proposed Blocks A, B, C and D and connecting with Cannon Road. There would be no carriageway connection between the Depot and the Goods Yard parts of the site. This is to

Buildings and uses

- 3.10. The proposed scheme includes the change of use of a retained and refurbished Station Master's House (No. 52 White Hart Lane) from residential (its last lawful use) to Use Class E and Nos. 867-869 High Road from office use to 6 x 2-bed residential flats. The latter is the same as was granted planning permission and Listed Building Consent in September 2020 (HGY/2019/21929 and HGY/2019/2930) and the proposed conversion would rely on this extant Listed Building Consent.
- 3.11. The proposed new-build development comprises 15 Blocks, some of which would be interlinked. The ground floor of the Blocks would comprise residential, commercial and ancillary uses (including entrance lobbies, circulation space, waste storage, cycle storage, plant, post rooms and parking/ parking area access). Commercial floorspace would be located on the ground floor within The Goods Yard Blocks E, F, G and H, the Station Master's House and The Depot Blocks ABC and G. The Goods Yard Blocks A to F and The Depot Blocks A and C would include a single-level basement for plant and car and cycle parking uses. Table 01 summarises the proposed land uses and parking provision.

Table 01: Proposed land uses and parking provision.

Total floorspace	95,069sqm (GIA)	
Residential	Goods Yard 143 x 1-bed 235 x 2-bed 108 x 3-bed 7 x 4-bed	The Depot 100 x 1-bed 191 x 2-bed 57 x 3-bed 3 x 4-bed
	844 homes 78,737sqm (GIA)	
Commercial (Use Class E)	2,040sqm (GIA)	
Ancillary & parking	13,756sqm (GIA)	
Open Space	25,195sqm, of which 15,650sqm is open space/amenity space/public realm and play space and 9,545sqm is private balcony/terrace space and 2,900 sqm is play space.	
Car parking	155 Spaces including 89 accessible spaces, 4 car club spaces and 2 visitor spaces.	
Cycle parking	1,671 long-stay residential spaces, 15 long-stay commercial spaces and 78 short-stay visitor	

- 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 1,795.5 people (including approx. 305 children). This is an estimated 488

additional people (113 more children) than the consented schemes (HGY/2018/0187 & HGY/2021/3175) but a similar quantum to permission HGY/2021/1771. Chapter 6 of the ES states that the applicant expects the proposed scheme to be delivered over a five-year construction period starting in 2023 as set out in Table 02 below. The expected on-site population would increase incrementally over this period.

3.13.

Table 02: Proposed phasing

	2023	2024	2025	2026	2027	2028
Phase 1A: Goods Yard Blocks C, D, E, F, G & H						
Phase 1B: Goods Yard Block B						
Phase 2: Goods Yard Block A						
Phase 3A: The Depot Blocks D, E, F & G						
Phase 3B: The Depot Block ABC						

Building heights

3.14. Table 03 below summarises the proposed heights of the proposed buildings, both in terms of storeys above ground and metres Above Ordnance Datum (AOD).

Table 03: Proposed building heights.

Block	Storey height	Metres AOD height	Basement	
Goods Yard				
A	32	97.33 to 114.23	Single level	
B	27	79.33 to 98.03		
C	6	34.33		
D	6	34.33		
E	7	37.63		
F	7	28.33 to 36.43		
G	5	32.72 to 39.64	None	
H	3	24.23		
Station Master's House	2	21.40		
The Depot				

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A	29	84.60 to 104.00	Single level	
B	9	42.60		
C	5	32.50		
D	6	32.70	None	
E	6	26.70 to 32.60		
F (Nos. 867 & 869 High Road	3	23.91 to 25.21		
G	6	24.71 to 35.19		

Nature of application and Environmental Impact Assessment

- 3.15. This is a “full” planning application for the retention and conversion of the two Listed Buildings at 867 and 869 High Road and the locally listed Station Masters House (53 White Hart Lane) and the redevelopment of the rest of the site. Please note, Listed Building Consent has already been granted for internal and external works to Nos. 867 and 869 High Road associated with their proposed conversion.
- 3.16. The proposed development falls within the scope of Paragraph 10B 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.
- 3.17. The scope of the ES and associated addendum reports (wherein the ES) on an assessment of the potential cumulative effects of the following consented and proposed schemes: No. 807 High Road, the Printworks (Nos. 819-829 High Road), the Northumberland Terrace ‘cultural quarter’, the Northumberland Development Project and the Lendlease High Road West Scheme. The ES also discusses in a number of technical chapters the proposed development in the wider context of the High Road West Masterplan Framework. The findings of the ES are discussed in the body of this report as necessary and any adverse environmental effects have been identified.

The Site and Surroundings

- 3.18. The application site is ‘r’ in shape, comprising the Goods Yard running north-

south and The Depot running east-west. It measures approx. 2.5 hectares.

Depot part of the site

- 3.19. The Depot part of the site is roughly rectangular in shape (approx. 166m wide and 69-75m deep). It has a level of 13.44m AOD in the south, rising to 24.22m near the centre and decreasing to approx. 13.36m along the northern boundary.
- 3.20. The site accommodates Nos. 867 and 869 High Road (Grade II Listed Buildings), a large retail store, currently occupied by B&M Home Store, five small retail units and a surface level car park. The High Road frontage, including Nos. 867 and 869, are within the North Tottenham Conservation Area.

- 3.21. 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.

Goods Yard part of site

- 3.22. The Goods Yard is roughly triangular in shape (80m wide at its widest point narrowing to approx. 20m in the north). The topography here steadily increases in height from White Hart Lane to the north from approx. 12.22m Above Ordnance Datum (AOD) to 14.76m AOD.
- 3.23. The Goods Yard comprises mainly of a hardstanding area formed following its temporary use as a construction compound for stadium development. It is currently used temporarily for car parking to support the safe return of fans to live games under restricted capacities. The site also includes the Carbery Enterprise Park in the south east corner (2 x 2-storey buildings of 11 industrial units) and the locally listed Station Master's House at No. 52 White Hart Lane (built to serve White Hart Lane rail station, the two-storey detached house is currently vacant). The White Hart Lane frontage is within the North Tottenham Conservation Area.
- 3.24. There are a number of low-quality sycamore and birch trees on site, together with a number of similar trees to the west of the site on the railway embankment.

Existing Land Uses

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

Table 04: Existing uses

Use (Use Class)	Existing Floorspace (GIA)
Depot part of site	
B&M Home Store (E(a) retail) & 195 car parking spaces	4,557sqm
5 x small retail units (Use Class E(a) retail/other)	284sqm
Nos. 867-879 High Road – (Use Class F1(a) adult education)	673sqm
Goods Yard part of site	
Station Master's House - vacant housing (Use Class C3)	175sqm
Carbery Enterprise Park - 11 general industrial/light industrial/office units (Use Classes B2, E (g) (i) and(iii))	1,012sqm

Boundaries

- 3.26. The existing northern boundary comprises a brick wall of varying height from between approx. 2.1m to 5.4m in height. 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 southern cul-de-sac adjoins the application site northern boundary. A new vehicle/pedestrian/cycle connection is proposed between the two sites. 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 has received a planning application for an estate renewal scheme comprising approx. 1,992 homes and associated social infrastructure and open space.
- 3.28. Immediately to the south-east of the Depot part of the site is No. 865 High Road, a poor-quality pastiche three-storey residential building, with residential rooms in its rear return looking north over the site. To the east is the High Road which comprises a range of three to four-storey mixed use buildings, including housing on some upper floors. Further to the east are the residential streets based around Brentwood Road.
- 3.29. To the east of the Goods Yard and to the south of the Depot parts of the site is the Peacock Industrial Estate. The Industrial Estate comprises part one/part 2-storey industrial, warehouse and office buildings which turn their back on the application site and are accessed from White Hart Lane and the High Road. Nos. 32-34a White Hart Lane comprises Grade II Listed buildings occupied as The Grange community centre.
- 3.30. To the south of White Hart Lane is White Hart Lane Overground Station, which has recently been re-built and enlarged, and the Council -owned Love Lane Estate.
- 3.31. The western boundary of the site is formed by the Lea Valley railway lines. To the west of this is Pretoria Road, with mainly housing fronting the street and Durban Road which joins it from the west, and, in the London Borough of Enfield, the Commercial Road Industrial Estate.
- 3.32. The site is fairly close to Cycle Superhighway 1, which runs from Old Street to Tottenham Hotspur Stadium and is well served by bus services (Routes 149, 259, 279, 349 and N279) on the High Road). The site is between about 50 and 300m away from White Hart Lane Overground Station and the W3 bus route on

- 3.33. White Hart Lane. It is also within a walkable distance of Northumberland Park station to the south-east (approx. 1.2km), Silver Street station to the north (approx. 0.8km) and Meridian Water station to the east (approx. 1.4km). The site is within the Tottenham North Controlled Parking Zone (CPZ) and the Stadium Event Day CPZ.
- 3.34. Most of the Goods Yard part of the site has a PTAL rating of 4 ('Good'), with the White Hart Lane frontage benefitting from a PTAL of 5 ('Very Good'). The eastern part of the Depot part of the site has a PTAL of 4 and the western part has a PTAL of 3 ('Moderate'). The site's vehicular access forms one arm of a four-arm signal-controlled staggered junction with the High Road.

4.

Relevant Planning and Enforcement History

The site

- 4.1. Goods Yard – Temporary planning permission (HGY/2015/3002) 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.
- 4.2. Goods Yard - Hybrid planning permission (HGY/2018/0187), 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.
- 4.3. Depot – Hybrid planning permission (HGY/2019/2929) and Listed Building Consent (HGY/2019/2930) 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.
- 4.4. 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).
- 4.5. High Road West – Planning permission (HGY/2021/3175) was granted in August 2022 for outline planning permission for a residential mixed use development comprising residential, commercial leisure and sui generis uses alongside public open space with matters of layout, scale, appearance, landscaping and access reserved for subsequent approval along side a detailed component comprising demolition of existing buildings and creation of new residential floorspace and associated landscaping and parking.
- 4.6. Goods Yard and Depot – Planning Permission (HGY/2021/1771), granted on appeal, for the demolition of the existing buildings and structures and redevelopment of the site for residential led mixed use development comprising residential units, commercial uses, hard and

- 4.7. The application was refused by the planning committee on the ground that the proposed tall buildings (Goods Yard Blocks A and B and Depot Block B (by virtue of the their scale and proximity to each other and the existing Riverside Apartments tall building would have adverse impacts on long and mid range views in the locality and harm heritage assets and insufficient provision of publicly accessible open space.
- 4.8. Following an inquiry, the Appeal Inspector concluded that the proposed tall buildings would cause a low level of harm to the character and appearance of the area and a low level of less than substantial harm to the North Tottenham Conservation Area, The Grange, 797-799 High Road and 819-821 High Road but found very substantial public benefits clearly outweighed the harm. The benefits included housing provision, contribution to regeneration, economic benefits and biodiversity enhancements. In respect to open space, the Inspector concluded that the proposed provision would be a significant shortfall against the Policy DM20 requirement, but in accordance with the open space requirements set out in Policy NT5 and the High Road West Masterplan Framework and made appropriate provision for publicly accessible open space. Overall, the Inspector found a conflict with the adopted development plan, when read as a whole, but concluded the harms associated with the development do not outweigh the benefits.
- 4.9. The proposed development is similar in scale and layout to the appeal scheme and therefore is a material consideration that must be given significant weight.

The wider area

- 4.10. 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).

- 4.11. 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.
- 4.12. 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).
- 4.13. 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).
- 4.14. 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.
- 4.15. 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.
- 4.16. The scheme now presented for your consideration broadly follows the layout, scale, materials and landscaping of previously consented Depot Scheme (reference HGY/2019/2929), Goods Yard Scheme (HGY/2018/0187), Depot and Goods Yard Scheme (HGY/2021/1771) and Landlease scheme (reference HGY/2021/3175). Table 5 below provides a summary of the previously consented schemes on the site and how they compare to the proposed scheme.

Aspect of Development	Extant Depot scheme (HGY/2021/1771) Extant Goods Yard Scheme (HGY/2018/0187) Both of which are incorporated into the parameters of the Lendlease High Road West Scheme (HGY/2021/3175)	Good Yards and Depot Appeal Scheme (HGY/2021/1771)	Proposed scheme
Total Residential floorspace (inc basement)	11,180sqm (4,800sqm GY and 1,250 D)	77,758	78,737 (GY 46,117 and D 32,620) sqm
Residential Units	Up to 646 (316 GY and 330 D)	867	844 (GY 493 and D 351)
Of which are affordable housing	126 (based on illustrative schemes) (35% by habitable room rising to 40% subject to grant funding)	297 (35.9% by habitable room rising to 40% subject to grant funding)	292 (35.93% by habitable room rising to 40% subject to grant funding)
		one bed 238 (27%) two bed 482 (55.6%) three bed 136 (15.7%) four bed 11 (1.3%)	One bed 243 (39%) Two bed 426 (50.5%) Three bed 165 (19.5%) Four bed 10 (1%)
Non-residential (commercial/ amenity floorspace)	Up to 1,720sqm (1,450sqm GY and 270 sqm Depot)	1,870sqm	2,068 sqm
Open space	11,180sqm (4,800sqm GY/	15,650sqm	15,630sqm

	6,380 D)		
Play Space	Up to 2,610sqm 1,360sqm GY and 1,250sqm D)	2,900sqm	2,900sq m
Maximum Building Heights	GY 24 storeys D 29 Storeys	GY Block A 32 storey D Block A 29 storey	GY Block A 32 storey Depot Block A 29 Storeys

Amendments since the original submission

- 4.17. During the application process, fire regulations and guidance changed which meant that the scheme, as originally submitted, would not be able to comply with requirements relating to fire safety. In line with latest fire safety regulations and guidance and in consultation with the Health and Safety Executive (HSE) further amendments to the scheme were made which includes alterations (mostly internal) to provide additional lifts, secondary stair cores necessitating corresponding changes to internal layouts.
- 4.18. Externally, the alterations to the Goods Yard part of the site include an increased basement footprint, an additional storey to block A, modest increase to the envelope of block A (extending southwards) and new windows to the façade. The balcony sizes to block B have been altered and the building envelope has been extended southwards. Block F (1) has been reduced by a storey and basement parking access provided between blocks F1 and F2.. Alterations to the Depot part of the site include changes to balcony sizes on Block ABC with the envelope of Block A altered through the introduction of an angle to the north and an additional bank of window and minor changes to the entrance arrangements for block E. This has resulted in a circa 262sqm increase in net internal floorspace and a circa 194 square metre increase in commercial/amenity floorspace. Figures 2 & 3 below provide envelope and footprint comparison between the originally submitted scheme,

Figure 02: Envelope Outline comparison between submission scheme (blue dash), amended proposed scheme (solid blue) and appeal scheme (solid red) (HGY/2021/3175).



Figure 04: Outline comparison between submission scheme (blue dash), amended proposed scheme (solid blue) and appeal scheme (solid red) (HGY/2021/3175).

KEY

- Feb. 2022 Resubmission Scheme
-Envelope Outline
- May. 2023 Amended Resubmission Scheme
- Amended Envelope Outline
- Appeal Scheme
-Envelope Outline



FIGURE 36. Site Plan - Outline Comparison

4.19. Fall-back Position

- 4.20. A fall-back position relates to an alternative proposal that could be reasonably achieved, be that one which already has extant planning consent (although is not yet implemented) or one which is permitted development that could be undertaken without the need for express planning permission. The previous

Goods Yard and Depot extant consents expire on 27/06/2025 and 24/09/2025 respectively and, subject to satisfying pre-commencement planning conditions and obligations, could both be implemented. The Goods Yard and Depot appeal consent (HGY/2021/1771) expires on 24/10/2025, subject to satisfying pre-commencement planning conditions and obligations, could be implemented. Both constituent parts of the application site are owned by the applicant, with, it is understood, a leasehold interest in the B&M store (on the Depot part of the site) that runs to September 2023, and officers consider that there is a 'real prospect' that one or both of the extant schemes would be implemented and built-out.

4.21. Case law has determined that such a fall-back position is a material planning consideration. As such, the assessment of the application scheme in the Material Considerations section of this report considers, where appropriate, the merits of the application against development plan policies and other material considerations in the following ways:

- Firstly, by considering the application as a stand-alone application scheme; and
- Secondly, by considering the application against the fall-back position established by the extant consents – including likely additional benefits and dis-benefits/harm that would result from the application scheme over and above those associated with the two extant consents.

4.22. This application is in 'full', whereas some of the extant consents are outline and hybrid (partly in 'outline' and partly in 'full'). This makes direct comparison difficult. Where relevant, account has been taken of previously approved plans, documents, planning conditions and planning obligations.

4.23. **Partial implementation and mixing and matching**

4.24. Officers have some concern that it might be possible to partially implement the extant consented Depot scheme (HGY/2019/2929) alongside development on the Goods Yard part of the site or partially implement the extant Goods Yard scheme allowed on appeal (HGY/2018/0187) alongside development on the Depot part of the site. Such 'mixing and matching' could result in unacceptable separation distances between tall buildings (Block B on the Depot part of the site and Block A on the Goods Yard part of the site).

4.25. If permission were to be granted, it would be possible to use a s106 planning obligation to prevent this.

4.26. The Lendlease permission (HGY/2021/3175) incorporated parameters to accommodate permissions HGY/2019/2929 and HGY/2018/0187) on the applicable parts of the site. The appeal consent (HGY/2021/1771) and proposed scheme fall outside of the maximum parameters of Planning permission HGY/2021/3175. A mechanism has been incorporated into planning permission HGY/2021/3175 to enable parameters to be amended in response to consents subsequently granted by the Local Planning Authority.

4.27. **Consultation and Community Involvement**

- 4.28. The applicant's Statement of Community Involvement (SCI) sets out the consultation took place prior to the submission of planning application reference HGY/2021/1771. The application scheme comprises modest design updates to this previous application and therefore is considered to remain of relevance. It undertook consultation in April and May 2021, January 2022, at pre-application stage. This includes: letters, adverts in 2 x local newspapers and leaflets and news letters to over 4,400 local residents and businesses inviting comment on emerging proposals and publicising two webinars; a dedicated section on the applicant's website with information about the emerging proposals and a feedback form and 2 x webinars, with 8 and 34 attendees. Emerging proposals were also discussed at the applicant's regular Business and Community Liaison Group.
- 4.29. The applicant's Design and Access Statement and associated agenda details further consultation meetings and workshops with Officers, the GLA, QRP and the Health and Safety Executive .

5. CONSULTATION RESPONSE

- 5.1. 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 Economic Regeneration
- LBH Education (School Places Planning)
- LBH Emergency Planning and Business Continuity
- LBH Health in all Policies
- 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
- 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)

5.2. 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 revised design is code compliant and would be an acceptable solution under Building Regulations

Carbon Management – No objections subject to conditions and S106 obligations

Conservation Officer – No objections

Design Officer – Support for the proposed design

Ecology Officer – No objections to the previous proposal

Lead Local Flood Authority – The proposed surface water drainage arrangements are considered to be acceptable.

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Pollution – No objection, subject to conditions on Land Contamination, Unexpected Contamination, NRRM and Demolition/Construction Environmental Management Plans.

Public Health – No comments received.

Regeneration – No comments received.

School Places Planning – Satisfied that there is sufficient school capacity – no specific comments on the previous proposal.

Transportation – The proposal, subject to conditions and obligations would have acceptable transportation impacts.

TFL – No objection subject to conditions securing a Road Safety Audit, Electric Vehicle Charging Points, Car Parking Management Plan, Travel, Deliveries and Servicing and Construction Logistics Plan and a Permit Free Planning Obligation and £195,000 contribution towards bus service improvements being secured.

Tree Officer – All 4 Category A trees, on the Depot part of the site next to the High Road, would be retained. Robust tree protection measures must be used to ensure these are safeguarded. An arboricultural method statement is required for any works in the RPA of any trees. The proposed landscaping includes a significant number of additional trees which should be secured by condition with associated maintenance plan.

Waste Management – Detailed requirements for refuse, recycling and food storage set out (based on guidelines). Commercial occupiers must arrange for scheduled waste collection. RAG traffic light status AMBER.

External:

Cadet Gas – Noted on the previous proposal that there is gas apparatus within the site and advice is given to the developer over the necessary liaison with and consents from the company.

Enfield (London Borough of) –No comment received.

Environment Agency - The EA has assessed the proposals as having a low environmental risk and has no comments to make (other than that other consents from the EA may be required) (the same comment made in relation to the scheme as revised).

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

Historic England – Archaeological Service (GLAAS) – Recommend that a Stage 1 Written Scheme of Investigation and details of foundation design is secured by planning condition.

London Overground Infrastructure Protection – No objection subject to a condition relating to demolition/construction method statement.

London Fire Brigade – The proposed scheme would comply with the London Fire Brigade's requirements for firefighting access.

Metropolitan Police (Designing Out Crime Officer) – No objection in principle, to the previous proposal 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.

Mayor of London – The Mayor's Stage 1 Report states that the application does not fully comply with the London Plan for the reasons set out below (with possible remedies being set out as to how these deficiencies could be addressed):

- Land use principles - Further optimisation of the site's potential development capacity over and above the extant planning permission is supported as part of a comprehensive residential led mixed-use scheme (paragraphs 27 to 32);
- Housing and affordable housing - 36% affordable housing (by habitable room) comprising 40% low cost rent and 60% intermediate housing is proposed, with provision for the overall quantum of affordable housing to be increased to 40% affordable housing with grant. The proposed tenure split complies with the Tottenham Area Action Plan (paragraph 37 to 49);
- Urban design - The layout, landscaping, density and residential quality is supported. (paragraph 52 to 57);
- Heritage - The scheme would cause less than substantial harm to a number of designated heritage assets. As such, the public benefits associated with the application will need to outweigh this harm. This could be the case in this instance, subject to these benefits being secured at Stage 2 and further clarification on a number of issues (58 to 62);
- Tall buildings - Tall buildings are proposed in a location which is identified as suitable for tall buildings. The scheme complies with the qualitative assessment criteria in Policy D9 (66-73);

- Transport – A financial contribution of £195,000 is required for bus service improvements. Further details on the design quality of cycle parking facilities is required. A review of the proposed southern site access is required, together with Stage 1 Road Safety Audits (paragraph 85 to 101); and
- Climate change and environmental issues - The energy, urban greening and drainage strategies are acceptable. The applicant is proposing to connect the site to the planned Lee Valley District Heat Network. This is strongly supported and should be secured. Additional energy efficiency measures were also encouraged (paragraph 102 - 108).

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

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

Natural England – No comment with regards to statutory designated sites. Reference to Standing Advice on protected species.

Network Rail – Comments in relation to works next to the railway (Demolition, Scaffolding/Plant, Boundary Treatments, Maintenance Access, Railway Encroachment, Materials, Lighting, Drainage, Track Support Zone, Overhead Line Equipment and Site Layout).

NHS Clinical Commissioning Group – There is no guarantee that CIL receipts will be allocated towards increasing capacity. There is a site-specific impact from this development proposal which cannot be directly mitigated using a CIL payment. A s106 contribution of £442,020 is requested (based on HUDU Planning Contributions Model).

Sport England – The Council could seek contributions through CIL or s106 planning obligations – but it is not clear if, or how, the Council intends to mitigate the impact on demand for local sport facilities. If the Council intends to use s106, then the Sports Facilities Calculator could help indicate the likely demand for certain sports type facilities. Encourage the use of the Sport England/Public Health England 'Active Design' guide to help ensure the scheme incorporates opportunities for people to take part in sport and physical activity.

Thames Water – Waste - no network infrastructure capacity objections in relation to foul water and surface water, but recommend that petrol/oil receptors are fitted to car parking/washing/repair facilities to void oil polluted discharges entering local watercourses. Water – Request for conditions to safeguard water mains and other underground water assets. Unable to determine the infrastructure needs of this application. Should the Council look to approve the application ahead of further information being provided, a 'Grampian Style' condition should be applied. Informative should alert developers to underground water assets on the site.

Waltham Forest (London Borough of) - No comments.

LOCAL REPRESENTATIONS

5.1. Notification was sent to the following:

- Letters to neighbouring properties
- 1 notices erected in the vicinity of the site

5.2. A Further consultation was carried out on 22nd May 2023 following the receipt of amended plans

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

No of individual responses: 30.

Objecting: 24 from 20 separate addresses, including Cannon Road Residents' Association

Supporting: 5 from 3 separate addresses.

Others: 2.

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 proposed Depot Block A would be closer to the existing River Apartments than previously approved (approx. 33m rather than approx. 50m) and also more directly south – not in accordance with the HRMF.
- Adverse impact on daylight, sunlight, overshadowing and privacy of residents of River Apartments.
- Noise Impact Assessment does not take account of existing noise
- Adverse impact on well-being of residents and school children across the Cannon Road area.

- Adverse impact on daylight/sunlight, overshadowing and privacy of residents of other residents.
- Standard of accommodation
- Design and materials are not high quality
- Proposed heights are excessive
- Excessive density
- Insufficient green space
- Structural stability of surrounding buildings
- Disruption during demolition and construction phase.

Support:

- 3 x general support for regeneration

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

- Loss

6. MATERIAL PLANNING CONSIDERATIONS

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

1. Principle of the Development
2. Policy Assessment
3. Affordable Housing
4. Development Design
5. Residential Quality
6. Social and Community Infrastructure
7. Child Play Space
8. Heritage Conservation
9. Impact on Amenity of Adjoining Occupiers
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. Conclusion

6.2 Principle of the development

6.2.1 Policy Background

6.2.2 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.

6.2.3 *The Development Plan*

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

6.2.5 A number of plans and strategies set the context for Tottenham’s regeneration. These documents should be read in conjunction with the AAP. 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.

6.2.6 The Council is preparing a new Local Plan and consultation on a Regulation 18 New Local Plan First Steps documents 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. It has very limited material weight in the determination of planning applications.

The London Plan

6.2.7 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 the next 20–25 years. The London Plan (2021) sets a number of objectives for development through various policies. The policies in the London Plan are accompanied by a suite of Supplementary Planning Guidance (SPGs) and London Plan Guidance that provide further guidance.

Upper Lea Valley Opportunity Area Planning Framework

6.2.8 The Upper Lea 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.

6.2.9 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

6.2.10 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 development plan document (DPD) and Tottenham Area Action Plan (AAP) give effect to the spatial strategy by allocating sufficient sites to accommodate development needs.

Strategic Policies

- 6.2.11 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. The Council will promote the most efficient use of land in Haringey.
- 6.2.12 SP1 requires that development in Growth Areas maximises site opportunities, provides appropriate links to, and benefits for, surrounding areas and communities, and provides the necessary infrastructure and is in accordance with the full range of the Council's planning policies and objectives.

Tottenham Area Action Plan

- 6.2.13 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.
- 6.2.14 The AAP indicates that development and regeneration within Tottenham will be targeted at four specific neighbourhood areas including North Tottenham, which comprises the Northumberland Park, the Tottenham Hotspur Stadium and the High Road West area.

NT5 Site: High Road West

- 6.2.15 The site allocation for the wider area (NT5 – High Road West) covers approx. 11.69ha and calls for a master planned, comprehensive development creating a new residential neighbourhood (with a net increase of 1,200 dwellings) and a new leisure destination for London. The residential-led mixed-use development is expected 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.
- 6.2.16 The NT5 site allocation contains site requirements, development guidelines and sets out the steps for undertaking estate renewal. These are set out below. The application of relevant site requirements, development guidelines and estate renewal steps to the application site is set out in the sections following.

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.

6.2.17 The THFC Stadium is the first stage of wider regeneration, and the intention is for it to be fully integrated within the comprehensive regeneration of High Road West and Northumberland Park. The priority is to ensure that on match and non-match days, the area is lively and attracts people to make the most of the stadium development, the High Road, and wider urban realm improvements that will take place as part of this development. Provision is therefore proposed for new community facilities and leisure orientated retail development to further build and cement the area's reputation as a premier leisure destination within North London.

High Road West Master Plan Framework (HRWMF)

6.2.18 Policy AAP1 (Regeneration and Master Planning) indicates that 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 the AAP.

6.2.19 The current approved High Road West Master Plan Framework (HRWMF) is that prepared by Arup in September 2014. This highlights opportunities for improvement and change in the subject area and identifies where housing, open space and play areas, as well as community, leisure, education and health facilities and shops could be provided. The HRWMF also helps to demonstrate how the growth and development planned for High Road West could be delivered through strategic interventions over the short to longer term.

6.2.20 The Council has entered into partnership with Lendlease who since the appeal decision have received planning permission for the comprehensive redevelopment of a substantial proportion of Site Allocation NT5 (including the application site).

6.2.21 5 Year Housing Land Supply

6.2.22 The Council at the present time is unable to fully evidence its five-year supply of housing land. The 'presumption in favour of sustainable development' and paragraph 11(d) of the NPPF should be treated as a material consideration when determining this application, which for decision-taking means granting permission unless the application of policies in the NPPF that protect areas or assets of particular importance provides a clear reason for refusal or any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in the NPPF taken as a whole. Nevertheless, decisions must still be made in accordance with the development plan (relevant policies summarised in this report) unless material considerations indicate otherwise (of which the NPPF is a significant material consideration).

6.3 **Policy Assessment**

Loss of Existing Retail and Education Uses

6.3.1 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 centres. AAP Site Allocation NT5 does not seek to retain large-format retail on the site, but rather seeks to either enlarge the existing North Tottenham Local Centre or create a new local centre.

The existing out-of-centre retail store (4,760sqm (GIA)) and five small retail units

(319sqm (GIA)) date from the early 1980s and the main store was originally occupied by Sainsbury's. Following planning permission in March 2012 for a larger retail store (12,170sqm (GIA)) on Northumberland Park on the edge of the Tottenham High Road North Local Centre as part of THFC's stadium project, Sainsbury's re-located to that new larger store. The existing store on the site is currently occupied by B&M, a grocery and general merchandise store. Three of the small units are occupied by a grocer, hair dressers and pharmacy and three are vacant. The applicant's Regeneration Statement (3.2) identifies the existing occupied floorspace is estimated to support approx. 160 FTE jobs.

6.3.2

6.3.3 The proposed loss of the existing out-of-centre large retail store and five small retail units is consistent with the development plan's 'town centres first' approach to retail provision and the Site Allocation and is acceptable in principle. The proposed scheme includes 2,068sqm (GEA) of flexible commercial (E Class) uses, discussed below.

6.3.4 The proposals would also result in the loss of the existing education (F1(a) use in Nos. 867-869 High Road (approx. 806sqm). The continued use of these properties for this purpose was permitted in 2011 and the buildings are currently partly used for adult education/office purposes. Whilst London Plan Policy S3 seeks to safeguard education uses, the proposals would facilitate the conversion of the Listed Buildings back to their original use (which is considered to be the best use of heritage assets) and officers consider that an exception to policy would be acceptable. The proposed loss of retail and education uses has been granted permission by the extant Depot consent.

Loss of Existing Industrial Premises/Land

6.3.5 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.

6.3.6 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 small and medium sized businesses that need employment land and space. Policy DM40 seeks to facilitate the renewal and regeneration (including intensification) of existing employment land and floorspace in accessible locations.

6.3.7 The site includes the Carbery Enterprise Park (11 x 2-storey units and approx. 10 x car parking spaces) comprising approx. 1,125sqm (GIA) of Use Class E (i) and (iii) office/ light industrial space, and Use Class B2 general industrial space. The rest of the Goods Yard part of the site was formally a goods yard, then, as recently as April 2016, a scrap yard (*Sui Generis*). The clearance of buildings and infrastructure associated with the scrap yard was authorised by the temporary permission for use of this land as a construction compound for the building of the new stadium. The Environment Agency approved an application by Redcorn Limited to surrender the Waste Management Licenses for the site. This part of the site currently has temporary permission for car parking associated with the stadium. The applicant's Regeneration Statement (3.4) identifies the existing occupied floorspace is estimated to support approx. 30

- 6.3.8 Given that the site as a whole forms part of Site Allocation NT5 allocated in the development plan and the proposed scheme also incorporates flexible commercial space, including some replacement employment floorspace (as discussed below) the loss of 1,125sqm (GIA) of 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 from the Carbery Enterprise Park to new premises within the development, or failing that, at other locations in the Borough.

Loss of Existing Housing

- 6.3.9 London Plan Policy H7 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.
- 6.3.10 The Station Masters House is vacant residential space, which is understood was last used as one large home, with a small 1-bed flat located in the ground floor annex. The proposed conversion and extension of this building for café/restaurant use (Use Class E(a)), would result in the loss of approx. 175sqm (GIA) of residential floorspace. However, no occupants would be displaced and the very significant additional amount of residential floorspace outlined below makes the loss of residential space here acceptable in principle.

Principle of Proposed Flexible Commercial Uses

- 6.3.11 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, make provision of affordable workspace where viable, safeguard residential amenity, do not conflict with retained employment use and connect to ultra-fast broadband).
- 6.3.12 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 (4,350sqm) and town centre uses (11,740sqm) (16,090sqm overall).
- 6.3.13 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. The principles of the plan also seek to provide a range of retail and commercial units to encourage a greater mix and wider retail offer.
- 6.3.14 The proposed scheme includes 2,068sqm (GEA) of flexible commercial uses (Class E) approximately 2,00sqm more than proposed in the appeal scheme. This would include the conversion of the Station Masters House (both floors) and the provision of a number of ground floor commercial units (ranging

- GY Station Master's House – approx. 216sqm;
- GY Block H – approx. 698sqm (facing White Hart Lane and proposed north/south street);
- GY Blocks E, F and G – three units (approx. 188, 185 and 244sqm) (facing the proposed southern square and north/south street);
- D Block ABC – approx. 130sqm (facing the proposed northern square and Peacock Park); and
- D Block G – approx. 215sqm (facing the proposed Peacock Park).

6.3.15 The proposed conversion of the School Masters House to flexible retail. The proposed new commercial units would be for flexible commercial uses falling within Use Class E – which includes retail, cafes/restaurants, office/light industry, health/ fitness and health facilities, creches, day nurseries and day centres.

6.3.16 The proposed amount of commercial floorspace proposed is considered to make a proportionate contribution to NT5 allocated requirements for commercial uses and is generally consistent with guidance in the HRWMF. In line with the extant Goods Yard consent, it is recommended that a planning condition secures at least 400sqm of the proposed space as office, R&D, light industrial (Use Class E(g) (i)(ii)(iii) to mitigate the loss of the Carbery Enterprise Park.

6.3.17 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 Provision of Housing

6.3.18 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.

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

6.3.20 The Tottenham AAP identifies and allocates development sites with the capacity to accommodate new homes. The wider High Road West area is allocated in the AAP (NT5) as an appropriate place for residential development alongside a mix of other uses and call for a minimum of 1,400 homes and a net increase of 1,200 homes). 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 1,178 dwellings still to be provided.

6.3.21 Given the above, the principle of the provision of new homes on the site (alongside a mix of other uses) is acceptable. The proposed scheme would deliver 844 new homes. The proposed conversion of the Station Master's House (No. 52 White Hart Lane) (currently vacant). The proposals would therefore result in a net gain of 843 homes. This is 23 less homes than the extant Goods Yard and Depot Permission allowed at appeal (reference HGY2021/1771) and 197 more than the previous Goods Yard and Depot Permissions combined

- 6.3.22 The ES (Chapter 7) 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 Moderate beneficial effect at the borough level (when considered in isolation and alongside the cumulative schemes). Officers agree.

Principle of Comprehensive Development

- 6.3.23 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:

- 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) Optimises development outcomes on the site.

- 6.3.24 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”.

- 6.3.25 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 material consideration when determining planning applications.

- 6.3.26 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. The various sites north of White Hart Lane are expressly set out in Table 2 of Policy AAP1 as requiring a comprehensive redevelopment approach.

- 6.3.27 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

- 6.3.28 Although HRMF seeks to ensure that the site is brought forward in a comprehensive manner, the phasing provisions of the HRWMF explicitly recognise existing land ownership. Indeed, Phase 1A (Cannon Road area) was delivered independently. This acknowledgement that component parts of site allocations may be progressed separately (subject to them not prejudicing the delivery of the Site Allocation and HRWMF) was confirmed by the Goods Yard Appeal Decision in June 2019 and again by the Council's and the Planning Inspectorate's decision to grant permissions for various parcels of land within the site allocation.
- 6.3.29 The applicant is proposing to develop four parts of Site Allocation NT5 that it owns (the Goods Yard, the Depot, No. 807 High Road and the Printworks). This application is supported by a masterplan that demonstrates that the development of the combined Goods Yard-Depot site could be satisfactorily developed without prejudicing the delivery of the wider NT5 Site Allocation.
- 6.3.30 There are a number of key interfaces with existing and future adjoining spaces that would need to be secured in order for the proposed scheme to be acceptable. These are addressed in more detail under Development Design, but in summary relate to (i) connectivity with the existing Cannon Road area; (ii) access to and use of the proposed Embankment Lane and Northern Square by occupiers of future development to the east and south; (iii) access to and use of the proposed Pickford Yard Gardens by residents of future housing to the south; and (iv) safeguarding the possibility of an east-west pedestrian/ cycle bridge between the site and Pretoria Road to the west.

Principle of the Development – Summary

- 6.3.31 The provision of a residential-led mixed-use scheme comprising housing and commercial uses is acceptable in principle. The incremental development of Site Allocation NT5 is acceptable in principle, providing that the proposed development does not prejudice the future development of other parts of the Site, Allocation, or frustrate the delivery of Site Allocation NT5 or wider area outcomes sought by the site allocation. It would also be necessary to use s106 planning obligations to secure a satisfactory access to the Cannon Road area to the north and future development plots to the east and the safeguarding of a potential future pedestrian/cycle bridge.
- 6.3.32 The applicant has requested that any planning permission is given a 5-year life, rather than the standard 3-years. The Goods Yard and Depot extant consents allow for an implementation period of between 4 and 5-years and a 5-year life for any new permission would give more time for the applicant to work constructively with the Council's development partner Lendlease over development of land to the north of White Hart Lane.
- 6.3.33 Fall-back Position. The extant schemes would similarly safeguard the development potential of adjoining land and allow for the comprehensive regeneration of Site Allocation NT5 over time.

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- 6.3.34 The proposed scheme would result in the same loss of existing uses as with the extant schemes (namely retail and education use at Nos. 867-869 High Road, vacant housing at the Station Master's House and industrial units at the Carbery Enterprise Park).
- 6.3.35 The amount of proposed non-residential commercial uses in the proposed scheme (2,040 sqm GIA) is slightly more than in the previous consents (up to 1,887sqm GIA) and, subject to a planning condition, the same minimum 400sqm industrial uses would be secured.

6.3.36 Although there would 23 less dwellings than the extant permission in-principle support remains for additional housing, with new London Plan housing targets, Housing Delivery Test measures and changes to the NPPF all strengthening the policy requirement for additional homes.

Development Density

6.3.37 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 (which no longer refers to a density matrix as a guide). 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.

6.3.38 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. The extant the Goods Yard and Depot Appeal Scheme has a density of 1,116 rooms/ha (353 units/ha).

6.3.39 The proposed scheme would have a density 346 units/ha. This is just below the definition of 'higher density' development in the London Plan (350 units/ha). 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; and
- Social infrastructure – Social & Community Infrastructure.

6.3.40 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.

6.3.41 Fall-back Position. The extant Goods Yard and Depot appeal scheme has a density of (353 units/hectare). The schemes were considered acceptable in relation to the density factors listed above.

Dwelling Unit Mix

6.3.42 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.

6.3.43 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.

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

Table 05: Proposed dwelling mix

Bedroom Size	No. of Units	% by unit
1 bed 2 person	243	29
2 bed (3 & 4person)	426	50
3 bed (4, 5 & 6 person	165	20
4 bed (6 person)	10	1
Total	844	100%

6.3.45 The proposed dwelling mix is 79% 1 and 2 bed units and 21% family sized housing. However, 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.

6.3.46 Fall-back Position. Whilst the proposed development would deliver less homes than the approved Goods Yard and Depot Appeal Scheme, it would deliver a greater proportion of family sized homes.

Policy Background

- 6.4.1 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.'
- 6.4.2 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.
- 6.4.3 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%.
- 6.4.4 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.
- 6.4.5 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).

Amount, type, location and phasing of Affordable Housing

- 6.4.6 It was accepted on the appeal scheme that the only 'industrial land' (for the purposes of London Plan Policy H5) within the site is the Carbery Enterprise Park taking account of the planning history of this part of the site, the current use of the land.
- 6.4.7 The application adopts a blended approach to affordable housing provision to benefit from the fast track approach enabled by London Plan Policy H5 (C): 35% for the Depot site, 50% for that part of the Goods Yard site occupied by the Carbery Enterprise Park ('industrial land') and 35% for the remainder of the Goods Yard site as set out in Table 06 below. This amounts to the need for 36% affordable housing (by habitable rooms).

Table 06: Calculation of Fast Track Target

Site Component	Use	Site Area (sqm)	Site %	Policy H6 Threshold	Affordable Hab Room Target %
Carbery Enterprise Park	Industrial	1,546	6%	50%	3.09%
All other land	Non-Industrial	23,479	94%	35%	32.84%
		25,025	100%		35.93%

- 6.4.8 Other requirements of London Plan Policy H5 (C) are met as follows:

- The proposed tenure split meets the required relevant tenure split (see below);
- The proposed scheme would meet other relevant policy requirements and obligations – including financial contributions towards community facilities and social infrastructure (Community Space, Library and Public Realm) as called for in the Site Requirements of Site Allocation NT5; and
- The applicant has committed to increase the amount of affordable housing to 40% (by habitable room) if grant is made available - taking account of the Mayor's strategic target.

- 6.4.9 Overall residential component. The overall residential component of the proposed scheme is set out in Table 07 below

Table 07: Proposed residential component

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

6.4.10 Tenure Split: The scheme proposes 40% Low-Cost Rent and 60% Intermediate by habitable room as set out in Table 08 below.

Table 08: Proposed Affordable Housing Tenure Split

Tenure	Units	Hab Rooms	% Hab Rooms
Low-Cost Rent	99	359	40%
Intermediate	193	540	60%
Total	292	899	

6.4.11 Unit Size Mix: The scheme proposes a mix of affordable housing unit sizes including 49% 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
Low-Cost Rent	13	43	33	10	99
	13.1%	43.4%	33.3%	10.1%	100%
Intermediate	73	87	33	0	193
	38%	45%	17%	0%	100%

6.4.12 Wheelchair accessible homes: The proposals include 10% of homes designed to meet Building Regulation M4 (3) ('Wheelchair User Dwellings'). These proposed homes are distributed across tenures as set out in Table 10 below.

Table 10: Proposed Wheelchair User Dwellings by tenure

	1-bed	2-bed	3-bed	4-bed	Total
Market	16	10	10	0	36
Low-Cost Rent	3	5	3	0	11
Intermediate	12	17	9	0	38
	31	32	22	0	84 (10%)

6.4.13 Distribution: The affordable housing would be distributed across the site in various buildings, as outlined in Table 11 below. Low-Cost Rent homes would either be independently accessed from the street or would have their own discreet stair/lift cores. Some proposed Intermediate homes would share common stair/lift cores with Market homes.

Table 11: Proposed Tenure Distribution

Building*	Market	Affordable	Total
Goods Yard			
Block A	198	0	198
Block B	123	71	194
Block C	0	14	14
Block D	0	8	8
Block E	24	0	24
Block F	0	19	32
Block G	143	17	17
The Depot			
Block A	143	50	193
Block B	0	43	43
Block C	16	0	16
Block D	0	32	32
Block E	20	0	20
Block F	4	0	4
Block G	22	0	22
Total	552	292	844

6.4.14 Design & Management: All proposed homes have been 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 and be able to access the same amenities and open space and the scheme has been designed to ensure estate service charges are as affordable as possible, whilst allowing all residents the right to access on-site amenities.

6.4.15 Grant Funding: If grant becomes available, the provision of affordable housing on-site would be increased to up to 40% Affordable Housing, again consistent with the extant planning permissions. The exact amount, location, tenure and unit mix of any additional affordable housing to be provided on-site would need to be agreed with the LPA.

Affordability

6.4.16 The proposed Low Cost Rent homes would be London Affordable Rent or Social Rent (if required by the Council). Where it did so, the first 61 Council purchased homes would be at Social Rent, if required by the Council to support its estate renewal objectives. In that scenario, the remainder would be at London Affordable Rent.

- 6.4.17 London Affordable Rent is a form of Affordable Rent, for legal and regulatory purposes, but whereas nationally the cap on Affordable Rent is no more than 80% of market rent, the Mayor does not consider 80 per cent of market rent to be genuinely affordable in most parts of London.
- 6.4.18 Once let, London Affordable Rent homes would be subject to rent-setting guidance issued by the Social Housing Regulator and will be subject to the annual one per cent rent reductions. Providers will be able to re-let at up to the applicable benchmark level, uprated annually, or at an otherwise agreed level, as appropriate and in line with legislation and Regulator guidance. The benchmark rents do not include service charges, which may be charged in addition. Rents for London Affordable Rent homes have to be set in accordance with the Social Housing Regulator's Affordable Rent guidance. The landlord of these homes must be registered with the Social Housing Regulator.
- 6.4.19 The proposed Intermediate homes would be Shared Ownership. The units would be sold at the minimum 25% share of equity and rental on the unsold equity up to 2.75%. In line with the current London AMR the income threshold would not exceed £90,000. 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. If planning permission were granted, it would be appropriate to use s106 planning obligations 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.
- 6.4.20 The applicant's affordable housing offer is in accordance with the Tottenham Area Action Plan. However, while the proposed marketing of the London Living Rent units conforms to the Mayor of London's Plan and Housing Strategy, it is not strictly in accordance with the Haringey Intermediate Housing Policy marketing targets.

Viability Review

- 6.4.21 In accordance with London Plan Policy H5, it is recommended that s106 planning obligations secure an Early-Stage Viability Review. and 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.

Contribution towards regeneration

- 6.4.22 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.

6.4.23 A key NT5 site requirement is the re-provision of existing Social Rented Council homes arising from the demolition of the Love Lane Estate. The Love Lane Estate contains 297 homes and lies to the south of White Hart Lane, within the NT5 Site Allocation. The Estate was built in the 1960's and includes three 10-storey 'Y' shaped blocks and several four storey slab blocks. The HRWMF calls for the demolition of the Love Lane Estate as part of the delivery of the wider NT5 site and the approved masterplan.

6.4.24 The requirements of NT5 in respect of the form of affordable housing are therefore different from those in other parts of the Borough. In order to facilitate the comprehensive redevelopment of the NT5 site and facilitate estate renewal, and taking account of the phasing proposed in the HRWMF which identifies the application site as forming the vast majority of Phase 3, the application site will need to provide a proportionate quantum of Social Rented housing to address the loss on the Love Lane Estate.

6.4.25 In order to make a positive contribution towards the renewal of the Love Lane Estate, the applicant has agreed that the Council would be offered the first right to purchase up to 61 of the proposed 99 Low Cost Rent homes. This offer is on the basis that the Council would purchase these homes at an agreed price (per square foot, index linked) and that whilst the first 61 of any purchased homes could be at Social Rent, any additional purchased homes would be at London Affordable Rent. Officers consider this to be an acceptable contribution towards estate renewal.

Affordable Housing - Summary

6.4.26 Officers consider that both the amount and type of proposed affordable accommodation are acceptable, subject to approval of details and Early and Development Break Reviews.

6.4.27 Fall-back Position. Compared with the two extant consents for the site (HGY2018/0187 and HGY/2019/2929), the proposed scheme would deliver:

- 52 more affordable homes;
- 16 more Low-Cost Rent homes;
- The Council to have first right to purchase on 61 of the proposed Low Cost Rent homes

6.4.28 Fall-back Position. Compared to the Goods Yard and Depot Appeal Scheme (HGY/2021/1771)

- 18 less affordable homes;
- 4 less Low-Cost Rented homes
- 14 less Intermediate homes
- The council have first right to purchase the same number of homes

6.5 **Development Design**

- 6.5.1 The 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).
- 6.5.2 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).
- 6.5.3 Local Plan Strategic Policies DM1 and DM6 and 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.
- 6.5.4 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 CABI / English Heritage "Guidance on Tall Buildings" 2007 (since superseded in 2015). DM6 part C sets out detailed policy requirements for tall buildings; being in an area identified as suitable, represent a landmark by which its distinctiveness acts as a wayfinder or marker, is elegant and well proportioned, visually interesting when viewed from any direction, positively engage with the street environment, consider impact on ecology and microclimate, going onto requiring where tall buildings are in close proximity to each other they avoid a canyon effect, consider their cumulative impact, avoid coalescence and collectively contribute to the vision and strategic objectives for their area.
- 6.5.5 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.
- 6.5.6 The Upper Lee Valley Opportunity Area 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.

- 6.5.7 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.
- 6.5.8 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.

Site Layout

- 6.5.9 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.
- 6.5.10 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.
- 6.5.11 In response, the proposed scheme for the Goods Yard-Depot site can be seen to comply with the following relevant HRWMF principles by:
- Retaining, refurbishing and enhancing the immediate setting of Nos. 867-869 High Road (Grade II Listed) and No.34 White Hart Lane (The Station Master’s House (a locally listed building;
 - Providing an east-west street and a north-south street running across the site to

connect into the wider masterplan phases – both including a clear distinction between vehicular and pedestrian spaces creating threshold spaces between this route and homes that would front it;

- Including a commercial unit in the north west corner of the proposed Northern Square, connecting through to the east to also front the proposed Peacock Park in a location consistent with the HRWMF;
- Providing three tall buildings along the west of the site to create a spine of tall buildings alongside the railway (although these are not in the location envisaged and do not descend in height from the existing River Apartments building as envisaged – see discussion below);
- Providing a new public park, Peacock Park (capable of being extended southwards) at the heart of the Depot part of the site, with a north-south street

and other public spaces creating links through the site to access White Hart Lane Station;

- Providing a range of housing typologies with a mix of courtyard and other blocks, including ground and first floor maisonettes with many of the characteristics of townhouses, 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; and
- Allowing for partial courtyard blocks created by Depot Block G and further mixed-use/residential buildings on the Peacock Industrial Estate land to the south. See discussion below.

6.5.12 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 block and three tall buildings. There would be a good, clear, front to back relationship and proposed refuse stores and cycle parking would generally be internalised to avoid these having a negative effect on the street environment. This should all help ensure a safe and secure development and an active public realm.

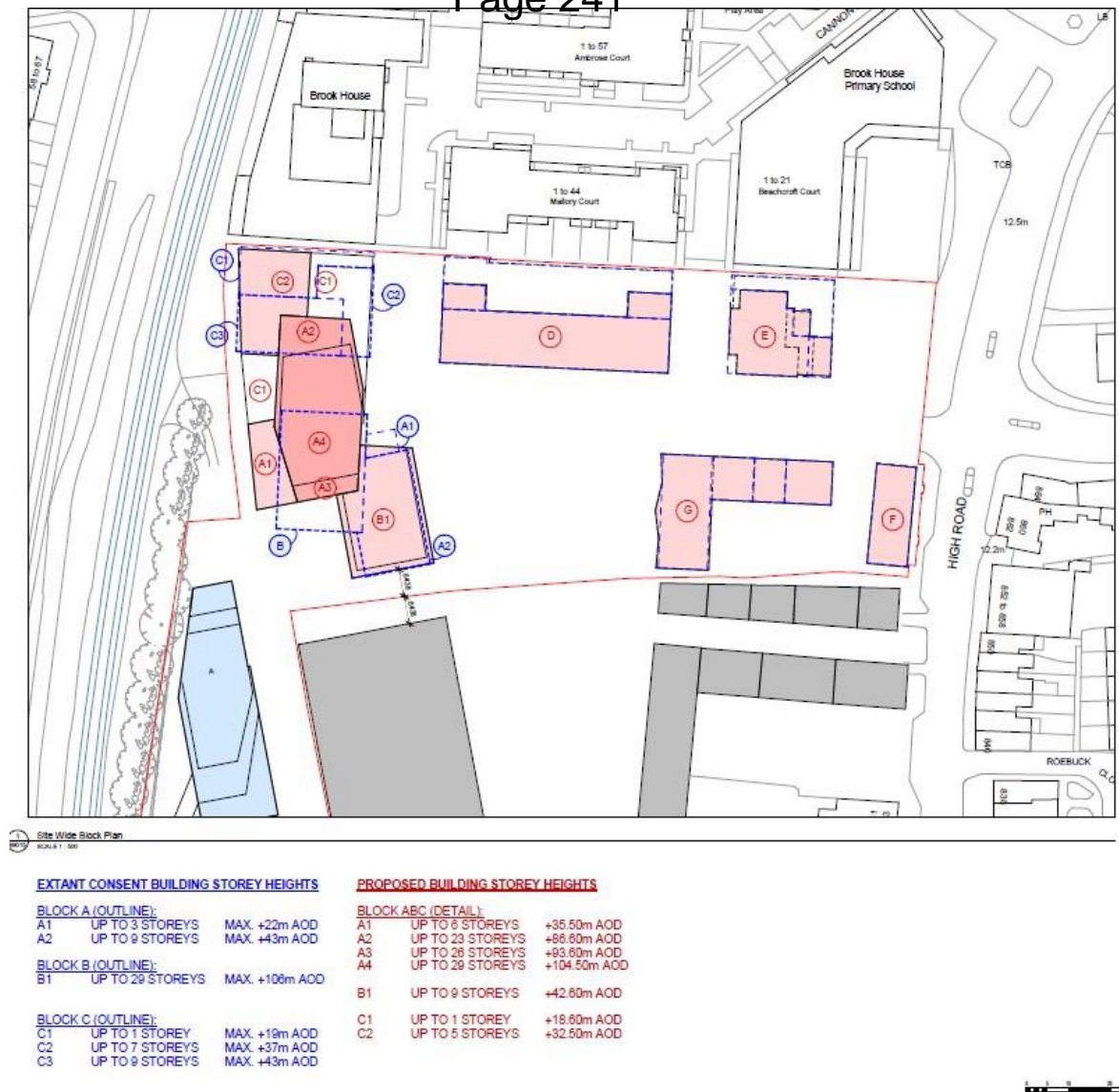
6.5.13 However, the proposed layout would differ from the HRWMF's relevant principles and indicative masterplan in three ways, discussed below:

i. The western edge. The HRWMF envisages a north-south street running along the western boundary of the Goods Yard part of site, next to the railway. The proposed scheme moves this proposed street to the east and proposes a private communal garden along this edge, with proposed tall buildings (Goods Yard Blocks A and B) and Goods Yard Block closer to this edge. The proposed scheme also proposes three tall buildings that are more evenly spaced than shown in the HRWMF and approved in the extant Goods Yard and Depot schemes, which would mean that these buildings would be more closely aligned with the east-west routes envisaged for the remaining part of the High Road West site. A similar arrangement was previously approved, at appeal (application reference HGY/2021/1771).

Officers welcome the proposed location of a north-south street away from this boundary as this would allow for a safer and more attractive two-sided street in the future, and that would be more legible and better connected into wider street networks from the start. Furthermore, the proposed private communal Walkway on the western boundary would bring welcome gains in urban greening and biodiversity.

This would result in some homes being closer to the railway than originally envisaged/ previously approved. However, amenity issues for future residents are considered acceptable (see Impact on Amenity on Adjoining Occupiers). The proposed more even spacing of the proposed tall buildings is also considered acceptable in principle and would better align these buildings with longer-term proposed east-west routes linking with the High Road (to and from Brunswick Square, a new route on the current timber yard and the proposed Pickford Lane), helping to terminate street views and assist wayfinding and legibility.

ii. Location of proposed Depot Block A. The site does not include as much Network Rail land along its western edge as envisaged in the HRWMF. This has resulted in the proposed tall building (Depot Block A) being located further to the east than envisaged in the guidance – although proposed Block A is a similar distance away from the railway as the approved tower in the extant consents. This, and the location of proposed Goods Yard Blocks A and B closer to the railway, as discussed above, means that the proposed scheme would not result in such a clear ‘spine of tall buildings’ envisaged by the HRWMF. The ‘evening out’ of the proposed three towers also means that proposed Depot Block A would be closer to the existing Rivers Apartments building than envisaged in the HRWMF and approved by the extant Depot consent. However, the proposed Depot Block C immediately to the south of Rivers Apartments would be lower than the approved Block C in the extant Depot consent. The block has been set back a further 3-7 metres from the shared boundary with the Rivers Apartments building when compared to the scheme allowed at appeal (reference HGY/2021/1771). See Figure 02 below.



The Cannon Road Residents Association and a number of individual residents of Rivers Apartments have objected to both the proposed alignment and closer proximity of proposed Block ABC to their homes.

- The tower has been set 3 – 7 meters further back from Riverside Apartments than the Depot and Goods Yard Scheme approved at appeal (reference HGY/2021/1771)
- The floor plan geometry of the proposed tower has been faceted to present its most slender face to the north and south façades, enabling oblique views looking south passed the proposed east and west facades;
- The proposed stepped 'top' of the tower has been biased to the south, so that the upper storeys, to be further away from Rivers Apartments. The terrace formed by the proposed stepped

'top' would be similar to the top most storey of Rivers Apartments;

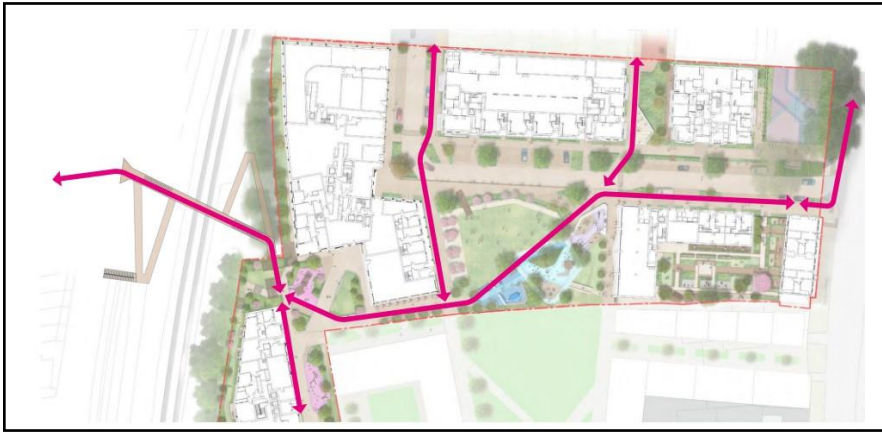
- The lower portion of the proposed tower base and shoulder blocks are 5-stories (reducing the amount of mass and façade immediately facing the lower 7 floors of Rivers Apartments, than compared to consented Depot Scheme (HGY/2021/3175))

The amenity issues for residents of Rivers Apartments are addressed under Impact on Amenity of Adjoining Occupiers below and, in summary, are considered to be acceptable. Taking all these considerations in to account, officers consider that the proposed location of Depot Block A is acceptable.

iii. Location of proposed Goods Yard Block B. The proposed 27-storey Goods Yard Block B would be approx. 105m north-west of The Grange Listed Building (Grade II), in a similar location as the scheme allowed at appeal (reference HGY/2021/3175). The approved 18-storey Goods Yard Block C in the previously permitted scheme (HGY/2018/1087) would be approx. 86.5m to the north-west of the listed building.

iv. Potential future bridge. The HRWMF identifies the opportunity to create an east-west pedestrian/cycle route across the site and the railway lines, between Brantwood Road in the east and Durban Road in the west – as an extension of a proposed east-west street (the proposed Pickford Lane). The extant Depot consent allows for a bridge on this alignment (subject to technical feasibility work, approval of Network Rail, funding etc.). However, the location of the previously proposed (HGY/2021/3175) conjoined Depot Blocks A,B and C would prevent a potential future bridge on this direct east-west alignment. As an alternative, the applicant's submitted Design and Access Statement (DAS) shows how it might be possible to provide a future bridge from the proposed northern square (to the south of proposed Blocks A,B and C) that would provide an east-west pedestrian/cycle connection across the site (See Figure 03 below). This arrangement was accepted as part of the scheme that was allowed on appeal (reference HGY/2021/1771). This would not provide such a direct or useful east west connection than envisaged in the HRWMF. However, officers consider that this would provide an acceptable alternative.

Figure 03: Extract from DAS showing potential future bridge across the rail line.



Relationship with existing and future development

6.5.14 The proposed re-location of Embankment Lane away from the western edge of the Goods Yard part of the site means that the eastern side of the proposed street would form the boundary with the existing Peacock Industrial Estate. Given the applicant's intended programme, this would result in the proposed GY Blocks facing/looking over existing 2-storey industrial/warehousing buildings in the interim period. In the longer term, as and when plots on the wider part of the High Road West site come forward for development (or the Peacock Industrial Estate was also redeveloped independently), this would result in the proposed GY Blocks facing/looking over mixed-use buildings with housing on upper floors. The separation distances between the existing industrial units and future mixed-use buildings would be as follows:

- GY Block A – approx. 15.5m;
- GY Block B – approx. 34m;
- GY Block C – approx. 15m;
- GY Block D – approx. 16m;
- GY Block E – approx. 15.5m;
- GY Block F – approx. 41m; and
- GY Block G – approx. 3m (the eastern flank, with fixed obscure glazing) and 19m.

6.5.15 Similarly, in the interim period, the proposed layout of the Depot part of the site, with Peacock Lane and Peacock Park and proposed adjoining buildings would result in the proposed Depot Blocks facing/looking over existing 2-storey industrial/warehousing buildings and the homes at Nos. 865 High Road. In the longer term, as and when plots on the wider part of the High Road West site come forward for development, this would result in the proposed Depot Blocks facing/looking over mixed-use buildings with housing on upper floors. The

separation distances between the existing industrial units/homes and future mixed-use buildings would be as follows:

- Depot Block A – approx. 23m;
- Depot Block B – approx. 5-7m (commercial unit on ground floor with dual-aspect homes above facing east-south and west-south);
- Depot Block D – approx. 48-54m;
- Depot Block G – approx. 1-2 and 15-17m (the southern flank would be 1-2m away, but contain only ‘blind windows’); and
- Depot Peacock Park - adjacent.

6.5.16 The adjacent blocks within Lendlease’s Scheme (HGY/2021/3175) are in the outline part of the application whereby their detailed design and siting is subject to future reserved matters approval. Notwithstanding this, Officers are satisfied that the proposed scheme would not adversely impact deliverability of the adjoining blocks, within the approved parameters.

6.5.17 The Agent of Change principle set out in London Plan Policy D13 places the responsibility for mitigating impacts from existing noise and other nuisance-generating activities or uses on the proposed new noise-sensitive development. In other words, the onus is on the applicant to demonstrate that its proposed development would not prejudice the continued operation of the existing nearby industrial and warehousing uses. This principle can be extended to other matters – such as outlook, privacy and daylight and sunlight.

6.5.18 This noise issue is addressed in detail under Residential Quality below. In summary, the noise environment for the proposed homes in the interim condition is considered acceptable. Officers are also satisfied that the location, use and layout of the proposed buildings (together with proposed interim boundary treatments, discussed below) would result in an acceptable relationship between proposed new homes and existing industrial warehousing and ensure an acceptable level of residential amenity for new residents which should not prejudice to continued operation of the existing uses.

6.5.19 In the longer term, with future high-density development on adjoining plots noise becomes less of an issue and privacy/overlooking and daylight and sunlight become more important matters. Officers consider that the proposed separation distances, layout and design of the proposed Goods Yard and Depot Blocks would enable mixed-use/residential buildings on plots to the east and south of the site to be developed in the future. However, proposed Depot Blocks B and G warrant further discussion.

6.5.20 Proposed Depot Block B would be between 6 and 7 metres from northern boundary with the existing Peacock Industrial Estate, to enable a one-sided narrow route in the interim condition (with the proposed building being in a similar position to an approved building in the extant consent for the Depot). The

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applicant's illustrative masterplan shows a new building on a redeveloped Peacock Industrial Estate being off-set by a similar amount, giving a separation distance of between 6 and 14 metres. Given the use and layout of proposed Block B (commercial use on the ground floor and dual aspect flats with primary living room windows looking east and west above), the proposed northern square and Peacock Park and its likely extension further south, this proposed future relationship is considered acceptable. This proposed relationship, which is exactly the same as allowed for in appeal permission HGY/2021/3175).

Proposed Depot Block G (together with the retained listed buildings at Nos. 867-869 High Road) would form a courtyard (Pickford Yard Gardens) to the north of the existing adjoining timber yard and homes at Nos. 865 High Road. This proposed relationship, which is exactly the same as allowed for in appeal permission HGY/2021/3175) would result in an acceptable relationship in terms of outlook, privacy and daylight. The applicant's illustrative masterplan shows how future development of these existing buildings to the south could create a residential southern edge to a courtyard. To ensure the proposed scheme does not prejudice future development of the NT5 Site Allocation, it is recommended that s106 planning obligations ensure that occupiers of any future building that adjoins Pickford Yard Gardens have access to this amenity space.

- 6.5.21 The proposed interim boundary treatment for the southern edge of the proposed Peacock Park on the Depot part of the site (discussed under Boundary Treatments below), is considered acceptable. The applicant's illustrative masterplan also shows how the proposed Park could be satisfactorily extended further south. As such, the proposed relationship should not prejudice the development of the wider High Road West site allocation in accordance with the key relevant HRWMF principles.
- 6.5.22 The proposed scheme includes proposed north-south routes both sides of Depot Block D and, if permission was granted, s106 planning obligations could require the approval of a connectivity plan to ensure acceptable detailed arrangements for connecting with the Cannon Road area to the north.

Amount, location and type of Open Space

- 6.5.23 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%).
- 6.5.24 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.

6.5.25 The proposed scheme includes provision for 15,630sqm of open space, comprising publicly accessible open space, communal residential courtyards and podium gardens and public realm (neighbourhood streets and lanes). This excludes private amenity space in the form of private balconies and terraces for individual homes. The site measures 2.5ha, or 21.3% of the Site Allocation NT5 area (11.69ha). The proposed provision of 15,630sqm of open space amounts to 39.5% of the overall area called for in the HRWMF and so would provide nearly twice as much open space as is proportionate to its size.

6.5.26 In terms of publicly accessible open space, the proposed scheme includes provision of 8,870sqm (including public realm areas). This includes the following 6 x distinct open spaces which total approx. 4,473sqm:

- White Hart Lane Gateway – approx. 300sqm
- Southern Square – approx. approx. 490sqm;
- Central Court and Trim Trail – approx. 830sqm;
- Northern Square – approx. 630sqm;
- Peacock Park – approx. 1,950sqm; and
- Brook House Yard - 430sqm outside of the school day (subject to management & maintenance agreement).

6.5.27 Based on the estimated on-site population of 1,780 people, there is a policy target for 2.97 hectares (29,684sqm) of publicly accessible open space. This reduces to approx. 18,000sqm (1.8 hectares) if 60% of the likely population is used to assess need (consistent with approx. 60% of the site being within an area of open space deficiency). The proposed 0.89ha (8,870sqm) is approx. 30% of the amount of publicly accessible open space that policy calls for (approx. 50% if the lower need is applied). Officers consider that, given the generous on-site provision of communal residential amenity space (see Residential Quality) and the overall benefits of the scheme, the amount of proposed on-site publicly accessible open space is optimised. Given this, officers consider that there would be a shortfall in the provision of publicly accessible open space.

6.5.28 The ES (Chapter 7) 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 Minor Beneficial effect at site and local level and a Negligible effect at all other spatial levels. There is no publicly accessible open space on site at present and officers accept that the proposed provision would be beneficial. There by making a positive contribution to improving open space access in accordance with policy NT5.

- 6.5.29 As discussed in more detail under the Social and Community Infrastructure heading below, CIL contributions could be used towards the delivery of additional publicly accessible open space on the wider High Road West Site (including an extension to Peacock Park immediately to the south of the site).
- 6.5.30 If permission were to be granted, it would also be appropriate to use s106 planning obligations also secure the implementation of an approved 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

- 6.5.31 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.
- 6.5.32 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 be noisier.
- 6.5.33 The applicant's Daylight and Sunlight Assessment finds that the proposed publicly accessible Station Master's House forecourt, Embankment Lane play spaces, Northern Square, Peacock Park and Brook House Yard would all receive the recommended minimum levels of sunlight (2 hours over at least 50% of the area on March 21), including in the future cumulative scenario). The exception is the proposed Southern Square, which would fall just short at 47% and a seating area to the south of Southern Square (A11) immediately to the north of GY Block G (A12), which would receive just 2-hours sun on just 1% of its area). Given the very small size of the proposed seating area and its proximity to the proposed Southern Square, this is considered acceptable.
- 6.5.34 The landscaping of the public realm is based on creating different character areas for a Neighbourhood Street (the proposed Peacock Lane and the southern part of the proposed Embankment Lane), a Neighbourhood Lane (the northern part Embankment Lane), a park and squares. The proposed spaces incorporate measures to calm traffic and include opportunities to play and sit and rest. They also include high-quality hard surfaces, trees and linear 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 detailed landscaping would ensure attractive, uncluttered and inclusive spaces that would be safe to use by all. The inclusion of a free drinking water fountain in the proposed park would help ensure this space is attractive to use, but this and other details would be capable of being secured by planning condition.

6.5.35 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 obligations to secure the subsequent approval of an Open Space Management and Access Plan to secure public access and appropriate management and maintenance arrangements. It would also be appropriate to agree the implementation of an approved specific management plan with Brook House Primary School to secure appropriate management and maintenance of the proposed dual-use Brook House Yard space as per the extant consent for the Depot.

6.5.36 The applicant's DAS sets out proposals for a number of permanent and interim boundary treatments for different boundaries around the site, to help ensure satisfactory security, safety, amenity and appearance. This includes interim treatments that would need to be in place until such times as adjoining areas of Site Allocation NT5 were developed. These are considered acceptable in principle. It would be possible to reserve approval of the detailed design and implementation of these various treatments by way of planning condition.

Building Scale, Form and Massing

6.5.37 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).

6.5.38 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 Framework proposes that future tall buildings will generally be in well-defined clusters in identified urban growth centres.

6.5.39 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 residential towers.

- 6.5.40 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 Area Action Plan 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 CABI/English Heritage "Guidance on Tall Buildings" (2007 since superseded in 2015).
- 6.5.41 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 (with Figure 2.1 confirming that the site does not directly interact with any locally significant views and vistas). An urban design analysis is required to be submitted with applications for tall buildings assessing the proposal in relation to the surrounding context.
- 6.5.42 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.
- 6.5.43 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 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 below, alongside the approved heights in the extant consents and the indicative HRWMF heights.

Table 13: Proposed and consented building heights

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

Proposed		Fall back Position – Extant Consented Appeal Scheme (HGY/2021/1771)		Fall-back Position – Extant Consented Schemes		
New Block	Heights ('full' details)	New Block	Heights ('full' details)	New Block	Heights ('Full' details & 'Outline' maximums)	HRWMF Indicative heights
C	6-storeys (34.33m AOD)	C	6-storeys (34.33m AOD)	B3	3-storey (33m AOD)	2-3 & 5-8-storeys
D	6-storeys (34.33m AOD)	D	6-storeys (34.33m AOD)	C4	5-storey (34m AOD)	3-5-storeys
E	7-storeys (37.63m AOD)	E	7-storeys (37.63m AOD)	C3	5-storey (34m AOD)	3-5-storeys
F	4 to 7-storeys (28.33 to 36.43m AOD)	F	4 to 7-storeys (28.33 to 36.43m AOD)	C3/D1/ D2	Part 5/4/3-storeys (34/28.55/25.55m AOD)	3-5-storeys
G	4 to 5-storeys (32.72m to 39.64m AOD)	G	4 to 5-storeys (32.72m to 39.64m AOD)	E1	5-storey (31.5m AOD)	3-5-storeys
H	3-storeys (24.23m AOD)	H	3-storeys (24.23m AOD)	F1/F2	2-storey (20.15/22.75m AOD)	3-5-storeys
The Depot						
A	23 to 29-storeys (84.60 to 104.00m AOD)	A	23 to 29-storeys (84.60 to 104.00m AOD)	B	29-storeys (106m AOD)	10-18-storeys

B	9-storeys (42.60m AOD)	B	9-storeys (42.60m AOD)	A2	3 to 9-storeys (22m to 43m AOD)	5-8-storeys
C	5-storeys (32.50m AOD)	C	5-storeys (32.50m AOD)	C	Part 1, 7 & 9-storeys (19/37/43m AOD)	5-8-storeys
D	Part 5 to 6- storeys (32.70m AOD)	D	Part 5 to 6-storeys (32.70m AOD)	D	Part 5 to 6-storeys (29.65m to 32.70m AOD)	5-8-storeys
E	4 to 6- storeys (26.70 to 32.60m AOD)	E	4 to 6-storeys (26.70 to 32.60m AOD)	E	Part 1, 4 & 6-storeys (19/28/34m AOD)	5-8-storeys
G	3 to 6- storeys (24.71 to 35.19m AOD)	G	3 to 6-storeys (24.71 to 35.19m AOD)	G	Part 3/4/5 & 6- storeys (24.70m/27.36m/30. 25m AOD)	3-5 & 5-8- storeys

6.5.44 The proposed scheme accords with the HRWMF principles of tall buildings being located next to the railway. Whilst the proposed tall buildings would be significantly taller than envisaged and would not reduce in height as much or as quickly towards the White Hart Lane, this has been accepted in the appeal consent and was considered to generally accord with guidance in the HRWMF.

Proposed Tall Buildings

6.5.45 Based on the Local Plan definition, officers consider that just the proposed three towers (GY Blocks A and B and Depot Block A) would constitute ‘tall buildings.’

6.5.46 The application scheme proposes buildings of the same height as the allowed appeal scheme (reference HGY/2021/1771) but taller than those approved in the extant consents for the Goods Yard (HGY/2018/0187) and Depot (HGY/2019/2929) (this application proposes 27, 32 and 29-storeys south to north along the western edge of the site, as opposed to the approved 18, 21 and 29-storeys in the extant Depot/ Goods Yard hybrid consents). They would also be in broadly the same locations as approved in the appeal scheme HGY/2021/1771 and HGY/2019/2929) and largely the same architectural design.

6.5.47 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 a 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.

6.5.48 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.

6.5.49 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.

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.

The proposed towers relate well with the street and the lower buildings that they would spring from.

(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.

The proposed towers form a spine of buildings along the western edge of the site (in general accordance with the HRWMF, although they are significantly taller than anticipated) and this spine would be extended further south around White Hart Lane Station as and when wider proposals for Site Allocation NT5 come forward. The towers would be aligned with east-west routes to and from the High Road that are expected to come forward across as part of these wider proposals.

(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.

The architectural expression is considered to be acceptable. The faceted design, terracotta jacket and light grey cores and tops together with the fenestration and balcony pattern provides high levels of articulation, with a vertical emphasis, which successfully breaks up the massing and provides visual interest for the proposed towers. The Appeal Inspector and associated assessor for application HGY/2021/3175 found “*the proposed buildings would have highly articulated facades with a range of materials, textures, colours, tones and layers of depth that would be set out in well-proportioned bays that would result in an exemplary standard of architectural quality*”. High quality materials will be secured by planning condition.

(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.

The proposed buildings by virtue of their scale would depart from the character of the area. However, will form part of an emerging character area on an allocated site. The potential impacts on above ground heritage assets is addressed under Heritage Conservation below. In summary, officers consider that the proposed tall buildings would cause ‘less than substantial harm’ to a number of heritage assets, but that this would be outweighed by the public benefits that the scheme would provide.

(g) buildings should not cause adverse reflected glare.

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.

Light Pollution was scoped out at the informal 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

6.5.50 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 to ensuring compliance with the Fire Strategy in the submitted Fire Statement (which could be secured by a planning 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.*

Vehicular servicing is discussed under Transportation & Parking below and is considered acceptable subject to a Delivery and Servicing Plan (which could be reserved by planning condition). The applicant's DAS summarises the proposed cleaning and maintenance strategy and this is also considered acceptable. The applicant's Affordable Housing Statement makes it clear that the proposed scheme has been designed to ensure that estate service charges are as affordable as possible, whilst allowing all residents the right to access on-site amenities. Affordable housing would be managed by a Registered Provider. If planning permission were granted, it would be appropriate to use s106 planning obligations to clarify access to facilities, rents and service charges.

- *(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.*

The proposed tall buildings would be accessed from generously sized double height lobby areas directly from the proposed Embankment and Peacock Lanes. The entrances are framed in feature cladding and brickwork, which is considered acceptable.

- *(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.*

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.*
- The proposed ground floor commercial units and associated economic activity/job opportunities have been clustered around the proposed southern and northern squares and Embankment Lane and would have a satisfactory relationship with the proposed tall buildings. 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.*

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. It would be possible to use s106 planning obligations to ensure ultrafast broadband connectivity is designed in to the development, ensuring high-quality digital connectivity for new residents (without the need for external dishes/antenna). Proposed roof-top PV arrays are addressed under Energy, Climate Change & Sustainability below and are considered acceptable (there are no existing PV arrays on buildings in the Cannon Road area to the north that would be adversely affected).

6.5.51 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.*

These issues are addressed under Residential Quality below. In summary, officers consider that the proposed towers would result in 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.*

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.*

Potential noise and vibration impacts are addressed under Residential Quality and Neighbour Amenity below and are considered to be acceptable, subject to approval of glazing details (which could be reserved by planning condition).

6.5.52 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.

6.5.53 The ES and associated addendum reports on an assessment of 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). The Townscape and Visual Impact Assessment (TVIA) (that forms part of the ES) takes account of subsequent permissions, the application scheme, the Lendlease scheme and the Printworks application scheme. It also takes account of the masterplan and massing guidance in the HRWMF for the rest of Site Allocation NT5 - as modified by the masterplan set out in the applicant’s DAS and DAS Addendum.

6.5.54 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.*

The Council has not prepared such an SPD (the former Supplementary Planning Guidance 1c on Strategic Views was withdrawn in July 2014).

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

The proposed tall buildings would essentially be in a line approx. 30-35m apart and there should be no canyon effect in a north-south direction. Looking east-west, the proposed Goods Yard Block A would rise from a lower building fronting Embankment Lane and proposed Goods Yard Block B would be set behind the 6-storey Blocks C and D that would front Embankment Lane, which would be between approx. 15 - 16m wide at this point. Given this, officers do not consider that there would be a canyon-like arrangement in either in the existing condition with Peacock Industrial Estate in place or, taking account of

guidance in the HRWMF, as and when the Estate comes forward for development.

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

Given the proposed form of the towers, this is a particular issue looking when viewing the towers from the north or south. However, the location, of the proposed tall buildings mean that incidences of coalesce would be limited. The applicant's DAS includes an assessment which demonstrates that there would be no overlap of the proposed towers for 58% of directions around the site, with 2 x towers overlapping in 19.5% of locations (north-west, north-east, south-west and south-east) and 3 x towers overlapping in 22.5% of locations (north-east and south-west). Where overlapping does occur, officers consider that the proposed different detailed design and colour tones of each tower should 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 nor 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 would be some coalescence in some views from Bruce Castle Park).

- *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.*

The submitted DAS and DAS Addendum do this and officers have taken account this assessment when considering the proposals;

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

3D modeling was used in the assessment of the appeal scheme. .

Townscape and Visual Effects

6.5.55 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.

- 6.5.56 The Townscape and Visual Impact Assessment (TVIA) 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, including parts of Enfield to the north). 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 31 representative views (from 29 viewpoints plus 2 night-time variations) in the surrounding area, including beyond the 1km study area, that were agreed with officers. In addition, the TVIA also draws on 14 additional non-verified views. A TVIA Addendum includes updated rendered AVRs for 4 views (6, 12, 24 and 27) to show the proposed revised tower architecture.
- 6.5.57 The site does not fall within any Strategic Views identified in the Mayor's LVMF. It 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) – which is tested by View 1. 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 Depot Block A).
- 6.5.58 The ES identifies three Character Areas (based on Haringey and Enfield characterisation studies, land use/built form/layout/vegetation and conservation area boundaries). These are: (1) North Tottenham/Angel Edmonton; (2) High Road/Fore Street and (3) Bruce Castle/Tottenham Cemetery. The ES concludes that the permanent residual effect on Character Areas 1 and 2 would be 'Moderate Beneficial' and therefore significant, whereas for Character Area 3 the permanent residual effect would be 'Minor Beneficial.' However, officers are not convinced that the proposed towers would, in all cases, have significant beneficial effects. This is particularly the case where these Character Areas relate to Conservation Areas and other heritage assets, as discussed below.
- 6.5.59 The ES concludes that the permanent effect of the proposed scheme on the majority of the 29 visual receptors (viewpoints) would be beneficial, with only five views being identified as likely to experience a neutral or balanced effect. These are views from the High Road, north of Lampden Lane and north of Brettenham Road (Views 2 and 8); views from the footpath within the Tottenham Cemetery (Views 18 and 19); and View 15 from Tottenham Marshes. In terms of cumulative effects, four views were found to be neutral or balanced (Views 2, 8, 15, and 19) and no adverse cumulative effects were identified.

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

Table 14: ES Summary of effects on Visual Receptors (verified views)

Visual Receptors- Verified views	Residual permanent effect	Cumulative permanent effect
View 1 –High Road at High Cross Monument	No change	No change
View 2 – High Road, north of Hampden Lane	Minor; Neutral	Minor; Neutral
View 3 – High Road at Park Lane	Minor; Beneficial	No change
View 4 – High Road, near Whitehall Street	Moderate; Beneficial	Moderate; Beneficial
View 5 – High Road, next to Percy House	Moderate; Beneficial	Moderate; Beneficial
View 5N – High Road, next to Percy House (night-time)	Minor; Beneficial	N/A
View 6 - Northumberland Park, east of High Road	Major; Beneficial	Major; Beneficial
View 7 - Northumberland Park, at No.70B	Minor; Beneficial	Minor; Beneficial
View 8 – High Road, north of Brettenham Road	Minor; Neutral	Minor; Neutral
View 9 – Eastern pavement of the Fore Street (near no.76-82 Fore Street) Looking south-west	Minor; Beneficial	Minor; Beneficial
View 10 – Eastern pavement of the High Road (near Stellar House) looking south- west to No.867-879 High Road	Moderate; Beneficial	Moderate; Beneficial
View 11 – High Road at Brantwood Road	Moderate; Beneficial	Moderate; Beneficial
View 12 – Northern pavement of Brantwood Road taking in Nos.867-879 High Road	Moderate; Beneficial	No cumulative effect
View 13 – Brantwood Road by Grange Road, centre island	Moderate; Beneficial	Moderate; Beneficial
View 14 – Eastern pavement of Dyson Road at its junction with Middleham Road, looking west	Minor; Beneficial	No cumulative effect

Visual Receptors- Verified views	Residual permanent effect	Cumulative permanent effect
View 15 – Footpath within Tottenham Marshes	Negligible; Neutral	Negligible; Neutral
View 16 – Bruce Castle Park	Moderate; Beneficial	Moderate; Beneficial
View 17 – Tottenham Cemetery south entrance off Church Road	No change	No change
View 18 – Footpath within Tottenham Cemetery, looking north-east	Minor; Balanced	No cumulative effect
View 19 – Tottenham Cemetery, north-east path	Minor; Balanced	Minor; Balanced
View 20 – Tottenham Cemetery	Minor; Beneficial	No cumulative effect
View 21 – White Hart Lane, opposite No.302	Minor; Beneficial	No cumulative effect
View 22 – Beaufoy Road	Minor; Beneficial	Minor; Beneficial
View 23 – White Hart Lane at Beaufoy Road	Major; Beneficial	No cumulative effect
View 23N - White Hart Lane at Beaufoy Road (night-time)	Minor; Beneficial	N/A
View 24 – Western pavement of Love Lane, outside White Hart Lane Train Station, looking north	Major; Beneficial	No cumulative effect
View 25 – William Street, by White Hart Lane	Major; Beneficial	Major; Beneficial
View 26 – White Hart Lane at Selby Road	Minor; Beneficial	Minor; Beneficial
View 27 – Durban Road	Moderate; Beneficial	No cumulative effect
View 28 – Pretoria Road and Commercial Road junction	Major; Beneficial	No cumulative effect
View 29 – Northern pavement of Bridport Road at its junction with Pretoria Road, looking south	Minor; Beneficial	No cumulative effect

6.5.61 Officers generally agree with the assessment in the ES. However, they do not consider that the beneficial effects on those views highlighted in Table 14 above would be as great as identified in the ES TVIA.

6.5.62 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, 2, 3, 8, 9, 14, 15, 16, 17, 18, 19, 20, 21, and 29;
- Medium/mid – Views 4, 5, 5N, 6, 7, 10, 12, 13, 17, 22, 23, 23N, 26, and 27; and
- Close/Immediate – Views 11, 24, 25 and 28.

6.5.63 Long-distance views. London Plan Policy D9 calls for 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.

6.5.64 Officers consider that the application scheme would read well in long- distance views and provide positive additions to the skyline when viewed with the existing River Apartments. The proposed ceramic jackets enveloping the grey cores create a slender profile within the building. The colour of the ceramic cladding draws on prevalent brick tones in the locality. The grey tops help blend the height with the skyline. The regularity of the fenestration and balcony placement emphasise verticality. They will also contribute positively to wayfinding in the wider area.

6.5.65 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.

6.5.66 Likewise, officers consider that the application scheme as revised would read well in mid-range views, with the verified views in the TVIA demonstrating that the proposed proportions and materiality would be acceptable when seen from locations up and down the High Road and residential streets to the east and from Durban Road and other residential streets to the west. The proposed towers would also form terminations of medium-distance views from The High Road down planned east-west streets across the High Road West site and in their illustrative masterplan, from Brunswick Square, Percival Court and across the timber yard.

6.5.67 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.

6.5.68 The proposed towers, with their rich detailing, use of terracotta tiles and accentuated entrance points, would be most characterful in close/immediate views. Officers consider that the application scheme would have a good relationship with the proposed lower buildings and Embankment Lane on the site and from locations on the High Road, White Hart Lane, William Street (to the south of White Hart Lane), River Apartment and Pretoria Road.

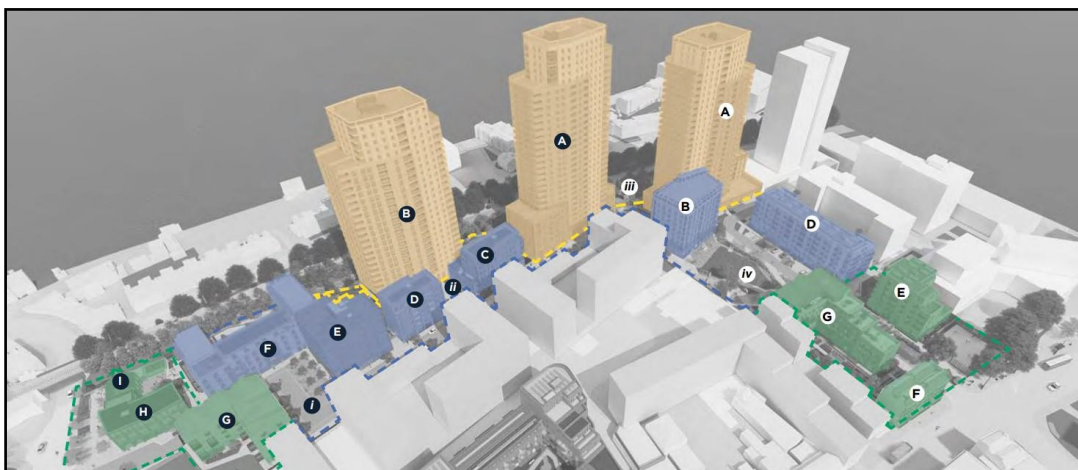
6.5.69 An assessment of the likely effects of the proposed scheme on neighbour amenity is set out below.

6.5.70 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

6.5.71 As summarised in Table 13 above, the proposed lower buildings range in height between 3 and 9-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 Embankment Lane and Peacock Park. All of these would provide contextual buildings for the proposed tall buildings (shown in brown). Images of proposed Goods Yard Block F are set out in **Appendix 1** as an example of a lower building.

Figure 04: The proposed lower buildings



6.5.72 The Depot part of the site. Starting from the High Road and working back in to the site, the proposed buildings can be briefly summarised as follows:

- Block F - Existing 2-storey Listed Buildings at Nos. 867-869, which would be converted in to 6 x 2-bedroom flats. The proposed refurbishment/alteration works benefit from an extant Listed Building Consent;
- Block G - This is identical to what was approved by the extant planning permission (HGY/2018/0187). It would be a part 3, 4, 5 and 6-storey varied brick-clad building, framing the proposed Pickford Yard Gardens to the rear. A commercial unit fronts Peacock Park, service, cycle storage and residential uses occupy the ground floor with residential with associated balconies and terraces above;
- Block E – 6-storey residential building, simply designed and detailed brick building with external balconies on three of its corners, relating carefully to the proposed Brook House Yard open space;
- Block D - This is identical to what was approved by the extant planning permission (HGY/2018/0187). The block would be a six-storey light-coloured brick clad building with a terrace at first floor level backing on to the existing Mallory Court. Parking, bin storage and cycle parking is proposed at ground floor level with ground/ first floor duplexes to the front and residential flats with balconies above.
- Block B – 9-storey block which would form a southern wing of the co-joined Block ABC, with the tall building Block A rising up from it. This block would have inset balconies and a roof top terrace; and
- Block C – 3-storey northern wing of the co-joined Block ABC, this would be next to the existing River Apartments building and have a roof-top terrace.

6.5.73 The Goods Yard part of the site. Starting from White Hart Lane and working back in to the site, the proposed buildings can be briefly summarised as follows:

- Block I - Proposed conversion and extension of the Station Master's House. The proposal here is different from that which was approved in 'outline' by the extant planning permission for the Goods Yard (HGY/2018/0187). The extant permission allows for a rear single-storey extension (approx. 65sqm) to provide space for future kitchen and bar facilities as part of its change of use to a restaurant. This 'full' application scheme proposes a smaller rear single-storey flat-roofed extension (approx. 49sqm), a separate small refuse storage building and alterations to the building's elevations to provide a dining space as part of the change of proposed use of the building to flexible 'Class E' use

- Block H - Part 2/part 3-storey, commercial, 'L' shaped mid-grey brick building, with red brick detailing around windows and arched ground floor windows to
- Block G – Part 4/part 5-storey mixed-use (commercial and residential) 'L' shaped building, with echoes of a Victorian factory/warehouse. It would be a single mixed buff/yellow brick blend building with strong projecting balconies and a pitched roof. At ground floor level is commercial units, bin storage and cycle storage with residential flats with balconies above;
- Block F – Part 4/Part 5/Part 6 courtyard building in contrasting brick, with prominent external balconies and a bronze coloured upper-storey – this would step up from the two White Hart Lane frontage buildings (Blocks H and I). The building includes commercial, residential and servicing uses at ground floor level with residential uses above.
- Block E – 7-storey, mixed use commercial and residential, lightweight frame building, including expressed external columns and expressed floor plates with a bronze coloured metal finish. The building has commercial floorspace and service rooms at ground floor level with residential flats above.
- Blocks C and D – A pair of 6-storey residential buildings either side of the proposed pocket square and entrance to the 27-storey Block B. These would be flat-roofed, simple red brick buildings that would help provide a 'plinth' along Embankment Lane to the tall buildings beyond.

6.5.74 Overall, officers are satisfied that the proposed lower buildings represent a family of different predominantly brick and fairly 'calm' buildings that relate well with the heritage buildings and spaces on the High Road and White Hart Lane and provide a foil for the proposed dramatic tall buildings.

Inclusive Design

6.5.75 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.

6.5.76 The applicant's DAS explains how the proposed scheme has been 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 are 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. As discussed under Transportation and Parking below, car

parking provision would be focused on the needs of wheelchair users 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 the proposed scheme would be accessible and inclusive. The particular requirements in relation to wheelchair accessible housing are discussed under Residential Quality below.

6.5.77 *Secured by Design* 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.

6.5.78 As discussed above, the proposed layout incorporates a good front to back relationship and includes active ground floor frontages 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, are also considered acceptable. The proposed Goods Yard Walk and podium and roof top private communal amenity spaces have been suitably designed to safeguard safety and security.

6.5.79 The applicant's DAS sets out a number of detailed access features and gates that are intended to be incorporated into the scheme. If planning permission were to be granted, it would be possible to use 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 proposed dual use Brook House Yard open space.

Development Design – Summary

6.5.80 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 placemaking and design for Site Allocation NT5.

6.5.81 Officers consider that the proposed scheme is a well thought through and elegantly designed response to a significant site. The proposed masterplan and layout represent an improvement on the existing adopted masterplan, with a clear, legible street network and an enlarged park, and improvements on the approved hybrid schemes for each of the individual Goods Yard and Depot sites and the scheme allowed at appeal. The proposed street layout is particularly improved on the Goods Yard site, where the single sided street proposed in both adopted masterplan and previous approval to run alongside the railway edge is moved into the site, with a more legible, direct and welcoming entrance off White Hart Lane and the potential for active frontage along both sides. Streets within the proposed development would generally be lined with good quality, well-designed low and medium rise mansion blocks providing an appropriate transition from the retained existing buildings along the High Road and White

- 6.5.82 Set out above is a detailed assessment of the proposed tall buildings against London Plan Policy D9, Local Plan Policies SP11, AAP6 and DM6 and the HRWMF. Officers consider that, overall, the proposed mix of heights (including three tall building at 27, 32 and 29 storeys) is successfully justified in accordance with this policy and guidance. In particular, whilst they are taller than the indicative heights in the HRWMF, the detailed design of the three proposed towers are legible and sculpturally interesting in longer views, connect well to the ground and their entrances whilst having clear separate base, middle and top and enclose good quality homes. 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, be in accordance with the previously approved masterplan.
- 6.5.83 The proposed public realm, including the proposed Peacock Park, and detailed landscaping to ground, podium and roof levels would be suitably high-quality and acceptable. The proposed layout, distribution of uses and design would provide an accessible, safe and secure environment for future residents and the general public and the proposed permanent and interim boundary treatments are also considered acceptable. It is recommended that s106 planning obligations secure public access to the proposed publicly accessible spaces, access in use for future developments on neighbouring sites, and ensure that management and maintenance of streets and publicly accessible spaces is in accordance with the Mayor of London's Public London Charter (October 2021). It is also recommended that that landscaping details are reserved by way of planning conditions.
- 6.5.84 Fall-back Position. Compared with the two extant consents (HGY/2018/0187 and HGY/2019/2929) for the site, the proposed scheme would:
- Layout - Locate the proposed north-south street (Embankment Lane) away from the western boundary and include a private communal green space (Goods Yard Walk) next to the railway. Officers consider this to be a significant improvement on the approved layout, allowing, as it does for a two-sided street;
 - Layout & location of proposed towers - Change the location of the proposed three tall buildings along the western edge of the site (including moving the southern-most building further away from The Grange, approx. 100m as opposed to approx. 89m, and the northern-most building closer to the existing Riverside Apartments, between approx. 30 and 35m as opposed to approx. 51.4m);

- Layout & location of proposed towers – Proposed location of Depot Block ABC would result in a different potential pedestrian bridge landing point – ruling-out a direct east-west alignment between Brantwood Road and Durban Road;
- Relationship with existing & future development – Have a similar relationship with most of Cannon Road, although a different/closer relationship with River Apartments and a different/better relationship with Peacock Industrial Estate/future development Plots;
- Amount, location & type of open space - Provide additional open space (15,650sqm compared with 11,180sqm, approx. 18.1sqm per home compared with approx. 17.3sqm per home, with the proposed Peacock Park being 300sqm larger than the illustrative scheme in the approved Depot consent);
- Public Realm, Landscape & Boundary Treatments – Provide similar sunlight conditions for the proposed Peacock Park and public realm management arrangements;
- Tall buildings - Increase the height of the proposed tall buildings (south to north) from 18, 21 and 29-storeys to 27, 32 and 29-storeys. A change in the proportions of the proposed towers, making them slenderer in north-south views, but broader in east-west views. Detailed design (rather than in 'outline' only);
- Tall buildings - Result in less coalescence of the proposed towers – with no overlap for 65.5% of directions around the site (as opposed to 58% for the extant schemes), with 2 x towers overlapping in 17% of locations (north-west, north-east, south-west and south-east) (as opposed to 19.5% for the extant schemes) and 3 x towers overlapping in 17.5% of locations (north-east and south-west) (as opposed to 22.5% in the extant schemes);
- Townscape & Visual Effects – Be more prominent in some Close/immediate (including from River Apartments) Medium/mid and Long views. Officers consider that the proposed detailed designs represent a significant improvement on the indicative designs for the towers that were approved in 'outline' in the Goods Yard and Depot consents; and
- Inclusive Design & Secured by Design – Provide similarly good quality design, with a proportionate increase in the number of proposed 'wheelchair accessible homes' (87 as opposed to 65 in the combined extant schemes).

6.5.85 Fall-back Position: Compared to the existing consent for the site (HGY/2021/1771)

- Layout and location of towers
- Relationship with existing and proposed development
- Location, amount and type of open space
- Tall buildings
- Townscape and visual effects
- Inclusive Design and Secured by design

6.5.86 Officers support the different layout to what has been approved previously and consider that the proposed increase in height and scale of the proposed tall buildings is acceptable. In addition, the proposed lower buildings are similar in

6.6 Residential Quality

- 6.6.1 London Plan Policy D6 sets out housing quality, space, and amenity standards, with further detail guidance and standards provided in the Mayor's Housing SPG. Strategic Policy SP2 and Policy DM12 reinforce this approach at the local level.
- 6.6.2 The majority of proposed homes would be single level flats. However, a number of independently accessed duplex/maisonettes would be included on the ground and first floors of blocks fronting the proposed streets and squares to maximise 'doors on the street', introduce variety and increase housing choice.

Accessible Housing

- 6.6.3 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.
- 6.6.4 The proposed scheme includes 10% of homes designed to meet Building Regulation M4 (3) ('Wheelchair User Dwellings'). These proposed homes are distributed across tenures and dwelling sizes as set out in Table 15 below.

Table 15: Proposed Wheelchair User Dwellings by tenure and size

	1-bed	2-bed	3-bed	4-bed	Total
Market	4	34	14	0	52 (10%)
Low-Cost Rent	4	4	3	0	11 (10%)
Intermediate	7	13	4	0	24 (11%)
	15	50	21	0	87 (10%)

- 6.6.5 The proposed wheelchair accessible dwellings are also distributed physically across the site in a variety of building types and levels, offering good choice for potential purchasers/renters. All three proposed towers would include 3 x lifts. Overall, the majority of accessible homes on upper floors would be served by two or more lifts, in line with good practice, with direct access to ground floor or basement car parking. Proposed emergency evacuation provision is addressed under Fire Safety & Security below (and is considered acceptable).
- 6.6.6 In order to demonstrate that provision of up to 10% accessible car parking spaces in line with London Plan Policy T6.1, the proposed basement areas for GY Blocks A, B, C and F and Depot Blocks ABC would include 86 accessible spaces. Depot Block D would also include four accessible car parking spaces at ground level. If planning permission were granted, it would be appropriate to ensure that a Car Parking Management Plan prioritises and manages access to these proposed spaces.

- 6.6.7 All of the proposed homes would meet the minimum internal space and floor to ceiling heights (2.5m) standards called for in London Plan Policy D6. Proposed layouts are generally good, although some rooms on the ground floor of the GY Blocks facing the railway are rather deep and respond to the challenges posed by railway noise and potential overheating – including ventilation panels to facilitate comfort without noise nuisance. The number of homes per core would be no more than 8, in line with adopted and emerging Mayoral guidance.
- 6.6.8 All flats would have private amenity space in the form of private balconies/terraces or patio spaces. In addition, most homes would also have direct access to communal open space, in the form of ground floor courtyards, podium level gardens, roof top and (for the proposed western Goods Yard Blocks, the proposed Goods Yard Walk).

Unit Aspect, outlook and privacy

- 6.6.9 Most of the proposed homes (54%) would be at least dual aspect. The majority of single aspect homes would be east and west facing, with no north facing. There would be a small number (22) of south-facing homes, but these have been designed to avoid overheating (see Energy, Climate Change & Sustainability). A number of proposed single aspect homes (including Market, Low Cost Rent and Intermediate tenures) at lower levels would face the railways lines, which is not ideal. However, none of these would be family-sized units and they would all have an acceptable outlook, daylight and internal noise environment (as discussed below).
- 6.6.10 The proposed disposition of blocks and layout and design of the proposed homes and outdoor spaces means that all proposed homes would have an acceptable outlook and there should be no unacceptable overlooking. The proposed homes at ground and podium level would all have a 1-2m threshold space between residential windows and the public realm/communal open space.

Daylight/Sunlight/overshadowing – Future Occupiers

- 6.6.11 The NPPF (paragraph 125c) sets out that that daylight/sunlight guidance should be interpreted flexibly where they would otherwise inhibit making efficient use of a site, as long as the resulting scheme would provide acceptable living standards.
- 6.6.12 The applicant's Daylight and Sunlight Report (May 2023) reports on 123 dwellings and there 401 habitable rooms, including all proposed homes on the lowest two residential floor levels of each of the proposed Blocks with an additional floor level, comprising 61 dwellings, assessed for the proposed tower Blocks (Depot ABC and Goods Yard A and B). This includes a range of dwelling and room types and is considered to represent the properties and habitable rooms that would likely receive the lowest levels of natural light in the development.
- 6.6.13 The 2011 BRE guidance has been replaced by the 2022 guidance, resulting in

the omission of the average daylight factor test and the introduction of an illuminance test that requires minimum target lux levels to be achieved for at least 50% of the habitable room being tested. The is a higher target to hit than the 2011 guidance average daylight factor test. Previous applications on the site have been considered under the 2011 BRE guidance.

- 6.6.14 The report shows that 192/401 habitable rooms assessed (48%) would satisfy the daylight illuminance test (at least 50% of the Kitchen/Living/Dinning Rooms achieving at least 200 lux) and 211/401 (52%) would satisfy the lower target test (KLD receiving at least 150 lux for at least 50% of the room). The results were extrapolated, in the assessment, to give a representative sample of low level and high level habitable rooms in the development. This found that 438/680 KLD (68%) would meet the BRE target illuminance and 486/680 (71%) would meet the lower target illuminance level. BRE guidance was updated in 2022, omitting the average daylight factor test.
- 6.6.15 In terms of sunlight, 103/123 flats tested had at least 1 habitable room that received at least 1.5 hours of sunlight on the 21st of March.
- 6.6.16 Given the proposal is for dense mixed used development, on an allocated site, in an urban area, it is considered that the proposed daylight/ sunlight levels to habitable rooms offer an acceptable living environment for future occupants.
- 6.6.17 The applicant's assessment also tested likely Sun on Ground for the proposed communal podium level amenity spaces against the BRE guidelines that spaces should receive 2 hours sun over at least 50% of the area on March 21. This found that 7 of the 8 above ground amenity spaces would meet the BRE guidelines. The exception being the proposed terrace on the north side of proposed Block D for the Depot part of the site (which is overshadowed by the proposed building), where the figure would be 0%. It should be noted that the scale of proposed Block D is the same as Block D that was approved in September 2020 (HGY2019/2929) and the overshadowing of its proposed amenity space has been considered acceptable.

Wind and microclimate – Future Occupiers

- 6.6.18 This issue is addressed under the Wind and Microclimate heading below. In summary, subject to ensuring that all necessary mitigation measures are incorporated into the proposed scheme and that landscaping is managed and maintained, the likely resultant wind environment for future residents is considered acceptable.

Noise and vibration – Future Occupiers

- 6.6.19 The western part of the site, where GY Blocks A, B, F and Station Master's House and Depot Blocks ABC would be located suffers from railway noise. The eastern and southern parts of the site, where GY Block H and the Station Master's House and Depot Blocks E and F would be located, suffers from traffic noise from the High Road/ White Hart Lane. Noise from the Peacock Industrial Estate and crowd/concert noise from the Tottenham Hotspur stadium is not

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expected to contribute to the overall noise climate of the proposed homes as this would be less than the ambient noise level associated with trains and road traffic.

- 6.6.20 The applicant's Noise Impact Assessment sets out sound insulation requirements to ensure that the internal noise environment of these Blocks meets the relevant standards and recommends that mechanical ventilation and enhanced glazing be installed for these blocks. The assessment also considers overheating and identifies the need for the inclusion of an acoustically attenuated façade louvre that could be opened or closed by occupiers on facades that are considered 'medium' or 'high' risk of overheating and these have been incorporated in to the proposed detailed design. It would be possible to secure further details of the proposed glazing, mechanical ventilation and louvres by way of a planning
- 6.6.21 It would be possible to control mechanical plant noise by way of a standard planning condition (calibrated 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

- 6.6.22 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 and overheating.
- 6.6.23 Fall-back Position. The consented and proposed schemes would provide high-quality housing, meeting London Plan indoor and outdoor standards and benefitting from acceptable aspect, outlook and privacy, sufficient daylight and sunlight and acceptable microclimate and internal noise and vibration environment.

Infrastructure

Policy Background

- 6.6.24 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.
- 6.6.25 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.

6.6.26 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 Area Action Plan 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.

6.6.27 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 2020) 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

6.6.28 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 7 day a week activity. The infrastructure requirements for the wider 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.

6.6.29 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. The Council expects the applicant to make a proportionate contribution to these costs.

6.6.30 The AAP is clear that the Council will monitor government and London-wide policy and changes in legislation to make sure that the AAP continues to be consistent with relevant national, regional and local planning policies, and identify the need to review or reassess the approach taken in the Plan. Since the IDP Update (2016) the cost of infrastructure has increased when considered against inflation and other appropriate pricing indices.

Proposed site-specific infrastructure provision

6.6.31 The ES (Chapter 7) and associated addendum reports on an assessment of the likely significant socio- economic effects of the proposed scheme, including primary and secondary school places and primary health care. This finds that the proposed scheme would have a Negligible effect on all of these forms of infrastructure, taking account of planned future provision and CIL payments. This is also the finding when considering the likely significant effects of the proposed scheme and the cumulative schemes.

6.6.32 Library, community space and highways/public realm. The need for and proposed provision of overall open space, public realm and publicly accessible open space is addressed under Development Design above. In summary, this finds that there would be a shortfall of publicly accessible open space provision.

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

6.6.34

6.6.35 School Places. The proposed scheme is estimated to result in approx. 137 x school-aged children (87 x primary and 50 x secondary). The site is immediately next to the two-form entry Brook House Primary School and is proposing to make available a games area (Brook House Yard) to the school during term times. The site is within School Place Planning Area 4 and the Council's School Place Planning Lead notes that given that the proposed development has been included within the annual development trajectory (which forms part of the Council's school roll projections) 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.

- 6.6.36 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.
- 6.6.37 Primary healthcare. The proposed scheme is estimated to result in the need for 1 x additional GP (based on 1,800 patients per GP). The partly implemented Northumberland Development Project scheme, one of the cumulative schemes, includes provision for a new health centre. The Lendlease proposals also include the provision of a healthcare centre in the event that the aforementioned centre is not delivered. The CCG have requested a financial contribution of £442,020 towards primary healthcare provision. However, in accordance with Haringey's Planning Obligations SPD and Annual Infrastructure Funding Statement, officers consider that the need for additional primary health care provision would be most appropriately addressed by considering the use of Strategic CIL at a later date. Subject to using CIL in this way, officers agree with the ES assessment that the proposed scheme would have a Negligible effect on school provision.
- 6.6.38 Sports provision. Sport England has encouraged the LPA to consider the sporting demands arising from the proposed schemes and to address these by either CIL or s106 financial contributions. 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 facility and that additional swimming pool capacity was not required. As such, officers consider that the sporting demands arising from the proposed scheme are best addressed by way of the proposed 'community space,' discussed above, and potentially through Strategic CIL (with the Annual Infrastructure Funding Statement explicitly identifying sports and leisure facilities as eligible).

Proposed site-specific infrastructure provision - Summary

6.6.39 Given the changed development context and the proposed in-kind provision of a park, officers consider that the proposed financial contributions towards a new library, community space and public realm are fairly and reasonably related in scale and kind to the proposed scheme. 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.

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

6.7 Child Play Space

6.7.1 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.

6.7.2 The ES (Chapter 7) 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 Moderate beneficial effect on play space at site level and a Negligible effect at all other spatial levels. When the proposed scheme is considered alongside the cumulative schemes, a Minor beneficial effect at local level and a negligible impact at other spatial levels is identified.

6.7.3 Using the GLA's Population Yield Calculator (v.3.2) (October 2019), the proposed scheme estimates an on-site child population of 261 (113 x 0-4-year olds, 87 x 5-11-year-olds and 61 x 12+ year-olds). This generates an overall need for 2,601sqm of play space. The GLA find the play space quantum proposed (2,900 sqm) to be in accordance with London Plan Policy S4.

Table 16: Play Space Requirements

Age Group	Requirement (sqm)	Provision (sqm)
0-4	1,133	1,300
5 to11	866	880
12+	602	720
	2,616	2,900

6.7.4 The proposed play space would be provided at ground and podium level as set out in Figure 05 below.

Figure 05: Ground and Podium Level Play Areas (Extracts from Design & Access Statement)



6.7.5 The space in the proposed Peacock Park, Northern Square and Brook House Yard, would be publicly accessible. Overall, officers consider that the proposed quantity and quality of play space is acceptable and agree with the finding of the ES that it would have a Moderate/Minor beneficial effect. If the proposed scheme were to be granted permission, it would be possible to reserve details of proposed play space by way of planning conditions.

6.7.6 The proposed Brook House Yard space (approx. 350sqm) for 12+ year-olds would be shared with Brook House Primary School, with it being used by the school Monday-Friday 08.00 to 17.00 during school term-time and it being available for wider use outside of these hours. Residential amenity would be safeguarded by the proposed detailed boundary treatment and timer controls for the proposed external lighting. Such a dual use was accepted in principle in relation to the extant permissions (HGY/2019/2929 & HGY/2021/1771), subject to a planning condition requiring the implementation of an approved management and maintenance plan. Officers recommend the imposition of a similar condition. The proposed layout, scale and massing and design of Block E has been designed to safeguard the wellbeing of children using the existing school playground and proposed shared play area.

6.7.7 Fall-back Position. The proposed scheme and the Goods Yard and Depot schemes approved by the extant consents would deliver similarly acceptable provision for children's play and meet relevant quantitative and qualitative standards.

6.8 Heritage Conservation

6.8.1 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.

6.8.2 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.

6.8.3 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.

6.8.4 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.

6.8.5 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.

- 6.8.6 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

- 6.8.7 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".
- 6.8.8 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."
- 6.8.9 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."
- 6.8.10 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.
- 6.8.11 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.

6.8.12 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.

6.8.13 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

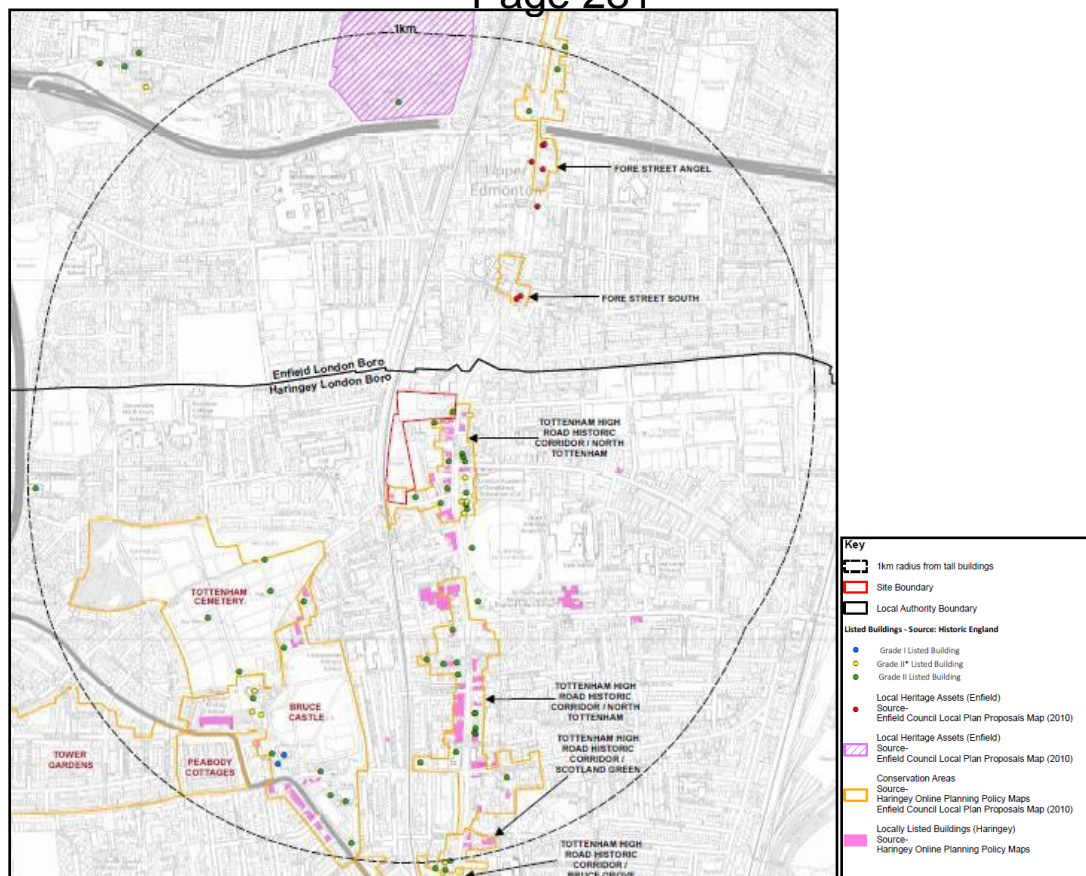
6.8.14 The Tottenham High Road Historic Corridor consists of a sequence of five conservation areas. The North Tottenham neighbourhood is at the northern end of the historic corridor; it is, therefore, a threshold or point of entry to the historic corridor as a whole. The whole North Tottenham Conservation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

6.8.15 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, other than the local listed Station Master's House (52 White Hart Lane), the Grade II Listed Buildings at Nos. 867-869 High Road and the nearby mature London Plane trees, 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. The existing 22/23 storey tall Rivers Apartments tower located immediately to the north of the site also forms part of this context.

6.8.16 The proposed scheme locates tall buildings close to the western edge of the site (away from the High Road) and GY Block B would be approx. 100m to the north- west of The Grange on White Hart Lane. As such, they would be set back from the North Tottenham Conservation Area frontages. However, they would form part of the immediate surroundings of designated and undesignated heritage assets included Sub Area A (northern part of the High Road between Brantwood Road and White Hart Lane) and Sub Area B (White Hart Lane) 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.

- 6.8.17 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 located to the north of the conservation area. This context can be expected to further change when other parts of Site Allocation NT5 are developed in accordance with the HRWMF, which aims to transform the poor quality industrial and commercial sites into a mixed-use commercial and residential areas complemented by high quality public spaces.
- 6.8.18 Following officer comments as part of the pre-application informal EIA scoping exercise, built heritage was scoped in for EIA purposes and Chapter 11 of the ES presents an assessment of the likely significant effects of the proposed scheme on built heritage. This draws on the images in the Townscape and Visual Impact Assessment (TVIA) and its Addendum and a separate Heritage Statement.
- 6.8.19 The ES assessment started with the identification of built heritage assets within a 1km search area of proposed tall residential towers (Goods Yard Blocks A and B and the Depot Block A). The 50 x Listed Buildings, 4 x Conservation Areas and non-designated heritage assets are identified in Figure 06 below.



6.8.20 Following desk-based research and site visits and taking account of the 'heritage significance' and sensitivity of the identified assets, the ES reports on an assessment of the likely significant effects on the following ones:

- 34 White Hart Lane (The Grange) (Grade II Listed);
- Nos 797-799 High Road (Grade II Listed); and
- Nos. 819-821 High Road (Grade II Listed);
- Nos. 867-869 High Road (Grade II Listed);
- North Tottenham Conservation Area;
- Bruce Castle and All Hallows Conservation Area
- Station Master's House (52 White Hart Lane) (Locally Listed);

6.8.21 Officers agree that the above built heritage assets are those worthy of assessment but also considers that, given the proposed height and form of the proposed towers and the comments in the Mayor of London Stage 1 Report, the following also need to be considered:

- Nos. 790 High Road (Dial House) (Grade II* Listed);

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

6.8.23 The Grange. The ES identifies that the presence of the tall proposed buildings behind The Grange would be harmful to its 'heritage significance' by reason of the sense of distraction due to their different bulk, scale and massing when compared to the modestly proportioned historic building. However, it goes on to

find that the Grange would still stand out as a striking Georgian building and there is unlikely to be any considerable effect on its significance and a low degree of harm is identified. The ES goes on to identify a positive effect of the knitting together of the street scene on White Hart Lane to bring a coherence and sense of enclosure and enhancement of the character and quality of the townscape immediately to the west and north of The Grange and to the street frontage, giving rise to a beneficial effect. The ES balances the enhancements to the setting of The Grange with the harm that would be caused by the proposed towers and concludes that there would be a Negligible effect.

6.8.24 Officers agree that the proposed sensitively designed and traditionally proportioned new building next to the Grange would result in an improvement in its immediate setting. However, they believe that the proposed tall towers would dominate in views of the listed building and would generate an overwhelmingly tall and uncharacteristic built context surrounding the listed building and the established scale of the historic town thus diminishing their primacy and legibility. The towers would have a negative impact on the wider setting of the Listed Building and would reduce the positive effects of retaining traditional built proportions along White Hart Lane. The harm that would be caused to its wider setting by the proposed towers would outweigh the positive effects derived by the improvement to the immediate setting of the building and that, overall, the proposals would cause 'less than substantial harm' to the setting and significance of this Listed Building.

6.8.25 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 Negligible effect.

6.8.26 The proposed Goods Yard towers (in particular) would be significantly taller and more prominent than the existing River Apartments tall building and draw attention away from it. Officers consider that they would have a negative effect on the setting of these Listed Buildings. As such, they consider that the proposal, would cause 'less than substantial harm' to the setting and significance of these Listed Buildings.

6.8.27 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-Negligible adverse effect on these buildings. The ES also reports on a cumulative assessment, taking account of the proposed scheme for the Printworks (HGY/2021/2283). It finds that if this scheme were to also go ahead, there would be a Minor- Adverse effect on these buildings.

6.8.28 Officers consider that (as demonstrated by View 6 in the TVIA), 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.

- 6.8.29 Nos. 867-869 High Road (Listed Grade II). The ES does not report on an assessment of proposed works to the building themselves that would enable their conversion to 6 x residential flats (which are assumed to be part of a future baseline). However, officers consider that the approved repair and conversion of these two Listed Georgian townhouses into residential use would enhance the character special architectural and historic interest and significance of these buildings. Officers also consider that proposed Depot Block G and the creation of a communal garden area (to be shared with residents of Nos. 867-869) would improve the immediate setting of the Listed Buildings.
- 6.8.30 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. 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.
- 6.8.31 Officers consider that (as demonstrated by Views 10, 11 and 12 in the TVIA), 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, distracting from their prominence in the streetscape. Overall it is considered that the enhancements to 867-869 and its immediate setting balance the harm associated with the distraction the tall towers provide in the wider setting of the building. In line with the Appeal Inspectors findings on application HGY/2021/3175, the proposal is not considered to harm the significance of no.867 – 869 High Road.
- 6.8.32 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 conversion and refurbishment of Nos 867-869, the improvement of the existing road junction and the creation of a new high-quality street (Peacock Lane) and adjoining fenced open space (Brook House Yard), together with the retention of the existing mature trees would enhance this part of the Conservation Area and have a positive effect.
- 6.8.33 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 and refurbishment 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

- 6.8.34 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 are well designed and articulated and 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 (much more so than the tall buildings approved as part of the extant Goods Yard permission). The ES concludes that the proposed tall buildings would have a Negligible effect on the Conservation Area.
- 6.8.35 Proposed tall buildings along the western edge of the site would be in line with the vision established by the HRWMF. However, the proposed towers would be significantly taller than the guidance envisages. Officers consider that, as demonstrated by TVIA Views 4, 5, 5N, 6, 10, 11, 12 and 25), 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.
- 6.8.36 Bruce Castle and All Hallows Conservation Area. This has considerable historic and architectural significance and includes three important historic buildings – Bruce Castel (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 effect.
- 6.8.37 Officers disagree with the assessment in the ES. Officers consider that the proposed Goods Yard towers (in particular), would be prominent features when viewed from the open spaces in the Conservation Area, which is characterized 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.
- 6.8.38 Station Master's House. The proposed scheme also includes the proposed conversion and extension of the Station Master's House. However, the proposal here is different from that which was approved in 'outline' by the extant planning permission for the Goods Yard (HGY/2018/0187). The extant permission allows for a rear single-storey extension (approx. 65sqm) to provide space for future kitchen and bar facilities as part of its change of use to a restaurant. This 'full' application scheme proposes a smaller rear single-storey extension, a separate small refuse storage building and alterations to the building's elevations to provide a dining space as part of the change of proposed use of the building to flexible 'Class E' use (with the drawings indicating a restaurant/café). As with the consented scheme, officers consider that the proposed scheme would have a beneficial effect on this non-designated heritage asset and allow for the reuse of this building. The LPA would be capable of reserving the approval of details of the proposed works by use of a planning condition.

6.8.39 The ES does not report on an assessment of proposed works to the building themselves (which are assumed to be part of a future baseline). However, it 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.

6.8.40 Officers agree with the assessment in the ES. The proposed works to the building would have a beneficial effect on the significance of this asset and help bring it back into beneficial use. In addition, whilst the proposed Goods Yard towers are significantly taller than those granted at appeal (HGY/2018/0187) as part of the extant consent, they would be set further to the north. Overall, officers consider that, on balance, the 'less than substantial harm' that would be caused to the setting of this building would be outweighed by the benefits associated with the proposed change of use and works to the building itself.

6.8.41 No. 790 High Road (Dial House) (Grade II* Listed). The ES does not provide an assessment of the impact of the proposed development on Dial House. Officers consider that the proposed Goods Yard towers (in particular), would be uncharacteristically tall features when viewed from this Grade II* Listed Building and adversely affect the setting of this important building. As such, officers consider that these proposed tall buildings would cause 'less than substantial harm' to its setting and significance.

6.8.42 Summary. Having carefully considered the proposals, including the findings in the applicant's ES and Heritage Statement, the Conservation Officer considers that the proposed towers would cause 'less than substantial harm' to the setting and significance of the following 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 average level of harm would be at the mid-low range of 'less than substantial':

- 34 White Hart Lane (The Grange) (Grade II Listed);
- Nos 797-799 High Road (Grade II Listed);
- Nos. 819-821 High Road (Grade II Listed);
- Nos. 867-869 High Road (Grade II Listed);
- North Tottenham Conservation Area;
- Nos. 790 High Road (Dial House) (Grade II* Listed); and

6.8.43 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.

6.8.44 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:

- Securing the future of the Listed Buildings at Nos. 867-869 High Road and improving their immediate setting;
- Securing the future of the locally listed Station Masters House and improves its immediate setting;

- Making a positive contribution towards the regeneration of Tottenham and acting as a catalyst for further regeneration and inward investment;
- Helping to deliver the HRWMF, including a positive contribution to place-making, provision of publicly accessible open space, new play space and public realm and the dual use of the proposed Brook House Yard amenity space with Brook House Primary School;
- Improving connectivity and permeability by providing new high-quality pedestrian and cycle routes and improving the streetscape of the High Road and White Hart Lane.
- Delivering 844 new high-quality homes, including affordable homes (between 35.9% and 40% by habitable room);
- Depending on phasing and timing, providing potential opportunities to decant existing residents from the Love Lane Estate to high-quality housing, to facilitate its regeneration as called for in Site Allocation NT5;
- Achieving ecological and biodiversity enhancements, including an overall net gain in biodiversity;
- Making a financial contribution towards social infrastructure;
- Making a positive contribution to reducing carbon dioxide emissions and surface water run-off;
- Creation of 270 FTE jobs during the construction phase with opportunities for local recruitment, skills development and sustainable careers.
- Creation of between 30 to 160 FTE new jobs (a net loss of between 30 and 160);
- Generation of a total New Homes Bonus of c. £1.7m alongside c. £1.5m a year in council tax revenue (of which nearly 75% would be retained by the LBH);
- Annual household spending of £12.7m on goods and services in the area; and
- Approx. £100,000 per year in business rates.

6.8.45 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. This is consistent with the findings of the Planning Inspector on the HGY/2021/1771 appeal.

Heritage Conclusion

6.8.46 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.

6.8.47 Officers are bound to consider this strong presumption in line with the legal context set out above. The proposed scheme would retain, preserve and enhance the heritage assets within the site – returning the Listed Buildings at Nos. 867-869 High Road to residential use and providing gardens to the rear, enhancing their immediate setting and the converting and restoring the Station Master's House). 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 and affordable housing and publicly accessible open space. Given this, officers conclude that, the proposals would preserve and enhance historic qualities 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.

6.8.48 Fall-back Position. The application scheme proposes significantly taller buildings on the Goods Yard part of the site than were approved as part of the Goods Yard extant consent (HGY/2018/0187), albeit these are of a different form and design (being in 'full' rather than in 'outline') and would be located further to the north (with proposed GY Block B being approx. 100m north west of the Grange, as opposed to 86.5m (based on the maximum footprint of the approved 'outline' parameter plans in the extant Goods Yard scheme) . The tall building proposed on the Depot part of the site is of a similar height, although again of a different form and design (being in 'full' rather than in 'outline') and would also be located further to the north.

6.8.49 Fall-back Position. HGY/2021/371

6.8.50 Taking account of these and all other differences between the application scheme and the extant consents (HGY/2018/0187, HGY/2019/2929 and HGY/2021/3175), officers consider that the application scheme would result in some additional harm (where none has been identified in relation to the extant consents) to the setting and significance of Nos. 819-821 High Road (Grade II Listed). In addition, officers consider that the application scheme would result in increased harm (over and above what has been identified in relation to the extant schemes) to the setting and significance of The Grange (Grade II Listed), Nos. 797-799 High Road and the North Tottenham Conservation Area.

6.8.51 However, whilst officers consider that the proposed scheme would result in some additional and increased harm, it would deliver the following additional public benefits over and above those identified for the extant Goods Yard and Depot schemes (HGY/2018/0187 and HGY/2019/2929):

- Providing an additional 221 homes – making a greater contribution to meeting Haringey's London Plan housing target;
- Delivering more family homes (148 or 17.4% compared to 79 or 12%);
- An additional 22 'wheelchair accessible' homes;
- 70 more affordable homes (+31%);
- 20 more Low-Cost Rent homes (+25%);
- 16 more Low-Cost Rent family homes (+49%) (with better alignment with the Council's Housing Strategy);
- Delivering a greater quantum of on-site open space (15,650sqm) compared to the extant consents (11,180sqm) resulting in 18.1sqm of open space per home as opposed to 17.3sqm - with the proposed Peacock Park being 300sqm larger than the illustrative scheme in the approved Depot consent;
- Providing a greener and more biodiversity rich scheme; and
- Proportionately delivering additional economic benefits, including further Council tax receipts, New Homes Bonus payments, additional expenditure from additional residents and further S106/CIL contributions.

- 6.8.52 Having given significant weight to the less than substantial harm identified above, officers consider that this would be outweighed by the likely additional public benefits identified above.

6.9 Impact on Amenity of Adjoining Occupiers

- 6.9.1 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

- 6.9.2 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.
- 6.9.3 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.

- 6.9.4 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.
- 6.9.5 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.
- 6.9.6 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.
- 6.9.7 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).
- 6.9.8 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.
- 6.9.9 Chapter 9 of the ES along with associated addendum reports on an assessment of the likely significant effects of the proposals on 103 neighbouring residential properties (1,619 windows serving 1,092 rooms – 990 rooms for sunlight) immediately to the north in the Cannon Road housing area, to the east and south on the High Road, to the south along White Hart Lane and to the west along Pretoria Road. It also assessed the likely impacts on Brook House Primary School immediately to the north. The ES also includes an assessment comparing the likely significant daylight and sunlight effects of the proposed development with those of the extant consented Goods Yard and Depot schemes and the Lendlease Scheme.

6.9.10 The ES makes the point that, uncommonly for an urban area, the site is largely clear of buildings – with the exceptions being the relatively low-rise supermarket building and small retail units, Nos 867-869 High Road, the Carbery Enterprise Park buildings and the Station Master's House. The BRE Guidelines acknowledges that standards need to be applied particularly flexibly in such situations and that alternative baseline and/or standards may be appropriate. Proposed Depot Block D is effectively a mirror image of the existing Mallory Court to the north – as advocated in the HRWMF. A “mirror massing” daylight assessment was carried out in relation to the extant Depot consent. However, as the position and massing of proposed Depot Block D has not changed, such an assessment was not repeated for the ES (although the principles remain the same).

Daylighting and Sunlight Assessment

6.9.11 The assessment reported in the ES finds that windows and rooms in 57 of the 103 buildings assessed would meet the VSC and NSL numerical guidelines set out in the BRE Guidelines and. As such, the ES identifies the likely effects to be Negligible and not significant. The situation for sunlight is similar, although in this case rooms in 54 of the 103 buildings assessed would meet the annual and winter APSH numerical guidelines.

6.9.12 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	Daylight (Adverse)	Sunlight (Adverse)
River Apartments	Minor	-
Ambrose Court	Moderate	Minor
Mallory Court	Major	Moderate to Major
Brook House Primary School	Minor to Moderate	-
Beachcroft House	Minor	Minor
2-7 Pretoria Rd	Minor	-
8-10 Pretoria Rd	Minor	-
11,12/15-17 Pretoria Rd	Minor	-
Lorenzo House	Moderate to Major	-
36 & 37 Pretoria Rd	Moderate	-
36,40,41 & 44 Pretoria Rd		Minor
38 & 39 Pretoria Rd	Moderate	Minor
40-45 Pretoria Rd	Moderate	-
46-48 Pretoria Rd	Moderate	Minor
49-51 Pretoria Rd	Moderate	-
49-55 & 57 Pretoria Rd		Minor

Receptor	Daylight (Adverse)	Sunlight (Adverse)
52-57 Pretoria Rd	Minor	-
55 Petoria Rd	-	Minor
58-67 Pretoria Rd	Minor	Minor
865 High Road	Minor	-
849 High Road	Minor	-
841-843 High Road	Minor	-
837 High Road	Minor	-
813-817 High Road		Minor
831-833 High Road	Minor	-
6-6a White Hart Lane	Minor	
30 White Hart Lane	Minor	

6.9.13 The ES reports that with the cumulative schemes also in place, the properties in Table 18 below would be likely to experience the following effects.

Table 18: Cumulative Daylight and Sunlight effects

Receptor	Daylight (Adverse)	Sunlight (Adverse)
Ambrose Court	Moderate	Minor
Lorenco House	Moderate - Major	
Mallory Court	Major	Moderate-Major
Beachcroft Court	-	Minor
2-8 Collage Road, 4 Collage Park Road and 1 & 17 Durban Road	Negligible -Minor	-
1-12, 15-17 & 57-67 Pretoria Road	Minor	-
15 Pretoria Road	-	Negligible - Minor
34 and 35 Pretoria Road	Negligible - Minor	-
36-45 & 46-48 Pretoria Road	Moderate	Negligible - Minor
49-50 & 52-56 Pretoria Road	Minor -Moderate	
58-67 Pretoria Road	-	Minor
Brook House Primary School	Minor - Moderate	Negligible - Minor
867 & 869 High Road	Moderate	-
865 High Road	Major	-
849- 853 High Road	Major	-
841 High Road	Major	Minor
843 High Road	Minor	-
835 - 839 High Road	Moderate	-
831-833 High Road	Major	Minor
819-829 High Road	Major	Major
809-817 High Road	Major	Moderate
807 High Road	Minor	Minor
793-807 High Road	Minor	-
803-805 High Road	Minor - Moderate	
811a High Road	Major	
811a, 803-805 & 797 High	-	Moderate

Road	Minor	
820 & 824-828 High Road	Minor	-
818.822.830 & 832-838 High Road	Negligible - Minor	-
840-850 High Road	Minor	-
841 High Road	-	Minor
47-65 White Hart Lane	Minor	-
2-4 & 3-7 White Hart Lane	Minor	-
6-6a White Hart Lane	Minor	-

6.9.14 Officers have scrutinised the detailed results of the assessment in the ES (including Appendix 9.5) and associated addendum (including Appendix 5.1), which take account of the use of existing rooms, balconies/self-shading and whether rooms are lit by more than one window. Residual VSC values in excess of 20% 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

- 6.9.15 Chapter 9 of the ES and the Eddendum reports on an assessment of the likely significant effects of overshadowing on 14 surrounding main back gardens and amenity spaces (including 7 x back gardens and 3 x garden terraces that adjoin the northern boundary with the Cannon Road area, 2 x school Brook House School playground areas and 2 x grassed amenity areas close to Altair Close, to the northeast of the site). The ES also reports on an assessment of transient overshadowing of existing nearby gardens/amenity spaces for 21 March for the existing, extant consents, proposed and cumulative scenarios.
- 6.9.16 This BRE standard is met for 6 out of the 14 spaces. The 7 private gardens for Mallory Court and one of the 2 school playground areas would not meet the standard. However, it should be noted that the gardens are already partly overshadowed by the existing boundary wall and none currently receive two hours of sunlight on half of their area and the effects would be no worse than the extant Depot, Lendlease and Depot and Goods Yard consents (with approved and proposed both effectively representing a “mirror massing” baseline that is allowed for by BRE Guidelines. The ES identifies a Major Adverse effect for these gardens, a Major adverse effect for the garden of 841 High Road and a Moderate Adverse effect for the school playground.
- 6.9.17 The proposed tall buildings would cast long shadows throughout the day on 21 March (particularly in the early morning and late afternoon). However, the proposed towers would be relatively slender when viewed from the south and would be well spaced. Given this, the transient overshadowing assessment shows that the ‘fingers’ of shadow that would be cast by the proposed tall buildings would sweep around the surrounding area and with the exception of

- 6.9.18 The supplementary assessment in the ES (Appendix 9.7) and Addendum (Appendix 5.1) comparing the shadowing of the extant Depot and Goods Yard consents and the Lendlease Scheme with the proposed scheme at 12.00 on 21 March shows a similar Minor to Moderate Adverse overshadowing effect.

Glare

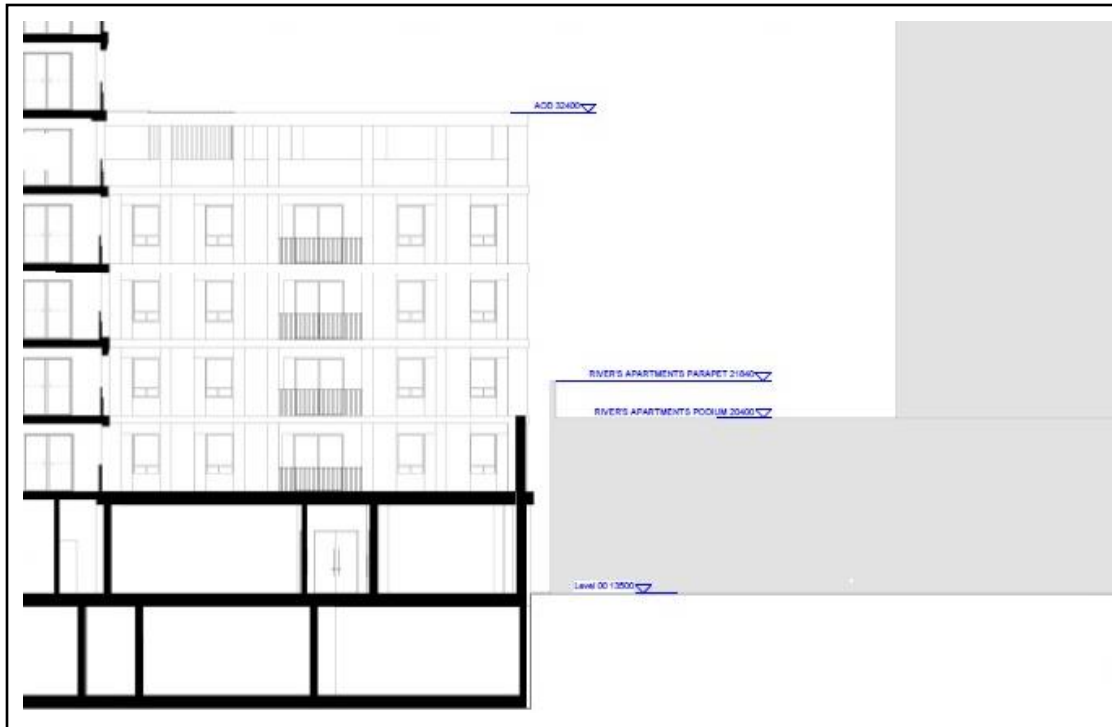
- 6.9.19 Chapter 9 of the ES and the Addendum reports on an assessment of the likely significant effects of solar glare from the proposed towers on 4 x locations along the adjoining Overground railway tracks where sunlight reflected by the proposed buildings could cause glare for train drivers. Four locations on adjoining streets that face the site (approaching traffic junctions) were also assessed. The impacts identified in the ES are as follows:

- GLR_001A – Railway travelling north – Minor Adverse;
- GLR_002A – Railway travelling north – Minor Adverse;
- GLR_003A – Railway travelling south – Minor Adverse;
- GLR_004A – Railway travelling south – Minor Adverse;
- GLR_005A – High Road travelling southwest – Minor Adverse;
- GLR_006A – Brantwood Road travelling west – Minor Adverse with retention of landscaping mitigation;
- GLR_007A – Northumberland Park travelling west – Minor Adverse; and
- GLR_008A – White Hart Lane travelling northwest – Minor Adverse

Boundary treatment/security

- 6.9.20 The existing brick wall that runs along the northern boundary of the site with the Cannon Road area would be demolished. The future boundary would be largely set by the building lines formed by Depot Blocks C, D and E, which would extend up to the boundary.
- 6.9.21 Where it meets the northern boundary, proposed Depot Block ABC would comprise a tall single-storey void space above a ramp down to proposed basement car parking (with shared amenity space on top of its eastern side) and four storeys of housing on the western side (with shared amenity space on top this). This would adjoin River Apartment' terrace. This River Apartments terrace (20.40m AOD, with a parapet at 21.84m AOD) would be approx. 2.9m above the proposed lower shared amenity space, but approx. 9.1m below the proposed higher shared amenity space (approx. 15.1m below the colonnade around the proposed higher space).

Figure 07: Depot Block ABC boundary with River Apartments



6.9.22 Proposed Depot Block D would result in a building of 17.6m AOD (4.6m above ground) immediately to the south of gardens to Mallory Court. This is approx. 2.5m above the height of the existing wall at the western end of Mallory Court and 0.88m below the height of the existing wall at the eastern end of Mallory Court. The proposals also provide for the provision of a timber fence at the rear of the Mallory Court gardens, hard against proposed Block D.

6.9.23 Block E would be single-storey on the northern boundary, before stepping back and up to five-storeys. The single-storey element would be between 16.8 and 17.7m AOD (between 3.8 and 4.7m above ground). Block E would be between approx. 2.4m and 2.7m away from a two-storey flank wall of the Brook House Primary School.

6.9.24 Officers consider that the proposed boundary treatments would safeguard security. It is recommended that a planning condition reserves details of the ground floor building elevation or boundary fence for Block D, to enable further consultation with residents at a discharge of condition stage over the boundary treatment they would find most acceptable.

Overlooking/privacy

6.9.25 The proposed shared amenity space for proposed Depot Block ABC would be approx. 16m from homes in the existing River Apartments building to the north – which itself has a terrace at its first-floor level. The space would have a parapet and colonnade around it, which would help reduce the perception of being overlooked.

- 6.9.26 The proposed northern Depot residential tower (Block A) would rise out of Blocks B and C and its north facing windows would be approx. 30m away from existing secondary living room windows in River Apartments. It would be approx. 60m away from the existing two to four-storey residential buildings on the west side of Pretoria Road that face the site (across the railway lines).
- 6.9.27 Bedroom and living windows in proposed Depot Block D, would generally be 20m away from similar windows in Mallory Court, which is within the 18-21 metres yardstick separation distance referred to in the Mayor of London's Housing SPG, although the two wings to the building would be only 10m away. However, proposed Block D has been designed such that north facing windows in the two proposed Wings would be obscure glazed and comprise secondary windows to living rooms and bedrooms and bathrooms. Main living room and bedroom windows are proposed east and west facing. Officers consider that this proposed detailed arrangement would safeguard privacy. It is also proposed to include planting for the proposed first floor level communal garden space to safeguard privacy and it is recommended that landscaping details are reserved by condition.
- 6.9.28 Proposed Depot Block E would present a largely imperforate northern flank wall to Beachcroft Court (two floors of housing that sits above the Brook House Primary School), with only bathroom windows in it. These would be approx. 9.5m away secondary living room/kitchen windows in Beachcroft Court – with these rooms primarily looking east and west. There would be north-facing secondary bedrooms and living rooms in Block E, which would be approx. 13.5 and 19.5m away respectively. Officers consider this proposed relationship to be satisfactory.
- 6.9.29 Proposed Depot Block G would be at 17/18m away from existing homes in the rear part of No. 865 High Road, which is considered satisfactory.
- 6.9.30 The proposed GY Blocks raise fewer issues in terms of overlooking and privacy of existing residential neighbours. Proposed GY Blocks A, B and F would be approx. 43 to 53m away from the existing two to four-storey residential buildings on the west side of Pretoria Road that face the site (across the railway lines). Homes in proposed GY Block F would be further away. Proposed GY Block G would have windows facing south towards the Grange (non-residential) and housing on the upper floors of No. 18 White Hart Lane, but the separation distance of approx. 38m would safeguard privacy

Wind and Microclimate

- 6.9.31 This is addressed below, under the Wind and Microclimate heading. In summary, no likely significant residual wind effects are predicted.

Noise

6.9.32 The mainly residential nature of the proposed scheme means that, subject to using planning conditions to limit hours of use in the proposed 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

6.9.33 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.

6.9.34 Fall-back Position. The ES reports that the daylight and sunlight effects of the proposed scheme is generally similar to the extant schemes. Table 19 below summarises these differences.

Table 19: Daylight and Sunlight effects – difference between the proposed and extant consented schemes

Receptor	Daylight – Residual VSC levels	Sunlight – Residual APSH levels
River Apartments	2% better to 0.8% worse/ average 0.2% worse.	Within BRE guidelines.
Ambrose Court	0.3% better to 0.5% worse/average 0 difference.	Very similar.
Mallory Court	0.9% better to 0.8% worse/average 0 difference.	Very similar.
Brook House School	5.1% better to 1.9% worse/average 0.2% better.	Within BRE guidelines.
Beachcroft House	1.5% better to 0.7% worse/average 0.1% worse.	Very similar.
2-7 Pretoria Rd	0.2% better to 0.1% worse/average 0.1% better.	Within BRE guidelines.
8-10 Pretoria Rd	0 difference to 0.1% worse/average 0 difference.	Within BRE guidelines.
11 Pretoria Rd	1.1% better to 0.2% worse/average 0 difference	
12 Pretoria Rd	1.2% better to 0.3% worse/average 0 difference	
15 Pretoria Rd	0.9% better to 1.6% worse/average 0.3% worse.	

Receptor	Daylight – Residual VSC levels	Sunlight – Residual APSH levels
16 Pretoria Rd	0.6% better to 2.0% worse/average 0.9% worse.	
17 Pretoria Rd	0.2% better to 2.3% worse/average 1.4% worse.	
Lorenzo House	0.5% better to 2.9% worse/average 1.2% worse.	
36 & 37 Pretoria Rd	2.9% worse to 3.2% worse/average 3.0% worse.	Lower overall APSH values, but very similar winter APSH values.
38 & 39 Pretoria Rd	2.9% worse to 3.1% worse/average 3.0% worse.	
40-45 Pretoria Rd	2.6% worse to 3.2% worse/average 2.8% worse.	
46-48 Pretoria Rd	0 difference to 2.1% worse/average 1.3% worse.	
49-51 Pretoria Rd	1.3% worse to 1.6% worse/average 1.4% worse.	slightly lower overall APSH values, but very similar winter APSH values.
52-57 Pretoria Rd	0.5% worse to 1.2% worse/average 0.8% worse.	
58-67 Pretoria Rd	0.2% better to 0.2% worse/average 0.3% worse.	Very similar.
865 HR	0.3% better to 1.4% worse/average 0.1% worse.	Within BRE guidelines.
849 HR	Very similar.	
841-843 HR	Very similar.	
837 HR	Very similar.	
813-817 HR	Very similar.	Very similar.
831-833 HR	Very similar.	Within BRE guidelines.
6-6a WHL	Very similar.	
30 WHL	Very similar.	

6.9.35 The ES includes an overshadowing assessment for the extant schemes, demonstrating that the shadows cast by the approved towers would be shorter, but also broader, with narrower shafts of sunlight penetrating between them. Overall, the ES concludes that the significance of effect of the proposed scheme would be similar to the schemes with extant consent (as discussed above).

- 6.9.36 The northern boundary treatment with the Cannon Road area in the proposed scheme would be no different from that previously approved and there would be no different effect in terms of property security. Likewise, subject to the use of planning conditions, there should be no significant differences in noise effects (during both the operational and construction phases).
- 6.9.37 There would be a very similar relationship between proposed Depot Blocks D and E and Malory Court and Beachcroft Court respectively as with the previously approved schemes and so no significant differences in overlooking or privacy are anticipated. Likewise, no significant differences in overlooking/privacy conditions are expected between proposed GY Block G and homes along the High Road than in the approved Goods Yard scheme.
- 6.9.38 The proposed relationship between proposed Depot Block and C with River Apartments should improve relative to the approved Depot scheme with proposed Block C presenting an impermeable wall towards River Apartments, whereas the approved Depot Block C has windows that face River Apartments at a distance of approx. 17-25m. However, windows in proposed Block A would be closer, with separation distances of between approx. 30-35m, as opposed to approx. 51.4m in the approved Depot scheme.
- 6.9.39 The likely wind/microclimate effects on neighbours from the proposed scheme are generally expected to be similar to those associated with the approved schemes.

6.10 Transportation and Parking

- 6.10.1 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).
- 6.10.2 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.
- 9.8.2 Other key relevant London Plan policies include Policy T2 – which sets out a ‘healthy streets’ approach to new development and requires proposals to demonstrate how it will deliver improvements that support the 10 Healthy Street Indicators and Policy T7 – which makes clear that development should facilitate safe, clean and efficient deliveries and servicing and requires Construction Logistics Plans and Delivery and servicing Plans.

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

6.10.4 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.

6.10.5 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

6.10.6 The majority of the site has a PTAL 4, with the north western corner having a lower PTAL of 3). The site is also located in the Tottenham North CPZ. The application is supported by a Transport Assessment (TA), which incorporates a draft Delivery and Servicing Management Plan, Framework Travel Plan and Outline Construction Logistics Plan.

Trip Generation

6.10.7 The applicant's TA estimates the likely trip generation for the main modes of transport based on applying trip rates derived from TRICS to the proposed uplift in number of homes and commercial floorspace from the two extant consented schemes. The expected total development trips and the expected net increase in trips over and above the consented schemes are set out in Table 20 below.

Table 20: Total trips and net increase in person trips (over and above consented schemes HGY/2018/0187 and HGY/2019/2929)

Mode	AM Peak Hour		PM Peak Hour	
	In	Out	In	Out
Total people	279 (23)	594 (113)	538 (66)	443 (45)
Vehicles	39 (12)	98 (30)	74 (23)	54 (14)
Pedestrians	100 (6)	260 (34)	258 (17)	224 (11)
Cycles	7 (1)	11 (2)	11 (1)	11 (2)
Rail	71 (5)	98 (20)	89 (13)	71 (9)
Bus	68 (6)	103 (24)	86 (13)	71 (10)

6.10.8 The cumulative impact assesses the likely impacts associated with the proposed scheme and key consented nearby schemes (HGY/20/20/1584 & HGY2021/2283). The expected trips are set out in Table 22 below.

Table 22: Cumulative committed and proposed development total multi-modal trip generation

Mode	AM Peak Hour		PM Peak Hour	
	In	Out	In	Out
Rail	239	130	277	226
Bus	128	130	157	94
Cycle	20	49	60	36
Walk	153	395	431	325
Private Vehicle	102	175	190	129
Total	642	879	1,115	810

Public transport capacity and protection

6.10.9 The TA distributes the expected net change in public transport trips from the proposed scheme in isolation (set out in Table 22 above) and distributes these to the public transport network using 2011 Census origin-destination data for journeys to work. In summary, the proposed scheme is expected to result in a net increase in trips over and above the consented schemes (in and out/all directions) as follows: Rail (White Hart Lane Station): + 25 (AM Peak) and + 22 PM Peak and Bus (Various): + 30 (AM Peak) and + 23 PM Peak.

6.10.10 The Transport Assessment also considers the cumulative impact of the Lendlease permission (HGY2021/3175). In summary, this demonstrates that:

- No significant impact on London Overground line capacity (with the utilisation rate estimated to increase from 72% to up to 79% of maximum capacity between Bruce Grove and Seven Sisters in the AM Peak and from 20% to up to 24% of maximum capacity between Seven Sisters and Bruce Grove in the PM Peak);
- No significant impact on bus services (528 additional two-way trips in the AM Peak hour and 431 additional trips in the PM Peak. Approx. 43 buses per hour in each direction use. The worse impact, 200 additional trips heading south in the AM Peak hour would add four to five trips per bus); and
- No discernible impact on loadings on the Victoria Line.

6.10.11 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. The Mayors Stage 1 report also highlights capacity

Site Access

- 6.10.12 Vehicular access to the Depot part of the site would be as approved as part of the extant consents– i.e. from the High Road, with the existing signalised junction being modified and ‘tightened up’ (narrower carriageway and wider footways) and a secondary vehicular access connecting with Cannon Road to the north. The proposed two-way east to west access route (Pickford Lane) would be a residential street (5.5m carriageway and footway space either side) which prioritises people over traffic, removes clutter from the pavement and encourages slower vehicle speeds through narrowing of vehicle areas. Two new routes would punch through from the two cul-de-sacs on the Cannon Road housing area to the north. The western one would be an extension of Pickford Lane and would be a vehicular route. The eastern one would be pedestrian and cycle only.
- 6.10.13 Vehicular access to the Goods Yard part of the site would be from a priority junction on White Hart Lane, at a similar location to the existing crossover/access and to that of appeal scheme HGY/2021/1771). This would include a footway on both sides of a 5.5m wide carriageway at this point. This would serve the proposed north-south street (Embankment Lane) which would have a carriageway of 5.5m initially, but reducing to 3.7m as it moves north – with alternate way working refuse collection, loading/unloading and emergency access.
- 6.10.14 The Mayor of London Stage 1 Report calls for a Stage 1 Road Safety Audit of the proposed junction with White Hart Lane and of the narrower section of the proposed Embankment Lane to consider potential conflicts between vehicles and vulnerable road users. It is recommended that combined Stage 1 and 2 Audits are reserved by condition.

Future Access Points

- 6.10.15 Proposals for the Depot part of the site include vehicular routes either side of the proposed Peacock Park (to the front of Blocks B and G) and the applicant’s indicative masterplan for the remainder of the High Road West Site (north of White Hart Lane) shows these routes continuing south, either side of an extended park, allowing for future connection to a further phase of the masterplan to the south, in accordance with the HRWMF. Similarly, proposals for the Goods Yard part of the site make provision for two vehicular accesses to be provided on the east side of the proposed Embankment Lane and the indicative masterplan shows streets running east from these accesses, serving future development plots on the existing Peacock Industrial Estate. To enable satisfactory future connections with adjoining land, it is recommended that s106 planning obligations require a Future Connectivity and Access Plan to be approved by the Council.
- 6.10.16 The applicant anticipates that, as and when other land is developed, the primary point of access from White Hart Lane would move from the location proposed in this application eastwards to about where the vehicular access to the existing Peacock Industrial Estate is. This would enable the access and north-south ‘Embankment Lane’ proposed in this application to assume a reduced

Legal Highway Agreements

- 6.10.17 The proposed on-site vehicular, cycle and pedestrian routes are not designed to be adopted by the Council and would be managed and maintained by a private company. Works to the existing signalised junction on the High Road and works to create the access from White Hart Lan would need to be the subject of a legal agreement under Section 278 of the Highways Act 1980. This would secure details of how the proposed new streets tie in with the existing highway and junctions. It is recommended that a planning condition requires pre- and post-development highway condition surveys.

Pedestrian and cycle movement

- 6.10.18 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 proposed schemes would deliver would improve the site's connectivity with the surrounding existing walking and cycling routes as well as these public transport networks and activities.

Car Parking

- 6.10.19 The proposal scheme includes the following car parking provision:

- 49 x standard residential spaces;
- 85 x accessible residential spaces (each of the proposed wheelchair accessible homes having a space);
- 10 x commercial spaces;
- 4 x Car Club spaces; and
- 2 x accessible visitor spaces.

- 6.10.20 Residential car parking. The proposed overall residential parking would be a provision of 16:1. This proposed level of provision is acceptable and the proposal to deliver 1:1 accessible car parking space for the proposed wheelchair accessible homes from the outset is welcome. This is in line with consented schemes.

6.10.21 The residential car parking would be located partly 'on-street' (along the proposed 'Peacock Lane' on the Depot part of the site), partly in a ground floor undercroft space (Depot Block D), but mainly in 2 x single-level basement areas under GY Blocks A to F and Depot Blocks ABC.

6.10.22 Commercial car parking. The proposed commercial spaces would be located the basement located under GY Blocks A-F. The Transport Assessment makes clear that this would be for the a re-provided Carbery Enterprise Park. The existing Carbery Enterprise Park comprises 11 x general industrial/light industrial/office units, amounting to approx. 1,012sqm, with about 10 car parking spaces. There is no explicit 're-provision of the Estate within the proposed scheme. The proposed overall commercial floorspace amounts to 2,068sqm (GEA) and officers consider that 400sqm of this space should be specifically for office/R&D/light industry (Use Class E(g) (i) (ii) & (iii)), as approved as part of the extant Goods Yard scheme. It is recommended that the proposed Car Parking Management Plan manages the commercial car parking, enabling spaces to be decommissioned when they are not needed by commercial occupiers and brought back in to use when they are needed (based on needs of individual prospective business tenants prior to occupation).

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

- Car-capped agreement– Prohibiting residents (other than Blue Badge holders) from obtaining a permit to park in the CPZ, plus £4,000 (tbc) for revising Traffic Management Order;
- Car Club - Establishment or operation of a car club scheme, which includes the provision of at least 4 Car Club bays and four cars (with actual number to be approved following discussion with prospective Car Club operators) with, two years' free membership for all units and £50.00 per year credit for the first 2 years; and
- Car Parking Design & Management Plan - To cover: Location and design of any temporary car parking spaces, Location and design of car parking spaces, Provision of Electric Vehicle Charging Points (direct provision for 20% of spaces, with passive provision for the remaining 80%), Allocation and management of residential car parking spaces (prioritising disabled people, then families with children then others); Allocation and management of commercial car parking spaces, Provision and management of disabled car

parking spaces to allow for the required number of such spaces (up to 87 overall) and all car parking spaces to be leased, not sold outright.

- 6.10.24 In addition, although no comments have been received from LB Enfield on this application, the neighbouring authority did raise concerns over the potential for overspill car parking in relation to what is now the extant consent for The Depot part of the site. In response to these concerns, s106 planning obligations in relation to that consent secured a baseline car parking survey, monitoring and if monitoring shows a problem, a financial contribution of up to £20,000 for LB Enfield towards consultation and possible implementation of a CPZ. It is recommended that similar planning obligations are secured in relation to any permission.

Cycle Parking

- 6.10.25 The proposed scheme makes provision for 1,660 cycle parking spaces, including long (1,569 residential and 15 commercial) and short-stay (76) parking. 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. There is also a lack of provision of locker and changing facilities for the proposed commercial space. It is recommended that a planning condition reserves approval of these details.

Travel Planning

- 6.10.26 The applicant's 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

- 6.10.27 The applicant's Draft Delivery and Servicing Plan estimates that there would be around 14 delivery and servicing trips in the AM Peak hour, 10 in the PM Peak hour and 34 in the delivery and servicing peak hour, which has been identified at being between 11.00 AM and 12.00 Noon. It is proposed to accommodate these trips at 8 x on-street loading and unloading bays across the site. The proposed arrangements and draft Plan are considered acceptable. It is recommended that such a Plan 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

- 6.10.28 The applicant's Construction Management Plan (CMP) and Construction Logistics Plan (CLP) takes account of the EIA cumulative schemes and sets out vehicular routing and access parameters and identifies strategies to reduce potential impacts. As identified in the Mayor's Stage 1 Report, does not address the proposed phasing of construction in relationship to the remainder of Site Allocation NT5 or with events at the stadium. It is recommended that a planning condition secures the approval of a detailed CLP, which could address these issues.

Transportation - Summary

- 6.10.29 The proposed scheme improves connectivity between the Cannon Road area and the High Road and White Hart Lane for pedestrians and cyclists and include a safe environment and cycle parking and facilities that encourages walking and cycling. 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 Lendlease scheme for adjoining land within Site Allocation NT5) show that, subject to the Mayor of London's confirmation at Stage II, impacts should be manageable. There would be some adverse impacts during construction, but this can be satisfactorily managed by the recommended conditions.
- 6.10.30 Fall-back Position. The transport arrangements for the proposed scheme are similar to those for the extant Goods Yard and Depot schemes, with similar connectivity and permeability across the combined sites. As with the consented schemes, associated impacts on highway and public transport is considered acceptable. Proposed car parking would be at a ratio of 0.16:1, which is the same as was approved in relation to the extant Depot scheme and less than the 0.25:1 that was approved for the extant Goods Yard scheme (so a lower ratio overall). Cycle parking would meet the more generous cycle parking standards in the 2021 London Plan.

6.11 Energy, Climate Change and Sustainability

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

Mayor of London to demonstrate actions undertaken to reduce life-cycle emissions.

- 6.11.2 London Plan Policy SI3 calls for major development in Heat Network Priority Areas to have a communal low-temperature heating system, with the heat source selected from a hierarchy of options (with connecting to a local existing or planned heat network at the top).
- 6.11.3 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.
- 6.11.4 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 Buildings Regulations (residential development) and achieve at least BREEAM 'Excellent' standard for 'Wat 01' water category or equivalent (commercial development).
- 6.11.5 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.
- 6.11.6 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.
- 6.11.7 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.
- 6.11.8 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

- 6.11.9 The principal target is to achieve a reduction in regulated CO2 emissions over Part L 2021 Building Regulations. 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. As this development is proposing to connect to a Decentralised Energy Network, this officer assessment reports on carbon emissions with SAP2012/ SAP 10 carbon factors.

- 6.11.10 'Be Lean.' The proposed scheme adopts a 'fabric first' approach, including façade configuration and specification that balances the desire to have winter passive solar gains but avoid summer overheating; high performance glazing, reduced air permeability and good insulating fabric, use of high-efficiency mechanical ventilation and heat recovery, use of LED lighting and efficient cooling for the proposed commercial units. Following revisions to the elevations of the proposed towers, these proposed measures are expected to save 90.3 tonnes of carbon dioxide per year (a site-wide 11% saving above the Building Regulations 2013). The minimum carbon reduction of 15% is met by the non-domestic floorspace. The residential fabric minimum reduction of 10%, called for in London Plan Policy SI 2 is also met.
- 6.11.11 'Be Clean.' The applicant is intending to connect directly to the Energetik Heat Network, using heat generated at an Energy Centre located to the north east of the site on the Edmonton Eco-Park close the North London Waste Authority Energy Recovery Facility (ERF). The ERF is currently under construction, and will provide low carbon heat when it comes on stream in 2025/26. This is advance of the proposed ERF becoming operational, so initially heat would be supplied back-up gas boilers at the Energetik Energy Centre, with the energy source being switched from gas to lower carbon heat from waste as soon as the ERF is operational. Connection to the proposed DEN is expected to save 635 tonnes of carbon dioxide per year (a 74% saving above the Building Regulations 2013).
- 6.11.12 The Council has committed plans to deliver a North Tottenham District Energy Network (DEN) to connect to the Energetik Heat Network.
- 6.11.13 'Be Green.' Photovoltaic (PV) arrays are proposed for the majority of new buildings across the site with a capacity of 228 kWp, amounting to approx. 1,005 sqm. The proposed PV panels are anticipated to save 83.7 tonnes of carbon dioxide per year (an 8% saving above the Building Regulations 2013).
- 6.11.14 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 SAP2012 emission factors)

	Total regulated emissions (Tonnes CO2/year)	CO2 savings (Tonnes CO2/year)	Percentage savings
Part L 2013 baseline	855.1		
Be lean	764.8	90.3	11%
Be clean	220.1	544.8	64%
Be green	179.9	40.2	5%
Total savings		675.2	79%
		CO2 savings off-set (tonnes CO2)	
Off-set		6,420	

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

6.11.16 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 214 tonnes per year. Based on 30-years of annual carbon dioxide emissions costed at £95 per tonne, this amounts to £608,690 (or £669,559 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.

6.11.17 Whole Life-cycle Emissions. The applicant’s Sustainability and Energy Statement includes a Whole-life Carbon Assessment has been undertaken in accordance with the latest published GLA guidance (October 2020). This assessment accounts for the whole life-cycle carbon emissions of the proposed development and outlines the actions taken to reduce life-cycle carbon emissions. It aims to fully capture the development’s carbon impact: unregulated and embodied emissions as well as emissions associated with maintenance, repair and end of life scenarios. This finds that the total emissions for Modules A1-A5 were

569 kgCO₂e/m² (between the GLA's 'aspirational' and 'standard' benchmarks were 247 kgCO₂e/m² in modules B1-B5, 1005 kgCO₂e/m² in modules B6-B7, 51 kgCO₂e/m² in modules C1-C4 and – 167 kgCO₂e/m² in module D. The highest embodied carbon in Modules A1-A5 is attributed to the superstructure (61%) and substructure (27%). In the other Modules, the highest contributors in embodied carbon are the services (39%), superstructure (29%) and finishes (18%). A number of areas have been identified to calculate more accurately and to reduce the embodied carbon of the buildings through the detailed design process. It is recommended that this is required by way of a planning condition.

6.11.18 Energy conclusion. The overall anticipated on-site carbon emission reductions over Building Regulations (2013) of 79% 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.

6.11.19 The proposed '5% '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 have been optimised, given other demands for roof-top space.

Overheating

6.11.20 The applicant's Sustainability and Energy Statement includes overheating and cooling analysis. The proposed scheme mitigates against the risk of overheating through the passive design measures set out below and active cooling measures are only proposed for the proposed commercial units:

- Solar gain control (Façade shading elements, rationalised glazing ratios and low solar transmittance glazing);
- Natural ventilation (openable windows and acoustic louvres); and
- Additional mechanical ventilation (mechanical ventilation systems with heat recovery and summer bypass and ceiling fans where necessary).

6.11.21 The applicant's assessment using the London Weather Centre files for the 2020s show full compliance with the relevant CIBSE TM59 overheating risk criteria (with ceiling fans in place for the highest risk homes). The application generally meets London Plan Policy SI4, and demonstrates that ceiling fans would help to mitigate future overheating risk. It is recommended that a planning condition requires an updated Overheating Report for Blocks to be submitted and approved (to include a retrofit plan, including ceiling fans).

Environmental sustainability

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

- All areas are to be designed for longevity and disassembly;
- Open spaces and commercial spaces in particular will be designed with flexibility and adaptability in mind;
- Two buildings are to be retained and refurbished;
- All other buildings to be demolished will aim to recycle / re-use / recover 95% of the material and achieve 95% beneficial use of excavation wastes where possible; and
- During operation, all commercial and residential waste be allocated adequate space for recycling, organic waste and bulky waste segregation.

6.11.23 The Statement sets out the Key Commitments (Table 4-1), Bill of materials (Table 4-2) and Recycling and waste reporting form (Table 4-3). The Statement proposes that as the scheme is developed beyond planning and into detailed design it is reviewed and updated with further detail, providing clear targets and guidance for the procurement, construction and operation process of the scheme. If planning permission were to be granted this could be secured by planning condition.

6.11.24 Construction waste. The applicant's Site Construction Management Plan states that a Site Waste Management Plan (SWMP) is developed to reduce and manage/re-use waste during demolition and construction. It is recommended that this is secured by a planning condition.

6.11.25 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 Buildings 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).

6.11.26 Thames Water has raised concerns over the ability of the water network infrastructure to accommodate the needs of the proposed development. It is recommended to require appropriate studies by way of pre-commencement planning conditions.

6.11.27 Building Performance. The applicant's Sustainability and Energy Statement includes a BREEAM pre-planning assessment (BREEAM 2018 New Construction, Shell Only Retail) which demonstrates that the proposed new commercial units could achieve an 'Very Good' rating, meeting the minimum requirement of Local

Plan Policy SP4. It is recommended that this is secured by use of a planning condition.

- 6.11.28 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
- 6.11.29 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.
- 6.11.30 Fall-back Position. The proposed scheme is similar to the Goods Yard and Depot schemes approved by the extant consents in terms of energy strategy (communal heating, connection to the proposed North Tottenham DEN and incorporation of PVs). The estimated overall carbon savings for the proposed scheme of 79% over Building Regulations (2013) (SAP2012 carbon factors) compares favorably with those achieved for the consented Goods Yard and Depot scheme, although direct comparison is not straight forward due to differences in SAP calculations. It is not possible to meaningfully compare overheating outcomes for proposed and consented schemes.
- 6.11.31 Subject to the use of appropriate conditions and s106 obligations, other environmental outcomes (construction waste, water consumption and Considerate Constructors Scheme) would be similar across the proposed and consented schemes. Given London Plan policy development, the proposed scheme would also be subject to Circular Economy and Whole Life Carbon Cycle controls that were not required by policy that was in force when permission was granted for the extant consented schemes.

6.12 Flood Risk, Drainage and Water Infrastructure

- 6.12.1 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.
- 6.12.2 London Plan Policy SI13 and Local Policy SP5 expect development to utilise Sustainable Urban Drainage Systems (SUDS).
- 6.12.3 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.

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

Flood Risk

- 6.12.5 The majority of site is in Flood Zone 1 and has a low probability of flooding from tidal and fluvial sources. The southernmost part of the Goods Yard part 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 approx. 30m to the south of the site. The site is within a Critical Drainage Area.

- 6.12.6 The submitted Flood Risk Assessment (FRA) considers flooding from pluvial and groundwater sources and from sewers also to be low. It finds that all of the proposed land uses are appropriate for Flood Zone 1 and that landscaping (a Less Vulnerable use) that is proposed for the small part of the site that is within Flood Zone 2 is appropriate.

- 6.12.7 There is a small area between the Goods Yard and The Depot with a 'medium' to 'high' risk of surface water flooding. This corresponds to localised depressions in the topography but represents only a small part of the overall site area. Surface water is proposed to be discharged by gravity to the Thames Water surface water sewers in High Road and White Hart Lane at a restricted rate equal to the calculated greenfield runoff rate for the site in accordance with Policy SI13 of the London Plan. Proposed Sustainable urban Drainage Systems (SuDS) features would limit the surface water discharge rate from the site to 14.16l/s (the 1;100-year greenfield runoff rate). This attenuation represents a significant reduction in the peak rate of surface water runoff entering the Thames Water sewer. With the proposed measures in place, the risk of flooding from surface water and the surcharge of combined sewers is considered to be low. Since the proposed surface water drainage strategy represents an improvement in surface water flood risk, officers agree that this meets the requirements for development within Critical Drainage Areas within Policy DM26.

- 6.12.8 Foul water from the proposed development is proposed to be discharged to the existing Thame Water foul sewers at a peak rate of 39.15l/s, which 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

- 6.12.9 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.

6.12.10 Rainwater harvesting and rainwater infiltration have been considered but discounted. So too have green and brown roofs – other than podium level gardens on the Goods Yard part of the site. A series of rain gardens, below ground attenuation around tree pits and permeable paving (focused around the proposed Embankment Lane and Southern Square) are proposed to attenuate water in order to reduce the peak flow rate of surface water discharge. The Goods Yard part of the site would discharge to the culverted watercourse (Moselle River) via attenuation and a flow restriction device to the Moselle River watercourse and local sewer network. The Depot part of the site would discharge to the existing Thames Water sewer located under the High Road via attenuation and a flow restriction device. As outlined when considering flood risk above, the proposed measures would limit water runoff to the 1;100-year greenfield runoff rate.

6.12.11 The Council as Lead Local Flood Authority has confirmed the proposed surface water drainage arrangements are acceptable. Consent would be needed from the Environment Agency for any connection to the Moselle culvert and from Thames Water for connection to its network. The Environment Agency has no comments to make. Thames water has identified water infrastructure capacity for 99 dwellings. To ensure adequate capacity exists, it is recommended that a Grampian condition is imposed that ensures adequate capacity exists/ can be provided prior to commencement of development.

6.12.12 It is proposed that the SUDS features are privately managed and maintained and the applicant's Drainage Strategy includes a SuDS Maintenance Plan that is acceptable to the Council as Lead Local Flood Authority. It is recommended that this is secured by way of a planning condition. Conditions are also recommended to safeguard water mains and other underground water assets, as requested by Thames Water.

6.12.13 Fall-back Position. The proposed scheme is similar to the Goods Yard and Depot schemes approved by the extant consents in terms of drainage strategy and the use of SuDS and, with appropriate conditions in place, provide similarly acceptable flood risk and drainage solutions.

6.13 Air Quality

6.13.1 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.

- 6.13.2 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).
- 6.13.3 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.
- 6.13.4 The applicant's Assessment considers the exposure of future residents 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 2028 scenario, meaning the site as a whole is considered acceptable for housing.
- 6.13.5 The proposed scheme would 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 site layout would avoid creating a street canyon where pollutants could be trapped and the proposed streets and spaces follows TfL's Healthy Streets approach encourages walking and cycling;
 - The scheme would include a relatively low level of car parking (with 0.16 residential car parking spaces per home and 10 x commercial spaces) with 20% active Electric Vehicle Charging Points (EVCPs) and passive provision for remaining spaces to have EVCPs;
 - Homes would have a Mechanical Ventilation with Heat Recovery (MVHR) system (with the need to open windows limited to purge scenarios), 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.
- 6.13.6 The applicant's Assessment does identify likely adverse effects from dust during the demolition and construction. It is recommended to use planning conditions to manage and minimise such impacts, in line with the applicant's Site Construction Management Plan and the measures highlighted by LBH Pollution.
- 6.13.7 Fall-back Position. The proposed scheme is similar to the Goods Yard and Depot schemes approved by the extant consents in terms of energy (communal heating, connection to the proposed North Tottenham DEN and incorporation of PVs) and transport ('car-lite, generous cycle parking, travel planning to encourage walking and cycling and provision of Electric Vehicle Charging Points

etc.) strategies. Subject to conditions and s106 planning obligations to secure these strategies and mitigate adverse construction effects, the proposed and extant schemes would be 'Air Quality Neutral' and provide similarly acceptable environments for future residents and neighbours.

6.14 Wind and Microclimate

6.14.1 London Plan Policy D8 seeks to ensure that public realm areas are well-designed, including, ensuring that microclimate considerations such as wind is 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.

6.14.2 Chapter 10 of the ES reports on an assessment of the likely significant effects of wind. This is based on both Computer Fluid Dynamics (CFD) and, at the request of officers at the informal EIA scoping stage, wind tunnel testing. The ES adopts significance criteria that are based on the Lawson Comfort Criteria for 'sitting', 'standing', 'walking (leisure)', 'walking (business)' and 'uncomfortable' and 'safety.' 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, the application scheme and the Printworks application scheme. It also takes account of the masterplan and massing guidance in the HRWMF for the rest of Site Allocation NT5 - as modified by the masterplan set out in the applicant's DAS.

6.14.3 Chapter 10 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. Initial validation work between DFD and the wind tunnel tests showed good correlation on wind comfort, but the wind tunnel flagged up some safety issues not identified by the CFD. The source of the discrepancies was investigated and the assessment approach has been validated. A further refined CFD model was used to reduce windiness and a number of revisions to proposed buildings and landscaping have captured the revised mitigation in to the scheme. Whilst account has been taken of the likely significant temporary effects during construction, the officer summary below focuses on permanent effects.

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

Table 23: Residual wind effects

Effect	Mitigation & monitoring	Residual effect
Safety for pedestrian access to and passage through / past the Site	Screening and Landscaping measures planned and discussed	'Negligible'
Comfort for pedestrian access to and passage through / past the Site	Screening and Landscaping measures planned and discussed Ongoing: Maintenance of trees	'Negligible'
Comfort for recreational use of amenity spaces	Balustrades, Landscaping Measures	'Negligible'
Comfort for existing activities within surrounding area	None required	'Negligible'
Cumulative – pedestrian safety and comfort	No additional measures above those discussed for the completed development	'Negligible'

6.14.5 The recommended conditions would ensure that the embedded mitigation is delivered as an integral part of the scheme. Subject to this, officers consider that the proposed scheme would result in an acceptable wind environment.

6.14.6 Fall-back Position. The proposed scheme is significantly different from the Goods Yard and Depot schemes approved by the extant consents (HGY/2018/0187 & HGY/2019/2929) in terms of layout, building form, articulation, materials etc. and no direct comparison can be made. However, subject to conditions referred to above, the predicted resultant pedestrian environment for the proposed and extant schemes would be similarly acceptable. The proposed Depot Block C (which would be lower than the consented Block C) has been modelled to improve wind speed conditions for the existing River Apartments amenity space and the proposed Depot Block ABC amenity space. The scale and massing of the proposed buildings is similar to that of Goods Yard and Depot Scheme (HGY/2021/3175).

6.15 Trees

6.15.1 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.

6.15.2 The Applicant's Tree Survey records 131 trees on and immediately adjacent to the site, the majority located around the western boundary. Of these trees, 4 are Category A (the highest quality), 102 are Category B, 20 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).

- 6.15.3 The Proposals proposal result in the loss of 20 trees. This includes 4 x Category B, 15 x Category C and 1 x Category U. Four mature prominent Category A London Plane trees (Nos. 3001, 3002, 3003 and 3004) – two on the site near the High Road footway and two in the footway itself – would be retained. The existing 4 x Category B sycamore and acacia trees in the rear garden of the Grange (Nos. 32-34A White Hart Lane) would not be affected.
- 6.15.4 It is recommended that a planning condition requires the protection of trees to be retained during the demolition and construction phases in accordance with relevant British Standards. The proposed scheme includes the provision of approx. 335 trees (195 at ground level and a further 140 across the proposed podium and roof gardens) and would see a significant net increase in trees on the site, including along the proposed streets.
- 6.15.5 Fall-back Position. The Goods Yard and Depot schemes approved by the extant consents (HGY/2018/0187 & HGY/2019/2929) would (in combination) and the consented Goods Yard and Depot Scheme (HGY/2021/1771) also result in the loss of 20 trees. However, they would also retain the high-quality London Plane trees near the High Road frontage on the Depot part of the site and similarly not affect the trees in the garden of The Grange. The mainly 'outline' nature of the HGY/2018/0187 & HGY/2019/2929 consented schemes means that the number of proposed trees for those schemes are unknown, making direct comparison impossible. The Consented Goods Yard and Depot Scheme (HGY/2021/1771) would deliver the same quantum of additional tree planting.

6.16 Urban Greening and Ecology

Urban Greening

- 6.16.1 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.
- 6.16.2 The applicant's Design and Access Statement includes a calculation of the Urban Greening Factor (UGF) for the proposed scheme, based on the Mayor of London's March 2021 pre-consultation draft London Plan Guidance. This demonstrates that the scheme would have a UGF of 0.45, thus exceeding the relevant London Plan proposed interim target score. This is achievable by way of including a range of green infrastructure, extensive tree planting, including approx. 1,525sqm intensive green roof (with a substrate depth of 150mm), approx. 95sqm of extensive green roof (with a substrate of 80mm), approx. 1,048sqm rain gardens, approx. 50sqm water feature and extensive planting. Officers consider that the proposed green roof depths are too shallow and it is recommended that a planning condition secures details of these features for further consideration.

- 6.16.3 London Plan Policy G6 calls for development proposals to manage impacts on biodiversity and to aim to secure net biodiversity gain.
- 6.16.4 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 SPA/Ramsar area need to ensure no adverse effects.
- 6.16.5 The applicant's Ecological Appraisal Report 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. However, the west boundary is fringed by the railway embankment which is an important ecological corridor (and designated as a Green Corridor in the Local Plan). No bats or evidence of bats was identified during the ground level assessment of the site and building and emergence surveys found no evidence of roosting bats within the buildings and no incidental bat activity on the site, although bat activity along the adjacent railway embankment is considered likely.
- 6.16.6 The proposed landscaping would mitigate the loss of the limited extent of semi-natural habitats and include planting along the proposed Embankment Gardens, comprising a mixture of native and non-native species which would help to buffer the ecological corridor from the proposed scheme and proposed tree and understorey planting in this location is considered to be provide the greatest ecological enhancement. Elsewhere, the number of proposed trees and areas of proposed planting would exceed the number of trees and semi-natural habitats that would be lost, proposed understory planting of pollinator and woodland species, a mixture of ornamental and rain garden planting, an area of standing water and/or seasonally wet ground would introduce a new habitat to the site. All in all, the Report concludes that the proposed soft landscaping would enhance the site from the existing baseline conditions for biodiversity, providing habitat opportunities for a range of bird, bat and invertebrate species and result in a Biodiversity Net Gain.
- 6.16.7 If planning permission were granted, it would be possible to use planning conditions to require provision of bird and bat boxes in trees and buildings across

the site (particularly along the western boundary facing the railway), bee bricks within walls and other additional features to encourage biodiversity.

Habitats Regulation

- 6.16.8 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").
- 6.16.9 The application site is approx. 0.96km west of the Lea Valley Special Protection Area (SPA) at its closest point. 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 Lea Valley SPA/Ramsar comprises four underpinning Sites of Special Scientific Interest (SSSIs).
- 6.16.10 The application site lies approx. 4.9 km west of the Epping Forrest Special Area of Conservation (SAC) at its closest point. However, it is within the Zone of Influence (ZOI) of 6.2km as defined by Natural England in their 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 underpinned by a SSSI designation.
- 6.16.11 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.
- 6.16.12 The applicant's assessment also notes that the Habitat Regulations Assessments (HRA) for alterations to the Strategic Policies and The Tottenham Area Action Plan 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 applicant's assessment concludes that 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.
- 6.16.13 Natural England has reviewed the application and has raised no comment. Given the applicant's assessment and Natural England's response, officers 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 integrity test is therefore not required and the proposal is in accordance with Policies SP13 and DM19. The site is greater than 500m from the Lee Valley SPA, so Policy AAP6 does not apply.

6.16.14 Fall-back Position. The Urban Greening Factor (UGF) metric was introduced by London Plan Policy G5 since the extant schemes (HGY/2018/0187 and HGY/2019/2929) were granted planning permission. As such, with the information available, it is not possible to compare the UGF for the proposed and extant schemes. However, by comparing application drawings and documents, officers consider that there would be a greater amount of green infrastructure in the proposed scheme than the combined extant schemes. Officers also consider that the proposed greater green infrastructure and inclusion of the proposed Embankment Gardens communal green space along the western railway embankment in the proposed scheme would be likely to result in the proposed scheme having a greater Biodiversity Net Gain than extant schemes (HGY/2018/0187 and HGY/2019/2929). Given the layout and landscaping similarities to extant scheme (HGY/2021/177), it is considered that the proposal would result in a similar biodiversity net gain.

6.17 **Waste and Recycling**

6.17.1 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.

6.17.2 The applicant's revised Waste Management Plan, 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.

- 6.17.3 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. It is recommended that a planning condition to reserve the detailed management and maintenance arrangements.
- 6.17.4 The proposed commercial waste rooms have been sized for two days' worth of waste storage, although collections are anticipated to be daily. Each proposed block has a commercial waste store sized to accommodate the anticipated amount of waste generated by the commercial tenants in that block. Waste would be taken to the stores by the tenants and collected directly from the stores by the appointed commercial waste contractor. Commercial tenants would collect residual, mixed dry recyclable, glass and food waste separately.
- 6.17.5 Based on previous comments, LBH Waste officers are content with the proposed storage arrangements and make clear that commercial occupiers must arrange for scheduled waste collection and give the proposals a RAG traffic light status of AMBER.
- 6.17.6 Fall-back Position. The proposed scheme is significantly different from the Goods Yard and Depot schemes approved by extant consents (HGY/2018/0187 & HGY/2021/3175) in terms of waste and recycling arrangements and no direct comparison can be made. The proposed waste storage and collection principles are the same as extant consent (HGY/2021/1771).

6.18 Land Contamination

- 6.18.1 Policy DM32 require development proposals on potentially contaminated land to follow a risk management-based protocol to ensure contamination is properly addressed and carry out investigations to remove or mitigate any risks to local receptors.
- 6.18.2 The applicant's Land Contamination Assessment (Phase 1) reports on an initial Conceptual Site Model and a Preliminary Risk Assessment – taking account of ground conditions and the current and previous uses of the site (including, for the Goods Yard part of the site, as a scrap yard). It concludes by identifying Low to Moderate potential risks to a range of receptors, including construction workers and potential resident and recommends that an 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.

6.18.3 LBH Pollution officers raise no objection, subject to standard conditions on Land Contamination and Unexpected Contamination.

6.18.4 Fall-back Position. If planning permission were granted, it would be possible to secure similar mitigation by way of planning conditions. No material difference in effects between the proposed scheme and the extant schemes have been identified.

6.18.5 **Basement Development**

6.18.6 Policy DM18 relates to new Basement development and sets out criteria for where basements can be permitted. Basement development must be addressed through a Basement Impact Assessment (BIA).

6.18.7 The proposed scheme includes two single-level basement car parking areas – one under Depot Blocks ABC and one under GY Blocks A to F. The maximum proposed depth is expected to be approx. 5.4m (The Depot) and 5.3m (the Goods Yard). Both basements would be approx. 13m - 14m away from the existing railway track, which are on an embankment approx. 3m high. The proposed Depot Basement would be next to Rivers Apartments and close to Mallory Court. The proposed Goods Yard basement would be close to the Peacock Industrial Estate (within 2.5 metres at the closest point).

6.18.8 The BIA anticipates that construction would be formed with excavation support measures in place which are also likely to form a groundwater cut-off for temporary dewatering purposes. In advance of detailed design of basement excavation support measures, two viable retaining systems are analysed. The resulting settlements at the adjacent railway tracks are estimated to less than 3mm and are considered likely to be negligible. The River Apartments building is identified as being likely to be founded on piles and would therefore be less affected by any ground movement. Nevertheless, the BIA recommends that a relatively stiff system of excavation support (e.g. including temporary propping) would need to be adopted for basement excavation in this area to minimise resulting excavation induced ground movements. The BIA expects that adopting such a system should ensure that any resulting building damage would be between negligible and slight.

6.18.9 In respect the basement in the Goods Yard Part of the site, it is envisaged that with a resulting settlements adjacent to the railway tracks are estimated to be less than 2mm for both retaining systems tested. Owing to the close proximity of the basement with the shared boundary with Peacock Industrial Estate and the existing buildings fronting White Hart Lane, the BIA also recommends a relatively stiff system of excavation support (e.g. including temporary propping) to minimise associated excavation induced ground movements. Adopted such a system is envisaged to result in building damage of no more than slight.

6.18.10 Fall-back Position. The extant Goods Yard and Depot schemes (HGY/2018/0187, HGY/2019/2929 and HGY/2021/1771) include smaller sized separate single-level car parking basements, although the northern basement in the proposed scheme would be closer to the existing River Apartments, Mallory

House and the shared boundary with Peacock Industrial Estate and the southern basement will be closer to Peacock Industrial Estate. However, if planning permission were granted, it would be possible to secure similar mitigation in the form of detailed BIAs by way of planning conditions and no material difference in effects between the proposed scheme and the two extant schemes have been identified.

6.19 **Archaeology**

- 6.19.1 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.
- 6.19.2 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.
- 6.19.3 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 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.
- 6.19.4 The Greater London Archaeological Advisory Service (GLASS) 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. GLASS call 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. It is recommended that planning conditions similar to those attached to the extant Goods Yard and Depot permissions are attached to any permission.
- 6.19.5 Fall-back Position. The proposed scheme would be expected to have a similar impact on buried archaeology as the extant Goods Yard and Depot schemes. If planning permission were granted, it would be possible to use a planning condition similar to those attached to the extant Goods Yard and Depot consents to mitigate potential negative effects by requiring Written Schemes of Investigation.

6.20 **Fire Safety and Security**

- 6.20.1 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 guidance

On Fire Safety (Policy D12(A), Evacuation lifts (Policy D5(B5) and Fire Statements (Policy D12(B).

6.20.2 The scheme has been altered in direct response to Health and Safety Executive concerns regarding fire safety. This resulted in second stair cores being added to the tower blocks (buildings over 30 meters), independent lifts to basement level amongst other internal layout changes which resulted in small increase to the built envelope. The buildings and layouts have been designed to meet the requirements of London Plan Policy D5 and D12, associated guidance and latest Building Regulation Requirements relating to fire safety. As part of the Building Regulations 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.

6.20.3 Fall-back Position. The proposed scheme is significantly different from the Goods Yard and Depot schemes approved by the extant consents (HGY/2018/0187 & HGY/2019/2929 in terms of these issues (layout, vehicular access, height materials etc.) and no direct comparison can be made. Whilst the scale and layout of buildings is similar to consent HGY/2021/1771, the permission pre-dates latest guidance and regulations on fire safety. The proposed development therefore has improved fire safety measures compared to the previously consented schemes.

6.21 Equalities

6.21.1 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.

6.21.2 As discussed in the Design section, officers consider that, subject to planning conditions and s106 planning obligations to reserve design details, landscaping and secure satisfactory management and maintenance, the proposed scheme would provide an accessible and safe environment.

6.21.3 Furthermore, as noted in the various sections in this report, the proposed development provides a range of positive socio-economic and regeneration outcomes for the Tottenham area including additional publicly accessible open space and the provision of new housing. A substantial amount of the proposed housing would be affordable housing, a proportion of which could be Council homes at Social Rents. This overall provision would add to Haringey's stock of market and affordable homes.

6.21.4 It is recommended that an employment skills and training plan that ensures a target percentage of local labour is utilised during construction is secured by way of a s106 planning obligation. This would benefit priority groups that experience difficulties in accessing employment. It is also recommended that obligations secure relocation assistance for existing businesses on site and assistance for local tenders and employment skills and training and a financial contribution towards apprenticeships.

6.21.5 The proposed scheme would add to the stock of wheelchair accessible and adaptable dwellings in the locality and planning conditions could help ensure that the proposed layout and landscaping would help ensure that inclusive design principles are followed, in accordance with London Plan and local planning policy requirements.

6.21.6 Fall-back Position (Goods Yard Consent HGY/2018/0187 &HGY/2019/2929). If permission were to be granted, it would be possible to use planning conditions and s106 planning obligations to ensure the following:

- A similarly accessible and safe environment (with the proposed re-location of the previously approved access road off the western boundary to potentially provide a two-sided street providing a safer space);
- 16 more Low-Cost Rent homes (with more family sized homes and better alignment with the Council's Housing Strategy);
- The Council to have first right to purchase on 61 of the proposed Low Cost Rent homes (the same as the extant schemes);
- Similar employment training arrangements; and

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

- Similarly accessible and safe environment;
- Similar business relocation assistance;
- Improved basement parking access arrangement for the Goods Yard Part of the site;
- 23 fewer dwellings including 5 fewer affordable dwellings but same percentage provision of affordable housing;
- Higher proportion of family sized dwellings (175 (29.5%) as opposed to 147 (17%));
- Improved fire safety arrangements
- Increased commercial floorspace provision (+198sqm)

- 6.22.1 The proposed scheme would result in a residential-led mixed-use development of approx. 20% of the High Road West NT5 Site Allocation. The incremental development of the Site Allocation is acceptable in principle and the proposed scheme would satisfactorily (i) safeguard the continued operation of industrial uses on the Peacock Industrial Estate in the existing context and (ii) not prejudice the ability of the adjoining land to be developed in general accordance with Policy NT5 requirements and guidelines and the adopted High Road West Masterplan Framework in the longer term.
- 6.22.2 The site has a complex planning history. As made clear under Fall-back Position above, officers consider that there is a 'real prospect' that one or both of the extant THFC consents (the Goods Yard - HGY/2018/0187 and/or The Depot – HGY/2019/2929) could be implemented and built out or consent HGY/2021/1771). Case law has determined that such a fall-back position is a material planning consideration. As such, the merits of the application need to be considered against development plan policies and other material considerations in the following ways:
- Firstly, by considering the application as a stand-alone scheme; and
 - Secondly, by considering the application against the fall-back position established by the extant consents – including the likely additional benefits and dis-benefits/harm that would result from the application scheme over and above those associated with the two extant consents.

The proposed application scheme

- 6.22.3 The loss of existing uses would be acceptable, subject to a planning condition securing a minimum provision of 400sqm (GIA) of office/light industrial uses and a s106 planning obligation requiring relocation assistance for existing businesses on the Carbery Enterprise Park. The proposed net gain of 843 homes would make a significant contribution to meeting Haringey's London Plan housing target and the proposed flexible non-residential units would help mitigate loss of existing employment, enliven street frontages and offer opportunities for a range of commercial/ service uses.
- 6.22.4 Officers welcome the proposed site layout, which locates buildings along the western edge and the proposed north-south street (Embankment Lane) in from the boundary, so that it can become a two-sided street as and when other adjoining land comes forward for development. The scheme would also connect with and generally relate well with existing homes in the Cannon Road area and create a safe and accessible public realm.

The affordable housing offer is based on a Fast Track approach (not supported by a Financial Viability Appraisal) of 35.93% affordable homes (by habitable rooms, raising to 40% with grant), split 60:40 Low Cost Rent and Shared Ownership. The proposed dwelling mix meets the Housing Strategy preferred target and affordable homes would

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be satisfactorily integrated with Market housing across the site. The Council would also have the option of purchasing 61 of the proposed Low Cost Rent homes to provide at Social Rent levels to assist the redevelopment of Love Lane Estate. Officers consider that the offer would be acceptable, subject to s106 planning obligations securing viability reviews and ensuring affordability.

- 6.22.5 The proposed scheme would provide a small park (Peacock Park), which could be enlarged as and when development to the south comes forward, and other publicly accessible open space. Section 106 planning obligations would secure financial contributions towards providing the other social infrastructure (replacement library, community space and public realm) that is identified in Policy NT5 as being necessary. 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 1,810 new residents.
- 6.22.6 The overall dwelling mix, at 21.5% 3 and 4-bed homes is considered acceptable and 10% of homes of various sizes would be 'wheelchair accessible'. The proposed homes would generally be high- quality and future residents would 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 to be acceptable.
- 6.22.7 The design and materiality of the proposed tower façades creates articulation and constitutes high quality design. The tower blocks related well to the buildings at their base, with legible entrance points. The proposed buildings have been designed to achieve high levels of energy efficiency through both active and passive measures.

6.22.8 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 architectural quality of the proposed tall buildings is of a 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).

6.22.9 As set out in under Heritage Conservation, 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:

- Securing the future of the Listed Buildings at Nos. 867-869 High Road and improving their immediate setting;
- Securing the future of the locally listed Station Masters House and improves its immediate setting;
- Making a positive contribution towards the regeneration of Tottenham and acting as a catalyst for further regeneration and inward investment;
- Helping to deliver the HRWMF, including a positive contribution to place-making, provision of publicly accessible open space, new play space and public realm and the dual use of the proposed Brook House Yard amenity space with Brook House Primary School;
- Improving connectivity and permeability by providing new high-quality pedestrian and cycle routes and improving the streetscape of the High Road and White Hart Lane;
- Delivering 844 new high-quality homes, including affordable homes (between 35.9% and 40% by habitable room);
- Depending on phasing and timing, providing potential opportunities to decant existing residents from the Love Lane Estate to high-quality housing, to facilitate its regeneration as called for in Site Allocation NT5;
- Achieving ecological and biodiversity enhancements, including an overall net gain in biodiversity;
- Making a financial contribution towards social infrastructure;
- Making a positive contribution to reducing carbon dioxide emissions and surface water run-off;

- Creation of 270 FTE jobs during the construction phase with opportunities for local recruitment, skills development and sustainable careers.
- Creation of between 30 to 160 FTE new jobs (a net loss of between 30 and 160);
- Generation of a total New Homes Bonus of c. £1.7m alongside c. £1.5m a year in council tax revenue (of which nearly 75% would be retained by the LBH);
- Annual household spending of £12.7m on goods and services in the area; and
- Approx. £100,000 per year in business rates.

6.22.10 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.

6.22.11 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 would have relatively limited car parking (0.16:1) 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 supermarket and large surface car park). Assessment by the applicant demonstrates that (when taking account of the proposed scheme and committed development), there is unlikely to be significant impacts on London Overground line capacity or bus capacity and no discernible impact on the Victoria Line. 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.

6.22.12 The proposed buildings, open space, landscaping and sustainable drainage features have generally been designed to take account of climate change and to reduce carbon emissions. 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 District Heat Network and include some roof level PVs to help deliver 79% carbon emissions savings (SAP2012 carbon factors) (with offsetting financial contributions making up the shortfall).

- 6.22.13 The proposed scheme would safeguard and incorporate mature London Plane trees along the High Road frontage and incorporate a good level of green infrastructure, exceeding the relevant London Plan Urban Greening Factor interim score of 0.45. The proposed greening would deliver a significant Biodiversity Net Gain 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.
- 6.22.14 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.
- 6.22.15 Officers have taken full account of the findings of the submitted Environmental Statement and associated addendum and taken 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.
- 6.22.16 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.

Overall

- 6.22.17 Subject to the recommended planning conditions and s106 planning obligations to secure necessary mitigation and policy objectives, officers consider that the proposed scheme is acceptable on its own merits, when considered against the development plan and all other material considerations. Taking account of the fall-back position established by the four extant consents, it is considered that the benefits that would be delivered from the application scheme would outweigh additional dis-benefits/harm that the proposed scheme would result in.

7 COMMUNITY INFRASTRUCTURE LEVY (CIL)

- 7.1.1 Based on the information given on the plans, the Mayoral CIL would £3,965,235 and, based on the current Haringey CIL charge rate for the Eastern Zone of £15 per square metre, the Haringey CIL charge would be £3,039,400, giving a total

of £3,039,400. These are net figures and take into account social housing relief and based on the following additional assumptions:

- Phasing - indicative phasing set out in the Construction Management Plan.

- The proposed flexible commercial uses do not come forward as a 'supermarket' and proposed basements serve residential development only; and
- Affordable housing satisfies the criteria of Regulation 49 of the CIL Regulations (2010, as amended) and relief is granted before commencement.

7.1.2 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.

8 RECOMMENDATIONS

8.1 GRANT planning permission for the reasons set out in 1.2 above.

Appendix 1: Images of the site and proposed scheme



FIGURE 1. - Site Aerial Overview

KEY

 Site Boundary	 Overground Station	 Peacock Ind. Estate	 Carbery Enterprise Park
 Goods Yard Site	 High Road	 867-869 High Road	 Cannon Road Development
 The Depot Site	 Love Lane Estate	 Station Master's House	 Tottenham Hotspur Stadium
 White Hart Lane	 'The Grange'	 Pretoria Road	

 Not to scale



FIGURE 2. - Aerial View looking north east (1)



FIGURE 3. - Aerial View looking north east (2)



FIGURE 4. - Aerial View looking east (3)

Built Heritage



FIGURE 39. - Heritage Context Diagram



FIGURE 40. - Station Master's House (A)



FIGURE 41. - 'The Grange' (B)



FIGURE 42. - 867-869 High Road (C)



FIGURE 9. - View of The Depot Site from 'B&M' car park (1)



FIGURE 10. - View from The Depot Site looking west (2)



FIGURE 11. - View from The Depot Site looking east (3)



FIGURE 12. - View of the Heritage Block F, Nos. 867-869 High Road (4)

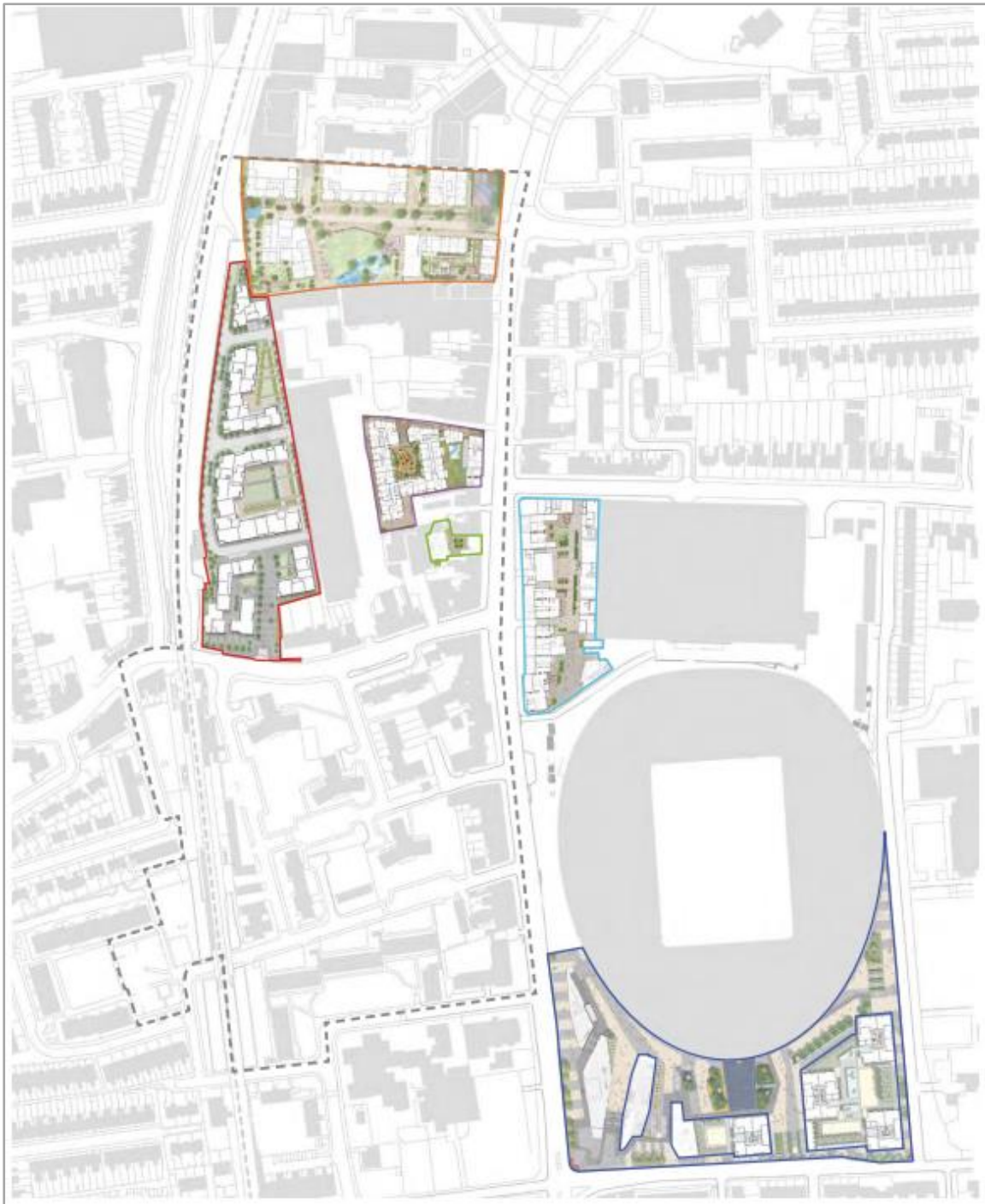
TAAP Allocation NT5



HRW Masterplan Framework 2014

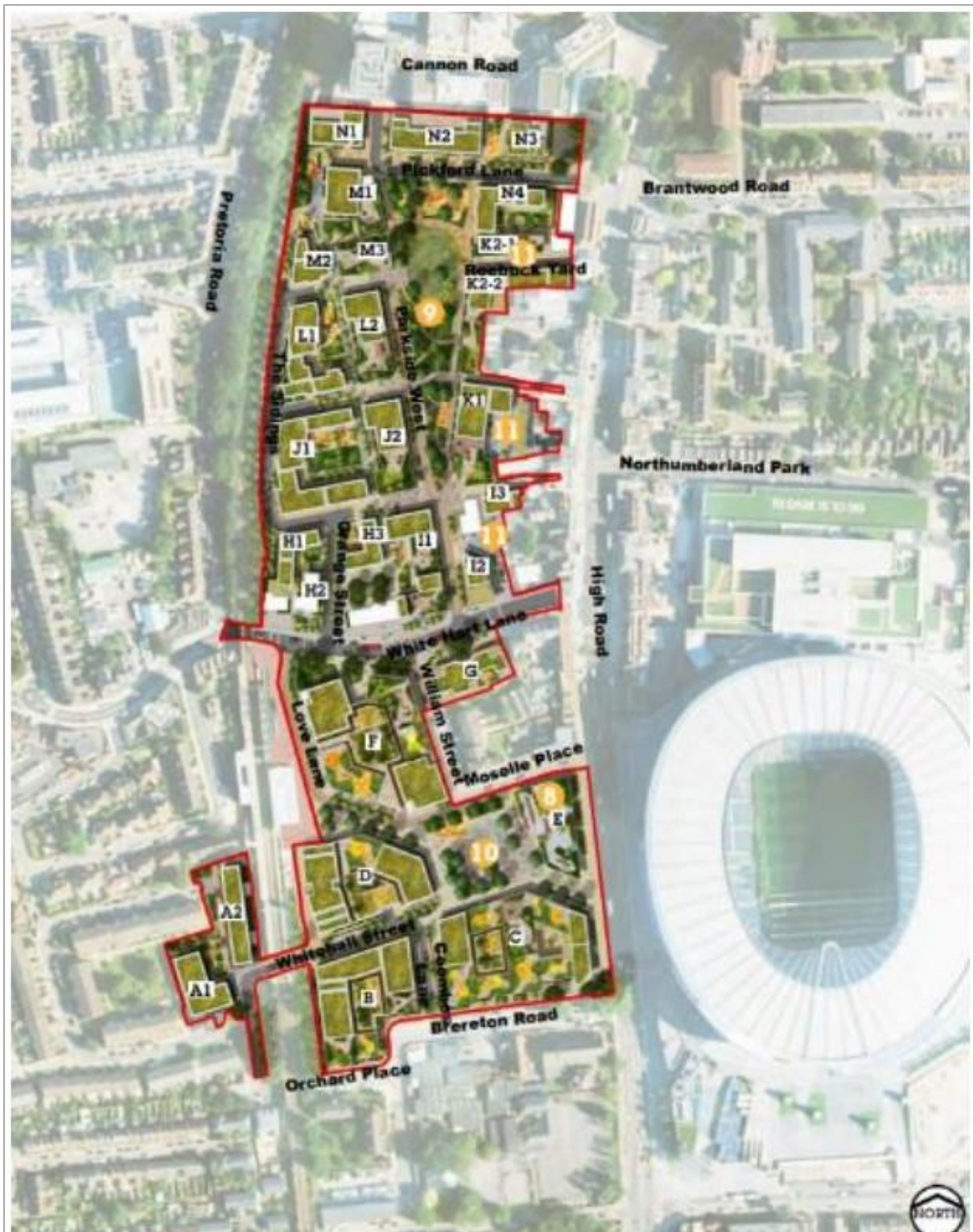


Development Context – THFC



1. Goods Yard Consent (HGY/2018/0187) – 330 homes
2. Depot Consent (HGY/2019/2929) – 316 homes
3. 807 High Road Consent (HGY/2021/0441) – 9 homes
4. Northumberland Terrace Consent (HGY/2015/3000) – ‘Cultural Quarter’
5. Southern Stadium Development Consent (HGY/2019/2929) – 585 homes
6. Printworks Consent (HGY/2021/2283) – 72 homes

Development Context Lendlease (HGY/2021/3175)



Lendlease Consent (HGY/2021/3175) – Illustrative Masterplan – up to 2,929 homes, 7225 sqm (GIA) of commercial space, new public parking measuring at least 5,300 sqm and new public square measuring at least 3,500 sqm.

Development Context Goods Yard and Depot Consent (appeal scheme) (HGY/2021/1771)



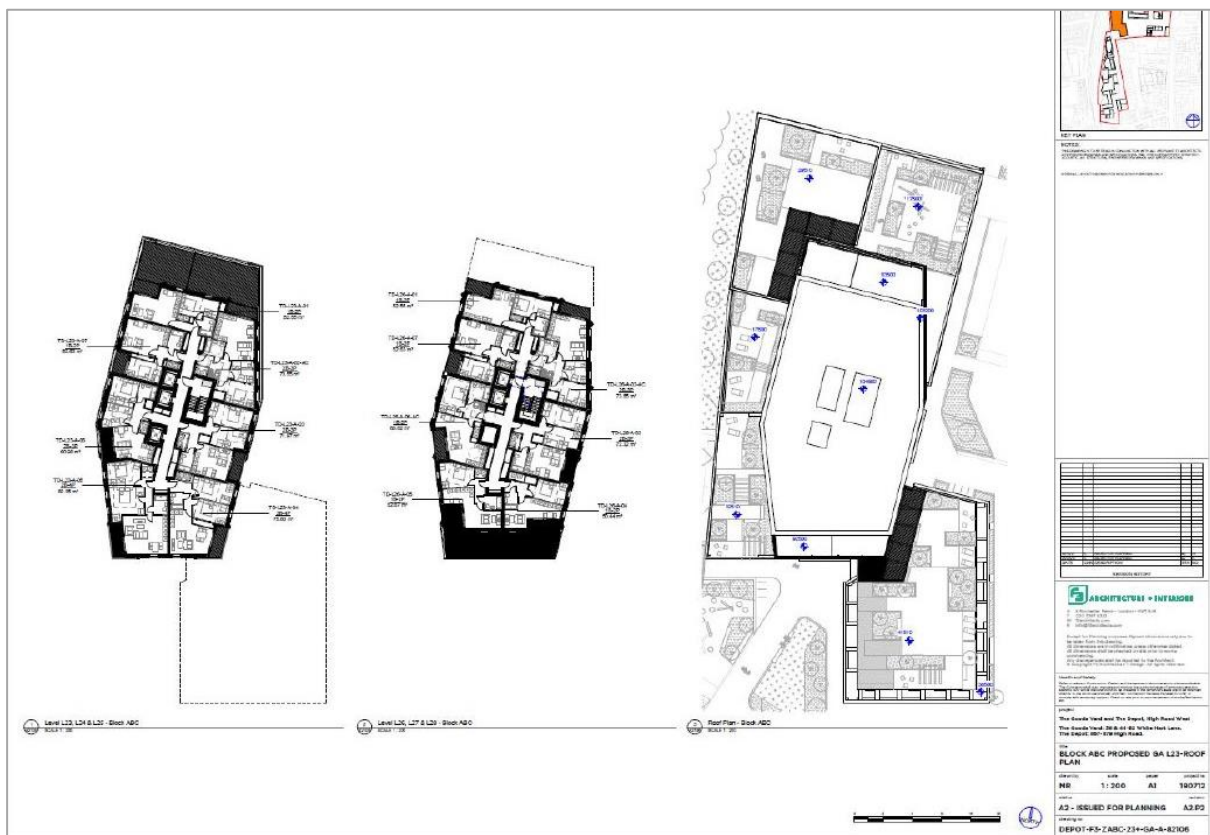
Approved Landscaping Plan



Approved ground floor plan (Depot)



Approved materials study (Depot Block ABC)



Approved floor plans L23-L28 & Roof Plan (Depot Block ABC)



Approved ground floor plan Goods Yard South (Blocks D-H)



Approved Development Section looking west – White Hart Land to south (left) & River Apartments to north (right)

TVIA Visual Comparison between Submitted scheme (left), Amended Scheme (Centre) & Approved appeal scheme (HGY/2021/3175) (right).

VIEW FROM WHITE HART LANE STATION



FIGURE 62. Feb. 2022 - As Submitted TVIA View No. 24



FIGURE 63. May. 2023 - Proposed Amendment TVIA View No. 24



FIGURE 64. Oct. 2022 - Approved Appeal Scheme TVIA View No. 24

VIEW FROM NORTHUMBERLAND PARK



FIGURE 66. Feb. 2022 - As Submitted TVIA View No. 6



FIGURE 67. May. 2023 - Proposed Amendment TVIA View No. 6



FIGURE 68. Oct. 2022 - Approved Appeal Scheme TVIA View No. 6

VIEW FROM BRANTWOOD ROAD



FIGURE 74. Feb. 2022 - As Submitted TVIA View No. 12



FIGURE 75. May. 2023 - Proposed Amendment TVIA View No. 12



FIGURE 76. Oct. 2022 - Approved Appeal Scheme TVIA View No. 12

VIEW FROM DURBAN ROAD



FIGURE 70. Feb. 2022 - As Submitted TVIA View No. 27

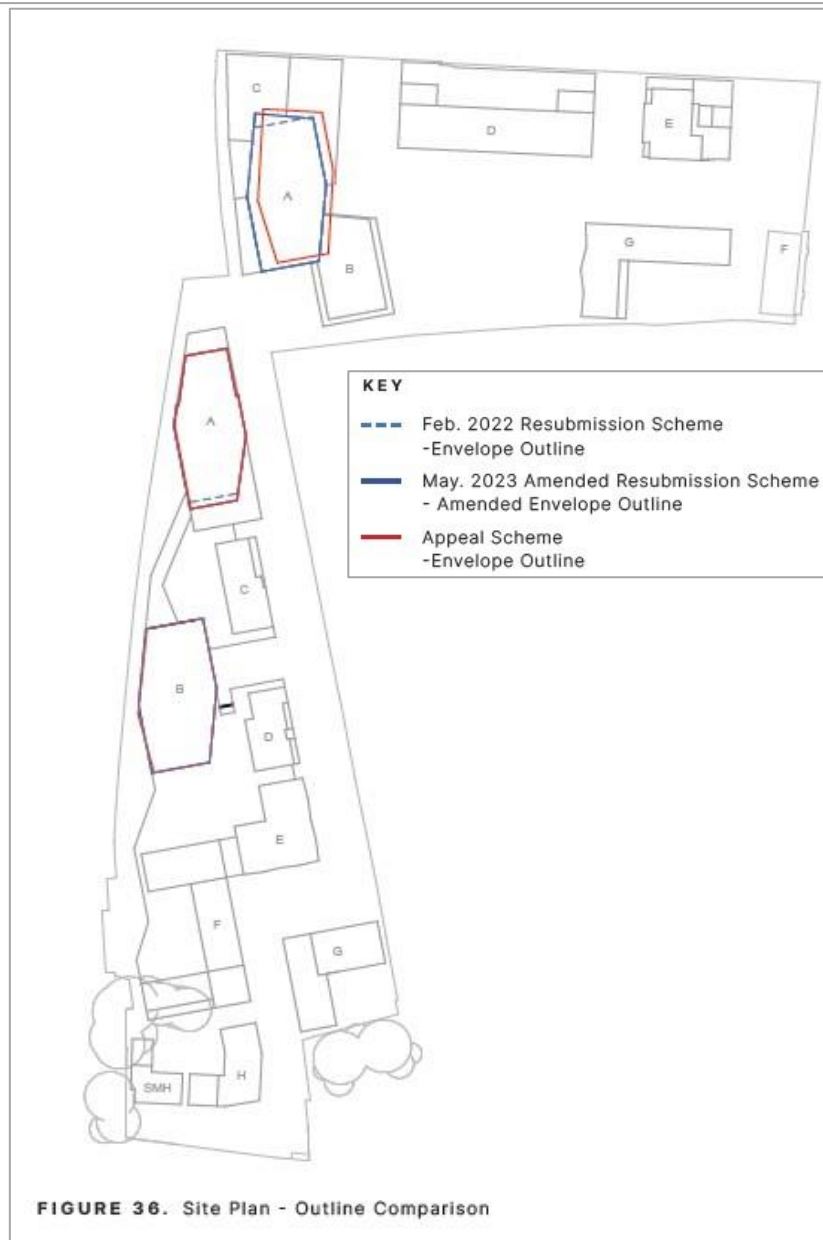
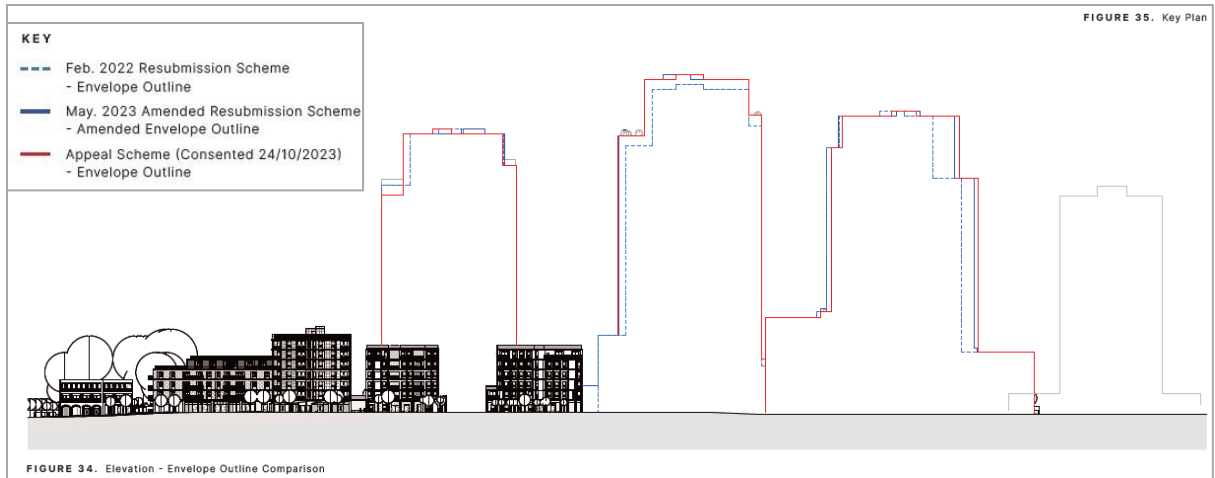


FIGURE 71. May. 2023 - Proposed Amendment TVIA View No. 27



FIGURE 72. Oct. 2022 - Approved Appeal Scheme TVIA View No. 27

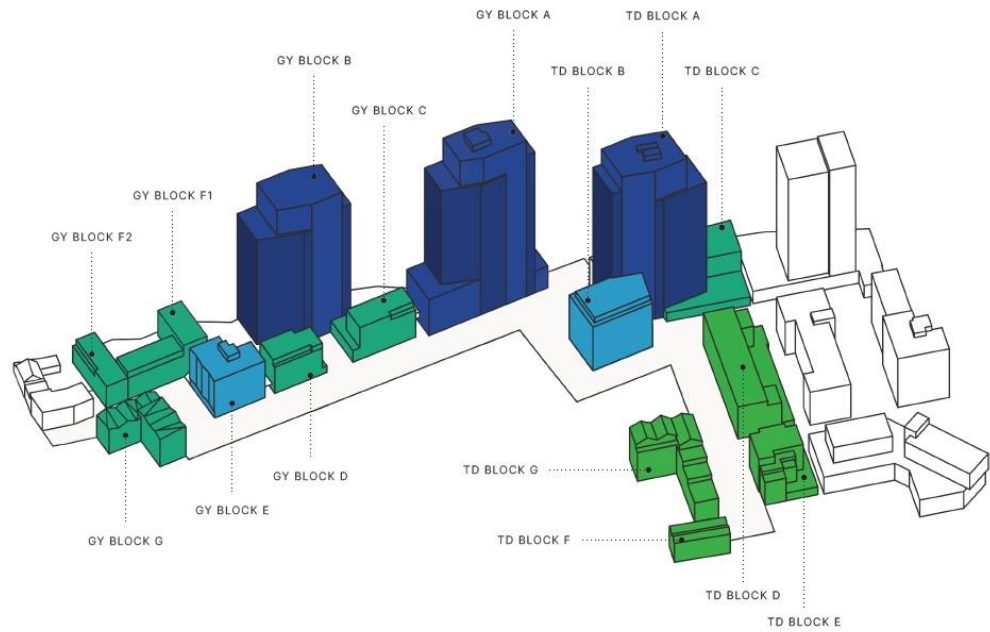
Sectional (Top) and Footprint (Bottom) Comparison between scheme originally submitted, amended proposed scheme and previously consented appeal scheme (HGY/2021/1771).



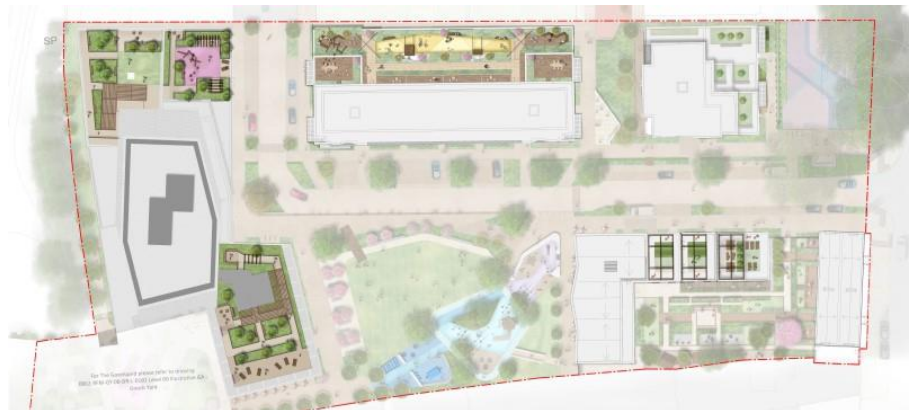
Scheme Overview

BUILDING HEIGHT CATEGORIES

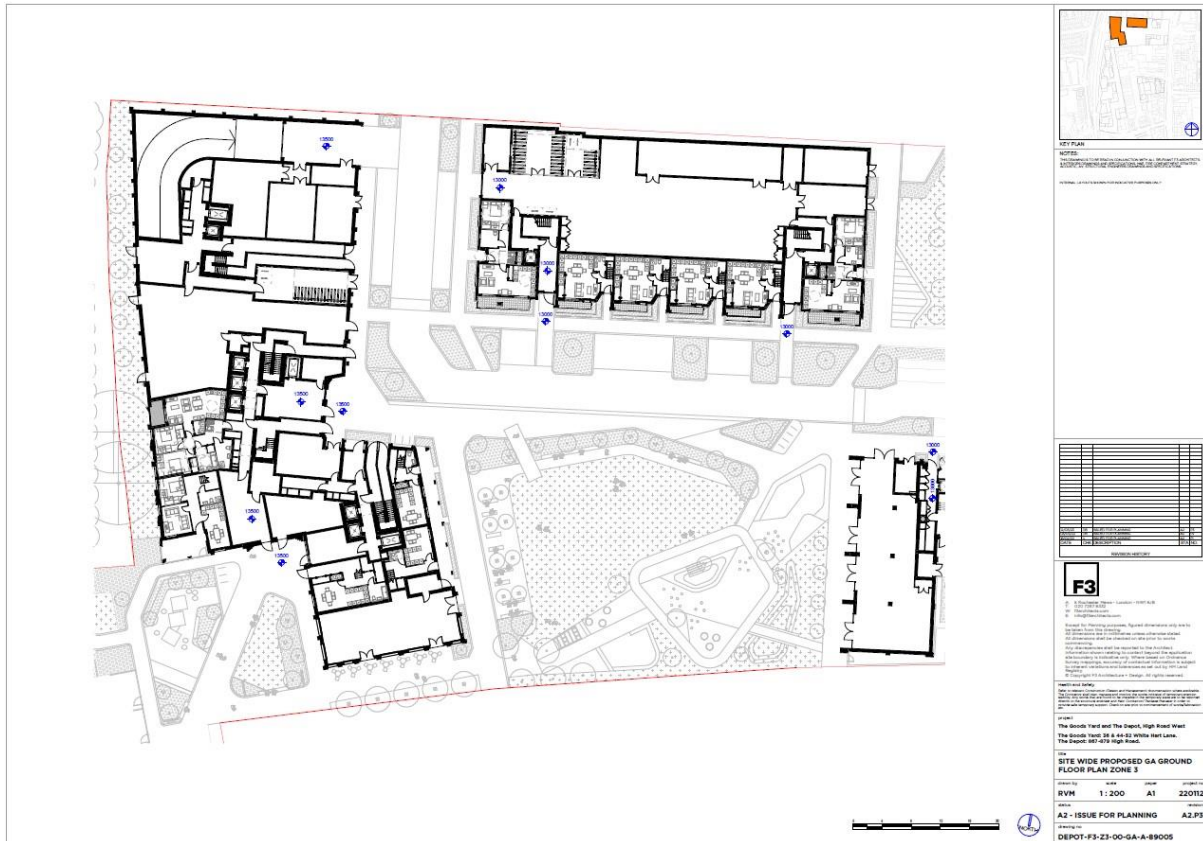
- 30m+ Buildings
- 18m+ Buildings
- 11m+ Buildings (above basement)
- 11m+ Buildings (no basement)



Proposed Building Heights



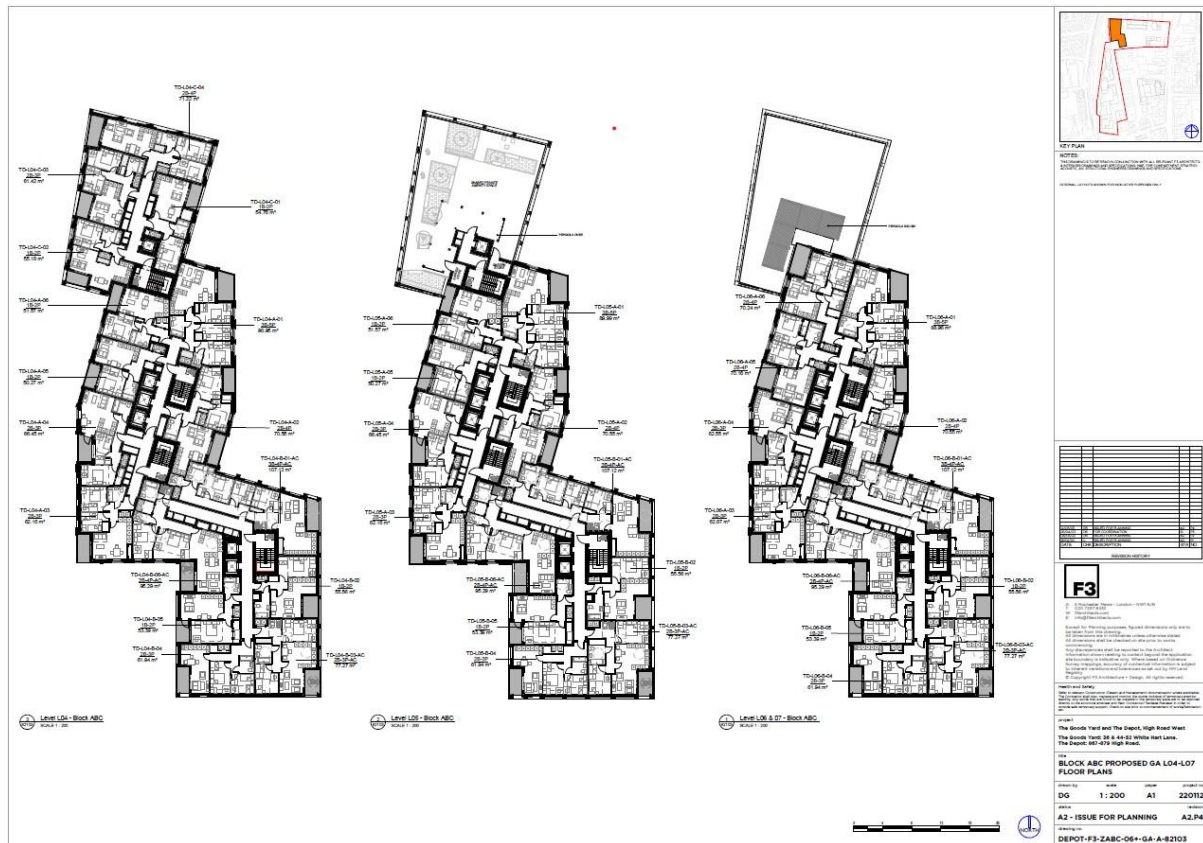
Proposed Illustrative Landscaping (Goods Yard left & Depot above)



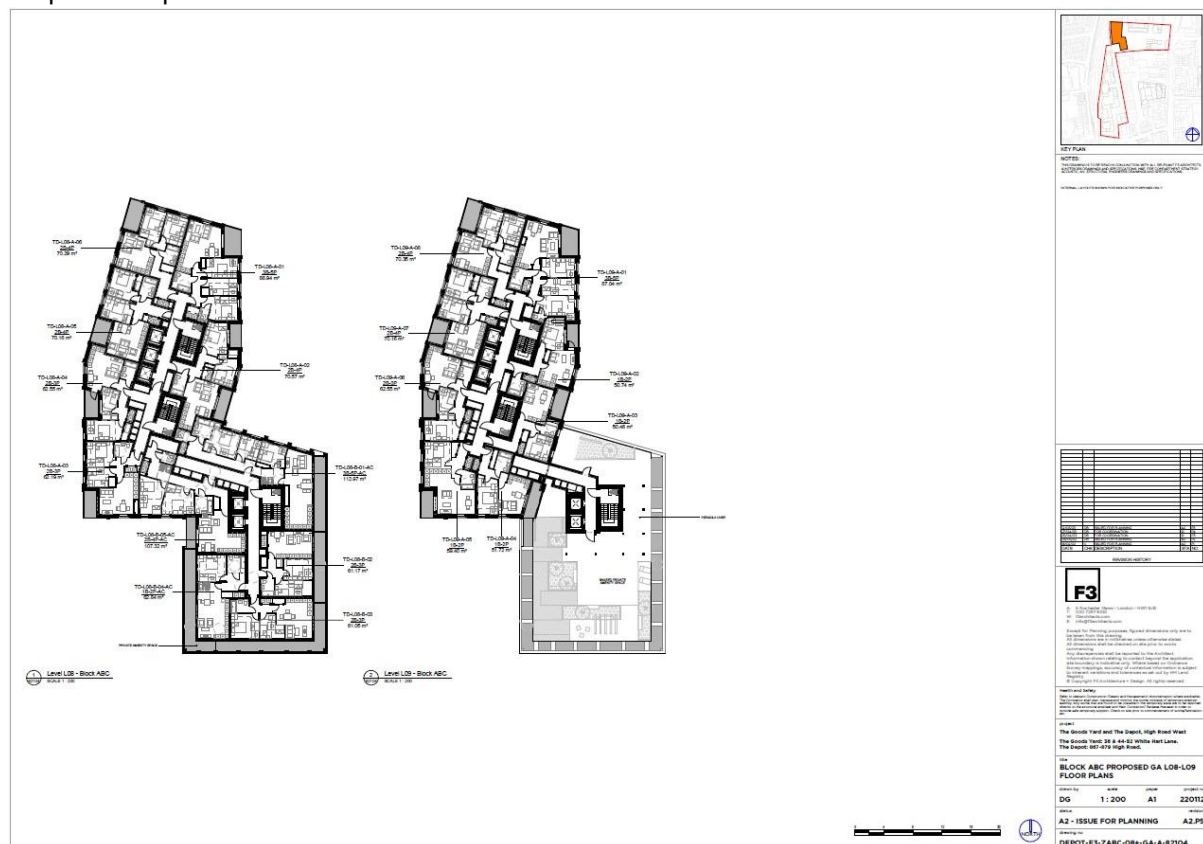
Proposed Zone 3 Floor Plan (Depot Blocks A,B,C,D & G Floor Plan)



Proposed Depot Block ABC L01-L03



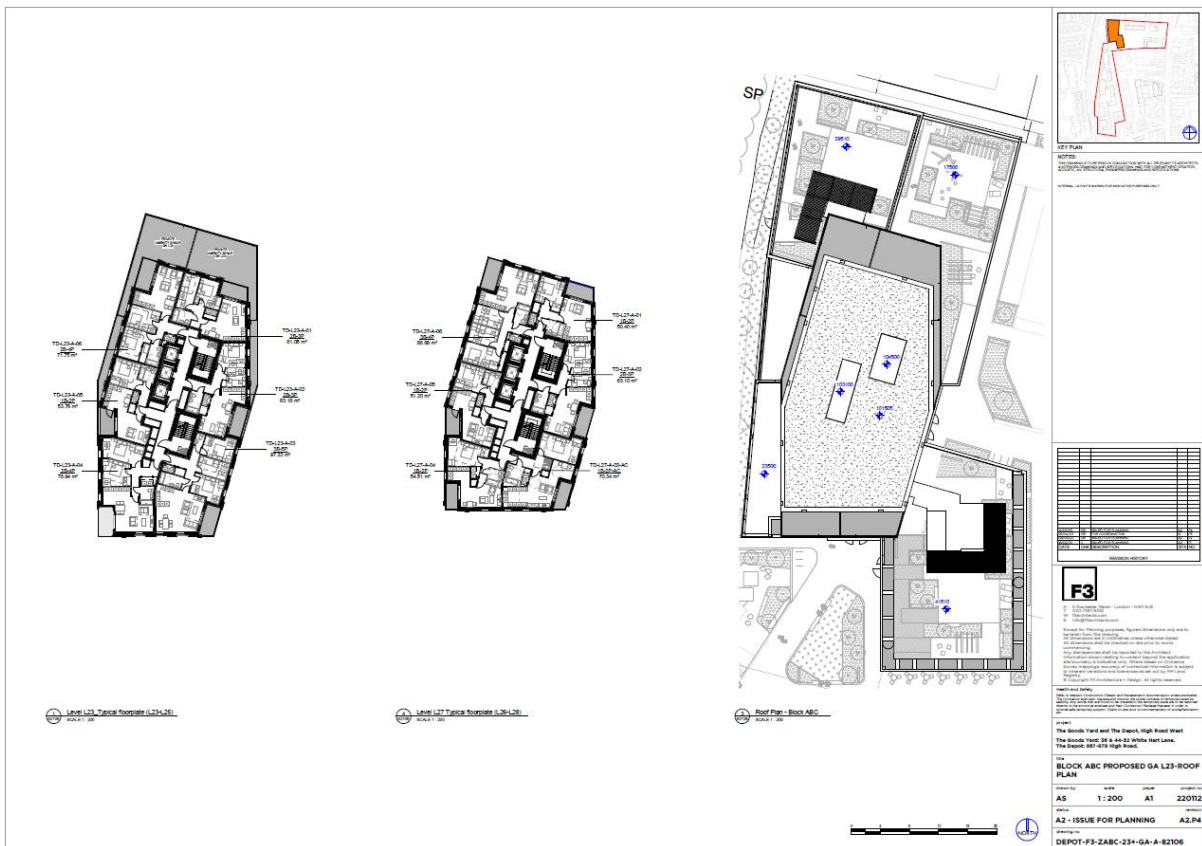
Proposed Depot Block ABC L04-L07



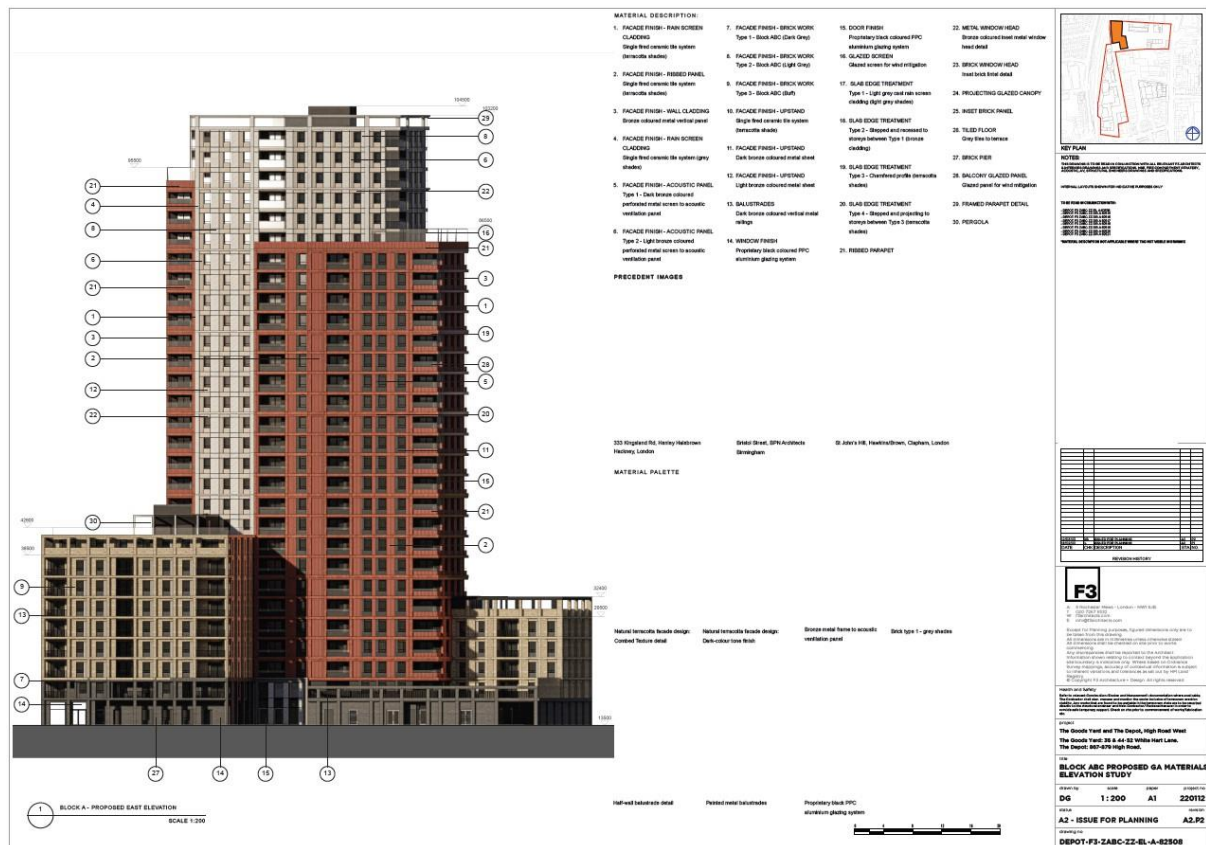
Proposed Depot Block ABC – L08-L09



Proposed Depot Block ABC – L10-L22



Proposed Depot Block ABC – L23



Proposed Depot Block ABC Materials Study

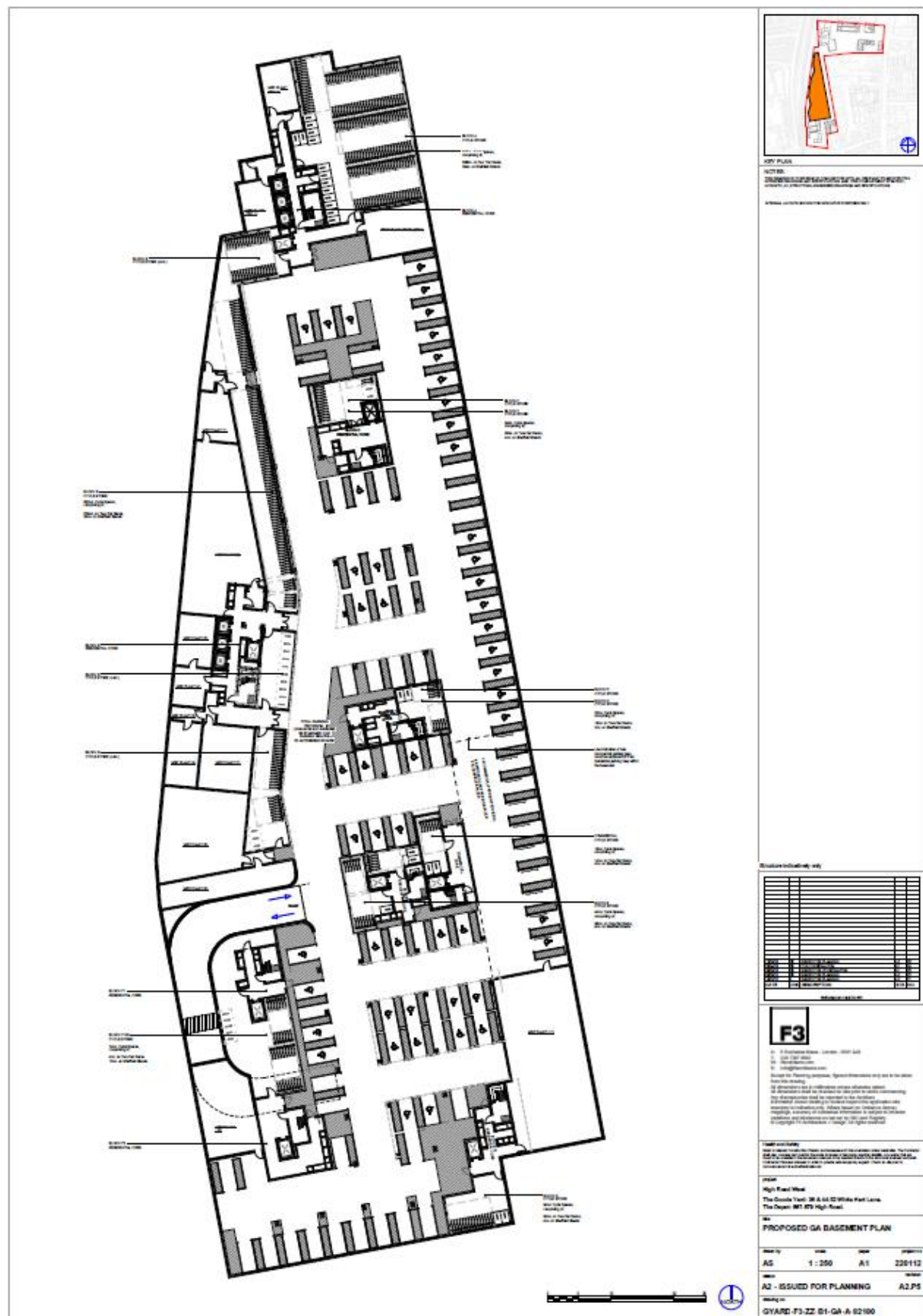


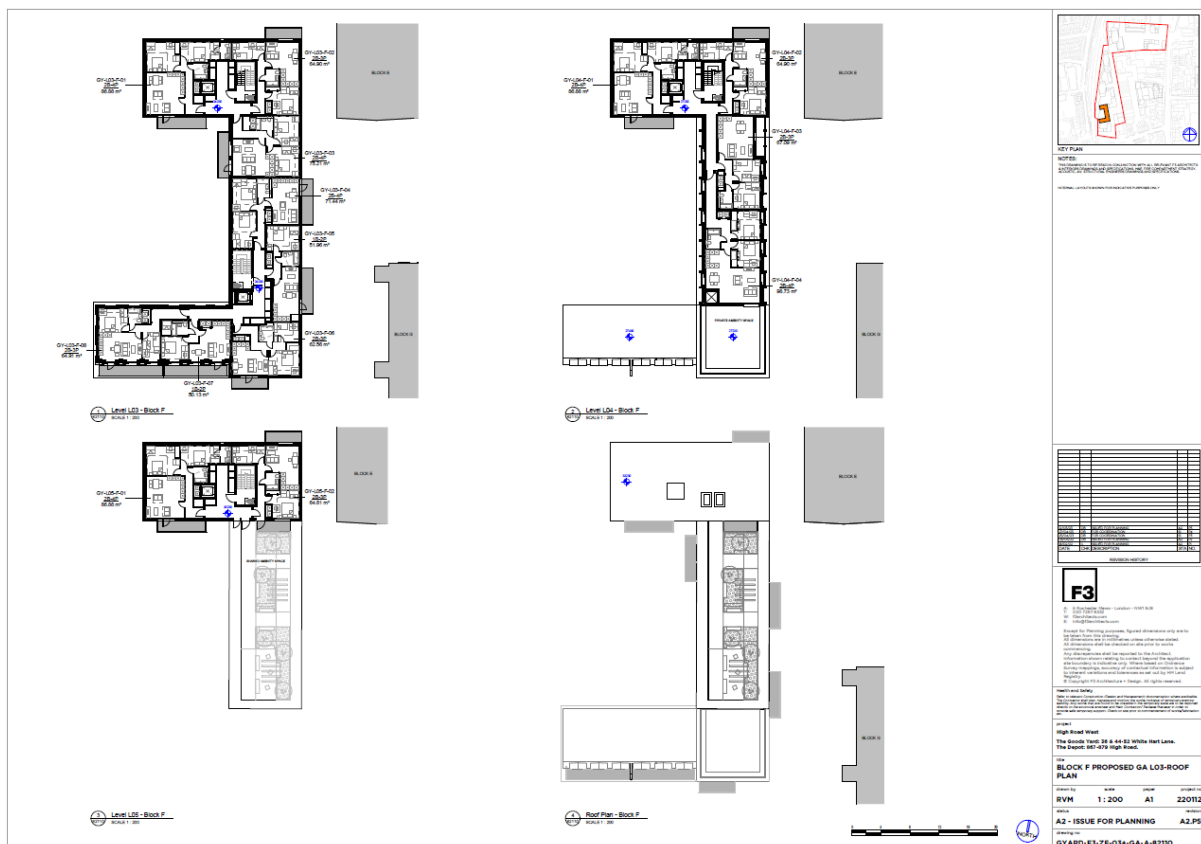
Proposed Goods Yard Zone 1 (North) Ground Floor Plan (Block A, B, C & D)



Proposed Goods Yard Zone 2 (South) Ground Floor Plan (Blocks D,E,F & G)

Proposed Goods Yard Basement Under Blocks A-D







Proposed Goods Yard Block F Materials Study



Proposed Site Wide Materials Section Looking West (White Hart Lane to South(left) & River Apartments to North (right)



TVIAVR View 5 – High Road, Next to Percy House (Proposed)



TVIAVR View 6 – Northumberland Park, East of High Road (Proposed)



TVIA AVR View 12 – Northern Pavement of Brantwood Road Taking in No.867-879 High Road (Proposed)



TVIA AVR View 24 Western Pavement of Love Lane, Outside White Hart Lane Station Looking North (Proposed)



TVIA AVR View 25 William Street, By White Hart Lane (Proposed)



TVIA AVR View 27 Durban Road



TVIAVR View 28 Pretoria Road and Commercial Road Junction (Proposed)

Appendix 2: Internal and External Consultee Representations

Stakeholder	Comment	Response
INTERNAL		
Building Control	I can advise that we have reviewed the revised design (26.08.2022) and can confirm that we view it as current code compliant and confirm that it would be an acceptable solution under the Building Regulations	The scheme has been updated to address the forthcoming changes to building regulations in relation to additional staircases in buildings over 30m in height. The proposed changes are positive and are in line with emerging legislation. The HSE have commented and are content with the proposals.
LBH Carbon Management	<p>Carbon Management Response 10/07/2023</p> <p>In preparing this consultation response, we have reviewed:</p> <ul style="list-style-type: none"> • Sustainability and Energy Statement prepared by Buro Happold (dated 19 May 2023 February 2022); including BREEAM tracker, Overheating Strategy, Whole Life-Cycle Carbon • Addendum to Sustainability and Energy Statement prepared by Buro Happold (dated 19 May 2023); • Block Compliance summary • Relevant supporting documents. <p>1. Summary</p> <p>Changes have been made to the scheme previously submitted under ref. HGY/2021/1771.</p> <p>For the Energy Strategy, Buro Happold has undertaken a remodelling exercise to align with Building Regulations Part L 2021 that has since been published, but not to reflect the design changes as the consultants felt the massing, orientation and façade design had not changed. Results for Block A have been used to reflect the remaining blocks in the proposed development.</p> <p>The residential element of the development now achieves a reduction of 78.7% carbon dioxide emissions on site from a baseline development calculated under Part L 2021. This compares to the design previously achieving a 80% reduction under a Part L 2013 baseline with SAP10 carbon factors, or a 64% reduction under a Part L 2013 baseline with SAP2012 carbon factors assuming the development would</p>	Noted, conditions and obligations attached.

connect to the DEN. The applicant has stated that the small difference in performance is due to the difference in how the DEN is modelled.

The non-residential element of the development now achieves a reduction of 42% carbon dioxide emissions on site from a baseline development calculated under Part L 2021. This compares to the design previously achieving a 58% reduction under a Part L 2013 baseline with SAP10 carbon factors, or a 64% reduction under a Part L 2013 baseline with SAP2012 carbon factors assuming the development would connect to the DEN. The applicant has stated that the small difference in performance is due to the difference in how the DEN is modelled.

Revised calculations were undertaken for the Whole Life-Cycle Assessment, now reporting a footprint of 867 kgCO₂e/m² (excluding Modules B6, B7 and D).

No changes have been made to the Overheating modelling, BREEAM Pre-Assessment or the Circular Economy Strategy.

1. Energy Strategy

Policy SP4 of the Local Plan Strategic Policies, requires all new development to be zero carbon (i.e. a 100% improvement beyond Part L (2021)). The London Plan (2021) further confirms this in Policy SI2.

The applicant has not set out the Energy Hierarchy in line with GLA guidance, nor have they submitted the required carbon emission spreadsheet to support the addendum. Values below are reported in kgCO₂/m²/year instead of tCO₂/year and therefore cannot be compared.

<i>Block A only (SAP10.2 emission factors)</i>		
	Total <u>residential</u> regulated emissions (kg CO₂ / year)	Total <u>non-residential</u> regulated emissions (kg CO₂ / year)
Part L 2021 baseline	11.6	24
Be Green	2.5	21
% savings	78.7%	42%

Compliance with Building Regulations:

- 8.56% pass from target to dwelling carbon emission energy rate
- 11.06% pass margin from target to dwelling fabric energy efficiency
- 0.19% pass margin from target to dwelling primary energy rate

Actions:

- Please submit the GLA's Carbon Emission Reporting Spreadsheet.

- Please submit an Energy Strategy for the proposed development (using the GLA's guidance: https://www.london.gov.uk/sites/default/files/gla_energy_assessment_guidance_april_2020.pdf)

Energy Use Intensity / Space Heating Demand

Applications are required to report on the total Energy Use Intensity and Space Heating Demand, in line with the GLA Energy Assessment Guidance (June 2022). The Energy Strategy should follow the reporting template set out in Table 5 of the guidance, including what methodology has been used. EUI is a measure of the total energy consumed annually, but should exclude on-site renewable energy generation and energy use from electric vehicle charging.

No calculations have been done to demonstrate compliance with this.

Actions:

- What is the calculated Energy Use Intensity (excluding renewable energy)? How does this perform against GLA benchmarks, i.e. at 35 and 55 kWh/m2/year? Please submit the information in line with the GLA's reporting template.
- What is the calculated space heating demand? How does this perform against the GLA benchmark of 15 kWh/m2/year? Please submit the information in line with the GLA's reporting template.

Energy – Lean

No detail has been submitted to demonstrate how the development performs under Be Lean. It is assumed that no fabric values have been changed.

Actions:

- Please submit the performance under Be Lean and demonstrate appropriate compliance.

Energy – Clean

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). Policy DM22 of the Development Management Document supports proposals that contribute to the provision and use of Decentralised Energy Network (DEN) infrastructure. It requires developments incorporating site-wide communal energy systems to examine opportunities to extend these systems beyond the site boundary to supply energy to neighbouring existing and planned future developments. It requires developments to prioritise connection to existing or planned future DENs.

The same principles have been followed for this revised design, including a connection to the Decentralised Energy Network (DEN). Energetik (the DEN provider) has indicated that the network may be available at the development site from 2025. No further detail has been submitted for Be Clean, it is assumed that all approved principles and assumptions will remain the same.

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.

No further detail has been submitted for Be Green, it is assumed that all approved principles and assumptions will remain the same.

Energy – Be Seen

London Plan Policy SI2 requests all developments to 'be seen', to monitor, verify and report on energy performance. The GLA requires all major development proposals to report on their modelled and measured operational energy performance. This will improve transparency on energy usage on sites, reduce the performance gap between modelled and measured energy use, and provide the applicant, building managers and occupants clarity on the performance of the building, equipment and renewable energy technologies.

It is not clear if the revised development has been registered on the Be Seen platform.

2. Carbon Offset Contribution

The residential floorspace across the development has been increased from 74,615 sqm to 77,790 sqm, which will increase the emissions required to offset. The applicant has estimated a carbon offset payment of £547,603 (residential) and £61,087 (non-residential) using the estimated carbon shortfall for Block A to the other blocks. No calculation has been provided so this cannot be verified. The applicant will need to resubmit full energy modelling prior to commencement of development that will take into account the full design changes across the whole development as part of the Energy Plan. The remaining carbon emissions will need to be offset at £95/tCO₂ over 30 years.

3. 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.

Building Regulations Part O came into force in June 2021. The applicant confirms that Part O requires some additional acoustic performance standards at night time, however no information has been provided whether any sample of dwellings has been remodelled along areas with higher noise pollution to demonstrate compliance. The applicant states that the façade design remains unchanged, therefore the results remain unchanged. It is the applicant's risk to ensure that their development is compliant with Building Regulations.

In the previous submission the mandatory DSY1 weather file for 2020s was passed, based on:

- Natural ventilation from 22°C, with 100% (bedroom) and 30% (LKD) of openable area at night
- Acoustic louvres for noise attenuated ventilation (30% free area)
- Ceiling fans
- Glazing g-values of 0.35 (low rise) and 0.60 (frosted glass)

- Vertical side fins (not clear where)
- MVHR with summer bypass
- No active cooling
- Heat gains of 350W (communal hallways) and 70W (apartment hallways) based on distribution losses of 10W/m
- Ventilation rate 1ACH (communal hallways)

Whole Life-Cycle Carbon Assessment

Policy SI2 requires developments referable to the Mayor of London to submit a Whole Life-Cycle Carbon Assessment and demonstrate actions undertaken to reduce life-cycle emissions.

The revised calculated emissions based on the GIA (without grid decarbonisation) is estimated at:

	Estimated carbon emissions	GLA benchmark RESIDENTIAL	Embodied carbon rating (Industry-wide)
Product & Construction Stages Modules A1-A5 (excl. sequestration)	569 kgCO ₂ e/m ² (increase from 557 kgCO ₂ e/m ²)	Meets GLA benchmark (<850 kgCO ₂ e/m ²) but misses the aspirational target (<500 kgCO ₂ e/m ²).	Modules A1-A5 achieve a band rating of 'D', not meeting the LETI 2020 Design Target.
Use and End-Of-Life Stages Modules B-C (excl. B6 and B7)	298 kgCO ₂ e/m ² (decrease from 304 kgCO ₂ e/m ²)	Meets GLA target (<350 kgCO ₂ e/m ²) and aspirational benchmark (<300 kgCO ₂ e/m ²).	
Modules A-C (excl B6, B7 and incl. sequestration)	867 kgCO ₂ e/m ²	Meets GLA target (<1200 kgCO ₂ e/m ²) but not the aspirational benchmark (<800 kgCO ₂ e/m ²).	Modules A1-B5, C1-4 (incl sequestration) achieve a letter band rating of 'D', not meeting the RIBA 2030 Design Target.
Use and End-Of-Life Stages Modules B6 and B7	1,005 kgCO ₂ e/m ²	N/A	
Reuse, Recovery, Recycling Stages Module D	-167 kgCO ₂ e/m ²	N/A	

Remodelling was undertaken following the design changes which has resulted in revised quantities of materials.

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.

No information has been provided for this, it is assumed the strategy remains unchanged.

4. Planning Obligations Heads of Terms

- Be Seen commitment to uploading energy data
- Energy Plan
- Sustainability Review
- Estimated carbon offset contribution (and associated obligations) of £608,690 (indicative), plus a 10% management fee; carbon offset contribution to be re-calculated at £2,850 per tCO₂ at the Energy Plan and Sustainability stages.
- DEN connection (and associated obligations)
- Heating strategy fall-back option if not connecting to the DEN

5. Planning Conditions

The conditions below have been drafted using the list of conditions from HGY/2021/1771, where they require amendments (with text underlined or struck through where the wording has been amended).

8)BREEAM

- a) Prior to commencement of any non-residential use with each relevant Phase (as identified in an approved Phasing Plan), a design stage accreditation certificate for that phase must be submitted to the Local Planning Authority confirming that the development will achieve a BREEAM “Very Good” outcome (or equivalent) for each non-residential use within that phase, aiming to achieve “Excellent”.
- b) The relevant Phase shall then be constructed in strict accordance with the approved details, shall achieve the agreed rating and shall be maintained as such thereafter for the lifetime of the development.
- c) Prior to occupation of any non-residential use within each relevant Phase, a post-construction certificate issued by the Building Research Establishment (or equivalent) for each non-residential use in that phase must be submitted to and approved in writing by the Local Planning Authority, confirming this standard has been achieved.
- d) In the event that any non-residential use fails to achieve the agreed rating, a full schedule and costings of remedial works required to achieve this rating shall be submitted to and approved in writing by the Local Planning Authority within 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 Local Planning Authority for off-site remedial actions.

21) **Energy Strategy**

(a) Prior to the commencement of works above ground floor slab level for a Block in a Phase (as identified in an approved Phasing Plan), an updated Energy Strategy for that phase must be submitted with complete Design Stage SAP worksheets based on the Sustainability and Energy Statement and Addendum (HRW-BHE-GD-XX-RP-YS-0001, Revision 00, dated 18 February 2022 and 19 May 2023). The development shall achieve minimum carbon emissions savings of 78% (residential) and 42% (non-residential) over 2013 2021 Building Regulations Part L, with a minimum solar PV array of 168 kWp on the Goods Yard part of the site and minimum 45 kWp on the Depot part of the site. The updated Strategy shall include:

- i. Explanation as to how the Development phase achieves minimum carbon reductions at the Be Lean Stage of 10% for the domestic new build and 15% for the non-domestic new build elements (~~SAP2012 carbon factors~~);
- ii. An air tightness delivery strategy;
- iii. Detailed thermal bridging calculations demonstrating how thermal bridging shall be reduced;
- ~~iv. Detailed design of the heat network within the Blocks and how this complies with CIBSE CoP1 and the LBH Generic Specification. This shall include detailed calculation of distribution losses (based on pipe routes and lengths, pipe sizes, taking account of F&R temperatures and diversification and insulation) to calculate total heat loss from the system expressed in W/dwelling and should demonstrate losses have been minimised;~~
- ~~v. A strategy for the supply of heat to any phases occupied before a connection is made to an off-site District Energy Network;~~
- ~~vi. A strategy that ensures heat can be supplied to the other sites within the High Road West masterplan area via this development site;~~
- ~~vii. Further detail of how the developer shall ensure the performance of the system will be safeguarded through later stages of design, construction and commissioning including provision of key information on system performance required by CoP1; and~~
- ~~viii. A metering strategy.~~

(b) Within six months of first occupation of any dwellings, evidence shall be submitted in writing to the Local Planning Authority that the development has been registered on the GLA's Be Seen energy monitoring platform.

(c) The final agreed Energy Strategy shall be operational prior to the first occupation of the

development. The development shall be carried out strictly in accordance with the approved details and shall be operated and maintained as such thereafter.

22) Overheating (Non-Residential)

- (a) Prior to the occupation of any non-residential floorspace in a relevant Phase (as identified in an approved Phasing Plan), an Overheating Report for that phase must be submitted to and approved in writing by the Local Planning Authority only if that space is to be occupied in accordance with the NCM Activity Database or will accommodate any vulnerable users, such as office/workspace, community, healthcare, or educational uses.
- (b) The report shall be based on the current and future weather files for 2020s, 2050s and 2080s for the CIBSE TM49 central London dataset. It shall set out:
- i. The proposed occupancy profiles and heat gains in line with CIBSE TM52.
 - ii. The modelled mitigation measures which will be delivered in line with the Cooling Hierarchy to ensure the development complies with DSY1 for the 2020s weather file.
 - iii. A retrofit plan that demonstrates which mitigation measures would be required to pass future weather files, with confirmation that the retrofit measures can be integrated within the design.
 - iv. The mitigation measures hereby approved shall be implemented prior to occupation and retained thereafter for the lifetime of the development.

23) Overheating (Residential)

(a) Prior to the above ground commencement of a Block in a Phase (as identified in an approved Phasing Plan), an updated Overheating Report shall be submitted to and approved by the Local Planning Authority. The submission shall assess the overheating risk, propose a retrofit plan, and re-consider the feasibility of installing external (movable) shading devices to the east, south and west facades. This assessment shall be based on the methodology following CIBSE TM59 with the London Weather Centre files as set out in the Sustainability and Energy Statement prepared by Buro Happold (HRW-BHE-GD-XX-RP-YS-0001, Revision 00, dated 18 February 2022 and 19 May 2023).

(b) Prior to occupation of a Block in a Phase (as identified in an approved Phasing Plan), the approved dwellings in that Block shall be built in accordance with the approved overheating measures in line with the Sustainability and Energy Statement prepared by Buro Happold (HRW-BHE-GD-XX-RP-YS-0001, Revision 00, dated 18 February 2022 and 19 May 2023) and retained thereafter for the lifetime of the development. This shall include:

- i. Natural ventilation, with 100% (bedroom) and 30% (LKD) of openable area at night;
- ii. Acoustic louvres for noise attenuated ventilation (30% free area);

	<p>iii. Ceiling fans;</p> <p>iv. Glazing g-values of 0.35 and 0.30;</p> <p>v. Vertical side fins;</p> <p>vi. MVHR with summer bypass; and</p> <p>vii. No active cooling; <u>and</u></p> <p>viii. <u>Any further mitigation measures as approved by or superseded by the latest approved Overheating Strategy.</u></p> <p>Conditions 19 (living roofs), 24 (Circular Economy), 25 (Whole Life Carbon), 26 (renewable energy), 27 (PV) remain unchanged.</p> <p>New condition (in part to replace requirements in Condition 21 (Energy Strategy) and to strengthen requirements for DEN connection):</p> <p>DEN Connection Prior to the above ground commencement of construction work, details relating to the future connection to the DEN must be submitted to and approved by the local planning authority. This shall include:</p> <ul style="list-style-type: none"> • Further detail of how the developer will ensure the performance of the DEN 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.); • A strategy for the supply of heat to any phases occupied before a connection is made to an off-site District Energy Network; • A strategy that ensures heat can be supplied to the other sites within the High Road West masterplan area via this development site; • Peak heat load calculations in accordance with CIBSE CP1 Heat Networks: Code of Practice for the UK (2020) taking account of diversification. • Detail of the pipe design, pipe sizes and lengths (taking account of flow and return temperatures and diversification), insulation and calculated heat loss from the pipes in Watts, demonstrating heat losses have been minimised together with analysis of stress/expansion; • A before and after floor plan showing how the plant room can accommodate a heat substation for future DEN connection. The heat substation shall be sized to meet the peak heat load of the site. The drawings should cover details of the phasing including any plant 	
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	<p>that needs to be removed or relocated and access routes for installation of the heat substation;</p> <ul style="list-style-type: none"> • Details of the route for the primary pipework from the energy centre to a point of connection at the site boundary including evidence that the point of connection is accessible by the area-wide DEN, detailed proposals for installation for the route that shall be coordinated with existing and services, and plans and sections showing the route for three 100mm diameter communications ducts; • Details of the location for building entry including dimensions, isolation points, coordination with existing services and detail of flushing/seals; • Details of the location for the set down of a temporary plant to provide heat to the development in case of an interruption to the DEN supply including confirmation that the structural load bearing of the temporary boiler location is adequate for the temporary plant and identify the area/route available for a flue; • Details of a future pipework route from the temporary boiler location to the plant room. <p>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.</p>	
Conservation Officer comments	<p><u>Introduction</u></p> <p>1. This Note is prepared on behalf of the Council in order to assist them in assessing heritage related impacts of the proposed development at The Goods Yard and The Depot 36 & 44-52 White Hart Lane (and land to the rear), and, 867-879, High Road (and land to the rear), London, N17 8EY. They are referred to as 'the Site' from here on.</p> <p>2. The current proposal is for: Full planning application for (i) the demolition of existing buildings and structures, site clearance and the redevelopment of the site for a residential-led, mixed-use development comprising residential units (C3); flexible commercial, business, community, retail and service uses (Class E); hard and soft landscaping; associated parking; and associated works. (ii) Change of use of No. 52 White Hart Lane from residential (C3) to a flexible retail (Class E) (iii) Change of use of No. 867-869 High Road to residential (C3) use.</p> <p>3. The Site benefits from three extant permissions, all of which are material considerations in the assessment of the current proposal, although none of them have been implemented.</p> <p><u>The Goods Yard, White Hart Lane: HGY/2018/0187</u></p> <p>4. The Planning Inspectorate allowed a hybrid planning application to deliver a residential led mixed-use scheme, delivering 316 homes across the 1.276ha site, with 1450m2 of non-</p>	<p>A low to moderate level of harm would arise to the North Tottenham Conservation Area. And a low level of harm would also arise to The Grange, 34 White Hart Lane, Grade II; Nos 797-799 High Road, Grade II; and, 819-821 High Road, Grade II.</p> <p>As per the NPPF paragraph 199, this harm has been afforded great weight. However, when the public benefits of the scheme are weighed in balance according to paragraph 200, clear and convincing</p>

	<p>residential uses. The proposal includes the refurbishment and conversion of the Station Master's House into a restaurant, and new neighbouring commercial building.</p> <p>5. In their appeal decision notice the Inspector noted that:</p> <p><i>"The height and modern appearance of the towers could appear incongruous in some views given that the area's character owes much to the survival of a rare near continuous frontage of 2 modest 18th and 19th Century buildings of 2-4 storeys. However, the impact would be mitigated by the proposed set back of the taller buildings from the frontages so that they would appear to belong to an area of different character beyond the Conservation Area. A similar effect can already be seen in the Brook House development north of the site. I consider that the impact of the towers proposed in the appeal scheme will be similar. Whilst some harm would still arise to the setting and heritage significance of the Conservation Area that would be less than substantial harm.</i></p> <p><i>Parts of the lower buildings on the appeal site could also appear above the rooflines of the frontage listed [The Grange (grade II)] and other buildings [Station Master's House (locally listed)] in some views from outside the Conservation Area including in views across White Hart Lane from Love Lane and William Street. They would be much closer to the buildings in the Conservation Area, but their lower height would result in a less dramatic contrast than would the towers. What effect these may have would depend on their final design, but they are also likely to result in some less than substantial harm to heritage significance by reason of their different bulk, scale and massing when compared to the modestly proportioned historic buildings on the frontage.</i></p> <p>6. He further considered the overall planning and heritage harm balance as required under the Framework and concluded that the public benefits would outweigh the less than substantial harm to the heritage assets.</p> <p>7. The Appeal scheme was allowed on 28th June 2019.</p> <p><u>The Depot (867-879 High Road) HGY/2019/2929</u></p> <p>8. Permission has been given for 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.</p>	<p>justification for the scheme is provided.</p>
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9. At the time, the Council's Conservation Officer concluded that:

"The proposed erection of new mixed-use block G and D is acceptable in principle depending on detailed design. The outline proposal for mixed-use blocks A, B, C, E does not allow to fully assess the heritage impact of these buildings on the settings of the heritage assets they will affect. From the submitted views, it is however evident that the scale, height and bulk of the proposed taller buildings A and B, especially the tower block B would dominate in the townscape within and around the conservation area.

This would affect the character and appearance of the conservation area and its heritage assets. Views of the conservation area's townscape and views of Grade II Listed Block F would be adversely impacted by the anomaly constituted by taller blocks A and B, however the intrinsic form and fabric of the heritage assets would not be affected, and the visually obtrusive new 3 buildings, whilst failing to preserve the settings of North Tottenham Conservation Area and the contributing setting of its heritage assets including Grade II listed properties at 867-869 High Road, would lead to less than substantial harm to their heritage significance.

The adverse impacts of the taller blocks on the settings of the heritage assets would be considerably mitigated by the enhancement of these settings through landscape design, laying out of public areas, by sensitively designed buildings G, D, by acceptably scaled block E and by the repairs and enhancements of the listed block F."

10. Permission was granted on 25th September 2020.

The Good Yard and the Depot [HGY/2021/1771] (Appeal ref: APP/ Y5420/W/21/32896901)

11. An application was submitted combining the two sites, both with extant permissions, for the redevelopment to deliver 867 new homes, 2,040sqm (GEA) of flexible supporting commercial uses and new public and private open spaces. This application was refused by the Council's Planning Committee on 8th November 2021. The refusal was appealed and was subject to a public inquiry during July 2022, after the submission of the current application under consideration. The appeal was allowed on 24th October 2022.

12. The Inspector, in their decision, noted that:

"I have found that the scheme would cause less than substantial harm to the North Tottenham Conservation Area, The Grange, 797-799 High Road and 819-821 High Road. With the exception of the Conservation Area where there would be a low to moderate level of less than

substantial harm, this would, in each case, be at the lower end of the scale.”

13. He further stated:

“I consider that the public benefits of the scheme clearly outweigh the above identified harm to designated heritage assets. The scheme complies with Paragraph 202 of the Framework and therefore, heritage does not form a clear reason for refusal for the purposes of Paragraph 11 d) i) of the Framework.”

14. This extant permission is the most recent one for the Site and is given material consideration in this assessment.

High Road West, HGY/2021/3175

15. An application relating to the wider master plan area for High Road West was approved by the Council's Planning Committee on 21st July 2022. This scheme would deliver:

- Up to 2,929 high-quality, sustainable homes, including 60 affordable homes in the detailed and 35% affordable homes, by unit, increasing up to 40% by unit subject to grant funding;
- Between 7,225 sqm (GIA) and 41,300 sqm (GIA) of commercial/ community floor space, including a new library and learning centre creating training, up-skilling and employment
- 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 33,300 sqm whereby safety and security is prioritised through well overlooked, lit and CCTV covered public realm

16. The scheme incorporates the previous extant permissions on Goods Yard [HGY/2018/0187] and The Depot [HGY/2019/2929].

Summary of Historic development

17. The High Road is the successor to Ermine Street, the Roman road from London to Lincoln and York. A settlement is recorded at Tottenham in the Domesday Survey of 1086, and a manor house existed by 1254, on or near the site of Bruce Castle. Known historically as Tottenham Street, the High Road was an important northern route into London, reflected in the number of inns that existed to service travellers. The linear settlement grew along the High Road and the village centre, as such, was marked by the adjacent Green and the High Cross, commemorating the medieval wayside cross that stood there.

18. By the 16th century Tottenham was a favoured rural retreat for city merchants, a number of

whom had mansions along the High Road, including the Black House, on the site of Northumberland Terrace, and Sir Abraham Reynardson's house in The Green. The High Road's development over the next two centuries reflects Tottenham's continuing attraction as a place of residence for wealthy Londoners. It also became noted for its schools, including several private boarding schools, and numerous charitable and religious foundations.

19. By 1844 the frontage from the parish boundary to White Hart Lane was densely built up. Back land developments of low-status terraces were emerging, notably around Love Lane and Church Road, probably housing workers at the lace factory, and Wagon Lane on the east side.

20. The advent of daily coach services to London in 1823, and omnibuses in 1839, made Tottenham attainable for less-affluent sectors of the middle class. A lace factory was built in 1810 in Love Lane, and a silk-factory five years later in Factory Lane to the east, which became a rubber mill in 1837. Brewing was established in the mid-19th century, but subsequent industry was limited and small scale.

21. The Northern & Eastern Railway, opened in 1840, promoted some eastward spread from the High Road, most notably Northumberland Park; by 1864 no fields bordered the High Road north of Tottenham Green. The opening of the Liverpool Street-Edmonton branch of the Great Eastern Railway in 1872, with reduced workmen's fares, instigated a development boom in 5 Tottenham, targeted mainly at the lower-middle and skilled working classes. By 1894 much of the hinterland of the High Road, particularly the west side, was developed with terraced housing, and by 1913 the land between the High Road and Tottenham Hale was extensively developed.

22. From the mid-19th century, the High Road's character was incrementally transformed as dwellings acquired ground-floor shops or were converted to other uses, purpose-built shopping parades appeared, and ancient hostelrys were rebuilt as modern pubs. By 1914 the street boasted the whole range of commercial and public buildings appropriate to a populous London suburb. A significant arrival was Tottenham Hotspur FC, which moved to its present site, a former plant nursery, in 1913. The outward spread of housing continued apace in the inter-war years; by the 1930s the fields, orchards and gardens between Tottenham and Wood Green had all but disappeared.

Emerging Context

23. Tottenham was identified in the London Plan and Haringey's Strategic Policies Local Plan (2013) as a key regeneration area within the capital capable of accommodating significant

growth. The area was identified as one of the most deprived areas of England with several challenges including unemployment, crime and overcrowded housing. The regeneration of the area was to target these socio-economic issues by creating a new world class destination in north London.

Heritage and Assets and Summary of Significance

24. Amongst the heritage assets, following were deemed crucial:

- North Tottenham Conservation Area
- The Grange, 34 White Hart Lane, Grade II
- Nos 797-799 High Road, Grade II
- 819-821 High Road, Grade II
- 867-869 High Road, Grade II
- Station Masters House, No 52 White Hart Lane (Locally Listed)

25. Their summarised significance are discussed in the following paragraphs.

North Tottenham Conservation Area

26. The North Tottenham Conservation Area includes a number of Georgian and Victorian buildings, some of which are listed and front the High Road and parts of White Hart Lane. A principal feature of the Conservation Area is the historic linear continuity of buildings either side of the High Road and the character of the townscape and its sense of spatial sequence highlighted by the mix of Victorian and Georgian buildings that help to give the street its scale and sense of place.

The Grange, 34 White Hart Lane, Grade II

27. This is a group of buildings with Nos 32 and 34a to its either side, and form a prominent group along the north side of White Hart Lane. They represent one of the earliest developments within the area, and have both architectural and historic significance; the former derived from the building's period and detailing, and the later from its period of construction and survival.

28. As a group of buildings, the Grange remains prominent on the north side of White Hart Lane. The homogeneity of the domestic scale and materials form a strong group with other buildings to its east. To the west, however, this sense of uniformity and tight street frontage is entirely lost. Although the western elevation was always open, the ancillary activities to the rear have continued to give visual and functional prominence to the building. This hierarchy in the scale

	<p>and function, between front and back, is an important part of the building's setting and contributes positively to its significance.</p> <p>797-799 High Road, Grade II</p> <p>29. These constitute an early 18th Century pair of former houses, part of a varied mix of domestic buildings along the northern section of the High Road. These form a group and are representative of the Georgian period of the area's development.</p> <p>30. The buildings are considered to be of high significance, both pertaining to their own interest and the contribution they make to the conservation area. Like most High Streets (or equivalent) there is a definite hierarchy between activities and uses, with those along the frontage being more prominent and the rear more ancillary.</p> <p>819-821 High Road, Grade II</p> <p>31. These are also an early 18th Century pair of houses with alterations with 19th century shop fronts. They form a group with the domestic buildings of same period and architectural features. In particular, the symmetrically arranged pair evidences the slightly higher quality houses displaying the formality, stature, and proportions typical of the Georgian era of the area's development.</p> <p>32. The building's location at the intersection with Northumberland Park allows them to be viewed and appreciated when approaching from the east. Long distance axial views, terminating at the buildings and the heavily trafficked High Road hint at the approaching abrupt change in the character from a quiet residential street to a busy thoroughfare.</p> <p>33. The buildings are considered to be of high significance, both pertaining to their own interest and the contribution they make to the conservation area. The buildings' symmetrical façade make them an attractive pair that actually stands out pleasantly within the western part of the High Road. As with No 797-799, their function and appearance follow the established hierarchy of activities along the High Road, with the rear remaining ancillary.</p> <p>867-869 High Road, Grade II</p> <p>34. This is a pair of early 18th Century houses, with three storeys and basement. The houses have high pitched roofs making them prominent of the street. As the northernmost buildings on the west of the High Road, Nos. 867 and 869, form an attractive and prominent pair of 18th</p>	
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century properties of three storeys plus basement.

35. Its position in the High Road, at the northern end, gives it prominence, terminating views of the High Road from south. It is also a key building when viewed from the north, entering into the borough from Enfield. The building alongside the High Road form a harmonious composition and group that provide townscape value of high quality. Overall, it is considered to have high architectural interest. It also has high townscape and group value.

No 52 White Hart Lane, The Station Master's House (locally listed)

36. No. 52, a detached two-storey house built as the Station Master's house following the opening of White Hart Lane station in 1872. The house appears to be in good condition, in yellow stock brick with gauged brick flat arches over the sash windows and a slate roof. The high stock-brick wall on the frontage also appears to be original.

37. The building has architectural and historic significance as a surviving example of railway based domestic development, alongside the wider historic development of Tottenham.

Current Proposal

38. The current proposal is for a similar development, approved by the Planning Inspector in 2022. The main changes pertain to the material palette as raised by the Inspector in the most recent appeal scheme [APP/ Y5420/W/21/32896901], and additional alterations to address concerns of fire safety. These include:

- An increase in building envelope to accommodate the additional stair cores. Where an increase is necessary, this is importantly consistent with (and within) the building envelopes consented by the Appeal Scheme.
- Inclusion of an additional storey (and shoulder storey) to the Goods Yard south tower, to improve overall tower composition.
- Moving The Depot tower further away from Rivers Apartments to its north by c. 1m.
- Reconfiguration and enlargement of basement to accommodate additional lift and stair core requirements. All parking is now provided at basement level.
- Minor changes to the overall residential unit mix, but with the overall number of residential homes remaining unchanged at 844. A fast-track, policy compliant level of affordable housing would continue to be provided as explained further below. 8
- A subtle reworking of the facades including use of a slightly lighter tone of materials, but importantly retaining the design principles of the Appeal Scheme.

- Minor consequential changes to landscaping to align with the above.

Heritage Impact Assessment

39. The heritage impact assessment has been undertaken in accordance with the NPPF policies 189-201 alongside relevant guidance contained within the PPG and Historic England publications. In particular, to assess the impact of the development on the setting of the asset, the following has been applied:

- Historic England Guidance as set out in GPA 3: The Setting of Heritage Assets (2017) requires assessing the effects of the proposed development on significance through generating change within the settings of these heritage assets, in visual, experiential and interpretative terms.

40. The proposal is not considered to materially different from that allowed by the Inspector in October 2022. The overall impact of the proposal is therefore considered to be the same, with minor improvement in terms of the materiality and façade, an issue raised by the Council and accepted by the Inspector.

41. Similar to the previous proposal and as concluded by the Planning Inspector, the towers, by virtue of their height, breadth and massing would result in an abrupt change in scale compared with the prevailing local townscape and that this would have an incongruous effect in a number of views and would diminish the spacious and modest character of the surrounding area. Whilst the minor revision in the palette would help in further articulating the façade, their impact on the identified heritage assets would remain similar.

42. As a result, a low level of less than substantial harm would arise to

- The Grange, 34 White Hart Lane, Grade II
- Nos 797-799 High Road, Grade II
- 819-821 High Road, Grade II

43. A low to moderate level of harm would arise to North Tottenham Conservation Area.

44. Given the improvement to their settings, the proposal will have a neutral impact on Nos 867-869 High Road (Grade II) and the locally listed Station Master's House at 52 White Hart Lane.

45. In accordance with paragraphs 189-190 of the NPPF 2019, the proposal would cause a low level of less than substantial harm to Nos 797- 799 High Road, 819-821 High Road and The

	<p>Grange, 34 White Hart Lane. A low to moderate level of less than substantial harm would to the North Tottenham Conservation Area. In accordance with Paragraph 199 of the framework, great 9 weight should be afforded to this harm. This harm should be weighed against any public benefits as per Paragraph 200 of the framework.</p> <p><u>Conclusion</u></p> <p>46. The scheme is a revision from a previous scheme, allowed by the Planning Inspector. Most of the alterations are minor and pertain to the latest health and safety requirements, including the need for a second stair core for any building higher than 30m as per Mayor's policies.</p> <p>47. The proposal has been re-assessed considering the Planning Inspector's decision and it is concluded that a low to moderate level of harm would arise to North Tottenham Conservation Area. A low level of harm would also arise to The Grange, 34 White Hart Lane, Grade II; Nos 797-799 High Road, Grade II; and, 819-821 High Road, Grade II.</p> <p>48. As per the NPPF paragraph 199, this harm should be afforded great weight and public benefits should be weighed in balance according to paragraph 200.</p>	
LBH Design Officer comments	<p><u>Summary</u></p> <p>These proposals are refinements of a previous scheme refused by the council and subsequently approved by the government appointed planning inspector at an appeal, itself an elaboration on two previous approved schemes, based on an adopted masterplan. They represent a well thought through and elegantly designed response to a significant site. The masterplan and layout of this proposal represents an improvement on the existing adopted masterplan, with a clear, legible street network and an enlarged park. It also improves on the approved hybrid schemes for each of the individual Goods Yard and Depot sites, particularly the former, and on the earlier version of this combined scheme refused by the council & subsequently approved by government inspectors, on appeal.</p> <p>The proposed street layout is particularly improved over the original Goods Yard scheme, where the single sided street proposed in both adopted masterplan and that approval to run alongside the railway edge is moved into the site, with a more legible, direct and welcoming entrance off White Hart Lane and the potential for active frontage along both sides. Streets within the development are lined with good quality, well designed low and medium rise mansion blocks providing an appropriate transition from the retained existing buildings along the High Road and White Hart Lane to the taller blocks.</p>	Support noted.

The proposed mix of heights include three tall building at 27, 32 and 29 storeys, the same height as the scheme approved at appeal; whilst the northernmost tower, The Depot Tower, is moved to the south and west so that is less close to the neighbouring existing high-rise residential block than the scheme approved on appeal. This is successfully justified in accordance with Haringey policy.

In particular, the detailed design of the three towers represent a tremendous improvement on the illustrative schemes in the previous hybrid approvals and previous combined scheme approved at appeal. They are legible and sculpturally interesting in longer views, connect well to the ground and their entrances whilst having clear separate base, middle and top and enclose good quality homes, in all cases somewhat more so than the previous scheme. 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, be in accordance with the previously approved masterplan.

All the Quality Review Panel (QRP) concerns raised with the proposals have been successfully resolved. Communal entrance doors are all now designed to be clear, legible and inviting, all flats have good aspects, outlooks and private amenity spaces, with balconies or terraces always available off living rooms and designed to provide privacy and hide residents' clutter. The proposals have also been successfully shown to not have any significant detrimental effect on existing neighbours, considering that this has long been planned for major change, with the High Road West Masterplan Framework developed in 2014, and are further off-set than the scheme approved on appeal. Daylight, sunlight and wind assessments show only minor effects compared to the expectation of development previously agreed.

Principal of Development, Masterplanning and Street Layout

1. Notwithstanding the weight of council policy emphasising that only comprehensive development of the whole of this allocation site is sought, this application builds on three previous approvals; for the Goods Yard site, (what is now known as) The Depot site, which together cover the whole of this application site, and the previous combined scheme approved at appeal. The planning inspector who granted the appeal on the Goods Yard site concluded that as proposals were in accordance with the adopted Masterplan Framework, and the Council took the same view on the subsequent application for the 867-879 High Road, now known in this application as "The Depot".
2. This proposal, therefore, in amending those two earlier previous approvals, like the scheme approved at appeal, takes the proposals closer to the principle of masterplanning, tying the two sites more closely together in street pattern and building form, particularly in the heights of the taller buildings.

3. These proposals, like the appeal scheme, particularly improve on the previous approvals and the existing adopted masterplan in the street layout of the Goods Yard element, by moving the main north-south street of this part of the development away from the western boundary, where it was to run alongside the railway edge, creating a one-sided street lacking the usual animation. This allows the buildings, including the taller blocks, to be moved up to the railway edge, buffering the railway noise more completely from the rest of the wider development site. Being next to the railway and its wooded embankments, the tall buildings have less impact on sensitive neighbours. It also matches the arrangement in both the approval on the Depot site but also the built Cannon Works site immediately to the north with their tallest buildings against the railway edge.
4. The new main north south street of the Goods Yard element is now proposed to run along the eastern edge of the applicants' site, on the western boundary of the Peacock Industrial Estate, in different ownership but also part of the site allocation and adopted masterplan, so therefore also expected to be redeveloped in the short term. To demonstrate this is possible and viable, the applicants include a masterplan showing how the Peacock site could be redeveloped with blocks of similar height. The applicants have committed to permit blocks on the Peacock to open off this new north-south street. Whilst in the short term this development, if built before anything on the Peacock, would have residential and commercial properties on the west side of this street facing the blank back wall of the Peacock, it can be expected soon to become a two-sided street with active frontage and front doors on both sides. This new north-south street also connects better at either end, via small squares to resolve the alignment; at the southern end the small square allows the small dogleg to the west, onto a direct street off White Hart Lane between the two buildings of heritage, The Grange and Station Masters House. At the northern end a second small square allows a short east-west street, hard against the northern boundary of the Peacock, to link into the park proposed in the masterplan and approved layout of The Depot.
5. The street layout of The Depot is essentially unchanged, with its primary connection being to the High Road as a continuation of Brantwood Road, forming a crossroads. Streets continue to connect to the Cannons site to the north at the north-eastern and north-western corners of the park. The masterplan in this application shows the east-west street at the northern edge of the Peacock site could be continued directly eastwards through to the High Road via another part of the site allocation likely to be redeveloped, currently a timber yard, whilst two further east-west streets on their masterplan would connect the southern square and the pocket park / entrance court to their southern tall building with the two existing narrow alleys off the High Road; Percival Court and Brunswick Square. The potential for the park to be directly connected to White Hart Lane via a second north-south street to the east of The Grange remains on the masterplan but is also outside this applicants' ownership.
6. Whilst the key north-south street of the development contains two doglegs, preventing it being the *ideal* direct route, this layout aligns well with land ownership and creates

developable plots both within this applicants' ownership and on the rest of the site allocation. It is also a more direct and less convoluted north-south route than in the adopted masterplan and approved scheme for the Goods Yard. At the northern end, on The Depot, the direct connection of that site's main east-west street with the desired landing point of a footbridge over the railway becomes somewhat less direct, with the applicants' provision for the bridge instead landing in their northern square. The desire for a bridge is only an aspiration, but if delivered within this application's masterplan, the east-west connection would be *marginally* less direct, but the connection south-eastwards would be improved. Until the bridge can be delivered, this layout removes the dead-end element of the east-west street in The Depot. As a whole, this application represents a considerably improved street layout than the two separate schemes, in a logical and coherent masterplan, consistent to the *spirit* of the adopted masterplan.

Form, Bulk & Massing

7. Across the site, bulk and massing increases with height from the smallest, most fine grained and lowest rise buildings on the High Road at the eastern end of the Depot site and the southern end of the Goods Yard site, where in both cases retained existing buildings of significant heritage value face the main existing streets of the High Road and White Hart Lane, to the most dominant bulk of the highest rise blocks, embedded into podia and lower rise shoulder wings tying them into the wider grain, within this application site and the masterplan, of mansion blocks lining the streets and squares of the development. These mansion blocks rise from three and four storeys immediately beside and behind the retained buildings on White Hart Lane and the High Road to five, six and seven storeys, with Depot Block B, which forms a shoulder to the northern tower on the western edge of the park, rising to 9 storeys. This is a very reasonable range of heights for the proposed low to medium rise elements of the proposal.
8. That the tallest lower block, Block B of The Depot, is facing the park, a reasonable proposition, having a large open space in front. It suggests, as is shown in their masterplan, higher buildings on the west side of the park, with 6 storeys on the east side. This suggests the park will have the best sun in the morning and early afternoon but creates more viable potential development on the main remaining neighbouring site, the Peacock Estate, despite the remaining sites not being suitable for tall buildings, 9 storeys being the absolute maximum height accepted anywhere else within the site allocation north of White Hart Lane.
9. In form, these lower rise elements line the proposed streets squares and park, defining street edges and corners, in a block pattern, but avoid continuous walls of buildings by leaving gaps between, creating glimpses into courtyards and podium gardens. This allows better day and sunlight access to streets, squares and courtyards, and allows intriguing glimpses, and breathing space to retained existing buildings, notwithstanding that these gaps are gated where they are not podia, preserving clear definition of public and private space. In

	<p>form, bulk and massing of the lower storey elements, the QRP considered the proposals to be broadly acceptable.</p> <p><u>Tall Buildings, especially Height, Form and Composition</u></p> <p>10. Three tall buildings are proposed, of 27, 32 and 29 storeys, the same height as those in the scheme approved on appeal, and are arranged from south to north, along the western (railway) edge of the site. Here the railway sits on an embankment, wooded on both sides, and the building blocks, containing the tall buildings, are set back from the boundary to allow a landscaped strip, so that the nearest existing houses west of the railway are over 40m away and separated by the embankment and its trees.</p> <p>11. The three tall buildings will form a row, with the existing River Apartments tower just to the north forming a fourth. The plan of each tower is strongly aligned north-south, around 40m wide (north-south), but under 20m deep (east-west), with the formerly widest central tower reduced by a further 3m in plan width compared to the refused scheme. Their plans are also chamfered, to accentuate their slenderness from the north and south, and the north (Depot) tower has been moved 2m west and 1.5m south compared to the appeal scheme, further away from Rivers Apartments. The gaps between each, including to Rivers Apartments, south to north, are 33m, 23m & 33m.</p> <p>12. The applicants have been able to show this avoids “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.</p> <p>13. From the east and west, the row of 4 towers form a “double curve” formed by each tall building having taller and slightly lower elements forming a “top” or crown and “shoulders” of slightly different heights, formed by each tower’s northern and southern “cloaks” where their width expands below their crowns. These curves inscribe a rise from White Hart Lane, through the southern tower (Goods Yard Block B, through the tallest tower (Goods Yard Block A), the slightly lower third tower (Depot Block A), to Rivers Apartments.</p> <p>14. The crowns in each tower have been made slenderer since the appeal scheme, to reduce the mass at high level and increase the sky gap in distant views. A further subtle change has raised the lower, southern shoulder to improve perception of height and proportion. Changes to vertical core materiality & expression through reduction of vertical elements & lighter colour tone applied to all the core and crowns of all three towers further visibly lighten the tall buildings, especially their crowns.</p> <p>15. Considering each criterion from Haringey’s tall building policy is set in SP11 of our Strategic Policies DPD (adopted 2013 (with alterations 2017) and DM6 of our Development</p>	
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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 suggested heights could increase, and that it would not be out of place for the row of towers to rise higher in the second and third towers and then drop away;
- 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 40-70m, with the broad, wooded embankments providing further buffering between the two areas;
- High quality design especially of public realm is considered above in paras. 1-9, the protection of views below in paras. 20-22. Heritage assets and their settings are covered by the Conservation Officer's comments;
- The tall buildings will be capable of being considered "Landmarks" by being wayfinders or markers within the masterplan, 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 will also be capable of being considered a "Landmark" by being elegant, well-proportioned and visually interesting when viewed from any direction, following improvements to their design since the appeal, as discussed above and below;
- Consideration of impact on ecology and microclimate encompasses daylight, sunlight and wind, examined in detail from para. 28 onwards, which explain the impact is not significant. 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, which this is not;

	<ul style="list-style-type: none"> • The proposed tall buildings will be in <i>some</i> proximity to the built River Apartments, but this is by design to produce an intended effect of a row of tall buildings and has been increased in this proposal compared to the appeal scheme. They will be sufficiently far apart though, at 33m, 23m & 33m, from each other and Rivers Apartments, and are slenderer 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; • And the urban design analysis and 3d model views of their proposal satisfactorily shows that the towers could be a successful and elegant landmark, creating the planned row of tall buildings. <p>16. The detailed design of the three towers has undergone extensive revision and refinement, in conjunction with numerous workshops with Officers, during the course of this application and the previous (appealed) application. The principal concept for the composition of the proposed towers was of a core and two cloaks of contrasting materials, colours and fenestration, so that when viewed from the east and west, where they would be at their broadest, each tower would take on the appearance of three slender elements rather than one fat element. The two cloaks would also start higher, only from above the podium and/or shoulder blocks, and finish lower than the core; the core would then form a distinctive base and top, contrasting with the cloaks' middle. Aligning the entrance with the core in some instances further demarcates and celebrates their entrances, and the differences in height, of 2-4 storeys, echoes the single storey difference in height of the different elements of River Apartments in the "curve" mentioned above.</p> <p>17. For the design to be successfully "read" in more distant views, there has to be a significant contrast between the cloaks and core. However, it would not be desirable for the proposals to consist of too many sharply contrasting, discordantly differently coloured and garish elements. The initial proposal was for each tower to be in a sharply contrasting, different colour; in terracotta orange, a vivid green and rich blue, from south to north, with the cores in each tower white. The colours would come from glazed ceramic cladding, in complex moulded forms creating a finely detailed frame. This could look spectacular close-to, but in the design of tall buildings, more distant views are more relevant, as they are more likely to be experienced.</p> <p>18. Therefore, the detailed design and colours of the proposed cladding and the patterns of the proposed fenestration have been significantly amended to much better express the intended composition. The ceramic areas of cladding have been simplified and broadened out to create a greater expanse of colour to contrast more with the framed, skeletal form of the core, and the colours have been simplified so each tower has a similar tone of terracotta to contrast with the white-grey core, and the base of the cloaks have been raised slightly above the plinths/shoulders to create a shadow gap. The effect is that they are a family of towers, in complimentary earthy tones, made up of sharply contrasting core and cloaks that</p>	
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accentuate their slenderness and disguise their broadness, and read clearly in more distant views, with a clearly distinguishable base, middle and top, entrance, body and crown.

19. Therefore, the proposed tall buildings are considered appropriate in this location, legible as landmarks and as part of a wider composition, striking and distinctive in design, in support of meaningful aspects of the design and of high-quality architectural design capable of being seen as beautiful.

Local, Wider & Strategic Views

20. London and Borough Strategic View Corridors all happen to be distant from this development, and therefore are not considered to be affected by this development.
21. A series of 31 locations for Local and Wider Views of the proposal were agreed between Council Officers and the Applicants team early in the pre-application process. The applicants have included updated images of all the views showing the scene now, the view with just this scheme added, the view also with other approved schemes (the Tottenham Hotspur Stadium and associated developments) and the view also with the adopted masterplan, and even of other neighbouring developments on the drawing board (the Lendlease “High Road West” scheme). These have all been updated with the amendments made in this application compared to the recently appealed application and are clear demonstrating the benefits from the changes in this application compared to the refused scheme.
22. In particular, it also needs to be borne in mind that the three previous applications approved for this site included tall buildings; for the Goods Yard not to this height but to the same height for 867-879, now known as The Depot, and the earlier combined scheme, and these were assessed as part of those applications and found acceptable (in the latter case by the inspector at an appeal). It is therefore relevant to compare the views of this proposal with views of already approved proposals for this site,
23. The views demonstrate that this proposal would not be visible in many sensitive views, and in those where it would be visible, the three new towers would be seen alongside the existing River Apartments tower, and/or the other approved towers would already be visible. In general, their impact would therefore not be detrimental to views where other taller buildings can already be seen, except that it would help turn those into a coherent row of tall buildings, fulfilling the wayfinder or marker function mentioned as one of the advantages of the proposal noted above.

Residential Quality (flat, room & private amenity space shape, size, quality and aspect)

24. All maisonette, flat and room sizes are designed to comply with or exceed minima defined in the Nationally Described Space Standards. This is as is to be routinely expected.
25. All dwellings (excepting flats converted from the listed nos. 867 & 869 High Road, as previously approved) meet or exceed the private external amenity space in the London Plan,

with private gardens, balconies or roof terraces. Privacy of amenity space is achieved by most balconies being recessed, and those that are not being at least partially solid balustraded. All flats have balconies off their living rooms, although some also have second balconies off a bedroom. Many flats have larger roof terraces, exploiting the design which permits roof terraces in the steps, on the roofs of shoulders or on podia.

26. There are no single aspect north facing flat in the whole proposed development. There would be some single aspect south facing one bedroom flats, but no south facing larger single aspect flats; this is a reasonable outcome for a higher density urban scheme where some of the blocks are inevitably aligned to an east-west street, and they are designed with passive solar shading and natural ventilation showing in the applicants' assessment they would not suffer overheating. All other flats and maisonettes are at least dual aspect, many triple aspect, an exemplary achievement in such a high density urban development.
27. There is also access to doorstep private communal amenity space, including doorstep playspace, within the development. Many blocks benefit from a private roof terrace, set-in from the sides and screened from neighbouring existing dwellings but providing a large area of amenity space, including an area with informal play equipment. The development has access to the central park, which will also contain older childrens' play, large lawns, seating and planting.

Daylight, Sunlight and Wind Microclimate

28. The applicants provided updated 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" (Littlefair), known as "The BRE Guide". Since the applicants' previous schemes, a significantly updated BRE Guide has been prepared; the 3rd edition (2022), replacing the 2nd edition of 2011. For this application the proposals have been assessed using the new methodologies of the new BRE Guide as well as under the old methodologies (where they have changed), to enable comparison.
29. Their assessment finds reasonable levels of daylight and good levels of sunlight achieved throughout the detailed parts of the proposed development. For daylight, the applicants' consultants tested all of the habitable rooms to all of the dwellings on the lowest floor of every proposed block (304 rooms) and a typical floor in the upper parts of the three tall blocks (61 rooms). This found that 192 of the rooms tested (48%) met the definition of good daylight levels in the 2022 BRE Guide; extrapolated for the total dwellings across the development, including the untested majority on upper floors, 68% should receive good daylight. It should be noted that this assumes the strictest criteria of illuminance levels of 200lux for Living-Dining-Kitchens; where the more reasonable recommended level for Living Rooms, 150lux,

	<p>often known as “alternative target values”, is applied, 211 rooms (53%) meet the definition of good daylight.</p> <p>30. When the scheme that was subsequently refused by the council, only to be approved by the inspector on appeal, was assessed, under the now-withdrawn 2011 BRE Guide, 81 and 80% of habitable rooms (177 out of 220 & 176 of 220 rooms) met the daylight levels recommended for average daylight factor (ADF) and daylight distribution respectively. Those that fell short all fell marginally short, by a few fractions of a percent, for instance with all Living/Dining/Kitchens that do not meet the strict 2% recommended ADF for kitchens achieving 1.5% which is the recommendation for living rooms. However, testing this proposal according to the superseded 2011 guide finds that 61% of habitable rooms would pass the strict test and 71% pass the more reasonable one.</p> <p>31. 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, commenting on the 2011 Guide, the 27% VSC recommended 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, and for an unavoidably high-density development such as this, in one of Haringey’s most important growth areas, with significant amounts of new outdoor amenity space included along with major new social infrastructure and town centre attractions on the doorstep of the proposed new dwellings, these levels of daylight should be considered acceptable.</p> <p>32. For sunlight, much better results were achieved, with 103 of 123 dwellings assessed (83%) achieving the 2022 BRE Guide recommended sunlight levels., which can be considered an excellent result given that the scheme was essentially designed before the update to the guide. The main change between the 2011 and 2022 Guides on sunlight is that the latter only asked that living rooms facing within 90° of due south achieve the recommended sunlight levels, whereas the new version asks for that for one habitable room in all dwellings. Previously, 89% of living rooms (57 out of 64) met sunlight levels, before these latest and neighbouring design changes.</p> <p>33. There is no assessment on neighbours as there is no change likely to existing residential neighbours that will be different to the approved schemes. This is because the only close neighbours are the housing on the former Canon Rubber Factory site, including Rivers Apartments, which are immediately to the north of the parts of The Depot site that are only better than the approved scheme.</p>	
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	<p>34. 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 significant downdrafts and tunnelling of wind along the ground at the northern square, the north-west corner of the park and close to Rivers Apartments. The applicants have therefore designed their landscaping plans to include a substantial area of landscaping at these locations, that would mitigate this downdraft effect, and allow safe conditions in building entrances and pedestrian areas.</p>	
LBH Carbon Management - Pollution	<p><u>Re: Planning Application HGY/2022/0563 at The Goods Yard and The Depot 36 & 44-52 White Hart Lane and 867-879 High Road N17 8EY</u></p> <p>Thanks for contacting the Carbon Management Team (Pollution) regarding the above planning application for the full planning application for (i) the demolition of existing buildings and structures, site clearance and the redevelopment of the site for a residential-led, mixed-use development comprising residential units (C3); flexible commercial, business, community, retail and service uses (Class E); hard and soft landscaping; associated parking; and associated works. (ii) Change of use of No. 52 White Hart Lane from residential (C3) to a flexible retail (Class E) (iii) Change of use of No. 867-869 High Road to residential (C3) use and I will like to comment as follows.</p> <p>Having considered all the supportive information especially the Site Construction Management Plan prepared by Arcadis dated February 2022, Environmental Statement Volume 1 prepared by Quod with reference Q200705 dated February 2022, Environmental Statement: Non – Technical Summary prepared by Quod dated February 2022, Design and Access Statement dated February 2022, Land Contamination Assessment (Phase I) with reference HRW-BHE-GD-XX-RP-CG-002 Revision P00 prepared by Buro Happold Ltd dated 18th February 2022 taken note of sections 6 (Preliminary Geo-environmental Risk Assessment) and 7 (Conclusions & Recommendations), Sustainability and Energy Statement with reference HRW – BHE – GD – XX – RP – YS – 0001 Revision P00 dated 18th February 2022 taken note of the proposed installation of PV, Air Quality Positive Statement with reference HRW – BHE – GD – XX – RP – YI – 0001 prepared by Buro Happold Ltd dated 17th February 2022, the Air Quality Assessment Report with reference HRW – BHE – GD – XX – RP – YI – 002 prepared by Buro Happold Ltd dated 17th February 2022 taken note of sections 6 (Mitigation Measures) and 7 (Conclusions), Environmental Statement Addendum Addendum with reference Q200705 prepared by Quod dated May 2023 which explained assessment of potential implications of the ‘amended scheme’ and an additional cumulative assessment of the amended scheme as well as the update to Land Contamination Assessment (Phase I) with reference HRW-BHE-GD-XX-RP-CG-002 prepared</p>	Conditions and heads of terms recommended.

by Buro Happold Ltd dated 18th May 2023 taken note of sections 6 (Preliminary Geo-environmental Risk Assessment) and 7 (Conclusions and Recommendations) which stated there is no changes to February 2022 report, **please be advise that we have no objection to the proposed amended development scheme but the following planning conditions are recommend should planning permission be granted.**

1. Land Contamination

Before development commences other than for investigative work:

- a. Using the information already submitted in update to Land Contamination Assessment (Phase I) with reference HRW-BHE-GD-XX-RP-CG-002 prepared by Buro Happold Ltd dated 18th May 2023, an intrusive site investigation shall be conducted for the site using information obtained from the desktop study and Conceptual Model. The site investigation must be comprehensive enough to enable; a risk assessment to be undertaken, refinement of the Conceptual Model, and the development of a Method Statement detailing the remediation requirements.
- 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 carried out on site.
- c. Where remediation of contamination on the site is required, completion of the remediation detailed 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.

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

2. Unexpected Contamination

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 as approved.

Reasons: 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 development site in line with paragraph 109 of the National Planning Policy Framework.

3. NRMM

- 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 NO_x and PM. No works shall be carried out on site until all Non-Road Mobile Machinery (NRMM) and plant to be used on the site of net power between 37kW and 560 kW has been registered at <http://nrmm.london/>. Proof of registration must be submitted to the Local Planning Authority prior to the commencement of any works on site.
- b.** An inventory of all NRMM must be kept on site during the course of the demolitions, site preparation and construction phases. All machinery should be regularly serviced and service logs kept on site for inspection. Records should be kept on site which details proof of emission limits for all equipment. This documentation should be made available to local authority officers as required until development completion.

Reason: To protect local air quality and comply with Policy 7.14 of the London Plan and the GLA NRMM LEZ

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 planning authority 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 limited to 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 (July 2017) and shall provide details on:

- i. Monitoring and joint working arrangements, where appropriate;
- ii. Site access and car parking arrangements;
- 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 of facilities 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 the event of Local Authority Inspection;
- iv. An inventory of NRMM currently on site (machinery should be regularly serviced, and service logs kept on 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 submitted Site Construction Management Plan which can form part of the information to be consider for the discharge

	<p>of the attached Demolition/Construction Environmental Management Plans condition.</p> <p>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.</p> <p><u>Reason:</u> To safeguard residential amenity, reduce congestion and mitigate obstruction to the flow of traffic, protect air quality and the amenity of the locality.”</p> <p><u>Informative:</u></p> <ol style="list-style-type: none">1. Prior to demolition or any construction work of the existing buildings, an asbestos survey should be carried out to identify the location and type of asbestos containing materials. Any asbestos containing materials must be removed and disposed of in accordance with the correct procedure prior to any demolition or construction works carried out.	
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Stakeholder	Comment	Response
Lead Local Flood Authority (LLFA) / Principal Engineer - Flood & Water Management	<p>Thank you for re-consulting us on the above FULL planning application reference number HGY/2022/0563 for (i) the demolition of existing buildings and structures, site clearance and the redevelopment of the site for a residential-led, mixed-use development comprising residential units (C3); flexible commercial, business, community, retail and service uses (Class E); hard and soft landscaping; associated parking; and associated works. (ii) Change of use of No. 52 White Hart Lane from residential (C3) to a flexible retail (Class E) (iii) Change of use of No. 867-869 High Road to residential (C3) use at the Goods Yard and The Depot 36 & 44-52 White Hart Lane (and land to the rear), and 867-879 High Road (and land to the rear) N17 8EY.</p> <p>It is understood that the proposals and associated supporting documents have been amended to reflect the scheme resubmitted on 22 May 2023. Having reviewed the applicant's submitted documents outlined below:</p> <p>1) Flood Risk Assessment document reference number HRW-BHE-GD-XX-RP-CW-0003, 0049225 Revision P01 dated 12 April 2022</p> <p>2) Drainage Strategy document reference number HCC-BHE-XX0XX-RP-C-000001, 0044501 Revision 02 dated 15 March 2023</p> <p>3) Drainage Strategy document reference number HRW-BHE-GD-XX-RP-CI-0001, 0049225 Revision 00 dated 18 February 2022</p> <p>Prepared by Buro Happold Consultant, we are content with the re-submission, and we have no further comments to make on the above planning application. If the scheme is to build as per the above submitted documents, the impact of surface water drainage will be addressed.</p>	Noted.
School Place Planning Lead	As with my last response for HGY/2022/3175 I don't have any particular comments from a place planning perspective at this stage. We have 5 primary schools in close proximity to Northumberland Park with large surpluses and our annual place planning projections from the GLA take into account future housing trajectories.	Noted.
LBH Transportation	<p><u>Overview</u></p> <p>Transportation have reviewed this application. Since the previous planning application (reference HGY/2021/1771), a number of changes and additions have been incorporated, namely:</p> <ul style="list-style-type: none"> • A small reduction in the number of residential units, from 867 to 844 • A small reduction in cycle parking provision for residents (but no reduction in visitor and 	Conditions and heads of terms recommended.

- commercial cycle parking provisions)
- Additional cumulative impact analysis as per comments on HGY/2021/1771 in Section 6.8 of the revised Transport Assessment
 - Additional vehicle swept path drawings as per comments on HGY/2021/1771
 - Inclusion of footways on both sides of the access road from White Hart Lane as per comments on HGY/2021/1771

In addition to the changes referenced above, the applicant has also very recently updated aspects of their design and application documentation to accommodate recently introduced fire safety policy requirements which now necessitate a second staircase for buildings over 30m tall.

The applicant has rearranged the layouts within the proposed buildings and by doing so revised layouts and locations of the cycle stores, and redesigned the basement with a larger footprint to accommodate changes. Conditions referenced later in this response for access arrangements and cycle parking/car parking will require the applicant to provide full details prior to commencement of the development.

Proposed Development

The development will provide 844 new homes and approximately 2,040sqm GEA of commercial floorspace (land use class E) with associated plant, loading facilities and ancillary infrastructure. A total of 139 car parking spaces would be provided on the Site, the majority of which will be at the basement level.

Proposed Residential Car Parking

Residential car parking would be provided at a ratio of 0.16 spaces per home, in line with the ratio used for the consented Depot planning application (the most recent of two approved schemes). The Goods Yard site would have 50 wheelchair-accessible and 30 standard spaces for residents whereas the Depot site would have 37 wheelchair-accessible and 22 standard spaces for residents. An additional two wheelchair-accessible spaces would be provided on the Goods Yard site for visitors to the residential units.

Proposed Commercial Car Parking

Commercial parking would consist of 10 operational spaces on the Goods Yard site which are understood to be a re-provision for the Carbery Enterprise Park, anticipated to occupy a proportion of commercial floorspace provided on site. Tying operational parking to a specific tenant is generally not supported, as Carbery Enterprise Park may end up not moving back in. However, the proposed 10 operational parking spaces are in line with Part F of Policy 6.2 of

the London Plan (2021) that states that “*Operational parking requirements should be considered on a case-by-case basis. All operational parking must provide infrastructure of electric or other Ultra Low Emission vehicles...*”. However, the proposed parking provision should be managed through the Car Parking Management Plan. One of these 10 spaces should be wheelchair accessible.

We therefore recommend that a clause be added which oversees commercial car parking and enables spaces to be decommissioned when they are not needed by commercial occupiers and brought back into use when they effectively are (individual business needs would have to be assessed for prospective occupiers prior to occupation, allocated spaces formalised in commercial lease documents and reviews undertaken regularly; any surplus parking would be rendered unavailable until the next round of reviews or new occupiers moving in).

It is suggested that the mechanism to bring into use and decommission commercial car parking spaces (capped at maximum of 10) would be dealt with through specific clauses in the Car Parking Management Plan which would also be secured by S.106 planning obligation.

Proposed Car Club Provision

On each site, it is proposed to provide two car club spaces for the use of residents and commercial occupiers, i.e. a total of four car club spaces. The direct reprovision of the approved number of car club bays cannot be accepted for the present application without any further justification or new evidence. The GLA suggests allocating five spaces to car clubs. We are of the view that the proposed quantum should be informed by discussions between the applicant and the prospective car club provider(s) who are able to determine what the likely demand for the site would be. As such, a S.106 clause will see that the Car Parking Management Plan include a mechanism whereby demand for car club bays will be reviewed on a regular basis and any additional demand be satisfied through the reallocation of other car parking spaces at ground-floor level.

Proposed Electric Vehicle Charging Infrastructure

No details of electric vehicle charging points were initially given in the Transport Assessment, the applicant has subsequently confirmed that charging points will be provided in line with the London Plan (2021) standards.

It is recommended that the provision and infrastructure be secured through a clause in the Car Parking Management Plan (S.106 planning obligation).

Car-Free/Car-Capped Agreement

Overall, WebCAT indicates that the site mostly lies in areas of PTAL 4, with the northwestern corner having a slightly lower PTAL (3). The site is also located in the Tottenham North CPZ. The proposed development would also make provision for wheelchair-accessible car parking, in line with the relevant standards. 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 will not issue any occupiers with on-street resident/business parking permits due to its car-free nature. The Council will use legal agreements to require the landowners to advise all occupiers of the car-free status of the proposed development.

Proposed Basement Car Park Access

Swept path analysis was provided showing vehicles using the proposed basement car park one-way ramp access arrangements, as well as manoeuvring in and out of spaces. Scaled drawings with appropriate dimensions were also provided and reviewed to the Council's satisfaction.

As the basement arrangements have now been altered, a pre commencement condition to provide dimensioned layout drawings and appropriate swept path plots along with vehicular access control arrangements is required to demonstrate acceptability of the revised arrangements.

Car Parking Management Plan

An outline Car Parking Management Plan has been provided as part of the Transport Assessment. A more detailed and refined plan will be required by planning condition. In addition to the allocation and enforcement strategies, the pre-occupation updated plan should include details of the proposed signal control and give-way systems used to manage vehicular movements in and out of the basement car parks via the proposed ramps.

Estimates of vehicle movements at peak hours should be included to demonstrate how the proposed control systems would effectively manage peak arrivals and departures (see reference to a planning condition for basement vehicular access control arrangements above). Any potential queues on either side of the ramps should be identified and discussed in the

context of the proposed measures.

The detailed Car Parking Management Plan should also include details of how the number of parking spaces progressively made available would correspond to the phased number of dwellings constructed, so as to maintain the ratio of 0.16 spaces per dwelling throughout the whole duration of the construction works as buildings become operational and occupied.

The detailed Car Parking Management Plan may also consider mechanisms whereby particular spaces for which no demand arises are re-assigned temporarily to other eligible user categories (using the priority system) by means of short leases, so that they can revert back to their primary function when leases are up and there is specific demand for it. In particular, this can apply to wheelchair-accessible car parking spaces if a number of them do not find disabled resident lessees requiring access to them. Such spaces can be reassigned to a secondary function as standard spaces for residents of larger units (or anybody else identified in the list in a specific order of priority) on a short-term basis.

Proposed Cycle Parking

Cycle parking is proposed in line with the relevant London Plan (2021) standards and the London Cycling Design Standards.

The adequacy of the long-stay and short-stay cycle parking and access arrangements will be secured by planning condition. This would involve the provision of full details showing the parking systems to be used, access to them, the layout and space around the cycle parking spaces with all dimensions marked up on plans.

The revised arrangements following the recent safety related design changes will need to demonstrate adherence to the London Cycles Design Standards as produced by TfL, and also include the manufacturer's installation specifications for the cycle parking design systems to be used.

ATZ Assessment

An Active Travel Zone assessment has been undertaken as part of the Healthy Streets approach. The following findings have been highlighted:

Route 1: from the Site to Angel Edmonton Shopping Centre

- Consider reducing on footway car parking provision to reduce vehicle dominance and increase the pavement widths.

Route 2: from the Site to Northumberland Park Rail Station

- Consider replacing parking provision with wider pavements or street furniture where possible.

Route 3: from the Site to Bruce Castle Park

- Consider minor improvements to Beaufoy Road as a walking route to Bruce Castle Park (condition of the pavement and crossing surfacing, as well as existing traffic filter).
- Consider improving wayfinding signage considering it is a convenient link between High Road High Street and Cycleway 1.

Route 4: from the Site to St Paul's Church on Park Lane

- Consider undertaking an assessment of the footway configuration on Park Lane, assess whether the provision of bollards hinders or aids pedestrian movement.

Route 5: from the Site to Lordship Lane

- Consider wider pavements providing opportunity for street gardens and al fresco dining outside cafés and restaurants.

Route 6: from the Site to North Middlesex University Hospital

- Consider reducing on footway car parking provision to reduce vehicle dominance, given what is likely a high level of footfall around this area.
- Consider wayfinding signing to the nearby hospital.
- Consider replacing parking provision with wider pavements or street furniture where possible.

The recommendations have been reviewed and we will seek transport contributions based on them and the priorities set by the adopted Walking and Cycling Action Plan. Of the aforementioned recommendations, the following are further considered:

- Consider reducing pavement parking
- Consider wayfinding signage to nearby stations and amenities
- Consider improving leisure walking routes
- Consider improving walking zones for town centres

Vision Zero Analysis

The Transport Assessment has not identified any patterns of accidents relating to the highway layout or public realm. Therefore, no changes to the highway network are considered necessary to address the accident clusters.

Trip Generation Assessment

The net trip generation has been calculated directly by applying the latest trip rates derived from TRICS to the uplift in floorspace and number of residential units (additional to the two consented schemes). The total trip generation has then been established by adding the net trips to the trips associated with both consented schemes. At the Council's request, sensitivity testing has been carried out: the total multi-modal trip generation has been assessed first by using the whole proposed floorspace and number of residential units, then the net trip generation has been derived by subtracting the consented trip generation from the extant Goods Yard and Depot permissions. Both sets of net multi-modal trips have then been compared and, for each mode of transport, the higher of the two forecast impacts has been utilised for the transport network impact assessment.

The same comparison has been undertaken for delivery and servicing trips. The loading bay requirement, based on the peak delivery and servicing trip generation, has been reviewed accordingly to ensure that the proposed number of loading bays remains adequate.

The revised delivery and servicing trip generation shows that twice as many vehicles would be expected during the peak hour (11:00-12:00), with a maximum of 32 LGVs and 5 OGVs or 28 LGVs and 9 OGVs. Seven loading bays are proposed, with a maximum theoretical capacity of 36 LGVs (assuming an average dwell time of 15 minutes) or 21 OGVs (assuming an average dwell time of 20 minutes) across an hour.

Whilst it is recognised that effective dwell times may be shorter (hence increased available capacity), it is predicted that the proposed loading bay capacity will suffice to cater for all the demand arising from the proposed development. It is also suggested that other vehicles (particularly LGVs) would have to rely upon short-term parking on street in the unlikely event that additional demand arose.

Transport Impact and Cumulative Impact Assessments

An assessment of the impact upon the local transport networks of the scheme considered in isolation and with local committed schemes has been provided via two different methodologies and found the impact on the walking, cycling and highway networks not to be significant in either case.

Of particular interest is the impact upon the rail and bus networks. The analysis has considered the maximum cumulative directional increases. TfL requested additional public transport impact analysis to be undertaken at more granular level, also taking account of the

wider High Road West Masterplan trips (including an estimate of the Lendlease residential trips).

The applicant has carried this out and it is understood TfL are supportive of the outcomes from this analysis and have also proposed Section 106 contributions towards bus service improvements.

The extended cumulative impact assessment undertaken by Arup at TfL's request for the previous application aimed to include the impact of the wider High Road West masterplan (HRWM). At the time of writing, the HRWM application had neither been submitted nor been reviewed yet, therefore Arup undertook an estimate of the total trip generation generated by the wider scheme, based upon up to 2,612 homes (including the delivery of the extant permission for the Goods Yard and the Depot comprising up to 646 homes). The assessment was therefore undertaken for approximately 2,000 additional homes as a result of the HRWM, using the same methodology as in the Transport Assessment for HGY/2021/1771. The additional trips generated by 2,000 homes have been compared with the residential trip generation assessment undertaken by Steer.

Total Residential Person Trip Generation Uplift (approximately 2,000 homes)

	AM Peak Hour		PM Peak Hour	
	In	Out	In	Out
Arup	168	1,137	619	360
Steer	108	860	510	262
Ratio (Steer/Arup)	64%	76%	82%	73%

The difference is not marginal and shows that the cumulative impact assessment including the wider HRMW as undertaken by Arup remains very robust.

It was noted in the planning committee report that "The overall public transport impact analysis undertaken at TfL's request is satisfactory. The cumulative bus trip impact assessment would benefit from a more granular approach to consider the impact upon relevant bus services for each direction of travel to identify the impact upon individual routes and bus capacities. TfL's views on the rail and bus impact analysis at a Stage II referral stage would be welcome."

Overall, the cumulative impact assessment included in the revised Transport Assessment is in line with the response to TfL's and our comments on planning application HGY/2021/1771 during its determination phase. They were and are still acceptable as they have not changed. TfL are seeking a contribution of £195,000 towards bus service improvements, and the

applicant has agreed to this.

Framework Travel Plan

The cycling mode share target for commercial land uses should be revised upwards from the baseline in future versions of the Commercial Travel Plan. A 7% target at the Year 5 horizon seems very unambitious. Although the end use class of the commercial space is unknown (as land use class E spans a wide range of uses), assuming an employment density of 1 employee per 15sqm NIA (based on $2,040 \times 95\% \times 70\% = 1,357\text{sqm NIA}$, i.e. 90 employees), a 7% mode share would equate to 6 employees cycling, which is roughly 40% of the long-stay cycle parking provision of 15 spaces.

Future versions of the Travel Plan should have regard to the adopted Walking and Cycling Action Plan to ensure walking and cycling targets and measures align with the Borough's aspirations.

Outline Construction Logistics Plan

A pre commencement Detailed Construction Logistics Plan (CLP) would be secured by planning condition. In the Outline CLP there is no mention of staff travel planning measures promoting on-site cycle parking. This should be picked up in the Detailed CLP.

Recommended Planning Conditions

Basement car park layout and vehicular Access Control Arrangements

The applicant is to provide prior to commencement of the development, full dimensional and layout details for the revised basement car park layout and accesses including the access control arrangements, with swept path plots as appropriate.

Reason – to ensure a safe and workable arrangement to access the basement and associated car parking that is convenient for all occupiers and users

Safety Audit requirements

- Combined Stage 1/2 Road Safety Audit – White Hart Lane
- Combined Stage 1/2 Road Safety Audit – Embankment Lane

Prior to the first occupation of the development, the developer shall enter into an agreement with the Council as the Local Highway Authority under Section 278 of the Highways Act 1980 to undertake highway works as appropriate.

The applicant will be required to provide details designs for all associated works including a Stage 1 and Stage 2 Road Safety Audits being carried.

Reason: To ensure the highway works are undertaken to high-level standards and in accordance with the Council's requirements. To enable the amendment of the Traffic Management Order enabling the reinstatement of on-street parking outside the site, as well as lining and signing works.

Cycle parking details

The applicant will be required to provide long and short-stay cycle parking provision, for both residential and non-residential elements of the development, in line with the London Plan (2021), cycle parking is to be design and implemented in line with the London Cycle Design Standards and full layout and dimensioned details will be required for review. These details are required prior to commencement of the development.

Reason: To promote travel by sustainable modes of transport and to comply with the London Plan (2021) standards and the London Cycle Design Standards.

Delivery and Servicing Plan

The applicant shall be required to submit a Delivery and Servicing Plan (DSP) for the local authority's approval. The DSP must be in place prior to occupation of the development. The delivery and servicing plan must also include a waste management plan which includes details of how refuse is to be collected from the site.

Reason: To ensure that the development does not prejudice the free flow of traffic or public safety along the neighbouring highway.

Construction Logistics Plan

The applicant / developer is required to submit a Construction Logistics and Management Plan, 6 months (six months) prior to the commencement of development and approved in writing by the local planning authority.

The applicant will be required to contribute, by way of a Section 106 agreement, a sum of £10,000 (ten thousand pounds) to cover officer time required to administer and oversee the temporary arrangements and ensure highways impacts are managed to minimise nuisance for other highways users, local residents and businesses. The plan shall include the following matters, but not limited to, and the development shall be undertaken in accordance with the details as approved:

- a) Routing of excavation and construction vehicles, including a response to existing or known projected major building works at other sites in the vicinity and local works on the highway;
- b) The estimated number and type of vehicles per day/week;
- c) Estimates for the number and type of parking suspensions that will be required; and
- d) Details of measures to protect pedestrians and other highway users from construction activities on the highway.
- e) A construction phase travel plan for the duration of the works to ensure sufficient cycle parking for workers at the site and to ensure active and sustainable modes are used

Reason: To provide the framework for understanding and managing construction vehicle activity into and out of a proposed development in combination with other sites in the locality of the site and to encourage modal shift and reducing overall vehicle numbers. To give the Council an overview of the expected logistics activity during the construction programme. To protect of the amenity of neighbour properties and to main traffic safety.

Public Highway Condition survey pre and post works

The applicant, in conjunction with the Highway Authority, is to carry out and document a condition survey of the public highway used to access the development site, prior to commencement of any construction works, to record the existing condition of the public highway, and upon completion carryout another survey, and then liaise with the Highway Authority to ensure the condition of the highway is acceptable post completion of the works.

Reason – to ensure that the public highway is in a serviceable condition post development without deterioration for Highway users

Recommended Section 106 Heads of Terms / Planning Obligations

- Car-Capping – both residential and commercial, including £5,000 towards the amendment of the local Traffic Management Order, excluding Council housing residents
- Car Club:
 - Car club provision (4No. on-site spaces) subject to monitoring and revision if additional demand arises (to be managed through the Travel Plans and Car Parking Management Plan)
 - Establishment or operation of a car club scheme
 - 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

	<p>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</p> <ul style="list-style-type: none"> • Car Parking Management Plan: <ul style="list-style-type: none"> ◦ Commercial car parking management (commissioning and decommissioning) ◦ Provision of electric vehicle charging points – both active and passive ◦ Space allocation strategy and priority order (wheelchair-accessible users, family dwelling residents etc) ◦ Basement vehicular access control arrangements ◦ Car club bay management • Residential Travel Plan (including Interim and Full documents, monitoring reports and a £10,000 monitoring contribution) including: <ul style="list-style-type: none"> ◦ 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 ◦ Car club demand monitoring • Commercial Travel Plan (including Interim and Full documents, monitoring reports and a £10,000 monitoring contribution) including: <ul style="list-style-type: none"> ◦ 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) ◦ Car club demand monitoring • Future Connectivity and Access Plan • CPZ contribution to the ongoing review and expansion of existing Controlled Parking Zones – £20,000 • Enfield CPZ contribution - £20,000 (indicatively, based on past applications) • Section 278 Highway Works – scope and extent of works to be defined after obtaining a 	
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	<p>detailed Section 278 drawing for costing purposes</p> <ul style="list-style-type: none"> TfL contribution towards bus service enhancements – £195,000 (as per the GLA's planning report GLA/2022/0228/S1/01) Transport Contributions towards the funding of scheme development and implementation of the following Walking and Cycling Action Plan measures: <ul style="list-style-type: none"> Feasibility towards feasibility and design of the High Road (A1010) protected cycle track – £90,000 Footway improvements along Pretoria Road North (pavement parking) – £20,000 Wayfinding and Legible London type signage, to link in with borough-wide signage to Tottenham Hale – £50,000 White Hart Lane protected cycle track – £50,000 – Strategic cycle link to the Lea Valley (including a range of public realm enhancements, traffic calming and greening) – <i>amount to be agreed with the Council's Regeneration team</i> Accident reduction strategy (covering clusters at the following locations: High Road/Roebuck Close, High Road/White Hart Lane, High Road/Lansdowne Road, White Hart Lane/Pretoria Road, Creighton Road/White Hart Lane, Northumberland Park/Willoughby Lane)- £50,000 Leisure walking routes (improved accessibility and permeability to leisure routes) – £30,000 Walking zones for town centres – £30,000 	
LBH Tree Officer	<p>No objection - The proposal has been supplied with an Arboricultural Tree Survey and Impact Assessment. The document has been carried out by Julian Forbes-Laird Arboricultural Consultancy Limited and is dated February 2022. The report has been carried out to British Standard 5837: 2012 Trees in relation to design, demolition, and construction.</p> <p>I concur with the findings within the report, and the quality assessment of the trees and the categorisation. The railway cutting provides a screen and green corridor of the majority of the trees. The London Plane trees 3001- 3004 (four of these are off site and adjacent) are the largest trees and as such the greatest assets. They are category A1 trees.</p> <p>Providing the root protection areas (RPAs) are carried out as the tree protection plan on the</p>	Noted – Conditions recommended

	<p>remaining trees there are no issues. We will require to see a specification of the protecting fencing.</p> <p>Several illustrative Landscape Plans have been supplied including 0862-RFM-HRW-xx-DR-L-002 Revision P01. There is a net gain overall of trees and plantings. These plans will need to be finalised with size, specifications for planting, species, and an aftercare plan.</p> <p>Any proposed works or access within the RPAs will require an Arboricultural Method Statement to show no disturbance or damage will occur in these areas.</p>	
LBH Waste and Street Cleansing	<p>Comments were not provided under this application. Comments under the allowed appeal scheme HGY/2021/1771 were as follows:</p> <p>It is proposed there will be 867 residential units and commercial space across the development.</p> <p>Following the current LBH waste guidance provision the following will be required across the whole development.</p> <ul style="list-style-type: none"> • 144x 1100L refuse containers. • 86x 1100L recycling containers. • 26x 240L food waste containers. • 867x food waste kitchen caddies. <p>Commercial waste must be stored and collected separately from residential waste.</p> <p>Any Commercial enterprise must arrange for a scheduled waste collection with a Commercial Waste Contractor.</p> <p>The business owner will need to ensure that they have a cleansing schedule in place and that all waste is always contained.</p> <p>Commercial Business must ensure all waste produced on site are disposed of responsibly under their duty of care within Environmental Protection Act 1990. It is for the business to arrange a properly documented process for waste collection from a licensed contractor of their choice. Documentation must be kept by the business and be produced on request of an authorised Council Official under section 34 of the Act. Failure to do so may result in a fixed penalty fine or prosecution through the criminal Court system.</p> <p>There is very little detail provided with the application and waste containers for each block must</p>	<p>Residential waste would be collected weekly. Space has also been provided for bulky/non-standard waste items. 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. It is recommended that a planning condition to reserve the detailed management and maintenance arrangements.</p> <p>The proposed scheme is not significantly different from the allowed appeal scheme in terms of waste and recycling arrangements and is therefore acceptable.</p>

	<p>follow the guidance provided in the bulk container advice below. All guidance above and below should be followed, and confirmation provided.</p> <p>The above planning application has been given a RAG traffic light status of AMBER for waste storage and collection.</p>	
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EXTERNAL		
Stakeholder	Comment	Response
NHS North Central London Clinical Commissioning Group now ICB (Integrated Care Board)	<p>We understand that the new application is for development of a similar scale and description to the earlier application which was refused by the Council in December 2021 (HGY/2021/1771). An appeal against the Council's refusal has been submitted to the Planning Inspectorate. The new application includes design amendments which respond to the reasons for refusal, notably building height and density, and consequently reduce the number of residential units from 867 to 844.</p> <p>As such, the CCG's response to HGY/2021/1771 is still relevant and is attached for information. Paragraph 7.7.15 of the submitted Environmental Statement (February 2022) confirms the previous assessment (June 2021) that the development would have a moderate adverse (significant) effect on primary healthcare.</p> <p>As the quantum and mix of housing has changed, the HUDU Planning Contributions Model has been used to recalculate a s106 contribution. Using the proposed housing mix stated in the Planning Statement (Tables 8.1 and 8.2), the model calculates a primary healthcare capital s106 requirement of £442,020.</p> <p>We note that paragraph 6.7.17 of the Planning Sub Committee report which considered the previous application (HGY/2021/1771) stated officer's views that the need for additional primary health care provision would be most appropriately addressed by considering the use of Strategic CIL at a later date rather than a s106 contribution.</p> <p>The CCG reiterates its view that whilst health and wellbeing facilities are included on the Strategic CIL Infrastructure List, the list is indicative and there is no guarantee that CIL receipts will be allocated towards health infrastructure in north Tottenham to mitigate the impact of development.</p> <p>To date, no CIL receipts have been allocated towards healthcare infrastructure. The s106 requirement would meet the CIL Regulation 122 tests as it is considered necessary, reasonable, and directly related to the development. There is a site-specific impact from this development proposal which cannot be directly mitigated using a CIL payment. CIL funding is not a material consideration in the determination of a planning application and cannot be used to make the development acceptable in planning terms. Therefore, a s106 contribution is considered necessary.</p>	In accordance with Haringey's Planning Obligations SPD and Annual Infrastructure Funding Statement, officers consider that the need for additional primary health care provision would be most appropriately addressed by considering the use of Strategic CIL at a later date.

Asset Protection - National Grid	Regarding planning application HGY/2022/0563, there are no National Gas Transmission assets affected in this area.	Noted.
Environment Agency	<p>Thank you for re-consulting us on the above application on 22nd May 2023, following the submission of a revised scheme.</p> <p>We have previously reviewed this planning application with amended FRA titled “The Goods Yard and The Depot, High Road West” (document ref: HRW-BHE-GD-XX-RPCW-0003, dated 12 April 2022) on 11th May 2022 and considered it satisfactory with addressing our earlier concerns.</p> <p>We have now reviewed the amended landscaping plans in the revised scheme (0862- RFM-GY-00-DR-L-0101-S2-P03-Level 00 Illustrative GA - Goods Yard) and it does not appear to change the proximity of the proposed development to the Moselle Brook Culvert, south of the site as illustrated in the FRA submitted (document ref: HRW-BHEGD-XX-RP-CW-0003, dated 12 April 2022). As such, the amended plans do not change our position and we have no objection to this planning application</p> <p>Advice to applicant</p> <p>Water Resources</p> <p>Increased water efficiency for all new developments potentially enables more growth with the same water resources. Developers can highlight positive corporate social responsibility messages and the use of technology to help sell their homes. For the homeowner lower water usage also reduces water and energy bills. We endorse the use of water efficiency measures especially in new developments. Use of technology that ensures efficient use of natural resources could support the environmental benefits of future proposals and could help attract investment to the area. Therefore, water efficient technology, fixtures and fittings should be considered as part of new developments.</p> <p><u>Residential developments</u></p> <p>All new residential developments are required to achieve a water consumption limit of a maximum of 125 litres per person per day as set out within the Building Regulations &c. (Amendment) Regulations 2015.</p> <p>However, we recommend that in areas of serious water stress (as identified in our report <u>Water stressed areas - final classification</u>) a higher standard of a maximum of 110 litres per person per day is applied. This standard or higher may already be a requirement of the local planning authority.</p>	No objection noted.

	<p><u>Commercial/Industrial developments</u></p> <p>We recommend that all new non-residential development of 1000sqm gross floor area or more should meet the BREEAM 'excellent' standards for water consumption.</p> <p>We also recommend you contact your local planning authority for more information.</p> <p>Final comments</p> <p>Thank you for contacting us regarding the above application. Our comments are based on our available records and the information submitted to us. Please quote our reference number in any future correspondence. Please provide us with a copy of the decision notice for our records. This would be appreciated.</p>	
Health and Safety Executive (HSE)	<p>1.1 The above planning application relates to a development comprising two sites; 'The Depot' and 'The Goods Yard'.</p> <p>1.2 Section 6 of the fire statement (dated 12/05/2023) states that the sites contain the following;</p> <ul style="list-style-type: none"> • 'The Depot' block A: comprises 29-storeys above ground level (plus one basement level) with a block height of 85m and is served by two staircases (FF stair?) • 'The Depot' block B: comprises 10-storeys above ground level (plus one basement level) with a block height of 28m and is served by a single staircase that constitutes the only means of escape and only firefighting staircase serving residential accommodation on every upper floor level. • 'The Depot' block C: comprises 6-storeys above ground level (plus one basement level) with a block height of 16m and is served by a single staircase. • 'The Depot' blocks D and E: comprise residential accommodation located over 6- storeys, all above ground level, both with a block height of 15.5m. • 'The Depot' block F: comprises residential accommodation located over 3-storeys, all above ground level, with a block height of 7m. • 'The Depot' block G: comprises residential accommodation located over 6-storeys, all above ground level, with a block height of 16.25m. <p>1.3 'The Depot' blocks A, B and C have a covered car park and ancillary accommodation located within the shared basement level, ancillary accommodation, residential and non-residential space at ground floor level, residential accommodation on every upper floor level (1st to 29th), and there are shared private amenity spaces on the roofs of blocks B and C.</p> <p>1.4 Blocks C, D, E, F and G are all under 18m in height and are therefore not relevant buildings, however, they fall within the curtilage of a relevant building (both blocks A and B) and have</p>	Noted that the HSE are content with the proposals from a fire safety perspective.

therefore been considered as part of this assessment.

- 'The Goods Yard' block A: comprises 33-storeys above ground level (plus one basement level) with a block height of 97m.
- 'The Goods Yard' block B: comprises 27-storeys above ground level (plus one basement level) with a block height of 79m.
- 'The Goods Yard' block C, D and F1: comprise 6-storeys above ground level (plus one basement level) with a block height of 16m.
- 'The Goods Yard' block E: comprises 7-storeys above ground level (plus one basement level) with a block height of 19m.
- 'The Goods Yard' block F2: comprises 4-storeys above ground level (plus one basement level) with a block height of 10m.
- 'The Goods Yard' block G: comprises 5-storeys above ground level (plus one basement level) with a block height of 13m.
- 'The Goods Yard' block H: comprises 3-storeys all above ground level with a block height of 7.2m.

1.5 'The Goods Yard' blocks A to G have a shared basement level containing a covered car park and ancillary accommodation (plant, cycle and waste rooms) and a non-residential area (car parking and cycle store). Ground floor level contains ancillary and residential accommodation, residential accommodation is located on every upper floor level from the 1st floor.

1.6 Blocks C, D1, D2, E, F1, F2 and G are all under 18m in height and are therefore not relevant buildings, however, they fall within the curtilage of a relevant building (both blocks A and B) and have therefore been considered as part of this assessment.

1.7 Section 6 (building schedule) of the fire statement confirms that the residential accommodation has been designed using British Standard 9991 ('BS9991') and all non-residential areas have been designed using British Standard 9999 ('BS9999'). HSE has assessed the application accordingly.

Previous consultation

1.8 HSE received a consultation request on 23/03/2022 for the aforementioned planning application and responded on 11/04/2022, under the HSE reference pgo-1076, with the headline: 'Significant Concern'.

	<p>1.9 HSE received a consultation request on 12/05/2022 for the aforementioned planning application and responded on 09/06/2022, under the HSE reference pgo-1297, with the headline: 'Significant Concern'.</p> <p>1.10 HSE received a consultation request on 31/08/2022 for the aforementioned planning application and responded on 09/06/2022, under the HSE reference pgo-1868, with the headline: 'Significant Concern'.</p> <p>1.11 The applicant held a meeting with HSE to discuss the outstanding fire safety concerns relating to the means of escape, including single staircases made vulnerable due to connection with ancillary accommodation. The meeting took place on 17/03/2023.</p> <p>Current consultation</p> <p>1.12 A subsequent email was received from the LPA on 22/05/2023 requesting further consultation. The advice to the applicant below and the substantive response headline are based on the information in the current application including the fire statement (dated 12/05/2023) and revised plan drawings for the development, which are available on the planning register.</p> <p>1.13 For the avoidance of doubt, this substantive response is in relation to the applicant's response. 1.14 Following a review of the information provided in the planning application, HSE is content with the fire safety design as set out in the project description, to the extent it affects land use planning considerations.</p>	
Historic England	<p>Thank you for your letter of 22 May 2023 regarding the above application for planning permission.</p> <p>Historic England provides advice when our engagement can add most value. In this case we are not offering advice. This should not be interpreted as comment on the merits of the application.</p> <p>We suggest that you seek the views of your specialist conservation and archaeological advisers. You may also find it helpful to refer to our published advice at https://historicengland.org.uk/advice/find/</p> <p>It is not necessary to consult us on this application again, unless there are material changes to the proposals. However, if you would like advice from us, please contact us to explain your request.</p>	<p>The views of specialist conservation and archaeological advisers has been sought and are included in the assessment within the report.</p>

	<p>Please note that 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.</p>	
Historic England (GLAAS)	<p>The planning application lies in an area of archaeological interest.</p> <p>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. Applicants should also improve knowledge of assets and make this public.</p> <p>The submitted ES and DBA appear to have been revised in February 2022 following their previous submission in May 2021 for planning application HGY/2021/1771. This office provided comments for the previous application in July 2021 but those comments do not appear to have been incorporated into the revised documents.</p> <p>Figures 3 and 4 of the DBA appear to have the location of the site in the wrong place-the Moselle River/White Hart Lane forms the southern boundary of the site.</p> <p>The application site lies on the projected line of the Roman road of Ermine Street and remains of the road and contemporary roadside activity can therefore be expected. This potential is illustrated by the Roman finds at Snell Park made immediately to the north of the application site in 1956. Later remains of roadside settlement on the site or in the close vicinity are present in historical records from the fourteenth century and mapped from the seventeenth century.</p> <p>The masterplan layout offers some theoretical scope to preserve important remains through design on the High Road frontage.</p> <p>Topographically and geologically, the site occupies the River Lea's low terrace. The Leyton gravels here (often mapped as Kempton Park) are often capped by brickearth and as a result have potential for early and later prehistoric remains.</p> <p>The Corcoran Lea Valley monograph puts prehistoric archaeological potential in this zone as moderate - disagreeing with the applicants' consultants who describe it as low - and it also puts Roman potential as being much higher than the applicants' ES does.</p> <p>Roman burials can be reasonably expected given the established pattern of funerary activity</p>	<p>Conditions attached as recommended.</p>

close to the headwaters of the Lea's tributary valleys, in this case the Moselle to the south and Pymme's Brook to the north, and the already mentioned presence of the Roman road.

Alongside prehistoric and Roman potential at the site suggested by its geography, hydrology and geology, there are also possible medieval and post-medieval remains connected with Tottenham vicarage in the south of the site. This building is proposed for demolition but as a former high status local building would normally merit consideration for retention in a consented scheme.

As well as its pessimistic assessment of potential, the ES archaeology chapter is disappointing in its mitigation proposals which all involve destructive investigation and no detailed public benefits or protection of key remains. There are a number of missed opportunities for such an extensive development to reflect and celebrate local heritage and address policy aims in that area.

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.

Recommended conditions:

Written Scheme Of Investigation

No demolition or development shall take place until a stage 1 written scheme of investigation (WSI) has been submitted to and approved by the local planning authority in writing. For land that is included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI, and the programme and methodology of 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 WSI shall be submitted to and approved by the

	<p>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:</p> <ul style="list-style-type: none"> 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. 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. 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. <p>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. This condition is exempt from deemed discharge under schedule 6 of The Town and Country Planning (Development Management Procedure) (England) Order 2015.</p> <p><u>Foundation Design</u></p> <p>No development shall take place until details of the foundation design and construction method to protect archaeological remains have been submitted and approved in writing by the local planning authority. The development shall be carried out in accordance with the approved details.</p> <p>Reason: The planning authority wishes to secure physical preservation of the site's archaeological interest in accordance with the NPPF.</p>	
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Stakeholder	Comment	Response
London Fire Brigade	The London Fire Brigade (LFB) has been consulted with regard to the above-mentioned premises and have no further observations to make. It should be ensured that if any material amendments to this consultation is proposed, a further consultation may be required.	The HSE are content with the proposals and the scheme would be required to go through further gateways and meet building regulations in terms of fire safety.
Natural England	<p>Natural England has previously commented on this proposal and made comments to the authority in our letter dated 21 March 2022 Reference number 385814.</p> <p>The advice provided in our previous response applies equally to this amendment although we made no objection to the original proposal.</p> <p>The proposed amendments to the original application are unlikely to have significantly different impacts on the natural environment than the original proposal.</p> <p>Should the proposal be amended in a way which significantly affects its impact on the natural environment then, in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, Natural England should be consulted again. Before sending us the amended consultation, please assess whether the changes proposed will materially affect any of the advice we have previously offered. If they are unlikely to do so, please do not re-consult us.</p>	No objection noted.
Network Rail	<p>Thank you for consulting Network Rail (NR) regarding the above planning application. Please see below the informative suggested by our Asset protection Team (ASPRO);</p> <p>Item 1. Concerns - Encroachment on the boundary fence, interference with sensitive equipment, space for inspection and maintenance of the railway infrastructure. Reasons/Mitigations: The developer / designer must ensure that the development line is set back from the Network Rail boundary and structure to achieve sufficient gap / space to inspect and maintain Network Rail viaduct structure and boundary assets and provide an access for inspection and maintenance of the proposed development or other assets in the future without imposing any risks to the operational railway. This would normally be 3-5m from the boundary fence depending on the adjacent NR assets or boundary fence.</p> <p>Item 2. Concerns - Stability of railway infrastructure and potential impact on the services. Reasons/Mitigations: Existing railway infrastructures including viaduct, embankment should not be loaded with</p>	Noted

	<p>additional surcharge from the proposed development unless the agreement is reached with Network Rail. Increased surcharge on railway embankment imports a risk of instability of the ground which can cause the settlement on Network Rail infrastructure (Overhead Line Equipment / gantries, track, embankment etc.).</p> <p>Item 3. Concerns - 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 a contract with Network Rail.</p> <p>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 utility services 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.</p> <p>Item 4. Concerns - Proximity of the development to the Network Rail infrastructure and boundary fence and adequate space for future maintenance of the development.</p> <p>Reasons/Mitigations: The developer must ensure any future maintenance does not import the risks to the 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.</p> <p>Item 5. Concerns - Collapse of lifting equipment adjacent to the boundary fence/line.</p> <p>Reasons/Mitigations: Operation of mobile cranes should comply with CPA Good Practice Guide 'Requirements for Mobile Cranes Alongside Railways Controlled by Network Rail'. Operation of Tower Crane should also comply with CPA Good Practice Guide 'Requirements for Tower Cranes Alongside Railways Controlled by Network Rail'. Operation of Piling Rig should comply with Network Rail standard 'NR-L3-INI-CP0063 - Piling adjacent to the running line'. Collapse radius of the cranes should not fall within 4m from the railway boundary unless possession and isolation on NR lines have been arranged or agreed with Network Rail.</p> <p>Item 6. Concerns - Collapse of temporary structure near the railway boundary and infrastructure.</p> <p>Reasons/Mitigations: Any temporary structures which are to be constructed adjacent to the railway boundary fence (if required) must be erected in such a manner that at no time will any item fall within 3 metres from the live OHLE and running rail or other live assets. Suitable protection on temporary works (for example: Protective netting around scaffold) must be installed.</p>	
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	<p>Item 7. Concerns - Piling adjacent to the railway infrastructure if any. Concerns with ground movement affecting the track geometry and surrounding ground and structure stability.</p> <p>Reasons/Mitigations: The developer must ensure that any piling work near or adjacent to the railway does not cause an operational hazard to Network Rail's infrastructure. Impact/Driven piling scheme for a development near or adjacent to Network Rail's operational infrastructure needs to be avoided, due to the risk of a major track fault occurring. No vibro-compaction/displacement piling plant shall be used in development.</p> <p>Item 8. Concerns - Trespasses and unauthorised access through an insecure or damaged boundary fence.</p> <p>Reasons/Mitigations: Where required, the developer should provide (at their own expense) and thereafter maintain a substantial, trespass proof fence along the development side of the existing boundary fence, to a minimum height of 1.8 metres. Network Rail's existing fencing / wall must not be removed until it is agreed with Network Rail.</p> <p>Item 9. Concerns - Interference with the Train Drivers' vision from artificial lighting and human factor effects from glare.</p> <p>Reasons/Mitigations: Any lighting associated with the development (including vehicle lights) must not interfere with the sighting of signalling 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 signalling arrangements on the railway. The developers should obtain Network Rail's Asset Protection Engineer's approval of their detailed proposals regarding lighting.</p> <p>Item 10. Concerns - Errant vehicle onto the railway land.</p> <p>Reasons/Mitigations: If there is hard standing area / parking of vehicles area near the property boundary with the operational railway, Network Rail would recommend the installation of vehicle incursion barrier or structure designed for vehicular impact to prevent vehicles accidentally driving or rolling onto the railway or damaging the railway lineside fencing.</p> <p>Item 11. Concerns - Potential impact on the adjacent railway infrastructure from the construction activities.</p> <p>Reasons/Mitigations: The applicant shall provide all construction methodologies relating to works that may import risks onto the operational railway and potential disruption to railway services, the assets and the infrastructure for acceptance prior to commencing the works. All works must also be risk assessed to avoid disruptions to the operational railway.</p> <p>Item 12. Concerns - Structural stability and movement of Network Rail Assets.</p>	
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	<p>Reasons/Mitigations: Network Rail's infrastructures should be monitored for movement, settlement, cant, twist, vibration etc if there are risks from the proposed development (if there the proposed development import these risks in the operational railway) to mitigate the risk of adverse impact to the operational railway in accordance with Network Rail standard 'NR/L2/CIV/177 - Monitoring track over or adjacent to building or civil engineering works'.</p> <p>Item 13. Concerns - Invasive or crawling plants near the railway. Reasons/Mitigations: The developer must ensure that the locations and extent of invasive plant (if any, for example: Japanese Knotweed) are identified and treated in accordance with the current code of practice and regulations if exists on site. Any asbestos identified on site should be dealt in accordance with current standard, Health and Safety Guideline and regulations by the developer.</p> <p>Item 14. Concerns - Interference with the Train Drivers' vision from sunlight and human factor effects from glare. Reasons/Mitigations: Glint and Sunlight glare assessment should be carried out (if there is a risk) to demonstrate the proposed development does not import risk of glare to the train drivers which can obstruct in the visibility of the signals.</p> <p>Item 15. Concerns - Effects due to electromagnetic compatibility on the users and the development located within proximity of a high voltage overhead electrification lines. Any Outside Party projects that will be within 20m and/or any transmitter within 100m of the operational railway will be required to undertake an Electromagnetic Compatibility assessment to be carried out in accordance with Network Rail standards 'NR/L1/RSE/30040 & 'NR/L1/RSE/30041' and NR/L2/TEL/30066' Reasons/Mitigations: The developer will be required to undertake a full Electro Magnetic Interference (EMC) risk assessment on the impact the project will have upon NR.</p> <p>Item 16. Concerns - Risk of electrocution and EMC interference to human health due to 25kV live OHLE on railway: Reasons/Mitigations:</p> <ul style="list-style-type: none"> • Electrocution Clearance - within 3m of the overhead cable. Distance within which any works will require the overhead cable to be isolated. • Electromagnetic interference – within 5.2m. Distance within which the effect on human health should be considered. • Dewirement zone – within 5.2m. Distance within which the overhead cable could reach in the event of a failure. • Electromagnetic compatibility – within 7m. Distance within which the affect of the 	
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building on the cable function needs to be considered in the design.

Item 17. Concerns - Environmental pollution (Dust, noise etc.) on operational railway.

Reasons/Mitigations:

Contractors are expected to use the 'best practical means' for controlling pollution and environmental 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.

Item 18. Concerns - Tree species alongside the railway boundary.

Reasons/Mitigations:

Contractors are expected to use Network Rail recommended tree species only if required alongside the railway boundary. List of recommended tree species can be made available when requested.

Item 19. Concerns - Disruption of access to operational railway.

Reasons/Mitigations:

If there are any access points / gates to the railway, it's contractor's responsibility to maintain 24/7 unobstructed access to the railway for maintenance purposes.

Item 20. Concerns - Flying objects on operational railway from the playground if any adjacent to the operational railway.

Reasons/Mitigations:

If there are playgrounds next to the operational railway, the developer shall consider a barrier / fence to hold the objects (for example: balls).

Item 21. Concerns - There is a risk of obstruction to the visibilities of railway signals due to the development, railway alignment is in a curve.

Reasons/Mitigations:

Project shall engage signal sighting chair and carry out full signal sighting assessment to confirm the railway signals are visible to the train drivers.

Item 22. Concerns - Drainage.

Reasons/Mitigations:

Drainage from the shall be taken away from the railway infrastructure. There shall not be any attenuation tank or soakaways within 10-20m from the railway boundary.

Network Rail strongly recommends the developer contacts the Asset Protection Team AssetProtectionAnglia@networkrail.co.uk prior to any works commencing on site, and also to agree an Asset Protection Agreement with us to enable approval of detailed 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/>

London Overground Infrastructure Management	<p>Pasted below are the London Overground Infrastructure Protection comments against HRGY/21/49. However, looking at HGY/2022/0563 and the site plan (copy attached), from an Infrastructure Protection perspective LO would not have any comments as its far enough away from the Station. I think when LO responded to HRGY/21/49, LO was mindful of the wider master plan (next to the Station) against which there will be comments.</p> <p><i>London Borough of Haringay Ref: HRGY/21/49</i></p> <p><i>Rail for London (RfL) has no objection in principle to the above referenced 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:</i></p> <ul style="list-style-type: none"> <i>the development will not have any detrimental effect on RfL Infrastructure & Operations in the short or long term</i> <i>the design must be such that the loading imposed on RfL Assets is not increased or removed</i> <i>we offer no right of support to the development or land</i> <p><i>RfL requests that the grant of planning permission be subject to conditions to secure the following:</i></p> <p><i>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:</i></p> <ul style="list-style-type: none"> <i>provide details on all structures</i> <i>provide details on the use of plant</i> <i>accommodate the location of the existing RfL Assets / Infrastructure</i> <i>accommodate RfL Operational and Maintenance requirements</i> <i>accommodate ground movement arising from the construction thereof</i> <i>mitigate the effects of noise, vibration & distractions arising from the adjoining operations to the RfL Infrastructure & Operations</i> <p><i>In addition,</i></p>	Condition attached.

	<ul style="list-style-type: none"> • <i>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.</i> • <i>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.</i> • <i>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.</i> • <i>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.</i> • <i>RfL would be opposed to balconies and fully openable windows on the elevations facing the railway (applicable to those in close proximity of the station/ railway).</i> <p><i>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.</i></p> <p>Reason: <i>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.</i></p> <p><i>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.</i></p>	
Sport England	<p>Although there is floorspace proposed for uses falling within Use Class E it is not clear whether any of these would actually be sport facilities and, if there were to be sport facilities, then it is not clear what sport facilities would be provided. As a result, it would be unknown if any sport facilities would meet the sporting demands arising from the development.</p>	<p>Officers consider that the sporting demands arising from the proposed scheme are best addressed by way of the proposed 'community</p>

	<p>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.</p> <p>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.</p> <p>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.</p> <p>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 2,026 (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 0.15 sports halls (£499,235), 0.11 swimming pools (£532,374), 0.07 artificial grass pitches (£88,063 if 3G or £80,098 if sand) and 0.02 rinks of an indoor bowls centres (£9,560). 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.</p> <p><u>Active Design</u></p> <p>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</p>	<p>space,' and potentially through Strategic CIL (with the Annual Infrastructure Funding Statement explicitly identifying sports and leisure facilities as eligible).</p>
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	<p>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.</p>	
<p>Metropolitan Police (Designing Out Crime Officer)</p>	<p>Comments were not provided under this application. Comments under the allowed appeal scheme HGY/2021/1771 were as follows:</p> <p>Whilst in principle we have no objections to the site, we have recommended the attaching of suitably worded conditions and an informative that highlights the key aspect of the condition and any major concerns that have been noted during the review of the files within the planning application. The comments made can be easily mitigated early if the Architects were to re-engage and discuss this project prior to commencement, throughout its build and by following the advice given.</p> <p>This can be achieved by the below Secured by Design conditions being applied (Section 2). If the Conditions are applied, we request the completion of the relevant SBD application forms at the earliest opportunity. The project has the potential to achieve a Secured by Design Accreditation if advice given is adhered to.</p> <p>Section 2 - Secured by Design Conditions and Informative:</p> <p>In light of the information provided, we request the following Conditions and Informative:</p> <p>Conditions:</p> <p>(1) Prior to the first occupation of each building or part of a building or use, a 'Secured by Design' accreditation shall be obtained for such building or part of such building or use and thereafter all features are to be permanently retained.</p> <p>(2) Accreditation must be achieved 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.</p> <p>Informative:</p> <p>The applicant must seek the advice of the Metropolitan Police Service Designing Out Crime Officers (DOCOs) to 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.</p>	<p>Secured by Design condition recommended.</p>

Thames Water	<p>Waste Comments</p> <p>The proposed development is located within 15 metres of a strategic sewer. Thames Water requests the following condition to be added to any planning permission. “No piling shall take place until a PILING METHOD STATEMENT (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement.” Reason: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to significantly impact / cause failure of local underground sewerage utility infrastructure.</p> <p>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.</p> <p>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.</p> <p>Thames Water would advise that with regard to SURFACE WATER network infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.</p> <p>Water Comments</p> <p>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.</p> <p>The proposed development is located within 15m of our underground water assets and as such we would like the following informative attached to any approval granted. The proposed development is located within 15m of Thames Waters underground assets, as such the</p>	Conditions and informatives recommended
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	<p>development could cause the assets to fail if appropriate measures are not taken. Please read our guide 'working near our assets' to ensure your workings are in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. https://developers.thameswater.co.uk/Developing-a-large-site/Planningyour-development/Working-near-or-diverting-our-pipes. Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk.</p> <p>Thames Water are currently working with the developer of application HGY/2022/0563 to identify and deliver the off site water infrastructure needs to serve the development. Thames Water have identified that some capacity exists within the water network to serve 99 dwellings but beyond that upgrades to the water network will be required. Works are on going to understand this in more detail and as such Thames Water feel it would be prudent for an appropriately worded planning condition to be attached to any approval to ensure development doesn't outpace the delivery of essential infrastructure. There shall be no occupation beyond the 99th dwelling until confirmation has been provided that either:- all water network upgrades required to accommodate the additional demand to serve the development have been completed; or- a development and infrastructure phasing plan has been agreed with Thames Water to allow additional development to be occupied. Where a development and infrastructure phasing plan is agreed no occupation of those additional dwellings shall take place other than in accordance with the agreed development and infrastructure phasing plan. Reason - The development may lead to low / no water pressures and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development. Any necessary reinforcement works will be necessary in order to avoid low / no water pressure issues.</p>	
Transport for London	<p>Access, Delivery and Servicing Arrangements</p> <p>As per earlier proposals at the same application site, the primary point of access by all modes to the southern part of the site is provided from White Hart Lane approximately at the same location of the existing crossover into The Goods Yard. This access route leads into a north-south internal route terminating at the northern end of The Goods Yard. Conversely, the access route to the northern part of the site is essentially retained in the same location as the consented scheme, via the western arm of the signal-controlled junction with High Road and Brantwood Road.</p> <p>Whilst TfL welcomes the improved public realm and access arrangement along the southern access route, which is set to provide continuous footways on both sides of the route, a Stage 1 Road Safety Audit (RSA) should be completed at this point of access prior to determination. Full consideration of the implications of the proposed traffic arrangement, including the</p>	<p>The proposed scheme improves connectivity between the Cannon Road area and the High Road and White Hart Lane for pedestrians and cyclists and includes a safe environment and cycle parking and facilities that encourage walking and cycling.</p> <p>The scheme would result</p>

	<p>proposed parallel loading bay situated to the south of Neighbourhood Square, should be incorporated. Design outcomes should address any problems/points of concern raised by the RSA, specifically road safety problems related to walking and cycle connectivity between the development and areas to the south of White Hart Lane, including White Hart Lane Station.</p> <p>The internal route will provide direct access to a number of individual cycle stores via the dedicated building cores. The proposal seeks to accommodate basement parking facilities through ramp arrangements access via a signal control system to manage movements (The Goods Yard) and give way arrangements / convex mirrors for intervisibility (The Depot) in order to control turning movements. As previously alluded to, the entrance points should not impact safety or impede vehicle or pedestrian flow in any way. Whilst the internal route is likely to be lightly trafficked, a 3.7 kerb to kerb shared surface access route is provided, allowing access to accommodate servicing, deliveries, refuse collection and emergency vehicles along a route otherwise only open to pedestrians and cyclists. A Stage 1 RSA along this access route should also be completed prior to determination.</p> <p>Healthy Streets and Vision Zero</p> <p>The Transport Assessment (TA) includes an Active Travel Zone (ATZ) assessment and a Healthy Streets Check for Designers (HSCD) for highway works. The proposal and revised uplift above the extant planning permissions will see an increase in pedestrian and cycle trips to/from the site and the local area. Whilst the improved design outcome for pedestrians at the southern end of The Goods Yard and integration of the future park space to the east and the High Road are welcomed, the TA falls short to indicate how the development will deliver local improvements that support the ten Healthy Streets indicators and Vision Zero approach in the wider area. This is of particular concern for permeability and connectivity for cyclists, including users of larger cycles, within the adjacent local area towards the Cycleway 1 (CS1) and the southern section of the masterplan area. Given that 'Beaufoy Road is [identified as] a convenient link between High Road High Street and CS1', as well as some recommendations from the ATZ, new and improved routes and connections for future residents should be provided within a local environment that meets their needs and those of people already in the area. Consistent to the recommendations for Route 3, improvements could consider signage and on street cycling facilities capable of accommodating larger cycles (e.g. a reconfigured traffic filter and improve wayfinding signage).</p> <p>TfL recommends that the applicant look at this issue in more detail, particularly the need to mitigate development impacts by upgrading, filling gaps in and/or increasing permeability and connectivity by cycling at the southern end of the site and adjacent local area, and to commit to providing enhanced cycle environments/on street cycling facilities. An action plan with the</p>	<p>in a relatively small and manageable increase in vehicular trips, which subject to the recommended planning conditions and s106 planning obligations, would be manageable.</p> <p>An assessment of likely cumulative effects (including taking account of likely public transport trips associated with the Lendlease scheme (HGY/2021/3175) for adjoining land within Site Allocation NT5) show that, subject to the Mayor of London's confirmation at Stage II, impacts should be manageable.</p> <p>There would be some adverse impacts during construction, but this can be satisfactorily managed by the recommended conditions.</p> <p>The transport arrangements for the proposed scheme are similar to those for the extant schemes, with similar connectivity and permeability across the combined sites. As with the consented schemes,</p>
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	<p>local planning and highway authority should be agreed to ensure the development enhances cyclists experience and make the wider area more attractive for cycling and better connect the site. This should be secured through condition and/or an appropriate legal agreement.</p> <p>Cycle Parking</p> <p>A total of 1,661 cycle parking spaces are proposed, including long and short stay spaces for residential units, as well as non-residential parking spaces. This is in line with the London Plan standards. However, TfL has some concerns about the quality of the cycle parking. This includes insufficient number of accessible cycle parking spaces/Sheffield stands, excessive number of proposed internal doors which need to be negotiated by users and spacing between stands/racks and walls, particularly within blocks D and E of the Goods Yard site. Push-button controls to assist with door opening should be provided. TfL understands that the applicant's team is already looking into these concerns and there seems to be a workable way forward. All cycle parking is required to be designed and laid out in accordance with the London Cycling Design Standards (LCDS), including at least 20% Sheffield stands and further 5% wider spaces for non-standard bicycles. Provision of showers, lockers and changing facilities for cyclists associated to non-residential uses should be provided. Further work is required to address TfL's concerns and subsequently the provision secured by condition.</p> <p>Car Parking</p> <p>A total of 145 car parking spaces (a ratio of 0.17 spaces per residential unit) will be provided off/on street. This car parking provision includes 87 disabled persons' parking bays and four car club spaces. This is in line with extant permissions and complies with London Plan policy T6.1.</p> <p>The London Plan requires 20% of parking to be fitted with active electric vehicle charging infrastructure, with passive provision for all remaining spaces. This should be applied and secured by condition.</p> <p>A Car Parking Management Plan (CPMP) will support the parking, which is strongly supported. Control Parking Zone (CPZ) permit free agreement should also be secured as part of the S106 agreement.</p> <p>Trip Generation and Highway and Public Transport Impact Assessment</p> <p>The methodology used to assess trip generation, including the cumulative impact assessment, is reasonable. Whilst TfL is satisfied that the proposal/proposed uplift above the extant</p>	<p>associated impacts on highway and public transport are considered acceptable. The proposed car parking would be at a ratio of 0.16:1, which is the same as was approved in relation to the extant Depot scheme and less than the 0.25:1 that was approved for the extant Goods Yard scheme (so a lower ratio overall). Cycle parking would meet the more generous cycle parking standards in the 2021 London Plan.</p>
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planning permissions is unlikely to have a significant impact on the strategic road network and that no mitigation will be required at White Hart Lane station, given the effect of the recent congestion relief project that was completed at this station, bus trip generation figures have been reviewed by TfL to determine where bus service improvements are expected to be required in the future.

Bus trip generation figures reveal that the proposals, including the revised uplift and additional trips for the HRWM site, will generate a cumulative bus demand of 258 and 251 two-way trips in the AM and PM peak periods respectively. Given that there are capacity issues on the local bus network, specifically affecting routes W3, 149 and 259 and the importance of these routes in terms of providing key east-west and north-south connection tying different parts of Haringey together, TfL requires a contribution towards bus service improvements, including but not limited to capacity enhancements, to accommodate the net new demand and mitigate the cumulative impacts of development in the local area. Consistent with other developments, this contribution is calculated based on the additional net demand generated by the development, and the proportion of the overall capacity of a double-decker bus (75 passengers) that this additional demand represents; and the total cost to provide an additional bus over a period of 5 years (£487,500). Based on the forecasted net demand (30), a contribution of £195,000 $[(487,500 \times 30) / 75]$ towards bus services improvements is therefore sought. Required contributions should not be made route specific, as TfL is continuing to review the network and route numbers may be subject to change. TfL is open to discuss appropriate trigger points that fit with the phasing of construction and occupation of this development in relation to the rest of the HRWM site.

TfL Technical Approval and Infrastructure Protection

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 Rail for London. Travel Plan, Deliveries and Servicing and Construction Logistics As with the planning application submitted in 2021, a framework Travel Plan (TP), which sets out specific objectives in support of London policy has been submitted. The focus on encouraging active modes (walking and cycling) and facilitating opportunities to achieve a healthy lifestyle for all users are welcomed. This is reflective of the expected shift from car travel to active travel, as set out in the London Plan. The use of car club bays will be monitored through the TP. An additional bay should be accommodated, if there is sufficient demand. The final TP and all agreed measures should be secured, enforced, monitored and reviewed through the S106 agreement, in accordance with London Plan Policy T4. The draft Delivery and Servicing Management Plan (DSMP) and outline Construction Logistic Plan

	(CLP) appear acceptable. The CLP should include infrastructure protection measures in respect of the adjacent railway lines and safeguard bus operation on nearby routes. The CLP should also be aligned with major stadium events.	
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Appendix 3: Internal and External Consultee Representations

Commentator	Comment	Response
Cannon Road Residents' Group	<p>I would like to confirm that Cannon Road Residents' Group object to these plans. Core reasons for this objection are outlined in sections below.</p> <p>High rise positioning and density:</p> <p>The previously accepted plans from 2019, which we had no overall objection to and saw as being balanced and reasonable, were at our realistic limit in level of height and distance we'd be comfortable to have another high rise in relation to the Rivers Apartments building. These previous plans, to confirm, were 50m away, façade to façade.</p> <p>The rejected application (HGY/2021/1771) reduced this to 30m. It was in part rejected due to unacceptable density and massing of high rises. To now come back with an application that only marginally changes this spacing to, to just 33-37m is not at all adequate, especially given it was a HRW key principle that 'Taller buildings located to minimise overshadowing of adjacent development'. We are especially unimpressed that developer community information leaflets reported this increase in space as actually being 6-7m, which is obviously incorrect and misleading for local residents.</p> <p>So with this minor edit, to 33m, the Depot building position will continue to have extra impacts on both privacy and direct light for our residents, especially on the lower levels of Rivers Apartments, where BRE recommended light levels will not even be reached at some windows and there will be drastic reductions in light. There is nothing they are able to do to make a living room window that is 34% closer not appear 34% closer. The applicant has also been exceptionally considerate in how the three NEW skyscrapers will be positioned in relation to each other, to maximise 3 factors - privacy, light and south facing views. Yet, for the only existing building (Rivers Apartments) there has been little regard for this - decisions involving light and privacy are still unacceptable for our building. We would expect the developer to be as conscientious about maintaining a level of quality housing in existing homes as they are being with the future buildings, but from every angle we look at the changes made in this new application we can't see a true attempt at this.</p> <p>We believe the applicant could still provide the same quality of design and similar number of homes while keeping at least 50m distance between us and the next skyscraper, and we are not in a position to accept any plans that do not consider this. We don't believe we are being unrealistic here. We know aspects of the area need development. We know Haringey needs</p>	<p>The northernmost tower in the proposed scheme has been moved 1 metre further away from this building when compared to the allowed appeal scheme (HGY/2021/1771) which was found to have acceptable impacts on neighbouring properties.</p> <p>Given the similarity to the approved scheme, the proposals are considered acceptable subject to appropriate mitigation through conditions.</p>

more homes and the developer is required as a business, with shareholders, to make an amount of money from development of this land. However, the new proposal and the changes being suggested fundamentally mean the applicant is still making additional money from this development at the expense of Rivers Apartments leaseholders.

We are also concerned that even with a statement of rejection on HGY/2021/1771 due to impacts on Heritage buildings on White Hart Lane, the developer has, in this update, made aspects of the Goods Yard South building even taller! The noted reasoning for this being 'to improve perception of height and proportion when considered collectively against the other changes'. To be quite honest, I have no idea what improved perception of height would really mean apart from a tall building looking tall, and why this would be a good thing to do is beyond us. To us, this change shows there is minimal interest from the developer in creating a site where massing of high rises falls towards White Hart Lane, which is a key principle for HRW. Instead, the focus continues to be on maximum density and profitability.

Depot alignment:

Our residents have always expected to be built in front of, but given the clear building positioning guidelines provided on HRW plans and the consistent community feedback that the visual impact of high rises should be limited and aligned with the train track, we never envisaged that a proposal with buildings so blatantly out of step would even be considered by Haringey council. We understand and accept there is no such thing as a 'right to a view', but equally, the applicant actively going against the HRW guidelines to provide a city view to more future owners, and putting two high rises in our eyeline to do so should not be accepted by Haringey council either. The 2019 application justified the Depot tower positioning in this way because they intended to have a path to White Hart Lane running to the West of the depot tower. This latest iteration the developer has conceded slightly and moved the Depot Building 2m further West with an alternative base plate geometry, but there is definitely scope for this to be moved further West and align properly with the HRW key principle that 'Taller buildings should form the 'edge' to the development'.

Basement plans:

Given how little the basement plans have been covered in previous application summary documents and visualisations, it is only since the planner report for HGY/2021/1771 that we have been aware of how close this is planned to be to our building and the potential structural effects of this. The basement report states that, even with maximum mitigation, the settlement impact on our building could be 2-5mm. To us, it's inappropriate for a deep basement to be

	<p>developed right on a boundary line, next to a tall building that already has experienced substantial settling issues since 2015. For example, several residents have been trapped in their flats by warped door frames and stuck doors. Even if damage to our building is only expected to be 'slight' that might still be enough to cause costly impacts for leaseholders. With 100 flats this could easily run into hundreds of thousands of pounds in repairs. We would argue, given the amount of space there is on the development site, there is plenty of scope to shift this basement plan several metres further South, away from the site boundary wall. This would appropriately mitigate risks to the Rivers Apartments building.</p> <p>Visual design:</p> <p>The vertical core of the tall buildings being lighter is a definite improvement for Rivers Apartments being more cohesive in design with these new buildings. However we still feel it's entirely at our detriment that the darkest of the brick shades is put at the Depot positioning. Rivers Apartments is the only tall building with unavoidable direct out of window views of any of these tall buildings at a close proximity - it should be given more consideration for impact on perceptions of light and space from within our homes, especially where an expected 50m distance isn't being provided. We truly believe the previous aspiration for quality coloured glaze tile facades would be a more distinctive, modern and appealing approach, if glare issues could be mitigated.</p> <p>We reiterate that we are not against development of these areas, however it must be done with a high level of consideration for, and learning from, the existing community. The developer should also take on board the reasons for rejection of their previous application. We do not believe they have been sincere attempts at either of these in the new planning application. This application has only made token edits rather than the genuine changes needed to reach a reasonable and balanced proposal that reflects HRW key principles. We object to this planning application.</p>	
Academia Way	<p>I object to the development of buildings that would dwarf Riverside apartments and dominate the skyline. The tallest of the proposed tower block has been amended by one storey. That isn't enough. It will ruin the view towards the high street from my perspective.</p> <p>Tall buildings of that height are not in keeping with the local listed buildings and are definitely not in keeping with the area. The plans aim to dominate rather than complement the neighbourhood. There are no tower blocks that high round here and in fact Haringey's project with the love lane estate aims to produce lower level housing. So this development will not flow and will ruin the look and feel of the area in terms of overshadowing and diminishing the</p>	<p>Given the similarity to the approved scheme, the proposals are considered acceptable subject to appropriate mitigation through conditions.</p>

	<p>heritage buildings in the area.</p> <p>Not only that but the existing community of local Tottenham businesses will be decimated. The aim should be improved and develop in keeping with the area not destroy.</p> <p>These plans are destructive and instead of creating spaces that endear nature and removed the clogged design that urban areas can have it will increase it ten fold. No I object.</p>	
11 River Apartments	I am not sure it is the case but We would like to have a through road access to White Hart Lane station from Rivers Apartments. Not having to go to High Street and back to White Hart Lane and then to the station when we walk will save as a lot of time.	There is potential for new routes to be opened up in the future. The existing arrangement requires access via the High Street.
20 Rivers Apartments x2	<p>Yes please start as soon as possible Tottenham looks terrible we been promised a regeneration please the area has to change and this will make the difference</p> <p>Certainly please start the work asap Tottenham really need this big change also we moved because the development project. Please keep the promise to improve the area as at the moment I don't want be here.</p>	Noted.
26 River Apartments	<p>I am broadly in favour of the Good Yard development and was happy with the original planning application which was previously approved. I have some concerns about the amended application that is being submitted.</p> <p>I note that your noise and vibration survey was predominantly based on assessments undertaken in 2017 and 2019. This does not take into account the change in rolling stock for the train line which has resulted in significantly greater noise and vibration levels when Overground trains pass through, felt and heard within River Apartments, which will be a similar distance from the railway line as at least one of the new tower blocks. It is particularly noticeable and disruptive when trains pass over a defunct railway signal. I commented on this during the last application and do not see any updated noise assessments to demonstrate any change.</p> <p>I am concerned about the amended position of the North tower block for the Depot development. Under previously agreed plans, the tower was 50m from Rivers Apartments and not in a direct line.</p>	Given the similarity to the approved scheme, the proposals are considered acceptable subject to appropriate mitigation through conditions.

Commentator	Comment	Response
33 Rivers Apartments	The development is too densely populated with flats. The buildings are too close together. The Heritage element has not been given enough thought and consideration.	Given the similarity to the approved scheme, the proposals are considered acceptable subject to appropriate mitigation through conditions. Heritage was dealt with in detail at the public inquiry and the proposals were found to be acceptable.
43 River Apartments	I'm still not happy with the distance between RA and the proposed new building. 50meters should be taken in consideration. The changes made to this proposal are minimal. I've got doors rubbing the floor, windows that scratch the frame, my front door has been changed, all due to subsidence. Meaning that, if the proposal of a basement close to RA goes ahead, I preview more issues with subsidence. Increasing the distance needs to happen.	Given the similarity to the approved scheme, the proposals are considered acceptable subject to appropriate mitigation through conditions.
48 River Apartments	Building and plans not different from original plans. Will completely obstruct views and light in Rivers Apartments. We have no assurance on how the tall buildings will affect already bad wind conditions, making balconies unusable. The position can be changed so that the buildings do not completely infringe on other buildings in the area.	Given the similarity to the approved scheme, the proposals are considered acceptable subject to appropriate mitigation through conditions.
49 Rivers Apartments x 3	North tower on the Goods Yard was planned at 50 metre away from my buildings and that's ok. 37 metres is very close and would be an infringement of privacy of people living at rivers apartments. I disagree with the plannings on the BM site The Changes proposed in this updated application do not deal meaningfully with the reasons committee rejection of HGY/2021/1772 in November 2021. The depot building has only moved 3-6 meters further away from Rivers Apartments to 33-36 meters where current approval is at 50 m. This application should be refused and depot building should be built further away at accepted 50 m positioning for my ability to enjoy my home in privacy and minimise overshadowing of Rivers Apartments.	Given the similarity to the approved scheme, the proposals are considered acceptable subject to appropriate mitigation through conditions.
53 Rivers Apartments	Spurs are trying to swat away the residents of Rivers Apartments with a frankly laughable set of proposed 'changes' which provide no meaningful mitigation to the intrusive nature of this	Given the similarity to the approved scheme, the

	<p>development.</p> <p>What difference does it make removing a single storey from one new building only to tack it onto another when all three new buildings will be taller than ours anyway?</p> <p>And moving the closest building from 33 to 36 metres away? Again, the absolute bear minimum of effort. At these distances the tower will STILL obliterate light and it's residents will STILL have birdseye views of our homes.</p> <p>Also:</p> <p>Has the structural impact of excavating the nearest tower's basement so closely to our own building been adequately assessed? Rivers Apartments may well experience significant movement. In this event, who will be responsible for the internal/external repair of our homes?</p> <p>Noise pollution:</p> <p>We've already discovered that Spurs conducted their noise pollution test from behind a brick wall. Have they now conducted a proper test, overseen by the relevant authorities, to determine just how much noise the construction of this development is going to generate? I am a freelancer working from home on audio projects for public broadcast. Excessive noise will rob me of my livelihood.</p> <p>It's as though Spurs have decided that - in the pursuit of maximum profits at all costs - an entire building of human beings with very real concerns about this development are to be patted on the head and shooed away.</p> <p>Disgraceful.</p>	<p>proposals are considered acceptable subject to appropriate mitigation through conditions.</p>
54 Rivers Apartments	<p>The new proposal does not address the previous objections raised by the committee. The so called 'Depot' building is still too close to Rivers Apartments, and the height has not been reduced adequately. Subsequently severely impacting the view and creating issues regarding privacy. Until this is addressed it is my firm belief the new proposals should be rejected.</p>	<p>Given the similarity to the approved scheme, the proposals are considered acceptable subject to appropriate mitigation through conditions.</p>
59 Rivers Apartments	<p>The changes proposed in this updated application do not deal meaningfully with the reasons for committee rejection of HGY/2021/1771 in November 2021. The Depot building has only moved 3-6m further away from rivers apartments - to 33-36m, where current approval is at</p>	<p>The distances are slightly further way when compared to those allowed at appeal by the</p>

	50m. This application should be refused, and depot building should be built further away, at the accepted 50m positioning, for my ability to enjoy my home in privacy and to minimise overshadowing on Rivers Apartments.	Inspectorate.
60 Rivers Apartments	Support improvement to desirability of area.	Noted.
77 River Apartments	<p>The changes proposed in this updated application do not come close to addressing the reasons for committee rejection of HGY/2021/1771 back in November 2021. The Depot building only plans to move location a staggering 3-6m further away from the rivers apartments - this would mean a distance of 33-36m, where the current approval stated 50m. The proposed reduction in building height is insulting as it is still way above the original height proposed (it has been raised 50% since original plans) and would continue to dwarf our tower. If built at the 50m distance as previously stated and with the number of storeys vastly reduced this will reduce the impact of the shadows cast on rivers apartments and reduction in our privacy.</p> <p>In addition, the 5m deep basement that they also intend to build will be right on our boundary line and could cause 2-5mm of further settling disruption in our building. Natural settling already causes enough issues as it and our homes barely have enough spacing in our frames to cope with that, where doors sticking and trapping residents in their flats is commonplace.</p> <p>On the whole the refusal to make a genuine attempt to acknowledge the issues raised and these minimal modifications show genuine disregard for us and the wider neighbouring community. This application should be refused.</p>	Given the similarity to the approved scheme, the proposals are considered acceptable subject to appropriate mitigation through conditions.
79 Rivers Apartments	The changes proposed in this updated application do not deal meaningfully with the reasons for committee rejection of HGY/2021/1771 in November 2021. The Depot building has only moved 3-6m further away from rivers apartments to 33-36m, where current approval is at 50m. This application should be refused and depot building should be built further away, at the accepted 50m positioning, for my ability to enjoy my home in privacy and to minimise overshadowing on Rivers Apartments.	Given the similarity to the approved scheme, the proposals are considered acceptable subject to appropriate mitigation through conditions.
82 Rivers Apartments	<p>Following a further review of the updated plans to carry out the development of The Goods Yard and The Depot 36 & 44-52 White Hart Lane (and land to the rear), and 867-879 High Road (and land to the rear), it seems as though there is not much change in the new proposals.</p> <p>The change in the location of the building from 50 meters away to 30 meters away from Rivers Apartments has been proposed again. As highlighted in my original statement he closer</p>	Given the similarity to the approved scheme, the proposals are considered acceptable subject to appropriate mitigation through conditions.

	<p>proximity of the building will in turn cause a number of disruptions to the residents with regards to blocking of light and views. Where this may not affect those of us on the North side of the building, what is concerning is the level of noise, debris, and dust that may result from the building works being closer. Furthermore the period of seven years allocated for the building works will provide very uncomfortable living conditions. Given the ever increasing 'working from home culture' the ability to carry out office calls, concentration on tasks or education and training at home etc will be difficult. Enjoying my balcony is currently a rare occasion due to excessive noise of the industrial estate close by anyway, the added noise pollution of building works would make this near impossible.</p> <p>Plans to build a 5m deep basement right next Rivers Apartments may also significantly affect the building, potentially to causing 2-5mm of further settling disruption.</p> <p>Furthermore, the style of the buildings (colours etc) do not seem to be in line with our current scheme, any further developments should be designed to allow our development to look as though we are part of the wider structure.</p>	
88 Rivers Apartments	<p>Given the serious concerns raised by myself and other members of the community at the previous planning submission, I'm extremely surprised to see this application, and how little it does to address the clear and obvious problems that were raised.</p> <p>My main concern was that of privacy, and light for existing residents of the area.</p> <p>The original approved plans that were roundly accepted as fair, respecting current leaseholders of Rivers Apartments whilst building new homes that are needed, had the northern most tower of The Depot at 50m from the south elevation of Rivers Apartments, the second plans reduced this to 30m, which was unacceptable, and rightly not approved.</p> <p>The developers have updated their most recent plans by moving the building a mere 3-6m further away, to 33-36m. This is still FAR too close, and is an insult to suggest that they have taken local residents concerns into account, or the issue of privacy that will affect future residents of the new building.</p> <p>This application should be refused immediately, and The Depot Tower built at the perfectly acceptable position it was originally intended for, at 50m away.</p> <p>At 50m distance, myself and other residents can expect a reasonable amount of privacy, and minimal overshadowing. At 33-36m, I fear that we will be unable to enjoy our homes, and</p>	<p>Given the similarity to the approved scheme, the proposals are considered acceptable subject to appropriate mitigation through conditions.</p>

	<p>neither will the new residents who face Rivers Apartments.</p> <p>There is no good reason for The Depot Tower to be built this close to Rivers Apartments, other than to increase sale prices and profits for the new towers south of Rivers Apartments.</p> <p>The previous plans positioned all of the new towers in reasonable positions so that new residents would benefit, and existing residents would not have privacy or access to daylight impeded. This has been totally disregarded in the updated plans at our expense for the developers profit.</p> <p>There is enough room on the site to position all of the towers equally without having such a drastic impact on the existing residents and environment, you have just chosen not to do so in order for a higher return.</p> <p>The lack of consideration for an existing community in the pursuit of profit was shocking in the first instance, but the resubmission of these plans that do not fully acknowledge our concerns is even worse.</p> <p>3-6m adjustment in distance is insulting, and it is barely even a token gesture.</p> <p>These plans should be refused immediately, and the developers should stick to their original plans, which were accepted by the council, and the community.</p>	
89 Rivers Apartments x2	<p>I would also like to use some comments previously raised by other residents:</p> <p>PROXIMITY</p> <p>- Unacceptable proximity to Rivers Apartments:</p> <p>The depot building consent is currently 50m away from Rivers Apartments, the rejected plan is 30m, and this new plan is now at 33-37m away. I'd like to highlight that the latest booklet that Spurs provided is misleading because it states that it has moved the building 6-7m further away, while in reality it would be 3- 7m away. Such close proximity would have severe impact especially to all south-facing apartments for the duration of building works, with noise disruption impacting residents' ability to do their job successfully when working from home. From a long term perspective, this distance is insufficient to allow for proper privacy, sunlight access and creates a total view obstruction.</p>	<p>Concerns are noted. The scheme is similar to that approved at appeal by the Inspectorate who found all these aspects to be acceptable.</p>

	<p>- Change in building size in proximity to Cannon Road development:</p> <p>The original plan had Rivers Apartments as the highest building in the surrounding area, with other buildings tapering down as they got closer to White Hart Lane, in order to allow for a fairer share of sunlight and views of London, as well as minimising privacy intrusion. In fact, originally these newer buildings were meant to comprise one taller (max 18 stories) and a smaller one in between Rivers Apartments and the taller one. Plans always allowed for a smaller building in between Rivers Apartments and the new taller building in order to allow for privacy and sufficient sunlight exposure.</p> <p>- Quality of life:</p> <p>The revised plans that they are proposing are changing the entire complex by making a tall building even taller and placing it approximately 40% closer to Rivers Apartments. The plan states that the updates will:</p> <p>Create more considered spacing between the taller buildings, which helps the buildings complement each other better and allows for more sky and sunlight to be seen between them when looking at them from the ground level.</p> <p>The above statement negates the existence of Rivers Apartments and totally ignores the detrimental impact on our privacy, light and increased wind. In addition, we have a shared terrace space on 2nd floor which is now going to have a 29-story building a mere 13 metres away, rendering it useless as it will no longer be a peaceful & private place to unwind.</p> <p>HEIGHT</p> <p>- Light, privacy & view:</p> <p>I must challenge not only the positioning of the new buildings but also the height. It is absolutely absurd to place a taller building on the southern (S, SE, SW) side of another, thus obstructing daylight and creating a shadow over it. This will have a significant impact on the wellbeing of residents and school-children on the entire Cannon Road complex: Rivers Apartments, Mallory Court, Ambrose Court and Brook House. This project began with the aim of improving the area and creating a better living space for residents of various income levels. Whereas now it is becoming obvious that the plans are going to be detrimental especially to residents who are in social / shared ownership housing, as well as the school-children in the local school, in favour of private buyers of these newly planned buildings. Any building that is being planned should not</p>	
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	<p>be so significantly tall and should be 18 stories or lower as originally planned for.</p> <p>- Increase in height:</p> <p>The application was rejected a few months ago partly due to issues with the height of the buildings, but the new plans are showing the shoulder of the Goods Yard South tower even taller vs the rejected proposal. This is unacceptable and clearly not respecting the councillors' feedback and concerns</p> <p>Heritage sites:</p> <p>The new plan shows buildings even closer to some heritage settings, which was a reason for the rejection a few months ago. Again, another example of flagrant disregard for the feedback provided as part of the rejection</p> <p>DENSITY</p> <p>One of the concerns that led to the rejection of the latest plans was around density of population within this estate, and its impact on surrounding areas. The reduction from 867 to 844 residential homes does not come close to addressing or solving this issue.</p> <p>OPEN SPACE</p> <p>The proposal has decreased the total amount of site-wide open space by 20sqm, with a slight increase in provision per residential home overall (from 18.1sqm to 18.5sqm). This does not respond to the concerns raised during the rejection around insufficient provision of publicly accessible open space for the estimated resident population.</p> <p>IMPACT ON RIVERS APARTMENTS</p> <p>Rivers Apartments was planned as a shared-ownership-only building in order to help first time buyers onto the property ladder. These new plans will negatively impact the value of the properties at Rivers Apartments, therefore further penalising all the first-time buyers which the Spurs project was supposedly meant to help by building Rivers Apartments. It appears that Spurs' benefactory intentions to help the under-privileged is clearly a facade and the main objective is to make as much money as possible without any regard for existing residents.</p> <p>In addition to all of the above, would it not make complete sense to flip the entire plan around</p>	
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	<p>and have the tallest building next to white heart lane station at the other end as opposed to right next to the south side of rivers apartments?</p> <p>This would avoid possible movement to our building, no longer obstruct our views as badly, negate our privacy (both in apartments and roof terrace on second floor) along with our constant refusal of these ¿so called¿ changes/updates to proposal that will not make many of us change our minds.</p> <p>Do the right thing and think this through properly this time! Take into consideration what i have said, we have all said and do the right thing. Third time lucky am guessing but please make sure you inverse the plan</p> <p>We object to the new proposals as we had to the original ones. There is hardly any change, so please do not lull the wool over our eyes!</p> <p>No thanks to any more subsidence, we already have ample cracks etc in our apartment and any new buildings so close to rivers apartments will amplify these and create more</p> <p>A low key scheme would be more than welcome but not more than 10 stories. Being in the south side upper floors we do not wish to have an eye sore directly in front of us! No need for such a tall building.</p> <p>Tottenham needs change but why try and get so many apartments in to one area, seems like it all boils down to profits!</p> <p>Please have consideration for established residents of the immediate surrounding area (rivers apartments block).</p>	
94 Rivers Apartments x2	<p>The changes proposed in this updated application do not deal meaningfully with the reasons for committee rejection of HGY/2021/1771 in November 2021. The Depot building has only moved 3-6m further away from rivers apartments - to 33-36m, where current approval is at 50m. This application should be refused and depot building should be built further away, at the accepted 50m positioning, for my ability to enjoy my home in privacy and to minimise overshadowing on Rivers Apartments.</p>	As above.
96 Rivers Apartments	<p>As a resident of Rivers Apartments on Cannon Road, I'm alarmed at these revised plans which are so far off the original plans that were disclosed to us when investing in our property in 2016 that they are virtually unrecognisable. There are also barely any changes of significance</p>	

versus the plans that were rejected by councillors just a few months ago.

PROXIMITY –

Unacceptable proximity to Rivers Apartments:

The depot building consent is currently 50m away from Rivers Apartments, the rejected plan is 30m, and this new plan is now at 33-37m away. I'd like to highlight that the latest booklet that Spurs provided is misleading because it states that it has moved the building 6-7m further away, while in reality it would be 3- 7m away. Such close proximity would have severe impact especially to all south-facing apartments for the duration of building works, with noise disruption impacting residents' ability to do their job successfully when working from home. From a long term perspective, this distance is insufficient to allow for proper privacy, sunlight access and creates a total view obstruction.

- Change in building size in proximity to Cannon Road development:

The original plan had Rivers Apartments as the highest building in the surrounding area, with other buildings tapering down as they got closer to White Hart Lane, in order to allow for a fairer share of sunlight and views of London, as well as minimising privacy intrusion. In fact, originally these newer buildings were meant to comprise one taller (max 18 stories) and a smaller one in between Rivers Apartments and the taller one. Plans always allowed for a smaller building in between Rivers Apartments and the new taller building in order to allow for privacy and sufficient sunlight exposure.

- Quality of life:

The revised plans that they are proposing are changing the entire complex by making a tall building even taller and placing it approximately 40% closer to Rivers Apartments. The plan states that the updates will:

Create more considered spacing between the taller buildings, which helps the buildings complement each other better and allows for more sky and sunlight to be seen between them when looking at them from the ground level.

The above statement negates the existence of Rivers Apartments and totally ignores the detrimental impact on our privacy, light and increased wind. In addition, we have a shared terrace space on 2nd floor which is now going to have a 29-story building a mere 13 metres away, rendering it useless as it will no longer be a peaceful & private place to unwind.

HEIGHT

- Light, privacy & view:

I must challenge not only the positioning of the new buildings but also the height. It is absolutely absurd to place a taller building on the southern (S, SE, SW) side of another, thus obstructing daylight and creating a shadow over it. This will have a significant impact on the wellbeing of residents and school-children on the entire Cannon Road complex: Rivers Apartments, Mallory Court, Ambrose Court and Brook House. This project began with the aim of improving the area and creating a better living space for residents of various income levels. Whereas now it is becoming obvious that the plans are going to be detrimental especially to residents who are in social / shared ownership housing, as well as the school-children in the local school, in favour of private buyers of these newly planned buildings. Any building that is being planned should not be so significantly tall and should be 18 stories or lower as originally planned for.

- Increase in height:

The application was rejected a few months ago partly due to issues with the height of the buildings, but the new plans are showing the shoulder of the Goods Yard South tower even taller vs the rejected proposal. This is unacceptable and clearly not respecting the councillors' feedback and concerns.

- Heritage sites:

The new plan shows buildings even closer to some heritage settings, which was a reason for the rejection a few months ago. Again, another example of flagrant disregard for the feedback provided as part of the rejection.

DENSITY

One of the concerns that led to the rejection of the latest plans was around density of population within this estate, and its impact on surrounding areas. The reduction from 867 to 844 residential homes does not come close to addressing or solving this issue.

OPEN SPACE

	<p>The proposal has decreased the total amount of site-wide open space by 20sqm, with a slight increase in provision per residential home overall (from 18.1sqm to 18.5sqm). This does not respond to the concerns raised during the rejection around insufficient provision of publicly accessible open space for the estimated resident population.</p> <p>IMPACT ON RIVERS APARTMENTS</p> <p>Rivers Apartments was planned as a shared-ownership-only building in order to help first time buyers onto the property ladder. These new plans will negatively impact the value of the properties at Rivers Apartments, therefore further penalising all the first-time buyers which the Spurs project was supposedly meant to help by building Rivers Apartments. It appears that Spurs' benefactory intentions to help the under-privileged is clearly a facade and the main objective is to make as much money as possible without any regard for existing residents.</p>	
98 Rivers Apartments	<p>The changes proposed in this updated application do not deal meaningfully with the reasons for the committee rejection of HGY/2021/1771 in November 2021. Spurs have shown a complete disregard for the residents of cannon road. They are trying to push the limits to see if they can get away with it. The Depot building has only moved 3-6m further away from rivers apartments to 33-36m, where current approval is at 50m. This application should be refused and the depot building should be built further away, at the accepted 50m positioning, for my ability to enjoy my home in privacy and to minimise overshadowing on Rivers Apartments.</p>	<p>The proposal is now 1 metre further away than the approved appeal scheme which was found to be acceptable.</p>
78 River Apartments	<p>Firstly, I'd like to advise that I strongly agree with all the comments that the Cannon Road Residents' Group has submitted on this new planning application.</p> <p>As advised in my previous objection, I appreciate what the regeneration vision is trying to achieve, however, I object again to these 'revised' plans. These plans will again be of detriment to me, many of my fellow residents of Rivers Apartments and the surrounding communities. Ultimately they will impact the quality of our lives and the enjoyment of our homes.</p> <p>1. High rise buildings and positioning</p> <p>The application prior to this most recent one was rejected for including excessively tall buildings. The shoulder of the south building is now even taller and close to some heritage sites which was also a reason for the rejection.</p> <p>Current approval for the buildings is 50 metres away from Rivers Apartments. In these most recent revised plans plan the proposal is still too close at 33-36 metres. The Depot building has</p>	<p>Concerns are noted. The scheme is similar to that approved at appeal by the Inspectorate who found all these aspects to be acceptable.</p>

	<p>only moved a further 3-6 metres. Moreover, the booklet that was distributed to residents and other impacted parties states it's now 6-7 metres which is misleading (and still too close to our building).</p> <p>The buildings continue to be positioned in order to have attractive views of the city, privacy and light to achieve the best possible price for Spurs and the developers. This position will however, affect the enjoyment, privacy and light for many flats in Rivers Apartments. The buildings will be both overbearing and overshadowing and the impact on our block continues to be overlooked. Consideration has been given to future residents to fund Spurs' developments at the expense of the Rivers Apartments leaseholders (and also others who hold investments in this building such as Newlon Housing Trust).</p> <p>Some flats will be left with light levels below BRE recommended levels. For some other flats, this means that views from their homes will be of two of the high rises. This goes against the High Road West planning guidelines which advises that all high rises should be in line against the train track. The High Road West plans also advised there would be a scaling down of the high rise blocks but again this is still minimal.</p> <p>There must be a way that the blocks can be positioned in such a way that we all benefit from this regeneration.</p> <p>2. Colour and design of the building</p> <p>The proposed external facade of the building does not align with our building or other local buildings. The proposed design and materials fail to be of sufficiently high architectural quality expected of such prominent buildings.</p> <p>3. Basement</p> <p>The 5 metre deep basement that is proposed to be built right next to Rivers Apartments is also likely to cause issues with our building. Many residents, including myself, have significant issues with sticking front doors and plasterboard cracks and this has great potential to cause an additional 2-5mm of settling disruption.</p> <p>It's hard to understand why this basement is being built so close to our building.</p> <p>In conclusion, I hope that these comments and others that are received on the planning application from local residents and other affected parties will again be factored into the decision making to achieve a fair and equitable outcome.</p>	
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Commentator	Comment	Response
20 Cannon Road	Please go ahead with the work asap! We full support the planning application that's why we invested in the Tottenham flat. Please do not break the promise you made to all of us and start this asap ! Thank you david waiting 4 years for a better area where to leave! B	Noted
93 Cannon Road	The three propose building are too high and too close to Rivers Apartments cutting the sun light to the flats on the side of the proposed new development. Those new buildings should be a bit more away from Rivers Apartments. It will be nice to add more green areas and small shops to promote more healthy habits and support small businesses. Also, the trains in White Hart Lane should increase frequency if the amount of residents will increase. Finally, some solutions should be included to reduce the issues with prostitution and drug sales around this area.	Concerns are noted. The scheme is similar to that approved at appeal by the Inspectorate who found all these aspects to be acceptable.
45 Pretoria Road	<p>While I support the regeneration and new housing in the area in general, I still have concerns about this updated development plan.</p> <p>I do appreciate the effort to address the concerns highlighted by the council and the existing community in the area with regards to the previous plan (HGY/2021/1771). In particular I'm pleased that the colours of the towers are now of a lighter and less overbearing tone than before. Also that the width of the towers have been reduced with the depot tower further away from the Rivers Apartments building giving more light and less shadow between those two towers.</p> <p>However, the measurements do not seem to go far enough to allay my overall concern that the towers would still affect quality of life negatively for the neighbouring residents around the development. Certainly removing only one storey from the tallest tower and instead heightening the sleeves of the other tower seems to do the opposite of what it aims to do in terms of lessening the effect. Also the gap between the north GY tower and the Depot tower seems like it would be narrower with the latter moved closer towards the former and the railway, which I feel would reduce the benefit of adding 7m of distance from Rivers Apartments somewhat.</p> <p>All in all it seems like the adjustments made to the layout of the plan is more of a 'nip-and-tuck' to appease the planning department than a genuine effort to address the real concerns of the council and residents, which led to the previous proposal being rejected in the first place. Even with the obvious age in design it would seem that something more closely aligned with the extant plan that was approved in 2019/20 would be more favourable in general.</p> <p>I'm also rather concerned that the reduction of completion time in the building schedule would</p>	<p>Support for the design changes are noted.</p> <p>The proposal is now 1 metre further away than the approved appeal scheme which was found to be acceptable.</p>

	<p>lead to compromises in build quality of the overall project. I understand the need to meet deadlines, but I would hope that there has been consideration for adjustment between this planning application's schedule and the previous, where it looks like completion times have not changed despite the start time being delayed by at least 10 months.</p>	
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The Goodsyard and the Depot, Tottenham

Local Planning Authority: Haringey

Local Planning Authority reference: HGY/2022/0563

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

Full planning application for the residential-led mixed use redevelopment of the site comprising 844 homes (36% affordable housing by habitable room), 2,040 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 31-storeys.

The applicant

The applicant is **Goodsyard Tottenham Ltd** and the architect is **F3**

Strategic issues summary

Land use principles: Further optimisation of the site's potential development capacity over and above the extant planning permission is supported as part of a comprehensive residential-led mixed use scheme.

Housing and affordable housing: 36% affordable housing (by habitable room) comprising 40% low cost rent and 60% intermediate housing is proposed, with provision for the overall quantum of affordable housing to be increased to 40% affordable housing with grant. The proposed tenure split complies with the Tottenham Area Action Plan. The blended affordable housing threshold for the site would be met. The affordability of intermediate housing and phasing of affordable housing should be agreed and secured together with an early stage review mechanism.

Urban design: The layout, landscaping, density and residential quality is supported. Tall buildings are proposed in a location which is identified as suitable for tall buildings. The same number of towers are proposed as the extant permission but with an increase in height and changes to the massing arrangement. The scheme generally complies with the qualitative assessment criteria in Policy D9 in respect of visual, functional, environmental and cumulative impacts.

Heritage: The scheme would cause less than substantial harm to a number of designated heritage assets. As such, the public benefits associated with the application will need to outweigh this harm. This could be the case in this instance, subject to these benefits being secured at Stage 2 and further clarification on a number of issues.

Transport: A £195,000 contribution towards bus service enhancements is required. Stage 1 Road Safety Audits (RSA) should also be undertaken. Further discussion is required in relation to Healthy Streets improvements in the wider area. Cycle parking should be secured in line with the minimum quantitative standard in the London Plan and in line with the London Cycling Design Standards. Further discussion is required in relation to the design of cycle parking stores. A Car Parking Management Plan and car parking permit free obligation should be secured. Delivery and Servicing Plan, Construction Logistics Plan and Travel Plans should be secured.

Climate change and environmental issues: The energy, urban greening and drainage strategies are acceptable. The applicant is proposing to connect the site to the planned Lee Valley District Heat Network. This is strongly supported and should be secured. Details of the proposed noise mitigation measures should be secured via condition.

Recommendation

That Haringey Council be advised that the application does not fully comply with the London Plan for the reasons set out in paragraph 130. However, the possible remedies set out in this report could address these deficiencies.

Context

1. On 22 March 2022 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(c): "Development which comprises the erection of a building which is more than 30 metres high and is outside the City of London."*
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/>

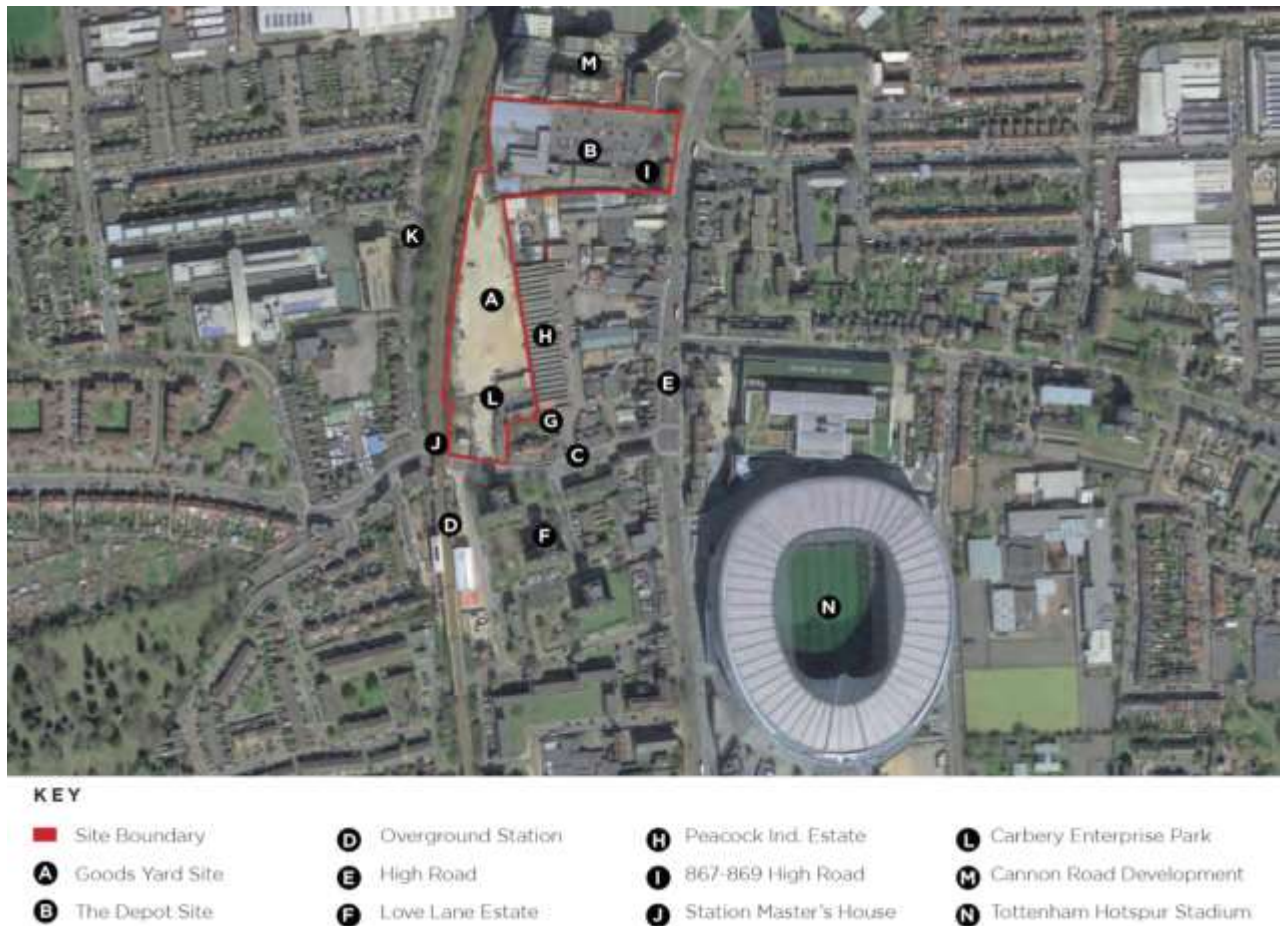
Site description

6. The site is 2.5 hectares in size and is located in Tottenham within the Lee Valley Opportunity Area and Northumberland Park Growth Area. The site comprises two elements: the Goods Yard; and the Depot, which are shown below in Figure 1. Both sites benefit from separate extant planning permissions for residential-led mixed use development and fall within the High Road West Masterplan Area.
7. The Goods Yard is bounded by an elevated railway line and tree-lined embankment to the west; the Peacock Industrial Estate to the east; and White Hart Lane to the south. The majority of the Goods Yard comprises cleared land which was used as a construction compound for the Tottenham Hotspur

Stadium development. The southern part of the Goods Yard site closest to White Hart Lane includes the Carberry Enterprise Park which comprises two-storey light industrial units. In addition, a two-storey Victorian building (Station Master's House) falls within the site boundary and fronts White Hart Lane. This property is locally listed and is currently vacant.

8. The Depot site is to the north of the Goods Yard and is bounded by Tottenham High Road to the east; the Cannon Road Development to the north; the railway embankment to the west; and light industrial buildings to the south. The Depot site comprises a large footprint two-storey retail building which is occupied by B&M Stores (previously Sainsbury's) and a large surface car park. In addition, the site includes five small retail units to the south. The majority of these units are understood to be vacant. To the east, the site includes Nos 867-869 High Road which is a Georgian three-storey Grade II listed property.

Figure 1 – The Goods Yard and The Depot site and surrounding context



9. The Depot site includes the Grade II listed 867-869 High Road and the Goods Yard site includes the locally listed Station Master's House. These areas of the site fall within the North Tottenham Conservation Area. There are a number of heritage assets in the immediate and wider area, as set out in more detail below.

10. The site has a Public Transport Access Level (PTAL) ranging between 3 and 5 (on a scale of PTAL 0 to 6b, where 6b represents the highest level of public transport access). White Hart Lane Station (London Overground and Greater Anglia services) is immediately to the south of the site and has been recently upgraded, with a new station building, entrance and ticket hall and step-free access provided. Northumberland Park station (National Rail services) is approximately 1 kilometre to the east. Seven Sisters station (London Underground Victoria Line and London Overground) is 3 kilometres to the south. The nearest bus stops to the site are located along the High Road, White Hart Lane and Northumberland Park. Six daytime bus routes are served from these bus stops.
11. 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. Cycleway 1 (from Tottenham to Liverpool Street) is located approximately 400 metres to the south of the site.

Surrounding context

12. The site has a close proximity to a number of listed buildings. The Grade II listed the Grange (34 White Hart Lane) is immediately adjacent to the site to the south. There are a number of other Grade II listed buildings along the western side of High Road, including: 797 and 799 High Road; 819 and 821 High Road; 859-863 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.
13. The North Tottenham Conservation Area covers the High Road and White Hart Lane. It is one of five conservation areas which make up the wider Tottenham High Road Historic Corridor which from the borough boundary down to Seven Sisters and South Tottenham, including Tottenham Green, Bruce Grove, Scotland Green and Seven Sisters Conservation Areas. Other conservation areas in the wider area include the Tottenham Cemetery Conservation Area, Bruce Castle Conservation Area to the south west. Fore Street Angel and Fore Street South Conservation Areas are to the north of the North Circular, along the High Road and fall within Enfield.
14. The surrounding area is undergoing significant change with a number of completed and approved large-scale mixed use developments. This includes the Northumberland Development Project (NDP) and the new Tottenham Hotspur Stadium which opened in April 2019. The second phase of the NDP will comprise a mix of hotel, residential, sport/leisure and community uses with two 19-storey towers, 27 and 36-storey towers and a 51 metre AOD high sports centre building (LPA ref: HGY/2015/3000).
15. The Cannon Road development to the north of the Depot site has been recently completed and comprises residential blocks ranging in height from 6 to 10, together with a 22-storey tower (Brook House) and a primary school.

16. To the south is the Love Lane Estate which currently comprises residential buildings of between 10 and 4-storeys. The housing estate is currently the subject of an estate regeneration / redevelopment proposals as part of the wider High Road West Masterplan.
17. The area to the west of the railway comprises two to three-storey Victorian terraces, some more recent four-storey blocks and Haringey Sixth Form College.

Case history

18. Two separate extant planning permissions are in place on the site which are summarised below:
 - 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. In terms of affordable housing, the permitted Goods Yard scheme proposed 35% (by habitable room), based on a tenure split of 40% affordable rent and 60% intermediate (shared ownership).
 - 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. The permitted scheme on the Depot secured 35% affordable housing based on a 40:60 tenure mix of social rent / LAR and intermediate, weighted towards intermediate housing provision.
19. In June 2021 the applicant submitted a planning application covering both sites. This proposed residential-led mixed use redevelopment of the site comprising 867 homes (36% affordable housing), 1,878 sq.m. of flexible Class E use, together with public open space, landscaping, parking, with building heights ranging from 6 to 32-storeys (LPA Ref: HGY/2021/1771).
20. 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, subject to planning conditions and the conclusion of a Section 106 agreement, for the reasons set out in their Planning Committee Report and Addendum. The Council's draft decision notice cites three reasons for refusal relating to tall buildings, heritage and open space. These are summarised in the GLA's Stage 2 report dated 20 December 2021 (Ref: GLA:2021/1229/S2) which can be found [here](#).

21. At Stage 2, the Mayor decided to allow Haringey Council to determine the application and confirmed that he did not therefore wish to take over the determination of the planning application. This applicant has since lodged an appeal which is currently being considered by the Planning Inspectorate with a Public Inquiry expected to take place during this summer.

Details of this proposal

22. Full planning permission is sought for the residential-led mixed use redevelopment of the site comprising:
- 844 homes (36% affordable housing by habitable room);
 - 2,040 sq.m. of flexible commercial, business, community, retail and service use (in Class E use);
 - change of use of the locally listed Station Master's House (52 White Hart Lane) to a flexible retail, food and beverage use (Class E);
 - change of use of the Grade II listed 867-869 High Road to residential;
 - on-site public and private open space, including a new public park within the Depot site;
 - associated parking and hard/soft landscaping; and
 - building heights ranging from 6 to 31-storeys.
23. A summary of the key changes to the previous application submitted in 2021 is provided below:
- A reduction in the number of residential homes from 867 to 844, with a corresponding decrease in density.
 - A reduction in height of the central tower (Goods Yard North Block A) by one storey, reducing this from 32 to 31 storeys.
 - A slight increase in the height of the southern shoulder of the Goods Yard South tower, to improve perception of height and proportion when considered collectively against the other changes.
 - Reconfiguration of the northern tower (within The Depot) with an alternative floor plate geometry, resulting in the tower moving 2 metres to the west and 1.5 metres to the south further away from Rivers Apartments. This creates an oblique offset to Rivers Apartments ranging from 33 metres to 37 metres.
 - Reducing the width of the (central) Goods Yard North tower by circa 3 metres) to increase perception of slenderness and offsets the reduction in height.
 - Reduction in the weight of the three tower 'tops' to reduce mass at high level and increase the sky gap when read across distance views.

- The Goods Yard Block A tower plan is reworked to reduce the north-south length by approximately 3 metres (with all towers now equal at circa. 40 metres wide), in turn this increases spacing to Goods Yard Block B.
- Changes to the vertical core materiality and expression through a reduction of vertical elements and a lighter colour tone applied to all towers. The vertical core materiality and expression is lightened through a reduction of vertical elements to the 'light grey' frame and lighter bronze colour tone infill applied to all the tower tops and cores.
- All tower top sections are reworked to reduce the north-south length by approximately 1.1 metres to 2.5 metres.
- A modest reduction in the total amount of site-wide open space by 20 sq.m., but a greater provision per residential home overall.

Topic	Refused Scheme	Revised Scheme
No. of residential homes	867	844
Density	353 units/ha	346 units/ha
Heights	27/32/29 storeys	27/31/29 storeys
Distance from Rivers Apartments	30m	33-37m
Total open space	15,650 sqm	15,630 sqm
Open space per unit	18.1 sqm	18.5 sqm
No. of family homes	147 (17%)	159 (19%)

Strategic planning issues and relevant policies and guidance

24. 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.
25. The following are also relevant material considerations:
 - The National Planning Policy Framework and National Planning Practice Guidance;
 - National Design Guide;
 - The Upper Lee Valley Opportunity Area Planning Framework (OAPF) (2013);
 - Haringey Council - High Road West Masterplan (2014);
 - Haringey Council – North Tottenham Conservation Area Appraisal & Management Plan (2017);

- Haringey Council – Bruce Castle and All Hallows Conservation Area Appraisal and Management Plan (2019);
- Haringey Council – Tottenham Cemetery Conservation Area Appraisal and Management Plan (2019);
- Enfield Council – Church Street and Fore Street Conservation Area Appraisal (2016);
- On 24 May 2021 a Written Ministerial Statement (WMS) was published in relation to First Homes. To the extent that it is relevant to this particular application, the WMS has been taken into account by the Mayor as a material consideration when considering this report and the officer's recommendation. Further information on the WMS and guidance in relation to how the GLA expect local planning authorities to take the WMS into account in decision making can be found [here](#).

26. The relevant issues, corresponding strategic policies and guidance (supplementary planning guidance (SPG) and London Plan guidance (LPG)), are as follows:

- | | |
|--|--|
| • Land use principles | <i>London Plan;</i> |
| • Housing, affordable housing and play space | <i>London Plan; Affordable Housing & Viability SPG; Housing SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG; the London Housing Strategy; Housing Design Standards draft LPG;</i> |
| • Urban design and heritage | <i>London Plan; Shaping Neighbourhoods: Character and Context SPG; Housing SPG; Public London Charter LPG; Housing Design Standards draft LPG; Optimising Site Capacity: A Design-led Approach draft LPG; Fire Safety draft LPG;</i> |
| • Inclusive access | <i>Accessible London: Achieving an Inclusive Environment SPG;</i> |
| • Climate change and sustainable development | <i>London Plan; the London Environment Strategy; The control of dust and emissions in construction SPG; Circular Economy Statements LPG; Whole Life-Cycle Carbon Assessments LPG; 'Be Seen' Energy Monitoring LPG; Urban Greening Factor draft LPG; Air Quality Neutral draft LPG; Air Quality Positive draft LPG;</i> |
| • Transport | <i>London Plan; the Mayor's Transport Strategy; Sustainable Transport, Walking and Cycling draft LPG.</i> |

Land use principles

27. The sites fall within the Lee Valley Opportunity Area and the Northumberland Park Growth Area. It is allocated for residential-led mixed use development as part of the wider site allocation 'NT5 – High Road West'. The two sites are subject to extant planning permissions as detailed above, which establish the acceptability of the residential-led mixed use redevelopment in land use terms.
28. The AAP site allocation NT5 (2017) sets out the Council's aspiration for the wider 11.7 hectare site to be developed in a comprehensive masterplan-led manner, providing a minimum indicative housing capacity of between 1,200 to 1,400 homes, including new public open space and improved community infrastructure. This development capacity figure was informed by the original High Road West Masterplan (2014) prepared by Arup and establishes a baseline minimum development capacity figure for the site.
29. 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 homes during this period. To meet these targets, Policy H1 requires potential housing capacity on suitable and available brownfield sites to be optimised, especially within PTALs 3 to 6 or within 800 metres of a station or town centre.
30. The London Plan sets an indicative capacity of 21,000 homes and 13,000 jobs across the Lee Valley Opportunity Area. London Plan Policy SD1 sets out how the Mayor will work with boroughs to ensure that opportunity areas realise their growth and regeneration potential, ensuring housing choice, employment opportunities, mixed and inclusive communities and infrastructure provision.
31. The application proposes to increase the permitted number of homes from 646 to 844 (+198 homes). A commensurate increase in the quantum of flexible commercial floorspace, play space and affordable housing over and above the extant planning permission is also proposed. The scheme would therefore make a substantial contribution towards meeting the minimum London Plan housing targets and the benchmarks for the opportunity area. The greater optimisation of the site's development potential is therefore strongly supported.
32. In summary, the further optimisation of the site's development capacity as part of a comprehensive residential-led mixed use redevelopment is strongly supported and accords with the London Plan Policies H1 and SD1.

Housing and affordable housing

33. The Mayor has set a strategic target for 50% of all new homes to be affordable, as set out in Policy H4 of the London Plan. Policy H5 of the London Plan identifies a minimum threshold of 35% affordable housing (by habitable room), with a higher threshold of 50% applied to public sector owned land and industrial sites where the scheme would result in a net loss of industrial capacity.

The Fast Track Route

34. To be eligible for the Mayor's Fast Track Route, applications must meet the applicable affordable housing threshold (by habitable room), in line with the required tenure mix without public subsidy. An early stage review mechanism would need to be secured via a Section 106 agreement. Applications which do not meet these requirements should follow the Viability Tested Route, with a Financial Viability Appraisal (FVA) submitted and schemes subject to both early and late stage review mechanisms.

Tenure split

35. In terms of tenure split, Policy H6 of the London Plan sets out the Mayor's preference for at least 30% low cost rent (social rent or London Affordable Rent) and 30% as intermediate housing products, with the remaining 40% to be determined by the Council (and comprising either low cost rented homes or intermediate based on identified need).
36. In this instance, Policy AAP3 of the Tottenham Area Action Plan (AAP) states that the Council's normal Local Plan tenure mix requirements is altered within the Tottenham AAP area where, in this specific location, the Council will seek 60% intermediate housing and 40% affordable rent accommodation.

Affordable housing threshold

37. The Depot site is in retail use (B&M store), so is subject to the 35% threshold for affordable housing. The Carberry Enterprise Park accounts for 6% of the site area of the application site and comprises non-designated industrial land, providing 1,125 sq.m. (GEA) of light industrial floorspace. This part of the site is therefore subject to the 50% affordable housing threshold. The affordable housing threshold for the remainder of the Goods Yard site was subject to discussion during the course of the previous application submitted in 2021. This part of the site has been used for various temporary purposes since then including a construction compound and car park.
38. The applicant's view is that the remainder of the Goods Yard should not be considered industrial land for the reasons which were considered in the GLA's Stage 1 and Stage 2 reports which can be found [here](#). The applicant's position is that the site should be subject to a blended affordable housing threshold of 36%, with the 50% affordable housing threshold for industrial land only applying to the Carberry Enterprise Park as summarised below.

Table 1 – The applicant's assessment of the affordable housing threshold for the site

Site component	Site area (sq.m.)	Proportion of site	AH Threshold
Carberry Industrial Estate	1,546	6%	50%
Other land	23,479	94%	35%
Total	25,025	100%	36%

Figure 3 – site components



39. In summary, the applicant's view is that the previous industrial use on the Goods Yard site ceased in 2015 and it would not now be possible to re-establish the historic industrial use as this would be contrary to the development plan. The Local Plan site allocation requires the comprehensive residential-led mixed use development of the site. The applicant has sought a legal Counsel Opinion on this specific matter, which is included in its planning submission.
40. Whilst this point is accepted on a practical level, GLA officers raised concerns with this approach on the previous planning application in the Mayor's Stage 1 report. Specifically, GLA officers made the point that temporary planning permissions should not be used to circumvent the policy and noted that the overarching rationale for the different affordable housing threshold on industrial land has to do with differences in land value, as set out in paragraph 4.5.7 of the London Plan.
41. In their 8 November 2021 Planning Committee Report on the previous application, Haringey Council planning officers concluded that the scheme should be subject to the 36% blended affordable housing threshold. In reaching this conclusion, Haringey Council officers took into account the planning history of this part of the site, the current use of the land, the legal view provided and requirements of the Site Allocation (NT5).
42. At Stage 2 GLA officers noted that there are a fairly unique set of circumstances in this case which mean that a degree of planning judgement is required to determine the appropriate affordable housing threshold in this case and in order to conclude whether or not the Goods Yard should be considered industrial land for the purposes of London Plan Policy H5. Furthermore, planning policy and guidance on this matter does not prescribe what a decision maker should do in every possible eventuality. Therefore, on balance, GLA officers do not disagree with the planning judgement taken by the local planning authority in this particular instance.

The applicant's affordable housing proposal

43. The applicant is proposing 36% affordable housing by habitable room (34% by unit). The tenure split would be 60% intermediate housing and 40% low cost rent by habitable room, with a 64:36 tenure split by unit. The proposed tenure split complies with the Tottenham Area Action Plan. The overall percentage and proposed tenure mix is consistent with the previous planning application submitted in 2021, which followed the Fast Track Route. Compared to the extant planning permissions, the application proposes 53 additional affordable homes.
44. As with the previous planning applications, the applicant has agreed that it would increase the overall affordable housing to up to 40% should grant become available. This would mirror the approach secured on the previous extant planning permission. The applicant has stated that it would welcome this being secured via a S106 planning obligation.
45. The low-cost rent tenure homes would be provided as London Affordable Rent (LAR). As with the previous planning permission, the Council would be able to elect up to 61 of the low cost rent homes to be used in association with the Love Lane Estate (with rents set at those comparable to the existing social rent tenants). The applicant has stated that this would also be secured via S106 agreement. Where these units are required by the Council for the estate regeneration decant, they would be provided as social rent tenure. This would need to be secured in the S106 agreement.

Eligibility for the Fast Track Route

46. The affordable housing proposals would meet the threshold for the site, taking into account the particular circumstances and planning history set out above. The tenure split is acceptable and in line with the Local Plan requirements and commitments relating to grant funding are proposed to be secured via S106 agreement. As such, the scheme can follow the Fast Track Route. An early stage viability review mechanism should be secured, in line with the formulas set out in the Mayor's Affordable Housing and Viability SPG.
47. S106 planning obligations should be secured to ensure the timely phasing and delivery of affordable housing linked to the occupation of market homes within the scheme.

Housing affordability

48. The low cost rent units are proposed to be let at either London Affordable Rents or social rent, which would be secured via Section 106 agreement. This is supported. The intermediate housing is proposed as shared ownership.
49. London Shared Ownership units should be affordable to households on incomes up to a maximum of £90,000 a year and a range of affordability levels should be provided below the maximum £90,000 household income cap for an initial marketing period of three months. Furthermore, all intermediate tenure households should not be required to spend more than 40% of their net income

on overall housing costs, including service charges. These requirements should be secured via Section 106 obligations.

Housing choice

50. The proposed housing mix includes a range of unit sizes, including 147 three-bedroom homes and 12 four-bedroom homes. Of the low cost rent tenure housing proposed, 49% would comprise three and four-bedroom units. The intermediate housing is weighted towards 1 and 2-bedroom units to ensure affordability, but with 19% of this tenure proposed as 3-bedroom units. This is supported and accords with the criteria set out in London Plan Policy H10.

Play space provision

51. The play space requirements for the site have been calculated using the GLA's play space calculator. The site wide requirements would be met on-site for each age category. The application proposes 2,900 sq.m. of play space. The majority of this would be provided within the public realm through public open spaces at Peacock Park, Brook House Yard, the northern and southern squares and along Embankment Lane. Additional play provision is also proposed at podium level within the blocks. This overall strategy is supported and would ensure the majority of play space is available to the public and all tenures within the scheme. There does not appear to be any segregation of play space by tenure within courtyard spaces. The application complies with London Plan Policy S4.

Urban design

Architectural and materials quality

52. The design and appearance of the proposed scheme is broadly the same as the previous refused planning application. However, a number of moderate changes to the architecture and materiality and height and massing of the three towers which are summarised earlier and shown below. The other blocks are unchanged.
53. The overall design quality of the scheme as a whole and the architectural quality of the majority of blocks was supported at Stage 1 and GLA officers considered that this would ensure the provision of a visually interesting, cohesive scheme. In relation to the three towers, further architectural and tonal refinement was required to ensure the grey clad 'top hats' and recessed inner skin of these buildings responds appropriately to the surrounding townscape and heritage context and to ensure they have a positive impact on the skyline and townscape views. During the course of the previous planning application, changes were then made to the appearance and materiality of the tower to respond to these comments and concerns raised by the local planning authority.

Figure 2 – May 2021 submission (Stage 1)



Figure 3- October 2021 refused scheme (Planning Committee / Stage 2)



54. Further design amendments have been incorporated within the revised planning application to address some of the design concerns raised by the Council's Planning Committee in their reasons for refusal. These changes are shown below.

Figure 4- March 2022 revised application



55. The towers are well-articulated in terms of their overall angled and slightly off-set plan form, scale and massing and through the differentiation of the materiality and of the tops and inner and outer skin. Whilst the 'top hats' are still an integral feature of the design of the three towers, the inner skin and outer skin has a more integrated and cohesive overall visual appearance. Although the revisions are relatively minor in scale, they would ensure that the central tower has a more slender and vertical massing and design, compared to the refused scheme. This is supported.
56. The medium density blocks would be clad in a variety of brick tones ranging from beige, red and grey, with Block E proposed to be clad in bronze metal. Appropriate levels of detailing, depth and articulation would be incorporated within the proposed elevations through recessed bay window reveals and ground floor openings, decorative brickwork and metalwork details and a variety of bronze cladding panels and balcony balustrades. This would create attractive and varied character and sense of place.
57. As such, the overall architectural and materials quality is supported and would accord with London Plan Policies D3 and D9.

Heritage impact

58. 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.
59. GLA officers have reached the following conclusions in respect of the level of harm caused to the significance of nearby heritage assets, as set out in Table 2. This follows a detailed review of the site and surroundings, noting the

existing and permitted development context and a review of the height and massing of the scheme, taking into account the potential visual, heritage townscape and landscape impact as detailed in the applicant's and Townscape and Visual Impact Assessment (TVIA) and noting the significance of the heritage assets in question as set out in the Heritage Statement.

60. GLA officers consider that less than substantial harm would be caused by the development to the significance of heritage assets arising from the height and massing of the scheme, most notably, in the case of the Grade II listed buildings closest to the site on the High Road, White Hart Lane and the North Tottenham Conservation Area. This harm must be given due weight and importance in the planning decision making process and must be outweighed by public benefits associated with the proposal. As harm would be caused to heritage assets, the application does not comply with London Plan Policy HC1.
61. In this case, the application proposes a number of public benefits. This includes the substantial quantum of housing and affordable housing, as well as public open space and publicly accessible play space provision within Peacock Park, new public routes and improved pedestrian and cycle permeability through the site and the proposed public open space. GLA officers consider that these public benefits could potentially outweigh the level of harm caused to the designated heritage assets. However, the proposed public benefits would need to be further clarified at Stage 2 and appropriately secured so these can be given full weight in the balancing exercise.

Table 2 – harm to designated heritage assets

Heritage asset	Level of harm	Scale	TVIA view
Listed buildings			
Grade II Listed 867-869	Less than substantial harm	Moderate	View 10, 11, 12
Grade II listed the Grange, 34 White Hart Lane	Less than substantial harm	Moderate	View 25
Grade II listed 797 & 799 High Road	Less than substantial harm	Moderate	View 5
Grade II listed 819-821 High Road	Less than substantial harm	Moderate	View 6
Grade II* Dial House	Less than substantial harm	Low	View 4
Conservation areas			
North Tottenham Conservation Area	Less than substantial harm	Moderate	Views 4, 5, 5N, 6
Bruce Castle Park Conservation Area	Less than substantial harm	Low	View 16
Tottenham Cemetery Conservation Area	Less than substantial harm	Low	View 18, 19, 20

62. GLA officers have considered the impact of the application on the locally listed Station Master's House which is a non-designated heritage asset. Whilst its setting would be altered, GLA officers consider that the scheme would not harm its overall significance.

Height, massing and tall buildings

63. 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.
64. In this case, 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.
65. The High Road West Masterplan Framework (2014) suggests heights of 10 to 18-storeys. The massing principles set out in the HRWMF are for taller buildings to be placed towards the railway line, following the character established by Brook House to the north. This seeks to avoid adverse impacts on the surroundings in terms of the conservation area and listed buildings, with buildings heights stepped down towards the High Road.
66. The extant planning permissions already exceeded this indicative height at 18, 22 and 29-storeys. The application would increase the height based on the extant planning permission and vary the massing moving south to north (from 18, 22 and 29-storeys in the consent) to 27, 31, 29-storeys.
67. The surrounding existing and emerging context is also relevant. There is a completed 22-storey residential tower (Brook House) immediately to the north on the site within the Cannon Road development. To the east is the new Tottenham Hotspurs Stadium which is of a significant size and scale (59 metres AOD). The wider Northumberland Development Project also includes the provision of towers ranging in height from 19, 27 and 36-storeys.
68. The siting of the three tallest elements is broadly similar to the extant planning permissions. Their location adjacent to the railway line (furthest away from the heritage assets and conservation area) is in accordance with the massing strategy set out in the High Road West Masterplan (2014).
69. A 50-metre distance would be maintained between the development and residential homes fronting Pretoria Road, with a degree of screening provided by the elevated railway and ecological corridor which includes a number of relatively mature trees.
70. The functional impact of the tall buildings has been appropriately considered in terms of their impact on the surrounding public realm in relation to active frontages, ground floor entrances and deliveries and servicing requirements.

The overall layout approach is considered to be acceptable and in line with the principles set out in London Plan Policy D9.

71. The visual impact of the towers is considered to be acceptable, taking into account the applicant's Townscape and Visual Impact Assessment (TVIA). The buildings would contribute positively to the legibility of the area and the emerging character and skyline and would not harm any designated views. Whilst there would be harm to certain heritage assets, GLA officers consider that this could, on balance, be outweighed by the overall public benefits, subject to these being appropriately secured. The architectural and materials quality is of an acceptable standard as set out in more detail above. As required by the London Plan, the design quality has been rigorously assessed through a number of design review meetings.
72. The environmental impacts in terms of daylight, sunlight, overshadowing, glare and wind microclimate have been assessed in detail. In terms of overshadowing impacts on the public realm, the BRE standards would be generally met. The daylight and sunlight levels achieved within the scheme would be acceptable, with approximately 80% of the habitable rooms compliant with the BRE daylight criteria (ADF). The associated wind impacts are considered acceptable, with a suitable pedestrian comfort levels achieved, subject to the proposed mitigation measures and the public realm. The cumulative impacts have been appropriately considered, taking into account other nearby schemes.
73. 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 would comply with the qualitative assessment criteria set out in Policy D9.

Design, layout, landscaping and public realm

74. Policies D1-D3 and D8 of the London Plan and the Mayor's Housing SPG apply to the design and layout of development and set out a range of urban design principles relating to the quality of public realm, the provision of convenient, welcoming and legible movement routes and the importance of designing out crime by optimising the permeability of sites, maximising the provision of active frontages and minimising inactive frontages.
75. The overall design and layout of the scheme accords with the master planning principles set out in the High Road West Masterplan Framework and would comply with the urban design requirements set out above. The following overarching comments are provided:
 - The permitted scheme for the Goods Yard site included a main public / shared surface route to the rear of blocks running adjacent to the railway embankment to the west of the site. In the current proposal, this area of the site would be revised to comprise 'Goods Yard Walk' – a linear communal green space for residents. The main route through the site would be moved

to the east adjacent to the Peacock Industrial Estate. The proposals would ensure a more legible and better connected public realm, with additional public open space and a clearer route through the site for pedestrians and cyclists, better connecting the proposed Peacock Park with White Hart Lane.

- When entering the site from the south, pedestrians would be led through White Hart Gateway, a new Southern Square, through to Embankment Lane and then on to a Northern Square linking to Peacock Park. The taller buildings would terminate views along these routes to assist wayfinding and legibility, with active ground floor frontages proposed in the form of duplex / maisonette units with front doors, communal residential entrances to mansion blocks and some flexible commercial uses. These design changes create a much better front to back relationship, ensuring a more clearly defined and legible public realm and are therefore strongly supported.
- The ground and first floor level of the scheme would create a strong relationship with the public realm ensuring good levels of overlooking and ownership and activation fronting Peacock Park, the north and south square, the spaces to the rear of the Station Master's House and the proposed pocket square. Bins and cycle stores would be internalised where possible to avoid these having a negative impact on the quality of the public realm. Residential units would also line the Goods Yard walk to the rear of the site, with this route likely to be closed during evening hours, but open during daytime.
- The proposals would also ensure the adjacent Peacock Industrial Estate (which turns its back on the proposed Embankment Lane) can be maintained without its operation or functionality being in any way compromised, whilst also ensuring it can be brought forwards in the future and plug into the proposed street network in a comprehensive manner, in line with the aspirations set out in the HRW Masterplan and Local Plan.
- Existing mature London Plane trees on the High Road at the entrance to the Depot site would be retained, which is strongly supported. This would ensure a mature and well-established landscaped entrance to the site from the High Road into the Depot site.
- The landscaping and public realm proposals for Embankment Lane, Pickford Lane and the first phase of Peacock Park are supported and would ensure a high quality public realm which is generously landscaped and pedestrian and cycle friendly. The scheme ensures footway on both sides of the Embankment Lane at the main entrance from White Hart Lane, which is welcomed.

Residential quality

76. Overall, the scheme proposes approximately 54% dual aspect units. No north facing single aspect units are proposed. There are 19 south facing single aspect units, with the remaining single aspect homes all being east and west facing. The larger units (3 and 4-bedrooms) all appear to be dual aspect which

is welcomed. A number of duplex / maisonettes are proposed over ground and first floor levels. These would have their own front gardens and front door entrances, with private rear gardens provided at podium level. This is strongly supported.

77. Taking into account the particular site circumstances and the proposed density, GLA officers are satisfied that the provision of dual aspect units has been maximised in line with London Plan. Potential noise, air quality, overheating and air quality issues should be addressed and mitigated appropriately. Conditions should be secured to ensure the proposed mitigation measures are incorporated in the completed scheme.
78. The core arrangement and unit to core per floor ratio is acceptable and accords with the Housing SPG benchmark. Private amenity space is proposed for all units in the form of balconies and terraces. Overall, the application complies with London Plan Policy D6 and the residential quality is acceptable.

Optimising development capacity and design review

79. London Plan Policy D3 requires the optimisation of sites by following a design-led approach, having regard to site attributes, local context, design principles, public transport accessibility and the capacity of existing and future transport services. The higher the density of a development, the greater the level of design scrutiny that is required, particularly qualitative aspects of the development design as described in London Plan Policy D4.
80. The Policy D4 requirement for additional design scrutiny is triggered in this instance, as the scheme contains tall buildings and would have a density of 380 dwellings per hectare and comprises a number of tall buildings. A number of design reviews have been undertaken at pre-application stage, as detailed in the applicant's Planning Statement, together with numerous pre-application meetings with Havering Council planning and design officers and the GLA. This design-led approach complies with the above strategic policies.
81. The proposal for comprehensive high density scheme on this site is in line with the principles set out in the London Plan and Local Plan, taking into account the site location, PTAL and noting the overall layout, design quality and residential quality and response to the existing and emerging context. The proposals would optimise the development capacity of the site in accordance with the London Plan.

Fire safety

82. A fire statement has been prepared by a third party suitably qualified assessor and submitted as part of the planning application, as required by London Plan Policy D12. This covers a range of fire safety related matters including: building materials and construction; means of escape and evacuation, including evacuation lifts; fire safety systems (including suppression, detection and alarm systems) and smoke control measures; measures to prevent fire spread in terms of external walls; and fire brigade access and facilities. Sprinkler protection is proposed throughout the

development in all dwellings, car parks, plant and refuse stores and non-residential uses. Compliance with the submitted fire strategy and the provision of fire evacuation lifts in each building core should be secured by condition.

Inclusive design

83. The application complies with the accessible housing standards in the London Plan Policy D7, with a good range of wheelchair accessible unit sizes proposed across the housing tenures and types. This should be secured by condition. The landscape design statement demonstrates that the proposed public realm would be of a high quality in terms of landscaping, materials and inclusive access with appropriate provision of seating spaces and acceptable widths and gradients proposed. This complies with London Plan Policy D5.

Digital connectivity

84. 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.

Transport

Site access and delivery and servicing arrangements

85. As with the refused planning application, the primary point of access by all modes to the southern part of the site is provided from White Hart Lane approximately at the same location of the existing crossover into The Goods Yard. This access route leads into a no through north-south internal route terminating at the northern end of The Goods Yard. The access route to the northern part of the site is proposed to be retained in the same location as the consented scheme, via the western arm of the signal-controlled junction with High Road and Brantwood Road.
86. Whilst the improved public realm and access arrangement along the southern access route, which provides continuous footways on both sides of the route could be supported, a Stage 1 Road Safety Audit (RSA) should be completed at this point of access prior to determination.
87. The internal route will provide direct access to a number of individual cycle stores via the dedicated building cores. The proposal seeks to accommodate basement parking facilities through ramp arrangements access via a signal control system to manage movements (The Goods Yard) and give way arrangements / convex mirrors for intervisibility (The Depot) in order to control turning movements. As previously alluded to, the entrance points should not impact safety or impede vehicle or pedestrian flow in any way.

88. The internal route comprises a shared surface access route allowing access to accommodate servicing, deliveries, refuse collection and emergency vehicles along a route otherwise only open to pedestrians and cyclists, with limited private vehicles associated with residential car parking. A Stage 1 Road Safety Audit (RSA) along this access route should also be completed prior to determination.

Healthy Streets and Vision Zero

89. The Transport Assessment (TA) includes an Active Travel Zone (ATZ) assessment and a Healthy Streets Check for Designers (HSCD) for highway works. The proposal and revised uplift above the extant planning permissions will see an increase in pedestrian and cycle trips to/from the site and the local area. Whilst the improved design outcome for pedestrians at the southern end of the Goods Yard and integration of the future park space to the east and the High Road are welcomed, the TA falls short of showing how the development will deliver local improvements that support the ten Healthy Streets indicators and Vision Zero approach in the wider area, particularly in relation to connectivity for cyclists within the local area towards the Cycleway 1 (CS1) and the southern section of the masterplan area.
90. The applicant should assess this issue in more detail in consultation with the local highway authority and TfL officers, particularly the need to mitigate development impacts by upgrading, filling gaps in and/or increasing permeability and connectivity by cycling at the southern end of the site and adjacent local area, and to commit to providing enhanced cycle environments/on street cycling facilities. An action plan with the local planning and highway authority should be agreed to ensure the development enhances cyclists experience and make the wider area more attractive for cycling and better connect the site. This should be secured through condition and/or an appropriate legal agreement.

Cycle parking

91. A total of 1,661 cycle parking spaces are proposed, including long and short stay spaces for residential units, as well as non-residential parking spaces. This is in line with the London Plan standards. However, officers have some concerns about the quality of the cycle parking. This includes an insufficient number of accessible cycle parking spaces/Sheffield stands, an excessive number of proposed internal doors which need to be negotiated by users and spacing between stands/racks and walls, particularly within Blocks D and E of the Goods Yard site. Push-button controls to assist with door opening should be provided.
92. All cycle parking is required to be designed and laid out in accordance with the London Cycling Design Standards (LCDS), including at least 20% Sheffield stands and further 5% wider spaces for non-standard bicycles. Provision of showers, lockers and changing facilities for cyclists associated to non-residential uses should be provided. Further work is required to address officer concerns and subsequently the provision should be secured by condition.

Car parking

93. A total of 145 car parking spaces (a ratio of 0.17 spaces per residential unit) would be provided off/on street. This car parking provision includes 87 disabled persons' parking bays and four car club spaces. This is in line with extant permissions and complies with London Plan Policy T6.1.
94. The London Plan requires 20% of parking to be fitted with active electric vehicle charging infrastructure, with passive provision for all remaining spaces. This should be applied and secured by condition.
95. A Car Parking Management Plan (CPMP) will support the parking, which is strongly supported. Control Parking Zone (CPZ) permit free agreement should also be secured as part of the S106 agreement.

Trip generation and highway and public transport impact

96. The methodology used to assess trip generation, including the cumulative impact assessment, is acceptable. The application is unlikely to have a significant impact on the strategic road network. No mitigation is required at White Hart Lane station given the effect of the recent congestion relief project that was completed at this station. Bus trip generation figures have been reviewed by TfL to determine where bus service improvements are expected to be required in the future.
97. Bus trip generation figures reveal that the proposals, including the revised uplift and additional trips for the High Road West Masterplan (HRWM) site as a whole will generate a cumulative bus demand of 258 and 251 two-way trips in the AM and PM peak periods respectively. There are existing capacity issues on the local bus network specifically affecting routes W3, 149 and 259 which are important routes providing key east-west and north-south connections tying different parts of Haringey together. As such, a financial contribution towards bus service improvements is required, including but not limited to capacity enhancements, to accommodate the net new demand and mitigate the cumulative impacts of development in the local area.
98. Consistent with other developments, this contribution is calculated based on the additional net demand generated by the development, and the proportion of the overall capacity of a double-decker bus (75 passengers) that this additional demand represents; and the total cost to provide an additional bus over a period of 5 years (£487,500). Based on the forecasted net demand (30), a contribution of £195,000 $[(487,500 \times 30) / 75]$ towards bus services improvements is therefore sought. Appropriate trigger points should be discussed and agreed to ensure that the timing of payments fits in with the phasing of construction and occupation of this development in relation to the rest of the HRWM site.

London Overground Infrastructure Protection

99. Infrastructure asset protection and operational protection related conditions are likely to be required given the proximity of the site to the railway lines.

Travel plan

100. The applicant has submitted a framework Travel Plan, which sets out specific objectives in support of London Plan policy. The focus on encouraging active modes (walking and cycling) and facilitating opportunities to achieve a healthy lifestyle for all users is welcomed. The final Travel Plan and all agreed measures should be secured, enforced, monitored and reviewed through the Section 106 agreement, in accordance with London Plan Policy T4.

Deliveries and Servicing and Construction Logistics

101. The draft Delivery and Servicing Management Plan (DSMP) and outline Construction Logistic Plan (CLP) are acceptable. However, the applicant should confirm the proposed phasing of construction and occupation in relation to the rest of the masterplan site. The CLP should also be aligned with major stadium events.

Sustainable development

Energy strategy

102. Based on the applicant's energy strategy, the proposed development would achieve a 79% reduction in carbon emissions on the residential element above baseline Building Regulations, with the non-residential element achieving a 54% reduction in carbon emissions. This exceeds the minimum 35% on-site requirement for reductions in carbon emissions which are set out in the London Plan.
103. The proposed efficiency measures would achieve a 7% reduction in carbon emissions on the residential element and a 10% on the non-residential element. This falls short of the minimum on-site energy efficiency targets in the London Plan (which are 10% and 15% respectively). As such, additional energy efficiency measures should be considered and incorporated within the final design of the blocks within the scheme, in accordance with London Plan Policy SI2.
104. The energy strategy is predicated on connection to the wider planned district heat network (DHN) which is under construction at Meridian Water (the Ecopark energy centre, Energetik). Based on the discussions which have been undertaken with the DHN provider Energetik, the applicant has stated that connection to the DHN would be possible from 2023 via connection at Fore Street to the north of the North Circular and confirming that the network could have the capacity to serve the new development. This approach is strongly supported, in accordance with the Policies SI2 and SI3 of the London Plan and should be secured via the S106 agreement or conditions. Further correspondence between the applicant and DHN provider Energetik should be provided to verify the potential to connect the site to the DHN and cater for the site's heat requirements.

105. The potential for solar panels to be incorporated within the available roof space has been assessed which shows that 533 solar panels (944 sq.m.) could be accommodated, with plans provided to demonstrate this. This approach is acceptable and further details should be secured by condition.
106. The risk of overheating within residential units and communal corridor spaces has been assessed. This has needed to take into account the noise constraints associated with the site's close proximity to the elevated railway line and the need for acoustic design mitigation measures. A mechanical ventilation with heat recovery system is proposed and all of the residential units would benefit from openable windows. Ceiling fans are recommended to address extreme heatwave events. This is generally acceptable, subject to further details being secured by condition.
107. London Plan Policy SI2 requires the energy performance of completed developments to be monitored, verified and reported following construction ('Be Seen').
108. The remaining reductions in carbon emissions required to ensure compliance with the London Plan zero carbon target should be secured via a financial contribution / carbon off-set payment. This should cover both the residential and non-residential elements and should be calculated based on the recommended price per tonne, as set out in the London Plan.

Whole Life Carbon

109. In accordance with London Plan Policy SI2 the applicant is required to calculate and reduce whole life-cycle carbon (WLC) emissions to fully capture the development's carbon footprint.
110. A Whole Life Carbon Assessment has been undertaken in accordance with the London Plan. 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 detailed design stage. This further review should be secured via pre-commencement condition.
111. A condition should be secured requiring the applicant to submit a post-construction assessment to report on the development's actual WLC emissions. The template and suggested condition wording are available on the GLA [website](#)¹.

Circular Economy

112. Policy D3 requires development proposals to integrate circular economy principles as part of the design process. London Plan Policy SI7 requires

¹ <https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance/whole-life-cycle-carbon-assessments-guidance>

development applications that are referable to the Mayor of London to submit a Circular Economy Statement, following the Circular Economy Statements LPG.

113. A Circular Economy Statement has been submitted which 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 reusability, adaptability, flexibility and longevity. This is supported and complies with London Plan Policy SI7.
114. A condition should be secured requiring the applicant to submit a post-construction report. The template and suggested condition wording are available on the GLA [website](#)².

Environmental issues

Urban greening, trees and biodiversity

115. Policy G5 of the London Plan requires new development to contribute towards urban greening. Policy G7 requires development proposals to ensure that, wherever possible, existing trees of value are retained and that the loss of trees as a result of development is mitigated through the provision of replacement trees of an adequate value. Policy G6 states that development proposals should manage the impact on biodiversity and aim to secure net biodiversity gain.
116. A range of urban greening methods are proposed as part of the applicant's landscape strategy. Wetland habitat and open water areas are proposed within the ecological corridor (Goods Yard Walk). Within the public realm a range of street trees, rain gardens, flower rich perennial planting beds, hedges and lawns are proposed, together with permeable paving. Intensive and extensive green roofs are proposed within podium gardens. GLA officers are satisfied that the landscape strategy is well-considered and has generally maximised the potential for urban greening within the site. The applicant has undertaken an Urban Greening Factor (UGF) assessment which demonstrates that the scheme would achieve an overall UGF score of 0.45. This exceeds the London Plan target, which is strongly supported.
117. The vast majority of the existing site comprises hard-standing and buildings. There are existing trees lining the west of the site within the railway embankment, which falls within a locally designated ecological corridor. A large number of these trees fall outside the application site boundary and ownership area. In addition, there are a number of mature London Plane trees located on the High Road at the entrance to the Depot site. All of the mature London Plane trees would be retained, which is strongly supported. This complies with the requirements of London Plan Policy G7.

² <https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance/circular-economy-statement-guidance>

118. An ecological appraisal has been undertaken. This identifies the existing landscape embankment and woodland area running alongside the railway to the west as being of the highest ecological value. This area would be largely retained and enhanced as an ecological corridor through the introduction of Goods Yard Walk and the proposed landscape and habitat improvements. This is strongly supported.
119. The applicant's ecological report concludes that there would be a net increase in the number of trees and habitat areas within the site, with the proposed new trees and amount of habitat areas proposed exceeding those which are lost as part of the development. The report concludes that the development would enhance the site from the existing baseline conditions in terms of biodiversity, ensuring net biodiversity gains overall.
120. Details of the proposed landscaping and biodiversity improvements should be secured, as well as the recommended mitigation measures. Subject to appropriate conditions being included, the application accords with London Plan Policy G6 in terms of managing the impacts on biodiversity and ensuring net biodiversity gain.

Sustainable drainage and flood risk

121. A range of sustainable urban drainage systems (SuDs) are proposed within the site to attenuate and reduce surface water run-off and contribute to urban greening and biodiversity, in accordance with the London Plan. This includes rain gardens, tree pits, swales, bioretention areas and planting beds, permeable paving and geo-cellular below ground water attenuation tanks (with a total volume of 2,492 cubic metres). This overall strategy is supported and accords with the drainage hierarchy in the London Plan. Details should be secured by condition.

Noise

122. The western part of the site, where GY Blocks A, B, F and Station Master's House and Depot Blocks ABC would be located suffers from railway noise. The eastern and southern parts of the site, where GY Block and the Station Master's House and Depot Blocks E and F would be located, suffers from traffic noise from the High Road. The Peacock Industrial Estate is also to the east.
123. Sound insulation measures are required on these blocks to ensure that the internal noise environment of these blocks meets the relevant WHO and British standards in terms of insulation and glazing. Mechanical ventilation is also recommended to be installed for these blocks, so that windows can be kept closed whilst also ensuring an acceptable temperature during summer months. The assessment also identifies the need for the inclusion of an acoustically attenuated facade louvres on some of the facades to address the risk of overheating. These have been incorporated into the proposed detailed design.
124. This complies with London Plan Policies D13 and D14. Details of the proposed glazing, mechanical ventilation and louvres should be secured by way of a planning condition.

Air quality

125. The application's Air Quality Assessment includes an Air Quality Neutral Assessment and an Air Quality Positive Statement. The risk of exposure to poor air quality has been considered. The Assessment finds that the site, including the High Road and White Hart Lane frontages, would be below air quality objective levels, meaning the site as a whole is considered acceptable for housing and no specific mitigation is required. Homes would also have a Mechanical Ventilation with Heat Recovery (MVHR) system (with the need to open windows limited to purge scenarios), but with the choice to open windows.
126. The proposed scheme would be 'Air Quality Neutral' in terms of emissions associated with transport and buildings. The public realm prioritises pedestrian and cycle movement, with a relatively low car parking level and with electric charging provision in line with the London Plan. The proposed connection to an off-site District Energy Network means that there would be no onsite emissions from boilers. The application therefore complies with London Plan Policy SI1.

Local planning authority's position

127. Haringey Council planning officers are currently assessing the application and are targeting a Planning Committee in due course.

Legal considerations

128. 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

129. There are no financial considerations at this stage.

Conclusion

130. London Plan policies on housing, affordable housing, play space, urban design, tall buildings, heritage assets, transport, energy, climate change, urban

greening, biodiversity and trees are relevant to this application. The application does not fully comply with these policies, as summarised below:

- **Land use principles:** Further optimisation of the site's development potential (over and above the extant planning permission) is supported as part of a comprehensive residential-led mixed use scheme.
- **Housing and affordable housing:** 36% affordable housing (by habitable room) comprising 40% low cost rent and 60% intermediate housing is proposed, with provision for the overall quantum of affordable housing to be increased to 40% affordable housing with grant. The proposed tenure split complies with the Tottenham Area Action Plan. The blended affordable housing threshold for the site would be met. The affordability of intermediate housing and phasing of affordable housing should be agreed and secured together with an early stage review mechanism.
- **Urban design:** The layout, landscaping, density and residential quality is supported. Tall buildings are proposed in a location which is identified as suitable for tall buildings. The same number of towers is proposed as the extant permission but with an increase in height and changes to the massing arrangement. The scheme generally complies with the qualitative assessment criteria in Policy D9 in respect of visual, functional, environmental and cumulative impacts.
- **Heritage:** The scheme would cause less than substantial harm to a number of designated heritage assets. As such, the public benefits associated with the application will need to outweigh this harm. This could be the case in this instance, subject to these benefits being secured at Stage 2 and further clarification on a number of issues.
- **Transport:** A £195,000 contribution towards bus service enhancements is required. Stage 1 Road Safety Audits (RSA) should also be undertaken. Further discussion is required in relation to healthy streets improvements in the wider area. Cycle parking should be secured in line with the minimum quantitative standard in the London Plan and in line with the London Cycling Design Standard. Further discussion is required in relation to the design of cycle parking stores. A Car Parking Management Plan and car parking permit free obligation should be secured. Delivery and Servicing Plan, Construction Logistics Plan and Travel Plans should be secured.
- **Climate change and environmental issues:** The energy, urban greening and drainage strategies are acceptable. The applicant is proposing to connect the site to the planned Lee Valley District Heat Network. This is strongly supported and should be secured. Details of the proposed noise mitigation measures should be secured via condition.

For further information, contact GLA Planning Unit (Development Management Team):

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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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MINUTES OF MEETING Planning Sub Committee HELD ON Monday, 24th May, 2021, 7.00 pm

PRESENT:

**Councillors: Sarah Williams (Chair), Dhiren Basu, John Bevan,
Luke Cawley-Harrison, Sheila Peacock, Reg Rice, Viv Ross, Yvonne Say
and Liz Morris**

ALSO ATTENDING:

1. FILMING AT MEETINGS

The Chair advised that the meeting was to be live streamed on the Council's website.

2. PLANNING PROTOCOL

Noted.

3. APOLOGIES

Apologies for absence were received from Councillors Adamou, Hinchcliffe and Mitchell.

Councillor Morris was in attendance as substitute for Councillor Hinchcliffe.

4. URGENT BUSINESS

None.

5. DECLARATIONS OF INTEREST

None.

6. PPA/2020/0025 - 29-33 THE HALE, N17 9JZ

The Committee considered the pre-application briefing for the demolition of existing buildings and construction of a part 7, part 24 storey building to provide 600sqm retail floorspace (Class E uses) accommodation at base; and 473 rooms of purpose-built student accommodation with communal amenity & ancillary spaces above; ancillary uses to student housing at ground level, with associated cycle parking & refuse storage at basement level; and associated landscaping and public realm works (elements of which will provide servicing and disabled drop off).

The applicant team responded to questions from the Committee:

- In terms of communal space, there was a gym on the 1st floor, a large lounge with kitchen, study and seating areas on the 7th floor and a large lounge at the top of the building. There was 50-60% more amenity space than in recent student schemes.
- The building was planned to be 24 storeys high. Daylight and sunlight studies had been carried out and the building would not block the light to the hotel at the opposite end of the block.
- The applicant did not currently own the site – if planning permission was granted then the purchase of the site would be completed.
- A 6-8 week consultation had been carried out, and there had been very limited feedback from local residents.
- On the lower floors there was one kitchen between six bedrooms and two kitchens to 20 bedrooms on the upper floors.
- A monetary donation would be made to the park, and the applicant would like to have a hand in the design for landscaping the street areas with the Council.
- The walls of the building would be 50cm thick, with high spec double glazed windows, which should block out the noise of the busy road junction.
- There were 16 bike spaces at ground floor level, along with secure parking in the basement.
- The site allocation plan indicated that the site was suitable for commercial use. The masterplan required all applicants to complete a commercial strategy to ensure there was a mix of commercial and residential.
- The scheme would be carbon neutral, car free and would connect to the energy network which would be available from 2024 (the scheme would complete in 2025).
- There would be two sets of stairs in the building. The building would have sprinklers and the fire safety strategy designed by experts. The safety standards would exceed current regulations and meet regulations due to be implemented at the end of the year.
- The affordable housing contribution proposal was to provide 35% of rooms at a discounted rate to make them more affordable for students. However, the Council's preference was for a financial contribution to be made for offsite affordable housing in the borough.

The Chair thanked the applicants for attending.

7. PRE/2021/0027 - 3 SITES IN TOTTENHAM, N17:

The Committee considered the pre-application briefing for the Depot & Goods Yard sites combined (Sites (a) and (b)) and The Printworks (Site (c)). A Listed Building Consent application is also proposed for Nos. 819-821 High Road, which forms part of The Printworks site.

The applicant team responded to questions from the Committee:

- The development had been designed in such a way to ensure that the three buildings were part of a 'family' of buildings which added layers to the local area.

By increasing the height of the buildings, more public space had been created at ground level.

- The team had ensured that a 'landing spot' would be made available onto Spurs land if any future applications as part of the wider masterplan included a bridge link to the railway station.
- The affordable housing contribution was expected to be slightly higher than 35%.
- The development would be connected to the decentralised energy network and would be very close to zero carbon.
- The stairwells had been agreed with fire engineers, and all buildings would have sprinklers. The details for this would be signed off at Building Control stage.
- 4500 homes in Haringey and Enfield had been consulted with, and two public webinars held to present the scheme. Some changes had been made following consultation.
- There would be no vehicle connection from one end of the scheme to the other, therefore eliminating 'rat runs'.
-

Members commented that the first building looked enormous from street level and did not feel sympathetic to the area at all. From the West it looked like a huge wall of blocks, and out of scale for the area. It was also felt that the three different colours would make the development look municipal. Members also added that 27 storeys as opposed to 18 was a cause for concern.

The Chair thanked the applicants for attending.

8. DATE OF NEXT MEETING

27 May 2021 (on the rise of the Council AGM) – Strategic Planning Committee (to approve the membership of the Planning Sub-Committee)

7 June 2021, 7pm – Planning Sub-Committee

CHAIR: Councillor Sarah Williams

Signed by Chair

Date

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Development Management Forum 25 May 2021 – (a) The Depot (Nos. 867-879 High Road & B&M store & land to rear); (b) The Goods Yard (Nos. 36 & 44-52 White Hart Lane & land to rear) and (c) The Printworks (Nos. 819-829 High Road & land to rear).

Updated overall proposals are: Refurbishment of High Road & White Hart Lane frontage buildings (although demolition of No. 829). New buildings of 4 to 32-storeys to provide approx. 940 homes (mix of private & affordable), with commercial uses on some ground floors. Plus, a new park, streets/open spaces, cycle & car parking.

A virtual MS Teams Development Management (DM) Forum was held on 25th May at 7:00 PM.

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):

- Building heights, location, design & impacts
- Relationship with LB Haringey/Lend Lease emerging proposals
- Affordable Housing
- Number of homes, dwelling mix & quality
- Loss of business space
- Child yield & infrastructure
- Heritage considerations & proposed loss of No.829 High Road
- Car parking
- Access to proposed open space
- Construction impacts
- District Energy Network & low carbon energy
- Programme

Relationship with LB Haringey/Lend Lease emerging proposals

- How do these proposals relate to those by Lend Lease for approx. 2,600 homes? Does Spurs intend to act as developer? What levels of public subsidy are expected? What discussions have there been with owners of the Peacock Industrial Estate? Applicant response: These are separate proposals from Lend Lease. It would be Spurs and/or a private developer and the only expected public subsidy relates to possible grant to help deliver affordable housing. Spurs leases a unit of the Industrial Estate and has met with owners at the Business & Community Liaison Group and individually. There is a need to comply with the London Plan 'agent of change' principle (not prejudicing continued use of the Estate).

Building Heights, location, design & impacts

- Proposed additional height was a 'step too far.' Northern most tower would be approx. 40% closer to Riverside Apartments than the approved tower. Appreciate that residents do not have a right to a view, but proposed location and spacing of the proposed three towers appears to favour future residents (they should be in a line). Applicant response: Reduction in height to proposed northern block made following discussions with residents, proposed podium building next to boundary lower than consented, lower buildings to help ensure appropriate wind conditions, each tower (including Riverside Apartments) would be spaces approx. 30m apart – details to be set out in application).
- Proposed towers look over bearing.
- Proposed towers would 'stick out like sore thumbs' – why not more subtle?
- On western side of site – what would overshadowing impacts be on proposed open spaces?
- Concerns about fire safety – design materials and management.
- Applicant response: Proposed towers sit broadly where identified in the adopted Masterplan. They would help 'optimise' development potential and free up land for open space as part of a design-led approach – there would be intensification, but not doubling. Detailed design & materials are still under development. Location, height and shape of proposed towers has been informed by initial overshadowing studies to ensure they meet guidelines – planning application will be supported by detailed studies. Design incorporates non-combustible cladding, evacuation & fire lifts & sprinklers – proposals need to comply with London Plan Policy D12 and (from 1 August) the Health & Safety Executive is to be a statutory consultee.

Affordable housing

- Where is the social housing?
- What is proposed split of different types of affordable housing?
- Applicant response: Aim is to submit a 'scheme that provides 35% affordable housing (rising to 40% if grant), based on 40:60 split (low cost rented and shared ownership). Opportunity to help facilitate decant of residents in Love Lane Estate.

Number of homes, dwelling mix & quality

- How many homes would there be?
- What would the dwelling mix be?
- Concern at lack of family housing.
- How big would the homes be?

- Concern about loss of families in the borough and effect this is having on communities, school rolls etc. Reports of London losing 800,000 people during pandemic (bigger issue, not just this scheme).
- Quality needs to be high if family-sized private homes are to sell.
- Applicant response: Currently proposed 867 homes on Goods Yard and Depot and 70 on Printworks. Goods Yard = 97 x 1-bed, 214 x 2-bed, 53x3-bed and 4, x 4-bed. Depot = 141 x 1-bed, 268 x 2-bed, x3-bed and x 4-bed. Overall, 17% family (3-bed+) sized homes for private and affordable homes. These would all be additional, as no existing homes would be lost. Sizes of homes and bedrooms would meet London Plan standards.

Loss of business space and non-residential uses

- Concern at loss of 'old industries' and replacement with cafés and bars.
- The development is referred to as a new 'neighbourhood', but there is not much proposed for families.
- Applicant response: Peacock Industrial Estate would remain in 'meanwhile' condition, application would allow for some business/employment and child care facilities as well as jobs from food & beverage uses.

Child yield & infrastructure

- No mention of children. What about play areas?
- How has 'child yield' been calculated? Is LBH developing its own methodology?
- What about local infrastructure – is Spurs looking for Lend Lease to provide?
- What about health facilities?
- Applicant response: Updated GLA calculator has been used to estimate child yield. Proposed dedicated play areas (including Northern and Southern Squares and Peacock Park) as well as in communal podium spaces (approx. 2,900sqm), designed aimed at different age ranges plus incidental play opportunities. CIL & s106 financial contributions would be paid to help provide additional social infrastructure.
- Officer response: LBH was considering an alternative child generation approach, but this was pre updated GLA calculator. Principle of proportionate payments established at Goods Yard Public Inquiry would be applied.

Heritage considerations & proposed loss of No.829 High Road

- Concern at proposed loss of No.829 High Road – no justification other than to make a wider road.
- Strong objection to the above, plus proposed works to White Hart Lane buildings.

- Query as to how sensitive potential impacts on 'heritage assets' are balanced with potential impacts on people
- Applicant response: Avoiding harm to 'heritage assets' is an important policy consideration. However, so too is safeguarding residential amenity – including relationship with Riverside Apartments. A balance is needed.

Car parking

- What would parking levels be – sounds like less than approved?
- How many car club spaces would there be?
- Applicant response: Approved levels of residential car parking = 0.16 for Depot and 0.25 for the Goods Yard. The proposed level of residential parking for the combined site is 0.16. The Printworks would have a ratio of just 0.1. Four car club spaces are proposed (two on Goods Yard and two on The Depot).

Access to proposed open space

- Would the proposed western green walkway be open to the public?
- Would it improve biodiversity?
- The importance of open space is a lesson from the COVID pandemic.
- Applicant response: The walkway would be a secured area, open to all residents on the Goods Yard site only (the proposed streets, squares and park would be the public spaces). Intention for this area to be biodiversity rich.

Construction impacts

- Concern at adverse impacts during demolition/construction – including cumulative impacts.
- Applicant response: Expect impacts to be managed by management plan, secured by planning condition.

District Energy Network & low carbon energy

- What about District Energy Network (DEN) – would there be different networks for Lend Lease? Some DENs have not performed well/expensive for residents (e.g. Sutton). What is fall back? Need to maximise on-site renewables.
- Heat from waste is not zero carbon (involves burning plastics etc.)
- With increase in recycling, there may not be enough waste in the future.
- The private communal heat network for the Cannon Road development is not successful. They are not regulated by OFGEM, residents are stuck in a contract and have had to fight to get contract delivered.

- Applicant response: Looking at two potential DEN connections, with PVs also being proposed (together with very high building insulation and façade design to minimise overheating). Targeting Net Zero Carbon.
- Officer response: s106 obligations likely to require connection or additional carbon offsetting contributions if not. Officers are actively pursuing DEN options for the borough and will be briefing Members shortly. Private DENs are not regulated, but the Government is considering bringing in regulations. Where the Council commissions or operates, it is likely to maintain a degree of control (e.g. price & performance standards)

Programme

- What is the programme?
- Applicant response: Submission of Goods Yard/Depot planning application very soon. This application would have a 16-week statutory determination period (could be longer). Printworks application to follow. Current anticipated earliest start on site = Quarter 2022.

Meeting concluded at 8.45 PM
GH 26.05.2021

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CONFIDENTIAL**London Borough of Haringey Quality Review Panel****Report of Formal Review Meeting: High Road West Developments**

Tuesday 15 December 2020

Video conference

Panel

Peter Studdert (chair)

Esther Everett

Paddy Pugh

Andy Puncher

Lindsey Whitelaw

Attendees

Rob Krzyszowski	London Borough of Haringey
Dean Hermitage	London Borough of Haringey
Robbie McNaugher	London Borough of Haringey
Richard Truscott	London Borough of Haringey
Graham Harington	London Borough of Haringey
Elisabetta Tonazzi	London Borough of Haringey
Deborah Denner	Frame Projects
Carolina Eboli	Frame Projects
Penny Nakan	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.

CONFIDENTIAL**1. Project name and site address**

High Road West, Tottenham. Three interrelated sites within the High Road West local plan allocation comprising:

- The Goods Yard, 36 and 44-52 White Hart Lane, Tottenham
- 867-879 High Road, Tottenham
- 819-829 High Road, Tottenham

2. Presenting team

Richard Serra	Tottenham Hotspur Football Club
Adrian Ball	F3 Architects
Alan Carruthers	F3 Architects
Ian Laurence	F3 Architects
James Beynon	Quod
David Liversey	Re-form Landscape Architecture
Mark Shilton	Re-form Landscape Architecture
Edgar Kiviet	Arup
Sophie Cambrun	Arup

3. Planning authority briefing

The proposals relate to three sites owned by Tottenham Hotspur Football Club on the west side of the High Road: Sainsbury / B&Q (798-808 High Road); the Banqueting Suite (819-829 High Road); and the Goods Yard. All are within a Growth Area and Site Allocation NT5 (High Road West) as identified in the Tottenham Area Action Plan.

There are existing planning approvals for the Sainsbury / B&Q site, and for the Goods Yard. The current proposals represent a significant increase in the height and number of tall buildings proposed. They also differ from the High Road West Masterplan Framework, published September 2014, which is undergoing an update process.

The current development proposals include:

- The Goods Yard, 36 and 44-52 White Hart Lane, Tottenham: a residential-led, mixed-use development comprising circa 500 homes within three towers alongside associated commercial uses and public realm, and the retention (including change of use) of 52 White Hart Lane (Station Master's House).
- 867-879 High Road: demolition of the existing buildings and erection of a new residential building of up to circa 39 storeys.
- 819-829 High Road: retention/restoration of the High Road properties, the demolition of the rear buildings/structures and the erection of a residential-led scheme of circa 86 homes.



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Officers asked for the panel's views on the scheme's relationship with and contribution to a wider masterplan approach to the High Road West Area, in terms of its layout, scale, massing, and design quality of the proposed buildings. Comments were also sought on the relationship with the heritage context, the proposed access and street network, and the quality of the open spaces.

4. Quality Review Panel's view

Summary

The panel recognises the complexity of the High Road West development sites, each of which have their own constraints. Nevertheless, the opportunity exists for the three sites to work well both individually and together. However, in the absence of an overall masterplan, the panel has significant concerns about the proposed density and heights. It recommends that these should be reduced to be more closely in accordance with the 2014 High Road West Masterplan Framework and previous planning approvals. The panel's view is that the 29-storey tall building permitted on the 819 - 829 High Road site should not be exceeded. The provision of amenity and open space should be reviewed against the standards required by both the London Plan and by Haringey Council. The panel would also like to see the scheme be better integrated with its historic surroundings and urges the design team to put these assets at the heart of the proposals.

An alternative route may be to work in collaboration with Haringey Council to develop a comprehensive scheme, using land assembly powers to allow the creation of a single masterplan including the Peacock Industrial Estate. If planned as one, there may be potential for density greater than the High Road West Masterplan Framework and existing permissions, supported by generous provision of public realm and green space. This would also provide different opportunities for access and integration with the heritage context.

The panel recommends a thorough review of several strategic issues before detailed design work begins and these issues are set out in greater detail below.

Massing and development density

- The panel does not feel that a convincing case has been made for the density and massing proposed. It notes that the current proposals deviate from the High Road West Masterplan Framework.
- The panel's view is that the 29-storey tall building permitted on the 819 - 829 High Road site should not be exceeded.
- The 39 storeys now proposed would require special justification, such as being located at a major transport interchange such as Tottenham Hale, which is not the case on this site.



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- The sites are in close proximity to existing residential neighbourhoods, and historic buildings along the High Road. It is not yet clear how these have informed the character of the development proposal.
- The panel does not think that the towers permitted as part of the nearby Tottenham Stadium justifies development of the density and height proposed for these sites. Its support for tall buildings adjacent to the stadium was given on the basis of their landmark function, marking an important civic building. This rationale would not apply to the High Road West sites.
- The proposed heights would affect the setting and views of the area's historic assets and would cause significant harm to the setting of the Tottenham High Road Conservation Area. The panel therefore recommends that the existing permission for 29 storeys be regarded as a maximum.
- There needs to be a rigorous investigation of the impact of tall buildings on the character and environment of the area, including sunlight and wind studies.
- The 8-storey building at the back of the site at 819-829 High Road appears detrimental to the historic character of the area and should be rethought to address the more human scale of its context.

Place-making, character, and integration

- The panel would like to see further thought given to the relationship between the scheme and its immediate context. The proposals should integrate with their surroundings, including nearby residential communities.
- The panel welcomes the re-use and repair of the heritage buildings, particularly those along the High Road, and the commitment to understand their history. These heritage assets should underpin the character of the scheme, especially for the 819-829 High Road site, and should inform the buildings' massing.
- Further consideration should be given to the demolition of part of the locally listed building at 823-829 High Road. This extension contributes to the character of the Conservation Area and its removal will impact on the street frontage.
- The scheme should explore ways of enhancing the existing historic alley leading to Brunswick Square, without demolition to widen this to become a street.
- The proposed roof extensions and Herald Yard development on the 819-829 High Road site should be sympathetic to the adjacent heritage buildings. There is not yet enough information to judge how successful this element of the scheme will be.



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- Where tall buildings are proposed, these should start from an understanding both of how people live and work and what the place will feel like. A focus on liveability will help to humanise the proposals.
- The panel welcomes the focus on the pedestrian experience at the southern end and the entrance from White Hart Lane. However, the 18-storey tower next to it will compromise the intended human-scale character.

Layout and amenity space

- The panel would like to see a robust assessment of the amount of amenity space to be provided, to demonstrate that this is compliant with standards set out in the London Plan and by Haringey Council.
- The amenity and open spaces designed should be focused on serving the local neighbourhood areas.
- Given the density of the scheme, the panel is concerned that the mix of uses within the courtyards, such as bike stores and bins, will reduce their capacity to provide sufficient amenity space.
- The panel is concerned that the scheme may currently rely on the possible future redevelopment of the Peacock Industrial Estate to deliver the appropriate provision of amenity and play spaces - and does not think this would be an acceptable approach.
- Relocating the buildings in the Goods Yard site towards the railway line and the road to the east is a positive move. However, careful thought will be needed about how maintenance access alongside the railway is designed, to avoid creating a space that is unused and feels unsafe.

Architecture

- The panel recognises the proposals are at an early-stage and that the architectural expression is yet to be developed.
- It welcomes the quality of the precedents presented but highlights that these are not drawn from contexts in TfL Zone 3 with 100% residential use, as proposed here. It would be helpful to refer to precedents which reflect similar uses, contexts, and scales to the surroundings of the site.

Overall masterplan

- As an alternative to bringing forward planning applications for three independent, yet related, sites - the applicant could work with Haringey Council to develop a comprehensive scheme. Land assembly powers could be used to acquire the adjacent land and allow a single integrated masterplan for the entire area, including the Peacock Industrial Estate.



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- This would enable the proposed increase in density to be better understood, as well as the provision of adequate amenity and open spaces.
- The access strategy for 819-829 High Road site could also be reviewed within an overall masterplan.

Next steps

- The panel would welcome a further opportunity to review the proposals. It highlights a number of action points for consideration by the design team, in consultation with Haringey officers.



CONFIDENTIAL**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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CONFIDENTIAL**Haringey Quality Review Panel****Report of Formal Review Meeting: High Road West Developments**

Tuesday 18 May 2021

Video conference

Panel

David Ubaka (chair)

Esther Everett

Tim Pitman

Andy Puncher

Paddy Pugh

Attendees

Robbie McNaugher

London Borough of Haringey

Elisabetta Tonazzi

London Borough of Haringey

Katerina Koukouthaki

London Borough of Haringey

Richard Truscott

London Borough of Haringey

Graham Harrington

London Borough of Haringey

Sarah Carmona

Frame Projects

Kiki Ageridou

Frame Projects

Apologies / report copied to

Rob Krzyszowski

London Borough of Haringey

John McRory

London Borough of Haringey

Phillip Elliot

London Borough of Haringey

Dean Hermitage

London Borough of Haringey

Deborah Denner

Frame Projects

Confidentiality

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1. Project name and site address

Two interrelated sites / applications within the High Road West Local Plan allocation, comprising:

- The Goods Yard, 36 and 44-52 White Hart Lane and The Depot, 867-869 High Road, Tottenham;
- The Printworks, 819-829 High Road, Tottenham.

2. Presenting team

Richard Serra	Tottenham Hotspur Football Club
Ian Laurence	F3 Architects
Sean Bashforth	Quod
Richard Coleman	Citydesigner
Ignus Froneman	Cogent Heritage
David Livesey	Re-form Landscape Architecture

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 proposals relate to three interrelated sites, owned by Tottenham Hotspur Football Club, on the west side of the High Road: the Depot (formerly known as Sainsbury / B&Q, 867-869 High Road), the Goods Yard site (36 and 44-52 White Hart Lane) and the Printworks site (formerly known as the Banqueting Suite, 819-829 High Road). Parts of all three sites are within the North Tottenham Conservation Area and include – or are adjacent to – a number of heritage assets. All are within a Growth Area and Site Allocation NT5 (High Road West), as identified in the Tottenham Area Action Plan. Policy SP1 requires that development in Growth Areas maximises site opportunities, provides appropriate links to, and benefits for, surrounding areas and communities, provides the necessary infrastructure, and is in accordance with the full range of the Council's planning policies and objectives. Site Allocation NT5 calls for a masterplanned, comprehensive development that creates a new residential neighbourhood and leisure destination for London. It sets out a number of relevant requirements and development guidelines.

The most up-to-date masterplan is the High Road West Masterplan Framework, published September 2014. This highlights opportunities for improvement and change in the NT5 area and identifies where housing, open space and play areas, as well as community, leisure, education and health facilities and shops, could be provided. Tottenham Hotspur Football Club intends to submit two separate 'full' planning



applications: one for the Depot and Goods Yard combined and one for the Printworks. Previous planning permissions for the sites include: 330 residential units, a shop/café (A1/A3) and area of public open space for the Depot site (September 2020); 316 residential units, employment (B1 use), retail (A1 use), leisure (A3 and D2 uses) and community (D1 use) uses for the Good Yard site (June 2019); and historic permissions for the Printworks site.

Officers seek the panel's consideration of the proposed density and consequent 'liveability' issues, the acceptability of the three proposed towers (including the reduction from 39 to 32-storeys for the middle tower), the proposed tower architecture, and the relationship with existing High Road and White Hart Lane buildings. Comments are also sought on the access and heights strategy for the proposed Printworks scheme, and the proposed loss of the locally listed 829 High Road to create a wider Brunswick Square, as part the proposed Printworks scheme.

5. Quality Review Panel's views

Summary

The Quality Review Panel welcomes the opportunity to review the proposals for High Road West, and thanks the project team for a very comprehensive and clear presentation. It highlights that the masterplan is a significant development project and will potentially deliver a very large number of homes; in this regard, it will be important for the panel to consider the individual buildings and spaces within the masterplan, including the relationship to the conservation area and heritage assets at a much greater level of detail at future review meetings.

The panel is very pleased to see how well the project team has responded to comments made in the previous review in December 2020. The scale and massing of the two sites is improved; the panel welcomes the removal of the fourth tower, and the reduction in height of the remaining three towers. While the central tower remains higher than the 29-storey threshold, the panel feels that this could be acceptable, subject to further design refinements. The overall organisation of the site and the network of routes seems to be successful, and the initial proposals for Goods Yard Walk show promise. Further work to improve the legibility of the east-west route and to create a stronger visual link to the pedestrian and cycle route westwards beyond the railway would be welcomed.

As design work continues, the panel would encourage further consideration of the architectural form, language, and materiality of the towers and the lower buildings across both sites, in addition to improvements in the configuration and layout of the individual buildings to maximise the quality and liveability of the accommodation. Consideration of low / zero carbon design and environmental sustainability principles should also underpin and inform key decisions about orientation, layout, three-dimensional form, elevational treatments and materiality; the panel feels that these aspects should be reinforced as the proposals evolve.



Scope for improvement also remains within the landscape and public realm proposals, which should seek to create special, distinctive, and characterful places while helping to establish and support a sense of community. Further consideration of public and private realms and the interface between the two would be supported.

As the panel considers that the proposals are likely to harm the setting and views of the conservation area, a broader programme of enhancements to the conservation area should be established and agreed, in consultation with officers.

Further details on the panel's views are provided below.

Scope of the review

- Due to the quantity of information presented within the limited time of a single review, discussion was focused mainly at a strategic level. It was not possible for the panel to look at the different parts of both sites in detail; it would welcome the opportunity to consider the material further, as design work continues.

Massing and development density

- The panel welcomes the removal of one of the four towers from the previous scheme, which enables a more balanced distribution of massing within the site.
- The reduction in height of the remaining towers is also supported, from 18/27/36/39 storeys (as presented to the panel in December 2020) to 27/32/29 storeys (running south to north). While the panel considers that a more appropriate threshold for the tower heights would be 29 storeys, as established in the existing consent for 867-879 High Road, it thinks that the revised tower heights within the proposals presented at review could be acceptable, subject to amendments and refinements to the detailed design, three-dimensional form, language and setting (at ground level) of the towers, outlined below.
- The northern tower with adjoining 'shoulder' buildings (the Depot) is the least successful of the towers; it lacks the elegance of proportion of the others as its footprint is wider. The junctions with the adjoining buildings also feel awkward, as they appear to 'collide' with the tower. Further consideration of the footprint and configuration of the tower and shoulder blocks would be supported.
- The Depot building forms one of the edges of the northernmost section of Peacock Park, and of the Northern Square. The building footprint has extended southwards towards the adjacent site, and now sits very close to the boundary. This relies on the neighbouring development not to build up to the boundary to avoid significant negative impacts upon the public realm. The panel would encourage further consideration of this problematic shoulder



building, in terms of three-dimensional massing and footprint, in addition to scenario planning if the scheme to the south fails to come forward, to ensure that the development will function well as a 'stand-alone' scheme.

- The building heights of the lower blocks across the two sites seem to be reasonable; however, the panel notes that it would like the opportunity to consider the proposals in further detail in terms of three-dimensional form and detailed design of the individual blocks, as this was not possible due to time constraints within the review.

Masterplan, public realm and landscape design

- At a strategic level, the panel feels that the overall organisation of the site and the street network is generally working well. The north-south route is well-considered, providing an attractive landscaped route through the site, and the location of the three towers close to the railway – and away from the High Road - seems sensible. The east-west route requires further consideration, as it lacks clarity and does not provide a clear and visible link through to the pedestrian link westwards across the railway.
- The design of the public realm will be extremely important; each open space will require its own design process, to ensure that each site becomes a distinctive, characterful, and high-quality place.
- This will be particularly relevant to the design of Brunswick Square. If the width of the space is increased by removing part of the building adjacent and setting back the building line, then this provides opportunities for a special landscape design approach in this important space that provides a key link between the High Road and the site. Consideration of the potential uses of this space would be welcomed, as this would help to define and enliven this important piece of public realm.
- The panel welcomes the creation of Goods Yard Walk at the western fringe of the site, adjacent to the railway, and feels that the terraced landscaping that steps down from the buildings into the space will be very successful.
- It understands why Goods Yard Walk has been identified as private amenity space for the residents immediately adjacent, but regrets that it is not possible to open it up – in part or in whole – to the public.

Conservation area and heritage assets

- A key question concerns the extent of the impact of the towers on the setting and views of the conservation area. Some of the images presented at review show that they will be visible – which will lend a different scale and character to the area, in contrast to that of the conservation area itself. The panel has concerns that there is potential for the towers to overwhelm the setting of buildings on the High Road. It concludes that there is likely to be some harm



to the conservation area, and in this regard, there should be a discussion about the benefits and enhancements that could offset this anticipated harm.

- There is clear national guidance that the applicant is required to demonstrate proposed enhancements that will serve to offset anticipated harm, and the panel notes that it is not yet clear what the scope of these enhancements will be. It understands that repairs to 823-829 High Road are proposed as enhancements; however, in a scheme of this size and importance the panel would expect a broader programme of further enhancements to the conservation area in mitigation of the harm caused by proposed development.

Architectural expression and building configuration

- The panel feels that some of the precedent images presented at review are lacking in richness, and don't represent the best examples. Alternative precedents could better inform the scheme's visual approach and architectural expression.
- It would encourage the design team to adopt a more coherent approach to the design of the three towers, so that they are perceived as a group. It welcomes the inclusion of glazed bricks within the elevations, but feels that the colour palette and visual language across the three towers could be closer in tone and substance, to increase the similarity while adopting subtle variations. It highlights that the Barbican towers are very successful as a group, which successfully strike a balance between similarity and subtle difference.
- Further consideration of the visual language, architectural form, materiality, and tone of the central white 'core' of accommodation within each tower would also be supported, to reduce the visual conflict with the main body of each tower. The panel understands the desire to reduce the scale of the upper floors of accommodation; however, it feels that the white 'pop-up' central core presents too much contrast with the form and texture of the richly articulated and coloured façades of the towers below.
- Due to time constraints within the review meeting, the panel has outstanding questions and comments. It was unable to consider the architectural expression, form, configuration, and layout of the lower buildings across both sites, and it feels that these should be subject to further detailed review meetings.
- It would like to know more about the rationale behind the different architectural forms and themes across both sites, and how these relate to the local context and character. It is not clear how the visual language has developed, and where the rationale for pitched roofs, flat roofs or ribbons originates.
- More information about the configuration and layout of the different buildings would also be welcomed. The panel wonders whether the lower blocks all have corridors, and questions whether there might be opportunities to



incorporate deck access, which could enable dual aspect, high-quality living environments.

- The three-dimensional form and architectural language of the shoulder buildings of the Depot would benefit from further consideration, to mitigate the awkward visual junction with the tower block and to achieve a less aggressive, calmer expression.
- The panel would encourage the design team to rigorously test the proposals for each individual building to ensure that the accommodation is of high-quality and 'liveable', in terms of what it might be like to live and work there. This should include consideration of individual dwellings, communal areas, circulation spaces and wayfinding. Good access to daylight and sunlight (in dwellings and circulation spaces) will be very important in this regard.

Low / zero carbon design and environmental sustainability

- The panel would like to know more about the strategic and detailed approach to low / zero carbon design and environmental sustainability within the scheme. Following its Climate Emergency Declaration in 2019, Haringey Council adopted the Climate Change Action Plan in March 2021, which identifies a route map to enable the borough to become Net Zero Carbon by 2041. All new development coming forward should have regard for these requirements to avoid the need for retrofitting later, and proposals should demonstrate how they comply with these targets.
- Consideration of operational energy requirements should start with a 'fabric first' approach – optimising the performance and design of the building envelope, components, and materials to achieve sustainable and energy-efficient design. Utilising renewable energy sources, natural light, cross ventilation, and nature should form part of this work. A low / zero carbon approach to design should inform the earliest strategic design decisions and should be part of the ongoing narrative as a scheme evolves.
- The panel feels that the current proposals do not seem to respond to environmental conditions. It would like to see these considerations – including orientation, layout, wind profiling, window sizes, u-values of the external envelope, and solar gain - informing the detailed design of the scheme, at both an urban scale and in regard to the design of individual buildings and dwellings.
- It would also encourage greater rigour within the evolving floorplans, designing from the 'inside out' as well as the 'outside in'. There appear to be limited numbers of dual aspect apartments, and the number of single aspect accommodation should be minimised. The development should aspire to being an exemplar in terms of quality of accommodation, as well as low / zero carbon design.



- At a detailed level, the configuration of fenestration is also very important; vertically orientated windows are less efficient than horizontally orientated windows, especially in terms of daylight penetration into rooms.

Next steps

- The panel highlights a number of action points for consideration by the design team. It would welcome further opportunities to review the proposals in detail, as design work continues.
- It expresses concern about the quantity of material being covered in a single review. It highlights that multiple reviews will be needed, to allow time for adequate consideration of the tower buildings, the lower buildings, the squares, open spaces, the design of the public realm, and the relationship to the conservation area and heritage assets. It would like to look at each building in detail.
- It also offers a focused chair's review specifically on the approach to low carbon design and environmental sustainability, if required.



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;
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 - 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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Haringey Quality Review Panel

Report of Formal Review Meeting: High Road West Developments

Wednesday 8 September 2021
Video conference

Panel

Hari Phillips (chair)
Paddy Pugh
Andy Puncher
David Ubaka
Lindsey Whitelaw

Attendees

Rob Krzyszowski	London Borough of Haringey
Robbie McNaugher	London Borough of Haringey
John McRory	London Borough of Haringey
Elisabetta Tonazzi	London Borough of Haringey
Richard Truscott	London Borough of Haringey
Graham Harrington	London Borough of Haringey
Sarah Carmona	Frame Projects
Zainab Malik	Frame Projects

Apologies / report copied to

Phillip Elliot	London Borough of Haringey
Deborah Denner	Frame Projects

Confidentiality

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 Developments, The Goods Yard (36 and 44-52 White Hart Lane) and The Depot (819-829) High Road West, Tottenham.

2. Presenting team

Richard Serra	Tottenham Hotspur Football Club
Ian Laurence	F3 Architects
James Beynon	Quod
Xenia Georgiou	Citydesigner
Ignus Froneman	Cogent Heritage
Mark Shelton	Re-form Landscape Architecture

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 proposals relate to two sites owned by Tottenham Hotspur FC (THFC) on the west side of the High Road: the Depot (formerly known as Sainsbury/ B&Q) (Nos. 867-869 High Road) and the Goods Yard site (Nos. 36 and 44-52 White Hart Lane). Parts of the sites are within the North Tottenham Conservation Area and include – or are adjacent to – a number of heritage assets. Both are within a Growth Area and Site Allocation NT5 (High Road West), as identified in the Tottenham Area Action Plan (AAP). Policy SP1 requires that development in Growth Areas maximises site opportunities, provides appropriate links to, and benefits for, surrounding areas and communities, provides the necessary infrastructure, and is in accordance with the full range of the Council's planning policies and objectives. Site Allocation NT5 calls for a masterplanned, comprehensive development that creates a new residential neighbourhood and leisure destination for London. It sets out a number of relevant requirements and development guidelines.

The most up-to-date masterplan is the High Road West Masterplan Framework, published September 2014. This highlights opportunities for improvement and change in the NT5 area and identifies where housing, open space and play areas, as well as community, leisure, education and health facilities, and shops, could be provided. THFC has submitted a full planning application for the combined Goods Yard and Depot (HGY/2021/1771), comprising 867 homes and 1,878sqm of commercial space, including three residential towers (27, 32 and 29 storeys). Previous planning permissions for the sites include: 330 residential units, a shop/café (A1/A3) and area of public open space for the Depot site (September 2020); 316 residential units,



employment (B1 use), retail (A1 use), leisure (A3 and D2 uses) and community (D1 use) uses for the Good Yard site (June 2019).

Officers seek the panel's consideration of the proposed density and consequent 'liveability' issues, the architectural expression of the proposed towers, and the form, configuration, layout and architectural expression of the proposed lower buildings. Comments are also sought on the quality of proposed publicly accessible open spaces and public realm, and the proposed relationship with existing High Road and White Hart Lane buildings.

5. Quality Review Panel's views

Summary

The Quality Review Panel welcomes the opportunity to review the proposals for High Road West, and thanks the project team for a very comprehensive and clear presentation. While the scope of the review was limited primarily to consideration of the tower buildings due to time constraints, the panel supports the strategic approach to the masterplan, and thinks that in general terms, the architectural expression of the low-rise buildings is well-considered.

The height and scale of the three towers will have a significant visual impact on the North Tottenham Conservation Area and the setting of buildings on the High Road, and the panel feels that further work is required to refine their massing, form and proportion. Further consideration should also be given to the relationship between the towers and the plinth / shoulder buildings, as well as the way in which the towers meet the ground. The panel also feels that the entry sequence, the quality and configuration of the internal accommodation, and architectural expression of the towers should be improved; importantly, the design of the facades and the configuration of the accommodation should be underpinned by their relationship to the site, in particular the environmental factors. In addition, given the impact of the towers, the panel would like to see how this impact is being offset through the public benefit to be provided by the scheme.

While it thinks that the design of the streets and spaces are very promising, the panel is concerned that the increase in residential units within the current proposals – in comparison to the consented scheme – will increase pressure on the proposed amenity space to an unacceptable level.

In light of the scope of the amendments recommended for the tower buildings, in tandem with concerns over the quantum of public open space and play space provision for the proposed development density, the panel is not able to offer support for the planning application as it stands. Further details on the panel's views are provided below.



Scope of the review

- Due to time constraints within the review, the panel were unable to consider the lower-rise buildings or the landscape proposals for the streets and open spaces at a detailed level.

Masterplan, public realm and landscape design

- At a strategic level, the panel feels that the overall organisation of the site and the street network works well in general.
- At the previous review, the panel asked the project team to look at creating distinctive spaces which could establish and support a sense of community, in addition to carefully considered public and private realms, and the interface between them. It feels reasonably comfortable that these aspirations have been achieved.
- The panel understands that the quantum of play space / public open space provided within the consented scheme does not meet the Council's requirements. While this approach was accepted in the extant planning permission for the site, it understands that the current scheme proposes an additional c.220 units above the consented scheme, which will result in an even greater shortfall and will put additional pressure on the amenity space. As these proposals will only deliver the northernmost section of Peacock Park, it questions whether this will further exacerbate the problem.

Conservation area and heritage assets

- As discussed at the previous review, the panel has concerns that there is potential for the towers to overwhelm the setting of buildings on the High Road, and concludes that there is likely to be some harm to the conservation area.
- The height, scale and impact of the three towers requires that they should be of sufficient quality and the development as a whole should deliver sufficient public benefit within the overall planning balance. The panel is not yet convinced that the quality of the towers is sufficient, and it is not yet clear what the extent of the public benefit will be. This requires further consideration by the project team and Haringey officers.

Massing and development density

- The panel understands that the three towers have remained at the same height since the previous review – 27/32/29 storeys, running from south to north. At the previous review, it identified that these tower heights could be acceptable, subject to amendments and refinements to the detailed design, three-dimensional form, language and setting (at ground level) of the towers.



- The panel notes that the three-dimensional form of the towers is unchanged from the previous review. The building footprints, width, height and proportion of the towers remain significantly larger than those of the consented scheme, which has resulted in a reduction in space between the towers.
- This will have the effect of significantly reducing the area of sky visible between the towers, increasing the amount of built form on the skyline, and being perceived as one entity when viewed from certain angles.
- The panel therefore feels that the towers need to reduce in width, to have a more elegant proportion and to increase the amount of space between the towers from the important east and west viewpoints.

Architectural expression and building configuration

- The panel would encourage further refinement of the form and proportion of the towers to avoid a visually bulky profile and to respond better to the nature of the site and local context.
- The top sections of the towers would benefit from further consideration, to add more visual interest and to lighten the 'crown' of the towers.
- The width of the towers should be reduced, to render a more elegant profile and allow greater space in between the buildings: the 'cloak' element does not successfully disguise the width of the buildings and in any case the overall form still appears bulky and inelegant when seen from the east and west.
- The panel is not convinced by the interface between the tower buildings and the lower-rise plinth or shoulder buildings that sit beneath them. Visually the towers appear to 'crash down' onto the lower buildings, or grow out of the roofs. As a result the entrances to the towers do not have the correct emphasis or hierarchy in the streetscape appropriate to their scale. The towers should meet the ground confidently, have their own entrances, and be more assertive within the groundscape. The northern and central towers both have a very awkward junction with the adjoining shoulder buildings that appear to collide with the base of the tower.
- Further consideration of the configuration of these buildings – to give greater visual integrity to all three towers as they meet the ground – would be welcomed, as would work to explore the entry sequence and the visual experience of identifying, approaching and entering each tower. The panel notes that there is little information within the presentation about how the current proposals meet the ground, and the nature and detail of the entrances.
- The panel would like to see further consideration given to the building aspect ratio and number of units per floor. It would also encourage greater rigour within the floorplans, designing from the 'inside out' as well as the 'outside in', as discussed at the previous review. In addition, the number of single aspect



accommodation should be minimised.

- The panel welcomes the calmer approach to the detailed design of the coloured facades, including the simplified panels and aligned windows. Nevertheless, the panel feels that more rigour could be applied to the design of the facades by considering the specific relationship to the site, such as aspect and views, and environmental factors such as wind and solar aspect.
- It feels that simplifying the colour palette and using different shades of the same colour tones on the three different buildings would be more successful than including blue glazed bricks on one of the towers. The panel feels that shades of terracotta could work well across the three towers.
- While the lighter central core elements serve as a visual reference to the materiality of the existing tower adjacent (Rivers Apartments), it feels that further consideration of the composition of this part of the façade is required, to give a more human scale to the architectural expression, and to avoid the appearance of an office building.

Low / zero carbon design and environmental sustainability

- The proposals do not respond sufficiently to the environmental conditions of the site. These considerations – including orientation, layout, wind profiling, window sizes, u-values of the external envelope, and solar gain – should inform the detailed design of the scheme, at both an urban scale and with regard to the design of individual buildings and dwellings.

Next steps

- The panel highlights a number of action points for consideration by the design team, in consultation with Haringey officers.
- It offers a focused chair's review specifically on the approach to low carbon design and environmental sustainability if required.



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Document	Reference	Date of Report
Affordable Housing Statement	n/a	February 2022
Air Quality Assessment	HRW-BHE-GD-XX-RP-YI-0002, Revision P02	17.02.2022
Air Quality Positive Statement	HRW-BHE-GD-XX-RP-YI-0001, Revision P01	17.02.2022
Arboricultural Assessment	CC37-1030	February 2022
Basement Impact Assessment (Update)	HRW-BHE-GD-XX-RP-CG-0003, Revision 00	19.05.2023
Circular Economy Statement	HRW-BHE-GY-XX-RP-YZ-GY-0001, Revision 01	18.02.2022
Circular Economy Statement - Statement of Conformity	HRW-BHE-GY-XX-RP-YZ-GY-0001, Revision 00	19.05.2023
Cover Letter		19.05.2023
Design and Access Statement	GYARD-F3-ZZ-ZZ-RP-A-0001	February 2022
Design and Access Statement - Addendum	GYARD-F3-ZZ-ZZ-RP-A-0002	May 2023
Drainage Strategy	HRW-BHE-GD-XX-RP-CI-0001, Revision 00	18.02.2022
Environmental Statement	Q200705	February 2022
Environmental Statement - Addendum	Q200705	May 2023
Ecological Appraisal Report	HRW-BHE-GD-XX-RP-YM-0011, Revision P01	17.02.2022
Ecological Appraisal Report (Update)	HRW-BHE-GD-XX-RP-YM-0011, Revision P01	19.05.2023
Fire Statement	HRW-BHE-GD-XX-RP-YD-XXXX, Revision P00	12.05.2023
Flood Risk Assessment	HRW-BHE-GD-XX-RP-CW-0003, Revision 00	18.02.2022
Gateway 1 Fire Form	n/a	12.05.2023
Internal Daylight and Sunlight Report	20647, Version 1.0	26.05.2023
Land Contamination Assessment (Phase I) (Update)	HRW-BHE-GD-XX-RP-CG-0002, Revision P00	18.05.2023
Noise Impact Assessment	HRW-BHE-GD-XX-RP-YA-0001, Revision P01	18.02.2022
Noise Impact Assessment - Addendum	HRW-BHE-GD-XX-RP-YA-0001, Revision P00	19.05.2023
Planning Statement	Q200691	February 2022
Regeneration Statement	n/a	February 2022
Site Construction Management Plan	V03	09.02.2022
Statement of Community Involvement	n/a	February 2022
Sustainability and Energy Statement	HRW-BHE-GD-XX-RP-YS-0001, Revision P00	18.02.2022
Sustainability and Energy Statement - Addendum	HRW-BHE-GD-XX-RP-YS-0001, Revision P00	19.05.2023
Transport Assessment	278880-ARP-XX-XX-RP-T-000007	18.02.2022
Transport Assessment - Addendum	278880-ARP-XX-XX-RP-T-000008	19.05.2023
Utilities Statement	HRW-BHE-GD-XX-RP-CI-0003, Revision 00	18.02.2022
Waste Management Plan	278880-ARP-XX-XX-RP-W-000001	19.05.2023

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THE GOODS YARD DRAWING REGISTER							GYARD-F3-ZZ-ZZ-RG-A-0001							DATE: 17/05/2023							
Drawing Number							Drawing Title							Issue		Revision		Sheet Size		Date	
GYARD	F3	ZZ	EX	ST	A	2052	EXISTING BLOCK PLAN							ISSUED FOR PLANNING		A2.P1		A1		18/02/2022	
GYARD	F3	ZZ	B1	GA	A	82100	PROPOSED GA BASEMENT PLAN							ISSUED FOR PLANNING		A2.P5		A1		12/05/2023	
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GYARD	F3	ZG	ZZ	EL	A	82516	BLOCK G PROPOSED GA MATERIALS ELEVATION STUDY							ISSUED FOR PLANNING		A2.P2		A1		12/05/2023	
GYARD	F3	ZH	ZZ	EL	A	82517	BLOCK H PROPOSED GA MATERIALS ELEVATION STUDY							ISSUED FOR PLANNING		A2.P1		A1		18/02/2022	
GYARD	F3	ZC	ZZ	EL	A	82518	BLOCK C - PROPOSED GA MATERIALS ELEVATION STUDY 2							ISSUED FOR PLANNING		A2.P2		A1		12/05/2023	
GYARD	F3	ZD	ZZ	EL	A	82519	BLOCK D - PROPOSED GA MATERIALS ELEVATION STUDY 2							ISSUED FOR PLANNING		A2.P2		A1		12/05/2023	
GYARD	F3	ZE	ZZ	EL	A	82520	BLOCK E - PROPOSED GA MATERIALS ELEVATION STUDY 2							ISSUED FOR PLANNING		A2.P2		A1		12/05/2023	
GYARD	F3	ZF	ZZ	EL	A	82521	BLOCK F - PROPOSED GA MATERIALS ELEVATION STUDY 2							ISSUED FOR PLANNING		A2.P2		A1		12/05/2023	
GYARD	F3	ZG	ZZ	EL	A	82522	BLOCK G - PROPOSED GA MATERIALS ELEVATION STUDY 2							ISSUED FOR PLANNING		A2.P2		A1		12/05/2023	
GYARD	F3	ZH	ZZ	EL	A	82523	BLOCK H - PROPOSED GA MATERIALS ELEVATION STUDY 2							ISSUED FOR PLANNING		A2.P1		A1		18/02/2022	
GYARD	F3	ZSMH	ZZ	EL	A	82524	SMH PROPOSED GA MATERIALS ELEVATION STUDY							ISSUED FOR PLANNING		A2.P1		A1		18/02/2022	
GYARD	F3	ZA	ZZ	DR	A	82550	BLOCK A PROPOSED GA ELEVATION DETAIL - EAST ENTRANCE							ISSUED FOR PLANNING		A2.P2		A1		12/05/2023	
GYARD	F3	ZA	ZZ	DR	A	82551	BLOCK A PROPOSED GA ELEVATION DETAIL - NORTH SHOULDER							ISSUED FOR PLANNING		A2.P2		A1		12/05/2023	
GYARD	F3	ZA	ZZ	DR	A	82552	BLOCK A PROPOSED GA ELEVATION DETAIL - SOUTH SHOULDER							ISSUED FOR PLANNING		A2.P2		A1		12/05/2023	
GYARD	F3	ZA	ZZ	DR	A	82553	BLOCK A PROPOSED GA ELEVATION DETAIL - WEST ARTICULATION							ISSUED FOR PLANNING		A2.P2		A1		12/05/2023	
GYARD	F3	ZA	ZZ	DR	A	82554	BLOCK A PROPOSED GA ELEVATION DETAIL - EAST ARTICULATION							ISSUED FOR PLANNING		A2.P2		A1		12/05/2023	
GYARD	F3	ZA	ZZ	DR	A	82555	BLOCK A PROPOSED GA ELEVATION DETAIL - SOUTH FAÇADE TOP							ISSUED FOR PLANNING		A2.P2		A1		12/05/2023	
GYARD	F3	ZB	ZZ	DR	A	82556	BLOCK B PROPOSED GA ELEVATION DETAIL - EAST ENTRANCE							ISSUED FOR PLANNING		A2.P2		A1		12/05/2023	
GYARD	F3	ZB	ZZ	DR	A	82557	BLOCK B PROPOSED GA ELEVATION DETAIL - NORTH SHOULDER							ISSUED FOR PLANNING		A2.P2		A1		12/05/2023	
GYARD	F3	ZB	ZZ	DR	A	82558	BLOCK B PROPOSED GA ELEVATION DETAIL - SOUTH FAÇADE TOP							ISSUED FOR PLANNING		A2.P2		A1		12/05/2023	
GYARD	F3	ZB	ZZ	DR	A	82559	BLOCK B PROPOSED GA ELEVATION DETAIL - WEST ARTICULATION							ISSUED FOR PLANNING		A2.P2		A1		12/05/2023	
GYARD	F3	ZB	ZZ	DR	A	82560	BLOCK B PROPOSED GA ELEVATION DETAIL - WEST ARTICULATION STEP							ISSUED FOR PLANNING		A2.P2		A1		12/05/2023	
GYARD	F3	ZZ	ZZ	SE	A	82600	BLOCK A&B GA PROPOSED SECTIONS							ISSUED FOR PLANNING		A2.P2		A1		12/05/2023	
GYARD	F3	ZZ	EX	ST	A	89000	SITE LOCATION PLAN							ISSUED FOR PLANNING		A2.P1		A1		18/02/2022	
GYARD	F3	ZZ	EX	EL	A	89001	EXISTING SITE ELEVATIONS 1							ISSUED FOR PLANNING		A2.P1		A1		18/02/2022	
GYARD	F3	ZZ	EX	EL	A	89002	EXISTING SITE ELEVATIONS 2							ISSUED FOR PLANNING		A2.P1		A1		18/02/2022	
GYARD	F3	Z1	0	GA	A	89003	PROPOSED GA USE PLAN ZONE 1							ISSUED FOR PLANNING		A2.P3		A1		12/05/2023	
GYARD	F3	ZZ	0	GA	A	89004	PROPOSED GA USE PLAN ZONE 2							ISSUED FOR PLANNING		A2.P3		A1		12/05/2023	
GYARD	F3	ZZ	EX	ST	A	89005	DEMOLITION GA PLAN							ISSUED FOR PLANNING		A2.P1		A1		18/02/2022	
GYARD	F3	ZZ	EX	EL	A	89006	DEMOLITION GA ELEVATIONS							ISSUED FOR PLANNING		A2.P1		A1		18/02/2022	
GYARD	F3	ZZ	ZZ	SE	A	89007	SITE WIDE PROPOSED GA SECTION HH							ISSUED FOR PLANNING		A2.P2		A1		12/05/2023	
GYARD	F3	ZZ	ZZ	SE	A	89008	SITE WIDE PROPOSED GA SECTIONS AA & BB							ISSUED FOR PLANNING		A2.P2		A1		12/05/2023	
GYARD	F3	ZZ	ZZ	SE	A	89009	SITE WIDE PROPOSED GA SECTIONS CC & DD							ISSUED FOR PLANNING		A2.P2		A1		12/05/2023	
GYARD	F3	ZZ	ZZ	SE	A	89010	SITE WIDE PROPOSED GA SECTIONS EE & FF							ISSUED FOR PLANNING		A2.P2		A1		12/05/2023	
GYARD	F3	ZZ	ZZ	SE	A	89011	SITE WIDE PROPOSED GA ILLUSTRATIVE MATERIALS STUDY - SOUTH & WEST SECTIONS							ISSUED FOR PLANNING		A2.P2		A1		12/05/2023	
GYARD	F3	ZZ	EX	ST	A	89012	PROPOSED SITE BLOCK PLAN							ISSUED FOR PLANNING		A2.P2		A1		12/05/2023	
GYARD	F3	ZZ	RF	GA	A	89013	PROPOSED SITE ROOF PLAN							ISSUED FOR PLANNING		A2.P2		A1		12/05/2023	
GYARD	F3	ZZ	ZZ	SE	A	89014	SITE WIDE PROPOSED GA ILLUSTRATIVE MATERIALS STUDY - EAST SECTION							ISSUED FOR PLANNING		A2.P2		A1		12/05/2023	
GYARD	F3	ZSMH	0	GA	A	82113	SMH: PROPOSED GA GROUND FLOOR PLAN							ISSUED FOR PLANNING		A2.P1		A1		18/02/2022	
GYARD	F3	ZSMH	1	GA	A	82114	SMH: PROPSED GA FIRST FLOOR PLAN							ISSUED FOR PLANNING		A2.P1		A1		18/02/2022	
GYARD	F3	ZSMH	2	GA	A	82115	SMH: PROPOSED GA ROOF PLAN							ISSUED FOR PLANNING		A2.P1		A1		18/02/2022	
GYARD	F3	ZSMH	0	GA	A	82116	SMH: EXISTING & DEMOLITION GA GROUND FLOOR PLAN							ISSUED FOR PLANNING		A2.P1		A1		18/02/2022	
GYARD	F3	ZSMH	1	GA	A	82117	SMH: EXISTING & DEMOLITION GA FIRST FLOOR PLAN							ISSUED FOR PLANNING		A2.P1		A1		18/02/2022	
GYARD	F3	ZSMH	ZZ	EL	A	82118	SMH: PROPOSED GA ELEVATIONS							ISSUED FOR PLANNING		A2.P1		A1		18/02/2022	
GYARD	F3	ZSMH	ZZ	SE	A	82119	SMH: PROPOSED SECTIONS							ISSUED FOR PLANNING		A2.P1		A1		18/02/2022	
GYARD	F3	ZZ	ZZ	RP	A	0001	DESIGN & ACCESS STATEMENT							ISSUED FOR PLANNING		A2.P1		A3		18/02/2022	
GYARD	F3	ZZ	ZZ	RP	A	0002	DAS ADDENDUM							ISSUED FOR PLANNING		A2.P1		A3		17/05/2023	
GYARD	F3	ZZ	ZZ	SH	A	0103	GY - Area Schedule							ISSUED FOR PLANNING		A2.P3		A3		12/05/2023	
GYARD	F3	ZZ	ZZ	SH	A	0107	GY - Accommodation Schedule							ISSUED FOR PLANNING		A2.P4		A4		12/05/2023	
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		RICHARD MAX																			
		CITY DESIGNER																			
		RPSGROUP																			
ISSUE FORMAT: E – ELECTRONIC / H#– HARDCOPY [incl. No.]																					

<div><div><div>F3</div><div>ARCHITECTS</div></div><div><div>Tel: +44 (0)20 7267 8332 +44 (0)7989 235 759</div><div>Add: F3 Architects, 5 Rochester Mews, London, NW1 9JB</div><div>Add: F3 Architects, 1 Paxton Place, London, N17 0FH</div></div></div>										220112 - HRW																																																											
THE DEPOT DRAWING REGISTER										DEPOT-F3-ZZ-ZZ-RG-A-0001										DATE: 12/05/2023																																																	
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DEPOT	F3	ZABC	B1+	GA	A	82101	BLOCK ABC PROPOSED GA B1-L00 FLOOR PLANS										ISSUED FOR PLANNING										A2.P5										A1										12/05/2023																						
DEPOT	F3	ZABC	01+	GA	A	82102	BLOCK ABC PROPOSED GA L01-L03 FLOOR PLANS										ISSUED FOR PLANNING										A2.P4										A1										12/05/2023																						
DEPOT	F3	ZABC	06+	GA	A	82103	BLOCK ABC PROPOSED GA L04-L07 FLOOR PLANS										ISSUED FOR PLANNING										A2.P4										A1										12/05/2023																						
DEPOT	F3	ZABC	08+	GA	A	82104	BLOCK ABC PROPOSED GA L08-L09 FLOOR PLANS										ISSUED FOR PLANNING										A2.P5										A1										12/05/2023																						
DEPOT	F3	ZABC	14+	GA	A	82105	BLOCK ABC PROPOSED GA L10 to L22 FLOOR PLANS										ISSUED FOR PLANNING										A2.P4										A1										12/05/2023																						
DEPOT	F3	ZABC	23+	GA	A	82106	BLOCK ABC PROPOSED GA L23-ROOF PLAN										ISSUED FOR PLANNING										A2.P4										A1										12/05/2023																						
DEPOT	F3	ZABC	ZZ	EL	A	82500	BLOCK ABC PROPOSED GA SOUTH & EAST ELEVATIONS										ISSUED FOR PLANNING										A2.P3										A1										12/05/2023																						
DEPOT	F3	ZABC	ZZ	EL	A	82501	BLOCK ABC PROPOSED GA NORTH & WEST ELEVATIONS										ISSUED FOR PLANNING										A2.P3										A1										12/05/2023																						
DEPOT	F3	ZD	ZZ	EL	A	82502	BLOCK D PROPOSED GA ELEVATIONS-SECTIONS										ISSUED FOR PLANNING										A2.P3										A1										12/05/2023																						
DEPOT	F3	ZE	ZZ	EL	A	82503	BLOCK E PROPOSED GA ELEVATIONS-SECTIONS										ISSUED FOR PLANNING										A2.P3										A1										12/05/2023																						
DEPOT	F3	ZG	ZZ	EL	A	82507	BLOCK G PROPOSED GA ELEVATIONS-SECTIONS										ISSUED FOR PLANNING										A2.P3										A1										12/05/2023																						
DEPOT	F3	ZABC	ZZ	EL	A	82508	BLOCK ABC PROPOSED GA MATERIALS ELEVATION STUDY										ISSUED FOR PLANNING										A2.P2										A1										12/05/2023																						
DEPOT	F3	ZABC	ZZ	SE	A	82600	BLOCK ABC PROPOSED GA SECTIONS										ISSUED FOR PLANNING										A2.P2										A1										12/05/2023																						
DEPOT	F3	ZZ	ZZ	SE	A	89000	SITE WIDE PROPOSED GA SECTIONS GG										ISSUED FOR PLANNING										A2.P2										A1										12/05/2023																						
DEPOT	F3	ZABC	ZZ	SE	A	86001	BLOCK ABC - NORTHERN BOUNDARY DETAIL SECTION										ISSUED FOR PLANNING										A2.P2										A1										12/05/2023																						
DEPOT	F3	Z3	0	GA	A	89005	SITE WIDE PROPOSED GA GROUND FLOOR PLAN ZONE 3										ISSUED FOR PLANNING										A2.P3										A1										12/05/2023																						
DEPOT	F3	Z4	0	GA	A	89006	SITE WIDE PROPOSED GA GROUND FLOOR PLAN ZONE 4										ISSUED FOR PLANNING										A2.P3										A1										12/05/2023																						
DEPOT	F3	Z3	0	GA	A	89007	SITE WIDE PROPOSED GA USE PLAN ZONE 3										ISSUED FOR PLANNING										A2.P3										A1										12/05/2023																						
DEPOT	F3	Z4	0	GA	A	89008	SITE WIDE PROPOSED GA USE PLAN ZONE 4										ISSUED FOR PLANNING										A2.P3										A1										12/05/2023																						
DEPOT	F3	ZD	00+	GA	A	82107	BLOCK D PROPOSED GA L00-L03 FLOOR PLANS										ISSUED FOR PLANNING										A2.P5										A1										12/05/2023																						
DEPOT	F3	ZD	04+	GA	A	82108	BLOCK D PROPOSED GA L04-ROOF PLAN										ISSUED FOR PLANNING										A2.P5										A1										12/05/2023																						
DEPOT	F3	ZE	00+	GA	A	82109	BLOCK E PROPOSED GA L00-ROOF PLAN										ISSUED FOR PLANNING										A2.P5										A1										12/05/2023																						
DEPOT	F3	ZG	00+	GA	A	82110	BLOCK G PROPOSED GA L00-L03 FLOOR PLANS										ISSUED FOR PLANNING										A2.P4										A1										12/05/2023																						
DEPOT	F3	ZG	04+	GA	A	82111	BLOCK G PROPOSED GA L04-ROOF FLOOR PLAN										ISSUED FOR PLANNING										A2.P3										A1										12/05/2023																						
DEPOT	F3	ZF	B1+	GA	A	82112	BLOCK F PROPOSED GA B1-L00 FLOOR PLANS										ISSUED FOR PLANNING										A2.P1										A1										18/02/2022																						
DEPOT	F3	ZF	01+	GA	A	82113	BLOCK F PROPOSED GA L01-L02 FLOOR PLANS										ISSUED FOR PLANNING										A2.P1										A1										18/02/2022																						
DEPOT	F3	ZF	RF	GA	A	82114	BLOCK F PROPOSED GA ROOF PLAN										ISSUED FOR PLANNING										A2.P1										A1										18/02/2022																						
DEPOT	F3	ZF	ZZ	EL	A	82504	BLOCK F PROPOSED GA EAST ELEVATIONS										ISSUED FOR PLANNING										A2.P1										A1										18/02/2022																						
DEPOT	F3	ZF	ZZ	EL	A	82505	BLOCK F PROPOSED GA NORTH SOUTH ELEVATIONS										ISSUED FOR PLANNING										A2.P1										A1										18/02/2022																						
DEPOT	F3	ZF	ZZ	EL	A	82506	BLOCK F PROPOSED GA WEST ELEVATIONS										ISSUED FOR PLANNING										A2.P1										A1										18/02/2022																						
DEPOT	F3	ZD	ZZ	EL	A	82509	BLOCK D PROPOSED GA MATERIALS ELEVATION STUDY										ISSUED FOR PLANNING										A2.P2										A1										12/05/2023																						
DEPOT	F3	ZE	ZZ	EL	A	82510	BLOCK E PROPOSED GA MATERIALS ELEVATION STUDY										ISSUED FOR PLANNING										A2.P2										A1										12/05/2023																						
DEPOT	F3	ZG	ZZ	EL	A	82511	BLOCK G PROPOSED GA MATERIALS ELEVATION STUDY										ISSUED FOR PLANNING										A2.P2										A1										12/05/2023																						
DEPOT	F3	ZD	ZZ	EL	A	82512	BLOCK D PROPOSED GA MATERIALS ELEVATION STUDY 02										ISSUED FOR PLANNING										A2.P2										A1										12/05/2023																						
DEPOT	F3	ZE	ZZ	EL	A	82513	BLOCK E PROPOSED GA MATERIALS ELEVATION STUDY 02										ISSUED FOR PLANNING										A2.P2										A1										12/05/2023																						
DEPOT	F3	ZG	ZZ	EL	A	82514	BLOCK G PROPOSED GA MATERIALS ELEVATION STUDY 02										ISSUED FOR PLANNING										A2.P2										A1										12/05/2023																						
DEPOT	F3	ZABC	ZZ	GA	A	82515	BLOCK ABC PROPOSED GA ELEVATION DETAIL - EAST ENTRANCE										ISSUED FOR PLANNING										A2.P2										A1										12/05/2023																						
DEPOT	F3	ZABC	ZZ	DR	A	82516	BLOCK ABC PROPOSED GA ELEVATION DETAIL - EAST ARTICULATION										ISSUED FOR PLANNING										A2.P2										A1										12/05/2023																						
DEPOT	F3	ZABC	ZZ	DR	A	82517	BLOCK ABC PROPOSED GA ELEVATION DETAIL - EAST SHOULDER										ISSUED FOR PLANNING										A2.P2										A1										12/05/2023																						
DEPOT	F3	ZABC	ZZ	DR	A	82518	BLOCK ABC PROPOSED GA ELEVATION DETAIL - SOUTH ENTRANCE										ISSUED FOR PLANNING										A2.P2										A1										12/05/2023																						
DEPOT	F3	ZABC	ZZ	DR	A	82519	BLOCK ABC PROPOSED GA ELEVATION DETAIL - NORTH SHOULDER										ISSUED FOR PLANNING										A2.P2										A1										12/05/2023																						
DEPOT	F3	ZABC	ZZ	DR	A	82520	BLOCK ABC PROPOSED GA ELEVATION DETAIL - WEST SHOULDER										ISSUED FOR PLANNING										A2.P2										A1										12/05/2023																						
DEPOT	F3	ZABC	ZZ	DR	A	82521	BLOCK ABC PROPOSED GA ELEVATION DETAIL - NORTH TOP DETAIL										ISSUED FOR PLANNING										A2.P2										A1										12/05/2023																						
DEPOT	F3	ZZ	EX	ST	A	89003	SITE DEMOLITION PLAN										ISSUED FOR PLANNING										A2.P1										A1										18/02/2022																						
DEPOT	F3	ZZ	ZZ	SH	A	0101	TD - Area Schedule										ISSUED FOR PLANNING										A2.P3										A3										12/05/2023																						
DEPOT	F3	ZZ	ZZ	SH	A	0108	TD - Accommodation Schedule										ISSUED FOR PLANNING										A2.P5										A4										12/05/2023																						
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DR	0862-RFM-HRW-XX-DR-L-0001	Illustrative Masterplan - Interim Phase	A1	P01	P02															
DR	0862-RFM-HRW-XX-DR-L-0002	Illustrative Masterplan - Complete Phase	A1	P01	P02															
DR	0862-RFM-GY-00-DR-L-0101	Level 00 Illustrative GA - Goods Yard	A0	P01	P02	P03														
DR	0862-RFM-GY-XX-DR-L-0102	Roof level Illustrative GA - Goods yard	A0	P01	P02	P03														
DR	0862-RFM-GY-00-DR-L-0103	Level 00 Planting Strategy - Goods Yard	A0	P01	P02															
DR	0862-RFM-GY-XX-DR-L-0104	Roof level Planting Strategy - Goods Yard	A0	P01	P02															
DR	0862-RFM-GY-XX-DR-L-0105	Illustrative Sections - Goods Yard	A0	P01	P02															
DR	0862-RFM-GY-XX-DR-L-0106	Illustrative Swatches - Goods Yard	A0	P01	P01															
DR	0862-RFM-TD-00-DR-L-0201	Level 00 Illustrative GA - The Depot	A0	P01	P01	P02														
DR	0862-RFM-TD-XX-DR-L-0202	Roof level Illustrative GA - The Depot	A0	P01	P01	P02														
DR	0862-RFM-TD-00-DR-L-0203	Level 00 Planting Strategy - The Depot	A0	P01	P01															
DR	0862-RFM-TD-XX-DR-L-0204	Roof level Planting Strategy - The Depot	A0	P01	P01															
DR	0862-RFM-TD-XX-DR-L-0205	Illustrative Sections - The Depot	A0	P01	P01															
DR	0862-RFM-TD-XX-DR-L-0206	Illustrative Swatches -The Depot	A0	P01	P01															
RP		Design and Access Statement - Landscape Chapter																		
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Richard Serra - Tottenham Hotspur			/	/																
James Benyon - Quod			/	/	/															
Hannah Cox - Quod			/	/																
Ian Laurance - F3 Architects			/	/	/															
Angel Larrondo - F3 Architects			/	/	/															
Mitchell Hall - F3 Architects			/	/	/															
Minerva Romay - F3 Architects			/	/	/															
Dan Bukin - F3 Architects			/	/	/															
Simon Binks - Arup			/	/																
Ignus Froneman - Cogent Heritage			/	/																
Jason Cox - Buro Happold			/	/																
Les Johnson - Buro Happold			/	/																

SCHEDULE OF PLANNING CONDITIONS

- 1) The development hereby permitted shall be begun before the expiration of three years from the date of this permission.
- 2) The proposed development shall be carried out in all respects in accordance with the proposals contained in the application and the approved plans set out in Appendix 10 to this decision.
- 3) (a) No Development, excluding site preparation works, shall commence on any Phase until a Phasing Plan has been submitted to and approved in writing by the Local Planning Authority.

(b) The Phasing plan shall set out a breakdown of the following for each identified Phase:
 - (i) Number of dwellings (including dwelling mix and tenure)
 - (ii) Children's play space
 - (iii) Car parking spaces
 - (iv) Cycle parking spaces
 - (v) Details of interim boundary treatments
(c) The development shall be carried out in accordance with the approved Phasing Plan and the approved interim boundary treatments shall be maintained in good condition until such times as they are replaced by permanent boundary treatments approved under Condition 13.
- 4) (a) The non-residential floorspace hereby approved shall include at least 400sqm of Business floorspace (Use Class E (g) (i) (ii) or (iii)).

(b) Notwithstanding the provisions of the Town and Country Planning (Use Classes) Order 1987 (as revised), or any Order or Regulations that revoke or further revises this Order, the 400sqm of Business floorspace that is provided under (a) above shall only be used for offices, research and development and industrial processes in perpetuity.
- 5) The detailed design for each dwelling in Goods Yard Blocks A, B, C, D, E, F and G and Depot Blocks A, B, C, D, E, F and G hereby approved shall meet the required standard of the Approved Document M of the Building Regulations (2015). The following dwellings shall meet Approved Document M, M4(3) (2b) ('wheelchair user dwellings'):
 - GY BLOCK A: GY-L01-A-01-AC, GY-L02-A-01-AC, GY-L02-A-04-AC, GY-L02-A-05-AC, GY-L03-A-01-AC, GY-L03-A-04-AC, GY-L03-A-05-AC, GY-L04-A-06-AC, GY-L05-A-06-AC, GY-L06-A-06-AC, GY-L29-A-03-AC, GY-L30-A-03-AC,

GY-L31-A-03-AC.

- GY BLOCK B: GY-L00-B-01-AC, GY-L00-B-04-AC, GY-L01-B-03-AC, GY-L01-B-05-AC, GY-L02-B-04-AC, GY-L03-B-04-AC, GY-L04-B-04-AC, GY-L05-B-04-AC, GY-L06-B-04-AC, GY-L07-B-04-AC, GY-L08-B-04-AC, GY-L09-B-04-AC, GY-L10-B-04-AC, GY-L11-B-04-AC, GY-L12-B-04-AC, GY-L13-B-04-AC, GY-L14-B-04-AC, GY-L15-B-04-AC, GY-L16-B-04-AC, GY-L17-B-04-AC, GY-L18-B-04-AC, GY-L19-B-04-AC, GY-L20-B-04-AC, GY-L21-B-04-AC, GY-L24-B-04-AC, GY-L25-B-04-AC, GY-L26-B-04-AC.
- GY BLOCK C: GY-L01-C-02-AC, GY-L01-C-03-AC, GY-L01-C-04-AC.
- GY BLOCK D: GY-L05-D-01.
- GY BLOCK F: GY-L00-F-01-AC, GY-L00-F-02-AC, GY-L00-F-03-AC, GY-L02-F-04-AC.
- GY BLOCK G: GY-L01-G-01-AC, GY-L03-G-01-AC.
- THE DEPOT BLOCKS A/B/C: TD-L00-A-01-AC, TD-L01-A-02-AC, TD-L26-A-03-AC, TD-L27-A-03-AC, TD-L28-A-03-AC, TD-L01-B-02-AC, TD-L02-B-01-AC, TD-L02-B-03-AC, TD-L02-B-06-AC, TD-L03-B-01-AC, TD-L03-B-03-AC, TD-L03-B-06-AC, TD-L04-B-01-AC, TD-L04-B-03-AC, TD-L04-B-06-AC, TD-L05-B-01-AC, TD-L05-B-03-AC, TD-L05-B-06-AC, TD-L06-B-01-AC, TD-L06-B-03-AC, TD-L06-B-06-AC, TD-L07-B-01-AC, TD-L07-B-03-AC, TD-L07-B-06-AC, TD-L08-B-01-AC, TD-L08-B-04-AC, TD-L08-B-05-AC.
- THE DEPOT BLOCK D: TD-L00-D-01-AC, TD-L00-D-02-AC, TD-L02-D-03-AC, TD-L02-D-04-AC.
- THE DEPOT BLOCK E: TD-L00-E-01-AC, TD-L00-E-04-AC.
- THE DEPOT BLOCK G: TD-L03-G-03-AC, TD-L04-G-04-AC, TD-L05-G-02-AC.

All other dwellings shall meet Approved Document M M4(2) ('Accessible and adaptable dwellings').

- 6) (a) No ground floor commercial unit shall be occupied as a café/restaurant (Use Class E(b)) until such times as full details of ventilation and extraction of fumes have been submitted to and approved in writing by the Local Planning Authority.

(b) The approved ventilation and fume extraction measures shall be completed and made operational prior to the first occupation of the unit as a café/restaurant (Use Class E(b)), in accordance with the approved details and shall be permanently maintained thereafter.

- 7) Any café/restaurant use (Use Class E(b)) shall only be open to the public between the hours of 07.00 to 23.00 (Monday to Saturday) and 08.00 to 23.00 (Sundays and Public Holidays).

- 8) (a) Prior to commencement of any non-residential use with each relevant Phase (as identified in an approved Phasing Plan), a design stage accreditation certificate for that phase must be submitted to the Local Planning Authority
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confirming that the development will achieve a BREEAM “Very Good” outcome (or equivalent) for each non-residential use within that phase.

(b) The relevant Phase shall then be constructed in strict accordance with the approved details, shall achieve the agreed rating and shall be maintained as such thereafter for the lifetime of the development.

(c) Prior to occupation of any non-residential use within each relevant Phase, a post-construction certificate issued by the Building Research Establishment (or equivalent) for each non-residential use in that phase must be submitted to and approved in writing by the Local Planning Authority, confirming this standard has been achieved.

(d) In the event that any non-residential use fails to achieve the agreed rating, a full schedule and costings of remedial works required to achieve this rating shall be submitted to and approved in writing by the Local Planning Authority within 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 Local Planning Authority for off-site remedial actions.

- 9) (a) No development of Goods Yard Blocks E, F, G and H and Depot Blocks B and G at slab level or above shall commence until such times as full details of the floor slab and any other noise attenuation measures between the ground floor commercial unit and dwellings on the first floor have been submitted to and approved in writing by the Local Planning Authority.

(b) The details shall be designed to ensure that at any junction between dwellings and the ground floor commercial unit, the internal noise insulation level for the dwellings is no less than 60 dB DnT,w + Ctr.

(c) The approved floor slab and any other noise attenuation measures shall be completed in accordance with the approved details, prior to the occupation of any of the first floor dwellings directly above the commercial unit and shall be maintained thereafter.

- 10) (a) The dwellings hereby approved in Good Yard Blocks A, B, C, D, E, F and G and Depot Blocks A, B, C, D, E, F and G shall not be occupied until such times as full details of the glazing specification and ventilation for habitable rooms in all façades of the dwellings to which they relate have been submitted to and approved in writing by the Local Planning Authority.

(b) The above details shall be designed in accordance with BS8233:2014 ‘Guidance on sound insulation and noise reduction for buildings’ and meet the following noise levels;

Time	Area	Average Noise level
Daytime Noise 7am –	Living rooms &	35dB(A)

11pm	Bedrooms	(LAeq,16hour)
	Dining Room Area	40dB(A) (LAeq,16hour)
Night Time Noise 11pm - 7am	Bedrooms	30dB(A) (LAeq,8hour)

With individual noise events not to exceed 45 dB LAmax (measured with F time weighting) more than 10-15 times in bedrooms between 23:00hrs – 07:00hrs.

(c) The approved glazing specification and ventilation measures for the habitable rooms in all facades of the dwellings shall be installed and made operational prior to the occupation of any of the dwellings to which they relate in the Block as specified in part (a) of this condition and shall be maintained thereafter.

- 11) (a) The ground floor commercial unit in Depot Block G shall not be occupied as a Café/Restaurant (Use Class E(b)) until such times as landscaping details for the associated space immediately to the west of the unit (in the Detailed Element) that include wind mitigation measures that are designed to ensure the Lawson Criteria Comfort Rating for 'Long-term Sitting' (C4) have been submitted to and approved in writing by the Local Planning Authority.

(b) The approved wind mitigation measures shall be implemented prior to the first occupation of the unit as a Café/Restaurant (Use Class E(b)) and shall be permanently maintained thereafter when the unit is in use.

- 12) The Development must be carried out in accordance with the provisions of the Fire Statement (HRW-BHE-GD-XX-RP-YD-0001, Revision 00) prepared by Buro Happold, dated 12 May 2023.

- 13) (a) The following external landscaping details of external areas and amenity areas for each relevant Phase (as identified in an approved Phasing Plan) shall be submitted to and approved in writing by the Local Planning Authority before any Block in the Phase in which it is located commences above ground floor slab level:

- i) Hard surfacing materials;
- ii) Drinking water fountain/dispenser providing drinking water that is free to users in Peacock Park;
- iii) Children's play areas and equipment;
- iv) Boundary treatments;
- v) Any relevant SuDs features (as identified in the Drainage Strategy (HRW-BHE-GD-XX-RP-CI-0001, Revision 00), dated 18 February 2022);

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- vi) A SUDS management and maintenance plan for the proposed SUDS features, detailing future management and maintenance responsibilities for the lifetime of the development;
 - vii) Minor artefacts/structures (e.g. furniture, refuse or other storage units and signs);
 - viii) Proposed and existing functional services above and below ground (e.g. drainage power, communications cables, pipelines, indicating lines, manholes and supports);
 - ix) Planting plans and a full schedule of species of new trees and shrubs proposed to be planted noting species, plant sizes and proposed numbers/densities where appropriate;
 - x) Any food growing areas and soil specification;
 - xi) Written specifications, including cultivation and other operations associated with plant and grass establishment; and
 - xii) Implementation programme.

(b) The external landscaping and SUDS features shall be carried out in accordance with the approved details, management and maintenance plan and implementation programme.

- 14) Any trees or plants which within 5 years from them being planted die, are removed, or become seriously damaged or diseased shall be replaced in the next planting season with the same size and species or an approved alternative as agreed in writing by the Local Planning Authority.

- 15) (a) Within 30 days of the demolition of any existing buildings on The Depot part of the site, written details of temporary landscaping and/or the temporary use of the land left vacant by the demolition shall be submitted to and approved in writing by the Local Planning Authority.

(b) The implementation of approved temporary landscaping and/or temporary use of the land shall be implemented within 90 days of the written approval of details (as required by part (a) above) and shall be maintained thereafter in accordance with the approved details.

- 16) (a) No development shall commence of the Depot Blocks E, F or G until adequate steps have been taken in accordance with 'Section 8 of BS 5837 Trees' to safeguard all trees to be retained (Trees 3001, 3002, 3003 and 3004 as identified on Drawing 37-1030.02A) in the submitted Tree Survey (CC37-1030, dated February 2022) against damage prior to or during building works, including the erection of fencing.

(b) Protective fences shall be erected to the extent of the crown spread of the trees, or where circumstances prevent this, to a minimum radius of 2m from the trunk of the tree and such protection shall be retained until works of demolition

and construction have been completed.

(c) No excavation site works, trenches or channels shall be cut, or pipes or services laid in such a way as to cause damage to the root structure of trees to be retained (as identified in (a) above).

17) a) Prior to occupation of the first Block in a Phase (as identified in an approved Phasing Plan) details of ecological enhancement measures for that Phase shall be submitted to and approved in writing by the Local Planning Authority. This shall be consistent with the recommendations of the Ecological Appraisal Report Update, dated 19 May 2023 and detail the biodiversity net gain, plans showing the proposed location of ecological enhancement measures (including bat boxes, bird boxes and bee bricks), a sensitive lighting scheme, justification for the location and type of enhancement measures by a qualified ecologist, and how the development will support and protect local wildlife and natural habitats.

(b) Prior to the occupation of the last Block in a Phase (as identified in an approved Phasing Plan), photographic evidence and a post- development ecological field survey and impact assessment of that phase shall be submitted to and approved in writing by the Local Planning Authority to demonstrate the delivery of the ecological enhancement and protection measures is in accordance with the approved measures and in accordance with CIEEM standards.

(c) Development shall accord with the details as approved and retained for the lifetime of the development.

18) (a) No development of any Block in a Phase (as identified in an approved Phasing Plan) shall commence above ground floor slab level until all proposed external materials and elevational details for that Block have been submitted to and approved in writing by the Local Planning Authority. These external materials and details shall include:

i). External facing materials and glazing, including sample boards of all cladding materials and finishes;

ii) Sectional drawings at 1:20 through all typical external elements/facades, including all openings in external walls including doors and window-type reveals, window heads and window cills;

iii) Sectional and elevational drawings at 1:20 of junctions between different external materials, balconies, parapets to roofs, roof terraces and roofs of cores;

iv) Plans of ground floor entrance cores and entrance-door thresholds at 1:20 and elevations of entrance doors at 1:20;

(b) The development shall be carried out in accordance with the approved details and materials.

19) (a) Prior to the commencement of a Block above ground floor slab level in a Phase (as identified in an approved Phasing Plan), details of any living roofs for

Blocks in that phase shall be submitted to and approved in writing by the Local Planning Authority. Living roofs shall be planted with flowering species that provide amenity and biodiversity value at different times of year. Plants shall be grown and sourced from the UK and all soils and compost used must be peat-free. The submission shall include:

- i. A roof plan identifying where the living roofs will be located;
- ii. A ground floor plan identifying where the living walls will be rooted in the ground, if any;
- iii. Sections demonstrating installed and expected settled substrate levels of no less than 120mm for extensive living roofs, and no less than 250mm for intensive living roofs;
- iv. Roof plans annotating details of the diversity of substrate depths and substrate types across the roof to provide contours of substrate, including annotation of substrate mounds and sandy piles in areas with the greatest structural support to provide a variation in habitat, with a minimum of one feature per 10m² of living roof;
- v. Roof plans annotating details of the location of semi-buried log piles / flat stones for invertebrates, with a minimum footprint of 1m² and at least one feature per 10m² of living roof;
- vi. Details on the range of native species of (wild) flowers, herbs in the form of seeds and plug plants planted on the living roofs, or climbing plants planted against walls, to benefit native wildlife;
- vii. Roof plans and sections showing the relationship between the living roof areas and photovoltaic array; and
- viii. Management and maintenance plan, including frequency of watering arrangements.

(b) Prior to the occupation of 90% of the dwellings, evidence must be submitted to and approved by the Local Planning Authority that the living roof has been delivered in line with the details set out in point

(a). This evidence shall include photographs demonstrating the measured depth of soil/substrate planting and biodiversity measures. If the Local Planning Authority finds that the living roof has not been delivered to the approved standards, the applicant shall rectify this to ensure it complies with the condition. The living roof(s) and/or walls shall be retained thereafter for the lifetime of the development in accordance with the approved management arrangements.

- 20) (a) No development shall commence above ground floor slab level of Depot Block D until details of either a stand-alone boundary fence and/or details of the treatment of the rear ground floor boundary elevation of the ground floor parking area have been submitted to and approved in writing by the Local Planning Authority.

(b) The approved boundary fence and/or building elevation shall be provided in accordance with the approved details, before any dwelling in Depot Block D is first occupied and shall be maintained thereafter.

21)Energy Strategy

(a) Prior to the commencement of works above ground floor slab level for a Block in a Phase (as identified in an approved Phasing Plan), an updated Energy Strategy for that phase must be submitted with complete Design Stage SAP worksheets based on the Sustainability and Energy Statement and Addendum (HRW-BHE-GD-XX-RP-YS-0001, Revision 00, dated 18 February 2022 and 19 May 2023). The development shall achieve minimum carbon emissions savings of 78% (residential) and 42% (non-residential) over 2021 Building Regulations Part L, with a minimum solar PV array of 168 kWp on the Goods Yard part of the site and minimum 45 kWp on the Depot part of the site. The updated Strategy shall include:

- i. Explanation as to how the Development phase achieves minimum carbon reductions at the Be Lean Stage of 10% for the domestic new build and 15% for the non-domestic new build elements
- ii. An air tightness delivery strategy;
- iii. Detailed thermal bridging calculations demonstrating how thermal bridging shall be reduced;

(b) Within six months of first occupation of any dwellings, evidence shall be submitted in writing to the Local Planning Authority that the development has been registered on the GLA's Be Seen energy monitoring platform.

(c) The final agreed Energy Strategy shall be operational prior to the first occupation of the development. The development shall be carried out strictly in accordance with the approved details and shall be operated and maintained as such thereafter.

22)Overheating (Non-Residential)

(a) Prior to the occupation of any non-residential floorspace in a relevant Phase (as identified in an approved Phasing Plan), an Overheating Report for that phase must be submitted to and approved in writing by the Local Planning Authority only if that space is to be occupied in accordance with the NCM Activity Database or will accommodate any vulnerable users, such as office/workspace, community, healthcare, or educational uses.

(b) The report shall be based on the current and future weather files for 2020s, 2050s and 2080s for the CIBSE TM49 central London dataset. It shall set out:

- i. The proposed occupancy profiles and heat gains in line with CIBSE TM52.
- ii. The modelled mitigation measures which will be delivered in line with the Cooling Hierarchy to ensure the development complies with DSY1 for the 2020s weather file.
- iii. A retrofit plan that demonstrates which mitigation measures would be required to pass future weather files, with confirmation that the retrofit measures can be integrated within the design.
- iv. The mitigation measures hereby approved shall be implemented prior to occupation and retained thereafter for the lifetime of the development.

23)Overheating (Residential)

(a) Prior to the above ground commencement of a Block in a Phase (as identified in an approved Phasing Plan), an updated Overheating Report shall be submitted to and approved by the Local Planning Authority. The submission shall assess the overheating

risk, propose a retrofit plan, and re-consider the feasibility of installing external (movable) shading devices to the east, south and west facades. This assessment shall be based on the methodology following CIBSE TM59 with the London Weather Centre files as set out in the Sustainability and Energy Statement prepared by Buro Happold (HRW-BHE-GD-XX-RP-YS-0001, Revision 00, dated 18 February 2022 and 19 May 2023).

- (b) Prior to occupation of a Block in a Phase (as identified in an approved Phasing Plan), the approved dwellings in that Block shall be built in accordance with the approved overheating measures and retained thereafter for the lifetime of the development. This shall include:
- i. Natural ventilation, with 100% (bedroom) and 30% (LKD) of openable area at night;
 - ii. Acoustic louvres for noise attenuated ventilation (30% free area);
 - iii. Ceiling fans;
 - iv. Glazing g-values of 0.35 and 0.30;
 - v. Vertical side fins;
 - vi. MVHR with summer bypass; ~~and~~
 - vii. No active cooling; and
 - viii. Any further mitigation measures as approved by or superseded by the latest approved Overheating Strategy.
- 24) (a) Prior to the occupation of any Block in a Phase (as identified in an approved Phasing Plan), a Post Completion Report for that phase setting out the predicted and actual performance against all numerical targets in the Detailed Circular Economy Statement (HRW-BHE-GY-XX- RP-YZ-GY-0001, Revision 01), dated 18 February 2022 shall be submitted to the GLA at: circulareconomystatements@london.gov.uk and the Local Planning Authority, 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.
- (b) The Post Completion Report shall be approved in writing by, the Local Planning Authority, prior to occupation of the Block to which it relates.
- 25) (a) Prior to the occupation of a Block in a Phase (as identified in an approved Phasing Plan), the post-construction tab of the GLA's whole life carbon assessment template for that phase shall be completed accurately and in its entirety in line with the GLA's Whole Life Carbon Assessment Guidance.
- (b) The post-construction assessment required in part (a) shall provide an update of the information included in the Whole Life-Cycle Carbon Assessment included in the Sustainability and Energy Statement (HRW-BHE-GD-XX-RP-YS-0001, Revision 00, dated 18 February 2022 and 19 May 2023)), including the whole life carbon emission figures for all life- cycle modules based on the actual materials, products and systems used. This shall be submitted to the GLA at:

ZeroCarbonPlanning@london.gov.uk and the Local Planning Authority, along with any supporting evidence as per the guidance.

(c) The post construction assessment shall be approved in writing by the Local Planning Authority, prior to the occupation of the phase to which it relates.

- 26) (a) Upon final completion of the last Block in a relevant Phase (as identified in an approved Phasing Plan), suitable devices for the monitoring of the energy use and renewable/low-carbon energy generation (by residential unit) shall have been installed in each Block in that Phase, and the monitored data for each Block in that phase shall be submitted to the Local Planning Authority at daily intervals for a period of five years from final completion.
- (b) The installation of the monitoring devices and the submission of the data shall be carried out in accordance with the principles of the London Plan Guidance 'Be Seen' energy monitoring guidance.
- 27) Installed PV Arrays shall be maintained in good working order or replaced as necessary and cleaned at least annually for the lifetime of the scheme.
- 28) (a) The Public Realm/Children's Play Space immediately to the east of Depot Block E (as identified on Proposed GA Ground Floor Plan, reference 'DEPOT-F3-Z4-00-GA-A- 89006, Rev A2.P3) shall only be used as an extension to the Brook House School playground until such times as a Management & Maintenance Plan that allows for non- school related uses has been submitted to and approved in writing by the Local Planning Authority. The Plan shall set out details of the following:
- i) Days and times when the space is to be open for use by residents of the approved development for non-school related specified activities.
 - ii) Measures to discourage and manage anti-social behaviour
 - iii) Management and maintenance responsibilities to ensure that there is no impediment to use of the space for the approved non-school related specific activities
- (b) The Management & Maintenance Plan may be revised from time to time with the written approval of the Local Planning Authority and all those responsible for managing and maintaining the space.
- (c) The Space shall be used, managed and maintained for non-school related activities only in accordance with the approved Management & Maintenance Plan.
- 29) (a) Prior to the first occupation of each Block in a Phase (as identified in an approved Phasing Plan), a 'Secured by Design' accreditation shall be obtained for that phase and thereafter all features are to be permanently retained.

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- (b) Accreditation must be achieved according to current and relevant Secured by Design guidelines at the time of above ground works of each Phase of the development.
- 30) No development (save for demolition to ground level) shall commence in each relevant phase until a Stage 1 Written Scheme of Investigation (WSI) has been submitted to and approved by the Local Planning Authority in writing for each relevant phase. For land that is included within the WSI, no development shall take place other than in accordance with the agreed WSI, and the programme and methodology of site evaluation and the nomination of a competent person(s) or organisation to undertake the agreed works.
- 31) If heritage assets of archaeological interest are identified by a Stage 1 Written Scheme of Investigation (WSI) of Archaeology, then for those parts of the site which have archaeological interest, a Stage 2 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 development shall take place other than in accordance with the agreed stage 2 WSI which shall include:
- i) 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.
 - ii) 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.
- 32) (a) In the event that the Stage I and/or Stage II Written Scheme of Investigation of Archaeology identifies any archaeological remains that require protection, details of the foundation design and construction method to protect any archaeological remains in that phase have been submitted to and approved in writing by the Local Planning Authority.
- (b) The development shall be carried out in accordance with the approved details.
- 33) (a) No development for each relevant phase shall commence until impact studies of the existing water supply infrastructure for that phase have been submitted to and approved in writing by the Local Planning Authority, in consultation with Thames Water. The studies shall determine the magnitude of any new additional capacity required in the system and a suitable connection point. Should additional capacity be required, the impact study should include ways in which this capacity will be accommodated.
- (b) The development within each phase, as approved under Condition 3 above, shall then be implemented in accordance with the recommendations of the approved impact study and retained in perpetuity thereafter.
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- 34) No development shall commence in each relevant phase other than investigative work until:
- i) Taking account of information in the Land Contamination Assessment Update (Phase I) with reference HRW-BHE-GD-XX-RP-CG-002 Revision P00 prepared by Buro Happold Ltd dated 18 May 2023, a site investigation for that phase has been conducted for the site using information obtained from the desktop study and Conceptual Model. The investigation must be comprehensive enough to enable: a risk assessment to be undertaken, refinement of the Conceptual Model, and the development of a Method Statement detailing the remediation requirements.
 - ii) The risk assessment and refined Conceptual Model shall be submitted, along with the site investigation report for that phase, to the Local Planning Authority.
 - iii) If the risk assessment and refined Conceptual Model indicate any risk of harm, a Method Statement detailing the remediation requirements, using the information obtained from the site investigation, and also detailing any post remedial monitoring shall be submitted to, and approved in writing by, the Local Planning Authority prior to that remediation being carried out on site.
- 35) Where remediation of contamination within each relevant Phase (as identified in an approved Phasing Plan) on the site is required pursuant to the condition above, completion of the remediation detailed in the method statement for each phase shall be carried out and a report that provides verification that the required works have been carried out, shall be submitted to, and approved in writing by the Local Planning Authority before the development is first occupied.
- 36) (a) If, during development, contamination not previously identified is found to be present at the site then no further development 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.
- (b) The remediation strategy shall be implemented as approved.
- 37) (a) The basement car parking areas hereby approved shall not be brought in to use until such times as Basement Access Control Arrangements have been submitted to and approved in writing by the Local Planning Authority.
- (b) The Basement Vehicular Access Control Arrangements shall include written and illustrated details of signal control and give-way systems to manage vehicular movements in and out of the approved basement car parks and demonstrate their adequacy to manage any vehicle queues.
- (c) The car parking areas shall be operated only in accordance with the relevant approved Basement Vehicular Access Control Arrangements.

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- 38) (a) No development on the Goods Yard part of the site shall commence until a combined Stage 1 and Stage 2 Road Safety Audit for the proposed vehicular access junction and associated pedestrian footways on White Hart Lane has been submitted to and approved in writing by the Local Planning Authority.
- (b) The detailed design of the junction hereby approved shall be in accordance with the recommendations in an approved Audit and maintained thereafter and implemented before the first occupation of the development.
- 39) (a) No development on the Goods Yard part of the site shall commence until a combined Stage 1 and Stage 2 Road Safety Audit for the proposed vehicular route and associated pedestrian footways referred to as 'Embankment Lane' between Central Court (south of Goods Yard Block C) and Northern Square (northern edge of Goods Yard Zone 1) as shown on Drawing GYARD-F3-Z1-0-GA-A-82102-A2.P3) has been submitted to and approved in writing by the Local Planning Authority.
- (b) The detailed design of the junction hereby approved shall be in accordance with the recommendations in an approved Audit and maintained thereafter and implemented before the first occupation of the development.
- 40) (a) No development in the relevant Phase shall be occupied until a Car Parking Design and Management Plan (CPMP) for that Phase has been submitted to and approved in writing by the Local Planning Authority.
- (b) The CPMP shall include details of the following:
- i. Location and design of any temporary car parking spaces.
 - ii. Location and design of car parking spaces.
 - iii. Provision of Electric Vehicle Charging Points (direct provision for 20% of spaces, with passive provision for the remaining 80%).
 - iv. Allocation, management and enforcement of residential car parking spaces (prioritising disabled people, then families with children then others).
 - v. Allocation, management and enforcement of commercial car parking spaces (provision only as needed by individual businesses).
 - vi. Provision, management and enforcement of disabled car parking spaces to allow for the required number of such spaces (up to 87 overall).
 - vii. Details of the proposed signal control and give-way systems used to manage vehicular movements in and out of the basement car parks via the proposed ramps.
- (c) Car parking shall be allocated, managed and enforced in accordance with the approved CPMP.
- (d) All car parking spaces shall be leased and not sold outright.
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- 41) (a) No development shall commence in the relevant Phase until details of cycle parking and provision for changing/locker space for commercial units in that Phase have been submitted to and approved in writing by the Local Planning Authority.
- (b) The cycle parking details shall demonstrate compliance with the relevant standards in Policy T5 of the London Plan (2021) and the London Cycling Design Standards.
- (c) The cycle parking provision shall be implemented in accordance with the approved details before the occupation of each phase and retained thereafter for this use only.
- 42) (a) No development in the relevant Phase shall be occupied until a Delivery and Servicing Plan (DSP) for that Phase has been submitted to and approved in writing by the Local Planning Authority. The DSP for that Phase shall be in broad conformity with the approved Delivery and Servicing Plan (within the Transport Assessment prepared by Arup, 278880-ARP-XX-XX-RP-T-000007, 18 February 2022 and Transport for London's Delivery and Servicing Plan Guidance (2020), other than details of the location and dimensions of the all proposed loading bays which shall be submitted to and approved in writing by the Local Planning Authority.
- (b) The DSP, including loading bays approved under (a) above shall be implemented and updated following the results of the first delivery and servicing survey to be undertaken within 12 months of first occupation of the relevant Phase of the proposed development.
- (c) The process identified in (b) above shall be repeated until all Phases of the proposed development have been delivered and occupied, at which point every Phase DSP shall be consolidated into one overarching full DSP and retained thereafter.
- (d) Further surveys and updates of the full DSP shall be submitted to and approved in writing by the Local Planning Authority.
- 43) (a) No development shall commence in a Phase (as identified in an approved Phasing Plan) until a Detailed Construction Logistics Plan (CLP) for that Phase has been submitted to and approved in writing by the Local Planning Authority.
- (b) The Detailed CLP for each Phase shall conform with the approved Outline Construction Logistics Plan within the submitted Transport Assessment (278880- ARP-XX-XX-RP-T-000007, dated 18 February 2022) and Transport for London's Construction Logistics Planning Guidance (2021) and shall include the following details:
- i. Site access and car parking arrangements;
 - ii. Delivery booking systems;
 - iii. Construction phasing and agreed routes to/from the development replace lorry routeing;
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- iv. Timing of deliveries to and removals from the site (to avoid peak times of 07.00 to 9.00 and 16.00 to 18.00 where possible);
 - v. Travel plans for staff/ personnel involved in construction;
 - vi. Crane Lifting Management Plan (CLMP); and
 - vii. Crane Erection and Dismantling.
- (c) Development shall be undertaken in accordance with the approved details.
- 44) (a) No development shall commence until an existing condition survey of the western half of the High Road carriageway and footway (between the railway bridge and the western pedestrian access to The Grange) and the northern half of White Hart Lane carriageway and footway (between the southern and northern site boundaries) has been undertaken in collaboration with the Council's Highways Maintenance team and submitted to and approved in writing by the Local Planning Authority.
- (b) Within one month of the completion of all development works, including any highway works, a final condition survey shall be undertaken of the highway areas identified in (a) in collaboration with the Council's Highways Maintenance team and submitted to and approved in writing by the Local Planning Authority.
- (c) The applicant shall ensure that any damages caused by the construction works and highlighted by the before-and-after surveys are addressed and the condition of the public highway is reinstated to the satisfaction of the Council's Highways Maintenance team in accordance with an associated Highway Agreement.
- 45) (a) No development in a relevant Phase (as identified in an approved Phasing Plan) that adjoins the western boundary of the site shall commence until an Infrastructure Protection Plan (IPP) for that Phase relating to London Overground has been submitted to and approved in writing by the Local Planning Authority.
- (b) Any protection measures approved in an IPP shall be implemented in accordance with approved details.
- 46) (a) No demolition in each relevant Phase (as identified in an approved Phasing Plan) shall commence until a Demolition Environmental Management Plan (DEMP) for that Phase has been submitted to and approved in writing by the Local Planning Authority.
- (b) No development in each relevant phase shall commence (other than demolition) until a Construction Environmental Management Plan (CEMP) has been submitted to and approved in writing by the Local Planning Authority.
- (c) The DEMP and CEMP shall provide details of how demolition and construction works respectively are to be undertaken and shall include:
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- i. A construction method statement which identifies the stages and details how works will be undertaken;
 - ii. Details of working hours, which shall be limited to 08.00 to 18.00 Monday to Friday and 08.00 to 13.00 on Saturdays. There shall be no working on Sundays or bank holidays;
 - 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;
 - x. Details of any other standard environmental management and control measures to be implemented.
 - xi. Evidence of site registration at nrmm.london to allow continuing details of Non-Road Mobile Machinery (NRMM) and plant of net power between 37kW and 560kW to be uploaded.

(d) the CEMP shall also include consideration as to whether any ecological protection measures are required for each relevant Phase (as identified in an approved Phasing Plan), to include an assessment of vegetation for removal, including mature trees, for the presence of nesting birds. Mitigation measures including the use of sensitive timings of works, avoiding the breeding bird season (March-August, inclusive) and, where not possible, pre-works checks by a suitably experienced ecologist will be provided in detail.

(e) All plant and machinery to be used during the demolition and construction phases of the development shall meet Stage IIIA of the EU Directive 97/68/EC for both NO_x and PM emissions.

(f) Demolition and construction works shall only be carried out in a particular Phase in accordance with an approved DEMP and CEMP for that Phase.

- 47) (a) No development in each relevant Phase (as identified in an approved Phasing Plan) shall commence, save for investigative work, until a detailed Air Quality and Dust Management Plan (AQDMP), detailing the management of demolition and construction dust, has been submitted to and approved in writing by the Local Planning Authority. The AQDMP shall be in accordance with the Greater London Authority SPG Dust and Emissions Control (2014) and shall include:

- i) Monitoring locations;

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- ii) Mitigation measures to manage and minimise demolition/ construction dust emissions during works; and
 - iii) a Dust Risk Assessment.

(b) Demolition and construction works shall only be carried out in a particular Phase in accordance with an approved AQDMP for that Phase.

- 48) (a) No piling shall take place in each relevant Phase (as identified in an approved Phasing Plan) until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) for that Phase has been submitted to and approved in writing by the Local Planning Authority in consultation with Thames Water.

(b) Any piling in each relevant Phase must be undertaken in accordance with the terms of the approved piling method statement for that Phase.

- 49) For the duration of the demolition and construction works the developer and its contractors shall establish and maintain a Liaison Group having the purpose of:

- i. informing local residents and businesses of the design and development proposals;
- ii. informing local residents and businesses of progress of preconstruction and construction activities;
- iii. considering methods of working such as hours and site traffic;
- iv. providing local residents and businesses with an initial contact for information relating to the development and for comments or complaints regarding the development with the view of resolving any concerns that might arise;
- v. providing advanced notice of exceptional works or deliveries; and
- vi. providing telephone contacts for resident's advice and concerns.

The terms of reference for the Liaison Group, including frequency of meetings, shall be submitted to and approved in writing by the Local Planning Authority prior to commencement of the development. For the avoidance of doubt, this could comprise the Applicant's existing 'Business and Community Liaison Group' (BCLG) or an alternative agreed with the Council.

- 50) The placement of any telecommunications apparatus, satellite dish or television antenna on any external surface of the development is precluded, with exception provided for a communal satellite dish or television antenna for the residential units details of which are to be submitted to the Local Planning Authority for its written approval prior to the first occupation of the development hereby approved. The provision shall be retained as installed thereafter.
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- 51) (a) No development of any or all of Depot Block A, Goods Yard Block A & Goods Yard Block B shall commence above ground floor slab level until (notwithstanding what is indicated on the approved drawings), details of the colour of the external façade including the tops of the towers have been submitted to and approved by the Local Planning Authority
- (b) Thereafter the development shall be carried out in accordance with the approved details and materials.
- 52) (a) No development of any Block in the land known as “The Depot” shall commence above ground floor slab level until the boundary treatments of the Brook House Yard (shown on page 180 of the Design and Access Statement, February 2022) have been submitted to and approved by the Local Planning Authority.
- (b) Thereafter the development shall be carried out in accordance with the approved details and materials
- 53) Prior to the above ground commencement of construction work, details relating to the future connection to the DEN must be submitted to and approved by the local planning authority. This shall include:
- Further detail of how the developer will ensure the performance of the DEN 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.);
 - A strategy for the supply of heat to any phases occupied before a connection is made to an off-site District Energy Network;
 - A strategy that ensures heat can be supplied to the other sites within the High Road West masterplan area via this development site;
 - Peak heat load calculations in accordance with CIBSE CP1 Heat Networks: Code of Practice for the UK (2020) taking account of diversification.
 - Detail of the pipe design, pipe sizes and lengths (taking account of flow and return temperatures and diversification), insulation and calculated heat loss from the pipes in Watts, demonstrating heat losses have been minimised together with analysis of stress/expansion;
 - A before and after floor plan showing how the plant room can accommodate a heat substation for future DEN connection. The heat substation shall be sized to meet the peak heat load of the site. The drawings should cover details of the phasing including any plant that needs to be removed or relocated and access routes for installation of the heat substation;
 - Details of the route for the primary pipework from the energy centre to a point of connection at the site boundary including evidence that the point of connection is accessible by the area-wide DEN, detailed proposals for installation for the route that shall be coordinated with existing and services, and plans and sections showing the route for three 100mm diameter communications ducts;

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- Details of the location for building entry including dimensions, isolation points, coordination with existing services and detail of flushing/seals;
 - Details of the location for the set down of a temporary plant to provide heat to the development in case of an interruption to the DEN supply including confirmation that the structural load bearing of the temporary boiler location is adequate for the temporary plant and identify the area/route available for a flue;
 - Details of a future pipework route from the temporary boiler location to the plant room.

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.

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Appeal Decision

Inquiry held on 12, 13, 14, 15, 19, 20, 21 and 26 July 2022

Site visits made on 11 and 21 July 2022

by Jonathan Manning BSc (Hons) MA MRTPI

an Inspector appointed by the Secretary of State

Assisted by Assessor: R Sabu BA (Hons), MA, BArch, PgDip, RIBA, ARB

Decision date: 24th October 2022

Appeal Ref: APP/Y5420/W/21/3289690

The Goods Yard and The Depot, 36 & 44-52 White Hart Lane and 867-879 High Road (and land to the rear), Tottenham, N17 8DP

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant planning permission.
- The appeal is made by Goodsyard Tottenham Limited against the decision of London Borough of Haringey.
- The application Ref HGY/2021/1771, dated 21 June 2021, was refused by notice dated 8 November 2021.
- The development proposed is for (i) the demolition of existing buildings and structures, site clearance and the redevelopment of the site for a residential-led, mixed-use development comprising residential units (C3); flexible commercial, business, community, retail and service uses (Class E); hard and soft landscaping; associated parking; and associated works. (ii) Change of use of No. 52 White Hart Lane from residential (C3) to a flexible retail (Class E) (iii) Change of use of No. 867-869 High Road to residential (C3) use.

Decision

1. The appeal is allowed and planning permission is granted for (i) the demolition of existing buildings and structures, site clearance and the redevelopment of the site for a residential-led, mixed-use development comprising residential units (C3); flexible commercial, business, community, retail and service uses (Class E); hard and soft landscaping; associated parking; and associated works. (ii) Change of use of No. 52 White Hart Lane from residential (C3) to a flexible retail (Class E) (iii) Change of use of No. 867-869 High Road to residential (C3) use, at The Goods Yard and The Depot, 36 & 44-52 White Hart Lane and 867-879 High Road (and land to the rear), Tottenham, N17 8DP, in accordance with the terms of the application, Ref HGY/2021/1771, dated 21 June 2021, subject to the planning conditions in the attached schedule.

Procedural Matters

2. In line with the Inquiry Rules, 2000 an assessor Rekha Sabu was appointed to provide expert advice to me on matters of architecture and

design. The assessor's report is included at Appendix 1 to this decision. Where I have not agreed with the report, I have explained why.

3. I have received a copy of the agreed and executed Section 106 Agreement (S106), dated 2 August 2022. The S106 secures provisions relating to: affordable housing and related viability review; employment & training skills plan; future connectivity; residential and commercial travel plans; car club; car free development; highway works; energy efficiency plan; connection to a district wide energy network; a telecommunications plan; considerate constructors scheme; monitoring costs; infrastructure contributions (community space, library and public realm); business relocation strategy; open space and public access plan; access to Pickford Gardens; and an Enfield controlled parking zone contribution.
4. I am satisfied that in each case the obligations meet the three tests set out in Paragraph 57 of the National Planning Policy Framework (the Framework) for planning obligations, which reflect those set out in Regulation 122 of the Community Infrastructure Levy (CIL) (2010). As a result, I have taken the S106 into account and have not considered such matters any further in my decision.
5. Shortly before the close of the Inquiry, the Council resolved to grant planning permission, subject to a S106 for the development known as 'Lendlease'. The scheme includes the appeal site (reflective of the extant consents), as part of a much larger development that extends to the south and southeast of the appeal site. The Lendlease scheme had not been taken into account in the cumulative assessment of the Environmental Impact Assessment (EIA) for the proposal. Consequently, after the close of the Inquiry an updated assessment of the cumulative effects of the proposed development taking into account the 'Lendlease' scheme and any other recent development was requested under Regulation 25 of the EIA Regulations, 2017.
6. This was subsequently provided, and the Council were also given the opportunity to comment. I have had regard to both the Environmental Statement Addendum (ES Addendum) and the Council's comments in reaching my decision.
7. I understand that the London Boroughs of Barnet, Camden, Enfield, Hackney, Haringey, Islington and Waltham Forest have resolved to adopt the joint North London Waste Plan. Whilst now forming part of the development plan, the document is of limited relevance to this appeal and its adoption does not have any bearing on my overall decision.

Main Issues

8. Having had regard to all of the written and oral evidence, I consider that the main issues of the appeal are:

- the effect of the proposed development on the character and appearance of the area;
- whether the proposed development would preserve or enhance the character or appearance of the North Tottenham Conservation Area;
- the effect of the proposed development on the significance of heritage assets, including: The Grange (Grade II) (No 34 White Hart Lane); 797-799 High Road (Grade II); 819-821 High Road (Grade II); 867-869 High Road (Grade II); and locally listed buildings;
- whether the proposed provision of public open space would comply with development plan policy; and
- in the planning balance whether any harm would significantly and demonstrably outweigh the benefits of the scheme.

Reasons

Preliminary Matters and Policy Context

9. At the Inquiry the relevance of the two extant planning permissions¹ on the appeal site was debated. Based on the evidence provided by the appellant, I see no reason to consider that both extant permissions would not be implemented should this appeal fail and the current planning application being determined by the Council be refused. Further, I consider that there would be sufficient time to implement them before they expire. I therefore afford the fallback position for both extant consents significant weight and they are referred to where necessary throughout this decision.
10. As set out above, shortly before the close of the Inquiry, the Council resolved to grant planning permission, subject to a S106 for the Lendlease scheme. This does not yet represent a planning permission and the site is a large one and its delivery is likely to be relatively complex. For these reasons, there is still some uncertainty about its delivery and therefore I afford it limited weight in the consideration of this scheme.
11. It is common ground between the parties that the Council cannot demonstrate a five-year housing land supply. A figure of 3.87 years was agreed between the parties at the Inquiry. Having regard to Paragraph 11 of the Framework, the policies which are most important for determining the application are therefore out-of-date. In such circumstances, the Framework sets out that permission should be granted unless: the application of policies in the Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole.

¹ Goods Yard – outline planning permission (HGY/2018/0187) and Depot – Appeal Decision APP/Y5420/W/18/3204591 & APP/Y5420/W/18/3204592.

Character and Appearance

12. The first reason for refusal relates to the proposed tall buildings (Goods Yard Blocks A and B and Depot Block A). The Council are of the view that their height, breadth, proximity to each other (including the existing Rivers Apartments tall building 'Brook House'), architectural expression and design would: (i) have an unacceptable adverse effect on long, mid-range and immediate views from the surrounding area, including the wider setting of designated and undesignated heritage assets; (ii) maximise rather than optimise residential density; and (iii) fail to be of a sufficiently high architectural quality expected of such prominent buildings. Matters associated with the setting of designated and undesignated heritage assets are considered later in this report.
13. The assessor's report considers these matters in detail and sets out a description of the appeal site and its surroundings, along with a planning policy summary, which will not be repeated here.
14. The assessor found that the height, breadth and massing of the tall buildings would result in an abrupt change in scale compared with the prevailing local townscape and that this would have an incongruous effect in a number of views and would diminish the spacious and modest character of the surrounding area. For the reasons given in the assessor's report, I agree with this view.
15. However, I am mindful that the spacing of the towers in the extant permissions would have a less harmonious relationship than the proposed tall buildings. I also agree with the assessor that the adverse effect would be tempered by the articulation of the massing and the harmonious relationship between the proposed towers.
16. I see no reason to disagree with the assessor's reasoning that the scheme would optimise rather than maximise residential density, particularly as the Council has not raised any significant concerns in relation to the future living environment of future residents, as agreed in the SOCG.
17. In terms of architectural design, I am in agreement with the assessor that the proposed buildings would have highly articulated facades with a range of materials, textures, colours, tones and layers of depth that would be set out in well-proportioned bays that would result in an exemplary standard of architectural quality. Although, I do share the concerns of the Council with regard to the proposed dark colour of the tops of the tall buildings. However, this matter can be overcome with a planning condition that would require the colour to be agreed with the Council.
18. In addition to all of the above, I would add that the layout of this scheme benefits from a more comprehensive approach that includes both sites as opposed to those of the extant permissions, which is in my view a clear improvement.

19. At the Inquiry there was some discussion over the boundary treatments of Brook House Yard. I consider that the matter can be suitably addressed by a planning condition, requiring the details to be agreed by the Council.
20. Having regard to all of the findings in the assessor's report, the matters discussed above, along with my own observations at the site visits, I agree that the scheme, overall, would cause a low level of harm to the character and appearance of the area due to the scale, height and massing of the tall buildings. This would run contrary to: Policies D3 and D9 of the London Plan, 2021; Policies SP1 and SP11 of the Strategic Policies with alterations, 2017 (the Strategic Policies); Policy DM6 of the Development Management Development Plan Document (DPD), 2017 (the DM DPD); Policies AAP6 and NT5 of the North Tottenham Area Action Plan, 2017 (the AAP); guidance in the adopted High Road West Masterplan Framework, September 2014 (the HRWMF) and Paragraph 130 c) of the Framework. The Council's reason for refusal also includes several heritage related policies. However, such matters and their related policies are considered later in my decision.

Heritage Assets

North Tottenham Conservation Area

21. The North Tottenham Conservation Area includes a number of Georgian and Victorian buildings, some of which are listed and front the High Road and parts of White Hart Lane. The condition of the listed buildings in the conservation area varies and they are interspersed with other poor quality buildings and structures.
22. A principal feature of the Conservation Area is the historic linear continuity of buildings either side of the High Road and the character of the townscape and its sense of spatial sequence highlighted by the mix of Victorian and Georgian buildings that help to give the street its scale and sense of place.
23. The proposed tall buildings would in many views from High Road and White Hart Lane tower above the lower frontage development. The height, scale and more modern appearance of the tall buildings would be prominent on the skyline and would appear incongruous against the modest 18th and 19th century buildings of 2-4 storeys. Notwithstanding this, I consider that the impact of this would to a large degree be reduced by the set back of the tall buildings so that it would appear to form part of a different character area. This is a matter that the Inspector of the previous Goods Yard appeal also found. I consider that the architectural quality of the tall buildings would also help to mitigate such harm.
24. It should also be noted that there would be some enhancements to the Conservation Area. This relates to the proposed street scene

improvements to the northside of White Hart Lane around the Grange/Stationmaster's House and the existing goods yard entrance.

25. Taking all these factors into account, I consider that the scheme would not preserve or enhance the character or appearance of the Conservation Area and would cause less than substantial harm to its significance, as a whole. This would be on the low to moderate end of the scale.

Statutory Listed Buildings

The Grange (Grade II listed)

26. The Grange (listed as 34 White Hart Lane, but actually numbered 32, 34 and 34a) is a mid-18th century house with added 19th century wings either side. It represents one of the earliest developments within the area and has both architectural and historic significance; the former derived from the building's period and detailing, and the later from its period of construction and survival. I agree with the Council that the present and emerging context of the area has greatly compromised its setting. Particularly, the yard entrance with security fencing.
27. I consider that the ancillary activities to the rear of the building give it visual and functional prominence. This hierarchy in the scale and function, between front and back, is a part of the building's setting and contributes positively to its significance.
28. The Council has referred to White Hart Lane once being a country lane, but I observed on my site visit that there is little, if any, remnant of this. Further, I consider the Love Lane estate buildings to be part of the setting of the Grange, given it is in such close proximity. Whilst you generally have your back to the Love Lane estate towers when viewing the Grange, I experienced that you are nonetheless aware of them and can sense their significant presence behind you.
29. The drawings provided show that there would be visual competition between the proposed towers and the other large buildings of the appeal scheme and The Grange. This will draw the eye away from The Grange and would affect the existing hierarchy in scale and function behind it, affecting its significance.
30. However, in the large, I consider that The Grange would still stand out as a striking building. Further, the appeal scheme would help to improve the street scene on White Hart Lane, particularly the existing gap to the west of The Grange. This would bring a greater sense of coherence, enhancing its setting.
31. For these reasons, I consider that overall, there would be less than substantial harm caused to the significance of The Grange, at the lower end of the scale.

797-799 High Road (Grade II listed), 819-821 High Road (Grade II listed) and 867-869 High Road (Grade II listed)

32. As pointed out in the Council's closing submissions, the essence of the significance of these assets is their place within the linear High Road, both as buildings within the street scene and in the cases of 819-821 and 867-869 High Road, as buildings which are prominent in signifying the status of the High Road from adjoining side streets.
33. Whilst noting that the Inspector of the extant permission appeal decision for the Goods Yard scheme did not find any harm in relation to each of these buildings, this appeal scheme would deliver taller buildings that would be broader in the east/west viewing perspective. I consider there would therefore be a greater level of impact.
34. The three tall buildings would distract attention away from each of the buildings affecting their significance. Whilst there would be an alteration to the built hierarchy, I agree with the previous Inspector of the Goods Yard scheme that the towers would, to a large degree, appear to belong to an area of different character beyond the Conservation Area. I consider that this notably contributes to mitigating the impact of the scheme on the setting of these listed buildings.
35. Consequently, I consider that there would be less than substantial harm to the significance of both 797-799 High Road and 819-821 High Road at the low end of the scale.
36. In terms of 867-869 High Road, I consider that the above findings equally apply. However, the setting of 867-869 High Road is heavily compromised by the car park to the north and west alongside the hard standing for the supermarket. I consider the setting of the buildings would be enhanced by the removal of this and the fact that the buildings would be integrated into a well-designed townscape. Overall, I consider that there would be a neutral effect on the setting of 867-869 High Road and therefore no harm to their significance.
37. It should also be recognised that 867-869 High Road form part of the proposed development and would be reinstated and brought back into residential use, helping to secure their future. I consider this to be a clear heritage benefit.

Non-Designated Heritage Assets

38. Stationmaster's House is an attractive Victorian detached two-storey house that was built following the opening of White Hart Lane station in 1872. Its current setting is dominated by the Goods Yard part of the appeal site. Immediately to its east, the gap in the street frontage, breaks the cohesive streetscape available further to the east. I consider that these factors detract from its setting.
39. The building's conservation to a viable new use is considered a positive aspect of the proposal. The scheme would deliver a new corner building

to the east of Stationmaster's House, which steps up towards the corner. This would respect the building line of Stationmaster's House. However, whilst stepped, it would be greater in height and in my view would somewhat detract from Stationmaster's House given its very close proximity.

40. The tall buildings would also be clearly visible behind the Stationmaster's House which would also attract attention away from it. There would, however, be a courtyard behind Stationmaster's House to preserve something of the sense of its former garden. The area around the Stationmaster's House would also be landscaped, with surfacing together with soft landscaping.
41. Overall, there will be some harm caused to the setting of Stationmaster's House but there would also be some clear enhancements. I consider when weighed up, these result in an overall neutral effect on the non-designated heritage asset.
42. There are quite a number of locally listed buildings on the western side of High Road. In addition, the Council has raised concerns about the impact on 8-18 and 24-30 White Hart Lane, which although are not locally listed, have been identified as non-designated heritage assets by the Council. The main parties agree that there would be a low or minor level of harm to the settings of these buildings. I agree with this view, due to the visibility of the proposed towers that would draw the eye away from the buildings.

Heritage Balance

43. I have found that the scheme would cause less than substantial harm to the North Tottenham Conservation Area, The Grange, 797-799 High Road and 819-821 High Road. With the exception of the Conservation Area where there would be a low to moderate level of less than substantial harm, this would, in each case, be at the lower end of the scale. I afford great weight to the identified harm, in accordance with Paragraph 199 of the Framework.
44. Paragraph 202 of the Framework sets out that where a scheme 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.
45. The public benefits of the scheme are very substantial and as explained fully later in the planning balance section, include: much needed market and affordable housing delivery; supporting the regeneration of Tottenham; helping to deliver the objectives of the HRWMF; economic benefits through job creation and spending of future residents; and biodiversity enhancements.
46. I consider that the public benefits of the scheme clearly outweigh the above identified harm to designated heritage assets. The scheme

complies with Paragraph 202 of the Framework and therefore, heritage does not form a clear reason for refusal for the purposes of Paragraph 11 d) i) of the Framework.

47. There would also be a low/minor level of harm caused to numerous non-designated heritage assets that need to be taken into account in the planning balance, in line with Paragraph 203 of the Framework. I consider such matters later in the decision.
48. Whilst there is some conflict with the wording of Policy SP12 of the Strategic Policies, Policies DM6 and DM9 of the DM DPD and Policy AAP5 of the AAP, these do not include the balancing exercise set out in the Framework and therefore this does not weigh against the scheme. The Council's reason for refusal in this regard also includes several other policies. However, I do not consider these relate directly to heritage matters.

Open Space

49. It is common ground between the parties that the appeal scheme will provide for 8,608 square metres of publicly accessible open space and 6,945 square metres of private communal open space. There is no dispute over the quality of the open space provided, but rather the quantity.
50. Policy DM20 of the DM DPD is the only policy to set out clear numerical standards for the provision of open space, although to some degree this is replicated by Policy SP13 of the Strategic Policies, which both require provision to be made in accordance with the Haringey Open Space and Biodiversity Study, 2013 (the Open Space Study). Policy DM20 at criterion F sets out that for sites over 1ha which are located in an identified area of deficiency, schemes should seek to provide for on-site publicly accessible open space in line with the space standards set out in the Open Space Study, subject to viability.
51. Approximately 60% of the site is located in an area of open space deficiency. For the purposes of calculating the necessary level of open space, there is dispute between the parties whether based on a fair reading of Policy DM20, the whole site or 60% of the site should be treated as being in an area of deficiency.
52. There is no further guidance provided in the policy or the supporting text for circumstances where the site is partially in an area of deficiency. Based on the above study that requires 1.64 hectares of open space per 1,000 people within areas of deficiency, the scheme would need to provide 18,000 square metres if the site was considered only 60% within the deficiency area and 29,684 square metres if all of the site was considered in the area of deficiency.
53. In either case the scheme would not provide sufficient open space to meet the requirements of Policy DM20. Further, Policy DM20 is clear

that the open space must be publicly open. In this case, only 8,608 square metres would be publicly accessible, with the rest being private communal space for the future residents of the scheme.

54. The appellant has pointed out that Policy DM20 refers to 'seek to' rather than must or shall. However, in my view, it is clear when reading the policy as a whole that the only circumstance set out where a lower level of open space provision may be justified would be based on viability grounds as set out in criterion F. Which is not the case here.
55. The Council raised concerns over the calculated population from the scheme and whether it was the inner or outer London 'Geographic Aggregation'. However, as demonstrated by the appellant these had no material effect on the overall requirement.
56. Given the above there is therefore, in my view, a substantial shortfall against the requirements of Policy DM20 and a subsequent policy conflict whether all or part of the site is considered to be in an area of deficiency.
57. However, I consider that there are a number of important other factors relevant to this matter. Firstly, the appeal site falls within site allocation NT5 of the AAP, which at Paragraph 5.125 includes a description of the allocation that includes a requirement to uplift the amount and quality of open space. Under the 'site requirements' there is a requirement for new social infrastructure proportionate to the population growth in the area and specifically the provision of new and enhanced public open space. This includes a large new community park and high-quality public square along with a defined hierarchy of interconnected pedestrian routes. Finally, under development guidelines it requires provision of a net increase in the amount and the quality of both public open space and private amenity space within the area.
58. Site Allocation NT5 also refers to the requirement for any development to comply with the principles of the most up-to-date Council approved masterplan. The HRWMF itself acknowledges that the level of open space provision proposed in the Masterplan Framework, whilst significantly increasing the amount of open space, would not meet the amount required by the current Open Space Study standards (Paragraph P106). The HRWMF also notes that in the context of wider open space assets and with a focus on high quality spaces and effective management strategies the proposed provision in the masterplan is considered appropriate.
59. I consider that the appeal scheme would meet all of the open space requirements set out in Site Allocation NT5 of the AAP and is in accordance with the HRWMF in this regard.
60. Secondly, the requirements in the Open Space Study date back to 2013. Since then, the London Plan, 2021 includes Good Growth Policies (GG2 and GG3) and Design Policies (D3 and D6) which has seen a clear shift

towards seeking to optimise development. The London Plan Housing Supplementary Planning Guidance (SPG), 2016 also post-dates the 2013 study and acknowledges that a balance must be struck and that this may generate comparatively reduced on-site requirements for social infrastructure, play and open space provision, thus enabling higher residential densities to be achieved.

61. Thirdly, as set out in the appellant's closing submissions, the appeal scheme maintains roughly the same amount of public space as the extant permissions but then also includes substantially more private communal open space. There would therefore be a general improvement over the extant permissions. Whilst the private communal open space would only be for the future residents of the scheme, I accept the appellant's view that it would take pressure of the publicly open space available to the existing residents and visitors to the area.
62. The Council has referred to Policy DM12 of the DM DPD in its reason for refusal. This requires the provision of additional open space in areas of especially poor residential quality. Even if the appeal site fell into this category, the scheme provides additional open space so would comply with Policy DM12.
63. Whilst there is conflict with Policy DM20 of the DM DPD and SP13 of the Strategic Policies, the scheme would comply with Site Allocation NT5 of the AAP, Policy DM12 of the DM DPD, Policies GG2 and D3 of the London Plan, guidance in the HRWMF and Paragraphs 7, 93 and 98 of the Framework. Overall and having regard to all of the above matters, I consider that the scheme makes appropriate provision for publicly available open space, whether all or part of the site is considered within an area of deficiency. Policies AAP5 and AAP6 have also been referred to in the Council's reason for refusal. However, I do not consider these to be particularly relevant to the matter of open space.
64. The appellant has set out that the provision of open space should be considered as a benefit of significant weight. However, given my findings above, I consider it is a matter of neutral weight in the overall balance.

Other Matters

65. Interested parties have raised a number of other matters. These relate to concerns with regard to: wind conditions; subsidence; noise and vibration impacts, including from trains to future residents; health and safety issues, including cladding; and parking issues. Having regard to the supporting evidence to the application in relation to such matters, I am content that, taking into account any necessary planning conditions and the role of building regulations, there would be no unacceptable impacts in relation to such matters.
66. The impact on the existing residents of the Rivers Apartments buildings (including the Brook House tall building) and other buildings along

Cannon Road, in relation to loss of privacy, overshadowing and loss of daylight and sunlight has raised a number of objections. The closest tall building to Rivers Apartments would be closer than that of the extant consent. However, it would still be located some 30 metres away, which in my view is still a significant distance and sufficient to ensure that there is no unacceptable overlooking. It is also well over the 18-21 metres general yardstick separation distance referred to in the Mayor of London's Housing SPG, 2016.

67. There would be some adverse impacts in terms of overshadowing and loss of daylight and sunlight to neighbouring properties in the area, including the Rivers Apartments. However, having regard to all of the evidence before me, I consider that the loss of daylight or sunlight would not lead to unacceptable living conditions for the occupants of the properties affected.
68. The impacts from construction would be temporary and appropriate working hours and working practices can be suitably secured by a planning condition to avoid unacceptable impacts on the living conditions of neighbouring residents. There have been suggestions that there is insufficient infrastructure to cope with the additional development. However, I have not been provided with any substantive evidence to support such a view. Although not a planning matter, there is also no evidence to suggest that the scheme would devalue nearby existing properties.
69. There is no evidence to suggest that the consultation undertaken by the Council on the amendments to the scheme was not appropriate.

Planning Balance and Conclusion

70. As set out above, the Council cannot demonstrate a five-year housing land supply. In accordance with the Framework, the policies which are most important for determining the application are therefore out-of-date. I have found that the identified heritage harm does not constitute a clear reason for refusal for the purposes of Paragraph 11 d) i) of the Framework. Consequently, permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole (the 'tilted balance').
71. The scheme would deliver 867 new homes, which I consider to be a public benefit of substantial weight, particularly in the context of the Council's significant shortfall in housing land supply. Whilst I acknowledge that the Council's housing delivery has improved in more recent times, there is clearly still some way to go, and the scheme would make an important and significant contribution.
72. Of the 867 new homes between 35.9% and 40% (depending on the availability of grant funding) would also be affordable. The Council has questioned whether the level of affordable housing has been maximised.

However, it is common ground that the level of affordable housing is policy compliant. The appellant has also provided evidence that shows the Council's affordable housing delivery in recent years has been relatively low. Consequently, I also give the benefit of the delivery of much needed affordable housing substantial weight in the planning balance.

73. There would be some heritage benefits associated with the proposed development. It would secure the future of the Listed Buildings at 867-869 High Road and would secure the future of the locally listed Stationmaster's House. I afford these matters a limited level of weight.
74. I also afford some weight to the fact that the scheme would make a positive contribution towards the regeneration of Tottenham, which has areas amongst the most deprived in the country and could act as a catalyst for further regeneration and inward investment. It would also help to deliver the objectives of the HRWMF.
75. There would be economic benefits associated with employment, including for local people and the spending generated from future occupants, as well as benefits derived from the new business floorspace. I afford this moderate weight in the balance. Finally, there would also be ecological and biodiversity enhancements, including an overall net gain in biodiversity. These factors attract limited weight in favour of the scheme.
76. In contrast to the identified benefits, I have found that the scheme would cause harm in several ways. The proposal would cause a low level of harm to the character and appearance of the area. There would be some less than substantial harm to the significance of several designated heritage assets, to which I afford great weight. There would also be some minor harm caused to numerous non-designated heritage assets that needs to be weighed in the balance.
77. I consider that the scheme conflicts with the development plan when considered as a whole. However, having regard to the 'tilted balance', the benefits of the scheme are very substantial indeed and the identified harm does not significantly and demonstrably outweigh those benefits. Consequently, there are material considerations to warrant a decision other than in accordance with the development plan. For the reasons given above and having regard to all other matters raised, the appeal is therefore allowed.

Planning Conditions

78. As a result of the appeal succeeding, there is a need to consider what planning conditions are necessary. I have considered the suggested conditions against the tests set out within the Framework and the advice provided by the Government's Planning Practice Guidance and have amended them where required. As well as the standard time limit condition (1), a condition is necessary to ensure the development is

undertaken in accordance with the approved plans to secure certainty (2). To ensure the suitable implementation and phasing of the scheme, condition (3) is required.

79. To suitably secure the business aspects of the scheme, condition (4) is imposed. Condition (5) is needed to ensure an adequate supply of accessible housing. To safeguard the living conditions of neighbouring residents, to provide suitable conditions for visitors to the development and/or to ensure suitable living conditions for future occupants of the scheme, conditions (6), (7), (9), (10), (11), (15), (46), (47) and (49) are imposed.
80. Condition (12) is necessary to ensure fire safety measures are incorporated in the development. Conditions (13), (14), (16), (18), (20) (50), (51) and (52) are needed to ensure the suitable appearance of the scheme and/or the protection of trees. To ensure sustainable development and/or energy efficiency, conditions (8), (21), (22), (23), (24), (25), (26) and (27) are required. In the interests of biodiversity, conditions (17) and (19) are imposed.
81. To ensure that there would be no unacceptable risk of crime or anti-social behaviour, conditions (28) and (29) are required. In the interests of archaeology and/or contaminated land, conditions (30), (31), (32), (34) (35) and (36) are necessary.
82. To ensure there would be no impacts on existing infrastructure surrounding the site, conditions (33), (45) and (48) are imposed. In the interests of highway safety and promoting sustainable modes of transport, conditions (37), (38), (39), (40), (41), (42), (43) and (44) are necessary.
83. A number of the above imposed conditions relate to pre-commencement activities. In each case, I am satisfied that the condition is necessary to make the development acceptable in planning terms and it would have been otherwise necessary to refuse planning permission. Further, the appellant has provided written confirmation that they accept the pre-commencement conditions.

Jonathan Manning

INSPECTOR

SCHEDULE OF PLANNING CONDITIONS

- 1) The development hereby permitted shall be begun before the expiration of three years from the date of this permission.
- 2) The proposed development shall be carried out in all respects in accordance with the proposals contained in the application and the approved plans set out in Appendix 2 to this decision.
- 3) (a) No Development, excluding site preparation works, shall commence on any Phase until a Phasing Plan has been submitted to and approved in writing by the Local Planning Authority.
 (b) The Phasing plan shall set out a breakdown of the following for each identified Phase:
 - (i) Number of dwellings (including dwelling mix and tenure)
 - (ii) Children's play space
 - (iii) Car parking spaces
 - (iv) Cycle parking spaces
 - (v) Details of interim boundary treatments
 (c) The development shall be carried out in accordance with the approved Phasing Plan and the approved interim boundary treatments shall be maintained in good condition until such times as they are replaced by permanent boundary treatments approved under Condition 13.
- 4) (a) The non-residential floorspace hereby approved shall include at least 400sqm of Business floorspace (Use Class E (g) (i) (ii) or (iii)).
 (b) Notwithstanding the provisions of the Town and Country Planning (Use Classes) Order 1987 (as revised), or any Order or Regulations that revoke or further revises this Order, the 400sqm of Business floorspace that is provided under (a) above shall only be used for offices, research and development and industrial processes in perpetuity.
- 5) The detailed design for each dwelling in Goods Yard Blocks A, B, C, D, E, F and G and Depot Blocks A, B, C, D, E, F and G hereby approved shall meet the required standard of the Approved Document M of the Building Regulations (2015). The following dwellings shall meet Approved Document M, M4(3) (2b) ('wheelchair user dwellings'):
 - Block A: GY-L00-A-01, GY-L01-A-01, GY-L02-A-01, GY-L02-A-04, GY-L02-A-05, GY-L02-A-08, GY-L03-A-04, GY-L03-A-05, GY-L03-A-08, GY-L04-A-04, GY-L04-A-05, GY-L05-A-04, GY-L05-A-05, GY-L06-A-04, GY-L06-A-05, GY-L29-A-03, GY-L29-A-04, GY-L30-A-03, GY-L30-A-04, GY-L31-A-03 & GY-L31-A-04.
 - Block B: GY-L00-B-01, GY-L00-B-02, GY-L00-B-03, GY-L01-B-01,

GY-L01-B-05, GY-L02-B-04, GY-L03-B-04, GY-L04-B-04, GY-L05-B-04, GY-L06-B-04, GY-L07-B-04, GY-L08-B-04, GY-L09-B-04, GY-L10-B-04, GY-L11-B-04, GY-L12-B-04, GY-L13-B-04, GY-L14-B-04 & GY-L15-B-04.

- Block C: GY-L01-C-03 & GY-L01-C-04.
- Block D: GY-L05-D-01.
- Block E: GY-L02-E-01 & GY-L03-E-01.
- Block F: GY-L00-F-01, GY-L00-F-02 & GY-L02-F-04.
- Block G: GY-L01-G-01 & GY-L03-G-01.
- Block ABC: TD-L00-A-01-AC, TD-L01-A-01-AC, TD-L01-A-05-AC, TD-L01-C-01-AC, TD-L02-A-06-AC, TD-L02-B-03-AC, TD-L03-A-06-AC, TD-L03-B-03-AC, TD-L04-A-06-AC, TD-L04-B-03-AC, TD-L05-A-06-AC, TD-L05-B-03-AC, TD-L07-A-04-AC, TD-L08-A-04-AC, TD-L08-B-04-AC, TD-L11-A-04-AC, TD-L12-A-04-AC, TD-L13-A-04-AC, TD-L14-A-04-AC, TD-L15-A-04-AC, TD-L16-A-04-AC, TD-L23-A-02-AC, TD-L24-A-02-AC, TD-L25-A-02-AC, TD-L26-A-02-AC, TD-L26-A-06-AC, TD-L27-A-06-AC & TD-L28-A-06-AC.
- Block D: TD-L00-D-01-AC, TD-L00-D-06-AC, TD-L02-D-03-AC & TD-L02-D-04-AC.
- Block E: TD-L00-E-01 & TD-L00-E-04-AC.
- Block G: TD-L03-G-03-AC, TD-L04-G-04-AC & TD-L05-G-02-AC.

All other dwellings shall meet Approved Document M M4(2) ('Accessible and adaptable dwellings').

- 6) (a) No ground floor commercial unit shall be occupied as a café/restaurant (Use Class E(b)) until such times as full details of ventilation and extraction of fumes have been submitted to and approved in writing by the Local Planning Authority.

(b) The approved ventilation and fume extraction measures shall be completed and made operational prior to the first occupation of the unit as a café/restaurant (Use Class E(b)), in accordance with the approved details and shall be permanently maintained thereafter.
- 7) Any café/restaurant use (Use Class E(b)) shall only be open to the public between the hours of 07.00 to 23.00 (Monday to Saturday) and 08.00 to 23.00 (Sundays and Public Holidays).
- 8) (a) Prior to commencement of any non-residential use with each relevant Phase (as identified in an approved Phasing Plan), a design stage accreditation certificate for that phase must be submitted to the Local Planning Authority confirming that the development will achieve a BREEAM "Very Good" outcome (or equivalent) for each non-residential use within that phase.

- (b) The relevant Phase shall then be constructed in strict accordance with the approved details, shall achieve the agreed rating and shall be maintained as such thereafter for the lifetime of the development.
- (c) Prior to occupation of any non-residential use within each relevant Phase, a post-construction certificate issued by the Building Research Establishment (or equivalent) for each non-residential use in that phase must be submitted to and approved in writing by the Local Planning Authority, confirming this standard has been achieved.
- (d) In the event that any non-residential use fails to achieve the agreed rating, a full schedule and costings of remedial works required to achieve this rating shall be submitted to and approved in writing by the Local Planning Authority within 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 Local Planning Authority for off-site remedial actions.
- 9) (a) No development of Goods Yard Blocks E, F, G and H and Depot Blocks B and G at slab level or above shall commence until such times as full details of the floor slab and any other noise attenuation measures between the ground floor commercial unit and dwellings on the first floor have been submitted to and approved in writing by the Local Planning Authority.
- (b) The details shall be designed to ensure that at any junction between dwellings and the ground floor commercial unit, the internal noise insulation level for the dwellings is no less than 60 dB DnT,w + Ctr.
- (c) The approved floor slab and any other noise attenuation measures shall be completed in accordance with the approved details, prior to the occupation of any of the first floor dwellings directly above the commercial unit and shall be maintained thereafter.
- 10) (a) The dwellings hereby approved in Good Yard Blocks A, B, C, D, E, F and G and Depot Blocks A, B, C, D, E, F and G shall not be occupied until such times as full details of the glazing specification and ventilation for habitable rooms in all façades of the dwellings to which they relate have been submitted to and approved in writing by the Local Planning Authority.
- (b) The above details shall be designed in accordance with BS8233:2014 'Guidance on sound insulation and noise reduction for buildings' and meet the following noise levels;

Time	Area	Average Noise level
Daytime Noise 7am –	Living rooms &	35dB(A)

11pm	Bedrooms	(LAeq,16hour)
	Dining Room Area	40dB(A) (LAeq,16hour)
Night Time Noise 11pm - 7am	Bedrooms	30dB(A) (LAeq,8hour)

With individual noise events not to exceed 45 dB LAmax (measured with F time weighting) more than 10-15 times in bedrooms between 23:00hrs – 07:00hrs.

(c) The approved glazing specification and ventilation measures for the habitable rooms in all facades of the dwellings shall be installed and made operational prior to the occupation of any of the dwellings to which they relate in the Block as specified in part (a) of this condition and shall be maintained thereafter.

- 11) (a) The ground floor commercial unit in Depot Block G shall not be occupied as a Café/Restaurant (Use Class E(b)) until such times as landscaping details for the associated space immediately to the west of the unit (in the Detailed Element) that include wind mitigation measures that are designed to ensure the Lawson Criteria Comfort Rating for 'Long-term Sitting' (C4) have been submitted to and approved in writing by the Local Planning Authority.

(b) The approved wind mitigation measures shall be implemented prior to the first occupation of the unit as a Café/Restaurant (Use Class E(b)) and shall be permanently maintained thereafter when the unit is in use.
- 12) The Development must be carried out in accordance with the provisions of the Fire Statement (HRW-BHE-GD-XX-RP-YD-0001, Revision P05) prepared by Buro Happold, dated 10 September 2021.
- 13) (a) The following external landscaping details of external areas and amenity areas for each relevant Phase (as identified in an approved Phasing Plan) shall be submitted to and approved in writing by the Local Planning Authority before any Block in the Phase in which it is located commences above ground floor slab level:
 - i) Hard surfacing materials;
 - ii) Drinking water fountain/dispenser providing drinking water that is free to users in Peacock Park;
 - iii) Children's play areas and equipment;
 - iv) Boundary treatments;
 - v) Any relevant SuDs features (as identified in the Drainage Strategy (HRW-BHE-GD-XX-RP-C1-0001, Revision P03), dated 27 May 2021);

- vi) A SUDS management and maintenance plan for the proposed SUDS features, detailing future management and maintenance responsibilities for the lifetime of the development;
- vii) Minor artefacts/structures (e.g. furniture, refuse or other storage units and signs);
- viii) Proposed and existing functional services above and below ground (e.g. drainage power, communications cables, pipelines, indicating lines, manholes and supports);
- ix) Planting plans and a full schedule of species of new trees and shrubs proposed to be planted noting species, plant sizes and proposed numbers/densities where appropriate;
- x) Any food growing areas and soil specification;
- xi) Written specifications, including cultivation and other operations associated with plant and grass establishment; and
- xii) Implementation programme.

(b) The external landscaping and SUDS features shall be carried out in accordance with the approved details, management and maintenance plan and implementation programme.

- 14) Any trees or plants which within 5 years from them being planted die, are removed, or become seriously damaged or diseased shall be replaced in the next planting season with the same size and species or an approved alternative as agreed in writing by the Local Planning Authority.
- 15) (a) Within 30 days of the demolition of any existing buildings on The Depot part of the site, written details of temporary landscaping and/or the temporary use of the land left vacant by the demolition shall be submitted to and approved in writing by the Local Planning Authority.
- (b) The implementation of approved temporary landscaping and/or temporary use of the land shall be implemented within 90 days of the written approval of details (as required by part (a) above) and shall be maintained thereafter in accordance with the approved details.
- 16) (a) No development shall commence of the Depot Blocks E, F or G until adequate steps have been taken in accordance with 'Section 8 of BS 5837 Trees' to safeguard all trees to be retained (Trees 3001, 3002, 3003 and 3004 as identified on Drawing 37-1030.02) in the submitted Tree Survey (CC37-1030, dated May 2021) against damage prior to or during building works, including the erection of fencing.
- (b) Protective fences shall be erected to the extent of the crown spread of the trees, or where circumstances prevent this, to a minimum radius of 2m from the trunk of the tree and such protection shall be retained until works of demolition and construction have been completed.

- (c) No excavation site works, trenches or channels shall be cut, or pipes or services laid in such a way as to cause damage to the root structure of trees to be retained (as identified in (a) above).
- 17) a) Prior to occupation of the first Block in a Phase (as identified in an approved Phasing Plan) details of ecological enhancement measures for that Phase shall be submitted to and approved in writing by the Local Planning Authority. This shall be consistent with the recommendations of the Ecological Appraisal Report, dated 27 May 2021 and detail the biodiversity net gain, plans showing the proposed location of ecological enhancement measures (including bat boxes, bird boxes and bee bricks), a sensitive lighting scheme, justification for the location and type of enhancement measures by a qualified ecologist, and how the development will support and protect local wildlife and natural habitats.
- (b) Prior to the occupation of the last Block in a Phase (as identified in an approved Phasing Plan), photographic evidence and a post-development ecological field survey and impact assessment of that phase shall be submitted to and approved in writing by the Local Planning Authority to demonstrate the delivery of the ecological enhancement and protection measures is in accordance with the approved measures and in accordance with CIEEM standards.
- (c) Development shall accord with the details as approved and retained for the lifetime of the development.
- 18) (a) No development of any Block in a Phase (as identified in an approved Phasing Plan) shall commence above ground floor slab level until all proposed external materials and elevational details for that Block have been submitted to and approved in writing by the Local Planning Authority. These external materials and details shall include:
- i). External facing materials and glazing, including sample boards of all cladding materials and finishes;
 - ii) Sectional drawings at 1:20 through all typical external elements/facades, including all openings in external walls including doors and window-type reveals, window heads and window cills;
 - iii) Sectional and elevational drawings at 1:20 of junctions between different external materials, balconies, parapets to roofs, roof terraces and roofs of cores;
 - iv) Plans of ground floor entrance cores and entrance-door thresholds at 1:20 and elevations of entrance doors at 1:20;
- (b) The development shall be carried out in accordance with the approved details and materials.
- 19) (a) Prior to the commencement of a Block above ground floor slab level in a Phase (as identified in an approved Phasing Plan), details of any living roofs for Blocks in that phase shall be submitted to and approved

in writing by the Local Planning Authority. Living roofs shall be planted with flowering species that provide amenity and biodiversity value at different times of year. Plants shall be grown and sourced from the UK and all soils and compost used must be peat-free. The submission shall include:

- i. A roof plan identifying where the living roofs will be located;
- ii. A ground floor plan identifying where the living walls will be rooted in the ground, if any;
- iii. Sections demonstrating installed and expected settled substrate levels of no less than 120mm for extensive living roofs, and no less than 250mm for intensive living roofs;
- iv. Roof plans annotating details of the diversity of substrate depths and substrate types across the roof to provide contours of substrate, including annotation of substrate mounds and sandy piles in areas with the greatest structural support to provide a variation in habitat, with a minimum of one feature per 10m² of living roof;
- v. Roof plans annotating details of the location of semi-buried log piles / flat stones for invertebrates, with a minimum footprint of 1m² and at least one feature per 10m² of living roof;
- vi. Details on the range of native species of (wild) flowers, herbs in the form of seeds and plug plants planted on the living roofs, or climbing plants planted against walls, to benefit native wildlife;
- vii. Roof plans and sections showing the relationship between the living roof areas and photovoltaic array; and
- viii. Management and maintenance plan, including frequency of watering arrangements.

(b) Prior to the occupation of 90% of the dwellings, evidence must be submitted to and approved by the Local Planning Authority that the living roof has been delivered in line with the details set out in point (a). This evidence shall include photographs demonstrating the measured depth of soil/substrate planting and biodiversity measures. If the Local Planning Authority finds that the living roof has not been delivered to the approved standards, the applicant shall rectify this to ensure it complies with the condition. The living roof(s) and/or walls shall be retained thereafter for the lifetime of the development in accordance with the approved management arrangements.

- 20) (a) No development shall commence above ground floor slab level of Depot Block D until details of either a stand-alone boundary fence and/or details of the treatment of the rear ground floor boundary elevation of the ground floor parking area have been submitted to and approved in writing by the Local Planning Authority.

(b) The approved boundary fence and/or building elevation shall be provided in accordance with the approved details, before any dwelling in Depot Block D is first occupied and shall be maintained thereafter.

21) (a) Prior to the commencement of works above ground floor slab level for a Block in a Phase (as identified in an approved Phasing Plan), an updated Energy Strategy for that phase must be submitted with Design Stage SAP worksheets based on the Sustainability and Energy Statement (HRW-BHE-GD-XX-RP-YS-0001, Revision P07) dated 28 October 2021. The development shall achieve minimum carbon emissions savings of 64% over 2013 Building Regulations Part L with SAP2012 carbon factors, with a minimum solar PV array of 168 kWp on the Goods Yard part of the site and minimum 45 kWp on the Depot part of the site. The updated Strategy shall include:

- i. Explanation as to how the Development phase achieves minimum carbon reductions at the Be Lean Stage of 8% for the domestic new build and 16% for the non-domestic new build elements (SAP2012 carbon factors);
- ii. An air tightness delivery strategy;
- iii. Detailed thermal bridging calculations demonstrating how thermal bridging shall be reduced;
- iv. Detailed design of the heat network within the Blocks and how this complies with CIBSE CoP1 and the LBH Generic Specification. This shall include detailed calculation of distribution losses (based on pipe routes and lengths, pipe sizes, taking account of F&R temperatures and diversification and insulation) to calculate total heat loss from the system expressed in W/dwelling and should demonstrate losses have been minimised;
- v. A strategy for the supply of heat to any phases occupied before a connection is made to an off-site District Energy Network;
- vi. A strategy that ensures heat can be supplied to the other sites within the High Road West masterplan area via this development site;
- vii. Further detail of how the developer shall ensure the performance of the system will be safeguarded through later stages of design, construction and commissioning including provision of key information on system performance required by CoP1; and
- viii. A metering strategy.

(b) Within six months of first occupation of any dwellings, evidence shall be submitted in writing to the Local Planning Authority that the development has been registered on the GLA's Be Seen energy monitoring platform.

(c) The final agreed Energy Strategy shall be operational prior to the first occupation of the development. The development shall be carried out strictly in accordance with the approved details and shall be operated and maintained as such thereafter.

- 22) (a) Prior to the occupation of any non-residential floorspace in a relevant Phase (as identified in an approved Phasing Plan), an Overheating Report for that phase must be submitted to and approved in writing by the Local Planning Authority only if that space is to be occupied in accordance with the NCM Activity Database or will accommodate any vulnerable users, such as office/workspace, community, healthcare, or educational uses.
- (b) The report shall be based on the current and future weather files for 2020s, 2050s and 2080s for the CIBSE TM49 central London dataset. It shall set out:
- i. The proposed occupancy profiles and heat gains in line with CIBSE TM52.
 - ii. The modelled mitigation measures which will be delivered to ensure the development complies with DSY1 for the 2020s weather file.
 - iii. A retrofit plan that demonstrates which mitigation measures would be required to pass future weather files, with confirmation that the retrofit measures can be integrated within the design.
 - iv. The mitigation measures hereby approved shall be implemented prior to occupation and retained thereafter for the lifetime of the development.
- 23) (a) Prior to occupation of a Block in a Phase (as identified in an approved Phasing Plan), the approved dwellings in that Block shall be built in accordance with the approved overheating measures in line with the Sustainability and Energy Statement prepared by Buro Happold (dated 28 October 2021, Rev P07) and retained thereafter for the lifetime of the development. This shall include:
- i. Natural ventilation, with 100% (bedroom) and 30% (LKD) of openable area at night;
 - ii. Acoustic louvres for noise attenuated ventilation (30% free area);
 - iii. Ceiling fans;
 - iv. Glazing g-values of 0.35 and 0.30;
 - v. Vertical side fins;
 - vi. MVHR with summer bypass; and
 - vii. No active cooling.

- 24) (a) Prior to the occupation of any Block in a Phase (as identified in an approved Phasing Plan), a Post Completion Report for that phase setting out the predicted and actual performance against all numerical targets in the Detailed Circular Economy Statement (HRW-BHE-GY-XX-RP-YZ-GY-0001, Revision P04), dated 27 May 2021 shall be submitted to the GLA at: circulareconomystatements@london.gov.uk and the Local Planning Authority, 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.
- (b) The Post Completion Report shall be approved in writing by, the Local Planning Authority, prior to occupation of the Block to which it relates.
- 25) (a) Prior to the occupation of a Block in a Phase (as identified in an approved Phasing Plan), the post-construction tab of the GLA's whole life carbon assessment template for that phase shall be completed accurately and in its entirety in line with the GLA's Whole Life Carbon Assessment Guidance.
- (b) The post-construction assessment required in part (a) shall provide an update of the information included in the Whole Life-Cycle Carbon Assessment included in the Sustainability and Energy Statement (HRW-BHE-GD-XX-RP-YS-0001, Revision P07) dated 28 October 2021, including the whole life carbon emission figures for all life-cycle modules based on the actual materials, products and systems used. This shall be submitted to the GLA at: ZeroCarbonPlanning@london.gov.uk and the Local Planning Authority, along with any supporting evidence as per the guidance.
- (c) The post construction assessment shall be approved in writing by the Local Planning Authority, prior to the occupation of the phase to which it relates.
- 26) (a) Upon final completion of the last Block in a relevant Phase (as identified in an approved Phasing Plan), suitable devices for the monitoring of the energy use and renewable/low-carbon energy generation (by residential unit) shall have been installed in each Block in that Phase, and the monitored data for each Block in that phase shall be submitted to the Local Planning Authority at daily intervals for a period of five years from final completion.
- (b) The installation of the monitoring devices and the submission of the data shall be carried out in accordance with the principles of the London Plan Guidance 'Be Seen' energy monitoring guidance.
- 27) Installed PV Arrays shall be maintained in good working order or replaced as necessary and cleaned at least annually for the lifetime of the scheme.

- 28) (a) The Public Realm/Children's Play Space immediately to the east of Depot Block E (as identified on Proposed GA Ground Floor Plan, reference 'DEPOT-F3-Z4-00-GA-A- 89006, Rev P2) shall only be used as an extension to the Brook House School playground until such times as a Management & Maintenance Plan that allows for non- school related uses has been submitted to and approved in writing by the Local Planning Authority. The Plan shall set out details of the following:
- i) Days and times when the space is to be open for use by residents of the approved development for non-school related specified activities.
 - ii) Measures to discourage and manage anti-social behaviour
 - iii) Management and maintenance responsibilities to ensure that there is no impediment to use of the space for the approved non-school related specific activities
- (b) The Management & Maintenance Plan may be revised from time to time with the written approval of the Local Planning Authority and all those responsible for managing and maintaining the space.
- (c) The Space shall be used, managed and maintained for non-school related activities only in accordance with the approved Management & Maintenance Plan.
- 29) (a) Prior to the first occupation of each Block in a Phase (as identified in an approved Phasing Plan), a 'Secured by Design' accreditation shall be obtained for that phase and thereafter all features are to be permanently retained.
- (b) Accreditation must be achieved according to current and relevant Secured by Design guidelines at the time of above ground works of each Phase of the development.
- 30) No development shall commence in each relevant phase until a Stage 1 Written Scheme of Investigation (WSI) has been submitted to and approved by the Local Planning Authority in writing for each relevant phase. For land that is included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI, and the programme and methodology of site evaluation and the nomination of a competent person(s) or organisation to undertake the agreed works.
- 31) If heritage assets of archaeological interest are identified by a Stage 1 Written Scheme of Investigation (WSI) of Archaeology, then for those parts of the site which have archaeological interest, a Stage 2 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:

- i) 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.
 - ii) 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.
- 32) (a) In the event that the Stage I and/or Stage II Written Scheme of Investigation of Archaeology identifies any archaeological remains that require protection, no development shall take place in each relevant Phase (as identified in an approved Phasing Plan) until details of the foundation design and construction method to protect any archaeological remains in that phase have been submitted to and approved in writing by the Local Planning Authority.

(b) The development shall be carried out in accordance with the approved details.
- 33) (a) No development for each relevant phase shall commence until impact studies of the existing water supply infrastructure for that phase have been submitted to and approved in writing by the Local Planning Authority, in consultation with Thames Water. The studies shall determine the magnitude of any new additional capacity required in the system and a suitable connection point. Should additional capacity be required, the impact study should include ways in which this capacity will be accommodated.

(b) The development within each phase, as approved under Condition 3 above, shall then be implemented in accordance with the recommendations of the approved impact study and retained in perpetuity thereafter.
- 34) No development shall commence in each relevant phase other than investigative work until:
 - i) Taking account of information in the Land Contamination Assessment (Phase I) with reference HRW-BHE-GD-XX-RP-CG-002 Revision P03 prepared by Buro Happold Ltd dated 27th May 2021, a site investigation for that phase has been conducted for the site using information obtained from the desktop study and Conceptual Model. The investigation must be comprehensive enough to enable: a risk assessment to be undertaken, refinement of the Conceptual Model, and the development of a Method Statement detailing the remediation requirements.

- ii) The risk assessment and refined Conceptual Model shall be submitted, along with the site investigation report for that phase, to the Local Planning Authority.
 - iii) If the risk assessment and refined Conceptual Model indicate any risk of harm, a Method Statement detailing the remediation requirements, using the information obtained from the site investigation, and also detailing any post remedial monitoring shall be submitted to, and approved in writing by, the Local Planning Authority prior to that remediation being carried out on site.
- 35) Where remediation of contamination within each relevant Phase (as identified in an approved Phasing Plan) on the site is required pursuant to the condition above, completion of the remediation detailed in the method statement for each phase shall be carried out and a report that provides verification that the required works have been carried out, shall be submitted to, and approved in writing by the Local Planning Authority before the development is first occupied.
- 36) (a) If, during development, contamination not previously identified is found to be present at the site then no further development 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.
- (b) The remediation strategy shall be implemented as approved.
- 37) (a) The basement car parking areas hereby approved shall not be brought in to use until such times as Basement Access Control Arrangements have been submitted to and approved in writing by the Local Planning Authority.
- (b) The Basement Vehicular Access Control Arrangements shall include written and illustrated details of signal control and give-way systems to manage vehicular movements in and out of the approved basement car parks and demonstrate their adequacy to manage any vehicle queues.
- (c) The car parking areas shall be operated only in accordance with the relevant approved Basement Vehicular Access Control Arrangements.
- 38) (a) No development on the Goods Yard part of the site shall commence until a combined Stage 1 and Stage 2 Road Safety Audit for the proposed vehicular access junction and associated pedestrian footways on White Hart Lane has been submitted to and approved in writing by the Local Planning Authority.
- (b) The detailed design of the junction hereby approved shall be in accordance with the recommendations in an approved Audit and maintained thereafter and implemented before the first occupation of the development.

- 39) (a) No development on the Goods Yard part of the site shall commence until a combined Stage 1 and Stage 2 Road Safety Audit for the proposed vehicular route and associated pedestrian footways referred to as 'Embankment Lane' between Central Court (south of Goods Yard Block C) and Northern Square (northern edge of Goods Yard Zone 1) as shown on Drawing GYARD-F3-Z1-00-GA-A-82102-P3) has been submitted to and approved in writing by the Local Planning Authority.
- (b) The detailed design of the junction hereby approved shall be in accordance with the recommendations in an approved Audit and maintained thereafter and implemented before the first occupation of the development.
- 40) (a) No development in the relevant Phase shall be occupied until a Car Parking Design and Management Plan (CPMP) for that Phase has been submitted to and approved in writing by the Local Planning Authority.
- (b) The CPMP shall include details of the following:
- i. Location and design of any temporary car parking spaces.
 - ii. Location and design of car parking spaces.
 - iii. Provision of Electric Vehicle Charging Points (direct provision for 20% of spaces, with passive provision for the remaining 80%).
 - iv. Allocation, management and enforcement of residential car parking spaces (prioritising disabled people, then families with children then others).
 - v. Allocation, management and enforcement of commercial car parking spaces (provision only as needed by individual businesses).
 - vi. Provision, management and enforcement of disabled car parking spaces to allow for the required number of such spaces (up to 87 overall).
 - vii. Details of the proposed signal control and give-way systems used to manage vehicular movements in and out of the basement car parks via the proposed ramps.
- (c) Car parking shall be allocated, managed and enforced in accordance with the approved CPMP.
- (d) All car parking spaces shall be leased and not sold outright.
- 41) (a) No development shall commence in the relevant Phase until details of cycle parking and provision for changing/locker space for commercial units in that Phase have been submitted to and approved in writing by the Local Planning Authority.

(b) The cycle parking details shall demonstrate compliance with the relevant standards in Policy T5 of the London Plan (2021) and the London Cycling Design Standards.

(c) The cycle parking provision shall be implemented in accordance with the approved details before the occupation of each phase and retained thereafter for this use only.

- 42) (a) No development in the relevant Phase shall be occupied until a Delivery and Servicing Plan (DSP) for that Phase has been submitted to and approved in writing by the Local Planning Authority. The DSP for that Phase shall be in broad conformity with the approved Delivery and Servicing Plan (within the Transport Assessment prepared by Arup, 278880-ARP-XX-XX-RP-T-000001, 28 May 2021 and loading bay arrangements in the Arup response note dated 18 August 2021) and Transport for London's Delivery and Servicing Plan Guidance (2020), other than details of the location and dimensions of the all proposed loading bays which shall be submitted to and approved in writing by the Local Planning Authority.

(b) The DSP, including loading bays approved under (a) above shall be implemented and updated following the results of the first delivery and servicing survey to be undertaken within 12 months of first occupation of the relevant Phase of the proposed development.

(c) The process identified in (b) above shall be repeated until all Phases of the proposed development have been delivered and occupied, at which point every Phase DSP shall be consolidated into one overarching full DSP and retained thereafter.

(d) Further surveys and updates of the full DSP shall be submitted to and approved in writing by the Local Planning Authority.

- 43) (a) No development shall commence in a Phase (as identified in an approved Phasing Plan) until a Detailed Construction Logistics Plan (CLP) for that Phase has been submitted to and approved in writing by the Local Planning Authority.

(b) The Detailed CLP for each Phase shall conform with the approved Outline Construction Logistics Plan within the submitted Transport Assessment (278880- ARP-XX-XX-RP-T-000001, dated 28 May 2021) and Transport for London's Construction Logistics Planning Guidance (2021) and shall include the following details:

- i. Site access and car parking arrangements;
- ii. Delivery booking systems;
- iii. Construction phasing and agreed routes to/from the development replace lorry routeing;

- iv. Timing of deliveries to and removals from the site (to avoid peak times of 07.00 to 9.00 and 16.00 to 18.00 where possible);
- v. Travel plans for staff/ personnel involved in construction;
- vi. Crane Lifting Management Plan (CLMP); and
- vii. Crane Erection and Dismantling.

(c) Development shall be undertaken in accordance with the approved details.

- 44) (a) No development shall commence until an existing condition survey of the western half of the High Road carriageway and footway (between the railway bridge and the western pedestrian access to The Grange) and the northern half of White Hart Lane carriageway and footway (between the southern and northern site boundaries) has been undertaken in collaboration with the Council's Highways Maintenance team and submitted to and approved in writing by the Local Planning Authority.

(b) Within one month of the completion of all development works, including any highway works, a final condition survey shall be undertaken of the highway areas identified in (a) in collaboration with the Council's Highways Maintenance team and submitted to and approved in writing by the Local Planning Authority.

(c) The applicant shall ensure that any damages caused by the construction works and highlighted by the before-and-after surveys are addressed and the condition of the public highway is reinstated to the satisfaction of the Council's Highways Maintenance team in accordance with an associated Highway Agreement.

- 45) (a) No development in a relevant Phase (as identified in an approved Phasing Plan) that adjoins the western boundary of the site shall commence until an Infrastructure Protection Plan (IPP) for that Phase relating to London Overground has been submitted to and approved in writing by the Local Planning Authority.

(b) Any protection measures approved in an IPP shall be implemented in accordance with approved details.

- 46) (a) No demolition in each relevant Phase (as identified in an approved Phasing Plan) shall commence until a Demolition Environmental Management Plan (DEMP) for that Phase has been submitted to and approved in writing by the Local Planning Authority.

(b) No development in each relevant phase shall commence (other than demolition) until a Construction Environmental Management Plan (CEMP) has been submitted to and approved in writing by the Local Planning Authority.

(c) The DEMP and CEMP shall provide details of how demolition and construction works respectively are to be undertaken 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 shall be limited to 08.00 to 18.00 Monday to Friday and 08.00 to 13.00 on Saturdays. There shall be no working on Sundays or bank holidays;
- 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;
- x. Details of any other standard environmental management and control measures to be implemented.
- xi. Evidence of site registration at nrmmlondon.com to allow continuing details of Non-Road Mobile Machinery (NRMM) and plant of net power between 37kW and 560kW to be uploaded.

(d) the CEMP shall also include consideration as to whether any ecological protection measures are required for each relevant Phase (as identified in an approved Phasing Plan), to include an assessment of vegetation for removal, including mature trees, for the presence of nesting birds. Mitigation measures including the use of sensitive timings of works, avoiding the breeding bird season (March-August, inclusive) and, where not possible, pre-works checks by a suitably experienced ecologist will be provided in detail.

(e) All plant and machinery to be used during the demolition and construction phases of the development shall meet Stage IIIA of the EU Directive 97/68/EC for both NO_x and PM emissions.

(f) Demolition and construction works shall only be carried out in a particular Phase in accordance with an approved DEMP and CEMP for that Phase.

- 47) (a) No development in each relevant Phase (as identified in an approved Phasing Plan) shall commence, save for investigative work, until a detailed Air Quality and Dust Management Plan (AQDMP),

detailing the management of demolition and construction dust, has been submitted to and approved in writing by the Local Planning Authority. The AQDMP shall be in accordance with the Greater London Authority SPG Dust and Emissions Control (2014) and shall include:

- i) Monitoring locations;
- ii) Mitigation measures to manage and minimise demolition/construction dust emissions during works; and
- iii) a Dust Risk Assessment.

(b) Demolition and construction works shall only be carried out in a particular Phase in accordance with an approved AQDMP for that Phase.

- 48) (a) No piling shall take place in each relevant Phase (as identified in an approved Phasing Plan) until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) for that Phase has been submitted to and approved in writing by the Local Planning Authority in consultation with Thames Water.

(b) Any piling in each relevant Phase must be undertaken in accordance with the terms of the approved piling method statement for that Phase.

- 49) For the duration of the demolition and construction works the developer and its contractors shall establish and maintain a Liaison Group having the purpose of:

- i. informing local residents and businesses of the design and development proposals;
- ii. informing local residents and businesses of progress of preconstruction and construction activities;
- iii. considering methods of working such as hours and site traffic;
- iv. providing local residents and businesses with an initial contact for information relating to the development and for comments or complaints regarding the development with the view of resolving any concerns that might arise;
- v. providing advanced notice of exceptional works or deliveries; and
- vi. providing telephone contacts for resident's advice and concerns.

The terms of reference for the Liaison Group, including frequency of meetings, shall be submitted to and approved in writing by the Local Planning Authority prior to commencement of the development. For the avoidance of doubt, this could comprise the Applicant's existing 'Business and Community Liaison Group' (BCLG) or an alternative agreed with the Council.

- 50) The placement of any telecommunications apparatus, satellite dish or television antenna on any external surface of the development is precluded, with exception provided for a communal satellite dish or television antenna for the residential units details of which are to be submitted to the Local Planning Authority for its written approval prior to the first occupation of the development hereby approved. The provision shall be retained as installed thereafter.
- 51) (a) No development of any or all of Depot Block A, Goods Yard Block A & Goods Yard Block B shall commence above ground floor slab level until (notwithstanding what is indicated on the approved drawings), details of the colour of the external façade including the tops of the towers have been submitted to and approved by the Local Planning Authority
- (b) Thereafter the development shall be carried out in accordance with the approved details and materials.
- 52) (a) No development of any Block in the land known as "The Depot" shall commence above ground floor slab level until the boundary treatments of the Brook House Yard (shown on page 135 of the Design and Access Statement, May 2021) have been submitted to and approved by the Local Planning Authority.
- (b) Thereafter the development shall be carried out in accordance with the approved details and materials.

APPEARANCES

FOR THE LOCAL PLANNING AUTHORITY:

Andrew Fraser-Urquhart KC

Instructed by London Borough of Haringey

He called:

Marcus Wilshire

Director, the Collaborative City (Architecture)

Paul Reynolds

Director, Tapestry (Urban Design and Townscape)

Nairita Chakraborty

Founder of Revive and Tailor (Heritage)

Elizabeth Fitzgerald

Director, Barker Parry (Planning)

Philip Crowther
(Housing land supply roundtable only)

London Borough of Haringey

Matthew Barrett
(S106 Roundtable only)

Solicitor, London Borough of Haringey

FOR THE APPELLANT:

Christopher Katkowski KC and
Freddie Humpreys of Counsel

Instructed by Richard Max & Co LLP

They called:

Ian Laurence

Partner, F3 Architects LLP (Architecture)

Richard Coleman

Founder of City Designer (Urban Design and Townscape)

Ignus Froneman

Director, Cogent Heritage (Heritage)

Sean Bashforth

Senior Director, Quod (Planning)

James Beynon
(Roundtable sessions only)

Associate Director, Quod

David Warman
(S106 roundtable only)

Richard Max & Co LLP

DOCUMENTS SUBMITTED AT THE INQUIRY

1. The appellant's opening submissions.
2. The Council's opening submissions.
3. Assumed delivery rates from the extant permissions.
4. CIL compliance statement.
5. Revised list of planning conditions.
6. Site visit itinerary map.
7. Open space overlay and key from Mr Reynolds.
8. Site 4 housing land supply questionnaire.
9. Site 6 housing land supply questionnaire.
10. Mr Laurance – Evidence in Chief folder.
11. Secretary of State Appeal Decision – 3277137.
12. Mr Bashforth – open space document.
13. Extant consents maximum parameters of proposed blocks.
14. Revised list of planning conditions.
15. The Council's closing submissions.
16. The appellant's closing submissions.

DOCUMENTS SUBMITTED AFTER THE INQUIRY

1. Copy of signed and dated Section 106 Agreement.
2. Environmental Statement – Addendum, September 2022.
3. Updated ES Non-Technical Summary, September 2022.
4. Council's comments on the Environmental Statement Addendum and Non-Technical Summary.

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Assessor's Report

by R Sabu BA(Hons), MA, BArch, PgDip, RIBA, ARB

an Inspector appointed by the Secretary of State

Appeal Ref: APP/Y5420/W/21/3289690

Architecture and Design Assessment

The site

1. The site consists of two adjoining parcels of land, The Goods Yard Site and The Depot Site, which lie north of White Hart Lane and west of High Road. It is located a short distance north of White Hart Lane Station and northwest of Tottenham Hotspur Stadium.
2. The Goods Yard site has largely been cleared. The remaining buildings include the locally listed No 52 White Hart Lane, known as the Stationmaster's House, and modest two-storey industrial units at the south of the site. The site is bound to the west by a railway line, and to the east by the Peacock Industrial Estate.
3. The Depot site comprises a large retail building at the western part of the site and a number of small retail units at the southern part. In addition, the Grade II listed Nos 867 - 869 High Road lie on the southeast corner of the site.

Extant permissions

4. The two parts of the site benefit from separate hybrid planning permissions. The planning permission for the Goods Yard site was decided at appeal in 2019 and the planning permission for The Depot was decided by the Council in 2020. Both planning permissions are hybrid with only the works to the listed buildings being in detail. Other parts of the proposals are defined by parameter plans.
5. These extant permissions together include three towers at 29 storeys on The Depot site, 21 storeys at the northern part of the Goods Yard site and 18 storeys to the south. The Council are of the view that the likelihood of those consented schemes ever being constructed is purely theoretical. It was also noted that, in the view of the Council, the permissions could not be implemented before they expire in June and September 2023. However, the appellant confirmed that should this appeal fail and in the absence of other planning permissions for the site, they would implement the extant consents. I see no reason to disagree and therefore, there is a greater than theoretical possibility that the schemes would be implemented. As such, in my view, the extant permissions constitute a fall-back position to be afforded significant weight.

Lendlease scheme

6. A resolution to grant planning permission for a scheme covering an area wider than the site, including six towers, three north and three south of White Hart Lane, was made by the Council shortly before the Inquiry closed. A resolution to grant planning permission, subject to a Section 106 Agreement does not constitute a planning permission.
7. The appellant submitted comparison images of the Lendlease scheme with the appeal proposal. However, the comparison images are based on maximum parameters and there is no certainty regarding time frames for the grant of planning permission, implementation of the scheme or that the scheme would be implemented with massing as shown. As such, while the Lendlease scheme is a material consideration, I attribute limited weight to the comparison images provided by the appellant.

The surroundings

8. The Haringey Urban Character Study February 2015 identifies the area as being within the North Tottenham/Northumberland Park neighbourhood. The Townscape and Visual Impact Assessment (TVIA) and its Addendum includes an assessment of the area surrounding the site in terms of three character areas. This is in line with the character areas established for the consented schemes.
9. The character areas are North Tottenham/Angel Edmonton, High Road/Fore Street and Bruce Castle/Tottenham Cemetery. While the character of smaller parts within these areas do differ, such as around the stadium, the differences are generally subtle and localised, such that I consider the use of the three character areas to be appropriate for the purposes of this appeal.
10. The North Tottenham/Angel Edmonton character area generally consists of low-rise buildings that gives the area a spacious feel while the areas with commercial and industrial uses provide a vibrant character. The stadium is a large mass and the presence of which is felt in a number of views in the area, including from High Road and Northumberland Park.
11. The roads in this character area from which the proposal would be most viewed include Northumberland Park and Brantwood Road which are largely characterised by two storey dwellings. The industrial and commercial uses have larger footprints but have a low height which result in the area having a varied and spacious character. Likewise, the area to the west of the site and railway line is characterised by low rise residential buildings such as on Pretoria Road with commercial uses particularly along White Hart Lane. There are also buildings with larger massing such as Haringey Sixth Form

College that also have a low height which results in a similar spacious character.

12. The townscape of the North Tottenham/Angel Edmonton character area is, however, punctuated by tall buildings. Most relevant to the site is Brook House to the north of the site which is 22-23 storeys high and is part of the Rivers Apartments complex consisting otherwise of six to nine storey tall residential units and a school. To the northeast of the site lies Stellar House on High Road which is around 20 storeys high and the Love Lane estate south of White Hart Lane, which comprises residential buildings that are up to ten storeys in height.
13. The High Road/Fore Street character area primarily consists of High Road and a short section of White Hart Lane to which the site and proposal would form a backdrop.
14. High Road is a busy urban thoroughfare with relatively complete historic frontages. The buildings are generally two and three storeys high with groups of historic buildings largely of brick with stone detailing. Together with the mix of uses along High Road, this gives the area a varied but largely traditional and modest character with a range of uses that result in a vibrant community feel.
15. The Bruce Castle/Tottenham Cemetery character area is some distance from the site and is dominated by Tottenham Cemetery and Bruce Castle Park. The buildings are between two and four storeys in height with clusters of historic buildings. Despite a number of modern blocks of flats, the area has an open green feel with a modest domestic character.
16. Overall, given the largely two and three storey heights of the buildings along High Road and White Hart Lane along with the interspersed tall buildings, the area surrounding the site has a pleasant spacious and modest character and appearance that has a vibrant feel given the mix of commercial uses and nearby residential properties.

Policy background

17. The development plan for the area consists of the London Plan, 2021 (the London Plan), the Development Management Development Plan Document (DPD), 2017 (the DM DPD), the Strategic Policies with Alterations, 2017 (the Strategic Policies) and the North Tottenham Area Action Plan, 2017 (the AAP).
18. Policy SP11 of the Strategic Policies sets out the criteria for the assessment of tall buildings while DM DPD Policy DM6 identifies North Tottenham as a potential location appropriate for tall buildings. In addition, AAP Policy AAP6 identifies North Tottenham as a Growth

Area. Furthermore, Policy NT5 of the AAP sets out details of the site allocation NT5: High Road West which includes the site and covers the Rivers Apartments development to the north and the Love Lane estate to the south of the site. The site allocation also states that development should accord with the principles set out in the most up-to-date Council approved masterplan.

19. Currently, that masterplan is the Tottenham High Road West Masterplan Framework, 2014 (the HRWMF). As set out within, the main role of this masterplan is to establish key principles to guide future development proposals.
20. Key principles include building massing falling towards White Hart Lane to create an appropriate heritage setting for statutorily listed and locally listed assets. The HRWMF goes further to state that taller building elements should be located adjacent to the rail corridor away from the High Road and towers should descend in equal steps down from 18 storeys at the north to 10 storeys towards White Hart Lane.
21. With respect to building heights, DM DPD Policy DM6 states that tall buildings should represent a landmark building. However, the Policy goes on to provide criteria for tall buildings within close proximity to each other. Moreover, the London Plan states that not all tall buildings need to be iconic landmarks.

Proposal

22. The scheme comprises a residential led mixed-use development with commercial, business and service uses and a mix of market and affordable homes.
23. The proposal includes three tall buildings, one with 29 storeys at The Depot part of the site, one with 32 storeys at the north of the Goods Yard site and the southernmost tower having 27 storeys.

Long, mid-range and immediate views from the surrounding area

24. The proposed towers would be aligned on an approximately north south axis along the western side of the site as set out in the HRWMF. However, in terms of height, the towers would be significantly taller than the heights set out in the HRWMF. Moreover, they would not descend in equal steps from the north towards White Hart Lane. Accordingly, the proposal would not accord with AAP site allocation NT5 in this particular respect which requires development to accord with the principles set out in the most up-to-date Council-approved masterplan.
25. However, the towers of the extant permissions are also significantly taller than the heights suggested in the HRWMF and taller than Brook House. As such, the principle of descending building heights from north to south may not be implemented in any event.

26. The consented schemes propose a rise in height from Brook House to The Depot tower. The towers would then step down a similar distance to the Goods Yard North tower. However, there would be a smaller height difference between the two towers of the Goods Yard. In addition, the siting of the two towers of the Goods Yard would have a smaller distance between them compared with the distance between the tower at The Depot and the tower at Goods Yard North. This inconsistency in the difference in tower heights and spacing between them would result in a lack of harmony and legibility of the towers as a group in terms of height and massing.
27. The design principle driving the heights of the proposed towers in this case, is based on an arc taken from the top of Brook House, passing the top of The Depot tower, rising to an apex at the top of the proposed Goods Yard North tower then descending to the top of the Goods Yard South tower. The towers have also been relocated closer to Brook House and the distances between them made more consistent. Furthermore, the heights of the middle portion of the towers, or the 'jacket' as described in the evidence, also roughly follow the line of an arc taken from Brook House.
28. The approximate height of The Depot tower is proposed as 29 storeys in both the extant permissions and the appeal proposal. However, the tallest tower of the consented schemes would be at The Depot whereas in the proposed scheme the tallest tower would be at Goods Yard North.
29. The heights and siting of the proposed towers would result in a gentler and more symmetrical rise and fall of the tops of the towers and would therefore appear to be in greater harmony with each other and with Brook House compared with the extant permissions albeit particularly when viewed from the west and east.
30. In View 7 of the TVIA on Northumberland Park, the towers would have a significant effect on the skyline given that the existing long view is primarily of sky above the trees in the distance albeit there may be glimpses of Stellar House.
31. Brook House is seen in View 13 projecting above the roofs of the two storey terraced dwellings on Brantwood Road. The proposed towers would be viewed alongside Brook House and given their relative heights and spacing, the legibility of the towers as a group would be apparent in this view. The proposed towers would step up from The Depot tall building, which would be seen roughly centrally in this view, then down to the south. The towers of the extant permission, on the other hand, would step down to the south from The Depot tall building.
32. In View 27 from Durban Road to the west of the site, the impact on the skyline would also be significant. The articulation of the massing

of the jackets of the proposed towers would temper this impact by drawing the eye to a lower set of heights defining the tops of the middle portion of the towers. The harmony in height and massing between the towers would also be seen in this view.

33. The change in height between the proposed towers and the surrounding predominantly two storey scale to the east and west of the site would be significant and clearly apparent in long views. This sudden change in height would have an incongruous effect in these views and an adverse effect on the spacious modest character of these areas.
34. However, in a number of long views, the skyline is already punctuated by the height of Brook House and the extant permissions would be likely to result in a significant change in height between the towers and the surrounding area in any event, albeit to a smaller degree.
35. Although not all equivalent views exist for the consented schemes, it is clear that the towers of the extant permissions would be lower in height and would therefore have a less significant effect on the skyline. However, it is likely, given the height of the towers of the consented schemes, that the awkward relationship between the siting and heights of the towers would be apparent.
36. In terms of plan form, the towers would have a greater width in the north south direction than in the east west direction. The width would also be greater than that indicated for the towers of the extant schemes. This would result in the appearance of comparatively increased massing when viewed from the east and west.
37. However, in order to visually break down the massing of the building, a tripartite approach has been employed. The top of the buildings would be stepped back, and the lower part of the towers would rise from podium blocks that would create a top, middle and base breaking down the height of the buildings while roughly following the line of arc taken from Rivers Apartments and Brook House. In order to break down the width of the building, as well as the faceting of the east and west facades, the cladding around the middle of the tower would create a jacket feature that would partially wrap around the building breaking down the vertical massing of the towers into three parts.
38. Given the tripartite motif employed in the design of the massing of the buildings, the towers would not appear to be slab blocks and the articulation of the massing would be apparent in long views. Therefore, while the increased width of the towers compared with the parameters of the extant permissions would be likely to result in a greater loss of spaciousness, this effect would be partially mitigated by the design of the massing.

39. In mid-range views, such as View 4 from High Road outside the stadium, the towers would project a significant distance above the prevailing roofscape of the two and three storey buildings that line High Road. Whereas currently the low-rise townscape is punctuated by the single tower of Brook House which appears in the backdrop of many views in the area, the skyline in this view would be significantly altered by the three proposed towers.
40. The massing of the towers would have the greatest effect on the character of local areas when seen from immediate views such as View 6 and View 10 of the TVIA. The towers would be taller and wider than Brook House and the parameters of the tall buildings of the extant schemes. The significant change in scale would appear incongruous when viewed against the low-rise buildings of High Road. Since the proposed tall buildings would occupy a greater amount of space above the prevailing roofline of the buildings along High Road compared with the consented schemes, it would diminish the spacious modest character of the High Road area.
41. However, the tripartite motif and articulation of the massing would also be most visible in these immediate views. In addition, while the towers would greatly alter the backdrop of High Road, they would be set back from the street and would appear to be part of a different character area. The HRWMF envisages a new character area to be created and the landmark buildings as set out within would be likely to project above the prevailing roofscape in any event.
42. With respect to coalescence, the towers would appear to overlap each other in views from the north and south such as View 24 of the TVIA. However, given the slender proportions of the north and south elevations of the towers and the distance between the buildings, this effect would not result in an unduly bulky massing in these views.
43. The towers may also appear to overlap in distant views from the west such as View 18 from within Tottenham Cemetery. However, the articulation of the massing of the towers including the set back of the top of the tower would partially mitigate the effect of coalescence in these views.
44. The Depot tower would be closer to Brook House compared with the extant scheme. While this would reduce the space between the towers, the distance would still be sufficient to largely avoid the effects of coalescence in this respect. As discussed earlier, the reduction in space between Brook House and The Depot tower as well as the relationship between the heights of the proposed towers with Brook House would result in a more harmonious appearance than the extant schemes.
45. In summary, given their height and massing, the proposed towers would have an adverse effect on the spacious character of the North

Tottenham/Angel Edmonton area. It would also harm the modest character of the High Road/Fore Street character area. However, the harm would be limited compared with the extant schemes since the relationship between the siting and heights of the proposed tall buildings would appear more harmonious.

Maximising vs optimising residential density

46. London Plan Policy D3 states that all development must make the best use of land by following a design-led approach that optimises the capacity of sites, including site allocations. Policy SP1 of the Strategic Policies states that the Council will expect development in Growth Areas to maximise site opportunities.
47. The Council has indicated that the scale and slab block form of the tall buildings are evidence of maximising rather than optimising. It was also stated that without a townscape justification based on the legibility of cross routes as proposed in the HRWMF, the scale of the tall buildings can only be explained as a means of maximising density.
48. Since the tall buildings would have faceted facades and the jacket feature would break down the massing of the buildings, the towers would not appear as typical slab blocks or point blocks. The proposed towers would be sited roughly at the end of the proposed east-west routes from High Road to the site which would utilise existing pathways between buildings. Although the routes from High Road to each of the towers would not all be in a straight line, given their orientation and siting, and that they would be visible along the east west routes through the area, the towers would aid wayfinding through the site.
49. Currently Brook House provides a landmark for the northern edge of the masterplan area. Given their height and width, the proposed towers would stand out against the prevailing skyline to a much greater degree than Brook House and the heights suggested in the masterplan. The scheme would therefore diminish the role of Brook House as the primary landmark for the area.
50. The proposed towers would provide additional landmarks for the masterplan area. However, since the HRWMF indicates three landmarks including Brook House, the presence of more than one landmark in itself does not appear to be precluded in policy terms.
51. The HRWMF does not indicate the tower at The Depot site being a landmark building. Instead, the route east west through the site in this area appears to be reserved for a railway bridge link from High Road to the west. The Depot tower is sited closer to Brook House compared to that shown in the HRWMF and the extant permissions. This would restrict a direct route through the site from High Road to

such a potential bridge link to the west. However, as confirmed during the Inquiry, the bridge link does not form a critical part of the masterplan as it does not appear to be referred to in writing.

52. In the proposed scheme, the view from High Road through Pickford Lane would be terminated by the entrance to the tower, rather than being left open for a bridge link. Given that a primary access to the site from High Road would be at this location, the proposed siting of The Depot tower would assist wayfinding through the local townscape. Moreover, a route to a potential bridge link, albeit not a straight path, would be safeguarded by the creation of Northern Square. Accordingly, the loss of a direct route to a potential bridge link and the creation of a landmark tower at The Depot site is justified in my view.
53. The Council also state that the number of single-aspect units and the floor to ceiling heights are indicative of the proposal maximising rather than optimising residential density. However, the Council did not have any substantial concerns with respect to the living environment of future occupiers. Given the evidence I see no reason to disagree and therefore do not consider that the proposal would maximise rather than optimise residential density.

Architectural quality

54. The articulation of the facades was subject to extensive reviews during the application process and underwent a number of design changes as a result. I will necessarily assess the scheme upon which the Council based its determination.
55. The top of the towers would feature a darker grey infill to the masonry elements. While the darker colour could result in a heavier appearance, the use of a contrasting tone to the cladding jacket would help to visually break up the massing of the building. In addition, the use of this material as a vertical continuous feature from the top of the towers to the ground level would unify the top, middle and bottom portions of the buildings. The exact colour and tone of the infill material could be controlled by the use of a suitably worded condition.
56. The tops of the towers would also feature light grey or white ceramic framing with open corners that would lighten the massing of the tops of the towers. Although the framing would be set out in square proportions, the narrow width of the frame elements would result in a lightweight appearance at the top of the towers.
57. The stack bonding of the grey infill bricks at the tops of the buildings would not appear noticeable from ground level other than where the feature meets the base of the towers. Together with the lightness of the framing and its open corners, the tops of the towers would not

appear top heavy in immediate views such as View 6. In long views such as View 27, the framing at the top of the towers would allow some of the sky to be seen through the open corners. This would result in a lightness that would be apparent from long distances.

58. The height of the top of the towers would constitute roughly a fifth of the overall height of the towers. Given the location of the site, the base and part of the middle of the towers would be obscured by intervening buildings in many surrounding views. Given the set back of the tops of the towers, they would have a smaller massing than the middle part of the towers. Therefore, the height of the tops of the towers would aid the breakdown of the massing of the tall buildings.
59. The elevational treatment of the tops of the towers would continue in the 'core' element that would run vertically through the buildings to ground level. A ceramic terracotta jacket at the middle of the towers would wrap around a large part of the buildings while revealing the core element. Reeded profile terracotta infill panels would be set within a smooth terracotta frame and the glazing and fenestration components would be in a bronze colour that would also feature in the core element. Projecting floor slabs and deep reveals to window openings would add layers of depth to the elevation.
60. Accordingly, while the window fenestration and balconies would be vertically aligned and the areas of glazing may have been reduced during the application process, the architectural expression of the middle of the towers including the terracotta frame would not appear unduly heavy.
61. Given the above, the overall range of textures, colour, tone and depth would result in a highly articulated and well-designed façade with materials and design features that would be echoed throughout the three tall buildings.
62. The interface of the Depot tower with the 'shoulder' block would be expressed through the darker materials of the core element being brought to ground level visually separating the two elements. As such there would be clear distinction between the two parts of the building.
63. In addition, the proposed tall buildings and their elevational treatment would be viewed against Brook House which has comparatively less elevational articulation resulting in a bland appearance. Therefore, notwithstanding my findings with respect to the height and scale of the tall buildings, the facades of the proposal would appear to be of a higher quality in terms of architectural design and materials compared with Brook House. This aspect of the scheme would consequently have a positive effect on the character of the area.

64. Given the above, the architectural quality and materials would be of an exemplary standard as required by London Plan Policy D9.

Townscape

65. The HRWMF indicates essentially four urban blocks whereas the proposal includes the Goods Yards towers rising from a single podium. Although the layout would depart from the masterplan layout, the creation of the podium and a route running north south through the site aids legibility through the site while permitting opportunity for the development of adjacent plots up to their boundary. Consequently, this aspect of the scheme would not harm the character and appearance of the area.

Conclusions

66. The proposal would undoubtedly have a significant effect on long, mid-range and immediate views. The height, breadth and massing of the tall buildings would result in an abrupt change in scale compared with the prevailing local townscape. This would have an incongruous effect in a number of views and would diminish the spacious and modest character of the surrounding area. However, this effect would be tempered by the articulation of the massing and the harmonious relationship between the proposed towers.
67. The extant permissions in comparison would result in a less significant change in scale. However, given the heights and spacing, the consented towers would have a less harmonious relationship than the proposed tall buildings. As such the harm to the character and appearance of the area that would result from the proposal would be limited compared with the consented schemes.
68. The height of the proposed tall buildings would aid wayfinding by marking the east west routes through the site. In addition, the scheme would not result in adverse effects in terms of the living environment of future occupiers with respect to internal space. As such, the scheme would represent an optimum capacity of the site.
69. The proposed buildings would have highly articulated facades with a range of materials, textures, colours, tones and layers of depth that would be set out in well-proportioned bays that would result in an exemplary standard of architectural quality. This aspect of the scheme would have a beneficial effect on the character of the area.
70. However, given the adverse effect on the character of the area from the scale, height and massing of the tall buildings, overall, the proposed development would harm the character and appearance of the surrounding area.
71. Therefore, the scheme would conflict with London Plan Policy D3 which seeks, among other things, that development proposals should

enhance local context by delivering buildings and spaces that positively respond to local distinctiveness through their scale. It would also conflict with London Plan Policy D9 which seeks tall buildings that positively contribute to the character of the area. The proposal would conflict with Policy SP11 of the Strategic Policies, AAP Policy AAP6 and DM DPD Policy DM6 which together seek development that respects and responds positively to its local context and surrounding character.

72. In addition, the scheme would conflict with AAP Site Allocation NT5 which requires that developments should accord with the principles set out in the most up-to-date Council-approved masterplan.
73. It would therefore also conflict with Policy SP1 of the Strategic Policies which requires development in Growth Areas to accord with the full range of the Council's planning policies and objectives. The proposal would also fail to accord with paragraph 130 of the Framework in this particular respect.
74. The proposal would not conflict with London Plan Policy GG2 which requires among other things, that developments apply a design-led approach to determine the optimum development capacity of sites.
75. The harm to the character of the area that would result from the proposal's conflict with the above policies would be limited by the exemplary architectural quality of the proposed facades. Moreover, the harm would be limited in comparison with the consented schemes on the site.

R. Sabu

INSPECTOR